

North Cotswolds Constituency Labour Party Submission to Tewkesbury Borough Council on the Polling District and Polling Places Review

6 current District Wards within Tewkesbury Borough are now within the North Cotswold Constituency and the Borough Council is currently undertaking a statutory review of Polling Places and Polling Stations which closes on 3 November. This review covers the whole Borough. Details of the Polling Districts and Stations and electors to Polling Station for the 6 District Wards within the new Constituency are given in the table, from information published by the Council.

Borough Ward	Polling District	Polling District Reference	Current Polling Place and/or Polling Station	Electors to Polling Station as at Sept 2023
Badgeworth	Badgeworth (Badgeworth Ward)	BBG	Badgeworth Village Hall GL51 4UJ	836
	Badgeworth (Bentham Ward)	BBN	Witcombe & Bentham Village Hall GL3 4TB	543
	Great Witcombe	GRW	Witcombe & Bentham Village Hall GL3 4TB	64
	Staverton	STV	Portacabin at Staverton Court Farm, Staverton GL51 0TW	530
Brockworth East	Brockworth East 1	BRE1	Brockworth Community Centre GL3 4ET	1356
	Brockworth East 2	BRE2	Brockworth Community Centre GL3 4ET	1258
	Brockworth East 3	BRE3	Brockworth Community Centre GL3 4ET	456
Brockworth West	Brockworth West 1	BRW1	St Patrick's Church Hall, GL3 4HL	1529
	Brockworth West 2	BRW2	St Patrick's Church Hall GL3 4HL	1027
	Brockworth West 3	BRW3	Midglos Indoor Bowls Club GL3 4LS	1417
Churchdown Brookfield with Hucclecote	Churchdown (Brookfield)	CHB	Methodist Church Hall GL3 2ET	2904
	Hucclecote 1	HCC1	Pineholt Village Hall GL3 3SN	1708
	Hucclecote 2	HCC2	Pineholt Village Hall GL3 3SN	395
Churchdown St Johns	Churchdown (St Johns 1)	CHJ1	St John's Church Hall GL3 2DB	1817
	Churchdown (St Johns 2)	CHJ2	St John's Church Hall GL3 2DB	1455
	Churchdown (St Johns 3)	CHJ3	St John's Church Hall GL3 2DB	2041
	Churchdown (St Johns 4)	CHJ4	St John's Church Hall GL3 2DB	300
Shurdington	Shurdington	SHD	Shurdington Community Centre GL51 4TB	1969

Definitions

Polling District: A polling district is a geographical area of a ward (eg a parish or a sub-division of a parish).

Polling Place: The building (usually located in the Polling District) where voters cast their votes.

Polling Station: A specific location within the polling place – eg a polling place might be the community centre or school but the polling station would be a room within the community centre or school.

The legislative requirements of a polling place review¹

Local authorities must comply with the following legislative requirements regarding the designation of polling districts and polling places:

- each parish in England and community in Wales is to be a separate polling district, unless special circumstances apply

¹ <https://www.electoralcommission.org.uk/full-guidance/reviews-polling-districts-polling-places-and-polling-stations>

- 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 the district (for example, if no accessible polling place can be identified in the district).²
- 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.
- Additionally, all polling stations need to meet accessibility requirements.
<https://www.electoralcommission.org.uk/reviews-polling-districts-polling-places-and-polling-stations/legislative-requirements-a-polling-place-review/accessibility-requirements-a-polling-place-review>

Whilst the local authority is responsible for the polling district and places review, there is a statutory appeal process by the Electoral Commission, who have the power to direct the local authority to make different arrangements. There have only been 4 such appeals since 2016.³ Whilst the facts considered by the Commission in each case are probably very different to any Polling District in Tewkesbury, attention is drawn to the Commission's decision South Norfolk District, Saxlingham Nethergate, Norfolk on 7 August 2020. In paragraphs 37 and 38 the Commission set out the factors they considered in a review decision about the location of a proposed polling station for relatively small rural parish, these included the distance from the parish of the new polling station, the lack of public transport, the lack of street lighting on the route to the new polling station and that the local authority could not demonstrate that they had considered suitable alternatives, including mobile polling stations.

