Brighton & Hove City Council

Council Agenda Item 45

Subject: Partial Review of Polling District and Polling Places 2025

Date of meeting: 13 October 2025

Report of: Elizabeth Culbert, Director Governance and Law

(Monitoring Officer)

Contact Officer: Michael Appleford, Head of Elections, Registration

Services and Local Land Charges

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Ward(s) affected: All

For general release

1. Purpose of the report and policy context

- 1.1 This report deals with the partial review of polling districts and polling places within Brighton & Hove. This partial review seeks to improve polling place provisions after gathering feedback regarding venue suitability following the general election and looking ahead to see what may affect election delivery in the future
- 1.2 The potential need for change was identified at the following polling places:
 - Hove Library, Central Hove
 - St Helen's Church Hall, Hangleton & Knoll
 - The Spire, Kemptown
 - Church of the Good Shepherd Hall, North Portslade
 - Whitehawk Library, Whitehawk & Marina
 - Woodingdean Library, Woodingdean
- 1.3 A full statutory review of all polling districts and polling places took place in autumn 2023 with changes made in January 2024. The council is required to keep all polling districts and polling places under review.

2. Recommendations

- 2.1 That the Council agrees the revised polling district and polling place schemes outlined in Appendix 3
- 2.2 That the Council delegates authority to the Director Governance and Law to take all measures as are necessary or incidental, as required by law, to implement the changes indicated in para 2.1.
- 2.3 That the Council delegates authority to the Returning Officer to designate alternative polling places, in the event of any polling place being unavailable, at any poll taking place prior to the next review of polling places, subject to consultation with Group Leaders and respective ward Councillors.

3. Context and background information

- 3.1 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 for UK Parliamentary elections. It must keep these arrangements under review and undertake a full review of all polling districts and polling places within the period of 16 months that starts on 1 October of every fifth year after 1 October 2013.
- 3.2 The (Acting) Returning Officer is responsible for administering parliamentary elections. At Brighton & Hove this is the Chief Executive. The (Acting) Returning Officer must be consulted and comment on polling district and polling place reviews.
- 3.3 When assessing changes to the polling scheme, the design principles introduced in 2022 continue to be used. These are:
 - assign a polling place to each polling district and elector
 - ensure polling places are nearby to electors and located close to public transport routes and local amenities, so far as is reasonable and practicable
 - ensure every polling place has step free access or can be provided with a ramp, so far as is reasonable and practicable
 - help facilitate the safe and efficient administration and delivery of local and parliamentary elections
 - have a high proportion of double/triple stations this will enable polling places to benefit from a higher proportion of senior staff who can resolve issues.
 - ensure most polling stations have between 1,250 to 1,750 polling station electors - this will ensure that polling stations are not too busy or quiet, staffing resources are best utilised and Electoral Commission ratios do not require further polling station splits.
 - where possible, limit the use of schools
 - avoid the use of temporary buildings

4. Analysis and consideration of alternative options

- 4.1 After the 2025 general election, the Electoral Services team collated feedback from polling station staff, polling station inspectors and electors, and looked ahead to see what may affect election delivery in the future. They identified 6 polling places that required review.
- 4.2 Potential new polling places were researched and visits undertaken to assess their suitability in line with the design principles outlined in 3.3. Where the location of the alternative venue required changes to polling district boundaries the distance to the polling station, topography and availability of public transport were considered. Officers also considered the necessity of making changes with familiarity and consistency of polling place being highly beneficial to electors knowing where they should go to vote.

- 4.3 A scheme and consultation document were published (see Appendix 1) and consulted on during September. Appendix 2 provides all the responses received during the consultation and the (Acting) Returning Officer's comments on these.
- 4.4 Most responses were neutral or positive about the changes. The responses which did not agree with the proposals or offered alternatives are summarised below:
 - A request was made to return Blatchington Windmill to the scheme instead of Hounsom Memorial Church Hall. The responder also stated that church halls and schools should not be used as polling places. Hounsom Memorial Church Hall is situated in the centre of the polling district and is located next to amenities of the local area. Blatchington Windmill was removed from the scheme as part of the 2022 review due to its unfavourable location on the periphery of the ward. The Returning Officer agrees, in line with the design principles, that schools should be avoided where possible. Churches and church halls are a key type of venue that support the Brighton & Hove polling station scheme. If these buildings are not utilised, then available polling venues would be severely limited.
 - A request was made that a polling station for KKTX was found within the
 polling district and ward. The Returning Officer and their staff have
 researched venues across the area but no suitable alternatives have
 been identified. No alternative venue was identified by the responder.
 Should a suitable alternative space be found in the future then this can
 be considered at a subsequent review.
 - A response proposed an additional polling place and district for the Bristol Estate. The Bristol Estate Community Centre was removed from the scheme as part of the council's comprehensive review of polling places in 2022. This change was agreed in line with the design principles of that review, which are still in place for this partial review in 2025. A polling station for the Bristol Estate would serve a very small number of electors and would be out of step with the rest of the scheme. Manor Gym, which is situated on the eastern part of the estate, is served by the number 37 bus, and has full level access and residents parking bays.
 - A further response proposed a new polling station for north Whitehawk in Kingfisher Community Room. This area is currently served by St Cuthman's - which is in a prime central location for this polling district, with its own bus stop on Whitehawk's main through road. The Kingfisher Community Room is on the periphery of the polling district which would result in a longer walk for some electors. Moreover, Cabinet have agreed in principle that their preferred option for addressing the structural and strengthening issues of Kingfisher Court is demolition.
 - The final response stated that there were poor public transport links to the polling station for voters in the east of the KWOX district. This comment has been noted and will form part of any subsequent review.

