

Response to the LGBCE Further Draft Recommendations July 2022



10 August 2022

Introduction

1. This is my response to “New Electoral Arrangements for Brighton & Hove City Council – Further Draft Recommendations July 2022” (henceforth, the “further draft recommendations” or the “report”), published 5 July 2022 by the Local Government Boundary Commission for England (henceforth, the “LGBCE” or the “commissioners”).
2. Generally, I support the further draft recommendations for the five wards listed in the northern and central areas of Brighton and Hove City Council - being the boundaries shown in purple on the interactive maps made available online by the LGBCE and described as the “further draft recommendations” in the LGBCE’s report of 5 July 2022.
3. I recognise our local communities in the wards presented by these further draft recommendations for these five wards (ie, Hove Park, Hollingbury & Carden, Westdene & Patcham, Hollingdean & Fiveways and Preston Park), which I did not with the previous draft proposals.
4. My comments below note some specific disagreements with alternative proposals in direct response to points raised by the LGBCE report. At section D, I propose an amended boundary within polling district PHSD. At sections C and E, I propose a small reciprocal boundary adjustment.
5. My response is structured as follows:
 - A. Westdene and Patcham
 - B. Hollingbury and Carden
 - C. Hove Park
 - D. Hollingdean and Fiveways
 - E. Preston Park
 - F. Hanover and Elm Grove
6. For clarity I have used the ward names adopted by the commissioners. My comments indicate where I support these names. At section E, I state my view that a new name would be less confusing for all than recycling the name of a ward from which the new ward will be substantially different.

A. Westdene & Patcham ward

7. I support the boundaries outlined in the further draft recommendations (shown in purple on the consultation's interactive map). Specifically, I agree this ward should:
- be a two councillor ward entirely in Brighton
 - be named “Westdene & Patcham”
 - include Hazeldene Meads, The Beeches and Withdean Road
 - observe the Brighton / Hove town boundary
 - exclude any part of Hove Park ward. Westdene is a distinct area in a separate town: Brighton, not Hove.
8. I agree with the comments at report paragraph 12: Dyke Road is a barrier, impeding pedestrians crossing from Westdene into Hove; direct public transport links are absent between Westdene and Hove Park; and the previously proposed ward of “Westdene & Hove Park” would be too large for effective or convenient local government. I refer also to my comments at paragraph 15 herein.
9. Westdene and Patcham are neighbouring Brighton communities, with ready access to each other, including multiple, pedestrian-prioritised crossing points on the London Road, served by the same bus services (5, 5A, 17, 273, etc), with similar housing, merged Local Action Teams and established joint community newsletters across Withdean and Patcham.
10. This further draft recommendation for a Westdene & Patcham ward best reflects these communities' links and, in my opinion, should become the LGBCE's final recommendation for this ward.

B. Hollingbury & Carden ward

11. I support the boundaries outlined in the further draft proposals (shown in purple on the consultation's interactive maps). Specifically, I agree this ward should be a two councillor ward named “Hollingbury & Carden”.

12. Since people from outside Hollingbury or Carden regularly struggle to distinguish these neighbouring communities from each other, I think it unarguable that this proposed ward has a strong local identity and many links, being served by the same bus services (eg, 5B, 26, 46) and local facilities including Hollingbury Library, Carden School, County Oak Medical Centre and Carden Park. Hollingbury and Carden have more established links with each other than either has with Patcham or another area.
13. This further draft recommendation for a Hollingbury & Carden ward best reflects these communities' links and, in my opinion, should become the LGBCE's final recommendation for this ward.

C. Hove Park ward

14. Generally, I support the boundaries outlined in the further draft recommendations (shown in purple on the consultation's interactive maps), except where the east boundary deviates south west away from Dyke Road. Specifically, I agree this ward should be a two councillor ward entirely in Hove, observing the Brighton / Hove town boundary. However, I note a conflict between report paragraphs 15 and 27, discussed below.
15. I dispute the suggestion that Hove residents' use of Hove Park evidences "clear shared use of facilities", or establishes a community with Brightonians living in Westdene (report paragraph 8). People travel across Sussex to use sports facilities at Withdean Stadium (in Westdene) and to walk on the South Downs (in Westdene and Patcham). No more of a local community is created with those visitors from outside Brighton or Hove than is suggested with Hove residents using Hove Park. The LGBCE is right to reinstate the town boundary as the ward boundary. Brighton and Hove are separate towns with distinct cultures – and Hove Park ward is an identifiable area of Hove; not Brighton.
16. Accordingly, I disagree that Hove Park ward's established boundaries be altered to move Hove's Dyke Road Park (and environs) into Brighton's Preston Park ward (report paragraphs 24, 27). Since the further draft recommendations reinstate Hove Park as a separate two councillor ward,

I propose that its Dyke Road boundary extend south east to the junction with Old Shoreham Road, to observe fully the Brighton / Hove town boundary and place Dyke Road Park and its Hove environs wholly within the Hove ward of Hove Park.

