Response to the LGBCE Draft Recommendations, February 2022

7 April 2022

Introduction

1. This is my response to "New Electoral Arrangements for Brighton & Hove – Draft Recommendations February 2022" (henceforth, the "draft recommendations" or the "report"), published 1 February 2022 by the Local Government Boundary Commission for England (henceforth, the "LGBCE" or the "commissioners").

2. I was born in Hollingdean, Brighton and have lived locally for almost 80% of my life. With a large extended family across Brighton and Hove, I am particularly familiar with and interested in the Hollingdean, Hollingbury, Carden, Brunswick, Preston, Varndean, Withdean and Westdene neighbourhoods. My response focusses on the wards containing these areas.

3. I do not believe that the commissioners' draft recommendations have found the best solutions to apply the LGBCE's overriding principles; ie, community identity, electoral equality and effective and convenient local government – the legal factors the Boundary Commission seeks to observe in drawing new ward boundaries.

4. Next, I make some general comments on the application of the LGBCE's overriding principles. Then, I make specific comments on the commissioners' draft recommendations, including my own proposals for alternative boundaries and warding arrangements for certain of the local government wards covered by the report. My response is structured as follows:

   A. Brighton <u>and</u> Hove – Community identity
   B. Local topography and public transport – Community links
   C. Effective and Convenient Local Government
   D. Electoral Equality
   E. Westdene and Hove Park
   F. Patcham and Hollingbury
   G. Fiveways
   H. Preston Park
   I. Regency
   J. Hanover and Elm Grove

5. For clarity I have used the ward names recommended by the commissioners. However, my comments include proposals for names which I believe would be both more appropriate to the areas concerned and more effective in achieving the commissioners' aims.

A. Brighton and Hove – Community identity

6. The historic town boundary between Brighton and Hove is wrongly disregarded by the LGBCE's February 2022 draft recommendations, with particularly heinous consequences for the commissioners' recommended new wards prospectively named "Westdene and Hove Park" and "Regency".

7. There has been regular confusion since the 1997 formation of the unitary authority Brighton and Hove Borough Council, and its elevation to a City Council in 2001. The naming of the City of Brighton and Hove has caused external misunderstanding and led to the existence of two diverse towns (within the one local government area) being overlooked regularly by people who are unfamiliar with either Brighton or Hove. Local residents, however, are only too aware of whether we are from the town of Brighton, or the separate town of Hove; as we are of the major differences between the two towns. The town boundary is well observed, as well as historic, and the expression "Hove actually" remains in frequent use.

8. The LGBCE's February 2022 draft recommendations for the two wards of Westdene and Hove Park, and Regency, ignore the historic boundary between the two towns of Brighton and Hove. This is unacceptable to local residents and must be rectified. The commissioners must ensure that their final recommendations produce local government wards which observe the historic boundary between the towns of Brighton and Hove. In my specific comments below, I suggest alternative boundaries for wards which do observe the historic town boundary between Brighton and Hove.

B. Local topography and public transport – Community links

9. Brighton is a very hilly town. Its development was driven by this topography and the underground rivers which regularly flooded the area before modern sewerage systems were in place. This has led to the majority of transport routes being north/south from neighbourhoods in and out of the town centre.

10. Other than the seafront (Kings Road), there are few cross routes running between Brighton and Hove or Portslade. This reflects the development of the road system around the (now hidden) riverways, with Dyke Road, London Road, Ditchling Road and Lewes Road providing the main routes; all north/south. Local public transport reflects this, with bus and train services rarely crossing wards east/west but usually orientating in and out of the town centre. The few routes which do cross from Brighton to Hove are far from direct or deliberate, but have arisen out of cumulative service amalgamations. (These may be viewed as phoenix or Frankenstein routes, depending on choice.)

11. It is understandable that the commissioners did not visit the local area due to the pandemic. Unfortunately, this has also resulted in some recommended ward boundaries which ignore local topography, are oblivious to local public transport routes (or the lack thereof), and either divide established communities, or attempt to weld together areas where there are no significant pre-existing shared links.

12. Final recommendations cannot be made by the commissioners without first-hand knowledge of the local topography which has driven the development of recognised local boundaries, transport routes and community networks. These points are relevant to the alternative boundaries I suggest.

