

## **Council**

**24 January 2024**

### **Review of Polling Districts and Polling Places**

Portfolio Holder: Councillor Vince Maple, Leader of the Council  
Report from: Richard Hicks, Chief Executive/Returning Officer  
Author: Jane Ringham, Head of Elections and Member Services

#### **Summary**

This report recommends a revised schedule of polling districts and polling places to reflect the new Parliamentary constituency boundaries that will come into place for the next General election and comments made after the Local and Parish elections in May 2023, and updates the Council on the likely allocation of polling stations by the Returning Officer in preparation for the Police and Crime Commissioner elections scheduled for 2 May 2024.

#### **1. Recommendations**

- 1.1 The Council is requested to:
- 1.2 Approve the scheme of Polling Districts and Polling Places as set out in Appendix 1 to the report, in respect of Parliamentary elections and to designate the Parliamentary Polling Districts and Polling Places as the Polling Districts and Polling Places for Local Government elections.
- 1.3 Note the designation of all polling stations recommended by the Returning Officer as set out in Appendix 2 to the report.
- 1.4 Authorise the Chief Executive in conjunction with the Informal Working Group on Polling Districts and Polling Places to designate a Polling Place where no suitable polling station is available within the original Polling Place.
- 1.5 Note that the Chief Executive will consult with the Informal Working Group on Polling Districts and Polling Places if it is necessary to change any polling stations prior to the elections on 2 May 2024.

#### **2. Budget and policy framework**

- 2.1 The duty to divide Medway into polling districts is a matter that cannot be determined by Cabinet under the Local Authorities (Functions and

Responsibilities) (England) Relegations 2000 (as amended). Therefore, this is a matter for Council.

### 3. Background

- 3.1 Under the Representation of the People Act 1983, the Council has a duty to divide Medway into polling districts and to designate a polling place for each district for UK Parliamentary elections. It also has to keep these arrangements under review. It is good practice to undertake the same exercise for local government elections and in doing so, every effort must be made to ensure that the polling district scheme mirrors as closely as possible that agreed for Parliamentary elections. With the implementation of new Ward arrangements for the Local & Parish elections in May 2023, it is necessary to review all polling districts and polling places.

#### **Polling districts**

- 3.2 A polling district is a geographical area created by the sub-division of a UK Parliamentary constituency for the purposes of a UK Parliamentary election.
- 3.3 In England, each parish is to be a separate polling district. This means that a parish must not be in a polling district which has a part of either a different parish within it, or any un-parished part of the local authority area within it, unless special circumstances apply. Those special circumstances could arise if, for example, the parish has only a small number of electors and it is not practicable for the parish to be its own polling district.
- 3.4 When a parish or community is not a separate polling district the special circumstances and the recommendation resulting from these should be clearly set in the review document for the Council or relevant committee to consider.

#### **Polling places**

- 3.5 A polling place is the building or area in which polling stations will be selected by the (Acting) Returning Officer. A polling place within a polling district must be designated so that polling stations are within easy reach of all electors from across the polling district.
- 3.6 Some authorities designate the entire polling district as the polling place. However, Section 18B(4)(e) of the RPA 1983 states that 'the polling place must be small enough to indicate to electors in different parts of the district how they will be able to reach the polling station'. The Electoral Commission consider that polling places should always be defined more specifically than simply the polling district - for example, by designating the name of the polling place (normally a particular building or area and its environs).

#### **Polling stations**

- 3.7 A polling station is the room or area within the polling place where voting takes place. Unlike polling districts and polling places which are fixed by the

local authority, polling stations are chosen by the relevant Returning Officer for the election.

