

## **Boundary Commission for England: Initial Proposals for London**

### **City of Westminster Response**

#### **1. Introduction and summary of response**

- i) The City of Westminster welcomes the opportunity to make representation and acknowledges the strict Rules that the Commission has been obliged to follow. It thanks the Commission for delivering its initial proposals without needing to split wards.
- ii) The City of Westminster agrees in part with the initial proposals for the London Region. It disagrees with the initial proposals made in respect of the North, West and Central London sub-region, as it believes that the Boundary Commission for England should revise its initial proposals in order to ensure that the historic constituency link between the Cities of London and Westminster is maintained.
- iii) This representation makes the City of Westminster's case for the historic constituency link between the Cities of London and Westminster to be maintained and includes a counter-proposal to the Commission's initial proposals which would ensure that the link is maintained.
- iv) The counter-proposal included within this representation meets all the statutory Rules as set out in the Commission's initial report and ensures that all the factors the Boundary Commission may take into account are properly taken into account. These factors include, existing constituency boundaries, local ties, and geographical considerations. The City of Westminster believes that a counter-proposal which seeks to maintain the historic constituency link between the two Cities is likely to gain wider public support than the Commission's initial proposals.

#### **2. Maintaining the historic constituency link between the Cities of London and Westminster. Matters to be considered.**

- i) At the public hearing held by the Commission in Kensington on 17<sup>th</sup> and 18<sup>th</sup> October this year, representatives from all the three main political parties presented counter- proposals which sought to ensure that the historic constituency link between the two Cities is maintained.
- ii) The constituency link between the Cities of London and Westminster has been in place for over sixty years. The unique historical link between the two Cities, has existed over many hundreds of years
- iii) The Boundary Commission's note as included at paragraph 44 of its London initial proposals documents reads "*Although the City of London has had a longstanding constituency link with wards from the City of Westminster, we noted that there are also close communication links between the City of London and the south of the borough of Islington*". Although it is helpful and noted that the Commission recognises the longstanding constituency link, this statement can be readily challenged. This challenge can be made both in terms of the close communication and other links between the City of London and the City of Westminster and in terms of the City of London's links with other local authorities which are not

being used as the basis for determining prospective parliamentary constituencies. The Cities of London and Westminster share a unique set of characteristics and link together within many important spheres. These spheres include those of financial and professional services, retail, culture, architecture, and tourism. Further spheres of commonality are those related to national security and policing. The two Cities are also bound together in civic and ceremonial matters. The City of Westminster does not believe that significant and profound links exist between the City of London and Islington South. In terms of “close communication links”, the daily traffic flow on the two main routes between the Cities of London and Westminster is more than double that on the two main routes connecting Islington with the City of London.

- iv) The proposed ‘City of London and Islington South’ constituency is the only one of 68 initially proposed constituencies in London which is made up of three distinct local government areas. The Member of Parliament for such a constituency would therefore bear an additional burden as compared to other Members of Parliament within the London Region. The counter-proposal made within this representation addresses this issue and would result in a constituency which is formed from the City of London and part of the City of Westminster only.
- v) Both Cities play a key part in the workings of the country’s economy. The City of Westminster is a national and global centre for employment and industry containing some 46,490 enterprise units and 600,000 employees; more than any other London borough by some distance. Based on 2008 data, Westminster’s total Gross Value Added ( GVA) generation stands at £40 billion. This represents 15% of London’s total GVA generation. This is the highest proportion of any London borough, followed by the City of London which has a 2006 GVA of just over £31 billion. The City of Westminster contains more businesses, employees and office floor space than any other local authority in the UK. ( <sup>1</sup> )
- vi) Both Cities share a profile of very high volumes of international migration per 1000 population. Between 2001 and 2008 the City of Westminster had the fourth highest volume of international migration per 1000 within the UK, with only the City of London, Cambridge and Oxford having more. ( <sup>2</sup> )

### 3. **Maintaining the historic constituency link between the Cities of London and Westminster. Background information and further matters to be considered**

- i) **A three-authority constituency and its Member of Parliament.** The proposed ‘City of London and Islington South’ constituency is the only constituency in London which would be comprised of three authorities. The proposed constituency includes parts of two London boroughs in addition to the City of London. The City of Westminster believes that the City of London should be treated as a distinct municipal unit in its own right and that proper consideration should be given to its historic, civic, economic, and other significance. Although it has an electorate of 5,933,

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<sup>1</sup> Taken from the Westminster City Council 2011 Local Economic Assessment. The GVA estimates are taken from Roger Tym and Partners, RTP(2011) and City of London, Oxford Economic (2011).

