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From: [REDACTED]
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To: reviews
Subject: Review of Ward Boundaries - Telford & Wrekin
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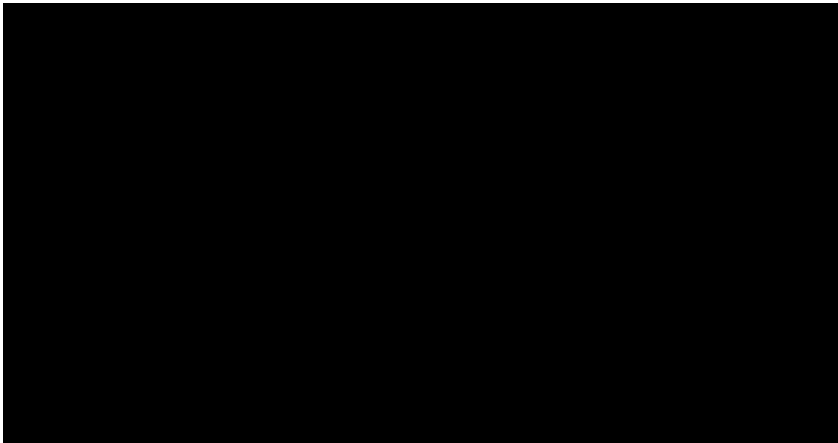
Importance: High

Categories: Submissions, [REDACTED]

Good afternoon

Please find attached letter from Cllr Shaun Davies, for your attention.

Kind regards



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Date: 9 May 2022

Dear Sirs

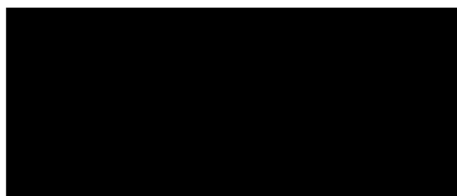
Review of Ward boundaries – Telford and Wrekin

Please find enclosed a copy of my submission in relation to the draft proposals published by you in December 2021.

I hope you find this submission useful but, if you require any further information, please do not hesitate to let me know.

I would like to thank you for your work to date and look forward to receiving your final recommendations in due course.

Yours faithfully



Cllr Shaun Davies

Leader – Telford & Wrekin Council
Councillor for Malinslee & Dawley Bank (Labour)
Chair of the Local Government Association Resources Board



I am writing in my capacity as Leader of the Council and as Leader of the Labour group within Telford and Wrekin Council, as well as a resident.

I have lived within the Borough, specifically within the Dawley, Malinslee and Dawley Bank area, for my entire life. As well as being a Borough Councillor, I am also a member of both Great Dawley Town Council and Lawley & Overdale Parish Council. Due to my work with the three Councils, I have a great deal of community knowledge and understand the issues affecting communities across the Borough. I have been a Town Councillor since 2007 and a Borough Councillor since 2011, becoming Leader of the Council in 2016.

I would like to make comment on the draft proposals published by the Local Government Boundary Commission for England ("the Commission") in respect of ward boundaries within the Borough of Telford and Wrekin. I have adopted the same approach as set out in the Commission's proposals by splitting the Borough of Telford and Wrekin into smaller areas.

1. Southern Telford & Wrekin

Ward name	Councillor No.	Variance 2027	Summary Response
Ironbridge Gorge	1	-4%	Agree
Madeley	2	-7%	Alternative proposal
Sutton Hill	1	9%	Alternative proposal
Woodside	2	-6%	Agree

Ironbridge Gorge and Woodside

I understand that the draft proposals put forward by the Commission were those proposed by Telford and Wrekin Council ("the Council") in its original submission. I would agree with those proposals and the reasons given for them in Council's original submission.

I also agree with the proposals to transfer a small number of properties from the Roberts Road area to Woodside – these properties are located in close proximity to the Woodside perimeter road and are geographically apart from the remainder of Ironbridge.

Madeley and Sutton Hill

I was somewhat surprised to read the proposals for Madeley and Sutton Hill put forward by the Commission. I believe there are compelling reasons for maintaining Madeley & Sutton Hill as one ward served by multiple members for the following reasons:-

The area of Sutton Hill is one of high deprivation. This typically means that residents living within this area are faced with a number of challenges, such as:-

- Housing quality issues;
- Fuel poverty;
- Financial challenges and access to benefits;
- Health challenges;
- Higher levels of anti-social behaviour, crime and disorder;
- Unemployment;
- Large households (often with an absent parent or parents);
- Multiple caring responsibilities;
- Lower educational attainment and higher educational special needs; and
- Houses of multiple occupancy

To reduce the number of elected members advocating for this community would be significantly detrimental to the residents living within that part of the current ward. Currently, they have 3 elected members that they can approach for support, each with their own skills, knowledge and abilities. By depriving residents within this community of having access to more ward members, their ability to seek support to navigate the many different frameworks that they need to access appropriate benefits and support, the proposals would have greatest impact upon those who have greatest need for extra care and support.

