

Tourism, Equalities, Communities & Culture Committee

Date: **10 March 2022**

Time: **4.00pm**

Venue **Hove Town Hall - Council Chamber**

Members: **Councillors:** Osborne (Joint Chair), Powell (Joint Chair), Rainey (Deputy Chair), Evans (Opposition Spokesperson), Grimshaw (Opposition Spokesperson), Simson (Group Spokesperson), Brown, Childs, Ebel and Littman

Invitees: Harpeet Kaur (B&H - CCG), Joanna Martindale (Community Voluntary Sector), Justin Burtenshaw (Sussex Police) and Stephanie Prior

Contact: **Thomas Bald**
Democratic Services Officer
01273 291354
thomas.bald@brighton-hove.gov.uk

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AGENDA

PROCEDURAL MATTERS

70 PROCEDURAL BUSINESS

- (a) **Declarations of Substitutes:** Where councillors are unable to attend a meeting, a substitute Member from the same political group may attend, speak and vote in their place for that meeting.
- (b) **Declarations of Interest:**
 - (a) Disclosable pecuniary interests;
 - (b) Any other interests required to be registered under the local code;
 - (c) Any other general interest as a result of which a decision on the matter might reasonably be regarded as affecting you or a partner more than a majority of other people or businesses in the ward/s affected by the decision.

In each case, you need to declare

- (i) the item on the agenda the interest relates to;
- (ii) the nature of the interest; and
- (iii) whether it is a disclosable pecuniary interest or some other interest.

If unsure, Members should seek advice from the committee lawyer or administrator preferably before the meeting.

- (c) **Exclusion of Press and Public:** To consider whether, in view of the nature of the business to be transacted or the nature of the proceedings, the press and public should be excluded from the meeting when any of the following items are under consideration.

Note: Any item appearing in Part Two of the agenda states in its heading the category under which the information disclosed in the report is exempt from disclosure and therefore not available to the press and public. A list and description of the exempt categories is available for public inspection at Brighton and Hove Town Halls and on-line in the Constitution at part 7.1.

71 MINUTES

To consider the minutes of the meeting held on 13 January 2022.

Contact Officer: Thomas Bald

Tel: 01273 295709

72 CHAIRS COMMUNICATIONS

73 CALL OVER

- (a) Items 77 – 86 will be read out at the meeting and Members invited to reserve the items for consideration.
- (b) Those items not reserved will be taken as having been received and the reports' recommendations agreed.

74 PUBLIC INVOLVEMENT

To consider the following matters raised by members of the public:

- (a) **Petitions:** To receive any petitions presented by members of the public notified by the due date of 24 February 2022;
- (b) **Written Questions:** To receive any questions submitted by the due date of 12 noon on the 4 March 2022.
- (c) **Deputations:** To receive any deputations submitted by the due date of 12 noon on the 4 March 2022.

75 ITEMS REFERRED FROM COUNCIL

9 - 10

Petition referred from the last meeting of Full Council held on 3 February 2022 (copy attached).

- i. **Rhian Evans** - Protect Dyke Road Park and surrounds from the installation of telecommunications masts (including 5G)

76 MEMBER INVOLVEMENT

11 - 16

To consider the following matters raised by Members:

- (d) **Petitions:** To receive any petitions;
- (e) **Written Questions:** To consider any written questions;
- (f) **Letters:** To consider any letters;
- (g) **Notices of Motion:** to consider any Notices of Motion submitted directly to the Committee;
 - i. Notice of Motion on banning the sale of new homes as second homes – Councillors Williams and Childs.
 - ii. Notice of Motion on Addressing the Climate and Biodiversity Emergency Through our Planning Process – Councillors Osborne and Ebel.

77	ANTI-RACISM PLEDGE UPDATE	17 - 26
	Report of the Executive Director Housing, Neighbourhoods, & Communities (Copy Attached).	
	<i>Contact Officer: Emma McDermott</i>	<i>Tel: 01273 296805</i>
	<i>Ward Affected: All Wards</i>	
78	COMMUNITY SAFETY STRATEGY 2020-23 UPDATE	27 - 90
	Report of the Executive Director Housing, Neighbourhoods, & Communities (Copy Attached).	
	<i>Contact Officer: Jo Player</i>	<i>Tel: 01273 292488</i>
	<i>Ward Affected: All Wards</i>	
79	SPENDING OPTIONS DOMESTIC ABUSE ACT FUNDS	91 - 100
	Report of the Executive Director Housing, Neighbourhoods, & Communities (Copy Attached).	
	<i>Contact Officer: Lindsay Adams</i>	<i>Tel: 01273 291032</i>
	<i>Ward Affected: All Wards</i>	
80	RPMT ANNUAL PLAN AND REVIEW - 2022/23	101 - 168
	Report of the Executive Director Economy, Environment, and Culture (Copy Attached).	
	<i>Contact Officer: Mark Croston</i>	
81	BRIGHTON DOME & BRIGHTON FESTIVAL ANNUAL REVIEW	169 - 174
	Report of the Executive Director Economy, Environment, and Culture (Copy Attached).	
	<i>Contact Officer: Mark Croston</i>	
	<i>Ward Affected: All Wards</i>	
82	PUBLIC ART - PLANNING ADVICE NOTE AND DEVELOPER CONTRIBUTIONS CALCULATOR	175 - 220
	Report of the Executive Director Economy, Environment, and Culture (Copy Attached).	
	<i>Contact Officer: Clare Flowers</i>	<i>Tel: 01273 290443</i>
	<i>Ward Affected: All Wards</i>	
83	CITY PLAN PART 2 - CONSULTATION ON MODIFICATIONS ARISING FROM EXAMINATION HEARINGS	221 - 340
	Report of the Executive Director Economy, Environment, and Culture (Copy Attached).	
	<i>Contact Officer: Helen Gregory</i>	<i>Tel: 01273 292293</i>
	<i>Ward Affected: All Wards</i>	

- 84 LISTED BUILDING HERITAGE PARTNERSHIP AGREEMENT FOR THE UNIVERSITY OF SUSSEX 341 - 344**
- Report of the Executive Director Economy, Environment, and Culture (Copy Attached).
- Contact Officer: Tim Jefferies Tel: 01273 293152
Ward Affected: Hollingdean & Stanmer
- 85 LOCAL DEVELOPMENT SCHEME UPDATE 345 - 360**
- Report of the Executive Director Economy, Environment, and Culture (Copy Attached).
- Contact Officer: Steve Tremlett Tel: 01273 292108
Ward Affected: All Wards
- 86 THE QUEEN'S PLATINUM JUBILEE CELEBRATIONS: UPDATE 361 - 370**
- Report of the Executive Director Economy, Environment, and Culture (Copy Attached).
- Contact Officer: Giles Rossington Tel: 01273 295514
Ward Affected: All Wards
- 87 ITEMS REFERRED FOR FULL COUNCIL**
- To consider items to be submitted to the 7 April 2022 Council meeting for information.
- In accordance with Procedure Rule 24.3a, the Committee may determine that any item is to be included in its report to Council. In addition, any Group may specify one further item to be included by notifying the Chief Executive no later than 10am on the eighth working day before the Council meeting at which the report is to be made, or if the Committee meeting take place after this deadline, immediately at the conclusion of the Committee meeting*

Date of Publication - Wednesday, 2 March 2022

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FURTHER INFORMATION

For further details and general enquiries about this meeting contact Thomas Bald, (01273 291354, email thomas.bald@brighton-hove.gov.uk) or email democratic.services@brighton-hove.gov.uk

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Brighton & Hove City Council

Tourism, Equalities, Communities, and Culture Committee

Agenda Item 74 (a)

Subject: Petitions

Date of meeting: 10 March 2022

Report of: Executive Director for Governance, People & Resources

Contact Officer: Name: Thomas Bald
Email: thomas.bald@brighton-hove.gov.uk

Ward(s) affected: All

1. Purpose of the report and policy context

- 1.1 To receive any petitions submitted directly to Democratic Services or any e-Petition submitted via the council's website.

2. Recommendations

- 2.1 That the committee responds to the petition either by noting it or where it is considered more appropriate, calls for an officer report on the matter.

3. Context and background information

- 3.1 To receive the following petition signed by 724 people at the time of publication:

(1) Protect Dyke Road Park and Surrounds from the installation of telecommunications masts (including 5G)

We the undersigned petition Brighton & Hove Council to designate this site protected from Prior Approval for the installation and erection of telecommunications equipment under Article 4 Direction covering GPDO. The site to be covered to comprise of the triangular portion of land of Dyke Road and the Upper Drive to The Old Shoreham Road re-joining Dyke Road. This would include Dyke Road Park, Park Lodge, Cardinal Newman School, BHASVIC Sixth Form College and any other building or space in this area. In addition to be extended to the adjoining portion of land on the Upper Drive to include the Martlets, Cottesmore School and Brighton and Hove Girls School.

Under LLHA0054 Dyke Road Park is recognised on the Brighton and Hove List of Heritage Assets. It is rich in flora and fauna some of which has protected status. This includes vintage elm trees, badgers and bats. It is used by the wider population and students attending the five schools in the vicinity. It is part of the urban 'green lung' connecting coast to downland as part of the UNESCO sponsored Living Coast. The proposed area has concentrated use by young people for substantial amounts of time for education and leisure purposes. A precautionary approach to the introduction of 5G technology in the identified area is prudent and called for.

Brighton & Hove City Council

Tourism, Equalities, Communities & Culture Committee

Agenda Item 75(d)

Subject: Stop people being priced out of our city. Ban the sale of new homes as second homes.
Notice of Motion referred from Council on the 3 February 2022

Date of meeting: 24 March 2022

Ward(s) affected: All

For general release

1. SUMMARY AND POLICY CONTEXT:

- 1.1 To receive the following Notice of Motion which was debated at and referred from the full Council meeting held on the 3 February 2022.

2. RECOMMENDATIONS:

- 2.1 That the Committee responds to the motion concerning the sale of new homes as second homes either by noting it or where it is considered more appropriate, calling for an officer report on the matter as requested, which may give consideration to a range of options.

3. CONTEXT / BACKGROUND INFORMATION

- 3.1 The following resolution from the full council meeting held on the 3 February 2022 for the committee to consider is detailed below:

In order to stem the rise of second home ownership which is having a severely detrimental effect on housing supply and affordability, this Council:

1. Supports the implementation of a principal residency policy whereby new open-market housing planning permission will only be granted where there is a condition restricting occupancy as a Principal Residence – the purpose being to reduce the levels of second homes and enable increased primary residence and year-round community benefits;
2. Requests the Housing and Tourism, Equalities, Communities & Culture committees to call for a report to be submitted to meetings of each of the committees within the next six months to outline all possible policy steps that could be considered in order to implement this policy and model the impact of such an approach on both affordability and availability in the next five years;
3. Requests that this report will highlight:
 - The planning policy changes required;

- Examples of Planning Authorities where such outcomes have been successfully achieved;
- Any evidence gaps or reports required to meet standards of evidence;
- A timetable for implementation for this Authority and potential mitigations required – such as a balancing policy for the development of holiday lettings.

Supporting Information:

Principal residences are defined as those occupied as the residents' sole or main residence, where the resident spends the majority of their time when not working away from home or living abroad.

<https://www.ft.com/content/2128f460-67b0-445b-a684-bf87560a081d>
<https://www.theargus.co.uk/news/19378734.families-priced-brighton-hove>
<https://www.theargus.co.uk/news/19042360.rising-rent-costs-outpacing-wages-brighton-hove/>
<https://commonslibrary.parliament.uk/research-briefings/cdp-2022-0001/>
<https://www.theargus.co.uk/news/19211154.one-every-37-homes-brighton-hove-empty-figures-show/>
<https://www.airdna.co/vacation-rental-data/app/gb/south-east/brighton-and-hove/overview>

BRIGHTON & HOVE CITY COUNCIL

COUNCIL

6.30pm 3 FEBRUARY 2022

HOVE TOWN HALL - COUNCIL CHAMBER

MINUTES

Present: Councillors Robins (Chair), Mears (Deputy Chair), Allcock, Appich, Atkinson, Bagaeen, Barnett, Brown, Childs, Clare, Davis, Deane, Druitt, Evans, Fishleigh, Gibson, Grimshaw, Henry, Hills, Hugh-Jones, Lloyd, Meadows, Mac Cafferty, McNair, Miller, Nemeth, Peltzer Dunn, Powell, Shanks, Simson, C Theobald, West, Wilkinson and Williams

PART ONE

77 STOP PEOPLE BEING PRICED OUT OF OUR CITY. BAN THE SALE OF NEW HOMES AS SECOND HOMES.

77.1 The Notice of Motion as listed in the agenda was proposed by Councillor Williams on behalf of the Labour Group and formally seconded by Councillor Childs.

77.2 Councillor Gibson spoke in favour of the motion and Councillor Mears questioned how the sales could be recoded properly and state that she could not support the motion.

77.3 Councillor Williams noted the comments and sought the council's support for the motion.

77.4 The mayor then put the following motion to the vote:

In order to stem the rise of second home ownership which is having a severely detrimental effect on housing supply and affordability, this Council:

1. Supports the implementation of a principal residency policy whereby new open-market housing planning permission will only be granted where there is a condition restricting occupancy as a Principal Residence – the purpose being to reduce the levels of second homes and enable increased primary residence and year-round community benefits;
2. Requests the Housing and Tourism, Equalities, Communities & Culture committees to call for a report to be submitted to meetings of each of the committees within the next six months to outline all possible policy

steps that could be considered in order to implement this policy and model the impact of such an approach on both affordability and availability in the next five years;

3. Requests that this report will highlight:

- The planning policy changes required;
- Examples of Planning Authorities where such outcomes have been successfully achieved;
- Any evidence gaps or reports required to meet standards of evidence;
- A timetable for implementation for this Authority and potential mitigations required – such as a balancing policy for the development of holiday lettings.

77.5 The mayor confirmed that the motion had been carried by 23 votes to 11 against.

Brighton & Hove City Council

TECC Committee

Agenda Item

Subject: Addressing the climate and biodiversity emergency through our planning process

Date of meeting: 11 March 2022

Proposer: Councillor Osborne
Seconded: Councillor Ebel

Ward(s) affected: All

That this Council resolves:

1. That officers introduce a Climate Change and Biodiversity Crisis Checklist for all new build planning applications that will
 - a. Bring together, replace (where relevant) and update all of the information currently required with new applications into to a single checklist setting out how the application responds to policies, guidance and the climate change and biodiversity crisis;
 - b. Assess best practice from other local planning authorities and add to the checklist
 - c. That these checklists will be monitored, and the outcomes published annually in the Authority Monitoring Report
 - d. That officers propose measures to check implementation.
2. Officers agree the proposals with the Executive Director of EEC and the co-chairs of TECC Committee and a timetable for implementation

Supporting Information:

We already have strong policies in the city plan and in the draft Biodiversity and Nature Conservation SPD, but we need to bring this together during the application process to ensure that developers have clear processes set out to guide them and an appropriate way of demonstrating this in their applications.

Subject: Anti-Racism Pledge Update

Date of meeting: 10 March 2022

Report of: Executive Director Housing, Neighbourhoods and
Communities

Contact Officer: Name: Emma Mcdermott
Tel: 01273 291577
Email: emma.mcdermott@brighton-hove.gov.uk

Ward(s) affected: All

For general release

1. Purpose of the report and policy context

- 1.1 The initial report on actions being taken by the council towards becoming an anti-racist council was presented at TECC committee on 29th July 2020 and an update was presented on 19th November 2020. At this meeting officers were instructed to provide brief updates as a standing item at every TECC committee meeting.

2. Recommendations

- 2.1 That Committee notes the report.
- 2.2 That Committee delegates authority to the Executive Director for Housing, Neighbourhoods and Communities to award the £110,000 – previously allocated to the World Reimagined Project - in accordance with the broad principles set out at paragraph 3.7.5. and with oversight from the cross-party Members Advisory Group for the council's Voluntary Community Sector grant programme.
- 2.3 That Committee approves the use of funds allocated to the cultural programme of the World Reimagined Project to establish a budget of £50,000 for uses outlined in paragraph 3.7.5 which will be part of the ABCD Plan for Cultural Recovery.

3. Context and background information

- 3.1 This report should be read in context of the previous reports starting with the report to a special TECC committee meeting in June 2020 through to the last report in November 2021.

3.2 Updates are noted where specific activities or progress has been made.

3.3 Engagement

- 3.3.1 The eighth meeting of the anti-racism Community Advisory Group is scheduled for 16th March. The meeting is with council officers from the Families, Children and Learning directorate to discuss the council's anti-racism project on children social work, fostering and adoption. It will also receive an update on the council's anti-racism strategy in schools work.
- 3.3.2 The council's community engagement officer focused on working with the BME residents and groups, continues to reach out and build trust and confidence with groups and residents in the city. Alongside direct outreach to residents and groups the officer is producing a 6-weekly bulletin to BME groups in the city to facilitate networking and information sharing between groups and provide information about the council of relevance to the groups. The officer is working with groups to enable community-led and community specific discussions about their experience of racism and racial inequality. Funding has been made available to enable these community-led discussions. First two projects receiving funding are with BARCO and Bridging the Change.
- 3.3.3 The community engagement officer has also established a monthly meeting with other community engagement colleagues to facilitate internal discussions about anti-racism. Colleagues have discussed topics such as micro-aggressions, white privilege and institutional racism, with particular focus on how these concepts manifest at a local level in order to inform future engagement. The meeting has also provided a platform for members of the community to share their work and expertise with the team. Guest speakers have included a representative from BARCO, with representatives from Brighton & Hove Jewish Community booked for March and further slots available for others in the next financial year.

3.4 Education and young people

- 3.4.1 With the commencement of the anti-racist education advisor, two governance bodies were established to support the strategy: A community advisory group to provide direction and scrutiny made up of community representatives, parents and carers and young people with lived experience of racism. An implementation group also formed comprised of education leaders and educators, tasked with providing direction and enabling implementation of the strategy. The strategy racial literacy training continued to be rolled out with some settings opting for setting-specific training. A group of primary educators has been working on a racial literacy curriculum framework for KS1 and KS2 and sharing good practice across settings. A group of educators were supported to develop PHSE resources for World Afro Day and anti-bullying week. A pupils of colour mentoring project was piloted in a secondary school alongside a pilot project to improve responses to racist incidents.