C. Effective and Convenient Local Government

13. At Appendix A of their report, the commissioners have accepted that the number of local electors per councillor is projected to rise from 3,849 in 2021 to 4,267 electors per councillor by 2027. This equates to an increase of 418 electors per councillor by just four years after this boundary review is due to complete.

14. The report does not explain how such a large increase (10.86%) in the number of electors each councillor is expected to represent, can contribute to effective and convenient local government. In any sphere of life, one would expect a 10.86% surge in participants to cause significant strain without any corresponding increase in resources. In particular, councillors who represent wards with high deprivation indices, often linked to health inequalities or housing issues, could anticipate a significant rise in constituents requiring assistance.

15. With councillors already overworked and often unable to respond either fully or promptly to electors' concerns, this projected increase in the number of electors in such a short time frame suggests that – for councillors to remain effective in representing and responding to electors, and for both councillors and the council to be convenient for electors to access – the LGBCE should be increasing the number of councillors to be elected onto Brighton and Hove City Council by five or six. This number is indicated by the following calculations:

    a) If councillors currently represent 3,849 electors each and the number of total electors is projected by 2027 to increase by 22,555, the number of councillors to be elected onto Brighton and Hove City Council should be increased by six (22,555 / 3,849 = 5.86).

b) Applying the projected 2027 figure of 4,267 electors per councillor suggests that a minimum of five councillors should be added to the total number elected onto Brighton and Hove City Council (22,555 / 4,267 = 5.26).

16. The report states at parts 17-18, that the commissioners wrote to Brighton and Hove City Council to ask its views on the appropriate number of councillors for Brighton and Hove and that this was "decided" before the initial public consultation. This report is the first time I have seen any electoral data sourced from Brighton and Hove City Council. As part of the consideration of their final recommendations, I maintain that the commissioners must consider all submissions from local residents on the number of councillors who will represent us.

17. I ask the commissioners also to be mindful of the coincidental timing of the ongoing parliamentary boundary review, where significant ward changes are under consideration. I believe this has been a major cause of confusion and led many electors in Brighton and Hove to believe wrongly that they either had responded to the LGBCE, or did not need to submit a separate consultation response, in the second half of 2021.

D. Electoral Equality

18. At part 166 of its report, the LGBCE acknowledges that the Boundary Commission has an obligation to comply with the Equality Act 2010. The report states that the Boundary Commission "is sufficiently satisfied that no adverse equality impacts will arise as a result of the outcome of the review".

19. However, it appears to me that in making their draft recommendations, the commissioners have failed to consider at least one impact on councillors and prospective council candidates with protected characteristics. I think the increased burden on each councillor of representing an additional 418 electors (as discussed at section C), is so significant that it would deter some people with protected characteristics and, in particular, disabled people and single parents, from seeking election or re-election. Given this, I think the failure to recommend an increase in the number of councillors elected to Brighton and Hove City Council amounts to indirect discrimination under the Equality Act 2010.

20. Accordingly, I conclude this to be in breach of the wider interpretation of the Commission's electoral equality principle, as well as inconsistent with the Equality Act 2010 and the presumed obligation on the Boundary Commission not to act contrary to the health and wellbeing of public representatives. I urge the commissioners to reconsider the total number of councillors required to represent electors across Brighton and Hove.

E. Westdene and Hove Park

21. The report includes the ward of Westdene and Hove Park within its "North Hove" section. The commissioners should be aware that this is highly insulting, infuriating (given submissions to the concurrent parliamentary boundary consultation) and a cause of considerable alarm to residents of Westdene – who live in Brighton and are Brightonians.

22. Dyke Road, Dyke Road Avenue and Devils Dyke Road (to the edge of the towns) run along the historic town boundary between Brighton and Hove. Westdene and all parts of the recommended ward to the east of this boundary are in Brighton and are not part of Hove. Electors have never thought of themselves as anything but Brightonians and do not associate themselves with "north Hove". Anybody who suggests otherwise is seeking to foist their own agenda on the LGBCE.

