



**2018 REVIEW – SECONDARY CONSULTATION RESPONSE**

**DEMOCRATIC UNIONIST PARTY**

**Response ID: BHLF-33PK-2YXG-B**

Submitted to **2018 Review: Secondary Consultation**

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**Comments on Democratic Unionist Party submission:**

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DUP Secondary Consultation Submission.docx was uploaded



Party Headquarters, 91 Dundela Avenue, Belfast, BT4 3BU

2nd October 2017

Mr Eamonn McConville  
Secretary  
The Boundary Commission for Northern Ireland  
The Bungalow  
Stormont House  
Stormont Estate  
Belfast  
BT4 3SH

Dear Eamonn,

Please find attached the formal response from the Democratic Unionist Party to the Secondary Consultation of the 2018 Review.

An electronic copy has also been submitted.

I trust the Commission will find this input informative and helpful in the production of their revised proposals.

If you require anything further please let us know.

Yours sincerely,

Michelle McIlveen  
Party Secretary

Enc- Party Submission

# Democratic Unionist Party Submission Boundary Commission of Northern Ireland Secondary Consultation

## 1.0 Common Themes

1.1 The Democratic Unionist Party welcomes the clear commonality between our proposals and many of the other responses submitted to the Boundary Commission's Provisional Proposals.

1.2 It is clear that others have identified the same underlying flaws and need to better comply with the rules of the review that the Provisional Proposals achieve. These underlying flaws include;

- **Numbers only** – The latest legislation does give greater primacy to the role of numbers than has been the tradition of previous boundary reviews. However, the Commission proposals seem solely driven by it. The fact that almost all of the alternative proposals result in less or significantly less electors being moved (detailed figures provided below) demonstrates there are other ways. The SDLP also consider that the Commission proposals are driven too heavily by number, stating (page 2 of their submission):

*"We believe that arguing from a narrow position of the legislative premium on numbers is needlessly reductive and if done without appropriate balance would exclude the broad number of secondary factors, which must be considered for the successful completion of this exercise. We are concerned that the current recommendations are a significant departure from previous exercises of this nature and have perhaps adopted a starkly tabula rasa approach which we would suggest exceeds the required level of clinical objectivity."*

- **A 'Blank Sheet' approach** – The Commission has essentially decided to treat Northern Ireland as a blank canvass in its redrawing of boundaries. This is a huge mistake and a breach of Rule 5.1.c – taking into account existing constituency boundaries – and this is recognised explicitly and implicitly in various submissions. For example, Lord Empey of Shandon (page 1 of the UUP submission) states:

*"It appears to us that the changes are unnecessarily drastic and in excess of what is required. We are extremely disappointed that this is the case, particularly for those seats that are within or very close to the quota... The fact that a wholesale redrawing of nearly all remaining constituencies and the creation of six entirely new ones has emerged has shocked us."*

- **Belfast first** – The Commission is clear it decided on a three seat Belfast model. The consequence of this is to push out over 25,000 voters from their pre-existing seats. This creates a wave of change that envelops most of the constituencies in Northern Ireland. This approach maximises the amount of change electors will face and harm to local identification. It is clear most of the alternative proposals start in the West and Border seats, which are already at or near quota resulting in less movement or electors. This should be the starting point for the Commission's revised proposals.

- **Misinterpretation of the law** – The Boundary Commission’s defence of the three seat model is the co-option of the City Council boundary as an appropriate Parliamentary boundary. However, this is an application of boundary law relevant elsewhere in the United Kingdom not in Northern Ireland. In the legislation local Council boundaries are a consideration in England, Scotland and Wales but not Northern Ireland. In a number of the submissions the Belfast City Council boundary is set aside, demonstrating how no one else sees it as the natural limitation for the boundaries of Belfast.
- **Failure to use Rule 7** - The 2011 Act recognised the unique nature of Northern Ireland and gave special dispensation for the creation of constituencies with 69,401 electors. This was recognising that a narrow numbers first approach would lead to the creation of very poor boundaries and ignore the very important local ties in this part of the United Kingdom. By refusing to use this rule, the Commission has failed the people of Northern Ireland. This flexibility was hard won and offers the opportunity to create boundaries that are much more reflective and acceptable to the people of Northern Ireland. Parliament approved this rule for a purpose and therefore the Commission should not be afraid to use of it.

**1.3** We believe Lord Empey’s comments particularly apply in the south of the Province where most if not all of the constituencies are within 5% of the new quota.

## 2.0 Community Impacts

**2.1** As we highlighted in our original submission, the Boundary Commission’s proposals create a scale of change that is unnecessary. The goal of a one seat reduction can be achieved much more easily. This is demonstrated by how the alternative proposals result in many less voters having to move constituency both overall and in individual constituencies. The alternative proposals abide by the spirit and letter of Rule 5 1(c) much more successfully than the Provisional proposals did. A detailed tabular breakdown of voters moved is provided in the appendices.

