

Review of Polling Districts and Polling Places in the Borough of Eastbourne

Consultation document for a full review 2023

**Consultation period runs from
2nd October to 3rd November 2023**

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Contact information:

Information on who can make representations and where to address representations is given on pages 5 of this consultation document.

If you want to talk to someone about this review, require further information or want information about any other electoral matter please contact:

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If you wish to receive this consultation document in an alternative format, such as large print, please let us know by contacting Electoral Services:

- E-mail: elections@lewes-eastbourne.gov.uk
- Telephone: (01323) 415036

1. Background to this review

The council must regularly review the division of its area into polling districts and the places where electors are asked to vote. A full review of the whole borough must be undertaken at intervals of not less than 5 years. A review must also be undertaken when a change in a particular polling place is proposed to be made.

The relevant legislation can be found in section 16 of the Electoral Administration Act 2006 (as amended), the Representation of the People Act 1983 and the Review of Polling Districts and Polling Places (Parliamentary Elections) Regulations 2006. Guidance is also published by the Electoral Commission.

The council's last full review was carried out in 2018 and approved by the council in November of 2018.

Further information about the procedures for making representations is given later in this paper and the detailed proposals, including proposals for change, are set out in the appendix.

2. Definitions

“Parliamentary constituency”. This cannot be changed by the review. It is the division of the constituency into polling districts and places that is the subject of the review. It should be noted that following the conclusion of the 2023 Parliamentary Boundary Review, the Eastbourne constituency is now coterminous with the Borough boundary of Eastbourne. The Willington, Jevington and Wannock areas of Wealden that used to form part of the Eastbourne Constituency are no longer part of the new Eastbourne constituency.

“Polling district”. The area created by the division of a constituency or ward into smaller parts, within which a polling place can be determined which is convenient to the electors.

“Polling place”. The building or area in which polling stations will be selected by the Returning Officer.

“Polling station”. The actual area where the process of voting takes place. This must be located within the polling place and designated for the particular polling district. This function is the responsibility of the Returning Officer.

3. The review process

As part of the review process the council must:

- Seek to ensure that all electors in the constituency have such reasonable facilities for voting as are practicable in the circumstances;
- Seek to ensure that so far as is reasonable and practicable the polling places are accessible to those who are disabled, and
- When considering or reviewing the designation of a polling place, have regard to the accessibility needs of disabled people.

The council is required to publish notice of the holding of a review. Information about the review is made available on the council's website and can also be obtained in person from Electoral Services at the Town Hall, Eastbourne.

The consultation document will also be sent to the local Member of Parliament, Borough and County Councillors and local political parties. It will also be sent to persons who have particular expertise in relation to access to premises or facilities for persons who have different forms of disability.

The consultation period for this review will last for 5 weeks. This is considered to be sufficient given that minimal change is proposed.

The timetable for this review is set out below:

Publication of notice	2 October
Publication of consultation document including Returning Officer's proposals	2 October
Closing date for representations.	3 November
Final proposals published (as part of the agenda papers for meeting of the council on 14 November 2018. These will be available on the Council's website.	7 November
Council approves revised scheme.	15 November

4. The role of the Returning Officer

The Council is required to consult the Returning Officer for every Parliamentary constituency that is wholly or partly within its area. This consultation document contains the proposals made by the Returning Officer for the Eastbourne parliamentary constituency.

5. Proposals

The appendix to this consultation document sets out details of current polling district and polling places for each of the 9 wards in the Borough of Eastbourne and details of any proposed changes.

6. Making representations

Any elector in the Eastbourne parliamentary constituency may make representations to the Council.

Representations will also be considered from persons who have particular expertise in relation to access to premises or facilities for persons who have different forms of disability.

We would encourage anyone making representations to suggest alternative polling districts/places to those proposed where appropriate and to give reasons for the alternative.

Any representations must be received by **5pm Friday 3 November 2023**.

