

LGBCE Electoral Review of Brighton & Hove City Council 2021/22: Comments on draft recommendations (published 1 February 2022)

Submitted to the Local Government Boundary Commission for England by Brighton and Hove Green Party on 11 April 2022.

Brighton and Hove Green Party would like to thank the Commission for its work in formulating its draft proposals for the electoral review. We wish to make comments on the Commission's proposals as set out below.

We hope these comments are helpful to the Commission in deciding its final recommendations.

Portslade

North Portslade and South Portslade

We welcome the Commission's recommendation to retain the boundaries of North Portslade & South Portslade, respecting that Portslade has a distinct community identity and was historically a separate urban district.

Hove

Aside from the nature and naming of the Regency and Westdene & Hove Park wards, we broadly welcome the Commission's proposals in Hove including the retention of most existing ward names. As expressed in our original submission, we believe that the boundaries between Brighton, Hove, and Portslade should be respected.

Given our discussions with local residents and community associations, we strongly disagree with the two proposals for wards including areas either side of the Hove/Brighton boundary. We feel breaking this boundary is unnecessary. Hove, as a whole, has good electoral equality of ~0.5% variance currently, rising to no more than 2% by 2027.

We believe the proposals for the Regency ward and the Westdene & Hove Park ward come from inaccurate information presented by the Conservative group and do not meet the Commission's considerations. Hove has a distinct and separate identity to Brighton. We would strongly argue for the retention of existing boundaries between wards in these two cases, something which is possible, and which would better meet the Commission's considerations. We set out our position with regards to these two areas in more detail below.

We understand that parliamentary boundaries are not a relevant consideration for the Commission. However, our councillors and our member of parliament have noted how the alignment of the Hove & Portslade parliamentary constituency with ward boundaries has strengthened the resolution of residents' casework on both sides of the boundary. We also note that the initial Boundary Commission for England proposals, presented as part of their current review of parliamentary constituencies, retain the existing Hove constituency unchanged.

Hove seafront

Wish and Westbourne

With regards to the exchange of roads between the existing Wish and Westbourne wards, we thank the Commission for adopting our proposal to unite the community of Poets Corner in a single ward (Westbourne). We accept the logic of the alteration to include the new development on School Road within Wish rather than Westbourne.

Central Hove and Goldsmid

We are also supportive of the Commission's proposals to make only small realignments to the boundaries of the Central Hove and Goldsmid wards.

Regency / Brunswick & Adelaide

The proposed three-member ward of Regency is not a proposal which we can support. We do not feel that it meets any of the Commission's considerations, namely that it has worse electoral equality than the current situation, does not reflect community identity, and does not support effective and convenient local government.

We also note the very thorough and evidenced combined response presented to the Commission by the Friends of Brunswick Square & Terrace, the Lansdowne Area Residents Association and the Friends of Palmeira & Adelaide which sets out why Brunswick & Adelaide should be kept as a distinct ward:

<http://friendsofbrunswick.co.uk/wp-content/uploads/2022/04/LGBC-response.pdf> .

On the matter of electoral equality, the proposed ward would have a current variance of 8% and a forecast variance of 5% which is greater than the current Brunswick & Adelaide (1% and -4% respectively) and the current Regency (0% and 1%). The current Brunswick & Adelaide ward but with the addition of Kingsway Court (proposed by the Green and Labour submissions and adopted by the Commission) would have a variance of 2% currently and -3%, significantly closer than the Regency proposal.

The Brunswick Estate was first built in the early 1800s. At the time it was a separate town, close to Brighton, which was designed by the architect Charles Busby. Many of the roads in this area have Brunswick in their name as a result - Brunswick Place, Brunswick Square, Brunswick Terrace, Brunswick Street East, Brunswick Road, Brunswick Street West and Brunswick Mews. Other roads mark their place in the town - Donkey Mews is where the donkeys were kept, and Lower and Upper Market Street was where the market was. The Bow Street runner pub is the site of the old town hall and office of the commissioners (police), and the Old Market music venue is the former location of the indoor market.

The Commission, in identifying the architecture of Brunswick and Regency as similar, has not recognised this unique history. It is this unique history which means the neighbourhood remains a very separate area to Regency nearby. Many residents still identify as being a separate community of Brunswick, or at the very least, as part of Hove. The area is still represented by the Brunswick Town Association and Brighton & Hove City Council is currently consulting on an updated Character

Area statement, reflecting the uniqueness of it as a conservation area. Part of the ward also remains under an act of Parliament (Hove Act 1976) determining the colour it is painted on a five-year cycle.

Likewise, Regency is very much a Brighton community, or rather a grouping of communities, that all identify closely with the heart of Brighton and are very distinct from next door Brunswick.

