

Review of Polling Districts and Polling Places

For Full Council on Wednesday 4 October 2023

Report date: 13 September 2023

Summary

Lead Member: Cllr Rob Wormington – Chairman of General Purposes Committee

Lead Director: William Benson – Chief Executive and Returning Officer

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Classification: Public document (non-exempt)

Wards affected: All

| Approval timetable | Date |
|----------------------------|--------------------------------------|
| General Purposes Committee | Virtual consultation, September 2023 |
| Full Council | Wednesday 4 October 2023 |

Recommendations

1. That Full Council agrees to the proposed polling districts and polling places as set out in this report.

1. Introduction and background

- 1.1 The Electoral Registration and Administration Act 2013 requires the Council to conduct a review of the Borough's polling districts and polling places every five years. The Council is also required to keep polling arrangements under review. The last full review went to Full Council on 18 December 2019, and the next full review must be conducted between 1 October 2023 and 28 February 2025.
- 1.3 The Local Government Boundary Commission for England (LGBCE) has recently published its final recommendations for warding arrangements for the Borough. If approved by Parliament, these will take effect from the May 2024 elections. At this stage it is considered highly unlikely that the recommendations will not be approved by Parliament (they may only be accepted or rejected in full, and not amended). Given the need to ensure new polling arrangements are in place ahead of the election, a review of polling districts and polling places needs to start now.
- 1.4 In addition, the new Parliamentary Constituency boundaries have been developed by the Boundary Commission for England and published here: <https://www.bcereviews.org.uk> The new Constituencies will use the current (not new) wards as building blocks. Once published, it is the responsibility of the Government to prepare an order to implement the new Constituencies; they would then take effect from the next Parliamentary General Election thereafter.

2. Definitions

- 2.1 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. Each parish is to be a separate polling district unless there are special circumstances. 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.
- 2.2 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.
- 2.3 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 (Acting) Returning Officer for the election.

3. Requirements of the review

3.1 In conducting the statutory review, local authorities must follow the rules set out in the legislation, which are:

- The authority must publish a notice of the holding of a review.
- The authority must consult the (Acting) Returning Officer in a constituency which is wholly or partly in its area.
- The (Acting) Returning Officer must make representations to the authority which must include information as to the location of polling stations (existing or proposed).
- The local authority must publish the (Acting) Returning Officer's representations within thirty calendar days of receipt, in such manner as is prescribed.
- The authority must seek representations from such persons as it thinks have expertise in relation to access to premises or facilities for persons who have different forms of disability. Such persons must have an opportunity to make representations and to comment on the (Acting) Returning Officer's representations.
- Any elector in a constituency situated in whole or in part in the authority's area may make representations.
- Representations made by any person in connection with a review of polling places may include proposals for specified alternative polling places.
- On completion of a review, the authority must give reasons for its decisions in the review and publish such other information as is prescribed.

3.2 As part of the review process, local authorities must:

- Seek to ensure that all electors in the constituency have such reasonable facilities for voting as are practicable in the circumstances.
- Seek to ensure that as far as is reasonable and practicable the polling places are accessible to those who are disabled, and
- When considering or reviewing the designation of a polling place, have regard to the accessibility needs of disabled persons.

4. Review process

4.1 The timetable for this review is as follows:

- Report and Notice of Review published – 18 July 2023
- Consultation period (six weeks) – 19 July to 1 September 2023
- Updated recommendations circulated to Members of the General Purposes Committee by mid-September
- Final recommendations presented to Full Council – 4 October 2023

4.2 Members are invited to note and agree the following important points:

- (1) The new Register of Electors will be published on 1 December 2023, and will usually be built upon the new polling districts. This ensures that the Register structure is finalised and in place ahead of the May 2024 elections, at which the new ward boundaries will be used. As such, final agreement on the new polling districts must be reached before 1 December 2023.
- (2) If the LGBCE Ward Review is terminated, noting this is highly unlikely, then any proposed polling district boundary and naming changes will be deferred for further refinement.
- (3) This Review of Polling Districts and Polling Places, necessitated by the new warding arrangements, shall also be the review required for Parliamentary election polling arrangements; a separate review will not be undertaken, hence involving a broad range of consultees during this review.

