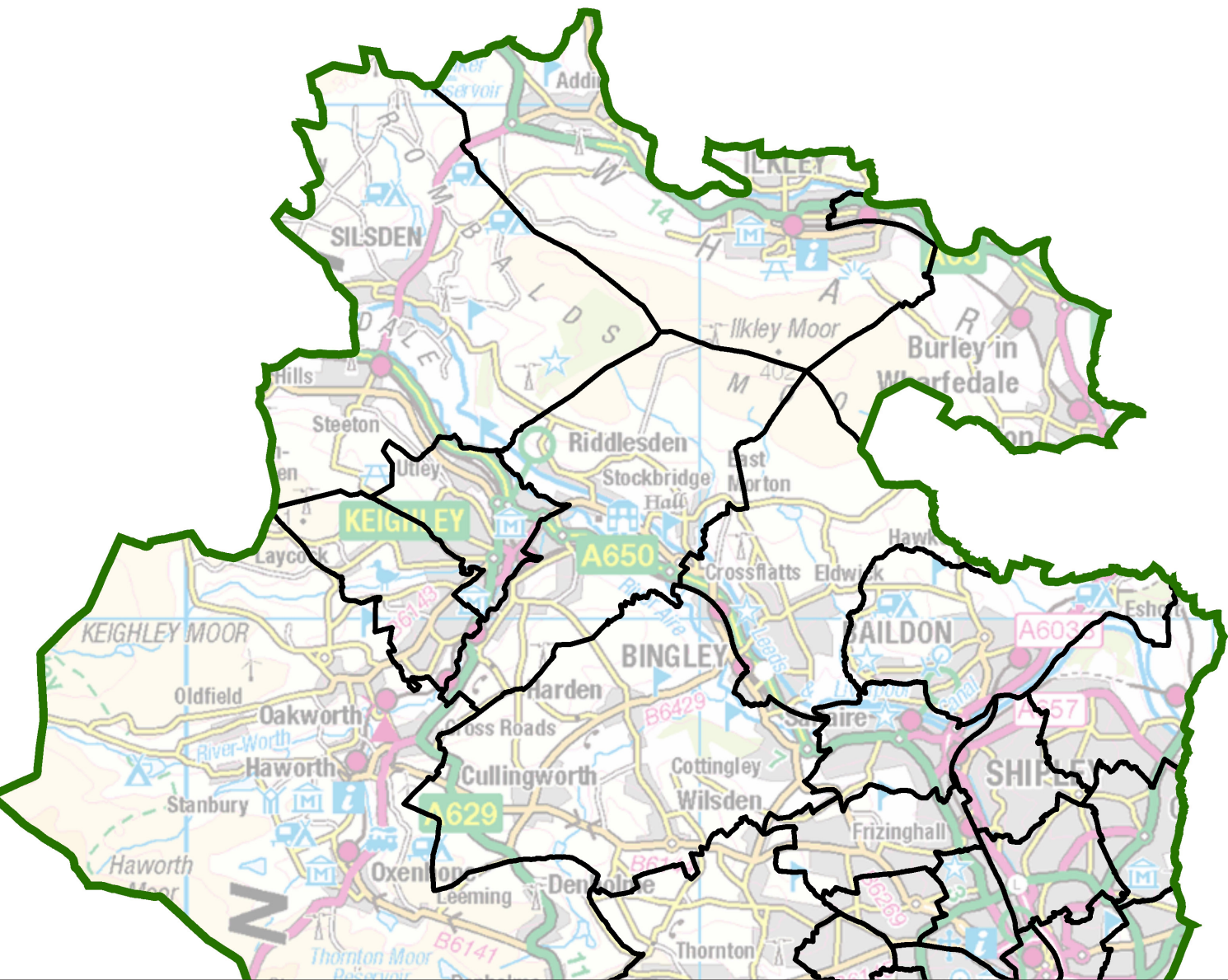


The  
Local Government  
Boundary Commission  
for England



# New electoral arrangements for Bradford Council Final Recommendations

December 2024

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# Final recommendations on the new electoral arrangements for City of Bradford Metropolitan District Council

Electoral review

December 2024

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# Introduction

## Who we are and what we do

1 The Local Government Boundary Commission for England (LGBCE) is an independent body set up by Parliament.<sup>1</sup> We are not part of government or any political party. We are accountable to Parliament through a committee of MPs chaired by the Speaker of the House of Commons. Our main role is to carry out electoral reviews of local authorities throughout England.

2 The members of the Commission are:

- Professor Colin Mellors OBE (Chair)
- Andrew Scallan CBE (Deputy Chair)
- Amanda Nobbs OBE
- Steve Robinson
- Wallace Sampson OBE
- Liz Treacy
- Ailsa Irvine (Chief Executive)

## What is an electoral review?

3 An electoral review examines and proposes new electoral arrangements for a local authority. A local authority's electoral arrangements decide:

- How many councillors are needed.
- How many wards or electoral divisions there should be, where their boundaries are and what they should be called.
- How many councillors should represent each ward or division.

4 When carrying out an electoral review the Commission has three main considerations:

- Improving electoral equality by equalising the number of electors that each councillor represents.
- Ensuring that the recommendations reflect community identity.
- Providing arrangements that support effective and convenient local government.

5 Our task is to strike the best balance between these three considerations when making our recommendations.

6 More details regarding the powers that we have, as well as further guidance and information about electoral reviews and the review process in general, can be found on our website at [www.lgbce.org.uk](http://www.lgbce.org.uk)

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<sup>1</sup> Under the Local Democracy, Economic Development and Construction Act 2009.



## Why Bradford?

7 We are conducting a review of the City of Bradford Metropolitan District Council ('the Council') as its last review was completed in 2003, and we are required to review the electoral arrangements of every council in England 'from time to time'.<sup>2</sup> Additionally, some councillors currently represent many more or fewer electors than others. We describe this as 'electoral inequality'. Our aim is to create 'electoral equality', where the number of electors per councillor is as even as possible, ideally within 10% of being exactly equal.

8 This electoral review is being carried out to ensure that:

- The wards in Bradford are in the best possible places to help the Council carry out its responsibilities effectively.
- The number of electors represented by each councillor is approximately the same across the district.

## Our proposals for Bradford

9 Bradford should be represented by 90 councillors, the same number as there are now.

10 Bradford should have 30 wards, the same number as there are now.

11 The boundaries of 20 wards should change; 10 will stay the same.

12 We have now finalised our recommendations for electoral arrangements for Bradford.

## How will the recommendations affect you?

13 The recommendations will determine how many councillors will serve on the Council. They will also decide which ward you vote in, which other communities are in that ward, and, in some cases, which parish council ward you vote in. Your ward name may also change.

14 Our recommendations cannot affect the external boundaries of the district or result in changes to postcodes. They do not take into account parliamentary constituency boundaries. The recommendations will not have an effect on local taxes, house prices, or car and house insurance premiums and we are not able to take into account any representations which are based on these issues.

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<sup>2</sup> Local Democracy, Economic Development & Construction Act 2009 paragraph 56(1).

## Review timetable

15 We wrote to the Council to ask its views on the appropriate number of councillors for Bradford. We then held three periods of consultation with the public on warding patterns for the district. The submissions received during consultation have informed our final recommendations.

16 The review was conducted as follows:

Stage starts	Description
20 June 2023	Number of councillors decided
27 June 2023	Start of consultation seeking views on new wards.
4 September 2023	End of consultation; we began analysing submissions and forming draft recommendations
28 November 2023	Publication of draft recommendations; start of second consultation
5 February 2024	End of consultation; we began analysing submissions and forming final recommendations
9 July 2024	Publication of further draft recommendations for two areas of the district
19 August 2024	End of consultation; we began analysing submissions and forming final recommendations
3 December 2024	Publication of final recommendations



## Analysis and final recommendations

17 Legislation<sup>3</sup> states that our recommendations should not be based only on how many electors<sup>4</sup> there are now, but also on how many there are likely to be in the five years after the publication of our final recommendations. We must also try to recommend strong, clearly identifiable boundaries for our wards.

18 In reality, we are unlikely to be able to create wards with exactly the same number of electors in each; we have to be flexible. However, we try to keep the number of electors represented by each councillor as close to the average for the council as possible.

19 We work out the average number of electors per councillor for each individual local authority by dividing the electorate by the number of councillors, as shown on the table below.

	2023	2029
Electorate of Bradford	370,124	393,754
Number of councillors	90	90
Average number of electors per councillor	4,112	4,375

20 When the number of electors per councillor in a ward is within 10% of the average for the authority, we refer to the ward as having 'good electoral equality'. All but one of our proposed wards (Bingley East) for Bradford are forecast to have good electoral equality by 2029.

## Submissions received

21 See Appendix C for details of the submissions received. All submissions may be viewed on our website at [www.lgbce.org.uk](http://www.lgbce.org.uk)

## Electorate figures

22 The Council submitted electorate forecasts for 2029, a period five years on from the scheduled publication of our final recommendations in 2024. These forecasts were broken down to polling district level and predicted an increase in the electorate of around 6%.

23 We considered the information provided by the Council and are satisfied that the projected figures are the best available at the present time. We have used these figures to produce our final recommendations.

<sup>3</sup> Schedule 2 to the Local Democracy, Economic Development and Construction Act 2009.

<sup>4</sup> Electors refers to the number of people registered to vote, not the whole adult population.

## Number of councillors

24 City of Bradford Metropolitan District Council currently has 90 councillors. We have looked at evidence provided by the Council and have concluded that keeping this number the same will ensure the Council can carry out its roles and responsibilities effectively.

25 We therefore invited proposals for new patterns of wards that would be represented by 90 councillors: for example, 30 three-councillor wards.