Area	Provisional Proposals	DUP Solution	SDLP Solution	UUP Solution	Alliance Solution	Whyte Solution
Lisburn	Division of the urban area in two	No division of the urban area	No division of the urban area	No division of the urban area but some disconnect with the rural hinterland	No division of the urban area	No division of the urban area but some disconnect with the rural hinterland
Urban Newtownabbey /Glengormley	Divided across four constituencies and splitting of Glengormley town centre across four constituencies	Two way division proposed of urban Newtownabbey and no division of Glengormley	Two way division proposed	Three way division proposed	Two way division proposed	Two way division proposed
Dungannon	Urban area divided	No division of the urban area	No division of the urban area but some disconnect with rural hinterland	No division of the urban area	No division of the urban area	No division of the urban area
Portadown	Urban area divided	No division of the urban area	No division of the urban area	No division of the urban area	No division of the urban area	No division of the urban area
Carryduff	Division of the urban area in two	No division of the urban area	No division of the urban area	Fails to address	No division of the urban area	No division of the urban area

Area	Provisional Proposals	DUP Solution	SDLP Solution	UUP Solution	Alliance Solution	Whyte Solution
Dundonald	In a fifth different constituency since 1983	Keeps in East Belfast	Keeps in East Belfast	Fails to address as it sticks to the inappropriate three seat model (though open to four seat solution).	Fails to address as it sticks to the inappropriate three seat model	Fails to address as it sticks to the inappropriate four seat model
Coleraine	Cut off from western hinterland eg Macosquin and rural area	Reunites with western hinterland of Macosquin et al	Reunites with western hinterland of Macosquin et al	Reunites with western hinterland of Macosquin et al	Reunites with western hinterland of Macosquin et al	Reunites with western hinterland of Macosquin et al
Limavady	Relationship to Coleraine	Keeps with Coleraine	Fails to address	Keeps with Coleraine	Keeps with Coleraine	Keeps with Coleraine
Ballymena	Cut off from Cullybackey and northern hinterland	Reunites with both	Reunites with both	Reunites with both	Reunites with both	Reunites with both
Castledearg	Relationship to Omagh and Strabane	Reunites with both	Reunites with both	Reunites with both	Reunites with both	Reunites with both
Cookstown	Relationship to Northern Hinterland and towns to west of Lough Neagh – Coalisland, Money more, Magherafelt	Proposals address both issues	Proposals address both issues	Proposals address both issues	Proposals address both issues	Proposals address both issues
Randalstown	Relationship to Antrim	Reunites with Antrim town	Reunites with Antrim town	Fails to address	Fails to address	Reunites with Antrim town

Newtownbreda	Three way division and into two non-Belfast seats	No division and in a Belfast seat	No division and in a Belfast seat	Two way division and in non-Belfast seats	No division in a non-Belfast seat	No division and in a non-Belfast seat
Armagh	Hinterland of Loughgall and Caledon	Proposals address this issue	Proposals address this issue	Proposals address this issue	Proposals address this issue	Proposals address this issue

**2.2** Therefore, the DUP submission provides the most comprehensive solution to these fourteen problems identified in the Commission's original proposal. However, on seven of the issues all agree on the problem (Lisburn, Dungannon, Portadown, Coleraine, Ballymena, Castlederg, Cookstown and Armagh), a further two the majority identify the problem (Carryduff and Limavady) and on Randalstown there is a majority of SDLP, Whyte and ourselves. This common analysis is a demonstration of a broad recognition of the economic social and community ties that bind these communities that the Commission's proposals failed to recognise.

**2.3** The areas of divergence stem primarily from the three or four seat issue for Belfast. However, as detailed below, there is an underlying consensus across the party submissions on the Commission's treatment of Belfast.

### 3.0 Scale of Change – Failure to abide by Rule 5.1 C

3.1 As we highlighted in our original submission, the Boundary Commission’s proposals create a scale of change that is completely unnecessary. This is demonstrated by how the alternative proposals result in many less voters having to move constituency both overall and in individual constituencies. A more detailed tabular breakdown is provided in the appendix.

#### 3.1.1 Unmoved electors

Proposer	Number of Unmoved Electors	Ranking from least to most
UUP	1,047,883	1
DUP	1,029,990	2
Alliance	1,013,151	3
SDLP	1,004,524	4
Whyte	954,459	5
Boundary Commission Northern Ireland	879,987	6

#### 3.2 Relationship to existing constituencies

3.2.1 The table below outlines how close the alternative proposals are to the existing constituencies and which of the proposals are more compliant with the rules.

Scale of change	DUP	SDLP	UUP	Alliance	Nicholas Whyte
Better than Commission	13	12	11	10	8
Equal to Commission	1	2	7	4	4
Worse than Commission	4	4	0	4	6
Total	18	18	18	18	18

### 3.3 Consistency in alternatives

**3.3.1** All of the main alternative proposals move significantly less electors than the Boundary Commission's proposals with better results in individual constituencies and with the DUP proposals still offering the best overall solution. This is built upon greater respect for the rules of the view in the alternative proposals than the Commission's provisional proposals achieved. It is related to the Commission's 'blank sheet' approach, something the Boundary Commission of England expressly rules out:

"The BCE intends to have regard generally to existing constituencies as far as possible, as it does not consider that it would be appropriate to start from a 'blank sheet of paper'."