<sup>2</sup> Westminster City Council State of the City Report

which is smaller than the electorate of any of the wards making up the initially proposed 'City of London and Islington South ' constituency, it should not be treated in the same way as any other ward when constituencies are being redrawn. A three-authority constituency would require the Member of Parliament for such a constituency to liaise and build and develop relationships with three different local authorities and perform all those duties which local authorities, their local communities, financial institutions, professional groups and commercial bodies, would expect their Member of Parliament to deliver on.

- ii) Constituency boundaries and electoral administration. The constituency link between the two Cities is a longstanding one. The City of Westminster has been joined together with the City of London for the purposes of returning a Member of Parliament since 1950. Although changes have been made to the constituency boundary in the intervening period the major part of the constituency has remained unchanged to this day.
- iii) The City of London Corporation, as a relatively small electoral authority and one which delivers its own unique local set of elections, relies to a large extent in the administration of elections on a long-standing administrative arrangement with the City of Westminster. This arrangement extends not just to parliamentary elections, but also to European parliamentary elections and national referendums. This reliance manifests itself in the City of Westminster providing all the election equipment which is needed and also the key personnel who lead on the respective elections and who liaise with the government department concerned and report to the Electoral Commission.
- iv) Geographical considerations and local ties. The City of London is the historic core of London around which the major conurbation grew. In the medieval period, the City of London was the full extent of London. The 18<sup>th</sup> century was a period of rapid growth for London. The Industrial Revolution and London's role at the centre of the evolving British Empire saw the urban area expand beyond the borders of the City of London, most notably during this period towards the West End and Westminster.
- v) The two Cities cover much of the commercial, historical and tourist heart of London, including the Square Mile, St Paul's Cathedral, The Houses of Parliament, Westminster Abbey, Trafalgar Square, Buckingham Palace and Hyde Park. For example, the financial services sector, which was historically based in the City of London (the City or Square Mile are often used as metonyms for the UK financial services industry), has branched out into areas of the City of Westminster. The City of London by comparison has seen the development of retail, cultural and tourist activities of a size and of a type which have previously been associated with the City of Westminster.
- vi) Financial and Professional Services. Today, one of the most important factors uniting the two Cities is their leading role in the provision of financial and professional services. A study last year <sup>(3)</sup> estimated that some 11,000 firms in those sectors operate from more than 16,000

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<sup>3</sup> Research by the Centre for Economic and Business Research on behalf of the City UK, November 2010, from which all subsequent figures derive

premises in the City of London and the City of Westminster. These businesses employ more than 280,000 people ( and provide employment in a range of support services) and contribute in excess of £34 billion to the UK economy. The City of London counts for some three quarters of the employees and value, while the City of Westminster, which has a greater focus on hedge funds and private equity, hosts more businesses (but of smaller size).

- vii) These figures are far higher than those for nearly all other London boroughs. The London Borough of Islington has less than half of the financial and professional services activity of the City of Westminster. Given that the financial and professional services sectors play such a prominent part in the economic well-being of the two Cities, it would be beneficial for one Member of Parliament to deal with those common issues across the area of the two Cities.
- viii) An example of a professional community which works across the two Cities is that of the legal profession. The legal profession forms a major component part of the western side of the City of London, especially in the Temple and Chancery Lane areas. The Royal Courts of Justice, which houses the Court of Appeal of England and Wales; and the High Court of Justice of England and Wales is on the Strand in the City of Westminster.
- ix) There is an international dynamic to many of the financial and professional services businesses based in the two Cities. This international or overseas dynamic is reinforced by the fact that so many global organisations have their base in the two Cities. No other area of London has this global dynamic.
- x) Retail, culture and tourism. The retail sector in the City of Westminster, centred on the West End and Knightsbridge, is world renowned. There are 7000 shops and banks in the City of Westminster <sup>4</sup>. The area in and around Oxford Street, Regent Street, and Bond Street is an international shopping destination and as well as attracting visitors and tourists from abroad it also attracts visitors from other parts of London and the UK, in addition to local residents and local workers. Data has also demonstrated that there is a strong retail presence in the City of London. On 2007 figures, <sup>5</sup> the City of London was fourth among London boroughs in the proportion of its area which contained important retail centres.
- xi) Westminster is the most visited London borough, and expenditure on tourism represents 30% of all the London tourism spend ( in 2007 tourism in the City of Westminster was estimated to total £6.8 billion). The City of Westminster has 40 % of London's hotels and guesthouses as well as international tourist attractions. The night time economy, a unique component of the City of Westminster's economy, is also a destination for visitors and tourists within the West End's internationally renowned entertainment district <sup>6</sup>. The City of London also has a wealth of cultural provision. Examples include, the Museum of London, the Barbican Centre, Guildhall Art Gallery, and Keats House.

