

Dear LGBCE,

I know that you are keen to ensure that York's updated electoral boundaries are fair, and benefit York's residents and communities.

Therefore, please consider the issues highlighted below when drawing up your proposals over the next couple of months.

Kind regards,



## Context

When I contributed to the last boundary review as Chair of the York Open Planning Forum, I engaged with residents apolitically. Residents highlighted to us a number of well-established issues – with the geography of York, the unusual history of our parish boundaries, and the uneven democracy and electoral status across the city.

Over the last 15 years, these issues haven't just persisted, but worsened. These issues are regularly raised in Council meetings, by members of the public as well as councillors. I am writing in a personal capacity, as a continuation of my personal interest and involvement, to highlight my own individual concerns on those two significant and specific topics. I note for transparency that I am now also a unitary authority councillor, but in this response I draw more heavily upon my career and experience in data analytics and York social engagement.

The reason that I want to provide this context is that York has a *unique and complex* history.

At a time when Yorkshire was divided between three ridings, York sat outwith those 'thirds'. The local authority area of York includes areas that at various points in history sat in North, West and East ridings, with parishes moving in and out of the city boundaries depending on the year and the map. The parliamentary constituency of York (or the City of York) had a common central core from 1265 to 2010 with numerous changes to boundaries around the edges.

We have only had consistent council boundaries for 30 years, and coterminous parliamentary constituencies for the last 15 years. This is why, particularly in the urban and suburban areas, our parish boundaries have become increasingly nonsensical 'divisions' when compared with the hard boundaries of our river, walls, outer ring road, and railway lines. They are often a terrible representation of the boundaries between our communities, in many cases splitting a clear community or passing directly through properties that have been there for many years.

At the same time, the widening gaps over several decades in wealth, health, deprivation, democratic engagement, representation, age and (consequently) councillor casework has become increasingly apparent. York now has one of the highest average living costs in the north of England, yet also has one of the highest numbers of low-wage retail and hospitality jobs alongside a steep decline in the industries that were most prominent in the last few centuries.

My home suburb/town of Acomb is now a sea of over 10,000 houses with insufficient public green space and no large employers – which means that it is sadly unsurprising that the latest 2025 IMD data lists multiple Acomb area LSOAs in the national bottom decile for employment, skills, and health, while 37 York LSOAs rank in the top decile overall.

York's poorest ward experiences a life expectancy of 75 for men and 80 for women, while the richest ward experiences 87 and 92. This 12-year difference in life expectancy mirrors a huge rich-poor gulf that can be seen across all common ways of measuring wealth or deprivation – and no doubt any neighbourhood stats were they to exist would have an even greater gulf.

This unsurprisingly has consequences for casework levels, with a significant gap between poorer (generally densely populated) and wealthier (generally rural/village) wards. Unfortunately this negatively correlates with two things – that more people are registered to vote in more affluent areas, and that these are usually the areas of the city that are parished.

I'll explain below how these "local needs, views and circumstances" present risks to creating boundaries that are "appropriate, and reflect community ties and identities". My simple request is that the LGBCE prioritises accurate modern boundaries, and improves the equality of councillor ratios against need.

### **The accuracy of provided data**

Before I begin, I just wanted to raise small concerns on the accuracy of the published data, having used it for a number of weeks.

The data quality is very good in general, and aside from a couple of minor typos I only have two comments. Firstly, the consistency and accuracy of elector change estimates. Secondly, the effect of last year's polling district review.

Knowing a number of the local areas quite well, I am not convinced by a number of elector growth estimates. There are a number of extremely large housing developments that have received planning permission and are in various stages of delivery, and the estimate numbers don't align with the latest numbers I have seen for some of these. The impact of HMO and AirBnB conversion and adaptations to properties that increase population density will also not be linear over the last decade to the next decade, especially in areas that have had increased controls put into effect or that already approach viable limits.

One example I'm relatively familiar with is the British Sugar and Manor School Field site that on paper straddles Acomb and Rural West wards – but all houses that will be built by 2031 will be within the current Acomb ward boundaries. I am not an expert on these matters, and I don't know every site well, but I'm certain that there are numerous experts in the Council and people writing to you who can provide localised commentary (and finessed or updated information or data) and I humbly request that you take these into account.