26 As the Council elects by thirds (meaning it has elections in three out of every four years) there is a presumption in legislation<sup>5</sup> that the Council have a uniform pattern of three-councillor wards. In each review of local authorities that elect by thirds, we will aim to deliver a pattern of three-member wards. However, in all cases, this consideration will not take precedence over our other statutory criteria, and we will not recommend uniform patterns in the number of councillors per ward or division if, in our view or as is shown in evidence provided to us, it is not compatible with our other statutory criteria.

27 We received no further submissions about the number of councillors in response to our consultations on our draft and further draft recommendations. We have therefore maintained 90 councillors for our final recommendations.

## Ward boundaries consultation

28 We received 156 submissions in response to our consultation on ward boundaries. These included district-wide proposals from the Council's Labour Group ('the Labour Group'), the Council's Conservative Group ('the Conservatives') and the Council's Green Group ('the Greens').

29 Of the remaining submissions, 78 referred solely to a proposal from the Members of Parliament, Sir Philip Davies MP (Shipley) and Robbie Moore MP (Keighley & Ilkley), to create a new local authority for the satellite towns that surround Bradford. We considered these submissions, but the creation of a new authority is not within the purview of this review. This review is solely concerned with the internal ward boundaries of Bradford and cannot make any changes to the external boundary of the authority.

30 A number of other submissions referred to the creation of a new authority but also discussed existing ward boundaries within Bradford. These were considered as part of this review. The remainder of the submissions provided localised comments for warding arrangements in particular areas of the district.

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<sup>5</sup> Schedule 2 to the Local Democracy, Economic Development & Construction Act 2009 paragraph 2(3)(d) and paragraph 2(5)(c).

31 The three district-wide schemes all provided a uniform pattern of three-councillor wards for Bradford. We carefully considered the proposals received and were of the view that the proposed patterns of wards resulted in good levels of electoral equality in most areas of the authority and generally used clearly identifiable boundaries.

32 The three district-wide schemes all provided a uniform pattern of three-councillor wards for Bradford. We carefully considered the proposals received and were of the view that the proposed patterns of wards resulted in good levels of electoral equality in most areas of the authority and generally used clearly identifiable boundaries.

33 Our draft recommendations were predominately based on the submission from the Labour Group, except in the Allerton, Clayton, Fairweather Green and Thornton areas, where we adopted a proposal by the Conservatives. We also based our recommendations on the three district-wide schemes where there was agreement between them all.

34 In addition, we took into account local evidence that we received, which provided further evidence of community links and locally recognised boundaries. In some areas, we considered that the proposals did not provide the best balance between our statutory criteria and so we identified alternative boundaries.

35 We conducted a virtual tour of the area in order to look at the various proposals on the ground. This tour of Bradford helped us to decide between the different boundaries proposed.

36 Our draft recommendations were for 30 three-councillor wards. We considered that our draft recommendations would provide for good electoral equality while reflecting community identities and interests where we received such evidence during consultation.

## Draft recommendations consultation

37 We received 191 submissions in response to our consultation on our draft recommendations. These included three district-wide responses from the Conservatives, the Greens and the Labour Group. The submission from the Greens contained a counter proposal for wards to the south of the city centre. The submissions from the Labour Group and the Conservatives contained comments about wards across the city.

38 Many of these submissions were related to our draft recommendations for the area of Eldwick in Bingley parish. These included a counter proposal for Baildon, Bingley and Shipley from Baildon Town Council, as well as comments from Bingley

Town Council, local organisations and local residents across this part of the authority.

39 The remainder of the submissions provided localised comments for warding arrangements in other parts of the district.

40 As a result of the evidence we received in this consultation, we decided to hold a round of further limited consultation in the areas of Baildon, Bingley and Shipley and for the wards to the southwest and southeast of the city centre.

## Further draft recommendations

41 We received 400 submissions in response to our further draft recommendations including separate responses from the Conservative and Queensbury Independent Group, the Green Group and the Labour Group on Bradford Council. We also received responses from Anna Dixon MP, five Bradford Council councillors, 12 parish and town councils and their representatives, six local organisations and 373 local residents. Of the 400 submissions, the responses from the groups on the Council covered both areas we reconsulted on, whilst 11 focused on the revised proposals to the southwest and southeast of the city centre and 386 focussed on the proposals in the Baildon, Bingley and Shipley area.

## Final recommendations

42 Our final recommendations are for 30 three-councillor wards. We consider that our final recommendations will provide for good electoral equality while reflecting community identities and interests where we received such evidence during consultation.

43 Our final recommendations are based on the draft and further recommendations with modifications to the wards in the Allerton, Clayton, Fairweather Green and Thornton areas. We also propose minor changes to the boundaries of Bolton & Undercliffe, City, Eccleshill and Manningham wards, based on the submissions received.

44 We also propose to make modifications in the south of the city where we propose to adopt the further draft recommendations as our final recommendations, subject to one small modification and a name change.

45 We propose to make some amendments to both our draft recommendations and further draft recommendations in the Baildon, Bingley and Shipley area to provide a warding pattern we consider best balances the three statutory criteria detailed below.

46 The tables and maps on pages 10–30 detail our final recommendations for each area of Bradford. They detail how the proposed warding arrangements reflect the three statutory<sup>6</sup> criteria of:

- Equality of representation.
- Reflecting community interests and identities.
- Providing for effective and convenient local government.

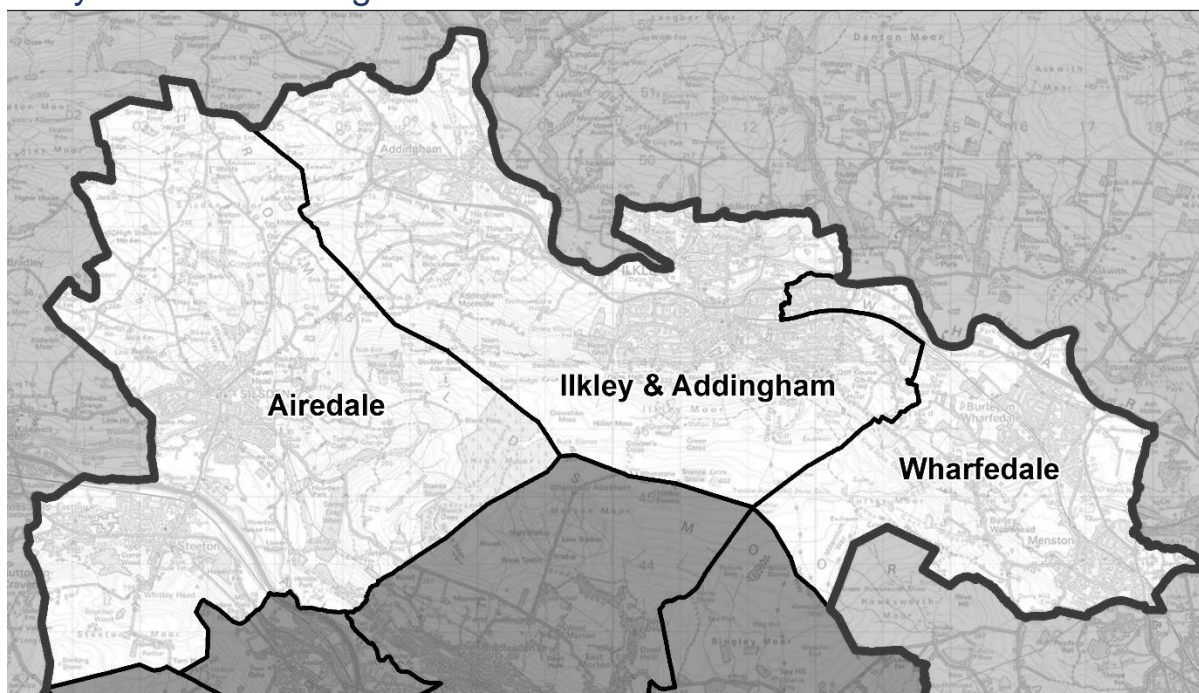
47 A summary of our proposed new wards is set out in the table starting on page 37 and the large map accompanying this report.

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<sup>6</sup> Local Democracy, Economic Development and Construction Act 2009.



## Ilkley and surrounding area



Ward name	Number of councillors	Variance 2029
Airedale	3	-10%
Ilkley & Addingham	3	5%
Wharfedale	3	2%

### *Airedale, Ilkley & Addingham and Wharfedale*

48 Our draft recommendations for these three wards included an area of Ilkley, namely the area to the north of Ben Rhydding station, into Wharfedale ward to provide for electoral equality. We also included Addingham parish in our proposed Ilkley & Addingham ward, based on the evidence we had received.

49 In response to our draft recommendations, we received around 25 submissions that related to these three wards. The Labour Group, the Greens and the Labour Party's Prospective Parliamentary Candidate for the Keighley & Ilkley constituency supported the draft recommendations. The Conservatives reiterated their support for their previous proposal to include the Eldwick area of Bingley parish in Wharfedale ward.

50 Ilkley Town Council did not support the draft recommendations, particularly the inclusion of part of Ben Rhydding in Wharfedale ward. They did not propose any alternative boundaries, but did suggest Wharfedale could be left unchanged and that the forecast variance of -14% be accepted. Councillors Loy and Nunns, both of whom represent Ilkley ward, also objected to the proposals for Ilkley, mentioning their support for either the alternative proposals the Conservatives made, or leaving the current wards unchanged and accepting the forecast electoral inequality.

51 Six local residents supported the proposal to include part of Ben Rhydding in Wharfedale ward, while eight local residents were opposed. One local resident was opposed to the alternative proposal to include part of Eldwick in Wharfedale ward. Four local residents objected, and four local residents supported the inclusion of Addingham in Ilkley ward. None of the submissions proposed a warding pattern that would resolve the -14% variance that would result in retaining the existing Wharfedale ward.