- 3.8 When assessing the suitability of a room or area for use as a polling station, the (Acting) Returning Officer should consider how the size and layout would allow for the most effective throughput of voters, including in those instances where there is a high number of electors in the polling station at any one time on polling day. Each polling station should be designed to provide suitable conditions for the elector to vote in private, for staff to conduct elections in an efficient and effective manner and for those entitled to observe the voting process to do so without compromising the secrecy of the ballot.
- 3.9 When designating polling districts, Local authorities must comply with the following legislative requirements:
- (a) each parish in England is to be a separate polling district, unless special circumstances apply
  - (b) the Council must designate a polling place for each polling district, unless the size or other circumstances of a polling district are such that the situation of the polling stations does not materially affect the convenience of the electors
  - (c) the polling place must be an area in the district, unless special circumstances make it desirable to designate an area wholly or partly outside the district (for example, if no accessible polling place can be identified in the district)
  - (d) the polling place must be small enough to indicate to electors in different parts of the district how they will be able to reach the polling station
  - (e) the Council must seek to ensure that all the electors in the Constituency have such reasonable facilities for voting as are practicable in the circumstances.
  - (f) seek to ensure that so far as is reasonable and practicable every polling place for which it is responsible is accessible to electors who are disabled. Where a polling place has been selected that is not fully accessible, then reasonable adjustments must be undertaken to provide access for all electors.
  - (g) The Council must have regard to the accessibility to disabled persons of potential polling stations in any place which it is considering designating as a polling place or the designation of which as a polling place it is reviewing.
- 3.10 Under Section 16 of the Electoral Administration Act 2006 the Council must undertake a review of polling districts and polling places every 4 years at a minimum. The Electoral Registration and Administration Act 2013 introduced the timing of compulsory reviews of Parliamentary polling districts and polling places which must be started and completed within the period of 16 months that starts on 1 October of every fifth year after 1 October 2013. The last formal review was undertaken in 2018 and reported to Full Council in January 2019. Practice at Medway has been for an informal review of the scheme of polling districts and polling places to be undertaken and for the

Returning Officer to conduct an informal review of the allocation of polling stations after each election.

- 3.11 This report recommends a revised schedule of polling districts and polling places that reflects the Parliamentary constituency boundaries that will come into effect for the next General election. The Parliamentary Boundary review was based on the Wards that were in effect in 2020. Some other changes to the polling districts are being recommended to take into account feedback from Councillors about the polling stations that were used at the Local and Parish elections in May 2023 and should improve the distances travelled by voters. An informal cross-party working group of Members has been established and they undertook a comprehensive review of the polling districts and polling places. Their recommendations, along with the comments of the Returning Officer are included in Appendix 1 to the report. The Working Group comprises Councillors Hubbard, Lammas, Mahil, Maple, McDonald, Sands and Wildey.

#### 4. The review

- 4.1 The informal working group represents all three political Groups on the Council and the views of all Councillors were sought on the effectiveness of the polling stations used in May 2023. Generally feedback on the 2023 polling stations was favourable and generally the proposals are to implement arrangements to resolve comments and are made after site visits from staff in electoral services to confirm the suitability of any new polling places.
- 4.2 As well as the legislative requirements set out in the earlier paragraphs of this report, the Working Group also agreed a set of principles which it used in its deliberations which are based on Electoral Commission guidance and good practice. These are set out in Appendix 1.

#### **New Parliamentary constituency boundaries**

- 4.3 The Parliamentary Constituencies Order 2023 has now been made and the changes it makes will come into effect when the next General Election is called. Since that election is likely to be called with as little as 35 working days' notice, the Electoral Registration Officer (ERO) has indicated that he will publish a revised register showing the new boundaries on 1 February 2024. When the informal working group undertook its review of polling districts and polling places in 2022 it was necessary to use the existing parliamentary boundaries as they are the ones in force at that time. However, where the new ward boundaries were not coterminous with the then existing parliamentary boundaries, the working group recommended, and Full Council approved, a separate polling district for the parts that straddled the constituencies. When the working group undertook their latest review they were able to readily review a reconfiguration of those polling districts to reflect the agreed new parliamentary constituency boundaries. There is one main change, with the old ward of Rochester South & Horsted being moved from the constituency of Rochester & Strood (R&S) to the constituency of Chatham

& Aylesford (C&A). The changes only affect a handful of new wards and can be summarised in the table below:

#### **FORT HORSTED**

Existing polling district	Comments	New polling district
RFH1	Becomes C&A – rename	CFH1
RFH2	Becomes C&A. Merge with CFH3 and rename	CFH2
CFH3	Merge with RFH2	None