The current Regency ward is made up of three main areas: Clifton & Montpelier in the north, the Squares in the south (Norfolk Square, Bedford Square, Regency Square, Clarence Square, Russell Square and Churchill Square), and the Old Town in the south-east. While different communities, they all have one thing in common: they all feel part of the centre of Brighton and very distinct from Brunswick (and Hove in general).

The four current councillors covering the Brunswick & Adelaide and Regency wards, as they are currently formed, do not feel that their casework is similar and in particular does not have the overlap around the homeless population as suggested by the Conservative Group. It is worth noting that the Conservatives have not represented any of these areas since the formation of Brighton & Hove City Council in 1996 and so would not have an informed view of the nature of casework in these areas. The different areas have their own distinct issues and challenges, as noted in particular by the residents groups' response, and so it does not "support effective and convenient local government" to combine them.

We therefore propose that the current two-seat ward of Brunswick & Adelaide ward is maintained but with the addition of Kingsway Court (as proposed by the Commission), providing a ward which meets all of the Commission's considerations. The additional electors and seat, coming from the current Regency ward, then form part of our response to the Central Brighton proposals.

If the Commission were still minded to keep the current proposal, despite the opposition from communities within the existing Brunswick & Adelaide ward, we would ask for the ward name to be changed to "Brunswick & Regency" to note the prominence of Brunswick Town which appears to have been neglected by the Conservative Group and in these draft recommendations.

North Hove

Westdene & Hove Park and Hangleton & Knoll

The proposed three-seat ward of Westdene & Hove Park is not one which we feel appropriately meets the Commission's considerations. The proposal does improve electoral equality compared to the existing Hove Park ward which is forecast to be the third highest variance of the existing wards, however there are other ways to improve electoral equality without the negative consequences of this change.

In particular the Commission has not made any proposed changes to the boundary between Hove Park and Hangleton & Knoll despite three-seat Hangleton & Knoll having a significantly negative variance forecast (over -9%) while two-seat Hove Park has a significant positive variance forecast (+16%). The area covering the existing Hove Park and Hangleton & Knoll wards taken together has a current variance of only 1.6% and a forecast variance of less than 0.9%. It is primarily the development of the Sackville Trading Estate/Coal Yard site on Sackville Road which increases the forecast variance for the Hove Park ward as it is expected to add 564 homes to the ward.

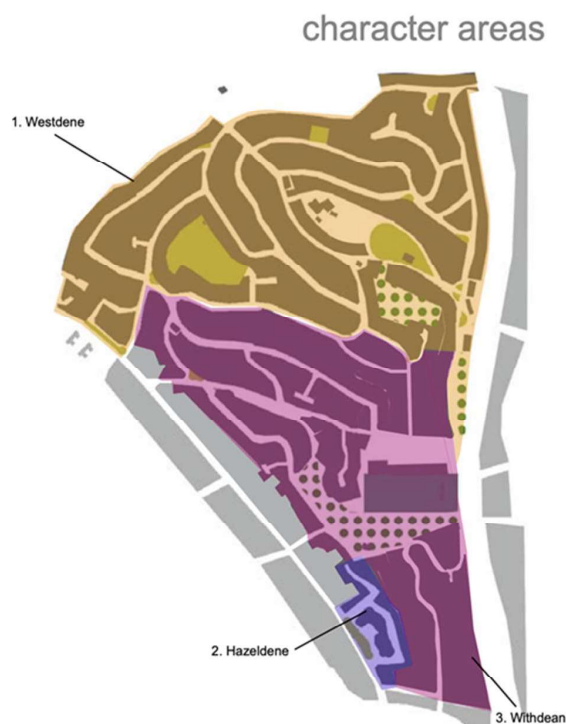
Whilst there is a clear rationale for the Hangleton & Knoll boundaries in the west (Portslade boundary), south (railway line) and north (city boundary) there is not one for the eastern boundary

with Hove Park ward. There is therefore a strong case that to meet the consideration of electoral equality, a better solution would be to move the boundary between these two wards, especially given the additional large development in Hove Park outlined above.

We are concerned that the proposal for Westdene & Hove Park ward put forward by the Conservative Group and adopted by the Commission presents a risk to the political impartiality of the Commission due to the expected change it would cause to the political makeup of the council. Westdene is currently part of Withdean ward which after an almost unbroken run of electing Conservative councillors elected three Green Councillors in 2019 (otherwise only one non-Conservative during the era of Brighton & Hove City Council and none in the predecessor wards in Brighton Borough council elections from 1973 to 1995). Hove Park on the other hand is still considered to be a “safe” Conservative ward. Therefore, the likely impact of this proposal, put forward by the Conservative Group, would be to elect one additional Conservative councillor.

