



General Purposes Committee
8 November 2021

**Report from the Chief Executive and
(Acting) Returning Officer**

Review of Polling Districts, Polling Places and Polling Stations

Wards Affected:	All
Key or Non-Key Decision:	N/A
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
No. of Appendices:	Five: Appendix A: (Acting) Returning Officer Recommendations Appendix B: Comments Received in Response to the Consultation Appendix C: Demographics of Consultees Appendix D: Ward Representation Outlined by the LGBCE Appendix E: Maps Outlining Existing and Proposed Arrangements
Background Papers:	None
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1.0 Purpose of the Report

- 1.1 In accordance with the Representation of the People Act 1983 (as amended by the Electoral Administration Act 2006) and the Electoral Registration and Administration Act 2013, Brent Council is undertaking a review of the local authority's polling districts and polling places. The Acts require that the local authority consults widely before reaching a decision on its preferred electoral arrangements. In addition, the (Acting) Returning Officer for each constituency is required to submit their own proposals for future electoral arrangements. What follows are the proposals for the London Borough of Brent and the three

Brent wards of Hampstead and Kilburn constituency. The Chief Executive for Camden Council is the (Acting) Returning Officer for that constituency and has been consulted on the polling arrangements for the relevant area.

2.0 Recommendations

That the General Purposes Committee agree:

- (i) The proposed changes to polling district boundaries and location of polling places as set out in section 6 below and Appendix A.
- (ii) To delegate to the (Acting) Returning Officer authority to approve an alternative polling place in the event that any polling place becomes unavailable or is found to be unsuitable in the run up to an election, and to make this change on a permanent basis following the election.

3.0 Background

3.1 The Local Government Boundary Commission for England (LGBCE) has undertaken a review of the electoral wards of Brent and made the following recommendations:

- Brent will be represented by 57 ward councillors, six fewer than under the current arrangements.
- Brent will have 22 wards, one more than under the current arrangements.
- The boundaries of all wards other than Kilburn have changed.

3.2 The new arrangements will come into force for the local government elections on Thursday 5 May 2022.

3.3 The London Borough of Brent (Electoral Changes) Order 2020 was made by Parliament on 28 January 2020 implementing the changes. As a result of the changes, the council needs to carry out a review of all the polling districts and polling places in the borough.

3.4 It should also be noted that this review is only concerned with the internal polling district boundaries. The ward boundaries have been ratified by Parliament and cannot be changed.

4.0 Detail

4.1 The Representation of the People Act 1983 (as amended by the Electoral Administration Act 2006) and the Electoral Registration and Administration Act 2013 requires each electoral registration authority in England, Scotland and Wales to carry out a review of both its polling district boundaries and its polling places every five years from 2013. Reviews may be undertaken at other times and a review is currently being undertaken in view of the changes to the

electoral ward boundaries in the borough. Members are asked to make a decision on new electoral arrangements in time for any changes to be incorporated into the Revised Register for Brent being republished on 1 January 2022.

4.2 Polling districts, polling places and polling stations are defined as follows:

A **polling district** is a geographical sub-division of an electoral area, i.e. a UK Parliamentary constituency, a European Parliamentary electoral region, a ward or an electoral division.

A **polling place** is a geographical area in which a polling station is located. However, as there is no legal definition of what a polling place is, the geographical area usually defined as the premises inside which voting takes place.

A **polling station** is the actual area where the process of voting takes place, and must be located within the polling place designated for the particular polling district. There may be more than one polling station in a polling place.

In accordance with Electoral Commission guidance, no more than 2,500 electors should be allocated to a polling station.

4.3 The Council is required to give notice of the review and to consult with interested parties, including organisations with a particular interest and expertise in advising on access to buildings for people with different types of disability.

5.0 Summary of Consultation Responses

5.1 Brent Council ran a wide consultation exercise seeking responses to its proposals and suggestions for new polling places where required. The consultation period ran from 25 August to 15 October 2021. Details of the consultation were sent to all elected members of the Council and to local MPs. All existing and proposed polling stations were contacted as well as Brent's Disability Forum members and a wide list of locally-based disability groups and charities. In addition, the consultation was publicised through the Council's consultation portal. The (Acting) Returning Officer for the London Borough of Camden, who is responsible for the Hampstead and Kilburn parliamentary constituency, was also invited to comment on the proposal and agreed with the suggested boundaries and stations for the relevant polling districts.