All Representations should be addressed to:

Polling Place Review
Electoral Services
Eastbourne Borough Council
Town Hall
Grove Road
Eastbourne
BN21 4UG

If you prefer you can email your representations (with the words "Polling Place Review" in the subject line) to elections@lewes-eastbourne.gov.uk

All representations received will be published on the Council's website as soon as possible after receipt, even if you have already commented on the proposals, you may make further submissions in response to views and comments you see on the website, provided these are received no later than the consultation closing date on 3 November 2023. You can view this document, together with maps showing the ward and polling district boundaries at:

<http://lewes-eastbourne.gov.uk/consultations/>

7. Completion of the review

A report will be submitted to a meeting of the Full Council on 15 November 2023. The Council will be asked to consider the Returning Officer's proposals and any representations received and make a final decision. The council is required to give reasons for its decisions in respect of the designation of both polling districts and polling places.

Revisions to any electoral register comprising a revised polling district will be made when the new register is published on 1 December 2023.

In addition, the council must publish:

- all correspondence sent to the Returning Officer in connection with the review and all correspondence sent to any person who the council 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 meetings held by the council where details of the review have been considered;
- details of the actual designations of polling districts and polling places agreed as a result of the review; and
- details of where the results of the review have been published.

8. Challenging the outcome of the review

Although the Electoral Commission has no initial role in the review process itself, it does have an important role in respect of considering representations and observations, that a council has not conducted a review so as to:

- meet the reasonable requirements of the electors in the constituency, or a body of them (i.e. that the reasonable requirements of a particular area of the authority have not been satisfactorily met); or
- take sufficient account of the accessibility of polling stations within a designated polling place, for disabled people.

9. Who may make a representation to the Electoral Commission?

The following may make representations to the Electoral Commission namely;

- not less than 30 registered electors in the constituency
 - any person who made representations to the council when the review was being undertaken (except the Returning Officer)
 - any person who is not an elector within the constituency who the Electoral Commission feel has sufficient interest in the accessibility of disabled people;
- Also the Returning Officer may make observations on any representations made to the commission.

10. Review by the Electoral Commission

The Electoral Commission is required to consider any such representations and observations, and after doing so, may direct the relevant council to make any alterations it sees necessary to the polling places designated by the review.

Should a council fail to make the alterations within two months of the direction being given, the Commission may make the alterations itself.

Appendix 1

Review of Polling Districts and Polling Places in the Borough of Eastbourne

Proposals Document

Electorate as at 1 September 2023

Devonshire Ward

Polling District	Polling Station	Polling Place	Polling Station Electorate:	No of Postal Voters	Returning Officer Comments and Proposals
DVA	All Souls Parish Room, Wellesley Road, Eastbourne, BN21 3RJ	Devonshire	2,185	356	Located within the polling district. Easily accommodates the required single polling station. Good disabled access. Suitable lighting inside and out. Parking is very limited. Have not received any complaints about this venue.
DVB	Eastbourne Blind Society, 124-142 Longstone Road Eastbourne, BN22 8DA	Devonshire	2,029	377	Located within the polling district. Easily accommodates the required single polling station. Good disabled access. Suitable lighting inside and out. Parking is very limited. Have not received any complaints about this venue.
DVC	St Agnes Hall, Whitley Road, Eastbourne, BN22 8NJ	Devonshire	2,161	407	Located just outside of the Polling District boundary (in SAA). Easily accommodates the required single polling station. Good disabled access. Suitable lighting inside and out. Parking at the rear of the building. Have not received any complaints about this venue.
DVD	Archery Youth Centre, Archery Recreation Ground, Seaside, BN22 7RR	Devonshire	1,858	412	Located just outside of the Polling District boundary (in SAC) and is used as double polling station with St Anthony's (SAB). Large hall and small hall. Good disabled access. Suitable lighting inside and out. Parking at the rear of the building. Have not received any complaints about this venue.

Returning Officer's proposal: There are no proposals to change any of the stations in this ward. To continue to designate the whole of **Devonshire Ward** as the polling place.

Reasons: If a polling station becomes unavailable at any time, we can conduct an internal review to locate the most suitable venue to serve the voters in the area and where there is only one choice, this mitigates the need to conduct a full public consultation.

