

Draft recommendations on the
future electoral arrangements for
Wolverhampton

October 2002

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WHAT IS THE BOUNDARY COMMITTEE FOR ENGLAND?

The Boundary Committee for England is a committee of The Electoral Commission, an independent body set up by Parliament under the Political Parties, Elections and Referendums Act 2000. The functions of the Local Government Commission for England were transferred to The Electoral Commission and its Boundary Committee on 1 April 2002 by the Local Government Commission for England (Transfer of Functions) Order 2001 (SI 2001 No. 3692). The Order also transferred to The Electoral Commission the functions of the Secretary of State in relation to taking decisions on recommendations for changes to local authority electoral arrangements and implementing them.

Members of the Committee are:

Pamela Gordon (Chair)
Professor Michael Clarke CBE
Robin Gray
Joan Jones
Ann M. Kelly
Professor Colin Mellors

Archie Gall (Director)

We are required by law to review the electoral arrangements of every principal local authority in England. Our aim is to ensure that the number of electors represented by each councillor in an area is as nearly as possible the same, taking into account local circumstances. We can recommend changes to ward boundaries, the number of councillors and ward names.

SUMMARY

The Local Government Commission for England (LGCE) began a review of the electoral arrangements for Wolverhampton on 4 December 2001. As a consequence of the transfer of functions referred to earlier, it falls to us to complete the work of the LGCE.

- **This report summarises the submissions we received during the first stage of the review, and makes draft recommendations for change.**

We found that the current arrangements provide unequal representation of electors in Wolverhampton:

- **in five of the 20 wards the number of electors represented by each councillor varies by more than 10% from the average for the city;**
- **by 2006 this situation is expected to worsen, with the number of electors per councillor forecast to vary by more than 10% from the average in five wards and by more than 20% in one ward.**

Our main draft recommendations for future electoral arrangements (see Tables 1 and 2 and paragraphs 92–93) are that:

- **Wolverhampton City Council should have 60 councillors, as at present;**
- **there should be 20 wards, as at present;**
- **the boundaries of 16 of the existing wards should be modified, and four wards should retain their existing boundaries.**

The purpose of these proposals is to ensure that, in future, each city councillor represents approximately the same number of electors, bearing in mind local circumstances.

- **In 18 of the proposed 20 wards the number of electors per councillor would vary by no more than 10% from the city average.**
- **This improved level of electoral equality is forecast to improve further, with the number of electors per councillor in all wards expected to vary by no more than 8% from the average for the city in 2006.**

This report sets out our draft recommendations on which comments are invited.

- **We will consult on these proposals for eight weeks from 22 October 2002. We take this consultation very seriously. We may decide to move away from our draft recommendations in the light of comments or suggestions that we receive. It is therefore important that all interested parties let us have their views and evidence, *whether or not* they agree with our draft recommendations.**
- **After considering local views, we will decide whether to modify our draft recommendations. We will then submit our final recommendations to The Electoral Commission which will be responsible for implementing change to local authority electoral arrangements.**
- **The Electoral Commission will decide whether to accept, modify or reject our final recommendations. It will also determine when any changes come into effect.**

You should express your views by writing directly to us at the address below by 16 December 2002:

**Team Leader
Wolverhampton Review
The Boundary Committee for England
Trevelyan House
Great Peter Street
London SW1P 2HW**

Table 1: Draft recommendations: Summary

Ward name	Number of councillors	Constituent areas	Large map reference
1 Bilston East	3	Bilston East ward; part of Bilston North ward; part of Ettingshall ward	2
2 Bilston North	3	Part of Bilston North ward; part of East Park ward	2
3 Blakenhall	3	<i>Unchanged</i>	2
4 Bushbury	3	Part of Bushbury ward; part of Oxley ward	1
5 East Park	3	Part of Bilston North ward; part of East Park ward; part of St Peter's ward	1 & 2
6 Ettingshall	3	Part of Ettingshall ward; part of St Peter's ward; part of Spring Vale ward	2
7 Fallings Park	3	Fallings Park ward; part of Bushbury ward; part of Low Hill ward	1
8 Graiseley	3	<i>Unchanged</i>	2
9 Heath Town	3	Part of Heath Town ward; part of St Peter's ward; part of Wednesfield South ward	1 & 2
10 Low Hill	3	Part of Bushbury ward; part of Low Hill ward; part of St Peter's ward	1
11 Merry Hill	3	<i>Unchanged</i>	2
12 Oxley	3	Part of Oxley ward; part of Tettenhall Regis ward	1
13 Park	3	Part of Park ward; part of St Peter's ward	1 & 2
14 Penn	3	<i>Unchanged</i>	2
15 St Peter's	3	Part of Oxley ward; part of St Peter's ward	1 & 2
16 Spring Vale	3	Part of Ettingshall ward; part of Spring Vale ward	2
17 Tettenhall Regis	3	Part of Tettenhall Regis ward; part of Tettenhall Wightwick ward	1
18 Tettenhall Wightwick	3	Part of Park ward; part of Tettenhall Wightwick ward	1 & 2
19 Wednesfield North	3	Wednesfield North ward; part of Wednesfield South ward	1
20 Wednesfield South	3	Part of Heath Town ward; part of Wednesfield South ward	1 & 2

Notes: 1 The city contains no parishes.

2 The wards in the above table are illustrated on Map 2 and the large maps.

3 We have made a number of minor boundary amendments to ensure that existing ward boundaries adhere to ground detail. These changes do not affect any electors.

Table 2: Draft recommendations for Wolverhampton

Ward name	Number of councillors	Electorate (2001)	Number of electors per councillor	Variance from average %	Electorate (2006)	Number of electors per councillor	Variance from average %
1 Bilston East	3	9,293	3,098	1	9,518	3,173	4
2 Bilston North	3	9,388	3,129	2	9,407	3,136	3
3 Blakenhall	3	8,966	2,989	-2	8,867	2,956	-3
4 Bushbury	3	9,310	3,103	2	9,011	3,004	-1
5 East Park	3	9,125	3,042	0	9,330	3,110	2
6 Ettingshall	3	9,681	3,227	6	9,896	3,299	8
7 Fallings Park	3	9,555	3,185	4	9,301	3,100	2
8 Graiseley	3	9,134	3,045	0	9,289	3,096	2
9 Heath Town	3	7,843	2,614	-14	8,784	2,928	-4
10 Low Hill	3	9,160	3,053	0	9,088	3,029	-1
11 Merry Hill	3	9,631	3,210	5	9,319	3,106	2
12 Oxley	3	9,378	3,126	2	9,110	3,037	0
13 Park	3	9,340	3,113	2	9,179	3,060	0
14 Penn	3	10,034	3,345	9	9,785	3,262	7
15 St Peter's	3	8,128	2,709	-11	8,429	2,810	-8
16 Spring Vale	3	8,923	2,974	-3	9,120	3,040	0
17 Tettenhall Regis	3	9,010	3,003	-2	8,762	2,921	-4
18 Tettenhall Wightwick	3	9,210	3,070	0	9,040	3,013	-1
19 Wednesfield North	3	9,388	3,129	2	9,034	3,011	-1
20 Wednesfield South	3	8,809	2,936	-4	8,631	2,877	-6
Totals	60	183,306	-	-	182,900	-	-
Averages	-	-	3,055	-	-	3,048	-

Source: Electorate figures are based on Wolverhampton City Council's submission.

Note: The 'variance from average' column shows by how far, in percentage terms, the number of electors per councillor varies from the average for the city. The minus symbol (-) denotes a lower than average number of electors. Figures have been rounded to the nearest whole number.

1 INTRODUCTION

1 This report contains our proposals for the electoral arrangements for the City of Wolverhampton, on which we are now consulting. We are reviewing the seven metropolitan districts in the West Midlands as part of our programme of periodic electoral reviews (PERs) of all 386 principal local authority areas in England. The programme started in 1996 and is currently expected to finish in 2004.

2 This is our first review of the electoral arrangements of Wolverhampton. Wolverhampton's last review was carried out by the Local Government Boundary Commission, which reported to the Secretary of State in June 1979 (Report no. 340).

