

**REGULATORY SERVICES COMMITTEE
POLLING PLACE REVIEW
(Report of the Returning officer)**

1 Summary

1.1 This report summarises the outcomes of the statutory review of the Polling Places in the Three Rivers area.

1.2 In December 2013, Council delegated to the Regulatory Services Committee the approval of Polling Districts and Polling Places in respect of the District and Parish Wards. (Minute RG20/13 and CL59/13 [Regulatory Services] refer).

2 Details

Background

2.1 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 be helpful when reading this report.

- “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.

2.2 The Electoral Administration Act 2006, as amended, introduced a duty on all local authorities in Great Britain to review their polling districts and polling places at least once every five years.

2.3 Under section 18C of the Representation of the People Act 1983, local authorities are required to complete a compulsory polling place review within a 16-month window between 1 October 2023 and 31 January 2025.

2.4 The intention of the legislation was that reviews would be completed by the January before a UK parliamentary general election. However, since the repeal of the Fixed Term Parliaments Act 2011, there is no longer any certainty as to when the next general election will be.

2.5 The Dissolution and Calling of Parliament Act 2022 means:

- the UK Parliament can be dissolved by the King on request of the Prime Minister, at any time within the 5 years of the life of the Parliament
- the next general election must take place before Tuesday 28 January 2025, but it could happen at any point before then
- there is no longer a link between the timing of the compulsory polling district and places review falling in a 16-month period ending 3 months before a scheduled general election.

2.6 In addition, the Boundary Commission for England has recently completed a review of parliamentary constituency boundaries and the Order for the new parliamentary constituency boundaries were made on 1 November 2023.

Purpose of Review

2.7 The intention of a polling place review is to ensure that:

- All electors have access to reasonable facilities for voting, taking the individual circumstances of the area into consideration
- Every polling place is accessible to electors who are disabled, so far as is reasonable and practicable
- Each polling district boundary does not cross over an existing parish (or parish ward) boundary, but large parishes (or parish wards) can be split into several polling districts if it is a large area
- Each polling place should be within the boundary of the polling district, unless in special circumstances. For example, there is no suitable building or area within the boundary.
- Each polling place should be specific enough that it is clear to voters in the polling district how they will be able to reach it.

2.8 Wherever possible any recommendations should seek to ensure that:

- No more than 2250 voters are allocated to one polling station without other mitigations in place (such as increased staff present) as per Electoral Commission guidelines
- Using schools is minimised
- Using temporary polling stations (such as Portakabins) is minimised

2.9 It should be noted that the Authority has no power to make changes to ward boundaries or names as part of the review process, as this can only be done by the Local Government Boundary Commission for England as part of an electoral review. Consequently amending the boundaries of parishes, borough wards or parliamentary constituencies was outside the remit of this review.

2.10 Electoral Commission guidance was followed in conducting the review this sets out that the following criteria should be taken into account when assessing and reviewing polling places:

- Location: Is it reasonably accessible within the polling district? Does it avoid barriers for the voter such as steep hills, major roads, rivers, etc.?
- Are there any convenient transport links?
- Size: Can it accommodate more than one polling station if required?
- If multiple polling stations are required, is the polling place capable of accommodating all voters going into and out of the polling stations, even where there is a high turnout?
- Availability: Is the building readily available in the event of any unscheduled elections? Is there any possibility that the building may be demolished as part of a new development?
- Accessibility: Is the building accessible to all those entitled to attend the polling place?

2.11 These criteria were fully considered in developing proposals for amendments to polling districts and polling places. For some polling districts there are few suitable venues available for use as polling places, and these may not fulfil all of the criteria listed above. In these cases, the Council has considered a balance between the

quality of the building (access, facilities etc.) and the proximity of the building to the elector.

Overview of Current Polling Places

- 2.12 The district is currently divided into 13 polling districts, which are served by 38 polling places and 58 polling stations. At parliamentary elections these numbers are increased due to the inclusion of a small 'take-on' area from Dacorum Borough Council in our parliamentary boundaries; however the polling places in this 'take-on' area are managed by Dacorum Borough Council and they were not considered as part of this review. A full list of Three Rivers Polling Districts and Polling Places can be found at Annex 1.
- 2.13 Our current polling stations are a mix of church halls, community centres, schools and three temporary marquees (these latter are located at Moor Park, Oxhey Hall and Primrose Hill).