Hampden Park Ward

Polling District	Polling Station	Polling Place	Polling Station Electorate:	No of Postal Voters	Returning Officer Comments and Proposals
HPA	Hampden Park Community Centre, Brodrick Road, Eastbourne, BN22 9NR	Hampden Park	1,681	369	Located within the polling district. Easily accommodates the required single polling station. Good disabled access. Suitable lighting inside and out. Have not received any complaints about this venue
HPB	St Peter's Church Hall, The Hydneye, Eastbourne, BN22 9BY	Hampden Park	2,821	480	Located within the polling district. Easily accommodates the required single polling station. Good disabled access. Suitable lighting inside and out. Have not received any complaints about this venue
HPC	Willingdon Trees Community Centre, Holly Place, Maywood Avenue, Eastbourne, BN22 0UT	Hampden Park	1,949	341	Located within the polling district. Easily accommodates the required single polling station. Good disabled access. Suitable lighting inside and out. Parking good. Have not received any complaints about this venue.

Returning Officer's proposal: There are no proposals to change any of the stations in this ward. To continue to designate the whole of **Hampden Park Ward** as the polling place.

Reasons: If a polling station becomes unavailable at any time, we can conduct an internal review to locate the most suitable venue to serve the voters in the area and where there is only one choice, this mitigates the need to conduct a full public consultation.

Langney Ward

Polling District	Polling Station	Polling Place	Polling Station Electorate:	No of Postal Voters	Returning Officer Comments and Proposals
LGA	St Barnabas United Church, Kingfisher Drive Eastbourne, BN23 7RA	Langney	1,246	325	Located within the polling district. Easily accommodates the required single polling station. Good disabled access. Suitable lighting inside and out. Good Parking. Have not received any complaints about this venue
LGB	Shinewater Community Centre, Milfoil Drive, Eastbourne, BN23 8ED	Langney	3,521	683	Located within the polling district. Easily accommodates the required single polling station. Good disabled access. Suitable lighting inside and out. Good Parking. Have not received any complaints about this venue
LGC	Langney Sport Club, Priory Road, Eastbourne, BN23 7QH	Langney	1,527	401	Located within the polling district. Easily accommodates the required single polling station. Good disabled access. Suitable lighting inside and out. Good Parking. Have not received any complaints about this venue

Returning Officer's proposal: There are no proposals to change any of the stations in this ward. To continue to designate the whole of **Langney Ward** as the polling place.

Reasons: If a polling station becomes unavailable at any time, we can conduct an internal review to locate the most suitable venue to serve the voters in the area and where there is only one choice, this mitigates the need to conduct a full public consultation.

Meads Ward

Polling District	Polling Station	Polling Place	Polling Station Electorate:	No of Postal Voters	Returning Officer Comments and Proposals
MDA	St Saviour's Church Hall, Spencer Road, Eastbourne, BN21 4UT	Meads	2,316	628	Located within the polling district. Easily accommodates the required single polling station. Good disabled access. Suitable lighting inside and out. Good Parking. Have not received any complaints about this venue
MDB	All Saints' Church Hall, Grange Road, Eastbourne, BN21 4HE	Meads	1,620	577	Located within the polling district. Easily accommodates the required single polling station. Good disabled access. Suitable lighting inside and out. Good Parking. Have not received any complaints about this venue.
MDC	Current Venue: St John's Parish Hall, Meads Street, Eastbourne, BN21 7QL	Meads	2,324	925	Located within the polling district. Easily accommodates the required single polling station. Reasonable disabled access. Suitable lighting inside and out. Parking is very limited.
	Proposed New Venue: St John The Evangelist Jubilee Church Hall, Staveley Road, Eastbourne, BN20 7ND				A representation has been received from an elector on behalf of her disabled husband requesting a relocation to the Church's Jubilee Hall. Change from using St Johns Parish hall, Meads Street that is being considered for sale by the church, has poor accessibility entrances along a dark overgrown path, very limited parking and move to a modern venue within the grounds of St Johns church in Staveley Road, improved access for disabled electors, better parking, improved internal and external lighting, a more modern venue with better facilities for electors and staff , better disabled access and improved on street parking. Proposal accept Jubilee Church Hall as the new venue for MDC.

Returning Officer's proposal: To accept the proposal to move MDC to St John The Evangelist Jubilee Church Hall, Staveley Road, Eastbourne, BN20 7ND from 2023. There are no proposals to change either of the other stations in the ward. To continue to designate the whole of **Meads Ward** as the polling place.

Reasons: If a polling station becomes unavailable at any time, we can conduct an internal review to locate the most suitable venue to serve the voters in the area and where there is only one choice, this mitigates the need to conduct a full public consultation.

