



Signed off by	Mari Roberts-Wood, Electoral Registration Officer and Returning Officer for Reigate and Banstead
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To	Council
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Key Decision Required	Yes
Wards Affected	Banstead Village; Hooley, Merstham and Netherne; Horley West and Sidlow; Meadvale and St. John's; Nork; Reigate; Redhill East; and, Tattenham Corner and Preston.

Subject	Interim Polling Place and District Review 2023/24
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Recommendations
That the premises and final recommendations set out in Annex 1 be designated the polling places for the polling districts stated with effect from 31st January 2024.
Reasons for Recommendations
To ensure that all electors have reasonable facilities for voting in elections at the forthcoming Borough Council, Police and Crime Commissioner and Parliamentary elections in 2024, according to the rationale provided for each proposed change within Annex 1 to this report.
Executive Summary
Following the Boundary Commission for England's review of the parliamentary boundaries, this interim review seeks to ensure that all electors have reasonable facilities for voting in elections at the forthcoming Borough Council, Police and Crime Commissioner and Parliamentary elections in 2024. The review includes:

- (i) Polling districts, which are the areas created by the division of wards into smaller sections. Within each polling district a polling place can be determined which is convenient to electors.
- (ii) Polling places, which are the locations, normally the buildings, in which polling stations are sited.

The above recommendations are subject to approval by Full Council.

Statutory Powers

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.
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. Reviews must be started and completed within the period of 16 months that starts on 1 October of every fifth year after 2013.
3. Under section 18C of the Representation of the People Act 1983, the next compulsory review must be undertaken within a 16-month window between 1 October 2023 and 31 January 2025.
4. Schedule A1 to the Representation of the People Act 1983 sets out all the steps that must be undertaken to complete a review. Officers have also had regard to guidance published by the Electoral Commission.

Background

Definitions

5. The following definitions may be helpful when reading the report and Appendices.
 - (i) The “Electoral Registration Officer” is the statutory officer responsible for maintaining the electoral register and absent voting arrangements within the Reigate and Banstead electoral area. The Electoral Registration Officer is Mari Roberts-Wood.
 - (ii) The “Returning Officer” is the statutory officer responsible for the management and delivery of elections and referenda within the Reigate and Banstead electoral area. The Returning Officer is Mari Roberts-Wood.
 - (iii) “Polling districts” are geographical electoral areas into which wards and constituencies may be sub-divided. The designation of polling districts is determined by the Council (or by the Electoral Registration Officer under delegated authority where it is impractical to report to the Council).
 - (iv) “Polling places” are the buildings or areas designated by the council where electors in a polling district go to vote in person. The designation of polling places is determined by the Council (or by the Electoral Registration Officer under delegated authority where it is impractical to report to the Council).
 - (v) “Polling stations” are the number of issuing desks in the building or area that is the designated polling place. The arrangement of polling stations is determined by the Returning Officer for the respective election(s).

Timing of the next statutory review

6. The intention of the legislation was 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.
7. The Dissolution and Calling of Parliament Act 2022 means:
 - (i) 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.
 - (ii) the next general election must take place before Tuesday 28 January 2025, but it could happen at any point before then.
 - (iii) 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.
8. In addition, the [Boundary Commission for England has concluded a review of parliamentary constituency boundaries](#). The Commission has now published its final recommendations, and Orders for the new parliamentary constituency boundaries were made on 1 November 2023.
9. Now that the Orders for new parliamentary constituencies have been made, the new boundaries will be used for the next General Election.
10. If a parliamentary by-election is called in the meantime, it would be run on existing boundaries.
11. These issues mean it is important that a polling district and places review is carried out as early as possible, so that the Council has agreed polling districts and places to be used for the next parliamentary election, as well as the scheduled local elections and Police and Crime Commissioner elections on 2nd May 2024 and has a polling scheme in place which reflects the new constituencies.
12. A further review will take place from Autumn 2024 following the conclusion of the [review of Surrey County Council boundaries](#) to comply with the requirement to undertake a statutory review before 31 January 2025, and in readiness for the next scheduled Surrey County Council elections in May 2025. As the final recommendations for the Surrey County Council boundaries have yet to be determined, this interim review does not include the arrangement of future county boundaries.

Interim reviews

13. Local authorities may undertake interim reviews of polling places and districts as required (for example, after the conclusion of parliamentary boundary reviews) to ensure the arrangement of polling places and districts are suitable for any by-elections or scheduled elections in the interim.

