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New electoral arrangements for Waltham Forest Council Final Recommendations

December 2020

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A note on our mapping:

The maps shown in this report are for illustrative purposes only. Whilst best efforts have been made by our staff to ensure that the maps included in this report are representative of the boundaries described by the text, there may be slight variations between these maps and the large PDF map that accompanies this report, or the digital mapping supplied on our consultation portal. This is due to the way in which the final mapped products are produced. The reader should therefore refer to either the large PDF supplied with this report or the digital mapping for the true likeness of the boundaries intended. The boundaries as shown on either the large PDF map or the digital mapping should always appear identical.

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Introduction

Who we are and what we do

1 The Local Government Boundary Commission for England (LGBCE) is an independent body set up by Parliament.¹ We are not part of government or any political party. We are accountable to Parliament through a committee of MPs chaired by the Speaker of the House of Commons. Our main role is to carry out electoral reviews of local authorities throughout England.

2 The members of the Commission are:

- Professor Colin Mellors OBE (Chair)
- Andrew Scallan CBE (Deputy Chair)
- Susan Johnson OBE
- Peter Maddison QPM
- Amanda Nobbs OBE
- Steve Robinson
- Jolyon Jackson CBE (Chief Executive)

What is an electoral review?

3 An electoral review examines and proposes new electoral arrangements for a local authority. A local authority's electoral arrangements decide:

- How many councillors are needed.
- How many wards or electoral divisions there should be, where their boundaries are and what they should be called.
- How many councillors should represent each ward or division.

4 When carrying out an electoral review the Commission has three main considerations:

- Improving electoral equality by equalising the number of electors that each councillor represents.
- Ensuring that the recommendations reflect community identity.
- Providing arrangements that support effective and convenient local government.

5 Our task is to strike the best balance between these three considerations when making our recommendations.

¹ Under the Local Democracy, Economic Development and Construction Act 2009.

6 More detail regarding the powers that we have, as well as the further guidance and information about electoral reviews and review process in general, can be found on our website at www.lgbce.org.uk

Why Waltham Forest?

7 We are conducting a review of Waltham Forest Council ('the Council') as its last review was completed in 1999 and we are required to review the electoral arrangements of every council in England 'from time to time'.² In addition, the value of each vote in borough council elections varies depending on where you live in Waltham Forest. Some councillors currently represent many more or fewer voters than others. This is 'electoral inequality'. Our aim is to create 'electoral equality', where votes are as equal as possible, ideally within 10% of being exactly equal.

8 This electoral review is being carried out to ensure that:

- The wards in Waltham Forest are in the best possible places to help the Council carry out its responsibilities effectively.
- The number of voters represented by each councillor is approximately the same across the borough.

Our proposals for Waltham Forest

9 Waltham Forest should be represented by 60 councillors, the same number as there are now.

10 Waltham Forest should have 22 wards, two more than there are now.

11 The boundaries of all wards should change; none will stay the same.

12 We have now finalised our recommendations for electoral arrangements for Waltham Forest.

How will the recommendations affect you?

13 The recommendations will determine how many councillors will serve on the Council. They will also decide which ward you vote in and which other communities are in that ward. Your ward name may also change.

14 Our recommendations cannot affect the external boundaries of the borough or result in changes to postcodes. They do not take into account parliamentary constituency boundaries. The recommendations will not have an effect on local

² Local Democracy, Economic Development & Construction Act 2009 paragraph 56(1).

taxes, house prices, or car and house insurance premiums and we are not able to consider any representations which are based on these issues.

Review timetable

15 We wrote to the Council to ask its views on the appropriate number of councillors for Waltham Forest. We then held three periods of consultation with the public on warding patterns for the borough. The submissions received during consultation have informed our final recommendations.

16 The review was conducted as follows:

Stage starts	Description
16 April 2019	Number of councillors decided
4 June 2019	Start of consultation seeking views on new wards
12 August 2019	End of consultation; we began analysing submissions and forming draft recommendations
17 December 2019	Publication of draft recommendations; start of second consultation
2 March 2020	End of consultation; we began analysing submissions and forming new draft recommendations
7 July 2020	Publication of new draft recommendations; start of third consultation
14 September 2020	End of consultation; we began analysing submissions and forming final recommendations
1 December 2020	Publication of final recommendations

Analysis and final recommendations

17 Legislation³ states that our recommendations should not be based only on how many electors⁴ there are now, but also on how many there are likely to be in the five years after the publication of our final recommendations. We must also try to recommend strong, clearly identifiable boundaries for our wards.

18 In reality, we are unlikely to be able to create wards with exactly the same number of electors in each; we have to be flexible. However, we try to keep the number of electors represented by each councillor as close to the average for the council as possible.

19 We work out the average number of electors per councillor for each individual local authority by dividing the electorate by the number of councillors, as shown on the table below.

	2018	2025
Electorate of Waltham Forest	182,195	193,060
Number of councillors	60	60
Average number of electors per councillor	3,037	3,218

20 When the number of electors per councillor in a ward is within 10% of the average for the authority, we refer to the ward as having 'good electoral equality'. All but one of our proposed wards for Waltham Forest will have good electoral equality by 2025, with the exception of Upper Walthamstow, which will have 11% fewer electors than the borough average.

Submissions received

21 See Appendix C for details of the submissions received. All submissions may be viewed at our offices by appointment, or on our website at www.lgbce.org.uk

Electorate figures

22 The Council submitted electorate forecasts for 2025, a period five years on from the scheduled publication of our final recommendations in 2020. These forecasts were broken down to polling district level and predicted an increase in the electorate of around 6% by 2025.

23 During our earlier consultations we received a number of comments questioning whether specific developments have been taken into account. One

³ Schedule 2 to the Local Democracy, Economic Development and Construction Act 2009.

⁴ Electors refers to the number of people registered to vote, not the whole adult population.

resident questioned whether the development of Whipps Cross Hospital site had been included, while another questioned whether the development of Walthamstow Town Hall has been taken into account. We noted the comments, but believed that both developments were likely to be completed beyond the forecast period. In response to the new draft recommendations, a resident argued that we should consider developments included in the Local Plan, beyond 2025 and as far as 2035. We note these comments, but are unable to consider development beyond the five-year forecast period.

24 In response to our new draft recommendations, Councillor Littlejohn expressed concern about the levels of voter registration in the Cann Hall and Cathall areas, arguing that low registration meant the areas contain more electors than the figures show. We note Councillor Littlejohn's concerns, but we are only able to have consideration for those people included on the electoral register, or forecast to be added across the forecast period. Therefore, we do not propose any changes to the allocation of councillors for these areas. During this consultation period, a number of additional residents asked if we had considered development included in the Local Plan, beyond 2025. However, we are unable to consider growth beyond the forecast period.

25 We considered the information provided by the Council and are satisfied that the projected figures are the best available at the present time. We have used these figures to produce our final recommendations.

Number of councillors

26 Waltham Forest Council currently has 60 councillors. The Waltham Forest Council Labour Group ('the Labour Group') proposed the retention of 60 councillors, while the Waltham Forest Council Conservative Group ('the Conservative Group') proposed increasing the number by three, to 63 councillors.

27 We noted that both groups were primarily concerned with pressures on workload resulting from changes to communication and working practices, population increases and demographics. We concluded that while there are undoubtedly pressures on workload, the Conservative Group did not provide sufficiently compelling evidence to suggest an increase was required. We noted the Labour Group's argument that in light of these pressures, a reduction in council size should be avoided. We therefore invited proposals for new patterns of wards that would be represented by 60 councillors.

