

Bradford

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Comment text:

Dear all

Please find attached a submission sent on behalf of the Bradford District Labour Group for your current consultation that closes today.

Many thanks for your consideration,
Simon

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Attached Documents:

- boundary-commission-submission-bradford-labour-19aug24-final.docx

Bradford District Labour Group

**Submission to the Local Government
Boundary Commission for England (LGBCE)
consultation on its further draft
recommendations for the new electoral
arrangements in the areas of Baildon, Bingley
and Shipley and south of the city centre of
City of Bradford Metropolitan District
Council**

August 2024

Contents

Page 3 Introduction

Page 4 Our submission for Baildon, Bingley and Shipley

Page 7 Our submission for south of the city centre

Introduction

This submission is made by the Bradford District Labour Group to the Local Government Boundary Commission for England's (LGBCE) further draft recommendations published in June 2024.

We note that the further draft recommendations published in June 2024 relate solely to the areas of Baildon, Bingley and Shipley, and to the south of the city centre, as the Commission is satisfied that it has received sufficient evidence relating to the rest of the district.

This submission therefore focuses only on the areas of Baildon, Bingley and Shipley, and to the south of the city centre, having already made our representations clear for the whole district warding pattern in our earlier submission.

We reiterate the fundamental point that equalities is central to our decision making, with the work of councillors as important as ever in supporting their diverse local communities and driving forward Bradford Council's vision for a fairer and more prosperous district. Elected members have detailed knowledge and cultural understanding of their local neighbourhoods and any changes to wards therefore need to be proposed with care to support stronger more cohesive communities while ensuring electoral equality for those we serve.

In making this submission we remain dedicated to fulfilling the three statutory criteria which are:

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

Our submission for Baildon, Bingley and Shipley

The Baildon Town Council proposal, approved by the Commission in its further draft recommendations, would see the part of Baildon parish currently in Shipley ward placed into a Baildon ward. It proposes that Bingley parish be divided between Bingley East and Bingley West wards. Bingley East ward would be made up of most of the existing Bingley ward, but with the Bingley Central & Myrtle Park area moved into Bingley West ward. The remainder of the Bingley West ward would be composed of the parishes of Cullingworth, Harden and Wilsden, and part of the village of Cottingley, numbering around 485 electors on streets connected to Manor Drive. The remainder of Cottingley village would be included in Shipley ward. The boundary between Bingley East and West would follow the railway line for its entirety within Bingley parish.

We maintain that our previous proposal, which includes transferring part of Eldwick into the Baildon ward, better fulfils the Commission's three statutory criteria. We submit that it causes the least disruption to established community links and it best supports effective and convenient local government in this part of the district.

We contend that our previous proposal to add part of Eldwick to Baildon to create a Baildon & Eldwick ward is far less disruptive, with fewer negative impacts overall, than the revised proposals. We therefore now resubmit this proposal for the Baildon & Eldwick ward but with the refinement that the proposed boundary of the ward should be amended so that Southway, Moor Croft and Stone Hill would be included and Warren Lane would become the clear boundary between Baildon & Eldwick ward and Bingley ward.

To provide further detail, we submit that the proposal set out in the further draft recommendations, which divides Bingley into East and West, causes disproportionate damage to established community interests and identities, and causes undue detriment to effective and convenient local government, for the following reasons:

1) The new Baildon Town Council proposal would fracture community interests and identities.

The proposed change would draw a boundary straight through Bingley, a town that is unified by history, character and access to shared amenities and interests such as shops, parks, theatres and art centres. The proposed boundary ignores Bingley Town's historic identity and disregards the many local community groups that work within and cooperate across the town. The proposal would be akin to putting a boundary in the middle of Baildon high street separating a core community in two.

The Parish of Holy Trinity in Bingley and Gilstead would be split between the newly created wards. The History Society has reclaimed local artifacts from

Bingley Town Hall (which would sit in Bingley West) and moved them to their new venue in Damart (which would sit in Bingley East).

