



Comisiwn Ffiniau  
i Gymru

Boundary Commission  
for Wales

Boundary Commission  
for Wales

# Secondary Consultation Period: Representations

Volume 5: 10179-10232

## **BCW-10179/ Kevin Brennan MP/ Cardiff**

Boundary Commission response to Counter Proposals for Cardiff West

Welsh Conservatives proposal

I wish to register my opposition in the strongest terms to the counter-proposal from the Welsh Conservatives with regard to the Cardiff West constituency.

This suggests (without any apparent compelling reasoning) removing Riverside ward, which is situated on the west of the River Taff, from the Cardiff West constituency. It also proposes to add Llandaff North, which is situated on the east side of the River Taff, to the Cardiff West constituency.

It is difficult to discern any logic in these proposals in comparison with the Commission's initial proposal, which meets rule 5 criteria in terms of existing constituencies and geographical considerations by retaining the whole of the current Cardiff West seat located on the west of the River Taff.

The Commission adds Pontyclun to the North West part of the constituency where considerable new housing development is taking place which is strengthening local ties between Cardiff West and Pontyclun.

Riverside ward is in fact very different in character to the city centre, all of which is on the east of the Taff. The city centre consists mainly of commercial properties (shops, restaurants, bars, offices, the stadium, the castle, the railway station etc) with some city centre apartments.

Riverside ward is mainly residential and despite its name extends a long way from the immediate vicinity of the river. South Riverside is one of Wales's most diverse areas, with very close local ties to neighbouring Canton with the district shopping area of Cowbridge Road East (which is also the main bus route) forming a spine linking the 2 wards.

Most local people go to shop along Cowbridge Road rather than the city centre. In fact the Riverside ward covers large parts of the area which most local residents would regard as Canton, ending as it does at Leckwith and Llandaff Roads. Where Canton and Riverside wards meet near the historic crossroads on Cowbridge Road East is the place local residents regard as the heart of the Canton community.

The Pontcanna part adds to Riverside ward's unique diversity by being the home to a large number Welsh speakers as increasingly is neighbouring Canton. Children from Riverside ward overwhelmingly attend schools in the west of the city. At secondary level predominantly they attend the highly diverse Fitzalan High School (Canton Ward), the Welsh medium Ysgol Gyfun Plasmawr (Fairwater), and Church in

Wales Bishop of Llandaff Church in Wales School (Llandaff).

Similarly the ties between Riverside ward and Llandaff are strong. The major public open space of Llandaff Fields is itself situated in Riverside Ward.

In practice there are no particularly strong community links across the river, as the residential areas of Riverside and the Cardiff Central residential areas are separated, not only by the Taff, but by the commercial city centre, the civic centre, and large swathes of park land.

Turning to the proposal for Llandaff North it is again difficult to see how this would be anywhere near as coherent as the Commission's original proposal. Llandaff and Llandaff North have little in common other than that they both contain the word Llandaff. They are on opposite sides of the river with a bridge situated well away from the housing in the Llandaff ward. The historic City of Llandaff is very distinct from the community of Llandaff North, which has its own district shopping centre. In practice the two communities are not strongly linked.

The Danescourt housing estate area of Llandaff ward, which also has its own shopping centre, is part of the catchment area for Radyr Comprehensive School with has no close links across to Llandaff North. Indeed Llandaff North's local ties are with the neighbouring areas of Whitchurch and Gabalfa on the east of the Taff, rather than Llandaff ward to the west. This proposal is therefore again inferior to the Commission's on Rule 5 criteria.

#### Liberal Democrats proposal

This suggestion would constitute a very radical departure from the Commission's criteria and create a seat that could not credibly be described as a Cardiff West constituency at all. It would appear to be an afterthought and consequential of changes that the Liberal Democrats are proposing elsewhere in Cardiff, rather than a coherent proposal for Cardiff West based on the Rule 5 criteria.

It would remove Radyr, which is closely linked to its neighbouring wards in Cardiff West and whose Comprehensive School mainly serves those wards e.g. Danescourt (Llandaff Ward) and Creigiau. Pentyrch also has strong links with Creigiau. The ongoing housing development in the area is strengthening the ties between these wards in Cardiff West. It makes little sense to carve them out just as they are becoming more closely tied by new housing.

The addition of Llanharan, Llanharry and Brynna wards makes no sense at all, as they have no ties with Cardiff West. They appear to have been added here purely to make up the numbers and reach the quota, rather than to meet the criteria in rule 5, particularly geographical considerations, existing constituencies and local ties.

I therefore oppose changing the Boundary Commission proposal for Cardiff West. As

a consequence I see no need to change the proposals for Cardiff as a whole which enables 4 coherent Parliament constituencies to be retained for Wales' Capital City. For ease of reference I reproduce my original submission below.

'I have consistently argued, with the support of local constituents, in recent boundary reviews that it is desirable to retain a parliamentary seat located to the west of the River Taff, reflecting the community and transport connections of Cardiff West.

The Commission in its proposals has in slightly different forms supported that approach in its most recent proposals. The latest draft proposal returns to a previous approach supported by the Commission by adding the ward of Pontyclun. Although this lies outwith the boundaries of the City and County of Cardiff, it does reflect the recent housing development in the north-west of the constituency which extends in the direction of Pontyclun. Given the constraints that the Commission is working under it is difficult to see how any alternative proposal would meet the principles the Commission is required to follow without significantly affecting the coherence of parliamentary representation across Cardiff as a whole.

I therefore not only support the proposals for Cardiff West, but for Cardiff as a whole.'

## **BCW-10180/ Cllr Stephen Cunnah/ Cardiff**

I am a councillor representing the Canton ward on Cardiff Council. I wish to comment in relation to the proposals for a new Cardiff West constituency. I strongly support comments submitted by Cardiff West MP Kevin Brennan. I agree that it is desirable to retain a parliamentary seat located to the west of the River Taff, reflecting the community and transport connections of Cardiff West.

Following from this position, I also wish to strongly oppose the counter-proposal for a Cardiff West constituency submitted by the Welsh Conservatives. This proposes moving Riverside ward into a new Cardiff Central constituency, which I particularly believe would be a mistake.

The Riverside ward is a sister ward to Canton. For those residents who are not close followers of local electoral boundaries, it is difficult to know where the one ward ends and the other begins. The Canton Community Hall, Canton Court housing estate, Canton Hotel, and Tafarn Treganna (Canton Pub) are all in the "Riverside" ward. Even upon entering the Riverside ward at its most eastern point, on the banks of the Taff, the bridge crossing into the west of Cardiff from the City Centre is referred to locally as "Canton Bridge".

The two wards share so many significant services. For example:

- Cowbridge Road East runs through the two wards, the commercial heart of the west of Cardiff.
- Primary and secondary school catchments, in both Welsh and English medium, are shared across the wards.
- Other locally-organised council services cover the two wards, for example they share Canton Library, Canton Community Hall, and even the same bin day.
- Primary care services are planned across the two wards.
- Local policing is managed across the two wards.
- Several of the places of worship are organised across the two wards.
- Almost all local bus services serving the west of the city pass through Canton and/or Riverside before terminating in the centre.

Riverside is an integral part of the west of Cardiff in so many ways. It simply does not share these links to other parts of the city on the opposite side of the River Taff.

BCW-10181/ [REDACTED] / Cardiff

**From:** [REDACTED]

**Sent:** 28 March 2022 21:43

**To:** BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>

**Subject:** Boundary Changes Riverside ward

Hi,

I would like to express my opposition in the strongest terms to the proposal that the Riverside ward be moved to Cardiff Central.

Having lived my entire life in this fantastic ward I know that this ward is intrinsically linked culturally to Cardiff West.

Families, friends, religious and cultural groups share a unique bond within Cardiff West.

Many have attended local Primary schools then go on to study at Fitzalan High school. Local sports teams and youth organisations.

Doctors surgeries are also shared, local issues facing communities in Canton overlap with Riverside. The main shopping place for people in Riverside is Canton shops.

Why you making this change.

Leave Riverside as it is please.

Thanks

[REDACTED]



Dear Boundary Commission for Wales,

The largest minority ethnic community in Swansea is Bangladeshi and we are writing on behalf of the various Bangladeshi organisations that represent them in support of the attached counter-proposal to the Boundary Commission for Wales presented by [redacted] and supported by [redacted] on March 1st in Swansea.

In summary, the counter-proposal

1. Reunites the Bangladeshi community, alongside other minority communities into one constituency ie Swansea West & Gower
2. Continues the natural boundary of the River Tawe of the current constituency boundary of Swansea West
3. Extends westwards to the Gower peninsular (uniting the Mumbles community council into the same constituency)
4. Reunites Uplands and Sketty and therefore re-combines Uplands, the city centre and Town Hill with Sketty, Mayals, Dunvant and Killay.  
These communities are well integrated in particular between Sketty, where the University campus and hospital is, and Uplands where the students and other communities connected to Sketty and westwards live.
5. Creates a coherent constituency of Swansea North of rural and semi-rural villages and towns including neighbouring and connected welsh-speaking communities
6. The local ties within communities and between different minority communities have been built over many years and it would be disruptive and damaging to break them between different constituencies as the original BCW proposals suggested. It is helpful to have one Member of Parliament for us to work with.
7. The attached counterproposal suggests a Swansea West & Gower constituency that looks westwards not eastwards which is something that the Bangladeshi and other minority communities strongly support as historically we have received a warmer reception to the west
8. This consideration will become more important during increasingly difficult economic times and when migration is increasing from war zones

Therefore we very much support the attached counter-proposals in terms of the community coherence and well-being of the Bangladeshi and other minority communities. It also makes much more sense in terms of the geography and established connections for working, leisure and worship.

Many thanks and best wishes

[redacted]  
[redacted]  
On behalf of the Swansea Bangladeshi community

[redacted]  
[redacted]  
As trusty of Swansea Mosque and Community Centre

[redacted]  
On behalf of Swansea Mosque and Community Centre

[redacted]  
Vice chairman of Bangladesh Welfare Association (Swansea Branch)



**BCW-10183/ [REDACTED] / Llanwrda**

**From:** [REDACTED]  
**Sent:** [REDACTED] arch 2022 15:15  
**To:** BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>  
**Subject:** Proposal Cilycwm/Ceredigion

Sirs

I strongly object to the proposal to make Cilycwm part of Ceredigion. While Llyn Brianne is in Ceredigion, it is separated from the rest of the County by Wales' last wilderness, with only a narrow and perilous direct route through to Tregaron. Most of Cilycwm is close to the arterial A40, which makes Llandeilo and Carmarthen our natural community centres.

Inclusion in the new Carmarthen seat is the most logical outcome because of these community connections and historic links such as our General Hospital at Glangwili.

Yours Faithfully

[REDACTED]

**BCW-10184/ [REDACTED] / Pwll Trap**

**From:** [REDACTED]  
**Sent:** [REDACTED] arch 2022 23:11  
**To:** BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>  
**Subject:** Proposed boundry changes.

I think that the proposal to join our area of Pwll Trap, St Clears into community links with Llanelli is proposed by a person or persons that really have not thought out the historical and different characters of the both areas. I would like to vote against these proposals. If there is anything else you may advise me to do then you have my e.mail address.

[REDACTED]



**BCW-10185/ Anna McMorris MP/ Cardiff North**

**From:** [REDACTED]

**Sent:** 29 March 2022 09:49

**To:** BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>

**Subject:** Boundary Commission Submission - Anna McMorris MP

To Whom it May Concern,

Please find attached a formal submission to the Boundary Review from Anna McMorris MP for Cardiff North.

Many thanks,

[REDACTED]

By email: [bcw@boundaries.wales](mailto:bcw@boundaries.wales)

28<sup>th</sup> March 2022

Dear Commission

I write in my capacity as Member of Parliament for Cardiff North. This submission relates to the Commission's Initial Proposals for Cardiff North and the three other adjoining seats in Cardiff – Cardiff Central, Cardiff West and Cardiff South and Penarth. This submission also addresses the counter-proposals put forward during the consultation period.

I'd firstly like to address the context in which the Boundary Review is taking place. I am concerned about the impact of basing the Review on figures of individual voter registration during the height of a Coronavirus pandemic. Local Authorities were stretched beyond capacity and delivering front-line services to our communities rather than prioritising inputting data.

I believe this decision disproportionately and detrimentally impacts constituencies with a high concentration of young people, students, migrant communities and disadvantaged communities who may be less likely to be on the electoral register. I believe equalisation of constituencies should be based upon overall adult population, not just those on the electoral register. As a Member of Parliament, I represent all of my constituents equally, not just those registered to vote.

### **Initial Proposals**

I welcome the Initial Proposals for the constituency of Cardiff North – in my capacity as its Member of Parliament, but also as a local resident, which would see Cardiff North remain largely intact with the addition of Taff's Well. I also welcome the Initial Proposals made for Cardiff West, Cardiff Central and Cardiff South and Penarth which, as a whole, would entail just two wards within Cardiff moving constituency.

I appreciate that the Cardiff North constituency does not meet the statutory requirements in respect of the size of the electorate. I therefore welcome the Commission's sensible proposal to combine the whole of the existing Cardiff North constituency with the electoral ward of Taff's Well to form a constituency that would meet the statutory electoral range. Similarly, given that Cardiff Central is under-sized and Cardiff South and Penarth is over-sized, the proposals to add Rumney and Llanrumney wards to Cardiff Central is sensible and welcomed.

The Commission's proposals acknowledge the geographical links with the natural boundary of the Taff River and Taff's Well would therefore be a natural addition to the Cardiff North constituency. There are existing ties with good transport links between Taff's Well and north Cardiff by rail and road. There are good transport links via the



A470 and Manor Way between the combined areas, which make these proposals sensible and are therefore welcomed.

The Commission is right to recognise and respect the areas with existing community links within Cardiff North:

### **Whitchurch and Llandaff North**

Whitchurch and Llandaff North have many community ties. Many children living in Whitchurch attend schools in Llandaff North, given its close proximity to the outskirts of the Whitchurch ward for example, Ysgol Glantaf and Hawthorn Primary. Given the natural boundary of the Taff River, the people of Whitchurch and Llandaff North feel very connected as communities. Public transport links out of the City centre head towards Whitchurch and these links are longstanding. The two wards share many amenities and services.

### **Llandaff North and Gabalfa**

Llandaff North and Gabalfa are neighbouring wards that are inextricably linked. They are connected by one of the oldest housing estates in Wales which straddles these two wards and both communities are brought together by the Gabalfa roundabout. Residents of both Gabalfa and Llandaff North look to Whitchurch high street as the main shopping district, which is also connected by the Gabalfa roundabout, linking all three wards.

### **Heath and Llanishen**

The Heath ward borders the Llanishen ward. The two communities are closely tied, not just by transport links, but by school catchment areas, services and amenities. Given the close proximity of schools such as Ton Yr Ywen in Heath, many children living close by in Llanishen attend there. The two wards have good transport links, with a train line running through. Both wards share access to amenities such as Llanishen Leisure Centre, Cardiff Lifestyle Park, Sports Clubs, Community Centres, green spaces and much more.

### **Counter-Proposals**

It is for the reasons set out above with respect to recognising longstanding, existing community links in Cardiff North that I would like to express my deep concern over the Conservative Party's counter-proposal to the Cardiff North boundary, which would see Llandaff North move from Cardiff North to Cardiff West and Trowbridge added to Cardiff North.

As set out, the natural boundary of the Taff River, the sharing of amenities, schools and services mean that the communities of Llandaff North and Whitchurch feel very connected. Similarly, moving Llandaff North to Cardiff West would also draw a line

through the Mynachdy Estate - which is wholly in Cardiff North. If Llandaff North was to move to Cardiff West it would halve one of the oldest housing estates in Wales as part of it is in Gabalfa. With all three communities all linked and accessed via the Gabalfa roundabout, the existing local ties must not be ignored.

By contrast, there is no natural link between Llandaff North and the other side of the river in Cardiff West, which lacks proper transport and community links to feel any sense of connection. Llandaff North and Llandaff have little in common, other than they both contain the word Llandaff. Being on opposite sides of the river, the historic City of Llandaff is very distinct from the community of Llandaff North, which has its own shopping district. Llandaff North's local ties with the neighbouring areas of Whitchurch and Gabalfa on the east of the Taff makes the Commission's proposals more suitable.

There is also no natural connection between Cardiff North and Trowbridge. This counter-proposal ignores the significant local ties between the wards of Llandaff North and Whitchurch and the subsequent limited transport links.

Making this move would be contrary to Rule 5 and respecting local ties. It is therefore difficult to discern any logic in the proposal to move Llandaff North to Cardiff West, in comparison with the Commission's Initial Proposals to retain the whole of Cardiff North with the addition of Taff's Well and to only affect two wards in Cardiff instead of three as proposed by the Conservatives.

Similarly, the Liberal Democrats' counter-proposal involves moving a higher number of wards between existing constituencies in Cardiff. This counter-proposal would see Gabalfa and the Heath, currently in Cardiff North, moved to Cardiff Central. As set out above with respect to the links between Gabalfa and the Heath, this proposal again fails to take into consideration the strong local ties that exist in these wards. The Heath ward is closely tied to Llanishen and Whitchurch as neighbouring wards and these communities are linked not just by transport, but also school catchment areas.

In summary, Rule 5 Schedule 2 of the Act specifies a number of factors that the Commission may take into account. These include boundaries of existing constituencies and local ties impacted by constituency changes. The counter-proposals from the Conservative Party move three wards and the Liberal Democrats move five wards within Cardiff, as opposed to the Commission's proposed two wards. I have also outlined the significant impact of breaking local ties as a result of both counter-proposals which would be worse than the Commission's proposals.

I do not support any of these counter proposals and would submit that they be rejected on the basis of what I have set out above.

### **Conclusion**

I accept that constituency sizes in Cardiff don't meet statutory requirements and changes must be made in order to meet the statutory electoral range. I welcome the



Commission's Initial Proposals as I believe it is a sensible approach to such changes. The Commission's proposals for the four Parliamentary constituencies in Cardiff meet both the electoral quota as defined by the Act, but are also the least disruptive and respectful of local ties based on the geographical considerations and statutory factors within the Act.

Thank you for giving this matter your consideration.

Yours sincerely,



**Anna McMorrin MP**

Member of Parliament for Cardiff North

Aelod Seneddol Gogledd Caerdydd

BCW-10186/ [REDACTED] / Llangeler

From: [REDACTED]

Sent: 28 March 2022 15:03

To: BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>

Subject:

Dear Sir/Madam

It has come to my notice that there is a proposal being put forward by Ceredigion County Council to move the ward of Cenarth and Llangeler into a new Ceredigion constituency.

As a resident of 39 years standing in the parish of Llangeler it is my strong opinion that this proposal should be opposed.

The River Teifi has always presented a natural boundary between the Counties of Carmarthenshire and Ceredigion and Carmarthen has always been the administrative centre.

Similarly the parishes of Llangeler and Cenarth have been historically linked to Glangwili hospital in Carmarthen and has strong links with communities and facilities in Carmarthenshire and is a natural fit with the County and does not have any administrative links with Ceredigion, save for the period of time when the three Counties of Carmarthenshire, Pembrokeshire and Cardiganshire were linked in the much disliked County of Dyfed.

Historically and geographically our connections in Llangeler and Cenarth have been with Carmarthen and Carmarthenshire and it would be inappropriate for the wards to be moved and I would strongly suggest that the Boundaries Commission's current proposals are the correct ones and the ward of Cenarth and Llangeler should be included in the new Carmarthen seat.

Yours faithfully,

[REDACTED]



This submission will comment on the Commission's initial proposals, the counterproposals and their compliance with the statutory factors in section 3.4 of the Commission's Guide to the 2023 Review.

Rule 5 in Schedule 2 of the Act specifies that the following factors may be considered as the Commission develops proposals

- special geographical considerations, including, in particular, the size, shape and
- accessibility of a constituency
- local government boundaries that existed or were prospective on 1 December 2020
- boundaries of existing constituencies
- any 'local ties' that would be broken by changes in constituencies
- the inconveniences attendant on such changes.

This Boundary Review and its proposals are limited by the requirement to meet the Electoral Quota (EQ) framework and the number of electors on the register as December 2020. My submission is therefore restrained by that.

### **Initial Proposals**

I welcome the Commission's initial proposals for the constituency of Cardiff Central as a resident. Equally I welcome the proposals that have been made for Cardiff North, Cardiff West and Cardiff South and Penarth.

The typically large electorates of wards in Cardiff do reduce the number of options available to the Commission. Given that the Cardiff Central constituency is under-sized and the Cardiff South and Penarth constituency is over-sized, the logical extension of the current Cardiff Central constituency with the addition of the Rumney and Llanrumney wards is sensible and is therefore welcomed.

I would add that the Commission is right to recognise areas with existing community links already within Cardiff Central:

### **Cathays and Plasnewydd**

Cathays and Plasnewydd have many community ties. They are overwhelmingly the two primary wards where the very substantial student population from Cardiff University, Cardiff Metropolitan University and the Cardiff campus of the University of South Wales lives. The secondary school catchment area for Cathays High School includes parts of Plasnewydd.

The community connections across Cathays, Plasnewydd and indeed Penylan and parts of Cyncoed are such that residents in all three electoral wards consider themselves part of the Roath community around the shopping districts of Crwys Rd, Albany Rd and City Rd. These community links, including the public transport links out of the City centre, are long-standing and are correctly respected by the Commission's initial proposals.

The children at primary schools in Cathays and Plasnewydd attend Cathays High School, Bro Edern (situated in Penylan) or Cardiff High School (situated in Cyncoed).

### Plasnewydd /Roath and Penylan

Many residents of Penylan and Plasnewydd consider themselves to be part of the Roath community and the place name “Roath” is very well established and understood. It is seen on school names, Roath Park Primary School, and on our landmark geographical features such as Roath Recreation Ground, “The Rec.” which is in the Penylan ward.

The electors of Penylan look towards the shopping district of Albany Road and Wellfield Road in Plasnewydd. The children at primary schools in Penylan attend Cathays High School travelling along Albany Road and Crwys Road main thoroughfares on their journeys to school.

### Penylan and Cyncoed

Many residents of Penylan and parts of Cyncoed consider themselves to be part of the Roath community and the place name “Roath” is very well established and understood. It is seen on our landmark geographical features such as Roath Park and Roath Park Lake, both geographically being within the Cyncoed ward. Residents of both wards look to Albany Road and Wellfield Road particularly for their shopping and other amenities.

### Rumney and Llanrumney

The Commission’s proposed inclusion of Rumney and Llanrumney within Cardiff Central builds on both wards already having very good and well-established transport links, both road and public transport, to the existing Cardiff Central constituency. Newport Road is the main road from Llanrumney, through Rumney, through both Penylan and Adamsdown and into Cathays. Rumney and Llanrumney are wards with deep and extensive local ties to each other. The school catchment areas for Llanrumney and Rumney are inter-linked at Eastern High school. The main recreation area, is the Rumney Recreation Ground, situated in Llanrumney.

### **Counter- Proposals**

Several counterproposals relating to Cardiff Central and the adjoining three Cardiff constituencies have been made. Having read the counter-proposals and listened to the oral evidence and questions and answers relating to them at the Commission’s hearing in Cardiff on Thursday 17<sup>th</sup> February 2022, I suggest that they do not represent better solutions and I outline below, the areas within each proposal that fail to meet the factors outlined in Rule 5, Schedule 2 of the Act.

### **Conservative Party Counter Proposal**

This suggests (without any apparent compelling reasoning) removing Riverside ward, which is situated on the west of the River Taff, from the Cardiff West constituency and adding it to the Cardiff Central constituency.

It is difficult to discern any logic in these proposals in comparison with the Commission’s initial proposal, which meets rule 5 criteria in terms of existing constituencies and geographical considerations by retaining the whole of the current Cardiff West seat located on the west of the River Taff.

Riverside ward is in fact very different in character to the city centre (Cathays ward), all of which is on the east of the Taff. The city centre consists mainly of commercial properties

(shops, restaurants, bars, offices, the stadium, the castle, the railway station etc) with some city centre apartments.

Riverside ward is mainly residential and despite its name extends a long way from the immediate vicinity of the river. South Riverside is one of Wales's most diverse areas, with very close local ties to neighbouring Canton with the district shopping area of Cowbridge Road East (which is also the main bus route) forming a spine linking the 2 wards.

Most local people go to shop along Cowbridge Road rather than the city centre. In fact the Riverside ward covers large parts of the area which most local residents would regard as Canton, ending as it does at Leckwith and Llandaff Roads. Where Canton and Riverside wards meet near the historic crossroads on Cowbridge Road East is the place local residents regard as the heart of the Canton community.

The Pontcanna part adds to Riverside ward's unique diversity by being the home to a large number Welsh speakers as increasingly is neighbouring Canton. Children from Riverside ward overwhelmingly attend schools in the west of the city. At secondary level predominantly they attend the highly diverse Fitzalan High School (Canton Ward), the Welsh medium Ysgol Gyfun Plasmawr (Fairwater), and Church in Wales Bishop of Llandaff Church in Wales School (Llandaff).

In practice there are very few community links across the river, as the residential areas of Riverside and the Cardiff Central residential areas are separated, not only by the very significant geographical presence of the River Taff, but by the commercial city centre, the civic centre, and large swathes of park land.

This counter proposal also involves moving the Rumney and Llanrumney wards into two different constituencies. This again ignores the significant local ties between the wards. The school catchment areas for Llanrumney and Rumney are inter-linked at Eastern High school.

This proposal moves Llanrumney into a revised Cardiff North constituency. There are no particularly strong links between Llanrumney and Pontprennau & Old St Mellons. Indeed, the transport links are extremely limited between Llanrumney and Cardiff North. In practice there are no particularly strong community links at all between these two wards, and the proposal to move the wards of Llanrumney and Rumney into different constituencies is completely contrary to Rule 5 and respecting local ties.

This counter-proposal also involves a total of three electoral wards within Cardiff moving from their current constituencies; compared to the two wards affected by the Commission's Initial Proposals.

### **Liberal Democrat Counter Proposal**

The Liberal Democrats' counter proposal involves moving a significantly higher number of wards between existing constituencies in Cardiff. This counter-proposal, which returns Rumney and Llanrumney to Cardiff South and adds Gabalfa and the Heath to Cardiff Central again fails to take into account the strong local ties that exist.

The Gabalfa ward is very closely linked into the Llandaff North ward. Indeed, the Gabalfa Estate, one of the oldest housing estates in Wales, straddles these two wards. The Gabalfa roundabout brings together the communities of Whitchurch and Gabalfa. Residents in both Gabalfa and Llandaff North look towards the shopping district of Merthyr Road in Whitchurch.

The Heath ward borders the Llanishen ward. The two communities are closely tied, not just by transport links, but by school catchment areas, services and amenities. Given the close proximity of schools such as Ton Yr Ywen in Heath, many children living close by in Llanishen attend. The two wards have good transport links, with a train line running through. Both wards share access to amenities such as Llanishen Lesiure Centre, Cardiff Lifestyle Park, Sports Clubs, Community Centres, green spaces and much more.

### **Summary**

Rule 5 in Schedule 2 of the Act specifies a number of factors that the Commission may take into account.

### **Boundaries of existing constituencies**

The initial proposals from the Commission move two wards from existing constituencies.

The counter proposals from the Conservatives move three.

The counter proposals from the Liberal Democrats move five wards within Cardiff into a different constituency.

Neither of these proposals are a better solution than the Commission's initial proposals. In fact, both are a worse solution.

### **Any 'local ties' that would be broken by changes in constituencies**

As is outlined above, the 'local ties' impacted by the Conservative counter-proposal are significant in regards to the impact of their proposals on Riverside, Llandaff North and Llanrumney.

The 'local ties' impacted by the Liberal Democrats' proposal are significant in relation to Gabalfa, Heath, Llanrumney, Radyr and Pentyrch.

Neither of these proposals are a better solution than the Commission's initial proposals. In fact, both are a worse solution with the Liberal Democrats' solution being significantly worse for the reasons set out above.

### **Conclusion**

I accept that there are some concerns about the links between Trowbridge and Splott in the initial set of proposals. However, as set out above, the various counterproposals all have greater failings in adhering to the statutory factors contained in Rule 5, Schedule 2.

I therefore submit that the Commission should reject the counter proposals.



The Commission's proposals for the four parliamentary constituencies in Cardiff meet both the electoral quota as defined by the Act but are also the least disruptive proposals based both on the statutory factors and special geographical considerations within the Act.

This submission will comment on the Commission's initial proposals, the counterproposals and their compliance with the statutory factors in section 3.4 of the Commission's Guide to the 2023 Review.

Rule 5 in Schedule 2 of the Act specifies that the following factors may be considered as the Commission develops proposals

- special geographical considerations, including, in particular, the size, shape and
- accessibility of a constituency
- local government boundaries that existed or were prospective on 1 December 2020
- boundaries of existing constituencies
- any 'local ties' that would be broken by changes in constituencies
- the inconveniences attendant on such changes.

This Boundary Review and its proposals are limited by the requirement to meet the Electoral Quota (EQ) framework and the number of electors on the register as December 2020. My submission is therefore restrained by that.

### **Initial Proposals**

I welcome the Commission's initial proposals for the constituency of Cardiff Central as a resident. Equally I welcome the proposals that have been made for Cardiff North, Cardiff West and Cardiff South and Penarth.

The typically large electorates of wards in Cardiff do reduce the number of options available to the Commission. Given that the Cardiff Central constituency is under-sized and the Cardiff South and Penarth constituency is over-sized, the logical extension of the current Cardiff Central constituency with the addition of the Rumney and Llanrumney wards is sensible and is therefore welcomed.

I would add that the Commission is right to recognise areas with existing community links already within Cardiff Central:

### **Cathays and Plasnewydd**

Cathays and Plasnewydd have many community ties. They are overwhelmingly the two primary wards where the very substantial student population from Cardiff University, Cardiff Metropolitan University and the Cardiff campus of the University of South Wales lives. The secondary school catchment area for Cathays High School includes parts of Plasnewydd.

The community connections across Cathays, Plasnewydd and indeed Penylan and parts of Cyncoed are such that residents in all three electoral wards consider themselves part of the Roath community around the shopping districts of Crwys Rd, Albany Rd and City Rd. These community links, including the public transport links out of the City centre, are long-standing and are correctly respected by the Commission's initial proposals.

The children at primary schools in Cathays and Plasnewydd attend Cathays High School, Bro Edern (situated in Penylan) or Cardiff High School (situated in Cyncoed).

### Plasnewydd /Roath and Penylan

Many residents of Penylan and Plasnewydd consider themselves to be part of the Roath community and the place name “Roath” is very well established and understood. It is seen on school names, Roath Park Primary School, and on our landmark geographical features such as Roath Recreation Ground, “The Rec.” which is in the Penylan ward.

The electors of Penylan look towards the shopping district of Albany Road and Wellfield Road in Plasnewydd. The children at primary schools in Penylan attend Cathays High School travelling along Albany Road and Crwys Road main thoroughfares on their journeys to school.

### Penylan and Cyncoed

Many residents of Penylan and parts of Cyncoed consider themselves to be part of the Roath community and the place name “Roath” is very well established and understood. It is seen on our landmark geographical features such as Roath Park and Roath Park Lake, both geographically being within the Cyncoed ward. Residents of both wards look to Albany Road and Wellfield Road particularly for their shopping and other amenities.

### Rumney and Llanrumney

The Commission’s proposed inclusion of Rumney and Llanrumney within Cardiff Central builds on both wards already having very good and well-established transport links, both road and public transport, to the existing Cardiff Central constituency. Newport Road is the main road from Llanrumney, through Rumney, through both Penylan and Adamsdown and into Cathays. Rumney and Llanrumney are wards with deep and extensive local ties to each other. The school catchment areas for Llanrumney and Rumney are inter-linked at Eastern High school. The main recreation area, is the Rumney Recreation Ground, situated in Llanrumney.

### **Counter- Proposals**

Several counterproposals relating to Cardiff Central and the adjoining three Cardiff constituencies have been made. Having read the counter-proposals and listened to the oral evidence and questions and answers relating to them at the Commission’s hearing in Cardiff on Thursday 17<sup>th</sup> February 2022, I suggest that they do not represent better solutions and I outline below, the areas within each proposal that fail to meet the factors outlined in Rule 5, Schedule 2 of the Act.

### **Conservative Party Counter Proposal**

This suggests (without any apparent compelling reasoning) removing Riverside ward, which is situated on the west of the River Taff, from the Cardiff West constituency and adding it to the Cardiff Central constituency.

It is difficult to discern any logic in these proposals in comparison with the Commission’s initial proposal, which meets rule 5 criteria in terms of existing constituencies and geographical considerations by retaining the whole of the current Cardiff West seat located on the west of the River Taff.

Riverside ward is in fact very different in character to the city centre (Cathays ward), all of which is on the east of the Taff. The city centre consists mainly of commercial properties

(shops, restaurants, bars, offices, the stadium, the castle, the railway station etc) with some city centre apartments.

Riverside ward is mainly residential and despite its name extends a long way from the immediate vicinity of the river. South Riverside is one of Wales's most diverse areas, with very close local ties to neighbouring Canton with the district shopping area of Cowbridge Road East (which is also the main bus route) forming a spine linking the 2 wards.

Most local people go to shop along Cowbridge Road rather than the city centre. In fact the Riverside ward covers large parts of the area which most local residents would regard as Canton, ending as it does at Leckwith and Llandaff Roads. Where Canton and Riverside wards meet near the historic crossroads on Cowbridge Road East is the place local residents regard as the heart of the Canton community.

The Pontcanna part adds to Riverside ward's unique diversity by being the home to a large number Welsh speakers as increasingly is neighbouring Canton. Children from Riverside ward overwhelmingly attend schools in the west of the city. At secondary level predominantly they attend the highly diverse Fitzalan High School (Canton Ward), the Welsh medium Ysgol Gyfun Plasmawr (Fairwater), and Church in Wales Bishop of Llandaff Church in Wales School (Llandaff).

In practice there are very few community links across the river, as the residential areas of Riverside and the Cardiff Central residential areas are separated, not only by the very significant geographical presence of the River Taff, but by the commercial city centre, the civic centre, and large swathes of park land.

This counter proposal also involves moving the Rumney and Llanrumney wards into two different constituencies. This again ignores the significant local ties between the wards. The school catchment areas for Llanrumney and Rumney are inter-linked at Eastern High school.

This proposal moves Llanrumney into a revised Cardiff North constituency. There are no particularly strong links between Llanrumney and Pontprennau & Old St Mellons. Indeed, the transport links are extremely limited between Llanrumney and Cardiff North. In practice there are no particularly strong community links at all between these two wards, and the proposal to move the wards of Llanrumney and Rumney into different constituencies is completely contrary to Rule 5 and respecting local ties.

This counter-proposal also involves a total of three electoral wards within Cardiff moving from their current constituencies; compared to the two wards affected by the Commission's Initial Proposals.

### **Liberal Democrat Counter Proposal**

The Liberal Democrats' counter proposal involves moving a significantly higher number of wards between existing constituencies in Cardiff. This counter-proposal, which returns Rumney and Llanrumney to Cardiff South and adds Gabalfa and the Heath to Cardiff Central again fails to take into account the strong local ties that exist.



The Gabalfa ward is very closely linked into the Llandaff North ward. Indeed, the Gabalfa Estate, one of the oldest housing estates in Wales, straddles these two wards. The Gabalfa roundabout brings together the communities of Whitchurch and Gabalfa. Residents in both Gabalfa and Llandaff North look towards the shopping district of Merthyr Road in Whitchurch.

The Heath ward borders the Llanishen ward. The two communities are closely tied, not just by transport links, but by school catchment areas, services and amenities. Given the close proximity of schools such as Ton Yr Ywen in Heath, many children living close by in Llanishen attend. The two wards have good transport links, with a train line running through. Both wards share access to amenities such as Llanishen Lesiure Centre, Cardiff Lifestyle Park, Sports Clubs, Community Centres, green spaces and much more.

### **Summary**

Rule 5 in Schedule 2 of the Act specifies a number of factors that the Commission may take into account.

### **Boundaries of existing constituencies**

The initial proposals from the Commission move two wards from existing constituencies.

The counter proposals from the Conservatives move three.

The counter proposals from the Liberal Democrats move five wards within Cardiff into a different constituency.

Neither of these proposals are a better solution than the Commission's initial proposals. In fact, both are a worse solution.

### **Any 'local ties' that would be broken by changes in constituencies**

As is outlined above, the 'local ties' impacted by the Conservative counter-proposal are significant in regards to the impact of their proposals on Riverside, Llandaff North and Llanrumney.

The 'local ties' impacted by the Liberal Democrats' proposal are significant in relation to Gabalfa, Heath, Llanrumney, Radyr and Pentyrch.

Neither of these proposals are a better solution than the Commission's initial proposals. In fact, both are a worse solution with the Liberal Democrats' solution being significantly worse for the reasons set out above.

### **Conclusion**

I accept that there are some concerns about the links between Trowbridge and Splott in the initial set of proposals. However, as set out above, the various counterproposals all have greater failings in adhering to the statutory factors contained in Rule 5, Schedule 2.

I therefore submit that the Commission should reject the counter proposals.

The Commission's proposals for the four parliamentary constituencies in Cardiff meet both the electoral quota as defined by the Act but are also the least disruptive proposals based both on the statutory factors and special geographical considerations within the Act.

I'm commenting on the Commission's initial proposals, counterproposals and referencing their compliance with the statutory factors in section 3.4 of the Commission's Guide to the 2023 Review.

This Boundary Review and its proposals are limited by the requirement to meet the Electoral Quota (EQ) framework and the number of electors on the register as December 2020. My submission is therefore notes that the electoral register for an area like Cardiff Central is fluid, and does not necessarily reflect the actual population, due to the 'churn' caused by the number of students and young people living in this area.

#### Initial Proposals

I support the Commission's initial proposals for the constituency of Cardiff Central as a local councillor. Equally I welcome the proposals that have been made for the other Cardiff seats.

Cardiff Central constituency has been under-sized for a number of years, and the Cardiff South and Penarth constituency is similarly over-sized, so the logical extension of the current Cardiff Central constituency with the addition of the Rumney and Llanrumney wards is sensible.

The Commission rightfully recognise existing community links already within Cardiff Central:

#### Cathays and Plasnewydd

Cathays and Plasnewydd have many community ties, and are the two primary wards where the significant student population from Cardiff University, Cardiff Metropolitan University and the Cardiff campus of the University of South Wales lives.

The community connections across Cathays, Plasnewydd, Penylan, and parts of Cyncoed are such that residents in all three electoral wards consider themselves part of the Roath community around the district shopping areas of Crwys Rd, Albany Rd and City Rd. This is similarly recognised by the Local Authority in its district shopping area plans. These community links, including the public transport links out of the City centre, are long-standing and are respected by the Commission's proposals.

The children at primary schools in Cathays and Plasnewydd mainly attend Cathays High School, Bro Edern (Penylan) or Cardiff High School (Cyncoed).

#### Plasnewydd /Roath and Penylan

Many residents of Penylan/Plasnewydd see themselves as living in Roath, and recognise Roath rather than their electoral ward names. The place name "Roath" is

well established. It is seen on school names, Roath Park Primary School, and on our landmark geographical features such as Roath Recreation Ground, “The Rec.” which is in Plasnewydd ward.

Penylan residents look towards the Albany Road and Wellfield Road shopping districts in Plasnewydd. Their children attend Cathays High School/Cardiff High School, travelling through Plasnewydd’s main thoroughfares on their journeys to school.

#### Penylan and Cyncoed

Penylan residents, and parts of Cyncoed see themselves as living in Roath and the place name “Roath” is very well established through landmark geographical features such as Roath Park/Roath Lake, both within the Cyncoed ward. Residents look to Albany Road and Wellfield Road for shopping and other amenities.

#### Rumney and Llanrumney

The Commission’s proposed inclusion of Rumney and Llanrumney within Cardiff Central builds on both wards already having very good and well-established transport links to the existing Cardiff Central constituency. Newport Road is the main road from Llanrumney, through Rumney, through both Penylan and Adamsdown and into Cathays. Rumney and Llanrumney are wards with deep and extensive local ties to each other. The school catchment areas for Llanrumney and Rumney are inter-linked at Eastern High school.

#### Counter- Proposals

Having read the counter-proposals I don’t believe they represent better solutions and outline the areas within each proposal that fail to meet the factors outlined in Rule 5, Schedule 2 of the Act, which states that the following factors may be considered as the Commission develops proposals

- special geographical considerations, including, in particular, the size, shape and
- accessibility of a constituency
- local government boundaries that existed or were prospective on 1 December 2020
- boundaries of existing constituencies
- any ‘local ties’ that would be broken by changes in constituencies
- the inconveniences attendant on such changes.