28 We received no significant comments on the number of councillors in response to our consultations on warding patterns, original draft recommendations or new draft recommendations and we have therefore based our final recommendations on a 60-member council.

29 A number of respondents questioned the number of councillors allocated to each ward, with a couple questioning how wards with few councillors would be represented. We note these concerns, but we can have no presumption of a uniform pattern of wards as part of this review. Wards with fewer councillors have fewer electors, so the level of representation is broadly the same as other wards.

Ward boundaries and draft recommendations

30 The Commission considered 18 local submissions in drawing up its original draft recommendations for Waltham Forest, which were published on 17 December 2019. We received 94 submissions in response to our consultation on the draft recommendations.

31 However, after the close of the consultation on the draft recommendations, we noted that due to an administrative error, 22 submissions were not considered during the formulation of the draft recommendations. Therefore, we took a decision to withdraw the original draft recommendations and prepare new draft recommendations for consultation across the borough. These new draft recommendations took into account all of the submissions we received across both consultation periods.

32 In putting together the new draft recommendations, we analysed a total of 134 submissions, including identical borough-wide schemes from the Conservative Group and Chingford & Woodford Green and Leyton & Wanstead conservative associations. The Labour Group also put forward a borough-wide proposal. Waltham Forest Liberal Democrats put forward borough-wide comments. The remainder of the submissions provided localised comments for warding arrangements in particular areas of the borough.

33 Our new draft recommendations also took into account local evidence that we received, which provided further evidence of community links and locally recognised boundaries. In some areas we considered that the proposals did not provide for the best balance between our statutory criteria and so we identified alternative boundaries.

34 The ward boundaries and names in our new draft recommendations contained a number of significant changes to the original draft recommendations. They were based on a mixture of the Conservative and Labour proposals, along with a small amendment to strengthen ward boundaries.

35 Our new draft recommendations were for 18 three-councillor wards and three two-councillor wards. We considered that our new draft recommendations would provide for good electoral equality while reflecting community identities and interests where we received such evidence during consultation.

New draft recommendations consultation

36 We received 178 submissions during consultation on our new draft recommendations. These included a mixture of support and objections to our new draft recommendations across the borough. A significant number of the comments related to our Hale End & Highams Park South ward which crossed the A406.

37 Our final recommendations are based on the new draft recommendations with a modification between Hale End & Highams Park South and Wood Street wards. We also propose a more minor amendment between Chapel End and William Morris wards.

38 Given the travel restrictions, and the social distancing, arising from the Covid-19 outbreak, there was a detailed virtual tour of Waltham Forest. This helped to clarify issues raised in submissions and assisted in the construction of our proposals.

Final recommendations

39 Our final recommendations are for 16 three-councillor wards and six two-councillor wards. We consider that our final recommendations will provide for good electoral equality while reflecting community identities and interests where we received such evidence during consultation.

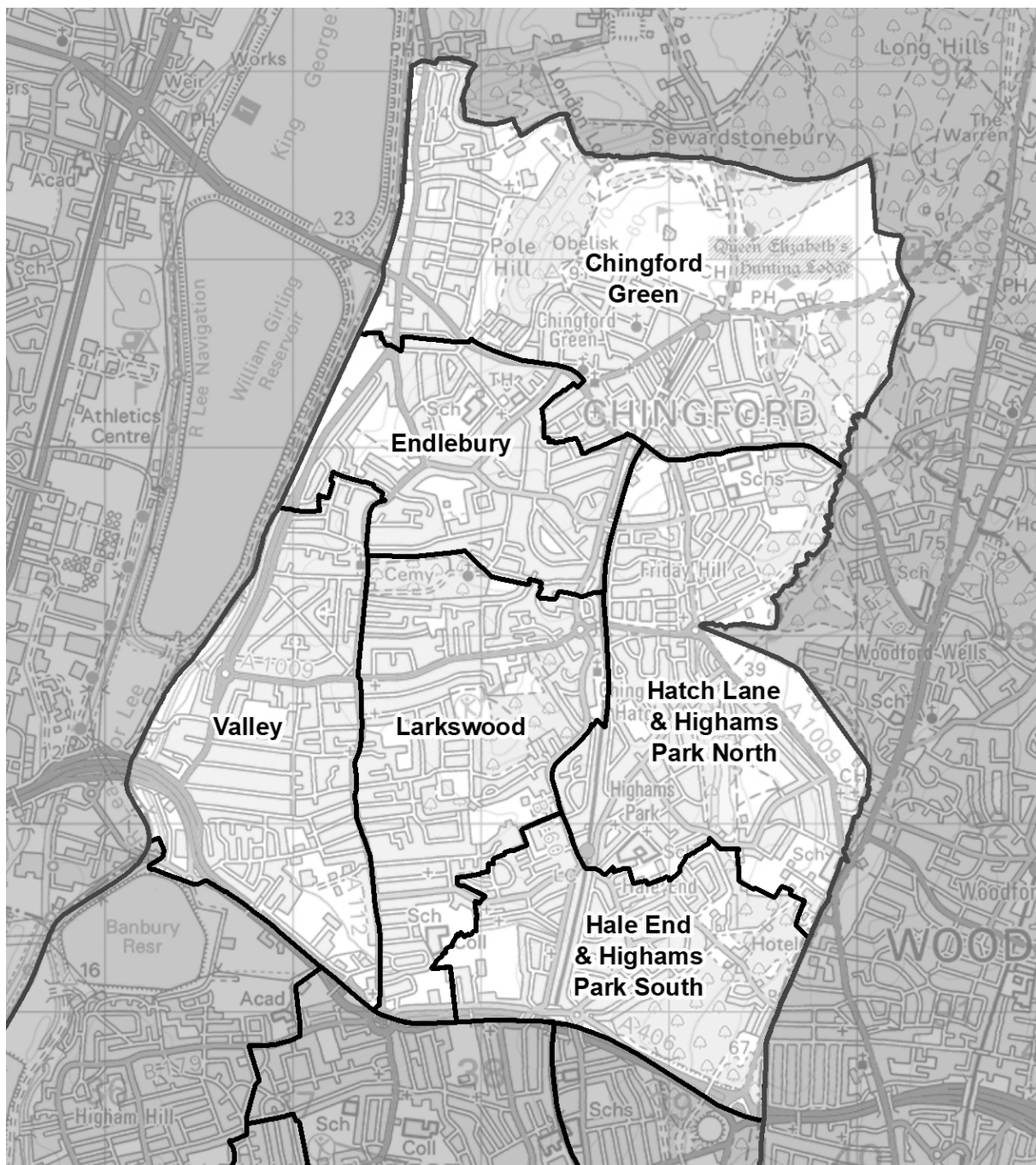
40 The tables and maps on pages 9–24 detail our final recommendations for each area of Waltham Forest. They detail how the proposed warding arrangements reflect the three statutory⁵ criteria of:

- Equality of representation.
- Reflecting community interests and identities.
- Providing for effective and convenient local government.

41 A summary of our proposed new wards is set out in the table starting on page 31 and on the large map accompanying this report.

⁵ Local Democracy, Economic Development and Construction Act 2009.

North Waltham Forest



Ward name	Number of councillors	Variance 2025
Chingford Green	3	-8%
Endlebury	2	4%
Hale End & Highams Park South	2	3%
Hatch Lane & Highams Park North	3	2%
Larkswood	3	-3%
Valley	3	3%

Chingford Green, Endlebury, Hatch Lane & Highams Park North

42 In response to our new draft recommendations for these wards we received general support as well as some limited objections.