The residents of the proposed Bingley East Ward, for example, would not have elected representatives responsible for the amenities and services that they routinely access from their front door, such as Myrtle Park and Bingley Arts Centre, and that form part of the community they strongly identify with.

In addition to the division of Bingley town, the proposal also divides the village of Cottingley between two wards. This would result in the southern half of the village being in Shipley ward despite there being no community connection between this area and the urban area covered by Shipley. Cottingley has historically been a part of Bingley Rural ward along with the villages of Wilsden, Harden and Cullingworth and we believe that this is where the village should remain given that the transfer of the two Denholme wards to Worth Valley results in the ward meeting the requirement for equality of representation.

This proposal to change the boundary of Shipley ward to include part of Cottingley also involves transferring polling district 22A from Shipley to Baildon ward. This area has good, well established links with central Shipley going back to the post war era when local authority housing was built there to re-house people moved from poor quality housing in the town centre, which subsequently enabled re-development to take place.

22A also includes part of the Saltaire UNESCO World Heritage site and we maintain that dividing this important historical area between two wards would be an unnecessary detrimental change which was rightly rejected in the Commission's initial recommendations.

The proposed changes were submitted by a single Town Council in the Shipley Constituency understandably focused on its own boundary but with no reference to wider community consultation. It is a very ward-centric proposal seeking to reinstate its historic boundaries at the expense and disregard of wider historic boundaries, community interests and identities of three other local wards.

2) The new proposal would harm effective and convenient local government.

For example, ward councillors as a matter of custom and practice are the first to receive and have priority comment on grants or planning applications that would impact their ward. The Bradford Metropolitan District Council Constitution (part 4B, s10.1) specifically outlines the right of ward members to speak on planning applications: "All Council members have the right to make written comments on an application and attend meetings of the Committee and the Bradford, Shipley & Keighley Area Planning Panels. Ward members also have the right to speak.

Other members (subject to any issues concerning the need to declare an interest and not participate as discussed elsewhere in this Code) who have indicated that they wish to make representations on behalf of supporters or objectors may speak at the discretion of the chair and in line with procedures drawn up by the Strategic Director Place in consultation with the chair.” This means that under the new proposed arrangements, even if a planning application might readily impact the residents of either Bingley East or West, only the ward councillors for the area where the planning application was made would have a direct right to speak at planning panel as a result of the community they serve being fractured in two.

Since 1898, the villages bordering Bingley Town to the west have deliberately sought to ensure they were represented by elected officials advocating the interests of village communities, so their interests would not be overlooked by a town centric focus. The new proposal would undermine the historic and contemporary arguments that ensure the interests of the outer villages (Harden, Wilsden, Cullingworth and Cottingley) are represented by elected officials rooted and focused on village concerns rather than inner town interests. Likewise, the residents of Bingley Town have sought to ensure they are represented by elected officials that articulate and reflect the town’s specific interests within the wider district. These diverse sets of community interests are harmed by the new proposal.

Bingley Ward has a very clear geographical, social and community cohesion with current representation and BMDC organisation enabling its councillors to pick up and respond to local issues quickly and effectively and to support residents. The proposal to break that up and add barriers to residents’ local representation would be destructive of the town’s natural and successful community cohesion.

Our submission for south of the city centre

Whilst we appreciate the Commission's reasoning in relation to the M606 in its revised draft proposal, we believe that the result is sub-optimal in many respects and that the original draft proposal remains a better option because it more effectively fulfils the statutory criteria, for the reasons given below.

1) Detrimental to equality of representation

The revised draft produces council wards with significant variances in the number of electors, much more so than in the original draft recommendation. In particular the Bowling & Barkerend ward will be +10.2% at inception. The other affected wards in the South of Bradford are: Queensbury (-9%), Royds (-8%), Tong (+3%), Wibsey & Odsal (-7%) and Wyke (-10%). That compares unfavourably versus the original draft.