#### **FORT PITT**

Existing polling district	Comments	New polling district
RFP1	Remains R&S	RFP1
CFP2	Remains C&A	CFP2
RFP3	Becomes C&A – rename	CFP3
RFP4	Becomes C&A - rename	CFP4
CFP5	Remains C&A. Can be merged with new CFP3	Merged with CFP3
CFP6		
CFP7		

#### **ROCHESTER EAST & WARREN WOOD**

Existing polling district	Comments	New polling district
RREW1	Remains R&S	RREW1
RREW2	Remains R&S. Move part of RREW3 above St Luke's Church, City Way into RREW2	RREW2
RREW3	Most of polling district becomes C&A. Move part above St Luke's Church, City Way to RREW2 and rename remainder	CREW3

#### **WAYFIELD AND WEEDS WOOD**

Existing polling district	Comments	New polling district
RWW1	Becomes C&A. Merge with CWW2 and rename	CWW1
RWW3	Becomes C&A. Merge with CWW4 and rename	CWW2

#### **All Saints ward**

- 4.4 The Ward Councillor suggested that the polling station for voters in polling district RAS1 was some distance from voters living in the northern part at Kingsmead Park and that as a significant proportion of the residents were elderly and therefore might struggle to get to the polling station. After a site visit by officers to confirm its suitability, the Working Group are recommending that the polling district is split into two separate areas along Avery way and associated roads north of Allhallows Primary Academy school, and that those

voters in the northern part be allocated to Cross Park Pavilion, and voters in the southern part allocated to vote at Allhallows Village hall.

4.5 Allhallows Village Hall, Stoke Road was used as the polling stations for voters in polling district RAS4 at the Local elections in May 2023 due to the previous polling station becoming unsuitable due to refurbishment works. However, feedback was received that Allhallows Village Hall was not the best location for voters in this area as it was not on a usual route. The Working Group heard from officers that there were no other suitable premises in the polling district and therefore the Working Group are recommending that voters are allocated to High Halstow Recreation Hall, The Street. Although this is in Hoo St Werburgh & High Halstow ward, the premises are used by the local Parish Council for its meetings and would seem to be more convenient for voters.

4.6 The result of these changes would be that the polling districts in the Ward would be relabelled as follows and the Returning Officer has confirmed he is happy with these arrangements.

<b>Revised polling district</b>	<b>Changes</b>	<b>Suggested polling station</b>
RAS1	Divided into two. Upper half becomes RAS1	Cross Park pavilion, Cross Park Country Park, off Avery Way, ME3 9QJ
RAS2	The lower half of what was RAS1	Allhallows Village Hall, Stoke Road, ME3 1PE
RAS3	Was RAS2	Grain Village Hall, Chapel Road, Isle of Grain, ME3 0BQ
RAS4	Was RAS3	Stoke Village Hall, Mallard Way, Lower Stoke, ME3 9ST
RAS5	Was RAS4	High Halstow Recreation Hall, The Street, High Halstow, ME3 8SQ

### **Luton ward**

4.7 The voters in polling district CLUT1 were allocated to vote at Goodly Speak Church, 2C Luton Road for the first time at the Local elections in May 2023. However, feedback from Ward Councillors, polling station staff and voters indicates the space available and the lighting were insufficient and the lack of nearby parking and its location right by Luton Arches was inconvenient for voters as well as made delivery and collection of polling station equipment a significant challenge.

4.8 Officers looked at several alternative buildings and options to reconfigure the polling districts so that the existing polling stations apart from Goodly Speak church, could be utilised, but none of the buildings were suitable and no reconfiguration could be devised that was acceptable in terms of the numbers of electors allocated to each polling station. Therefore the Working Group is recommending that voters are allocated to the Maynard Room at St Paul with All Saints Church, Magpie Hall Road. The church hall which is used by voters in Chatham Central & Brompton ward. However, there is no other alternative building in Luton ward and voters in the area are used to voting at the Church

as they used to be allocated there prior to the ward boundary changes. The Returning Officer has confirmed that he is content with this arrangement.