43 Sir Iain Duncan Smith MP expressed support for the inclusion of the town centre in our proposed Chingford Green ward and for using Whitehall Road as the boundary between Chingford Green and Hatch Lane & Highams Park North wards. Councillors Hemsted and Seesunkur also expressed support for the inclusion of the town centre in a single ward. Councillors Coghill and Fitzgerald and 10 local residents expressed support for using Whitehall Road as the boundary between Chingford Green and Hatch Lane & Highams Park North wards. One resident objected, arguing the Courtland Avenue area is cut off from Hatch Lane & Highams Park North ward. A resident stated that Endlebury and Chingford Green wards should be combined.

44 A small number of local residents objected to the inclusion of parts of the existing Endlebury ward in the Valley ward, arguing that they look to Endlebury.

45 The Labour Group expressed general support for these wards, with Councillor Miller expressing support for the Labour Group comments. However, the Labour Group expressed concern about the Hatch Lane & Highams Park North ward name, arguing that the inclusion of 'Highams Park' in both this ward and the ward to the south creates confusion. It also said that the name was too long, but did not provide any alternatives. Two local residents also objected to the ward name, with one accepting that while the ward may contain some areas of Highams Park, the existing ward includes much of the same area but does not include it in the name. He argued that inclusion of 'Highams Park' in both wards might create confusion. One of the residents argued that the ward should just be called Hatch Lane.

46 A local resident expressed support for the southern boundary of Hatch Lane & Highams Park North ward around Woodford County High School for Girls.

47 We have given careful consideration to the evidence received. We note that there was general support for the new draft recommendations for these wards, with only limited objections. We note the comments about the boundary between Endlebury and Valley wards but are not persuaded by the limited evidence provided in the submissions. We also note that amending the boundary would worsen electoral equality in Endlebury ward. We are therefore not persuaded to amend this boundary.

48 As a result of the general support received during consultation, we are confirming our new draft recommendations for these wards as final. Finally, we note the concerns about the Hatch Lane & Highams Park North ward name. However, in

light of no agreement over proposed alternatives, we are retaining the name, noting that it reflects the constituent areas.

Larkswood and Valley

49 In response to our new draft recommendations for these wards we received general support and some limited objections. The Labour Group expressed support for the new draft recommendations for these wards, including the inclusion of the Shadbolt Avenue area to the south of the A406 in Valley ward. Councillor Baptiste expressed support for the Labour Group comments. A local resident expressed support for the inclusion of the Shadbolt Avenue area in Valley ward. As stated above, a number of residents objected to the inclusion of part of the existing Endlebury ward in the proposed Valley ward.

50 Walthamstow Stadium Place Tenants' & Residents' Association and Walthamstow Stadium Residents' Association both expressed support for using the A406 as the southern boundary of Larkswood ward and including the areas they cover in this ward, rather than Chapel End ward. A number of other respondents, including Sir Iain Duncan Smith MP, supported the A406 as a boundary. One local resident argued that Wadham Road should not be divided between Larkswood and Hale End & Highams Park South wards. Another argued that Larkshall Road should remain in Larkswood ward, not Hale End & Highams Park South ward.

51 We have given careful consideration to the evidence received, noting the general support for the new draft recommendations. As discussed above in the Chingford Green, Endlebury, Hatch Lane & Highams Park North section, we note the comments about the boundary between Endlebury and Valley wards. However, we are of the view that we received only limited evidence and amending the boundary would worsen electoral equality in Endlebury ward. We are therefore not persuaded to amend this boundary.

52 We also note the comments about Larkshall and Wadham roads, but we have not been persuaded by the limited evidence. We are not therefore proposing any amendment and are confirming our new draft recommendations for these wards as final.

Hale End & Highams Park South

53 We received a mixture of support and objections for this ward. The Labour Group and Councillors Dore, Rehman and Sweden and a couple of local residents all expressed support for the new draft recommendations. They reiterated the arguments put forward during the last stage of consultation, arguing that the area to the south of the A406, north of Forest Road, has good links into the Hale End & Highams Park South ward. They reiterated that Forest Road is a clear boundary and that this area has bus links north and that residents use services there, as well as

using Highams Park station. They also argued that there are a number of pedestrian links under the A406, as well as the road link via Hale End Road.

54 Highams Park Planning Group also expressed support for the new draft recommendations, putting forward similar arguments to those outlined above. It reiterated links between the area to the south of the A406, expressing concern that the original draft recommendations did not include this area and reduced the ward to two members. It also supported the inclusion of the Winchester Road area in the proposed ward and the inclusion of The Charter Road area in the Hatch Lane & Highams Park North ward. A local resident argued that the whole of the area covered by Highams Park Planning Group should be in a ward represented by four councillors.

55 A small number of residents expressed support for Hale End & Highams Park South ward, arguing that the A406 is not a significant boundary. The submissions also noted that in addition to the existing ward, earlier wards have crossed the A406. They also argued that including the area to the south of the A406 in the Wood Street area will have a negative knock-on effect to the warding pattern for Wood Street.

56 A number of local residents also supported the inclusion of the Winchester Road area in the Hale End & Highams Park South ward, rather than Chapel End as it currently is. They cited road links and the use of facilities in the proposed ward, adding that the A406 is a significant barrier.

57 We also received significant objections to new draft recommendations, specifically the proposal to include the area to the south of the A406 in Hale End & Highams Park South ward. The Conservative Group put forward a number of objections, arguing that the A406 is a significant boundary, far harder to cross than Forest Road which, while also an A road, is residential, with a 20mph speed limit and a number of pedestrian crossings. It also argued that while there are bus links north along Hale End Lane, consideration should also be given to the bus links into Wood Street, which it stated are a short walk from this area. It also acknowledged our concerns that removing this area from Hale End & Highams Park South ward, and therefore transferring it south, would mean the Wood Street area would be entitled to four councillors and as such should be divided into a number of wards. The Conservative Group therefore proposed two two-councillor wards (discussed in more detail in the Hoe Street and Upper Walthamstow & Wood Street sections, below).

58 Chingford & Woodford Green Conservative Association and Leyton & Wanstead Conservative Association both endorsed the Conservative Group's proposals. Walthamstow Conservative Association also argued that the A406 is a significant boundary and that the area to the south should be included in two two-councillor wards.

59 Sir Iain Duncan Smith MP and Councillors Best, Coghill, Fitzgerald, Halebi, Hemsted, James, Moss, Saumarez and Seesunkur also objected to the inclusion of the area to the south of the A406 in Hale End & Highams Park South ward. They put forward similar evidence to the Conservative Group, arguing that the A406 effectively marks the difference between Chingford to the north and Walthamstow to the south. They questioned why people travelling into London by train would head north to Highams Park station, when Wood Street station is a similar distance away and one stop closer to central London.

60 Around 40 local residents also objected to the inclusion of the area to the south of the A406 in Hale End & Highams Park South ward, putting forward similar arguments to those above. They also cited links to shops on Wood Street and argued that the A406 had been deemed to be a significant boundary for the majority of the rest of the borough. A couple of residents argued that this area should be in Chapel End ward.

61 We have given careful consideration to the evidence received, noting that while there was support for the new draft recommendations, there were also significant objections. We note the suggestion that the area to the south could be included in Chapel End ward, but this would worsen electoral equality there to over 20% more electors than the borough average by 2025. We do not consider there to be sufficient evidence to adopt a ward with such poor electoral equality.