The evidence presented by the Conservative Group to justify this proposal is in many places inaccurate and misleading. The current boundary of Dyke Road/Avenue is described as “illogical” and “arbitrary” when it is neither. As described earlier, Hove and Brighton have distinct identities to each other, and Dyke Road/Avenue forms a sensible and coherent boundary between Seven Dials and the top of the city. Dyke Road/Avenue is one of the major routes out of the city, leading to the A27 at the north. It forms a physical divide between the two very individual communities of Hove Park and Westdene. Contrary to the Conservative Group’s initial submission, the style and size of housing within the two areas is significantly different within the Tongdean and Westdene areas divided not united by Dyke Road/Avenue.

Further to this, the boundary line that has been identified by the Conservative Group is not the boundary of Westdene as described by the Urban Characterisation Study cited by the Conservative Group. The map of character areas shows Westdene being purely the uppermost section bounded by Valley Drive into Redhill Drive and Hillbrow Road. The proposed boundary therefore splits the Withdean community into two wards and actively acts against the Commission’s considerations. The point at which Withdean is split appears arbitrary with properties of very similar character ending up on opposite sides of the boundary.



While it is true that Hove Park is near to Westdene and the wider Withdean it is cut off by Dyke Road. Withdean at present is broadly defined as the area between the Dyke Road and London Road transport corridor including Surrenden Field, Withdean Park and Waterhall. Public transport links for Withdean residents link them into the city centre in Brighton, rather than into Hove. Residents in the current Withdean ward, and notably Westdene, identify as being residents of Brighton.

The Commission's initial proposals note that residents may share leisure facilities between Hove and Westdene. The same can be said for many parts of the city because of the leisure facilities the city has and where they are located. This does not seem a concrete enough reason to link these two very distinct communities together. Nor does it seem particularly correct in this case as there are similar facilities in the Hove Park area such as Hove Fitness and Squash.

The further point made about shared use of supermarket facilities, while potentially true, does not feel like a good enough justification to connect Westdene to Hove Park. The nature of the geography of Brighton & Hove means a number of wards such as Goldsmid, Hanover & Elm Grove, and indeed Withdean in general have no large supermarkets within them and so residents will naturally end up shopping in adjacent or even non-adjacent wards (if they primarily use large supermarkets). To arrange the warding pattern within the city generally based on large supermarkets would lead to a small number of very large wards.

The Conservative Group have also inaccurately claimed that the Three-Cornered Copse extends "all the way along the northern boundary of Westdene" whereas it really ends at Dyke Road Avenue where the current ward boundary lies. The Friends of the Three Cornered Copse have previously mapped out its boundaries: <http://www.threecorneredcopse.org.uk/location.htm> .

We therefore propose that the merging of Westdene with Hove Park is re-considered and the boundary of Dyke Road/Avenue is retained. The additional electors (3411 currently, 3492 forecast) and seat, coming from Westdene, then form part of our response to the north Brighton proposals.

As we have outlined, the Hove Park ward can be made to work within electoral equality by moving the boundary with Hangleton & Knoll due to the electorate figures across the full area of the two wards. Our proposal would therefore be to move the boundary between the two wards so that it runs down Nevill Road encompassing the school sites, allotments and residential roads between Old Shoreham Road and the train track west of Nevill Road. Nevill Road is also known as the A2023 and is a major transport route which makes a much better boundary between the wards than the current boundary. This would also more properly encompass the West Blatchington area within Hangleton & Knoll ward as the area, which started as a small village distinct from the rest of Hove, is currently split across the two wards with the historic West Blatchington Mill and St Peter's Church lying almost on the boundary.

The three-seat Hangleton & Knoll ward and two-seat Hove Park ward with the boundary modified as described above lead to improved electoral equality compared to the current proposals.

North Brighton

As described in the section relating to the proposed Westdene & Hove Park ward, we do not feel that this meets the Commission's considerations and that Westdene currently operates much better with the rest of the Withdean ward. There are some merits to the proposed Preston Park and Fiveways wards. However we believe there are also some problems with the proposals.

With the inclusion of Westdene back into this area of wards, we are proposing a different warding pattern which we feel better reflects the Commission's considerations, especially those of reflecting community identity and the effectiveness of local government. We believe the six seats which make up the proposed Fiveways and Preston Park wards alongside the one seat which goes with Westdene should be configured as a three-seat Withdean ward closely resembling the current ward, a two-seat Hollingdean & Fiveways ward made of a subset of the areas in the proposed Fiveways ward, and a two-seat Preston Park ward made up of a subset of areas in the existing Preston Park ward, of which there is also a reasonable level of overlap with the proposed Preston Park ward. More detail and reasoning are provided below for each. This area split across seven seats allows for good electoral equality and with a small change allows Patcham & Hollingbury to also have good electoral equality.

We are also proposing a slightly modified boundary between Patcham & Hollingbury and Withdean (Preston Park in the Commission's proposals) which sits in between the current and proposed boundaries to better meet the need for community links while maintaining good electoral equality.

All of these proposed wards are possible with good electoral equality and in many cases have improved electoral equality compared to the Commission's proposals.