Objectives of North Cotswold CLP(NCCLP) response

In considering the response on behalf of the new Constituency Labour Party the objectives have been to improve ease of access to Polling Stations in line with the legislation for Polling Districts and Polling Stations. AS a result NCCLP proposes changes to Polling Districts and new polling stations for the following Polling District, primarily as a result of housing developments which have taken place mainly in the last decade and in anticipation housing growth, based on the

- **Badgeworth BBG** – Additional Polling District and Additional Polling Station to serve development east of Grovefield Road (page 3)
- **Brockworth West BRW3** – Additional Polling District and Additional Polling Station to serve the Coopers Edge Development, (pages 5)
- **Brockworth BRW2** – proposes that an alternative venue of Polling Station be identified (page 6)
- **Brockworth BRW1** – recommends the boundary is addressed to make the polling station more convenient for some voters in the BRW3 area (page but also discussed on pages 4 and 5)

² Section 18(2)(c) states that "the polling place for any polling district shall be an area in that district" and on a page on the Electoral Commission website which defines terms used in polling district reviews "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." (1), The exception in Section 18(2)(c) should I be read as referring to the polling district not to the local authority area.

³ <https://www.electoralcommission.org.uk/reviews-polling-districts-polling-places-and-polling-stations/polling-place-review-appeals-process/past-appeal-decisions>

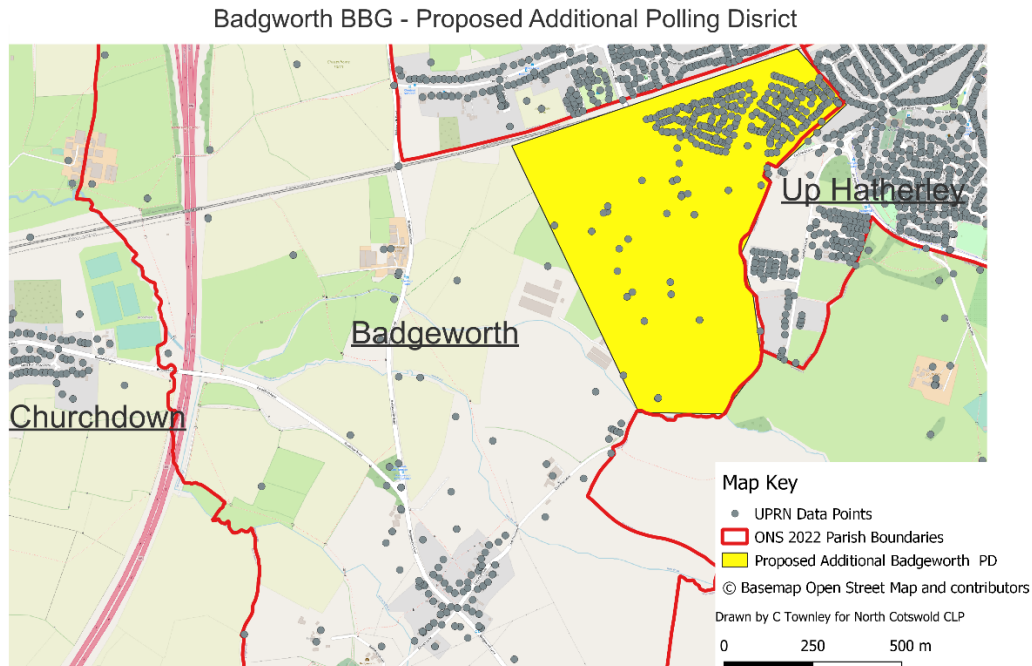
- **Brockworth BRE 1 and 2** proposes the creation of an additional Polling District for primarily the Perrybrook Development and recommends that a new Polling Station be identified as development progresses. (page 6)
- **Churchdown St Johns CHJ3**
- **Shurdington** – Proposes an additional polling district and polling station to serve the Brizen View development on the boundary with Cheltenham (page 7)

In conclusion I would also comment that the suggestions of the Acting Returning Officer should be cautiously considered, as the combining of too many stations, would result in disproportionately long delays due to the new voter ID arrangements. Whilst the Commission has recommended a maximum of 2250 it is for the Council to come to a conclusion on what is the best maximum size. At present the average size of a polling district in the Borough is 922, even after excluding the 45 districts with smaller numbers of electors the average size of mainly urban/larger parish polling districts is 1656.