Key Information

Methodology

14. Whilst this interim review is not a full statutory review (planned to take place from Autumn 2024, see paragraph 12), it should follow the same steps as a statutory review as referred to in paragraph 4. This includes:
 - (i) Publication of a Notice of the Review and initial proposals arising from a preliminary review conducted by the Electoral Services team ([published on 13 October 2023](#)).
 - (ii) A public consultation (conducted from 13 October – 30 November 2023). Further information is provided under paragraphs 45 - 47.
 - (iii) Consultation of Acting Returning Officers for parliamentary constituencies which overlap with the Reigate and Banstead electoral area. Further information is provided under paragraph 48 and **Annex 3**.
 - (iv) Seek representations from such persons as it thinks have particular expertise in relation to access to premises or facilities for persons who have different forms of disability. Further information is provided under paragraph (v).
 - (v) Preparation of the final proposals to be recommended to the Full Council for approval, as set out within this report under **Annex 1**.

Evidence for consideration

15. This report will consider:
 - (i) The recommended proposals, as set out under **Annex 1**. As no representations seeking changes or proposing alternatives were made during the public consultation from 13 October – 30 November 2023, these are unchanged from the initial proposals published on 13 October 2023.
 - (ii) The completed Electoral Commission template evaluation forms from site visits conducted by the Electoral Services office, provided at **Annex 2**.
 - (iii) Any comments from the Acting Returning Officer with regards to the suitability of polling places and districts. Only one representation was made by the Acting Returning Officer for the East Surrey constituency, which is provided under paragraphs 49 - 50.

Preliminary review, scope, and initial proposals

16. The recommended proposals were drafted based on the Electoral Commission's guidance for the conduct of Polling Place and District Reviews, which states that –

“The local authority should undertake a preliminary review of the current polling districts and polling places with a view to establishing their suitability and identify any potential alternatives where required. This may be done before the start of the specified review period.”

17. As part of the preliminary review, the Electoral Services team conducted site visits of:
 - (i) any existing polling places which Electoral Services considered may be unsuitable for a General Election, based on stakeholder feedback from

previous elections or if the electorate based at a particular polling station was particularly large; and,

- (ii) Potential, new polling places which may be better suited to a high turnout election event where any concerns had been raised –
 - using the Electoral Commission’s checklists to assess the suitability of those polling places. Copies of the completed checklists for any new potential polling places are provided under **Annex 2**.

18. The preliminary review of suitable polling places identified the following premises which were visited and evaluated, if possible:

Table 1 - List of premises considered or evaluated for suitability as a polling place.

Borough Ward	Polling District	Polling place
Banstead Village	BAN3	- Banstead Community Hall (Annex 2)
Hooley, Merstham and Netherne	HMN5	- (NEW) St Teresa's, Merstham Football Club (Annex 2)
Horley West and Sidlow	HRW3	- Pathfinder Scout Hall (<i>no visit required, consulted polling staff who confirmed the building was still suitable</i>).
Meadvale and St John's	MSJ1 & 2	- Redhill Baptist Church (<i>not available</i>)
	MSJ4 & 5	- St John the Evangelist Church Centre (<i>no response</i>).
Nork	NOR1	- (NEW) Nork Community Association (Annex 2).
Redhill East	RDE2	- (NEW) Carrington School (Annex 2).
	RDE3	- (NEW) St John's Ambulance Centre (Annex 2).
Reigate	RGT3	- Reigate Methodist Church (<i>not available</i>).
	RGT4 & 5	- Colman Redland Centre (<i>no visit required, consulted polling staff who confirmed the building was still suitable</i>).
Tattenham Corner and Preston	TCP1	- St Mark`s Church Hall (<i>no visit required, consulted polling staff who confirmed the building was still suitable</i> .)
	TCP2	- Tadworth Leisure Centre (<i>no visit required, consulted polling staff who confirmed the building was still suitable</i>).

Relevant considerations in respect of polling districts:

19. The following should be considered as part of the assessment of the suitability of polling district boundaries:

- (i) Do the polling districts follow the different electoral boundaries (such that the Returning Officer can manage the different combinations of elections and referenda within each geographical area), such as parish and town council wards, borough wards, county divisions and parliamentary constituencies (both current and future)? For instance, a borough ward may overlap with multiple town or parish council wards, and therefore the division of polling districts within that borough ward must allow each combination of those polls to take place together, if required.
- (ii) Are the boundaries well-defined? For example, do they follow the natural boundaries of the area? If not, is it clear which properties belong in the polling district?
- (iii) Are there suitable transport links within the polling district, and how do they relate to the areas of the polling district that are most highly populated?
- (iv) Are there any obstacles to voters crossing the current polling district and reaching the polling place e.g., steep hills, major roads, railway lines, rivers?