**3.3.2** It is worth noting that all alternative proposals only abolish one parliamentary seat to deliver the required change while the Commission's Provisional proposals abolish two constituencies (South Belfast and Mid-Ulster). This is further grounds for a substantive rethink in the Commission's approach.

## 4.0 Constituency Commentaries

### 4.1 Unnecessary Change West of the Bann

**4.1.1** Responses by the SDLP, Alliance Party and UUP all share our frustration and objection to the unnecessary changes proposed by the Commission West of the Bann. Even those constituencies that already meet the required legislative quota are subject to broad and far sweeping changes in the Commission's Provisional Recommendations.

**4.1.2** These proposals are clearly at odds with Rule 5.1 A, 5.1 C and 5.1D. It is our strongly held view that these unnecessary and unacceptable proposals are as a result of the Commission's flawed proposals for Belfast.

**4.1.3** Once the Commission accept that the need for 4 seats in Belfast, the criticism of all parties to their proposals for West of the Bann can be overcome, as per the recommendations put forward by the Democratic Unionist Party.

**4.1.4** The Alliance Party, SDLP and UUP have all cited the unacceptable proposal to split Dungannon and remove it from the Fermanagh South Tyrone Constituency.

**4.1.5** We would concur with the argument put forward by the Ulster Unionist Party in respect of Fermanagh and South Tyrone in particular:

*"Dungannon has been linked to Fermanagh for Parliamentary elections since the formation of Northern Ireland. To remove such a historic link without reasons would be undesirable in any case. To remove it and not keep a historic town like Dungannon together is even worse."*

**4.1.6** It is clear that agreement exists amongst responses to the Provisional Recommendations that that dramatic changes proposed west of the Bann are unnecessary and unacceptable.

*"We are disappointed that drastic changes have been made unnecessarily." (UUP)*

*"It is also not a change designed to minimise disruption." (SDLP)*

**4.1.7** Proposals put forward by the respondents are much more compliant with rules 5.1 A, 5.1 C and 5.1 D and we recognise their merits. We do however feel that our proposals provide the best solution. This is exemplified in terms of the numbers of moved electors the Commission is proposing in Fermanagh and South Tyrone, Mid Ulster, Newry and Armagh and West Tyrone. Under the Commission's proposals only 174,184 people remain within their current constituency. Under the Democratic Unionist proposals 273,205 people remain within their constituency. The importance of which in relation to rule 5.1 C cannot be understated.

## 4.2 Fermanagh and South Tyrone

**4.2.1** It is clear that the largest number of representations in respect of any one constituency are for Fermanagh and South Tyrone. Most of the representations oppose the splitting of Dungannon. It is also very noticeable that not only do those representations want Dungannon to be united again but they specifically want Dungannon to be united in Fermanagh and South Tyrone, not united in any Upper Bann seat.

**4.2.2** Many local residents associations and community groups responded. Mid Ulster District Council criticised the fact that:

*“Dungannon, under the proposals, would be split across two parliamentary constituencies.”*

**4.2.3** Dungannon Regeneration Partnership stated:

*“...it is proposed to physically split the town between two new constituencies; North Tyrone and Upper Bann and Blackwater. We believe this would be completely detrimental to the future development and growth of Dungannon... Such changes are perplexing and serve no benefit to residents and businesses in Dungannon. The proposed changes are confusing and do not constitute a natural hinterland.”*

**4.2.4** Bush Community Cultural Group, from Bush just to the east of Dungannon, stated:

*“...bizarrely we are supposed to be in Upper Bann, albeit if we drive a mile out the road we will be, almost as strangely, in North Tyrone.”*

**4.2.5** While we are happy to be reunited as a village, I believe the commission is making a grave mistake splitting the Dungannon & South Tyrone area into three, whilst minor changes involved with the ward boundaries solve our problem. In conclusion, we prefer to be a united community within Fermanagh & South Tyrone rather than an add on to Upper Bann with which we have no ties or affinity”

**4.2.6** Granville Residents Association, from Granville just to the south-west of Dungannon, stated:

*“...we would urge the commission to reconsider and keep the local ties within the Dungannon area intact as part of the existing Fermanagh & South Tyrone”*

**4.2.7** Moygashel Residents Association, from Moygashel just to the south of Dungannon, stated:

*“We are a proud South Tyrone Community, we have nothing in common with the Blackwater never mind Upper Bann. We have strong ties with other villages locally like Moy and Benburb etc. and know that although we are on edge of Dungannon Town we have kept our own unique identity.”*

*“We would urge the commission to permit us to remain South Tyrone... We have already strong ties with Dungannon, Linen Green. Dungannon Park and public paths connecting the village with other parts of Dungannon”*

#### **4.2.8** The Simpson Grant Association, from near Ballygawley, stated:

"We cannot see any logic in these proposals; the current Fermanagh & South Tyrone is long established... We would urge the commission to stick to the established well known boundaries and community ties that have grown up over almost 100 years."