3 In carrying out these metropolitan reviews we must have regard to:

- the statutory criteria contained in section 13(5) of the Local Government Act 1992 (as amended by SI 2001 No. 3692), i.e. the need to:
 - (a) reflect the identities and interests of local communities;
 - (b) secure effective and convenient local government; and
 - (c) achieve equality of representation.
- Schedule 11 to the Local Government Act 1972.

4 Details of the legislation under which the review of Wolverhampton is being conducted are set out in a document entitled *Guidance and Procedural Advice for Local Authorities and Other Interested Parties* (LGCE, fifth edition published in October 2001). This *Guidance* sets out the approach to the review.

5 Our task is to make recommendations to The Electoral Commission on the number of councillors who should serve on a council, and the number, boundaries and names of wards.

6 The broad objective of PERs is to achieve, as far as possible, equal representation across the city as a whole. Schemes which would result in, or retain, an electoral imbalance of over 10% in any ward will have to be fully justified. Any imbalances of 20% or more should only arise in the most exceptional circumstances, and will require the strongest justification.

7 We are not prescriptive on council size. However, we believe that any proposals relating to council size, whether these are for an increase, a reduction or no change, should be supported by evidence and argumentation. Given the stage now reached in the introduction of new political management structures under the provisions of the Local Government Act 2000, it is important that whatever council size interested parties may propose to us they can demonstrate that their proposals have been fully thought through, and have been developed in the context of a review of internal political management and the role of councillors in the new structure. However, we have found it necessary to safeguard against upward drift in the number of councillors, and we believe that any proposal for an increase in council size will need to be fully justified. In particular, we do not accept that an increase in electorate should automatically result in an increase in the number of councillors, or that changes should be made to the size of a council simply to make it more consistent with the size of other similar councils.

8 Under the provisions of the Local Government Act 1972 there is no limit on the number of councillors who can be returned from each metropolitan city ward. However, the figure must be divisible by three. In practice, all metropolitan city wards currently return three councillors. Where our recommendation is for multi-member wards, we believe that the number of councillors to be returned from each ward should not exceed three, other than in very exceptional circumstances. Numbers in excess of three could result in an unacceptable dilution

of accountability to the electorate and we have not, to date, prescribed any wards with more than three councillors.

9 The review is in four stages (see Table 3).

Table 3: Stages of the review

Stage	Description
One	Submission of proposals to us
Two	Our analysis and deliberation
Three	Publication of draft recommendations and consultation on them
Four	Final deliberation and report to The Electoral Commission

10 Stage One began on 4 December 2001, when the LGCE wrote to Wolverhampton City Council inviting proposals for future electoral arrangements. It also notified West Midlands Police Authority, the Local Government Association, West Midlands Local Councils Association, Members of Parliament with constituency interests in the city, Members of the European Parliament for the West Midlands Region, and the headquarters of the main political parties. It placed a notice in the local press, issued a press release and invited Wolverhampton City Council to publicise the review further. The closing date for receipt of representations, the end of Stage One, was 8 April 2002.

11 At Stage Two we considered all the submissions received during Stage One and prepared our draft recommendations.

12 We are currently at Stage Three. This stage, which began on 22 October 2002 and will end on 16 December 2002, involves publishing the draft proposals in this report and public consultation on them. **We take this consultation very seriously and it is therefore important that all those interested in the review should let us have their views and evidence, whether or not they agree with these draft proposals.**

13 During Stage Four we will reconsider the draft recommendations in the light of the Stage Three consultation, decide whether to modify them, and submit final recommendations to The Electoral Commission. It will then be for it to accept, modify or reject our final recommendations. If The Electoral Commission accepts the recommendations, with or without modification, it will make an Order. The Electoral Commission will determine when any changes come into effect.

2 CURRENT ELECTORAL ARRANGEMENTS

14 The City of Wolverhampton is situated in the north-west of the West Midlands, to the east of the county of Staffordshire, and is one of the principal manufacturing centres of the area. The city benefits from strong communication and transport links with the East and West Midlands, as well as the rest of the country.

15 Since 1975 there has been a decrease in electorate of some 4%, from 191,455 to the current electorate of 183,306. The electorate is forecast to decrease further, to 182,900, by 2006. The Council presently has 60 members who are elected from 20 wards, all of which are relatively urban. All wards are three-member wards. The city contains no civil parishes.

16 At present, each councillor represents an average of 3,055 electors, which the City Council forecasts will decrease to 3,048 by the year 2006 if the present number of councillors is maintained. However, due to demographic and other changes over the past two decades, the number of electors per councillor in five of the 20 wards varies by more than 10% from the city average. The worst imbalances are in Bilston North and East Park wards, where each councillor represents 16% more and 16% fewer electors than the city average, respectively.

17 To compare levels of electoral inequality between wards, we calculated the extent to which the number of electors per councillor in each ward (the councillor:elector ratio) varies from the city average in percentage terms. In the text which follows, this calculation may also be described using the shorthand term 'electoral variance'.

Map 1: Existing wards in Wolverhampton

Table 4: Existing electoral arrangements

Ward name	Number of councillors	Electorate (2001)	Number of electors per councillor	Variance from average %	Electorate (2006)	Number of electors per councillor	Variance from average %
1 Bilston East	3	8,432	2,811	-8	8,672	2,891	-5
2 Bilston North	3	10,664	3,555	16	10,646	3,549	16
3 Blakenhall	3	8,966	2,989	-2	8,867	2,956	-3
4 Bushbury	3	8,787	2,929	-4	8,681	2,894	-5
5 East Park	3	7,672	2,557	-16	7,919	2,640	-13
6 Ettingshall	3	8,580	2,860	-6	8,866	2,955	-3
7 Fallings Park	3	8,231	2,744	-10	8,018	2,673	-12
8 Graiseley	3	9,134	3,045	0	9,289	3,096	2
9 Heath Town	3	8,104	2,701	-12	8,201	2,734	-10
10 Low Hill	3	8,643	2,881	-6	8,401	2,800	-8
11 Merry Hill	3	9,631	3,210	5	9,319	3,106	2
12 Oxley	3	9,602	3,201	5	9,335	3,112	2
13 Park	3	10,306	3,435	12	10,151	3,384	11
14 Penn	3	10,034	3,345	9	9,785	3,262	7
15 St Peter's	3	10,264	3,421	12	11,630	3,877	27
16 Spring Vale	3	10,102	3,367	10	9,770	3,257	7
17 Tettenhall Regis	3	9,276	3,092	1	8,994	2,998	-2
18 Tettenhall Wightwick	3	9,101	3,034	-1	8,927	2,976	-2
19 Wednesfield North	3	8,897	2,966	-3	8,559	2,853	-6
20 Wednesfield South	3	8,880	2,960	-3	8,870	2,957	-3
Totals	60	183,306	-	-	182,900	-	-
Averages	-	-	3,055	-	-	3,048	-

Source: Electorate figures are based on information provided by Wolverhampton City Council.

Note: The 'variance from average' column shows by how far, in percentage terms, the number of electors per councillor varies from the average for the city. The minus symbol (-) denotes a lower than average number of electors. For example, in 2001, electors in East Park ward were relatively over-represented by 16%, while electors in Bilston North ward were relatively under-represented by 16%. Figures have been rounded to the nearest whole number.

3 SUBMISSIONS RECEIVED

18 At the start of the review members of the public and other interested parties were invited to write to the LGCE giving their views on the future electoral arrangements for Wolverhampton City Council.

19 During this initial stage of the review, officers from the LGCE visited the area and met officers and members from the City Council. We are grateful to all concerned for their co-operation and assistance. Thirty-one representations were received during Stage One, including a city-wide scheme from the City Council, all of which may be inspected at our offices and those of the City Council.

