

London Borough of Enfield

Council

Meeting Date: 17 November 2021

Subject: Polling District and Polling Place Review
Cabinet Member: Not applicable
Chief Executive: Ian Davis
Key Decision: Not Applicable

Purpose of Report

1. To consider the polling district and polling place scheme 2022.

Proposal(s)

2. Council is asked to:
 - ❖ To note the submissions made to Council in respect of the review of polling districts and polling places as set out in Appendix 5.
 - ❖ To note the review process undertaken by the General Purposes Committee.
 - ❖ To approve the adoption of parliamentary polling districts and parliamentary polling places as set out in the scheme contained in Appendix 1.
 - ❖ To approve the reasons given in the report in respect of the designation of parliamentary polling districts and parliamentary polling places.
 - ❖ To approve the scheme contained in Appendix 1 to be adopted in relation to all referenda and elections.
 - ❖ To instruct the Director of Law & Governance to publish such notices and other documentation required by law on completion of the review.
 - ❖ To instruct the Electoral Registration Officer to make the necessary amendments to polling districts for the 1 December 2021 electoral register.
 - ❖ To instruct the Electoral Registration Officer to merge the polling districts whose label includes a number for the 1 December 2022 electoral register.
 - ❖ To delegate authority to the Director of Law & Governance in consultation with the Chair of General Purposes Committee to make, where necessary, minor alterations to the polling scheme prior to the next compulsory review (October 2023 to January 2025).

Reason for Proposal(s)

3. The Local Government Boundary Commission for England (LGBCE) Order for the London Borough of Enfield Electoral Review created new ward boundaries effective from May 2022. The LGBCE created 25 wards, four more than there are currently. The number of councillors will remain the same. The 63 councillors will represent 13 three-councillor wards and 12 two-councillor

wards. A new polling scheme is required to reflect the new boundaries at the revision of the electoral register on 1 December 2021.

Relevance to the Council Plan

4. The alteration of polling districts to be implemented in the borough will not impact on the Enfield Council Plan 2020-2022.

Background

5. The statutory responsibility for reviewing UK Parliamentary polling districts and places rests with each relevant local authority in Great Britain for so much of any constituency as is situated in its area.
6. The responsibility to provide recommendations to Council on electoral arrangements in the borough relating to the designation of polling districts and polling places lies with the General Purposes Committee.
7. The Electoral Registration and Administration Act 2013 amended the Representation of the People Act 1983 to require the Council to undertake regular reviews of both polling districts and polling places within its area. The differences between a district, place and station are as follows:
 - A polling district is a geographical sub-division of an electoral area, (an electoral area being a UK Parliamentary constituency, a European Parliamentary electoral region, a parish, parish ward or an electoral division).
 - A polling place is the building or area in which polling stations will be selected by the 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.
 - A polling station is 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. The Returning Officer for the particular election must provide a sufficient number of polling stations and allocate the electors to those polling stations in such manner as he or she thinks the most convenient.
8. The purpose of such a review is to ensure that all electors have reasonably practicable facilities for voting and that polling places are reasonably accessible to electors who are disabled.
9. The Act requires the Council to publish notice of a Polling District and Polling Place review and to consult both the Acting Returning Officer (ARO) for parliamentary elections and persons whom the Council considers have particular expertise in relation to access to premises or facilities for persons who have disabilities. In addition, anyone may comment on the review.
10. In relation to the 1 July to 1 December 2021 period, the Acting Returning Officer considered the following:

- a. Annual canvass June to December 2021
- b. Revised electoral register scheduled to be published on 1 December 2021
- c. By elections during the review period
- d. Scheduling approval of the proposals
- e. Proposals to be submitted to Council in good time for approval prior to publication.
- f. Awareness of current parliamentary constituency boundaries.

Review process 2021

11. The General Purposes Committee at its meeting on 4 August 2021 approved the timetable for the formal review process as set out below.