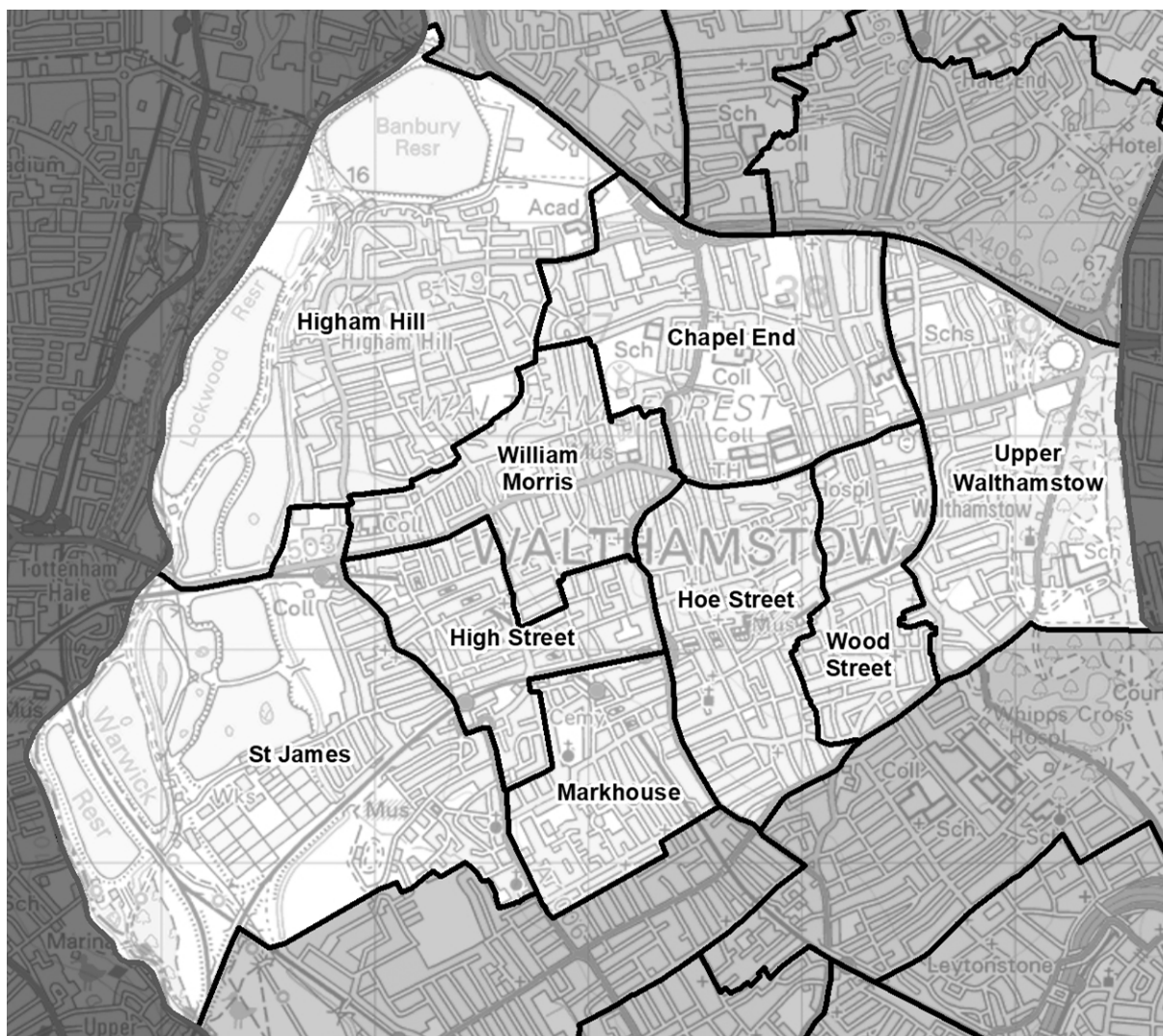
62 We note the argument that the existing and earlier wards crossed the A406. However, we consider that the objections to the new draft recommendations have put forward a range of persuasive arguments, in some places specifically countering the arguments put forward during the previous stage of consultation. On balance, we are persuaded that the A406, as a multi-lane road, forms a significant barrier and while there are communication links north, the links across Forest Road are better. In addition, while residents may access some services to the north, we are persuaded that they also access them south towards Wood Street.

63 One of our considerations as part of the new draft recommendations was the difficulty in identifying a viable warding pattern that could include the area to the south of the A406 in the Wood Street area. However, we now note that the Conservative Group has proposed a reasonable warding pattern that includes this area – these proposals are discussed in detail below. We also note that removing this area from the three-councillor Hale End & Highams Park South ward leaves a two-councillor Hale End & Highams Park South ward, as proposed in our original draft recommendations, which has good levels of electoral equality.

64 Therefore, we are reverting to the proposals in our original draft recommendations for a two-councillor Hale End & Highams Park South ward. We note that there were some concerns over the name of this ward. However, as

disused in the Chingford Green, Endlebury, Hatch Lane & Highams Park North section, in light of no agreement over proposed alternatives, we are retaining the name as part of our final recommendations, noting that it reflects the constituent areas.

Central Waltham Forest



Ward name	Number of councillors	Variance 2025
Chapel End	3	-5%
High Street	3	-1%
Higham Hill	3	2%
Hoe Street	3	7%
Markhouse	2	-4%
St James	3	-5%
Upper Walthamstow	2	-11%
William Morris	3	2%
Wood Street	2	4%

Hoe Street

65 There was generally support for the Walthamstow Village ward proposed in our new draft recommendations, particularly in relation to the eastern boundary towards Wood Street ward, around Shernhall Street. However, there were objections to the

ward name, with some respondents arguing it should be called Hoe Street ward. The Labour Group expressed support for the ward, but that it had no 'strong view' on the ward name. Council Mahmud expressed support for the ward, referring to it as Hoe Street.

66 A local resident argued that Ledger Mews should be included in the ward, rather than Markhouse ward. However, there was limited evidence for this amendment and it would worsen electoral equality in both wards, also moving away from the clear boundary of Hoe Street. Therefore, we are not adopting this proposal as part of our final recommendations.

67 While supporting the Walthamstow Village ward's boundaries, a number of local residents objected to the ward name. They argued that the 'Walthamstow Village' name applies only to small area of the proposed ward and does not reflect the wider area. They also argued that 'Hoe Street' is a long-standing name and reflects the fact that the area is bounded by Hoe Street to the west. In our new draft recommendations we acknowledged that some respondents wished to call the ward 'Hoe Street', but that the evidence was not conclusive as others wished to call it 'Walthamstow Village'. However, on balance, in light of the further evidence, we are persuaded to rename the ward. Therefore, we are confirming the boundaries of the Walthamstow Village ward as final, but renaming it Hoe Street.

Upper Walthamstow and Wood Street

68 We received a mixture of support and objections to the Wood Street ward proposed in our new draft recommendations. As discussed in the Hale End & Highams Park South section above, many of the objections related to the argument that the area to the south of the A406 should be included in the Wood Street area, not Hale End & Highams Park South ward. There were also a number of submissions that supported the inclusion of this area in the Hale End & Highams Park South ward and also supported Wood Street ward.

69 The Labour Group expressed support for the new draft recommendations for Wood Street, arguing that the ward resolved concerns about dividing Shernhall Street. It also supported the fact that it placed the area to the north of Forest Road in Hale End & Highams Park South ward, citing links across the A406, rather than to the Wood Street area. Councillors Dore and Rehman supported the inclusion of this area in Hale End & Highams Park South ward, rejecting links to Wood Street. Councillors Ashworth te Velde and Sweden expressed support for the new draft recommendation for Wood Street ward, with Councillor Sweden reiterating and adding to his earlier evidence for this ward. He expressed support for the proposal not to divide the Shernhall Street area, arguing that this looks to Wood Street, not Walthamstow Village. He reiterated that Wood Street ward contains a wide range of facilities and services that act as a focus for the ward. This view was shared by local

residents who argued that the A406 was not a significant barrier and that a number of previous wards, as well as the existing one, crossed the road.