Wolverhampton City Council

20 The City Council conducted a thorough consultation exercise before submitting its proposals. It proposed retaining a council of 60 members serving 20 wards. It stated that ‘all three political groups on the Council are firmly of the view that 60 councillors elected from 20 wards represents the most effective and convenient means of delivering the Council’s functions in the future’. The scheme received consensual support from all political groups for 10 of the 20 proposed wards (Bilston East, Bilston North, East Park, Ettingshall, Spring Vale, Blakenhall, Penn, Merry Hill, Graiseley and Bushbury). However, alternative options for the western, eastern and north-eastern areas of the city were submitted with the main proposal, at the request of the Conservative Group on the council. These affected the remaining 10 wards. Under all the Council’s proposals, no ward was forecast to vary by more than 6% from the average councillor:elector ratio for the city by 2006.

The Conservative Group on the Council

21 As detailed above, the Conservative Group on the Council proposed alternative warding arrangements for the west, east and north-east of the city, which the City Council submitted as its alternative options. The Conservative Group supported the remainder of the main proposals. It submitted a separate representation in which it detailed its evidence and justification for the alternative options, which affected the wards of Fallings Park, Heath Town, Low Hill, Oxley, Park, St Peter’s, Tettenhall Regis, Tettenhall Wightwick, Wednesfield North and Wednesfield South.

Political parties

22 Heath Town Branch Labour Party opposed the City Council’s main proposals for Wednesfield, and proposed an alternative boundary between Wednesfield South and Heath Town wards. It further proposed that the Park Village area and Bentley Bridge development be in Heath Town ward. Wednesfield Conservatives supported the Council’s eastern alternative option for the Wednesfield wards. Wolverhampton North East Liberal Democrats opposed the City Council’s proposals to retain the area to the south of Three Tuns Lane in Bushbury ward, arguing that it should be transferred to Oxley ward.

Local community groups and residents’ associations

23 Moathouse Tenants’ and Residents’ Association supported the majority of the City Council’s main proposals for the Wednesfield wards. However, it also argued that the Bentley Bridge area should be in Wednesfield South ward. East Fowlers Tenants’ & Residents’ Association, Eversley Tenants’ & Residents’ Association, Springfield Community Association, Tithe Road/Wood End/Amos Lane Tenants’ and Residents’ Association and Wolverhampton 54/55/56 Beats Focus Group all opposed the Council’s main proposals. They all echoed Heath Town

Labour Party's proposals to transfer the Park Village and Bentley Bridge areas into Heath Town ward. East Fowlers Tenants' & Residents' Association submitted a petition from local residents of Park Village to this effect. Eversley Tenants' & Residents' Association, Tithe Road/Wood End Road/Amos Lane Tenants' & Residents' Association and Wolverhampton 54/55/56 Beats Focus Group all further proposed that Heath Town ward be renamed New Cross ward.

24 Tettenhall Wood Network opposed the Council's main proposal for the Tettenhall wards, stating that it was divisive for the Tettenhall Wood area. Tettenhall & Tettenhall Wood Tenants' & Residents' Association echoed this view, and particularly supported the western alternative submitted by the Council. The Tettenhall & District Residents' Police Liaison Committee strongly opposed the Council's main proposal and supported the western alternative. Pendeford Agencies Link Scheme (P.A.L.S.) supported the Council's proposal to transfer the Pendeford Estate from Tettenhall Regis ward into Oxley ward.

Other representations

25 Councillor Duhra, member for St Peter's ward, opposed the City Council's western alternative proposal to transfer the Dunstall and Whitmore Reans areas from St Peter's ward into Oxley ward. He included a petition signed by local residents to this effect. Councillor Jones supported the Council's main proposal in full. He also specifically opposed the western alternative proposal to transfer the Dunstall and Whitmore Reans areas into Oxley ward. Councillor Turner opposed the proposed Heath Town ward and suggested that the proposals submitted by the City Council could be seen as gerrymandering.

26 Ten representations were received from residents of Vicarage Road and the Nordley Hill area. All supported the City Council's main proposal for Wednesfield South, but they further argued that the area immediately to the east of New Cross hospital should also be transferred into a Wednesfield ward. One resident of the Dovecotes Estate in Pendeford opposed the City Council's proposal to transfer this estate from Tettenhall Regis ward into Oxley ward.

27 A local resident made proposals regarding county and town council electoral arrangements and parliamentary constituencies. St John's Urban Village provided information regarding the development of the area, although it made no specific proposals.

4 ANALYSIS AND DRAFT RECOMMENDATIONS

28 We have not finalised our conclusions on the electoral arrangements for Wolverhampton and welcome comments from all those interested relating to the proposed ward boundaries, number of councillors and ward names. We will consider all the evidence submitted to us during the consultation period before preparing our final recommendations.

29 As described earlier, the prime aim in considering the most appropriate electoral arrangements for Wolverhampton is to achieve electoral equality. In doing so we have regard to section 13(5) of the Local Government Act 1992 (as amended): the need to secure effective and convenient local government; reflect the identities and interests of local communities; and secure the matters referred to in paragraph 3(2)(a) of Schedule 11 to the Local Government Act 1972 (equality of representation). Schedule 11 to the Local Government Act 1972 refers to the number of electors per councillor being 'as nearly as may be, the same in every ward of the district or borough'.

30 In relation to Schedule 11, our recommendations are not intended to be based solely on existing electorate figures, but also on estimated changes in the number and distribution of local government electors likely to take place over the next five years. We must also have regard to the desirability of fixing identifiable boundaries and to maintaining local ties.

31 It is therefore impractical to design an electoral scheme which results in exactly the same number of electors per councillor in every ward of an authority. There must be a degree of flexibility. However, our approach, in the context of the statutory criteria, is that such flexibility must be kept to a minimum.

32 We accept that the achievement of absolute electoral equality for an authority as a whole is likely to be unattainable. However, we consider that, if electoral imbalances are to be minimised, the aim of electoral equality should be the starting point in any review. We therefore strongly recommend that, in formulating electoral schemes, local authorities and other interested parties should make electoral equality their starting point, and then make adjustments to reflect relevant factors such as community identity and interests. Five-year forecasts of changes in electorate must also be considered, and we would aim to recommend a scheme which provides improved electoral equality over this five-year period.

Electorate forecasts

33 Since 1975 there has been a 4% decrease in the electorate of Wolverhampton. The City Council submitted electorate forecasts for the year 2006, projecting a further slight decrease in the electorate, from 183,306 to 182,900, over the five-year period from 2001 to 2006. In order to prepare these forecasts, the Council estimated rates and locations of housing development with regard to structure and local plans, the expected rate of building over the five-year period and assumed occupancy rates. Advice from the City Council on the likely effect on electorates of changes to ward boundaries has been obtained.

34 We know that forecasting electorates is difficult and, having considered the City Council's figures, accept that they are the best estimates that can reasonably be made at this time.

Council size

35 Wolverhampton City Council presently has 60 members. At Stage One, the City Council proposed retaining a council of 60 members. In its original submission, the City Council stated that 'all three political groups on the Council are firmly of the view that 60 Councillors elected

from 20 wards represents the most effective and convenient means of delivering the Council's functions in the future'. The Council cited the existing councillor:elector ratio, its new political management system and the constituency role of members as justification for retaining the existing council size, stating that 'the continued involvement of all 60 councillors is vital to its future success'.

36 Two further submissions regarding council size were received during Stage One. Tettenhall Wood Network stated that it 'formally reserved its position, at this time, with regard to the ratio of councillors and wards per elector'. Tettenhall and Tettenhall Wood Tenants' and Residents' Association stated that it also wished to 'pass by without comment the number of councillors remaining at 60', although it added that 'comparison with similarly populated MBCs [metropolitan borough councils] show this may be on the high side especially with a Cabinet Structure and Local Area Forums'.

37 Having carefully considered the City Council's argumentation regarding the retention of a council size of 60, the Committee was of the opinion that, while the general argumentation provided was adequate, further evidence of how Wolverhampton City Council in particular currently operates and why the retention of 60 councillors would provide more effective and convenient local government than any other council size was necessary. Accordingly, the Committee requested further evidence to this effect from the City Council, which was provided. The Council supplied more thorough details of the new decision-making system in operation in Wolverhampton, and the attendance details for councillors on local committees and partnership agenda bodies, and in scrutiny roles.