5. Development of draft proposals and consultation process

5.1 Officer-led preliminary review

5.1.1 Officers undertook an initial review, to highlight specific issues ahead of the public consultation. There is no presumption that every polling district will be changed, although any 'no change' decision must be fully justified as part of the overall proposals. This review considered lessons learned and feedback from electors, political candidates, and polling station staff from recent elections.

Polling districts

5.1.2 To accommodate the new parish wards created by the LGBCE Ward Review (in Southborough and Paddock Wood), new polling districts have been proposed. This ensures each parish ward is a separate and distinct polling district. Large parishes, parish wards, and unparished areas in the town centre remain split into more than one polling district, to ensure convenience for electors.

5.1.3 Where polling districts no longer serve a purpose, the proposal is to merge them as appropriate.

5.1.4 Every polling district has a unique code, used in the Register of Electors to uniquely identify individual electors. There are many different options for how letter codes can be determined. Previously, Tunbridge Wells has used letters A-Z, then AA onwards. However, there is the opportunity for letter codes to link directly to the areas they serve – this can make it easier to support electors and

political parties, noting that every code will need to change through this review in any case. The preliminary review therefore highlighted that each polling district should have a three-letter code:

- The first letter determines the new Borough Ward, starting at A (Cranbrook, Sissinghurst and Frittenden) through to P (St John's); letters I and O are excluded to avoid confusion with numbers.
- The second letter determines the polling district within the ward, starting with A for each ward.

Polling places

5.1.5 There are a number of factors which were considered when reviewing the existing polling places or when new polling places were assessed, these include:

- **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 large enough to accommodate all voters going into and out of the polling stations, even where there is a high turnout?
- **Suitability:** 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? Is the building accessible to all those entitled to attend the polling place?

5.1.6 The choice of polling places will often be a balance between the quality of a building (access, facilities etc.) and the proximity of the building to the electors. All factors have been taken into consideration during the preliminary review.

5.1.7 The schedule of delegated authority sets out that Council can determine the location of polling places, that this is also delegated to General Purposes, and that the Returning Officer may also use delegated authority to make changes. Legislation sets out that the Returning Officer may decide to locate a polling station somewhere other than the agreed polling place, without consultation, if necessary and there is insufficient time to consult. For the avoidance of future doubt, the final schedule of polling district and polling place arrangements is proposed to be taken to Full Council on Wednesday 4 October. However, to ensure flexibility when required, given the change in availability of venues often at short notice, each polling place is proposed to be prefixed with 'At or near...' as is usual practice in other local authorities. Thus, the Returning Officer shall place a polling station in the venue identified a polling place, when possible, but is not required to complete a full review if that venue is not available at short notice but another suitable venue is available nearby.

5.2 Consultation process

5.2.1 The initial proposals were sent, as part of the consultation process, to:

- All members of the Council
- Members of Parliament for Tunbridge Wells and Maidstone and the Weald
- The Police and Crime Commissioner for Kent
- Parish/Town Councils
- Members of the County Council
- All political groups who fielded candidates in the most recent Borough Council elections
- The local Access Group

5.2.2 The public consultation ran from 19 July to 1 September 2023.

6. Responses to the consultation

6.1 The Acting Returning Officers (ARO) for each of the constituencies that serve residents of the Borough submitted their responses to the consultation as set out below. These were published alongside the consultation documents on the council's website. Note that the ARO for the Tunbridge Wells constituency is also the Chief Executive of TWBC and therefore the draft proposals were developed in liaison with him.