70 As discussed in detail in paragraphs 53–64 in the Hale End & Highams Park South section, we received significant objections to the warding arrangements in this area. These included submissions from the Conservative Group, Sir Iain Duncan Smith MP, Councillors Best, Coghill, Fitzgerald, Halebi, Hemsted, James, Moss, Saumarez and Seesunkur, as well as around 40 local residents. All of these respondents argued that the A406 was a significant boundary and that a warding arrangement which crossed the road did not reflect local communities. The Conservative Group therefore proposed an alternative arrangement of two two-councillor wards for the area south of the A406, responding to the concerns we raised in our new draft recommendations that we had been unable to identify a pattern of wards for the area while retaining the A406 as a boundary.

71 The Conservative Group proposed a two-councillor Wood Street ward comprising the north of Wood Street and Shernhall Street and a two-councillor Upper Walthamstow ward comprising the south end of Wood Street and the area to the south of the A406. It acknowledged that their Upper Walthamstow ward crossed Forest Road, but as argued above, this would be preferable to crossing the A406. It also acknowledged that its proposal would split Wood Street, but that the area to the south of the railway is more residential, containing only a small section of retail that is designated 'secondary town centre', while the town centre core is to the north and retained in the Wood Street ward. It stated that its proposal reflected the 'strong argument' for retaining Shernhall Street in a Wood Street ward. Its Upper Walthamstow and Wood Street wards would have 6% and 1% fewer electors than the borough average by 2025.

72 Chingford & Woodford Green Conservative Association and Leyton & Wanstead Conservative Association both endorsed the Conservative Group's proposals.

73 We have given careful consideration to the evidence received. As stated in the Hale End & Highams Park South section, we note that while there was support for including the area to the south of the A406 in Hale End & Highams Park South, there were also significant objections, with argument for including it in the Wood Street area.

74 We note the argument that the existing and earlier wards crossed the A406. However, we consider that the objections to the new draft recommendations have put forward a range of persuasive arguments, in some places specifically countering the arguments put forward during the previous stage of consultation. On balance, we are persuaded that the A406, as a multi-lane road, forms a significant barrier and while there are communication links north, the links across Forest Road are better. In

addition, while residents may access some services to the north, we are persuaded that they also access them south towards Wood Street. We therefore consider this area should be included in Wood Street.

75 We have examined the Conservative Group's proposals for two two-councillor wards for the Wood Street area, to accommodate the area to the south of the A406. While we acknowledge that there was support for the Wood Street ward we proposed in our new draft recommendations, as well as the argument for keeping the whole of Wood Street in the ward, we note that the Conservative Group's proposals do not breach the boundary with Walthamstow Village ward (renamed Hoe Street as part of the final recommendations). Its proposals also retain the whole of Shernhall Street in a single ward. While its proposals do divide Wood Street, we note that they keep the core of the town centre in a single ward, along with the station, while placing the more residential south area in the Upper Walthamstow ward.

76 The concerns about Wood Street must be balanced against the needs of the area as a whole. We are persuaded that the Conservative Group's proposal provides for a warding arrangement that reflects the A406 as a strong and identifiable boundary and creates coherent wards for the Wood Street area.

77 However, while we believe there are good links across Forest Road in the Upper Walthamstow ward, we have some concerns about the inclusion of the area off Oliver Road, noting that this has better access on to Shernhall Street. We therefore propose transferring these roads to the two-councillor Wood Street ward. We acknowledge that this worsens electoral equality in Upper Walthamstow to 11% fewer electors than the borough average by 2025, but consider that this amendment provides a better reflection of communities and a strong boundary. This also slightly worsens electoral equality in Wood Street to 4% more electors than the borough average by 2025.

Chapel End, Higham Hill and William Morris

78 We received general support for our new draft recommendations for these wards, although there were also a number of objections, with respondents proposing minor amendments. The Labour Group expressed support for these wards. Councillors Douglas, Mitchell and Terry expressed support for the Chapel End ward, particularly the proposal not to cross the A406, unlike the existing ward. Sir Iain Duncan Smith MP also supported the use of the A406 as a boundary between Chapel End and Larkwood wards. A number of local residents supported the Chapel End ward, although one argued that Lloyd Park should be in a single ward.

79 A couple of residents argued that the area to the south of the A406 in the Hale End & Highams Park South ward included in our new draft recommendations should be in Chapel End ward.

80 Friends of Lloyd Park and a number of local residents argued that the area around Dudley Road to the east of Lloyd Park should be included in William Morris ward. They highlighted links between these roads and Lloyd Park relating to use of the park, their direct pedestrian access, and also issues around parking, including the Lloyd Park car park.

81 Councillors Ali, Bellamy and Strathern and a number of local residents expressed support for Higham Hill ward. Another local resident proposed an amendment between Higham Hill and William Morris ward, arguing it provided a clearer boundary around Green Pond Close and Chamberlain Place. Two local residents objected to the inclusion of the area of development to the north of Blackhorse Road station in St James ward, with one arguing it should be in Higham Hill ward and the other that it should be included in the Higham Hill ward we proposed as part of our original draft recommendations. One resident requested the retention of the existing wards.

82 Councillors Lacey-Holland and Williams and a local resident expressed support for the William Morris ward. Another resident objected to it, but did not provide an alternative.

83 We have given careful consideration to the evidence. We note the broad support for our proposals, but have examined the alternative proposals put forward by a number of respondents. As argued in the Hale End & Highams Park South section above, we note that including the area to the south of the A406 in Chapel End ward would worsen electoral equality there to over 20% more electors than the borough average by 2025. We do not consider there to be sufficient evidence to adopt a ward with such poor electoral equality.

84 We also note the proposal to amend the boundary between Higham Hill and William Morris ward. However, we note that there was no other support for this and it would worsen electoral equality in Higham Hill ward. We are therefore not adopting it as part of our final recommendations. We also note the comments about the Blackhorse Road station area of Higham Hill, but this area will contain a significant number of electors as it is developed and moving it out of St James ward would worsen electoral equality there to 27% fewer electors than the borough average by 2025. We do not propose adopting a ward with such poor electoral equality.

85 Finally, we note the objections to the inclusion of the roads to the east of Lloyd Park in Chapel End ward. We also note the suggestion that the whole of Lloyd Park should be in a single ward. As with the new draft recommendations, we do not consider there to be sufficient agreement to include the whole of Lloyd Park in one ward, therefore we are retaining the new draft recommendation boundary through the park. However, we do consider the evidence for including the roads to the east of the park to be persuasive, particularly given their proximity to the park and issues

around parking. We therefore propose a small amendment, transferring these roads from Chapel End ward to William Morris ward. This slightly worsens electoral equality in both wards from 1% fewer and 2% fewer electors than the borough average by 2025, respectively, to 5% fewer and 2% more. However, we still consider these to be good levels of electoral equality and the amendment reflects persuasive community identity evidence.

86 In light of the general support and lack of other strong evidence, we are confirming our new draft recommendations for these wards as final, subject to the amendment described above.

High Street, St James and Markhouse

87 We received general support for our new draft recommendations for these wards, although there were also a number of objections, with respondents proposing small amendments. The Labour Group expressed general support for these wards.

88 A number of local residents expressed support for St James ward, arguing that the ward is focused around St James Street and St James Street station, adding that this area is distinct from Markhouse. However, as described in the previous section, other residents argued that the area of development around Blackhorse Road station should be Higham Hill ward, not St James.