An updated version of the strategy and accompanying roadmap will be shared with the Children and Young People's Skills Committee in March 2022.

Work continues with families that experience racism through the anti-racist project in the Children's Safeguarding & Care service. It is chaired by one of our Black social workers. The project has developed an action plan with staff and this includes workstreams on the voice of children and families and practice with families. There is also a programme of bespoke learning events and regular anti-racist practice discussions to support staff. This work is well supported by our Practitioner for Anti-Racist Practice.

3.5 Council workforce

3.5.1 The 6-month Diverse Talent development programme launched in January 2022. The initial programme is being offered to 16 BME staff, to support their career progression, as council workforce data shows that BME staff are not proportionately represented in roles graded SO1/2 and above. The learning outcomes include:

- Prepare and develop for staff for their next role within the council
- Develop their knowledge, experience, skills and confidence to be part of an inclusive culture and influence for change in the organisation if you choose to do so
- Deepen their self-awareness and leverage their strengths
- Learn about key management and leadership theories
- Develop their communication, presentation and interpersonal skills
- Understand organisational context, to help you shape and influence your own career progression

The first session has been delivered and well received. Sponsors from Leadership Network have been identified and matching will take place at the second session in February.

A new eLearning module for staff on Allyship was launched in February.

The programme of Anti Racist training for this financial year has concluded, with a programme for 22/23 being commissioned.

HR Diversity Recruitment Consultant actions include:

- Collaborating with the council's Adult Education Hub and other community partners to support employability skills training, for example, Next Steps for ESOL learners
- Attendance at virtual Universities careers fairs (Nov 2021 and Feb 2022)
- Delivering fortnightly inclusive recruitment surgeries to offer timely advice to recruiting managers, such as inclusive advert writing, promotion of roles on social media and developing inclusive shortlisting questions

3.7 Our Legacy

- 3.7.1 The council has allocated funding of £10,000 to the first phase of the 'Our Legacy' project which entails tendering for a series of expert facilitated session that engage with all city stakeholders on enslavement and colonisation, responses from Brighton & Hove to the slave trade and colonialism, and future memorial and celebration of our city. The purpose of the commission is to independently scope, plan, deliver and evaluate a programme of strategic forums and community engagement activities for the development of the 'Our Legacy' project. This initiative aims to examine local heritage and history to discover more about shared colonial legacy- exploring the extent to which the prosperity which helped build the city was dependent upon colonial exploitation. Our legacy as a city sits within a contested arena, with deeply held views concerning our common colonial history and links with enslavement and its impact on our past and present from a range of perspectives, and with some critical areas lacking an informed consensus. Therefore, a sensitive, thoughtfully planned and inclusive approach to the debate and any significant future action is required.
- 3.7.3 Small scale projects have been taking place. Firstly, following a detailed engagement exercise with local residents, primary school and community groups the council has officially renamed its new temporary accommodation on Hartington Road Manoj House. Local people had the opportunity to submit their suggestions to a local panel of residents, school representatives and ward councilors who generated a short-list and made the final recommendation to the council for sign-off. Plans are underway for a celebration and unveiling of the new name in due course.
- 3.7.4 The name 'Manoj House' is in commemoration and respect for Manoj Natha-Hansen who was a teacher at St Martin's Primary School. Sadly, he died suddenly in September 2020. He was a teacher for eighteen years and specialised in Special Educational Needs. Manoj won awards from the National Education Union for his campaigning work for minority groups working in education. Family members have been involved and are supportive of the decision.
- 3.7.3 Discussion is taking place with representatives of the Coombe Rd Local Action team around the "South Africa Streets" a collection of streets off Lewes Road named for places, events and people connected to the second Boer War. Working with residents we are considering the potential for arts/public realm interventions to explore the meaning and impact of this remembrance for our city.
- 3.7.4 In January 2022 the organisers of the World Reimagined (TWR) announced that they won't be progressing their art education project as originally planned for the city. A trail of large-scale globe sculptures to challenge understanding of the transatlantic slave trade and its impact had been due to come to the city between August – October 2022. There will still be

opportunities for local artists and schools to be involved with other elements of the scheme.

- 3.7.5 The £160,000 committed to the city's participation has been retained and ringfenced to support the ambition of the Council's anti-racism work to see an ever-stronger Black, Asian and ethnic minority led community and voluntary group sector as well as supporting cultural recovery work that aligns with this. Further discussions and co-production with communities is necessary before firm decisions are made on use of this funding. Member oversight of the £110,000 funding to support the BME VCS will be via the well-established cross-party Members Advisory Group which oversees the council's VCS grant programme. An update on the funding will be provided to TECC committee as part of the standing item on Anti-Racism Pledge update. Existing grant making protocols and processes will followed to award the funding.
- 3.7.6 The allocation of £50,000 from TWR budget will support the ABCD Plan for Cultural Recovery to further develop an inclusive cultural offer. The recovery plan supports a clear set of values and principles that make the city a better place to work for Cultural Workers and to tries to ensure that no one is left out or left behind. Key areas for support have been identified. These are: anti-racism, intersectionality, inclusivity, collaboration, empathy, dignity, respect, bravery, boldness, paying people on time and openness.
- 3.7.7 The ABCD Governance Board will develop a call for a number of small projects in 2022/23 which address the issues in paragraph 3.7.5 above, enabling the city's creative sector to respond through arts projects to further the council's aims expressed in our pledge to become anti-racist and which will cultivate inclusive cultural leadership and programming.

3.8 BME community and voluntary sector

From the council's annual VCS grant's programme - the Communities Fund 2021/22 - 23 grants were awarded to 21 BME groups/organisations to the value of £77,080. This out of a total budget of £384,146 and 76 awards made to date.

This is broken down into Communities Fund rounds 1-3 grants of £65,700 and BME Engagement Fund at £11,380.

3.9 Emergency food

The council has allocated funding of £15,000 for an exploratory piece of research on the emergency food access needs of Black, Asian and Minority Ethnic communities and Refugees & Asylum Seekers. The aim is for the city to have a better understanding of the different communities access needs and of best practice by providers in meeting needs, and to make recommendations on strengthening organisations providing support. The commission aims to reduce inequality and address immediate

concerns about malnutrition, health and wellbeing. The project is scheduled to start April 2022 and report in early Autumn 2022.

3.10 Community Safety

The Local Authority is currently working with three local services and the Police to develop Hate Crime Third Party Reporting Centres, with a proposed opening date of 1 April 2022. These centres will run for a year as a pilot. It is acknowledged as good practice to have such reporting mechanisms in place, so as to allow people to report Hate Crime to non-statutory bodies and to receive support. The reports made to these centres will be shared with Police and/or the council's Safer Communities Team with the reporters consent. These reporting centres are being funded through COMF funding of £60,000.

The reporting centres will be based at:

- Possibility People, Montague House
- Racial Harassment Forum, BMECP, Fleet Street
- Rainbow Hub, Ledward Centre

The model that will be used is based on research undertaken by the Safer Communities Team into areas where third party reporting has been successfully implemented, and consultation with local community groups and organisations.

A working group is currently finalising the reporting and monitoring systems, a local directory of relevant support services, producing publicity that will advertise the reporting centres, and devising training for staff who will be working in the reporting centres and receiving Hate Crime reports. This working group will meet quarterly to review and evaluate the success of the project with the objective of securing further funding to make the centres sustainable.

3.11 Civic Leadership

Partial funding has been identified to support a civic leadership programme delivered by Operation Black Vote. Officers have confirmed that the provider is still in a position to run the programme.

Subject to identification of sufficient funding the programme is expected to commence late Spring 2022

4. Analysis and consideration of alternative options

- 4.1 The progress outlined above is on actions undertaken in response to the council's pledge to become an anti-racist council, anti-racism Notices of

Motion and petitions accepted by full council/committees and previously Member agreed work under the Fair & Inclusive Action Plan.

5. Community engagement and consultation

- 5.1 Engagement as outlined above in section 3.

6. Conclusion

- 6.1 TECC committee requested a standing item on every agenda updating on progress towards the council's anti-racism commitments.
- 6.2 This report updates on progress and the contents are for Members to note.

7. Financial implications

- 7.1 Project management and leadership of the work is being carried out as part of core business of the Communities, Equality and Third Sector (CETS) team. A budget of £10,000 has been allocated from the CETS initiatives budget to support the work. Financial implications arising from the other actions identified in the report will be considered by the relevant service as part of their standard budget management processes and decisions on allocation of funding will be made in line with council's budget setting process.

The £0.160m funding referred to in paragraph 3.7.4 of the report was allocated and ring-fenced as part of the 2020/21 TBM outturn report to P&R Committee in July 2021.

Name of finance officer consulted: Mike Bentley Date consulted
15/02/22.

8. Legal implications

- 8.1 There are no legal implications arising from this report. All the actions proposed are in line with the Council's powers and duties, in particular under the Equality Act 2010.

Name of lawyer consulted: Alice Rowland Date consulted: 10/02/22

9. Equalities implications

- 9.1 The intention of this work is to address identified racial inequalities and racism experienced by people who live in, work in and visit the city. The range of engagement planned with people who share other characteristics in addition to their ethnicity will ensure that perspectives are heard from a wide range of people. This will enable the development of tailored and bespoke actions to address all forms of racism, where it is based on ethnicity, skin color or any other attribute.

- 9.2 The work is central to the council's legal duties under the Equality Act 2010 to eliminate discrimination, advance equality of opportunity and foster good relations between communities, as well as to encourage civic engagement by under-represented groups. It also complements and supports the council's Fair & Inclusive Action Plan in addressing the findings of the review of race equality by Global HPO.

10. Sustainability implications

- 10.1 No sustainability implication arise from this report.

11. Other Implications

Social Value and procurement implications

- 11.1 No direct social value and procurement implications arise from this report.

Crime & disorder implications:

- 11.2 Crime and disorder implications are covered in section 3.10 above.

Public Health implications:

- 11.3 No direct public health implications arising from the report.

Subject:	Community Safety and Crime in Brighton & Hove		
Date of Meeting:	10th March 2022		
Report of:	Executive Director of Housing Neighbourhoods and Communities		
Contact Officer:	Name:	Jo Player	Tel: 292488
	Email:	jo.player@brighton-hove.gov.uk	
Ward(s) affected:	All		

FOR GENERAL RELEASE

1. PURPOSE OF REPORT AND POLICY CONTEXT

- 1.1 Under the Crime and Disorder Act 1998, there is a requirement for statutory and other partners to formulate a plan every three years to tackle crime and disorder and monitor progress. A new Community Safety Strategy was agreed by full council in July 2020. This report provides an update on the work undertaken by the Community Safety Partnership in relation to the Community Safety and Crime Reduction Strategy.
- 1.2 At the Tourism, Equalities, Communities and Culture (TECC) committee in January 2022, a Notice of Motion was passed requesting a review of policies and procedures relating to crime in the City in conjunction with Sussex Police and the Sussex Police and Crime Commissioner. This report provides an update on the review of the partnership Community Safety and Crime Reduction Strategy 20-23. For information the NOM is attached at Appendix 1.

2. RECOMMENDATIONS

- 2.1 That committee notes the work being undertaken by the Safer Communities Team and partners in relation to the Community Safety and Crime Reduction Strategy 2020-23.

3. CONTEXT/ BACKGROUND INFORMATION

Overview of police recorded crimes and incidents

- 3.1 There were 24,604 crimes recorded by the police in Brighton & Hove in 2020/21. This compares with 29,393 in 2019/20 which was mostly before the impacts of Covid restrictions were felt. Total crimes between Jan and May 2021 were lower than the same months pre Covid, but from June 2021 onwards, total crimes have, broadly speaking, fluctuated around pre-Covid levels. Generally acquisitive crimes remained much lower during 2021 than pre-Covid. Criminal

damage offences in 2021 have generally been at or below pre-Covid levels. Public place violent crimes have been rising over the course of 2021 and since May 2021 have tended to exceed both 2020 (except Aug) and pre-Covid levels. The months from September to November showed the highest numbers. Graphs showing the data is attached at Appendix 2

- 3.2 The number of police recorded serious violence offences in 2021 have fluctuated between 8 and 27 per month, but except for May and November have remained below pre-Covid levels. There has been an upward trend in the number of knife/sharp instrument offences over the course of 2021, peaking at 43 in November but dropping right down again to 13 in December.
- 3.3 There has been an increase, particularly in October (n=16) and November (n=18), in the number of attendances at A&E related to alcohol and/or assault where there is a note of spiking, or possible spiking, added in a text field. Numbers dropped again in December (n=7) and January (n=9), although remained generally higher than in the first half of 2021/22.
- 3.4 Police recorded domestic violence offences have been broadly at pre-Covid level in the first ten months of 2021, dropping slightly below pre-Covid levels for the last two months of the year. The number of police recorded sexual offences since the winter lockdown early in 2021 has been mostly higher than both 2020 and pre-Covid. Numbers in the months of September, October and November were particularly high.
- 3.5 The number of police recorded ASB incidents was 85% higher in 2020/21 than the year before, with numbers especially high when the Covid restrictions were the greatest. This effect was particularly clear in the most numerous 'nuisance ASB' category, but numbers of personal ASB and environmental ASB incidents were also up. This was likely to do with policing activity and public reports in respect of the breaching of restrictions. The numbers have steadily declined over the last nine months, and now sit at around pre-Covid levels.
- 3.6 The number of racist incidents and crimes has climbed since the lockdown months of Jan and Feb 2021, reaching a peak in July, and dropping in subsequent months, but numbers recorded since May have been generally higher than pre-Covid. LGB hate incidents and crimes are fewer but show a similar rising trend over the first nine months of 2021 with monthly numbers over the last four months of the year being above pre-Covid levels.
- 3.7 The Community Safety Partnership's Community Safety and Crime Reduction Strategy 2020-23 is regularly reviewed at the quarterly Community Safety Partnership Board and has recently been reviewed by officers and partners, including the Police and Crime Commissioners Office and Sussex Police and strategic assessments have been undertaken for each priority area. No major changes to the strategy have been identified. However due to the overlap between the actions and work streams sitting under the serious violence and exploitation priority areas, it is proposed to merge these two priority areas and associated action plans. A copy of the refreshed strategy is attached at Appendix 3.

Updates on work on the Strategy priority areas

Serious violence and Exploitation

- 3.8 The Home Office agreed additional one-year funding for 2021-22 to continue the development work of the Violence Reduction Partnership (VRP; previously known as the Violence Reduction Unit) and this has grown over the past six months. The majority of the Home Office funding re-commissioned the Brighton Streets Partnership detached youth work to target violence hotspot areas and respond to emerging issues where appropriate. Indications from the Home Office are that funding will continue for this work for the next three years.
- 3.9 Brighton & Hove VRP provided insight and learning from the recently completed podcasts created by young people, supported by Trust for Developing Communities, to interview police officers and share the experiences of young people, particularly from Black and diverse and/or minoritised communities, of engagement with police
- 3.10 The multi-agency Adolescent Vulnerability Risk Meeting (AVRM) continues to be held weekly to ensure that safety plans in place for children at risk of criminal or sexual exploitation are robust
- 3.11 A drug impact reduction co-ordinator has been appointed for three years. The central aim of the role is to reduce the harm caused by drugs to our communities. Key to this will be working with the council's Community Engagement Team and other partners to increase public confidence in reporting incidents of drug harm, and to identify safeguarding concerns in neighbourhoods enabling resources to be targeted appropriately. Two consultation events are being planned to seek the views of residents and a further summit to be held later in the year.
- 3.12 In December 2021, central government produced a new drugs strategy, '[From Harm to Hope: a 10-year drugs plan to cut crime and save lives](#)'. The strategic priorities focus on breaking drug supply chains, delivering a world-class treatment and recovery system, and achieving a generational shift in demand for drugs. Breaking drug supply and preventing exploitation and/or supporting those who have been exploited, is a key component of the current Exploitation and Serious Violence Action Plan.
- 3.13 Operation Safety has increasingly provided regular knife crime analysis together with violent crime hot spot analysis to the Joint Action Group (JAG) and also reports to the Partnership Tactical Tasking Coordination Group (PTTCG) to oversee emerging community safety issues and task resources accordingly. The JAG is attended by representatives from the BHVRP-funded Brighton Streets Partnership detached youth work service.
- 3.14 The council as the Licensing Authority has created special policies designed to restrict the amount of licensable premises in the city centre and promote good

practices to minimise the adverse impact from alcohol-use. The council's licensing team works closely with Brighton Police Licensing carrying out joint enforcement work of licensed premises and joint age restricted test purchase exercises including the sale of alcohol and knives. Safeguarding and child sexual exploitation training is provided to the hotel and hospitality sector and has been made mandatory for all of our licensed taxi drivers.