- Acting Returning Officer for Maidstone and The Weald Constituency (based at Maidstone Borough Council):

“As the Acting Returning Officer, I have considered the outcome of the polling district review and the proposed changes to polling districts within the Borough of Tunbridge Wells as they relate to my constituency area. I agree with the suggested boundaries and polling places for the polling districts. I agree the changes align with the local population and will support elections in the area. As the Acting Returning Officer, I will work with Tunbridge Wells Borough Council to ensure that polling stations are adequately staffed and accessibility is considered when establishing polling stations in the constituency.”

6.2 During the consultation period, Officers visited proposed new venues. As a result, it was determined that the use of the Marketing Suite at the Foal Hurst Green development in Paddock Wood would not be suitable for use as a polling station. It is therefore proposed to use the new Community Centre in Paddock Wood. The new Community Centre is easily able to accommodate three polling stations. Therefore, it is proposed to stop using St Andrew's Church and that both Paddock Wood West (FB) and Paddock Wood South (JE) are allocated to the new Community Centre as a polling place.

- 6.3 Further, Linden Park Cricket Club has been identified as a more suitable venue than St Paul's Church (serving BE: Culverden South) for accessibility reasons.
- 6.4 The current polling place for voters in the new Calverley (HA) polling district (St James Church) is now in a different polling district. Therefore, Officers worked to identify a suitable venue in the Calverley (HA) polling district. The Amelia Scott is within the Calverley (HA) polling district and will become the polling place for voters in that area.
- 6.5 During the public consultation, a total of six additional responses were received. These are included at **Appendix C**. To summarise:
- One respondent fully supported the proposals for Brenchley and Matfield.
 - One respondent felt the ward boundaries were incorrect and proposed a different warding configuration. To be clear, the warding arrangements have been determined by the Local Government Boundary Commission for England (LGBCE) and amending them is outside of the scope of this review.
 - One respondent, echoed by the response from the local MP (**Appendix D**), advocated a new polling station to be placed at Skinners' Kent Academy on the basis that older people living in the Blackhurst Lane and Sandown Park area may face difficulties getting to the current venue (TN2 Community Centre). However, the electorate in that area does not justify an additional polling station given the logistical complexities of adding extra stations. The choice, therefore, becomes whether to move the polling place to Skinners' Kent Academy or to leave it at the TN2 Community Centre. If it were moved, a much greater number of electors would need to travel to Skinners' Kent Academy than currently travel from Sandown Park to the TN2 Community Centre. Whilst the (A)RO is legally able to require the use of schools for use as a polling station, and Skinners' Kent Academy have graciously supported the possibility of being used as a venue, current government guidance is to try to avoid using schools as far as possible. There are occasions and locations where that is not possible, but there is an underlying attempt to reduce use of educational facilities to minimise the impact on students. Whilst the challenges faced by electors in this area are noted, it is considered that in the best interests of most electors in that area, the polling place should remain at the TN2 Community Centre.
 - One respondent felt that polling district JA should be called 'Five Oak Green' to reflect where most electors in the polling district live. The polling place remains in Capel, hence the original name of the polling district. The name of the polling district is immaterial (some local authorities use codes, rather than names, and they are used only for internal reference). However, in the interests of reflecting local identities in the naming of polling districts, the final recommendation includes both Capel and Five Oak Green in the name to

reflect the electorates and geography.

- One submission was a string of letters and not a valid submission. This submission is included in the appendix for completeness only.
- The final response, from the Tunbridge Wells Liberal Democrat Group, provided extensive suggestions and recommendations (included in full at **Appendix E**). These included suggestions for alternative polling district boundaries, alternative polling place locations, and suggestions for alternative naming of polling districts. The suggestions and recommendations are summarised in the table below (pages 9 to 11) with a response.