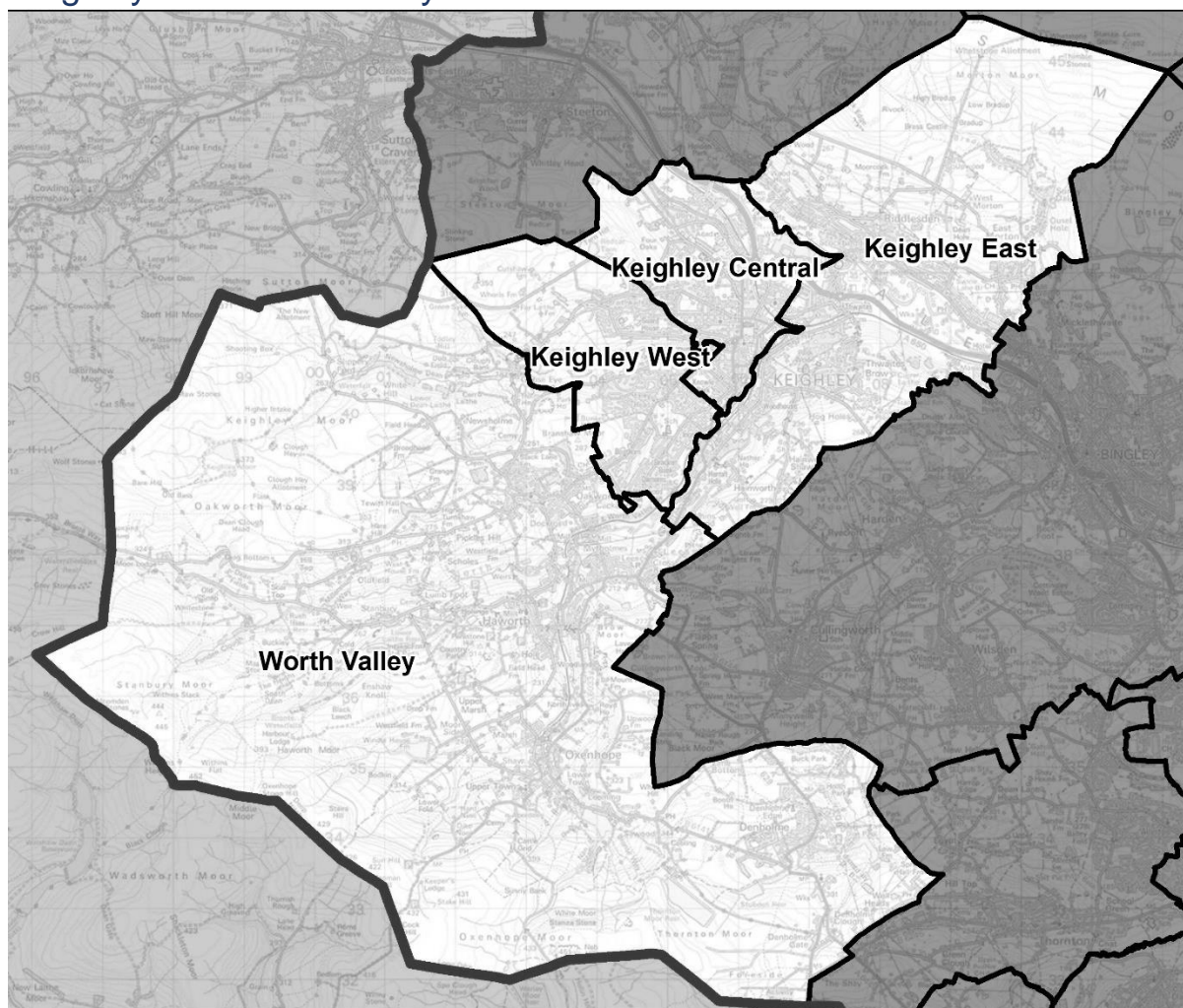
52 Steeton with Eastburn Parish Council suggested that Silsden & Streeton ward should be named Airedale, as our proposed name excluded the community of Eastburn.

53 Having considered these submissions, as well as the previous proposals made to us, we propose to make no changes to the boundaries of these three wards. We do, however, propose to adopt the name change from Silsden & Steeton to Airedale, as suggested by Steeton with Eastburn Parish Council.

54 We consider that the measured support we received concerning our recommendations, the absence of any alternative proposals, and the lack of strong and compelling evidence to support a Wharfedale ward with 14% fewer electors than the average for Bradford by 2029, means that the best balance of our statutory criteria is provided by confirming our draft recommendations as final, subject to the name change mentioned above.

55 Our final proposals for this area are for three three-councillor wards of Airedale, Ilkley & Addingham and Wharfedale. These three wards will have electoral variances of -10%, 5% and 2% by 2029, respectively.

## Keighley and Worth Valley



Ward name	Number of councillors	Variance 2029
Keighley Central	3	-2%
Keighley East	3	-1%
Keighley West	3	-6%
Worth Valley	3	10%

### *Keighley Central, Keighley East, Keighley West and Worth Valley*

56 Our draft recommendations for Keighley were for three wards of Keighley Central, Keighley East and Keighley West. These were identical to the existing wards, except for a very minor change in the Goose Eye area. Our proposal for Worth Valley ward was the addition of Denholme parish, which allowed for electoral equality in the Bingley Rural area.

57 The Labour Group, the Greens and the Labour Party's Prospective Parliamentary Candidate for Keighley & Ilkley constituency fully supported the draft recommendations. Keighley Town Council supported the change in the Goose Eye area, along with supporting all three proposed Keighley wards. They also noted our

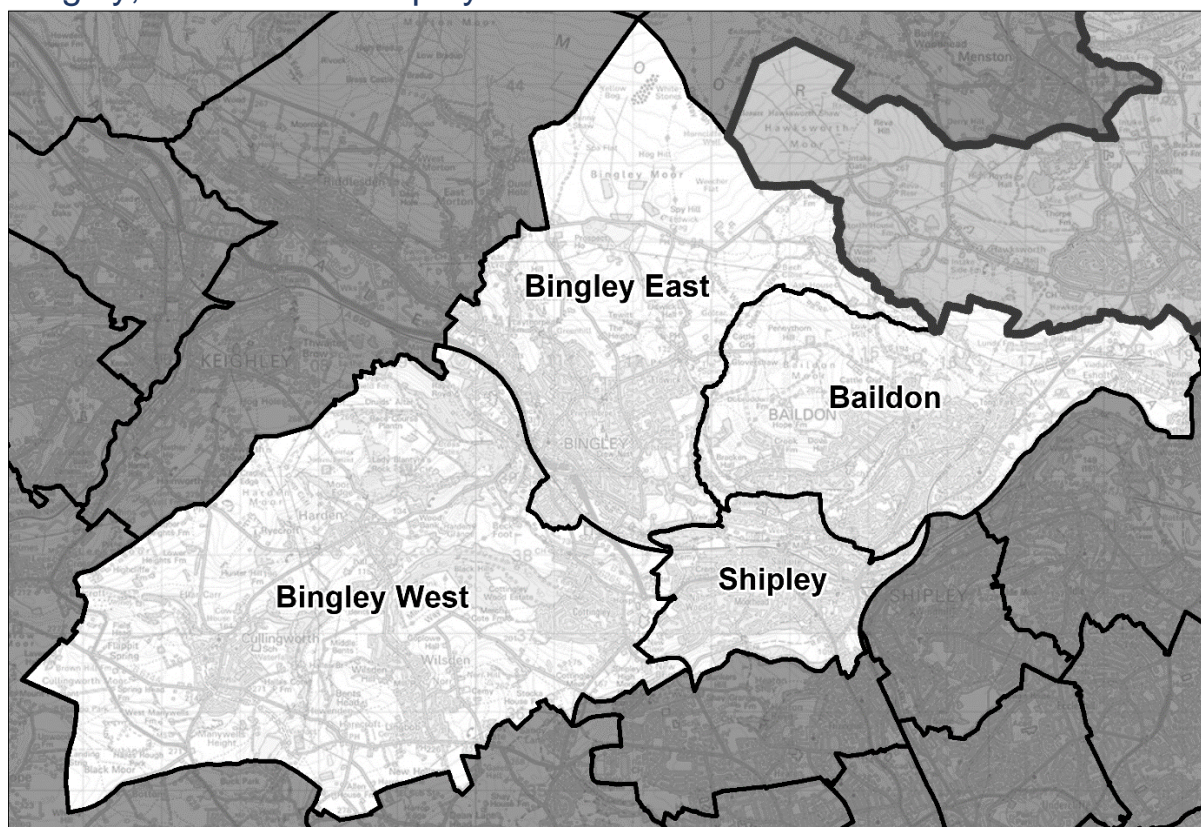
proposal to add Denholme parish to Worth Valley ward and stated that whilst this created an even larger ward than the current ward, they had no concerns about the inclusion of the parish. Two Keighley Town Council councillors supported the inclusion of the Goose Eye area in Worth Valley ward but objected to the inclusion of Denholme parish.

58 The Conservatives also opposed the inclusion of Denholme parish in Worth Valley ward and again suggested its alternative proposal to include Bogthorn and Laycock in Worth Valley ward. Oakworth Village Society, Oxenhope Village Council, Worth Valley Labour Party and seven local residents who all live in the existing Worth Valley ward also objected to the inclusion of Denholme parish, stating a lack of shared community identities and interests. Conversely, two local residents from Denholme parish supported its inclusion in Worth Valley ward. Other than the Conservatives, none of the other submissions that objected to the inclusion of Denholme parish in Worth Valley ward suggested an alternative warding pattern that could accommodate Denholme parish in a Bingley-centric ward and provide for electoral equality.

59 Given the support for the proposals from two of the political groups on the Council, as well as Keighley Town Council, and the lack of any alternative proposals for Worth Valley ward that would, in our view, better reflect our statutory criteria, we consider it appropriate to confirm the draft recommendations for these four wards as final.