This, coupled with the traditionally low registration rates within the Ward mean that the current proposals will leave a large proportion of the community under-represented.

I note that, in the Conservative group's initial submission, reference has been made to areas of higher deprivation and the need for them to have greater representation. On this point, I agree with the Conservative group submission – the Commission's current proposals are contrary to this principle.

Residents in Sutton Hill benefit from investments made into the Madeley and Sutton Hill ward. For example, the Council has recently launched a Safer Stronger Communities which has resulted in investment, matched by the Police and Crime Commissioner into targeted areas within the Borough. By removing links between Madeley and Sutton Hill and, effectively, creating each of them as stand-alone neighbourhoods, the proposals are reducing the scope to share investment across the current, wider ward area.

There is a strong community identity within the current ward with historically strong links between the two communities. Many residents have been born in Madeley and Sutton Hill and have sought to live within the ward as they have grown up with families remaining living reasonably closely across the Ward. Whilst there are some amenities in Sutton Hill, the nearest larger supermarket is in Madeley with good transport links between the two, with around 4 buses every hour during the week. There are also good transport links using private vehicles.

Furthermore, the current Ward arrangement aligns with the Town Council arrangements. Madeley Town Council represents residents from both Madeley and Sutton Hill. Residents from Sutton Hill look to the Town Council for the provision of services. Introducing a separation between the two wards will simply serve to reinforce the perception that Sutton Hill has had its democratic representation reduced unnecessarily.

Whilst I recognise that the criteria that the Commission will take into account is based upon elector numbers, I do feel it necessary to raise the fact that Sutton Hill has a history of low electoral registration. I note that the Commission's proposals already place the planned Sutton Hill at +9%. Taking into account the additional residents within the Ward who are not accounted for within the registered electors, the true variance will be greater than this. As at 2020 figures alone, the over-18 population within Sutton Hill was around 3,100 which, as you can see, is already significantly higher than the Commission's projected 2027 electorate number of 2,975. This simply reinforces what I have said about the impact of under-representation in an area which already faces challenges.

Maintaining a larger ward represented by 3 members helps to address this by spreading the case work between those members.

2. Southern Telford

Ward Names	Councillor No.	Variance 2027	Summary Response
Brookside	1	2%	Alternative Proposal
Dawley & Aqueduct	3	5%	Alternative Proposal
Horsehay & Lightmoor	1	4%	Agree
The Nedge	3	10%	Alternative Proposal

Brookside and The Nedge

Having read the Council's original submission, I note that the proposal resulted in a ward which was at +13% variance. However, when the Commission undertook its site visit to Telford, I am sure it was noted that there is very little opportunity for any further development within this area. Whilst, in 2027, the proposals put forward by the Council would lead to a higher than ideal variance, the expected growth in other areas of the Borough would bring this ward into an optimum variance very soon thereafter. Furthermore, in order to accommodate an additional ward elsewhere in the Borough without making an alteration in Member numbers, it is inevitable that Member numbers need to be reduced elsewhere within the Borough to accommodate this change. This will have an impact upon electoral equality and optimum variance.

It is my firm belief that the Commission's proposals regarding Brookside will result in a number of disgruntled residents who identify with Brookside (and not other parts of South Telford provided for within the Commission's The Nedge ward).

I acknowledge that, geographically, the ring road provides a clear boundary. However, those living in the Lake End Drive area of the current ward consider themselves to be from Brookside. I have regularly undertaken canvassing in this area and am aware that electors in this area engage in democratic processes linked to Brookside.

I note the Commission's reference to the geography of the area and the perceived physical linkages with Holmer Lake and other parts of The Nedge. However, my view is that this is an overly simplistic view of the topography of the area. There are also pedestrian linkages with the remainder of the Council's proposed Brookside ward and, furthermore, the two main highways leading from the Lake

End Drive area exit onto the ring road, the name of this road is Brookside Avenue – to suggest that the properties serviced by the two roads that are only accessible from Brookside Avenue falls into anything but Brookside, is flawed reasoning. For road users, all entry points into Brookside lead from Brookside Avenue. Therefore, road users travelling from Lake End Drive to the rest of the Holmer Lake area would bypass natural routes leading to community facilities before reaching any facilities in the ward as proposed by the Commission.