| Ward | Comment | Response |
|-----------------------------------|--|--|
| Culverden | (1) BA to remain | Polling district BA will remain as per the draft proposals. |
| | (2) Combine BB, BC, and BD, then split into two new polling districts and rename | The total combined electorate is currently 4,643. Splitting into two equally sized polling districts would result in 2,321 per venue; current Electoral Commission guidance is for a maximum of 2,250 per station. Therefore, splitting this area into two polling districts would result in at least one and possibly two dual polling stations (that is, either three or four stations in two buildings). Whilst the cost of venue hire would be a little lower, there would be no corresponding reduction in staffing costs (and a potential increase), and the removal of one polling place would increase travel time and reduce accessibility for voters. On balance, retaining three polling districts is likely to be more beneficial for electors in this town-centre location. |
| | (3) Combine BE and BF then rename to Culverden South | <p>This makes sense and removes the small polling district (BE). The combined polling district will have a polling place at or near Linden Park Cricket Club; and will be renamed to Culverden South.</p> <p>As noted at 6.5 above, the names of polling districts are purely for internal reference. However, this renaming is a legitimate and valuable suggestion.</p> |
| Hawkhurst, Sandhurst and Benenden | (1) Combine DA and DB due to the close proximity of the polling places | In the draft proposals Benenden (DA) was already the merger of two existing polling districts, with a total electorate of around 1,072. The Iden Green polling district has an electorate of around 400 electors. Merging DA and DB would create a single geographically large polling district and increase throughput in a single polling station. Whilst the relatively close proximity of the two polling places may lend itself to combining the areas, doing so may cause problems for electors in Iden Green due to access issues (given it is realistically only accessible by driving). Given this, even though it is a relatively small number of electors who vote in Iden Green, removing pedestrian access for those electors appears unwise. The final recommendation is therefore to retain both Iden Green and Benenden polling districts. |
| | (2) Combine DC and DD due to close proximity of the polling places | Together DC and DD have an electorate of 3,868, so a combined single polling district would necessitate a dual station. Given this, it appears prudent to keep the two polling districts with distinct polling stations to serve the two parts of the parish, rather than combining into a single venue and splitting into a dual station. |

| Ward | Comment | Response |
|-------------------|--|---|
| Pantiles | (1) Combine GB and GC, then redistribute part of GC to GD to regularise the boundary | The boundary between GC and GD does appear irregular on the map, but this is to ensure electors in side roads vote in the same polling place as their nearest neighbours on the main road, and to ensure, as far as possible, entire roads are in the same polling district. Polling district GC has around 2,000 electors; adding any from GB (circa 700) would exceed the maximum number for a single polling station. GD is already also at capacity. Thus, merging GB and GC would create the need for a dual station in one venue. It is easier for electors in GB to vote at St Marks C of E Primary School than to travel into GC (Number One Community Centre). Given this, it appears more viable to retain the two polling districts as per the draft proposal. |
| Park | (1) Merge HA, HB, and HC, then split into two polling districts | Between them these three polling districts have around 4,800 electors; split into two polling districts would result in the need to split polling places into dual stations. It is considered preferable to minimise dual stations as far as possible, making polling places closer to where electors live. |
| Pembury and Capel | (1) Merge JC and JD | Merging JC and JD (the entire of Pembury) would create a single large polling district with a large electorate. There are some areas where this approach is beneficial, such as if there is only one suitable polling place identified. However, both the Pembury Village Hall and Pembury Free Church are suitable premises to be used as polling places. Retaining two polling places also gives scope to further split into dual stations should the need arise (such as increasing electorates and/or complex combined polls). Given this and that neither of the current venues would have sufficient car parking spaces to accommodate all electors from both current polling district, the final recommendation is to keep these as two polling districts. |
| | (2) Identify a suitable alternative for JE (was to be the Marketing Suite at Foal Hurst Green) | This has been resolved, as set out above at 6.2, noting the unsuitability of the Marketing Suite. |
| | (3) Rename JA as Five Oak Green | As noted at 6.5 above, this is proposed to now be called 'Five Oak Green and Capel' to reflect the population base and the polling place location. |