If the Commission were still minded to keep the current proposals, we would ask for the ward names to be changed to "Hollingdean & Fiveways" and "Preston Park & Withdean" or "Preston Park & Surrenden" to recognise the distinct areas which have been combined, especially given how different the proposed Preston Park ward is to the current version. We do however support the change of name of Patcham to "Patcham & Hollingbury", recognising that the ward contains those two communities which have grown into each other.

Withdean and Patcham & Hollingbury

As partially outlined in relation to the Westdene & Hove Park proposal, the current ward of Withdean is felt to be both sensibly bounded and well-functioning in terms of the nature of casework and issues arising. We have described how much of the information provided that justified the current Withdean ward being discontinued is inaccurate or of little relevance so we would argue there is little reason not to continue with the majority of the current ward boundary as it meets all of the Commission's considerations being within the requirements for electoral equality, keeping community boundaries intact, and promoting effective local government by way of casework.

We understand however that Patcham & Hollingbury needs a small number of electors moved into it to achieve good electoral equality so would suggest a boundary in between the current and proposed boundary between Patcham & Hollingbury and Withdean (Preston Park in the Commission's proposals). The proposals to move the boundary from Peacock Lane down to Surrenden Crescent produces some odd abnormalities for properties on Surrenden Crescent as there are some facing both ways in the strip of land on the north side. Additionally, some parts of the current Withdean ward from Cedars Hardens, such as Withdean Court Avenue, are proposed for inclusion in Patcham & Hollingbury despite their community links being with other parts of the current Withdean ward.

We therefore propose that the boundary should stay running along Peacock Lane but then run east-west along Tongdean Lane, in between the current and proposed boundary. This boundary would allow Withdean to keep a coherent identity while also allowing both wards to have good electoral equality.

Fiveways / Stanmer / Hollingdean

The separation of much of the existing Hollingdean & Stanmer ward into separate wards including Stanmer is something we welcome as the current ward is not very coherent, as noted in our original submission, with too many geographically disparate areas, which have very different issues. We however do not feel that the proposed Fiveways ward provides the right representation, especially for those within the Hollingdean area. The submission from the Conservative Group, which has been adopted to make this proposed ward, is not accurate in describing all of this area as a single community. Nor does the topography of this area support a single ward spanning almost from the park of Preston Park to the far end of Hollingdean.

Although the move to a ward which crosses over Fiveways is quite a big change, Fiveways is a destination that many people regularly use to shop and go out in and so it does have an identifiable community around it. As a result, it is an improvement for residents of Hollingdean. However, the Fiveways area is of more significance for those to the east and north-west rather than those to the south-west who lie down the hill towards the park of Preston Park itself. The shops and hospitality are almost all found to the north of the Fiveways junction, on both sides of Ditchling Road and most of the housing is of a similar type within those parts. The casework which arises from both the retail and residential parts of this area are very similar but distinct to those which come up from the part of the proposed Fiveways ward between the park of Preston Park and Fiveways junction. Hollingdean itself contains a significant ecosystem of residents groups with different aims and demographics to the section towards the park of Preston Park and so there are some concerns that the upper end of Hollingdean might not get the attention it deserves within the proposed larger three-seat ward of Fiveways.

We are therefore proposing that the Fiveways ward should be reduced to a two-seat ward to better represent the needs of those communities and that the name of the ward should instead be Hollingdean & Fiveways. The boundaries with Moulsecoomb & Bevendean, Stanmer, and the north part of the boundary should remain as currently proposed but the boundaries to the west should change to continue down Ditchling Road past the junction of Ditchling Road with Surrenden Road then run down Balfour Road (as the current Preston Park boundary does), back along Preston Drove and down the Ditchling Road from Fiveways. Both Preston Drove and Ditchling Road south of Fiveways are busy roads which make natural boundaries. This ward would therefore consist of the current polling districts of PHSE, PHSF and PHSG from Hollingdean & Stanmer and PPPE from Preston Park.

Preston Park

Alongside the concerns raised about the proposed Fiveways ward, we do not feel that the proposed Preston Park ward is a coherent one as it compromises areas primarily from the Withdean area of neighbourhoods rather than being centred on the park of Preston Park.

We feel it is particularly important, based on feedback from councillors representing the current Preston Park ward, that the parks of Preston Park and Blakers Park should be contained within the same ward, which the current proposal does not do. Though of quite different sizes, the two parks experience very similar problems caused largely by the same groups of people. The current councillors, the Local Action Team (LAT), PCSOs and the respective “Friends of” groups have worked together effectively to tackle these issues which would be undermined by separating them and not support the Commission’s consideration of effective local government.