Approaching analysis from another direction, the polling district elector numbers are provided against polling districts that are no longer correct, but the file is dated November 2025. This has meant extra work in cross-referencing old and new polling district names/codes for me – but it also means that it's not crystal clear which boundary is used where these boundaries have changed in the last 12 months.

As this year's polling district boundary changes were generally small, there might not be a large visible impact, but as with all boundary reviews those small numbers can sometimes have larger ripple effects. It would therefore be useful to iron out any ambiguity before completing your proposals, and to aid with the consultation from May.



## Boundary Strengths in York

The most notable and visible issue with the existing boundaries can be plainly seen on the very basic map the LGBCE has presented to all residents. I have marked the two ring roads, city walls, rivers, and the railway lines in yellow below in Figure 1 for some visibility, whenever they do not align with an existing boundary.

These are almost always extremely clear community boundaries – one or two level crossings do not divide communities, the inner ring road and walls have a few houses between them, and there are occasional properties that can be accessed from the other side of the river.

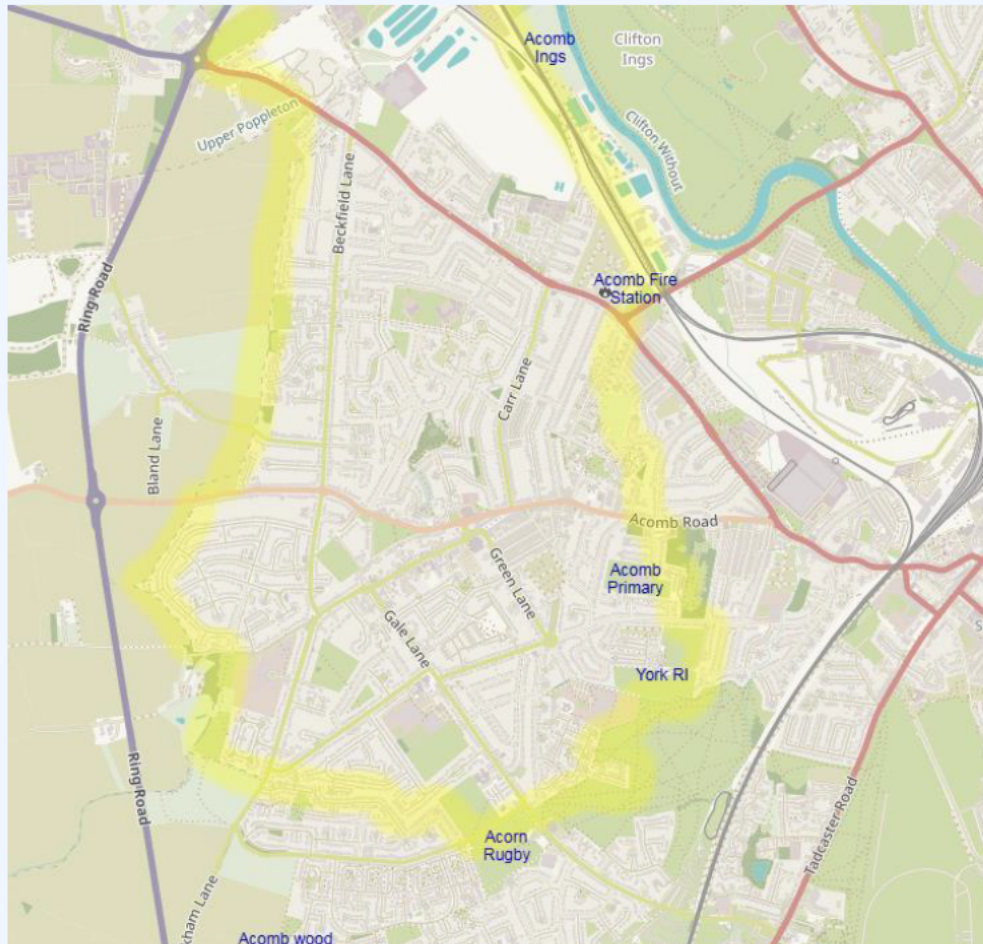


Figure 1; York

There are numerous subdivisions that have clear extant boundaries, whether parish boundaries, residents' associations, hard organic boundaries, or local spoken convention. Using examples local to me, places like Foxwood and Chapelfields have relatively well-established borders, but boundaries in a continual suburbia (e.g. Acomb, Westfield and Holgate) can be much less clear.