| Ward | Comment | Response |
|-------------------------|---|--|
| Rusthall and Speldhurst | (1) Combined KC and KD | The split of Rusthall into two polling districts was a relatively recent change and was necessitated by the large electorate (around 1,500 in one polling district and over 2,000 in the other). Splitting the electorate into two polling districts has simplified the management of the election and made the voting experience easier for voters. |
| St James' | (1) Combine NC and ND, with the polling place for both at The Hub | Both NC and ND have around 2,100 electors at present, so a combined polling district would require a dual station. The Hub is not suitable for a dual station, given its size. The alternative proposed venue, the Sea Cadets Centre, does not have sufficient parking or step-free access for electors so is unlikely to be suitable. |
| St John's | (1) Combine PA and PB, with one polling place at St Luke's Church | Whilst this proposal would create a single large polling district, it brings the benefit to electors that they would all be voting within the ward, and to elections staff of not having voters in St John's Church voting for two separate wards. Therefore, the final recommendation takes forward this proposal. |

7. Final recommendations

7.1 The final recommendations are shown in the table below (pages 11 to 14).

| Ward | Parish / area | Polling district | Polling place |
|--|----------------------------|---------------------|--|
| Cranbrook, Sissinghurst and Frittenden | Cranbrook and Sissinghurst | AA: Cranbrook | At or near Vestry Hall, Stone Street |
| | | AB: Sissinghurst | At or near Sissinghurst Village Hall |
| | Frittenden | AC: Frittenden | At or near Frittenden Memorial Hall |
| Culverden | N/A | BA: Culverden North | At or near St John's Bowls Pavilion |
| | | BB: Bishops Down | At or near Bishops Down Primary School |
| | | BC: Culverden | At or near 3 Culverden Park |

| Ward | Parish / area | Polling district | Polling place |
|---------------------------------------|-------------------------------|---|---|
| | | BD: Holy Trinity | At or near Trinity Theatre and Arts Centre |
| | | BE: Culverden South Note: combines BE and BF from the draft proposals | At or near Linden Park Cricket Pavilion |
| Goudhurst, Lamberhurst and Horsmonden | Brenchley and Matfield parish | CA: Brenchley | At or near Brenchley Memorial Hall |
| | | CB: Matfield | At or near Matfield Village Hall |
| | Goudhurst parish | CC: Curtisden Green | At or near Goudhurst Village Hall |
| | | CD: Goudhurst | At or near Goudhurst Village Hall |
| | | CE: Kilndown | At or near Kilndown Village Hall |
| | Horsmonden parish | CF: Horsmonden | At or near Horsmonden Village Hall |
| Lamberhurst parish | CG: Lamberhurst | At or near Lamberhurst Memorial Hall | |
| Hawkhurst, Sandhurst and Benenden | Benenden parish | DA: Benenden | At or near Benenden Village Hall |
| | | DB: Iden Green | At or near Iden Green Pavilion |
| | Hawkhurst parish | DC: Hawkhurst | At or near Royal British Legion, High Street, Hawkhurst |
| | | DD: Hawkhurst Moor | At or near King George V Field Sports Pavilion |
| | Sandhurst parish | DE: Sandhurst | At or near Sandhurst Village Hall |
| High Brooms | Southborough parish | EA: High Brooms | At or near St Matthew's Church |
| Paddock Wood | Paddock Wood parish | FA: Paddock Wood East | At or near Day Centre, Dowding House |
| | | FB: Paddock Wood West | At or near Paddock Wood Community Centre |
| Pantiles | N/A | GA: Christ Church | At or near Christ Church, High Street, Tunbridge Wells |
| | | GB: Ramslye | At or near St Mark's C of E Primary School |
| | | GC: Showfields | At or near Number One Community Centre |