Old Town Ward

Polling District	Polling Station	Polling Place	Polling Station Electorate:	No of Postal Voters	Returning Officer Comments and Proposals
OTA	Current Venue: Eastbourne Grace Baptist Church, Victoria Drive, Eastbourne, BN20 8JS	Old Town	2,877	703	Emmanuel Church remained available until 2021 and in 2023 the decision was made that due to the Covid Pandemic it would not be feasible to use the Care Home venue selected as part of the 2018 Polling Places Review, Upwyke House as the new venue. Eastbourne Grace Baptist Church was used for the 2023 elections. The venue has two rooms accommodating OTA in the main church area and OTD in the very small hall. The main church entrance has good disabled access. Suitable lighting inside and out. On street parking. Look at combining both stations in the main hall for easier and level access for disabled electorate.
	Previous Venue: Emmanuel Church (formerly known as Greenfield Methodist Church Hall,) Greenfield Road, Eastbourne, BN21 1JJ				
OTB	Old Town Community Centre, Central Avenue, Eastbourne, BN20 8PL	Old Town	1,769	325	Located within the polling district. Easily accommodates the required single polling station. Good disabled access. Suitable lighting inside and out. Have not received any complaints about this venue.
OTC	Victoria Baptist Church Hall, Eldon Road, Eastbourne, BN21 1UE	Old Town	1,331	347	Located within the polling district. Easily accommodates the required single polling station. Good disabled access. Suitable lighting inside and out. Good parking. Have not received any complaints about this venue.
OTD	Current Venue: Eastbourne Grace Baptist Church, Victoria Drive, Eastbourne, BN20 8JS	Old Town	626	322	Emmanuel Church remained available until 2021 and in 2023 the decision was made that due to the Covid Pandemic it would not be feasible to use the Care Home venue selected as part of the 2018 Polling Places Review, Upwyke House as the new venue.

	<p>Previous Venue: Emmanuel Church (formerly known as Greenfield Methodist Church Hall,) Greenfield Road, Eastbourne, BN21 1JJ</p>				<p>Eastbourne Grace Baptist Church was used for the 2023 elections. The venue has two rooms accommodating OTA in the main church area and OTD in the small hall. The small hall has a ramped entrance for disabled access. Suitable lighting inside and out. On street parking. Look at combining both stations in the main hall for easier and level access for disabled electorate.</p>
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Returning Officer's proposal: To confirm Eastbourne Grace Baptist Church, Victoria Drive, Eastbourne, BN20 8JS as the new polling station for OTA and OTD and if possible the main hall be used for both OTA and OTD. To continue to designate the whole of **Old Town Ward** as the polling place.

Reasons: If a polling station becomes unavailable at any time, we can conduct an internal review to locate the most suitable venue to serve the voters in the area and where there is only one choice, this mitigates the need to conduct a full public consultation.

Ratton Ward

Polling District	Polling Station	Polling Place	Polling Station Electorate:	No of Postal Voters	Returning Officer Comments and Proposals
RNA	Current Venue: Broadway United Church, The Broadway, Eastbourne, BN22 0AS	Ratton	911	271	Venue moved to be a joint station in Broadway United Church as Oakwood School no longer available in Dec 2019 after consultation with the Ward Cllrs. Located within the polling district. Easily accommodates the required double polling station. Good disabled access. Suitable lighting inside and out. Good parking. Some confusion with voters having to be directed to the correct part of the polling district to vote. Propose amalgamating the two polling districts RNA and RNB into one station to prevent voter confusion This will also have staffing and equipment cost savings.
	Previous Venue: Oakwood Primary School, Magnolia Drive, Eastbourne, BN22 0SS				
RNB (RNA)	Broadway United Church, The Broadway, Eastbourne, BN22 0AS	Ratton	1,250	502	Located within the polling district. Easily accommodates the required double polling station. Good disabled access. Suitable lighting inside and out. Good parking. Have not received any complaints about this venue. Propose amalgamating the two polling districts RNA and RNB to be known as RNA into one Polling District. This means we will only have one polling station within Broadway United Church. This will also have staffing and equipment cost savings.
RNC (RNB)	Current Venue: Willingdon Golf Club, Southdown Road, Eastbourne, BN20 9AA	Ratton	1,682	632	In 2023 following the Covid Pandemic the decision was made to relocate the RNC polling station to Willingdon Golf Club, which is a much larger venue with good disabled access and more parking including accessible parking, after consultation with the Ward Cllrs. Located within the polling district. Easily accommodates the required single polling station. Suitable lighting inside and out. No complaints were received about the new venue. Proposal to continue to use Willingdon Golf Club as the RNB/C venue. If the above proposal is agreed RNC would be renamed RNB.
	Previous Venue: Back Room, The Red Lion Pub, Wish Hill, Eastbourne, BN20 9HQ				
RND (RNC)	St Clements Court, Framfield Way, Eastbourne, BN21 2QZ	Ratton	1,494	599	Located within the polling district. Easily accommodates the required single polling station. Reasonable disabled access. Suitable lighting inside and out. Parking is very limited. Have not received any complaints about this venue. If the above proposals