60 Our final recommendations are for four three-councillor wards of Keighley Central, Keighley East, Keighley West and Worth Valley, which will have electoral variances of -2%, -1%, -6% and 10% by 2029, respectively.

## Bingley, Baildon and Shipley



Ward name	Number of councillors	Variance 2029
Baildon	3	-1%
Bingley East	3	14%
Bingley West	3	1%
Shipley	3	-3%

### *Baildon, Bingley East, Bingley West and Shipley*

61 Our draft recommendations for this area transferred the settlement of Eldwick from Bingley ward to a proposed Baildon & Eldwick ward. This proposal allowed us to achieve electoral equality for both wards, as the existing Bingley ward is forecast to have 20% more electors than the average for the district by 2029.

62 In addition, we had recommended a Bingley Rural ward that moved Denholme parish into Worth Valley ward and used the River Aire as the boundary between Bingley ward and Bingley Rural ward. Our proposed Shipley ward followed the boundaries of the existing Shipley ward, except for a small amendment to provide a more identifiable boundary with our Baildon & Eldwick ward along Green Lane. This proposal meant that the part of Baildon parish currently in a Shipley ward remained in a Shipley ward.

63 In response, we received a great deal of community-based evidence demonstrating the strong ties that the Eldwick area has with the wider Bingley area.

These submissions stated that there is a lack of community ties between Eldwick and Baildon, including the lack of any public transport over Baildon Moor along Bingley Road.

64 As a result, we proposed further draft recommendations for the area, consisting of four three-councillor wards: Baildon, Bingley East, Bingley West and Shipley.

65 Our proposed Baildon ward contained all of Baildon parish as well as the unparished area of Esholt. We proposed Bingley East and Bingley West wards with the railway line through the town forming the boundary between the wards. We proposed to include part of Cottingley village in Bingley West ward, with the remainder of the village included in our proposed Shipley ward.

66 In response to our consultation on these further draft recommendations, we received 391 submissions that made direct reference to at least one of these four wards.

67 The Labour Group reiterated their support for a ward that included Eldwick in a ward with Baildon and proposed a slightly revised boundary. Southway, Moor Croft and Stone Hill would be included in Baildon & Eldwick ward, with Warren Lane forming the boundary between Baildon & Eldwick and Bingley wards. They stated that adopting the further draft recommendations would fracture community identities in Bingley and Cottingley. They also opposed the inclusion of the part of Baildon parish that is currently in Shipley ward moving to a Baildon ward, on the basis that it would divide the Saltaire World Heritage Site (WHS) between wards.

68 The Green Group also supported retaining all of the Saltaire WHS in an unchanged Shipley ward. In addition, they also considered that including Eldwick in a Baildon ward was preferable to dividing Bingley and Cottingley. The Conservative and Queensbury Independent Group broadly supported the proposals for Baildon, Bingley East and Bingley West wards as proposed in our further draft recommendations. Anna Dixon, the MP for Shipley, wrote in support of the initial draft proposals.

69 Councillors Dearden, Fricker and Wheatley, the current councillors for Bingley ward, made a joint submission in opposition to the further draft recommendations. Councillor Wheatley also submitted a petition signed by 229 people objecting to the further draft recommendations and in support of the Labour Group's suggested amendments.

70 Councillors Sullivan and Winnard, two of the current councillors for Bingley Rural ward, expressed support for the further draft recommendations. They stated that given the community ties between Eldwick and Gilstead with Bingley, dividing Bingley was necessary to ensure electoral equality, and the proposed boundary along the railway line accomplished this. Both councillors also suggested that a small

amendment could be made to the Bingley West boundary to move 39 properties on Lee Lane from Bingley East ward to Bingley West ward. Wilsden Parish Council also wrote in support of this proposed change, albeit in the context of opposing the further draft recommendations more broadly.

71 Councillors Love, Warnes and Watson, the current councillors for Shipley ward, made a joint submission in support of the initial draft recommendations – particularly the proposal for Shipley ward to remain unchanged. They objected to the further draft recommendation proposal to transfer the part of Baildon parish along Coach Road, Higher Coach Road and Thompson Avenue from Shipley ward to Baildon ward. They expressed a preference for an unchanged Shipley ward, even if it meant Eldwick being included in a Baildon ward, acknowledging that this proposal had faced opposition. Councillor Parkinson of Shipley Town Council wrote in support of this submission.

72 Baildon Town Council, Councillor Foster and Councillor Turner wrote in support of the further draft recommendations. In contrast, Bingley Town Council opposed the division of Bingley, arguing that following the railway line would harm community ties in the town centre and undermine effective local governance. They proposed that Bingley Rural ward retain its current boundaries and that Bingley ward be represented by four councillors, rather than the current three, to ensure electoral equality. Councillor Clough and Councillor Goode of Bingley Town Council also wrote in opposition to the division of Cottingley under the further draft recommendations. Councillors Heseltine and Truelove, also of Bingley Town Council, made a joint objection to the inclusion of Eldwick in Baildon ward, as proposed under the draft recommendations, citing over 50 emails they had received opposing this proposal. Cottingley Community Centre also objected to the division of Cottingley between wards.

73 A total of 175 submissions from local residents in Eldwick also continued to oppose the possible inclusion of the area in a Baildon ward. These submissions provided additional evidence regarding the strong community ties between Eldwick, Gilstead and Bingley. We also received 121 local resident submissions objecting to our proposal to divide Bingley along the main railway line. These submissions gave evidence of the community ties in Bingley town centre and the Myrtle Park area. We received 75 submissions from local residents in Cottingley that opposed any division of the village between Bingley and Shipley wards, presenting strong evidence of the community ties in the village which would be broken by the inclusion of the southern part of the village in Shipley ward. Additionally, nine submissions from local residents supported moving the part of Baildon parish currently in Shipley ward back into Baildon ward, whereas six local residents advocated for its continued inclusion in Shipley ward.

74 Having considered all the submissions made during the three consultation periods, we conducted a detailed tour of the area to help us assess the various

proposals and options. We looked at the road connecting Eldwick to Baildon parish as cited in many of the submissions we received. We concur with the view that this road, being the only link between the two areas, combined with the lack of connecting public transport, suggests a lack of strong community ties between Eldwick and Baildon.

75 We also visited Cottingley to assess our proposed boundary in the village. Whilst we were careful to ensure that the boundary we had proposed did not divide any streets between wards, we found the concerns raised in submissions – that our proposal broke community ties – to be valid. We determined that dividing Cottingley should be avoided if possible. This tour proved invaluable in confirming that it was unsuitable to include Eldwick in a Baildon ward, and to divide Cottingley between wards.

76 It is clear that throughout three rounds of consultation, we have received substantial feedback on this area, with both support and opposition to our draft and further draft recommendations. This has made balancing the statutory criteria challenging. However, we consider that our final recommendations for these four wards reflect a well-balanced consideration of the submissions we received.

77 Our final recommendations for Baildon ward and Shipley ward are two three-councillor wards that are very similar to the existing wards.

78 We propose that the boundary between Baildon and Shipley wards run along Green Lane, so that Lower Green and Milner Road are included in Baildon ward, rather than Shipley ward as at present. We propose that the remaining portion of Baildon parish currently in Shipley ward remain in Shipley ward. In our further draft recommendations, we suggested that this area along Coach Road, Higher Coach Road and Thompson Avenue be included in Baildon ward. We received some support for this proposal, but we also received significant opposition that stated that this proposal to divide the Saltaire WHS between wards would not provide for effective and convenient local government.

79 We observed that by keeping this area in an unchanged Shipley ward, we can avoid the division of Cottingley between Bingley West and Shipley wards, and we can prevent including any part of Eldwick in a Baildon ward, while achieving electoral equality across wards. Considering the strong evidence we had received against both of these proposals, we concluded that the best balance of our statutory criteria would be to maintain the existing boundary between Baildon and Shipley wards, with the exception of the small change to Lower Green and Milner Road.

80 Our final recommendations for Bingley are for two three-councillors wards of Bingley East and Bingley West. While we acknowledge the opposition to any division of Bingley in the submissions we received, we note that Bingley parish is currently split between Bingley and Bingley Rural wards. Additionally, there was a suggestion



to allocate four councillors in a single Bingley ward. However, as a matter of policy, the Commission does not recommend wards of more than three councillors, as we consider that this dilutes democratic accountability.

81 We recognise that the existing Bingley and Bingley Rural wards are both well supported. However, these arrangements result in poor levels of electoral equality, with deviations of 14% and 20% more electors than the average for Bradford by 2029. We therefore explored alternative ways we could provide two three-councillor wards covering Bingley and its rural hinterland, while ensuring an effective balance of statutory criteria.