38 Having considered all proposals regarding council size received during Stage One, we are content to recommend the retention of 60 councillors to represent Wolverhampton. We acknowledge the consensus from the three political groups represented on the City Council, and the broad local support shown in the Council's consultation feedback provided with its submission. We consider the more detailed evidence provided at our request to be sufficient to justify the retention of the existing council size. We note the representations from Tettenhall Wood Network and Tettenhall and Tettenhall Wood Tenants' and Residents' Association, however no alternative council size was proposed. It should be further be noted that, as stated in the *Guidance*, 'in considering the issue of council size, we are of the view that each area should be considered on its own merits and that The Boundary Committee for England should not aim for equality of council size between authorities of similar types and populations'. We therefore cannot consider Tettenhall and Tettenhall Wood Tenants' and Residents' Association's comment regarding council size.

39 Therefore, having looked at the size and distribution of the electorate, the geography and other characteristics of the area, together with the responses received, we conclude that the achievement of electoral equality and the statutory criteria would best be met by a council of 60 members.

Electoral arrangements

40 In view of the degree of consensus behind large elements of the Council's proposals, and the consultation exercise which it undertook with interested parties, we have based our recommendations on the City Council's main proposals. We note the consensus between the three political groups on the City Council for 10 of the proposed wards and intend adopting the City Council's proposed wards as part of our draft recommendations, subject to two amendments to better reflect communities. We have considered the submissions received regarding the alternative options submitted by the City Council on behalf of the Conservative Group on the Council, but we have not been persuaded by the evidence provided that they would secure a better balance between the statutory criteria. We are concerned that there may be a political dimension in relation to the conflicting arguments received, in particular for the Wednesfield area. We note that submissions received regarding this area have been

contradictory in nature, with residents of the Nordley Hill area suggesting that they more readily identify with Wednesfield, and political and community groups suggesting that the area around Wednesfield Town centre more readily identifies with Heath Town ward.

41 We consider that the City Council's main proposal would provide a better balance between electoral equality and the other statutory criteria than the current arrangements or other schemes submitted at Stage One. However, to improve electoral equality further and having regard to local community identities and interests, we have decided to move away from the City Council's proposals in four areas: Bilston East, Ettingshall, Penn/Merry Hill and St Peter's. For city warding purposes, the following areas, based on existing wards, are considered in turn:

- (a) Park, St Peter's, Tettenhall Regis and Tettenhall Wightwick wards;
- (b) Bushbury, Fallings Park, Low Hill and Oxley wards;
- (c) Heath Town, Wednesfield North and Wednesfield South wards;
- (d) Bilston East, Bilston North, East Park, Ettingshall and Spring Vale wards;
- (e) Blakenhall, Graiseley, Merry Hill and Penn wards.

42 Details of our draft recommendations are set out in Tables 1 and 2, and illustrated on Map 2, in Appendix A and on the large maps.

Park, St Peter's, Tettenhall Regis and Tettenhall Wightwick wards

43 These four wards are situated in the centre and west of the city, and are each represented by three councillors. Under the existing arrangements, the number of electors per councillor in both Park and St Peter's wards is 12% above the city average (11% and 27% above the city average by 2006). The number of electors per councillor in Tettenhall Regis and Tettenhall Wightwick wards is 1% above and 1% below the city average (2% below the city average in both wards by 2006).

44 During Stage One, 10 representations were received regarding these wards. As detailed previously, the City Council submitted a western alternative affecting these wards in addition to its main proposal. Both the City Council's main proposal and its western alternative recognised that, although the levels of electoral equality in the Tettenhall wards are acceptable under the existing arrangements, boundary modifications were necessary in order to accommodate revised warding arrangements in Park and St Peter's wards, both of which are forecast to be under-represented by 2006, and in order to facilitate a better balance of representation across the city as a whole. In its main proposal, the Council proposed the transfer of the area to the south-west of Horden Road and Hunter Street from St Peter's ward into Park ward. The Council also proposed that an area of the existing Park ward be transferred into Tettenhall Wightwick ward, arguing that this area (to the south-west of Finchdene Grove, Sycamore Drive, The Pines, The Spinney, The Parklands and Finchfield Hill) has 'been identified as appropriate to move into Tettenhall Wightwick ward ... this area was part of the old Tettenhall UDC prior to 1966 and so has an historical correlation to the ward into which it is moving'. The Council acknowledged that the resultant boundary between Park and Tettenhall Wightwick wards did 'not meet with the Council's aim to use easily identifiable geographic boundaries'. However, it argued that it was desirable to move two whole polling districts 'in order not to split minor roads between wards'.

45 The City Council acknowledged that significant modifications would be necessary to the boundaries of St Peter's ward, as it is forecast to be considerably under-represented by 2006 due to the significant development planned for the town centre. As a consequence, the Council proposed transferring the area to the south-west of Horden Road and Hunter Street into Park ward, detailed previously, and areas to the east of the Ring Road, Stafford Street and Stafford Road into East Park, Heath Town and Low Hill wards. This would utilise the Ring Road, Stafford Street and Stafford Road as easily identifiable boundaries for the east of the revised St Peter's ward. The Council further proposed that the area to the south of Snowdon Way, Logan Close and Leverton Rise be transferred from Oxley ward into St Peter's ward.

46 As part of the City Council's proposals to secure a better balance of representation in the north and east of the city, it proposed transferring The Dovecotes Estate in Pendeford from Tettenhall Regis ward into Oxley ward, therefore using the railway line as a boundary between the two wards. Although the Council acknowledged that this provoked 'divided feelings', it recognised that 'it does have the benefit of uniting the two parts of the Pendeford Estate'. The Council further proposed transferring an area of Tettenhall Wood from Tettenhall Wightwick ward into Tettenhall Regis ward. The proposed southern boundary of Tettenhall Regis ward would run along the centre of Wergs Road to the junction with Regis Road, then west along the rear of the properties on the south side of Regis Road to the junction with Woodhouse Road North. The boundary would then run south, to the rear of the properties on the east side of Woodhouse Road North, Regina Crescent, Kinfare Road and Oak Green, before turning west along the rear of the properties on the north side of Woodland Avenue. The boundary would then run north-west along the centre of School Road to meet the city boundary. All electors north-west of this boundary, currently in Tettenhall Wightwick ward, would be transferred into Tettenhall Regis ward under the Council's main proposals for these wards. The Council acknowledged that this specific boundary had 'generated a great deal of local feeling and a number of representations have been received from residents who object to this change on the basis that it will divide local communities in the Tettenhall Wood area' and that the proposed boundary 'does not follow easily identifiable geographical boundaries', but that 'these adjustments meet the numerical objective for Tettenhall Regis ward'.

47 As detailed previously, the Council submitted a western alternative, affecting these wards and Oxley ward, on behalf of the Conservative Group on the Council. Under the Council's western alternative, both Tettenhall wards would remain unchanged. In order to address the levels of electoral inequality in St Peter's ward, the Council proposed transferring an area of Dunstall and Whitmore Reans from St Peter's ward into Oxley ward. The proposed boundary between these two wards would run south-east along the Birmingham Canal, from its intersection with the Staffordshire and Worcestershire Canal, before running south and south-west to the rear of the properties to the west of The Chase and Dales Close and to the north of Paddock View, Haydock Close, Uttoxeter Close, Cheltenham Close and Newmarket Close and to the west and south of Armstrong Drive. The boundary would then run along the centre of Dunstall Lane and Dunstall Road to Five Ways roundabout and the junction with Stafford Road. Those electors to the north and east of this proposed boundary would be transferred from St Peter's ward into Oxley ward. The remainder of the existing Oxley ward would be retained.

48 As a consequence of the above proposal, and in order to reduce the levels of electoral inequality in Park ward, under the City Council's western alternative those electors to the north of Tettenhall Road and Albert Road and to the west of Clifford Street, currently in Park ward, would be transferred into St Peter's ward. The Council argued that the western alternative 'uses easily identifiable boundaries that follow the centre of roads and dispenses with the indistinct boundaries', however it acknowledged that the area transferred from St Peter's ward into Oxley ward, detailed above, 'has little relationship to the residential areas in the north of [Oxley] ward'.