When I was Secretary of the Acomb & Westfield Neighbourhood Forum, we attempted to understand what the boundary of Acomb was today – not the historical boundaries, but the boundaries understood or experienced by people who lived on each street. We asked people on most of the boundary streets what their thoughts were, and while there were a couple of spots of ambiguity we were surprised that the vast majority of residents agreed with one another.

The result was the boundary marked below in Figure 2, generally but not always backed by local place name conventions, and more ‘real’ than ward naming conventions. I have marked on this map some local places that have Acomb within their name or address, which often sit outside the Acomb and Westfield wards. Indeed the vast majority of the Acomb area sits outside Acomb ward today, which is a regular challenge for Acomb councillors.



*Figure 2; Acomb town/suburb*

This Acomb ‘town’ marked on the map is circa 17,500 electors and 25,000 residents. It also contains one of the largest brownfield housing development sites in the country, the aforementioned British Sugar and Manor School Field site, which is expected to be heavily populated within a decade. This ‘Acomb area’ is far too large to be one ward, so all proposals are unlikely to find a genuine community boundary to use.

I’m certain that this is true across most urban areas that the LGBCE works with, as it is a consistent truth across York’s urban area. It makes genuine internal boundaries difficult to identify and draw, and it is expected. But until recent decades in York this issue was almost entirely contained within the unparished area, and even urban streets had more gaps between them. Unfortunately, in the map above, the highlighted area of Acomb bleeds across four wards and three parishes, despite our fairly coherent community and 1,000-year history.

Sometimes it is hard to identify a good or bad boundary – but sometimes it is extremely clear when the boundaries make no sense. What is best for local residents is an accurate portrayal of local communities, which the LGBCE states as a core principle. Yet for a long time, all across our city, parish boundaries clearly demonstrate numerous problems at a local level.



While there have been mechanisms and opportunities to address these problems, they have remained relatively opaque to the average resident and have mostly not been used for many years. Future fixes are possible, but could be both contentious and incompatible with LGBCE proposals. I sincerely hope that you ‘take the bull by the horns’ and implement the well-overdue changes.

### Parished vs Unparished Areas/Boundaries

Before I begin, I should stress that this is no criticism of parish councils, the history of parishes and their boundaries, nor the reasons that the boundaries came to be. However, these historical boundaries are often not representative of modern York. And some ‘clear from space’ boundaries, such as the A64 dual carriageway, might not be seen as beneficial to specific residents/landowners within a parish or some people sitting on parish councils.

So, again, things in York are pretty unique.

A Community Governance Review after this process could tidy up the occasional cul-de-sac. More substantial problems could make this process difficult for the LGBCE, as they would dramatically change the voter-per-councillor ratio and change the extent to which wards are viable, which makes a CGR ‘cleanup’ less viable than guidelines would usually anticipate.

In my personal opinion, the most sizeable example of this is on the fringe of Acomb, where three parishes with open fields meet the edge of the suburb, in Figure 3. The strong boundaries of the ring road and railway lines are marked in yellow and the archaic parish boundaries are marked in blue, which weave across fields and houses and gardens – and split communities.



*Figure 3; Acomb's Langley Gate, Portal Road, Westview Close, Villa Court*

Poppleton has already requested that their two parishes merge. The divisions between Upper and Nether Poppleton go through the middle of properties, as does the boundary between both Poppletons and Knapton, and all parish boundaries against the unparished Acomb area. Hundreds of new houses are now also impacted by a set of archaic boundaries that fold back on themselves and also cause unnecessary problems for residents.

It is clear from that aerial photo, taken since the start of building the Langley Gate development, that there is a separation of fields and ring road between Acomb and Poppleton. Yet for the residents who live a fence's width from neighbours in Acomb they are mysteriously required to *drive* through other parishes or areas to get to their polling station in a different village. One property on Low Poppleton Lane sits in a different *constituency* to the rest of their street.