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<sup>4</sup> Westminster City Council 2011 Local Economic Assessment

<sup>5</sup> All figures are derived from the Greater London Authority's London Town Centre Health Check, December 2009

<sup>6</sup> Westminster City Council 2011 Local Economic Assessment

- xii) The two Cities share an architectural heritage. Today, of the 587 Grade-1 listed buildings and monuments in Greater London, 264 are found in the current Cities of London and Westminster constituency. Of these, 84 are found in the City of London and 180 in the City of Westminster <sup>7</sup>. In terms of the City of London, a growing number of tall buildings and skyscrapers have been built, principally for use by the financial sector. Examples include, the Heron Tower, Tower 42 and 30 St Mary Axe.
- xiii) By reason of some of the factors previously detailed, both Cities accommodate a large number of visitors in comparison with other boroughs. This presents a number of common challenges. A 2009 study ranked the City of London fourth among London boroughs ( the City being counted as a borough for this purpose) in terms of spending by tourists- behind only the City of Westminster, Kensington and Chelsea and Camden <sup>8</sup>. Islington generated about one third of the tourist expenditure of the City of London. Once geographical area is taken into account, the Cities are easily the two most significant boroughs in terms of the number of visits by tourists, income from tourism and employment in the tourist industry.
- xiv) Transport. Fleet Street and the Strand, the River Thames and the Victoria Embankment are all important arteries between the two Cities and contribute towards reinforcing the link between the two areas.
- xv) The Commission's observation that there are " close communication links between the City of London and the south of the Borough of Islington" has previously been referred to in this representation. If this is taken to refer to transport links, then it is accepted that key thoroughfares connect the City of London with Islington. But the same is true of all the boroughs surrounding the City of London, by reason of the City of London's historical position at the heart or centre of London. The latest available figures, provided by the Corporation of London, show that the daily flow of traffic on the two main routes between the City of London and the City of Westminster is well over twice that on the two main routes connecting the City of London and Islington <sup>9</sup>
- xvi) Security . The two Cities have seen a number of terrorist attacks and violent incidents take place within their areas. During the years from 1970, these have included; in the City of Westminster, the Hyde Park and Regent's Park bombings (1982), the Harrods bombing (1983), and in the City of London, attacks on the Baltic Exchange ( 1992) and Bishopsgate (1993). Aside from on-going challenges associated with terrorism the two Cities have also seen large-scale violent protests in the last decade. Policing and security therefore remains distinct issues which both Cities have in common. Liaison between the City of London Police and the Metropolitan Police Service is a key component part of these issues.

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<sup>7</sup> All figures are derived from English Heritage's National Heritage List for England, as retrieved on-line in October 2011

<sup>8</sup> All figures are derived from the London Development Agency's Local Area Tourism Impact Model of July 2009

<sup>9</sup> Data gathered by the Department of Planning and Transportation of the City Corporation. The latest week-day traffic flow counts are :Aldersgate- 18,824 (2005); Moorgate- 21,577 (2003); Fleet Street- 34,924 (2004); Victoria Embankment- 68,178 (2004)

- xvii) Civic links. In respect of the City of London, functions arranged on behalf of the Lord Mayor and the City Corporation range from small receptions to major national occasions such as State or Guest of Government visits. The Lord Mayor of Westminster represents the City Council at more than 1,000 formal engagements during the year. These will include royal, diplomatic, church, military, community, educational and cultural events. As First Citizen, the Lord Mayor of Westminster will greet members of the Royal Family on engagements undertaken by the Royals within the City of Westminster.