49 Under the City Council's main proposals, the number of electors per councillor in Park, St Peter's, Tettenhall Regis and Tettenhall Wightwick wards would be 2% above, 6% below, 2% below and equal to the city average initially (equal to, 3% above, 4% below and 1% below the city average by 2006, respectively). Under the City Council's western alternative option, the number of electors per councillor in these wards would be 2% below, 6% below, 1% above and 1% below the city average initially (3% below, 2% above, 2% below and 2% below the city average by 2006, respectively).

50 Nine further representations were received regarding these wards. As detailed previously, the Conservative Group on the Council supported the City Council's western alternative for these wards, arguing that the existing Tettenhall wards fulfil the electoral equality criterion and should not be modified. It argued that the Council's main proposal for the boundary between

Park and Tettenhall Wightwick wards follows an 'indistinct, meandering route between the rear curtilages of the houses' and that the main proposal would be divisive to the Tettenhall Wood community. It further opposed transferring The Dovecotes Estate from Tettenhall Regis ward into Oxley ward. It concluded that the City Council's western alternative 'reflects the concerns of the public, avoids unnecessary alteration to current wards and preserves community links, while addressing the current electoral imbalance'.

51 Councillor Duhra submitted a petition from local residents of Whitmore Reans and Dunstall, opposing the City Council's western alternative, stating that he 'strongly objects' to the proposal to include these areas with the remainder of Oxley ward. Councillor Jones fully supported the City Council's main proposals for these wards, in particular the transfer of the Dovecotes Estate into Oxley ward. He also opposed the Council's western alternative option, in particular the transfer of the Whitmore Reans and Dunstall areas into Oxley.

52 Tettenhall Wood Network opposed the City Council's main proposal for the Tettenhall wards, stating that the proposal was 'divisive towards the neighbourhood of Tettenhall Wood'. It argued that the Council's main proposal moved too many electors in order to balance electoral equality in other areas of the city, and resulted in a boundary which followed a 'tortuous and convoluted path'. It further stated its support for the City Council's western alternative, which, it stated, 'satisfies all community objections in regard to those communities located within the Tettenhall wards'. Tettenhall & Tettenhall Wood Tenants' & Residents' Association opposed the Council's main proposal for these wards, claiming that 'the main proposal is for possible electoral gain whereas the western alternative is politically neutral and maintains the status quo'. Tettenhall & District Residents Police Liaison Committee also stated its opposition to the Council's main proposal for these wards, and supported the western alternative.

53 Pendeford Agencies Link Scheme (P.A.L.S.) stated its support for the City Council's main proposal to transfer The Dovecotes Estate from Tettenhall Regis ward into Oxley ward. St John's Urban Village provided information regarding the development of Wolverhampton City Centre, although it made no specific comments regarding the Periodic Electoral Review. A local resident of Pendeford opposed the Council's main proposal to transfer The Dovecotes Estate from Tettenhall Regis ward into Oxley ward.

54 We have carefully considered all representations received regarding these wards during Stage One. We acknowledge that, although the existing levels of electoral equality are acceptable in the Tettenhall wards, modifications to their boundaries are required due to imbalance in Park and St Peter's wards, and in order to secure a better balance of representation across the city, especially in the wards in the north and east of the city. We note that consensus has not been achieved between the political groups on the Council with regard to these wards. However, having considered all representations received during Stage One, we are content to base our draft recommendations for these wards on the City Council's main proposals. We believe that these proposals strike a better balance between our statutory criteria than the existing arrangements or any other proposal received during Stage One. We agree with the Council's view that those electors in the Whitmore Reans and Dunstall areas share little sense of community identity with the remainder of the proposed Oxley ward, to the north of Oxley Golf Course, and do not propose adopting this boundary as part of our draft recommendations. As a consequence, our capacity to adopt the remainder of the western alternative is limited. Officers from the Committee, having visited the area, are of the opinion that The Dovecotes Estate shares more community affinity to the remainder of Pendeford, to the north of the Shropshire Union Canal, than to the area to the south of the railway line in Tettenhall Regis ward. We are therefore content to adopt the Council's main proposal for these wards. Although we recognise that the boundary between Tettenhall Regis and Tettenhall Wightwick wards effectively divides the Tettenhall Wood area, uniting the Tettenhall Wood area by using the southern edge of Woodthorne and Regis schools would result in the number of electors per councillor in Tettenhall Regis ward being 13% below the city average by 2006. We therefore propose adopting the Council's main proposals for Park, Tettenhall Regis and

Tettenhall Wightwick wards without modification. However, we would welcome views on this issue during Stage Three.

55 Having considered the Council's main proposal for St Peter's ward, we were concerned that the area of All Saints, to the south of the Ring Road, shares little in common with the remainder of the ward. Officers from the Committee, having visited the area, are of the opinion that this area more readily identifies with the Ettingshall area immediately to the south. We therefore propose transferring this area into Ettingshall ward, and therefore utilising the entirety of the southern side of the Ring Road as the southern boundary of St Peter's ward. As a consequence of this amendment, we propose a minor modification to the Council's proposed boundary between St Peter's and Oxley wards. We propose transferring all properties to the south of Oxley Golf Course into St Peter's ward, in order to improve the level of electoral equality, given our proposals for the All Saints area. Although the levels of electoral equality would deteriorate slightly under our proposals, we believe that this is justifiable given the better reflection of communities achieved. Subject to these amendments, we propose adopting the Council's main proposal for St Peter's ward, as we believe it strikes the best balance between our statutory criteria.

56 Under our draft recommendations, the number of electors per councillor in Park, Tettenhall Regis and Tettenhall Wightwick wards would be the same as under the City Council's main proposals. The number of electors per councillor in St Peter's ward would be 11% below the city average initially (8% below by 2006). Our draft recommendations are set out in Tables 1 and 2, and illustrated on Map 2, in Appendix A and on the large maps.

Bushbury, Fallings Park, Low Hill and Oxley wards

57 These four wards are situated in the north of the city, and are each represented by three councillors. Under the existing arrangements, the numbers of electors per councillor in Bushbury, Fallings Park, Low Hill and Oxley wards is 4% below, 10% below, 6% below and 5% above the city average (5% below, 12% below, 8% below and 2% above the city average by 2006).

58 During Stage One, three representations were received regarding these wards. As detailed previously, the City Council submitted a western alternative affecting Oxley ward and a north-east alternative affecting Low Hill and Fallings Park wards, as well as its main proposal for all wards. Under its main proposal, the Council proposed that the area to the south of Snowdon Way, Logan Close and Leverton Rise be transferred from Oxley ward into St Peter's ward, as detailed previously. It argued that these roads 'comprise a small, recently built estate that has very little historical association with Oxley ward'. In order to address the inequalities in Bushbury, Low Hill and Fallings Park wards, the Council's main proposal would transfer the Fordhouses area (the area to the north of Marsh Lane and east of the Staffordshire and Worcestershire Canal, currently in Oxley ward) into Bushbury ward. As detailed previously, that area to the east of the Stafford Road, currently in St Peter's ward, would be transferred into Low Hill ward. Similarly, the area to the east of Stafford Road and south of Wingfoot Park and Elston Hall Road, currently in Bushbury ward, would be transferred into Low Hill ward under the Council's main proposals. The Council argued that this area 'has as much association with Low Hill ward as they have with Bushbury and generally embrace complete housing communities'.

59 The City Council recognised that Fallings Park is 'the smallest ward based on a projection of the current electorate statistics' and therefore proposed transferring into it two areas from Low Hill ward. The Council proposed moving the western boundary of Fallings Park ward to the centre of Bushbury Road and Old Fallings Lane, thereby transferring all electors to the east of these roads, currently in Low Hill ward, into Fallings Park ward. The Council argued that this would reunite the Scotlands Estate, which 'forms a single community... however it [currently] has a ward boundary dividing it into two parts'. The Council further proposed that the electors to the east of Cannock Road, north of Victoria Road and west of Bushbury Road be transferred

from Low Hill ward into Fallings Park ward. The remainder of Fallings Park ward's boundaries would be retained.