- 3.15 There has been considerable activity in the city over the past year to improve our collective response to all forms of modern slavery and human trafficking building on the signing of an [Anti-Slavery Pledge](#). This activity is overseen by the city's Anti-Slavery Network which is made up of representatives from the local authority, police and health together with the community and voluntary sector. The main focus of this past year has been developing the council's [Modern Slavery Statement in line with S.54 Modern Slavery Act 2015](#). This is currently being led by Orbis Procurement on behalf of BHCC, East Sussex County Council and Surrey County Council and intends to demonstrate our commitment to transparency in our supply chains.
- 3.16 BHCC, together with Sussex Police, other local authorities in the county and the community and voluntary sector, are part of the Sussex Anti-Slavery Network (SASN) which seeks to improve how the county tackles all forms of exploitation. As part of the SASN, BHCC is part of a National Network Coordinators Forum made up of representatives from across the country to share good practice and emerging issues. This includes a review of current first responder guidance for local authorities. BHCC is a designated 'first responder' agency as per [statutory guidance relating to S.49 Modern Slavery Act 2015](#).
- 3.17 BHCC introduced the modern slavery referral pathway on 1st April 2020 following a period of development work in the previous financial year. The referral pathway requires all council officers who identify a potential victim of modern slavery and/or human trafficking to refer child potential victims to Front Door for Families as per any other child safeguarding concern. Adult victims are referred to a specific modern slavery inbox managed by the Safer Communities Team who will triage the referral based on whether the main presenting need is related to care and support or homelessness. This means that either Adult Social Care or Housing Options will lead on engaging with the adult potential victim with the view to the National Referral Mechanism being used. This has seen an increase in the number of referrals made into the NRM

Domestic violence and abuse, sexual violence and violence against women & girls

- 3.18 BHCC in conjunction with colleagues in East and West Sussex and the OSPCC were successful in obtaining funding from the Home Office, specifically to target Violence Against women and girls (VAWG). The four partner organisations were also successful in obtaining funding from the Safety of Women at Night (SWAN) funding from central Government. This has allowed for the deployment of taxi marshals on two City centre ranks on Friday and Saturday nights until March 2022, the purchase of an additional quad bike for the beach patrol, improving lighting in and around the Old Steine, War

Memorial and Pavilion Gardens. The funding will also provide work in schools about appropriate relationships, training for venues in the city as well as the development of a safe space app.

- 3.19 A new Pan Sussex Domestic Abuse strategy has been published following agreement by this committee in January and work has started on consultation for the development of a new VAWG strategy later this year.
- 3.20 Work has started to deliver additional support services for those experiencing Domestic abuse following the award of 'new burdens funding from the Department of Levelling Up Housing and Communities. (DLUHC)
- 3.21 A new LGBTQ+ & Trans non binary domestic violence Independent domestic violence advocate support service was launched by Switchboard in January 2022.

Anti-social behaviour

- 3.22 The Partnership Tactical Tasking and Co-ordination Group continues to agree and review community safety priorities and ensures that resources are appropriately deployed.
- 3.23 An updated Supported Accommodation Community Responsibility Protocol is due to be signed up to by local homeless hostels by end March 2022. This will include support and a training offer by the Community Safety Team to enable hostels to implement good practice in addressing ASB in and around their accommodation.
- 3.24 The local Community Safety Partnership has implemented a new community trigger (i.e. ASB case review) procedure, in line with updated Home Office guidance.
- 3.25 In November 2019 the Environment, Transport & Sustainability Committee agreed the Graffiti Reduction Strategy which contains four workstreams of prevention, removal, enforcement and monitoring/measuring. Within the last 12 months officers have:
 - Begun engagement work with the Statutory Undertakers to push for improved removal of graffiti on their property and develop clear lines of reporting for when issues occur.
 - Finalised back-office systems and trained Environmental Enforcement Officers to issue Community Protection Warnings (CPWs) and Community Protection Notices (CPNs) which it is hoped will start to be issued in 2022 and which will enforce property owners to take greater responsibility.
 - In November 2021 commenced a 3 month graffiti removal trial on London Road where all incidents of graffiti from all property (public,

private, commercial and residential) will be removed within 24 hours of occurrence. It is hoped that quicker removal of graffiti will lead to a reduction in future incidents occurring.

- Co-ordinated joint patrols by BHCC Environmental Enforcement Officers and police colleagues.
- Worked with community groups and local artists on murals in public spaces which deter graffiti.

3.26 The new working arrangements between Sussex Police and the Council in relation to Public Space Protection orders (alcohol in public places) have been implemented and are working well.

3.27 An encampments co-ordinator has been employed on a trial basis to co-ordinate the response to tents on unauthorised sites in the City. Whilst a 'welfare first' approach will be taken, the creation of this post has meant that tents are being removed more quickly, reducing the potential impact on local communities regarding associated ASB. The welfare first approach also means that those sleeping in tents because they are homeless will be offered housing assistance as quickly as possible. Operational activity to address such concerns is agreed and overseen by the weekly Encampments meeting and the six-weekly Street Community Partnership Meeting, and some of this work is now undertaken by the new ASB and Exploitation Substance Misuse Outreach Worker based within CGL Substance Misuse Services.

Hate incidents and crimes

3.28 Recent developments have included the launch of the Anti-Racism pledge and package of immediate actions by the council and closer partnership working between council teams. There is also increased partnership work across statutory and third sector partners to develop third party reporting centres and mechanisms and other work to encourage reporting. Two of these should launch in April 2022.

3.29 There is a new community based campaign #BackOffBackUp funded by OSPCC from Brighton based Across Rainbows to raise awareness around the lack of 'LGBTQ safe spaces' and encourage shops, bars and premises to sign up to provide safe space for people feeling unsafe. A community-led campaign, funded by BHCC and Sussex Police to address the under-reporting of hate incidents was launched in Dec 2020. The outcome of this campaign is being monitored during 2021/22. The initial report showed an increased understanding in the community of what constitutes a race and faith-based hate incident and of reporting mechanisms and an increase in hate incidents reported to the Racial Harassment Forum.

3.30 Partnership work between BHCC Cityclean and Sussex Police is underway to promote the reporting of hate-based stickering and graffiti, and further develop information sharing processes.

- 3.31 Partnership work between statutory agencies and third-party service providers to develop third party reporting centres and mechanisms is underway with a plan to launch in April 2022.
- 3.32 The pan-Sussex Hate Crime Working Group is currently reviewing hate crime engagement across Sussex with the objective of a joined up consistent engagement campaign across the county.
- 3.33 There was a range of activity for National Hate Crime Awareness Week in October 2021, with further promotion of the Upstanders films on social media and a BHCC news story featuring messaging on the reasons for reporting hate incident, which local work has identified as a priority for communicating to local groups.

Challenge Extremism

- 3.34 BHCC continued to facilitate the Upstanders Network, bringing diverse communities and statutory partners together to stand against hate and undertake collaborative work to tackle hate crime. Following a successful bid to the Home Office for support, the Upstanders twitter account was launched, and several short Upstanders films were created and promoted. Upstanders messaging was also promoted on Brighton & Hove buses.

Prevent

- 3.35 The Counter Terrorism Local Profile (CTLP) and the threat and risk pictures for the City were discussed at recent Prevent Board meetings and the refreshed Prevent Action plan responsive to all current and emerging risks in the city was agreed.
- 3.36 Channel Panel has continued to meet monthly, virtually, with good attendance from partners.

4. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 4.1 This report is intended to provide an update on current progress on the work carried out as part of the Community Safety and Crime Reduction Strategy, this section is not applicable. Ways of achieving the aims set out in the partnership Strategy are considered based on the annual strategic assessment of crime and community safety.

5. COMMUNITY ENGAGEMENT & CONSULTATION

- 5.1 The Strategic Assessment on which the current Strategy is based was carried out in the in December 2019 and included a consultation event on the findings and proposed priorities for 2020-23. Invited participants included members of the Community Safety Partnership Board, and community and voluntary sector partners, including representatives of Local Action Teams and communities of interest.

- 5.2 A draft of the Community Safety Strategy was made available for public comment via the consultation portal and in more targeted arenas.

6. CONCLUSION

- 6.1 This report provides an update of progress on work under the Community Safety and Crime Reduction Strategy 2020-23.

7. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

This report is for noting and there are no direct financial implications arising from the recommendation made.

Finance Officer Consulted: Michael Bentley

Date: 15/02/22

Legal Implications:

There is a statutory requirement under the 1998 Crime and Disorder Act to have a strategy. There are no legal implications relating to this report which is for noting.

Lawyer Consulted: Alice Rowland

Date: 15/2/22

Equalities Implications:

- 7.1 The Community Safety and Crime Reduction Strategy is subject to an ongoing and embedded equality impact assessment where specific actions and activities are identified and assessed for equality impact. The work around hate crime helps us to address our responsibilities under the Equalities Act.

Sustainability Implications:

- 7.2 None

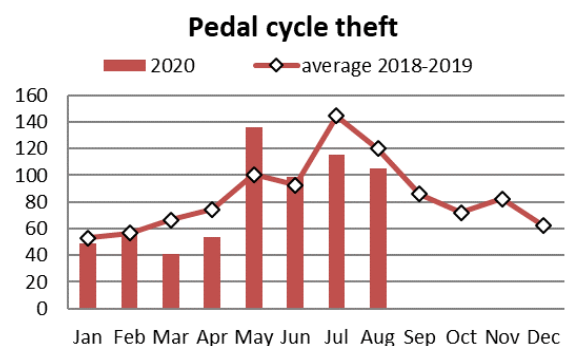
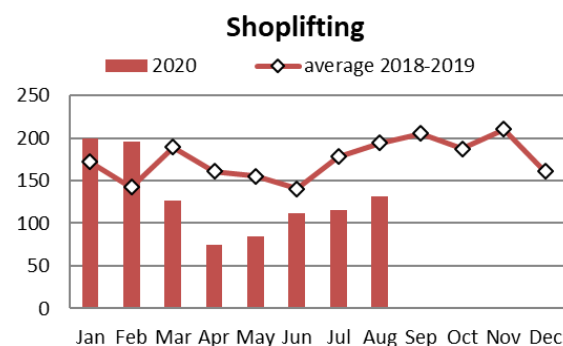
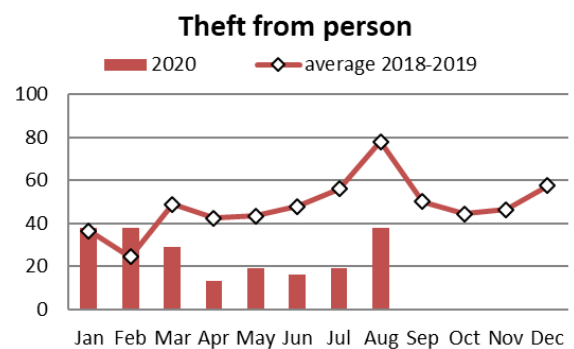
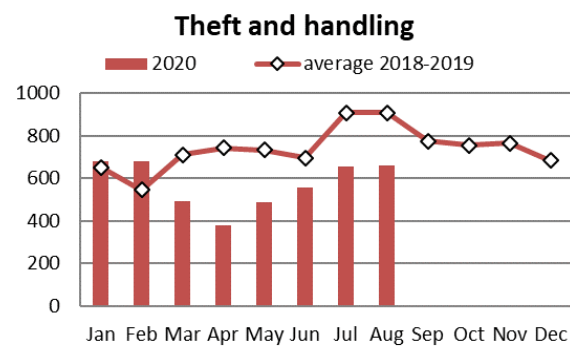
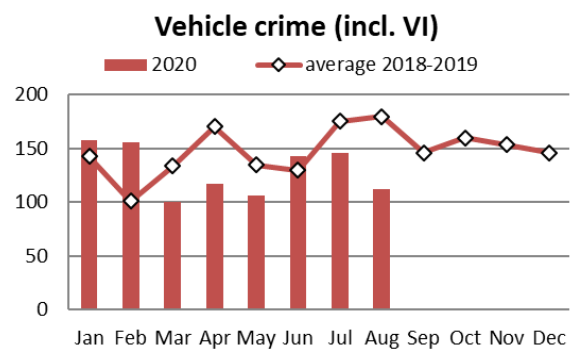
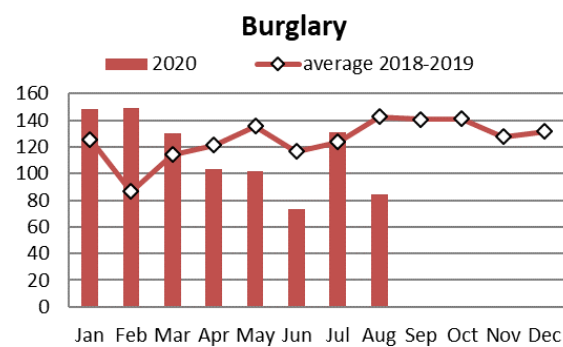
Appendix 1. Briefing note to Full Council on the Community Safety and Crime Reduction Strategy and Covid

INSERT

Appendix 2: Recorded crimes and incidents per month in 2020 compared with average or previous two years

Total Crimes																																																																															
<div><p>Total crime</p><p>2020 average 2018-2019</p><table><tr><th>Month</th><th>2020</th><th>Average 2018-2019</th></tr><tr><td>Jan</td><td>2200</td><td>2100</td></tr><tr><td>Feb</td><td>2300</td><td>1800</td></tr><tr><td>Mar</td><td>1900</td><td>2100</td></tr><tr><td>Apr</td><td>1800</td><td>2300</td></tr><tr><td>May</td><td>1900</td><td>2300</td></tr><tr><td>Jun</td><td>2200</td><td>2300</td></tr><tr><td>Jul</td><td>2500</td><td>2600</td></tr><tr><td>Aug</td><td>2700</td><td>2700</td></tr><tr><td>Sep</td><td>2400</td><td>2400</td></tr><tr><td>Oct</td><td>2400</td><td>2400</td></tr><tr><td>Nov</td><td>2400</td><td>2400</td></tr><tr><td>Dec</td><td>2200</td><td>2200</td></tr></table></div>	Month	2020	Average 2018-2019	Jan	2200	2100	Feb	2300	1800	Mar	1900	2100	Apr	1800	2300	May	1900	2300	Jun	2200	2300	Jul	2500	2600	Aug	2700	2700	Sep	2400	2400	Oct	2400	2400	Nov	2400	2400	Dec	2200	2200	<div><p>Total recorded crime per month compared with the average of the same months in 2018 and 2019:</p><ul style="list-style-type: none">○ Feb, up 29%○ Mar, down 11%○ Apr, down 21%○ May, down 16%○ Jun, down 5%○ Jul, down 5%○ Aug, up 2%</div>																																							
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<div><p>Assault with less serious injury</p><p>2020 average 2018-2019</p><table><tr><th>Month</th><th>2020</th><th>Average 2018-2019</th></tr><tr><td>Jan</td><td>250</td><td>200</td></tr><tr><td>Feb</td><td>200</td><td>180</td></tr><tr><td>Mar</td><td>220</td><td>220</td></tr><tr><td>Apr</td><td>180</td><td>250</td></tr><tr><td>May</td><td>220</td><td>250</td></tr><tr><td>Jun</td><td>190</td><td>230</td></tr><tr><td>Jul</td><td>260</td><td>260</td></tr><tr><td>Aug</td><td>280</td><td>270</td></tr><tr><td>Sep</td><td>220</td><td>220</td></tr><tr><td>Oct</td><td>240</td><td>240</td></tr><tr><td>Nov</td><td>220</td><td>220</td></tr><tr><td>Dec</td><td>230</td><td>230</td></tr></table></div>	Month	2020	Average 2018-2019	Jan	250	200	Feb	200	180	Mar	220	220	Apr	180	250	May	220	250	Jun	190	230	Jul	260	260	Aug	280	270	Sep	220	220	Oct	240	240	Nov	220	220	Dec	230	230	<div><p>Common assault</p><p>2020 average 2018-2019</p><table><tr><th>Month</th><th>2020</th><th>Average 2018-2019</th></tr><tr><td>Jan</td><td>280</td><td>280</td></tr><tr><td>Feb</td><td>250</td><td>250</td></tr><tr><td>Mar</td><td>270</td><td>270</td></tr><tr><td>Apr</td><td>260</td><td>290</td></tr><tr><td>May</td><td>260</td><td>300</td></tr><tr><td>Jun</td><td>310</td><td>310</td></tr><tr><td>Jul</td><td>360</td><td>360</td></tr><tr><td>Aug</td><td>410</td><td>330</td></tr><tr><td>Sep</td><td>310</td><td>310</td></tr><tr><td>Oct</td><td>290</td><td>290</td></tr><tr><td>Nov</td><td>280</td><td>280</td></tr><tr><td>Dec</td><td>270</td><td>270</td></tr></table></div>	Month	2020	Average 2018-2019	Jan	280	280	Feb	250	250	Mar	270	270	Apr	260	290	May	260	300	Jun	310	310	Jul	360	360	Aug	410	330	Sep	310	310	Oct	290	290	Nov	280	280	Dec	270	270
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Aug	280	270																																																																													
Sep	220	220																																																																													
Oct	240	240																																																																													
Nov	220	220																																																																													
Dec	230	230																																																																													
Month	2020	Average 2018-2019																																																																													
Jan	280	280																																																																													
Feb	250	250																																																																													
Mar	270	270																																																																													
Apr	260	290																																																																													
May	260	300																																																																													
Jun	310	310																																																																													
Jul	360	360																																																																													
Aug	410	330																																																																													
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Oct	290	290																																																																													
Nov	280	280																																																																													
Dec	270	270																																																																													
<p>All violence against the person (VAP) crimes in the year up to Feb were showing about a 10% increase on 2018/19. In the months since then total VAP crimes have generally a similar trend to the previous two years. However, just looking a violent crimes which happened in a public place, numbers were depressed during the early Covid months of April and May, but have steadily climbed in the subsequent months, and by Aug, numbers were actually higher than the average of the previous two Augusts.</p> <p>The subgroups of assault with less serious injury and common assault show a similar pattern to all VAP and to public place violence.</p>																																																																															

Acquisitive Crimes



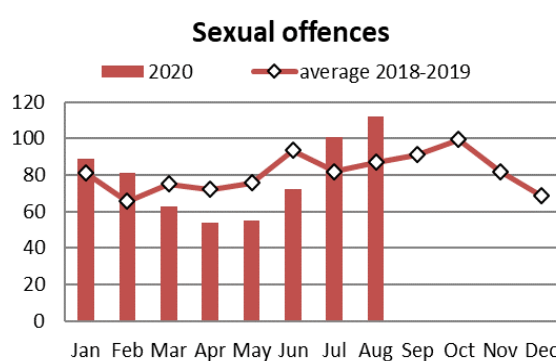
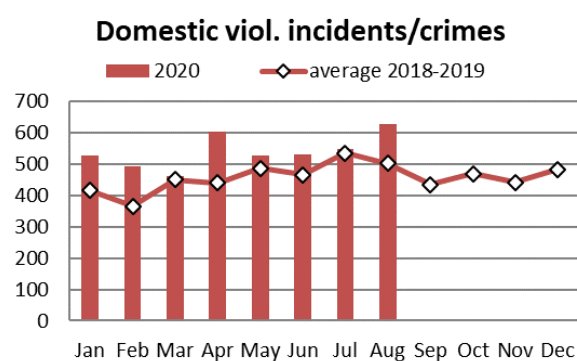
Most acquisitive crime groups were similar or higher in Jan and Feb compared with last 2 years.