5.2 During the seven and a half weeks of consultation, a total of 76 people responded. Sixty-seven of these responses were received via the consultation portal, one person posted a paper copy of their response to the Electoral Services Team, and eight responses were received through email.

5.3 Out of the 76 participants, 62 were Brent residents, seven were ward councillors, five were existing or proposed polling stations, and the remainder did not specify. Appendix B sets out the detailed comments that were received

throughout the consultation period. Appendix C sets out more detail on the demographics of respondents who commented on the polling places and districts.

- 5.4 We asked the respondents to the survey to comment on the proposed polling district boundaries. There were no substantive comments received in relation to the boundaries. We also asked the respondents in the survey to comment on the proposed polling places/stations. Out of the 76 participants, 12 respondents commented on Brent's usage of schools as polling stations. Five people supported our use of libraries instead of schools, three additional people wrote that we should use fewer schools were possible, and another four people commented specifically about Anson Primary School, asking that we should limit our usage of that school.

6.0 Proposed Changes to Polling District Boundaries and Location of Polling Places

- 6.1 In summary:

- Changes to polling district boundaries have been proposed in relation to all 22 wards.
- 95 polling places will be required under the new arrangements in 2022, compared to 103 for the GLA Election.
- 81 polling places will remain the same.
- 14 new polling places have been suggested.
- It is proposed that 21 existing polling stations will not be used. These include nine schools and five temporary polling stations (portacabins).

- 6.2 The proposals to change polling places reflect comments received in the consultation, particularly in relation to the request to reduce the use of schools, and the need to ensure that the new polling districts are served by polling stations which are accessible. The changes are also a result of the reduction in the overall number of polling places required (from 103 to 95 in total) which is a reflection of the boundary changes, and the move to wards with fewer polling districts under the new arrangements.

- 6.3 Maps for each ward showing the existing and the proposed new arrangements in relation to polling district boundaries and location of polling places are shown at Appendix E. The notations used on the maps for the new wards and proposed polling district relate to the ward name and polling district number. For example AL1 is Alperton polling district 1, HK1 is Harlesden and Kensal Rise polling district 1.

The proposed changes are shown on each map and are summarised here (and at Appendix A):

- 6.4 **Alperton ward:**

The new ward is made up of the existing NAL1, NAL3, NAL4 polling districts, it also includes part of NAL2 and a small portion of CST5.

There is a large amount of development in this area, which has been taken into account.

We are proposing that Abbey Estate Community Centre and the Nursery Building at Lyon Park Primary School are both replaced by St George: Grand Union. This new polling place located in AL4 will serve for both the AL3 and AL4 polling districts.

No other changes are proposed for the remainder of polling places in the Alperton ward.

6.5 Barnhill ward:

The new ward is made up of the existing NBA3, NBA5 and NBA6 polling districts and the majority of the NBA4 polling district.

We propose to move the boundary between the existing BA3 and BA4 to the rear property lines of Barn Hill incorporating all electors to the east of the current boundary into BA1.

- The Parish Hall is large enough to take in the additional electors.
- This would reduce the numbers in BA4 to only require a single temporary polling station on Kings Drive. This would also reduce the number of people having to travel up the hill on Kings Drive.

No changes are proposed for the polling places in the Barnhill ward.

6.6 Brondesbury Park ward:

The new ward is made up of the majority of the old ward, with the exception of minor changes to HBP1 and HBP3.

BP1: The Library at Willesden Green falls outside of the ward; however, this is also the case under the current arrangements.

We do not propose any changes to the existing polling places in this ward.

6.7 Cricklewood & Mapesbury ward:

The new ward takes in the existing polling districts for the old Mapesbury Ward with the exception of CMA3.

CMA3 now falls within the Willesden Green ward.

CM2: Anson Primary School has requested we seek an alternative polling place. We propose to replace Anson Primary School with Cricklewood Baptist Church Hall.