Protecting the parishes means that where a parish grows *outwards* there isn't an issue but where the unparished area grows *inwards* there is.

Fulford's parish boundary does not actually include Fulford police station, 'Fulford shops', Fulford barracks, and The Fulford Arms, all of which sit clustered half a mile into Fishergate ward. Contrarily, on the OS map of where Clifton and Rawcliffe meet (Figure 4), the label for 'Clifton' sits a 15-minute walk outwith Clifton ward, with the Rawcliffe parish boundary scything through houses, gardens, roads, and a school, instead of flowing along the back of the communities where a natural gap has been clear for many years.

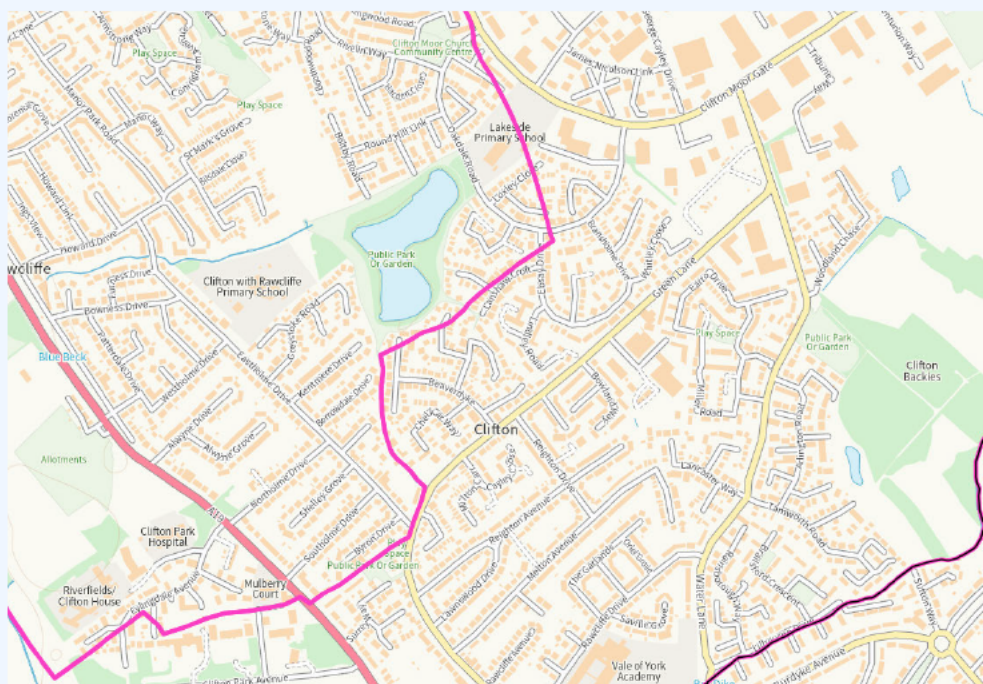


Figure 4; outdated parish boundary; Clifton, Rawcliffe

The most prominent and notorious disconnect in the city is probably that of the modern eco-village of Derwenthorpe. The majority of residents access from Heworth/Tang Hall, and literally can't access their streets from Osbaldwick by car. The site sits at the end of the Clifton/Heworth/Tang Hall cycle lane. The buildings are modern, environmentally friendly, and have multiple types of ownership; Osbaldwick's older houses are very different.

As such, Derwenthorpe residents are a distinct community, and the demographics of Derwenthorpe and Osbaldwick are different in multiple ways.