Methodology of Review

- 2.14 The Notice of the statutory review was published on Monday 2 October 2023 and the public consultation ran for a six week period until 10th November 2023. The consultation was publicised on the Council's website, notice boards, and social media channels as well as through the Parish councils. With those wishing to submit responses being encouraged to do so through an online form.
- 2.15 Respondents were not only asked for their views on the current provision of polling stations but were also asked to suggest potential alternative venues that might be considered in the event that they felt that a polling place was unsuitable.
- 2.16 At the end of the consultation period a total of 111 people had viewed the consultation pages on the Council's website, 56 responses had been submitted through the online portal and a further two responses were received by email. A summary of the responses can be found attached to this report as Annex 2.

Use of Schools as Polling Places

- 2.17 Across the District, four schools currently provide accommodation for polling stations. These are:
- Arnetts Hill School (Rickmansworth Town and Penn & Mill End)
 - Coates Way School (Leavesdon)
 - Eastbury Farm School (Moor Park & Eastbury)
 - Woodhall Lane School (Carpenders Park)
- 2.18 Of the responses received to the consultation, the majority of the responses were received from people connected with the schools that are currently used as polling places and Arnetts Hill School in particular (38 responses out of the 56 responses received. One respondent references Coates Way School as their polling station but provided no further details). The responses in respect of Arnetts Hill School expressed concerns about the impact that closing the school for polling day could have on the continuity of their children's education and concern about safeguarding in the event that the school decided to remain open on polling day.

2.19 The Arnetts Hill School Polling Station covers two polling districts (CFB and CGB) both of which are almost exclusively residential in nature with few community facilities located within their boundaries. The School itself is located wholly within polling district CFB with the boundary line with polling district CGB following the line of the school grounds.

2.20 As part of the consultation respondents were asked to suggest potential alternative venues for polling stations and in respect of polling districts CFB and CGB the following venues were suggested by respondents:

- Berry Lane Methodist Church
- Chorleywood Social Club, Shepherds Lane
- Mill End Baptist Church, Field Way
- Mill End Community Centre
- Mill End Sports and Social Club, Penn Road
- St John the Evangelist Church, Berry Lane
- Rickmansworth Tennis Club
- William Penn Leisure Centre

2.21 A review of the sites suggested as alternative venues has found that all are outside polling districts CFB and CGB. Of all the alternative venues suggested only one Chorleywood Social Club on Shepherds Lane is located near the boundary of either Polling District, however the boundary is at the most westerly end of the polling district CGB and in a location that would require the majority of voters in polling district CGB to have to travel through the polling district CGA in order to reach their polling station. Furthermore this would not solve the conundrum of providing a suitable alternative polling place for voters in Polling District CFB. It therefore proposed that polling arrangements for polling districts CFB and CGB remain unchanged.

2.22 It is acknowledged that this situation is not ideal and the Elections Team would like to place on record its thanks to the staff and parents of all four schools that are being used as polling places for their ongoing accommodation of elections at the schools in question and would welcome suggestions of any alternative venues that may not be well known in the areas covered by these polling districts.

Use of Temporary Facilities as Polling Places

2.23 In three polling districts, the availability of appropriate premises is either severely restricted or non-existent. Due to this, in Moor Park, Oxhey Hall and Primrose Hill polling districts the Council makes use of marquees to provide temporary accommodation for polling stations. It is recognised that whilst not ideal the use of these temporary structures does mean that all registered electors are able to vote at a location convenient to them. It should be noted that no negative feedback was received in respect of the facilities provided in these locations as part of this review. It is therefore recommended that these facilities continue to be used in these three areas.

Other Concerns Raised

2.24 One respondent raised concerns about the accessibility of All Saints Church Hall on Watford Road citing the fact that there was poor parking provision and a step up to get into the hall. It is recognised that parking in the immediate vicinity of the Church is limited however there is parking available. The step up to the main door of the

hall is also acknowledged however wheelchair access is possible through the fire doors into the main hall and with additional signage this is not considered to be an insurmountable problem.

- 2.25 One respondent noted that the three polling stations in Chorleywood South, St Andrews Church, Bullsland Hall and Heronsgate, were in close proximity to each other leading to potential confusion amongst voters and raised the possibility of rationalising the three polling stations into a single venue. If this suggestion was followed through it would result in a very cramped experience for voters with three (possibly four) polling stations being located in the one building; the number of voters allocated to St Andrews Church alone is 2607. It is accepted that, with an electorate of 207, Heronsgate provides voting facilities for only a small number of voters however relocating the Heronsgate voters to its nearest neighbour geographically, Bullsland Hall, whilst theoretically possible would add an unnecessary layer of complexity to elections because the two polling districts cover different County divisions and different Parish wards. The Heronsgate polling district does however have the same wards and divisions as Maple Cross although this would require Heronsgate voters to have to travel significantly further to vote and would require the provision of an additional polling station in Maple Cross in order to keep within Electoral Commission guidance on voter ratios.
- 2.26 The large geographical area covered by a single polling place at Sarratt Village Hall was also commented upon and the suggestion that it might be advantageous to provide a standalone polling place at Chandlers Cross was made. Sarratt Village Hall provides voting facilities for two polling districts, DBA and DBB; it is located in the District's most rural area with a widely dispersed population and provides an obvious central location for a polling place. Whilst it is accepted that there could be an argument for the provision of a standalone polling place in Chandlers Cross to cover polling district DBB, there are approximately 350 registered voters in the area and analysis of polling data shows that less than 100 people from Polling District DBB voted each year. It should also be noted that no requests have been made by local residents for the provision of a standalone polling place.
- 2.27 The Returning Officer's response to the consultation is attached to this reports at Annex 3