Burglary data here is a combination of residential and non-residential and numbers have steadily dropped over the first half of 2020, before a jump up in Jul, but dropping back in Aug.

Crimes typically associated with engagement in retail and leisure environments showed a particular decline between Mar and May, but have continued to remain much lower than the previous two year average.

There always tends to be a seasonal pattern to cycle theft associated with how many people are cycling, but in addition to this, there was a spike in cycle thefts in May.

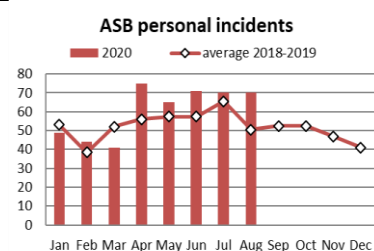
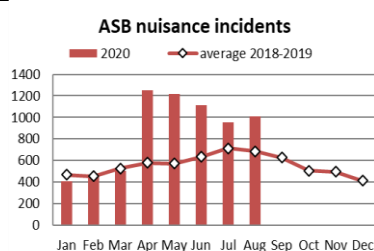
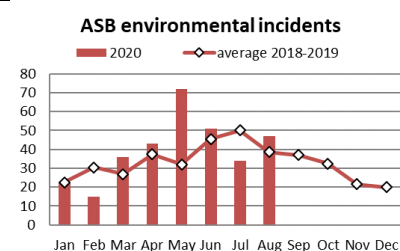
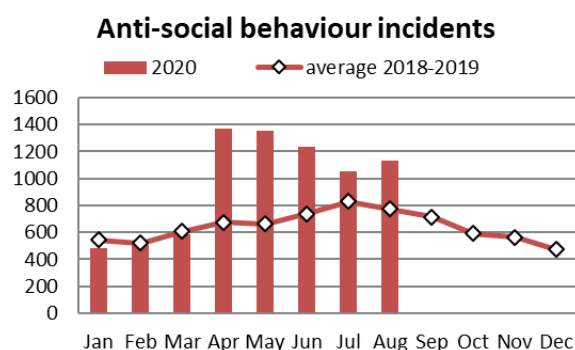
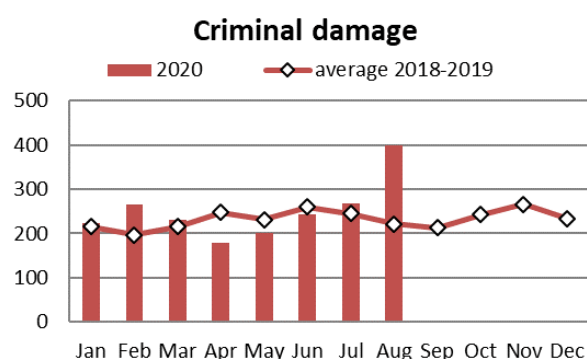
Domestic and sexual violence and abuse



Recorded domestic violence and abuse was up by 17% in the 11m up to Feb. In the months since then, numbers have been higher than the average of the same months of 2018 and 2019, with the months of Apr and Aug particularly so.

Sexual offences showed a drop in the months of Mar to Jun. In previous years, sexual offences have shown a clear link to the night time economy.

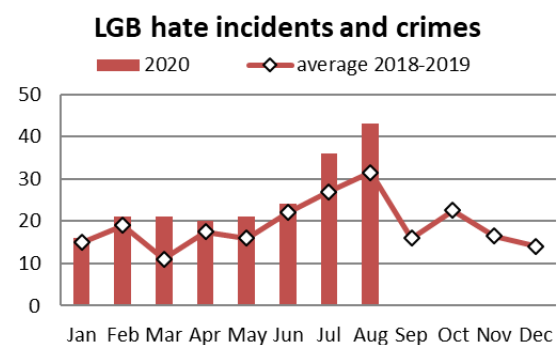
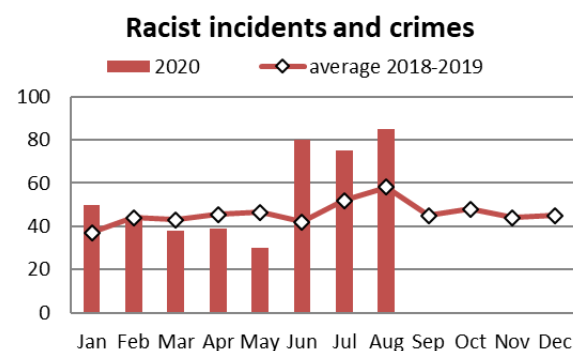
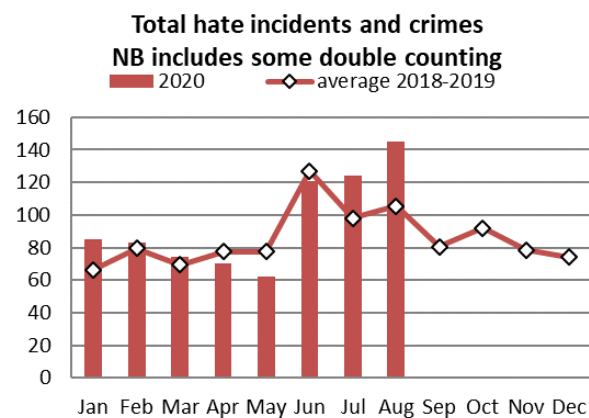
Criminal damage and antisocial behaviour (ASB)



Recorded criminal damage offences were up by 9% in the 11m up to Feb 2020 compared with the same period the year before. There were fewer criminal damage offences recorded in Apr and May than the average of the same months in 2018 and 2019. However, numbers have risen steadily since then, with a particular jump up in August.

In the 11m up to Feb total ASB incidents were down by 9%. While the month of Mar was in line with the previous months, numbers of ASB nuisance incidents suddenly increased in April to more than twice the average of the previous two years. Nuisance ASB reports were mostly responsible for the overall increase since they are the most numerous of the three sub types of ASB incident, but the same general pattern was also seen in personal and environmental ASB.

Hate incidents and crimes

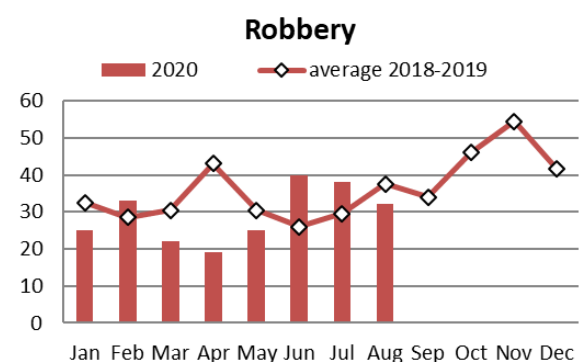
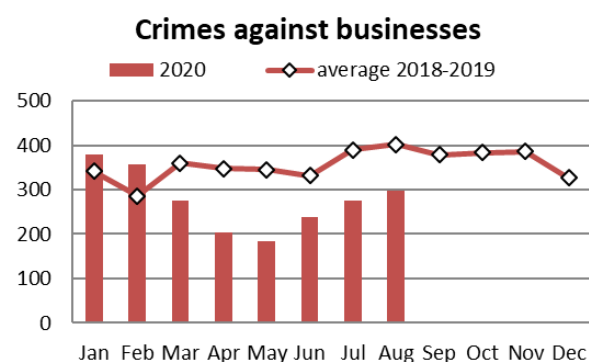


In the 11m up to February 2020 racist, religiously motivated and homophobic incidents and crimes were all showing an increase compared with the previous year, while gender identity and disability motivated crimes were at a roughly similar level.

Total recorded hate crimes during the early lockdown period (Apr and May 2020) were slightly lower than average of the corresponding months in the previous two years. However, racist and LGB hate incidents and crimes have both seen quite a steep rise over the summer months.

Hate incidents and crimes are often associated with the night-time economy which has been affected by the Covid outbreak.

Other



Crimes against business fell in Mar and Apr, and although they have risen in subsequent months, they have remained lower than previous two years.

Robberies (mostly personal robberies) have also dropped in the early lockdown period, presumably linked to fewer people in public spaces reducing opportunities. However, they climbed up during the summer.

LABOUR GROUP AMENDMENT

**Urgent review of Council's policies for tackling crime and
antisocial behaviour**

That changes are made as shown in ***bold italics*** and strikethrough below.

This Committee:

1. Notes that ***certain parts of*** central Brighton LSOA has been ranked ~~8th worst~~ ***poorly*** out of 33,000 areas across England and Wales for crime and antisocial behaviour ***and impact this has on residents' lives.***
2. Notes that since 2010 ***funding to Sussex Police has been cut by Central Government by over 13 million pounds and 500 officers which has had this*** Council has significantly weakened its policies for tackling ~~impact on~~ crime and anti-social behaviour ***rates.*** including:
 - a. ~~Failing to renew the City's Public Space Protection Orders for Parks and Open Spaces;~~
 - b. ~~Declining an opportunity to join an application for Safer Streets Funds when approached by the Office of the Police and Crime Commissioner;~~
 - c. ~~Failing to keep a full complement of Field Officers employed;~~
 - d. ~~Becoming the only Council in the country to introduce a Homeless Bill of Rights that allows begging and tents in public spaces;~~
 - e. ~~Choosing not to enforce by laws at its disposal, including at Old Steine Gardens;~~
 - f. ~~Not prioritising safety in the public domain, with 9/10 street lamps at Old Steine Gardens left broken for over a year;~~
 - g. ~~Maintaining only 95 public space CCTV cameras across the city.~~
3. ~~Notes that the above policies have put the Council out of step with neighbouring local authorities.~~
3. Notes that these policies are a major issue for women who feel unsafe in parts of the City, including at Pavilion Gardens and surrounds where there have been 7 incidents of rape recorded within three years.
4. ***Notes the multiple examples of unlawful conduct by the Prime Minister and his Government during the lockdown which sets a terrible example to our young people and communities.***
5. ***Notes the recruitment of a new anti-drugs officer and planning of an anti-drug summit in Brighton & Hove, following Labour's budget amendment.***
6. ***Calls on Sussex Police to take a zero-tolerance approach to address repeated drug and alcohol crime in St James St, Turner Area and other central parts of the City.***

7. Calls on the Police and Crime Commissioner to re-prioritise funding to tackle the unacceptable crime rates in parts of central Brighton as well as tackling hate crime.

8. Calls for an urgent review of the City's policies, **practices** and commitment towards tackling crime and antisocial behaviour, with a report to be provided to the next meeting of this Committee, **and asks Sussex Police and the Police and Crime Commissioner's Office to participate in that review.**

Proposed by: Cllr Evans

Seconded by: Cllr Childs

Recommendations to read if carried:

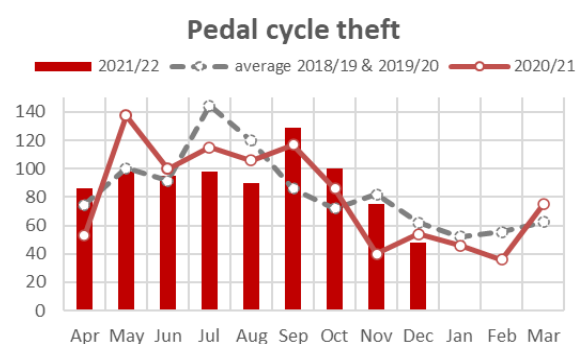
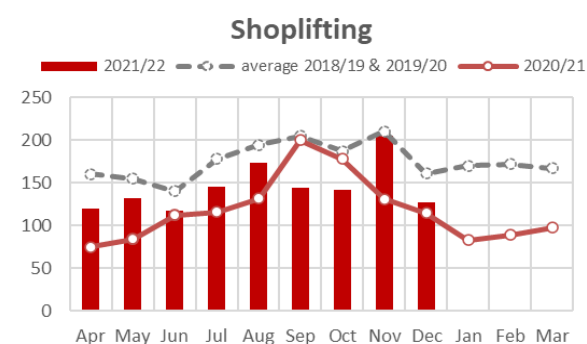
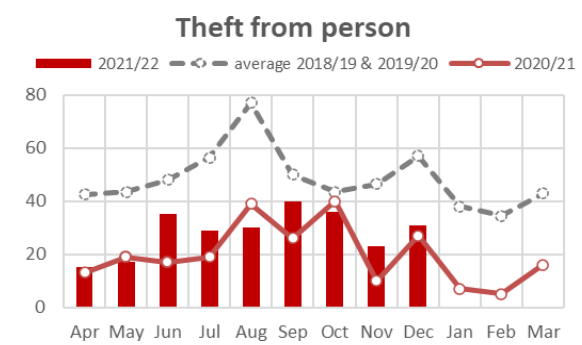
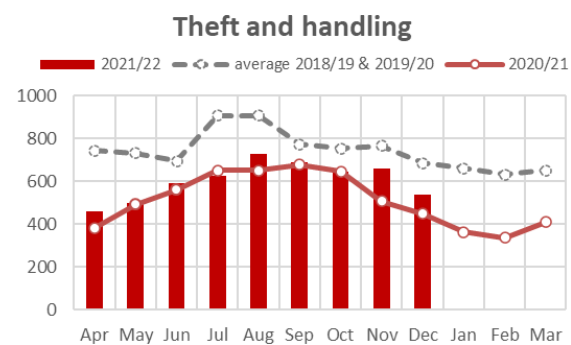
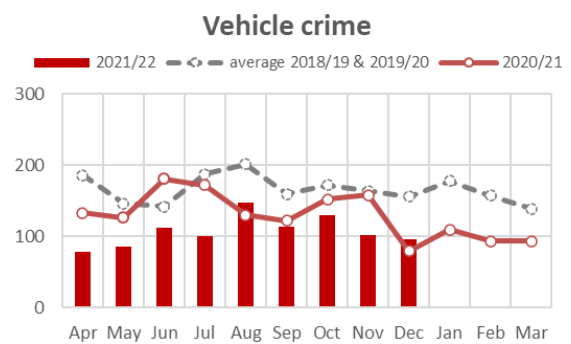
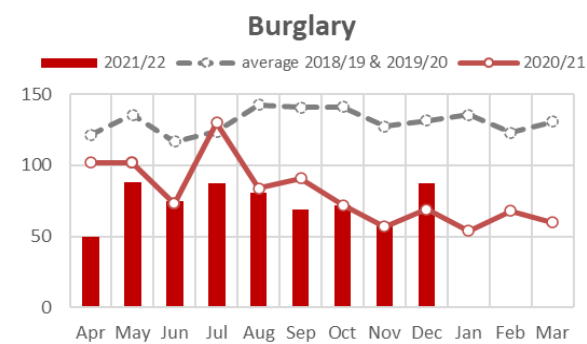
This Committee:

1. Notes that certain parts of central Brighton LSOA has been ranked poorly out of 33,000 areas across England and Wales for crime and antisocial behaviour and impact this has on residents' lives.
2. Notes that since 2010 funding to Sussex Police has been cut by Central Government by over 13 million pounds and 500 officers which has had significant impact on crime and anti-social behaviour rates.
3. Notes that these policies are a major issue for women who feel unsafe in parts of the City, including at Pavilion Gardens and surrounds where there have been 7 incidents of rape recorded within three years.
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Appendix 2: Recorded crimes and incidents per month in 2020/21 (red line) and 2021/22 (red bars) compared with average of the previous two years ('pre-Covid') (grey dotted line)

Total Crimes	
<p>Total crime</p> <p>2021/22 — ◊ — average 2018/19 & 2019/20 — ○ — 2020/21</p> <p>Apr May Jun Jul Aug Sep Oct Nov Dec Jan Feb Mar</p>	<p>Except for late summer in 2020/21, total crime numbers remained below the average of the previous two years ('pre-Covid').</p> <p>Total crimes remained below pre-Covid levels at the beginning of 2021/22, but had regained previous levels in the autumn months, before dropping below again in December.</p>
Violent crimes	
<p>Violence against the person</p> <p>2021/22 — ◊ — average 2018/19 & 2019/20 — ○ — 2020/21</p> <p>Apr May Jun Jul Aug Sep Oct Nov Dec Jan Feb Mar</p>	<p>Public place violence</p> <p>2021/22 — ◊ — average 2018/19 & 2019/20 — ○ — 2020/21</p> <p>Apr May Jun Jul Aug Sep Oct Nov Dec Jan Feb Mar</p>
<p>All injury violence</p> <p>2021/22 — ◊ — average 2018/19 & 2019/20 — ○ — 2020/21</p> <p>Apr May Jun Jul Aug Sep Oct Nov Dec Jan Feb Mar</p>	<p>Serious violence</p> <p>2021/22 — ◊ — average 2018/19 & 2019/20 — ○ — 2020/21</p> <p>Apr May Jun Jul Aug Sep Oct Nov Dec Jan Feb Mar</p>
<p>All violence against the person (VAP) crimes in 2020/21 were higher than pre-Covid during the summer months when restrictions were relaxed, but lower during periods of greater Covid restrictions, especially so during the late autumn and winter months. This pattern was particularly strong when looking at violent crimes in a public place. Injury violence mostly remained below pre-Covid levels in 2020/21.</p> <p>In 2021/22 to date all VAP, including that in a public place has exceeded pre-Covid levels, particularly so in the autumn months but resumed more typical levels in December. In the case of injury violence, the pattern was similar, but less marked.</p>	

Acquisitive Crimes



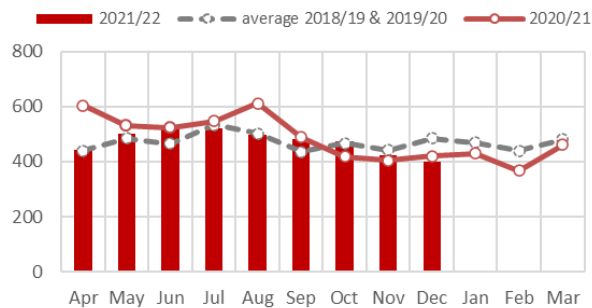
Across most acquisitive crime groups, the number of recorded crimes was on the whole notably higher pre-Covid than in 2020/21 or 2021/22 to date. With burglaries (this includes both residential and non-residential) the drop has been considerable, with the single month of July 2021 being an exception.