Our proposed ward contains two core communities, Prestonville and the area to the east of the park bounded by Preston Drove and Stanford Avenue plus Grantham Road (often colloquially known as “the golden triangle”). These two areas are similar in demographic and composition being almost entirely residential with neighbourhood pubs and a small number of additional local amenities and businesses. Both residential areas generate a similar type of casework despite being to the south-west and east of the park itself respectively.

This would be a two-seat ward consisting only of areas within the current Preston Park ward, namely polling districts PPPA, PPPB, PPPD, and the section of PPC north of Grantham Road (the area south already forming part of the Commission’s proposals for Round Hill ward).

Stanmer and Moulsecoomb & Bevendean

We thank the Commission for adopting our proposals for a two-seat Stanmer ward and a three-seat Moulsecoomb & Bevendean.

We acknowledged in our original submission, the difficulties in this sector of the city of balancing the competing needs for electoral equality and representing communities of very different sizes, but we think this warding pattern is an improvement on the current arrangements.

After discussing the Commission’s proposals with the community, we would like to make one suggestion for a change to the name of the ward but no suggested changes to the ward boundaries. Our suggested name of the ward is now “Coldean & Stanmer” reflecting the significance and

uniqueness of Coldean within the ward, and that as a community it often feels overlooked, it would be right to recognise it in the ward name.

Central Brighton

Round Hill

We are supportive of the creation of a Round Hill ward with two councillors. However, we feel that a small adjustment to the boundary would be beneficial in the commercial London Road area.

We note that the projected numbers for the new proposed Round Hill ward are 7% above quota, and so we suggest that this change can be accommodated while improving electoral equality.

The area around London Road which runs from Preston Circus (where the fire station is located) south to St Peter's Church is predominantly commercial with student housing blocks and some residential streets of terraced housing. We have heard from members of the London Road Local Action Team (LAT) that they feel the area would not be well served by the two sides of London Road shopping district being split between different wards as it tends to be the same issues affecting both sides. A single set of councillors dealing with all casework relevant to the London Road shopping district would allow them to more properly address both individual problems and longer-term persistent issues. Keeping both sides in the same ward would therefore support the Commission's consideration of effective local government.

The Level open green space is used by residents from all surrounding areas in different wards - but we suggest it is better located with the North Laine and London Road areas and so would propose that the area is located within the same ward as North Laine.

We therefore propose that the boundary between St Peter's & North Laine and Round Hill should run from Preston Circus (where the fire station is located) to the rear of properties on the east side of London Road and then to the rear of properties on the north side of Baker Street, and then along Union Road. Therefore, the residential streets of Rose Hill Terrace, Kingsbury Road and Kingsbury Street would be in Round Hill ward, but the predominantly commercial areas of London Road, including the Open Market and Baker Street would be retained in St Peter's & North Laine.

We estimate this proposal would reduce the number of electors in the Commission's proposed Round Hill ward by around 235 electors. This would slightly improve its electoral equality, while improving the community coherence of the new ward.

Regency and West Hill & North Laine

As set out above, we object to the creation of a new Regency ward from the Brunswick & Adelaide ward in Hove and parts of the existing Regency ward in Brighton. And we propose that the existing boundary between Regency and Brunswick & Adelaide wards and also the historic boundary between the towns of Brighton and Hove is retained.

The electors for the existing wards of Regency and St Peter's & North Laine excluding the electors who would be in our proposed realigned Round Hill ward warrant representation by four councillors.

We propose that this area of the city should be divided into two two-seat wards covering Regency ward as it is currently configured and the remainder of the current St Peter's & North Laine, i.e. without the area covered by the new Round Hill ward except for the commercial area around London Road and the Level green open space (as set out in the section above). This would involve keeping the existing boundary which runs down Dyke Road from Seven Dials and then running along North Street where Dyke Road ends close to the clocktower.

The current Regency ward combines three distinct areas within it as described in our response to the proposed Regency ward which ran across the Brighton and Hove boundary. These all have a shared identity of being part of Brighton city centre and as such sit comfortably together in a ward. As noted in our original submission, the existing boundary along North Street is a main thoroughfare in the city centre and creates a sensible boundary between the Lanes area and North Laine. The Lanes contain very narrow streets and older, more commercial buildings whereas North Laine has a distinctive mix of residential, shopping and light industrial properties.

This mix characterises much of the proposed second city centre ward which would therefore consist of the communities of West Hill, North Laine, New England area, and those around the London Road shopping district due to the changes we have suggested above to the boundary with the proposed Round Hill ward.

This proposal achieves better electoral equality than the current proposals as the currently configured Regency ward has a forecast variance of just over 1% and the other city centre ward, we are proposing would have a variance of approximately 4% which is smaller than the -7% of the proposed Seven Dials, St Peter's & North Laine ward which much of this area would fall into.

The current Regency ward, if kept as currently configured, should still be named "Regency". However, the other two-seat ward in the city centre created from the current St Peter's & North Laine ward minus the parts needed for Round Hill would be better renamed to "West Hill & North Laine" noting those as the two most major identifiable neighbourhoods in the ward.