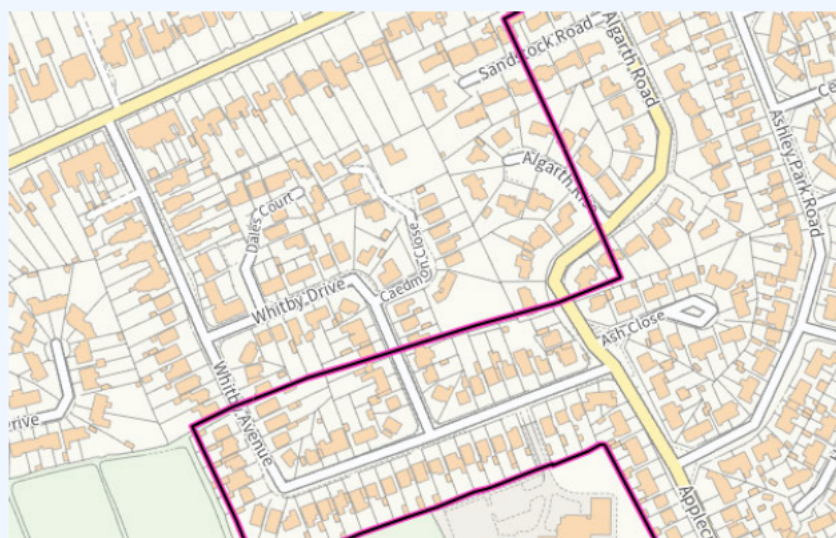
If looking at the aerial view in Figure 5, it would be extremely unlikely that a single local resident would draw the current ward boundary. A corner of Derwenthorpe sits adjacent to Osbaldwick, but the site faces westward.



*Figure 5; Derwenthorpe*

Some parish boundary issues could be mopped up in a CGR, but I believe the LGBCE should consider the circumstances of each one and weigh up the potential impact of a likely change.

Figures 6-10 clearly demonstrate that necessary and obvious fixes have not been implemented across the many decades that houses and boundaries – and the A64 dual carriageway – have been there. This is a failure by multiple different authorities, and countless administrations, but the LGBCE has the ability to resolve this without delay. It is self-evident that residents need improvements, so the issue isn't just that a thorough CGR could result in changes at odds with the final LGBCE boundaries.