| Ward | Parish / area | Polling district | Polling place |
|-----------------------------|-------------------------|------------------------------|--|
| | | GD: St Marks | At or near St Mark's Hall, Bayham Road |
| Park | N/A | HA: Calverley | At or near The Amelia Scott |
| | | HB: Dunorlan | At or near Salvation Army Hall |
| | | HC: Grove | At or near Claremont Primary School |
| | | HD: Hawkenbury | At or near Hawkenbury United Reformed Church |
| Pembury and Capel | Capel parish | JA: Five Oak Green and Capel | At or near Capel Community Centre |
| | | JB: Tudeley | At or near Arnold Cooke Hall, All Saints' Church |
| | Pembury parish | JC: Pembury High Street | At or near Pembury Village Hall |
| | | JD: Pembury Lower Green | At or near Pembury Baptist Church |
| | Paddock Wood parish | JE: Paddock Wood South | At or near Paddock Wood Community Centre |
| | Rusthall and Speldhurst | Speldhurst parish | KA: Langton Green |
| KB: Speldhurst | | | At or near Speldhurst Village Hall |
| Rusthall parish | | KC: Rusthall East | At or near The Rackliff Centre |
| | | KD: Rusthall West | At or near St Paul's Church Centre |
| Sherwood | N/A | LA: Oak Road | At or near St Philip's Day Centre |
| | | LB: Knights Park | At or near Skinners' Kent Primary School |
| | | LC: Sherwood | At or near TN2 Community Centre |
| Southborough and Bidborough | Bidborough parish | MA: Bidborough | At or near Bidborough Village Hall |
| | Southborough parish | MB: Southborough North | At or near St Thomas Church Hall |
| | | MC: Southborough South | At or near Community Centre, Crundwell Road |
| St James' | N/A | NA: Ferndale | At or near St James Church Hall |

| Ward | Parish / area | Polling district | Polling place |
|-----------|---------------|---|--|
| | | NB: Grosvenor | At or near St John's Church Centre |
| | | NC: Camden | At or near St Barnabas Church Hall |
| | | ND: St James | At or near The Hub, Grosvenor and Hilbert Park |
| St John's | N/A | PA: St Johns Note: this combines PA and PB from the draft proposals | At or near St Luke's Church Hall |

8. Implementation

- 8.1 Once approved by Full Council, the final polling districts and polling place arrangements will take effect at the republication of the Register of Electors on 1 December 2023, ahead of the May 2024 elections and new ward boundaries.
- 8.2 Members should note that, if the new ward boundaries do not go ahead, then Full Council will be presented with a revised set of proposals that reflect the current warding arrangements, along with any updated polling place arrangements.

9. Publication of materials

- 9.1 Legislation requires that the council publishes all information relevant to this Review of Polling Districts and Polling Places. The publication of this report, along with the attached appendices and minutes of the General Purposes Committee and Full Council, satisfy this requirement. A copy of these documents will be made available online and at the council offices, in line with both normal practice and the statutory requirements for this review.

10. Cross cutting issues

10.1 Legal

The Electoral Registration and Administration Act 2013 requires the Council to conduct a review of the Borough's polling districts and polling places every five years.

10.2 Finance and other resources

Establishing new polling stations will incur an increased cost with regards to hall hire. However, merging polling districts and using the same venue for more than one polling district will minimise this.

10.3 Staffing

No implications.

10.4 Risk management

Failure to conduct the review would result in a breach of legislation and fail to provide appropriate voting arrangements for electors at future polls.

10.5 Environment (inc. biodiversity) and sustainability

Not relevant to this review.

10.6 Community safety

Not relevant to this review.

10.7 Equalities

Polling places have been determined based on their accessibility for people with visible and invisible disabilities. Staff are trained to support electors as appropriate.

10.8 Data protection

Not relevant, as no personal data is involved in this review.

10.9 Health and safety

All venues are reviewed periodically, and all Presiding Officers are trained in relevant health and safety matters to ensure the ongoing safety of all staff and voters in their venues.

10.10 Health and wellbeing

Not relevant to this review.

Appendices

| Appendix | Title |
|----------|--|
| A | Notice of Review as published |
| B | Draft proposals as consulted upon |
| C | Responses to the consultation |
| D | Response to the consultation |
| E | Response to the consultation |
| F | Maps of the new proposed polling districts |