

Polling district and polling place review

Report number:	COU/WS/23/023	
Report to and date:	Council	19 December 2023
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Decisions Plan: **Not applicable as this is not an executive matter**

Wards impacted: **All wards**

Recommendation: **It is recommended that Council:**

- 1. Approves the amended scheme of polling districts and polling places as set out at Appendix A to Report number: COU/WS/23/023.**
- 2. Authorises the Chief Executive to amend the scheme of polling districts and polling places for Moreton Hall Ward and Haverhill West Ward following completion of the necessary assessments, as detailed in the Report number: COU/WS/23/023, and in consultation with relevant ward members.**
- 3. Authorises the Chief Executive, as Electoral Registration Officer, to take the necessary measures as soon as possible to give effect to parliamentary constituency changes,**

ensuring that the register reflects existing and new constituencies, until the boundaries are fully in force.

- 4. That power to designate polling places, is delegated to the Chief Executive. Such power to be exercised where the decision is required at short notice and it is not possible to await a decision of Council.**

1. Context to this report

1.1 There are three ways of voting at elections and referendums; an elector can vote in person at a polling station, they can also vote by post or by appointing a proxy to vote on their behalf. West Suffolk Council actively promotes postal voting as being an easy and convenient way of voting for those that do not want to vote at a polling station and ultimately it is up to voters to choose the most convenient way for them to vote.

1.2 Arrangements for providing places for electors to vote at are set out in legislation and under the Representation of the People Act 1983, the Council has a duty to divide its area into polling districts and to designate a polling place for each district.

The following definitions may help to explain the requirements:

- “Polling districts” are geographical electoral areas into which wards and constituencies may be sub-divided.
- “Polling places” are the buildings or areas designated by the council where electors in a polling district go to vote in person.
- “Polling stations” are the number of issuing desks in the building or area that is the designated polling place.

1.3 The Electoral Administration Act 2006 requires all local authorities in Great Britain to review their polling districts and polling places at least once every five years.

1.4 At its meeting on 26 September 2023 West Suffolk Council agreed to undertake an interim review of polling places, as set out in section 2 of Report number: COU/WS/23/016.

2. Proposals within this report

2.1 The draft schedule of polling districts and polling places, which was included at Appendix A to Report COU/WS/23/016, detailed the current arrangements for polling districts and polling places and comments relating to areas which were considered as part of this review. The outcomes of the areas reviewed are detailed below.

Accessibility

2.2 To ensure compliance with the Elections Act 2022 and the Equalities Act 2010 the Council should seek to ensure that all electors have reasonable facilities for voting as are practicable in the circumstances; and ensure that so far as is reasonable and practicable, every polling place is accessible to electors who have a disability.

- 2.3 The feedback gathered following the May 2023 elections identified some polling stations which may not provide electors with reasonable facilities for voting or are not accessible to electors who are disabled.
- 2.4 With regard to accessibility of polling places, it should be noted that West Suffolk Council undertook an interim review of polling districts and polling places in 2022 and several polling places were changed on grounds of accessibility. The decision to change the polling place for Westley was appealed by the Parish Council and the appeal was considered by the Electoral Commission. The appeal was recently dismissed by the Electoral Commission and the report, which is included under the 'background documents' section provides detail of their investigation and response to all issues that were raised by the Parish Council. The Commission supported West Suffolk Council's processes and decisions in respect of all issues that were raised.
- 2.5 In line with the changing legislation and in light of feedback from the May 2023 elections, several polling places were assessed in relation to accessibility during this review and the outcome of the assessments are detailed in table one below.

Table one

Polling Place	Comments
Nowton Village Hall	Enquiries made regarding accessibility for wheelchair users. Confirmation received that an entrance with a ramp is available. No further assessment or change required as part of the review.
St Mary's Church (Denham)	Site visit undertaken to assess the accessibility of the venue for disabled users. Change of polling place required as St Mary's Church does not have adequate facilities for disabled access due to large internal steps, the internal and external lighting being insufficient and there are not sufficient welfare facilities for staff due to no running water, toilet facilities and, at the time of visit, a known rodent issue too.
St Andrew's Church (Great Saxham)	Enquiries made regarding accessibility for wheelchair users. Confirmation received that a shallow ramp is available providing access for wheelchair users. No further assessment or change required as part of the review.
Herringswell Village Hall	Site visit undertaken to assess the accessibility of the venue for disabled users. Level access is available to the polling station via a disabled access entrance. No further assessment or change required as part of the review.
St Catherine's Church, (Flempton)	Site visit undertaken to assess the accessibility of the venue for disabled users. A ramp is available to access the polling station and additional lighting will be provided for the path to the polling station. No further assessment or change required as part of the review.
The Old School Hall, Icklingham	Enquiries made regarding accessibility, in particular the door width for electors in motorised wheelchairs. Confirmation received from the Village Hall to confirm door width size which meet the requirements for accessibility. No further assessment or change required as part of the review.