Relevant considerations in respect of polling places:

20. There are a number of factors that will need to be considered when reviewing existing polling places or when assessing new polling places, including:

Factor	Consideration
Location	<ul style="list-style-type: none"> i. Is it reasonably accessible within the polling district? ii. Does it avoid barriers for the voter such as steep hills, major roads, rivers, etc.? iii. Are there any convenient transport links?
Size	<ul style="list-style-type: none"> iv. Can it accommodate more than one polling station if required? v. If multiple polling stations are required, is the polling place capable of accommodating all voters and staff required to provide a good service to voters? vi. Is the size sufficient to provide necessary private areas or privacy screens for photographic identification checks? vii. Is the size big enough to ensure the flow of voters and reduce the risk of congestion and queues even where there is a high turnout?
Availability	<ul style="list-style-type: none"> viii. Is the building readily available in the event of any unscheduled elections? ix. Is there any possibility that the building may be demolished as part of a new development?
Accessibility	<ul style="list-style-type: none"> x. Is the building accessible to all those entitled to attend the polling place?

- xi. Can the building accommodate any equipment provided to support disabled voters?

Use of schools

21. It should be noted that 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 from funds provided by Parliament. This includes academies and free schools.
22. It is the policy of this local authority to avoid using schools where possible to minimise disruption to education services within the borough, however in some cases it may be unavoidable if there are no suitable alternatives in a particular polling district.
23. Over the past ten years, the local authority has subsequently reduced the number of schools designated as polling places across the borough.
24. In cases where use of a school is unavoidable, the Electoral Services office will consult with the school to conduct a risk assessment to identify any health and safety or safeguarding risks and agree how best to mitigate them. For instance, this could include a temporary closure of the school (e.g. inset day) or location of the polling station in a separate, secure area of the site with the provision of security staff to manage voter access.
25. The only school currently designated as a polling place is the Westvale Park Primary Academy School in the HRW4 polling district (Horley West and Sidlow ward). There is a lack of suitable alternatives currently within the West Park development area until the completion of a proposed community hall within the development has completed, which will be considered as part of a future review. The school is considered to be suitable polling place for the next General Election and is therefore not proposed to change as part of this review.
26. This review proposes to designate the Carrington School on Noke Drive (formerly the Warwick School) in the Redhill East ward as the polling place for one polling station taken from St Joseph's Church (which currently supports three polling stations). This location was used as a polling place for several years in the past, including for parliamentary General Elections, and is considered to be a suitable polling place. Further details about the suitability of this venue are provided under [Annex 1](#) and [Annex 2](#).

Implementing polling district changes

27. If approved by the Council, the changes proposed within this polling district and places review will result in new polling districts being created and existing polling district boundaries being amended.
28. If the council makes any alterations to the polling districts in its area, the Electoral Registration Officer (ERO) must amend the register of electors accordingly (Section 18A (5) Representation of the People Act 1983).
29. The changes to the register take effect on the date the ERO publishes a notice stating that the adaptations have been made. It is intended that alterations to polling districts will be included when the register of electors is republished on 1 December 2024 (including the renumbering of elector numbers).

30. Where polling districts have been created to support the implementation of boundary changes, the register will need to be constructed in a way that is capable of reflecting the existing and new boundaries. This is to ensure that any parliamentary by-elections can be run on the existing boundaries, until the new boundaries come into force at the next General Election.

Options

31. To approve the recommendations for the reasons set out on page 1. If approved, a full list of the proposed polling places for the next scheduled elections on 2 May 2024 is provided at **Annex 3** for completeness.
32. To reject the recommendations. This is not recommended, as the current arrangement of polling districts and polling places is not considered to be suitable for the next General Election. In doing so, the local authority would be at risk of failing in its duty to ensure that all electors have reasonable facilities for voting, in accordance with the Electoral Commission's guidance which it must have regard to.

Legal Implications

33. Local authorities must comply with the following legislative requirements regarding the designation of polling districts and polling places:
- (i) each parish in England and community in Wales is to be a separate polling district, unless special circumstances apply
 - (ii) 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
 - (iii) 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)
 - (iv) 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

Financial Implications

34. This report proposes a minor increase in the number of polling districts and polling places, which will require the Returning Officer to pay additional costs for the rental, equipment and staffing of polling stations to administer future elections.
35. However, if adopted these changes will not require additional growth in the Returning Officer's budget for the delivery of future elections and referenda.
36. There are therefore no specific financial implications to consider.

Equalities Implications

37. Local authorities have a duty to review the accessibility of all polling places to disabled voters and ensure that every polling place, and prospective polling place, for which it is responsible is accessible to disabled voters 'so far as is reasonable and practicable'.