60 As detailed previously, the Council proposed a north-east alternative affecting Low Hill and Fallings Park wards, which was supported by the Conservative Group on the Council. The boundary between Low Hill ward and Oxley, St Peter's and Bushbury wards would be the same as under the Council's main proposal. To the east, the area of the Scotlands Estate to be transferred into Low Hill ward from Fallings Park ward under the Council's main proposal, as detailed previously, would remain unchanged. However, the area to the south and east of Park Lane and north of Cannock Road, currently in Low Hill ward, would be transferred into Fallings Park ward. The Council stated that 'this district is self-contained with good boundaries along busy roads and could be accepted in either Low Hill or Fallings Park wards'.

61 Under the City Council's main proposals, the number of electors per councillor in Bushbury, Fallings Park, Low Hill and Oxley wards would be 2% above, 4% above, equal to and 4% above the city average initially (1% below, 2% above, 1% below and 2% above the city average by 2006, respectively). Under the City Council's north-east alternative option, the number of electors per councillor in Fallings Park and Low Hill wards would be equal to and 4% above the city average initially (2% below and 3% above the city average by 2006). Under the City Council's western alternative, detailed previously, the number of electors per councillor in Oxley ward would be 7% above the city average initially (4% above by 2006).

62 Two further representations were received regarding these wards during Stage One. As detailed previously, the Conservative Group on the Council supported the western alternative option for Oxley ward. It also supported the Council's north-east alternative option for Fallings Park and Low Hill wards on the grounds of electoral equality and community identity. It argued that electors in the area to the north and west of Cannock Road, and east of south of Park Lane, 'have never considered themselves as residents of Low Hill and would see themselves as having greater affinity with Fallings Park'.

63 Wolverhampton North East Liberal Democrats opposed the City Council's proposals for Bushbury ward, arguing that the electors 'south of Elston Hall Lane did not wish to be associated with Poet's Corner' and that the area south of Stafford Road 'has stronger ties with Oxley than with Bushbury'.

64 We have carefully considered all representations regarding these wards received during Stage One. As detailed previously, we do not consider that the Council's western alternative for Oxley ward best reflects the local communities and we do not intend adopting it as part of our draft recommendations. Having considered Wolverhampton North East Liberal Democrats' opposition to the Council's proposals for Bushbury ward, we note that adopting the Liberal Democrats' proposal to transfer the area south of Stafford Road currently in Bushbury ward into Oxley ward would result in the number of electors per councillor in Bushbury and Oxley wards deteriorating to 7% below and 5% above the city average by 2006. We do not consider this amendment to better reflect the communities or provide for more convenient and effective local government, and do not intend adopting it. Having considered both the Council's main proposal and its north-east alternative for Fallings Park and Low Hill wards, we are content to recommend the Council's main proposal for these wards, as we believe that it strikes the best balance between our statutory criteria. We note that it uses strong boundaries and unites the Scotlands Estate in a single ward. We therefore intend adopting the Council's main proposal for Bushbury, Fallings Park and Low Hill wards without modification, and its main proposal for Oxley ward subject to the amendment to its boundary with St Peter's ward, detailed previously.

65 Under our draft recommendations, the number of electors per councillor in Bushbury, Fallings Park and Low Hill wards would be the same as under the City Council's main proposals. The number of electors per councillor in Oxley ward would be 2% above the city

average initially (equal to the city average by 2006). Our draft recommendations are set out in Tables 1 and 2, and illustrated on Map 2, in Appendix A and on the large maps.

Heath Town, Wednesfield North and Wednesfield South wards

66 These three wards are situated in the north-east of the city, and are each represented by three councillors. Under the existing arrangements, the numbers of electors per councillor in Heath Town, Wednesfield North and Wednesfield South wards is 12%, 3% and 3% below the city average (10%, 6% and 3% below the city average by 2006).

67 During Stage One, 22 representations were received regarding these wards. The City Council submitted an eastern alternative affecting all three wards, as well as its main proposal. As detailed previously, an area to the east of Stafford Street and the Ring Road and south of Cannock Road would be transferred from St Peter's ward into Heath Town ward. The Council argued that this area 'has a greater affinity to the Park Village area of Heath Town than ... St Peter's ward'. The Council further proposed transferring the Bentley Bridge development from Wednesfield South ward into Heath Town ward, stating that it 'has a greater geographical association with the Heath Town area than Wednesfield South, where the main residential areas are over a mile away'. The Council noted that the existing ward boundary between Wednesfield South and Heath Town wards includes the Nordley Hill area in Heath Town ward. It stated that 'there is still a pronounced feeling of community identity and local history amongst residents ... a number of representations have been received from local people requesting that the Nordley Hill area is moved into a Wednesfield ward' and that 'this area is considered by many to be a natural extension of Wednesfield Village'. Consequently, the Council proposed transferring the area to the east of Wednesfield Park, north of the Wyrley and Essington Canal and south of Amos Lane from Heath Town ward into Wednesfield South ward. As a consequence of this proposal, and to improve the level of electoral equality in Wednesfield North ward, the Council proposed to transfer the Wood End area (that area to the west of Wood End Road currently in Wednesfield South ward) into Wednesfield North ward, with which, the Council argued, it has a 'natural affinity'.

68 The City Council's eastern alternative option for these wards would propose the same arrangements for utilising the Ring Road and Stafford Street as the boundary between Heath Town ward and St Peter's ward. However, the Wyrley and Essington Canal would be utilised as the boundary between both Heath Town and Wednesfield North wards and Wednesfield South ward (with one exception, detailed below), thus retaining the Bentley Bridge development in Wednesfield South ward. The Council further proposed transferring the area to the east of Amos Lane from Wednesfield South ward into Wednesfield North ward, and transferring the area of Wednesfield North ward bounded by the city boundary, Lichfield Road and the Wyrley and Essington Canal into Wednesfield South ward. The boundary between the two Wednesfield wards would therefore run along Lichfield Road from the city boundary to the Wyrley and Essington Canal. This would be the only instance of the boundary between these wards departing from the canal, as detailed earlier.

69 Under the City Council's main proposals, the number of electors per councillor in Heath Town, Wednesfield North and Wednesfield South wards would be 14% below, 2% above and 4% below the city average initially (4%, 1% and 6% below the city average by 2006). Under the City Council's eastern alternative option, the number of electors per councillor in these wards would be 12% below, 1% above and 4% below the city average initially (4%, 3% and 4% below the city average by 2006, respectively).

70 A further 21 representations were received regarding these wards during Stage One. The Conservative Group on the Council supported the Council's eastern alternative option for these wards. It stated that there had been 'great objection to the movement of DK polling district [part of the Nordley Hill area] into Wednesfield South from Heath Town from residents both in Heath Town and Wednesfield South'. It further argued that the Bentley Bridge area should remain in

Wednesfield South ward, as those electors 'see themselves as Wednesfield residents rather than living in Heath Town'.

71 Councillor Jones supported the Council's main proposals for these wards, arguing that 'anyone only has to visit the area to see the logic of the Council's proposals'. He further argued that the Bentley Bridge area 'is clearly associated with Heath Town' rather than Wednesfield South. Councillor Turner objected to all proposals for Heath Town ward. Wednesfield Conservatives opposed the Council's main proposal for these wards and fully supported the eastern alternative.

72 Moathouse Tenants' & Residents' Association supported the majority of the Council's main proposal for these wards, but argued that the Bentley Bridge area should be in Wednesfield South ward. Heath Town Branch Labour Party proposed retaining Pinfold Gardens, Duke Street, Taylor Street, Lichfield Road, Hampstead Close, Tithe Road, Wood End Road and Amos Lane in Heath Town ward. It further suggested that polling district EI (the Park Village area) be transferred from Low Hill ward into Fallings Park ward. It also opposed the Council's main proposal for these wards, in particular the transfer of the Bentley Bridge area from Wednesfield South ward into Heath Town ward. East Fowlers Tenants' & Residents' Association, Eversley Tenants' & Residents' Association, Springfield Community Association, Tithe Road/Wood End Road/Amos Lane Tenants' & Residents' Association and Wolverhampton 54/55/56 Beats Focus Group all echoed these arguments. Eversley Tenants' & Residents' Association, Tithe Road/Wood End Road/Amos Lane Tenants' & Residents' Association and Wolverhampton 54/55/56 Beats Focus Group further proposed that Heath Town ward be renamed New Cross ward, in order to better reflect the diverse communities within the ward. East Fowlers Tenants' & Residents' Association also proposed that polling district EI be transferred from Low Hill ward into Heath Town ward. It submitted a petition to this effect.