89 A number of local residents expressed support for the High Street ward, arguing that it avoided splitting the High Street between wards, unlike the original draft recommendations. There was also support for including the Essex Brewery development in this ward. However, another resident objected to the inclusion of the area to the south of South Grove in High Street ward, arguing that the railway is a significant boundary and the area has a different character from the commercial nature of High Street ward.

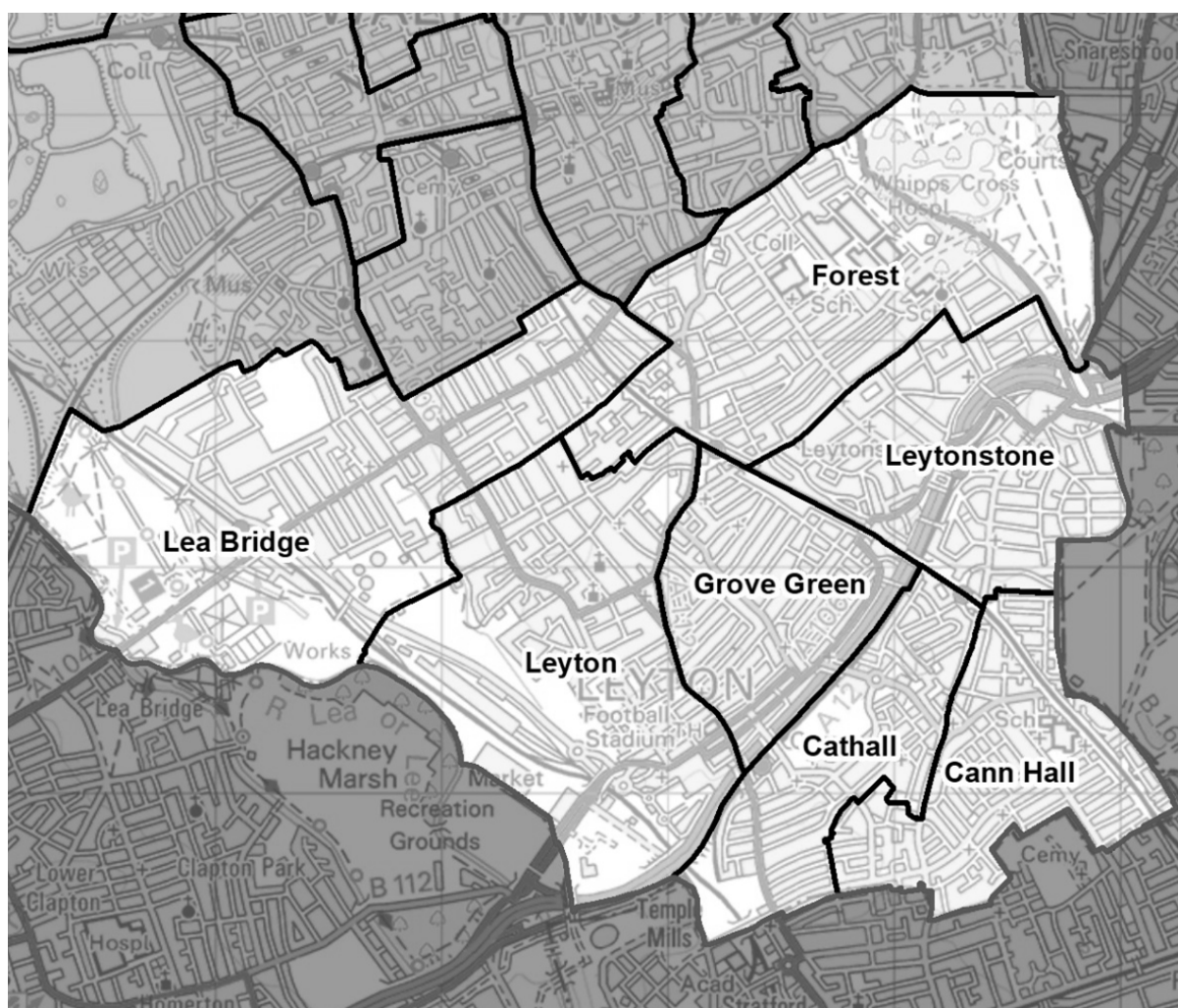
90 A number of residents expressed some regret at the loss of a councillor for Markhouse, but also provided support for the proposed boundaries. As discussed in the Hoe Street section above, one resident argued that Ledger Mews should be in Hoe Street ward, not Markhouse ward.

91 We have given careful consideration the evidence. We note the broad support for our proposals, but have examined the alternative proposals put forward by a number of respondents. As discussed in the Hoe Street section, we have considered the comments about Ledger Mews, but note that there was limited evidence for this amendment and that it would worsen electoral equality in both wards, also moving away from the clear boundary of Hoe Street. Therefore, we are not adopting this proposal as part of our final recommendations.

92 We note the comments about the development around Blackhorse Road station. However, as discussed in the previous section, transferring this area out of St James ward would worsen electoral equality there to 27% fewer electors than the borough average by 2025. We do not propose adopting a ward with such poor electoral equality.

93 We also note the comments about the boundary between Markhouse and High Street wards, including the suggestion that the area to the south of South Grove should be in Markhouse ward, not High Street ward. While we acknowledge that there may be differences in character, transferring that area would worsen electoral equality and we do not consider that we have received sufficient evidence to adopt this. We are therefore confirming our new draft recommendations for these wards as final.

South Waltham Forest



Ward name	Number of councillors	Variance 2025
Cann Hall	3	4%
Cathall	2	8%
Forest	3	8%
Grove Green	3	2%
Lea Bridge	3	0%
Leyton	3	-6%
Leytonstone	3	-4%

Forest, Grove Green, Lea Bridge, Leyton and Leytonstone

94 We received general support for our new draft recommendations for these wards, although there were also a number of objections. The Labour Group expressed support for the new draft recommendations across this area. Councillor Berberi expressed support for Forest ward. Councillor Edwards expressed support for Grove Green and Leyton ward, while Councillor Limbajee also expressed support for Grove Green ward and Councillor Ihenachor expressed support for Leyton ward.

Councillors Gray, Loakes and Pye expressed support for Leytonstone ward, including tying the boundary between Grove Green and Leytonstone wards to the railway, moving Madeira Road into Grove Green ward. Councillors Ahmad and Osho expressed support for Lea Bridge ward.

95 A number of local residents expressed support for these wards. One requested no change to Forest ward, while another objected to the loss of the proposed Bakers Arms ward, arguing that this ward reflected an area that is currently split between three wards.

96 Bushwood Area Residents' Association expressed support for Leytonstone ward. Leyton & Wanstead Conservative Association expressed general support for this proposal, but objected to the boundary between Grove Green and Leytonstone wards, arguing that the proposed boundary divided Connaught School for Girls, which itself is split across two sites, either side of the railway. It argued that the existing wards reflect this, keeping a small area including the school in Leytonstone ward. It added that this area has good links via Madeira Road and Grove Green Road into Leytonstone ward.

97 We have given careful consideration to the evidence received, noting the general support for our new draft recommendations. We note the concerns about the loss of the Bakers Arms ward. While it may be the case that this ward reflected an area that is now divided between wards, there was limited support for the Bakers Arms ward throughout our consultation and we have received considerable support for the wards created from the areas previously included in Bakers Arms. Therefore, we are not persuaded to reinstate the ward. We also note the concerns about Forest ward. While the existing Forest ward has good levels of electoral equality, we must have consideration for the wider area and some adjustment to its boundaries has been necessary to secure electoral equality elsewhere. Therefore, we are not reverting to the existing Forest ward as part of our final recommendations.