#### **4.2.9** Drumbeg Women's Institute, although focussing on the splitting of Lisburn, also commented that:

*"other areas such as Dungannon, have difficulties with how they have been realigned and we recommend that some adjustments to the proposals be made to accommodate their concerns."*

#### **4.2.10** Outside of Dungannon, it is clear there is no appetite from the area around Omagh that the Commission propose to transfer to Fermanagh and South Tyrone to be moved out of West Tyrone. Ryan McKinney, whose postcode indicates he lives in Omagh or West Tyrone, stated forcefully in two submissions:

"Castleberg does not belong in Fermanagh/South Tyrone!"

"Aughnacloy does not belong in Fermanagh/South Tyrone. Neither does Drumquin, and especially Newtownstewart or Castleberg. Newtownstewart and Castleberg should be part of North Tyrone!"

#### **4.2.11** Most submissions propose Aughnacloy be included in Fermanagh and South Tyrone which is the constituency it is currently in, but we agree on the other three towns noted. William Gordon Nabney, who lives in east Belfast but previously lived in Newtownstewart, stated:

*"I see that the provisional proposals place [Newtownstewart] in Fermanagh South Tyrone for the first time in its history, yet most of its associations are with Omagh and Strabane, and in Local Government terms it is with Derry City and Strabane rather than Fermanagh and Omagh. If I may say so the provisional proposals for North Tyrone and Fermanagh South Tyrone look base-over-apex at first sight in purely geographical terms"*

#### **4.2.12** These responses clearly show the merits of the proposals put forward by the Democratic Unionist Party in relation to Fermanagh South and Tyrone. We provide a solution to the overwhelming concerns raised and are our proposals are much more compliant with rules 5.1 C and 5, 1 D

### **4.3 Newry and Armagh**

#### **4.3.1** We note only one comment from this constituency, from Philip Agnew whose BT61 postcode would suggest he is from Loughgall. He states:

*"The proposals would break my local ties and my address is being moved from the Newry and Armagh Constituency to the Upper Bann and Blackwater Constituency. I have lived my entire life in Newry and Armagh and these proposals would severely disrupt my life."*

#### **4.3.2** Nearly all the submissions, including our own, return Loughgall to Newry and Armagh.

## 4.4 Upper Bann

4.4.1 There is a consistency across the DUP, Alliance, SDLP and UUP alternative proposals that Portadown, Lurgan and Bainbridge remain the three building blocks of an Upper Bann constituency.

4.4.2 The extent of change proposed by the Commission in Upper Bann runs counter to rule 5.1 D. There are clear merits in the proposals put forward by others for Upper Bann, but on the whole, we believe our proposals are much more compliant with the rules the Commission must operate under.

## 4.5 North Antrim/East Londonderry

4.5.1 Many of the representations received either criticise the addition of Coleraine to the Dalriada seat (which is the closest successor to North Antrim) and/or criticise the exclusion of Ballymena which is thereby cut off from its hinterland in Dalriada, such as in Cullybackey or Portglenone.

4.5.2 Traditional Unionist Voice state:

*“It is our strong belief that these proposals would not have seen the light of day if the Commission had even followed what it claims to be the approach adopted in its report. You will not get any greater ties than that of the villages of Ahoghill, Cullybackey and Portglenone”*

4.5.3 Tyler Hoey from Culleybackey states:

*“Cullybackey has been the heartland of Bannside”*

4.5.4 Comments from Coleraine, on the other hand, object to their inclusion with a large area of County Antrim. Margaret McIntyre from Coleraine states:

*“...I find that Coleraine, County Londonderry, would be in a new constituency of Dalriada. I am very much against this...”*

4.5.5 Michael Torrens from Coleraine also states:

*“I disagree with Coleraine being in the Dalriada constituency as it is in a different county than the most of the proposed constituency. It doesn't seem right that the top corner of county Derry/Londonderry has been cut off and stuck on the edge of this new constituency.”*

*“I would propose placing Coleraine back where it belongs in the Glenshane constituency and to substitute this by putting Ballymena in this constituency.”*

**4.5.6** Mr Torrens' suggestion would indicate a Dalriada constituency much more like the present North Antrim which is the position of ourselves, the Alliance Party, the SDLP, the UUP, as well as David McWhinney, Nicholas Whyte, Peter Whitehead, Wesley Brown, and although it is fair that we all disagree on the exact make-up and name of this constituency we all agree on the inclusion of Ballymena and the exclusion of Coleraine.

## **4.6 Lagan Valley**

### **4.6.1** Drumbeg Women's Institute state:

"It is concerning that Lisburn, a city, will be split in two and... we recommend that some adjustments to the proposals be made to accommodate their concerns."

### **4.6.2** Owen Gawith from Lisburn states:

*"It seems the review board have simply taken the river through Lisburn as the most convenient border, and by doing so they have split the city with no thought to administrative unity."*

*"People from Lisburn are unlikely to feel any affinity with those of Antrim town or with those of Banbridge, and people from anywhere in the newly created Lisburn & Castlereagh City are just getting to grips with the realities of this being our Local Government unit for the foreseeable future. To change Stormont & Westminster constituencies will simply add difficulties."*

**4.6.3** A number of counter-proposals repeat the division of Lisburn along the River Lagan, while other counter-proposals divide Lisburn arbitrarily along other lines. Only the counter-proposals from us, the SDLP, Harry Hayfield and Stephen McFarland recognise that Lisburn now spans the river (which is also the historic Antrim-Down county boundary) and that it would break ties to divide Lisburn between constituencies.