The lower number of theft and handling offences (which include theft from person and shoplifting) and also vehicle crimes to an extent, are likely to be strongly linked to the restrictions on the operations of shops and licensed premises since April 2020.

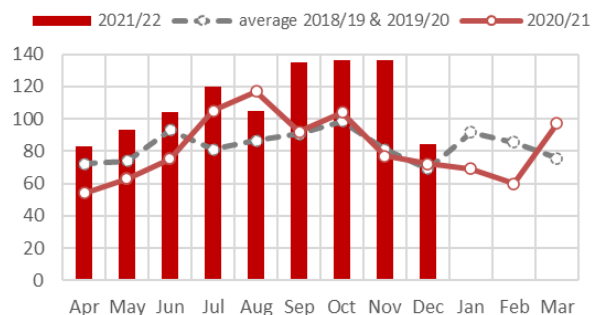
The picture with cycle thefts is less clear. There was a peak in May 2020 as people (perhaps those less familiar with, or equipped for, the need for cycle security) took to their bicycles for exercise during lockdown, but generally cycle thefts have fluctuated above or below pre-Covid levels.

Domestic and sexual violence and abuse

Domestic violence incidents/crimes



Sexual offences



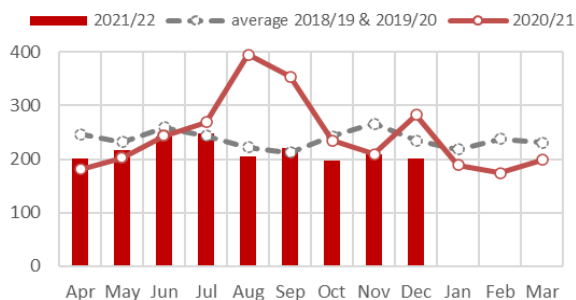
Police-recorded domestic violence was higher than pre-Covid in the first six months of 2020/21, but since then has been at a similar level or lower.

There is a different picture with sexual offences, which tend to have an association with the night-time economy. During 2020/21 sexual offences were lower than pre-Covid, except for the summer and autumn when they were higher or at a similar level. Since March 2021 numbers have been consistently higher than pre-Covid levels, particularly so between July and November.

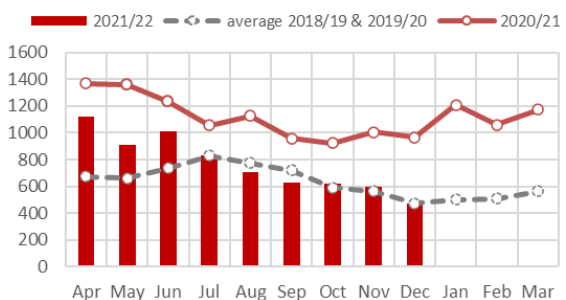
Sexual offences showed a drop in the months of Mar to Jun. In previous years, sexual offences have shown a clear link to the night time economy.

Criminal damage and antisocial behaviour (ASB)

Criminal damage



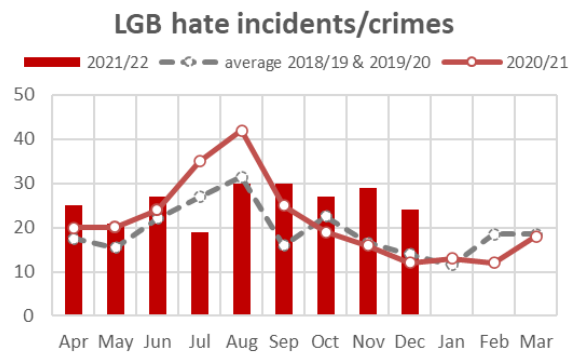
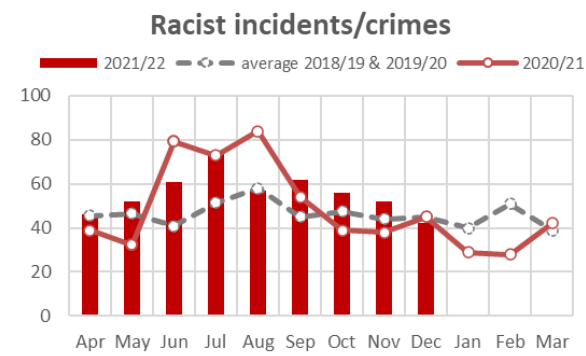
Anti-social behaviour incidents



Police recorded criminal damage showed a particular peak in August and September 2020, but other than that, have mostly remained at or below pre-Covid levels.

Covid restrictions had a big impact on the number of ASB incidents recorded. At the onset of the initial lockdown in April 2020 numbers jumped up, and this was mainly driven by contraventions of social distancing requirements, generally recorded as ASB nuisance incidents. Numbers of ASB incidents remained above pre-Covid levels until June 2021, since when they have reverted to pre-Covid levels.

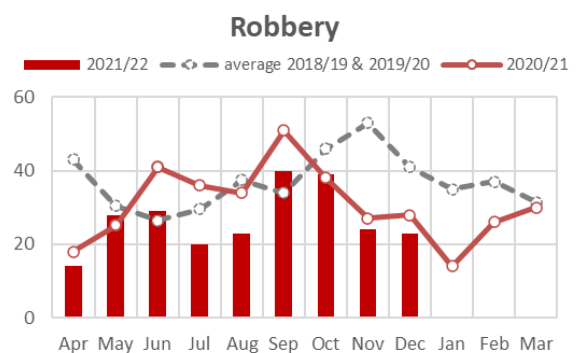
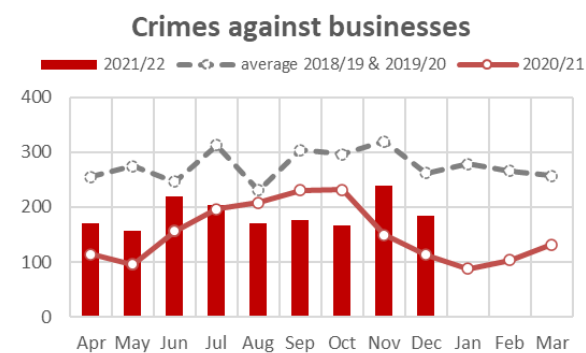
Hate incidents and crimes



The summer of 2020 saw particularly heightened numbers of recorded racist and LGB hate incidents and crimes compared with pre-Covid levels.

Numbers of racist and LGB incidents and crimes in 2021/22 to date are mostly higher than pre-Covid levels

Other



Since April 2020 crimes against business have remained below pre-Covid levels

Robberies (mostly personal robberies) saw elevated numbers between April and September 2020, but other than that have mostly remained below pre-Covid levels.

Community Safety and Crime Reduction Strategy

2020 – 2023

Updated 2022



Brighton & Hove
Community Safety Partnership

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If you would like to provide any feedback on this document, you can do so by email to:
community.safety@brighton-hove.gov.uk



The Partnership and its work

The Partnership's aims

The Community Safety Partnership's overarching duty is to:

- reduce crime and disorder,
 - improve community safety, and
 - reduce re-offending
- in Brighton & Hove.

This will serve to improve the quality of life for everyone who lives in, works in or visits the city.

The focus is on:

- taking early action to prevent crime and disorder
- tackling the issues which have the biggest impact on people
- reducing fear of crime and meeting the needs of victims.

About this strategy

This strategy lays out the Brighton & Hove Community Safety Partnership's plans for the three year period from 2020-2023. It is a requirement of the Crime and Disorder Act 1998, and this is the second annual review, as required by legislation.

Statutory and other partners

The city is much better placed to tackle crime and disorder if everyone – local residents and businesses, community and voluntary groups, and city services – work together in a coordinated way. The local authority, police, health, probation and fire services are statutory partners under the 1998 Act. However, in practice, the Community Safety Partnership works across a much wider range of partners at different levels and on different topics to work out what needs doing, and who can help.

There is a need for good information exchange between those concerned, including with residents, so that agencies can listen and respond to the needs of local people. At the same time local people need to be able find a route through to the services they need or identify ways in which they can respond within their own communities.

As well as the impact on individuals and communities, the negative effects of crime and disorder increase demand on public services. Working in partnership and adopting a 'whole system approach' is essential. Our work contributes to, and overlaps with, the Police & Crime Commissioner's Police and Crime Plan¹, to the council's Corporate Plan², and to measures in the Public Health Outcomes Framework to name a few examples.

Setting our work in context

Politicians and legislators can impact broadly on the legal and social setting in which we all live. The work of central government departments is also important in our wider partnership. In March 2016 the Home Office issued their 'Modern Crime Prevention Strategy'³. This argued that although crime is changing in its nature, for example with a growth in 'cyber crime', the reasons behind people committing crime – 'drivers of crime', listed as opportunity; character; profit; drugs; alcohol and the criminal justice system – are the same.

¹ <https://www.sussex-pcc.gov.uk/media/5620/sussex-police-crime-plan-2021-24.pdf>

² [Our plan 2020 to 2023 \(brighton-hove.gov.uk\)](https://www.brighton-hove.gov.uk/our-plan-2020-to-2023)

³ Home Office (2016) Modern Crime Prevention Strategy, https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/509831/6.1770_Modern_Crime_Prevention_Strategy_final_WEB_version.pdf



Brighton & Hove and the people in the city

The information in the next two sections has been taken from the Strategic Assessment of Crime and Community Safety 2021. To request a copy, please contact community.safety@brighton-hove.gov.uk

Our residents and visitors

People with many different characteristics contribute to the makeup of the local population, and crime and disorder issues impact on people differently.

The 2011 census found that the city had 273,400 residents and this was estimated to have increased to 291,700 by 2020. It is predicted that by 2030 it will have reached 303,000.

Compared with England and the South East, Brighton & Hove has fewer children and older people, and more younger adults, particularly in their 20s and early 30s. Contributing to people in this age group are those who come to the city to study; in 2019/20 there were 38,380 students enrolled at the two local universities. Also, Brighton & Hove was estimated to have 1,800 short term⁴ international students in 2017, with many more visiting for a shorter period.

In 2019 around 10.7 million trips were estimated to have been made to the city by day visitors, up 12% on 2018, with over 5.4 million overnight stays. This will have reduced significantly in 2020.

At the time of the 2011 census, there were 147 residents employed by the armed services, and in 2018 532 veterans were receiving pension or compensation related to military service, proportionately fewer than the South East and England.

According to the 2011 census, 19.5% of the resident population belonged to a non-White British ethnic group (53,400 people), defined here as Black or Minority

Ethnic or BME, an increase of 12% on the 2001 census. 37% of BME residents were 'White Other than British', 21% Asian/Asian British, and the mixed/multiple ethnic group made up 20%.

The lesbian, gay, and bisexual population makes up between an estimated 11-15% of our population, equating to between 27,200 and 37,500 residents based on 2020 population estimates. It is estimated that there are between 1,500 and 2,500 trans adults living in Brighton & Hove, with many more coming to the city as visitors.

In 2020, among residents aged 18 to 64, there were an estimated 38,400 people with a common mental health disorder and 9,100 people with impaired mobility. There were an estimated 5,900 people aged over 18 with a learning difficulty.

In 2019/20 9% of city residents surveyed reported low levels of happiness and 27% reported high levels of anxiety, both measures higher than the South East and England.

The day-to-day activities of 16% of city residents are 'limited a little' or 'limited a lot' by health problems (Census 2011). These residents are on average less likely to feel safe in the city.

Regarding children, there were 1,920 Children in Need and 273 children who were the subject of a child protection plan in the city as of March 2021, both proportionally higher than the South East and England. National evidence shows that people who have been looked after as children are more likely to be unemployed, be involved in crime and be identified as having a substance misuse problem.

⁴ Short term defined as staying here for between 3 and 12 months.

Social and economic factors

The Index of Multiple Deprivation 2019 ranked Brighton & Hove 131st out of 326 of all local authorities in England, slightly more deprived than the England average. However, the level of deprivation varies widely across the city, with some of the more deprived being in the east.

There were an estimated 8,300 unemployed people in the city in the twelve months up to September 2021.⁵ This represents 4.8% of all those who were economically active⁶ and is similar to the position nationally (4.8%) and in the South East (3.9%).

One in five (21%) respondents to the City Tracker survey 2018 reported that they did not feel they would have enough money, after meeting housing costs, in the next year to meet basic living costs such as food and heating.

Between 2.9% and 4.4% of 16-17 year olds (up to 220 young people) were not in education, training or employment in the three months ending February 2021.

Housing and homelessness

Brighton & Hove had 126,827 homes at the time of the 2011 census, with an average household size of 2.2 occupants.

The city has fewer owner occupiers and more people renting from private landlords than the average for the South East and England as a whole.

According to the Homelessness and Rough Sleeping Strategy 2020-25, 876 people had been found sleeping rough in a recent two year period in the city. The cost of housing for people on low incomes remains a problem.

...and what we don't know

We need to remain aware that not all of the people in the city will feature in the various statistics at our disposal, or come to the attention of services. This 'invisible' or unidentified population may be among the most vulnerable to crime and community safety problems and extra focus is needed in order get help to them if they need it.

Meeting our equalities duty

The Equality Act 2010 requires that public sector bodies consider and take account of how different types of people – those with 'protected characteristics' – are impacted by their work. Our Strategic Assessment in 2019 reported on how different people are affected by crime and safety issues. The process of determining our priorities and actions takes these findings into account.

⁵ Unemployed refers to people who were actively seeking work or who had found work and were waiting for it to commence.

⁶ Economically active refers to those who are either employed or who are unemployed according to the above definition.



Crime and disorder overview

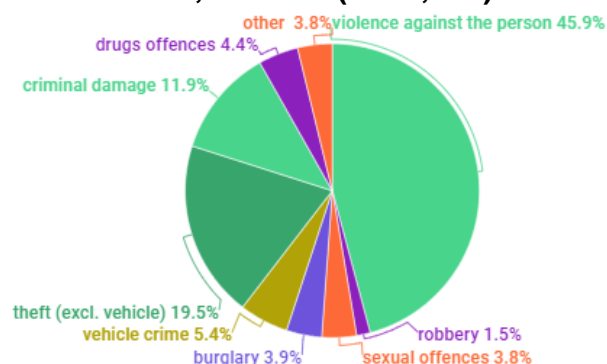
Nature and scale of crimes

There were 24,604 police recorded crimes in 2020/21, down from 29,393 in 2019/20, with the difference being strongly influenced by Covid. The crime rate per 1,000 population in 2020/21 was 84.9, a little higher than the average of our group of 15 'matched' partnerships (84.5).

The pie chart in Fig. 1 shows that violence against the person made up 46% of all recorded crime, with theft offences (incl. vehicle crime) being the next biggest crime group (25%), followed by criminal damage (12%), burglary (4%) and sexual offences (3%). Compared with 2019/20, all main crime groups showed a drop in number in 2020/21, with acquisitive crimes showing the biggest drop.

14% of all crimes in 2020/21 were related to domestic violence or abuse.

Fig. 1. Total police recorded crime breakdown, 2020/21 (n=24,604)



The line graph (Fig. 2) shows the trend in total police recorded crime over the last ten years.

Fig. 2. Total police recorded crime, 2011/12 – 2020/21



Numbers of police recorded total crimes showed a decline between 2011/12 and 2013/14. However, there was a turnaround in 2014/15 and numbers have increased year by year up to 2019/20⁷. However, between 2019/20 and 2020/21 there was a 20% drop, strongly linked to the Covid pandemic.

In the first seven months of 2021/22 violent crimes and sexual offences are showing an increase on the same months of both 2020/21 and 2019/20. However, other crime types have dropped further than in the same months of 2020/21.

Police recorded ASB incidents showed the reverse trend to that of crimes in 2020/21. There were 13,436 incidents recorded, up from 7,271 in 2019/20, with this increase being associated with people contravening Covid restrictions. Up to 2019/20, ASB incidents were showing a long term decline.⁸

More information on recorded crimes and incidents is provided in the Strategic Assessment.¹⁴

⁷ The increase seen from 2014/15 onwards was influenced by the Sussex Police response to the national HMIC inspection programme on data integrity which was undertaken during 2013/14 aimed at improving police recording practices. This work had an impact on the recording of violent and sexual offences in particular. A subsequent HMIC inspection in 2016 on data recording by Sussex Police found that improvements have been made, while further areas for

improvement were identified
<http://www.justiceinspectorates.gov.uk/hmic/publication/sussex-crime-data-integrity-inspection-2016/>

⁸ The improvement in crime recording practices mentioned in the previous footnote is likely to have played a part in the long term decline in the number of occurrences classed as ASB incidents.

Crime patterns

The retail and leisure area in the city centre is also the geographical centre for much of the city's crime and disorder.

Seasonal patterns often coincide with the peak visitor season when there are more people in the city to both perpetrate and be victims of crime, and when people tend to spend more time outdoors. Certain crimes are more likely to take place at particular times of day, for example violence occurs more frequently on Friday and Saturday nights, linking with the night-time economy.

Offending and reoffending

There were 1,948 offenders (1,889 adults and 59 young people) in 2019/20 in Brighton & Hove. 30% of the adults and 51% of the young people perpetrating crime in this period went on to reoffend in the following 12 months. These are higher rates than for England & Wales as a whole (25% and 34% respectively).

