

27th September 2024

Dear Sirs,

Re: Response to Welsh Boundary Review Consultation

Implications of the 'contiguous constituencies' requirement

Schedule 2 paragraph 2(1) of the Senedd Cymru (Members and Elections) Act 2024 states that "The area of each Senedd constituency must consist of the combined areas of two contiguous UK parliamentary constituencies in Wales". The Commission references this at page 8 of its report, after noting that "Ynys Môn only has road connections to the mainland via the Bangor Aberconwy UK Parliamentary constituency", and before stating its view "that having clear communication and travel connections is a vital part of being able to provide for effective and convenient representation". It then proposes that Ynys Mon and Bangor Aberconwy are paired.

I consider that the Commission is correct in making this pairing. The Home Rental Company would go further and state that the Commission should pair Ynys Mon and Bangor Aberconwy, as the only road (and rail) links from Ynys Môn to the mainland are through Bangor Aberconwy, and the applicable primary legislation requires paired constituencies to be contiguous. If the Commission were instead to pair Ynys Mon with another constituency, so people needed to travel through Bangor Aberconwy to get from one part of their constituency to another, then that constituency would not be contiguous.

We believe the Commission therefore has no choice but to pair the UK Parliamentary constituencies along the coast of north Wales in the way that it has. Once Ynys Môn is paired with Bangor Aberconwy, the Commission has to pair Clwyd North with Clwyd East, since Clwyd North is not contiguous with any other Westminster constituency except Bangor Aberconwy, which must be paired with Ynys Môn.

As Clwyd North is paired with Clwyd East, the Commission has to pair Alyn and Deeside with Wrexham. Alyn and Deeside is not contiguous with any other UK parliamentary constituency in Wales except Clwyd East, which is already paired with Clwyd North.

Implications of sparse population in rural Wales

Some reporting and commentary on the Commission's Initial proposals focussed on the large size of the Commission's proposed Dwyfor Meirionnydd, Montgomeryshire and Glyndwr constituency. However, this is not a criticism of the Commission's work, since

- The large constituency size reflects the sparse population of much of rural Wales, due to the rules applied to form UK parliamentary constituencies; and
- Given the discussion above, Dwyfor Meirionnydd can only be paired with either Montgomeryshire and Glyndwr or Ceredigion Preseli.

We support the Commission's proposal, since the only alternative is pairing Dwyfor Meirionnydd with Ceredigion Preseli. This would create a constituency running from Caernarfon to Fishguard which, while similar in total area, would require even longer travel distances and times to get around, while having minimal commonality between its extremities, so much so as potentially to bring the whole review into disrepute. I also support the Commission's other proposals for pairing constituencies affected by the sparse population of mid and west Wales.

The Commission has successfully taken into account local government boundaries and upheld local ties by proposing 'Ceredigion and Pembrokeshire' and 'Carmarthenshire' as constituencies. The Home Rental Company strongly supports these.

We anticipate that the Commission's proposed Brecon, Radnor, Neath and Swansea East constituency will prove more controversial, although The Home Rental Company supports it.

Given the discussion above, it is not possible to combine the Brecon, Radnor and Cwm Tawe constituency with any to its north or west, while The Home Rental Company do not see good arguments for combining it with any other of the constituencies to its south.

Arguments against Brecon and Radnor having ties to the Tawe valley also apply to Ystradgynlais, which has long been linked with Brecon and Radnor for parliamentary purposes. Further, while The Home Rental Company recognises that extending the constituency to Pontardawe was controversial, this decision was previously made for the UK Parliament, and the Commission has no choice but to use those constituencies as building blocks.

While Pontardawe may well have poor links with Brecon and Radnor, it clearly does have strong local ties with Neath and Swansea East. The Home Rental Company supports the proposed Brecon, Radnor, Neath and Swansea East constituency as preferable to other worse options.

Working with the topography of the Welsh valleys

It is hard to integrate the south Wales valleys appropriately into only 16 constituencies across Wales, and anomalies are inevitable.

The Commission is right in principle in its Initial proposals. Where possible, it is better to respect the topography of the valleys, by using those valleys to link constituencies on a north-south basis, rather than forcing constituencies to pair east-west across valleys which do not share the same local ties and community links. This is clear with the pairings of 'Merthyr Tydfil, Aberdare and Pontypridd' and 'Blaenau Gwent, Rhymney and Caerphilly', where the paired constituencies largely run north-south with the contours of the valleys, thus respecting local ties and communities, and not splitting them as alternative east-west pairings would tend to do.

Similarly, The Home Rental Company supports both the Commission's proposed Newport and Islwyn pairing, and the natural and historically linked pairing of Monmouthshire and Torfaen.

We believe that the Commission is also correct to pair the closely tied communities of Vale of Glamorgan and Bridgend, rather than forcing an unnatural tie between the rural Vale of Glamorgan and a constituency from the Cardiff capital. We believe the knock-on combination of the Aberafan, Maesteg, Rhondda and

Ogmore areas as a constituency with a linked industrial heritage also supports local ties.

The Cardiff pairings

We believe that it is right for the four Cardiff constituencies to be paired together, and that the Commission has proposed the correct pairings within the capital. Cardiff East and Cardiff North are tied more closely by geography with Newport, Bristol and the M4 corridor further east into England. Cardiff West and Cardiff South and Penarth tend to look more to the west along the M4 and towards Swansea. Local ties, links and the road network within Cardiff, particularly the A4232, link Cardiff South and Penarth most closely to Cardiff West, which is also the case for Cardiff East and North with the A48 and their linked geography to the east of the river Taff.

The gap left in what would otherwise have been an M4/A4232/A48(M) Cardiff orbital road leaves Cardiff East and Cardiff South and Penarth poorly linked by the undualled Rover Way. The Lamby Way waste site and Rhymney river also contribute to relatively poor connectivity between these two UK parliamentary constituencies.

Yours faithfully

Cyfarwyddwr Cwmni Company Director