Response to the LGBCE Consultation – Ward Boundary Changes and Increase in Council Size

Comments from Electoral Registration Officer, Returning Officer and Electoral Services Manager.

From an electoral administration perspective, the proposed ward boundary changes and increase in council size would have significant operational implications for the delivery of elections and the maintenance of the electoral register.

It is noted that the proposals stem from a single submission made during the initial consultation, rather than from evidence of a broader operational or electoral need for change across the authority. Whilst the Commission's recommendations are necessarily based on the representations it receives, the limited number of responses to the consultation does not indicate widespread support for changes of this scale and could in fact be interpreted as support for the status quo. In the absence of stronger evidence demonstrating a clear need for change, we consider that the existing arrangements continue to provide an effective basis for representation and governance.

Electoral Services will, of course, implement any changes approved by the Commission. However, it is important that the scale of the proposals is carefully balanced against the substantial administrative work, resource commitment and operational risks involved. The changes would require extensive updates to electoral geography, polling districts and polling places, electoral management systems, election documentation and staff training. It is therefore essential that the practical implications for election delivery are fully recognised and that adequate time is allowed to ensure a smooth implementation and maintain the integrity of the electoral process.

In addition, the consultation material published to date has proved challenging to interpret from an electoral administration perspective. Considerable officer time has been required to understand the practical implications of the proposals before any implementation planning could begin. Should the final recommendations be presented in a similar format, there is a significant risk that valuable implementation time will instead be spent interpreting and translating the proposals into operational changes. This would compress already demanding statutory implementation timescales, increasing the risk that critical tasks may be delayed or inadvertently overlooked. To support effective implementation, it would be beneficial for the final recommendations to be accompanied by clear mapping, definitive schedules of affected polling districts and wards, and implementation-ready information that can be readily translated into electoral management systems and election planning processes.

To support the comments set out above, we have outlined below the key operational impacts, associated risks and proposed mitigation measures for the Commission's consideration.

This submission is made on the understanding that it will be published and may be read by a wider audience. It therefore includes a level of operational detail that will be familiar to the Local Government Boundary Commission for England but may be less immediately apparent to non-specialist readers.

Electoral Register and Polling Districts

The proposed ward boundaries will require a comprehensive review of polling districts to ensure they align with the new district ward boundaries. Existing polling districts may no longer be legally compliant where ward boundaries divide current polling districts.

This will require:

- A full Polling District and Polling Place Review.
- Redesign of polling district boundaries.
- Reallocation of electors to new wards and polling districts.
- Restructuring of the electoral register.
- Updates to our Electoral Management System (Xpress) and associated GIS mapping.

These activities are highly resource intensive and require careful planning, validation and quality assurance to minimise the risk of electors being assigned to incorrect polling districts or wards. The proposed implementation timetable means that much of this work would need to be undertaken alongside preparations for the scheduled local government elections, which are the most complex and resource-intensive elections administered by Electoral Services. During this period, core officer capacity is already heavily committed to statutory election planning and delivery activities, limiting the resources available to implement significant structural changes.

Furthermore, undertaking this work so close to a live election would significantly reduce the time available to configure, test and validate the Electoral Management System, electoral register, polling district arrangements and associated election processes before they are relied upon for statutory elections. Given the complexity of local government elections and the fixed statutory deadlines within which Electoral Services must operate, any reduction in implementation and testing time increases the risk of errors or omissions that may not be identified until the election process is underway.

Polling Places and Polling Stations

The proposed changes to ward geography mean that some existing polling stations would no longer be located within the wards they serve. Whilst there is no statutory requirement for polling stations to be situated within the relevant ward, this is considered good practice where reasonably practicable, and the proposals would require Electoral Services to identify and secure suitable replacement venues.

The proposals directly affect the following locations:

- **Nailsea Golden Valley** – The current polling station would become part of the proposed Nailsea Youngwood Ward. This is a double polling station serving approximately 3,500 electors, and a suitable replacement venue would need to be identified.
- **Weston-super-Mare Winterstoke** – The current venue serving Polling Districts Winterstoke (No.1) and Winterstoke (No.2) would become part of the proposed Weston-super-Mare South Ward. This venue accommodates two polling stations serving approximately 2,000 electors, requiring an alternative venue to be identified.

Suitable polling venues are increasingly difficult to secure. Any replacement must be accessible, appropriately located and available for polling day, making this a significant piece of work within an already demanding implementation timetable.

Additionally, the creation of four parish wards (The Elms, Portbury West, Banwell West and Kewstoke East) will require four new polling stations to be identified, assessed for accessibility, secured and staffed. As set out previously, this process is highly resource intensive and is further constrained by a significant shortage of suitable venues.

There are also financial and staffing implications associated with the proposals, as all polling stations must be hired and appropriately staffed for election purposes. Staffing capacity is already identified as a key risk for forthcoming local government elections, and the requirement to recruit additional experienced Presiding Officers presents a further challenge.