Additionally, as a recommendation for the future it is suggested that the consultation papers include the Council's proposed changes to districts, rather than just issuing the list of current polling stations. Additionally it is also considered helpful if the Council could publish information on the anticipated population changes over the 5 year statutory period of the review to enable this to be taken into account in considering whether individual districts and polling places need to be change in advance of development.

Chas Townley
Constituency Secretary North Cotswold Labour Party
3 November 2023

Badgeworth BBG - Polling Station: Badgeworth Village Hall, GL51 4UJ



At a first glance this appears to be a centrally located polling station meeting most voters needs, however, on the North Eastern fringe of the area is a relatively recent development (based on UPRN data which suggests this is about 300 dwellings.⁴ This suggests that perhaps 500 electors are concentrated more than 1.3 miles away from the designated Polling Station. There are also geographical issues for voters allocated to this polling station on the northern fringe with Staverton Parish, although it may be impractical to come up with more effective alternatives for them. Consideration should be given to splitting the polling district and establishing a separate polling station adjacent to the development, the boundary shown in yellow on the map above is illustrative rather than definitive and the western boundary will need to be carefully considered. It is possible that the sports pavilion at FC Lakeside would be a suitable location. In default a mobile voting station would need to be considered for this location.

The Geography of this polling district also appears poor for the voters east of Shurdington Road. In the longer term an opportunity to address this arises from the County Divisions review (currently the subject of consultation) but would require consideration to where the boundary line is drawn between the proposed Boundary Commission's Bentham and Badgeworth Wards.

BBN and GRW Witcombe and Bentham Village Hall GL3 4TB

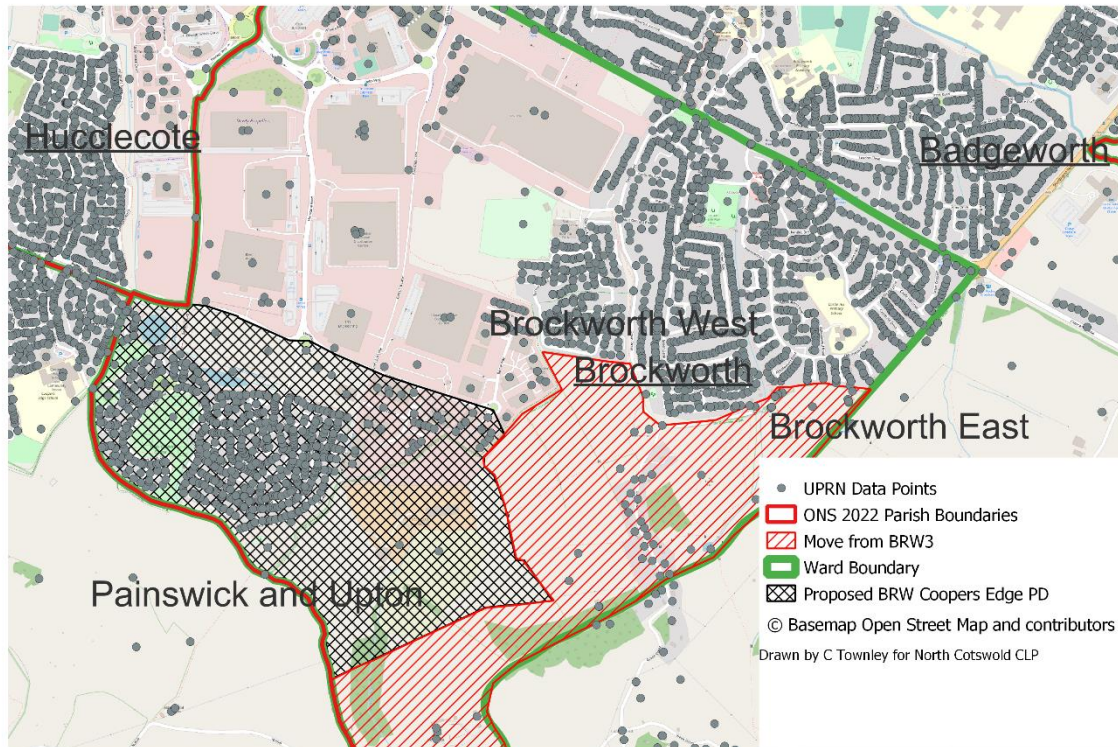
This appears a satisfactory location for these two polling districts at this time, however, the Council should set out the justification for why GRW polling place is not in the polling district.