*Figure 6; outdated parish boundaries cutting through houses; Heworth Without*

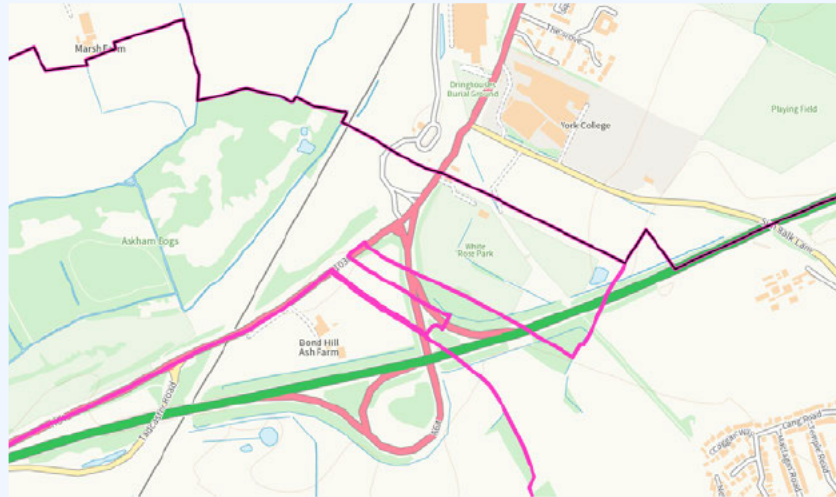


Figure 7; outdated parish boundaries; four 'areas' by Askham Bar



Figure 8; outdated parish boundaries cutting through houses; Wigginton, Haxby

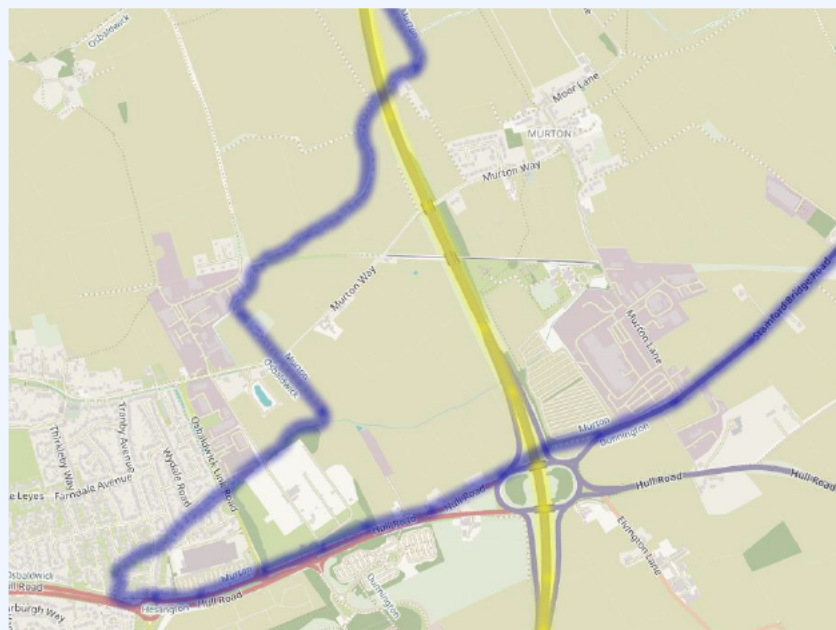


Figure 9; outdated parish boundaries; Murton, Osbaldwick, Hull Road





Figure 10; Hopgrove Lane community split by a boundary that ignores the A64

Figure 1 at the start of this report showed the yellow ‘strong and modern’ boundaries *repeatedly* neglected, and I implore the LGBCE to consider each occasion where the rivers, railway lines and ring roads are ignored in favour of weaker boundaries (often including parish boundaries).

That said, it is worth noting that there are circumstances where this may not be advisable. Between Huntingdon and New Earswick there are some houses on each side of the river that can only be accessed from the other side, making them a de facto member of the ‘opposite’ community. There are also a few (albeit infrequent) occasions where this is true of the railway line and ring road.

It is unlikely that the LGBCE will receive many proposals to tackle the issue of parish boundaries, solely because your public advice is to deal with them after the fact.

But I personally strongly believe these are extreme, unique, circumstances – that parish wards around Portal Road, Langley Gate, Heworth Without, Derwenthorpe, Fulford, and many other places would result in significantly better community boundaries. If the LGBCE can use a recent CGR as evidence in its proposal, surely an absence of any CGR can also be used as evidence?

## Elector numbers

In 2025 the UK government announced reforms that will bring the elector numbers much closer to the total number of residents, including enabling 16-year-old voters, automated registration, reduction of registration and voting barriers, and much more. Elector numbers are never identical to resident numbers, but taking these changes into consideration the (current) estimated 2031 elector count is therefore erroneous and skewed towards more affluent areas.

Beyond the general accuracy of predictions, it is also backwards when looking at the purpose of councillors – namely that those who are most disenfranchised need the most representation, and those who have the most complex needs require the most engagement in casework. On top

of that is the uneven democracy and workload created by unparished vs parished areas, which contribute to both the uneven voter registration levels and the uneven casework volumes.

To give a brief demonstration of the challenges in a York context, consider Figure 11's illustration of eight labelled Outer/Central (ring road split) North/South/East/West (river/rail split) areas.