#### **4. Counter- proposal**

- i) The City of Westminster acknowledges the strict Rules that the Boundary Commission for England is required to follow, but has presented a case that applying these Rules does not require that the constituency link between the two Cities, which is a historic and unique one, must be ended.
- ii) There is, in the City of Westminster's view, an alternative to the Commission's initial proposals, which would see the Cities of London and Westminster continue to be linked together at their historic and commercial core. This alternative is illustrated by the table within this response.
- iii) A primary advantage of this counter-proposal, is that it satisfies one of the key principles expressed within this representation, that the City of London should not be joined together with areas in more than one other London borough.
- iv) The counter-proposal would also better reflect existing constituency boundaries. Of the eleven wards in the present Cities of London and Westminster constituency ( including the City of London) , ten would be retained in the new Cities of London and Westminster constituency, along with three others. Of the thirteen wards in the current Kensington constituency, eleven would be retained in the new Kensington constituency, along with four others. The current constituency of Islington South would, as in the initial proposals remain relatively unaffected.
- v) Although the City of Westminster is perhaps not best placed to make detailed comments on the effects of any counter-proposal in relation to other local government areas, there are obvious advantages to accepting the City of Westminster's alternative proposal. In respect of 'Islington South and Holborn', Bloomsbury, in terms of its character, and its position as part of the old Metropolitan borough of Holborn, is best combined with Holborn & Covent Garden and King's Cross. In respect of 'Camden and Regent's Park', the joining up of Abbey Road ward in the same constituency as the Westminster ward of Regent's Park therefore means that all of St John's Wood is in one constituency. In respect of 'Kensington', the counter-proposal would also preserve one of the best aspects of the initial proposal, namely bringing Knightsbridge together with South Kensington into an area that includes the Exhibition Road, Imperial College and world renowned museums. In respect of the 'Cities of London and Westminster' the part of the seat towards Paddington Station and on to Westbourne has good transport links east –west with

the remainder of the seat along the Bayswater Road and by the Circle, Hammersmith and City and Bakerloo lines. In addition the Euston Road makes a more logical boundary than Oxford Street and avoids a divide within the Regent's Street and Oxford Street retail centre. More generally, the City of Westminster's proposal would require crossing of the borough boundary between the City of Westminster and Kensington and Chelsea in only one constituency (the Commission's initial proposal will require this to happen in two constituencies).

30 November 2011

<b>Proposed Camden and Regent's Park</b>		
Belsize	7,555	Camden
Camden Town with Primrose Hill	8,184	Camden
Cantelowes	7,888	Camden
Haverstock	7,880	Camden
Regent's Park	8,115	Camden
St Pancras and Somers Town	8,204	Camden
Church Street	6,729	Westminster
Regent's Park	6,804	Westminster
Abbey Road	6,429	Westminster
Little Venice	6,212	Westminster
Maida Vale	6,255	Westminster
	<b>80,255</b>	

<b>Proposed Kensington</b>		
Colville	4,968	K & C
Golborne	5,391	K & C
Notting Barns	5,626	K & C
St Charles	5,493	K & C
Harrow Road	7,049	Westminster
Queen's Park	7,301	Westminster
Campden	4,404	K & C
Holland	4,869	K & C
Norland	5,404	K & C
Pembridge	4,248	K & C
Abingdon	4,862	K & C
Brompton	4,100	K & C
Hans Town	5,253	K & C
Queen's Gate	4,517	K & C
Knightsbridge and Belgravia	5,059	Westminster
	<b>78,544</b>	

<b>Proposed Cities of London &amp; Westminster</b>		
City of London	5,933	CoL
Bryanston and Dorset Square	6,203	Westminster
Marylebone High Street	5,675	Westminster
Churchill	5,701	Westminster
St James's	6,679	Westminster
Tachbrook	5,524	Westminster
Vincent Square	6,318	Westminster
Warwick	6,113	Westminster
West End	5,565	Westminster
Bayswater	5,838	Westminster
Westbourne	7,196	Westminster
Hyde Park	6,370	Westminster
Lancaster Gate	6,123	Westminster
	<b>79,238</b>	

<b>Proposed Islington South and Holborn</b>		
Bloomsbury	6,660	Camden
Holborn and Covent Garden	7,692	Camden
King's Cross	7,030	Camden
Barnsbury	8,063	Islington
Bunhill	9,075	Islington
Caledonian	8,721	Islington
Canonbury	8,408	Islington
Clerkenwell	7,542	Islington
St Mary's	8,184	Islington
St Peter's	8,259	Islington
	<b>79,634</b>	