⁴ The UPRN data is from OS open access data and includes all UPRNs which will include not only residential addresses but also coding for streets, commercial buildings as well as other community assets (eg play areas etc t) these figures are proxies for estimated elector numbers based on 1.72 per UPRN

Brockworth West

BRW3 Polling Station - Midglos Indoor Bowls Club Spinners Road Off Green Street Brockworth Gloucester GL3 4LS

Brockworth West BRW3 - Proposed Additional Polling District



NB: the boundaries shown to the east of Coopers Edge are illustrative but are drawn to include one residential property to the South of the Business Park, details of which can be provided if required.

The current Polling Place is of good quality and is well located for the Spinners Drive development to the south-east of Invista and the existing housing in the Polling District along the northern half of Green Street. Using uncoded UPRN data there are 269 UPRNS in this area, this is likely to represent around 460 electors.⁵

The southern half of Green Street (from Watermead to A46) and Watermeads itself is now isolated for vehicular traffic from the remainder of Green Street due to a Traffic Regulation Order which has now closed this road to motorised traffic. The Catholic Church used for BRW1 is actually nearer than BRW3 polling station and a pragmatic solution might be to move these voters and those along the southern edge of BRW3 into BRW1. There are approximately 50 dwellings in this likely to include approximately 80 electors. This is accepted as being borderline but should be taken into account in any future ward boundary review.

Much of the central area of BRW3 is unpopulated, being part of the Gloucester Business Park and therefore this has limited impact on where people from this area vote, apart from one residential property which has an vehicular access through the Business Park.

⁵ The UPRN data is from OS open access data and includes all UPRNS which will include not only residential addresses but also coding for streets, commercial buildings as well as other community assets (eg Milestone on A46, play areas etc these figures are proxies for estimated elector numbers based on 1.72 per UPRN

The most difficult issue is the western extremity of BRW3 consisting of the housing within the Brockworth Parish part of Coopers Edge. This is geographically distant from the current Polling Station. Measured from Napier Drive the road distance is 1.8 miles. Similarly, the shortest walking is 1.8 miles across the Business Park. There is no shorter route because Golf Course Lane has no access points between the Business Park and Spinners Drive development, meaning there is no sensible alternative walking route to the Polling Station except by Ermin Street. Brockworth Bridleway 60 does provide a potentially shorter route via Spinners Drive, however, this route is in very poor condition and is often very boggy during wet weather, which the County Councillor for the division is seeking to resolve.

Additionally, it should be noted that St Parick's Hall is closer than the Indoor Bowls Centre, but a change of venue for the whole PD does not address the issues of poor access for people, who for the large part are in an urban area and living 1.8 miles travelling distance from the polling station. It should also be noted that the No 8 bus service from Coopers Edge terminates within Whittle Way adjacent to the Whittle Inn.

It is therefore recommended that the roads within the Coopers Edge development within Brockworth West should become a new Polling District and that a polling place within the vicinity of Coopers Edge should be used. There appear to be two options of creating a Polling Station: -

- a) To establish a Polling Station to serve the new Polling District located at either Coopers Edge School or the adjacent Community Centre. This may be difficult for Tewkesbury Borough to stomach as this is outside the Borough but is within the new constituency and both buildings are more or less adjacent to the District Boundary and are much more conveniently located to the voters in this proposed Polling District than the current polling station. It is also a relevant factor to take into account that the community centre and school was built to serve the whole development, which were both built as a result of Section 106 obligations entered into by the consortium of local authorities including Stroud, Tewkesbury and Gloucestershire to achieve a satisfactory development.
- b) If the community centre or school are rejected by TBC, for whatever reason, the council should then consider the provision of a mobile voting centre, possible locations might be on one of the access roads to this area of Gauntlet Way and Buccaneer Avenue.