No other changes are proposed for the remainder of polling places in the Cricklewood & Mapesbury ward.

6.8 Dollis Hill ward:

The new ward takes in the entirety of the old Dollis Hill Ward and polling districts CDU1, CDU2 and CWH6.

Although the polling places for DH3 and DH4 appear to be very close to each other, due to way the entrance is configured for Braintcroft School in DH3, the distance is too great to merge the polling districts.

We propose merging the existing polling districts CWH6 and CDU2, so the temporary polling station in Crispian Close car park would no longer be required.

No other changes are proposed for the remainder of polling places in the Dollis Hill ward

6.9 Harlesden and Kensal Rise ward:

The new ward takes in the entirety of CKG1-5, CHA4, the majority of CHA5 and 142 properties of CHA2.

We are not proposing any changes to the existing polling places in this ward.

6.10 Kenton ward:

The new ward is made up of the existing NNP1, NKE2, NKE3, NKE4, KE5, NBA1 and NBA2 polling districts. It also includes the majority of NKE1.

Polling districts NKE1 and NKE2 were merged to create the new KE5 polling district.

Polling districts NBA1 and NBA2 were merged to create the new KE6 polling district.

For KE2, Haridam Temple, a previous polling station, was investigated, but is currently unavailable. We will therefore remain in the Hut outside of the Masonic Lodge.

For KE5 – Both Claremont High School and Lindsay Park Baptist Church Hall were used in the existing NKE1 and NKE2 polling districts. With the merging of the two polling districts to form the new KE5 polling district, we will only be using Lindsay Park Baptist Church Hall.

No other changes are proposed for the remainder of polling places in the Kenton ward.

6.11 Kilburn ward:

Polling districts HKI2 and HKI3 were merged to create the new KI2 district.

The boundary between the existing HKI4 and HKI5 has been moved to Carlton Vale.

We are not proposing any changes to the existing polling places in this ward.

6.12 **Kingsbury ward:**

The existing NFR1 and NFR2 have been merged and Father O'Callaghan Centre will be used as the polling place for KY2.

The existing NFR5 and NFR7 districts have also been merged to create the new KY3 district. No change to the existing polling place (Oliver Goldsmith Primary School) is proposed.

The Village School is proposed as the polling place for the KY1 district.

6.13 **Northwick Park ward:**

The new ward is comprised of the existing NNP2, NNP3, NNP4, NNP5 and NNP6, it also takes in a small segment of NSU4.

NP3: A number of potential polling places have been investigated but were found unsuitable or unavailable. We will therefore use the North Wembley Community Seventh-day Adventist Church.

NP1: The Northwick Park Social Club is no longer available. In the May 2021 polls we used the Northwick Park Sports Pavilion and are proposing to remain there for future elections.

No other changes are proposed for the remainder of polling places in the Northwick Park ward.

6.14 **Preston ward:**

The new ward takes in the existing NPR1, NPR2 and NPR3 polling districts along with 51 properties formerly in NPR4.

The properties from NPR4 were merged into NPR2 to create the new NPR2 district.

PR2: The Century Bowling and Social Club, Logan Road is proposed as a replacement to the Hut on Pellat Road. The location has parking for staff and voters as well as disabled access on the ground level, toilets and kitchen facilities

No other changes are proposed for the remainder of the Preston ward.

6.15 **Queens Park ward:**

The new ward takes in all of the existing polling districts for the old Queen's Park ward (HQP1-5) and the entirety of CKG6.

HQP3 and HQP5 have been merged to create QP3. Both HQP3 and HQP5 used Ark Franklin Academy as the polling place.

QP1: The existing CKG6 and HQP2 have been merged to create the new QP1 district. Kensal Rise library falls within the new QP1 district and we therefore propose to use this as the new polling place (instead of Princess Frederica Primary School).

QP3: We propose to use the Moberly Sports Centre as a replacement for Ark Franklin School. It should be noted that wheelchair access to Moberly Sports Centre is via a lift.

QP4: We propose to use Kilburn Library as a replacement for Salusbury Primary School.

No change is proposed for the remaining polling district QP2.