## **4.7 Four Seat Belfast**

**4.7.1** It is clear that cross party and community consensus exists in Northern Ireland to maintain 4 seats in our capital city. Many of the proposals highlight the important role Belfast plays as the economic, cultural and social heart of Northern Ireland.

**4.7.3** The UUP, SDLP, Alliance Party, the former Member of Parliament for South Belfast and a number of other respondents all echo our view that the proposals in the Provisional Recommendations for Belfast are unreflective and unacceptable.

**4.7.4** As we highlighted in our initial response the reliance by this Commission on the Belfast City Council Boundaries as the basis for Parliamentary Boundaries has produced hugely flawed proposals that are being used as a means of unnaturally expelling 25,000 people from Belfast Constituencies.

**4.7.5** On Belfast City Council Boundaries being used as artificial Parliamentary Boundaries respondents said the following:

The SDLP stated (page 3 of their submission)

*“Rather than taking Belfast City Council as a primary definition of place and identity we can see that Belfast as a conurbation has extended far beyond that area covered by Belfast City Council and the proposed constituencies.”*

The Alliance Party stated (page three of their submission)

*“Residents in these wards would look more naturally to Belfast”*

The Ulster Unionist Party stated (page 14 of their submission)

*“In many ways [including Newtownabbey in a Belfast seat] reflects a reality which the City Council ignores.”*

Lord Empey of Shandon stated (page 2 of the UUP submission):

*“It is obvious to everyone that the natural boundaries of Belfast extend far beyond the City Council boundary.”*

The reduction of seats in Belfast was also opposed by public representatives and local residents. Claire Hanna MLA, of the SDLP, stated:

*“I support the concept of retaining 4 seats for Belfast”*

Paul Andrews stated:

*“I believe the reduction of 4 to 3 Belfast constituencies will erode the distinct character that the four current constituencies possess... I think that the proposed changes will carve up these traditional areas with strong identities and lead to anxieties regarding representation, particularly in the most deprived areas of Belfast.”*

Jason Cantellevan stated:

*“As Belfast has such a large population within NI I believe that the 4 current constituencies of Belfast West, Belfast North, Belfast East and Belfast South should be kept as they are with no changes to their borders. They should not be merged and changed into 3 constituencies.”*

**4.7.6** Although Mr Cantellevan’s request to leave the four Belfast seats unchanged is not possible under the Rules, we agree with his request for four seats in Belfast rather than three.

**4.7.7** Albert Cooke stated:

*“Whilst I can understand the need for change, I take the view Belfast is an expanding city and the 4 Belfast constituencies be kept.”*

#### **4.7.8 Dale Pankhurst stated:**

*“I think it is wrong that Belfast should lose an MP seat given the size of the electorate that live there. Belfast should retain four MP seats... The fundamental point I am making about my opposition to the proposed changes is that Belfast should retain four seats. If this means the current four seats expanding to obtain more ground/more electorate then so be it.”*

**4.7.9** In the SDLP, UUP and Nicholas Whyte alternative proposals, they all breach the present Belfast City Council boundaries. This includes wards in Dundonald, Newtownabbey and Holywood.

**4.7.10 It is clear that there is strong local support for retaining four seats for the Belfast area as has been the case since 1922.**

#### **4.8 Past Precedent**

**4.8.1** All these proposals reinforce the important precedent set by previous Commissions in rejecting the idea of a seat 3 proposals for Belfast. The Fifth Commission after thorough investigation established Belfast City Council boundaries were not reflective of the modern City. The economic, social and community ties extended then beyond the Council boundaries and this continues to be the case today. Quoting from that report:

*“The Assistant Commissioner considered it an unnecessary constraint to regard Belfast as being bound by the historic designation of the local government boundary, which no longer recognized the suburbanization of Belfast and close ties and links with the City. Accordingly, the Assistant Commissioner recommended the retention of four Belfast seats...I would consider that prevalence of very close ties and links to the City through work, family social ties and other relationships, and the detriment caused to them by the remodelling of the City borough constituency framework as counter proposed leads me to the view that the provisional recommendation for retention of four borough seats is to be commended...I would consider it likely that such inconvenience would not be insignificant or immaterial and that it would be of such nature and degree as to warrant it to be of influential account when addressing the reshaping of the constituencies.”*

**4.8.2** The argument over Belfast City Council Boundaries being unreflective and the need for 4 seats in Belfast was recognised a long time ago. That argument was won and the issue settled.

#### **4.9 Rule 5.1 C (Parliament Constituencies Act 1986)**

**4.9.1** The SDLP in particular share our concern with the failure of the Commission to obey Rule 5.1 C in their proposals for Belfast. This rule clearly states the Commission should take into account boundaries of existing constituencies. The negative impact of this spreads across Northern Ireland under the Commission’s original proposals.