73 Ten residents of Vicarage Road and East Avenue supported the inclusion of polling district DK (part of the Nordley Hill area) in Wednesfield South ward, but they further argued that the remainder of the Nordley Hill area (the area to the east of New Cross Hospital) be transferred into Wednesfield South ward, in the interests of community identity.

74 We have carefully considered all representations received regarding these wards during Stage One. As detailed previously, we were concerned by the contradictory nature of the arguments received regarding the Nordley Hill and Wednesfield Village area, in particular the fact that the Council and residents of Vicarage Road and the Nordley Hill areas consider these areas to be part of the Wednesfield community, and yet local political groups and community associations consider those electors immediately to the north of Wednesfield Village to associate more with Heath Town ward. In the light of these submissions, we are concerned that there may be a political dimension in regard to these wards. Our draft recommendations take no account of possible political advantage and are based on striking the best balance between our statutory criteria. With this in mind, and since officers from the Committee have visited the area, we are of the opinion that both areas in question share more community identity with Wednesfield Village. We further agree that all properties to the east of New Cross Hospital would be better reflected within a Wednesfield ward. However, this would result in unacceptable levels of electoral equality in both wards. We also note the general support for uniting the Wood End area in Wednesfield North ward. We are therefore content to adopt the City Council's main proposal for this area.

75 In considering the recent Bentley Bridge development, we note that the geographical boundaries surrounding it are such that it does not particularly share community affinity with either Heath Town or Wednesfield. However, as a consequence of our decision to adopt the Council's main proposals for the Wednesfield area, we intend adopting the Council's main proposal to transfer the Bentley Bridge area into Heath Town ward. We also note that there is a significant amount of industrial and commercial land separating this area from Wednesfield Village centre, and that some local support has been received for this proposal.

76 In considering the proposals to transfer the area of Park Village from Low Hill and St Peter's wards into Heath Town ward, we note that the number of electors per councillor in Heath Town, Low Hill and St Peter's wards would deteriorate to 8% above, 9% below and 9% below the city average by 2006 under these proposals. We do not consider that these proposals improve the reflection of community identity enough to justify such a deterioration in the levels of electoral equality, and further note that the Council's main proposals for these wards use strong, readily identifiable boundaries. We therefore intend adopting the Council's main proposals for Heath Town, Wednesfield North and Wednesfield South wards, as we believe that they strike the best balance between our statutory criteria.

77 Under our draft recommendations, the number of electors per councillor in Heath Town, Wednesfield North and Wednesfield South wards would be the same as under the City Council's main proposals. Our draft recommendations are set out in Tables 1 and 2, and illustrated on Map 2, in Appendix A and on the large maps.

Bilston East, Bilston North, East Park, Ettingshall and Spring Vale wards

78 These five wards are situated in the east and south-east of the city, and are each represented by three councillors. Under the existing arrangements, the numbers of electors per councillor in Bilston East and Bilston North wards is 8% below and 16% above the city average (5% below and 16% above the city average by 2006). The number of electors per councillor in East Park, Ettingshall and Spring Vale wards is 16% below, 6% below and 10% above the city average (13% below, 3% below and 7% above the city average by 2006).

79 During Stage One, two representations were received regarding these wards. The City Council proposed a number of modifications to the existing boundaries of these wards. As detailed previously, the Council proposed moving the boundary between St Peter's and East Park wards to follow the Ring Road, thus transferring those electors to the east of the Ring Road into East Park ward. The Council recognised that East Park ward has insufficient electors under the existing arrangements and therefore additional electors were required. As a consequence, it proposed transferring the area to the north of Moseley Road, Hill Road, Vaughan Road and Dilloways Lane, currently in Bilston North ward, into East Park ward. The City Council acknowledged that there was 'little natural association between the electors moved from Bilston North and the rest of East Park ward'. However, it recognised that the electorate of East Park ward needed to be increased and that of Bilston North ward needed to be decreased, arguing that the existing boundaries of Bilston North ward 'follow obvious and very logical routes to form a ward that is extremely difficult to reduce in size' and that 'no better solution to the problem could be found'.

80 The Council proposed one further amendment to the existing boundaries of Bilston North ward, transferring those few electors to the south of Bilston Road, currently in Bilston North ward, into Bilston East ward. It also proposed transferring the entirety of the Ladymoor Estate from Ettingshall ward into Bilston East ward. The Council noted that this area is 'isolated from the rest of [Ettingshall] ward by a large industrial estate'. The boundary between Bilston East and Ettingshall wards would therefore run along the railway line, before turning east along Black Country Route and running south to meet the existing boundary in the grounds of Bilston Community College. As a consequence of transferring this area from Ettingshall ward, and in order to improve the levels of electoral equality in Ettingshall and Spring Vale wards, the Council proposed transferring those electors to the north and east of Black Country Route, Birmingham New Road and Spring Road, and to the south of Spring Road Industrial Estate, currently in Spring Vale ward, into Ettingshall ward. The Council argued that 'this estate is not considered to have a greater affinity to the ward that it is leaving than to Ettingshall ward'. The Council further proposed transferring a small area of industrial land in Ettingshall, to the south of Dimmock Street, Attwood Gardens, Bowen Street, Penhallow Drive, Hardon Road and Taylor Road, which have residential development planned before 2006, into Spring Vale ward.

81 Under the City Council's main proposals, the number of electors per councillor in Bilston East and Bilston North wards would be 4% below and 2% above the city average initially (1% below and 3% above the city average by 2006). The number of electors per councillor in East Park, Ettingshall and Spring Vale wards would be equal to, 3% above and 3% below the city average initially (2% above, 1% above and equal to the city average by 2006).

82 One further representation was received regarding these wards. The Conservative Group on the Council fully supported the City Council's main proposals for these wards.

83 We have carefully considered the representations received regarding these wards during Stage One. We note the consensus received from the three political groups on the Council, and are content to base our draft recommendations for these wards on the Council's proposals. However, we intend to depart from its proposals in two areas. As detailed previously, officers from the Committee, having visited the area, are concerned that the All Saints area identifies more readily with Ettingshall ward. We therefore intend transferring this area from St Peter's ward into Ettingshall ward. We consider that this proposal better reflects the communities and provides for more effective and convenient local government in both Ettingshall and St Peter's wards. As a consequence of this proposal, and to improve the reflection of communities in Bilston, we propose making a modification to the City Council's proposed boundary between Ettingshall and Bilston East wards. We note that, under the Council's main proposal, the Ladymoor area of Ettingshall ward would be transferred into Bilston East ward. However, we also note that access between this area and the remainder of the ward is limited, passing through the boundary with Dudley Borough Council, or through Ettingshall ward. We also note that the boundary between these two wards dissects Bilston Town Centre. Therefore, in order to improve access to the Ladymoor area and to better reflect the Bilston community by transferring the majority of Bilston Town Centre into Bilston East ward, we propose transferring the area to the east of Wolverhampton Street and south of Shale Street, currently in Ettingshall ward, into Bilston East ward. We recognise that electoral equality deteriorates in these wards under our draft recommendations. However, we consider that this is justified given the better reflection of communities and more identifiable boundaries achieved under our proposals.

84 Under our draft recommendations, the number of electors per councillor in Bilston North, East Park and Spring Vale wards would be the same as under the City Council's main proposals. The number of electors per councillor in Bilston East and Ettingshall wards would be 1% and 6% above the city average initially (4% and 8% above the city average by 2006). Our draft recommendations are set out in Tables 1 and 2, and illustrated on Map 2, in Appendix A and on the large maps.