					are accepted the RND will be renamed RNC.
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Returning Officer's proposal: Amalgamate RNA and RNB into one polling district to remain at Broadway United Church to be known as RNA. RNC to become RNB and RND to become RNC. Willingdon Golf Club remain as the venue for the new RNB polling district. To continue to designate the whole of **Ratton Ward** as the polling place.

Reasons: If a polling station becomes unavailable at any time, we can conduct an internal review to locate the most suitable venue to serve the voters in the area and where there is only one choice, this mitigates the need to conduct a full public consultation.

St Anthony's Ward

Polling District	Polling Station	Polling Place	Polling Station Electorate:	No of Postal Voters	Returning Officer Comments and Proposals
SAA	Suncoast Church, 3 Courtlands Road, Eastbourne, BN22 8TR	St Anthony's	1,764	382	Located within the polling district. Easily accommodates the required single polling station. Reasonable disabled access. Suitable lighting inside and out. Good Parking. Have not received any complaints about this venue.
SAB	Archery Youth Centre, Archery Recreation Ground, Seaside, BN22 7RR	St Anthony's	1,075	196	Located just outside of the Polling District boundary and is used as double polling station with Devonshire (DVD). Large hall and small hall. Good disabled access. Suitable lighting inside and out. Parking at the rear of the building. Have not received any complaints about this venue. Have had problems in the past with confusion over which entrance to use for each station but have improved this over time with improved signage.
SAC	St Andrew's Parish Hall, Seaside, Eastbourne, BN22 7RT	St Anthony's	1,227	217	Located within the polling district. Easily accommodates the required single polling station. Reasonable disabled access. Suitable lighting inside and out. Parking. Have not received any complaints about this venue.
SAD	Current Venue: Langney Village Hall, Etchingham Road, Eastbourne, BN23 7DR	St Anthony's	2,812	734	The use of Langney Community Centre requires the café and Food Bank to be closed on election day. St Richard's Church Hall is located within the polling district. Easily accommodates the required single polling station. Good disabled access. Suitable lighting inside and out. Good Parking. More modern venue, with less inconvenience to the local community. Proposal to move the SAD venue to St Richard's Church Hall
	Proposed Venue: St Richard's Church Hall, Priory Road, Eastbourne, BN23 7AX TBC				

Returning Officer's proposal: To accept St Richard's Church Hall as the new venue for SAD, to alleviate the need to close the cafe and Food Bank at Langney Village Hall on election day. To continue to designate the whole of **St Anthony's Ward** as the polling place.

Reasons: If a polling station becomes unavailable at any time, we can conduct an internal review to locate the most suitable venue to serve the voters in the area and where there is only one choice, this mitigates the need to conduct a full public consultation.