23. This recommended new ward infringes the overriding principles the Boundary Commission is supposed to apply:

    a) It crosses the historic town boundary between Brighton and Hove.

    b) Dyke Road Avenue (like Dyke Road and Devils Dyke Road) is an exceptionally busy traffic route in and out of Brighton. It represents a major traffic barrier which is impossible to safely navigate on foot other than at the few, distant, light-controlled crossing points. Even then, these are risky crossing points for pedestrians as motorists regularly fail to observe the red light. I suggest that the commissioners try taking the 27 bus north (on the Hove side) during peak hours, either get off a stop early or go a stop too far and then try to make their way back to where they want to be on the Brighton side. This may bring home to them how distant the two sides of the road are in real life.

    c) There are no direct public transport routes which go east to west from the existing neighbourhoods of Westdene to Hove Park. Only the 27 bus route serves Westdene. That goes into Brighton town centre and then out to Saltdean, East Brighton – in the very opposite direction.

    d) The clearest indication of the lack of any community links between Westdene and Hove Park is reflected in the actions of Westdene parents when choosing their children's schools. Westdene parents have routinely appealed when their children have been allocated places at either the Blatchington Mill or Hove Park schools (wholly or partly inside the recommended new ward), with which Westdene families feel no connection and have great difficulty travelling to. Electors are concerned that, if the commissioners' draft recommendations for this ward are confirmed by the commissioners' final recommendations, it will unfairly

weight the allocation of school places against their children, who Westdene parents have consistently preferred to send to Brighton's Dorothy Stringer or Varndean High Schools, which their children can walk to easily in under half an hour.

e) Geographically, the recommended ward is a behemoth. It is impossible to see how it could promote effective and convenient local government. How could the whole ward be effectively or conveniently represented by the same group of three councillors? What local government concerns might residents living nearby the Goldstone Retail Park, Aldrington Halt or the Hove Tip share effectively or conveniently with residents of Green Ridge or anywhere along the Westdene edge of the South Downs National Park?

24. In summary, this recommended new ward does not represent one cohesive community but two separate communities forced together. I urge the commissioners to reconsider.

25. **Ward representation –** as the report's recommendations do not contain any one councillor wards, it appears the commissioners would not approve a one councillor solution for Westdene (reinstating the Brighton / Hove town boundary along Dyke Road Avenue as the ward's western boundary and moving the recommended southern boundary so that such a ward would include all of Dyke Road Place, The Beeches, Hazeldene Meads, Withdean Road, and Withdean Avenue). Consequently, while I propose that a two councillor Hove Park ward remains, I do not intend to comment on that ward. (Hove Park is currently a two member ward and, in my scenario, it might only need some adjustments on its southern boundaries, depending on the commissioners' final recommendations for its neighbouring wards in Hove.)

26. Accordingly, my solution is to propose two alternative wards wholly within Brighton, electing two councillors each. I suggest these proposed wards will have greater local cohesion and meaning for electors, as well as producing more effective and convenient local government for electors, our representatives and the Council. These would be the wards of:

- Westdene and Patcham (detailed in this section)
- Hollingbury and Carden (discussed in section F, below).

27. My proposed ward boundaries would also make small changes to the commissioners' draft recommendations for the boundaries of the wards named in the report as Fiveways and Preston Park. I discuss those wards in greater detail in sections G (Fiveways) and H (Preston Park) below.

Alternative proposal of Westdene and Patcham ward

28. I propose a two councillor ward encompassing the two adjoining neighbourhoods of Westdene and Patcham. The linking up of these two areas' Local Action Teams over the last five years, the development of the Withdean and Patcham Network and the issue of the Withdean and Patcham Newsletter (both using the existing local government ward name of Withdean but representing a Westdene base), reflects the growing unity between local community groups across these existing wards. In particular, the Westdene, Brangwyn and Patcham areas have increasingly common interests, similar housing and neighbourhoods adjoining the South Downs.

29. Accordingly, I propose the following boundaries for the ward of Westdene and Patcham:

a) Observe the Brighton / Hove town boundary along Dyke Road Avenue as the ward's western boundary, starting from the junction with Withdean Avenue and also including all of Dyke Road Place, The Beeches, Hazeldene Meads and Withdean Road (streets within Preston Park ward in the commissioners' recommendations). This boundary would then follow the existing boundary of Withdean ward up to the town boundary in the north, continuing along the existing Patcham ward boundary.

b) As there are no residences on the north side of Peacock Lane, this road is a natural boundary. The Westdene and Patcham ward's southern boundary would run west down the centre of Peacock Lane, turn south along the A23 to the junction with Tongdean Lane, west up the centre of Tongdean Lane to the boundary recommended by the commissioners at the railway line, then be modified from the draft recommendations to include the roads listed at (a) above.