Polling Place	Comments
Thelnetham Village Hall	Enquiries made regarding accessibility, in particular the level access and door width. Confirmation received from the Village Hall to confirm door widths, which meet the requirements, and the purchase of additional ramps for internal steps. No further assessment or change required as part of the review.

Change of polling place

2.6 Changes of polling place are proposed for the following reasons:

- future availability of venues
- alternative venues proposed and assessed during the consultation period; and
- accessibility

2.7 The proposed changes are detailed in table two below.

Table two

Current Polling Place	Proposed Polling Place	Comments
St Mary's Church (Denham)	Barrow Village Hall	<p>Current polling place at St Mary's Church is not accessible as detailed at Table one. An alternative facility in the polling district could not be identified and it is proposed that we combine with a polling station in the neighbouring polling district of Barrow. This is part of the same Parish Council and is where the Parish Council meetings for Barrow cum Denham Parish Council are held.</p> <p>It is acknowledged that changing the polling place to the proposed location would arguably make it more difficult for people within the village who are unable to drive or walk to the new venue. However, it should be noted that Denham has very few facilities within the village itself with no post office, shop or public house within walking distance and it is likely that those living in Denham would have to travel a short distance using a car or some other means of transport to access those services. Whilst it is preferable that electors are able to walk to their polling places, it is unrealistic to expect all polling places to be accessible by foot, by all electors, particularly in rural areas. In areas where residents may expect to need transport to access basic amenities it is reasonable for polling places to be situated where accessible only by transport. Subject to approval of the proposed polling places, officers will write to all electors with a change of polling place to advise them of the change and will invite them to apply for a postal vote if they wish.</p> <p>This change will future proof our polling arrangements and provide better accessibility for all electors. If improvements are made at St Mary's Church then the</p>

Current Polling Place	Proposed Polling Place	Comments
		<p>venue could be reconsidered as part of a future review and further contact will be made to signpost to potential funding opportunities to make improvements.</p> <p>Proposal to change was not supported by the ward member or a parish councillor but alternative options were not put forward for consideration.</p>
Brandon Day Centre	Brandon Heritage Centre	<p>The current polling place for Brandon East is allocated as the Brandon Day Centre and it is proposed that this polling place is changed to The Heritage Centre which has been assessed and provides adequate and accessible facilities for polling. The reason for the proposed change is due to the car parking near to the Brandon Day Centre as we have received negative comments and observed issues at previous elections regarding the parking being limited. The Town Council responded to support this proposal.</p>
Unity Schools Partnership Offices (Haverhill)	To be confirmed	<p>The Unity Schools Partnership Offices, as the current polling place, is very unlikely to be available for future use as the site is being sold. An alternative facility in the polling district could not be identified and it is proposed that we combine with a polling station in a neighbouring polling district. Further assessments are required to determine the suitability of two proposed venues (Cadet Centre and Rugby Club) to accommodate a second polling station.</p>
Horringer Court Middle School (Bury St Edmunds)	West End Home Guard Club	<p>The Horringer Court Middle School has closed and the venue is not available for future use as a polling station. An alternative facility in the polling district could not be identified and it is proposed that we combine with a polling station in a neighbouring polling district. The West End Home Guard Club has been assessed and is suitable to accommodate a dual polling station. The Westgate Primary School, which is also in a neighbouring polling district, was considered but the Department for Education/Cabinet Office advice is to avoid using schools where it is practically possible to do so.</p>

2.8 Authorisation is requested for the Chief Executive to amend the scheme of polling places for Haverhill West Ward following completion of the necessary assessments at the Rugby Club and the Cadet Centre. This amendment will be made in consultation with the relevant ward members.

2.9 Subject to approval of the proposed polling places, officers will write to all electors with a change of polling place to advise them of the change and will invite them to apply for a postal vote if they wish.

Electorate forecast

- 2.10 An electorate forecasting exercise was undertaken for 15 polling districts which were identified as being close to the Electoral Commission guidance limit of 2250 per polling station.
- 2.11 The polling district "Bury St Edmunds (Moreton Hall) 2" exceeds the limit and whilst it would be possible to split the polling district streets alphabetically between two polling stations in the same venue, it is instead proposed that the polling district boundaries are reviewed to determine if an additional polling district may be required.
- 2.12 Authorisation is requested for the Chief Executive to amend the polling district boundary for Moreton Hall in consultation with the relevant ward members.