6.16 Queensbury ward:

The new ward is made up of the existing NQY1, NQY3, NQY4 and also takes in parts of NQY2, NKE1, NFR3 and NFR4.

The existing polling districts NKE1, NFR3 and NFR4 have been merged to create QY5. Kingsbury Library Plus to be used as the polling place.

The existing polling districts NQY3 and NQY4 have been merged to create the new QY4 polling district. White Cross Hall to be used as the polling place.

The boundary between the existing NQY1 and NQY2 has been moved to Waltham Drive/Wimbourne Drive for the new QY1 and QY2 districts.

QY2: We propose that we remain at the Hut outside the Arch Climbing Wall.

No other changes are proposed for the remainder of polling places in the Queensbury ward.

6.17 Roundwood ward:

The new ward takes in the existing CHA1, CHA3 and CDU4 polling districts, it also takes in the majority of CHA2 and CWG3 and a small part of CWG1.

Parts of CWG1 has been merged with CDU4 to create the new RW4 polling district.

RW4: Since the last polling district review, we have moved from a temporary polling station in the car park of St Mary's Church into the church itself. This worked satisfactorily and we are therefore propose this arrangement remains in place.

No other changes are proposed for the remainder of polling places in the Roundwood ward.

6.18 **Stonebridge ward:**

The new Ward is made up of the majority of the existing Ward. A small portion of CST6 has been moved into Alperton.

The existing CST1 is cut off from the remainder of the Ward by the North Circular so no changes can be made.

The existing CST2, although small, is also cut off by the North Circular. The alternative way of accessing the remainder of the Ward would require leaving the ward so no changes can be made.

The existing CST6 although small is mainly made up of an industrial site. There are no buildings within the district that are suitable and the current polling place is located in LB Ealing.

The boundary between CST4 and CST5 has been moved to the A404 (Brentfield/Hillside) with the exception of West End Close which would remain in CST5.

We are not proposing any changes to the existing polling places in this ward.

6.19 **Sudbury ward:**

The new ward is made up of the existing NSU1, NSU2 polling districts. It also contains the majority of NSU4 and part of both NSU3 and NSU5.

The LNER Sports & Social club, an existing polling place, would be used for the new SU1 polling district.

SU2: We are proposing to use Sudbury Methodist Church as the polling place for SU2

SU3: We are proposing to use the Shree Jalaram Jyot Mandir Temple Hall instead of Vale Farm Sports Centre as the polling place in this district. This is because Vale Farm is lift only access for wheelchair users. The Shree Jalaram Jyot Mandir Temple Hall is wheelchair accessible as it is located on the ground floor.

SU2 – With the merging of the former NSU1 and NSU3 polling district, the new SU2 district had a number of locations that could be used as a polling place. Sudbury Methodist Church is the proposed polling place for the district as it is located in the middle of the ward, making it accessible to all residents within the district.

No changes are proposed for polling district SU1.

6.20 **Tokyington ward:**

The new ward comprises of CTO3, CTO4 and CTO5. A small portion of NWC1 and NAL2 are also included however, they have no residential properties.

We are not proposing any changes to the existing polling places in this ward.

6.21 **Welsh Harp ward:**

The new ward comprises the entirety of the old Welsh Harp Ward with the addition of NFR6 and portions of NFR4 and NBA4.

The polling districts NBA4, CWH1 and CWH3 were merged to create the new WA4 polling district.

The polling districts NFR4 and NFR6 were merged to create the new WA1 polling district. WA1 will use the Fryent Primary School as the polling place.

We are not proposing any changes to the existing polling places in this ward.

6.22 **Wembley Central ward:**

The new ward is made up of the existing NWC2, NWC3, NWC4 polling districts and parts of NAL2, NSU3 and NSU5.

WC3: Although it falls just outside of the polling district, we are proposing to use Ealing Road Library.

No other changes are proposed for the remainder of polling places in the Wembley Central ward.

6.23 **Wembley Hill ward:**

The new ward takes in the majority of the existing polling districts for NPR4, NWC1 and half of CTO2.