Ward	Variance (±%)	
	Original Draft	Revised Draft
Bowling & Barkerend	-7%	+10%
Queensbury	-1%	-9%
Royds	-5%	-8%
Tong	+5%	+3%
Wibsey & Odsal	-6%	-7%
Wyke	-7%	-10%

2) Detrimental to providing for effective and convenient local government

The revised draft proposal also departs from the new parliamentary constituency boundaries for Bradford East, South and West Constituencies. The original draft proposal departed only a little in respect of Bradford East/South at the border between Bowling & Barkerend and Tong. Whilst accepting that parliamentary boundaries are not material to the Commission's approach, it would be desirable and beneficial for both electoral administration and the operation of Bradford Council's devolved area committee structure to maintain these coterminous boundaries where possible. This would be conducive to achieving the statutory criterion of providing for effective and convenient local government.

3) Reflecting community interests and identities

We recognise that the M606 represents a significant physical boundary in respect of the originally proposed Wyke & Bierley Woods ward. There are, however, both road, footpath and cycling route connections wholly within the Bradford District that cross this boundary. Road access is via Staithgate Lane through the Euroway industrial estate (Staithgate Lane / Merrydale Road / Rockhill Lane) - as distinct from the Prologis Park - and is not signed as access only.

In its revised draft proposal the Commission notes that the community/settlement of Lower Woodlands has no direct connection to the Wyke area, with the most direct road connection being via the Junction of Bradford Road and Mill Carr Hill Road, which is outside the Bradford District. As the Commission rightly points out, however, Lower Woodlands' closest community connection is to Oakenshaw, that is itself split between two local government boundaries (Bradford and Kirklees), and not to any other settlement in Tong Ward. We suggest that this community connection to Oakenshaw makes the inclusion of Lower Woodlands within the originally proposed Wyke & Bierley Woods ward both viable and desirable.

In addition, it is not without precedent to have communities/settlements within a council ward, or local government boundary, that cannot be accessed by road without leaving the ward, or indeed council boundary. Local examples of this are: Tyersal Gate (eg BD4 0FG), the community to the north of Tyersal Lane. This settlement is within the Pudsey ward of Leeds City Council and cannot be accessed by road without leaving the Leeds City Council boundary. Similarly the community around Tyersal Terrace (BD4 8HP), also in Pudsey ward (Leeds). It is also the case that within the current Wyke ward it is not possible to access by road polling district 30A without leaving the Wyke ward. Finally, there are a number of dwellings in Lower Woodlands on Cliff Hollins Lane which are located in the Cleckheaton ward of Kirklees but cannot be accessed by road without leaving Kirklees.

Similarly, existing council wards within Bradford already span major highways (a 2+ dual carriageway): Little Horton (A641 – Manchester Road); Bowling & Barkerend (A650); and Craven Ward (A629) with limited crossings.

The narrative in the Commission's revised draft suggests limited community ties between the areas of Bierley and Wyke. This is accepted. It is not the case, however, that distinct communities cannot be part of the same council ward unless community ties exist. They can exist side by side as distinct communities. For example what are the community ties between Bierley and Tong village (Tong Ward) or between Low Moor (Polling District 21G) and Cooperville (Polling District 20E) that would become part of Royds ward under the revised proposals?

Overall, we believe that the original draft proposal for this area of Southeast and Southwest Bradford is a better solution than the revised draft. The original draft proposal has a more equal distribution of electors between wards, it is largely coterminous with parliamentary boundaries for simplicity of both electoral and council

administration, and it involves the least amount of significant change to the fewest existing and successful ward boundary arrangements.

Tong ward

Finally, with regard to the renaming of Tong ward to Tong Street. We believe that this is wholly inappropriate. We suggest that Holme Wood & Bierley would be a better name for a ward that predominantly comprises these two large settlements.