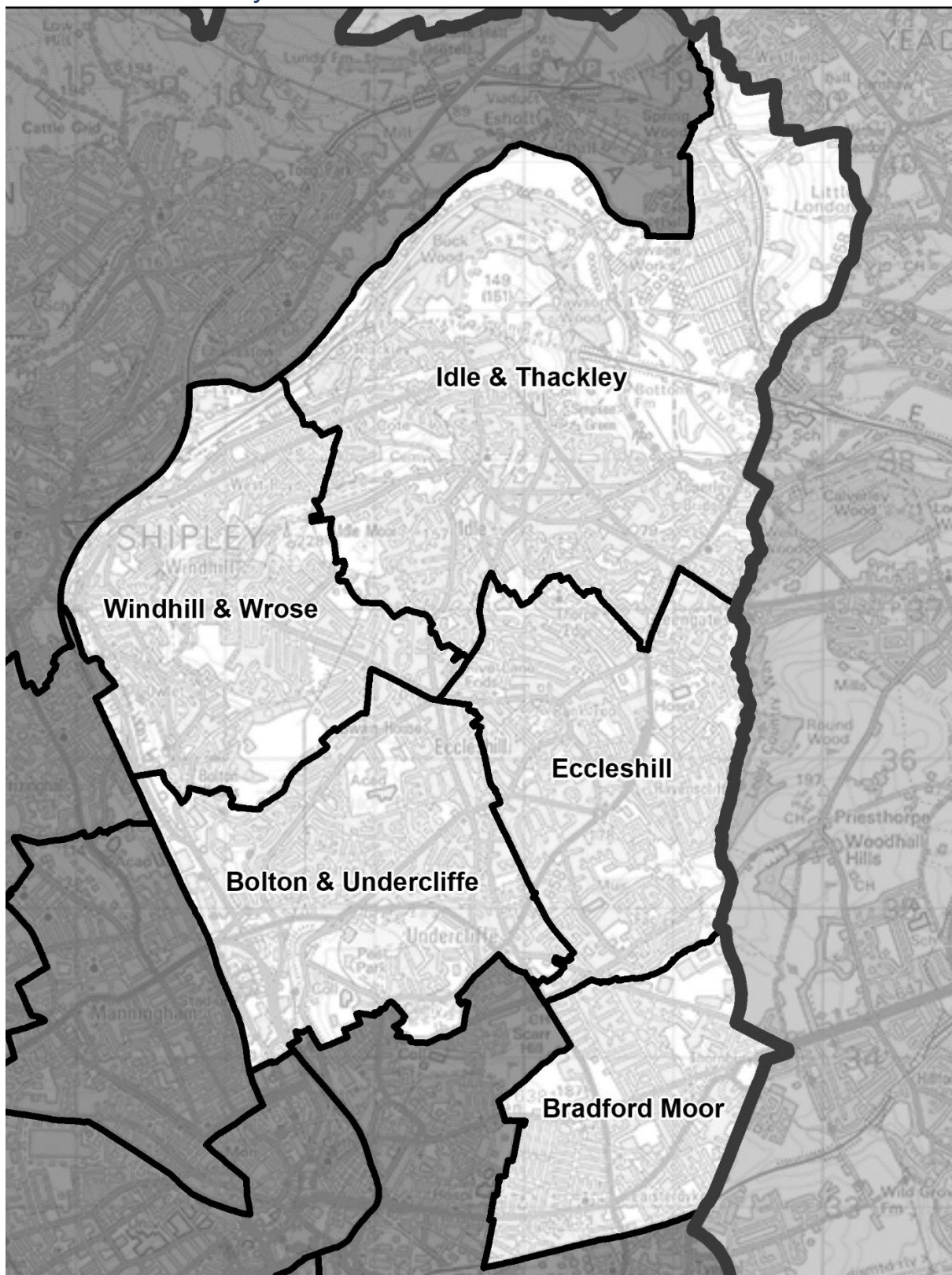
82 Our final recommendations reflect feedback received in submissions that the railway line is not a suitable boundary between Bingley East and Bingley West wards. After visiting the town, we were persuaded by this view, noting that the railway line and the A650 dual carriageway are situated in cuttings and do not form significant barriers. Consequently, our further draft recommendations risked disrupting community ties in the town centre and Myrtle Park areas. We also concluded that the B6265 Bradford Road would not make a suitable boundary. Therefore, we propose that the boundary between Bingley East and Bingley West wards run along the railway line, with the exception of the area around Leonard Street and Myrtle Avenue, to ensure that the Myrtle Park area is not divided across wards. While this proposal results in an electoral variance of 14% more electors in Bingley East ward than the average for Bradford by 2029, we are satisfied that this proposal best reflects the community identities in this area, and that such a variance can be justified on this basis.

83 Our Bingley West ward contains all of Cottingley village, as well as the parishes of Cullingworth, Harden and Wilsden.

84 We looked at the issue of the properties on Lee Lane that were raised in several submissions. These electors live in properties that lie right along the parish boundary between Bingley and Wilsden parishes and, under our final recommendations, are included in Bingley West ward instead of Shipley ward, as per our further draft recommendations. However, we are unable to make changes to parish boundaries as part of this review. They can only be changed by Bradford Council through a Community Governance Review.

85 Our final recommendations for this area are for four three-councillors wards of Baildon, Bingley East, Bingley West and Shipley, which will have electoral variances of -1%, 14%, 1% and -3% by 2029, respectively.

Northeast of the city centre



Ward name	Number of councillors	Variance 2029
Bolton & Undercliffe	3	-5%

Bradford Moor	3	2%
Eccleshill	3	7%
Idle & Thackley	3	8%
Windhill & Wrose	3	-9%

*Bolton & Undercliffe, Bradford Moor, Eccleshill, Idle & Thackley and Windhill & Wrose*

86 Our draft recommendations for these five wards were unchanged from the existing wards save for a small amendment to the boundary between the Idle & Thackley and Baildon wards.

87 In response to our draft recommendations, the Labour Group only commented on Windhill & Wrose ward, agreeing that leaving this ward unchanged was best for those communities. The Greens supported all five wards in their response.

88 We also received two further comments from local residents. One was supportive of Bolton & Undercliffe ward, and the other submission proposed some minor changes to the boundaries of Bolton & Undercliffe ward where it borders, firstly, Bowling & Barkerend ward and, secondly, Eccleshill ward.

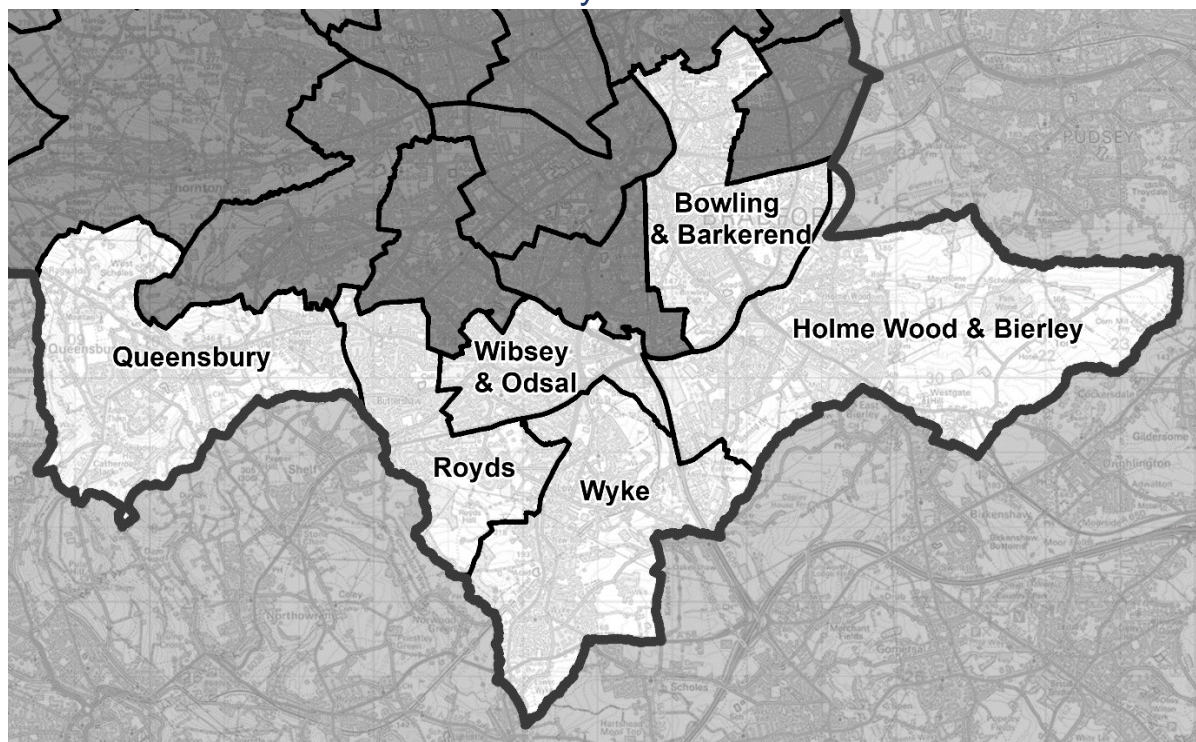
89 The current boundary between Bolton & Undercliffe ward and Bowling & Barkerend ward runs in front of numbers 171-185 Sunnyside Lane and then down the middle of Airedale Road. The local resident suggested following the rear of 171-185 Sunnyside Lane and the rear of the south side of Airedale Road, so that the former properties would be wholly in Bowling & Barkerend ward and the latter properties in Bolton & Undercliffe ward. This would mean that neither road would be divided between wards. In addition, the local resident stated that Primary Way, which has been built since the last review, would be better placed in Bowling & Barkerend ward, to reflect the community identity of those electors.

90 In addition, the local resident proposed that a minor amendment be made to the boundary between Bolton & Undercliffe and Eccleshill wards to include all of Norman Avenue and Norman Mount in Bolton & Undercliffe ward, given that Norman Grove and Norman Crescent are already wholly in Bolton & Undercliffe ward. The local resident stated that this minor change would enhance community ties.

91 We propose to adopt these minor changes, which we agree reflect community ties. We also consider that, in this case, placing whole streets together in the same ward will aid effective and convenient local government. Other than these minor changes, we confirm the draft recommendations for these wards as final.

92 Our proposed final recommendations are for five three-councillor wards of Bolton & Undercliffe, Bradford Moor, Eccleshill, Idle & Thackley and Windhill & Wrose with electoral variances of -5%, 2%, 7%, 8% and -9% by 2029, respectively.

## Southeast and southwest of the city centre



Ward name	Number of councillors	Variance 2029
Bowling & Barkerend	3	10%
Holme Wood & Bierley	3	1%
Queensbury	3	-9%
Royds	3	-8%
Wibsey & Odsal	3	-7%
Wyke	3	-8%

### *Bowling & Barkerend, Holme Wood & Bierley, Queensbury, Royds, Wibsey & Odsal and Wyke*

93 Our draft recommendations in the south of the city were opposed in several submissions, as they created a ward that contained part of Bierley community with the community of Wyke, which lies on the other side of the M606. Having considered those submissions, we proposed a set of further draft recommendations for these six wards based on an alternative proposal received from the Greens. These proposed set of wards did not cross the M606.