Alcohol and drug use

Violent crime is frequently associated with alcohol misuse, and habitual drug use can be a driver for acquisitive crimes.³

Measures of alcohol sales and consumption are higher than England, the South East, and also higher than the average of our matched authorities.⁹

Estimates based on modelling from 2016/17 show that, compared with the South East and with England, the proportion of the city's resident population using opiates or crack cocaine is higher.¹⁰

Hidden crime and criminal groups

It is necessary to remain aware that crimes may be hidden from sight. Criminal behaviour continues to evolve while pressures on victims to remain silent can persist. Organised crime groups can widen the geography of both perpetrators and victims in areas such as child sexual abuse, drug dealing and human trafficking. Partnerships play an important role in addressing these issues.

Impact on quality of life

National research found that in 2019/20 8% of survey respondents reported feeling a high level of worry about violent crime, 10% about burglary, 19% about fraud, and 7% of car owners had a high level of worry about car crime. Women tended to worry more than men, as did people from Asian/Asian British or Black/Black British ethnic groups, those in more routine occupations or unemployed, and those living in more deprived areas.¹¹

Locally, nearly all residents (96%) surveyed in the 2018 City Tracker survey reported feeling safe in their local area during the day, but after dark this dropped to 80% in their local area and 64% in the city centre. Females, those with not enough money to meet basic needs, and those with a long term illness or disability reported feeling comparatively less safe than average, especially after dark.

Financial impact

The financial impact of crime is significant. Estimated costs of crime have been provided by the Home Office and cover, for example, physical/emotional harm, lost output,

⁹<https://fingertips.phe.org.uk/profile/local-alcohol-profiles> accessed Jan 2021

¹⁰ <https://www.gov.uk/government/publications/opiate-and-crack-cocaine-use-prevalence-estimates-for-local-populations>

¹¹ Crime in England & Wales: Annual supplementary tables.
<https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/datasets/crimeinenglandandwalesannualsupplementarytables>

value of property stolen/damaged, and the cost of health, police and other public services in response to crime.¹²

The average cost of each crime that takes place is estimated at:

- £14,100 for a violent crime with injury/£5,900 without injury
- £5,900 for a domestic burglary
- £10,300 for a theft of a vehicle/£870 for a theft from a vehicle
- £8,400 for arson/£1,400 for other criminal damage
- £39,400 for rape and £6,500 for other sexual offences

Costs are generally higher if they relate to commercial crimes.

¹² [The economic and social costs of crime, Home Office, 2018](#)



Current landscape

The last few years have seen some significant national and international developments which have affected the landscape in which our work to reduce crime and disorder is set.

The European Union membership referendum in 2016, which resulted in the UK voting to leave the EU, provided an opportunity for the voicing of different views around immigration. A sense that the expression of far right views was becoming 'normalised' was previously reported, but this has appeared to have lessened. Black Lives Matter demonstrations during 2020 also brought out vocal opposing narratives.

Nationally, the Crime Survey England & Wales reported that, linked to Covid restrictions, in 2020/21 total crime levels excluding fraud and computer misuse had decreased by 19% compared with 2018/19, with theft offences in particular showing a drop. However, fraud and computer misuse had gone up by 36%, so the overall total number of crimes was similar.¹³

Covid changed the dynamics around community cohesion in a number of ways. While there were numerous examples of support from our local communities to help others in need during the Covid lockdown periods, it also resulted in new contexts for hate incidents to occur, for example around the wearing of masks or stigmatising people of different ethnicities.

Besides the immediate impact of the Covid pandemic, there is also the potential of longer term issues. While the government provided a financial cushion for those whose work has been affected by Covid during 2020, the longer term impact on the economy, coupled with

rising living costs, may lead to increased hardship. The negative impact on mental health and the disruption to education are other examples where Covid may have had detrimental effects and result in increased demand for services.

The cost of housing in Brighton & Hove remains an additional pressure, making access to suitable housing for those on lower incomes very difficult. Inadequate housing may contribute to pressures on those at risk of offending.

The threat of terrorism remains present nationally. Since 2019 the threat level has fluctuated between 'substantial' meaning that an attack is likely and 'severe' meaning an attack is highly likely. It was raised to 'severe' in November 2021, but was reduced once again to 'substantial' in February 2022.

Creative ideas which lead to new ways of working effectively, but which cost less or are cost neutral, will continue to be needed. For example, while the penetration of the internet and social media into daily lives changes the nature of risks, it can also offer new opportunities for public services to engage with communities. The Covid pandemic accelerated the development of internet-based services.

¹³ Crime in England and Wales: year ending March 2021. [Crime in England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/crimeandstatistics/crimeinenglandandwales)



Identifying and progressing priorities

Identifying and progressing priorities

Local analysis

Our plans for the three year period from April 2020 to March 2023 were informed initially by the Brighton & Hove Strategic Assessment of Crime and Community Safety 2019. This looked at the crime and community safety picture in the city. It considered the nature and scale of problems, trends, the impact on communities and individuals, and so on.

The Strategic Assessment 2021¹⁴ reviewed progress on key measures and actions over the last year, and considered the impact of changes in national and local context, including around funding. This led to conclusions around the strategy should be updated in its third year.

The work for the 2021 Strategic Assessment was carried out jointly by officers with lead responsibility for each priority area and analysts in the council's Public Health Intelligence Team.

The focus of our partnership strategy

The priorities in this strategy focus on areas where working in partnership is fundamental to achieving progress. It prioritises work where added value is achieved by working in partnership.

There are three overarching themes in this strategy: violence, abuse and exploitation, anti-social behaviour, and community cohesion and resilience. The priority areas reflect both national and local priorities, with a particular focus on areas where the impact on victims is high.

Considerations around resources

Budgets of public organisations have been reducing and budgets remain tight.

Difficult decisions need to be made about whether to allocate scarce resources to prevention work or to responding to the impact of crimes and supporting victims after they have occurred. Without investment in prevention work, there is the risk that significant problems will be stored up for the future.

Partnership resources are currently supporting an experienced and skilled workforce. Withdrawing financial support for the work they carry out risks resulting in a break in continuity of services which will take considerable effort to re-establish.

Monitoring the effectiveness of our work

The impact that we are aiming to achieve through our partnership work is laid out at the beginning of each priority area in this strategy.

Action plans are drawn up for each of our priority areas, laying out timescales and assigning responsibility for taking the work forward. Progress is monitored through thematic steering groups or forums, and the Community Safety Partnership Board also keeps progress under review at a more strategic level.

Individual measures of crime and community safety are rarely able to describe the complete picture of underlying problems and do not allow us to fully understand the effectiveness of our work. Our approach to this is to monitor groups of performance indicators for each priority area which together contribute to the overall picture. The data need to be carefully interpreted to avoid drawing misplaced conclusions.

¹⁴ Contact community.safety@brighton-hove.gov.uk to request a copy of the 2021 Strategic Assessment of Crime and Community



Relevant work of key partners

The work of key partners

There are a number of statutory agencies whose core business is to tackle crime – the police, youth offending service, courts, probation and prison services are some significant ones. The work of other agencies, for example health and social services, is also key to reducing the ‘drivers’ of crime.

These partners have their own plans/strategies, and may work across wider geographical areas. Community Safety Partnerships also exist in East and West Sussex and in some areas of work projects operate across boundaries.

Mentioned below are some important areas of work which are managed by our partners and not described in detail in this strategy document.

Relevant work streams led by others

Children’s services. Brighton & Hove’s work with young people who are engaged in criminal behaviour is part of the council’s Adolescent Service. The Youth Justice Plan is integrated within the Complex Adolescent Strategy 2020-23. It has the following priorities:

- Divert children away from the Criminal Justice System
- Gain a better understanding of why children reoffend in order to respond appropriately
- Maintain a low number of custodial sentences and to avoid wherever possible
- Embed contextual safeguarding approaches and ensure a robust multi-agency response to child exploitation
- Increase service user participation
- Ensure a shared understanding of children and young people’s substance use, and respond appropriately to reduce harm caused.

This work is overseen by the Adolescent Strategic Management Board which

reports to the Community Safety Partnership Board.

Integrated Offender Management (IOM). There is pan-Sussex operational guidance for the management of adult offenders to reduce reoffending with a Brighton & Hove IOM delivery group. This sets out how police, probation, courts, prisons, health, local authorities and others can support the needs of offenders. The work is overseen by the Sussex Criminal Justice Board. The government has restructured probation services, and from June 2021 there was a shift to a single national probation service, moving away from the previous two-tier system.

Alcohol misuse. The Alcohol Programme Board takes a strategic lead here. Work is structured around the themes of:

- health promotion and reducing harmful drinking
- treatment and recover and
- licensing and the night-time economy.

Drugs misuse. The Substance Misuse Programme Board oversees work around drugs misuse. The group’s work is structured around the themes of:

- health promotion
- harm reduction for users
- responding to emerging trends
- treatment and recovery and
- the availability of drugs.

Mental health services. Many offenders have needs around mental health, often compounded by alcohol and/or drugs misuse. The Police and Court Liaison and Diversion Scheme is a scheme whereby people who are arrested or held in custody are assessed for needs around mental health, alcohol or substance misuse, and can be referred to treatment services.

Homelessness and rough sleeping.

The Homelessness and Rough Sleeping Strategy 2020-2026 has priorities under the headings of prevention, interventions and sustainability.

Private sector housing. The licensing of private landlords includes clauses to manage anti-social behaviour.

Serious and Organised Crime. Sussex Police take the lead on tackling serious and organised crime which impacts across communities and is associated with, for example, drugs, fraud, acquisitive crime, child sexual exploitation and abuse, modern slavery and human trafficking. The cost to society of serious and organised crime is estimated at many billions of pounds a year.¹⁵

Adult and child safeguarding. The city's multi-agency Safeguarding Adults Board works across agencies to raise awareness and promote the welfare of vulnerable adults, and enable people to live safe and secure lives.

The Safeguarding Children Partnership co-ordinates work by all agencies and individuals to safeguard and promote the welfare of children and young people.

East Sussex Fire & Rescue Service.

Core business of ESFRS is to reduce the risk of and harm from fires in people's homes and in communities. They work closely with partners, including housing providers, and local communities to provide awareness and education on fire safety in the home and fit smoke alarms where appropriate.

ESFRS works in the context of a mixed and ageing housing stock, an ageing population and vulnerabilities of some

residents, overlapping with key populations of interest in the wider community safety context and have a [commitment working in partnership around safeguarding](#).

Road safety. The council's long term Local Transport Plan includes goals to create streets and neighbourhoods that are safe and welcoming for people to move around and use socially. Brighton & Hove City Council is a member of the [Sussex Safer Roads Partnership](#).

'Cyber crime'. There is a joint police Surrey and Sussex Cyber Crime Unit which focuses on crimes which are enabled or perpetrated using communication technologies and the internet.

Regulatory services. Regulatory services and other teams within the local authority, for example, environmental health, may help to address issues such as anti-social behaviour.

The police and council licensing teams and other responsible authorities under the Licensing Act have a responsibility to ensure the licensed premises operate in such a way that they do not cause public nuisance or compromise public safety.

¹⁵ Home Office Research Report 73 (2013), *Understanding organised crime: Estimating the scale and the social and economic costs*

Priority theme

Violence, exploitation and abuse





Serious violence and exploitation

including modern slavery and human trafficking

Our aim: There is less harm caused to individuals and communities in our city by serious violence, knife crime, organised crime, drugs and exploitation

What we want to achieve

- Fewer people harmed by serious violence and to prevent vulnerable people from becoming involved with organised crime networks
- Safeguard vulnerable people who are being exploited and provide a safe effective pathway to enable vulnerable people to exit involvement with organised crime networks
- All parts of the community to be free of the fear of violence, drugs and exploitation, have confidence to report and an increase in awareness of all forms of exploitation, drug harm and serious violent crime
- A thriving night-time economy free from drug and alcohol-related violence.
- A stronger preventative approach to serious violence and exploitation and a decrease in drug-gang related activity through the better use of all available data.

Why this is a priority

Serious violence, or the threat of violence, can have a negative impact on individuals, communities and the city as a whole. It can undermine how safe people feel and their wellbeing. Out of a range of crime groups, offences of violence with injury are estimated have the highest cost impact for the city when costs to individuals and services are all considered. If fear of violence deters residents and visitors from engaging in what the city has to offer in terms of leisure or commerce, that limits people's lives and poses an economic cost to the city.

In 2018 the government published a Serious Violence Strategy, seeking to ensure that key agencies in all local areas tackle serious violence in partnership.

Brighton & Hove Community Safety Partnership invited the Home Office Violence and Vulnerability Unit to undertake a review of the scale and impact of all forms of exploitation in the city in March 2018. This led to violence, vulnerability and exploitation being included into the previous Community Safety and Crime Reduction Strategy in 2018. In addition to this, Brighton & Hove City Council has undertaken an internal review of its compliance in adhering to statutory duties under the Modern Slavery Act 2015.

Crimes involving exploitation often involve the criminal exploitation of children, young people and vulnerable adults on a physical, sexual or financial basis. This is a major concern nationally and within Brighton & Hove. There is national recognition that the links between criminal exploitation, modern slavery and human trafficking are significant, so these crime types have been absorbed into a wider exploitation agenda.

Key facts

Serious violence happens in different contexts: alcohol-related violence, including in connection with the night-time economy, domestic violence, and organised violence (eg. drug-related violence and exploitation).

The restrictions imposed on people's day to day activities due to Covid, particularly during 2020/21 when socialising and access to pubs and clubs was curtailed, were associated with fewer violent crimes and assault-related attendances at A&E. However, over the course of 2021 numbers of violence with injury crimes and attendances at A&E have been rising to a point approaching pre-Covid levels, and violent crimes in the city centre at night at weekends jumped up strongly during the summer of 2021.

Compared with 2020/21, in the first seven months of 2021/22 a higher proportion of A&E assault-related attendances resulted from an assault in outdoor spaces or linked to a licensed premises, and a lower proportion happened in a dwelling. There was a slight increase in the number of A&E assault-related attendances due to stab injuries in the first seven months of 2021/22 compared with the same months of 2020/21.

Crimes involving exploitation tend to be committed in private spaces. There are many factors which make someone vulnerable to exploitation, with more than one factor present increasing the risk. These may include poor mental health, substance misuse, poverty or debt, school exclusion, experience of coercion or abuse, isolation and homelessness. The [Multiple Complex Needs Joint Strategic Needs Assessment](#) found high levels of needs across a number of these risk factors for a significant proportion of city residents. The following reflect levels of vulnerability for some of these risk factors:

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- There were 1,104 episodes of children going missing from home or social care in 2019/20, dropping to 987 in 2020/21. In the first half of 2021/22 there have again been proportionally fewer episodes at 407. An average of 27 children per quarter were reported as missing from social care in 2020/21, rising to an average of 31 per quarter in the first half of 2021/22 and an average of 68 children missing from home in 2020/21, dropping to an average of 63 per quarter in the first half of 2021/22.
- In October 2021 there were 31 children, identified as being at risk or child sexual exploitation or child criminal exploitation, or both forms of exploitation. This has dropped from 40 in October 2020 and 68 in February 2020.
- The number of modern slavery offences recorded by the police in the city in dropped from 55 in 2019/20 to 50 in 2020/21 and in the first half of 2021/22 has proportionally dropped further to 7 crimes.

In terms of 'county lines', gangs involving drug dealers from London and elsewhere may establish a local base such as in this city. Typically they take over the homes of local vulnerable adults (who are often drug users) by force or coercion in a practice referred to as cuckooing. They then use the premises to deal drugs from and recruit local vulnerable (mainly young) people as drugs runners. This leads to anti-social behaviour, violence and safeguarding concerns. There has not been a significant increase in cuckooing cases during Covid and only slight increases during the full lockdown periods. As of September 2021, there were 10 cuckooed properties identified in the city, the same as 12 months before, but down from 15 in May 2020. 9 new cuckooed properties have been identified in the first half of 2021/22.

Current context

Brighton & Hove City Council (BHCC) has recruited to the new role of Drug Impact Reduction Coordinator (in the Safer Communities Team). The central aim of the role is to reduce the harm caused by drugs to our communities. Key to this will be working with the council's Community Engagement Team and other partners to increase public confidence in reporting incidents of drug harm, and to identify safeguarding concerns in neighbourhoods. This will enable us to focus resources appropriately.

Part of the requirement of this new post is to deliver a citywide Drug Summit to work with residents to effectively address drug harm in our communities. In preparation for this, smaller community engagement events (mini summits) are planned to listen to residents and respond effectively. Two events are planned for April 2022. These will involve residents, Sussex Police officers, elected members, council housing, social housing providers and relevant support services such as substance misuse.

In December 2021, central government produced a new drugs strategy, ['From Harm to Hope: a 10-year drugs plan to cut crime and save lives'](#). The strategic priorities focus on breaking drug supply chains, delivering a world-class treatment and recovery system, and achieving a generational shift in demand for drugs. Breaking drug supply is a key component of the current Exploitation and Serious Violence Action Plans.

These priorities will inform ongoing discussions with partnership organisations. Despite the government's strategy being largely concerned with public health priorities, other elements are already aligned with areas of action set out in our current local Exploitation Action Plan, particularly those focused on preventing exploitation and/or supporting those who have been exploited. The government strategy's acknowledgement

of the harm caused by organised drug gangs and consequent exploitation is reflected in the priorities for the Drug Impact Reduction Coordinator post. There is an expectation for new local delivery partnerships, to be accountable for an outcomes framework. Discussions around governance and responsibility are planned for early 2022.

The Sussex Violence Reduction Partnership (VRP) 'hub and spoke' model continues to develop across the county. The hub is a core team made up of a VRP Manager, Analyst and Project Coordinator. The Brighton & Hove 'spoke' VRP is governed by the Brighton & Hove Violence Reduction Partnership (BHVRP) Executive Group and is co-chaired by Sussex Police and BHCC. Sussex VRP (and therefore BHVRP) continues to receive year-on-year funding from the Home Office towards interventions, prevention work and coordination of the partnership at a local level. The Brighton & Hove Safeguarding Children Partnership (BHSCP) Exploitation Subgroup continues to have governance of the Exploitation Action Plan with representation from the local authority, police and health as key safeguarding partners. The Exploitation Subgroup began to meet bi-monthly instead of quarterly due to the ongoing impact of COVID. This decision has now been made permanent. Key representatives from the BHSCP Exploitation Subgroup attend the BHVRP Executive Group.