**4.9.2** The Commission has clearly failed in this regard, as their proposals to shrink Belfast would result in the expulsion of 25,194 voters of their current Belfast Constituency. This is made all the more unjustifiable when the Commission would only be required to add just over 17,000 voters to maintain four seats in Belfast.

**4.9.3** In terms of unmoved Electors for Belfast, the Commission's proposal only maintains 142,662 electors in their current constituency.

**4.9.4** The Democratic Unionist Party maintains 251,429 electors in their current constituency in Belfast, 76% greater than the Commission

**4.9.5** The SDLP maintains 244,115 electors in their current constituency in Belfast, 71% greater than the Commission.

**4.9.6** It is clear that both these proposals are much more compliant with Rule 7.3 than the Commission's proposals, resulting in further evidence that the Commission's proposals for Belfast must be overturned.

#### **4.10 Rule 5.1 D (Parliament Constituencies Act 1986)**

**4.10.1** Rule 5.1 D requires the Commission to take into account local ties that would be damaged by their proposals. Indeed Page 6, Chapter 3 of the 'Guide to 2018 Review' states

*"The Commission will take into account of any clearly identifiable' local ties which would be broken by its proposed changes."*

**4.10.2** Damage to local ties in Belfast is enormous in the proposals put forward by the Commission and we welcome the concerns raised by other parties and others in this regard. This is particularly prevalent in the Newtownbreda/Carryduff areas of South Belfast, the Newtownabbey section of North Belfast and the Dundonald area of East Belfast. These damages to community ties have been clearly referenced by both the SDLP and the UUP in their response to the Commission.

#### **4.11 North Belfast**

**4.11.1** Under the current proposals North Belfast would lose the overwhelming majority of its Newtownabbey base which would have a huge impact on local community ties. The current position of Commission runs against the previous and acceptable notion of urban Newtownabbey being inextricably linked to North Belfast.

**4.11.2** The current proposals remove any chance of a clear boundary between North West Belfast and its neighbouring constituencies at all points at the Newtownabbey end.

**4.11.3** Glengormley town centre would be divided across 4 seats with a blurred boundary in the centre through housing developments, street corners and main roads. In the Fifth Periodical Review both Assistant Commissioners concluded that it would be detrimental for the Glengormley area to be divided between constituencies.

**4.11.4** At the Rathcoole end, again the Commission proposed an unnatural and unacceptable boundary that would divide streets and housing developments into different constituencies.

**4.11.5** Community, economic, historical and social ties have all been ignored by the Commission in their attempt to deny Newtownabbey its rightful place within North Belfast. The wider Rathcoole area has historically been included in North Belfast for many years and this attempt to remove it by the Commission is particularly alarming.

**4.11.6** In fact the argument for the inclusion of the whole of the current Macedon DEA into North Belfast is much stronger; currently around 80% of the electorate reside in North Belfast and have done so for since 2001.

**4.11.7** The reality of the situation is the inclusion of urban Newtownabbey in North Belfast is well established and well respected. The attempts to rend these communities cannot be justified. Popular opinion and indeed common sense would suggest that more of Urban Newtownabbey should transfer into North Belfast as the current settlement still does not reflect the growth and links of modern Belfast.

**4.11.8** The anger caused by these proposals has resulted in Antrim and Newtownabbey Council passing a unanimous motion objecting to the proposals and to divide urban Newtownabbey. Their response stated the following;

*“Following consideration the Council’s view is that the division of the Borough into so many parliamentary constituencies would be detrimental. The Council believes that the proposed boundary changes would weaken its position to engage with the Northern Ireland Assembly and Westminster on issues of concern to the Borough. Specifically the Council would draw attention to the division of urban Newtownabbey into multiple parliamentary areas, and the specific example of Glengormley which would now be divided into four. These changes if enacted would cause confusion for local residents and their ability and willingness to engage.”*

**4.11.9** The Commission must listen and reinstate urban Newtownabbey and the entirety of Glengormley into North Belfast.

## **4.12 East Belfast**

**4.12.1** East Belfast suffers greatly at the hands of the Commission’s attempts to break strong and historic ties in the Belfast area. The removal of 5 of the suburban wards for East Belfast is not acceptable and again runs counter to the informed decision making of the previous Commission who recognized East Belfast stretched outside of the narrow boundaries of the City Council.

**4.12.2** The Castlereagh and Dundonald areas are well established centres and hearts of East Belfast, being populated by people, churches and

organisations who see themselves as part of East Belfast. These areas have a strong and unquestionable connection to East Belfast and attempts to remove them from their natural home has been rejected by sports clubs, community groups, churches and residents groups. This was reflected in many representations.

**4.12.3** Albert Cooke stated:

*“I see Dundonald as greater East Belfast. I would contend that it's quicker for me to reach Belfast City Centre from Dundonald than it for me to reach it from say Beechmount... I believe Belfast is an expanding city and the 4 constituencies of Belfast be retained. I think it's crazy that the Comber Road, East Link Road, area around Dundonald Ice bowl should be placed in North Down.”*

**4.12.4** The Greater East Belfast identity is a very strong characteristic of the urban part of the constituency and they look naturally towards the City with family and work links that have been in place for generations. The continuing sprawl of East Belfast must be taken strongly into account.