Residents from the Lake End Drive area utilise, and are engaged with, the Brookside Community Centre which is located within a parade of shops. The local toddler's group operates from the Community Centre which is a short walk from Lake End Drive.

Furthermore, the properties around Lake End Drive are unusual in terms of their location. They are bounded on two sides by the hard border created by the A44 and on another by a school. To reach the Holmer Lake part of The Nedge, there is a significant degree of physical separation created by the school, some green space and the lake. On the other hand, there is physical connectivity and proximity between residential properties here and residential properties in Brookside.

The school located near Lake End Drive, although it is Holmer Lake Primary School, is attended by a high proportion of children from Brookside. The catchment area for this school covers approximately 80% of Brookside, with the properties north of Holmer Farm Road being on the outermost reaches of the catchment area. Conversely, Grange Park Primary School, located to the north of Holmer Farm Road serves all of the Holmer Lake area and Stirchley with Lake End Drive properties being on the absolute periphery of the catchment area for that school. The communities of Brookside and Holmer Lake are distinct, served by separate schools. The proposals put forward by the Commission will drive communities apart.

Whilst I accept the variance proposed in the Council's original submission is outside of the usual variances, I understand that there are times when the Commission can find there are exceptional circumstances to justify variances outside of the usual 10% and I truly believe that this is one of those circumstances.

Dawley & Aqueduct and Horsehay & Lightmoor

My concern regarding the Commission's proposals for these two wards relates to community identity and, in particular, the area around the Telford Steam Railway/Horsehay Steam Trust. I note

that the Commission's proposals currently include this are within the Dawley & Aqueduct Ward but I struggle to understand the rationale for this.

The train line closed in 1962 and the Steam Trust was originally formed in 1976 to ensure that the area's rail history was not forgotten. Notably, this trust was initially called the Telford Horsehay Steam Trust. The route runs from Horsehay at the south of the line to Lawley Village at the north end of the line.

The majority of housing within Dawley & Aqueduct comprises older housing, with the origins of Aqueduct Village being traced back as far as the early 1700s. In the 1820s, an ironmaster built some workers cottages which became known as Foster's Row. These houses are still in existence although now form part of the residential dwellings on Aqueduct Road. Further development took place near Foster's Row in 1860 and, again, those dwellings remain and now form part of Aqueduct Road. Similarly, Dawley can trace its routes back to the Domesday Book with some housing having a similar history to that in Aqueduct village. The houses in Horsehay, Lightmoor and Lawley are largely of a modern, 'new build' construction.

My alternative proposal would be for the area around Telford Steam Railway to be included within the Lawley ward. I will provide the reasons for this in my comments on Lawley.

3. Central Telford

Ward Names	Councillor No.	Variance 2027	Summary Response
Great Dawley & Dawley Bank	2	5	Alternative Proposal
Lawley	3	1%	Alternative Proposal
Overdale & The Rock	1	8%	Agree

Great Dawley & Dawley Bank

Whilst I recognise that the Council's original submission proposed a name change from Malinslee & Dawley Bank to Great Dawley & Dawley Bank, contact from residents has indicated that this is not supported and so I would advocate for this ward retaining its current name of Malinslee & Dawley Bank. I also understand the council proposal was when a larger 3 member ward was being proposed, given that this is not coming forward I would respectfully request the current name remains.

The Commission has also solicited comments in relation to the ward that the area around Telford Town Park should sit within. I am strongly opposed to the suggestion that this area could form part of Lawley. There are very well established pedestrian links between the Town Park and Malinslee & Dawley Bank – these do not exist to the same extent between the Park and Lawley. The majority of daily interactions with the Town Park for work or leisure purposes is from Malinslee and Dawley rather than Lawley.

Furthermore, a large area of the park has historic links with Malinslee and Dawley – many of the street names within Malinslee are taken from the names of old settlements that were in the town park. The Malinslee Chapel site sits within the Town Park. Finally, the Council's old office, which was situated adjacent to the Town Park was named Malinslee House. All of this demonstrates the wealth of links between the Town Park and Malinslee/Dawley and a lack of links between Lawley and the Town Park.

I would end by saying that, as the Commission has said, the impact of any change on electoral equality will be negligible. That being the case, I would question why a change would be made when it seems all it would achieve is voter confusion for those few electors residing in that area.

Lawley

Some of my comments in respect of Lawley have been explained under Dawley & Aqueduct above. However, I will expand on those comments.