BRW 2 Polling Station: St Patrick's Church Hall St Patrick's Court Brockworth GL3 4HL

This is a particularly poorly developed Polling District which has no appropriate Polling Station within the Polling District and does not relate well to the settlement pattern. However, this is not really the fault of the LGBC as this somewhat inappropriate ward split was recommended to the Commission by the Borough Council during the consultation process leading to the boundary changes implemented in 2019.

Given the "hard boundaries" that exist to the North, East and West of the Polling District and the area to the south is in unpopulated there is probably no practical alternative but to accept this Polling District "as is", until such time as a review of Borough wards takes place.

Therefore, it is suggested that the Council consider making arrangements for a polling station in the vicinity of the District Centre within the Gloucester Business Park, This could for example be located in Tescos if appropriate space could be found or as an alternative mobile polling station in this general area. Another remote alternative might be to look at the availability of space within the Victoria Inn.

If there are realistically no suitable alternatives, the Community Centre used for BRE1-3 might be considered to be more suitable than St Patricks Hall but it is proposed to continue using St Partrick's Hall the reasons for doing so should be recorded in the report.

BRW 1 Polling Station: St Patrick's Church Hall St Patrick's Court Brockworth GL3 4HL

This appears to be well designed polling district and apart from the recommendation in respect of the southern end of Green Street and Castle Hill discussed in BRW3, no changes are suggested. An option to consider might be to move the remainder of BRW2 to BRW1 but this may result in a large polling station with a risk of long queues to vote as a result of the voter ID requirement.

BRE 1 Polling Station: Brockworth Community Centre Court Road Brockworth Gloucester GL3 4ET

Given the growth in electors within this area it is questioned whether it would be sensible to create a new polling district for both BRE1 and BRE2 for the voters north of the Horsebere Brook with the voters south of the Brook continuing to vote at the Community Centre. At this stage no proposals for a different Polling Place for this area are made, but in the long-term use of a building within Perrybrook should be an expressed aspiration for the Council. An acceptable alternative resolution at this stage might be to agree to an early review, if and when a suitable building becomes available and the main distributor roads through the development have been completed. Possible opportunities for polling places to consider, in addition to the primary and secondary schools within the vicinity of the development, could include Brockworth Sports Centre, the proposed extra care village to be developed by St Monica's Trust (referred to in the Section 106 agreement) as well as Brockworth Rugby Club and also as a last resort the Tithe Barn which is a wedding venue adjacent to Brockworth Court.

BRE 2 Polling Station Brockworth Community Centre Court Road Brockworth Gloucester GL3 4ET

No change is suggested for this polling station, apart from the area north of Horsebere Brook discussed above.

BRE3 Polling Station: Brockworth Community Centre Court Road Brockworth Gloucester GL3 4ET

No change recommended to this Polling District at this time.

Churchdown Brookfield with Hucclecote – no changes are proposed at this time.

Churchdown St Johns – no changes are proposed, although given the population growth at the western end of the polling district CHJ3, an option might be to consider exploring the use of GL3 Community Centre or the Catholic Church situated on Cheltenham Road East as this lies within the area of that Polling District.

SHD - Polling Station: Shurdington Community Centre Bishop Road GL51 4TB

There is now a large housing development on the boundary with Cheltenham which has 396 UPRN which perhaps suggests an electorate of about 700. This is located approximately 1.5 miles away from the Polling Station and therefore consideration should be given to a separate polling district for voters on the east of Shurdington Road with a new polling station – most likely a mobile station. Careful consideration to the boundary to be used east of the road so that people who are close to Shurdington continue to be allocated to the Village will also need to be made. It should also be noted

that allocating voters along Leckhampton Road to this polling district, who do not have any direct vehicular access to the village is also likely to give them a shorter distance to travel.