98 Finally, we note the concerns about Connaught School for Girls being divided between two wards. While we have some sympathy with this view, we note that retaining the existing boundary also transfers some electors on the west side of the railway to Leytonstone ward. Although there is access under the railway via Grove Green Road, we consider the railway to be a much clearer boundary. Finally, there was some limited support for using the railway line. We are therefore not proposing a change.

99 We are confirming our new draft recommendations for these wards as final.

Cann Hall and Cathall

100 We received some qualified support for our new draft recommendations for these wards, but also a number of objections. The Labour Group expressed qualified

support for the proposals for Cann Hall and Cathall wards, arguing that its original proposals sought to avoid dividing estate areas subject to development. It reiterated its position that this would be favourable, but also accepted that Leytonstone High Road provides a clearer boundary than its proposal.

101 Councillor Littlejohn expressed general support for the proposals. However, as discussed in the council size section above, she also expressed concern about the levels of voter registration in the Cann Hall and Cathall areas, arguing that low registration meant the area contains more electors than the figures show. Councillor Asghar expressed concerns about the new draft recommendations, arguing that the proposals divide the Avenue Estate and roads such as Downsell Road. He argued that the whole of the High Road should be in Cann Hall ward, which would avoid the division of areas of Cathall. A number of local residents also objected to the proposals, particularly in relation to Cathall ward. A couple of residents argued that the area should be given an additional councillor.

102 We have given careful consideration to the evidence received. We note the concerns over our proposals, particularly in relation to Cathall ward. As stated in the council size section, while we understand Councillor Littlejohn's concerns, we can only have consideration for those people included on the electoral register, or forecast to be added across the forecast period. Therefore, we do not propose any changes to the allocation of councillors for this area on this basis. We also note the suggestion that the area should have an additional councillor, but this would give the area the incorrect allocation of councillors and impact electoral equality for all of our proposed wards across the entire borough.

103 Finally, we note Councillor Asghar's comments. We acknowledge these concerns. We looked at the suggested option of transferring the whole of the High Road, and indeed the cul-de-sacs that run off this road, to Cann Hall ward, but this would leave Cathall ward with 19% more electors than the borough average by 2025. We do not propose adopting a ward with this poor level of electoral equality. We are therefore confirming the new draft recommendations for these wards as final.

Conclusions

104 The table below provides a summary as to the impact of our final recommendations on electoral equality in Waltham Forest, referencing the 2020 and 2025 electorate figures. A full list of wards, names and their corresponding electoral variances can be found at Appendix A to the back of this report. An outline map of the wards is provided at Appendix B.

Summary of electoral arrangements

	Final recommendations	
	2018	2025
Number of councillors	60	60
Number of electoral wards	20	22
Average number of electors per councillor	3,037	3,218
Number of wards with a variance more than 10% from the average	4	1
Number of wards with a variance more than 20% from the average	2	0

Final recommendations

Waltham Forest Council should be made up of 60 councillors serving 22 wards representing six two-councillor wards and 16 three-councillor wards. The details and names are shown in Appendix A and illustrated on the large maps accompanying this report.

Mapping

Sheet 1, Map 1 shows the proposed wards for the Waltham Forest Council. You can also view our final recommendations for Waltham Forest Council on our interactive maps at www.consultation.lgbce.org.uk

What happens next?

105 We have now completed our review of Waltham Forest Council. The recommendations must now be approved by Parliament. A draft Order – the legal document which brings into force our recommendations – will be laid in Parliament. Subject to parliamentary scrutiny, the new electoral arrangements will come into force at the local elections in 2022.

Equalities

106 The Commission has looked at how it carries out reviews under the guidelines set out in Section 149 of the Equality Act 2010. It has made best endeavours to ensure that people with protected characteristics can participate in the review process and is sufficiently satisfied that no adverse equality impacts will arise as a result of the outcome of the review.

Appendices

Appendix A

Final recommendations for Waltham Forest Council

	Ward name	Number of councillors	Electorate (2018)	Number of electors per councillor	Variance from average %	Electorate (2025)	Number of electors per councillor	Variance from average %
1	Cann Hall	3	10,141	3,380	11%	10,050	3,350	4%
2	Cathall	2	6,704	3,352	10%	6,964	3,482	8%
3	Chapel End	3	9,032	3,011	-1%	9,204	3,068	-5%
4	Chingford Green	3	8,707	2,902	-4%	8,920	2,973	-8%
5	Endlebury	2	6,552	3,276	8%	6,671	3,336	4%
6	Forest	3	10,267	3,422	13%	10,398	3,466	8%
7	Grove Green	3	9,743	3,248	7%	9,891	3,297	2%
8	Hale End & Highams Park South	2	6,436	3,218	6%	6,631	3,316	3%
9	Hatch Lane & Highams Park North	3	9,561	3,187	5%	9,822	3,274	2%
10	High Street	3	6,807	2,269	-25%	9,509	3,170	-1%
11	Higham Hill	3	8,971	2,990	-2%	9,860	3,287	2%
12	Hoe Street	3	9,943	3,314	9%	10,355	3,452	7%