As I have said, my view is that the area around Telford Steam Railway ought to be included within a Lawley ward. The steam railway area identifies as Horsehay, as can be seen by the name of the Trust when it was first established. As I have already said, the railway line runs from Horsehay to Lawley.

I have already mentioned the difference in the built environment between the areas. Although Lawley Village has a history, the major development within the Lawley area is of a new build dwellings; I am sure the Commission will have noticed this on their visit to Telford and Wrekin. This is in contrast to the older, historic housing within Dawley & Aqueduct.

Looking at an ordnance survey map of the area around Horsehay, Lightmoor, Lawley and Dawley & Aqueduct, it can be seen that Lawley Common and Horsehay Golf Club are almost one – this

demonstrates that the communities that have developed around these areas see ties between Horsehay and Lawley with no obvious connection to Dawley & Aqueduct.

There is a large retail area and several schools within Lawley which residents around the Telford Steam Railway gravitate to for the provision of their household and educational needs. There are good bus routes between the area around Telford Steam Railway/Spring Village and the retail centre in Lawley. Conversely, bus routes to reach shops in Dawley still require around a 10 minute walk from the nearest bus stops.

Further evidence of the links between Horsehay, Lawley and Lightmoor is the operation of the Bournville Village Trust. The Trust was established in 1900 by George Cadbury to provide affordable homes for communities. The Trust operates in Lawley and Horsehay & Lightmoor, not in Dawley. The Trust itself creates communities and provides funding to strengthen community ties and develop modern urban villages for families to live in. Again, this demonstrates the differences between these areas and Dawley & Aqueduct.

The primary reason for seeking this review was to provide representation for the communities of Lawley and Horsehay which have developed a strong community identity. The Commission's proposals lead to splitting those community in the interests of electoral equality but, in my view, this cannot be justified given the strength of community ties in the area.

I also understand that Council officers have had discussions with the Commission regarding projections in this area with queries being raised about the high projected numbers in 2027. Having spoken with officers in our Business Intelligence team, I understand that the census data obtained does not support the projections put forward by the Commission. Furthermore, I would say that the polling district to which these projections relate is largely built out and there is very little opportunity for substantial development in the future. Having spoken to our planning policy team, they also support this view and cannot identify what has driven the projections. These increased projections also mean that the electoral inequality attributed to the Council's original submissions seems to be overstated.

Overdale and The Rock

I do not have any comments on these proposals.

4. North Eastern Telford

Ward Names	Councillor No.	Variance 2027	Summary Response
Donnington	2	9%	Agree
Muxton	2	-6%	Agree
Priorslee	2	2%	Agree
St Georges	2	5%	Agree
Wrockwardine Wood & Trench	2	6%	Alternative Proposal

Donnington and Muxton

The Commission's proposals are broadly similar to those put forward by the Council in its original submission and, for that reason, I have no additional comment to make.

Priorslee and St Georges

I do not have any comments to make on the proposals in relation to these wards.

Wrockwardine Wood and Trench

I would like to suggest an alternative proposal for this ward. I am seriously concerned that the Commission's proposals do not properly reflect community identity in this area. I acknowledge that the A442 acts as a boundary but this area has hard boundaries surrounding it. Whilst I note the Commission's comments about the A442 appearing to be a harder physical boundary than the B4373, the reality is that, due to traffic at peak times, the B4373 is a more significant boundary than it might first appear.

I consider that the area of Wrockwardine Wood around Hollyhurst is one in which residents have strong ties to Oakengates in terms of retail and leisure offerings. There is a thriving community hub operated at The Wakes in the centre of Oakengates which residents from Wrockwardine Wood gravitate towards. Additionally, these residents have access to good travel links from Oakengates with the bus station and train station operating as a beginning/end point for residents from Hollyhurst.

5. North Central Telford

Ward Names	Councillor No.	Variance 2027	Summary Response
Apley Castle & Leegomery	2	-6%	Alternative Proposal
Hadley & Trench Lock	3	-9%	Alternative Proposal
Ketley	2	10%	Alternative Proposal
Oakengates	1	-8%	Alternative Proposal

Apley Castle & Leegomery

There is strong community opposition to the proposal to merge Apley Castle with Leegomery and I agree with that opposition. Apley Castle is an area of the Borough which has a strong, and distinct, community identity. I would suggest that the development of the Maxell site, which the Council originally proposed should be included in Shawbirch, form part of the Apley Castle ward with electors from the area around Berberis Drive being transferred into a Hadley & Leegomery ward. This should provide electoral equality whilst, at the same time, acknowledging and maintaining community identities.