#### Conservative Party Counter Proposal

The inclusion of Riverside ward to Cardiff Central makes no sense and offers no compelling reasoning. it is an inferior proposal to the Commission’s one. It fails to meet rule 5 criteria in terms of existing constituencies and geographical considerations by splitting off a Cardiff West ward located on the west of the River Taff.

Riverside ward is not only physically separated from the city centre (Cathays ward) by the River Taff and Bute Park, it is also very different in character. The city centre consists mainly of commercial non-domestic properties with limited residential



apartments. Riverside is mainly residential and extends a long way west from the river.

Riverside's close ties to Canton mean it's indistinguishable to residents, with a joint social focus on the district shopping area of Cowbridge Road East. Splitting these two wards ignores these significant local ties. Riverside covers large parts of the area that local residents would regard as Canton, ending as it does at Leckwith and Llandaff Roads. Where Canton and Riverside wards meet on Cowbridge Road East is the place local residents regard as the heart of the Canton community.

Riverside and Canton are home to a unique number of Welsh speakers. Children from Riverside ward overwhelmingly attend schools in the west of the city. At secondary level predominantly they attend Fitzalan High School (Canton Ward), the Welsh medium Ysgol Gyfun Plasmawr (Fairwater), and Church in Wales Bishop of Llandaff Church in Wales School (Llandaff).

Moving the Rumney and Llanrumney wards into two different constituencies again ignores the significant local ties between the wards. The school catchment areas for Llanrumney and Rumney are inter-linked at Eastern High school.

There are no meaningful links between Llanrumney and Pontprennau & Old St Mellons. The limited transport links prevents any community links, and the proposal to move the wards of Llanrumney and Rumney into different constituencies is contrary to Rule 5 and respecting local ties.

This counter-proposal also involves a total of three electoral wards within Cardiff moving from their current constituencies; compared to the two wards affected by the Commission's Initial Proposals.

#### Liberal Democrat Counter Proposal

These counter proposal involves moving a significantly higher number of wards between existing constituencies in Cardiff. Returning Rumney/Llanrumney to Cardiff South and adding Gabalfa/Heath to Cardiff Central severs existing strong local ties.

Gabalfa is closely linked to Llandaff North, with the Gabalfa Estate straddling these two wards. The shopping district of Merthyr Road in Whitchurch brings together the communities of Whitchurch and Gabalfa.

Heath borders Llanishen, with close community ties, good transport links, shared school catchment areas, services and amenities such as Llanishen Lesiure Centre, Cardiff Lifestyle Park, Sports Clubs, Community Centres, and parks. The close proximity of schools such as Ton Yr Ywen (Heath) are attended by many children living in Llanishen.

#### Summary

Rule 5 in Schedule 2 of the Act specifies a number of factors that the Commission may take into account.

#### Boundaries of existing constituencies

The Conservative counter proposals move three wards from existing constituencies.

The Lib Dem counter proposals move five wards into different constituencies.

Both of these proposals are a worse solution to the Commission's initial proposals, which only moves two wards.

#### Any 'local ties' that would be broken by changes in constituencies

As outlined above, the 'local ties' impacted by the Conservative counter-proposal are significant in regards to the impact of their proposals on Riverside, Llandaff North and Llanrumney.

The 'local ties' impacted by the Liberal Democrats' proposal are significant in relation to Gabalfa, Heath, Llanrumney, Radyr and Pentyrch.

Both of these proposals are a worse solution to the Commission's initial proposals, with the Lib Dem proposals being significantly worse for the reasons set out above.

#### Conclusion

While there are some concerns about the links between Trowbridge and Splott in the initial set of proposals, the various counterproposals (as set out above) all have greater failings in adhering to the statutory factors contained in Rule 5, Schedule 2.

The Commission should reject the counter proposals.

The Commission's proposals meet both the electoral quota as defined by the Act but are also the least disruptive proposals based both on the statutory factors and special geographical considerations within the Act.

**BCW-10190/ [REDACTED] Gabalfa, Whitchurch and Tongwynlais Branch  
Labour Party/ Cardiff**

By email: bcw@boundaries.wales

March 2022

Dear Commission

I am writing as the Secretary of Gabalfa, Whitchurch and Tongwynlais Branch Labour Party and resident of Gabalfa for 25 years.

I am also a director of the Our Mynachdy Community charity that runs the Mynachdy Community Centre. This community centre was built by and for the Mynachdy Welfare Association – set up in the 1920s for the residents of Cardiff's first council housing estate. That estate was bisected by Western Avenue but its residents retain close ties of family and friendship that are now incapsulated in membership and support for Our Mynachdy Community. Gabalfa's Libdem councillors and Llandaff North's Labour ones worked together with Anna and Julie and the city council to secure the newly revived community centre.

This submission relates to the Commission's Initial Proposals for Cardiff North and I will briefly reference the three other adjoining seats in Cardiff – Cardiff Central, Cardiff West and Cardiff South and Penarth. This submission also addresses the counter-proposals put forward during the consultation period relating to Cardiff North.

I largely welcome the Initial Proposals for the constituency of Cardiff North which would see the constituency remain largely intact, with the addition of Taff's Well. I do, however, feel that the coherence of the boundaries of Cardiff County Council and its four parliamentary/Senedd seats has been a major factor in the effective representation of the people of Cardiff, and especially Cardiff North. I know very well how important the work of the case workers of Anna McMorrin MP and Julie Morgan MS has been in securing help for residents and how it has dovetailed with that of our local councillors.

I also welcome the Initial Proposals made for Cardiff West, Cardiff Central and Cardiff South and Penarth which, as a whole, would entail just two wards within Cardiff moving constituency. Appreciating that Cardiff Central is under-sized and Cardiff South and Penarth is over-sized, the proposal to add Rumney and Llanrumney wards to Cardiff Central is sensible and welcome.

The proposal to keep Cardiff North whole with the addition of Taff's Well acknowledges the geographical links with the natural boundary of the Taff River and given good transport links between Taff's Well and the north of Cardiff, Taff's Well would seem a natural addition to the constituency.

The counter-proposal put forward by the Conservative Party does not recognise or respect the existing and longstanding community links in Cardiff North. Llandaff North and Whitchurch feel very connected as communities. The two wards share amenities, schools, green spaces and public transport links. Llandaff North looks to Whitchurch as its main shopping district.

The natural boundary of the Taff River separates Llandaff North from Llandaff in Cardiff West which has few transport links and no sense of connection to each other. The two communities on opposite sides of the river have little in common other than in name and so the proposal to move Llandaff North to Cardiff West is neither sensible nor does it recognise the existing local ties.

Moving Llandaff North to Cardiff West would unjustly amplify the damage done to Mynachdy when Western Avenue was built and one of the oldest housing estates in Wales, the first in Cardiff was cut through by a motorway.

Gabalfa, Llandaff North and Whitchurch and Heath are all linked and accessed via the Gabalfa roundabout which is the natural route-way for pedestrians and cyclists, particularly when going to and from Heath Hospital as patients or as health workers and students. That route-way is now to be reinforced with plans for the new Gabalfa Metro station on Mynachdy Coalyard. This will be the next stop after Llandaf (in Llandaff North) and a further reflection of the communities of Cardiff North being the eastern bank of the Taff. Linking Llandaff North to Llandaff flies in the face of nature and history.

There is also no natural connection between Cardiff North and Trowbridge. This counter-proposal ignores the significant local ties between the wards of Llandaff North, Gabalfa and Whitchurch and the subsequent limited transport links between Trowbridge and north Cardiff. This proposal ignores the local ties that must be recognised under Rule 5 Schedule 2 of the Act.

The counter-proposal that would see Gabalfa and the Heath move to Cardiff Central also fails to take into consideration the strong local ties that exist in these wards. As neighbouring wards, the Heath is closely tied to Llanishen in transport, school catchment areas, leisure centres, the Cardiff Lifestyle Park, sports clubs, community centres, green spaces and much more, but Llanishen would stay within Cardiff North, creating an illogical and unnatural separation.

In conclusion, I support the Boundary Commission's Initial Proposals and reject the counter proposals as set out above. The Boundary Commission's proposals are respectful of local ties and are the least disruptive in nature, only proposing to move two wards in Cardiff instead of three or five as set out in the counter-proposals.

Thank you for giving this your consideration.

Your sincerely,





BCW-10191/ [REDACTED] Merthyr Tydfil County Borough Council/ Merthyr Tydfil

**From:** [REDACTED]  
**Sent:** 29 March 2022 11:36  
**To:** BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>  
**Subject:** FW: Parliamentary Boundary Review - Merthyr Tydfil [NOT PROTECTIVELY MARKED]

Good morning,  
We were late submitting a response for the first consultation round, so just wanted to resubmit the comment returned by the Independent Group:

- **Cabinet and the Independent Group at Merthyr Tydfil CVC support the changes but suggest that they should go further; increasing the northern boundary up to the Beacons Reservoir on the Taff Fawr and to Torpantau / Neuadd Reservoir on the Taff Fechan.**

Regards

[REDACTED]  
**Gwasanaethau Democrataidd / Democratic Services**

BCW-10192/ [REDACTED] / Cardiff

From: [REDACTED]

Sent: 29 March 2022 11:38

To: BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>

Cc: [REDACTED]

Subject: Cardiff West - Boundary Commission

**Sent on behalf of Cllr Iona Gordon, Cllr Kanaya Singh, Cllr Caro Wild –  
councillors for Riverside ward, and Labour candidate for Riverside Ward,**  
[REDACTED]

As the representatives (and one potential representative) for the Riverside ward, we are strongly opposed to the Welsh Conservatives' suggestion to remove Riverside from the Boundary Commission's proposed Cardiff West constituency.

Riverside ward has very close social, economic and cultural links with the western side of Cardiff, predominantly the Canton and Llandaff wards. Our communities are so interlinked that most residents are would not be aware of where each ward starts and ends. By contrast, the River Taff creates a very clear geographic boundary to the east of the Riverside ward, separating us from the city centre which has a very different character.

The main shopping district for both Riverside and Canton residents is Cowbridge Road East, which runs through both wards. Many of the popular hospitality and cultural venues are similarly shared between the two wards. Additionally, Llandaff Fields, despite its name, sits within the Riverside ward and is equally well-used by residents of Riverside, Canton and Llandaff.

Children living in the Riverside ward almost always attend secondary school in the wards of Canton (Fitzalan High School), Fairwater (Ysgol Gyfun Gymraeg Plasmawr), Llandaff (Bishop of Llandaff High School) and Radyr (Radyr Comprehensive School). The catchment areas for some local primary schools also cross the Canton-Riverside boundary, most notably children from Riverside attending Welsh medium primary will almost certainly attend Ysgol Gymraeg Pwll Coch in Canton as there is no Welsh-medium primary school in Riverside ward.

The conservative proposals would lead to some minor residential roads becoming a major constituency boundary, this would certainly lead to confusion over democratic accountability and associated governance issues. The existing boundary, the river Taff, is just about as clear and natural a boundary as you could find.

These factors illustrate the case for Riverside's place in Cardiff West to be maintained alongside Canton and Llandaff, and to maintain a clear geographic boundary between constituencies using the River Taff, in keeping with the criteria set out in the Parliamentary Constituencies Act.

Thank you for reading this email.

This submission will comment on the Commission's initial proposals, the counterproposals and their compliance with the statutory factors in section 3.4 of the Commission's Guide to the 2023 Review.

Rule 5 in Schedule 2 of the Act specifies that the following factors may be considered as the Commission develops proposals

- special geographical considerations, including, in particular, the size, shape and
- accessibility of a constituency
- local government boundaries that existed or were prospective on 1 December 2020
- boundaries of existing constituencies
- any 'local ties' that would be broken by changes in constituencies
- the inconveniences attendant on such changes.

This Boundary Review and its proposals are limited by the requirement to meet the Electoral Quota (EQ) framework and the number of electors on the register as December 2020. My submission is therefore restrained by that.

### **Initial Proposals**

I welcome the Commission's initial proposals for the constituency of Cardiff Central as a resident. Equally I welcome the proposals that have been made for Cardiff North, Cardiff West and Cardiff South and Penarth.

The typically large electorates of wards in Cardiff do reduce the number of options available to the Commission. Given that the Cardiff Central constituency is under-sized and the Cardiff South and Penarth constituency is over-sized, the logical extension of the current Cardiff Central constituency with the addition of the Rumney and Llanrumney wards is sensible and is therefore welcomed.

I would add that the Commission is right to recognise areas with existing community links already within Cardiff Central:

### **Cathays and Plasnewydd**

Cathays and Plasnewydd have many community ties. They are overwhelmingly the two primary wards where the very substantial student population from Cardiff University, Cardiff Metropolitan University and the Cardiff campus of the University of South Wales lives. The secondary school catchment area for Cathays High School includes parts of Plasnewydd.

The community connections across Cathays, Plasnewydd and indeed Penylan and parts of Cyncoed are such that residents in all three electoral wards consider themselves part of the Roath community around the shopping districts of Crwys Rd, Albany Rd and City Rd. These community links, including the public transport links out of the City centre, are long-standing and are correctly respected by the Commission's initial proposals.

The children at primary schools in Cathays and Plasnewydd attend Cathays High School, Bro Edern (situated in Penylan) or Cardiff High School (situated in Cyncoed).

### Plasnewydd /Roath and Penylan

Many residents of Penylan and Plasnewydd consider themselves to be part of the Roath community and the place name “Roath” is very well established and understood. It is seen on school names, Roath Park Primary School, and on our landmark geographical features such as Roath Recreation Ground, “The Rec.” which is in the Plasnewydd ward.

The electors of Penylan look towards the shopping district of Albany Road and Wellfield Road in Plasnewydd. The children at primary schools in Penylan attend Cathays High School travelling along Albany Road and Crwys Road main thoroughfares on their journeys to school.

### Penylan and Cyncoed

Many residents of Penylan and parts of Cyncoed consider themselves to be part of the Roath community and the place name “Roath” is very well established and understood. It is seen on our landmark geographical features such as Roath Park and Roath Park Lake, both geographically being within the Cyncoed ward. Residents of both wards look to Albany Road and Wellfield Road particularly for their shopping and other amenities.

### Rumney and Llanrumney

The Commission’s proposed inclusion of Rumney and Llanrumney within Cardiff Central builds on both wards already having very good and well-established transport links, both road and public transport, to the existing Cardiff Central constituency. Newport Road is the main road from Llanrumney, through Rumney, through both Penylan and Adamsdown and into Cathays. Rumney and Llanrumney are wards with deep and extensive local ties to each other. The school catchment areas for Llanrumney and Rumney are inter-linked at Eastern High school. The main recreation area, is the Rumney Recreation Ground, situated in Llanrumney.

### **Counter- Proposals**

Several counterproposals relating to Cardiff Central and the adjoining three Cardiff constituencies have been made. Having read the counter-proposals, I suggest that they do not represent better solutions and I outline below, the areas within each proposal that fail to meet the factors outlined in Rule 5, Schedule 2 of the Act.

### **Conservative Party Counter Proposal**

This suggests (without any apparent compelling reasoning) removing Riverside ward, which is situated on the west of the River Taff, from the Cardiff West constituency and adding it to the Cardiff Central constituency.

It is difficult to discern any logic in these proposals in comparison with the Commission’s initial proposal, which meets rule 5 criteria in terms of existing constituencies and geographical considerations by retaining the whole of the current Cardiff West seat located on the west of the River Taff.

Riverside ward is in fact very different in character to the city centre (Cathays ward), all of which is on the east of the Taff. The city centre consists mainly of commercial properties (shops, restaurants, bars, offices, the stadium, the castle, the railway station etc) with some city centre apartments.

Riverside ward is mainly residential and despite its name extends a long way from the immediate vicinity of the river. South Riverside is one of Wales's most diverse areas, with very close local ties to neighbouring Canton with the district shopping area of Cowbridge Road East (which is also the main bus route) forming a spine linking the 2 wards.

Most local people go to shop along Cowbridge Road rather than the city centre. In fact the Riverside ward covers large parts of the area which most local residents would regard as Canton, ending as it does at Leckwith and Llandaff Roads. Where Canton and Riverside wards meet near the historic crossroads on Cowbridge Road East is the place local residents regard as the heart of the Canton community.

The Pontcanna part adds to Riverside ward's unique diversity by being the home to a large number Welsh speakers as increasingly is neighbouring Canton. Children from Riverside ward overwhelmingly attend schools in the west of the city. At secondary level predominantly they attend the highly diverse Fitzalan High School (Canton Ward), the Welsh medium Ysgol Gyfun Plasmawr (Fairwater), and Church in Wales Bishop of Llandaff Church in Wales School (Llandaff).

In practice there are very few community links across the river, as the residential areas of Riverside and the Cardiff Central residential areas are separated, not only by the very significant geographical presence of the River Taff, but by the commercial city centre, the civic centre, and large swathes of park land.

This counter proposal also involves moving the Rumney and Llanrumney wards into two different constituencies. This again ignores the significant local ties between the wards. The school catchment areas for Llanrumney and Rumney are inter-linked at Eastern High school.

This proposal moves Llanrumney into a revised Cardiff North constituency. There are no particularly strong links between Llanrumney and Pontprennau & Old St Mellons. Indeed, the transport links are extremely limited between Llanrumney and Cardiff North. In practice there are no particularly strong community links at all between these two wards, and the proposal to move the wards of Llanrumney and Rumney into different constituencies is completely contrary to Rule 5 and respecting local ties.

This counter-proposal also involves a total of three electoral wards within Cardiff moving from their current constituencies; compared to the two wards affected by the Commission's Initial Proposals.

### **Liberal Democrat Counter Proposal**

The Liberal Democrats' counter proposal involves moving a significantly higher number of wards between existing constituencies in Cardiff. This counter-proposal, which returns Rumney and Llanrumney to Cardiff South and adds Gabalfa and the Heath to Cardiff Central again fails to take into account the strong local ties that exist.

The Gabalfa ward is very closely linked into the Llandaff North ward. Indeed, the Gabalfa Estate, one of the oldest housing estates in Wales, straddles these two wards. The Gabalfa roundabout brings together the communities of Whitchurch and Gabalfa. Residents in both Gabalfa and Llandaff North look towards the shopping district of Merthyr Road in Whitchurch.

The Heath ward borders the Llanishen ward. The two communities are closely tied, not just by transport links, but by school catchment areas, services and amenities. Given the close proximity of schools such as Ton Yr Ywen in Heath, many children living close by in Llanishen attend. The two wards have good transport links, with a train line running through. Both wards share access to amenities such as Llanishen Lesiure Centre, Cardiff Lifestyle Park, Sports Clubs, Community Centres, green spaces and much more.

### **Summary**

Rule 5 in Schedule 2 of the Act specifies a number of factors that the Commission may take into account.

### **Boundaries of existing constituencies**

The initial proposals from the Commission move two wards from existing constituencies.

The counter proposals from the Conservatives move three.

The counter proposals from the Liberal Democrats move five wards within Cardiff into a different constituency.

Neither of these proposals are a better solution than the Commission's initial proposals. In fact, both are a worse solution.

### **Any 'local ties' that would be broken by changes in constituencies**

As is outlined above, the 'local ties' impacted by the Conservative counter-proposal are significant in regards to the impact of their proposals on Riverside, Llandaff North and Llanrumney.

The 'local ties' impacted by the Liberal Democrats' proposal are significant in relation to Gabalfa, Heath, Llanrumney, Radyr and Pentyrch.

Neither of these proposals are a better solution than the Commission's initial proposals. In fact, both are a worse solution with the Liberal Democrats' solution being significantly worse for the reasons set out above.

### **Conclusion**

I accept that there are some concerns about the links between Trowbridge and Splott in the initial set of proposals. However, as set out above, the various counterproposals all have greater failings in adhering to the statutory factors contained in Rule 5, Schedule 2.

I therefore submit that the Commission should reject the counter proposals.

The Commission's proposals for the four parliamentary constituencies in Cardiff meet both the electoral quota as defined by the Act but are also the least disruptive proposals based both on the statutory factors and special geographical considerations within the Act.



I'm commenting on the Commission's initial proposals, counterproposals and referencing their compliance with the statutory factors in section 3.4 of the Commission's Guide to the 2023 Review.

This Boundary Review and its proposals are limited by the requirement to meet the Electoral Quota (EQ) framework and the number of electors on the register as December 2020. My submission is therefore notes that the electoral register for an area like Cardiff Central is fluid, and does not necessarily reflect the actual population, due to the 'churn' caused by the number of students and young people living in this area.

#### Initial Proposals

I support the Commission's initial proposals for the constituency of Cardiff Central as a local councillor. Equally I welcome the proposals that have been made for the other Cardiff seats.

Cardiff Central constituency has been under-sized for a number of years, and the Cardiff South and Penarth constituency is similarly over-sized, so the logical extension of the current Cardiff Central constituency with the addition of the Rumney and Llanrumney wards is sensible.

The Commission rightfully recognise existing community links already within Cardiff Central:

#### Cathays and Plasnewydd

Cathays and Plasnewydd have many community ties, and are the two primary wards where the significant student population from Cardiff University, Cardiff Metropolitan University and the Cardiff campus of the University of South Wales lives.

The community connections across Cathays, Plasnewydd, Penylan, and parts of Cyncoed are such that residents in all three electoral wards consider themselves part of the Roath community around the district shopping areas of Crwys Rd, Albany Rd and City Rd. This is similarly recognised by the Local Authority in its district shopping area plans. These community links, including the public transport links out of the City centre, are long-standing and are respected by the Commission's proposals.

The children at primary schools in Cathays and Plasnewydd mainly attend Cathays High School, Bro Edern (Penylan) or Cardiff High School (Cyncoed).

#### Plasnewydd /Roath and Penylan

Many residents of Penylan/Plasnewydd see themselves as living in Roath, and recognise Roath rather than their electoral ward names. The place name "Roath" is

well established. It is seen on school names, Roath Park Primary School, and on our landmark geographical features such as Roath Recreation Ground, “The Rec.” which is in Plasnewydd ward.

Penylan residents look towards the Albany Road and Wellfield Road shopping districts in Plasnewydd. Their children attend Cathays High School/Cardiff High School, travelling through Plasnewydd’s main thoroughfares on their journeys to school.

#### Penylan and Cyncoed

Penylan residents, and parts of Cyncoed see themselves as living in Roath and the place name “Roath” is very well established through landmark geographical features such as Roath Park/Roath Lake, both within the Cyncoed ward. Residents look to Albany Road and Wellfield Road for shopping and other amenities.

#### Rumney and Llanrumney

The Commission’s proposed inclusion of Rumney and Llanrumney within Cardiff Central builds on both wards already having very good and well-established transport links to the existing Cardiff Central constituency. Newport Road is the main road from Llanrumney, through Rumney, through both Penylan and Adamsdown and into Cathays. Rumney and Llanrumney are wards with deep and extensive local ties to each other. The school catchment areas for Llanrumney and Rumney are inter-linked at Eastern High school.

#### Counter- Proposals

Having read the counter-proposals I don’t believe they represent better solutions and outline the areas within each proposal that fail to meet the factors outlined in Rule 5, Schedule 2 of the Act, which states that the following factors may be considered as the Commission develops proposals

- special geographical considerations, including, in particular, the size, shape and
- accessibility of a constituency
- local government boundaries that existed or were prospective on 1 December 2020
- boundaries of existing constituencies
- any ‘local ties’ that would be broken by changes in constituencies
- the inconveniences attendant on such changes.

#### Conservative Party Counter Proposal

The inclusion of Riverside ward to Cardiff Central makes no sense and offers no compelling reasoning. it is an inferior proposal to the Commission’s one. It fails to meet rule 5 criteria in terms of existing constituencies and geographical considerations by splitting off a Cardiff West ward located on the west of the River Taff.

Riverside ward is not only physically separated from the city centre (Cathays ward) by the River Taff and Bute Park, it is also very different in character. The city centre consists mainly of commercial non-domestic properties with limited residential

apartments. Riverside is mainly residential and extends a long way west from the river.

Riverside's close ties to Canton mean it's indistinguishable to residents, with a joint social focus on the district shopping area of Cowbridge Road East. Splitting these two wards ignores these significant local ties. Riverside covers large parts of the area that local residents would regard as Canton, ending as it does at Leckwith and Llandaff Roads. Where Canton and Riverside wards meet on Cowbridge Road East is the place local residents regard as the heart of the Canton community.

Riverside and Canton are home to a unique number of Welsh speakers. Children from Riverside ward overwhelmingly attend schools in the west of the city. At secondary level predominantly they attend Fitzalan High School (Canton Ward), the Welsh medium Ysgol Gyfun Plasmawr (Fairwater), and Church in Wales Bishop of Llandaff Church in Wales School (Llandaff).

Moving the Rumney and Llanrumney wards into two different constituencies again ignores the significant local ties between the wards. The school catchment areas for Llanrumney and Rumney are inter-linked at Eastern High school.

There are no meaningful links between Llanrumney and Pontprennau & Old St Mellons. The limited transport links prevents any community links, and the proposal to move the wards of Llanrumney and Rumney into different constituencies is contrary to Rule 5 and respecting local ties.

This counter-proposal also involves a total of three electoral wards within Cardiff moving from their current constituencies; compared to the two wards affected by the Commission's Initial Proposals.

#### Liberal Democrat Counter Proposal

These counter proposal involves moving a significantly higher number of wards between existing constituencies in Cardiff. Returning Rumney/Llanrumney to Cardiff South and adding Gabalfa/Heath to Cardiff Central severs existing strong local ties.

Gabalfa is closely linked to Llandaff North, with the Gabalfa Estate straddling these two wards. The shopping district of Merthyr Road in Whitchurch brings together the communities of Whitchurch and Gabalfa.

Heath borders Llanishen, with close community ties, good transport links, shared school catchment areas, services and amenities such as Llanishen Lesiure Centre, Cardiff Lifestyle Park, Sports Clubs, Community Centres, and parks. The close proximity of schools such as Ton Yr Ywen (Heath) are attended by many children living in Llanishen.

#### Summary

Rule 5 in Schedule 2 of the Act specifies a number of factors that the Commission may take into account.

#### Boundaries of existing constituencies

The Conservative counter proposals move three wards from existing constituencies.

The Lib Dem counter proposals move five wards into different constituencies.

Both of these proposals are a worse solution to the Commission's initial proposals, which only moves two wards.

#### Any 'local ties' that would be broken by changes in constituencies

As outlined above, the 'local ties' impacted by the Conservative counter-proposal are significant in regards to the impact of their proposals on Riverside, Llandaff North and Llanrumney.

The 'local ties' impacted by the Liberal Democrats' proposal are significant in relation to Gabalfa, Heath, Llanrumney, Radyr and Pentyrch.

Both of these proposals are a worse solution to the Commission's initial proposals, with the Lib Dem proposals being significantly worse for the reasons set out above.

#### Conclusion

While there are some concerns about the links between Trowbridge and Splott in the initial set of proposals, the various counterproposals (as set out above) all have greater failings in adhering to the statutory factors contained in Rule 5, Schedule 2.

The Commission should reject the counter proposals.

The Commission's proposals meet both the electoral quota as defined by the Act but are also the least disruptive proposals based both on the statutory factors and special geographical considerations within the Act.

**BCW-10195/ [REDACTED] / Cardiff**

**From:** [REDACTED]

**Sent:** 29 March 2022 12:06

**To:** BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>

**Subject:** Response to Wales Boundary Commissioner Review

Dear Commission

I am writing as a resident of Whitchurch in the Cardiff North constituency. This submission relates to the Commission's Initial Proposals for Cardiff North and I will briefly reference the three other adjoining seats in Cardiff – Cardiff Central, Cardiff West and Cardiff South and Penarth. This submission also addresses the counter-proposals put forward during the consultation period relating to Cardiff North.

I welcome the Initial Proposals for the constituency of Cardiff North which would see the constituency remain largely intact, with the addition of Taff's Well. I also welcome the Initial Proposals made for Cardiff West, Cardiff Central and Cardiff South and Penarth which, as a whole, would entail just two wards within Cardiff moving constituency. Appreciating that Cardiff Central is under-sized and Cardiff South and Penarth is over-sized, the proposal to add Rumney and Llanrumney wards to Cardiff Central is sensible and welcome.

The proposal to keep Cardiff North whole with the addition of Taff's Well acknowledges the geographical links with the natural boundary of the Taff River and given good transport links between Taff's Well and the north of Cardiff, Taff's Well would seem a natural addition to the constituency.

The counter-proposal put forward by the Conservative Party does not recognise or respect the existing and longstanding community links in Cardiff North. Llandaff North and Whitchurch feel very connected as communities. The two wards share amenities, schools, green spaces and public transport links. Llandaff North looks to Whitchurch as its main shopping district.

The natural boundary of the Taff River separates Llandaff North from Llandaff in Cardiff West which has few transport links and no sense of connection to each other. The two communities on opposite sides of the river have little in common other than in name and so the proposal to move Llandaff North to Cardiff West is neither sensible nor does it recognise the existing local ties. Moving Llandaff North to Cardiff West would also halve one of the oldest housing estates in Wales. Mynachdy is partly in Gabalfa. Gabalfa, Llandaff North and Whitchurch are all linked and accessed via the Gabalfa roundabout.

There is also no natural connection between Cardiff North and Trowbridge. This counter-proposal ignores the significant local ties between the wards of Llandaff North, Gabalfa and Whitchurch and the subsequent limited transport links between Trowbridge and north Cardiff. This proposal ignores the local ties that must be recognised under Rule 5 Schedule 2 of the Act.

The counter-proposal that would see Gabalfa and the Heath move to Cardiff Central also fails to take into consideration the strong local ties that exist in these wards. As neighbouring wards, the Heath is closely tied to Llanishen in transport, school catchment areas, leisure centres, the Cardiff Lifestyle Park, sports clubs, community centres, green spaces and much more, but Llanishen would stay within Cardiff North, creating an illogical and unnatural separation.

In conclusion, I support the Boundary Commission's Initial Proposals and reject the counter proposals as set out above. The Boundary Commission's proposals are respectful of local ties and are the least disruptive in nature, only proposing to move two wards in Cardiff instead of three or five as set out in the counter-proposals.

Thank you for giving this your consideration.

Your sincerely,

A black rectangular redaction box covering the signature of the sender.



**BCW-10196/** [REDACTED] **/ Cardiff**

**From:** [REDACTED]  
**Sent:** [REDACTED] arch 2022 13:07  
**To:** BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>  
**Subject:** Boundary proposals Cardiff North constituency

Dear Commission,

I am writing as a local resident living in Cardiff North. My submission concerns the current proposals and alternative suggestions for the composition of constituency parliamentary boundaries for communities in Cardiff North.

The initial proposal for Cardiff North, which leaves the constituency of Cardiff North largely unaltered from the current arrangement, seems to protect the relationships that exist between communities in the north of Cardiff and provides a largely coherent constituency to which local residents can relate.

I would like to express concerns at a couple of the alternative arrangements proposed which neither recognise the links between different communities in Cardiff North nor appear to help in the construction of a sensible and balanced constituency map for Cardiff as a whole.

The proposal to separate Llandaff North from its neighbours of Whitchurch and Gabalfa wards presents an illogical and unnecessary move, given the very close relationship between the three wards in terms of transport links, schooling, shopping and other social and economic activity. The suggestion to partner Llandaff North with territory the other side of the Taff River fails to recognise the lack of natural links or transport routes between the communities on either side of the river, and would have the affect of breaking the long held relationship with neighbouring communities.

A further proposal which suggests that Heath and Gabalfa should move to Cardiff Central fails to recognise the interrelated connectivity of neighbourhoods currently at the centre of Cardiff North constituency, particularly Llanishen, Rhiwbina, Whitchurch and Heath. The proposal to break up this partnership of communities seems to offer little in return apart from a less coherent Cardiff North constituency.

I hope the commission is prepared to consider community relationships as they exist across the current constituency, and hesitates to break long established and valuable linkages to no great gain.

Kind regards

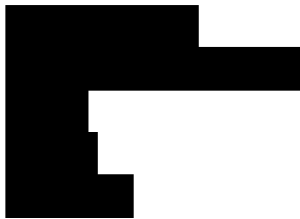
[REDACTED]

BCW-10197/[REDACTED] / Cardiff

**From:** [REDACTED]  
**Sent:** 29 March 2022 13:13  
**To:** BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>  
**Subject:** Response to proposals

Please find attached my response to the proposed boundary changes.

By email: [bcw@boundaries.wales](mailto:bcw@boundaries.wales)



29 March 2022

To whom it may concern,

I am writing as a local resident of the Heath area of Cardiff.

This submission relates to the Commission's Initial Proposals for Cardiff North and I will briefly reference the three other adjoining seats in Cardiff – Cardiff Central, Cardiff West and Cardiff South and Penarth. This submission also addresses the counter-proposals put forward during the consultation period relating to Cardiff North.

I welcome the Initial Proposals for the constituency of Cardiff North which would see the constituency remain largely intact, with the addition of Taff's Well. I also welcome the Initial Proposals made for Cardiff West, Cardiff Central and Cardiff South and Penarth which, as a whole, would entail just two wards within Cardiff moving constituency. Appreciating that Cardiff Central is under-sized and Cardiff South and Penarth is over-sized, the proposal to add Rumney and Llanrumney wards to Cardiff Central is sensible and welcome.

The proposal to keep Cardiff North whole with the addition of Taff's Well acknowledges the geographical links with the natural boundary of the Taff River and given good transport links between Taff's Well and the north of Cardiff, Taff's Well would seem a natural addition to the constituency.

The counter-proposal put forward by the Conservative Party does not recognise or respect the existing and longstanding community links in Cardiff North.

Llandaff North and Whitchurch feel very connected as communities. The two wards share amenities, schools, green spaces and public transport links. Llandaff North looks to Whitchurch as its main shopping district.

The natural boundary of the Taff River separates Llandaff North from Llandaff in Cardiff West which has few transport links and no sense of connection to each other. The two communities on opposite sides of the river have little in common other than in name and so the proposal to move Llandaff North to Cardiff West is neither sensible nor does it recognise the existing local ties. Moving Llandaff North to Cardiff West would also halve one of the oldest housing estates in Wales. Mynachdy is partly in Gabalfa. Gabalfa, Llandaff North and Whitchurch are all linked and accessed via the Gabalfa roundabout.

There is also no natural connection between Cardiff North and Trowbridge. This counter- proposal ignores the significant local ties between the wards of Llandaff North, Gabalfa and Whitchurch and the subsequent limited transport links between Trowbridge and north Cardiff. This proposal ignores the local ties that must be recognised under Rule 5 Schedule 2 of the Act.

I am also very concerned about the counter-proposal that would see Gabalfa and the Heath move to Cardiff Central as it also fails to take into consideration the strong local ties that exist in these wards. As neighbouring wards, the Heath is closely tied to Llanishen in transport, school catchment areas, leisure centres, the Cardiff Lifestyle Park, sports clubs, community centres, green spaces and much more, but Llanishen would stay within Cardiff North, creating an illogical and unnatural separation.

We share local schools and community facilities, and the proposal would cause havoc in our local area. I can only think that the idea came from people who have no idea of the actual communities in question.

In conclusion, I support the Boundary Commission's Initial Proposals and reject the counter proposals as set out above. The Boundary Commission's proposals are respectful of local ties and are the least disruptive in nature, only proposing to move two wards in Cardiff instead of three or five as set out in the counter-proposals.

Thank you for giving this your consideration.

Your sincerely,

A large black rectangular redaction box covering the signature and name of the sender. Below it is a smaller black rectangular redaction box, likely covering a title or contact information.

BCW-10198/ [REDACTED] South Riverside Community Development  
Centre/ Cardiff

**From:** [REDACTED]  
**Sent:** 29 March 2022 13:31  
**To:** BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>  
**Cc:** [REDACTED]

**Subject:** Re: FW: Urgent - deadline Weds, 30th March, 11.59pm

To whom it may concern:

Re: Public Consultation in relation to the proposed changes to UK Parliament  
constituency boundaries

Dear Sir or Madam,

I am writing to you with regard to the public consultation currently being run by the Boundary Commission for Wales, gathering the views of members of the public, local organisations and political representatives in relation to the proposed changes to UK Parliament constituency boundaries, which will take effect from 2023.

As the Chair of Trustees of South Riverside Community Development Centre, based Riverside within the constituency of Cardiff West, I wanted to **oppose** the suggestion proposed by the Welsh Conservative Party which, if implemented, would mean the whole of the Riverside ward being shifted out of Cardiff West into the Cardiff Central constituency.

We believe, this change would impact negatively impact our organisation established for the purpose of benefiting the communities in the Riverside, Canton and Grangetown areas. These areas in our view have similar needs in terms of support and services and would be in better place if kept under current constituencies together. There are also geographical factors to consider (the River Taff) and close local links between Riverside, Grangetown and Canton.

Yours sincerely,

[REDACTED]

Chair of Trustees, South Riverside Community Development Centre

**BCW-10199/ Stephen Crabb MP/ Preseli Pembrokeshire**

**From:** [REDACTED]

**Sent:** 29 March 2022 16:30

**To:** Enquiries <[enquiries@boundaries.wales](mailto:enquiries@boundaries.wales)>; BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>

**Subject:** Submission from Stephen Crabb MP

Good Afternoon,

Please find attached Stephen Crabb MP's submission for consideration.

I would be grateful if you are able to acknowledge its receipt.

Kind regards,

[REDACTED]

**Executive Office Manager**

**Office of the Rt. Hon. Stephen Crabb MP / Y Gwir Anrh. w Stephen Crabb AS**

**Member of Parliament for Preseli Pembrokeshire / Aelod Seneddol Preseli Penfro**





**Rt Hon Stephen Crabb MP**  
Member of Parliament for Preseli Pembrokeshire

29<sup>th</sup> March 2022

Shereen Williams  
Secretary of the Commission  
Boundary Commission for Wales  
Ground Floor, Hastings House  
Fitzalan Court  
Cardiff  
CF24 0BL

Dear Shereen,

I am unable to attend the public hearing in Aberystwyth on 30<sup>th</sup> March 2022 which I had arranged due a recent operation which prevents me from travelling at this time. I do hope that this written submission can be accepted in its place.

I would like to support the current proposal for Maenclochog to remain as part of the Mid and South Pembrokeshire Constituency. I am confident that this is consistent with the majority of individuals living within the division since the 2013 review of Parliamentary Boundaries in Wales was first initiated.

As you may be aware, I have consulted with members of the division in 2013, and 2018 and again in 2022. At the beginning of February this year I sent a survey out to all households in the division so that opinions could be sought once again about the changes to the Parliamentary boundaries. The responses received showed 77% want to remain within the Mid and South Pembrokeshire Parliamentary boundary, 14% don't mind which seat they are represented by, and 9% want to be included within the new Ceredigion Preseli seat.

I would like to reiterate that the vast majority of opinion is that Maenclochog is better suited to being a core part of the Mid and South Pembrokeshire Parliamentary seat. I am pleased that the Boundary Commission accepted this opinion and position in 2018 and I can confirm that the consensus of opinion is still relevant and meaningful today.

Although North Pembrokeshire has been included with Ceredigion in a Parliamentary constituency in the past (pre-1997), the Maenclochog Division has always been part of the principal Pembrokeshire seat reflecting the fact that the communities it serves are very much in the heart of Pembrokeshire and have few social, historical and cultural links to Ceredigion.

Unlike many communities in North Pembrokeshire, those living in this division do not look to Cardigan as the principal town for the services they use. The majority of residents can easily access Haverfordwest by public transport, both bus and train. It is the main town for personal administration, banking and commercial purposes. In contrast, there are no bus or rail links connecting the communities of Maenclochog to Cardigan.

Whilst it is true that much of North Pembrokeshire regards the Cardigan-based Tivyside Advertiser as its main newspaper, this paper does not have wide circulation in Maenclochog where the Haverfordwest-

**Constituency Office:**





**Rt Hon Stephen Crabb MP**

Member of Parliament for Preseli Pembrokeshire



based Western Telegraph and Milford Haven based Pembrokeshire Herald are overwhelmingly the main local newspapers of choice.