### **Rochester West & Borstal ward**

- 4.9 Voters in polling district RRWB1 were allocated to vote at the Princes Hall, Corn exchange for the Local elections in 2023. Although this was outside the polling district, no suitable alternative could be identified. It had been hoped that use could be made of the Marketing Suite, Countryside Properties, Rochester Riverside but nothing could be finalised in time for the elections. Access out of the Princes Hall is not ideal for voters with mobility difficulties so officers continued discussions. The Working Group were advised that Countryside Properties are content for the Marketing Suite to be used for future elections and are therefore recommending that voters in the polling district are allocated to vote there in future. The Returning Officer is content with this arrangement.

### **Strood North & Frindsbury ward**

- 4.10 One of the Ward Councillors raised issues about the polling station at Strood Gospel Mission, Brompton Lane for voters in polling district RSNF3 was some distance for those living in the north east of the ward and suggested that Hilltop Primary School might be used, requiring the polling district to be split. However, the school is in Strood Rural ward and had previously been used as a polling station but in line with the Returning Officers commitment to limit the use of schools, Frindsbury Baptist Church, Cliffe Road was used instead. The Church is already used as a double station and is insufficient in size for an increased electorate if those in Strood North & Frindsbury were also to be allocated to vote there. It would be confusing for voters if the School was used as well as the Church and the Working Group did not feel there was sufficient justification to allocate voters to a polling station outside the polling district or Ward. The Working Group are therefore recommending that no changes are made to the polling arrangements for voters in polling district RSNF3.
- 4.11 The Headteacher and Governors at the Rede Court Road site of Abbey Court school as well as another Councillor, have been raising concerns for a while about the inconvenience of the school being used as a polling station for voters in polling district RSNF4, particularly since the school site on Clife Road is no longer used as a polling station.
- 4.12 Officers, members of the Working Group and Ward Councillors have not been able to identify suitable alternative premises in the polling district. Options were also considered for a portable building to be installed in the rear school playground but logistically this will not work and the Headteacher indicated that she would still want to close the school to pupils so there would be little benefit of this option, and an increase in costs.
- 4.13 The working Group is therefore reluctantly recommending that voters in polling district RSNF3 continue to be allocated to vote at Abbey Court School on Rede Court Road but that officers also continue to look for alternative

premises as well continuing the dialogue with the school about identifying ways the school could remain open to pupils. The Returning Officer has indicated he is content with these arrangements.

### **Watling ward**

- 4.14 One of the Ward Councillors provided feedback that voters in the north-west part of polling district GW1 had a distance to walk to the polling station at the Sports Centre, Academy of Woodlands and that they preferred the Priestfields Stadium where they used to vote.
- 4.15 Despite several attempts to contact Priestfields to see if they would enable use of either the Great Hall or space in the Business Centre as in the past, they have not been forthcoming. In light of this, and the inability to identify an alternative venue within the polling district, the Working Group is recommending that voters continue to be allocated to the Sports Centre at Woodlands Academy. Officers will continue to establish dialogue with Priestfields but it is unlikely that any change will be put in place for the PCC elections. If Priestfields were to be used, it would result in the polling district being split so that voters in the south east part could continue to vote at Woodlands Academy, and such a decision requires Full Council approval, and the deadline to produce poll card data and maps for the PCC elections will be soon after the Council meeting in January. The remaining schedule of meetings and election timetable would make such a change unfeasible. The Returning Officer has confirmed he is content with this arrangement.
- 4.16 One of the Ward Councillors highlighted that there were access difficulties at Gillingham Golf Club at the Local elections in May 2023, to which voters in polling district GW4 had been allocated to vote. The polling station is on the first floor and unfortunately the lift broke and the front door was not always accessible without having to contact the main office. Officers and Ward Councillors have sought unsuccessfully to identify alternative premises but in the circumstances, officers will discuss the issues with the Golf Club and ensure they do not recur. The Working Group are therefore recommending that no changes are made to the polling arrangements for polling district GW4. The Returning Officer has confirmed that he is content with the arrangement.