c) The eastern boundary of the proposed Westdene and Patcham ward would run north along the centre of Braybon Avenue and Warmdene Road, so the west sides of those streets would fall within my proposed ward. From the northern end of Warmdene Road, at the junction with Ladies Mile Road, this boundary would head west along the centre of Ladies Mile Road to the intersection with Vale Avenue and Mackie Avenue. (This area which the commissioners may see on a map as a triangle, is commonly known locally as the Clock Tower.) The boundary should be extended north through the recreation ground. Vale Avenue and streets to the west would fall inside the Westdene and Patcham ward. (NB: Barrhill Avenue would be the first street outside this ward's boundary, thus in the new ward I propose of Hollingbury and Carden – see section F, below.) This boundary would then continue until it meets the existing northern town boundary of Brighton.

d) The northern boundary of the proposed Westdene and Patcham ward would follow Brighton's existing northern town boundary in the relevant areas.

30. I believe these suggested boundaries will produce a Westdene and Patcham ward having much greater local cohesion and meaning for electors than the draft recommendation of a Westdene and Hove Park ward, and which will result in more effective and convenient local government. I urge the commissioners to adopt these changes in their final recommendations.

F. Patcham and Hollingbury

31. My **alternative proposal** is for two wards of two councillors, named:

- Hollingbury and Carden (detailed in this section)
- Westdene and Patcham (discussed in section E, above)

32. Hollingbury is situated on the top of one of the hills overlooking Brighton and its neolithic fort is the earliest known settlement in the entire area. At the western bottom of that hill is Patcham Village and in between lies Carden. Not only do electors in Patcham have more in common with their immediate neighbours to the west in Withdean (as discussed at section E, above), than to the east in Carden; but, for effective and convenient government, an administrative dividing line must pair Hollingbury with Carden. Hence my proposed alternative ward and suggested name.

33. My suggested alternative **name** of Hollingbury and Carden for this ward recognises an ancient highlight of our area (the settlement at Hollingbury having been recorded on maps long before one at Brighton), as well as two communities in Hollingbury and Carden, which have been among the most deprived in Brighton in modern times. I think this name will be important in encouraging people living in these two communities to identify with the new ward and participate in the democratic process.

Alternative proposal of Hollingbury and Carden ward

34. I propose the following boundaries for the ward of Hollingbury and Carden:

a) A southern boundary running east-west along upper Surrenden Road between Ditchling Road and Braybon Avenue. This boundary would run along the south side of the road so that all properties in this upper part of Surrenden Road are within the new Hollingbury and Carden ward.

b) From the junction of Ditchling Road and Surrenden Road, the ward's eastern boundary would follow Ditchling Road north to the A27 and on to meet Brighton's existing northern town boundary.

c) In the west, the ward's boundary would mirror the eastern boundary of the proposed Westdene and Patcham ward (discussed at section E, above). The western boundary of the ward would run north /south along the centre of Braybon Avenue and Warmdene Road, so that the east sides of those streets would fall within the proposed Hollingbury and Carden ward. From the northern end of Warmdene Road, at the junction with Ladies Mile Road, this western boundary would head west along the centre of Ladies Mile Road to the intersection with Vale Avenue and Mackie Avenue. (This area which the commissioners may see on a map as a triangle, is commonly known locally as the Clock Tower.) The boundary should be extended north through the recreation ground. Barrhill Avenue and streets to the east would fall inside the Hollingbury and Carden ward. (NB: Vale Avenue would be the first street outside the ward's boundary, thus in the new ward I propose of Westdene and Patcham.) This boundary would then continue until it meets Brighton's existing northern town boundary.

d) The northern boundary of the proposed Hollingbury and Carden ward would follow Brighton's existing northern town boundary in the relevant area.

35. I believe these suggested boundaries will produce a Hollingbury and Carden ward having greater local cohesion and meaning for electors than the recommended Patcham and Hollingbury ward, and which will result in more effective and convenient local government. I urge the commissioners to adopt these changes in their final recommendations.

G. Fiveways

36. The recommended **name** for this ward ignores the entire Hollingdean community, which is a major Brighton community. I urge the commissioners to correct this major omission by amending the recommended ward name to **Hollingdean and Fiveways**. I think this order is important to emphasise the continuity of this ward with the predecessor Hollingdean and Stanmer ward, as well as to encourage people living in Hollingdean to identify with the new ward and participate in the democratic process.