I believe that this community will be isolated if it is merged into the Preseli Ceredigion constituency for the reasons detailed above and is the view also shared by the Independent County Councillor, Huw George, who has represented the area since 2006. During a recent conversation Cllr George said, *"I support the retention of Maenclochog division remaining in the Mid and South Pembrokeshire parliamentary seat. The community which I represent is closely aligned with Mid and South Pembrokeshire. It shares more similarities and characteristics and I believe strongly that should this division be changed into the Preseli Ceredigion Parliamentary seat it would be detrimental to the social and cultural fabric of this community."*

Thank you for considering my representation confirming why the Commission is correct to retain Maenclochog within the proposals for Mid and South Pembrokeshire.

Kind regards,



**Rt Hon Stephen Crabb MP**

**Constituency Office:**



**BCW-10200/ Cllr Dilwar Ali/ Llandaf North**

**From:** [REDACTED]  
**Sent:** 29 March 2022 22:50  
**To:** BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>  
**Cc:** [REDACTED]  
**Subject:** Commission's Initial Proposals for Cardiff North

By email: [bcw@boundaries.wales](mailto:bcw@boundaries.wales)

29 March 2022

Dear Commission,

I am writing as a local resident and councillor for Llandaff North. This submission relates to the Commission's Initial Proposals for Cardiff North and I will briefly reference the three other adjoining seats in Cardiff – Cardiff Central, Cardiff West and Cardiff South and Penarth. This submission also addresses the counter-proposals put forward during the consultation period relating to Cardiff North.

I welcome the Initial Proposals for the constituency of Cardiff North which would see the constituency remain largely intact, with the addition of Taff's Well. I also welcome the Initial Proposals made for Cardiff West, Cardiff Central and Cardiff South and Penarth which, as a whole, would entail just two wards within Cardiff moving constituency. Appreciating that Cardiff Central is under-sized and Cardiff South and Penarth is over-sized, the proposal to add Rumney and Llanrumney wards to Cardiff Central is sensible and welcome.

The proposal to keep Cardiff North whole with the addition of Taff's Well acknowledges the geographical links with the natural boundary of the Taff River and given good transport links between Taff's Well and the north of Cardiff, Taff's Well would seem a natural addition to the constituency.

The counter-proposal put forward by the Conservative Party does not recognise or respect the existing and longstanding community links in Cardiff North. Llandaff North and Whitchurch feel very connected as communities. The two wards share amenities, schools, green spaces and public transport links. Llandaff North looks to Whitchurch as its main shopping district.

The natural boundary of the Taff River separates Llandaff North from Llandaff in Cardiff West which has few transport links and no sense of connection to each other. The two communities on opposite sides of the river have little in common other than in name and so the proposal to move Llandaff North to Cardiff West is neither sensible nor does it recognise the existing local ties. Moving Llandaff North to Cardiff West would also halve one of the oldest housing estates in Wales. Mynachdy is partly in Gabalfa. Gabalfa, Llandaff North and Whitchurch are all linked and accessed via the Gabalfa roundabout.

There is also no natural connection between Cardiff North and Trowbridge. This counter-proposal ignores the significant local ties between the wards of Llandaff North, Gabalfa and Whitchurch and the subsequent limited transport links between Trowbridge and north Cardiff. This proposal ignores the local ties that must be recognised under Rule 5 Schedule 2 of the Act.

The counter-proposal that would see Gabalfa and the Heath move to Cardiff Central also fails to take into consideration the strong local ties that exist in these wards. As neighbouring wards, the Heath is closely tied to Llanishen in transport, school catchment areas, leisure centres, the Cardiff Lifestyle Park, sports clubs, community centres, green spaces and much more, but Llanishen would stay within Cardiff North, creating an illogical and unnatural separation.

In conclusion, I support the Boundary Commission's Initial Proposals and reject the counter proposals as set out above. The Boundary Commission's proposals are respectful of local ties and are the least disruptive in nature, only proposing to move two wards in Cardiff instead of three or five as set out in the counter-proposals.

Thank you for giving this your consideration.

Your sincerely,

Dilwar Ali  
Local Resident and Councillor for Llandaff North  
Email: [REDACTED]

This submission will comment on the Commission's initial proposals, the counterproposals and their compliance with the statutory factors in section 3.4 of the Commission's Guide to the 2023 Review.

Rule 5 in Schedule 2 of the Act specifies that the following factors may be considered as the Commission develops proposals

- special geographical considerations, including, in particular, the size, shape and
- accessibility of a constituency
- local government boundaries that existed or were prospective on 1 December 2020
- boundaries of existing constituencies
- any 'local ties' that would be broken by changes in constituencies
- the inconveniences attendant on such changes.

This Boundary Review and its proposals are limited by the requirement to meet the Electoral Quota (EQ) framework and the number of electors on the register as December 2020. My submission is therefore restrained by that.

### **Initial Proposals**

I welcome the Commission's initial proposals for the constituency of Cardiff Central as a resident. Equally I welcome the proposals that have been made for Cardiff North, Cardiff West and Cardiff South and Penarth.

The typically large electorates of wards in Cardiff do reduce the number of options available to the Commission. Given that the Cardiff Central constituency is under-sized and the Cardiff South and Penarth constituency is over-sized, the logical extension of the current Cardiff Central constituency with the addition of the Rumney and Llanrumney wards is sensible and is therefore welcomed.

I would add that the Commission is right to recognise areas with existing community links already within Cardiff Central:

### **Cathays and Plasnewydd**

Cathays and Plasnewydd have many community ties. They are overwhelmingly the two primary wards where the very substantial student population from Cardiff University, Cardiff Metropolitan University and the Cardiff campus of the University of South Wales lives. The secondary school catchment area for Cathays High School includes parts of Plasnewydd.

The community connections across Cathays, Plasnewydd and indeed Penylan and parts of Cyncoed are such that residents in all three electoral wards consider themselves part of the Roath community around the shopping districts of Crwys Rd, Albany Rd and City Rd. These community links, including the public transport links out of the City centre, are long-standing and are correctly respected by the Commission's initial proposals.

The children at primary schools in Cathays and Plasnewydd attend Cathays High School, Bro Edern (situated in Penylan) or Cardiff High School (situated in Cyncoed).

### Plasnewydd /Roath and Penylan

Many residents of Penylan and Plasnewydd consider themselves to be part of the Roath community and the place name “Roath” is very well established and understood. It is seen on school names, Roath Park Primary School, and on our landmark geographical features such as Roath Recreation Ground, “The Rec.” which is in the Penylan ward.

The electors of Penylan look towards the shopping district of Albany Road and Wellfield Road in Plasnewydd. The children at primary schools in Penylan attend Cathays High School travelling along Albany Road and Crwys Road main thoroughfares on their journeys to school.

### Penylan and Cyncoed

Many residents of Penylan and parts of Cyncoed consider themselves to be part of the Roath community and the place name “Roath” is very well established and understood. It is seen on our landmark geographical features such as Roath Park and Roath Park Lake, both geographically being within the Cyncoed ward. Residents of both wards look to Albany Road and Wellfield Road particularly for their shopping and other amenities.

### Rumney and Llanrumney

The Commission’s proposed inclusion of Rumney and Llanrumney within Cardiff Central builds on both wards already having very good and well-established transport links, both road and public transport, to the existing Cardiff Central constituency. Newport Road is the main road from Llanrumney, through Rumney, through both Penylan and Adamsdown and into Cathays. Rumney and Llanrumney are wards with deep and extensive local ties to each other. The school catchment areas for Llanrumney and Rumney are inter-linked at Eastern High school. The main recreation area, is the Rumney Recreation Ground, situated in Llanrumney.

### **Counter- Proposals**

Several counterproposals relating to Cardiff Central and the adjoining three Cardiff constituencies have been made. Having read the counter-proposals and listened to the oral evidence and questions and answers relating to them at the Commission’s hearing in Cardiff on Thursday 17<sup>th</sup> February 2022, I suggest that they do not represent better solutions and I outline below, the areas within each proposal that fail to meet the factors outlined in Rule 5, Schedule 2 of the Act.

### **Conservative Party Counter Proposal**

This suggests (without any apparent compelling reasoning) removing Riverside ward, which is situated on the west of the River Taff, from the Cardiff West constituency and adding it to the Cardiff Central constituency.

It is difficult to discern any logic in these proposals in comparison with the Commission’s initial proposal, which meets rule 5 criteria in terms of existing constituencies and geographical considerations by retaining the whole of the current Cardiff West seat located on the west of the River Taff.

Riverside ward is in fact very different in character to the city centre (Cathays ward), all of which is on the east of the Taff. The city centre consists mainly of commercial properties

(shops, restaurants, bars, offices, the stadium, the castle, the railway station etc) with some city centre apartments.

Riverside ward is mainly residential and despite its name extends a long way from the immediate vicinity of the river. South Riverside is one of Wales's most diverse areas, with very close local ties to neighbouring Canton with the district shopping area of Cowbridge Road East (which is also the main bus route) forming a spine linking the 2 wards.

Most local people go to shop along Cowbridge Road rather than the city centre. In fact the Riverside ward covers large parts of the area which most local residents would regard as Canton, ending as it does at Leckwith and Llandaff Roads. Where Canton and Riverside wards meet near the historic crossroads on Cowbridge Road East is the place local residents regard as the heart of the Canton community.

The Pontcanna part adds to Riverside ward's unique diversity by being the home to a large number Welsh speakers as increasingly is neighbouring Canton. Children from Riverside ward overwhelmingly attend schools in the west of the city. At secondary level predominantly they attend the highly diverse Fitzalan High School (Canton Ward), the Welsh medium Ysgol Gyfun Plasmawr (Fairwater), and Church in Wales Bishop of Llandaff Church in Wales School (Llandaff).

In practice there are very few community links across the river, as the residential areas of Riverside and the Cardiff Central residential areas are separated, not only by the very significant geographical presence of the River Taff, but by the commercial city centre, the civic centre, and large swathes of park land.

This counter proposal also involves moving the Rumney and Llanrumney wards into two different constituencies. This again ignores the significant local ties between the wards. The school catchment areas for Llanrumney and Rumney are inter-linked at Eastern High school.

This proposal moves Llanrumney into a revised Cardiff North constituency. There are no particularly strong links between Llanrumney and Pontprenhau & Old St Mellons. Indeed, the transport links are extremely limited between Llanrumney and Cardiff North. In practice there are no particularly strong community links at all between these two wards, and the proposal to move the wards of Llanrumney and Rumney into different constituencies is completely contrary to Rule 5 and respecting local ties.

This counter-proposal also involves a total of three electoral wards within Cardiff moving from their current constituencies; compared to the two wards affected by the Commission's Initial Proposals.

### **Liberal Democrat Counter Proposal**

The Liberal Democrats' counter proposal involves moving a significantly higher number of wards between existing constituencies in Cardiff. This counter-proposal, which returns Rumney and Llanrumney to Cardiff South and adds Gabalfa and the Heath to Cardiff Central again fails to take into account the strong local ties that exist.



The Gabalfa ward is very closely linked into the Llandaff North ward. Indeed, the Gabalfa Estate, one of the oldest housing estates in Wales, straddles these two wards. The Gabalfa roundabout brings together the communities of Whitchurch and Gabalfa. Residents in both Gabalfa and Llandaff North look towards the shopping district of Merthyr Road in Whitchurch.

The Heath ward borders the Llanishen ward. The two communities are closely tied, not just by transport links, but by school catchment areas, services and amenities. Given the close proximity of schools such as Ton Yr Ywen in Heath, many children living close by in Llanishen attend. The two wards have good transport links, with a train line running through. Both wards share access to amenities such as Llanishen Lesiure Centre, Cardiff Lifestyle Park, Sports Clubs, Community Centres, green spaces and much more.

### **Summary**

Rule 5 in Schedule 2 of the Act specifies a number of factors that the Commission may take into account.

### **Boundaries of existing constituencies**

The initial proposals from the Commission move two wards from existing constituencies.

The counter proposals from the Conservatives move three.

The counter proposals from the Liberal Democrats move five wards within Cardiff into a different constituency.

Neither of these proposals are a better solution than the Commission's initial proposals. In fact, both are a worse solution.

### **Any 'local ties' that would be broken by changes in constituencies**

As is outlined above, the 'local ties' impacted by the Conservative counter-proposal are significant in regards to the impact of their proposals on Riverside, Llandaff North and Llanrumney.

The 'local ties' impacted by the Liberal Democrats' proposal are significant in relation to Gabalfa, Heath, Llanrumney, Radyr and Pentyrch.

Neither of these proposals are a better solution than the Commission's initial proposals. In fact, both are a worse solution with the Liberal Democrats' solution being significantly worse for the reasons set out above.

### **Conclusion**

I accept that there are some concerns about the links between Trowbridge and Splott in the initial set of proposals. However, as set out above, the various counterproposals all have greater failings in adhering to the statutory factors contained in Rule 5, Schedule 2.

I therefore submit that the Commission should reject the counter proposals.

The Commission's proposals for the four parliamentary constituencies in Cardiff meet both the electoral quota as defined by the Act but are also the least disruptive proposals based both on the statutory factors and special geographical considerations within the Act.

BCW-10202/ [REDACTED] / Mayals

**From:** [REDACTED]  
**Sent:** 29 March 2022 17:11  
**To:** BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>  
**Subject:** Parliamentary Boundary Commission

Good afternoon

I am writing to you today to show my support the Boundary Commission proposals for the new Swansea West and Gower Constituency.

Mayals should be in the new constituency and its links to Mumbles and that it is an integral part of the Mumbles Community Council.

Kind regards

[REDACTED]

Mayals resident

Responses need to be made by the 30th March by e-mail to:  
[bcw@boundaries.wales](mailto:bcw@boundaries.wales)

Thanks,

[REDACTED]

PS I attach my notes which might help.

# 2023 Review of Parliamentary constituencies

Secondary Consultation:  
Official response from The Labour Party

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Wales



This representation should be read in conjunction with the submission made during the Initial Consultation (Rep. 10049), and the Party's oral presentations to the public hearings in Cardiff and Aberystwyth. Our submissions to the process are the formal position of The Labour Party and Welsh Labour as agreed by the National Executive Committee (NEC) of UK Labour alongside representatives from the Welsh Executive Committee (WEC). This followed an extensive consultation process within The Labour Party involving all our members of Parliament, Constituency Labour Parties (CLPs) and members.

The Labour Party has considered the submissions made by others during the Initial Consultation Period as well as the representations made to the public hearings in Wales. The formal position of the party remains as set out in our own statements and we would urge the Commission to consider and accept the arguments made there, both where we are in support of their own proposals and where we make counter proposals. We believe them to represent a scheme which balances the statutory criteria and creates a sustainable pattern of constituencies in Wales which can provide effective representation for its communities.

We are aware however that others have made alternative proposals which they consider equally valid in respect of the rules and that the Commission has a difficult task in assessing their relative merits and then choosing between them. While we have as far as practicable considered all of them we do not refer to them all specifically within this representation. Many of the propose completely different patterns of constituencies and while they may contain aspects which have merit we would not support them because of their wider context. We have rather identified what we believe to be the key issues which have emerged in the representations, objections and counter proposals and the Labour Party's overall perspective from which the Commission will, we trust, be able to infer Labour's view on different proposals where we do not explicitly set them out.

Our submission will therefore summarise our own views of the many issues that have been raised and their strengths and weaknesses. They are presented in the context of our own previous arguments which we have set out and which, unless otherwise stated,

remain the same. We trust that this will be of use to the Commission in assessing the pros and cons of different proposals and what level of support each may have.

### **Pattern of Constituencies**

#### Brecon and Radnorshire

We set out in our previous representations what we believe to be the chief factors which determine the pattern of how 31 constituencies are distributed in mainland Wales, and specifically the seats which must combine parts of the more densely populated local authorities of South Wales and North East Wales with the sparsely populated areas of Mid Wales and West Wales which tend currently to have very low electorates. We agree with the Commission's proposals in this respect. Perhaps the most difficult of these issues is the enlargement of Brecon & Radnorshire CC, a huge rural constituency which shares a border with all the South Wales valleys. Any constituency which contains parts of both of these is likely to be an awkward arrangement. We believe that the advantage of the Commission's Initial Proposal to add the nine wards of Neath Port Talbot County Borough is that it links these areas with the one part of the Brecon & Radnorshire CC which has affinity with those valleys communities. The Upper Tawe Valley links seamlessly with Ystradgynlais and Ynyscedwyn by the A4067 and Ystalyfera has close ties with Ystradgynlais.

We regret that this proposal breaks ties within the Neath constituency but we are unable to identify any counter proposal which would not create greater disruption. We note the proposal of the Liberal Democrats for example which would create a seat combining parts of Bridgend, Neath Port Talbot and Swansea which we believe would lack any ties. We also note that the initial proposals in this area are supported by the Conservative Party and Fay Jones MP in 1993 and at the public hearings.

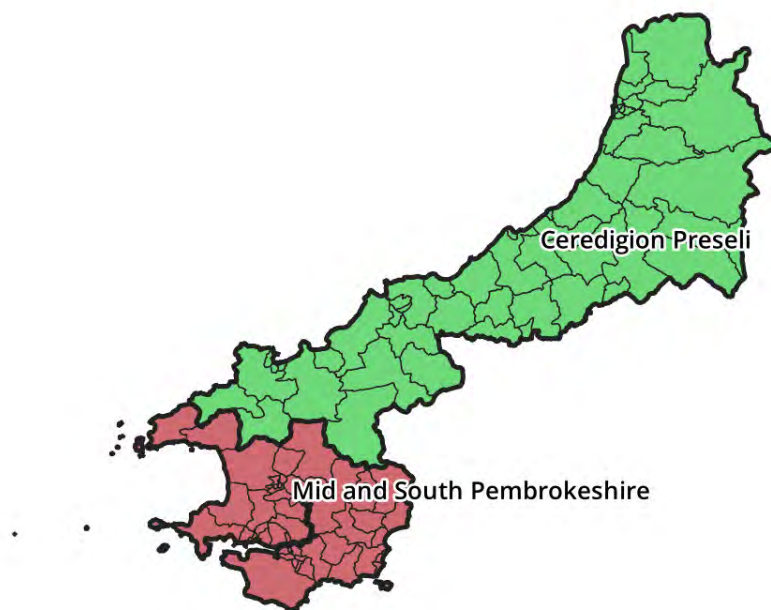
#### Ceredigion

We also agree with the Commission's proposal to extend the Ceredigion CC by once again adding the north of Pembrokeshire, an arrangement which was in place between 1983 and 1997. We believe this is obviously logical in that the whole constituency would be of similar character, dominated by coastal and rural communities.



We do make a counter proposal for the wards of St Davids and Solva to be within the Mid & South Pembrokeshire constituency and for Maenchlochog to be within Ceredigion Preseli CC. On balance we would argue that the ties of St Davids are stronger with the areas to the south and the local centre of Haverfordwest than they are with Fishguard and the north west coast of Pembrokeshire. We believe the arguments in respect of Letterston ward are less clear cut but we would have no objection were that ward also to be within the Mid & South Pembrokeshire CC as has been proposed by others. We note that Plaid Cymru propose the same arrangement in this area.

Our counter-proposal is detailed below (with Letterston remaining in Ceredigion Preseli):



Constituency and Electorate	Wards
<b>Ceredigion Preseli CC</b> <b>75,936</b>	County of <u>Ceredigion</u> County of <u>Pembrokeshire</u> wards of: Cilgerran, Clydau, Crymych, Dinas Cross, Fishguard North East, Fishguard North West, Goodwick, Letterston, Llanrhian, Maenclochog, Newport, Scloddau, St. Dogmaels

Constituency and Electorate	Wards
<b>Mid and South Pembrokeshire CC</b> <b>74,947</b>	County of <u>Pembrokeshire</u> wards of: Amroth, Burton, Camrose, Carew, East Williamston, Haverfordwest: Castle, Haverfordwest: Garth, Haverfordwest: Portfield, Haverfordwest: Prendergast., Haverfordwest: Priory, Hundleton, Kilgetty/Begelly, Lampeter Velfrey, Lamphey, Llangwm, Manorbier, Martletwy, Merlin's Bridge, Milford: Central, Milford: East, Milford: Hakin, Milford: Hubberston, Milford: North, Milford: West, Narberth, Narberth Rural, Neyland: East, Neyland: West, Pembroke Dock: Central, Pembroke Dock: Llanion, Pembroke Dock: Market, Pembroke Dock: Pennar, Pembroke: Monkton, Pembroke: St. Mary North, Pembroke: St. Mary South, Pembroke: St. Michael, Penally, Rudbaxton, Saundersfoot, Solva, St. David's, St. Ishmael's, Tenby: North, Tenby: South, The Havens, Wiston

### Monmouthshire and Torfaen

The two authorities of Monmouthshire and Torfaen each have electorates which conveniently are within five per cent of the Electoral Quota. The current Torfaen constituency is entirely contained within its borough and some 59,182 electors (88.2%) of the current Monmouth constituency are within Monmouthshire County, the rest being the remaining part of Torfaen. We would argue that the case is therefore almost unanswerable that under the rules the two local authorities and constituencies should each be coterminous. We therefore do not support the suggestion of Plaid Cymru that the town of Abergavenny should be included in Brecon & Radnor CC rather than the Upper Tawe Valley, the consequence of which is that the Torfaen constituency would be broken up with Cwmbran in a seat with Monmouth and Pontypool with Blaenau Gwent.

### Newport and Caerphilly

With Monmouthshire and Torfaen comprising whole constituencies, the current Newport East constituency must be wholly within the City and County of Newport and we believe that the Commission have chosen the most suitable six wards from the existing Newport West constituency with which to augment it, including Bettws which has strong ties to Malpas and is separated from the remainder of Newport West by the

M4 motorway. The proposed Newport East constituency is widely supported including by Jessica Morden MP.

We accept that there is then considerable controversy about which constituency to place the rest of the wards which are currently within Newport West and that there are arguments both ways. We believe that the Commission's Initial Proposals are a viable solution while acknowledging that there are few ties between Newport and Caerphilly and that the latter looks much more towards Cardiff. The proposed constituency would in that sense comprise two distinct parts but there would be reasonable internal communications within it.

We also accept that there are ties between Rogerstone and Risca in the Sirhowy Valley which might make it logical to create the new constituency in that area. However we believe that the counter proposal which has been made to that effect by Wayne David MP and especially that of the Liberal Democrats would result in the breaking of ties in the Islwyn constituency and particularly between Blackwood and Newbridge whereas the Initial Proposals for Islwyn CC create a compact seat in which 53,795 (95.2%) of the electors in the current constituency would remain within it. We believe this is a finely balanced choice but would not wish to oppose the Commission's Initial Proposals in this area.

We note there have been few objections to the proposed Blaenau Gwent & Rhymney CC and believe it is the obvious way of creating a new seat in this area, indeed if Torfaen is to be one whole constituency it is effectively the only one, and it is well supported by Nick Smith MP.

We do note that the ward of Nelson could be included within the Islwyn CC which would better respect local government boundaries and its ties to Ystrad Mynach but that the Commission's overall proposal for Cardiff requires that it be within the Merthyr Tydfil & Aberdare CC. We refer to this further below.

#### Cardiff, Merthyr Tydfil, Rhondda Cynon Taf and Vale of Glamorgan

We note that the proposals in this part of Wales arise from the Commission's solution to the need to amend constituencies in Cardiff where the area of the city plus Penarth has

an entitlement to just 3.74 constituencies. So while the city can retain four constituencies additional areas from other local authorities must be added to it.

We believe there is considerable logic in the Commission's decision to add the Dinas Powys ward to the Cardiff South & Penarth constituency and the Rhondda Cynon Taf wards of Taffs Well and Pont-y-Clun to the Cardiff North BC and Cardiff West BC respectively. All of them we believe have strong ties to Cardiff and partly function as commuter areas for the city. We believe for example that the argument that Dinas Powys should not be in Cardiff South & Penarth because it lacks ties to Penarth is spurious. It can fit well in that constituency because its ties to Cardiff are similar to those of Penarth and Sully and while we acknowledge it obviously has some ties to Barry as part of the same local authority, there is no problem we believe in its being in Cardiff South & Penarth which already contains much of the Vale of Glamorgan.

The benefit of the Initial Proposals is that they allow three of the four Cardiff constituencies to remain completely intact while just 14,377 electors (4.1%) in the city would change seat, which we believe is a remarkable statistic given the degree of change which is necessary within Wales as a whole. Furthermore, the only change to the Vale of Glamorgan CC would be the transfer of Dinas Powys with every single elector in the revised seat being part of that constituency already. The Rhondda CC would also remain intact and the revised seat wholly within the Rhondda Cynon Taf County Borough. We would refer the Commission in particular to the strong arguments in favour of the initial proposals in Cardiff presented by Jo Stevens MP at the Cardiff public hearing.

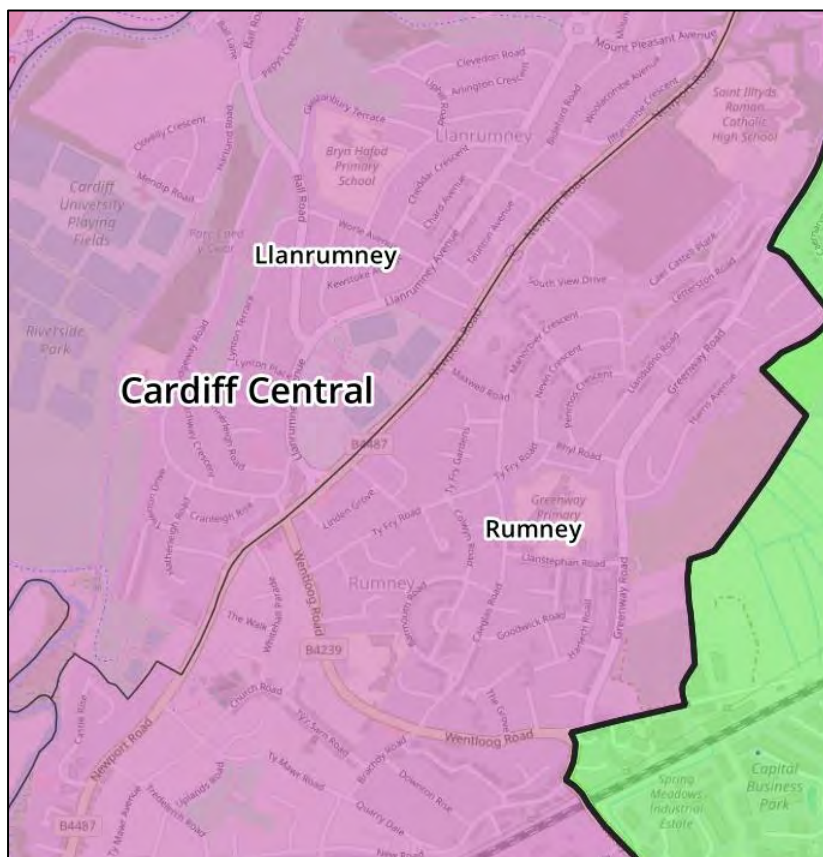
We accept that there are legitimate objections within the rules to the proposal for Nelson ward and the "orphan" wards of Taffs Well and Pont-y-Clun leaving Rhondda Cynon Taf divided between five different constituencies. However we believe these are relatively minor anomalies which are outweighed by the overall logic of the Commission's proposals for the eight constituencies in this part of Wales.

We also accept that the Trowbridge ward would effectively be a "detached part" within the Cardiff South & Penarth BC and that in practical terms there would be no road

access to it within the constituency. We do not believe that this would be a major problem within a relatively small urban area, but we accept that the Commission may feel it is a weakness of their proposal.

We believe again that the disadvantages of the proposal are outweighed by the advantages of the Initial Proposals as described above. Also, the Conservative counter proposal which seeks to address these issues has, we believe, major flaws. Crucially it would place the Llanrumney and Rumney wards in different constituencies which would break the strong ties between them (see map, showing the initial proposal position), a weakness which is also a feature of the Liberal Democrat counter proposal.

### **Llanrumney/Rumney wards**

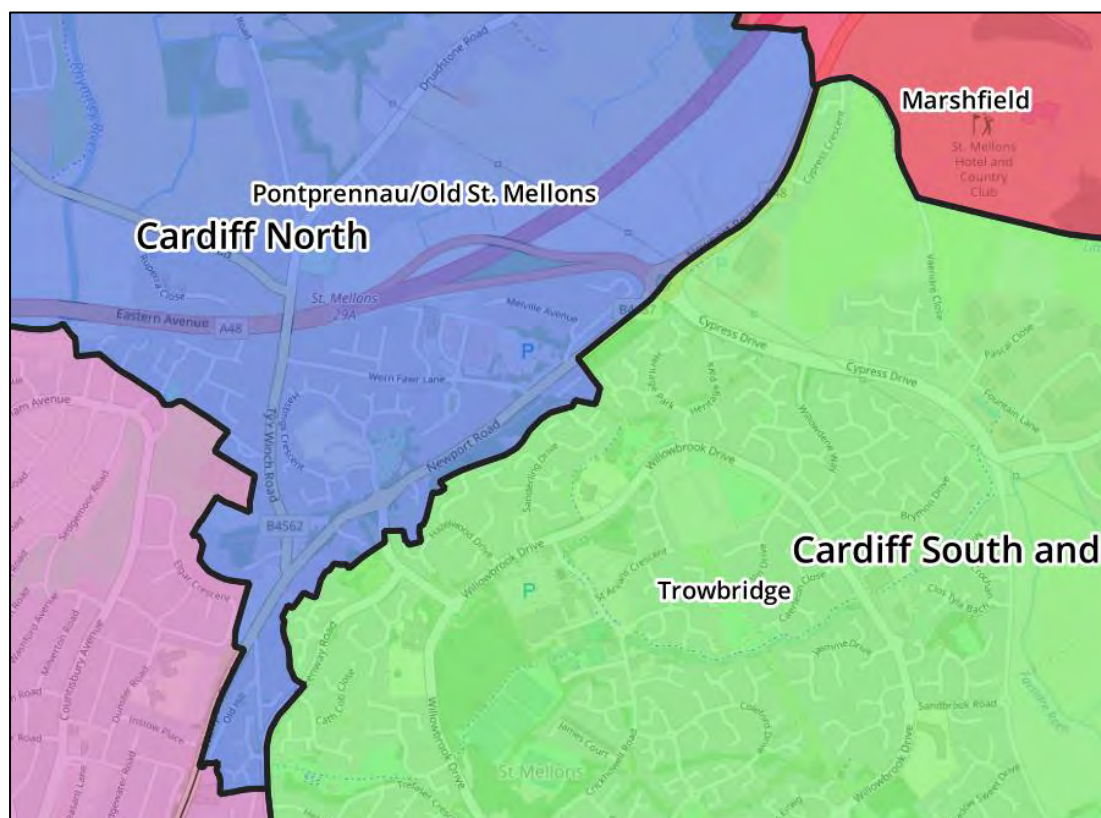


We believe that the significant consequential changes of transferring Llandaff North and Riverside wards from the constituencies in which they have resided for many years respectively east and west of the River Taff are also strong arguments against the proposal.



Were the Commission to accept the arguments of the Conservatives in respect of Nelson, Taffs Well, Pont-y-Clun and Trowbridge we would however argue that rather than adopt their counter proposal it should be amended to enable the Llanrumney and Rumney wards to remain in Cardiff South & Penarth respecting the ties between them, with Trowbridge transferred to Cardiff North BC. We note that Trowbridge has ties to Pontprennau/Old St Mellons, there being continuous residential development with part of St Mellons south and east of the A48 road (see map, showing the wards as they stand in the initial proposals).

### **Pontprennau/Old St Mellons and Trowbridge**



This counter proposal would also require Dinas Powys ward to be within Cardiff South & Penarth BC which, as we argue above, is a logical arrangement.

### Bridgend and Aberavon

We note that there is widespread agreement that the three existing constituencies of Aberavon, Bridgend and Ogmore must effectively be reconfigured into two new whole

seats. The Labour Party agrees with the Commission's proposals for the two seats of Bridgend CC and Aberafan Porthcawl CC. We believe it is logical to create the two seat using the major transportation corridors which obviously reflect the major geography of the area. That would respect the ties of Maesteg, the Llynfi Valley and Garw Valley with the town of Bridgend with Port Talbot being linked with Porthcawl in a constituency focused on the M4 and the coastal communities of the Severn Estuary. We would draw the Commission's attention to the written and oral submissions of Chris Elmore MP and Stephen Kinnock MP in respect of this area.

We recognise this would break the ties between Porthcawl and Bridgend, which have been in the same constituency for many years, but we feel that the major counter proposal which would place them in the same seat creates an unworkable constituency linking Aberavon and Maesteg, which runs against the main transportation links with the two parts linked only by minor roads across sparsely populated uplands. Again, we would refer to the submission of Chris Elmore MP at the Cardiff public hearing which set out some of the issues with this proposal.

We accept that there are ties between the two wards of Cefn Glas and Llangewydd & Brynhyfryd to the town of Bridgend and were the Commission to believe that those ties needed to be restored, we would commend the counter proposal of Chris Elmore MP and Stephen Kinnock MP, set out in their submissions to the Cardiff and Swansea hearings respectively, that the Cefn Cribwr ward could be included in Aberafan Porthcawl CC instead.

#### Neath and Swansea

As noted above, we regret the major changes to the Neath CC but believe that the transfer of the Upper Tawe Valley to Brecon & Radnor is the best available way of increasing the electorate of that constituency. This necessitates the creation of a seat comprising the rest of Neath plus the three Coedffranc wards from Aberavon with the east of Swansea, with two other seats wholly within the City of Swansea.

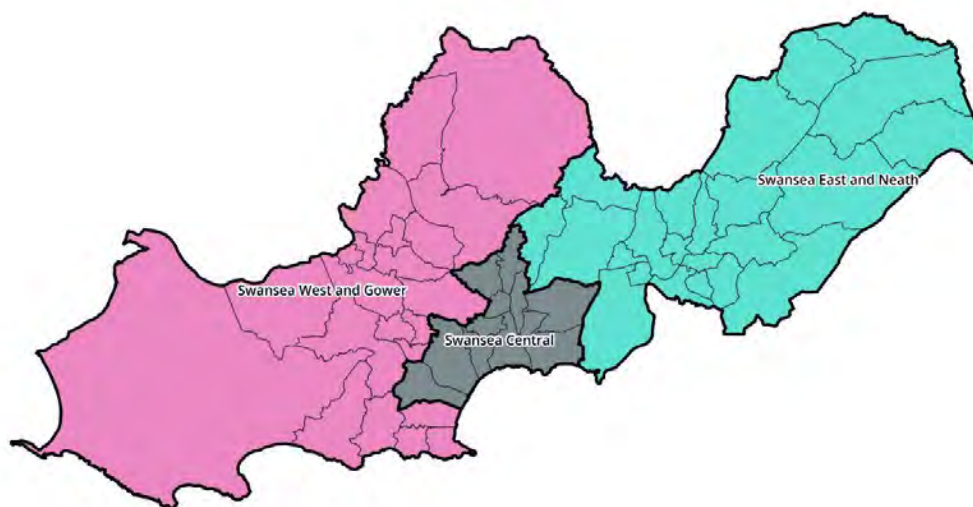
The Labour Party has made a counter proposal for these three seats and we set out our arguments in its favour in our previous oral and written representations which were



supported by other witnesses. Overall a total of 136,514 electors remain in their main successor constituency (90.8% of those in Gower, 69.6% of those in Neath and 69.9% of those in Swansea West) compared with 119,995 under the Initial Proposals under which Swansea West is the seat technically abolished and the proposed Swansea North & Central CC would contain more electors from Swansea East. We accept that the counter proposal perpetuates the split of the Mumbles Community Council between two constituencies but by respecting the existing constituency boundary this is still consistent with the statutory criteria.

We would draw the Commission's attention to written representation 9908 from Geraint Davies MP which makes compelling arguments under the statutory rules for our counter-proposal.

The detail of our counter-proposal is set out below:



Constituency and Electorate	Wards
<b>Swansea Central BC</b> <b>73,412</b>	City and County of <u>Swansea</u> wards of: Bonymaen, Castle, Cwmbwrla, Landore, Mayals, Mynyddbach, Penderry, St. Thomas, Sketty, Townhill, Uplands
<b>Swansea East and Neath CC</b> <b>76,841</b>	<u>Neath Port Talbot</u> County Borough wards of: Aberdulais, Blaengwrach, Bryn-coch North, Bryn-coch South, Cadoxton, Cimla, Coedffranc Central, Coedffranc North, Coedffranc West, Crynant, Dyffryn, Glynneath, Neath East, Neath North, Neath South, Onllwyn, Pelenna, Resolven, Seven Sisters, Tonna  City and County of <u>Swansea</u> wards of: Clydach, Llansamlet, Morriston
<b>Swansea West and Gower CC</b> <b>76,801</b>	City and County of <u>Swansea</u> wards of: Bishopston, Cockett Dunvant, Fairwood, Gorseinon, Gower, Gowerton, Killay North, Killay South, Kingsbridge, Llangyfelach, Lower Loughor, Mawr, Mayals, Newton, Oystermouth, Penclawdd, Penllergaer, Pennard, Penyrheol, Pontardulais, Upper Loughor, West Cross

### Carmarthenshire

We note the counter proposal which has been made for the Llangunnor ward to be within the Caerfyrddin CC and we accept that it has strong ties to the town of Carmarthen, as set out by several submissions to the public hearings. We would have no objection were the Commission to propose this revision to their Initial Proposals.

### Mid and North Wales

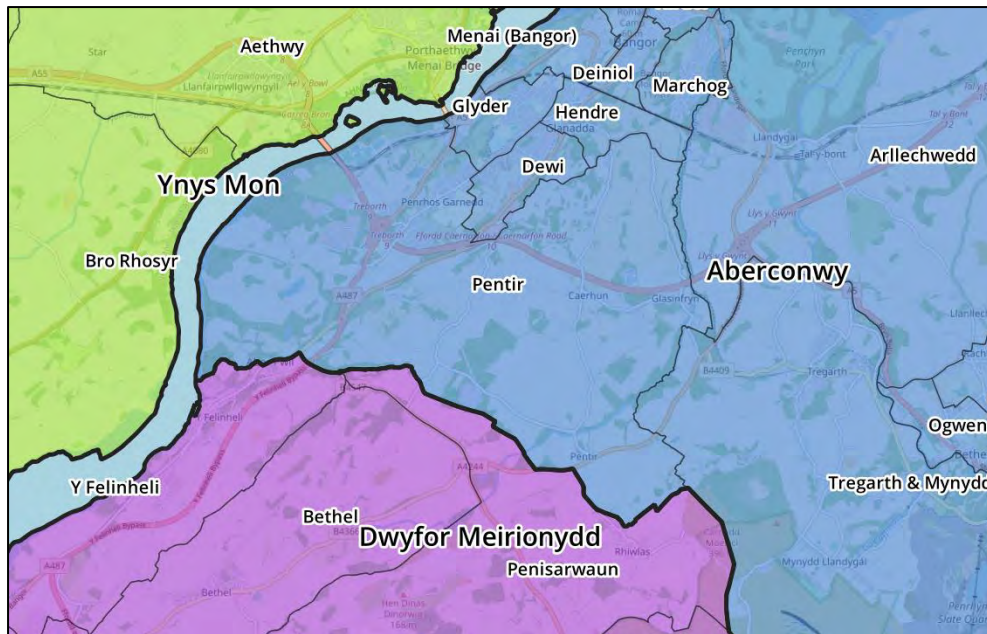
The changes which the Commission proposed to the Brecon & Radnor CC allow the boundary with Montgomeryshire to remain unchanged which the Labour Party supports. We very much welcome the generally incremental way in which the Commission has made changes to seats in North East Wales while accepting that the existing seats of Clwyd South and Vale of Clwyd must be among those which are technically abolished. We believe the Commission's proposals retain the integrity of the

main communities in those seats while minimising the numbers of electors moving seats.

So, every single elector in the current seats of Aberconwy, Alyn & Deeside, Montgomeryshire and Wrexham remain in the same constituency as do 88.2% of those in Delyn and 70.2% of those in Clwyd West. We believe these are considerable strengths and are clearly consistent with the statutory criteria. The proposed Montgomeryshire & Glyndwr CC and Clwyd CC are each comprised of electors from just two existing constituencies.

We do not believe that the relatively minor inconveniences of including two wards of Wrexham County Borough in the Alyn & Deeside constituency outweigh these benefits, especially as there is a history of such an arrangement with the Llay ward being part of Alyn & Deeside between 1983 and 1997. We also believe that the Argoed, Leeswood and New Brighton wards have ties to Buckley as well as to Mold. In contrast, the town of Flint and Bagillt have been part of Delyn CC since the seat's creation in 1983 and Flint is the currently largest town within it. We therefore do not support the Conservative counter proposal which while it does reduce the number of constituencies in Wrexham County Borough by one, achieves it through the creation of what we would argue is a disparate and illogical Delyn seat not including Flint but stretching as far south as Corwen and Llandrillo. The proposal would reduce the number of electors in Delyn constituency remaining in that renamed seat to 42,068 (76.9%) and the number remaining in Clwyd CC as successor to Clwyd West CC to 38,715 (67.0%). The Clwyd South CC would be divided between three new seats rather than two, breaking the ties between Corwen and Llangollen.