If the Commission were still minded to keep the proposed Seven Dials, St. Peter's & North Laine ward we would suggest renaming it to Seven Dials & North Laine. The current proposed name is longer than it need be, being the only ward name including three different areas, and actually St. Peter's does not particularly signify any area in the ward. While it is a significant landmark, St Peter's Church sits on the edge of the current and proposed ward boundary.

Eastern Brighton

Turning to the Commission's proposals in the wider East Brighton area of the city, we are pleased that the Commission has been convinced of the various proposals to better reflect the Kemptown community in the city's warding pattern. However, we are also of the view that several of the Commission's proposals break important existing community links in some proposed wards, and we note the considerable spread in the forecast variances for the four proposed wards which range from -7% to +10%. Indeed, we note that the proposed Queen's Park is actually outside of the Commission's target with a variance of +10.48%, while the adjacent Kemptown & Marina ward has a negative variance of -7%.

We believe that a better warding pattern can be achieved, improving community links, electoral equality and effective local government.

Hanover & Elm Grove

We object to the proposed changes to Hanover & Elm Grove ward.

The existing ward has good electoral equality and is generally a coherent collection of neighbourhoods. The ward contains the entirety of the Pankhurst Estate, most of Hanover (except for a few streets to the south), and the Elm Grove/Hartington Road area which is clearly bordered by Elm Grove to the south and the Bear Road to the north.

We do not agree with the Commission's proposal to move the Phoenix estates from Hanover & Elm Grove ward into Queen's Park ward.

The Phoenix estate is a small self-contained neighbourhood which has strong community links with the neighbouring Hanover community. There are clear walking and cycling routes into Albion Hill, a road which forms the existing southern boundary to the ward. Previous and current Hanover & Elm Grove ward councillors have worked with residents to set up a partnership based on a neighbourhood action plan, set up a community association, and survey the issues in the neighbourhood. Current councillors attend the meetings and are members of the Phoenix food shop and helped fundraise nearly £10,000 for this vital food project for low-income households. This project, started during the pandemic lockdown, is evolving as a sustainable community resource. Councillors have also been active in supporting the campaign to save the Free Butt (former pub) and develop it for community use. Councillors hold advice surgeries on the estate. Overall there is long-standing engagement between the estate's residents, community representatives, councillors and other ward-wide bodies such as the Hanover and Elm Grove Communities Forum. Given this integration and engagement, it does not make any sense to break these links.

Conversely, we do not see any justification at all to move the roads between Down Terrace and St. Luke's Terrace into Hanover, splitting some of the roads in this residential area between wards. Residents in the area that the Commission proposes to move are neither part of the Hanover community west of Queen's Park Road nor the Pankhurst Estate north of Down Terrace. Their existing community links are firmly with the rest of Queen's Park, with St. Luke's Primary School being a shared local amenity and a major focus of the community. Residents currently attend the Queen's Park Local Action Team and Forum. It does not make sense to break these links.

Down Terrace has very distinctively different residential characteristics on opposite sides of the road, and so this road is in our view a much better boundary between the two wards.

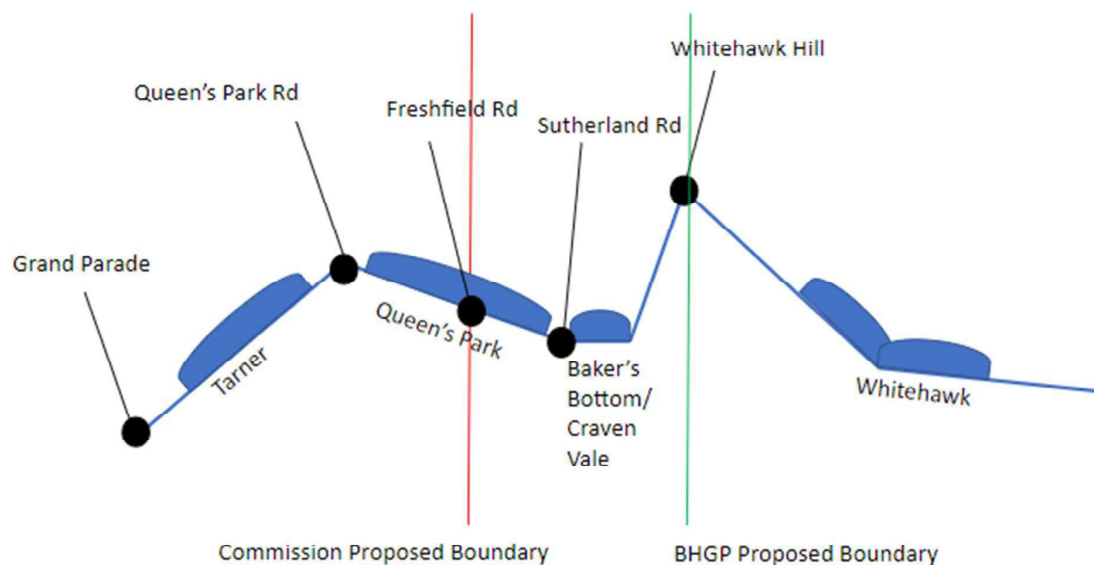
The existing Hanover & Elm Grove ward has good electoral equality – forecast at 5% variance in 2027. We therefore reiterate the view we expressed in our previous submission to the Commission, that, in the interests of all the Commission's criteria, the existing boundaries of Hanover & Elm Grove should remain unchanged.