BHVRP continues to develop operational subgroups focusing on data, communities, locations, victims and perpetrators.

The other main area of development in the city has been in relation to improving our systemic responses to adults with multiple complex needs, something that was highlighted as a significant area of concern in last year's strategic assessment. BHCC was part of a

successful bid to what was then the Ministry of Housing, Communities and Local Government (now the Department of Levelling Up, Housing and Communities) as part of the national Changing Futures programme. This brings £4.4m to Sussex over a three-year period and focuses on systems change, trauma-informed care, lived experience, data and service delivery. Brighton & Hove's Safeguarding Adults Board has recently undertaken a thematic learning review related to women with multiple complex needs and the recommendations from this review are set to be published in early 2022. Together with learning from previous [Safeguarding Adult Reviews](#), these recommendations are to be considered alongside outcomes from the Big Lottery-funded Sussex [Fulfilling Lives](#) project to explore how people with multiple complex needs, who may slip between statutory and non-statutory services, can have better outcomes. All this work will now be overseen by the Sussex Changing Futures programme.

Our plans

Due to the significant crossover of work contained within the previously separate serious violence and exploitation strategy sections and action plans, they are being merged into this single serious violence and exploitation strategy section, supported by a violence and exploitation reduction action plan. There is already work underway to review the relationship between current governance structures such as the BHVRP and BHSCP Exploitation Subgroup to reduce duplication and support operational capacity.

There will be a focus on each of the BHVRP subgroups to ensure that they encompass all elements of exploitation, drug harm and serious violence.

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As part of the Sussex Changing Futures programme, we will explore the possibility of a multi-agency risk meeting for adults with multiple complex needs.

We will develop and deliver drugs summits as part of our greater focus on communications, education and training. This will be reflected in the action plans with a particular focus on drug harm, modern slavery and human trafficking.

Breaking drug supply, as per the new government drug strategy, continues to be reflected in the combined action plan. BHVRP Communities Subgroup will continue to engage with minoritised communities in the city and use their experiences to shape future activity.

Further development work needs to be undertaken in relation to Operation Cuckoo and how we respond to reducing vulnerabilities of adults who are complicit in drug dealing yet who may at the same time be subject to exploitation themselves.

The outcome of the task and finish working group exploring how the city supports refugees, migrants and asylum seekers may influence activity undertaken by the city's Anti-Slavery Network.



Domestic & sexual violence and abuse and other forms of violence against women and girls

Our aim: Everyone, from child to adult, can live safe lives without the threat or experience of domestic and/or sexual violence and abuse (including stalking and harassment and harmful practices)

What we want to achieve

- A city where domestic and sexual violence and abuse is not tolerated by our communities or our organisations.
- Victims to be believed and not blamed, treated with dignity and respect, and supported to feel safe within their community, knowing that their offenders are being worked with to change their behaviour and/or brought to justice.
- All sectors, services, neighbourhoods and communities across the city to recognise that domestic and sexual violence is everyone's business and to overcome barriers to progress. Responsibility for tackling the issue needs to be truly shared.
- More prevention and early intervention work. Evidence based approaches are needed to change attitudes and challenge behaviours in our communities so victims are protected and the cycle of offending is broken.
- High quality trauma-informed service pathways. Coordinated and accessible interventions and support to reflect what people tell us they want and need.
- A stronger criminal and civil justice response to perpetrators, and the development of sustainable proactive intervention and preventative programmes.
- Robust partnership working at both a strategic and operational level across a broad coalition of partners to enable consistent quality services, working across services and sectors and focusing on positive outcomes for victims.

Why this is a priority

In November 2021, the government declared domestic and sexual abuse and violence and the wider forms of violence against women and girls (VAWG) an “urgent national priority”. This means all forms of VAWG have been added to the strategic policing requirement. The national framework for delivery was published in December 2021 and reflects that VAWG must be a strategic priority for all forces and by extension Community Safety Partnerships.

Incidents of domestic and sexual abuse and violence and the wider forms of VAWG occur in private and public spaces. However, the true extent of all forms of VAWG is unknown. Many survivors never report crime incidents or reach out for support.

Key facts

Domestic violence and abuse is a prolific crime. Setting aside those which remain unreported, there were 5,800 police recorded crimes and incidents of domestic abuse in the city in 2020/21. The initial months of Covid restrictions resulted in enhanced levels, but then numbers dropped during the second half of the year, rising again in the first half of 2021/22, broadly rising as Covid restrictions were tightened, and falling as they were relaxed.

There were 989 police recorded sexual offences in the city in 2020/21, including 751 serious sexual offences. There has been a rising trend in these offences over the recent years, and numbers have continued to increase in the first half of 2021/22. Sexual offences often happen in the context of the night-time economy as demonstrated by location and temporal patterns. When Covid restrictions were imposed on clubs and pubs, numbers were consequently depressed. The sexual offence of ‘upskirting’ was introduced in April 2019, although fewer than five offences have

been recorded in the 18 month period up to September 2021.

Regarding other VAWG crime types, there has been a year on year increase in the number of stalking offences since it became a crime in 2012, reaching 549 in 2020/21, although numbers dropped back by 13% in the first six months of 2021/22 compared with the same months in 2020/21. Coercive control was introduced as a crime in 2015 and also saw a year on year increase up to 2019/20 when 273 offences were recorded, although numbers dropped back to 231 in 2020/21 and have shown a further decrease in the first six months of 2021/22. In both cases, the rising trend was likely to have been strongly influenced by increased awareness by services and the public.

There were seven honour-based violence crimes in 2020/21, compared with ten in 2019/20 and 11 in 2018/19. Local evidence of other harmful practices (forced marriage and FGM) is scarce, but it is necessary to remain vigilant to pick up on any cases where support can be provided to those affected.

The weekly MARAC (Multi Agency Risk Assessment Conference) has continued to meet with good attendance from partners. There were 666 high risk cases heard at Brighton & Hove MARAC in the 12 months up to September 2021. This represents to 58 cases per 10,000 of the population, higher than the national average of 46 per 10,000. Compared with national rates, disabled and LGBT survivors are overrepresented in Brighton & Hove MARAC data, while Black Asian Minority Ethnic (BAME) survivors are underrepresented.

Current context

From April 2022, Brighton & Hove’s strategic response to domestic abuse, sexual violence and VAWG will be coordinated by a new unit, which will sit within the council’s Safer Communities Team. A priority focus for the unit will be

to continue to consult on VAWG with those with protected characteristics to ensure they are able to access tailored services. Another key focus will be the development of an enhanced data collection set for domestic abuse, sexual violence and VAWG for the city. The unit will continue to explore potential funding streams to improve the capacity of local offer work to tackle VAWG.

The Domestic Abuse Act 2021 introduced a range of new duties, and the [Domestic Abuse Act 2021 Commencement Schedule](#) set out the dates for each section of the Act to come into effect. The new duties include provisions for the protection for victims and witnesses in legal proceedings, special measures in family proceedings for victims of domestic abuse, and new duties for housing which include granting secure tenancies in cases of domestic abuse. The Act further extends police powers to tackle perpetrators with the introduction of Domestic Abuse Protection Notices (DAPN) and Domestic Abuse Protection Orders (DAPO), both of which come into effect from 2023.

The Act requires local authorities to ensure there is adequate support in safe accommodation for survivors of domestic abuse. In response to the Act, Brighton & Hove has developed an enhanced housing pathway for survivors (more details below).

A further requirement of the Act is the formation of a Domestic Abuse Partnership Board. Brighton & Hove will partner with the other Sussex councils on the pan-Sussex Domestic Abuse Partnership Board. The Board membership consists of statutory and voluntary sector organisations. The workplan of the Board and subgroups will include implementation of the pan-Sussex Strategy for Domestic Abuse Accommodation and Support, 2021-2024. The stakeholder and public consultation for the strategy highlighted

an ongoing need to ensure inclusive services for all survivors.

The recent successful pan-Sussex bid for Home Office Safer Streets funding for the Safety of Women at Night in Public Spaces means that Brighton & Hove will benefit from additional resources. These include: work in schools on healthy relationships; Bystander to Upstander sessions to support people in recognising and challenging unacceptable and misogynistic behaviour; street pastor/street angel and beach patrol schemes; Sussex #MakeHerFeelSafe campaign aimed at addressing unacceptable behaviour by men and boys; VAWG community navigators; and the installation of additional lighting and CCTV in city centre locations, as well as mobile CCTV units.

Our plans

The local authority will continue to work with partners to improve the city-wide response to all forms of VAWG. There are several specialist services in Brighton & Hove, but where we do not have the specialism locally, we will work with national services to enhance local capacity and understanding for meeting the needs of those who have experienced VAWG.

The national [Tackling Violence Against Women and Girls Strategy](#) outlines the government's ambition and commitment to tackling VAWG. The priorities of the national strategy are prevention, supporting victims, pursuing perpetrators, and strengthening the system. In 2022, Brighton & Hove will launch a new Violence Against Women and Girls Strategy which will align with the pan-Sussex Strategic Framework for Domestic and Sexual Violence and Abuse 2020-24, the pan-Sussex Strategy for Domestic Abuse Accommodation and Support 2021-24, as well as the national strategy. Informed by the findings from recent public and stakeholder consultation, the forthcoming Brighton &

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Hove strategy will work with communities and young people, and support the local response to wider forms of VAWG including harmful practices.

National government has committed to improve the response to rape following the recommendations of the [End-to-End Rape Review](#). The review highlighted that prosecutions and convictions for adult rape have fallen nationally, by 59% and 47% respectively, between 2015/16 and 2019/20, and the review is supported by a framework for improvement. The Domestic Abuse, Sexual Violence and VAWG Unit will work with partners to improve the local response to rape and sexual violence.

At the time of writing Brighton & Hove has one Domestic Homicide Review (DHR) in progress. The findings from this will inform practice in Brighton & Hove.

In view of relatively low numbers of BAME survivors receiving support through the MARAC, the new Domestic Abuse, Sexual Violence and VAWG Unit will review work with BAME communities to ensure adequate capacity building. Targeted work will be delivered to raise awareness of local services and how to refer to MARAC.

Brighton & Hove MARAC also has a high repeat victimisation rate at 55% in 2020/21 compared to the Safe Lives recommended repeat rate level of between 28% and 40%. The new Unit will target work to address the high repeat rate and also consider how we work with repeat perpetrators to disrupt their behaviour.

A new Brighton & Hove multi-agency Domestic Abuse Operational Group provides professional and workforce expertise to maintain and improve partnership pathways. It will have oversight of a multi-agency communications strategy and action plan led by the local authority, police and health for delivering regular, clear

messaging, ensuring children, young people and vulnerable adults are aware of support services available.

Brighton & Hove City Council will commence White Ribbon UK accreditation during 2022/23. The [White Ribbon Campaign](#) recognises the positive role that men play in preventing violence against women, based on the understanding that most men are not violent. The White Ribbon Campaign aligns with the global 16 Days of Activism for the Elimination of Violence against Women. On 25 November people show their support for the campaign by pledging never to commit, condone, or remain silent about violence against women and girls in all its forms by wearing a white ribbon.

The new Domestic Abuse Housing Pathway which includes a co-located Housing IDVA (Independent Domestic Abuse Advisor), Flexible Fund, Floating Support and Sanctuary Scheme will enhance the options available to survivors of domestic abuse in the city. The initiative will provide a diverse range of support to survivors to ensure the accommodation they have, including private housing, social housing or any other accommodation type, is safe.

Priority theme

Anti-social behaviour





Anti-social behaviour

Our aim: Anti-social behaviour causes less harm to individuals and communities

What we want to achieve

- Anti-social behaviour (ASB) is addressed appropriately and consistently, making best use of available tools and powers
- ASB committed by priority and repeat perpetrators is reduced
- ASB, risk and harm associated with the street community and unauthorised encampments is reduced
- Harm caused by ASB to our most vulnerable residents is reduced
- Youth ASB is reduced.
- Successes are communicated to key partners and communities

Definition:

Anti-social behaviour is

(a) conduct that has caused, or is likely to cause, harassment, alarm or distress to any person,

(b) conduct capable of causing nuisance or annoyance to a person in relation to that person's occupation of residential premises, or

(c) conduct capable of causing housing-related nuisance or annoyance to any person.

Why this is a priority

Anti-social behaviour (ASB) can adversely affect individuals, communities, and the environment.

ASB affects quality of life and, at its worst, can have a significant negative impact on people's lives and feelings of wellbeing.

Persons committing ASB often have their own vulnerabilities such as substance misuse and/or mental health issues.

Key facts

National guidance and legislation in response to Covid has impacted on the level, type, and location of ASB, including that recorded by the police. Prior to Covid, police-recorded ASB incidents were on a long-term decline, but there was a sharp upturn as the police responded to incidents involving people contravening government restrictions or neighbourhood disputes. During periods of Covid restrictions the hotspot for ASB incidents had shifted away from the city centre, but the first six months of 2021/22 has seen it returned to the city centre. There was a mention of noise in 20% of police recorded ASB incidents during this period. By the end of 2021 recorded incidents had returned to pre-Covid levels.

Reports of ASB to the council's Community Safety Casework Team also show the highest number of reports to be in city centre wards, particularly St Peter's & North Laine, Regency and Queen's Park. St Peter's & North Laine also became a target for criminal damage involving graffiti, as well as incidents of drug litter, which was also reported in various locations along the seafront and in public toilets.

Current context

The Violence Reduction Partnership and Brighton & Hove City Council's (BHCC) Youth Grants programme has allowed the commissioning of extra necessary diversionary services to address youth ASB.

The newly implemented Joint Action Group (JAG) has successfully brought together key partners to work together and put in place operational action plans to address emerging priority ASB concerns across the city. However, current budgetary pressures resulting from BHCC's necessary response to COVID may cause further cuts to council services and those of partners who significantly contribute to this work.

The removal of the "Everybody In" policy for homeless people and the end to the moratorium on evictions that were implemented due to COVID are likely to result in a rise in street homelessness and a possible increase in ASB associated with the street community.

Our plans

The council's Safer Communities Team will continue to co-ordinate strategic work to tackle ASB across the city in partnership with the police and other key partners.

The monthly Partnership Tactical Tasking Command Group and newly implemented JAG will agree and review Community Safety Partnership operational priorities and ensure that available resources are appropriately deployed.

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The Community Safety Casework Team will continue to provide advice and guidance to a wide range of professionals, for example local social housing providers and supported accommodation providers, on best practice in addressing ASB and reducing harm.

Where appropriate, we will make use of the powers introduced in the ASB, Crime and Policing Act 2014, particularly to address behaviour which causes the most harm, such as cuckooing and associated ASB/exploitation, ASB associated with the street community and unauthorised encampments, graffiti, and also to address the behaviour of repeat perpetrators. We will also use restorative practice where appropriate to reduce harm.

Multi-agency work to address harm associated with the street community will be managed through the six-weekly Street Community Partnership Meeting, and the monthly Hate and ASB Risk Assessment Conference (HASBRAC) will manage the harm caused to victims of ASB and address the behaviour of priority and repeat perpetrators.

To address youth ASB and to stop young people involved in ASB becoming prolific offenders, we will continue to commission diversionary activities funded by the Violence Reduction Partnership and Youth Grants programme.

The local authority will continue to implement its new graffiti strategy with the aim of reducing the amount of time graffiti vandalism spends unremoved. The strategy encourages statutory undertakers and large businesses to remove graffiti from their property and allows the council to do that work by default, charging for its time and resources.

Work with partners, whether from the community, voluntary or statutory sector is central to our effectiveness. This

includes keeping in close communication with elected members and residents through Local Action Teams and residents' and community groups. The JAG will co-ordinate this communication with partners and communities.

Priority theme

Community cohesion and resilience





Hate incidents and crimes

Our aim: An increase in trust and confidence in statutory services, fewer hate incidents and crimes, and a reduction in harm to individuals and communities

What we want to achieve

- Trust and confidence in local services is increased so that individuals and communities feel confident to engage with those services
- Hate incidents and crimes and the harm they cause is reduced
- Hate incidents are addressed appropriately and consistently, making best use of available tools and powers
- Hate incidents committed by repeat perpetrators are reduced
- Successes are communicated to key partners and communities

Definition:

*A **hate incident** is any incident which the victim, or anyone else, thinks is based on someone's prejudice towards them because of their race, religion, sexual orientation, disability or because of their gender identity.*

Why this is a priority

People harmed by incidents perpetrated against them because of personal attributes relating to disability, ethnicity/race, religion/fait, sexual orientation or transgender identity tell us this has a significant effect on their quality of life and wellbeing.

People harmed by hate crimes are often more emotionally impacted than persons harmed by other types of crime.

Key facts

Government restrictions imposed due to the pandemic had a direct impact on the number of hate crimes and incidents which often occur in public places or are linked to the night-time economy. Since the onset of the pandemic numbers have tended to be higher when restrictions were less stringent, and lower when restrictions were at their most stringent. Prior to the pandemic there had been a gradually increasing trend in hate crimes and incidents recorded by the police.

Over the past year Brighton & Hove City Council (BHCC) has continued to deliver a package of actions under the Anti-Racism Pledge. The Racial Harassment Forum completed the evaluation of the "Break the Silence" reporting campaign in the summer of 2021. Its findings showed an increased understanding of what constitutes a hate incident following the campaign and also highlighted the importance of agencies providing feedback to community members on their reported cases.

National narratives have drawn attention to migrant crossings leading to increased risk of anti-migrant hate incidents. Also with the Home Office's use of hotels in Brighton & Hove as accommodation for asylum seekers, there is potential for these narratives to have growing local impact. In 2020/21 there were 582 racist and 55 religiously motivated incidents and crimes recorded by the police in the city, and in the first nine months of 2021/22 there were 502 racist and 43 religiously motivated incidents and crimes.