We support the proposals in North West Wales with every elector in Dwyfor Meirionnydd CC remaining in that constituency. We do note that there have been objections to the exclusion of the Pentir ward from Aberconwy CC and we accept that it has ties to the City of Bangor. We would therefore support a counter proposal which addressed this, given it could move to the proposed Aberconwy CC with no additional knock-on consequences. We note that this was supported by the Conservative Party at the Aberystwyth hearing, and also by the Liberal Democrats.



We would certainly not support the counter-proposal by Plaid Cymru in North West Wales, which creates an unnecessary four-authority seat they call Meirionnydd, Nant Conwy & Denbigh.

### Names and Designations of Constituencies

We do not wish to make any objections to the names proposed by the Commission and would generally urge that they should be kept as succinct as possible. While it is right that the Commission should adjust constituency names where there has been significant change, we do not believe that this process should be one of providing a description of the seat rather than simply a title which readily identifies the general area both to residents and to others who need to use it for whatever purpose.

We note a number of counter proposals have been made by others and in most cases we see no benefit to them. We believe that Montgomeryshire & Glyndwr CC is a much more concise name than Montgomeryshire & Clwyd South. We believe that Clwyd is a perfectly acceptable description which recognises the changes which have been made to the Clwyd West CC while the change of name of Delyn to Clwyd East we believe to be completely unnecessary if the Commission's proposals are retained.

We would on balance argue for Gower & Swansea West rather than Swansea West & Gower and Neath & Swansea East rather than Swansea East & Neath, recognising that in each case that is the major contributing existing constituency.

We note that the Conservative Party have proposed calling the proposed Aberconwy CC 'Aberconwy & Bangor CC'. We do not support this, however, as Bangor would not actually be the largest settlement in the constituency, and would support retaining the Aberconwy name.

Once the Revised Proposals are published, we will make more detailed comment on the names of constituencies as proposed at that time.

### Conclusion

We would like to thank the Commission once again for their work on the 2023 Review. We look forward to receiving and commenting upon the Revised Proposals when they are published.





**BCW-10204/ Jo Stevens MP/ Cardiff**

**From:** [REDACTED]  
**Sent:** 29 March 2022 16:55  
**To:** BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>  
**Subject:** Boundary Commission - Secondary Consultation Period

Dear Commissioners

Please see the attached submission

Please would you confirm receipt

Best wishes  
Jo



**Jo Stevens MP**

Member of Parliament for Cardiff Central

Shadow Secretary of State for Wales



HOUSE OF COMMONS

Boundary Commission for Wales  
Hastings House  
Cardiff  
CF24 0BL

**Via email**

29 March 2022

Dear Commissioners,

I refer to my earlier written submission BCW-10023 and to my oral evidence to the Commission's hearing in Cardiff on Thursday 17<sup>th</sup> February. This further written submission primarily responds to the counter proposals made to the Commission's Initial Proposals for Cardiff Central and the three adjoining Cardiff seats.

This submission will comment on the counterproposals and their compliance with the statutory factors in section 3.4 of the Commission's Guide to the 2023 Review.

Rule 5 in Schedule 2 of the Act specifies that the following factors may be considered as the Commission develops proposals

- special geographical considerations, including, in particular, the size, shape and
- accessibility of a constituency
- local government boundaries that existed or were prospective on 1 December 2020
- boundaries of existing constituencies
- any 'local ties' that would be broken by changes in constituencies
- the inconveniences attendant on such changes.

This Boundary Review and its proposals are limited by the requirement to meet the Electoral Quota (EQ) framework and the number of electors on the register as December 2020. My submission is therefore restrained by that.

### **Initial Proposals**

I have welcomed the Commission's initial proposals for the constituency of Cardiff Central. I do that both as the current Member of Parliament and as a resident. Equally I welcome the proposals that have been made for Cardiff North, Cardiff West and Cardiff South and Penarth.

The typically large electorates of wards in Cardiff do reduce the number of options available to the Commission. Given that the Cardiff Central constituency is under-sized and the Cardiff South and Penarth constituency is over-sized, the logical extension of

the current Cardiff Central constituency with the addition of the Rumney and Llanrumney wards is sensible and is therefore welcomed.

I would add that the Commission is right to recognise areas with existing community links already within Cardiff Central:

#### Cathays and Plasnewydd

Cathays and Plasnewydd have many community ties. They are overwhelmingly the two primary wards where the very substantial student population from Cardiff University, Cardiff Metropolitan University and the Cardiff campus of the University of South Wales lives.

The secondary school catchment area for Cathays High School includes parts of Plasnewydd.

The community connections across Cathays, Plasnewydd and indeed Penylan and parts of Cyncoed are such that residents in all three electoral wards consider themselves part of the Roath community around the shopping districts of Crwys Rd, Albany Rd and City Rd. These community links, including the public transport links out of the City centre, are long-standing and are correctly respected by the Commission's initial proposals.

The children at primary schools in Cathays and Plasnewydd attend Cathays High School, Bro Edern (situated in Penylan) or Cardiff High School (situated in Cyncoed).

#### Plasnewydd /Roath and Penylan

Many residents of Penylan and Plasnewydd consider themselves to be part of the Roath community and the place name "Roath" is very well established and understood. It is seen on school names, Roath Park Primary School, and on our landmark geographical features such as Roath Recreation Ground, "The Rec." which is in the Penylan ward.

The electors of Penylan look towards the shopping district of Albany Road and Wellfield Road in Plasnewydd. The children at primary schools in Penylan attend Cathays High School travelling along Albany Road and Crwys Road main thoroughfares on their journeys to school.

#### Penylan and Cyncoed

Many residents of Penylan and parts of Cyncoed consider themselves to be part of the Roath community and the place name "Roath" is very well established and understood. It is seen on our landmark geographical features such as Roath Park and Roath Park Lake, both geographically being within the Cyncoed ward. Residents of both wards look to Albany Road and Wellfield Road particularly for their shopping and other amenities.

#### Rumney and Llanrumney

The Commission's proposed inclusion of Rumney and Llanrumney within Cardiff Central builds on both wards already having very good and well-established transport links, both road and public transport, to the existing Cardiff Central constituency.



Newport Road is the main road from Llanrumney, through Rumney, through both Penylan and Adamsdown and into Cathays.

Rumney and Llanrumney are wards with deep and extensive local ties to each other. The school catchment areas for Llanrumney and Rumney are inter-linked at Eastern High school.

The main recreation area, and site of the former historic Llanrumney festival, is the Rumney Recreation Ground, situated in Llanrumney.

### **Counter- Proposals**

Several counterproposals relating to Cardiff Central and the adjoining three Cardiff constituencies have been made. Having read the counter-proposals and listened to the oral evidence and questions and answers relating to them at the Commission's hearing in Cardiff on Thursday 17<sup>th</sup> February. I suggest that they do not represent better solutions and I outline below, the areas within each proposal that fail to meet the factors outlined in Rule 5, Schedule 2 of the Act.

### **Conservative Party Counter Proposal**

This suggests (without any apparent compelling reasoning) removing Riverside ward, which is situated on the west of the River Taff, from the Cardiff West constituency and adding it to the Cardiff Central constituency.

It is difficult to discern any logic in these proposals in comparison with the Commission's initial proposal, which meets rule 5 criteria in terms of existing constituencies and geographical considerations by retaining the whole of the current Cardiff West seat located on the west of the River Taff.

Riverside ward is in fact very different in character to the city centre (Cathays ward), all of which is on the east of the Taff. The city centre consists mainly of commercial properties (shops, restaurants, bars, offices, the stadium, the castle, the railway station etc) with some city centre apartments.

Riverside ward is mainly residential and despite its name extends a long way from the immediate vicinity of the river. South Riverside is one of Wales's most diverse areas, with very close local ties to neighbouring Canton with the district shopping area of Cowbridge Road East (which is also the main bus route) forming a spine linking the 2 wards.

Most local people go to shop along Cowbridge Road rather than the city centre. In fact the Riverside ward covers large parts of the area which most local residents would regard as Canton, ending as it does at Leckwith and Llandaff Roads. Where Canton and

Riverside wards meet near the historic crossroads on Cowbridge Road East is the place local residents regard as the heart of the Canton community.

The Pontcanna part adds to Riverside ward's unique diversity by being the home to a large number Welsh speakers as increasingly is neighbouring Canton. Children from Riverside ward overwhelmingly attend schools in the west of the city. At secondary level predominantly they attend the highly diverse Fitzalan High School (Canton Ward), the Welsh medium Ysgol Gyfun Plasmawr (Fairwater), and Church in Wales Bishop of Llandaff Church in Wales School (Llandaff).

In practice there are very few community links across the river, as the residential areas of Riverside and the Cardiff Central residential areas are separated, not only by the very significant geographical presence of the River Taff, but by the commercial city centre, the civic centre, and large swathes of park land.

This counter proposal also involves moving the Rumney and Llanrumney wards into two different constituencies. This again ignores the significant local ties between the wards. The school catchment areas for Llanrumney and Rumney are inter-linked at Eastern High school.

This proposal moves Llanrumney into a revised Cardiff North constituency. There are no particularly strong links between Llanrumney and Pontprennau & Old St Mellons. Indeed, the transport links are extremely limited between Llanrumney and Cardiff North. In practice there are no particularly strong community links at all between these two wards, and the proposal to move the wards of Llanrumney and Rumney into different constituencies is completely contrary to Rule 5 and respecting local ties.

This counter-proposal also involves a total of three electoral wards within Cardiff moving from their current constituencies; compared to the two wards affected by the Commission's Initial Proposals.

### **Liberal Democrat Counter Proposal**

The Liberal Democrats' counter proposal involves moving a significantly higher number of wards between existing constituencies in Cardiff. This counter-proposal, which returns Rumney and Llanrumney to Cardiff South and adds Gabalfa and the Heath to Cardiff Central again fails to take into account the strong local ties that exist.

The Gabalfa ward is very closely linked into the Llandaff North ward. Indeed, the Gabalfa Estate, one of the oldest housing estates in Wales, straddles these two wards. The Gabalfa roundabout brings together the communities of Whitchurch and Gabalfa. Residents in both Gabalfa and Llandaff North look towards the shopping district of Merthyr Road in Whitchurch.

The Heath ward borders the Llanishen ward. The two communities are closely tied, not just by transport links, but by school catchment areas, services and amenities. Given the close proximity of schools such as Ton Yr Ywen in Heath, many children living close by in



Llanishen attend. The two wards have good transport links, with a train line running through. Both wards share access to amenities such as Llanishen Lesiure Centre, Cardiff Lifestyle Park, Sports Clubs, Community Centres, green spaces and much more.

### **Summary**

Rule 5 in Schedule 2 of the Act specifies a number of factors that the Commission may take into account.

### **Boundaries of existing constituencies**

The initial proposals from the Commission move two wards from existing constituencies.

The counter proposals from the Conservatives move three.

The counter proposals from the Liberal Democrats move five wards within Cardiff into a different constituency.

Neither of these proposals are a better solution than the Commission's initial proposals. In fact, both are a worse solution.

### **Any 'local ties' that would be broken by changes in constituencies**

As is outlined above, the 'local ties' impacted by the Conservative counter-proposal are significant in regards to the impact of their proposals on Riverside, Llandaff North and Llanrumney.

The 'local ties' impacted by the Liberal Democrats' proposal are significant in relation to Gabalfa, Heath, Llanrumney, Radyr and Pentyrch.

Neither of these proposals are a better solution than the Commission's initial proposals. In fact, both are a worse solution with the Liberal Democrats' solution being significantly worse for the reasons set out above.

### **Conclusion**

I accept that there are some concerns about the links between Trowbridge and Splott in the initial set of proposals. However, as set out above, the various counterproposals all have greater failings in adhering to the statutory factors contained in Rule 5, Schedule 2.

I therefore submit that the Commission should reject the counter proposals.

The Commission's proposals for the four parliamentary constituencies in Cardiff meet both the electoral quota as defined by the Act but are also the least disruptive



proposals based both on the statutory factors and special geographical considerations within the Act.

Yours sincerely,



**Jo Stevens MP**  
**Cardiff Central MP**

Template

BCW-10205/ [REDACTED] / Cardiff

From: [REDACTED]

Sent: 29 March 2022 15:55

To: BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>

Subject: Boundary changes

Attached is my response to the proposed boundary changes

[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

29 March 2022

Dear Commission

I am writing as a **local resident**. This submission relates to the Commission's Initial Proposals for Cardiff North and I will briefly reference the three other adjoining seats in Cardiff – Cardiff Central, Cardiff West and Cardiff South and Penarth. This submission also addresses the counter-proposals put forward during the consultation period relating to Cardiff North.

I welcome the Initial Proposals for the constituency of Cardiff North which would see the constituency remain largely intact, with the addition of Taff's Well. I also welcome the Initial Proposals made for Cardiff West, Cardiff Central and Cardiff South and Penarth which, as a whole, would entail just two wards within Cardiff moving constituency. Appreciating that Cardiff Central is under-sized and Cardiff South and Penarth is over-sized, the proposal to add Rumney and Llanrumney wards to Cardiff Central is sensible and welcome.

The proposal to keep Cardiff North whole with the addition of Taff's Well acknowledges the geographical links with the natural boundary of the Taff River and given good transport links between Taff's Well and the north of Cardiff, Taff's Well would seem a natural addition to the constituency.

The counter-proposal put forward by the Conservative Party does not recognise or respect the existing and longstanding community links in Cardiff North. Llandaff North and Whitchurch feel very connected as communities. The two wards share amenities, schools, green spaces and public transport links. Llandaff North looks to Whitchurch as its main shopping district.

The natural boundary of the Taff River separates Llandaff North from Llandaff in Cardiff West which has few transport links and no sense of connection to each other. The two communities on opposite sides of the river have little in common other than in name and so the proposal to move Llandaff North to Cardiff West is neither sensible nor does it recognise the existing local ties. Moving Llandaff North to Cardiff West would also halve one of the oldest housing estates in Wales. Mynachdy is partly in Gabalfa. Gabalfa, Llandaff North and Whitchurch are all linked and accessed via the Gabalfa roundabout.

## Template

There is also no natural connection between Cardiff North and Trowbridge. This counter-proposal ignores the significant local ties between the wards of Llandaff North, Gabalfa and Whitchurch and the subsequent limited transport links between Trowbridge and north Cardiff. This proposal ignores the local ties that must be recognised under Rule 5 Schedule 2 of the Act.

The counter-proposal that would see Gabalfa and the Heath move to Cardiff Central also fails to take into consideration the strong local ties that exist in these wards. As neighbouring wards, the Heath is closely tied to Llanishen in transport, school catchment areas, leisure centres, the Cardiff Lifestyle Park, sports clubs, community centres, green spaces and much more, but Llanishen would stay within Cardiff North, creating an illogical and unnatural separation.

In conclusion, I support the Boundary Commission's Initial Proposals and reject the counter proposals as set out above. The Boundary Commission's proposals are respectful of local ties and are the least disruptive in nature, only proposing to move two wards in Cardiff instead of three or five as set out in the counter-proposals.

Thank you for giving this your consideration.

Yours sincerely,



**BCW-10206/ Cllr Graham Hinchey/ Cardiff**

**From:** [REDACTED]

**Sent:** 30 March 2022 09:49

**To:** BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>

**Subject:** GH Boundary Commission submission 290322 29th March 2022

Dear Commission

Please find attached my submission in support of the Boundary Commissions original proposal to keep Cardiff North intact, with the addition of Taffs Well to meet the statutory electoral range of constituents.

Every constituent that I have spoken to cannot believe that others are proposing putting Heath, one of the oldest and established linking communities, into Cardiff South which has a significant and dividing boundary of the A48(M)

As a Chair and vice chair of governors at both our local primary school, I can verify there are many long standing links with both Whitchurch and Llanishen High Schools in the north of Cardiff which support family friendships, , sporting and community groups in Heath & Birchgrove to the wider Cardiff North area.

Please do not uphold any of the alternative proposals of moving Heath into Cardiff Central, as this would have a devastating consequence to so many families and young people in the north of the city.

Cofion | Regards

[REDACTED]

**Y Cyng |Cllr Graham Hinchey**

**Welsh Labour Councillor for Heath & Birchgrove**

**Aelod Cabinet dros Blant a Theuluoedd|Cabinet Member for Children & Families**

**Cyngor Caerdydd | Cardiff Council**

Dear Commission

29<sup>th</sup> March 2022

I am writing as a local councillor, resident and local authority appointed governor at both Birchgrove and Ton yr Ywen Primary Schools. This submission relates to the Commission's Initial Proposals for Cardiff North and I will briefly reference the three other adjoining seats in Cardiff – Cardiff Central, Cardiff West and Cardiff South and Penarth. This submission also addresses the counter-proposals put forward during the consultation period relating to Cardiff North.

I welcome the Initial Proposals for the constituency of Cardiff North which would see the constituency remain largely intact, with the addition of Taff's Well. I also welcome the Initial Proposals made for Cardiff West, Cardiff Central and Cardiff South and Penarth which, as a whole, would entail just two wards within Cardiff moving constituency. Appreciating that Cardiff Central is under-sized and Cardiff South and Penarth is over-sized, the proposal to add Rumney and Llanrumney wards to Cardiff Central is sensible and welcome.

The proposal to keep Cardiff North whole with the addition of Taff's Well acknowledges the geographical links with the natural boundary of the Taff River and given good transport links between Taff's Well and the north of Cardiff, Taff's Well would seem a natural addition to the constituency. In direct contrast the counter-proposal put forward by the Conservative Party does not recognise or respect the existing and longstanding community links in Cardiff North. Llandaff North and Whitchurch feel very connected as communities. The two wards share amenities, schools, green spaces and public transport links. Llandaff North looks to Whitchurch as its main shopping district.

The natural boundary of the Taff River separates Llandaff North from Llandaff in Cardiff West which has few transport links and no sense of connection to each other. The two communities on opposite sides of the river have little in common other than in name and so the proposal to move Llandaff North to Cardiff West is neither sensible nor does it recognise the existing local ties. Moving Llandaff North to Cardiff West would also halve one of the oldest housing estates in Wales. Mynachdy is partly in Gabalfa. Gabalfa, Llandaff North and Whitchurch are all linked and accessed via the Gabalfa roundabout.

There is also no natural connection between Cardiff North and Trowbridge. This counter-proposal ignores the significant local ties between the wards of Llandaff North, Gabalfa and Whitchurch and the subsequent limited transport links between Trowbridge and north Cardiff. This proposal ignores the local ties that must be recognised under Rule 5 Schedule 2 of the Act.

The counter-proposal that would see Gabalfa and the Heath move to Cardiff Central also fails to take into consideration the strong local ties that exist in these wards. As neighbouring wards, the Heath is closely tied to Llanishen in transport, school catchment areas, leisure centres, the Cardiff Lifestyle Park, sports clubs, community centres, green spaces and much more, but Llanishen would stay within Cardiff North, creating an illogical and unnatural separation.

In conclusion, I support the Boundary Commission's Initial Proposals and reject the counter proposals as set out above. The Boundary Commission's proposals are respectful of local ties and are the least disruptive in nature, only proposing to move two wards in Cardiff instead of three or five as set out in the counter-proposals.

Thank you for giving this your consideration.

Your sincerely,  
Cllr Graham Hinchey (Heath Ward)

BCW-10207/ [REDACTED] / Unknown

**From:** [REDACTED]

**Sent:** 30 March 2022 07:19

**To:** BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>

**Subject:** Proposed Montgomeryshire and Glyndwr Parliamentary Constituency

Dear Sir/Madam

I am writing to you to give my full support for the proposed new Parliamentary Constituency of Montgomeryshire and Glyndwr. I think this is the fairest one for the areas concerned going forward with the proposed new constituencies. When the review is completed I hope this Parliamentary Constituency will be confirmed as Montgomeryshire and Glyndwr.

Thank you.

Regards

[REDACTED]

**BCW-10208/ Welsh Conservatives/ Cardiff**

**From:** [REDACTED]

**Sent:** 30 March 2022 10:00

**To:** BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>

**Cc:** [REDACTED]

**Subject:** 2023 Review of Parliamentary Constituencies

Dear Sirs,

Please find attached a letter from the Chairman of The Welsh Conservative Party together with the Party's response to the Boundary Commission for Wales' Second Consultation Stage of the 2023 Review of Parliamentary Constituencies in Wales.

**Welsh Conservative Party**

[REDACTED]



The Boundary Commission for Wales  
Hastings House  
Fitzalan Court  
Cardiff  
CF24 0BL

30<sup>th</sup> March 2022

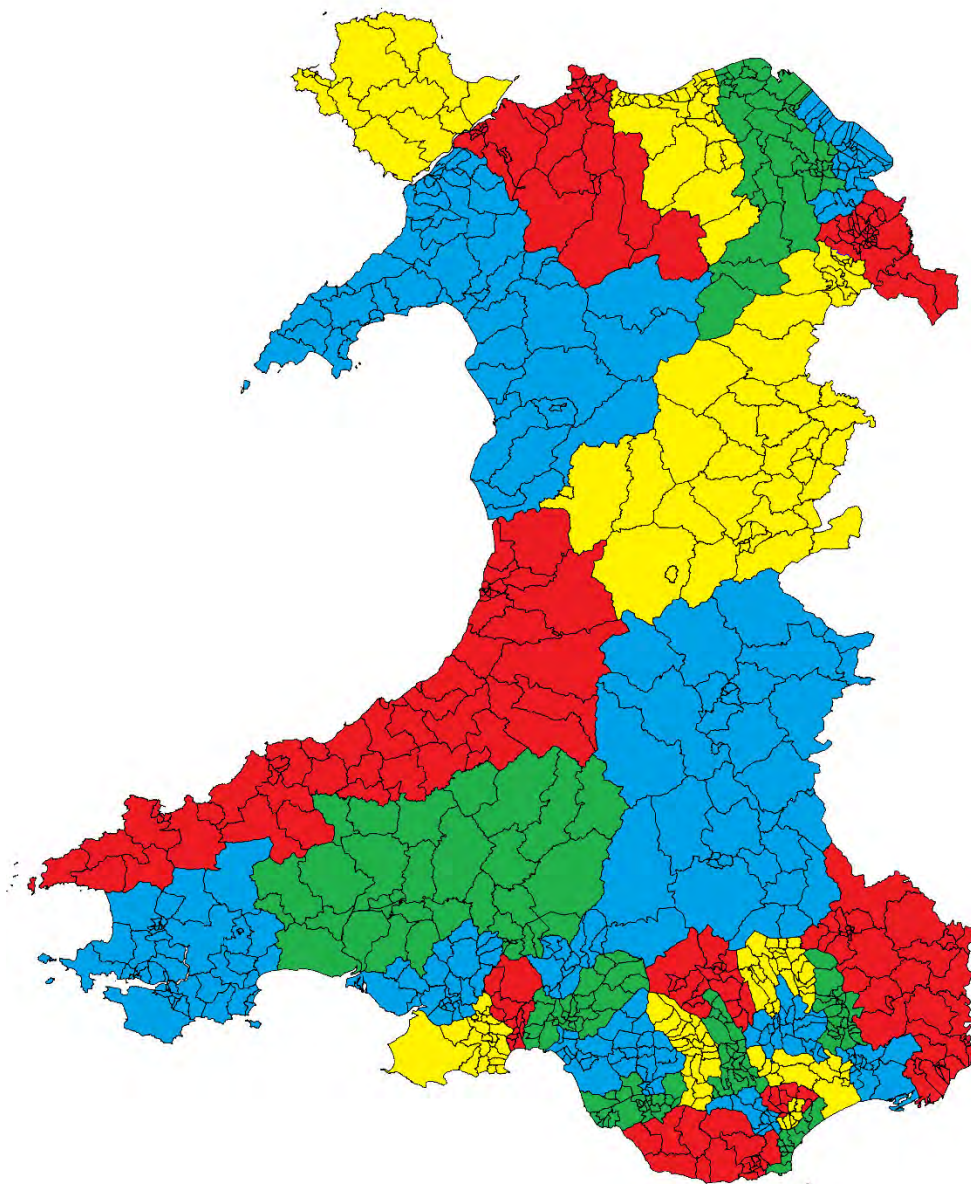
Dear Sirs,

I have much pleasure in enclosing **The Welsh Conservative Party's Response to the Boundary Commission for Wales' Second Consultation Stage of the 2023 Review of Parliamentary Constituencies in Wales.**

Yours faithfully,

[Redacted Signature]

[Redacted Name]  
Chairman  
Welsh Conservative Party



**Response from the Welsh Conservative Party to the  
Second Consultation Stage regarding the Initial  
Proposals for Parliamentary Constituencies in Wales**

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## **1. Introduction**

- 1.1 This response is complementary to the response of the Welsh Conservative Party to the initial proposals. (Representation number 9809). Together with the oral evidence given by [REDACTED] on behalf of the Party at the hearings in Cardiff on the 17<sup>th</sup> February and Aberystwyth on the 30<sup>th</sup> March.
- 1.2 We will not reiterate the points made in our original submission but instead concentrate on the representations submitted 8848 – 10075 and our perspective on them.
- 1.3 We note that many of the representations, probably in the region of 20%, deal with matters that are outside the scope of the Boundary Commission for Wales. For example, complaining about the number of constituencies allocated to Wales. We will not comment on any of these unless there is a particular point to make.
- 1.4 We further note that a number of the representations misunderstood the nature of the proposals believing, for example, that this changes the boundaries of their local council.
- 1.5 We note that there are a number of counter proposals either for the whole of Wales or covering the north of Wales or limiting the counter proposal to a small number of constituencies. We will comment on these at the appropriate point in our response but when we have looked at all the constituencies we will provide a general overview of some of the key counter proposals.
- 1.6 We will measure all the proposals against the criteria of The Rules for Redistribution of Seats of the Parliamentary Constituencies Act 1986 (as amended). We will refer throughout this document to Rule 5 of Schedule 2 of the Act.
- 1.7 There are a small number of cases where we believe it may be possible to improve from our original position as a result of studying the representations in these cases. We will indicate it at the appropriate section.
- 1.8 Although in our original document we followed the Commission in looking at each constituency in alphabetical order we believe it is best in this document to look at the proposals on a geographical basis.
- 1.9 As we did in our oral evidence at the hearings, we will divide Wales between 5 groupings or sub regions, each containing a number of local authorities.
- 1.10 Our sub regions will be as follows:

Area	Local Authority	Seats
Gwent	Blaenau Gwent, Newport, Caerphilly, Monmouthshire, Torfaen	6
Mid and South Glamorgan	Merthyr Tydfil, Rhondda Cynon Taf, Cardiff, Vale of Glamorgan	8
West Glamorgan and part Powys	Swansea, Neath Port Talbot, Bridgend, Brecon & Radnor	6
Dyfed	Ceredigion, Pembrokeshire, Carmarthenshire	4
North Wales & part Powys	Gwynedd, Conwy, Denbighshire, Wrexham, Flintshire, Montgomeryshire	7

- 1.11 We do not believe we need to comment further on the protected constituency of Ynys Mon.
- 1.12 We note that these sub regions mirror the Boundary Commission's proposals except in the case of one ward from Gwent (Nelson, which is included in Mid and South Glamorgan). We note that in our proposal, and a number of others, that this anomaly is rectified.
- 1.13 Some counter proposals cross these boundaries which is likely to mean a poorer compliance with Rules 5 (1) b.
- 1.14 We do believe these sub regions provide for best possible adherence to the Rules and that is why we support them.
- 1.15 We will now examine each of the five sub regions and give our response to the representations received.

## **2. GWENT**

- 2.1 This covers the local authorities of Blaenau Gwent, Newport, Caerphilly, Monmouthshire and Tofaen.
- 2.2 These five local authorities are exactly entitled to six seats and therefore the allocation is very accurate.
- 2.3 We note within this group two authorities, Monmouthshire and Torfaen, are within quota. The other three authorities, Blaenau Gwent, Caerphilly and Newport, are exactly entitled to four seats.
- 2.4 We note that the proposal for Monmouthshire being co-terminus with the local authority borders has wide support.

We note that this is supported by Monmouthshire County Council with a submission signed by all four group leaders (9893).

- 2.5 We also note it is supported by the MP, David Davies (9392), the Senedd Member, Peter Fox (9502) and by a number of individuals and others, for example, 8868, 8895, 9388, 9396, 9408, 9503, 9670, 9680, 9689, 9699 and 9993.
- 2.6 We note that there is some opposition, although less than the support, from some areas currently in Newport East. We note that much of this seems to stem from a wish not to lose their existing MP, which is not a factor that can be taken into account.
- 2.7 We note there is widespread support and very little opposition to Torfaen being co-terminus with the Council.

We note this includes the local MP, Nick Thomas-Symonds (9795) together with a number of representations, for example, 8906, 9026, 9295, 9370, 9446 and 9613 from Pontypool, whose representation we would particularly draw to the Commission's attention.

- 2.8 We also note the support of the Labour Party (10049), the Liberal Democrats (9992) as well as a number of counter proposals, including 9622, 9822, 9952, 10055 and 10070 for Monmouthshire and Torfaen to be co-terminus.
- 2.9 We note limited opposition to this, notably Plaid Cymru (10021) and counter proposal (9768)

We note that Plaid Cymru splits Monmouthshire in three, an even worse position than currently, which is improved under the proposals.

- 2.10 We do not see any justification whatsoever for any alternative proposals for Monmouthshire or Torfaen. It is very compliant with Rule 5 (1) b and we fully support the Boundary Commission proposals.
- 2.11 Therefore, there needs to be four constituencies created from the local authorities of Blaenau Gwent, Caerphilly and Newport.
- 2.12 We note the Commission have proposed this, less the one Caerphilly ward of Nelson, which is proposed to be included in Merthyr Tydfil and Aberdare.

- 2.13 We note there is general support for the proposed constituencies of Newport East and Blaenau Gwent & Rhymney.
- 2.14 We note that the proposed Newport East constituency is totally within the Newport local authority, this being compliant with Rule 5 (1) b.
- 2.15 We note the support of the Labour MP for Newport East, Jessica Morden (9922) and there is other support for Newport East/Newport, for example 9663,9734, 9737, 9835 and 10036.
- 2.16 We note that both the Labour Party (10049) and the Liberal Democrats (9992) support this proposal.
- 2.17 We note the support of a number of counter proposals for this proposal including 9622, 9952, 10055 and 10070.
- 2.18 We note that although 10070 supports Newport East, it splits the Newport local authority between three seats making it worse under Rule 5 (1) b. 9875 also splits Newport in three.
- 2.19 The Green Party (9924) is even worse, splitting Newport between four seats.
- 2.20 Some proposals including Plaid Cymru (10021) splits Newport East between two local authorities.
- 2.21 These proposals split Newport East between Monmouthshire and Newport, this being worse under Rule 5(1) b in both cases.
- 2.22 We therefore strongly support the Newport East constituency as proposed, being very compliant with Rule 5 (1) b.
- 2.23 We note very little opposition to the proposed Blaenau Gwent and Rhymney seat which is a logical extension of the current Blaenau Gwent seat.
- 2.24 We note the support of the MP for Blaenau Gwent, Nick Smith (9877) together with support from representation 9926.
- 2.25 We note the support of the Labour Party (10049) and the Liberal Democrats (9992) for this proposed constituency.
- 2.26 We note that Plaid Cymru (10021) splits the small local authority of Blaenau Gwent between two constituencies. This worsens the current position and is a breach of both Rule 5(1) b and c.
- 2.27 We therefore strongly support the proposed Blaenau Gwent and Rhymney constituency.
- 2.28 We note there is much more contention about the two proposed seats of Newport West and Caerphilly & Islwyn.
- 2.29 We note that the Labour Party (10049) support both these seats as proposed.
- 2.30 We also note that the Labour MP for Islwyn, Chris Evans (9500) and the Labour MS for Islwyn, Rhianon Passmore (9501) support Islwyn as proposed and make very strong arguments for the linking of communities in the proposed constituency. We note support for Islwyn in representation 9358.
- 2.31 We also note there are representations supporting the Caerphilly Newport West linking, for example, 9373, 9819 and 9831. As well as counter proposal 9952 which also supports Nelson being included in Islwyn rather than Merthyr Tydfil and Aberdare.
- 2.32 We further note that at the Cardiff public hearing the Labour MP for Islwyn (Chris Evans) made a very strong case for the proposed Islwyn seat.



We also note the support of Caerphilly residents [REDACTED] and [REDACTED], [REDACTED] and [REDACTED] for the proposed Newport West and Caerphilly seat.

- 2.33 We appreciate, however, that there is some concern about the linking of Caerphilly and Newport West and a counter proposal that just affects the proposed Newport West & Caerphilly and Islwyn constituencies. We will refer to this as representation 9929 from Wayne David, the MP for Caerphilly.
- 2.34 Although there are a number of representations supporting Mr David, the wording of a large number of them is very similar.
- 2.35 He complains that his constituency is divided between four constituencies. His proposal would divide it between three but Islwyn, which is proposed to be divided by two, would, under his proposal, be divided between three.
- 2.36 In our view the worst aspect of the splitting of Caerphilly in four is the removal of the Nelson ward with its inclusion with Merthyr Tydfil & Aberdare.
- 2.37 Nelson becomes an orphan ward. Merthyr Tydfil & Aberdare consists of three local authorities and Caerphilly Borough is split between four constituencies rather than three.
- 2.38 We note representation 8913, 8983, 8985, 9801, 10059 and 10065 oppose Nelson being included with Merthyr Tydfil & Aberdare. Whilst we acknowledge some of those include certain items the Commission cannot take account of, they also show the close local ties they have with the Caerphilly local authority and particularly Ystrad Mynach ward. Representation 9143 shows the link between Ystrad Mynach and Nelson.
- 2.39 We note in particular that in representation 10059 the resident of Nelson ward mentions the alternative plan of Wayne David. However, Wayne David does not address the Nelson issue, the worst splitting of Caerphilly in our opinion.
- 2.40 We would therefore combine Nelson with Ystrad Mynach and the Caerphilly wards in Islwyn which can accommodate it without any other adjustment. In doing so, like Wayne David, we just split the existing Caerphilly constituency in three rather than four. Islwyn is split in just two not three. Caerphilly Council only consists of three constituencies rather than four and Merthyr Tydfil & Rhymney consists of two local councils not three.
- 2.41 Our local government links are much better and we restore local ties between Nelson and Ystrad Mynach. This improving the position under Rule 5 (1) b and d.
- 2.42 We note that the MP for Newport West, Ruth Jones (10043) and the MS for Newport West, Jayne Bryant (9921) both propose the existing Newport West constituency plus two Risca wards but without dealing with the knock-on consequences.
- 2.43 We believe the Commission proposal for Newport West & Caerphilly and Islwyn is superior to the counter proposal.
- 2.44 We believe the links between Caerphilly through the Bedwas, Trethomas and Machen ward along the A468 into Newport are very strong and much more superior to the links of the Argoed and Penmaen wards, for example, are to Newport. We note that Argoed and Penmaen have very strong links to Blackwood which would be broken under the counter proposals in breach of Rule 5 (1) d.

- 2.45 We would have no objection to the constituency being called Caerphilly & Newport West as suggested in representation 9594 as Caerphilly has the slightly larger proportion of the electorate.
- 2.46 We therefore believe the Commission proposals for Gwent are logical and best meet the Rules and can be improved further by the addition of the Nelson ward into the Islwyn constituency.
- 2.47 We note our proposals for Gwent are exactly mirrored by counter proposal 9766 and we commend them to the Commission.

### **3. MID GLAMORGAN AND SOUTH GLAMORGAN**

- 3.1 This covers the local authorities of Merthyr Tydfil, Rhondda Cynon Taff, Cardiff and the Vale of Glamorgan.
- 3.2 The entitlement of these four local authorities is to eight constituencies. We note the Commission propose eight constituencies including the Caerphilly Borough ward of Nelson. We have explained why we would include this ward in our proposed Gwent alternative.
- 3.3 We support the concept of the linking of Merthyr Tydfil local authority with Aberdare. We note that in respect of Merthyr Tydfil representation 9603 supports this as does 9843 which states that “Merthyr and Aberdare are more closely linked than Merthyr and Rhymney”.
- 3.4 We note that Merthyr Tydfil has the smallest electorate of any local authority in Wales. It is currently intact but Plaid Cymru (10021) would split it between two constituencies and the Wales Green Party between three constituencies. This is a clear breach of Rule 5 (1) b and c.
- 3.5 We note that there are many objections about Cynon Valley being split. In particular, the splitting of Aberdare from Aberaman. We note in particular the comments of Rhondda Cynon Taf Council (9866), representations 9190, 9685 and 9647. Also, Cynon Valley Labour Party (9793) and the councillor for Aberaman North (9790) which shows the very close ties between Aberdare and Aberaman.
- 3.6 We therefore believe there is an overwhelming case for Aberaman North and Aberaman South being included in the Merthyr Tydfil & Aberdare constituency. With Nelson moving out this would mean that it consisted of two local authorities rather than three, being more compliant with Rule 5 (1) b. As local ties are restored between Aberdare and Aberaman, it is also more compliant with Rules 5 (1) d.
- 3.7 We note there are representations from Mountain Ash but it is not possible to include Mountain Ash as well, so it needs to be included in Pontypridd. We would also include the Cwmbach ward which has ties to Mountain Ash.
- 3.8 We would not object to Mountain Ash being included in the name of the constituency as suggested in representation 9339.
- 3.9 We note there are a number of objections to Pontyclun and Taffs Well being included in Cardiff West and Cardiff North respectively.
- 3.10 Although we believe it is necessary for Pontyclun to be included in a Cardiff based constituency because of numbers, we also believe there are good links between Pontyclun and Creigiau and St Fagans in Cardiff West.
- 3.11 We also note there is some support for this proposal, e.g. 9088, 9165, 9774 and the Labour Party (10049).
- 3.12 We also note that many of the representations from Pontyclun are under the mistaken impression that they are being included in Cardiff Council and that services will change. An example of someone misled is representation 9090.
- 3.13 However, we do not believe it is necessary for two wards from Rhondda Cynon Taf to be included in Cardiff based constituencies.
- 3.14 We would therefore include Taffs Well, which includes Nantgarw, in Pontypridd.

- 3.15 We note there are a number of objections to Taffs Well's inclusion in Cardiff North including Rhondda Cynon Taf Council (9866), Pontypridd Labour Party (9743), Cllr Jonathan Bishop (9000) and 9661.
- 3.16 We note that by including Taffs Well in Pontypridd, Rhondda Cynon Taf is divided between four constituencies rather than five under the initial proposals. Thus, this is an improvement under Rule 5 (1) b.
- 3.17 We note there is very little objection to the proposed Rhondda constituency. Further, in respect of the area coming into the constituency from the existing Ogmore constituency, we note the support from Cllr Williams, a Llanharan Ward Community Councillor (9240). We therefore support the Rhondda constituency as proposed by the Commission.
- 3.18 We note that there are few representations from Cardiff about the proposals. Most of the representations are from wards in different local authorities included within Cardiff constituencies.
- 3.19 We note that there is a representation from the electoral services in Cardiff (9623). They point out the inconvenience of including wards from other authorities. Hopefully, under our proposals, we improve this slightly by including one less ward, Taffs Well, in a Cardiff based constituency (Cardiff North) comprising just one local authority rather than two. This being more compliant with Rule 5 (1) b.
- 3.20 We note that there are a number of comments on the proposed Cardiff South and Penarth Constituency in respect of the lack of any link between the Splott and Trowbridge wards.
- 3.21 Representation 10070 says the constituency is discontinuous. Representation 8896 challenges the Commission to walk from Trowbridge to the rest of the constituency without getting wet. This representation shows the links between Rumney and Trowbridge and helpfully provides a map. 9038 also suggests where Rumney should be included.
- 3.22 We note that adding Rumney to Cardiff South and Penarth and excluding Dinas Powys means that the constituency is made up entirely of wards from the current constituency. It is therefore very compliant with Rule 5 (1) c. As there are no detached parts, it is also more compliant with Rule 5 (1) a.
- 3.23 We note the Liberal Democrats (9992) have exactly the same proposals as we do for Cardiff South and Penarth.
- 3.24 We would include Llanrumney within Cardiff North and note that the Liberal Democrats also do this (9992). Our Cardiff North seat also meets the criteria for St Mellons Community Council (9490).
- 3.25 As well as excluding Taffs Well, we would also exclude Llandaff North which we would combine with Llandaff in Cardiff West.
- 3.26 We note a lot of counter proposals do combine the two wards in the same constituency including Plaid Cymru (10021), the Wales Green Party (9924) and 9622, 9766, 9822, 10055 and 10070.
- 3.27 As a result of uniting Llandaff in Cardiff West we can include Riverside ward with all the existing wards of Cardiff Central. We note that the Wales Green Party (9924) include Riverside with a number of Cardiff Central wards.
- 3.28 As a result of these changes, we can retain the Dinas Powys Ward in its existing constituency of Vale of Glamorgan.
- 3.29 We note this is the only constituency in Wales where the electorate allows it to be no change. We believe this to be the best possible solution and very compliant with Rule 5 (1) c.