94 In response to the consultation on our further draft recommendations, we received 11 submissions that referred to either some, or all, of these proposed wards.

95 The Greens were in favour of the further draft recommendations. The Conservatives did not support the further draft recommendations. They stated that their initial proposals were better than the further draft recommendations, as they

contained more wards with variances closer to 0% than the further draft recommendations.

96 The Labour Group also opposed the further draft recommendations, citing the poorer levels of electoral equality compared to the draft recommendations. They also opposed the Bowling & Barkerend ward, as it did not align with the parliamentary constituency boundary in the area. In addition, they reaffirmed their support for the Wyke & Bierley Woods ward that was proposed at the draft recommendation stage, which was based on their warding pattern submission. They stated that Staithgate Lane provided access between the two wards and highlighted that other wards in the authority crossed major roads, with some areas, like Tyersal, having no internal access to the rest of the ward it is part of. The Labour Group also suggested renaming Tong Street ward to Holme Wood & Bierley, as this name better represented the main settlements in the ward. They also stated that Lower Woodlands should be included in a ward with Wyke, given its strong ties to that area and its close geographical proximity.

97 Councillor Edwards, one of the current councillors for Tong ward, supported the further draft recommendations. Councillor Edwards also argued that the Labour Group's argument for the inclusion of the Laisterdyke/Swaine Green area in Tong ward to reflect the constituency boundary lacked community-based reasoning.

98 Oakenshaw Residents' Association requested that all Bradford residents of Oakenshaw be placed in Wyke ward. They expressed concern that the village is already divided between Bradford and the neighbouring authority of Kirklees, and using the M606 motorway as a boundary would split the village between two Bradford Council wards and one Kirklees Council ward.

99 After reviewing the submissions and visiting the area during our tour of Bradford, we propose to adopt the further draft recommendations as final for this area, with minor adjustments in the Lower Woodlands area, and a change of name from Tong Street ward to Holme Wood & Bierley ward.

100 We note the objections from the Conservative and Queensbury Independent Group and the Labour Group with regards to the further draft recommendations offering poorer electoral equality compared to their own proposals or the draft recommendations. However, the Commission views electoral equality as one of three equally weighted statutory criteria. We will propose wards that have electoral variances further from the average if we find that evidence of community identity or effective and convenient local government to be compelling.

101 We also weighed the evidence regarding effective and convenient local government and the alignment of the parliamentary constituency boundary in the Laisterdyke/Swaine Green area against the evidence of the community identity of electors in this area. We concluded that no further compelling evidence had been

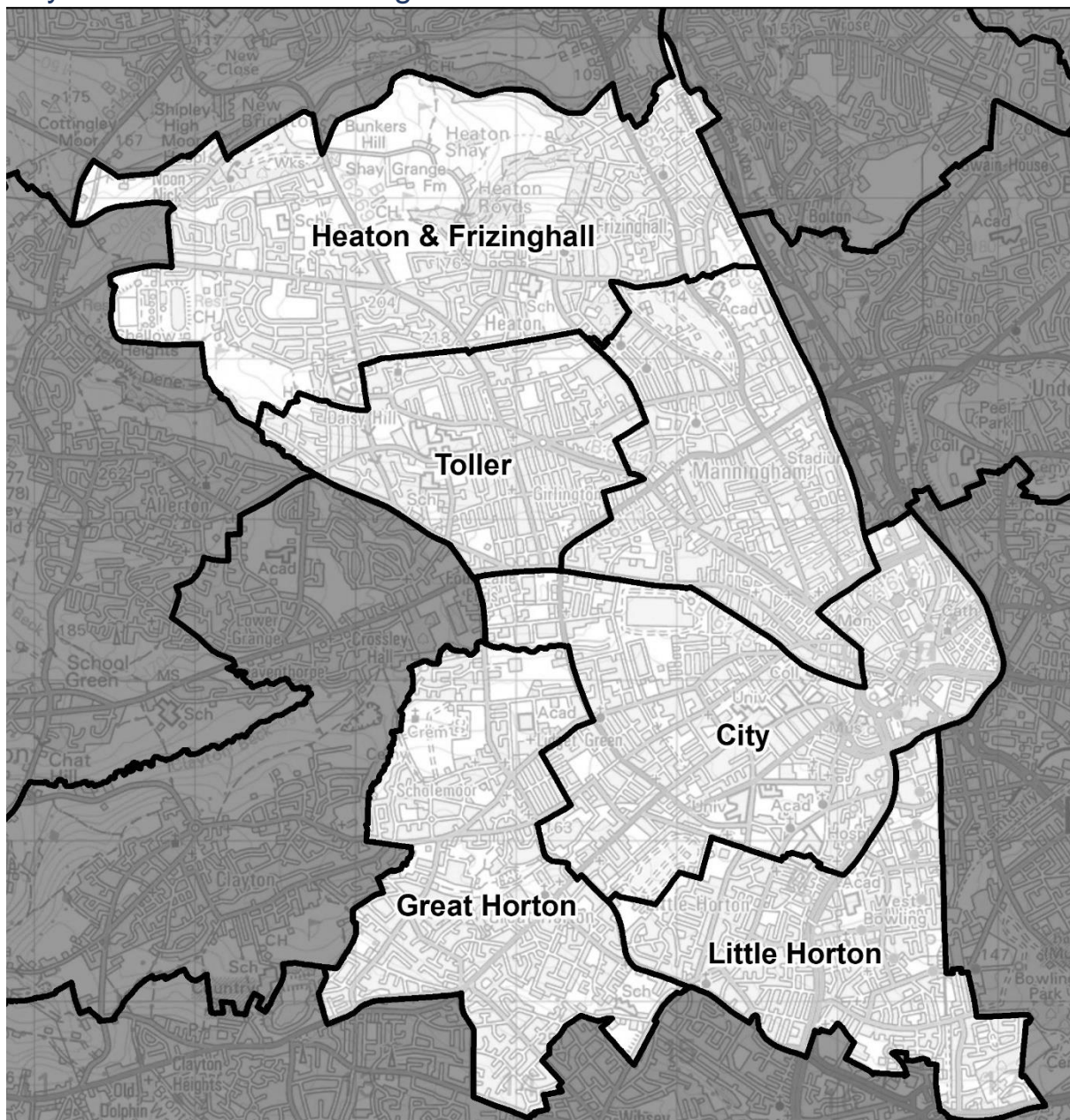
provided to justify including this area in the renamed Holme Wood & Bierley ward, given that doing so would result in an electoral variance of 16%.

102 Having visited the area, we concluded that all of Bierley should remain in the renamed Holme Wood & Bierley ward. However, there was clear evidence that Lower Woodlands area should be included in a Wyke ward, even if this meant creating a ward that crossed the M606, requiring electors to leave the ward and local authority area for a very short time to transverse it. This decision reflects the evidence provided by both the Labour Group and Oakenshaw Residents' Association.

103 We did not receive any submissions that directly related to our Queensbury, Royds or Wibsey & Odsal wards, so we are confirming them as final.

104 Our final recommendations for this area are for six three-councillor wards of Bowling & Barkerend, Holme Wood & Bierley, Queensbury, Royds, Wibsey & Odsal and Wyke with electoral variances of 10%, 1%, -9%, -8%, -7% and -8% by 2029, respectively.

## City centre and surrounding area



Ward name	Number of councillors	Variance 2029
City	3	6%
Great Horton	3	-5%
Heaton & Frizinghall	3	4%
Little Horton	3	-3%
Manningham	3	5%
Toller	3	3%

### *City and Manningham*

105 Our draft recommendations transferred an area from the City ward to Manningham ward to allow for electoral equality in City ward, which was forecast to have 14% more electors by 2029, due to a number of housing developments in the city centre.

106 The Labour Group, who made the original suggestion in their warding arrangements submission, responded to this consultation with a suggested amendment to the boundary between City ward and Manningham ward. They stated that, having consulted the Council's Cabinet member responsible for regeneration, the businesses and residents around North Parade had longstanding ties to the city centre, and for regeneration and redevelopment reasons, they should be retained in City ward.

107 They proposed an amended boundary that would follow Westgate and Drewton Road with properties and businesses to the south and east placed in City ward. They, in turn, proposed that the boundary along Sunbridge Road is moved south onto Thornton Road and that the properties and businesses that lie in between are included in Manningham ward.

108 The Greens supported the draft recommendations for these two wards. With no other comments on these proposals, we confirm the draft recommendations as final, subject to the amendment suggested by the Labour Group, which we agree reflects the community interests of the North Parade area.

109 Our final recommendations are for two three-councillor wards of City and Manningham with 6% and 5% more electors than the average for Bradford by 2029.

### *Heaton & Frizinghall and Toller*

110 Our proposed draft recommendations made no changes to the existing wards other than renaming Heaton ward to Heaton & Frizinghall ward.

111 During this consultation, the Greens supported these two wards in their submission. We received no further comments on these wards. We propose to confirm the draft recommendations as final.

112 Our final recommendations are for a three-councillor Heaton & Frizinghall ward with an electoral variance of 4% and a three-councillor Toller ward with an electoral variance of 3% by 2029.

### *Great Horton and Little Horton*

113 Our draft recommendations for Great Horton and Little Horton made one small change to the existing Great Horton ward on its southern boundary.



114 During our consultation, we received five submissions in support of the proposed wards, including Judith Cummins MP, who specifically mentioned their support for the minor change between the two wards.