5. Community engagement and consultation

5.1 The consultation period for this review ran from 26 August to 28 September 2025. Public notice of the review was given, and information about the

review was made available on the Council's website and on the Council's consultation portal. Electors residing in the Brighton Kemptown and Peacehaven, and Hove and Portslade constituencies were invited to make representations. Hard copies of the consultation document were available on request.

- 5.2 The consultation paper, together with maps of each reviewed ward showing the polling district boundaries, can still be viewed on the Council's website at: Partial Review of Brighton & Hove Polling Districts and Places 2025
- 5.3 Ward Councillors, Members of Parliament, local political parties and several Equalities, Diversity and Inclusion groups were sent the consultation documents for feedback.
- 5.4 14 comments were received in response to the consultation. These are summarised in Appendix 2 along with responses from the (Acting) Returning Officer

6. Financial implications

6.1 There are no material financial implications arising from the report. Any costs arising from the review are expected to be met within existing resources

Name of finance officer consulted: Ishemupenyu Chagonda Date consulted 01/10/2025

7. Legal implications

- 7.1 Under sections 18A to 18E of the Representation of the People Act 1983 as amended by the Electoral Registration Act 2006, local councils are required to keep the designation of polling places and polling districts under review. In doing so they must act so as to give all electors in their area such reasonable facilities for voting as are practicable in the circumstances
- 7.2 In a Leader/Cabinet governance model, Council must exercise the functions in relation to electoral matters

Name of lawyer consulted: Elizabeth Culbert Date consulted 01/10/25

8. Risk implications

- 8.1 Not regularly reviewing and updating the polling place scheme brings significant risks to election delivery with the potential for venues to be unavailable or inaccessible at scheduled and unscheduled polls. This can result in unsatisfactory polling arrangements being in place for some electors.
- 8.2 As can be seen with this review, a change of polling places can result in the need to redraw polling districts to ensure the venue serves the correct electors. It is best to make these changes during the annual electoral

registration canvass to allow the Electoral Registration Officer to make changes to the structuring of the electoral register. Delaying the changes until closer to a poll can result in there being limited time to make the structural changes required before the election printing timetables begin.

9. Equalities implications

- 9.1 The Council is required to have due regard to its public sector equality duties (section 149 of the Equality Act 2010) in the exercise of all its functions. Advancing equality of opportunity by ensuring that steps are taken to facilitate the electorate's exercise of their right to vote is a clear imperative. As a result, the Council must ensure that, so far as is reasonable and practical, every polling place for which it is responsible is accessible.
- 9.2 The (Acting) Returning Officer and their staff actively seek suitable venues. However, in some cases a polling place may not have step free access. In these situations, the (Acting) Returning Officer will provide the polling place with a ramp or will work with the venue to find an alternative measure.
- 9.3 The consultation document along with an email encouraging a response was sent to the Equalities, Diversity and Inclusion team's list of public contacts. This included Possibility People, a local charity set up to support and involve disabled people in issues affecting their lives.
- 9.4 The Returning Officer is completing an EIA. The draft has identified that young people at school could be disproportionately impacted should a school choose to close when used as a polling place. This could be mitigated by INSET days and/or the Returning Officer avoiding the use of schools.

10. Sustainability implications

- 10.1 The continued reduction in polling places should result in the decrease of energy use to heat and light venues. It also allows the Returning Officer to reduce the amount of printed materials for display in polling places. The double stations can allow for polling station staff to share transport to the venue.
- 10.2 Ensuring, polling places are nearby to electors and located close to public transport routes and local amenities, should reduce the need for voters to use private transport to attend their polling station.

11. Conclusion

11.1 The Council is required to designate suitable polling places which satisfy the (Acting) Returning Officer's requirements. The proposed changes provide more than satisfactory arrangements. Approval of these changes will allow the Electoral Registration Officer and Returning Officer to continue their preparations for the potential Sussex Combined County Authority Mayor election in May 2026.

Supporting Documentation

1. Appendices

- 1. Appendix 1 Partial Review of Brighton & Hove Polling Districts and Places Consultation Paper and (Acting) Returning Officer Comment
- 2. Appendix 2: Responses to the Full Review of Brighton & Hove Polling Districts and Places Consultation Paper and (Acting) Returning Officer Comment
- 3. Appendix 3 New Brighton & Hove Polling Districts and Places Schemes