- 3.30 We note a lot of objections to Dinas Powys being included in Cardiff South and Penarth and although some of these make points about linking with Cardiff, most of them show the ties that are broken by being separated from Barry.
- 3.31 We note that the Member of Parliament, Alun Cairns (9930) supports the retention of Dinas Powys in Vale of Glamorgan along with a number of representations including for example, 9657, 9798, 9808, 9888, 9905, 9909, 9920, 9960 and 10020.
- 3.32 We also note that the Liberal Democrats (9992) and counter proposal 9875 have exactly the same proposal as us in respect of Dinas Powys being included in Vale of Glamorgan.
- 3.33 By retaining Dinas Powys in the Vale of Glamorgan we restore local ties, this being more compliant with Rule 5 (1) d.
- 3.34 We note the support of Cllr Adrian Robson (9815) in respect of our proposals for Cardiff and the Vale of Glamorgan.
- 3.35 We note the representations from Andrew RT Davies MS, Regional Member of South Wales Central (9903). We note he argues community links that support our counter proposals for this region.
- 3.36 We also note the support at the Cardiff public hearing for Dinas Powys to be included in the Vale of Glamorgan. We particularly note the evidence of [REDACTED], a life-long resident and councillor of the Dinas Powys ward.
- 3.37 We note that there are a number of counter proposals but not backed up with any local representation which would split the Vale of Glamorgan, in some cases linking Barry with Penarth and Cardiff and then some linking Porthcawl with the Vale of Glamorgan. We reject all of these alterations as they split an existing constituency, so they are worse under Rule 5 (1) c and in some case than Rule 5 (1) b. They also break local ties with the Vale of Glamorgan, this being worse under Rule 5 (1) d.
- 3.38 We therefore propose modest changes in Mid and South Glamorgan which particularly reflect concerns in Aberaman and Dinas Powys. Our proposals improve the position under Rule 5 (1) b, c and d.

#### **4. WEST GLAMORGAN AND PART POWYS**

- 4.1 This includes the local authorities of Bridgend, Neath Port Talbot and Swansea and the Brecon and Radnor part of Powys.
- 4.2 This area is entitled to and allocated six constituencies which we fully support.
- 4.3 We believe in respect of the two proposed constituencies of Aberafon Porthcawl and Bridgend that the wards making up these two constituencies are the right ones but the proposed boundary between the two is flawed and not compliant with Rules 5 (1) c.
- 4.4 We note that there are more objections to these two proposed constituencies than anywhere else in South Wales. We note the objections come from Port Talbot, Porthcawl with the largest number from Bridgend itself.
- 4.5 We note just some of the objections in representations 8939, 8942, 8961, 8973, 8986, 8993, 9006, 9016, 9017, 9050, 9057, 9173, 9180, 9225, 9308, 9547, 9630, 9666.
- 4.6 We also note the comprehensive objections from the MP for Bridgend, Jamie Wallis (9878).
- 4.7 We note the many representations also point out that the town of Bridgend is split between two constituencies. We particularly note the many representations from the Cefn Glas, Llangewydd and Brynhyfryd, and Bryntirion, Laleston and Merthyr Mawr wards. These representations clearly show the local ties that are broken, separating these wards from the Pen-y-Fai, Newcastle and Oldcastle wards in Bridgend.
- 4.8 We believe this is one of the most serious breaches of breaking local ties in the whole of Wales and our proposal would rectify it, building on the existing constituency of Bridgend. Thus we would be much more compliant with Rule 5 (1) c and d.
- 4.9 We note that the Liberal Democrats (9992) also restore the existing constituency of Bridgend albeit that they add different wards to it.
- 4.10 We also note a number of counter proposals put Bridgend back together again including 9622 and 10070.
- 4.11 We also note that like us a number of proposals link Port Talbot with Maesteg, for example, the Liberal Democrats (9992), 9622 and 10070.
- 4.12 We therefore support an alternative way of configuring the two constituencies which much better respects local ties and the existing Bridgend constituency.
- 4.13 We strongly support the composition of the proposed Brecon and Radnor constituency.
- 4.14 We note although there is some opposition to this constituency, it is less than the number of other objections, for example, to the Bridgend constituency.
- 4.15 However, we do acknowledge this opposition, although some of it is based on misconception and misunderstanding. For example, 9119 and 9120, which are very articulate and well argued, assume that they will have to go to Brecon to see their MP.
- 4.16 Many objections are based on the size of the constituency. We acknowledge that it is the largest constituency proposed but the current Brecon and Radnor constituency has to expand and any other alteration would increase the size more than this proposal.
- 4.17 One of the clear misunderstandings is the nature of the current Brecon and Radnor constituency.

- 4.18 The largest town in the current constituency is not Brecon but Ystradgynlais, which is a part of the Swansea Valley and links very well to Ystalyfera and Pontardawe. All communities are part of the Swansea Valley and are on the River Tawe.
- 4.19 We note that a number of the representations, although in some cases objections, acknowledge the ties between Ystradgynlais and Ystalyfera, for example, representations 8852, 10041 and 10044.
- 4.20 We note the Labour party (10049) supports the constituency saying it is “a natural extension of the existing constituency representing ties between Ystradgynlais and Ystalyfera.”
- 4.21 We also note the support of the MP for Brecon and Radnor, Fay Jones (9932) and the support from representations 8876, 8905 and 9980, the latter one we would particularly draw to the attention of the commission.
- We also note the evidence of Tom Giffard, a Regional Senedd Member for South Wales West, at the Swansea public hearing.
- 4.22 Nearly 25% of the electorate come from the Neath Port Talbot local authority and, with the Ystradgynlais area, about a third of the electorate of the proposed constituency would be in the Swansea Valley.
- 4.23 Whoever was the Member of Parliament for this constituency could not ignore these electors. They would certainly have surgeries in the Swansea Valley area. (The MP for Brecon and Radnor currently holds surgeries in Ystradgynlais). They may even decide to have an office or sub-office in the Swansea Valley. There is no reason why constituents would need to go to Brecon, the MP would come to them.
- 4.24 We note that representation 10070 comes from Neath and provides a Wales-wide counter proposal. We applaud the statement in this representation which says; “I agree that the best place for the Brecon and Radnorshire constituency to cross the Powys county boundary is into Neath Port Talbot in the Upper Swansea valley. This reflects the population distribution of the constituency well, with Brecon and Ystradgynlais being by far the largest towns, sitting along the T6 Traws-Cymru bus route towards Neath and Swansea. Ystradgynlais forms part of a contiguous urban area across the county boundary with Ystalyfera in Neath Port Talbot – this boundary crossing is absolutely seamless. Well done to the Commission on finding this idea”.
- 4.25 We note the representations 8923, 9715 and 9980, whilst supporting the constituency, suggest that the Swansea Valley area should be reflected in the name. One of the representations saying it would be more inclusive. We agree and believe a lot of the misunderstandings would be addressed if a name such as, Brecon, Radnor and the Upper Swansea Valley or Brecon, Radnor and Cwm Tawe, or any alternative that represented both the area coming into the constituency and Ystradgynlais.
- 4.26 We note that Neath Port Talbot Council (9890) object but without any alternative counter proposals. Also, Neath Labour Party (9870) produce a counter proposal where both of their alternatives are outside the scope, Neath being well over quota and Brecon and Radnor well under quota.
- 4.27 We do agree with both these representations in that Neath being the largest part of the proposed Swansea East and Neath constituency should be first in the name of the constituency. We also note that is the view of the Neath Town Council (9492) and in counter proposal 10070.



- 4.28 We note there is a lot of objections to link Neath with Swansea. We hope that may be a little assuaged by having Neath first in the name of the constituency.
- 4.29 We note Coedffranc Community Council (9574) supports being included in the Neath constituency.
- 4.30 We support the proposed Swansea East and Neath, and Swansea Central and North constituencies albeit that we would alter the name of the first one and designate the second one a county constituency.
- 4.31 We did look to see if there could be an alternative configuration for the two seats. We noted representation 9792 where it states that the Commission have drawn “a logical Gower and Swansea West seat which largely corresponds to what local opinion considers Gower to be”.
- 4.32 We note that the representation notes a strong case but has to split wards to achieve his counter proposal for these two seats. If there was a better way of configuring these two seats we would be open to it but we believe it is particularly the size of the wards that makes it very difficult.
- 4.33 We strongly support the proposed Swansea West and Gower constituency although we believe as Gower has the larger electorate, Gower should come first in the name.
- 4.34 We note that the Gower Society (9429) also believes the Gower element should come first in the name, although it appears to have no objection to the composition of the constituency.
- 4.35 We note that there is support for the proposed Swansea West and Gower constituency in representation 9827 and counter proposal 9822.
- 4.36 We also note the support from Cllr Lyndon Jones (10071) and the councillor for Fairwood ward (9804) which show the strong arguments for the linking proposed. We also note the evidence given by Cllr Lyndon Jones, [REDACTED] and [REDACTED] at the Swansea public hearing.
- 4.37 There are some alternative counter proposals for the three seats, but we do not believe these appear to have much local support and we believe they are inferior to the proposals.
- 4.38 In particular, we note the counter proposal from Geraint Davies MP (9908) and the Labour Party (10049) which takes Sketty and Mayals out of the proposed constituency.
- 4.39 One of the positive aspects of the proposal was to reunite the Mumbles community Council by including Mayals with West Cross, Newton and Oystermouth. This counter proposal would mean Mumbles being divided. We understand one of the aims the Commission had, which it achieved with this proposal and one in South East Wales, was to ensure no community council was divided. We fully support this aim and therefore support the proposal and reject the counter proposal.
- 4.40 We note in counter proposal 10070 that it states, “I commend the Commission for reuniting Mumbles community within a single constituency. The desire of people in the Mayals ward to be in the Gower constituency with the remainder of Mumbles community in the Gower constituency has come up repeatedly at previous reviews.”
- 4.41 We therefore support the composition of the constituencies in Swansea, Neath and Brecon and Radnor subject to some name and designation changes.

## **5 DYFED**

- 5.1 This covers the local authorities of Carmarthenshire, Ceredigion and Pembrokeshire.
- 5.2 These three local authorities are exactly entitled to four constituencies. We note this is what the Commission allocates them and we fully support this.
- 5.3 We note that Carmarthenshire is exactly entitled to two constituencies and a combination of Ceredigion and Pembrokeshire is entitled to two constituencies. We note this represents the allocation proposed by the Commission and we fully support it.
- 5.4 We note that all four political parties with representation in Westminster or the Senedd; Conservative Party (9809), Liberal Democrats (9992), Plaid Cymru (10021) and the Labour Party (10049), support the proposal that Carmarthenshire should be allocated two constituencies and Ceredigion and Pembrokeshire two constituencies, albeit that within these groupings some of them propose minor change.
- 5.5 This allocation is very compliant with Rule 5 (1) b and we believe any alteration would be inferior to this combination.
- 5.6 Whilst there is general agreement that Carmarthenshire should contain two whole seats, there is some disquiet about the way the two proposed constituencies have been configured.
- 5.7 We note both the Labour Party (10049) and the Liberal Democrats (9992) support the allocation in full of the proposed two constituencies. We also note the support in representations 9224 and 9359.
- 5.8 The main concern is that areas with very close ties to Carmarthen are included in the Llanelli constituency rather than the Caerfyrddin constituency. This is outlined in a number of representations including 8848, 8978, 9046, 9112, 9355, 9361, 9362, 9368, 9369, 9532, 9570, 9718, 9950, 9968.
- 5.9 We believe there is an overwhelming case that Llangunnor ward be included in Caerfyrddin. We have proposed this, as has counter proposal 9766 and Cllr Rob Jones, the Labour Leader of Carmarthenshire Council (9958). We also note that Plaid Cymru (10021) who also move this ward although they would move other wards as well. Moving Llangunnor ward can be achieved without any other changes as both constituencies are still within quota.
- 5.10 We note this is also supported in particular by Llangunnor Community Council (10015).
- 5.11 You have then to decide whether wards are swapped between the two other constituencies as suggested by, for example, Llanelli Town Council (9435) and Llandyfaelog Community Council (9439).
- 5.12 We note these counter proposals, but we can't reconcile their electorate figures. However, their alterations are all within quota.
- 5.13 We assume in addition to Llangunnor they wish to include in Caerfyrddin the St Ishmaels and Llangyndeyrn wards.
- 5.14 We note that many of the concerns referred to in 5.8 come from these wards and we also note that the Llangyndeyrn Community Council (10006) also wishes to be placed in Carmarthen.
- 5.15 We note that Llanelli Town Council (9435) and Llandyfaelog Community Council (9439) have suggested different wards that should consequently be transferred from Caerfyrddin to Llanelli.

9435 suggests Saron and Penygroes while 9439 suggests Ammanford, Pontamman and Betws. Either of them work.

- 5.16 We do think there is merit and local support for these alternatives. We would not be averse to this alternative in addition to Llangunnor. We would therefore also include St Ishmaels and Llangyndeyrn in Caerfyrddin and either one of the two alternatives suggested above moved to Llanelli. As Llanelli Town Council have suggested one, we would have a preference for this but the more important issue is to satisfy local concerns just south of Carmarthen.
- 5.17 We note that Plaid Cymru (10021) have a different solution; they would take Gorslas rather than St Ishmaels and Llangyndeyrn in. We believe this doesn't accurately reflect local concerns.
- 5.18 However, the main reason we would oppose Plaid Cymru is what they propose taking out of the proposed Caerfyrddin constituency.
- 5.19 They propose moving Laugharne Township, St Clears and Llansteffan into Llanelli. We totally oppose this. There is no local support for this and we believe there would be widespread opposition. These three wards have close ties to Carmarthen which would be broken by this proposal in breach of Rule 5 (1) d.
- 5.20 We note there are a number of counter proposals and a very small number of representations which suggest breaking the Carmarthenshire boundary when it is entitled to two constituencies. We can see no justification for any of these proposals which are an infringement of Rule 5 (1) b.
- 5.21 We note one of these proposals comes from Ceredigion County Council (9864). Their constituency including Ceredigion would include wards from both Carmarthenshire and Pembrokeshire. Thus it would comprise three local authorities being worse under Rule 5 (1) b. It would then take a long northern strip of Carmarthenshire which would break important local ties in Carmarthen, this being worse under Rule 5 (1) d.
- 5.22 It also takes Fishguard out of the proposed constituency. We note representation 9548 which supports the proposal for Fishguard to be linked with Ceredigion.
- 5.23 We also note that the proposed Caerfyrddin constituency would also incorporate wards from Pembrokeshire so it would consist of two local authorities rather than one under the proposals. Carmarthenshire would be split between three constituencies rather than two under the proposals.
- 5.24 This proposal is much worse under the Rules and in particular Rule 5 (1) b and we reject it.
- 5.25 We note there are more representations in support of the Ceredigion Preseli proposed constituency than any other proposal in Wales. We note these representations include 9242, 9411, 9910, 9912, 9913, 9994, 9995, 10019 as well as many others.
- 5.26 We also note the support for the Mid and South Pembrokeshire proposed constituency including in representations 9097, 9233 and 9403.
- 5.27 We further note support for both the two constituencies from the Liberal Democrats (9992) and counter proposals 9822 and 10070.
- 5.28 We note there is some opposition to the proposed constituency of Ceredigion Preseli mainly from the Ceredigion part. Many of the arguments are about the size of the proposed constituency and many want to retain Ceredigion on its own. Some suggest Ceredigion should be one constituency and Pembrokeshire one constituency. This is clearly outside the scope of the legislation.
- 5.29 There are very few objections to specific parts of north Pembrokeshire being included with Ceredigion.

- 5.30 We note that both Labour (10049) and Plaid Cymru (10021) would include Maenclochog ward with Ceredigion. They have slightly different plans as to which wards should be included in Mid and South Pembrokeshire.
- 5.31 We oppose Maenclochog ward being included in Ceredigion. We note that in a previous review it was suggested that Maenclochog be included with Ceredigion and this was widely opposed by residents in the ward.
- 5.32 We note in counter proposal representation 10070 it says, "I particularly agree with the Commission in keeping the Maenclochog ward in Mid and South Pembrokeshire given its strong local ties with the town of Narberth".
- 5.33 We therefore support the allocation of four constituencies to Dyfed, support the composition of the Ceredigion Preseli and Mid and South Pembrokeshire constituencies. We would support some minor changes between Caerfyrddin and Llanelli to ensure more wards with a strong link to Carmarthen are included in the Caerfyrddin constituency.

## **6 NORTH WALES**

- 6.1 This covers the local authorities of Gwynedd, Conwy, Denbighshire, Flintshire, Wrexham and the Montgomeryshire part of Powys. This area is entitled to seven constituencies and this is the allocation of the Commission which we support.
- 6.2 We note that it would not be possible to allocate an exact number of constituencies to the five north Wales local authorities and therefore the addition of Montgomeryshire enables a sensible allocation of seven constituencies.
- 6.3 We strongly support the proposal to keep the whole of Montgomeryshire intact which is co-terminus with the constituency, this being compliant with Rule 5 (1) c. We note there are a number of counter proposals which break up Montgomeryshire; we oppose these.
- 6.4 We note that in a previous review the Commission did propose splitting Montgomeryshire. However, this was when the number of seats and the electorate were different and there was not a logical way of keeping Montgomeryshire whole, which there is on this occasion.
- 6.5 We note that on the previous occasion there were widespread objections to splitting Montgomeryshire and we expect this to be the position this time.
- 6.6 We note there are a number of representations supporting keeping Montgomeryshire intact. These include representations 8865, 9419, 9430, 9434, 9438, 9829 and 9914, which support the constituency but suggests a name change. We also note the support of the Member of Parliament, Craig Williams (9814).
- 6.7 We also note the support for Montgomeryshire remaining intact at the Wrexham hearing from former MPs [REDACTED] and [REDACTED] and [REDACTED].
- 6.8 We note that many of the objections come from the Wrexham and Denbighshire areas proposed to be added to Montgomeryshire. We note that many of them complain about the size of the proposed constituency.
- 6.9 We note there are a number of counter proposals which propose Montgomeryshire and Meirionnydd. This is both for counter proposals which keep Montgomeryshire intact and those that split it. This proposed constituency would be much larger than the proposal of the Commission and therefore complaints about the size would be even more accurate. We note many of these proposals have a constituency stretching from the Welsh coastline to the English border. We do not believe this is acceptable.
- 6.10 We believe Corwen and Llandrillo are better linked with the Denbighshire wards. We note representation 9557 from Corwen on behalf of Cynwyd Community Council which doesn't want to link to Montgomeryshire.
- 6.11 We note representation 9202 and 9328 which show the strong ties between Penycae proposed in the Montgomeryshire and Glyndwr constituency and the Rhosllanerchrugog community, it is suggested that they are the same village in representation 9328. Both representations suggest these should be in the same constituency. We put them both in Montgomeryshire and Glyndwr and therefore restore ties improving the position under Rule 5 (1) d.
- 6.12 We therefore strongly support Montgomeryshire being kept intact and then adding to it the smallest area possible which is the Denbighshire ward of Llangollen and eleven Wrexham wards and the Penciau North, Pontciau South and Rhos wards of the community of Rhosllanerchrugog.

- 6.13 Making these adjustments enable the Wrexham constituency to include the wards of the Brymbo and Minera.
- 6.14 We note widespread opposition to these wards being included in Alyn & Deeside. These include for example, representations 8870, 8882, 8927, 8994, 9141, 9209, 9367, 9387, 9483, 9761, 9762, 9712, 9771, 9818, 9837, 9846, 10033.
- 6.15 We note in these representations the close links these two wards have with Wrexham. Particularly mention is made of Coedpoeth ward where these are broken in the proposal and restored in our alternative, this being more compliant with Rule 5 (1) d.
- 6.16 We note the representations from the two MPs who currently represent County Borough of Wrexham wards, Sarah Atherton, MP for Wrexham (9731) and Simon Baynes, MP for Clwyd South (9907). We also note the representations from the Councillor for Brymbo, Paul Rogers (9975) and a counter proposal relating to the two wards (9572). We note that Sarah Atherton, Simon Baynes and Paul Rogers all emphasised this point at the Wrexham public hearing. It was also reiterated at the Bangor public hearing by [REDACTED].
- 6.17 By including these two wards in Wrexham you ensure Wrexham County Borough is divided between two constituencies rather than three under the proposals and Alyn & Deeside is all included in one authority rather than two. Thus the position is considerably improved under Rule 5 (1) b.
- 6.18 We note there are a few proposals which would not include the whole of the existing Wrexham constituency with the proposed expanded constituency. We are pleased the Commission have built on the existing constituency and included every elector from the current constituency in the proposed constituency. This is most compliant with Rule 5 (1) c and we would strongly oppose any alteration to this.
- 6.19 We note that there are various alternative ways of then configuring the Alyn & Deeside constituency. Again, we believe it is right to include the whole of the existing constituency as it is compliant with Rule 5 (1) c.
- 6.20 However, we would add to it the Flint and Bagillt wards to the existing constituency. We note this receives support in a number of representations including 9002, 9499, 9755, 9860 amongst others.
- 6.21 You are then able to include wards with close ties to Mold to be reunited in the Delyn constituency.
- 6.22 We note in representation 9972 that they show the close ties of Mynydd Isa to Mold. They are within the Argoed ward and the ties of this ward to Mold are broken by the Commission and restored under our counter proposal, this improving the position under Rule 5 (1) d.
- 6.23 We note there are a number of objections to Ruthin being included within the proposed Delyn constituency. We understand this and hope that including other neighbouring Denbighshire wards with ties to Ruthin – Llanfair Dyffryn Clwyd/Gwyddelwern as well as Corwen and Llandrillo and excluding Flint and Bagillt will to some extent mitigate these concerns.
- 6.24 We note that there are a number of representations suggesting there should be a Clwyd West and a Clwyd East constituency. We note representation 9927 supports the separation of Rhyl and Prestatyn but calls for Rhyl to be part of Clwyd West and Prestatyn to be part of Clwyd East.
- 6.25 We note the representation of the MP for Vale of Clwyd, James Davies (9982) and the MP for Vale of Clwyd, Gareth Davies (10018) support these proposed changes. We note James Davies gave further evidence on this at the Wrexham public hearing.

- 6.26 We also note good support for our North Wales alteration in 9789, 9810, 9813, 9915, 9991, 10007, 10050 and 10069.
- 6.27 In respect of the Clwyd seat which would rename Clwyd West, we would just exclude the Llanfair Dyffryn Clwyd/Gwyddelwern ward.
- 6.28 We note there is some concern about Rhos on Sea being excluded because of its ties to Colwyn Bay. Representations 9426 objects, but to Rhos on Sea being included with Colwyn Bay.
- 6.29 We note there is a counter proposal supported by the MP for Clwyd West, David Jones MP (9708) and the MS for Clwyd West, Darren Millar (9709) to include Llandrillo yn Rhos in Clwyd.
- 6.30 We have some sympathy for this position but believe the consequential changes to Aberconwy are unacceptable. The constituency would be very large, stretching from Bangor to Denbigh and incorporate part of three local authorities (Gwynedd, Conwy and Denbighshire). We think this is unacceptable and is worse under Rule 5 (1) b.
- 6.31 We note the largest number of representations in Wales are in relation to the proposed Aberconwy constituency.
- 6.32 We note a large number of objections to linking Bangor with Aberconwy despite the fact that they have been in the same constituency up to 2010.
- 6.33 We also note that there is some support for this constituency. An example we would draw to the Commission's attention from Bangor is representation 8969.
- 6.34 We also note support for Aberconwy in representations 9707, 9782, 9783, 9830, 9836, 9900. We also note the support of Robin Millar, the MP for Aberconwy (9788).
- 6.35 It is good that once again, like Alyn & Deeside and Wrexham, the Aberconwy constituency has been kept totally intact in compliance with Rule 5 (1) c.
- 6.36 We also note that the Labour Party (10049) support the proposed Aberconwy constituency.
- 6.37 We note many of the objections are to the splitting of Bangor in contravention of Rule 5 (1) d.
- 6.38 We do believe there is merit in this argument and note that it is the exclusion of the Pentir ward from the proposed Aberconwy constituency which causes this split.
- 6.39 We note some counter proposals and the Liberal Democrats (9992) include this ward in Aberconwy.
- 6.40 Just excluding this ward from Dwyfor Meirionnydd would still leave Dwyfor Meirionnydd within quota. Including it in Aberconwy would also retain Aberconwy within quota and it would be unnecessary to exclude wards from Aberconwy as the Liberal Democrats suggest.
- 6.41 We would therefore have no objection to the one ward swap of Pentir ward from Dwyfor Meirionnydd to Aberconwy.
- 6.42 We also believe that Bangor might object to not being included in the name of the constituency and if an alternative name was suggested, Aberconwy and Bangor for example, we would have no objection.
- 6.43 We therefore support the proposed constituency of Dwyfor Meirionnydd possibly less the one ward of Pentir. We note that the constituency just includes wards from Gwynedd and that the existing constituency of Dwyfor Meirionnydd is kept intact like Aberconwy, Alyn & Deeside and Wrexham. This constituency is therefore most compliant with Rule 5 (1) b and c.

- 6.44 We note that in representation 9035, 9259 and 9591 they support the constituency but suggest a name change. If there was an alternative name which had greater support, we would have no objection.
- 6.45 We note there are a number of counter proposals, some of which try to address the Bangor/Aberconwy/Dwyfor Meirionnydd issue. We believe these are inferior to the proposal of the Commission.
- 6.46 We note the proposal of Plaid Cymru for North Wales (10021). Whilst they address this issue, they do so by proposing a large and unwieldy constituency consisting of four local authorities (Gwynedd, Powys, Conwy and Denbighshire). The Commission have proposed no four local authority constituencies and just two with three local authorities, which we reduce to one. Plaid Cymru also have Conwy local authority split between three constituencies rather than two under the proposals; Denbighshire split between four constituencies rather than three under the proposals; Flintshire split between three local authorities rather than two under the proposals; Powys split between three constituencies rather than two under the proposals. Wrexham thus improves from two to three but so do we. These proposals are therefore considerably worse under Rule 5 (1) b.
- 6.47 There are a number of counter proposals addressing joint North Wales issues. We have commented on a number of these proposals but would, once again, highlight the size of the proposed Montgomeryshire and Meirionnydd constituencies. We would draw attention to the size of the Meirionnydd Nant Conwy a Maldwyn proposed in representation 9766.
- 6.48 We note that in a few cases it has been suggested that Denbighshire should be a co-terminus constituency. Whilst we have sympathy with this as it is very compliant with Rule 5 (1) b, we believe the consequential knock-on effects are unacceptable.
- 6.49 We therefore believe the Commission have largely proposed a sensible North Wales but we would make a number of relatively minor changes to improve the position particularly in relation to Rule 5 (1) b and d.



## **7 COUNTER PROPOSALS**

- 7.1 We have commented on a number of counter proposals throughout the text of this response.
- 7.2 We particularly judge the Boundary Commission proposals and counter proposals on the basis of the Rules for Redistribution of Seats and in particular Rule 5 (1) b, local authority links and Rules 5 (1) c, existing constituencies.
- 7.3 We have tried therefore to assess the Boundary Commission proposals, the alternatives of the political parties and a number of counter proposals in terms of the local authority links and the number of moved electors. We have not commented on counter proposals which we believe are not credible or have proposed constituencies outside the permitted range.
- 7.4 We note that Plaid Cymru (10021) and the Welsh Green Party (9924) are considerably worse than the Commission in terms of both Rule 5 (1) b and c.
- 7.5 In terms of the other counter proposals we note that they are all worse than the Commission in terms of Rule 5 (1) c. Some are slightly better than the Commission in terms of Rule 5 (1) b. However, the best one in North Wales (9002) is at the expense of being the poorest North Wales counter proposal in terms of Rule 5 (1) c. The best overall counter proposal in terms of Rule 5 (1) b (9766) is also worse than the Commission in terms of Rule 5 (1) c.
- 7.6 We produce this as a table showing the number of retained electors and showing the local authority links for various alternatives.
- 7.7 On balance we believe we provide the best overall outcome particularly in relation to Rule 5 (1) b but also in respect of Rule 5 (1) c, retaining slightly more electors in their existing constituency.

## **8. CONCLUSION**

- 8.1 We commend to the Commission this document, our original document 9809 and our contributions at the public hearings in Cardiff and Aberystwyth.
- 8.2 From our original document we believe the representations lead to a few minor changes:
  - (a) incorporating a name change to the Brecon and Radnor constituency.
  - (b) A name change and possible inclusion of the Pentir ward in the proposed Aberconwy constituency
  - (c) A possible further alteration to Caerfyrddin and Llanelli to acknowledge wards with close ties to Carmarthen.
- 8.3 Other than these changes we believe our proposals offer the best balance between the rules and we commend them to the Commission.
- 8.4 We hope the Commission will revise their proposals in accordance with our suggestions. We look forward to commenting further on the revised proposals in due course.

## APPENDIX A

	BCW	CON	PLAID	LD	LAB	GREEN		BCW	BCW	CON	CON	PLAID	PLAID	LD	LD	LAB	LAB	GREEN	GREEN	
								Aberafan Porthcawl		2 Aberavon and Ogmore		Abergavenny, Brecon 2 and Radnor		Aberavon with Maesteg 2 and South East Swansea		3 Aberafan Porthcawl		Amman, Neath and the 2 Swansea Valleys		3
1 authority seats	16	18	12	17	16	10		Aberconwy		2 Aberconwy		2 Alyn & Deeside		1 Aberconwy		2 Aberconwy		2 Rhymney Valley		3
2 authority seats	13	12	17	12	13	14		Alyn and Deeside		2 Alyn and Deeside		1 Barry & Cardiff South		2 Alyn and Deeside		1 Alyn and Deeside		2 Caerphilly		3
3 authority seats	2	1	1	2	2	7		Blaenau Gwent and Rhymney		2 Rhymney		Blaenau Gwent and 2 Pontypool		2 Rhymney		2 Rhymney		2 Cardiff Bute		1
4 authority seats	0	0	1	0	0	0		Brecon and Radnor		2 Brecon and Radnor		2 Bridgend		1 South Montgomeryshire		1 Brecon and Radnor		2 Cardiff Llanishen		1
								Bridgend		1 Bridgend		1 Caerphilly		2 Bridgend		1 Bridgend		1 Cardiff St Fagans		1
								Caerfyrddin		1 Caerfyrddin		1 Cardiff Central & East		1 Caerfyrddin		1 Caerfyrddin		1 Carmarthenshire		2
Total retained electors	1584164	1596394	1442574	1616215	1601008	1352948		Cardiff Central		1 Cardiff Central		1 Cardiff North		1 Caerphilly		1 Cardiff Central		1 Ceredigion and the 1 Preselis		3
								Cardiff North		2 Cardiff North		1 Cardiff West		1 Cardiff Central		1 Cardiff North		2 Conwy Coast		2
	2270262	2270262	2270262	2270262	2270262	2270262		Cardiff South and Penarth		2 Penarth		2 Carmarthen & Dinefwr		1 Cardiff North		2 Penarth		2 Cwmbran and Pontypool		2
	69.8%	70.3%	63.5%	71.2%	70.5%	59.6%		Cardiff West		2 Cardiff West		2 Ceredigion & Preseli		2 Cardiff South and 2 Penarth		2 Cardiff West		2 Deeside		1
								Ceredigion Preseli		2 Ceredigion Preseli		2 Delyn		2 Cardiff West		2 Ceredigion Preseli		2 Denbighshire North		3
								Clwyd		2 Clwyd East		2 Llandudno & Colwyn		2 Ceredigion Preseli		2 Clwyd		2 Eifionydd		2
Blaenau Gwent	1	1	2	1	1	1		Delyn		2 Clwyd West		2 Llanelli		1 Clwyd West		2 Delyn		2 Gower		2
Bridgend	2	2	2	3	2	3		Dwyfor Meirionnydd		1 Dwyfor Meirionnydd		1 Lliw & Tawe		2 Delyn		2 Dwyfor Meirionnydd		1 Llanelli		1
								Gower and Swansea										Merthyr Tydfil and the		
Caerphilly	4	3	3	3	4	3		Islwyn		1 West		1 Maldwyn & Glynwdr		3 Dwyfor Meirionnydd		1 Islwyn		1 Northern Rhondda		2
Cardiff	4	4	5	4	4	5		Llanelli		1 Islwyn		1 Meirionnydd		4 Llanelli		1 Llanelli		1 Monmouthshire		3
								Merthyr Tydfil and Aberdare		3 Llanelli		1 Menai		2 Merthyr Tydfil and Upper Cynon		2 Merthyr Tydfil and Aberdare		3 Neath and Port Talbot		2
Carmarthenshire	2	2	2	2	2	4		Mid and South Pembrokeshire		1 Aberdare		2 Merthyr & Aberdare		2 Pembrokeshire		1 Pembrokeshire		1 Newport		1
Ceredigion	1	1	1	1	1	1		Mid and South Pembrokeshire		1 Mid and South Pembrokeshire		1 Mid & South Pembrokeshire		1 Monmouthshire		1 Monmouthshire		1 Ogmores Vale and Porthcawl		2
Conwy	2	2	3	2	2	3		Monmouthshire		1 Monmouthshire		1 Monmouthshire		1 Neath with North East		1 Monmouthshire		3 Pembrokeshire Coast		1
Denbighshire	3	3	4	3	3	3		Montgomeryshire and Glynwdr		3 Montgomeryshire and Glynwdr		1 Monmouth & Cwmbran		2 Swansea		2 Glynwdr				
Flintshire	2	2	3	2	2	3		Newport East		1 Clwyd South		3 Neath & Aberavon		1 Newport East		1 Newport East		1 Penarth and Barry		2
Gwynedd	2	2	2	2	2	2		Newport West and Caerphilly		2 Neath and Swansea East		2 Newport East		2 Newport West with 2 Islwyn		2 Newport West and 2 Caerphilly		2 Pencoed and the Vale of 2 Glamorgan		2
Merthyr Tydfil	1	1	2	1	1	3		Pontypridd		1 Newport East		1 Newport West		2 North Montgomeryshire 2 and Glynwdr		3 Pontypridd		1 Pontypridd		1
Monmouthshire	1	1	3	1	1	2		Newport West and Caerphilly		1 Newport West and 1 Caerphilly		2 Pontypridd		2 Pontypridd with Lower 2 Cynon		1 Rhondda		1 Senghenydd		1
								Swansea Central and North		1 Pontypridd		1 Porthcawl & The Vale of 1 Glamorgan		2 Rhondda with Ogmore		2 Swansea Central		1 Snowdonia and 1 Montgomeryshire North		2
Neath Port Talbot	3	3	2	2	3	3		Newport		2 Rhondda		1 Rhondda		1 Swansea North		2 Swansea East and Neath		2 Swansea		1
								Swansea East and Neath		1 Swansea Central and Gower		1 Sirhowy		2 Swansea West and 2 Gower		1 Swansea West and 1 Gower		1 The Brecon Beacons and 1 Montgomeryshire South		2
Pembrokeshire	2	2	2	2	2	3		Powys		1 Torfaen		1 Swansea East		1 Torfaen		1 Torfaen		1 The Southern Rhondda		2
																		1 The Welsh Marches and 1 Wrexham South		3
Rhondda Cynon Taf	5	4	3	5	5	3		Vale of Glamorgan		1 Vale of Glamorgan		1 Swansea West & Gower		1 Vale of Glamorgan		1 Vale of Glamorgan		1 Wrexham North and 1 Mold		2
Swansea	3	3	3	4	3	3		Wrexham		1 Wrexham		1 Wrexham		2 Wrexham		1 Wrexham				
Torfaen	1	1	2	1	1	2				48		45		53		47		48		59
Vale of Glamorgan	2	2	2	2	2	2														
Wrexham	3	2	2	2	3	2														
	48	45	53	47	48	59														

## APPENDIX B

	R 9766	R 9822	R 9875	R 9952	R 10055	R 10070		R 9766	R 9766	R 9822	R 9822	R 9875	R 9875	R 9952	R 9952	R 10055	R 10055	R 10055	R 10070	R 10070
								Barry	1	Aberafan Porthcawl	2	(Aberavon)		Aberavon and Porthcawl	2	Aberavon		Blaenau Gwent and Rhymney	2	
1 authority seats	19	18	16	17	16	16		Blaenau Gwent and Rhymney	2	Alun	2	(Arfon Dwyfor)		2 Alyn and Deeside	2	Aberdare		1 Brecon and Radnor	3	
2 authority seats	11	11	13	13	14	14		Brecon, Radnor and Newtown	1	Arfon Dwyfor	2	(Blaenau Gwent and Rhymney)	2	Bangor and Conwy	2	Bae Ceredigion		2 Bridgend	1	
3 authority seats	1	2	2	0	1	1		Bridgend	2	North Islwyn	1	(Bridgend)	1	Brecon and Radnor	1	Barry and Penarth		1 Caernarfon	2	
4 authority seats	0	0	0	1	0	0		Caerfyrddin	1	Bridgend	1	(Bridgend)	1	Brecon and Radnor	1	Brecon and Radnor		1 Cardiff East	2	
								Caernarfon	2	Caerfyrddin	1	(Caerfyrddin)	1	Bridgend	1	Bridgend		2 Cardiff North	1	
								Cardiff North	1	Caerphilly and Rhymney Valley	1	(Cardiff Central and North East)	1	Cardiff Central	1	Caerfyrddin		Cardiff South and Penarth	2	
Total retained electors	1497997	1435042	1569074	1553415	1511974	1537576		Cardiff South East	1	Cardiff North East	1	(Cardiff North West)	2	Cardiff North	2	Cardiff North		2 Cardiff West	1	
								Cardiff West	1	Cardiff North West	2	(Cardiff South and Penarth)	3	Cardiff South and Penarth	2	Cardiff South		1 Carmarthen	2	
	2270262	2270262	2270262	2270262	2270262	2270262		Ceredigion a Phreseli	2	Cardiff South East	1	(Cardiff West and Llantrisant)	2	Cardiff West	1	Cardiff West		1 Ceredigion Preseli	2	
	66.0%	63.2%	69.1%	68.4%	66.6%	67.7%		Conwy Coast	1	Cardiff North East	2	(Ceredigion Preseli)	2	Carmarthen	1	Denbigh		2 Conwy	1	
								Denbigh Flint	1	Ceredigion Preseli	2	(Conwy Coast)	1	Pembrokeshire	2	Ebbw Vale		2 Denbighshire	2	
									1	Deeside	1	(Deeside)	1	Delyn	1	Flint		1 East Flintshire	2	
Blaenau Gwent	1	1	1	1	1	1		Gower	1	Denbighshire	1	(Delyn)	2	Montgomery	4	Gower		1 Gower	1	
Bridgend	2	3	3	3	3	2		Islwyn	1	Llandudno and Colwyn Bay	1	(Islwyn)	1	Meirionnydd	1	Llandudno		2 Gelligaer	1	
Caerphilly	3	3	3	3	4	3		Llanelli	1	Llanelli Dyffryn Aman	3	(Llanelli)	1	Swansea West	1	Llanelli		1 Llanelli	1	
Cardiff	4	4	4	4	4	4		Meirionnydd Nant Conwy a Maldwyn	3	Maldwyn	3	(Merioneth and Snowdonia)	3	Islwyn	1	Meirionnydd a		Merthyr Tydfil and	2	
Carmarthenshire	2	2	2	2	2	2		Merthyr Tydfil and Aberdare	2	Merthyr Tydfil and Aberdare	2	(Merthyr Tydfil and Aberdare)	2	Llanelli	2	Rhymney		2 Pembrokeshire	1	
Ceredigion	1	1	1	1	2	1		Mold and Alyn	2	Mid and South Pembrokeshire	1	(Mid and South Pembrokeshire)	1	Aberdare	2	Mid Cardiff		1 Monmouthshire	1	
Conwy	3	3	3	3	2	3		Monmouth	1	Mid and South Powys	1	(Monmouthshire)	1	Pembrokeshire	1	Monmouth		1 Montgomeryshire	2	
Denbighshire	1	1	2	2	2	2		Neath	2	Monmouthshire	1	(Montgomeryshire and Clwyd South)	2	Monmouthshire	1	Montgomery		2 Neath and Kilvey	2	
Flintshire	2	2	3	2	3	2		Newport East	1	Neath and Swansea East	2	(Newport East)	1	Neath	2	Neath		2 Newport East	1	
Gwynedd	2	2	2	2	2	2		Newport West and Caerphilly	2	Newport East	1	(Newport West and Caerphilly)	2	Newport East	1	Newport East		1 Newport West and	2	
Merthyr Tydfil	1	1	1	1	1	1		Ogmore	2	Newport West and South Islwyn	2	(Pontypridd)	1	Caerphilly	2	Risca		2 Pontypridd	1	
Monmouthshire	1	1	1	1	1	1		Pembroke	1	Pontypridd	1	(Rhondda and Ogmore East)	2	Pontypridd	1	Ogmore		2 Maesteg	2	
Neath Port Talbot	2	3	2	2	2	4		Pontypridd and Rhondda and Cardiff North West	2	Rhondda and Cardiff North West	2	(Swansea Central and Neath)	1	Ogmore	2	Pembroke		1 Rhondda	1	
Newport	2	2	3	2	2	3		Rhondda and Mountain Ash	1	Swansea Central	1	(Swansea East and Neath)	2	Rhyl and Colwyn	2	Pontypool		1 Swansea	1	
Pembrokeshire	2	2	2	2	2	2		Swansea Central	1	Swansea West	1	(Swansea West and Gower)	1	Swansea East	1	Pontypridd		1 Torfaen	1	
Powys	2	2	2	2	3	2		Swansea East and Port Talbot	2	Torfaen	1	(Torfaen)	1	Torfaen	1	Prestatyn		2 Vale of Glamorgan	1	
Rhondda Cynon Taf	4	4	5	4	3	3		Torfaen	1	Vale of Glamorgan	1	(Vale of Glamorgan)	1	Vale of Glamorgan	2	Swansea		1 West Flintshire	1	
Swansea	4	4	3	4	3	4		Wrexham	1	Wrexham	1	(Wrexham)	2	Wrexham	1	Wrexham		2 Wrexham	2	
Torfaen	1	1	1	1	1	1			44		46		48		47					
Vale of Glamorgan	2	2	2	2	2	2														
Wrexham	2	2	2	3	2	2														
	44	46	48	47	47	47														

## APPENDIX C

	BCW	R 9002	R 9414	R 9991	R 10066				BCW	BCW	R 9002	R 9002	R 9414	R 9414	R 9991	R 9991	R 10066	R 10066
									Aberconwy	2	Aberconwy	1	(Alyn and Deeside)	1	Aberconwy	2	(Alyn and Deeside)	1
1 authority seats	2	2	2	3	1				Alyn and Deeside	2	Alyn	2	(Arfon Dwyfor)	2	Alyn and Deeside	1	(Arfon Dwyfor)	2
2 authority seats	4	5	4	2	5				Clwyd	2	Delyn and Deeside	1	(Clwyd South)	4	Clwyd North	2	(Conwy Coast)	2
3 authority seats	1	0	0	2	0				Delyn	2	Dwyfor Arfon	2	(Delyn)	2	Clwyd West	3	(Delyn)	2
4 authority seats	0	0	1	0	1				Dwyfor Meirionnydd	1	Montgomeryshire and Meirionnydd	2	(Montgomery and Merioneth)	2	Dwyfor Meirionnydd	1	(Montgomery East and Glyndwr)	2
									Montgomeryshire and Glyndwr	3	Vale of Clwyd Wrexham and Glyndwr	2	(North Wales Coast)	2	Montgomery	3	(Montgomeryshire West, Merioneth and Snowdonia)	4
									Wrexham	1	Glyndwr	2	(Wrexham)	1	Wrexham	1	(Wrexham)	2
Total retained electors	340465	292436	312602	347646	294907					13		12		14		13		15
	516428	516428	516428	516428	516428													
	65.9%	56.6%	60.5%	67.3%	57.1%													
Conwy	2	3	3	2	3													
Denbighshire	3	2	3	3	3													
Flintshire	2	2	3	3	3													
Gwynedd	2	2	2	2	2													
Powys	1	1	1	1	2													
Wrexham	3	2	2	2	2													
	13	12	14	13	15													
* Powys number does not include Brecon and Radnor																		



**BCW-10209/** [REDACTED] **/ Swansea**

**From:** [REDACTED]

**Sent:** [REDACTED] arch 2022 10:02

**To:** BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>

**Subject:** Proposals for the Parliamentary Boundary of Swansea West and Gower

Dear Sirs

I write with regard to the Boundary Commission's proposals for the Parliamentary seat of Swansea West and Gower.