Month	Activity
May to Jul 2021	Preliminary review: Gather and analyse evidence (electorate forecasts, demographics, engage with elected members)
4 Aug 2021	Report to the Committee on the programme of work for the preliminary and formal review
5 Aug 2021	Publish a notice of the holding of the formal review
5 Aug 2021	Publish ARO representation
5 Aug - 20 Sep 2021	Public consultation period
August 2021	Consultation materials forwarded for comment to key stakeholders including: <ul style="list-style-type: none"> • Disability and Carers groups • Community groups • Elected representatives
14 Oct 2021	General Purpose Committee to consider representations and make recommendations to Council
17 Nov 2021	Council to consider recommendations from General Purpose Committee
Nov 2021	Amend the electoral software to reflect new polling scheme
1 Dec 2021	Publish revised register with new polling districts*

❖ *It should be noted that if an unscheduled election were to take place in December, the electoral register would need to be published on the existing scheme. This would ensure that polling station information contained on poll cards remained accurate for election day. In this circumstance, the electoral register would need to be re-published on 1 January or 1 February 2022, to reflect the new scheme.*

12. A preliminary review was undertaken of the current polling districts and polling places with a view to establishing their suitability and identifying any potential alternatives where required following the new ward boundaries.

13. The following data and information were used to assist with the preliminary review:
- Population density heat maps
 - Data provided to the LGBCE detailing proposed areas of new development, the approximate number of dwellings and expected population numbers for those areas.
 - Road traffic maps highlighting levels of congestion
 - List of School Streets and Low Traffic Neighbourhoods (LTNs)
 - Public transport accessibility data
 - Details of current polling places and an indication as to their overall suitability for purpose
 - Presiding Officer/Polling Station Inspector comments from May 2021 GLA election
 - Surveys completed as part of the 2019 polling place review
 - Ward profile information including levels of deprivation, ethnicity and disability data
 - Site visits were undertaken to assess the suitability of alternative venues.
14. All ward councillors were invited to drop-in sessions during the period 28 June to 7 July, to offer information and local knowledge to aid the Acting Returning Officer when considering proposals for both polling districts and polling places.
15. The formal review process commenced on 5 August 2021 with the publishing of the notice of the review.
16. The Electoral Commission's guidance is attached at Appendix 8 which provides more detailed requirements on the Formal Review Process (para 4.5) and Considering Accessibility Issues (para 4.6).
17. In accordance with the guidance, when carrying out the review, local authorities must:
- publish a notice of the holding of a review
 - consult the ARO for every parliamentary constituency which is wholly or partly in its area
 - publish all representations made by an ARO within 30 days of receipt by posting a copy of them at the local authority's office and in at least one conspicuous place in their area and, if the authority maintains a website, by placing a copy on the authority's website
 - 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. Such persons must have an opportunity to make representations and to comment on the representations made by the AROs.

- on completion of a review, give reasons for its decisions and publish:
 - all correspondence sent to an (Acting) Returning Officer in connection with the review
 - all correspondence sent to any person whom the authority thinks has particular expertise in relation to access to premises or facilities for persons who have different forms of disability
 - all representations made by any person in connection with the review
 - the minutes of any meeting held by the council to consider any revision to the designation of polling districts or polling places within its area as a result of the review
 - details of the designation of polling districts and polling places within the local authority area as a result of the review
 - details of the places where the results of the review have been published.

Main Considerations for the Council

Consultation approach and representations received

18. Consideration was given to the school holiday period. Therefore, the consultation period ran between 5 August 2021 and 20 September 2021. Documents relating to the review were made available on the Council's website and at the Civic Centre. Representations could be submitted via the online questionnaire, or in writing via email or by post.
19. Representations were sought from such persons as the Council considers to have particular expertise in relation to access to premises or facilities for person who have different forms of disability. A list of consultees is attached at Appendix 4.
20. The Acting Returning Officer (ARO) for Edmonton, Enfield North and Enfield Southgate parliamentary constituencies provided a submission which was published on 5 August 2021. The ARO's submission which included the methodology, approach and proposals was made available on the Council website from 5 August and at Enfield Civic Centre.
21. As part of the consultation process, all London Borough of Enfield councillors, the Members of Parliament for Enfield's three parliamentary constituencies, the Greater London Assembly Member for Enfield & Haringey, and agents for candidates who have stood in London Borough of Enfield elections in recent years were invited to respond to the consultation via email.
22. The public consultation was advertised on the Council website, the Council's social media channels, internal staff channels, clear channel boards around the borough, in local newspapers (Enfield Independent, The Albanian, Parikiaki and Avrupa), Council e-newsletters and at ward forums.
23. The consultation was forwarded to around 480 community groups including disability groups, sports clubs, residents' groups, faith groups, youth centres

and charities. Members of the Enfield Faith Forum were invited to comment on the proposed polling scheme.