17. With this one extension of its Dyke Road boundary south east to the junction with Old Shoreham Road, I believe the further draft recommendation for Hove Park should become the LGBCE's final recommendation for this ward.

D. Hollingdean & Fiveways ward

18. Generally, I support the boundaries outlined in the further draft recommendations (shown in purple on the consultation's interactive maps), excepting the treatment of Saunders Park estate where I suggest a boundary adjustment, described below at paragraphs 25-26 herein.
19. Specifically, I agree this ward should be a three councillor ward named "Hollingdean & Fiveways". I endorse both retaining the 'Friars' estate and uniting the recycling centre within this ward, plus moving the streets from Balfour Road (west) to Surrenden Road into Preston Park ward. The Commissioners have better reflected community identities by moving the ward boundary to unite the Varndean community in Preston Park ward.
20. I am greatly concerned that the Hollingdean & Fiveways ward has not been extended to Lewes Road (report paragraphs 23, 26). I believe that Hollingdean Road from east of the railway line to the Lewes Road should form part of the boundary of Hollingdean & Fiveways and Roundhill wards. (Making the "gyratory" junction of Hollingdean, Lewes and Bear roads a boundary also with Moulsecoomb & Bevendean and Hanover & Elm Grove wards.) I believe the residential areas known as the 'Saunders Park estate' (specifically, I refer to: Freehold Terrace, Popes Folly and Saunders Park View up to number 125, including Saunders Park Rise and various small lodges, plus Hollingdean Road from east of the railway line to the Lewes Road), should be kept within Hollingdean & Fiveways ward.

21. These streets of the Saunders Park estate (as listed above at my paragraph 20), orientate towards Hollingdean. Prior to the development of the Preston Barracks site, access out of this neighbourhood was via Popes Folly onto Hollingdean Road. From there, residents can easily walk to shops, buses and other amenities nearby in Hollingdean. By contrast, reaching Moulsecoomb requires navigating the dangerous and congested gyratory traffic junction, somehow crossing Lewes Road, or going across either the large, busy retail park, or construction sites under development, or the University of Brighton campus. Whether heading north or east, the new university accommodation and other developments present large, physical obstacles to the Saunders Park community developing a shared identity with Moulsecoomb.
22. Historically, **the PHSD polling district** comprising Saunders Park numbered only a few hundred voters (435 – 2019; 537 – 2021). The Commissioners' concern is that enlarging Hollingdean & Fiveways ward to include Saunders Park estate will exceed permissible variance limits for voter numbers (report paragraph 26). However, I believe existing Saunders Park community links can be respected if the final recommended boundary splits the existing PHSD polling district between the Hollingdean & Fiveways and Moulsecoomb & Bevendean wards.
23. The PHSD voter projection (1,802 – 2027) allows for expanded University of Brighton accommodation and other developments located north of the Pavilion Retail Park, west of the Lewes Road and beyond the established residential properties (ie, those properties up to number 125 on the west side of Saunders Park View). Large scale, modern university accommodation stands north of and starkly distinct from Saunders Park housing, which mirrors traditional housing found in Hollingdean. The new developments are building links with the university and streets to the north. Residents in all developments north of the retail park, particularly university accommodation, will find it equally easy to vote at Moulsecoomb Hall (PHSC), if not easier than voting at the United Reformed Church (PHSD). Arguably, these electors should be part of the PHSC polling district and not allocated to the PHSD polling district as it appears they have been in the projection.