I wish to record my full support for the proposal.

In previous years the Gower Parliamentary boundary has been an anomaly. Rural communities in the peninsula itself have been joined with former industrial communities in the Swansea Valley with which they have no links or ties. Clydach, which is a natural extension of the Morriston community, was in Gower whilst Morriston was in Swansea East. This is plainly absurd.

The Boundary Commission's proposal address this anomaly by linking the rural communities of the peninsular with the western suburbs of Swansea which makes more sense.

The Mumbles community, which was moved from Swansea West to Gower in 1979, is reunited with the Swansea West ward of Mayals which forms part of the Mumbles Community Council area.

There are strong links between West Cross, Sketty and Mayals and it is only right that these communities are placed in the same constituency.

Also the A4216 Cockett Road is a natural boundary between the Sketty and Cockett communities on one side (Swansea West & Gower) and the Uplands and Townhill communities (Swansea Central & North).

I hope the proposed boundaries will be agreed without

amendment. Many thanks

[REDACTED]

**BCW-10210/ Cllr Julie Sangani/ Cardiff**

**From:** [REDACTED]

**Sent:** 30 March 2022 11:02

**To:** BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>

**Subject:** I am sharing 'Document for Wales Boundary

Hi

Please find attached response.

Kind Regards  
Cllr Julie Sangani



Dear Commission

28<sup>th</sup> March 2022

I am writing as a local councillor, resident and local authority appointed governor of Ton yr Ywen Primary School. This submission relates to the Commission's Initial Proposals for Cardiff North and I will briefly reference the three other adjoining seats in Cardiff – Cardiff Central, Cardiff West and Cardiff South and Penarth. This submission also addresses the counter-proposals put forward during the consultation period relating to Cardiff North.

I welcome the Initial Proposals for the constituency of Cardiff North which would see the constituency remain largely intact, with the addition of Taff's Well. I also welcome the Initial Proposals made for Cardiff West, Cardiff Central and Cardiff South and Penarth which, as a whole, would entail just two wards within Cardiff moving constituency. Appreciating that Cardiff Central is under-sized and Cardiff South and Penarth is over-sized, the proposal to add Rumney and Llanrumney wards to Cardiff Central is sensible and welcome.

The proposal to keep Cardiff North whole with the addition of Taff's Well acknowledges the geographical links with the natural boundary of the Taff River and given good transport links between Taff's Well and the north of Cardiff, Taff's Well would seem a natural addition to the constituency.

The counter-proposal put forward by the Conservative Party does not recognise or respect the existing and longstanding community links in Cardiff North. Llandaff North and Whitchurch feel very connected as communities. The two wards share amenities, schools, green spaces and public transport links. Llandaff North looks to Whitchurch as its main shopping district.

The natural boundary of the Taff River separates Llandaff North from Llandaff in Cardiff West which has few transport links and no sense of connection to each other. The two communities on opposite sides of the river have little in common other than in name and so the proposal to move Llandaff North to Cardiff West is neither sensible nor does it recognise the existing local ties. Moving Llandaff North to Cardiff West would also halve one of the oldest housing estates in Wales. Mynachdy is partly in Gabalfa. Gabalfa, Llandaff North and Whitchurch are all linked and accessed via the Gabalfa roundabout.

There is also no natural connection between Cardiff North and Trowbridge. This counter-proposal ignores the significant local ties between the wards of Llandaff North, Gabalfa and Whitchurch and the subsequent limited transport links between Trowbridge and north Cardiff. This proposal ignores the local ties that must be recognised under Rule 5 Schedule 2 of the Act.

The counter-proposal that would see Gabalfa and the Heath move to Cardiff Central also fails to take into consideration the strong local ties that exist in these wards. As neighbouring wards, the Heath is closely tied to Llanishen in transport, school catchment areas, leisure centres, the Cardiff Lifestyle Park, sports clubs, community centres, green spaces and much more, but Llanishen would stay within Cardiff North, creating an illogical and unnatural separation.

In conclusion, I support the Boundary Commission's Initial Proposals and reject the counter proposals as set out above. The Boundary Commission's proposals are respectful of local ties and are the least disruptive in nature, only proposing to move two wards in Cardiff instead of three or five as set out in the counter-proposals.

Thank you for giving this your consideration.

Your sincerely,  
Cllr Julie Sangani

BCW-10211/[REDACTED] / Unknown

**From:** [REDACTED]  
**Sent:** 30 March 2022 11:53  
**To:** BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>  
**Subject:** submission

Please find attached my comments about the proposed changes.

Diolch,

[REDACTED]

TO WHOM IT MAY CONCERN,

This submission will comment on the Commission's initial proposals, the counterproposals and their compliance with the statutory factors in section 3.4 of the Commission's Guide to the 2023 Review.

Rule 5 in Schedule 2 of the Act specifies that the following factors may be considered as the Commission develops proposals

- special geographical considerations, including, in particular, the size, shape and
- accessibility of a constituency
- local government boundaries that existed or were prospective on 1 December 2020
- boundaries of existing constituencies
- any 'local ties' that would be broken by changes in constituencies
- the inconveniences attendant on such changes.

This Boundary Review and its proposals are limited by the requirement to meet the Electoral Quota (EQ) framework and the number of electors on the register as December 2020. My submission is therefore restrained by that.

### **Initial Proposals**

I welcome the Commission's initial proposals for the constituency of Cardiff Central as a resident. Equally I welcome the proposals that have been made for Cardiff North, Cardiff West and Cardiff South and Penarth.

The typically large electorates of wards in Cardiff do reduce the number of options available to the Commission. Given that the Cardiff Central constituency is under-sized and the Cardiff South and Penarth constituency is over-sized, the logical extension of the current Cardiff Central constituency with the addition of the Rumney and Llanrumney wards is sensible and is therefore welcomed.

I would add that the Commission is right to recognise areas with existing community links already within Cardiff Central:

### **Cathays and Plasnewydd**

Cathays and Plasnewydd have many community ties. They are overwhelmingly the two primary wards where the very substantial student population from Cardiff University, Cardiff Metropolitan University and the Cardiff campus of the University of South Wales lives. The secondary school catchment area for Cathays High School includes parts of Plasnewydd.

The community connections across Cathays, Plasnewydd and indeed Penylan and parts of Cyncoed are such that residents in all three electoral wards consider themselves part of the Roath community around the shopping districts of Crwys Rd, Albany Rd and City Rd. These community links, including the public transport links out of the City centre, are long-standing and are correctly respected by the Commission's initial proposals.

The children at primary schools in Cathays and Plasnewydd attend Cathays High School, Bro Edern (situated in Penylan) or Cardiff High School (situated in Cyncoed).

### **Plasnewydd /Roath and Penylan**

Many residents of Penylan and Plasnewydd consider themselves to be part of the Roath community and the place name “Roath” is very well established and understood. It is seen on school names, Roath Park Primary School, and on our landmark geographical features such as Roath Recreation Ground, “The Rec.” which is in the Penylan ward.

The electors of Penylan look towards the shopping district of Albany Road and Wellfield Road in Plasnewydd. The children at primary schools in Penylan attend Cathays High School travelling along Albany Road and Crwys Road main thoroughfares on their journeys to school.

#### Penylan and Cyncoed

Many residents of Penylan and parts of Cyncoed consider themselves to be part of the Roath community and the place name “Roath” is very well established and understood. It is seen on our landmark geographical features such as Roath Park and Roath Park Lake, both geographically being within the Cyncoed ward. Residents of both wards look to Albany Road and Wellfield Road particularly for their shopping and other amenities.

#### Rumney and Llanrumney

The Commission’s proposed inclusion of Rumney and Llanrumney within Cardiff Central builds on both wards already having very good and well-established transport links, both road and public transport, to the existing Cardiff Central constituency. Newport Road is the main road from Llanrumney, through Rumney, through both Penylan and Adamsdown and into Cathays. Rumney and Llanrumney are wards with deep and extensive local ties to each other. The school catchment areas for Llanrumney and Rumney are inter-linked at Eastern High school. The main recreation area, is the Rumney Recreation Ground, situated in Llanrumney.

#### **Counter- Proposals**

Several counterproposals relating to Cardiff Central and the adjoining three Cardiff constituencies have been made. Having read the counter-proposals and listened to the oral evidence and questions and answers relating to them at the Commission’s hearing in Cardiff on Thursday 17<sup>th</sup> February 2022, I suggest that they do not represent better solutions and I outline below, the areas within each proposal that fail to meet the factors outlined in Rule 5, Schedule 2 of the Act.

#### **Conservative Party Counter Proposal**

This suggests (without any apparent compelling reasoning) removing Riverside ward, which is situated on the west of the River Taff, from the Cardiff West constituency and adding it to the Cardiff Central constituency.

It is difficult to discern any logic in these proposals in comparison with the Commission’s initial proposal, which meets rule 5 criteria in terms of existing constituencies and geographical considerations by retaining the whole of the current Cardiff West seat located on the west of the River Taff.

Riverside ward is in fact very different in character to the city centre (Cathays ward), all of which is on the east of the Taff. The city centre consists mainly of commercial properties (shops, restaurants, bars, offices, the stadium, the castle, the railway station etc) with some city centre apartments.

Riverside ward is mainly residential and despite its name extends a long way from the immediate vicinity of the river. South Riverside is one of Wales's most diverse areas, with very close local ties to neighbouring Canton with the district shopping area of Cowbridge Road East (which is also the main bus route) forming a spine linking the 2 wards.

Most local people go to shop along Cowbridge Road rather than the city centre. In fact the Riverside ward covers large parts of the area which most local residents would regard as Canton, ending as it does at Leckwith and Llandaff Roads. Where Canton and Riverside wards meet near the historic crossroads on Cowbridge Road East is the place local residents regard as the heart of the Canton community.

The Pontcanna part adds to Riverside ward's unique diversity by being the home to a large number Welsh speakers as increasingly is neighbouring Canton. Children from Riverside ward overwhelmingly attend schools in the west of the city. At secondary level predominantly they attend the highly diverse Fitzalan High School (Canton Ward), the Welsh medium Ysgol Gyfun Plasmawr (Fairwater), and Church in Wales Bishop of Llandaff Church in Wales School (Llandaff).

In practice there are very few community links across the river, as the residential areas of Riverside and the Cardiff Central residential areas are separated, not only by the very significant geographical presence of the River Taff, but by the commercial city centre, the civic centre, and large swathes of park land.

This counter proposal also involves moving the Rumney and Llanrumney wards into two different constituencies. This again ignores the significant local ties between the wards. The school catchment areas for Llanrumney and Rumney are inter-linked at Eastern High school.

This proposal moves Llanrumney into a revised Cardiff North constituency. There are no particularly strong links between Llanrumney and Pontprennau & Old St Mellons. Indeed, the transport links are extremely limited between Llanrumney and Cardiff North. In practice there are no particularly strong community links at all between these two wards, and the proposal to move the wards of Llanrumney and Rumney into different constituencies is completely contrary to Rule 5 and respecting local ties.

This counter-proposal also involves a total of three electoral wards within Cardiff moving from their current constituencies; compared to the two wards affected by the Commission's Initial Proposals.

### **Liberal Democrat Counter Proposal**

The Liberal Democrats' counter proposal involves moving a significantly higher number of wards between existing constituencies in Cardiff. This counter-proposal, which returns Rumney and Llanrumney to Cardiff South and adds Gabalfa and the Heath to Cardiff Central again fails to take into account the strong local ties that exist.

The Gabalfa ward is very closely linked into the Llandaff North ward. Indeed, the Gabalfa Estate, one of the oldest housing estates in Wales, straddles these two wards. The Gabalfa roundabout brings together the communities of Whitchurch and Gabalfa. Residents in both Gabalfa and Llandaff North look towards the shopping district of Merthyr Road in Whitchurch.

The Heath ward borders the Llanishen ward. The two communities are closely tied, not just by transport links, but by school catchment areas, services and amenities. Given the close proximity of schools such as Ton Yr Ywen in Heath, many children living close by in Llanishen attend. The two wards have good transport links, with a train line running through. Both wards share access to amenities such as Llanishen Lesiure Centre, Cardiff Lifestyle Park, Sports Clubs, Community Centres, green spaces and much more.

### **Summary**

Rule 5 in Schedule 2 of the Act specifies a number of factors that the Commission may take into account.

### **Boundaries of existing constituencies**

The initial proposals from the Commission move two wards from existing constituencies.

The counter proposals from the Conservatives move three.

The counter proposals from the Liberal Democrats move five wards within Cardiff into a different constituency.

Neither of these proposals are a better solution than the Commission's initial proposals. In fact, both are a worse solution.

### **Any 'local ties' that would be broken by changes in constituencies**

As is outlined above, the 'local ties' impacted by the Conservative counter-proposal are significant in regards to the impact of their proposals on Riverside, Llandaff North and Llanrumney.

The 'local ties' impacted by the Liberal Democrats' proposal are significant in relation to Gabalfa, Heath, Llanrumney, Radyr and Pentyrch.


Neither of these proposals are a better solution than the Commission's initial proposals. In fact, both are a worse solution with the Liberal Democrats' solution being significantly worse for the reasons set out above.

### **Conclusion**

I accept that there are some concerns about the links between Trowbridge and Splott in the initial set of proposals. However, as set out above, the various counterproposals all have greater failings in adhering to the statutory factors contained in Rule 5, Schedule 2.

I therefore submit that the Commission should reject the counter proposals.

The Commission's proposals for the four parliamentary constituencies in Cardiff meet both the electoral quota as defined by the Act but are also the least disruptive proposals based both on the statutory factors and special geographical considerations within the Act.

  
Penylan resident

**BCW-10212/ [REDACTED] / Swansea**

**From:** [REDACTED]  
**Sent:** 30 March 2022 12:10  
**To:** BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>  
**Subject:** Swansea West and Gower Constituency

I wish to declare my support for the Parliamentary Boundary Commission proposals for the new Swansea West and Gower Constituency.

I have lived in Sketty for the majority of my years in Swansea, since my parents moved here from Lincoln in 1959.

In my opinion the residents of Sketty have always thought of themselves as part of a community that takes a large part of its identity from being to the west of Swansea and identifies with Mumbles, Oystermouth, Mayals, Killay and Gower more than it does with being part of the city centre of Swansea.

Sketty, like the other western communities above, has its own distinctive identity which is not town based.

It has a community shopping area, plus restaurants, two large Comprehensive schools, two Primary schools, a large further education college and a University within its boundaries.

Not to mention the largest public park and a renowned Botanical Gardens that links most of Sketty to the seashore.

Sketty most definitely looks to the west rather than to town for its identity.

Your proposals are eminently sensible in that they unite all the communities to the west of Swansea into one constituency, not splitting them up as the previous arrangement did.

There is definitely a dividing line between the western areas of Swansea and the town areas. That line is between Sketty and, to the east, Uplands and Brynmill.

The only change that I would make to your proposals is that the name of the constituency should be Gower and Swansea West.

My reasons for that are:

- 1) it runs off the tongue more easily,
- 2) it emphasizes the link between Gower and the western communities,
- 3) it restores the ancient link between Gower and Swansea other than the town itself.

[REDACTED]  
A resident of Sketty,  
A Sketty ward Councillor 2017-2022.

**BCW-10213/ Cllr Myles Langstone- Conservative Group City & County of Swansea Council/ Swansea**

**From:** [REDACTED]

**Sent:** 30 March 2022 13:04

**To:** BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>

**Subject:** Consultation Response - Swansea West & Gower

As Deputy Leader of the Conservative Group (City & County of Swansea Council), I would like to support your proposals for the Swansea West and Gower Constituency and highlight a few important points.

We fully support the proposal to re-connect the Community of Mumbles.

Currently, Newton, Oystermouth and West Cross are part of the Mumbles Community Council area and are in the Gower Parliamentary Constituency, but Mayals, whilst being part of the Mumbles Community Council, is in the Swansea West Constituency.

This is an anomaly which wrongly splits the important and iconic Community of Mumbles. It also means two different MPs and two different constituency Senedd members.

Naturally, residents in Mayals are a part of the Mumbles community. I have lived in both Mayals and Oystermouth wards and it is absolutely clear that this is one community. It is only right that this is reflected, too, by the boundaries for the area. Under your proposals the Community of Mumbles will be united in one constituency, which is long overdue.

However, one change we would suggest is to call the new constituency Gower and Swansea West and not Swansea West and Gower.

The Gower part of the constituency makes up the largest part of the new constituency (Gower has 58.4% of the constituency as opposed to Swansea West having 41.6%).

Gower is also the first Area of Natural Beauty and this deserves to be reflected in the naming of the constituency.

Kind regards,

**Cllr. Myles Langstone**



The existing Swansea West constituency runs westwards from the River Tawe reaching into the Gower.

An alternative is to reconnect local ties and convenience, to reflect the geography and respect existing boundaries.

- A. Keeping the four wards in the original Gower seat– Pontardulais , Mawr ( Llangyfelach and Penllergaer, within the Swansea West & Gower constituency instead of them being moved into Swansea Central and North
- B. relocate two wards originally in the Swansea West constituency - Sketty and Mayals to re-join Uplands in Swansea Central and North
- C. Move Morriston from Swansea Central and North into Swansea East and Neath in exchange for Bonymaen and St.Thomas
- D . This would give the new Swansea West and Gower constituency 74653 voters
- E. the new Swansea Central and North would have 75,560 voters

Factors that will be considered:-

The coast and the River Tawe are natural boundaries for the existing Swansea West constituency. West of the River Tawe, the Castle, Uplands, Sketty and Mayals wards run seamlessly into each and are geographically contiguous along the coast. Therefore, they should remain connected together within the same constituency. Adding St.Thomas and Bonymaen would continue the coastal frontage to the east of the River Tawe.

These proposals greatly respects the existing and established constituency boundaries of Gower and Swansea West. All wards fall within the City and County of Swansea local authority.

These suggestions reinforces the Local ties sustains established communities

Inconvenience

It follows from the above that the unamended BCW proposal would create avoidable inconvenience by splitting the student, Muslim and other communities.

I am writing to you as a Resident of Rhayader in respect of the proposals for Brecon and Radnorshire and to support the Lib Dem suggestion to merge with parts of Montgomeryshire. As a long term resident, all my children went to Llanidloes High School and many from the town continue to do so. There are strong social ties between the two towns at a sporting and arts level too.

However, I am most concerned about the impact of combining a predominantly urban set of wards into a largely rural constituency. These changes would mean almost a third of the electorate would be found within a very small geographic area relative to the rest of the constituency which would lead to a strong pull for the MP office that way. At present, those without transport only have to make a single bus trip to reach an office but a move to Brecon would make it two and Ystradgynlais three if they actually needed to go into the office.

I'm also worried that this extra area is in a different council area with different police and health board. Won't this mean the MP and their staff will have to build up multiple sets of contacts and will they have them all if I need them. Surely it is better to keep to council boundaries where possible. You have already created links further north for Montgomeryshire so why don't you take advantage of what the Lib Dems suggest and make at least one of the Powys seats entirely within the council area and allow the MP to focus on rural issues not get dragged into urban valleys ones as well.

## **BCW-10216/ Cllr Phillipa Marsden/ Crosskeys**

The changes being proposed for the merger for Caerphilly and Newport West are so drastic that I felt compelled to respond to the consultation, given that the deadline is very close I am unable to offer a fully formed counter proposal but I would like to share my sense of concern.

I live in Islwyn Constituency and as a County Councillor for CCBC we make decisions for all in Caerphilly, Islwyn and for the Rhymney part of the Merthyr Tydfil & Rhymney constituencies, the fact that two constituencies sit in their entirety within the LA's boundaries that is very helpful for democratic decisions, knowledge and connectivity.

The merging of Newport West and Caerphilly is not a sound proposal.

It seems that the wholesale reduction is based on drawing lines on a map without any consideration to the communities within and I would argue that it does not help with democracy.

What have these communities got in common, nothing. Historically they are not connected e.g. Ridgeway to Senghenydd and Coedkernew to Abertridwr? Valley communities are distinct and it is important to recognize the social history of all these places and that goes for Newport too.

Will all the new LDP's been considered as these are in the process of being drawn up and they would therefore have an element for housing growth. Have these been taken into to consideration too?

What would the merging of Newport West and Newport East look like? Is that a potential option, if needs be taking from the outer edges of Newport moving out in concentric circles as these communities do have connections and could be placed together to further bolster either Islwyn and/or Caerphilly taking the out lying areas such Rhiwderin and Craig going into Caerphilly and Rogerstone going into Islwyn.

If the lower limits could be applied to the valley seats because of the unique communities and the topography we would have a fairer distribution across all those constituencies would that be more acceptable? It seems that to sacrifice so many seats is a backward step. So I ask that an alternative approach is found to create a more even spread across all the constituencies in Wales.

Many thanks

**BCW-10217/ Julie Morgan MS/ Cardiff**

**From:** [REDACTED]

**Sent:** 30 March 2022 13:49

**To:** BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>

**Subject:** Julie Morgan MS - Submission to the Boundary Commission for Wales for the Second Consultation Period

Good afternoon

Please find attached my submission to the Boundary Commission for Wales for the Second Consultation Period.

I would be grateful if it could be given due consideration.

Best wishes,  
Julie

**Julie Morgan AS/MS**  
**Aelod o'r Senedd dros Ogledd Caerdydd**  
**Member of the Senedd for Cardiff North**

**Julie Morgan**

Aelod o'r Senedd dros  
Ogledydd Caerdydd

—  
Member of the Senedd for  
Cardiff North

Swyddfa'r Etholaeth

Constituency Office

By email: [bcw@boundaries.wales](mailto:bcw@boundaries.wales)

30 March 2022

Dear Commission

I write as the Member of the Senedd for Cardiff North regarding the Commission's Initial Proposals for the Cardiff North Parliamentary constituency boundary. I have represented the constituency of Cardiff North for 24 years, both as an MP and as an MS, so I know the communities that make up the current constituency extremely well.

I welcome the Initial Proposals for the constituency of Cardiff North which would see the constituency remain intact, with the addition of Taff's Well. I also welcome the Initial Proposals made for Cardiff West, Cardiff Central and Cardiff South and Penarth which, as a whole, would entail just two wards within Cardiff moving constituency. As Cardiff Central is under-sized and Cardiff South and Penarth is over-sized, it is right to propose that Rumney and Llanrumney wards be added to Cardiff Central.

The proposal to keep Cardiff North whole with the addition of Taff's Well acknowledges the geographical links with the natural boundary of the River Taff and given the good transport links between Taff's Well and the north of Cardiff, Taff's Well would seem a natural addition to the constituency.

The counter-proposal put forward by the Conservative Party does not acknowledge or respect the existing and longstanding community links in Cardiff North. Llandaff North and Whitchurch are very connected as communities. The two wards share amenities, schools, green spaces and public transport links. Llandaff North looks to Whitchurch as its main shopping district.

The natural boundary of the River Taff separates Llandaff North from Llandaff in Cardiff West which has few transport links and no sense of connection to each other. The two communities, on opposite sides of the river, have little in common other than in name and so the proposal to move Llandaff North to Cardiff West is neither sensible nor does it recognise the existing local ties. Moving Llandaff North to Cardiff West would also halve one of the oldest housing estates in Wales - Mynachdy - which



**Senedd Cymru**  
**Welsh Parliament**

is partly in Gabalfa. The construction of Western Avenue has already divided the Mynachdy estate, so splitting the constituencies that represent the estate would further segregate the community that lives there. Gabalfa, Llandaff North and Whitchurch are all linked and accessed via the Gabalfa roundabout.

There is also no natural connection between Cardiff North and Llanrumney. This counter-proposal ignores the significant local ties between the wards of Llandaff North, Gabalfa and Whitchurch and the subsequent limited transport links between Llanrumney and north Cardiff. This proposal ignores the local ties that must be recognised under Rule 5 Schedule 2 of the Act.

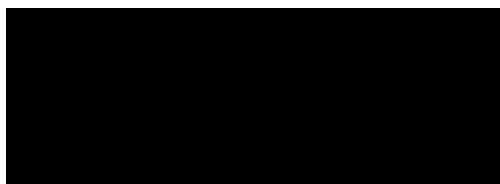
The counter-proposal that would see Gabalfa and the Heath move to Cardiff Central also fails to take into consideration the strong local ties that exist in these wards. As neighbouring wards, the Heath is closely tied to Llanishen in transport, school catchment areas, leisure centres, the Cardiff Lifestyle Park, sports clubs, community centres, green spaces and much more, but Llanishen would stay within Cardiff North, creating an illogical and unnatural separation.

The Boundary Commission's Initial Proposals of keeping the existing Cardiff North boundaries intact, with the addition of Taff's Well, would also mean that the Senedd constituency boundaries and Parliamentary constituency boundaries would be mirrored, with the only exception of Taff's Well. Should the boundaries be changed further, such as counter-proposed above, the Senedd and Parliamentary constituency of Cardiff North would be so different that, although representing the same constituency in name, the MS and MP would be representing vastly different communities.

In conclusion, I support the Boundary Commission's Initial Proposals and reject the counter proposals as set out above. The Boundary Commission's proposals are respectful of local ties and are the least disruptive in nature, only proposing to move two wards in Cardiff instead of three or five as set out in the counter-proposals.

Thank you for giving this your consideration.

Yours sincerely,



Julie Morgan

Member of the Senedd for Cardiff North

**BCW-10218/ Chris Elmore MP/ Ogmore**

**From:** [REDACTED]

**Sent:** 30 March 2022 14:11

**To:** BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>

**Subject:** Chris Elmore MP Submission

Dear Team,

I am just sending across Chris Elmore MP's submission for the Boundary Commission Consultation. If there are any issues at all, please let me know.

Best wishes,

[REDACTED]



[REDACTED]

Parliamentary Assistant

**Chris Elmore MP**

Member of Parliament for Ogmore

Shadow Minister for Media, Data & Digital Infrastructure

### Opening remarks

The Boundary Commission's job is a difficult one given the strictness of the Act. The Commission is tied by the remit it has been set, including being unable to avoid constituencies that sit across more than one local authority boundary.

The challenge of the topography and geography of Wales adds complexity to the Commission's recommendations. It is welcome that in all recent reviews the Commission have acknowledged that it is no longer advisable to cut valley communities horizontally, now acknowledging where practical that boundaries within valley areas are vertical or follow the natural topography of the valley. This avoids splitting communities.

### In support of the Commission's proposal

The Commission's proposals in relation to the existing Ogmore constituency and Bridgend constituencies are welcome. The name change to Bridgend simply acknowledges the town's size, which again is welcome.

The proposal recognises the long-standing local ties between the two constituencies and ensures the new constituency covers one county area with good transport connectivity, as well as strong economic, cultural and historical ties.

Local Government: Creating the suggested constituency ensures large parts of the Bridgend County Borough Council (BCBC) area remains within one constituency which is welcome. This is due to the fact that residents living in the Llynfi, Garw and Ogmore valleys, along with community of Evanstown in the Gilfach valley as well as the valley gateway areas around Sarn and Aberkefig and the town of Pencoed, access local authority services from BCBC so the suggested new boundary, by helpfully moving much of Bridgend town along with the communities that border the current Ogmore constituency such as Pen Y Fai, Coity and Brackla into one constituency make sense.

Historical: Keeping the Communities of the Llynfi, Garw and Ogmore valleys together acknowledges the long-standing historical connections between the communities, through heavy industry, such as mining for coal or iron. This can equally apply to communities around Sarn and Pencoed, who firstly



worked in pits locally and become larger settlements due to the expansion of industry in the three valleys, so are interconnected due to their shared history. Bridgend town which used to form part of the original Ogmore constituency pre 1983, traces much of its history via the three valleys, so restoring them under one constituency is a logical proposal.

**Economic:** The communities in the existing Ogmore constituency, which are suggested for the new Bridgend constituency, look to Bridgend town centre as a shopping district, including for banking services. The areas of the Garw and Ogmore valleys, along with the communities within the valley gateway such as Sarn, Aberkenfig and Pencoed experience in part high levels of deprivation and the essential service of the Jobcentre Plus is located for all these communities in Bridgend town. The Commission's suggested proposal links formally for residents in the area their long-standing view that Bridgend town is their hub for socio-economic services.

**Transport:** The wards across the Llynfi, Garw and Ogmore valleys, along with all the valley gateway and Pencoed wards, have long standing and well-established transport services to Bridgend. The main bus station is linked for each community in Bridgend and the smaller bus station in Maesteg again has direct connectivity with the Bridgend bus station. All residents in the existing Ogmore constituency use the Bridgend train station for mainline services, reinforcing the long standing connection between the two constituencies. In the case of the Garw and Ogmore valleys, bus services use the Bridgend bus station as a hub for onward travel, with very limited services directly to other destinations.

**Community services:** Health provision, including A&E for the existing BCBC communities of the Ogmore constituency, are in Bridgend. This includes the main hospital provision and wider community health services such as maternity and postnatal services.

The Commission's proposal would logically cement long established ties in terms of sporting, cultural and community connections.

#### Counter Proposals for Bridgend and Aberafan Porthcawl constituencies

Having considered the responses to the initial proposals for Bridgend and the new neighbouring seat of Aberafan Porthcawl, I am aware of concerns

regarding a small number of wards which form part of the town of Bridgend joining Aberafan and Porthcawl and not the new Bridgend constituency.

It is concerning that the alternative proposals put forward by the Conservative Party would include the Llynfi, Garw and Ogmore valleys, as well as breaking up the wards of the gateway area ie Aberkefig being split from the wards of Sarn and Ynysawdre and added to the 13 wards from the existing Aberavon constituency. This would create a split community with difficult to non-existent transport links and it ultimately does not acknowledge the distance of travel for residents when wishing to receive support from their Member of Parliament.

Split Communities: By removing the ward of Aberkenfig you are splitting the communities of Aberkenfig, Tondu and Coytrahen from Sarn, Ynysawdre, Bryncethin and the surrounding villages. These communities share both educational (primary and secondary) and health services. They share recreational services, including a sport centre, cricket ground and local playing facilities. The area is a long and well established community.

Removing the ward would create a further anomaly in the boundaries of the suggested proposal, in that the removal of the Aberkenfig ward would mean the community of Coytrahen is isolated. As an example if the counter proposal was to move forward, residents living in Coytrahen would travel through the new Aberafan constituency twice in order to reach the suggested Bridgend constituency, as the neighbouring wards of Ynysawdre and Sarn would be in the new constituency of Aberafan Maesteg.

It should further be noted that this would mean the communities further up the Llynfi valley, being Llangynwyd, Maesteg and Caerau would not be connected via the main road network, in terms of boundaries, to the suggested counter proposal that includes the Garw and Ogmore valleys, along with the community of Evanstown in the Gilfach valley. Relying instead on single track roads, often only used for agriculture and access to remote farms. Or driving down the Afan valley and then back across the M4 or up the Afan valley to gain access to the Ogmore valley and then Garw valley in order to not leave the suggested constituency.

It cannot be compatible with the Commissions ambitions to have whole communities disconnected as is suggested in the counter proposals.

Lack of transport connectivity: Although there are services that run between the communities in and around Maesteg down the Afan valley, there are little to no services between the Garw and Ogmore valleys, as well as the community of Evanstown. As an example, to get a bus from the Garw valley to Port Talbot is one hour forty minutes, which includes a change in Bridgend. Residents would find it perplexing as to why their Parliamentary constituency links with Aberavon despite having little to no physical or historical connection to the area. Travel time across the suggested counter proposal given the lack of physical road networks connecting the Garw valley with either the Llynfi, Ogmore, Afan valleys and any of the areas around Port Talbot would make travel up to an hour in most cases which seems illogical when considering the Commission's objection of keeping community ties where possible.

Engaging support: Much has been said about the accessibility of politicians before and since the pandemic. It is important that any suggested counter proposals bring together areas with logical connections. If the counter proposal was supported by the Commission, engaging with two distinct communities without connection could prove challenging, especially for further to reach communities like those in the Garw and Ogmore valleys, which have mountain ranges dividing them from the areas in and around Port Talbot and is accessed via Bridgend, which would be in a different constituency.

The counter proposals put forward by the Liberal Democrats suggest the break up of communities with well established ties, including northern valley communities that share for example health and education provision. I set out a series of concerns regarding these proposals below.

Firstly, the Aberavon with Maesteg and South East Swansea counter proposal ignores the established community of Llangynwyd as part of the Llynfi valley. Llangynwyd shares educational, health and cultural links and services with Maesteg. To break these communities up given how interconnected their boundaries are would mean a valley split in two which would go against the principles of the Commission to not divide communities where it can be avoided. Equally spanning a constituency over three county borough areas does not follow the Commission's ambition to keep constituency boundaries to a minimum number of council areas and could potentially leave

communities like Maesteg isolated when considering the challenges of representing a constituency that includes a city.

The suggested counter proposal of Bridgend does not acknowledge the long established links of the community of Bettws with the Garw valley, including the ward forming part of the Garw Valley community council. To split community boundaries like this is unhelpful as it fails to acknowledge the historical ties the communities of Blaengarw, Pontycymmer and Llangeinor have with Bettws. It further ignores the shared GP services in the community, as well as newly constructed Welsh-medium pre and primary school provision for the whole valley now being based in Bettws. Although the Commission are not responsible for the decisions of the local authority, commitments made to keep communities together through improving the education estate for Welsh-medium provision I hope would be considered.

Further, the proposal separates the community of Bryncethin from its community council area, St Brides Minor. This again makes little sense given it's shared sense of community with the wards of Bryncoch, Sarn and Ynysawdre. Equally concerning is that the Bryncethin ward shares primary and secondary education facilities with the above wards as well as GP and wider community health services. Breaking the communities up on the basis of achieving the correct numbers for a different counter proposal does not help in achieving the Commission's ambition of keeping long and well-established communities in tact where possible.

The wards including Felindre, Penprysg and Hendre make up the town of Pencoed, it's education facilities, both secondary and further education are interconnected with Bridgend town and residents of Pencoed rely on Bridgend for socio-economic services including Jobcentre Plus. It has no connection with the communities that make up the Rhondda. I will return to this in my concerns regarding the Rhondda counter proposal.

Finally, on the Bridgend counter proposal the wards of the Ogmore valley are closely connected to the borough of Bridgend, including bus services, ongoing rail connections, health provision, as well as sharing an economic and commercial centre. From banking to food purchases, the communities look to Bridgend; to split the valley off into a community it has little link with will not serve the best interests of residents.

The Cardiff West proposal, adding the wards of Brynna, Llanharan and Llanharan reflect no community connections for these communities at all. They are nowhere near Cardiff and have no historic connection to the city. It is not correct to say that there are large areas of open land between the wards and the rest of the existing Ogmore constituency. The boundaries of the Brynna ward have footpath walk ways to the town of Pencoed; Bridgend College and housing development in the area directly link and advertise commercial and transport services to either Pencoed or Bridgend town centre; education provision is offered between the three wards and Pencoed for English and Welsh-medium primary education, as well as in the secondary sector. The Commission's existing proposal of placing these wards in the expanded Rhondda constituency would acknowledge residents' views that they are part of the RCT council area, not split between Bridgend and RCT. There would be astonishment that they could ever form part of a Cardiff West constituency.