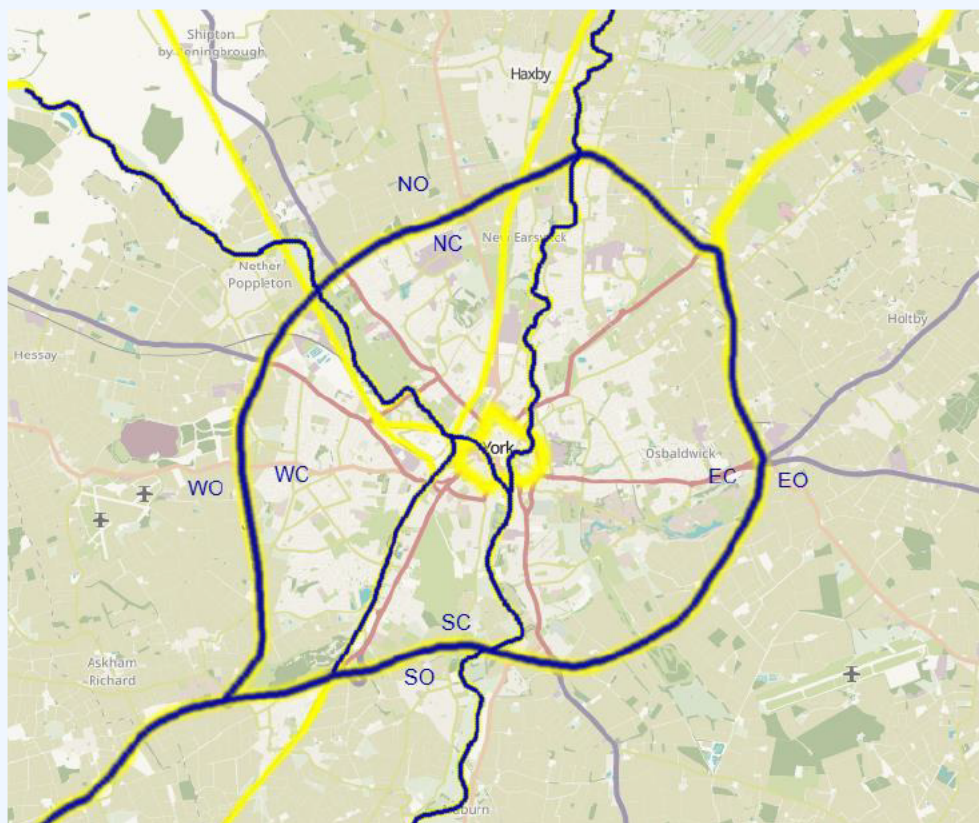


Figure 11; York, labelled by segment

Within this illustrative example, the estimated 2031 elector:resident ratio varies a lot:

Area	Wards or Polling Districts*	Electors	Residents	E:R
North Outer (NO)	Haxby & Wigginton; and OKH	11,422	13,753	83.1%
North Central (NC)	Rawcliffe & Clifton Without; Clifton; Guildhall exc. CDE; OGC; and a third of CEA	27,889	37,762	73.9%
East Outer (EO)	Strensall; Wheldrake; OHD, OHE, OHF and 80% of OHC	14,075	17,812	79.0%
East Central (EC)	Heworth exc. a third of CEA; Huntington & New Earswick exc. OGC; Heworth Without; Hull Road; Fishergate; Fulford & Heslington; CDE; OHA, OHB, and 20% of OHC	53,916	78,441	68.7%
South Outer (SO)	Bishopthorpe; and Copmanthorpe	7,293	8,799	82.9%
South Central (SC)	Micklegate; and OCA	14,773	18,320	80.6%
West Outer (WO)	OKA, OKB, OKD, OKE, 80% of OKF, and 60% of OKG	4,073	5,351	76.1%
West Central (WC)	Holgate; Acomb; Westfield; Dringhouses & Woodthorpe exc. OCA; OKC, 20% of OKF and 40% of OKG	36,603	48,386	75.6%



*\* note, as already mentioned, that the correct post-May-2025 Polling District names here do not align with the outdated names in the Electorate figures file available on the LGBCE website.*

These estimates are calculated from source estimates and are imperfect. However, regional ratios are less skewed than ward levels, which currently vary from around 53% to around 84%, and directly correlate with level of wealth or inversely with poverty/deprivation metrics.

To make explicit the consequence of that on the difference between population and elector ratios against 47 councillors:

Area	% of electors	% of residents	of 47 (by e %)	of 47 (by r %)
North Outer (NO)	6.7%	6.0%	3.2	2.8
North Central (NC)	16.4%	16.5%	7.7	7.8
East Outer (EO)	8.3%	7.8%	3.8	3.7
East Central (EC)	31.7%	34.3%	14.9	16.1
South Outer (SO)	4.3%	3.8%	2.0	1.8
South Central (SC)	8.7%	8.0%	4.1	3.8
West Outer (WO)	2.4%	2.3%	1.1	1.1
West Central (WC)	21.5%	21.2%	10.1	9.9

At first glance, the numbers don't look too dissimilar (albeit East Central loses an entire councillor). But when looking at the 'artificial' elector rate vs 'real' resident rate, either side of the ring road, the total Outer vs Central count changes from 9.4 vs 37.6 to 10.2 vs 36.8 – i.e. from **9** vs 38 on residents to **10** vs 37 on electors.