37. The Lewes Road (A270) is one of Brighton's principal routes and is particularly busy in the area of Brighton immediately to the east of the recommended ward, where it takes on the characteristics of a dual carriageway, with one of Brighton's largest, busiest, most complicated and

dangerous traffic intersections (the “gyratory” at the junctions with Bear Road, Hollingdean Road and Upper Lewes Road), as well as major bus stops which cater for multiple services including frequent bus expresses - the long, flexible buses (“bendibuses”) to the universities, a bus station and bus garage. By contrast, the nearby raised rail line is a local branch line with infrequent, minor services. It allows for easy crossing, and does not impede community links.

38. Lewes Road is the established boundary between the current Hollingdean and Stanmer ward (which the recommended Fiveways ward partly replaces) on the west and Moulsecoomb and Bevendean ward on the east. In recommending that this ward boundary move further west to the rail line, the commissioners have taken an already deprived part of Brighton (known locally as Saunders Park), and cut it off from its community in Hollingdean. The difficulty of crossing the Lewes Road in this location, means there are minimal links between the different sides of the road. Residents of Saunders Park have established links to the west rather than the east. The boundary should be maintained as the Lewes Road, and not moved to the railway track.

39. Brighton’s Cityclean refuse depot and recycling centre is a major employer in Hollingdean, and has experienced a series of well-publicised industrial disputes in recent years. By following the east/west part of Hollingdean Lane, the draft recommended boundaries split the depot site in two. Given the militancy of the depot’s workforce, I believe that effective and convenient local government demands clear lines of councillor responsibility for the depot and its workforce. I cannot reconcile this with splitting the site across two wards, with five councillors potentially having different mandates. I believe that effective local government will be served by retaining the current ward boundary at this point, so that from the gyratory junction (Lewes Road/Hollingdean Road/Bear Road), the ward boundary follows the railway line until it meets the Ditchling Road. Or, if the commissioners are now concerned that Downs Infant and Junior Schools should be in the same ward, then the boundary could be moved so that it follows the rail line south and loops around the whole Cityclean depot by following the north/south part of Hollingdean Lane back to the junction with Florence Place.

40. At part 77 the report mentions the Friar Road estate. Known locally as “the Friars”, the streets named Friar Road, Friar Crescent, Friar Close, Friar Walk, Hollingbury Copse and Surrenden Park, are rightly linked to the recommended ward covering the Fiveways neighbourhood. The Friars are adrift from the immediately neighbouring Hollingbury community due to the pattern of local streets, the topography of the area and how local commerce has developed. For Friars residents, all roads lead to Fiveways, this is the community they associate with and is the ward they should be within. So,

the boundary of this ward should run around the Friars to include these streets. However, as noted at section F above, this is not true of upper Surrenden Road, which faces into Hollingbury and should be included within the Hollingbury and Carden ward as I propose (particularly as upper Surrenden Road is a very wide street and almost all its residences are on its north side).

41. The network of streets west of Balfour Road as far as Surrenden Road form part of the community around Preston Park, not Fiveways. This has been reflected recently in neighbourhood petitions, parking and other consultations conducted by the Council, plus local topography which the commissioners may be unaware of absent a visit. The local street pattern, emphasised by the pronounced dip immediately below Balfour Road, means that residents of this neighbourhood frequent the shops, hospitality and medical facilities at the Balfour Road/Preston Drove junction or at Preston Village at the bottom of Preston Drove. Residents of this area do not choose to hike up to Fiveways at the top of Preston Drove. They play sports and enjoy leisure activities in adjacent Preston Park, not Hollingbury Park and rarely even Blakers Park. Including these electors in the Fiveways ward as per the commissioners' draft recommendations, is not a good fit with the community links, interests and lifestyles of electors living in this area.

42. Accordingly, I suggest that the Fiveways (or Hollingdean and Fiveways) ward boundary should proceed down the centre of Balfour Road, with the eastern side of Balfour Road and roads to the east in the Fiveways (or my proposed Hollingdean and Fiveways) ward. The western side of Balfour Road and the roads to the west, including Bates Road, Loder Road, Gordon Road, Herbert Road, Loder Place, the school campus, lower Surrenden Road (south of the junction with Peacock Lane/Braybon Avenue to Preston Drove), and the roads off the east side of lower Surrenden Road (Draxmont Way, Mulberry Close, Stringer Way, Varndean Holt, Surrenden Holt, Whittinghame Gardens, and Poplar Close) belong in the recommended Preston Park (or my proposed Preston, Stanford and Varndean) ward. (See section H below for details of my proposed Preston, Stanford and Varndean ward.)