Queen's Park

The current proposals from the Commission cut through the Queen's Park community.

We feel that the topography of the city in this area is an important consideration which the Commission may not have fully appreciated. Whitehawk Hill is a steep, high hill, which causes communities on either side of the hill to look in opposite directions in terms of their community connections. At the foot of Whitehawk Hill, the large Royal Sussex Hospital campus reinforces this boundary between the Queen's Park, Baker's Bottom and Craven Vale communities west of the hill and the East Brighton and Bristol Estate (Donald Hill Road) and Whitehawk communities to the east of the hill.

Vehicular, cycling and easy walking routes between these two parts of the city are all limited to the roads around the hill. The footpaths which do exist over the hill do not provide good connections, and given the topography are ones most residents would be unlikely to use for day-to-day access.



We do think that it is sensible to include the Craven Vale area (Queensway, Craven Road and the Causeway) in the same ward as Sutherland Road. The existing warding arrangements place Craven Vale in East Brighton ward, but the area is clearly geographically separate from the rest of the existing ward.

However, we object to the proposals to move the areas around Freshfield Road and Sutherland Road into East Brighton.

Although a thoroughfare, we do not think that Freshfield Road is an appropriate boundary between the wards. The houses on both sides of the road share all the same characteristics, the demographics are the same, and residents use the same schools, shops, pubs and facilities. The areas east of Freshfield Road do not share community, demographic or economic links with the areas in East Brighton. The main public transport link in this area, via the number 2 bus route, links Woodingdean, Queen's Park and the city centre. Residents have expressed concern to us that councillors for the proposed East Brighton would naturally focus on the heart of their ward in Whitehawk.

Indeed, the mini-neighbourhoods in this part of the existing Queen's Park ward form their community links and share amenities with their adjoining neighbourhoods to the west not the east. The area known as Baker's Bottom (Rochester Street, Hendon Street and Bute Street) is a relatively short walk away from the park itself.

Residents in all these neighbourhoods use community facilities in Queen's Park ward. Queen's Park is the nearest formal green space and playground to these areas. The Queen's Park School, Royal Spa Nursery and St Luke's School are all attended by children in the area.

These arguments also apply to the area surrounding Brighton College (Canning Street, College Terrace and Walpole Terrace).

All these areas look towards Queen's Park and are separated from Whitehawk and the Bristol Estate (Donald Hall Road) by Whitehawk Hill and the Royal Sussex County Hospital campus. They should remain part of Queen's Park ward.

Finally, as we noted in the section above, residents in the streets around St Luke's Primary School all strongly consider themselves to be part of Queen's Park. They are simply not part of either the Hanover community on the other side of Queen's Park Road or the Pankhurst Estate north of Down Terrace. It does not make sense to divide these streets between wards.

We set out our proposed Queen's Park ward below but will first consider other areas to the south and east of the ward.

East Brighton/Whitehawk & Marina

The communities of Whitehawk, Roedean and Marina Village are physically disconnected from other areas of the city by Whitehawk Hill, the Seafront cliffs and open fields. This means that some degree of disconnection from other areas of their electoral ward is inevitable.

We have already set out in the section above the topography of the city which causes a natural separation between Queen's Park, Baker's Bottom and Craven Vale to the west and Whitehawk and the Bristol Estate to the east.

That said, the Roedean/Cliffs area sits immediately south of East Brighton Park and East Brighton Golf course, while the main route in and out of the Marina (Marina Way) leads directly into the Whitehawk area. The Marina has good public transport links into East Brighton via the 21 and 7 bus routes.

So, while the very nature of the Marina's construction rather separates it from all other parts of the city, we feel the factors above make the Marina a more suitable match with East Brighton and Whitehawk, with whom they will share common political, infrastructure and service issues.

Kempton

Kempton is understood both within and beyond Brighton to include the space between Old Steine, Marine Parade, Edward Street and Boundary Road.

We acknowledge that this area is too big for a two-seat ward, and too small for a three-seat ward, so some compromise has to be accepted to meet the commission's criteria.

However, the Commission's current proposal slices Kempton almost in half, leaving much of the Kempton community outside of the Kempton ward.