24. The Council's Staff Disability Working Group were also invited to comment on the accessibility of polling places in the borough.

Consultation responses

25. In total, responses were received from 28 individuals or organisations in relation to 16 wards. All responses are summarised at Appendix 5 along with information from the proposals attached at Appendix 1.

26. In the main, the responses received supported the Acting Returning Officer's proposals with minor amendments suggested to polling district boundaries and/or polling places.

27. A workshop was held for the members of General Purposes Committee to discuss the representations received and to consider accessibility and convenience for electors.

28. A number of responses received were outside the scope of this review and therefore cannot be addressed as part of this report. This includes: ward boundary changes, changes to the number of councillors per ward, postal voting and general feedback on accessibility not related to a specific venue. These responses are summarised at the end of Appendix 5. Where appropriate, these responses will be passed to the relevant department.

Polling district, polling place and polling station requirements

29. The proposed polling district and polling place scheme has been devised to meet the following statutory requirements that the Council must consider when designating polling districts and polling places:

- 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.
- The polling place must be an area in the district, unless special circumstances make it desirable to designate an area wholly or partly outside. There are 7 polling districts which have been assigned a polling place outside the ward boundaries. This is due to there being no suitable venue within the ward boundaries.
- 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 polling place must, as far as is reasonable and practicable, be accessible to electors with disabilities.

30. A number of other considerations have been taken into account when devising the polling district and polling place scheme. They have been summarised in paragraphs 32 to 37.
31. All consultation responses received have been considered when devising the proposed polling district and polling place scheme.

Parliamentary boundaries

32. The parliamentary boundaries are not affected by the ward boundary changes coming into effect in May 2022. For areas where the ward boundaries are no longer coterminous with the parliamentary constituency boundary, it is required to retain a separate polling district to enable the electors to be registered within the existing parliamentary constituency boundary and the future ward boundary. The polling district labelling described in paragraph 39 includes the final letter denoting the constituency.

Polling district boundaries

33. Where possible, natural barriers such as rivers or watercourses and manmade barriers such as major roads and railways have been used to delineate areas. Other obstacles to voters crossing the polling districts have been considered such as steep hills or limited public transport links.

Polling districts currently in different wards

34. The inclusion of a number in the polling district letters denotes polling districts from different current wards that will attend the same polling place under the new proposals. The separate polling districts ensure that current elected representatives can be provided with electoral alterations in accordance with the statutory requirements. After the elections in May 2022 the polling districts will be merged into one polling district at the next revision of the register.

Polling places and stations

35. To comply with Electoral Commission guidance, the number of electors allocated to each polling station should not exceed 2,500. This excludes postal voters and those not eligible to vote. Where a polling district has been allocated more than 2,500 electors, the electorate is split between two polling stations in the same venue. This is known as a double polling station.
36. It should be noted that for the purpose of taking the poll in England and Wales, the ARO 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. It is acknowledged that the use of schools as polling places can cause disruption to pupils, parents and teachers. However, schools are often

the most suitable, and sometimes the only, appropriate building within a polling district. In order to avoid unnecessary disruption to pupil's education, school premises should only be designated where there are no alternative suitable premises within the polling district. The ARO also works closely with those schools identified as polling places to support them to keep the majority of their building open on polling day wherever possible. The proposed polling scheme reduces the number of schools by 5.

37. It is acknowledged that temporary buildings are significantly more expensive than permanent premises and may require significant parking restrictions which have a negative impact on residents. The deployment of temporary buildings has been limited to areas where there are no available alternatives.

Proposed polling district and polling place scheme

38. The proposed polling district and polling place scheme was approved by the General Purposes Committee on 14 October 2021 and is recommended for approval by Council. The scheme is set out in detail in Appendix 1. The proposals include the following details:

- Map showing the polling district boundaries and location of polling places
- Polling district letters and description of polling district boundaries
- Parliamentary constituency
- Polling place
- Recommended number of polling stations to be used at a combined local and parliamentary election
- Estimated number of in-person electors
- Assessment of disabled access
- Justification for any amendments or no change proposals
- Following approval of the polling scheme by the General Purposes Committee, extensive cross-checking of the properties within each polling district has been undertaken. A number of minor adjustments of the polling district boundaries were made and are listed in Appendix 1.