WH2: We propose using Park Lane Methodist Church Hall as the polling place for this new polling district. The Church has disabled access on the ground level, with toilet and kitchen facilities.

No other changes are proposed for the remainder of polling places in the Wembley Hill ward.

6.24 **Wembley Park ward:**

The new ward takes in the existing CTO1 and part of CTO2.

We propose to use Brent Civic Centre as the polling place for the two polling stations in this ward.

6.25 **Willesden Green ward:**

The new ward comprises of WN1, WN2, WN3, WN4. CDU5 and CMA3 have been merged to create the new WN3. CWG2, along with a small portion of CWG3 are now the new WN4.

WN1 is made up of a large portion of CWG1 and a small portion of CWG3. CDU3 has become the new WN2.

We are not proposing any changes to the existing polling places in this ward.

7.0 **Financial Implications**

7.1 The cost of Council elections and by-elections is met by the local authority. For all other elections, funding is provided either by the government or the Greater London Authority.

7.2 Any increase in the number of polling stations would incur additional costs in terms of building hire, equipment and polling station staff. The cost incurred from using Council maintained buildings is limited to covering heating, lighting and cleaning costs. These costs are met by the Council only when used for Council elections or by-elections.

8.0 **Legal Implications**

8.1 Section 18C of the Representation of the People Act (RPA) 1983 (as amended) requires the Council to carry out a review of polling districts and polling places in its area within a period of 16 months of 1 October 2013 and then within a period of 16 months from the 1 October of every fifth year after that. The council may undertake reviews at other time, but in doing so must follow the same process as for a compulsory review in accordance with Schedule A1 of the RPA. This requires the Council to publish its proposals and consult and seek representations from certain prescribed people. Electors may also make representations.

8.2 Once the review is completed the Council must publish its decision together with correspondence and representations made in relation to the review and other prescribed information.

8.3 Section 18B of the RPA requires that local authorities designate the polling places within their Parliamentary constituencies. Under RPA, Returning Officers have the right to use certain public buildings (including schools that receive public funds) for use as polling stations at elections. Section 18B (4) of the RPA states that in conducting a review of polling places the authority:

- a) seek to ensure that all the electors in the constituency have such reasonable facilities for voting as are practicable in the circumstances
- b) seek to ensure that so far as is reasonable and practicable, the polling places they are responsible for are accessible to all electors, including those who are disabled, and when considering the designation of a polling place, must have regard to the accessibility need by disabled persons.

In addition, the polling place for a polling district must be within the area of the district unless circumstances make it desirable to designate an area either wholly or partly outside of the district.

9.0 Equality Implications

- 9.1 The public sector equality duty, as set out in section 149 of the Equality Act 2010, requires the Council, when exercising its functions, to have “due regard” to the need to eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act, to advance equality of opportunity and foster good relations between those who have a “protected characteristic” and those who do not share that protected characteristic. The protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
- 9.2 Having due regard involves the need to enquire into whether and how a proposed decision disproportionately affects people with a protected characteristic and the need to consider taking steps to meet the needs of persons who share a protected characteristic that are different from the needs of persons who do not share it. This includes removing or minimising disadvantages suffered by persons who share a protected characteristic that are connected to that characteristic.
- 9.3 There is no prescribed manner in which the council must exercise its public sector equality duty but having an adequate evidence base for its decision is necessary. The Electoral Commission have issued guidance in respect of accessibility of polling places.
- 9.4 The purpose of the review is to ensure that no elector is discouraged from voting because of any inconvenience placed in his or her way by the choice of polling station location in their area. The accessibility of premises for all electors is taken into consideration as a matter of normal procedure.

10.0 Consultation with ward and stakeholders

- 10.1 As outlined above, the consultation period ran from 25th August to 15th October 2021. Details of the consultation were sent to all members of the Council, to local MPs, and all existing and proposed polling stations. In addition, the consultation was publicised to residents through the Council’s consultation portal, Brent’s Disability Forum members and a wide list of locally-based disability groups and charities.

11.0 Human Resources/Property Implications (if appropriate)

- 11.1 There are no direct human resources or property implications.

Report sign off:

Carolyn Downs
Chief Executive and (Acting) Returning Officer