Blakenhall, Graiseley, Merry Hill and Penn wards

85 These four wards are situated in the south and south-west of the city, and are each represented by three councillors. Under the existing arrangements, the numbers of electors per councillor in Blakenhall, Graiseley, Merry Hill and Penn wards is 2% below, equal to, 5% above and 9% above the city average (3% below, 2% above, 2% above and 7% above the city average by 2006).

86 During Stage One, two representations were received regarding these wards. The City Council acknowledged that these wards all achieved reasonable levels of electoral equality and used strong, well defined and easily identifiable boundaries under the existing arrangements. It therefore proposed retaining the existing Blakenhall and Graiseley wards as part of its main proposal. It proposed a minor amendment to the boundary between Merry Hill and Penn wards, transferring the electors living to the south of Springhill Lane and east of Warstones Road, currently in Penn ward, into Merry Hill ward. The Council argued that this was proposed 'to benefit neighbouring Penn ward', in order to improve the level of electoral equality. The Council proposed retaining the remainder of the existing boundaries for Merry Hill and Penn wards.

87 Under the City Council's main proposals, the number of electors per councillor in Blakenhall and Graiseley wards would be the same as under the existing arrangements. The number of electors per councillor in Merry Hill and Penn wards would be 6% and 9% above the city average initially (3% and 6% above the city average by 2006).

88 One further representation was received during Stage One. The Conservative Group on the Council fully supported the City Council's main proposal for these wards.

89 Having carefully considered both representations received during Stage One, we are content to adopt the City Council's proposals for these wards, subject to one minor boundary amendment. We note that the existing arrangements provide for acceptable levels of electoral equality, and that the Council's proposal to retain the majority of these wards in their existing forms received consensual support from the three political groups on the Council. We consider that the existing arrangements currently provide for effective and convenient local government while utilising readily identifiable boundaries, and we are content to adopt them as part of our draft recommendations. However, we intend to make a minor modification to the City Council's proposals for the boundary between Merry Hill and Penn wards. We note that the Council's proposals involve transferring a small number of electors in the area to the east of Warstones Road and South of Springhill Lane from Penn ward into Merry Hill ward, in order to improve electoral equality. We consider that retaining the entirety of the existing boundary of Warstones Road would provide for a more readily identifiable boundary in this area and we intend retaining this boundary. We therefore recommend retaining Blakenhall, Graiseley, Merry Hill and Penn wards in their existing forms as part of our draft recommendations.

90 Under our draft recommendations, the number of electors per councillor in Blakenhall, Graiseley, Merry Hill and Penn wards would be the same as under the existing arrangements. Our draft recommendations are set out in Tables 1 and 2, and illustrated on Map 2, in Appendix A and on the large maps.

Electoral cycle

91 Under section 7(3) of the Local Government Act 1972, all Metropolitan boroughs have a system of elections by thirds.

Conclusions

92 Having considered all the evidence and representations received during the initial stage of the review, we propose that:

- a council of 60 members should be retained;
- there should be 20 wards;
- the boundaries of 16 of the existing wards should be modified, and four wards should retain their existing boundaries.

93 As already indicated, we have based our draft recommendations on the City Council's main proposals, but propose to depart from them in the following areas:

- we propose transferring the All Saints area from St Peter's ward into Ettingshall ward, in order to better reflect communities and secure a stronger, more readily identifiable boundary;

- we propose modifying the boundary between Ettingshall and Bilston East wards, in order to improve access between areas of Bilston East ward and to unite Bilston town centre in Bilston East ward;
- we propose retaining the existing boundary of Warstones Road between Merry Hill and Penn wards, in order to secure a more readily identifiable boundary;
- we propose modifying the boundary between St Peter's and Oxley wards, in order to ensure that the electors to the south of Oxley Golf Course are represented in the same ward.

94 Table 5 shows how our draft recommendations will affect electoral equality, comparing them with the current arrangements (based on 2001 electorate figures) and with forecast electorates for the year 2006.

Table 5: Comparison of current and recommended electoral arrangements

	2001 electorate		2006 forecast electorate	
	Current arrangements	Draft recommendations	Current arrangements	Draft recommendations
Number of councillors	60	60	60	60
Number of wards	20	20	20	20
Average number of electors per councillor	3,055	3,055	3,048	3,048
Number of wards with a variance of more than 10% from the average	5	2	5	0
Number of wards with a variance of more than 20% from the average	0	0	1	0

95 As shown in Table 5, our draft recommendations for Wolverhampton City Council would result in a reduction in the number of wards with an electoral variance of more than 10% from five to two. By 2006 no ward is forecast to have an electoral variance of more than 8% from the city average.

Draft recommendation

Wolverhampton City Council should comprise 60 councillors serving 20 wards, as detailed and named in Tables 1 and 2, and illustrated on Map 2 and in Appendix A and the large maps.

Map 2: Draft recommendations for Wolverhampton

5 WHAT HAPPENS NEXT?

96 There will now be a consultation period, during which everyone is invited to comment on the draft recommendations on future electoral arrangements for Wolverhampton contained in this report. We will take fully into account all submissions received by 16 December 2002. Any received *after* this date may not be taken into account. All responses may be inspected at our offices and those of the City Council. A list of respondents will be available from us on request after the end of the consultation period.

97 Express your views by writing directly to us:

Team Leader
Wolverhampton Review
The Boundary Committee for England
Trevelyan House
Great Peter Street
London SW1P 2HW

98 In the light of representations received, we will review our draft recommendations to consider whether they should be altered. As indicated earlier, it is therefore important that all interested parties let us have their views and evidence, ***whether or not*** they agree with our draft recommendations. We will then submit our final recommendations to The Electoral Commission. After the publication of our final recommendations, all further correspondence should be sent to The Electoral Commission, which cannot make the Order giving effect to our recommendations until six weeks after it receives them.

APPENDIX A

Draft recommendations for Wolverhampton: Detailed mapping

The following maps illustrate our proposed ward boundaries for the Wolverhampton area.

Map A1 illustrates, in outline form, the proposed ward boundaries within the city and indicates the areas which are shown in more detail on the large maps.

The **large maps** illustrate the existing and proposed warding arrangements for Wolverhampton.

Map A1: Draft recommendations for Wolverhampton: Key map

APPENDIX B

Code of Practice on Written Consultation

The Cabinet Office's November 2000 *Code of Practice on Written Consultation*, www.cabinet-office.gov.uk/servicefirst/index/consultation.htm, requires all government departments and agencies to adhere to certain criteria, set out below, on the conduct of public consultations. Public bodies, such as The Boundary Committee for England, are encouraged to follow the Code.

The Code of Practice applies to consultation documents published after 1 January 2001, which should reproduce the criteria, give explanations of any departures, and confirm that the criteria have otherwise been followed.

Table B1: The Boundary Committee for England's compliance with Code criteria

Criteria	Compliance/departure
Timing of consultation should be built into the planning process for a policy (including legislation) or service from the start, so that it has the best prospect of improving the proposals concerned, and so that sufficient time is left for it at each stage.	We comply with this requirement.
It should be clear who is being consulted, about what questions, in what timescale and for what purpose.	We comply with this requirement.
A consultation document should be as simple and concise as possible. It should include a summary, in two pages at most, of the main questions it seeks views on. It should make it as easy as possible for readers to respond, make contact or complain.	We comply with this requirement.
Documents should be made widely available, with the fullest use of electronic means (though not to the exclusion of others), and effectively drawn to the attention of all interested groups and individuals.	We comply with this requirement.
Sufficient time should be allowed for considered responses from all groups with an interest. Twelve weeks should be the standard minimum period for a consultation.	We consult on draft recommendations for a minimum of eight weeks, but may extend the period if consultations take place over holiday periods.
Responses should be carefully and open-mindedly analysed, and the results made widely available, with an account of the views expressed, and reasons for decisions finally taken.	We comply with this requirement.
Departments should monitor and evaluate consultations, designating a consultation coordinator who will ensure the lessons are disseminated.	We comply with this requirement.