In particular, consideration should be given to the electorate size of Portbury West, where the cost and resource implications of establishing a separate polling station are difficult to justify in operational terms. By way of illustration, an estimate of the costs associated with providing an additional polling station for the 86 electors in Portbury West is set out below:

Presiding Officer fee	£272
Presiding Officer training	£40
Presiding Officer travel	£10
Poll Clerk fee	£224
Poll Clerk training	£40
Polling station inspector fee (total fee split with visits to other stations)	£54
Polling station inspector training (total fee split with visits to other stations)	£10
Ballot box equipment (printing, notices, stationary etc)	£80
Polling station equipment (booths, privacy screens, devices for visually impaired voters)	£100
Polling station venue (average cost)	£500
TOTAL	£1,330

Venue availability, accessibility requirements and staffing capacity should therefore be key considerations when determining final ward boundaries, alongside the need to ensure that arrangements remain efficient, proportionate and deliverable in practice.

Election delivery

The proposed changes will require substantial amendments to election administration processes and documentation.

These include:

- Updating ballot paper templates and election data.
- Revising nomination packs and candidate guidance.
- Updating count spreadsheets and election management documentation.
- Testing all election software prior to implementation.
- Training Electoral Services staff and temporary election staff on the revised arrangements.

Ordinarily, preparations for the next scheduled elections would already be underway, including the production of bespoke nomination packs for each district and parish ward, alongside a range of other preparatory electoral planning activities. However, a significant proportion of this work has been placed on hold pending the outcome of the review, as the final ward and parish arrangements will determine the structure and content of key electoral documentation and processes. Whilst we recognise that this is a statutory review with a defined timetable, it should be acknowledged that, once the review concludes, there will be a substantial volume of outstanding work to complete alongside the implementation of any resulting changes, all within a compressed timeframe.

Elector awareness.

We have concerns regarding the accessibility of the consultation documents, particularly as it means that electors may first become aware of these changes when poll cards are delivered to their doorsteps. By that stage, we will already be well into the election timetable, when resources are stretched and we will need to manage any resulting queries and complaints alongside existing pressures.

It is our understanding that the response rate to this consultation has been extremely low, which we believe may be due to limited engagement and the complexity of the supporting documentation. While this may be standard practice for the Commission, the consequence is that many electors are likely to be unaware of the proposed changes, with Electoral Services subsequently required to address the resulting confusion.

We strongly anticipate a significant level of elector confusion at next year's local government elections, particularly in relation to polling stations and candidate recognition.

This will be compounded by existing challenges already affecting the electoral timetable, most notably the changes to the absent voting renewal process. These are expected to generate a high volume of postal vote applications and related enquiries close to the deadline, which will already place additional pressure on resources and increase workload across the team.

Of all the changes being proposed, a particular area of concern is The Elms. There is likely to be substantial confusion as the Community Governance Review concluded that The Elms should remain part of Wraxall and Failand, while the Commission is now recommending its transfer to the Nailsea Golden Valley district ward. Whilst we, as administrators, understand that a change in district ward does not necessarily result in a change to parish arrangements, this distinction is unlikely to be clear to residents and may therefore contribute to further misunderstanding. In addition, previous feedback has been unequivocal in expressing a strong preference for remaining within Wraxall and Failand, with clear opposition to any association with Nailsea.

We therefore anticipate a high volume of complaints, as the community was strongly opposed to this change during the CGR process. During the first stage of consultation, 375 submissions objected to the proposal to move The Elms to Nailsea, and in the second consultation, 466 of 524 submissions supported retaining it within Wraxall and Failand.

We would therefore encourage the Commission to take this feedback into account when making its final recommendation regarding The Elms.

Key Risks

The principal operational risks arising from the proposals are:

- Incorrect allocation of electors to new wards or polling districts.
- Polling districts not reflecting the final legal ward boundaries.
- Existing polling stations becoming unsuitable or unavailable.
- Insufficient recruitment of staff for any additional polling stations.
- Elector confusion.
- Errors in election paperwork (including ballot papers, poll cards, and nomination packs), such as incorrect ward names or contest structures.
- Increased pressure on statutory election timetables due to the volume of implementation work.
- Inadequate training resulting in inconsistent application of the new arrangements.
- Concerns that unclear or insufficiently detailed information from the LGBCE will make implementation more challenging, particularly given existing resource constraints.

Overall Comments

Electoral Services is committed to implementing any changes arising from the Commission's review. However, the scale of work associated with revised ward boundaries and an increase in council size should not be underestimated. Successful delivery of these changes will depend on sufficient implementation time, clearly defined final boundaries, appropriate resourcing, and effective project management.

We would therefore ask the Commission to consider whether, given the level of risk and the extent of work required so close to one of our most complex electoral cycles, the proposed changes are proportionate and justified in their current form, particularly as they originate from a single submission during the first round of consultation.

We would also encourage the Commission to ensure that implementation timescales and resourcing provide Electoral Registration Officers and Returning Officers with adequate opportunity to complete the necessary statutory, administrative, and operational preparations ahead of the first election under the new arrangements.

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Comment text:

Related subject: Electoral Services

Submission attached

Attached Documents:

- second-stage-consultation-submission---electoral-services-(7.pdf