### **Hoo St Werburgh & High Halstow Ward**

- 4.17 One of the Ward Councillors suggested that the voters in the new housing developments on northern end of Bells Lane in polling districts RHH2 and RHH4 had long distances to travel to their polling stations at Hoo Village Institute and Hoo Village Hall respectively.
- 4.18 Officers looked for alternative premises closer to the area in question and after site visits to two premises, confirmed that the cafeteria area of Deangate Indoors Bowls Club was suitable and available, albeit that temporary sheeting would be needed to ensure the secrecy of the ballot from the remainder of the Club. Although access by pedestrians is not feasible because there are stretches of the route without a pavement and limited street lighting, the



Working Group are recommending a reconfiguration of the polling districts such that polling districts RHH2 and RHH4 are split along Knights Road and Paddock Drive to form a revised polling district so that voters in the northern parts of both polling districts vote at Deangate Ridge but that the situation is reviewed after the PCC elections to take into consideration any feedback.

- 4.19 The reconfigured polling districts can be summarised as shown in the table below and the Returning Officer has confirmed he is content with the arrangements:

<b>Revised polling district</b>	<b>Description</b>	<b>Proposed polling station</b>
RHH1	Existing polling district RHH1 unchanged	High Halstow Recreation Hall, The Street, High Halstow, ME3 8SQ
RHH2	Northern parts of existing RHH2 and RHH4	Cafeteria, Deangate Ridge Indoor Bowls Centre, Dux Court Road, Hoo, ME3 8RZ
RHH3	Southern part of existing RHH2	Hoo Village Institute, Main Road, Hoo, Rochester ME3 9AA
RHH4	Existing RHH3	Hoo Ness Yacht Club, Hoo Marina, Vicarage Lane, ME3 9TW
RHH5	Southern part of existing RHH4	Hoo Village Hall, Pottery Road, ME3 9BS
RHH6	Existing RHH5 unchanged	Chattenden Community Centre, Swinton Ave, ME3 8PH

### **Use of schools as polling stations**

- 4.20 For the purpose of taking the poll in England and Wales, the (Acting) Returning Officer is entitled to use free of charge schools maintained or assisted by a local authority as well as those schools that receive grants made out of moneys provided by Parliament. This includes academies and free schools.
- 4.21 However, the Returning Officer has adopted a policy of trying to avoid the use of schools due to the disruption caused to pupils, school staff and carers. Wherever possible, negotiations have been held to try to find arrangements that mean the school can remain open to pupils but more often than not, there remain unresolved safeguarding issues and/or the hall that is suitable as a polling station is where pupils have their lunch/assemblies and other activities so schools usually close to pupils. It should also be noted that increasingly Headteachers are raising their disquiet and upset about closing the school to pupils. This has led, in some cases to school staff being less than co-operative with polling station staff on polling day which makes for an awkward and difficult situation. The Returning Officer has not had to invoke his legislative right to use a school to date.
- 4.22 Over the last few years, the number of schools used as polling stations has reduced from 17 to 10. The Working Group agreed to co-operate with the RO's general policy of avoiding using schools as polling stations where possible.