39. The following labelling convention has been used for the polling district letters:

- First two letters denote the ward (e.g. AG for Arnos Grove)
- Third letter denotes the polling district (e.g. A, B, C, etc.)
- Inclusion of number indicates polling districts that are currently in separate wards and which will be merged following the May 2022 elections.
- X, Y or Z indicates the parliamentary constituency.

40. The proposals recommend a total number of 108 polling places.

Safeguarding Implications

41. None

Public Health Implications

42. None

Equalities Impact of the Proposal

43. 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'.

44. In order to determine the accessibility of polling places, the following criteria was taken into account:

- Level access at entrance to and within the polling place (or space for a temporary ramp)
- Wide enough doorways and corridors
- Sufficient space within the polling place to enable motorised wheelchair manoeuvrability

The Electoral Commission guidance (Appendix 8) provides further information on considering accessibility issues.

45. Groups and individuals with expertise in the Enfield area and the staff Disability Working Group were invited to respond to the ARO's representations in the public consultation.

46. To ensure the consultation was accessible to those whose first language is not English, adverts were placed in foreign language newspapers. The Enfield Council website has a built-in translator tool which enabled visitors to translate the Polling District & Polling Place Review webpage.

47. A detailed Equality Impact Assessment (EqIA) (Appendix 6) has been developed alongside the review in order to assess its impact on each protected characteristic.

48. The EqIA reinforced that access requirements for elderly and disabled electors have been taken into account when devising the polling district and polling place scheme. The EqIA also highlighted that public transport accessibility data was considered to cater for the needs of electors without access to a private transport.

49. The EqIA concludes that the use of schools as polling places can have a negative impact on young people of school age (4-18). The EqIA also

concludes that the use of religious buildings as polling places may discourage other faith groups from voting. Due to the requirement to provide polling places in a specified area (a polling district) and the requirement to make them accessible to all, it is often not possible to secure the use of an alternative facility.

Environmental and Climate Change Considerations

50. None

Risks that may arise if the proposed decision and related work is not taken

51. Reputational risk for the Council and Returning Officer if the review was not completed prior to the LB Enfield election to be held in May 2022.

Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks

52. There is a risk that electors whose polling place has changed may be unsure where they should go to vote at the next election in May 2022. To minimise the risk, the Electoral Registration Officer and Returning Officer will run an additional information campaign prior to the May elections to remind electors that their polling place may have changed through the following channels:

- Housing Notification Letters (HNLs)
- Poll card inserts
- Enfield Council website
- Social media campaign.

Financial Implications

53. A one-off allocation of £150k from contingent items has been agreed to fund the polling district and polling place review.

54. Any proposed increased number of temporary units and the movement away from public funded schools will increase the venue hire costs at future elections. The proposals set out in Appendix 1 recommend an additional 6 temporary units. The additional cost for the hire of these temporary units is estimated at around £15,600.

Legal Implications (Jeremy Chambers)

55. All relevant legal matters are addressed in the body of the report.

Workforce Implications

56. Additional one-off resources have been allocated to the Director of Law and Governance to undertake this project.

57. The recruitment and engagement of additional polling staff may be required at May 2022 elections. The responsibility for staffing polling stations lies with the Returning Officer for each electoral event. Increased levels of postal voting may negate the need for additional staff at polling stations.

Property Implications

58. None

Other Implications

59. None

Options Considered

60. None

Conclusions

61. The LGBCE Order for the London Borough of Enfield Electoral Review requires the realignment of the polling districts through a Polling District and Polling Place Review in preparation for the May 2022 elections. Compliance with the Electoral Commission guidance minimises the risk of appeal of the Council's decision.

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Date of report: 17 November 2021

Appendices

Appendix 1: Polling district and polling place scheme 2022

Appendix 2: Polling scheme 2022 (Map of full borough)

Appendix 3: Estimated in-person electorate figures (November 2021)

Appendix 4: List of consultees

Appendix 5: Summary of representations received in the polling district and polling place review consultation

Appendix 6: Equality Impact Assessment (EqIA) – Polling District and Polling Place Review 2021

Background Papers

The following documents have been relied on in the preparation of this report:

Electoral Commission, Reviews of polling districts, polling places and polling stations

https://www.electoralcommission.org.uk/sites/default/files/word_doc/Polling-district-review-guidance.doc

(Acting) Returning Officer's Representations (published 5 August 2021)

<http://governance.enfield.gov.uk/documents/s89481/Appendix%207%20-%20Acting%20Returning%20Officers%20Representations%205%20August%202021%20-%20MM.pdf>