Sovereign Ward

Polling District	Polling Station	Polling Place	Polling Station Electorate:	No of Postal Voters	Returning Officer Comments and Proposals
SVA	Christ the King Catholic Church Hall, Princes Road, Eastbourne, BN23 6HT	Sovereign	2,676	852	Located within the polling district. Easily accommodates the required single polling station.
SVB	The Haven School, Atlantic Drive, Eastbourne, BN23 5SW	Sovereign	1,683	429	Located within the polling district. Easily accommodates the required single polling station. Reasonable disabled access. Suitable lighting inside and out. Parking is not great as the school will not allow voters to park within the school. Have not received any complaints about this venue.
SVC	Current Venue: Sovereign Harbour Community Centre, The Crumbles, BN23 6JH	Sovereign	2,132	777	The venue was moved to Sovereign Harbour Community Centre when it opened in 2019 in accordance with the 2018 Review. Located within the polling district. Easily accommodates the required single polling station. Good Disabled vehicle access via different access road. Good disabled access, suitable lighting inside and out and parking. There have been no complaints about this venue. Two large halls available.
	Previous Venue: Sovereign Harbour Yacht Club, 3 Harbour Quay, Eastbourne, BN23 5QF				
SVD (SVC)	Conqueror Hall, Horsa Close, Eastbourne, BN23 6TL	Sovereign	677	108	<p>Located within the polling district. Easily accommodates the required single polling station. Suitable lighting inside and out. Good Parking.</p> <p>However this station is our most expensive costing £640 to hire at todays rates, it is 1/3 more to hire than the next costliest, it has a very small electorate and very low turnout at every election since 2015</p> <p>12.10% turnout of 76 voters in 2016 PCC, 16.81% turnout of 117 voters 2019 Borough Election 14.79% turnout of 100 voters 2023 Borough Election</p>

					<p>Costs were £6.40p per vote at 2023 Borough Election compared with less than 0.10p at our cheapest Polling station based on venue hire cost only, not including staff wages, tablet hire or ballot printing costs.</p> <p>Prior to 2015 SVD formed part of SVC and it is recommended that we revert back to this and amalgamate SVD back into SVC. Significant savings on staff, equipment, delivery and hire costs.</p>
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Returning Officer's proposal: Proposal to merge SVD back into SVC. To continue to designate the whole of **Sovereign Ward** as the polling place.

Reasons: SVD is a small polling district of approx. 600 voters, has a historically very low turnout and the hire of the hall is our most expensive in the Borough, merging the two will offer savings with little difference to voters, who can easily access their community centre.

If a polling station becomes unavailable at any time, we can conduct an internal review to locate the most suitable venue to serve the voters in the area and where there is only one choice, this mitigates the need to conduct a full public consultation.

Upperton Ward

Polling District	Polling Station	Polling Place	Polling Station Electorate:	No of Postal Voters	Returning Officer Comments and Proposals
UPA	<p>Current Venue: The Hub on the Hill, in the grounds of St Michael and All Angels Church, Willingdon Road, Eastbourne BN21 1TN</p>	Upperton	1,392	384	<p>The previous 2018 Review agreed that we would use The Hub on the Hill in the grounds of St Michael and All Angels until such time as Upperton United (now renamed New Emmanuel Church) reopened.</p> <p>The new venue is now open and we wish to move UPA voters back to this new and improved venue. We are waiting to arrange a site visit, but do not envisage any issues with moving to this new venue.</p>
	<p>Proposed Venue: New Emmanuel Church, Upperton Road, Eastbourne, BN21 1LQ</p>				
UPB	St Thomas a Becket Junior School, Tutts Barn Lane, Eastbourne, BN22 8XT	Upperton	2,170	550	Located within the polling district. Easily accommodates the required single polling station. Reasonable disabled access. Suitable lighting inside and out. Parking. Have not received any complaints about this venue
UPC	Town Hall, Grove Road, Eastbourne, BN21 4UG	Upperton	719	239	Located within the polling district. Easily accommodates the required single polling station. Reasonable disabled access. Suitable lighting inside and out. Parking. Have not received any complaints about this venue
UPD	Elim Family Centre, Hartfield Road, Eastbourne, BN21 2AD	Upperton	2,008	450	Located within the polling district. Easily accommodates the required single polling station. Reasonable disabled access. Suitable lighting inside and out. Have not received any complaints about this venue

UPE	The Old Parsonage Barn, St Mary The Virgin Parish Church, Ocklynge Road, Eastbourne, BN21 1PW	Upperton	439	116	Located within the polling district. Easily accommodates the required single polling station. Reasonable disabled access. Suitable lighting inside and out. Parking. Have not received any complaints about this venue
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Returning Officer's proposal: Revert to Emmanuel Church (Formerly Upperton United Reformed Church) for UPA voters. To continue to designate the whole of **Upperton Ward** as the polling place.

Reasons: If a polling station becomes unavailable at any time, we can conduct an internal review to locate the most suitable venue to serve the voters in the area and where there is only one choice, this mitigates the need to conduct a full public consultation.