Alternative proposals for Hollingdean and Fiveways ward

43. In summary, the boundaries I suggest to produce a ward having greater local cohesion and meaning for electors in Hollingdean and Fiveways (and neighbouring wards), are as follows:

a) An eastern boundary following the Lewes Road as far south as the gyratory and only then moving to the railway line.

b) Ensuring the whole Cityclean depot site is within this ward, either by following the railway line up to Ditchling Road or by adjusting the boundary around the entire site rather than cutting it in two.

c) Including "the Friars" within this ward; ie, the streets named Friar Road, Friar Crescent, Friar Close, Friar Walk, Hollingbury Copse and Surrenden Park.

d) Moving the boundary with the recommended Preston Park ward to the centre of Balfour Road, so that the neighbourhood from the western side of Balfour Road to Surrenden Road is included in that Preston Park ward, with which residents of that area have much greater affinity and community of interests. This encompasses the streets of Bates Road, Loder Road, Gordon Road, Herbert Road, Loder Place, lower Surrenden Road (south of the junction with Peacock Lane/Braybon Avenue to Preston Drove), Draxmont Way, Mulberry Close, Stringer Way, Varndean Holt, Surrenden Holt, Whittinghame Gardens, Poplar Close. This would also include the school campus as effective and convenient local government will be best served by keeping the school campus all in one ward.

44. I believe these suggested boundaries will produce a Hollingdean and Fiveways ward having greater local cohesion and meaning for electors than the recommended Fiveways ward, and which will result in more effective and convenient local government. I urge the commissioners to adopt these changes in their final recommendations.

H. Preston Park

45. It is welcome that this recommended ward observes the Brighton / Hove town boundary.

46. The suggested **name** of this ward will confuse many electors, as it recycles the name of an existing ward but with very different ward boundaries. This will cause a loss of identification with local councillors, both for people who will no longer be within the new ward's boundaries and for electors newly within the recommended Preston Park ward. I believe that keeping this name will impede effective and convenient local government.

47. Given the area of the ward, I urge the commissioners to change the name of this recommended ward to **Preston, Stanford and Varndean**. This name recognises both historic links and the three significant communities the draft recommended ward brings together. This name will make the ward easy for electors to recognise and identify with. Also, given the propensity

of Brightonians to shorten and abbreviate names, this name will not be the mouthful some commissioners might fear (or, perhaps there are no fears, given the draft recommendation for a "Seven Dials, St Peter's and North Laine" ward). It will quickly become "PSV" and will likely be known to many as "Eindhoven", with an affectionate regard for the commissioners who facilitated this.

48. It is most shocking that the commissioners' draft recommendation for this ward literally splits the Varndean neighbourhood in two, by drawing the recommended ward boundary down the centre of Surrenden Road. This ignores Varndean community groups and networks, which have been active and growing over recent years; eg, with demands for action on bus services, grass verges, parking meters, parking restrictions, tree preservation, litter, gritting, street sweeping, school fields and much else besides. Council consultations have recognised both sides of Surrenden Road developing as one cohesive community. Effective and convenient local government will not be served by splitting our community in two. Anybody arguing otherwise has their own agenda.

49. Perched as we are on a very steep hill, Varndean residents use our local amenities (with shops, leisure and medical services immediately nearby both Preston Park and Preston Village) rather than hike up to Fiveways. The visible dip immediately below Balfour Road reinforces this disjoint. The western side of Balfour Road and all roads down to and including the eastern side of Surrenden Road, should all be kept together with the western side of Surrenden Road and the streets coming off to the west. Specifically, Bates Road, Loder Road, Gordon Road, Herbert Road, Loder Place, the school campus, both sides of lower Surrenden Road (south of the junction with Peacock Lane/Braybon Avenue to Preston Drove), Draxmont Way, Mulberry Close, Stringer Way, Varndean Holt, Surrenden Holt, Whittinghame Gardens and Poplar Close, should all be included within the recommended boundaries of Preston Park (or, as I propose, "Preston, Stanford and Varndean") ward.