At the moment, the count is approximately **11** outside the ring road\* vs 36 within, demonstrating how easy it is to end up with skewed results at a neighbourhood level.

*\* Osbaldwick and Derwent is circa 50:50, and other cross-ring-road wards make little difference.*

If we contrast the two worst wards for deprivation (Westfield and Clifton; Indices of Multiple Deprivation (IMD) scores of 27.32 and 23.93) vs the two best wards (Heworth Without and Copmanthorpe; IMD scores of 2.99 and 4.45), the more deprived wards have 4,807 residents per councillor and the less deprived wards only have 4,097 residents each.

That means, if every resident needed equal support, the two poorest wards need 17% more work than the two wealthiest wards.

But, frankly, they don't. Even ignoring the weight that parish councils can take off unitary authority councillors' shoulders, poorer residents need more work from councillors.

For instance, using CoYC Ward Profile data, where the poorer wards have **1.2x** the number of residents than the wealthier wards:

- The poorer wards have **5.1x** the number of children in poverty per councillor.
- The poorer wards have **14x** the number of Universal Credit claimants per councillor.
- The poorer wards have **2.2x** the number of PIP claimants per councillor.
- The poorer wards have **13x** the number of social tenants per councillor.
- The poorer wards have **25x** the number of council houses per councillor.
- The poorer wards have **4.6x** the number of crimes per councillor.
- The poorer wards have **4.7x** the amount of ASB per councillor.

- And the disparity is large in general, e.g. people live an average of 7.5 years longer in the less deprived wards than the more deprived wards, which means that there should be a disproportionate amount of support *in favour* of the poorer wards, not against them.

These numbers are a worrying indication of the gap between rich and poor in York. They're also an intimidating warning that there is significantly more work required for councillors to do a comparable job in poorer wards than wealthier ones.

What this ultimately means for York residents is simple. If you currently live in the richer, parished, outer areas of York, *on average* you will get an additional layer of democracy, you will get more councillors per person, you will experience significantly fewer issues, and your councillors will be handling less work at any given time.

Single-parent families in poverty require more support than a wealthy couple, yet they are counted as half the 'electors' in comparison. Some residents are even *prohibited* from being electors, despite higher-than-average levels of need. Poorer residents are far less likely to register to vote, and far more likely to regularly change their address. Yet, obviously, councillors do not turn away or ignore any non-electors that need help.

And the Council's report evidenced this huge gulf in the workload between different councillors.

As the government intends to greatly improve elector rates, the current 2031 elector estimates will under-represent low-turnout communities and urban areas. While the more accurate number will be the total estimate for residents above 16 years old, I am unable to find estimates for this number. It is more closely aligned with the maths of 9 councillors outside the ring road (to 38 within) than either the 10 from published elector estimates or 11 from current data.

These numbers are of course still skewed *within* those segmented areas, too. Heworth ward is on the lower end of electors and the higher end of deprivation, but Heworth Without is the other way around. Clifton and Rawcliffe have an arbitrary and outdated boundary through a shared community, but they have very different elector ratios and workloads.

I fully understand that elector numbers are a core part of the way that the LGBCE traditionally creates proposals, just like parish boundaries, but in a city like York with such a large gulf between rich and poor this can lead to unfair outcomes. Please consider using the resident numbers for calculations, at the very least attributing significant weight to these numbers and publishing these numbers as part of the initial proposals on 5<sup>th</sup> May to aid consultation.

## Conclusion

Without an even longer and more detailed analysis of the numerous metrics and ways of interpreting them, this document hopefully serves to demonstrate the serious threats that elector numbers and archaic boundaries pose to York residents and communities.

While both are important aspects of York's circumstances to consider, their limitations and the alternatives – resident numbers and strong modern boundaries – are also local circumstances that demonstrably meet resident needs better. They meet local needs more, they are more appropriate for the city, and they "reflect community ties and identities" better.

Thank you in advance for your scrutiny of these areas of concern.