115 We therefore confirm our draft recommendations as final for these two wards. Our proposed final recommendations are for two three-councillor wards of Great Horton and Little Horton, with electoral variances of -5% and -3%, respectively, by 2029.



without a footpath. They also stated that there was no public transport between the two villages. They emphasised the community ties between Clayton and Fairweather Green, by providing evidence of shared community groups. They stated that there were strong transport links between Thornton and Allerton, including regular public transport links.

119 This view was supported in the remaining submissions from local community groups and organisations. These included Café West Allerton, Clayton Estate Community Action Group, South Square Centre, Thornton Community Centre, Thornton & Allerton Community Association and Thornton Community Library, who also submitted a petition.

120 Having considered the evidence we have received and balanced it against the evidence we received during the earlier consultation, we are persuaded that the existing warding pattern better reflects the communities in the area.

121 We therefore recommend reverting to the existing warding pattern for these two wards. Our proposed final recommendations are for two three-councillor wards of Clayton & Fairweather Green and Thornton & Allerton with variances of -4% and 4%, respectively, by 2029.

## Conclusions

122 The table below provides a summary as to the impact of our final recommendations on electoral equality in Bradford, referencing the 2023 and 2029 electorate figures against the proposed number of councillors and wards. A full list of wards, names and their corresponding electoral variances can be found at Appendix A to the back of this report. An outline map of the wards is provided at Appendix B.

### Summary of electoral arrangements

	Final recommendations	
	2023	2029
Number of councillors	90	90
Number of electoral wards	30	30
Average number of electors per councillor	4,112	4,375
Number of wards with a variance more than 10% from the average	3	1
Number of wards with a variance more than 20% from the average	0	0

#### Final recommendations

Bradford should be made up of 90 councillors serving 30 three-councillor wards. The details and names are shown in Appendix A and illustrated on the large maps accompanying this report.

#### Mapping

Sheet 1, Map 1 shows the proposed wards for Bradford Council. You can also view our final recommendations for Bradford Council on our interactive maps at [www.lgbce.org.uk](http://www.lgbce.org.uk)

## Parish electoral arrangements

123 As part of an electoral review, we are required to have regard to the statutory criteria set out in Schedule 2 to the Local Democracy, Economic Development and Construction Act 2009 (the 2009 Act). The Schedule provides that if a parish is to be divided between different wards it must also be divided into parish wards, so that each parish ward lies wholly within a single ward. We cannot recommend changes to the external boundaries of parishes as part of an electoral review.

124 Under the 2009 Act we only have the power to make changes to parish electoral arrangements where these are as a direct consequence of our recommendations for principal authority warding arrangements. However, City of

Bradford Metropolitan District Council has powers under the Local Government and Public Involvement in Health Act 2007 to conduct community governance reviews to effect changes to parish electoral arrangements.

125 As a result of our proposed ward boundaries and having regard to the statutory criteria set out in schedule 2 to the 2009 Act, we are providing revised parish electoral arrangements for Baildon, Bingley, Ilkley and Keighley.

126 We are providing revised parish electoral arrangements for Baildon parish.

#### Final recommendations

Baildon Town Council should comprise 12 councillors, as at present, representing six wards:

Parish ward	Number of parish councillors
East	2
North	2
South	3
South East	2
South West	1
West	2

127 We are providing revised parish electoral arrangements for Bingley parish.

#### Final recommendations

Bingley Town Council should comprise 16 councillors, as at present, representing nine wards:

Parish ward	Number of parish councillors
Bingley Central	1
Cottingley	3
Crossflatts & Micklethwaite	2
Crow Nest	2
Eldwick	2
Gilstead	2
Lady Lane & Oakwood	1
Myrtle Park	2
Priestthorpe	1

128 We are providing revised parish electoral arrangements for Ilkley parish.

#### Final recommendations

Ilkley Town Council should comprise 14 councillors, as at present, representing five wards:

Parish ward	Number of parish councillors
Ben Rhydding North	2
Ben Rhydding South	2
Ilkley North	3
Ilkley South	3
Ilkley West	4

129 We are providing revised parish electoral arrangements for Keighley parish.

#### Final recommendations

Keighley Town Council should comprise 30 councillors, as at present, representing 15 wards:

Parish ward	Number of parish councillors
Bogthorn & Exley	1
Bracken Bank & Ingrow	3
Fell Lane & Westburn	3
Guardhouse	1
Highfield	2
Knowle Park	1
Lawkholme & Showfield	2
Laycock & Braithwaite	1
Long Lee & Parkwood	2
Morton & Sandbeds	2
Oakworth	3
Riddlesden & Stockbridge	3
Spring Gardens & Utley	3
Town	1
Woodhouse & Hainworth	2



## What happens next?

130 We have now completed our review of Bradford. Parliament must now approve the recommendations. A draft Order – the legal document which brings into force our recommendations – will be laid in Parliament. Subject to parliamentary scrutiny, the new electoral arrangements will come into force at the local elections in 2026.





## Equalities

131 The Commission is satisfied that it complies with its legal obligations under the Equality Act and that no adverse equality impacts will arise as a result of the outcome of the review.

# Appendices

## Appendix A

### Final recommendations for Bradford

	Ward name	Number of councillors	Electorate (2023)	Number of electors per councillor	Variance from average %	Electorate (2029)	Number of electors per councillor	Variance from average %
1	Airedale	3	10,903	3,634	-12%	11,805	3,935	-10%
2	Baildon	3	12,070	4,023	-2%	12,988	4,329	-1%
3	Bingley East	3	13,405	4,468	9%	15,015	5,005	14%
4	Bingley West	3	12,556	4,185	2%	13,313	4,438	1%
5	Bolton & Undercliffe	3	12,024	4,008	-3%	12,462	4,154	-5%
6	Bowling & Barkerend	3	13,674	4,558	11%	14,468	4,823	10%
7	Bradford Moor	3	12,942	4,314	5%	13,418	4,473	2%
8	City	3	13,047	4,349	6%	13,896	4,632	6%
9	Clayton & Fairweather Green	3	11,992	3,997	-3%	12,557	4,186	-4%
10	Eccleshill	3	12,911	4,304	5%	13,991	4,664	7%
11	Great Horton	3	11,809	3,936	-4%	12,413	4,138	-5%
12	Heaton & Frizinghall	3	12,436	4,145	1%	13,607	4,536	4%

	Ward name	Number of councillors	Electorate (2023)	Number of electors per councillor	Variance from average %	Electorate (2029)	Number of electors per councillor	Variance from average %
13	Holme Wood & Bierley	3	12,328	4,109	0%	13,250	4,417	1%
14	Idle & Thackley	3	13,344	4,448	8%	14,148	4,716	8%
15	Ilkley & Addingham	3	13,206	4,402	7%	13,794	4,598	5%
16	Keighley Central	3	12,280	4,093	0%	12,822	4,274	-2%
17	Keighley East	3	12,462	4,154	1%	12,933	4,311	-1%
18	Keighley West	3	11,714	3,905	-5%	12,383	4,128	-6%
19	Little Horton	3	12,077	4,026	-2%	12,691	4,230	-3%
20	Manningham	3	13,152	4,384	7%	13,810	4,603	5%
21	Queensbury	3	11,434	3,811	-7%	11,969	3,990	-9%
22	Royds	3	11,482	3,827	-7%	12,018	4,006	-8%
23	Shipley	3	11,502	3,834	-7%	12,683	4,228	-3%
24	Thornton & Allerton	3	12,565	4,188	2%	13,619	4,540	4%
25	Toller	3	13,055	4,352	6%	13,517	4,506	3%
26	Wharfedale	3	11,496	3,832	-7%	13,383	4,461	2%
27	Wibsey & Odsal	3	11,492	3,831	-7%	12,238	4,079	-7%