**4.12.5** The people of Dundonald have moved constituency at each of the four previous boundary reviews and if moved again at this review, will have been moved for the fifth time in just over 40 years. This continued movement and breaking of community ties is hugely damaging to the democratic process. We highlight the constituencies Dundonald has been in below:

Years	Constituency	Note
1950-1974	North Down	The former North Down seat which also covered what is now Strangford and the Co Down part of Lagan Valley
1974-1983	Belfast East	
1983-1997	North Down	
1997-2010	Strangford	
2010-2017	Belfast East	
2017 (proposed)	North Down	

**4.12.6** This concern is shared by the UUP who state (page 5 of their submission):

*“Dundonald was previously part of North Down and has unfortunately moved between constituencies several times over the years.”*

**4.12.7** This area has become settled and fully integrated within East Belfast and is at peace with itself located within the City. Any further attempts to move them will be greatly resisted. Considering the Commission's use of Council boundaries as justification for their decisions, it is worth noting the Civic Headquarters for the people of Dundonald would be located 2 constituencies away under the Provisional Recommendations, with residents having to travel through North Down and East Belfast. The Ulster Hospital, which primarily serves East Belfast, would not be in that constituency.

**4.12.8** Although the Commission may not have had the time to consider the consequences of their proposals fully, with this evidence we would trust due action will be taken.

**4.12.9** We note that Nicholas Whyte submission agrees with expansion in a Holywood direction for East Belfast (although his proposals would divide the town while ours do not).

### **4.13 South Belfast**

**4.13.1** The proposal to expel Newtownbreda and Carryduff from South Belfast is indefensible. For example it would leave the main controlled secondary school for South Belfast, Breda Academy outside the constituency. It does not recognise how residents of Newtownbreda and Carryduff utilise the other secondary schools across South Belfast. In physical build, Newtownbreda is a straight extension of the city with no green wedge or gap in the line of development. The development of Carryduff in the past few decades has been driven by commuter families moving from elsewhere in South Belfast utilising the main road/roadlink into Belfast. The division in two is an example of the numbers over-ruling community ties. The transport links to the two towns the Commission proposes linking Carryduff with - Newtownards and Lisburn - are significantly poorer in comparison with the road links to Belfast.

**4.13.2** Probably the largest number of comments from the greater Belfast area are in relation to Newtownbreda which the Commission propose to remove from Belfast South and split between Strangford and West Down.

**4.13.3** Claire Hanna MLA, of the SDLP, stated:

*"In the case of southwards, the wards of Beechill, Cairnshill, Carryduff East, Carryduff West, Knockbracken and Newtownbreda were allocated to Lisburn and Castlereagh when, by any criteria, they clearly identify with Belfast."*

*"The proposal to put the former South Belfast wards of Beechill, Carryduff West, Knockbracken and Newtownbreda wards into the proposed new constituency of West Down is particularly perverse. These wards are part of the Belfast conurbation and are suburbs of Belfast. They have been part of either South Belfast or Strangford constituencies for decades and to recommend that they be put in with the new constituency of West Down, which predominantly consists of the wards of Armagh, Banbridge and Craigavon Council area, together with some wards of Lisburn and Castlereagh wards, is nonsensical. The error is particularly compounded by the decision to split the two wards of Carryduff, with Carryduff East going into Strangford and Carryduff West going into West Down."*

#### 4.13.4 Cllr Joe Boyle, an SDLP councillor on North Down and Ards Council, stated:

*“When we look at the map for the new proposed boundaries we notice that the DEA of Castlereagh South is divided between West Down and Strangford in an awkward manner. Carryduff is divided in half with Carryduff East in Strangford and Carryduff West in West Down. The Galwally and Cairnshill wards are in Strangford and Beechill, Newtownbreda and Knockbracken are in West Down. Indeed if you look at pages 8,10,12,13 and 18 of the Lisburn Castlereagh council map you will see that literally at the junction of Galwally and Newtownbreda wards some streets will have voters on one side of the street in Strangford and the other side of the street in West Down.”*

#### 4.13.5 Michael Dunlop, a resident of Newtownbreda, stated:

*“On a local level, I live in the Four Winds area of Belfast and I work in and around the City. My son attends a school in the area and my family has a deep connection with and considers itself to be a part of the community in the small geographical area that constitutes the Four Winds, Rosetta and Ormeau Road. It's an area that is distinctly South Belfast in character and is currently represented by the MP for South Belfast.”*

#### 4.13.6 Shauna Dunlop, a resident of Newtownbreda, stated:

*“I currently live in the Four Winds area, just a mile or two from the popular Ormeau Road at the heart of South Belfast. I feel that this makes me a citizen of Belfast, primarily South Belfast. This community is very important to me and my family; my children consider themselves part of the South Belfast community. The changes proposed would mean our political representative would be the MP for Strangford. This is a town that would take me approx 1.5 hours to travel by car to. Whereas I have no objections or issues that are relevant to the Strangford area, I personally don't feel any affinity to this area.”*

#### 4.13.7 Stephen Michael Orr, a resident of BT8 which covers Carryduff and Newtownbreda, stated:

*“I think the Cairnshill area (formerly part of Belfast South), which marks the south-eastern limit of housing developments in Belfast has a more natural link for residents with Belfast than with the more rural areas to the east and therefore would perhaps be better suited to joining the Belfast East constituency than Strangford.”*

**4.13.8** It is worth noting that the DUP, SDLP, Alliance and Whyte alternative proposals all advocate that Newtownbreda and Carryduff should be together.