4.23 At the Local elections in May 2023, the following schools were used:

<b>Polling district</b>	<b>Ward</b>	<b>School</b>	<b>Comments/notes</b>
CCB4	Chatham Central & Brompton	New Road school, Bryant Street, ME4 5QN	No alternative accessible buildings in polling district. School closes to pupils as cannot resolve safeguarding and security issues
CFP2	Fort Pitt	Balfour Junior Academy School, Balfour Road, Chatham, ME4 6QX	No alternative accessible buildings in polling district. School closes to pupils as cannot resolve safeguarding and security issues. Have discussed using sports hall at rear of building but as used for lunch/PE etc it would still result is school closing to pupils for the day.
RFP3		Balfour Infants School, Pattens Lane, Rochester, ME1 2QT	No alternative accessible buildings in polling district. School closes to pupils as cannot resolve safeguarding and security issues
CLOW2	Lordswood & Wayfield	Lordswood School, Lordswood Lane, ME5 8NN	No alternative accessible buildings in polling district. School closes to pupils as cannot resolve safeguarding and security issues
CPP2	Princes Park	Maundene School, Swallow Rise, ME5 7QB	No alternative accessible buildings in polling district. School closes to pupils as cannot resolve safeguarding and security issues
GRN2	Rainham North	Leigh Academy, Rainham, Otterham Quay Lane, ME8 8LU	Sports Hall used and school remained open to pupils
GRSE3	Rainham South East	Rivermead Inclusive Trust, Triple R building, Long Catlis Road, ME8 9TX	No alternative accessible buildings in polling district. School closes to pupils as cannot resolve safeguarding and security issues
RSNF4	Strood North & Frindsbury	Abbey Court Special Secondary School, Rede Court Road, ME2 3SP	No alternative accessible buildings in polling district. School closes to pupils as cannot resolve safeguarding and security issues
RSW4	Strood West	Bligh Infants School, Bligh Way, ME2 2XJ	No alternative accessible buildings in polling district. School closes to pupils as cannot resolve safeguarding and security issues
RWW1/ CWW2	Wayfield & Weeds Wood	Dance Studio, Wayfield School, Wayfield Road, Chatham, ME5 0HH	Dance Studio is separate building to school and additional fencing put in place to avoid public getting onto school site so school stays open to pupils

## Conclusions

- 4.24 Appendix 2 shows the proposed Scheme for polling districts and polling places for the whole of Medway.
- 4.25 The scheme also shows each of the polling stations being proposed by the Returning Officer for the PCC elections on 2 May 2024. The Chief Executive/Returning Officer has given an undertaking that he will consult with the Informal Working Group if it becomes necessary to change the designation of a Polling Place where no suitable polling station is available within the original Polling Place and if it is necessary to change any polling stations prior to the elections on 2 May 2024.

## 5. Risk management

- 5.1 Risk management is an integral part of good governance. The Council has a responsibility to identify and manage threats and risks to achieve its strategic objectives and enhance the value of services it provides to the community. The following table shows any significant risks arising from the matters in this report.

Risk	Description	Action to avoid or mitigate risk	Risk rating
No decision is made or it is delayed beyond 2 May 2024	Out of date Scheme of polling districts and polling places in use for PCC elections on 2 May 2024	Submission of report to Council in January 2024	DII

For risk rating, please refer to the following table:

Likelihood	Impact:
A Very likely B Likely C Unlikely D Rare	I Catastrophic II Major III Moderate IV Minor

## 6. Consultation

- 6.1 As required by the legislation, a notice about holding the review has been published on the Council's web pages seeking views on the existing schedule as well as the proposed one. The views of all members have been sought. Any comments received by the time of the finalisation of this report have been referred to in the report where appropriate and made available on the web pages. The Council's final decision on the schedule will also be published.

## 7. Climate change implications

- 7.1 [The Council declared a climate change emergency in April 2019](#) - item 1038D refers, and has set a target for Medway to become carbon neutral by 2050.

7.2 As far as possible, the working group have attempted to allocate voters to polling stations within walking distance to reduce the need to use cars.

## 8. Financial implications

8.1 The costs of Parliamentary elections (General), Police and Crime Commissioner elections and national Referendums are recharged to the Government. The Council meets the costs of local and Parish elections. In terms of costs of schools and other public buildings, only costs for the additional heating, lighting and caretaking costs can be charged; other private premises are subject to a hire cost which varies considerably. The total average cost of polling stations for a full election is in the order of £30,000 depending on if they all submit invoices. The average cost is affected by the high cost of providing a portable building, generator and associated equipment at one venue. The proposals in this report would not increase the costs significantly. A contribution to an Elections Provision is made each year from revenue so that funds are available to cover the costs in the year that Local and Parish elections actually fall. It is anticipated that the Provision will cover the cost of the changes in this report but this will not be known for certain until quotes are obtained nearer to 2027.

## 9. Legal implications

9.1 Section 2 of the report sets out the legal responsibilities and duties of the Council and the Returning Officer for conducting this informal review of the scheme of polling districts and polling places and the review of polling stations.

### Lead officer contact

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### Appendices

Appendix 1 – Principles of review

Appendix 2 – Polling District and Places Schedule – Parliamentary and Local Elections

### Background papers

None