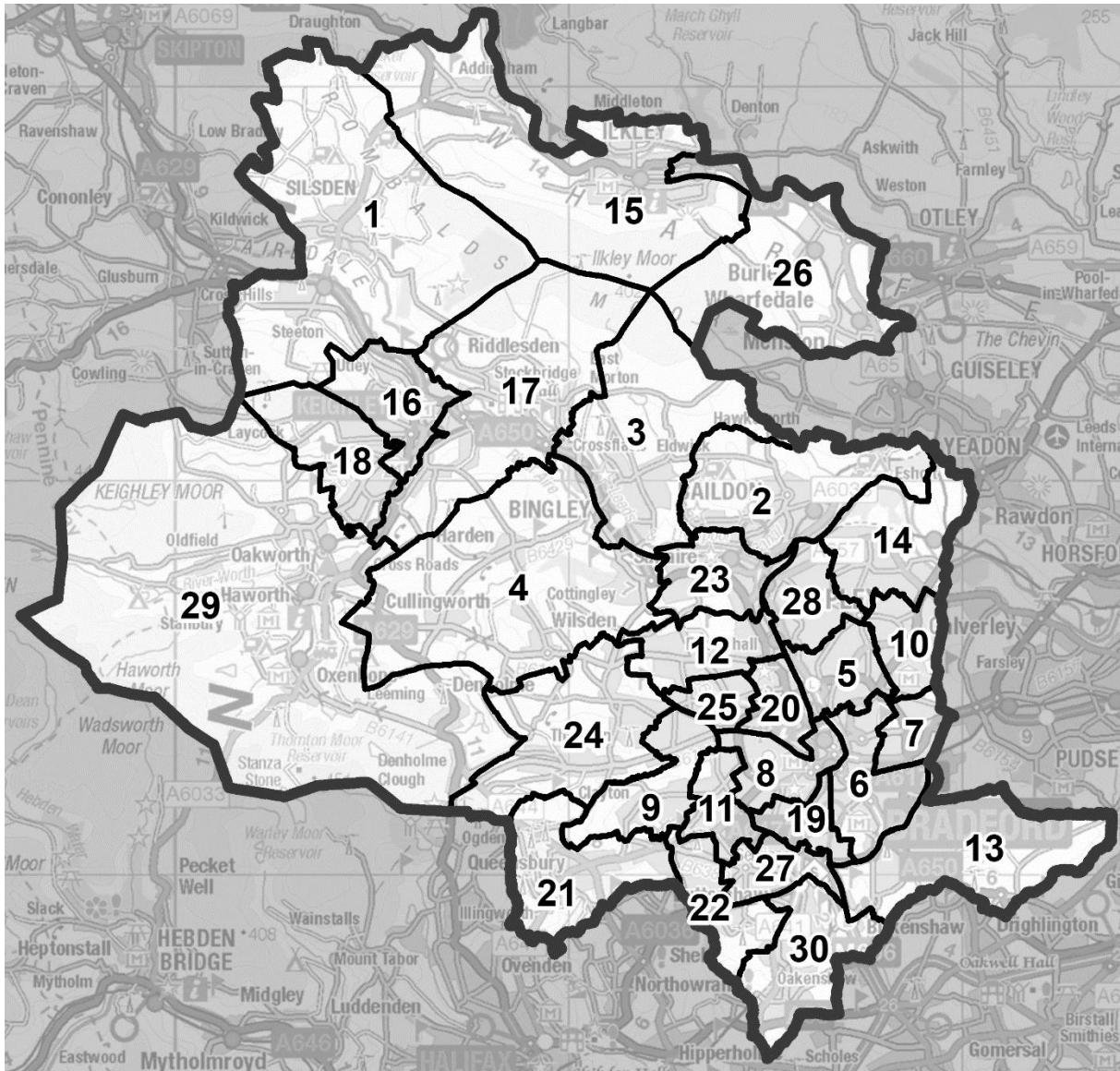
Ward name	Number of councillors	Electorate (2023)	Number of electors per councillor	Variance from average %	Electorate (2029)	Number of electors per councillor	Variance from average %
28 Windhill & Wrose	3	11,413	3,804	-7%	11,990	3,997	-9%
29 Worth Valley	3	13,803	4,601	12%	14,453	4,818	10%
30 Wyke	3	11,550	3,850	-6%	12,117	4,039	-8%
<b>Totals</b>	<b>90</b>	<b>370,124</b>	<b>–</b>	<b>–</b>	<b>393,754</b>	<b>–</b>	<b>–</b>
<b>Averages</b>	<b>–</b>	<b>–</b>	<b>4,112</b>	<b>–</b>	<b>–</b>	<b>4,375</b>	<b>–</b>

Source: Electorate figures are based on information provided by City of Bradford Metropolitan District Council.

Note: The 'variance from average' column shows by how far, in percentage terms, the number of electors per councillor in each electoral ward varies from the average for the district. The minus symbol (-) denotes a lower-than-average number of electors. Figures have been rounded to the nearest whole number.

## Appendix B

### Outline map



Number	Ward name
1	Airedale
2	Baildon
3	Bingley East
4	Bingley West
5	Bolton & Undercliffe
6	Bowling & Barkerend
7	Bradford Moor
8	City
9	Clayton & Fairweather Green
10	Eccleshill
11	Great Horton

12	Heaton & Frizinghall
13	Holme Wood & Bierley
14	Idle & Thackley
15	Ilkley & Addingham
16	Keighley Central
17	Keighley East
18	Keighley West
19	Little Horton
20	Manningham
21	Queensbury
22	Royds
23	Shipley
24	Thornton & Allerton
25	Toller
26	Wharfedale
27	Wibsey & Odsal
28	Windhill & Wrose
29	Worth Valley
30	Wyke

A more detailed version of this map can be seen on the large map accompanying this report, or on our website: [www.lgbce.org.uk/all-reviews/bradford](http://www.lgbce.org.uk/all-reviews/bradford)

## Appendix C

### Submissions received

All submissions received can also be viewed on our website at:

[www.lgbce.org.uk/all-reviews/bradford](http://www.lgbce.org.uk/all-reviews/bradford)

### ***Draft Recommendations Consultation***

#### *Political Groups*

- Bradford Council Conservative Group
- Bradford Council Green Party Group
- Bradford Council Labour Group
- Worth Valley Labour Party (two submissions)

#### *Councillors*

- Councillors R. Berry, D. Green and S. Khan (Bradford Council) – joint submission
- Councillor P. Corkindale (Keighley Town Council)
- Councillor J. Dodds (Bradford Council)
- Councillors S. Duffy, B. Mullaney and K. Regan (Bradford Council) – joint submission
- Councillors D. Heseltine (Bingley Town Council)
- Councillors A. Jabar, T. Hussain and J. Dodds (Bradford Council) – joint submission
- Councillor H. Johnson (Bradford Council)
- Councillor M. Love (Bradford Council)
- Councillor A. Loy and Councillor D. Nunns (Bradford Council) – joint submission
- Councillor L. Maunsell (Keighley Town Council)
- Councillor A. Mitchell (Bradford Council)
- Councillors A. Tait, A. Thornton and R. Wood (Bradford Council) – joint submission
- Councillor M. Truelove (Bingley Town Council)
- Councillor A. Walsh (Bradford Council)

#### *Members of Parliament*

- Judith Cummins MP (Bradford South)

#### *Local Organisations*



- Bierley Community Centre
- Bradford Trident Limited
- Cafe West Allerton
- Clayton Estate Community Action Group
- Eldwick & Gilstead Gala Association
- Lidget Green Healthy Living Centre
- Oakworth Village Society
- St John's Great Horton & St Wilfrid's Lidget Green
- Sandale Community Development Trust
- Scholemoor Beacon Community Centre.
- South Square Centre
- Spring Bank Place Neighbourhood Association
- The Sutton Centre
- Thornton Community Centre (two submissions)
- Thornton & Allerton Community Association
- Thornton Community Library

#### *Parish and Town Councils*

- Baildon Town Council
- Bingley Town Council
- Ilkley Town Council
- Keighley Town Council
- Oxenhope Village Council
- Steeton with Eastburn Parish Council

#### *Local Residents*

- 145 local residents

#### *Petitions*

- Thornton Library

#### ***Further Draft Recommendations Consultation***

#### *Political Groups*

- Bradford Council Conservative and Queensbury Independent Group
- Bradford Council Green Party Group
- Bradford Council Labour Group

#### *Councillors*

- Councillor H. Clough (Bingley Town Council)
- Councillor M. Dearden (Bradford Council)
- Councillors M. Dearden, S. Fricker and J. Wheatley (Bradford Council) – joint submission
- Councillors M. Edwards, C. Hickson and U. Sutcliffe (Bradford Council) – joint submission
- Councillor A. Foster (Baildon Town Council)
- Councillor J. Goode (Bingley Town Council)
- Councillor D. Heseltine and M. Truelove (Bingley Town Council) – two joint submissions
- Councillors M. Love, K. Warnes and A. Watson (Bradford Council) – joint submission
- Councillor D. Parkinson (Shipley Town Council)
- Councillor P. Sullivan (Bradford Council)
- Councillor J. Turner (Baildon Town Council)
- Councillor G. Winnard (Bradford Council)

#### *Members of Parliament*

- Anna Dixon MP (Shipley)

#### *Local Organisations*

- Cottingley Community Centre
- Oakenshaw Residents' Association

#### *Parish and Town Councils*

- Baildon Town Council
- Bingley Town Council
- Wilsden Parish Council

#### *Local Residents*

- 379 local residents

#### *Petitions*

- Councillor J. Wheatley (Bradford Council) – 229 name petition

## Appendix D

### Glossary and abbreviations

Council size	The number of councillors elected to serve on a council
Electoral Change Order (or Order)	A legal document which implements changes to the electoral arrangements of a local authority
Division	A specific area of a county, defined for electoral, administrative and representational purposes. Eligible electors can vote in whichever division they are registered for the candidate or candidates they wish to represent them on the county council
Electoral inequality	Where there is a difference between the number of electors represented by a councillor and the average for the local authority.
Electorate	People in the authority who are registered to vote in elections. We only take account of electors registered specifically for local elections during our reviews.
Number of electors per councillor	The total number of electors in a local authority divided by the number of councillors
Over-represented	Where there are fewer electors per councillor in a ward or division than the average
Parish	A specific and defined area of land within a single local authority enclosed within a parish boundary. There are over 10,000 parishes in England, which provide the first tier of representation to their local residents

Parish council	A body elected by electors in the parish which serves and represents the area defined by the parish boundaries. See also 'Town council'
Parish (or town) council electoral arrangements	The total number of councillors on any one parish or town council; the number, names and boundaries of parish wards; and the number of councillors for each ward
Parish ward	A particular area of a parish, defined for electoral, administrative and representational purposes. Eligible electors can vote in whichever parish ward they live for candidate or candidates they wish to represent them on the parish council
Town council	A parish council which has been given ceremonial 'town' status. More information on achieving such status can be found at <a href="http://www.nalc.gov.uk">www.nalc.gov.uk</a>
Under-represented	Where there are more electors per councillor in a ward or division than the average
Variance (or electoral variance)	How far the number of electors per councillor in a ward or division varies in percentage terms from the average
Ward	A specific area of a district or borough, defined for electoral, administrative and representational purposes. Eligible electors can vote in whichever ward they are registered for the candidate or candidates they wish to represent them on the district or borough council

The Local Government Boundary Commission for England (LGBCE) was set up by Parliament, independent of Government and political parties. It is directly accountable to Parliament through a committee chaired by the Speaker of the House of Commons. It is responsible for conducting boundary, electoral and structural reviews of local government.

Local Government Boundary Commission for  
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**Telephone:** 0330 500 1525

**Email:** [reviews@lgbce.org.uk](mailto:reviews@lgbce.org.uk)

**Online:** [www.lgbce.org.uk](http://www.lgbce.org.uk)

[www.consultation.lgbce.org.uk](http://www.consultation.lgbce.org.uk)

**X:** @LGBCE