Finally, the Rhondda constituency proposal does not acknowledge the fact that the town of Pencoed and the communities of Bryncethin have no connection to the communities of the Rhondda Fach and Fawr valleys. Pencoed and Bryncethin look to Bridgend for health, education, economic and cultural services. Within the proposed changes the Garw valley communities of Blaengarw, Pontycymmer and Llangeinor move into the new constituency. This is problematic as to gain access to these three wards on the main highway network you would need to exit the proposed constituency, enter the Bridgend constituency, and then head back into the new Rhondda constituency. The only other option is to drive to the top of the existing Rhondda constituency, travel down the Ogmore valley and then use minor B roads to enter the Garw Valley. There are little to no public transport links between the communities in the Rhondda valleys and the Garw valley. Of course all the communities in the Garw and Ogmore valleys again look to Bridgend for health, education and wider socio-economic services which should be considered when creating new constituencies.

The wider and final point of the suggested changes are that they plan to break communities up, often with no connection to their new constituency and in two cases linking them to cities that they have never historically shared boundaries with. It does not take into account the issues of

separating one valley community in two or indeed the historic connections between two valleys, namely the Ogmore and Garw, and wishes to separate the communities in the north of the Llynfi valley in two - none of which seems to meet the Commissions own ambitions.

### Alternative

Given the concerns in the responses from constituents around including wards which form part of the town of Bridgend in the Aberafan Porthcawl proposal, the Commission may of course wish to reconsider its initial proposal by making a minor change.

Given the close community ties these residential areas have with the town of Bridgend, a more minor adjustment would be the ward of Llangewydd and Brynhyfryd and the ward of Cefn Glas becoming part of the proposed Bridgend constituency. Both areas are interconnected, with large housing estates constructed over many years, they are linked via education, health and community services which would make a strong case for both these wards to move into the new Bridgend constituency as suggested by the Commission. Although it is understood the Commission will not consider ward boundaries beyond 1<sup>st</sup> December 2020, it should be noted that Llangewydd, Brynhyfryd and Cefn Glas will form one ward from May 2022, which further supports this small change to respond to the concerns of constituents in the area.

This would leave the Aberafan Porthcawl constituency with 73,554 people, which is at the lower end of the UK Electoral Quota and mean the proposed Bridgend constituency would exceed the UK Electoral Quota with an electorate of 77,626.

To accommodate this, the ward of Cefn Cribwr could move from the proposed Bridgend constituency to the proposed Aberafan Porthcawl constituency, which would leave them with electorates of 76,446 and 74,734 respectively.

Cefn Cribwr has close links with Kenfig Hill and Pyle, which will form part of the new electoral ward following the May 2022 council elections, as well as sharing secondary education and primary health services. Kenfig Hill and Pyle is already proposed to be part of Aberafon Porthcawl constituency.

## Conclusion

The task of the Commission is a difficult one and I would like to thank them for their efforts in undertaking this challenging review and producing a set of proposals that largely ensure community links are kept while meeting the criteria set out by the Act.

I am grateful to the Commission for allowing time to present my statement.

BCW-10219/ [REDACTED] / Cardiff

From: [REDACTED]  
Sent: 30 March 2022 15:10  
To: BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>  
Cc: [REDACTED]  
[REDACTED]

**Subject:** Seniors Group objection to Boundary Commission Proposals

**To the Boundary Commission Wales**

**Conway 50+ Objection to removing Riverside from Cardiff West Constituency.**

The Conway 50+ club is based in Riverside, at the [REDACTED]  
[REDACTED]

The majority of our group members live in Riverside and Canton wards, others are from Fairwater, Llandaff and Radyr wards in Cardiff West. We are a large community group that has been going for nearly eight years and is proving a very important hub for older people in the Riverside community, with more spin off activities from the regular Wednesday morning sessions.

We have 138 members on our contact data base and an average of 45 people attend the weekly Wednesday session.

At our regular 50+ meeting this morning, attended by 46 senior citizens we overwhelmingly wish to object to Riverside ward being put into Cardiff Central. Riverside is on the west bank of the River Taff and so is geographically part of Cardiff West. The three river corridors are a very important feature of Cardiff and clearly divide communities.

The River Taff is not only a physical geographical feature, but the river forms a boundary between communities. Our school catchment areas are all focussed on Cardiff West. Young people from Welsh speaking families attend Ysgol Plasmawr in Fairwater, Cardiff West. The three primary schools in Riverside: Kitchener, Severn and St Mary's RC primary feed into high schools in Cardiff West. Kitchener and Severn to Fitzalan or Cantonian, and St Mary's Primary to Mary Immaculate in Caerau.

As well as schools being linked to Cardiff West - the Riverside communities relate to the shopping area which is in the ward. The local shopping area is often referred to as 'Canton High Street' but the shops on Cowbridge Road East from St Davids Hospital to the former Corporation pub on the corner of Llandaff Road are in fact all in the ward of Riverside.

In addition we feel Pentyrch and Radyr are part and parcel of Cardiff West and should be kept in this constituency. North West Cardiff must remain in Cardiff West. I urge you to oppose the proposed ward boundary changes and add our voice to yours.

Yours faithfully,

[REDACTED] on behalf of Conway 50+ group  
[REDACTED]



**BCW-10220/ [REDACTED] Political Groups in Monmouthshire County Council/ Monmouthshire**

**From:** [REDACTED]  
**Sent:** 30 March 2022 16:02  
**To:** BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>  
**Subject:** Monmouthshire Parliamentary Boundary Review Response

Good afternoon

Please find attached letter, the Leaders of the political groups in Monmouthshire who wish to reiterate their previous position supporting the draft proposals for a single Monmouthshire constituency.

Kind Regards



[REDACTED]

[REDACTED]

*PA to the Chairman and Leader  
Monmouthshire County Council*

Boundary Commission for Wales  
Ground Floor  
Hastings House  
Fitzalan Court  
Cardiff  
CF24 0BL



The person dealing with  
This matter is:  
Telephone:   
E-mail: 

Dear Sir / Madam

### **Parliamentary Boundary Review 2023 – Monmouthshire Proposals**

Following our letter dated 2<sup>nd</sup> November we write again as political group leaders of Monmouthshire County Council to reiterate our previous position in support of the proposals of the Boundary Commission for Wales to make the constituency of Monmouthshire co-terminus with the local authority.

The proposals are sensible, convenient and an improvement on the current position. They will help the public to understand who represents them and encourage greater participation in democracy.

We all oppose any proposals which split Monmouthshire between two or three different constituencies.

Yours Sincerely

**Richard John**

Leader of the Conservative Group

**Dimitri Batrouni**

Leader of the Labour Group

**Simon Howarth**

Leader of the Independent group

**Jo Watkins**

Leader of the Liberal Democrats group

BCW-10221/ [REDACTED] / Cardiff

Hi

Please find attached my response to the current Secondary Consultation. I did submit it earlier via the comments on the website but not received anything to say its been received hence this email. I would be grateful if you could acknowledge its receipt.

Regards

[REDACTED]

This submission will comment on the Commission's initial proposals, the counterproposals, and their compliance with the statutory factors in section 3.4 of the Commission's Guide to the 2023 Review.

Rule 5 in Schedule 2 of the Act specifies that the following factors may be considered as the Commission develops proposals

- special geographical considerations, including, in particular, the size, shape and accessibility of a constituency
- local government boundaries that existed or were prospective on 1 December 2020
- boundaries of existing constituencies
- any 'local ties' that would be broken by changes in constituencies
- the inconveniences attendant on such changes.

This Boundary Review and its proposals are limited by the requirement to meet the Electoral Quota (EQ) framework and the number of electors on the register as December 2020. My submission is therefore restrained by that.

### **Initial Proposals**

I welcome the Commission's initial proposals for the constituency of Cardiff Central as a resident. Equally I welcome the proposals that have been made for Cardiff North, Cardiff West and Cardiff South and Penarth.

The typically large electorates of wards in Cardiff do reduce the number of options available to the Commission. Given that the Cardiff Central constituency is under-sized and the Cardiff South and Penarth constituency is over-sized, the logical extension of the current Cardiff Central constituency with the addition of the Rumney and Llanrumney wards is sensible and is therefore welcomed.

I would add that the Commission is right to recognise areas with existing community links already within Cardiff Central:

### **Cathays and Plasnewydd**

Cathays and Plasnewydd have many community ties. They are overwhelmingly the two primary wards where the very substantial student population from Cardiff University, Cardiff Metropolitan University and the Cardiff campus of the University of South Wales lives. The secondary school catchment area for Cathays High School includes parts of Plasnewydd.

The community connections across Cathays, Plasnewydd and indeed Penylan and parts of Cyncoed are such that residents in all three electoral wards consider themselves part of the Roath community around the shopping districts of Crwys Rd, Albany Rd and City Rd. These community links, including the public transport links out of the City centre, are long-standing and are correctly respected by the Commission's initial proposals.

The children at primary schools in Cathays and Plasnewydd attend Cathays High School, Bro Edern (situated in Penylan) or Cardiff High School (situated in Cyncoed).

### Plasnewydd /Roath and Penylan

Many residents of Penylan and Plasnewydd consider themselves to be part of the Roath community and the place name “Roath” is very well established and understood. It is seen on school names, Roath Park Primary School, and on our landmark geographical features such as Roath Recreation Ground, “The Rec.” which is in the Plasnewydd ward.

The electors of Penylan look towards the shopping district of Albany Road and Wellfield Road in Plasnewydd. The children at primary schools in Penylan attend Cathays High School travelling along Albany Road and Crwys Road main thoroughfares on their journeys to school.

### Penylan and Cyncoed

Many residents of Penylan and parts of Cyncoed consider themselves to be part of the Roath community and the place name “Roath” is very well established and understood. It is seen on our landmark geographical features such as Roath Park and Roath Park Lake, both geographically being within the Cyncoed ward. Residents of both wards look to Albany Road and Wellfield Road particularly for their shopping and other amenities.

### Rumney and Llanrumney

The Commission’s proposed inclusion of Rumney and Llanrumney within Cardiff Central builds on both wards already having very good and well-established transport links, both road and public transport, to the existing Cardiff Central constituency. Newport Road is the main road from Llanrumney, through Rumney, through both Penylan and Adamsdown and into Cathays. Rumney and Llanrumney are wards with deep and extensive local ties to each other. The school catchment areas for Llanrumney and Rumney are inter-linked at Eastern High school. The main recreation area, is the Rumney Recreation Ground, situated in Llanrumney.

### **Counter- Proposals**

Several counterproposals relating to Cardiff Central and the adjoining three Cardiff constituencies have been made. Having read these I suggest that they do not represent better solutions and I outline below, the areas within each proposal that fail to meet the factors outlined in Rule 5, Schedule 2 of the Act.

### **Conservative Party Counter Proposal**

This suggests, without any apparent compelling reasoning, removing Riverside ward, which is situated on the west of the River Taff, from the Cardiff West constituency and adding it to the Cardiff Central constituency.

It is difficult to discern any logic in these proposals in comparison with the Commission’s initial proposal, which meets rule 5 criteria in terms of existing constituencies and geographical considerations by retaining the whole of the current Cardiff West seat located on the west of the River Taff.

Riverside ward is in fact very different in character to the city centre (Cathays ward), all of which is on the east of the Taff. The city centre consists mainly of commercial properties (shops, restaurants, bars, offices, the stadium, the castle, the railway station etc) with some city centre apartments.

Riverside ward is mainly residential and despite its name extends a long way from the immediate vicinity of the river. South Riverside is one of Wales's most diverse areas, with very close local ties to neighbouring Canton with the district shopping area of Cowbridge Road East (which is also the main bus route) forming a spine linking the 2 wards.

Most local people go to shop along Cowbridge Road rather than the city centre. In fact the Riverside ward covers large parts of the area which most local residents would regard as Canton, ending as it does at Leckwith and Llandaff Roads. Where Canton and Riverside wards meet near the historic crossroads on Cowbridge Road East is the place local residents regard as the heart of the Canton community.

The Pontcanna part adds to Riverside ward's unique diversity by being the home to a large number Welsh speakers as increasingly is neighbouring Canton. Children from Riverside ward overwhelmingly attend schools in the west of the city. At secondary level predominantly they attend Fitzalan High School (Canton Ward), the Welsh medium Ysgol Gyfun Plasmawr (Fairwater), and Church in Wales Bishop of Llandaff Church in Wales School (Llandaff).

In practice there are very few community links across the river, as the residential areas of Riverside and the Cardiff Central residential areas are separated, not only by the very significant geographical presence of the River Taff, but by the commercial city centre, the civic centre, and large swathes of park land.

This counter proposal also involves moving the Rumney and Llanrumney wards into two different constituencies. This again ignores the significant local ties between the wards. The school catchment areas for Llanrumney and Rumney are inter-linked at Eastern High school.

This proposal moves Llanrumney into a revised Cardiff North constituency. There are no particularly strong links between Llanrumney and Pontprennau & Old St Mellons. Indeed, the transport links are extremely limited between Llanrumney and Cardiff North. In practice there are no particularly strong community links at all between these two wards, and the proposal to move the wards of Llanrumney and Rumney into different constituencies is completely contrary to Rule 5 and respecting local ties.

This counter-proposal also involves a total of three electoral wards within Cardiff moving from their current constituencies; compared to the two wards affected by the Commission's Initial Proposals.

### **Liberal Democrat Counter Proposal**

The Liberal Democrats' counter proposal involves moving a significantly higher number of wards between existing constituencies in Cardiff. This counter-proposal, which returns Rumney and Llanrumney to Cardiff South and adds Gabalfa and the Heath to Cardiff Central again fails to take into account the strong local ties that exist.

The Gabalfa ward is very closely linked into the Llandaff North ward. Indeed, the Gabalfa Estate, one of the oldest housing estates in Wales, straddles these two wards. The Gabalfa roundabout brings together the communities of Whitchurch and Gabalfa. Residents in both Gabalfa and Llandaff North look towards the shopping district of Merthyr Road in Whitchurch.

The Heath ward borders the Llanishen ward. The two communities are closely tied, not just by transport links, but by school catchment areas, services and amenities. Given the close proximity of schools such as Ton Yr Ywen in Heath, many children living close by in Llanishen attend. The two wards have good transport links, with a train line running through. Both wards share access to amenities such as Llanishen Lesiure Centre, Cardiff Lifestyle Park, Sports Clubs, Community Centres, green spaces and much more.

### **Summary**

Rule 5 in Schedule 2 of the Act specifies a number of factors that the Commission may take into account.

### **Boundaries of existing constituencies**

The initial proposals from the Commission move two wards from existing constituencies.

The counter proposals from the Conservatives move three.

The counter proposals from the Liberal Democrats move five wards within Cardiff into a different constituency.

Neither of these proposals are a better solution than the Commission's initial proposals. In fact, both are a worse solution.

### **Any 'local ties' that would be broken by changes in constituencies**

As is outlined above, the 'local ties' impacted by the Conservative counter-proposal are significant in regards to the impact of their proposals on Riverside, Llandaff North and Llanrumney.

The 'local ties' impacted by the Liberal Democrats' proposal are significant in relation to Gabalfa, Heath, Llanrumney, Radyr and Pentyrch.

Neither of these proposals are a better solution than the Commission's initial proposals. In fact, both are a worse solution with the Liberal Democrats' solution being significantly worse for the reasons set out above.

### **Conclusion**

I accept that there are some concerns about the links between Trowbridge and Splott in the initial set of proposals. However, as set out above, the various counterproposals all have greater failings in adhering to the statutory factors contained in Rule 5, Schedule 2.

I therefore submit that the Commission should reject the counter proposals.

The Commission's proposals for the four parliamentary constituencies in Cardiff meet both the electoral quota as defined by the Act but are also the least disruptive proposals based both on the statutory factors and special geographical considerations within the Act.

**BCW-10222/** [REDACTED] **/ Cardiff**

**From:** [REDACTED]

**Sent:** March 2022 17:22

**To:** BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>

**Subject:** Comment on proposal to move Riverside ward from Cardiff West Constituency/.

### **Reasons to oppose the removal of Riverside Ward from Cardiff West Constituency**

Cardiff is a city, split into two halves, the east side and the west side. We are split by geography- Afon Taf and Bute Park make east-west travel difficult. The public transport system reflects this barrier. West side buses travel to the centre and no further. The same is true of east side buses. The few cross city buses (1,2 and C3) are little known and little patronised.

Citizens of Riverside Ward shop locally (Cowbridge Road, Western Avenue, Culverhouse Cross, Leckwith), with occasional forays into town. The same is true of the east side. We never shop and rarely visit centres in the east. We look to Chapter, for film and art and classes. The east side looks to Roath. The change to Cardiff Central will therefore kill the interest of Pontcanna residents in local politics - there will be limited attendance at social and political events. We go to meetings in Transport House, we do not cross city boundaries to do so.

Historically, Riverside Ward, including Pontcanna, was part of Canton and looked to St John's church. In fact, in the eighteenth century Canton was considered a diocese and a village in its own right.

Riverside wishes therefore to maintain its historical connection with Cardiff West. Riverside Ward is part of the strength of Cardiff West. It has three Labour Councillors and is in a constituency with a Labour MP and a Labour MS, First Minister Mark Drakeford. Local inhabitants will regard the proposal to move it into Cardiff Central as an attempt to Gerrymander Cardiff West. It will be seen as a direct attempt to weaken the First Minister. Whatever the truth of that matter - this is hardly the perception that the Boundary Commission should wish to create.

[REDACTED]



**BCW-10223/ Dr James Davies MP/ Vale of Clwyd**

**From:** [REDACTED]

**Sent:** 30 March 2022 18:07

**To:** BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>

**Cc:** [REDACTED]

**Subject:** BCW submission

Dear Sir/Madam,

Please find attached a letter from Dr James Davies MP.

Best wishes,

[REDACTED]



[REDACTED]



Boundary Commission for Wales  
Hastings House  
Fitzalan Court  
Cardiff  
CF24 0BL

By email to: [bcw@boundaries.wales](mailto:bcw@boundaries.wales)

30 March 2022

Dear Sir/Madam,

**Support for UK Community Renewal Fund application**

I am writing further to my letter of 2<sup>nd</sup> November 2021 and to my presentation to the Commission at the Wrexham Public Hearing on Wednesday, 23<sup>rd</sup> February. Before the closure of the second consultation period, I believe it would be of use to highlight some key points arising from responses to the initial consultation period, which I raised at the hearing.

I think it is evident that there is considerable support within the consultation responses for the counter proposals which the Conservative Party, myself and other stakeholders have set out for my part of North Wales. In addition, both Plaid Cymru and the Green Party have agreed, in so far that they have suggested it would be inappropriate to unite coastal and industrial areas such as Prestatyn and Flint.

There is significant opposition in the Ruthin area, including from Ruthin Town Council, regarding plans to include this historic market town within the proposed "Delyn" seat. The Labour Party have also expressed a view that Ruthin fits poorly into the new "Delyn". These observations align with Conservative counter proposals which would see – within any such new seat – Ruthin joined by more of its hinterland (i.e. areas complementary to it), and Dee Estuary areas removed. It is worth noting also that the Liberal Democrats have also suggested adding various areas of south Denbighshire into the proposed "Delyn" seat.

Elsewhere, there have been suggestions for a Denbighshire County seat.

**Constituency Office:**





**Dr James Davies MP**  
Member of Parliament for Vale of Clwyd/ Dyffryn Clwyd



Finally, a number of other voices have expressed their disagreement with the proposed constituency name "Delyn", and I set out similar opinions in my letter of 2<sup>nd</sup> November.

Very many thanks for your consideration of the above.

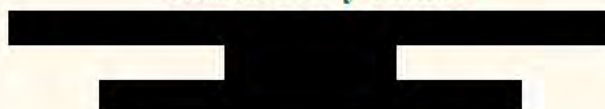
Kind regards.

Yours faithfully,



**Dr James Davies MA MB BChir (Cantab)**  
Member of Parliament for the Vale of Clwyd

**Constituency Office:**



**BCW-10224/ Cllr Jane Pratt/ Monmouthshire**

**From:** [REDACTED]  
**Sent:** 30 March 2022 20:14  
**To:** BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>  
**Subject:** Boundaries Consultation

Dear Sir or Madam,

I am a Councillor for Llanelly Hill Ward in Monmouthshire and the Cabinet member for Infrastructure and Neighbourhood Services.

I was very pleased that the Boundary Commission proposed that Monmouthshire was a coterminous constituency with the same boundaries as the local authority.

This would be very convenient and makes for good governance and is also an improvement on the current position where Monmouthshire is split between two constituencies and the Monmouth constituency contains parts of two local authorities.

I understand that some proposals have been made which would split the Monmouthshire Authority between two or three constituencies and that the Monmouth constituency would contain parts of two or three local authorities. I would ask you to totally reject these alternatives and stick with your original proposals for the Monmouthshire constituency coterminous with the local authority.

Yours faithfully,

[REDACTED]

County Councillor Jane Pratt  
Cabinet Member for Infrastructure & Neighbourhood Services  
Ward Member for Llanelly Hill  
Monmouthshire County Council

**BCW-10225/ Cllr Will Thomas/ Swansea**

**From:** [REDACTED]

**Sent:** 30 March 2022 21:08

**To:** BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>

**Subject:** Gower & Swansea West

Hello,

I would like to lodge my support for the Boundary Commission proposals for the new Swansea West and Gower Constituency.

I am County Councillor of Newton and also represent the Newton ward on Mumbles Community Council. Mayals is very much part of the Mumbles area and that is obviously why it is part of the community council area. We have long felt it odd that it is a different parliamentary boundary but glad that it will hopefully be joined in future and bring the community together.

I would also suggest that the constituency be called 'Gower & Swansea West' as that is what the proposed area is and will be easy for people to relate to as many people will not look at the new map.

Kind Regards

Cllr Will Thomas

BCW-10226/ [REDACTED] / Cardiff

**From:** [REDACTED]  
**Sent:** 30 March 2022 21:17  
**To:** BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>  
**Subject:** Boundaries proposal for Cardiff North

30 March 2022

Dear Commission,

I am writing as a local resident and first voter for Llandaff North . This submission relates to the Commission's Initial Proposals for Cardiff North and I will briefly reference the three other adjoining seats in Cardiff – Cardiff Central, Cardiff West and Cardiff South and Penarth. This submission also addresses the counter-proposals put forward during the consultation period relating to Cardiff North.

I welcome the Initial Proposals for the constituency of Cardiff North which would see the constituency remain largely intact, with the addition of Taff's Well. I also welcome the Initial Proposals made for Cardiff West, Cardiff Central and Cardiff South and Penarth which, as a whole, would entail just two wards within Cardiff moving constituency. Appreciating that Cardiff Central is under-sized and Cardiff South and Penarth is over-sized, the proposal to add Rumney and Llanrumney wards to Cardiff Central is sensible and welcome.

The proposal to keep Cardiff North whole with the addition of Taff's Well acknowledges the geographical links with the natural boundary of the Taff River and given good transport links between Taff's Well and the north of Cardiff, Taff's Well would seem a natural addition to the constituency.

The counter-proposal put forward by the Conservative Party does not recognise or respect the existing and longstanding community links in Cardiff North. Llandaff North and Whitchurch feel very connected as communities. The two wards share amenities, schools, green spaces and public transport links. Llandaff North looks to Whitchurch as its main shopping district.

The natural boundary of the Taff River separates Llandaff North from Llandaff in Cardiff West which has few transport links and no sense of connection to each other. The two communities on opposite sides of the river have little in common other than in name and so the proposal to move Llandaff North to Cardiff West is neither sensible nor does it recognise the existing local ties. Moving Llandaff North to Cardiff West would also halve one of the oldest housing estates in Wales. Mynachdy is partly in Gabalfa. Gabalfa, Llandaff North and Whitchurch are all linked and accessed via the Gabalfa roundabout.

There is also no natural connection between Cardiff North and Trowbridge. This counter-proposal ignores the significant local ties between the wards of Llandaff North, Gabalfa and Whitchurch and the subsequent limited transport links between Trowbridge and north Cardiff. This proposal ignores the local ties that must be recognised under Rule 5 Schedule 2 of the Act.

The counter-proposal that would see Gabalfa and the Heath move to Cardiff Central also fails to take into consideration the strong local ties that exist in these wards. As neighbouring wards, the Heath is closely tied to Llanishen in transport, school catchment areas, leisure centres, the Cardiff Lifestyle Park, sports clubs, community centres, green spaces and much more, but Llanishen would stay within Cardiff North, creating an illogical and unnatural separation.

In conclusion, I support the Boundary Commission's Initial Proposals and reject the counter proposals as set out above. The Boundary Commission's proposals are respectful of local ties and are the least disruptive in nature, only proposing to move two wards in Cardiff instead of three or five as set out in the counter-proposals.

Thank you for giving this your consideration.

Your sincerely,

A solid black rectangular box used to redact the signature of the sender.

BCW-10227/ [REDACTED] / Cardiff

**From:** [REDACTED]

**Sent:** 30 March 2022 21:27

**To:** BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>

**Subject:** Boundary change proposal for Cardiff North

30th March 2022

Dear Commission,

I am writing as a local resident for Llandaff North. This submission relates to the Commission's Initial Proposals for Cardiff North and I will briefly reference the three other adjoining seats in Cardiff – Cardiff Central, Cardiff West and Cardiff South and Penarth. This submission also addresses the counter-proposals put forward during the consultation period relating to Cardiff North.

I welcome the Initial Proposals for the constituency of Cardiff North which would see the constituency remain largely intact, with the addition of Taff's Well. I also welcome the Initial Proposals made for Cardiff West, Cardiff Central and Cardiff South and Penarth which, as a whole, would entail just two wards within Cardiff moving constituency. Appreciating that Cardiff Central is under-sized and Cardiff South and Penarth is over-sized, the proposal to add Rumney and Llanrumney wards to Cardiff Central is sensible and welcome.

The proposal to keep Cardiff North whole with the addition of Taff's Well acknowledges the geographical links with the natural boundary of the Taff River and given good transport links between Taff's Well and the north of Cardiff, Taff's Well would seem a natural addition to the constituency.

The counter-proposal put forward by the Conservative Party does not recognise or respect the existing and longstanding community links in Cardiff North. Llandaff North and Whitchurch feel very connected as communities. The two wards share amenities, schools, green spaces and public transport links. Llandaff North looks to Whitchurch as its main shopping district.

The natural boundary of the Taff River separates Llandaff North from Llandaff in Cardiff West which has few transport links and no sense of connection to each other. The two communities on opposite sides of the river have little in common other than in name and so the proposal to move Llandaff North to Cardiff West is neither sensible nor does it recognise the existing local ties. Moving Llandaff North to Cardiff West would also halve one of the oldest housing estates in Wales. Mynachdy is partly in Gabalfa. Gabalfa, Llandaff North and Whitchurch are all linked and accessed via the Gabalfa roundabout.

There is also no natural connection between Cardiff North and Trowbridge. This counter-proposal ignores the significant local ties between the wards of Llandaff



North, Gabalfa and Whitchurch and the subsequent limited transport links between Trowbridge and north Cardiff. This proposal ignores the local ties that must be recognised under Rule 5 Schedule 2 of the Act.

The counter-proposal that would see Gabalfa and the Heath move to Cardiff Central also fails to take into consideration the strong local ties that exist in these wards. As neighbouring wards, the Heath is closely tied to Llanishen in transport, school catchment areas, leisure centres, the Cardiff Lifestyle Park, sports clubs, community centres, green spaces and much more, but Llanishen would stay within Cardiff North, creating an illogical and unnatural separation.

In conclusion, I support the Boundary Commission's Initial Proposals and reject the counter proposals as set out above. The Boundary Commission's proposals are respectful of local ties and are the least disruptive in nature, only proposing to move two wards in Cardiff instead of three or five as set out in the counter-proposals.

Thank you for giving this your consideration.

Your sincerely,

[Redacted Signature]

Local Resident for Llandaff North

[Redacted Address]

## BCW-10228/ Beth Winter MP/ Cynon Valley

**From:** [REDACTED]  
**Sent:** 30 March 2022 21:48  
**To:** BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>  
**Subject:** Boundary Commission consultation response

Hello,

Please find attached feedback regarding the Boundary Commission proposals for Cynon Valley.

Kind Regards,

Beth Winter

### Response to Boundary Commission Proposals

The points below are points that have been raised with me by local constituents:

1. General Wales

- reduction in numbers of MPs across Wales reduces the democratic voice and influence of Wales in Parliament.
- The new boundaries are based on population size and not on need.

2. Specific Cynon Valley

- Cynon Valley is geographically a unit with mountains on either side. Splitting the valley between Pontypridd and Merthyr Tydfil will undermine the historical, cultural and social ties running through the valley.
- There are also transport links which run clearly along the valley, rail and roads North to South. Transport connections with Merthyr Tydfil do not have this pattern of accessibility.
- The proposal will result in half of the constituency being placed outside its Local Authority of RCT, adding to the complexity of relationships between councillors, the MS and the MP.
- The proposal will create difficulties for constituents in Cynon Valley in terms of accessing their MP. Cynon Valley has a higher than average rate of elderly and disabled people and high levels of deprivation.
- One alternative proposal from members is that part of Pontypridd constituency is merged with Cynon Valley. This would retain the geographical pattern of the valleys and would retain the linkage with the current Local Authority boundaries.
- On a micro level there are definite concerns around where the line is drawn within the Cynon Valley if the line must be drawn within the Cynon Valley. A specific concern relates to the Aberaman ward which will be split under the current proposals. Splitting this ward is unnecessary and will create significant issues for local people and the three local Councillors representing the entire ward. I would therefore urge the

Commission to urgently amend this so that the Aberaman ward remains intact.

**BCW-10229/ [REDACTED] Cardiff West Labour Constituency Party/  
Cardiff**

**From:** [REDACTED]  
**Sent:** 30 March 2022 22:05  
**To:** BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>  
**Subject:** RE: Cardiff West Constituency Labour Party Response to the Secondary Consultation Period

Dear Boundary Commission for Wales,

Cardiff West Constituency Labour Party, being the representative for Labour members within the Cardiff West Constituency has noted the proposals from the Liberal Democrats and the Conservative Party in respect to the Cardiff West Constituency. We oppose both their content and rationale for the reasons below.

Of the Conservative Party's proposal, we note that for Cardiff West they wish to add the ward of Llandaff North and remove the ward of Riverside from the Constituency.

We strongly oppose their proposal to add Llandaff North to the Constituency - the river forms a clear geographic and historic boundary and there are no strong links between the two wards of Llandaff North and Llandaff outside of the name. To state as such, as the Conservatives do in their submission, shows an ignorance of the area.

We similarly oppose the proposal in that submission to the remove Riverside from Cardiff West. The Riverside community has a clear geographic and community cohesion with both the Canton ward and with the Llandaff ward. To remove it would divide the local community and, in so doing, damage irrevocably communal ties and familiarity with their elected representatives.

Overall the Conservative Party's proposals appear to be based on what could advantage them in electoral terms rather than any of the stated aims of the Boundary Commission.

The Liberal Democrat's proposals to add the Llanharry and Llanharan wards and remove the Radyr and Pentyrch ward are similarly illogical.

While we accept that the Commission can only take into account current population numbers, it is likely that after the completion of the new Plasdwr estate, Cardiff West will be above the targeted population for representation set by the Boundary Commission. To propose adding additional communities, further out than the proposed addition of Pontyclun, would not make sense and, combined with the retention of Radyr and Pentyrch, would exceed the targeted number for representation. Radyr and Pentyrch have deep historical and communal ties to Cardiff West and the River Taff provides a clear geographic border, and we strongly support their retention.

Regards,

[REDACTED]

Secretary of Cardiff West CLP

**BCW-10230/ [REDACTED] Carmarthen East & Conservative Association/  
Llanwrda**

**From:** [REDACTED]

**Sent:** 30 March 2022 22:17

**To:** BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>

**Subject:** Comment on the 2023 Review from Carmarthen East & Dinefwr  
Conservatives

I would like to formally respond on behalf of the Carmarthen East & Conservative Association to the Commission's 2023 proposals and some of the counter proposals which have been made.

**Support for the 2023 proposals as they stand with some minor changes**

We strongly support the 2023 proposals as they very accurately represent community connections in Carmarthenshire and do an excellent job of matching the commission's numerical requirements with the facts on the ground in terms of local geography, traditional county boundaries and community connections. The overwhelming reaction to the initial proposals to Caerfyrddin and Llanelli seats has been positive as can be seen from the comments from the public and local councils in Carmarthenshire including the County and several Community Councils.

There are some suggestions for slight tweaks which would result in an improvement. We support the recommendation of Plaid/Independent Carmarthenshire County Council and Llangunnor Community Council that Llangunnor Ward be moved into Carmarthen as it forms the southern part of Carmarthen Town. This ward is relatively small in population at 2,194 so therefore does not affect the figures greatly. Its population firmly believe that they live in Carmarthen town and the ward contains both Carmarthen's Bro Myrddin Welsh Comprehensive, Carmarthen's railway station, its post office and its police station.

There is also an interesting proposal from Independent controlled Llanelli Town Council to undertake a further swap between the wards of Saron and Penygroes with the Llangyndeyrn Ward as Llangyndeyrn has closer connections with Carmarthen than those of Llanelli and Saron and Penygroes are more similar in character and in development to Llanelli. We think this proposal too also has merit, especially as it is a relatively simple swap of numerically similar areas – especially as it will better reflect community connections.

**Damaging proposals which would harm community ties**

However, there are some less than helpful suggestions which would break historical, geographic and community connections.

Particularly, detrimental to community connections is the proposal by Ceredigion Council to cross the Teifi - one of the most significant natural boundaries in West Wales with a cross-borough seat.

While it might look convincing on a spreadsheet, this proposal is opposed by all the political parties and rides roughshod over historic community connections and the

historic county boundaries. There are long-standing differences between the communities in Ceredigion and Carmarthenshire as amply demonstrated by the hostility to the Dyfed County and the reversion to the historic counties in West Wales. Ceredigion and Carmarthenshire both have distinct identities and a proud heritage to some extent even bordering on sense of rivalry between communities on either side of the Teifi river. They have never been historically linked in this way, unlike Carmarthen and Pembrokeshire or Ceredigion and Pembrokeshire have over the years. This proposal would be a significant departure from historic precedent and would have some extremely odd effects.

To give but one example, it would split Cynwyl Gaeo out of Carmarthenshire's new Cilycwm Ward. This ward has been established because of the close community connections in this part of rural north Carmarthenshire. Not only would the Ceredigion Council proposal split a ward but it would result in two parts of this rural community having different MPs. Furthermore, the historic Dolaucothi Gold Mines, one of Carmarthenshire's prime tourist attractions, would be in this Ceredigion constituency and not in the Carmarthen seat containing the County Museum which holds some of its artefacts.

Residents in these wards have few community links or connections with Ceredigion due to the way the river and road networks run. Firstly, considering shopping and retail. The roads of North Carmarthenshire fan down towards Carmarthen Town. The community connections of residents in Cenarth, Llangeller, Llanybydder, Cynwyl Gaeo and Llanfihangel-ar-Arth are overwhelmingly with the nearby Carmarthenshire towns to the south and in most cases Carmarthen town itself. This is particularly the case as shopping amenities in rural Carmarthenshire and in border towns like Llandysul have declined markedly in recent decades, whilst Carmarthen has become a major retail shopping destination with a concentration of shopping and other amenities frequented by these communities.

Secondly, another instructive example of these community links is the healthcare system in Carmarthenshire. The key General Hospital for the population of these wards is Glangwili in Carmarthen. This is due to the geography of the Teifi valley. Residents from these wards do not access healthcare at Bronglais in Aberystwyth because the Teifi is a geographic obstacle. Their hospital, for A&E, together with the majority of health services, is at Carmarthen because this is the way the road network is configured. Consequently, on the basis of health care too, inclusion of these wards in the new Carmarthen seat is the most logical outcome reflecting community connections with the General Hospital at Glangwili.

It is no wonder therefore that the original proposals as published by the commission for a new Carmarthen seat more accurately reflect the genuine connections of these wards with their neighbouring Carmarthenshire wards as they take account of local geography including the major river network and roads. This is why the Commission's initial proposals have such strong local support, as can be seen in the community response.

The harm that Ceredigion Council's proposals purport to fix is that it has been argued that the new Ceredigion constituency will be too long in length. However, the A487 coast road – one of the best pieces of transport infrastructure in west Wales -

provides an excellent transport backbone from one end of this Commission's Preseli Ceredigion seat to the other. A far better transport link than any link that exists between Ceredigion and the wards of north Carmarthenshire, which are in many cases nothing more than B roads. Moreover, there is a historical precedent for Ceredigion being joined with Preseli Pembrokeshire and furthermore a precedent for serving constituents in this seat through having multiple MP offices.

Consequently, the Ceredigion proposal will do far more harm than good to community links and create an ever more complex mix of local government, Welsh Parliament and Westminster Parliament representation.

### **Proposals which make no logical geographic sense**

Finally, turning to the highly controversial proposals from Plaid Cymru to place the western Carmarthenshire Wards of St Clears, Laugharne Township and Llansteffan into the Llanelli division. These changes are geographically nonsensical as some of these wards are separated by one of the largest river estuaries in Great Britain. Moreover, they are strongly opposed locally as it would pair up such radically different communities. There are no common community links whatever between Llanelli with its base of heavy industry and the tourist and agricultural towns of west Carmarthenshire. They could not be more different. They share no common services, residents access healthcare in different places and even the shopping and retail services are entirely different.

Their inclusion in a Llanelli dominated seat is extremely problematical and it seems to be based on nothing more than a need to make the numbers work.

### **Conclusion**

The oddities created by some of the suggested amendments to the 2023 proposals demonstrate the robustness of the original work of the Commission. It is our considered judgement, having read through the public responses in some detail that these not only, represent the best solution to the task the Commission faces, but are a substantial improvement on even the existing boundaries which have been in place a number of years. While very minor changes to these proposals such as the move of Llangunnor would clearly command popular support from local communities of all political persuasions, major changes would be very detrimental to community and historic connections.

We would therefore support the Commission's Initial Recommendations with the addition of the Llangunnor ward into the new Caerfyrddin / Carmarthen seat.

Kind Regards,



Chairman / Cadeirydd

Carmarthen East & Dinefwr Conservatives / Ceidwadwyr Dwyrain Gaerfyrddin a Dinefwr



**BCW-10231/ Welsh Liberal Democrats/ Cardiff**

**From:** [REDACTED]  
**Sent:** 30 March 2022 22:41  
**To:** BCW <[bcw@boundaries.wales](mailto:bcw@boundaries.wales)>  
**Subject:** Welsh Lib Dems submission - Second consultation round

Please find attached the Welsh Lib Dem Submission for the second round of consultation

[REDACTED]

*2021 review of the  
boundaries for  
Westminster  
Constituencies  
Second Consultation  
response*

Welsh Liberal  
Democrats  
Democratiaid  
Rhyddfrydol Cymru



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## **Introduction**

Following the publication of the set of responses to the initial consultation and presentations at the various hearing across Wales the Welsh Liberal Democrats have taken time to review our proposals in light of the representations received.

Whilst it will not be possible to meet the desires of every respondent We are pleased to see that many of the issues we identified and addressed in our response to the Commissions proposals are concerns that are shared by many Welsh voters of course some are not and our own proposals are likely to have individuals that have problem what we have suggested.

We are however not set in stone in our response and accordingly the first part of this second response highlights three sets of alternatives to our original plans and highlights where our proposals could address the concerns of others.

We also not a number of suggestions being made about names. Whilst this is important at this point with the actual boundaries likely to be different to originally proposed we would expect this to have more consideration in the final consultation phases. We therefore have refrained from looking at names beyond consideration of what should be the consultative start point for our own proposals.

This document therefore represents an amendment to the original submission of the Welsh Liberal Democrats in a number of areas to reflect comments by other organisations and members of the public.

.