Change of polling district prefix

- 2.13 30 polling districts will have a change of their polling district prefix to reflect the change of constituency for their area. For example, the first letter of the prefix will change from W to B to reflect the change from West Suffolk constituency to Bury St Edmunds constituency at the next UK Parliamentary General Election.
- 2.14 It should be noted that if a parliamentary by election is called in the meantime, it would be run on existing boundaries and the Register of Electors will reflect both the existing and new constituencies.

Delegated decision making

- 2.15 The designation of polling districts and places is a function of the Council, whereas decisions about polling stations are for the Returning Officer.
- 2.16 The Council's Constitution identifies the determination of polling district reviews as a matter to be reserved for full Council. In certain situations, it might not be practicable to await formal Council approval to designate a polling place – for example, where a building becomes unavailable at short notice due to unforeseen circumstances. Due to the potential need to identify alternative locations as polling stations as a matter of urgency, it is recommended that the authority to re-designate polling places be delegated to the Chief Executive.
- 2.17 This delegation is only to be exercised where a decision is required at short notice, and it is not possible to await a decision of Council. The decision should be made in consultation with relevant ward members.

3. Other considerations

- 3.1 A consultation response was received from an elector regarding the location of the polling place at Bury St Edmunds Leisure Centre and the journey to the polling station by car requiring the elector to drive out of the polling district and then back in again. The elector suggested the potential to use local schools and also commented on poor signage at the polling station, which can be addressed at a future election. Contact was made with King Edward VI school to enquire about the availability of use as a polling station and they advised that they would not be able to facilitate a polling station without closing part of the school. No change has been proposed as part of this review.
- 3.2 A consultation response was received from Councillor Pat Hanlon which commented on the turnout at the New Croft (Haverhill) polling place when compared to the turnout at a polling station in a neighbouring polling district. Councillor Hanlon suggested that this may be related to the ANPR car park charges in place at The New Croft, which are turned off on polling day, and whether this puts people off voting. Councillor Hanlon suggested Samuel Ward Academy as a potential alternative. Enquiries were made but unfortunately the school cannot offer us a room which is separate from the rest of the school. No change is proposed as part of this review and additional communication activity will take place ahead of an election to ensure electors are aware that car park charges are not in place on polling day.
- 3.3 The current polling place for Brandon Central is allocated as the Royal British Legion and following the May 2023 elections communication was received regarding the potential to use The Church Institute as a polling place. The Church Institute was assessed and provides adequate and accessible facilities for polling. The suggestion of changing the polling place was consulted on and Brandon Town Council responded to suggest that the Royal British Legion is the better option and should continue to be the polling place. No change has been proposed as part of this review.

4. Consultation and engagement

- 4.1 Consultation with stakeholders was carried out with those groups with an interest in the review and proposed changes and this included:
- Local government electors/residents of the district
 - Parish and town councils
 - Parish meetings
 - District councillors
 - County councillors
 - Members of Parliament

- Residents Associations
- Local public and voluntary organisations
- Local disability groups
- Polling place venues

4.2 Information about the review, including maps with boundaries and polling places detailed, was published on the Council’s website and parish and town councils and local groups were encouraged to make information available where facilities were available. Press releases and social media was also issued.

4.3 A total of 22 responses were received from the consultation and a summary of the responses are included at Appendix B. All responses have been published in full on the consultation page on the Council’s website.

5. Risks associated with the proposals

5.1 If the review is not completed then the Council will breach the requirement of the Representation of the People Act 1983.

5.2 If suitable polling districts are not in place and suitable venues are not secured for use as polling stations, then voters may be disenfranchised and there is a risk of an election petition.

5.3 If polling station venues are not accessible to disabled electors, then this may be a breach relating to accessibility under the Equalities Act 2010 and the Election Act 2022.

6. Implications arising from the proposals

6.1 Legal compliance: The process for a polling district and places review is set out in Schedule A1, Representation of the People Act 1983.

7. Appendices referenced in this report

7.1 Appendix A – schedule of polling districts and polling places

7.2 Appendix B – Consultation summary

8. Background documents associated with this report

8.1 Report number: COU/WS/23/016 - [Agenda for Council on Tuesday 26 September 2023, 7.00 pm \(westsuffolk.gov.uk\)](#)

- 8.2 Electoral Commission guidance - [Reviews of polling districts, polling places and polling stations | Electoral Commission guidance](#)
- 8.3 Record of decision of the Electoral Commission Appeal against the closure of the polling place at the Westley Club - [Councillors - Record-of-decision-of-the-Electoral-Commission-in-the-appeal-against-the-closure-of-the-polling-place-at-Westley.pdf - All Documents \(sharepoint.com\)](#)
- 8.4 Review of Polling District and Polling Places Consultation webpage - [Review of Polling Districts and Polling Places 2023 \(westsuffolk.gov.uk\)](#)