We believe a more coherent Kempton ward is possible, bringing together residential, retail and community areas along St James's Street, Upper St James's Street and St George's Road, and better reflecting the distinctive history and characteristics of the area: among others, its architecture, its seafront, and the concentration of LGBT venues and community organisations.

Our proposal includes the majority of Kempton in the ward, with only the residential city centre areas which lie between St James's Street and Edward Street, along with other streets which face on to Grand Parade retained in Queen's Park. Given the need for some compromise in determining the boundary of the Kemp Town ward, we feel these areas which are situated nearest to the city centre and furthest away from the Kempton village centre and the sea front are most suitable for retention within the current Queen's Park ward. We would however suggest that some roads to the north of St James Street are better located within Kempton. George Street is predominantly commercial. Dorset Gardens Peace Park and Dorset Gardens Methodist Church both host

community events, including many events held by the LGBT community, and so we feel are better located within the Kemptown ward.

Proposed configuration for Eastern Brighton wards

We propose the following alternative warding pattern for the wards in Eastern Brighton.

As noted above, we propose retaining **Hanover & Elm Grove** ward exactly as it is now, rather than with the revised boundaries in the Commission's proposal.

For **Queen's Park** ward:

- We propose maintaining existing northern boundaries between Queen's Park and Hanover & Elm Grove from St. Peter's Church along Albion Hill, Queen's Park Road and Down Terrace.
- To include Craven Vale and Baker's Bottom, we propose the boundary should then follow the existing boundary (between Hanover & Elm Grove and East Brighton) to the rear of properties in Queensway and Freshfield Road, then run along Manor Hill Road, then south to meet the end of Whitehawk Hill Road before crossing the hill to meet the existing Queen's Park / East Brighton boundary near Parham Close and Rochester Street.
- The boundary should then follow the existing boundary south along the rear of the eastern side of Walpole Terrace (the boundary of the Baker's Bottom community) and follow Walpole Road west and then south to the junction with Eastern Road.
- The boundary should then follow Eastern Road west to the junction of Upper Rock Gardens and Edward Street, then follow Upper Rock Gardens south until near to the junction with St James's Street.
- To keep commercial properties and amenities, especially those used by the LGBT community, within our proposed Kemptown ward, we propose the boundary runs behind properties situated on the north of St James's Street - except that, properties in George Street and Dorset Gardens are also better located in the Kemptown ward.
- Our proposed boundary would then meet the existing Queen's Park boundary just north of the corner of St James's Street and Old Steine, and run north along that existing boundary back towards St Peter's Church where Waterloo Place and Richmond Place meet.

For **Kemptown** ward:

- We propose the boundary runs north from Palace Pier (following the existing boundary between St Peter's & North Laine and Queen's Park ward) as far as St James's Street.
- From there it should go east (see also above section re Queen's Park) generally to the rear of properties on the north side of St James's Street but also taking in properties in George Street and Dorset Gardens.
- At the corner of St James Street and Upper Rock Gardens, we propose the boundary then goes north to the junction with Edward Street and then east along Eastern Road, until it meets the existing boundary between the existing Rottingdean Coastal and East Brighton wards, at the junction of Eastern Road and Church Place.
- We propose it then goes north along Church Place, then east along Bristol Gardens as far as Boundary Road.
- Finally, the boundary should run south along Boundary Road before crossing Marine Drive to meet the coast.

Consequently, the western boundaries of our proposed **Whitehawk & Marina** ward would be drawn so that:

- Kemptown west of Boundary Road is contained within our proposed Kemptown ward;
- the communities of Baker's Bottom and Craven Vale are retained in Queen's Park ward.

The eastern boundaries of our proposed **Whitehawk & Marina** ward should comprise:

- the current and proposed boundaries between East Brighton and Woodingdean wards
- the currently proposed boundary between Kemptown & Marina and Rottingdean & West Saltdean, namely running down Cattle Hill such that all of Roedean and Brighton Marina are within our proposed Whitehawk & Marina ward.

The boundaries of Whitehawk & Marina ward should therefore match the proposed boundary of Woodingdean and Rottingdean & West Saltdean. This therefore makes no changes to either of those wards.

We believe our proposal retains existing important community links, and indeed improves them by bringing together some communities currently divided. Our calculations suggest the proposed pattern should provide better electoral equality than the current proposals: Kemptown +4% vs -7% for the proposed Kemptown & Marina, Whitehawk & Marina at +2% vs the currently proposed 3%, Hanover & Elm Grove at +5% vs the currently proposed +9%, and Queen's Park at +5% vs over 10% in the current proposals (as we described above).

Rottingdean & West Saltdean and Woodingdean

Finally, we thank the commission for its recommendations for these wards, which align with the proposals made by ourselves and others. We believe this warding pattern reflects community links and the geography of "the Deans" well.

We also support the recommendation of the name of "Rottingdean & West Saltdean".