## **Revisions to Original Proposals by the Welsh Liberal Democrats**

*Whilst our proposals are largely unaltered from our initial submissions we do offer two specific changes to our proposals in the Carmarthen and Bridgend/Aberavon areas. These are as a direct response to representations made by others and are a formal change to our submission.*

*We have also spent additional time looking at the challenge that is the Cardiff area and how best to address the detached Trowbridge problem. In this instance we have identified an alternative arrangement which can be constrained within the boundaries of five constituencies. We had considered this previously but rejected it for our initial proposal as the linkage of one ward is reliant on pedestrian/cyclist access not motor vehicle.*

*We do however feel it appropriate, if unusual, to offer it to the Commissioners to consider as a drop in alternative to our wider counter proposal if they are content with the linkage outlined.*

## Changes to proposals in the Bridgend and Aberavon area

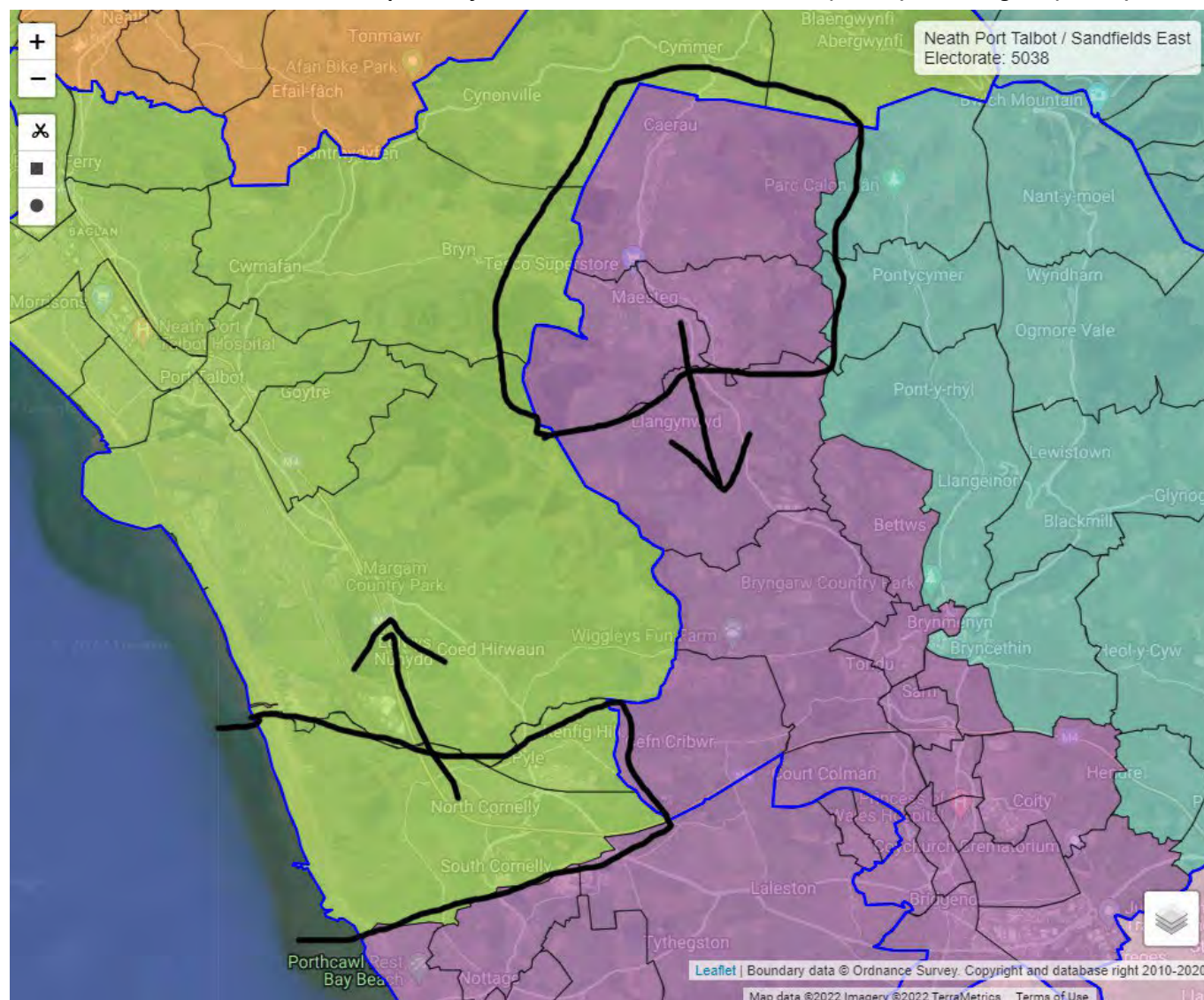
*The proposals set out in the First consultation response by the Welsh Liberal Democrats focussed on maintaining the geographic integrity of historic constituencies as a material consideration underpinning all our plans. In this area we focussed on maintaining Bridgend constituency as a priority. In order to achieve this and maintain quota it became necessary to split Maesteg away from adjoining wards lower down the Llynfi Valley. We felt this was an unsatisfactory solution at the time, which in light of observations made at the Cardiff hearings and comments made in 1<sup>st</sup> stage submissions we have reviewed.*

*In this instance we believe the natural sense of community identity outweighs the desire to retain historic associations. These changes make no difference to the numbers of councils in each constituency so neither strengthen nor weaken that measure and they remain within quota without any consequential changes elsewhere in our counterproposal*

*Accordingly we are now amending our original proposals in this area as follows:*

*Exchange the Caerau, Maesteg East and Maesteg West wards from the proposed constituency of Aberavon and Swansea East with the wards of Cornelly and Pyle in Bridgend.*

*The new constituencies remain within quota as follows Aberavon and Swansea East(72,862) and Bridgend (76,987).*



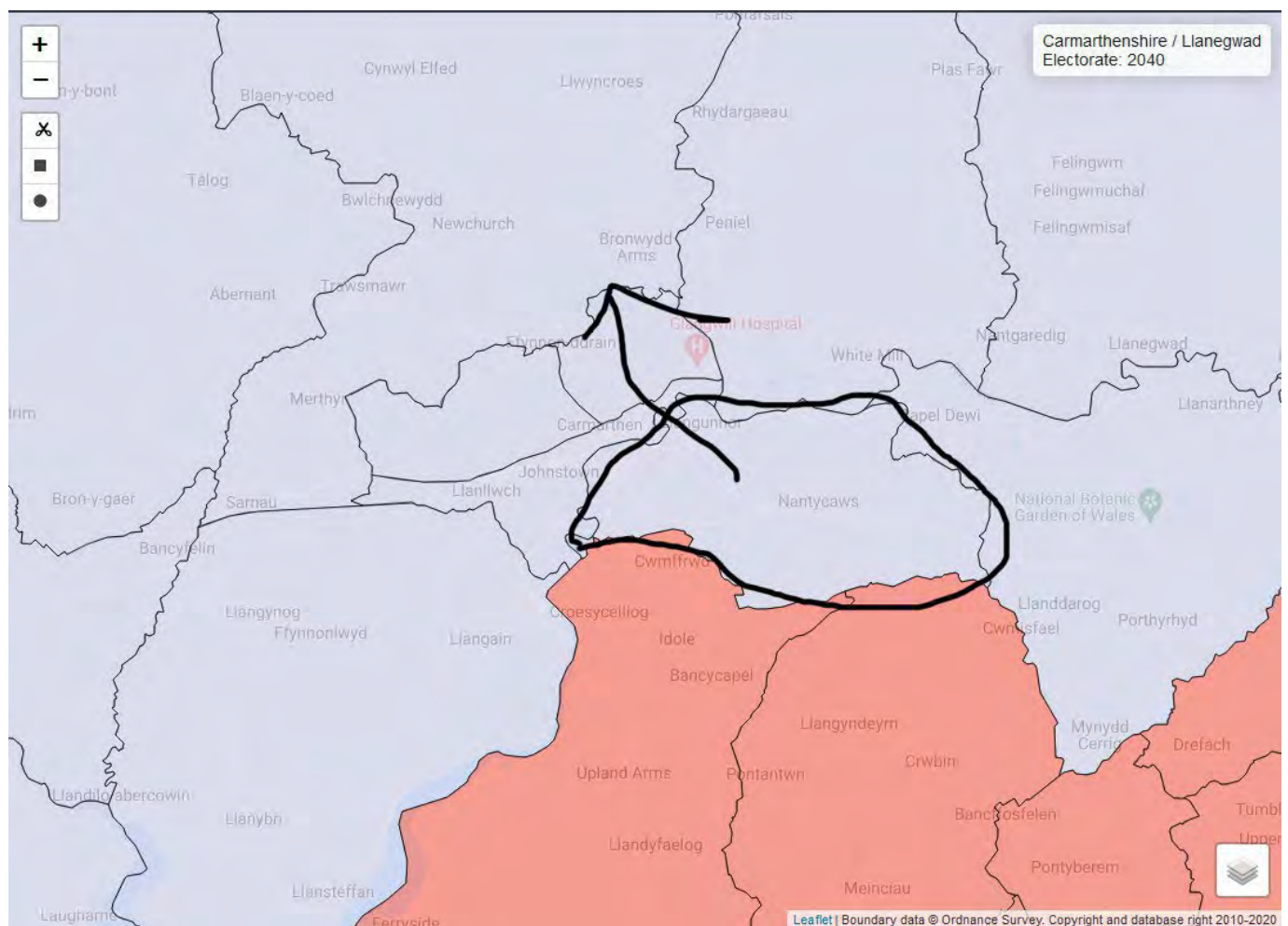
## **Changes to proposals impacting on the Llanelli and Carmarthenshire constituencies**

**The main focus in this area has been the placement of the Llangunnor into Llanelli rather than Carmarthenshire. At the initial proposal stage we didn't focus on this area as the boundaries suggested appeared superficially to be viable without alterations.**

**However, just as Pentir contains a strong integration with Bangor in the north so does Llangunnor has with Carmarthen town. Given that the movement of this ward across to Carmarthenshire can be achieved without moving either constituency outside of quota we feel it is appropriate to apply these same principles here.**

**Indeed this is also the view of Llangynnor Community Council, the local Conservative Party and the Labour MP for Llanelli so there is clearly strong local support that has been articulated elsewhere and which we will not repeat here.**

**This would leave a new Carmarthenshire at 72683 electors and Llanelli at 69895 electors.**



**Fig 2 Impact of changes proposed in the Llanelli Carmarthenshire area**



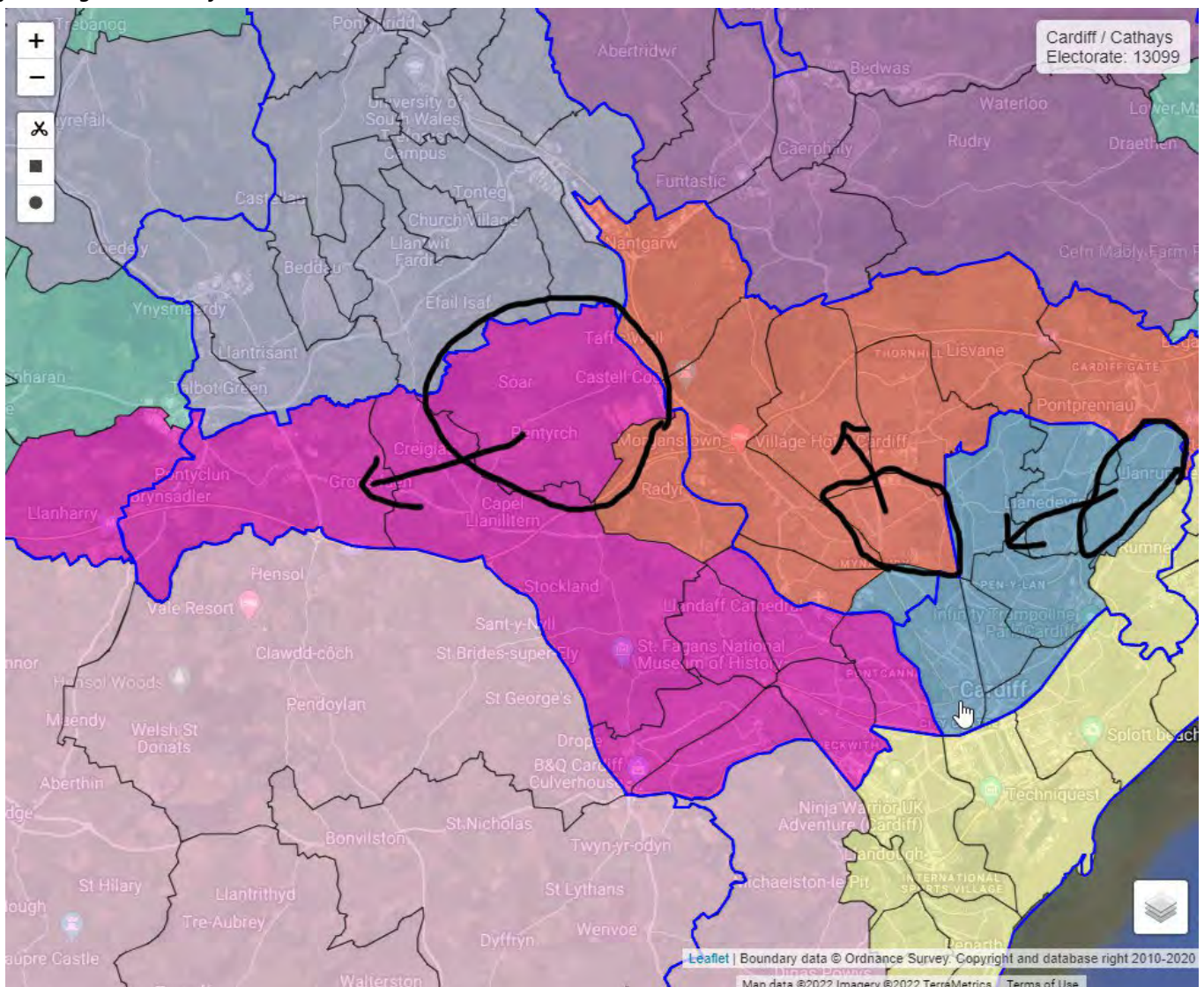
## **Changes to proposals impacting Ogmore & Rhondda and Pontypridd & Lower Cynon and the Cardiff Area.**

*In resolving the issues linked to the Trowbridge ward being detached from the rest of the Cardiff South constituency we created a constituency stretching to the west and taking wards from Ogmore and Pontypridd into a Cardiff West constituency. Having looked further at the Cardiff issues we have reached a different solution which reduces the need to take the Cardiff West seat as far to the west as we had previously proposed. However, this solution is itself dependant on how detached is defined as a concept, so we offer it as an alternative to our original plans in this area that is contained within the boundaries of 5 constituencies in our initial proposals.*

## **Changes impacting Cardiff Constituencies**

*The core problem with the Commissions proposals was that it created a detached part in the form of the Trowbridge Ward in respect of the rest of Cardiff South and Penarth. This is then compounded by the large size of electoral wards in the Cardiff Council area with large numbers of multi member wards with electorates over 5k.*

*Having listened to comments made in the 1<sup>st</sup> session we have looked again at our proposals and we now offer the following alternative for consideration.*



**Fig 3 Impact of changes proposed in the Cardiff area**



**1 Move the Heath ward from Cardiff Central to Cardiff North. This restores the ward to its legacy constituency and creates a hard boundary with Cardiff Central in the form of the A44 to the South and the railway to the east.**

**2 Move Llanrumney from Cardiff North to Cardiff Central . This is not an ideal solution as the only link across the river is via a foot/cycle bridge as the main road passes briefly though the adjoining Rumney ward. We do however now feel the additional benefits that this offers in facilitating changes elsewhere in the regions outweigh the absence of a vehicular route.**

**3 Move Pentyrch from Cardiff North to Cardiff West the final move within Cardiff allows Cardiff West to return to quota having lost two wards to adjoining the constituency to the west. It also means the the Pentyrch ward is in the same constituency as the other parts of the new Cardiff Council ward that it joins in the May 2022 elections. This creates three constituencies within quota as follows Cardiff North (70,646), Cardiff West (71,743) and Cardiff Central (73,872).**

### **Changes impacting Ogmore & Rhondda and Pontypridd**

**The changes in Cardiff have an obvious knock on effect in the surrounding wards. At this stage we therefore propose to remove Brynna and Llanharran from the Cardiff West proposal and add them to Ogmore and Rhondda and then move the Gilfach Goch ward from Ogmore and Rhondda to Pontypridd & Lower Cynon using the river as a hard boundary to ensure quota is retained.**

**This proposal reduces the number of wards from the Rhondda Cynon Taff council area that need to be included in the Cardiff West seat whilst still retaining a core of voters that are less likely to be detached from the rest of the seat than the single ward in the Commissions proposals.**

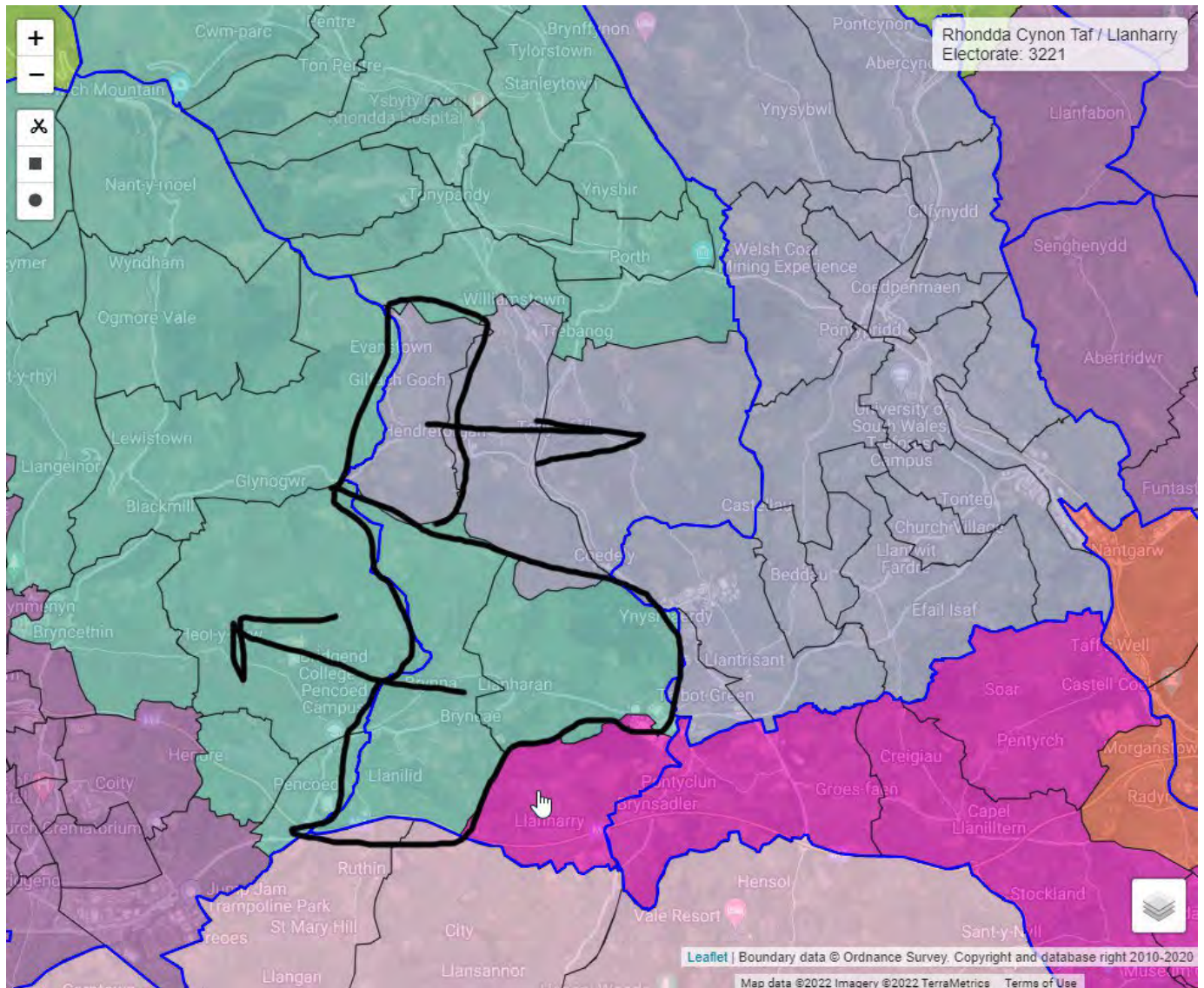
**This results in the revised electorates of Ogmore & Rhondda (75,628) and Pontypridd & Lower Cynon (75,853) both within quota.**

**This approach does have some support in responses to initial consultations BCW-9091 states**

*“As a resident in Llanharry, I don’t feel the interests of Rhondda, the constituency we’d be moved to, are shared by us in the same way as those in The Vale, or Cardiff West, or Pontypridd.”*

- **and BCW-9088 is also supportive**

*“I approve of the re-allocation of the Pontyclun and Miskin area from Pontypridd to Cardiff West”*



**Fig 4 Impact of changes proposed in the Pontypridd and Ogmore/Rhondda area**

## **Response to Counter Proposals**

*A number of all Wales counter proposals have been made during the first phase with 5 including our own presented at hearings. We consider these now along with responses to comments at first stage or hearings that offer challenge to our propositions.*

### **Plaid Cymru and Greens**

*I am considering these two proposals together as the comments that apply to one largely apply to the other but with respect to slightly different boundaries. We are aware from the Hearings that the Conservative response at this stage will contain a detailed analysis of both proposals in respect to the matching up with boundaries and retention of electorate within externally similar constituencies.*

*Whilst we commend both proposals for offering an innovative approach to the problem we find both proposals rely on making significant changes to the current status quo and include an unnecessarily high number of constituencies which span local authority, Health board and Senedd Regional boundaries. As part of our aim has been to reduce these wherever possible only need to look at the proposals in the Monmouthshire area to see a significant detrimental impact relative to the original Commission plans.*

### **Labour**

*The Labour party proposals have more merit but are hampered by their failure to address the Trowbridge (detached) issue which has significant implications for their proposals across South Wales.*

*Relative to our own proposals we would highlight the follow areas of concern.*

*In Swansea an opportunity to link together the entirety of the Mumbles community in one ward is missed.*

*In Neath the opportunity to retain the historic constituency is rejected in favour of a seat that has a significant amount of the current Aberavon constituency within it but not its entirety. This has a knock on of requiring wards from Bridgend including Conelly and Pyle as linking wards which we agree with it also includes the rest of Porthcawl area which we do not.*

*In the Vale we disagree with the plans for Dinas Powys and elsewhere in Mid and South Glamorgan there are numerous variations.*

*We do find more agreement in the far East on Newport West, Torfaen, Blaenau gwent and Monmouthshire but we disagree on how to split the Caerphilly council area.*

*In North Wales there are some similarities however the retention of the focus on Montgomeryshire does also result in significant differences.*

### **Conservatives**

*Whilst there are some areas of agreement there are also some fundamental differences most notably the proposals for Brecon and Radnorshire which we will touch on later in more detail later. Leaving that to one side for now we would highlight the following issues with the proposals.*

*In Wrexham the proposals include Brymbo and Minerva with which we concur however they also Esclusham and part of the Ponciau ward which we do not. While I recognise that this split was adopted in a previous review it was done so out of necessity and the guidelines discourage the practice especially where there are plans available which do not require such an action.*

*In the Vale of Glamorgan we are in agreement and we also welcome the idea in Swansea West of bringing Mumbles into a single constituency. However it is achieved by separating the University campus in Sketty from the extensive student bedsits in Uplands and Castle and creates a boundary splitting the catchment of Bishop Gore High School and the communities attending both local church and mosque alike so we offer up a different solution for this area.*

*Likewise the Swansea central and north seat misses the opportunity of connecting the Cwmbwla and Cockett wards whose common boundary runs though the middle of an extensive housing estate.*

*In the Cynon Valley we agree on Aberaman wards but we would consolidate further in this area and leave Taffs Wells in with Cardiff.*

*We also take a different approach to Caerphilly although we agree on the 4 constituencies in the far east of the area.*

*We have significant differences in how we view the remainder of North East Wales driven by the differences in approach to Powys. Given that this is the fundamental keystone around which many of the other decision is based we will now look closely at the issues around heading north or heading south.*

## **Brecon and Radnorshire**

*The crux of the entire remodelling of Welsh constituencies is do you take Brecon and Radnorshire north of south and if south where. There are 4 options into Carmarthenshire, into Neath into Merthyr/Aberdare or into Monmouthshire. Carmarthenshire requires a jump over a watershed or via a series of isolated villages where there is no community links or cohesion and no parliamentary history so can be rules out. Monmouthshire has attractions not least restoring communities that left in the 1980s, however the council area is of a size that can be used to make it and an neighbouring council coterminous with the parliamentary seat and this should be adopted. Merthyr and Aberdare do have some links the new emergency pathway for health care for most of South East Powys is to Prince Charles now that Neville Hall has been downgraded but there are no community ties and the road summit of the A470 at over 400m isolates the area from the bulk of the constituency so this leaves Neath as the only realistic proposition within the guidelines.*

*This leaves the choice between adding wards in as proposed by the Commission or taking a number of ward in from Montgomeryshire.*

*In the initial proposals the Commission cited similarities and cross border links between Ystalyfera and Ystradgynlais. This was further highlighted by the Conservative party identifying that this would increase the percentage of the total constituency population from this area from 12% to 33%. In their submissions they also conflate the wider Ystradgynlais areas being a town but failing to recognise the area is made up of a number of smaller settlements spread out over the area and not one consolidated identity like Brecon. A further case is made by the local MP Fay Jones that there are strong community links further north with families in the Sennybridge area as many pupils attend the Welsh medium school in Ystalyfera. Her statement to the hearings suggesting it would be nice to have it in the constituency however as Education is a devolved matter and changing constituency would still mean it is run by Neath Port Talbot there is limit merit to this argument. More puzzling is the fact that this change would she claims increase the numbers of Welsh speaker in the constituency. This is factually true but in the wider context of the constituency this could also be said to be changing the makeup of the constituency as a whole which would run counter to the aims of the review. Much is also made of the links to emerging projects however these are still emerging and whilst we hope they emerge they are not in existence today and just as with electorates to base plans on what might happen is a risk.*

*Whilst there are therefore links to a part of B+R are there links beyond and are these links significant.*

*If we look first at the education claims Powys recently published their WESP which has data on Welsh language learners and also an analysis of Sennybridge pupil numbers as part of a strategic outline case for a new build school on the site. The*



*PLASC 2021 figures show 56 pupils in the Welsh stream and 79 in the English Stream so even if all these went to Ystalyfera and none to the Welsh stream at Brecon High the suggestion that there are strong links as a result is hard to reconcile against the fact that the local YFC is based within constituency and then County for completion and junior football and rugby all link to the areas north and east indeed last year no pupils transferred at all.*

*The second issue that needs to be addressed is the administrative ties of the area Brecon and Radnorshire sites entirely within Powys County Council area, Powys Teaching Health Board, the Mid and West Wales Senedd Electoral Region, The Dyfed Powys Police area, and the Mid and West Wales Fires service. This means an MP for this area has the benefit of interacting with only one set of contacts in each service. If the boundaries were to expand north the same statement would still hold true if the Commission plans were adopted additional contacts would need to be made in all cases bar the Fire Service Points also recognised by Pontardawe Town Council BCW-9624 and Neath CLP BCW 9870 .*

*The proposals are not met with universal welcome over 20 responses highlight differences including Pontardawe TC, Neath CLP, Cllr Arwyn Woolcock, At least 25 other submissions, Plaid Cymru, Green Party BCW-9942*

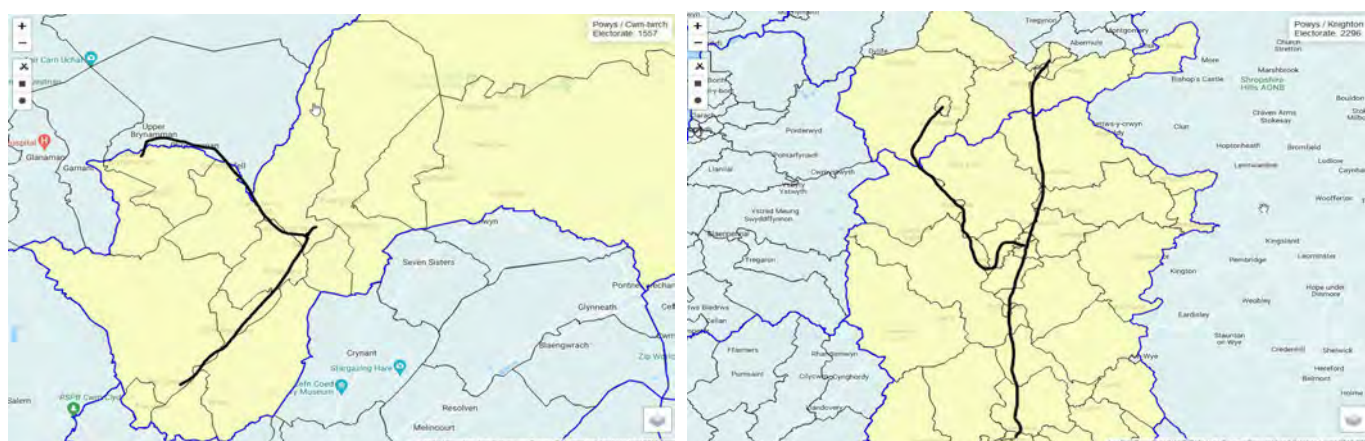
*"The proposals would cut all long held ties with other valley communities within Neath. These valley communities share a history of familiar lifestyles, cultural links, industrial heritage, and traditions. The industrial heritage and culture of the Swansea and Aman Valleys stand in stark contrast to the rural agricultural base of the Brecon & Radnor constituency"*  
BCW 9593

*The nearest large town to us is Neath and we are close to Swansea, meaning that our local ties are to these two areas, and the vast majority of us have little, if any, ties to the Brecon and Radnor area. We are separated from the majority of it by vast distances, as mentioned previously it will take over an hour to get to our new MP's clinic.*

BCW-9593

*The nearest large town to us is Neath and we are close to Swansea, meaning that our local ties are to these two areas, and the vast majority of us have little, if any, ties to the Brecon and Radnor area.*

*A number of these comments talk about the distances involved and inconvenience by road within the current constituency the most remote places are 72 miles apart by Car this increased by 5 miles for the Commissions proposals and 12 miles on the Lib Dem ones. However by public transport all parts of the new area in the south would have direct access by bus to Ystradgynlais but would need to change there to get further into the constituency and again in Brecon. In contrast both Llanidloes and Newtown the two main additional towns in the north have a direct service to Llandrindod Wells and for Newtown that then extends south though to Builth Wells, Brecon and over the Beacons to Cardiff.*



**Fig 5 No change bus access into B+R from north and south.**

*In this respect the proposals of the Commission fall short in respect of Schedule two 5 b, d and e.*

*The alternative is to move north. As the Commission are already proposing to breach all the governance boundaries*

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*indicated in the earlier discussion of the Neath are in their proposals outlined already the additional wards that this proposal adds would have no material impact on compliance in the north. So this means there is a direct improvement in respect of 5b and 5e. In respect of 5c this proposal swaps retention of Montgomeryshire with Neath so is neutral but it also facilitates the retention of Aberavon in its entirety which means in the wider context there is a betterment here too.*

*This leaves us with local ties. The proposed new health centre does indeed serve wards to the north of Newtown but will still so so regardless of the outcome of this change as it is unaffected by it. However there is significant benefit to the educational aspects and this focusses on Llanidloes and Newtown High School.*

*Newtown High School is a dual site school based on the merger of two separate schools in Newtown and Presteigne. Llanidloes is a dual stream high school.*

*As can be seen below the catchments of these two schools includes significant parts of the Brecon and Radnorshire so moving these wards into one constituency would provide representation to parents that is more consistent. With Llanidloes the catchments extends south though Pantydwr, St Harmon to Rhayader. For Newtown the entire historic catchment is included within the school including the sizeable Radnorshire towns of Knighton and Presteigne and the entire Teme Valley.*



**Fig 6 generalised school catchments in central Powys**

*Moreover unlike the areas to the south there are also strong social ties with football and rugby at a junior level taking place between these town and as far south as Brecon and YFC whilst working initially on a Montgomeryshire level eventually leads to completions at a Powys level as do Urdd competitions.*

*On a broader social network the Carnival circuit is very focussed on the towns on either side of the Montgomeryshire border and the Arts venues (Theatre Hafren Newtown, Pavillion Mid Wales Llandrindod and Lost Arc, Rhayader) draw audiences from both sides of the border*

*So again by comparison with the southern area there are significant cultural interactions that extend significantly into the*

*central part of Brecon and Radnorshire in a way that they don't from the Pontardawe area which looks to Swansea and Neath not Brecon for cultural entertainment. Leading to a betterment on grounds 5d.*

*So in conclusion far from being the least bad option as expressed by one contributor the proposal to link south rather than north is significantly poorer in terms of cultural opportunities, administrative boundaries, access by public transport, ability for the MP to develop relationships and community identity.*

## Concerns raised during the first consultation round addressed by Welsh Lib Dem proposals.

*Having considered the counter proposals and explained the basis for focussing the data model on a B+R north approach rather than a B+R south as proposed by the Commission it is worth considering if this approach also fits with concerns raised during the first consultation. This section therefore highlights representative examples of where the Welsh Liberal Democrats Proposals address these concerns.*

### Vale of Glamorgan

BCW-9019

*"As a resident of Dinas Powys, Vale of Glamorgan, I am very concerned that the new boundary will place this area in Cardiff."*

BCW-9930 Alan Cairns MP & BCW-9960 Cllr Stephen Griffiths

*Comments against the removal of Dinas Powys from Vale of Glamorgan*

*This change is reversed in the Lib Dem Proposals.*

### Llanharry is not part of the Rhondda

BCW-9091 states

*"As a resident in Llanharry, I don't feel the interests of Rhondda, the constituency we'd be moved to, are shared by us in the same way as those in The Vale, or Cardiff West, or Pontypridd."*

BCW-9088

*"I approve of the re-allocation of the pontyclun and Miskin area from Pontypridd to Cardiff West"*

*This concern is met by including the Llanharry ward into the revised Cardiff West constituency within these proposals strengthening the cohesion of the original proposal as supported by 9088.*

### Caerphilly

BCW-8916

*"I do not wish for Maesycwmmwr to return to Islwyn constituency"*

BCW-9143

*"I would like to object to the proposed new constituencies. You have somehow managed to break up the Rhymney Valley - an area stretching approximately 15 miles - in to four separate constituencies."*

BCW-10057 / Colin Mann

*"I represent Llanbradach as a County Councillor. I object to my ward being separated from the rest of the Caerffili basin area to which it has a natural affinity."*

BCW-10065

*"Nelson ward in the County Borough of Caerphilly is the only Caerphilly ward to be allocated to the proposed parliamentary constituency of Merthyr Tydfil and Aberdare. This breaks the local ties with all other wards in Caerphilly CBC"*

BCW-9934

*"In my opinion there are a number of areas in the Islwyn constituency which would more readily identify with Newport than Caerphilly, and they already benefit from better transport links with Newport"*

*All these concerns stem from the choice to focus on the Islwyn as opposed to Caerphilly constituency as the core of a constituency in this area. We believe that by focussing on Caerphilly as the core it is possible to address the Nelson orphan issue and a cascade of other issues further west. We have listened to suggestions that the links from Caerphilly to Newport*



are stronger but a simple review of an air photo shows there is far closer linkage of northern Newport with the valley below Risca making the Islwyn Newport link far more sustainable. It is specifically worth noting that the Welsh Lib Dem Proposals are broadly similar to that submitted by Wayne David MP BCW 9929.

## **The Upper/Lower Cynon split**

BCW-8991

*"Whoever drew up these plans can't have visited the area..how can the villages of Cwmaman and Aberaman be joined to Pontypridd?? It takes twice as long to drive to Pontypridd than Merthyr a start..or 2 buses as opposed to 1 bus. This proposal completely destroys the Cynon Valley"*

BCW-9272

*"Why are Aberaman, Cwmaman and Godreaman not being included in Aberdare. We are traditionally from that area. I don't agree that the boundary should exclude us from our traditional town. The border has always been at Abercwmboi splitting Aberdare and Mountain Ash and I feel that's how it should remain"*

These comments are indicative of a significant number of similar comments seeking the addition of wards to the south of Aberdare into the Merthyr Constituency which can be facilitated by our changes in the Caerphilly area that mean Nelson is moved out of the Merthyr constituency.

## **Retaining a Bridgend focus**

BCW-8925

*"ABSOLUTELY RIDICULOUS including porthcawl, pyle, Kentish hill etcetera in with aberavon ABSOLUTELY no historical or social links boundaries should remain with Bridgend as that is where the ties are"*

BCW-8961

*"I do not agree with Broadlands and Laleston being moved into the Aberavon constituency instead of Bridgend. Half of the Broadlands estate would be in Bridgend and the other half in Aberavon. How ridiculous"*

BCW-8989

*"In the proposals, I would become part of the Porthcawl and Aberafan constituency. My address is literally 1 mile from the centre of Bridgend town centre, but over 5 miles from Porthcawl (further from Aberafan)"*

These are representative of a number of comments opposing the split of the coastal part of Bridgend from the urban centre. These concerns are addressed fully in our proposals.

## **Combining the towns in southern Clwyd into a rural focussed seat**

BCW-8934

*"Ponciau, penycae, acrefair, rhosllanerchrugog and Ruabon should all be in the same voting district"*

BCW-9202

*"i live in Ponciau near wrexham and it is very much the case that the communities of Johnstown, Ponciau, Rhos and Pen-y-cae function as a single community"*

BCW-8858

*"Rhuthun is in the Vale of Clwyd, geographically, socially, culturally and historically connected with the rest of the vale. It is separated from communities to the East by the Clwydian Hills."*

BCW-8890

*We (Ruthin) are a rural town, and our demographics and priorities are more similar to places like Denbigh, Llangollen and Corwen; surely it makes more sense to be represented in the same constituency*

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*as these?*

*These are just a sample of the comments that seek to ensure the rural characteristics of towns in the current Clwyd South area are retained in a comparable constituency. By moving Brecon and Radnorshire northward it is possible to achieve this drawing these towns into a new seat with the northern parts of Montgomeryshire.*

### **Retaining Wrexham council seats together in the N**

**BCW-9975/ Paul Rogers/**

*As County Councillor I feel that dividing the County Council area between three constituencies would be confusing for the electorate. I propose that Brymbo and Minera Wards should be removed from the proposed new Alyn and Deeside Constituency and placed in Wrexham. This is the unanimous view of Community Councillors representing Brymbo and urge the Commission to consider our representations.*

**BCW-8870 / BCW-8882**

*As above but personal comment*

*This is a change we made for similar reasons.*

### **Swansea**

**BCW-9957**

*"Sketty, Uplands, and Castle Wards are heavily populated by Swansea's Muslim communities, both the Central Mosque, Shia Mosque, and a new proposed 89 Islamic Community Centre will be in this geography in Sketty. The Muslim community is until now represented by one MP and MS. These wards are also heavily populated by other minority groups and would be a shame if we split them into two different constituencies"*

*By making a north south split to the west of the river this comment and many similar can be addressed.*

### **Integration of Pentir with the rest of Bangor**

**BCW-8866**

*I live in Bangor and can see no justification for the city being split in half*

**BCW-8883**

*It is unthinkable that the city of Bangor is going to be separated out into two separate Constituencies. The city including Penrhosgarnedd should have one MP. To split it would mean two MPs representing the same city resulting in unnecessary confusion and duplication*

*These are two representative comments of a large number of responses identifying the same anomaly in the Commissions plans that we did and have resolved.*

### **Retaining the linkage between Uwchaled, Llansannan and Llangernyw**

**BCW-9010**

- *There are lifelong ties between Uwchaled (Llangwm), Bro Aled (Llansannan) and Bro Cernyw (Llangernyw). These are historical, agricultural, geographical, linguistic, and cultural ties.*

*This linkage is retained in the Welsh Lib Dems proposals.*

## **Conclusions**

*This document taken with the original submission offers a considered counter proposal to that put forward by the Commission. As outlined above it addresses a number of the issues raised by members of the public who have concerns about the local issues that the Commissions proposal create.*

*It also lays out in some detail the rationale behind why the development of a Brecon and Radnorshire northward approach is the better basis on which to develop the proposals for the whole of Wales rather than the southward option taken by the Commission.*

Boundary Commission for Wales,  
Hastings House,  
Fitzalan Court,  
Cardiff,  
CF24 0BL

17.03.2022.

Dear Chair,

**Re: Aberafan Porthcawl**

I am writing to provide my support for the proposed plan to join the constituency of Aberavon with Porthcawl creating Aberafan Porthcawl.

I support this proposal for several reasons. Firstly, the new areas that will be added (currently part of the constituency of Bridgend) share similarities to areas in Aberavon; for example, both Aberavon and Porthcawl are seaside towns.

Secondly, I believe that the proposed new constituency takes into consideration historical and transport links that are at the core of communities in Aberavon. Similarly, it respects the links between Port Talbot and the Afan valley.

I believe that the counter-proposal – in which areas of Ogmore would be joined with Aberavon – do not work because of poor transport links.

I believe that the proposed new constituency should be Aberafan Porthcawl for the reasons outlined above. This will also ensure the new change is in line with the rules the Boundary Commission must follow.

Yours sincerely,

[REDACTED]

[REDACTED]