There are very few linkages between Apley Castle and Leegomery with residents looking towards different retail centres, different schools and different communities.

The community within Apley Castle is formed around Apley Woods and the hospital with an extremely active Friends of Apley Woods Group which looks after the local conservation area. The Parish Council even has a representative from Apley Preservation Association – this clearly shows that residents of Apley Castle consider that they have a distinct identity that should be evidenced and supported. I am told by the Ward Member for Apley Castle that residents lobbied the Post Office to seek a change to their postal address so that they could formally include Apley Castle – they succeeded.

Leegomery's community identity is derived from the original estate development created by Telford Development Corporation. The demographics of each are also entirely distinct from each other. Residents of Leegomery, together with those in Hadley, look to the retail area of Hadley whilst residents in Apley Castle are drawn towards Shawbirch and Dothill. The majority of children within

Apley Castle attend Apley Woods Primary School whilst those in Leegomery typically attend Millbrook Primary School in Leegomery.

In terms of geography, the road leading from the A442 roundabout lends itself to a physical boundary between Apley Castle to the West and Leegomery/Hadley to the East. Furthermore, the road names in the area give an indication as to the location that they fall within; Leegate Avenue is the main road that services the original Leegomery estate whilst properties around Okehampton Road are accessed from Hadley Park Road which is found in Hadley, not Apley Castle.

To the same extent that Apley Castle and Leegomery do not form a single community or share a community identity, Hadley and Leegomery do share a community identity. They have common linkages including the community hub around the Leegate Centre and its own shopping centre called locally 'Hadley Shops'. The Parish Council is Hadley & Leegomery Parish Council reflecting the affinity between the two areas.

Hadley & Trench Lock

I have already commented on the commonality between Hadley & Leegomery above. If the Apley Castle proposals I have mentioned above are adopted then retaining the existing ward of Hadley & Leegomery with the addition of properties around Berberis Drive from Apley Castle would result in electoral equality if a 3 member ward was created. This reflects the longstanding ties, and shared community assets and amenities, between Hadley and Leegomery.

Ketley and Oakengates

There are grave concerns regarding the Commission's proposals to merge Ketley and Ketley Bank into one ward. There are no community links between these two communities despite the commonality in name. The areas are geographically distinct also. I note you have made reference to the Conservative group submission and state that you were persuaded of the community ties but, having reviewed their original submission, I see little mention of how Ketley and Ketley Bank form one distinct community.

There are greater public transport links between Ketley Bank and Oakengates than there are between Ketley and Ketley Bank. Those residing in Ketley Bank also look to Oakengates for community facilities and shops such as pharmacies, the community centre and leisure opportunities.

I understand that the engagement event held by the Council indicated that residents were strongly in favour of retaining a combined Oakengates and Ketley Bank ward due to the established links between the two.

I am also supportive of the suggestion that the Hollyhurst area of Wrockwardine Wood should be retained within the Oakengates and Ketley Bank ward – with good pedestrian routes between the two areas.

Without merging Ketley and Ketley Bank, the Commission's proposals result in an electorate which is too great to create a 1 member ward. To resolve that, it is proposed that electors living within the Millennium community area are moved into Oakengates and Ketley Bank so that the whole community is included in one ward. This will help to minimise elector confusion, something which the Town Council has previously commented on.

6. North Western Telford

Ward Names	Councillor No.	Variance 2027	Summary Response
Admaston & Bratton	1	-5%	Agree
Arleston & College	2	-2%	Agree
Ercall	1	-10%	Agree
Haygate & Park	2	2%	Agree
Shawbirch & Dothill	2	-9%	Agree

I am supportive of all of the proposals relating to North Western Telford.

7. Rural Western

Ward Names	Councillor No.	Variance 2027	Summary Response
Ercall Magna	1	7%	Agree
Little Wenlock & Wrockwardine	1	-8%	Agree

I am supportive of all of the proposals in this regard.

8. Rural Eastern & Newport

Ward Names	Councillor No.	Variance 2027	Summary Response
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Church Aston & Lilleshall	1	-1%	Agree
Edgmond	1	-9%	Agree
Newport East	1	-2%	Agree
Newport North	1	-2%	Agree
Newport South	1	-8%	Agree
Newport West	1	2%	Agree

I am supportive of these proposals; on the whole they provide for good electoral equality.

In relation to Newport particularly, the division of these Wards enables residents to have the differences in the communities properly represented with the more rural areas being removed from the more urban areas.