Conclusions

- 2.28 With the exception of the matters outlined above no other concerns were raised in respect of the District's polling places. Consequently it is recommended that the Committee endorse the District's polling provision with no changes.
- 2.29 Notwithstanding the conclusion at paragraph 2.28 it is recognised that identified polling places or polling stations may be unavailable at the time of an election, for example due to refurbishment, fire or flood or if the venue has been pre-booked for another purpose when an unscheduled election is called. Consequently, the Committee is asked to recommend that Full Council delegate authority to the Returning Officer to make any necessary amendments to polling places to enable changes to be made at short notice in such circumstances thus ensuring that the Council is able to deliver its statutory obligations in respect of elections.

3 Options and Reasons for Recommendations

- 3.1 None. The provision of access to reasonable facilities for voting is a statutory obligation.

4 Policy/Budget Reference and Implications

4.1 The recommendations in this report are within the Council's agreed policy and budgets.

5 Financial Implications

5.1 Nothing further to add.

6 Legal Implications

4.1 Legal implications are contained in the main body of this report.

7 Equal Opportunities Implications

7.1 The provision of access to reasonable facilities for voting is a statutory obligation. All venues used as polling places have been assessed for their accessibility and are considered to provide appropriate accommodation for all voters.

8 Risk and Health & Safety Implications

8.1 The Council has agreed its risk management strategy which can be found on the website at <http://www.threerivers.gov.uk>. In addition, the risks of the proposals in the report have also been assessed against the Council's duties under Health and Safety legislation relating to employees, visitors and persons affected by our operations. The risk management implications of this report are detailed below.

8.2 The subject of this report is covered by the risk registers drawn up as part of the planning for every election. Past experience has demonstrated that all the venues used by the District as polling stations are prepared and willing to accommodate polling stations even at short notice. Even if the precise location of the polling station within the building has to be moved to a different room within the building if necessary. In the event that a venue became completely unavailable at short notice and there were no suitable alternative venues in the affected Polling District, the Elections Team has considerable experience in sourcing temporary accommodation suitable for use as a polling station and consequently it is considered that any risks arising from this situation can be managed appropriately.

Nature of Risk	Consequence	Suggested Control Measures	Response <i>(tolerate, treat terminate, transfer)</i>	Risk Rating <i>(combination of likelihood and impact)</i>
Polling Place is unavailable (Likelihood - Low)	Inability to provide suitable polling place will place election at risk (Impact - Critical)	Alternative venues to be identified as a temporary measure. Temporary accommodation	Treat	6

		hired in if necessary.		
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The above risks are scored using the matrix below. The Council has determined its aversion to risk and is prepared to tolerate risks where the combination of impact and likelihood scores 6 or less.

Likelihood Very Likely ----- ↓ Remote	Low	High	Very High	Very High
	4	8	12	16
	Low	Medium	High	Very High
	3	6	9	12
	Low	Low	Medium	High
2	4	6	8	
Low	Low	Low	Low	
1	2	3	4	
Impact Low -----▶ Unacceptable				

Impact Score

4 (Catastrophic)

3 (Critical)

2 (Significant)

1 (Marginal)

Likelihood Score

4 (Very Likely (≥80%))

3 (Likely (21-79%))

2 (Unlikely (6-20%))

1 (Remote (≤5%))

9 Recommendations

9.1 It is recommended that the Committee:

- i. Note the outcome of the Polling Place review consultation
- ii. Endorse the continuation of the current arrangements for polling places.
- iii. Recommend to Council that authority be delegated to the Returning Officer to make any necessary amendments to the polling places to enable changes to be made at short notice in the event that a polling place was unavailable at the time an election is called in order to ensure that the Council is able to deliver its statutory obligations in respect of elections.

Annexes

Annex 1 – Three Rivers Polling Districts and Polling Places

Annex 2 – Summary of consultation responses

Annex 3 – Returning Officer's Response to the Consultation