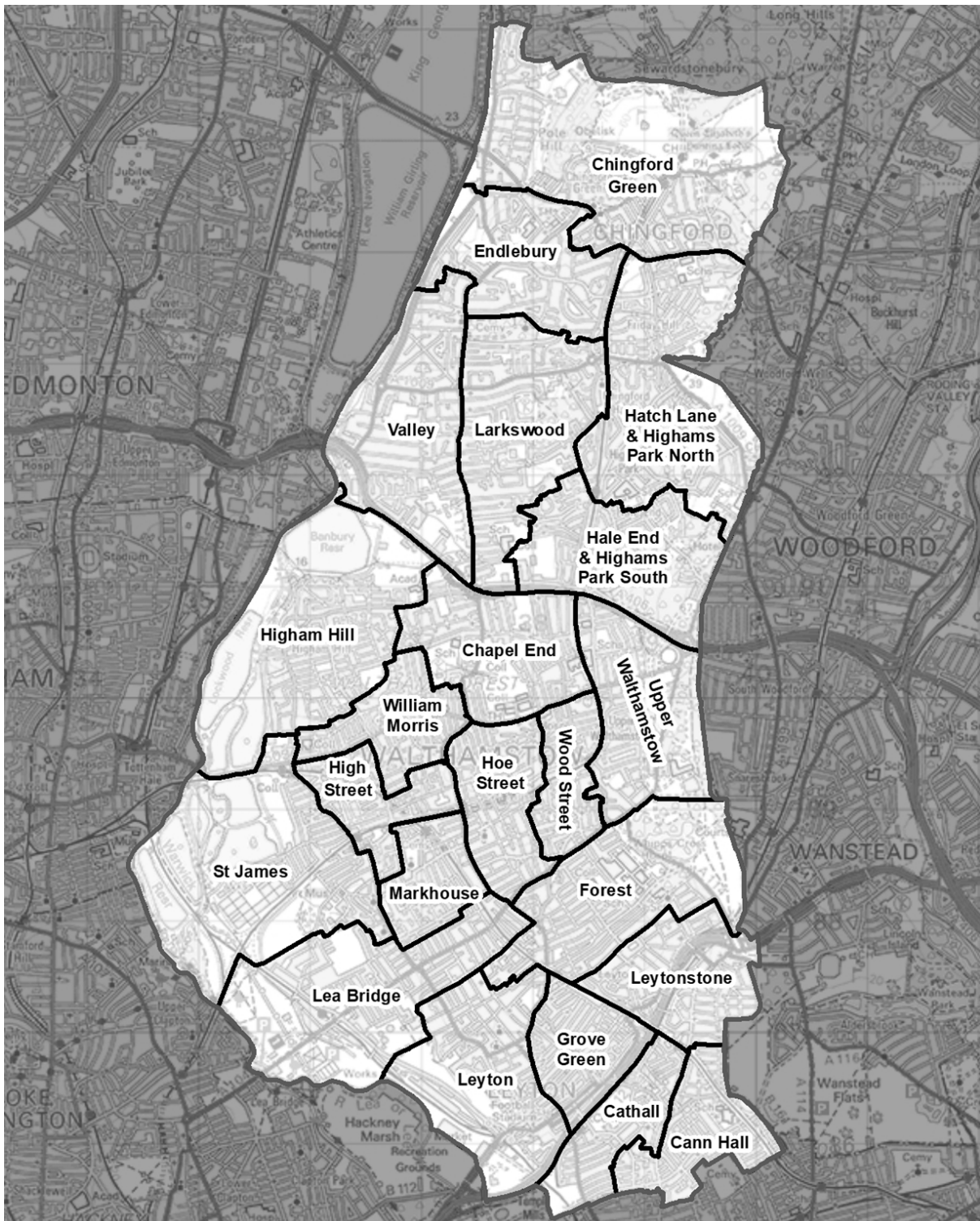
Ward name	Number of councillors	Electorate (2018)	Number of electors per councillor	Variance from average %	Electorate (2025)	Number of electors per councillor	Variance from average %
13 Larkwood	3	9,023	3,008	-1%	9,319	3,106	-3%
14 Lea Bridge	3	8,986	2,995	-1%	9,618	3,206	0%
15 Leyton	3	8,781	2,927	-4%	9,057	3,019	-6%
16 Leytonstone	3	8,848	2,949	-3%	9,271	3,090	-4%
17 Markhouse	2	5,929	2,965	-2%	6,151	3,076	-4%
18 St James	3	6,905	2,302	-24%	9,194	3,065	-5%
19 Upper Walthamstow	2	5,583	2,792	-8%	5,706	2,853	-11%
20 Valley	3	9,750	3,250	7%	9,936	3,312	3%
21 William Morris	3	9,437	3,146	4%	9,815	3,272	2%
22 Wood Street	2	6,086	3,042	0%	6,716	3,358	4%
Totals	60	182,195	–	–	193,060	–	–
Averages	–	–	3,037	–	–	3,218	–

Source: Electorate figures are based on information provided by Waltham Forest Council.

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

Appendix B

Outline map



A more detailed version of this map can be seen on the large map accompanying this report, or on our website: www.lgbce.org.uk/all-reviews/greater-london/greater-london/waltham-forest

Appendix C

Submissions received

All submissions received can also be viewed on our website at:

www.lgbce.org.uk/all-reviews/greater-london/greater-london/waltham-forest

Political Groups

- Chingford & Woodford Green Conservative Association
- Leyton & Wanstead Conservative Association
- Walthamstow Conservative Association
- Waltham Forest Council Conservative Group
- Waltham Forest Council Labour Group

Councillors

- Councillor Ahmad (Waltham Forest Council)
- Councillor Ali (Waltham Forest Council)
- Councillor Asghar (Waltham Forest Council)
- Councillor Ashworth te Velde (Waltham Forest Council)
- Councillor Baptiste (Waltham Forest Council)
- Councillor Bellamy (Waltham Forest Council)
- Councillor Berberi (Waltham Forest Council)
- Councillor Best (Waltham Forest Council)
- Councillor Coghill (Waltham Forest Council)
- Councillor Dore (Waltham Forest Council)
- Councillor Douglas (Waltham Forest Council)
- Councillor Edwards (Waltham Forest Council)
- Councillor Fitzgerald (Waltham Forest Council)
- Councillor Gray (Waltham Forest Council)
- Councillor Halebi (Waltham Forest Council)
- Councillor Hemsted (Waltham Forest Council)
- Councillor Ihenachor (Waltham Forest Council)
- Councillor James (Waltham Forest Council)
- Councillor Lacey-Holland (Waltham Forest Council)
- Councillor Limbajee (Waltham Forest Council)
- Councillor Littlejohn (Waltham Forest Council)
- Councillor Loakes (Waltham Forest Council)
- Councillor Mahmud (Waltham Forest Council)
- Councillor Miller (Waltham Forest Council)
- Councillor Mitchell (Waltham Forest Council)
- Councillor Moss (Waltham Forest Council)
- Councillor Osho (Waltham Forest Council)
- Councillor Pye (Waltham Forest Council)
- Councillor Rehman (Waltham Forest Council)

- Councillor Saumarez (Waltham Forest Council)
- Councillor Seesunkur (Waltham Forest Council)
- Councillor Strathern (Waltham Forest Council)
- Councillor Sweden (Waltham Forest Council)
- Councillor Terry (Waltham Forest Council)
- Councillor Williams (Waltham Forest Council)

Members of Parliament

- Sir Iain Duncan Smith MP (Chingford & Woodford Green)

Local Organisations

- Bushwood Area Residents' Association
- Friends of Lloyd Park
- Highams Park Planning Group
- Walthamstow Stadium Place Tenants' & Residents' Association
- Walthamstow Stadium Residents' Association

Local Residents

- 132 local residents

Appendix D

Glossary and abbreviations

Council size	The number of councillors elected to serve on a council
Electoral Change Order (or Order)	A legal document which implements changes to the electoral arrangements of a local authority
Division	A specific area of a county, defined for electoral, administrative and representational purposes. Eligible electors can vote in whichever division they are registered for the candidate or candidates they wish to represent them on the county council
Electoral fairness	When one elector's vote is worth the same as another's
Electoral inequality	Where there is a difference between the number of electors represented by a councillor and the average for the local authority
Electorate	People in the authority who are registered to vote in elections. For the purposes of this report, we refer specifically to the electorate for local government elections
Number of electors per councillor	The total number of electors in a local authority divided by the number of councillors
Over-represented	Where there are fewer electors per councillor in a ward or division than the average
Parish	A specific and defined area of land within a single local authority enclosed within a parish boundary. There are over 10,000 parishes in England, which provide the first tier of representation to their local residents

Parish council	A body elected by electors in the parish which serves and represents the area defined by the parish boundaries. See also 'Town council'
Parish (or town) council electoral arrangements	The total number of councillors on any one parish or town council; the number, names and boundaries of parish wards; and the number of councillors for each ward
Parish ward	A particular area of a parish, defined for electoral, administrative and representational purposes. Eligible electors vote in whichever parish ward they live for candidate or candidates they wish to represent them on the parish council
Town council	A parish council which has been given ceremonial 'town' status. More information on achieving such status can be found at www.nalc.gov.uk
Under-represented	Where there are more electors per councillor in a ward or division than the average
Variance (or electoral variance)	How far the number of electors per councillor in a ward or division varies in percentage terms from the average
Ward	A specific area of a district or borough, defined for electoral, administrative and representational purposes. Eligible electors can vote in whichever ward they are registered for the candidate or candidates they wish to represent them on the district or borough council

The Local Government Boundary Commission for England (LGBCE) was set up by Parliament, independent of Government and political parties. It is directly accountable to Parliament through a committee chaired by the Speaker of the House of Commons. It is responsible for conducting boundary, electoral and structural reviews of local government.

Local Government Boundary Commission for
England
c/o Cleardata
Innovation House
Coniston Court
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