24. Accordingly, I request that the Commissioners recalculate the elector variance after moving the new developments, university accommodation and all streets to the north of the university into Moulsecoomb & Bevendean ward, while retaining the Saunders Park estate (ie, the streets I list at paragraph 20 herein) within Hollingdean & Fiveways ward. I believe that a tolerable variance can be achieved and community cohesion preserved for all concerned by amending the boundary as I suggest next.
25. My **proposed alternative boundary** would run east along the south side of Hollingdean Road from the railway to the Lewes Road, turn north up Lewes Road up to The Furlong. (This turning is not shown on the LGBCE's consultation map but is immediately north of the Pavilion Retail Park; named for and part of the development of the former Preston Barracks.) My suggested boundary adjustment would run west to the immediate south of The Furlong (so that turning and all the development to its north would be within Moulsecoomb & Bevendean ward) and continue straight ahead to run due west along the north side of the B&Q retail unit. From there, I propose this boundary adjustment loop north along the centre of Saunders Park View as far as the northern boundary of the final residential property on the west side of this street (previously 123, but shown on the consultation map as number 125), where it would turn west to the railway line to re-join the proposed boundary as per the further draft recommendations.
26. The effect would be to move electors residing in Hollingdean Road from the railway line east to the Lewes Road, Freehold Terrace, Popes Folly and Saunders Park View up to number 125, including Saunders Park Rise and various small lodges, into Hollingdean & Fiveways ward. Thus, the longstanding Saunders Park estate could maintain its traditional community links with Hollingdean. Whereas, the expanding, often younger and university-linked population, in the north of the current PHSD polling district with easier and closer links to Moulsecoomb, would sit within the Commissioners' proposed Moulsecoomb & Bevendean ward. I advocate this as a solution to satisfy both commissioners and community.
27. I note that the Commissioners have been willing to tolerate variances marginally above the statutory limits in order to preserve community cohesion in Eastern Brighton & Hove (report paragraph 41). If necessary,

I ask the Commissioners to apply the same latitude to retain Saunders Park estate within Hollingdean & Fiveways. I have been unable to break down the projected elector numbers on a street-by-street basis; hence my request that the Commissioners recalculate the elector variance using my suggested amended boundary. If the resulting variance is within the legal parameters, I urge the Commissioners to adopt this revision in their final recommendations in order to recognise community links by retaining the identified area of the Saunders Park estate within Hollingdean & Fiveways ward.

28. With this one amendment to include the Saunders Park estate in Hollingdean & Fiveways, as I suggest, I believe the further draft recommendation for Hollingdean & Fiveways should become the LGBCE's final recommendation for this ward.

E. Preston Park ward

29. Generally, I support the boundaries outlined in the further draft recommendations (shown in purple on the consultation's interactive maps), except where the west boundary deviates south west away from Dyke Road. Specifically, I agree this ward should:

- be a three councillor ward entirely in Brighton
- be named "Preston, Stanford & Varndean"
- include the streets from Balfour Road (west) to Surrenden Road
- exclude Hazeldene Meads, The Beeches and Withdean Road
- observe the Brighton / Hove town boundary.

30. I agree that the network of streets west of Balfour Road to Surrenden Road, 'form part of the community around Preston Park, not Fiveways' (report paragraph 23). The Commissioners have better reflected community identities by moving the ward boundary to include these streets and unite the Varndean community within Preston Park ward. However, I think continuing to use the name of a previous, substantially different ward, will cause confusion across many ward-based

organisations as well as for electors. I believe the alternative suggested name of "Preston, Stanford & Varndean" ward will better distinguish this new ward to all.

31. I strongly disagree with including Dyke Road Park in this Brighton ward. I have seen no evidence to support the assertion (report paragraph 24) that this park is "most heavily used" by Prestonville residents and I doubt that view has a properly researched basis in fact. The consequent boundary revision (report paragraph 27) is based on two submissions only relating to the park (report paragraph 24). Yet this also changes responsibility for land adjacent to the park, including one of the two major sixth form colleges in Brighton and Hove (Brighton, Hove and Sussex Sixth Form College, or "BHASVIC"), without any local support for such a move in any consultation response I read.
32. Dyke Road Park lies wholly within Hove. Drawing the ward boundary to include it within a Brighton ward transgresses the Brighton / Hove town boundary. Both in general comments and in relation to particular wards, 77 respondents to the previous consultation expressed the view that the Brighton / Hove town boundary should be observed by the LGBCE and not "straddled", nor "blurred", nor crossed by ward boundaries. By my reading, only a maximum of 24 responses offered any degree of support to ignoring the boundary. It strikes me as fairly conclusive when local electors, who have stated a view, collectively want the Brighton / Hove town boundary to be observed by more than 3 to 1.
33. Accordingly, I believe the western boundary of Preston Park ward should run down the centre of Dyke Road and not be diverted along part of Old Shoreham Road and the border of Dyke Road Park. Maintaining the ward's western boundary on Dyke Road will observe fully the Brighton / Hove town boundary by placing Hove's Dyke Road Park and its Hove environs, including BHASVIC, wholly within the Hove ward of Hove Park.
34. With this one extension of its western boundary along the centre of Dyke Road, I believe the further draft recommendation for Preston Park should become the LGBCE's final recommendation for this ward.

F. Hanover & Elm Grove ward

35. I support the further draft recommendations reverting to the existing boundaries for this well-defined ward.

36. My thanks to the Commissioners and all staff at the LGBCE for the work involved in developing the much improved further draft recommendations for the wards discussed herein.