### 4.14 West Belfast

#### 4.14.1 We note the representation of James Marshall, who is from either Dunmurry or Derriaghy, who states:

*“I am writing to ask why the commission have not considered why my local Belfast area (Dunmurry, Killeaton, Fairview Park, Mossie road and Rose garden) residents have not been considered as part of the Belfast South West constituency. We have a Belfast postal addresses (mine is BT17 \*\*\*) and clearly associate with the Belfast / Dunmurry area in terms of schools, shops and transport... we clearly all view ourselves as Belfast residents (thus the postal Address - Belfast BT17).”*

**4.14.2** We note that only our submission would bring the Derriaghy area into a Belfast seat by adding Derryaghy and Lambeg wards to Belfast

West. The SDLP also add Derryaghy to Belfast West though adding Lambeg to a curiously shaped Strangford. No other counter-proposal addresses Mr Marshall's concerns.

*"We are alarmed that the most immediately evident aspect of this reduction is the radical redrawing of boundaries within Belfast and the consequent loss of a parliamentary constituency for Northern Ireland's social, cultural and economic centre."*

**4.14.3** This has been strengthened even further since the initial publication of the Provisional Recommendations with the announcement by the Government of a City Deal for Belfast. The geographical area included in this goes far beyond the City Council Boundaries and includes all the wards that we have put forward for inclusion in Belfast seats.

**4.14.4** Any move which undermines this important economic tool should not be undermined by artificial boundaries, particularly, given the almost universal objection to a three seat Belfast in the responses received by the Commission.

## **5.0 Conclusion**

**5.1** From the alternative proposals the Commission has a clear mandate to radically alter its provisional proposals. The Commission will have clearly seen from the responses that a large number of problems are created by the Provisional Recommendations. We believe that we have put forward the underlying issues that caused these flaws and hope they can be constructively used.

**5.2** We have identified a large range of areas that community ties will be broken by the Commission's Proposals that breach rule 5.1 D. We believe the solutions that we have offered and indeed received widespread support for; reunite communities whilst simultaneously being more compliant with Rule 5.1 D.

**5.3** The scale of change proposed by the Commission is in our and indeed others view highly unnecessary, particularly West of the Bann where such change is not required. We have clearly identified the flaws of these proposals in relation to Rule 5.1 C as shown in our chart on page 4.

**5.4** The SDLP and UUP proposals contain a lot of merit and do obey the rules more closely than the Provisional Recommendations. Whilst we believe they give a better proposal than the Commission, having read all the consultation responses, we believe our proposals deliver the best, well rounded and most rule compliant solution to the concerns raised by the people of Northern Ireland.

**5.5** We thank the Commission for all their work and dedication and trust our concerns and those of the people of Northern Ireland will be reflected in the next stage of this process.

## Appendix 1- Comparison of unmoved electors- Boundary Commission Provisional Proposals v Primary Responses

Predecessor seat	BCNI	Alliance	DUP	SDLP	UUP	Nicholas Whyte
Belfast East	48662	48662	60528	60528	48662	48662
Belfast North	49764	45336	62112	58572	53958	49764
Belfast South	0	0	63051	63051	0	0
Belfast West	44236	40859	65738	61964	47733	40859
East Antrim	57550	52683	53027	53027	57550	52683
East Londonderry	37928	52855	47641	39201	52855	50650
Fermanagh and South Tyrone	56319	71038	71038	68882	71038	71038
Foyle	71398	71398	71398	71398	71398	71398
Lagan Valley	70925	* 68232	44844	49647	58989	51521
Mid Ulster	0	61811	66684	51976	61573	59252
Newry and Armagh	71564	75389	75635	75389	75389	75389
North Antrim	43079	58546	50969	45731	60289	45731
North Down	62451	62451	53573	56488	62451	59605
South Antrim	36150	47603	0	0	55756	31217
South Down	70250	73134	70578	70250	70250	69821
Strangford	67168	50212	45596	45596	67168	47328
Upper Bann	46242	69766	66281	69648	69648	66365
West Tyrone	46301	63176	61297	63176	63176	63176
		1013151	1029990	1004524	1047883	954459

\* Contributes to two seats: 37882 to South Antrim, 33043 to West Down

Colour	Meaning
Green	Better than the Commission
Yellow	Same as the Commission
White	Worse than the Commission

In accordance with rule 5.1 C the Democratic Unionist Party proposal delivers the greatest of compliant constituencies, with 13 of our proposal being more compliant than those proposed by the Commission as referenced on page 4 of this response.