38. According to the Equalities and Human Rights Commission the duty to make reasonable adjustments comprises three requirements.
39. For service providers and those exercising public functions, these requirements are:
 - (i) Where a provision, criterion or practice puts disabled people at a substantial disadvantage compared with those who are not disabled, to take reasonable steps to avoid that disadvantage.
 - (ii) Where a physical feature puts disabled people at a substantial disadvantage compared with people who are not disabled to avoid that disadvantage or adopt a reasonable alternative method of providing the service or exercising the function.
 - (iii) Where not providing an auxiliary aid, for example a ramp for wheelchair user, puts disabled people at a substantial disadvantage compared with people who are not disabled, to provide that auxiliary aid.
40. Every person should be able to vote without facing barriers. By identifying and understanding the physical, psychological and information barriers disabled people may face when voting, Returning Officers will be better able to make appropriate arrangements to help support them.
41. As part of this review, the local authority must consider the accessibility of potential polling stations when considering designating or reviewing a polling place. In doing so it must seek to ensure that:
 - (i) all electors in a constituency in the local authority area have such reasonable facilities for voting as are practicable in the circumstances.
 - (ii) so far as is reasonable and practicable every polling place for which it is responsible is accessible to electors who are disabled.
42. Access to the polling station is still a barrier to some disabled people who want to cast their vote in person. Some of the main physical access issues which were considered as part of this review (during the preliminary review by Electoral Services) included:
 - (i) polling places and stations with steps into the entrance, or otherwise inaccessible
 - (ii) narrow doorways and corridors
 - (iii) lack of space within the polling place that did not enable motorised wheelchair manoeuvrability
 - (iv) lack of space and secrecy for the elector and their companion to discuss the elector's choice of vote
 - (v) lack of low level polling booths or booths/tables that didn't provide disabled voters with confidence that they could cast their vote in secrecy as they were positioned close to the polling station staff
 - (vi) a lack of chairs to enable people to rest
 - (vii) a lack of a clear display of guidance or aids (such as tactile voting devices) to enable people to feel confident about the process

(viii) inadequate lighting

43. The assessment of these criteria is provided within the evaluation forms in respect of each of the recommended changes under [Annex 2](#).

Communication Implications

44. Any changes to the designation of polling districts and places will be communicated with voters as part of the Returning Officer's:

- (i) publicity campaign (e.g. website, social media, press releases, leaflets at community centres, surgeries, and borough news articles and other materials);
- (ii) briefing and frequently asked questions documentation provided to the customer contact team and polling station staff;
- (iii) election materials provided to voters (e.g. a change of polling place will be highlighted on poll cards); and,
- (iv) equipment provided at polling stations (e.g. additional signage around both the previous and new polling place) to direct voters to the correct location.

Consultation

45. The length of the review process is not prescribed, provided all the steps required by the legislation can be undertaken within it.

46. However, the time allowed for consultation should be sufficient to enable interested persons and groups to read and understand the proposals, gather comments and respond with any alternative arrangements that they may wish to submit.

47. In addition to a [press release](#) promoting the public consultation on 25 October 2023, the following stakeholders were contacted in writing when the consultation period started on 13 October 2023 inviting them to comment on the proposals, including:

- (i) All Borough and County Councillors within the Reigate and Banstead area;
- (ii) Political parties;
- (iii) Members of Parliament for constituencies within the Reigate and Banstead area;
- (iv) Parish and Town Councils; and,
- (v) Residents' Associations.

48. Consultation of Acting Returning Officers for constituencies overlapping with the Reigate and Banstead electoral area included the Acting Returning Officers for:

- (i) The Reigate Constituency (revised boundaries).
- (ii) The East Surrey Constituency (revised boundaries).
- (iii) The Dorking and Horley Constituency (a new constituency which will take effect at the next General Election).
- (iv) The Epsom and Ewell Constituency (no longer forming part of the Reigate and Banstead electoral area at the next General Election).

- (v) Consultation of community groups with particular expertise in relation to access to premises or facilities for persons who have different forms of disability included:
- (vi) Surrey Coalition of Disabled People; and,
- (vii) SCOPE.

49. There were no representations from any of the stakeholders referred to above, or from members of the public in response to the public consultation, except from the Acting Returning Officer for the East Surrey constituency. Their comments were:

“The amended East Surrey Parliamentary Constituency, of which I am the Acting Returning Officer, includes the Hooley, Merstham & Netherne Ward of Reigate and Banstead. I agree with the proposal to use St Teresa Church Community Room as a polling station for voters in polling district HMN5. The venue is suitable located within the polling district and appears to have the necessary facilities for use as a polling station.

As the polling station for HMN4 (Merstham Community Hub) is located within HMN5, it will be important that the Council, if agreeing to this proposal, ensure there is suitable communication sent to voters within HMN5 about their new polling station. A number of voters will have to pass Merstham Community Hub, a venue they are used to voting at, in order to vote at St Teresa Church Community Room. Clear communication about their new polling place will ensure voters are less likely to attempt to vote at the Community Hub.”

50. Whilst the Acting Returning Officer for the East Surrey constituency is supportive of these proposals, the Electoral Registration Officer for the Reigate and Banstead electoral area will take action to address their comments in respect of ensuring the changes are communicated effectively with voters in advance of future parliamentary elections (as detailed under paragraph 44).