

BOUNDARY COMMISSION FOR ENGLAND
2023 REVIEW OF PARLIAMENTARY CONSTITUENCY BOUNDARIES
REPRESENTATIONS RECEIVED ON THE INITIAL PROPOSALS FOR THE
LONDON REGION

COMMENTS OF THE CITY OF LONDON CORPORATION

1. The City of London Corporation welcomes the opportunity to comment on the representations received by the Boundary Commission on its initial proposals.
2. We consider that the published representations provide strong support for the arguments we advanced in our submission on the initial proposals ([BCE-83944](#)), particularly concerning the historic connection between the Cities of London and Westminster, and the community of interest between them. In addition, we wish to draw attention to the following points:
 - 1) Two of the three main political parties (the Liberal Democrats and the Conservative Party) have advanced counter-proposals which would combine the City of London with the City of Westminster ([BCE-80979](#) and [BCE-86589](#)), while the Labour Party's representation ([BCE-79496](#)) recognises the consequences for other London constituencies of combining the City of London and wards in the London Borough of Islington.
 - 2) The Conservative Party's proposal, which would retain the link between the Two Cities is echoed in the counter-proposals made by Conservative MPs Greg Hands, MP for the current seat of Chelsea and Fulham ([BCE-85525](#)), and Felicity Buchan, MP for Kensington ([BCE-82504](#)), as well as by the significant number (over 1000) of respondents who have endorsed their alternative proposals. While these do not comment directly on the relationship between the Cities of London and Westminster, they do support the retention of the link between the Two Cities as a consequence of their counter-proposal to maintain Chelsea's integrity in a single constituency.
 - 3) In total, 105 submissions, including our own, more directly support a combination of the City of London and the City of Westminster (as proposed in our submission), or oppose a combination of the City of London and wards in the London Borough of Islington (as proposed by the Commission). These submissions are enumerated, for reference, in the appendix to these comments.
 - 4) Of these 105 representations, where it is possible to determine the residency of a respondent, it appears that 7 were made by residents in the City of London and 26 by residents in the City of Westminster. The remainder came from a range of individuals, including businesses, elected council members in the City of London and in the City of Westminster, workers in the City of London, and other members of the public whose connection to the City of London it is not possible to determine using the information made available by the Boundary Commission.
 - 5) Only 18 submissions offer support to the proposal to combine the City of London with wards in the London Borough of Islington. Of these, none, in the City Corporation's view, offer any substantive reasoning in favour of the combination that would override the value of the existing combination of the Two Cities. Where it is possible to determine the respondent's constituency, only 4 were made by residents in the City of London ([BCE-56059](#), [BCE-57538](#), [BCE-64303](#)

and [BCE-79232](#)), 4 were made by residents of the London Borough of Islington ([BCE-56740](#), [BCE-57836](#), [BCE-75567](#) and [BCE-78413](#)) and 1 was made by a resident in the City of Westminster ([BCE-73038](#)). A further 3 were general counter-proposals for the entire Greater London region ([BCE-81615](#), [BCE-85346](#) and [BCE-85352](#)).

3. In her response to the Boundary Commission ([BCE-75567](#)), Ms. Emily Thornberry MP, the Member of Parliament for Islington South and Finsbury, posits certain ties between Islington, Finsbury and the City in order to support the Boundary Commission's proposal for a City and Islington South constituency. It might be helpful for us briefly to address these, insofar as they might touch on the arguments made in our submission:

- 1) History. While there are clear historic links between the City of London and Islington, and, as Ms Thornberry notes, Islington owes its development to the proximity of the City, this is equally true of other boroughs neighbouring the City, such as Tower Hamlets and Southwark. It is the City Corporation's view that these links fall short of those between the Two Cities that saw London and Westminster develop as the historic heart of the capital.
- 2) Transport. We acknowledged in our submission that the City of London enjoys strong transport connections with all of the surrounding boroughs, including the London Borough of Islington. However, we cited figures showing a far greater flow of road traffic between the City of London and the City of Westminster. We have seen no evidence in relation to other forms of transport that stronger connections exist with the London Borough of Islington than with the other surrounding boroughs.
- 3) Education. The City Corporation, along with the City's livery companies, has a strong history of supporting educational institutions in the City and all of its surrounding areas. While the Corporation's multi academy trust sponsors four academies in the London Borough of Islington, a further three are found in Southwark, two in Hackney and one in Newham, demonstrating strong educational links elsewhere.
- 4) Residents. It is correct to state that many City workers live in Islington. However, many also live in Westminster, as demonstrated by a number of respondents to the Boundary Commission, and the community of economic interest is greater between the two cities than between the City of London and Islington. Aside from those economic and business links set out in the City Corporation's original submission, a recent report by GoDaddy found that the Cities of London and Westminster contained the greatest number of microbusinesses, at 13.33 per 100 people, while there were only 4.99 per 100 people in Islington South and Finsbury. While it is true to say that the City of London Corporation manages social housing estates in Islington, it also manages estates in the London Boroughs of Hackney, Lambeth, Lewisham, Southwark and Tower Hamlets, and does not feel that the representation of residents of these estates is affected by the fact that they sit in constituencies outside the City's own.
- 5) Health. While the Barts Health NHS Trust plays an important role in delivering hospital services in the City and Islington, healthcare links with Islington are weaker than with other neighbouring boroughs, such as Hackney. For example, the City of London sits in the North East London Clinical Commissioning Group with Barking and Dagenham, Hackney, Havering, Newham, Redbridge, Tower Hamlets and Waltham Forest, while the City of London's primary care trust is with Hackney.
- 6) Hospitality. While it is no doubt true to say that some City workers cross into Islington for pubs, restaurants, cafes and markets, it is also true of Southwark, particularly Borough Market and the area around London Bridge, and other neighbouring boroughs. As noted in the Corporation's

own submission, the recreational and cultural offer of the City of London has a greater similarity with Westminster than Islington.

While the City Corporation values highly the relationship and historical connections between the City of London and all of its neighbouring areas, our view is that the ties posited in Ms. Thornberry's submission do not demonstrate any significant community of interest between the City of London and the London Borough of Islington, and fall considerably short of the exceptionally deep and multifarious community of interest between the City of London and the City of Westminster (as described in our submission).

4. In conclusion, we submit that the representations provide strong and diverse support for the continued constitution of the City of London with the major part of the City of Westminster for the purposes of parliamentary representation. We hope that these brief comments are of assistance to the Commission in its deliberations.

Guildhall, London
April 2022

APPENDIX: TABLE OF REPRESENTATIONS

(By the unique reference numbers assigned by the Commission.)

I. In favour of the combination of the City of London and the City of Westminster, or against the combination of the City of London and wards in the London Borough of Islington:

Residents in the City of London:

66061 67481 67594 70775 79617 79680 84993

Total, 7.

Residents in the City of Westminster:

66016 67776 70688 70694 70797 73557 73978 74011 75121 77292 79411
79995 82592 82665 82694 82701 83014 83277 83364 83455 83593 84036
85084 85195 85230 86172

Total, 26.

Others:

52359 52486 54286 57009 57033 57040 61555 66064 66209 66360 66573
67762 67805 67892 68068 68314 68495 68663 69125 69537 69681 70168
70365 70881 70969 71332 71620 71807 71874 72412 72414 73024 74104
74749 75164 75655 75953 77079 77095 77163 77247 78064 78137 78828
79236 79433 79466 81184 82091 82221 82420 82759 83071 83390 83460
83655 83802 84052 84162 84761 85128 85229 85271 85365 85596 85697
85856 85910 86163

Total, 69.

Total, 102.

N.B. The table excludes representations from Ms. Emily Thornberry, M.P., the City of London Corporation, the Conservative Party, the Labour Party, and the Liberal Democrats.