Alternative proposal of Preston, Stanford and Varndean ward

50. Accordingly, as well as the suggested name change, I propose three adjustments to the boundaries of the commissioners' recommended ward of Preston Park, to form my proposed alternative ward of Preston, Stanford and Varndean:

a) As discussed in section E above, move the boundary with the commissioners' recommended Westdene and Hove Park ward (or, as I propose, a Westdene and Patcham ward) so that Dyke Road Place, The Beeches, Hazeldene Meads, Withdean Road, Withdean Avenue and

Dyke Road Avenue (from the junction with Dyke Road Place up and including the junction with Withdean Avenue) are moved into the recommended Westdene and Hove Park (or my proposed Westdene and Patcham) ward.

b) Also as outlined at section E, the northern boundary of this ward with the draft recommended Westdene and Hove Park ward (or my proposed Westdene and Patcham ward) should run along the centre of Peacock Lane, turn south along the A23 to the junction with Tongdean Lane, west up the centre of Tongdean Lane to the boundary proposed by the commissioners at the railway line, then cut across the railway line heading west to meet Dyke Road Avenue north of Tivoli Crescent North (so, included within this ward), but south of Withdean Avenue (included in the Westdene and Hove Park, or my proposed Westdene and Patcham, ward, as detailed at (a) above).

c) As discussed above and at section G, the eastern boundary of this ward should run along the centre of Balfour Road; to include the western side of Balfour Road plus Bates Road, Loder Road, Gordon Road, Herbert Road, Loder Place, the school campus, both sides of lower Surrenden Road (south of the junction with Peacock Lane/Braybon Avenue to Preston Drove), Draxmont Way, Mulberry Close, Stringer Way, Varndean Holt, Surrenden Holt, Whittinghame Gardens and Poplar Close, within this new ward.

51. I believe these suggested boundaries will produce a Preston, Stanford and Varndean ward having greater local cohesion and meaning for electors than the draft recommended Preston Park ward, and which will result in more effective and convenient local government. I urge the commissioners to adopt these changes in their final recommendations.

I. Regency

52. I refer the commissioners to my comments at section A and implore them to withdraw all recommendations where boundaries cross the historic Brighton / Hove town boundary.

53. I can find no compelling reason based on the overriding principles of community identity, effective and convenient local government, and elector equality for the commissioners having recommended the loss of the Brunswick and Adelaide ward – a local government ward representing a coherent community and recognising Hove's historic Brunswick Town (built 1820s).

54. I think it most likely the commissioners are unaware that the Brunswick Festival was the first community festival in Brighton or Hove, self-organised by residents of the local neighbourhood. It was inspired as the Brunswick community came together in the early 1980s to demand renovation and preservation of the area's significant cultural and architectural assets. The Brunswick Festival proved a trendsetter for many other communities across Brighton and Hove. Having raised significant funds and publicity for neighbourhood causes since its inception, the Brunswick Festival is a treasured annual highlight of the Brunswick community.

55. Residents of this area identify with Brunswick Town and no one wants to lose the name of Brunswick.

56. I strongly believe that two wards of two councillors each should be retained, namely:

- Regency
- Brunswick and Adelaide

57. **The boundary between these two wards should be the Brighton / Hove town boundary**. This ward boundary should be moved west from its current situation on Norfolk Square / Norfolk Road / Western Street. Those streets all wholly lie on the Brighton side of the historic Brighton / Hove town boundary, so should be within Regency ward. The historic town boundary runs down the middle of Boundary Passage (not visible on the LGBCE's online maps but a well-known and easily walkable local twitten) and Little Western Street. Properties to the west and from York Road onwards are in Hove, and properties to the east, including the Norfolk Square environs, are in Brighton. This proposed change will observe the actual and historic town boundary, as well as reflect the orientation of the local communities.

58. I believe this proposal will maintain two wards with greater significance and meaning for local electors than the recommended Regency ward, and which will result in more effective and convenient local government. I urge the commissioners to adopt these changes in their final recommendations.

J. Hanover and Elm Grove

59. **Ward boundary –** at part 128, the report recommends altering this existing ward's boundary, with great impact on residents of the Phoenix estate. I strongly urge the commissioners to leave this specific boundary unchanged from its existing position. This neighbourhood has a well-established affinity with Hanover and no immediate links with Queen's Park ward. If the commissioners visit the area in-person, they will recognise this immediately.