At different stages of the pandemic LGBTQ communities reported loss of safe spaces, with LGBTQ community spaces and commercial venues closed. They reported heightened risk of being targeted with hate incidents in other venues. Switchboard reported that more than one in five survey respondents had experienced unsafe living situations during the pandemic. In 2020/21 there were 257 LGB and 48 transphobic incidents and crimes recorded by the police in the city, and 232 LGB and 44 transphobic incidents and crimes in the first nine months of 2021/22.

With the easing of lockdown and the introduction of guidelines on distancing and face coverings there was anecdotal information about an increase in disability hate incidents, in particular targeting those with hidden disabilities who are exempt from guidelines. Police-recorded disability hate incidents and crimes are low in number, with 65 recorded in the 2020/21, and 55 in the first nine months of 2021/22.

Current context

The loss of the Communities Co-ordinator post in March 2022 due to the removal of Home Office funding, will impact the local authority's ability to take forward some of the actions plan objectives earmarked in the 2022/23 action plan, including supporting the

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Upstanders Network and the delivery of third-party reporting centres.

The budgetary pressures due to BHCC's necessary response to Covid may cause further cuts to non-statutory services, both BHCC and partners, who significantly contribute to partnership working to address hate incidents and crimes and support those persons harmed by such behaviour.

Any further Covid restrictions may limit officers being able to work outside and/or conduct home visits and face to face interventions, and impact upon all partners to undertake ongoing work to address hate incidents and build trust and confidence in communities.

Our plans

The Housing, Neighbourhoods & Communities directorate will continue to co-ordinate strategic work to reduce the harm caused by hate incidents across the city in partnership with the police and other key partners. The Community Safety Casework Team and the Communities, Equalities and Third Sector Team will provide advice and guidance to a wide range of professionals regarding best practice in addressing hate incidents and reducing harm.

The Anti-social Behaviour, Crime and Policing Act 2014 introduced powers which we will make use of where appropriate, particularly to address behaviour of repeat hate incident perpetrators. We will also use restorative practice where appropriate to reduce harm.

The monthly Hate and ASB Risk Assessment Conference (HASBRAC) meeting will manage the harm caused to victims of hate incidents and address the behaviour of priority and repeat perpetrators.

We will seek to increase community and individual knowledge of, and trust and confidence in, statutory services to

increase the reporting of hate incidents and deliver third party reporting centres and mechanisms across the city.

We will continue work with education providers to ensure that bullying is consistently addressed using best hate incident practice and develop preventative educational programmes for hate incident perpetrators.

Working with partners, whether from the community, voluntary or statutory sector is central to our work. This will include keeping in close communication with elected members and local residents through Local Action Teams and residents' and community groups and facilitating dialogue and joint working among diverse community groups.

Challenging extremism

Our aim: A cohesive city where extremist narratives are challenged and people are protected from the harms of extremism

What we want to achieve

- Services and partnerships understand the nature of extremism occurring in our city and work together effectively to reduce the risk and harm of extremism.
- Empowered individuals, community groups and communities recognise extremist narratives and are confident and able to challenge these narratives
- Diverse community groups work collaboratively and visibly together and with services to stand against all forms of extremism, building cohesion and resilience against divisive extremist narratives.

With the introduction of the national Counter-Extremism Strategy in 2015, an expectation was placed on Local Authorities to deliver this strategy in their local area. Following strategic assessment, it was agreed to introduce a Challenging Extremism priority to the Brighton & Hove Community Safety Strategy. The Communities Coordinator was recruited in 2017 with Home Office funding to implement the strategy objectives. This work included raising the profile of the strategy, developing the Upstanders Network, work to challenge underlying hate narratives and encourage reporting of hate crime tackle, and supporting community groups to gain funding for Building a Stronger Britain Together projects (which are now complete).

For the year 2021/22 the Home Office requested that, now this initial embedding work on the counter-extremism strategy was complete, the Community Coordinators re-focus on wider crime types (including hate crime) whilst maintaining the same mechanisms of collaborative work with community

groups. Therefore work relating to hate crime and the Upstanders Network has continued under the Hate Incidents and Crimes section of this strategy, although following the national spending review, funding for the Communities Coordinator post concluded in March 2022.

Issues relating to extremism are now managed under Prevent (see next section).



Prevent

Our aim: Individuals, institutions and communities are resilient to all forms of terrorism and extremism, harm is reduced, and people have higher levels of trust and confidence.

What we want to achieve

- Terrorisms and extremisms are better understood, and frontline staff, partners and communities are better equipped to challenge them
- Individuals vulnerable to being drawn into terrorism and extremism are identified at an early stage and supported to reduce risk
- Individuals at risk of re-engaging in terrorism related activities are identified and supported to reduce risks and rehabilitation
- Key sectors and institutions are better able to manage risks including those posed by extremist speakers, events and groups
- Improved compliance with the Prevent Duty is achieved
- Cohesive communities are resilient to the challenges posed by international, national and local critical incidents, and the risk of harm caused to individuals and communities is reduced.

Why this is a priority

Prevent is a statutory duty and requires 'specified authorities' 'to have due regard to the need to prevent people from being drawn into terrorism'. The Channel Duty requires vulnerable individuals to be supported before their vulnerabilities are exploited by those who want them to embrace terrorism, and before they become involved in criminal terrorist-related activity.

Terrorism remains one of the most direct and immediate risks to the UK's national security. A step change in terrorist threat was noted in 2017 with five terrorist incidents in the UK, and a further nine terrorist incidents have occurred since 2017, three of those in 2020 and two in 2021. Additionally, 32 terrorist plots (18 international terrorism plots and twelve extreme right-wing plots) have been successfully disrupted by the police and security agencies in the UK since March 2017, seven of those during the Covid-19 pandemic. Two further extreme-right wing organisations were proscribed in 2021. The number of disrupted plots and proscribed organisations evidence an increase in the extreme right-wing terrorism threat. Furthermore, counter terrorism investigation numbers have increased to over 800, although the number of arrests has reduced.

In November 2021, the UK terrorism threat level was raised to 'Severe', meaning an attack is highly likely. The threat level was increased following two terrorist incidents occurring in the UK within a month: the tragic [murder of Sir David Amess MP](#) in October; and an [explosion](#) in a taxi in [Liverpool](#). The national threat level was reduced again to 'Substantial' in February 2022. Northern Ireland related terrorism remains a serious threat, particularly in Northern Ireland itself.

Terrorist attacks not only cause loss of life and economic damage, but they also fuel community tensions, and damage

public confidence and community cohesion. International and national incidents impact on inter-community relations locally. Right-wing and Daesh/ Al-Qaida-inspired terrorist groups feed off one another. The most damaging impact is seen in 'normalisation' of these discourses and an associated reduction in challenges/ oppositional voices. Unless the ideologies and the ideologue are challenged and recruitment to these groups stopped, the cycle of violence, criminality and hate incidents will continue with significant resource implications across partners and significant impact on communities.

All of this combines to paint a picture of a sustained and high tempo threat with significant impact. It takes a whole society approach to effectively tackle terrorism. Partnership between communities, statutory and voluntary services is crucial in countering terrorism and building resilience.

Key facts

There were 188 arrests in Great Britain for terrorism-related activity in the 12 months ending September 2021, the lowest for ten years. A record number of those taken into custody were children, comprising one in eight people arrested on suspicion of terror offences.

As the number of extreme-right-wing investigations grow, twice as many terror suspects arrested in the UK are 'White' (54%), compared to those of 'Asian' ethnicity (26%), and the proportion has been growing.

National Channel data published by the Home Office revealed that there has been a decline in overall referrals in 2020/21, with 4,915 individuals referred due to concerns that they were vulnerable to being drawn into terrorism, and 688 people received Channel support. The proportion of individuals who received Channel support due to right-wing extremism has increased steadily over the years reaching 46% in

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2020/21, up from 26% in 2015/16. A majority of individuals referred to Channel and who consented to receive support were aged 20 years or under, and male.

Key local threats continue to arise from the extreme right-wing terrorism and self-initiated terrorists (individual/s who may be inspired by the rhetoric of groups or causes across all extremist perspectives to carry out attacks). The extreme right-wing terrorism threat has increased with online space providing a major platform for this growth. Extreme right-wing groups/ influencers are likely to exploit the issue of local asylum provision in order to promote grievances, increase support and gain purchase in the city.

The risk from 'Al-Qaida' or 'Daesh' and affiliated or inspired terrorisms has continued with a rise in referrals related to this concern nationally and locally. A city resident has been prosecuted for a terrorism offence.

Increased risks are noted from accessing online materials, forums, influencers, social media, and gaming platforms from across the spectrum of extremism and ideologies. Individuals may also move from being a consumer of online content to disseminating and producing online content.

The extreme right-wing have significantly expanded their reach to young people online during Covid-19. During this period increased vulnerabilities to radicalisation have been reported with reduced protective circles around vulnerable individuals which could be exploited by groomers. Combined, these factors present long term risks.

Extremists have exploited the pandemic to spread disinformation and misinformation. Conspiracy theories have proliferated during this period. Extreme right-wing narratives are tailored to cohere with a conspiratorial worldview, such as the 'Great Replacement' or 'White genocide' and 'Great Reset'. The

narratives variously intersect with anti-establishment, anti-Semitic, Islamophobic, anti-left and anti-migrant tropes and often include call for violence.

Conspiracy theories not only fuel division but also mobilise audiences around supposed threats to society and can present a significant communications challenge. The conspiracy theories pose potential threat by engendering distrust in their audiences and encourage violence towards the government. This also demonstrates growing relationship between misinformation propagated online and terrorism/ violence (for example the Capitol Hill Riots in the USA).

Different topical themes such as Brexit, Covid-19, anti-racist protests, environmental concerns, and anti-vaccine have been used by extremist and terrorist groups of all perspectives to expand their reach into communities, promote 'victimisation narrative', raise their profile, increase their membership, radicalise and recruit. Some extremist and terrorist actors have demonstrated the degree to which they grasp the mutability of public perceptions and identify the prominence of certain issues in wider discourse to draw people into their causes.

Current context

Since 2009, the Safer Communities Team have been delivering on Prevent in the city in partnership with our communities. The city has been identified as a Prevent priority area and supported with dedicated posts and projects to mitigate strategic risks since April 2015. However, the city will no longer be a Prevent priority area after March 2022 and the financial support from the Home Office will cease. The Prevent Board will therefore need to manage and mitigate strategic risks for the city and continue to deliver on the statutory Prevent and Channel Duties from the mainstream budget.

The city will continue to receive funding to deliver the Channel Pilot where the local authority delivers on some of the functions that were previously delivered by the police. The pilot is additional to the Channel Duty on the council and is supported by a Channel Coordinator post. The number of Prevent inquiries and referrals in the city continue to remain high compared with the region and the work to safeguard individuals from being drawn into terrorism is highly regarded.

In November 2020, the revised Statutory [Channel Guidance](#) amongst other requirements, introduced a new monitoring compliance framework to improve local governance, quality assure, and increase consistency of practice by Channel Panels across the country. Each local authority is required to complete an 'Annual-Assurance Statement' signed off at the leadership level. The Home Office are empowered to provide directions to local authorities and Channel Panels for improvements, as required. The new 'Annual Assurance Statement' for the Brighton & Hove Channel Panel submitted in April 2021 received positive feedback from the Home Office. Current local Prevent delivery is aligned to the new requirements and our existing best practice needs to be sustained within reduced resources and from mainstream funding.

The national Independent Review of Prevent looked at the effectiveness of present strategies to protect vulnerable people from being drawn into terrorism and make recommendations, receiving evidence and carrying out engagements with communities in 2021. After a delay, the Prevent Review and the government response to the findings are now expected to be reported in February 2022. Partners, communities, and the Prevent Board had opportunities to engage with the Review and will need to further consider local delivery once findings are published. Local efforts to

sustain a shared understanding of Prevent with our communities will need to continue.

Our plans

We will continue to build on our existing best practice in coordinating and delivering Prevent locally and on our engagement with diverse communities and partners to mainstream Prevent work. Our annual action plan responds to all the identified strategic risks and remains flexible to respond to emerging threats and nuances identified.

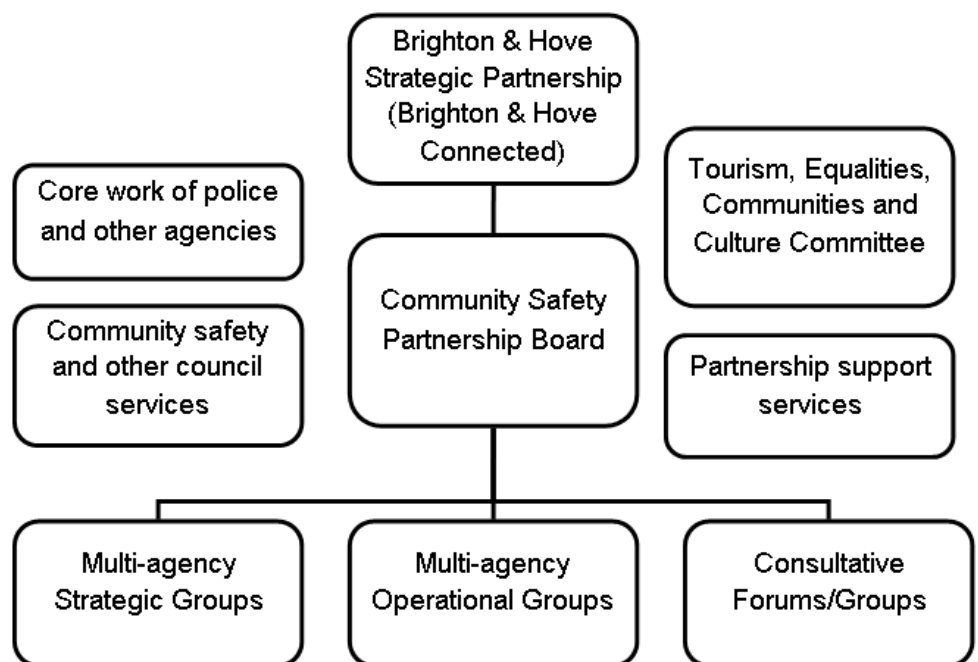
We will respond to the findings of the Independent Prevent Review and shape local Prevent delivery to continue to inspire community confidence in Prevent and continue to work in partnership with our communities. We need to plan for the implication of cessation of funding from the Home Office resulting in a reduction in resources for Prevent delivery locally and need to secure resources to deliver this work in future.

Through improved communications of Prevent work and its impact, we will improve trust and confidence amongst partners and communities. Empowered individuals and communities remain at the heart of effective Prevent delivery.

Appendix 1. About the Partnership

The Crime and Disorder Act 1998 specifies that community safety strategies must be delivered by Community Safety Partnerships. The 'responsible authorities' who are required by legislation to participate in our Community Safety Partnership are the local authority, police, probation, health, and fire and rescue services. However, many other partners from the statutory, community/voluntary and business sectors, including the Police and Crime Commissioner are fully involved in the Partnership's work. Local residents also play a key role.

The diagram shows the structure of the Community Safety Partnership. The Community Safety Partnership Board has overall responsibility for the work of the Partnership, while the individual priority areas within this strategy are supported by multi-agency working groups made up of specialists in the relevant area. In some areas there are also dedicated staff to drive forward the work.



Local Action Teams exist across the city and these are an important part of the Partnership. LATs involve residents, local businesses and agencies working together and they provide a key route through which community safety issues for local neighbourhoods are taken forward. LATs meet together via the LAT Forum where issues of common concern can be discussed and ideas shared.

The Community Safety Partnership links with the democratic process through the Tourism, Equalities, Communities and Culture Committee. Integrated working with the Sussex Police and Crime Commissioner is being achieved through having regard to each other's priorities and providing reciprocal support for delivery.

Brighton & Hove
Community Safety Partnership

Subject:		Domestic Abuse Act Strategy and Funding Award Options	
Date of Meeting:		10 March 2022	
Report of:		Executive Director Housing Neighbourhoods and Communities	
Contact Officer:	Name:	Anne Clark	Tel:
	Email:	Anne.Clark@brighton-hove.gov.uk	
Ward(s) affected:		All	

FOR GENERAL RELEASE

1: PURPOSE OF REPORT AND POLICY CONTEXT

1.1 The Domestic Abuse Act 2021 (the Act) reached Royal Assent in April 2021. Brighton and Hove City Council were awarded £606,000 New Burdens funding for the year 2021/22 to provide support for survivors and children in safe accommodation. The Tourism, Equalities, Communities & Culture Committee (TECC) considered reports relating to the funding provided by Ministry for Housing, Communities and Local Government (MHCLG) - now the Department for Levelling Up, Housing and Communities (DLUHC) during meetings in September and November 2021 where proposals for spending £606, 288 were agreed. This is set out in *appendix 1*. It should be noted that £241,000 of the original £606,000 allocation was repurposed to fund the refuge service. However, there remains a sum of £240,712 to be allocated. This report sets out further recommendations for spending this funding.

1.2 In February, the Council was notified that a further £607,996 has been allocated for 2022/23.

2: RECOMMENDATIONS

2.1. That\ Committee agrees to allocate available funding as set out in paragraphs **4.5 to 4.9 of this report.**

2.2 That Committee notes the Government allocation of £607,996 Domestic Abuse Duty funding for 2022/23.

3: CONTEXT/ BACKGROUND INFORMATION

3.1. The Act placed a requirement on local authorities to develop a local Domestic Abuse Strategy for the provision of accommodation-based support in its area. The development of the Pan-Sussex Strategy for Domestic Abuse Accommodation and

Support 2021-2024 (the Strategy) was led by the Office of the Police & Crime Commissioner and has identified strategic priorities and commitments for all TIER 1 local authorities in Sussex.

3.2. The Pan-Sussex Strategy for Domestic Abuse Accommodation and Support 2021-2024 was published in January 2022 and is underpinned by **6 strategic priorities**:

- **Consistent and Collaborative**- providing multi agency and partnership commissioning and working to ensure a consistent offer across Sussex
- **Diverse and Appropriate** – providing a wide range of appropriate and safe accommodation and support options
- **Accessible and Inclusive** – Ensuring all services are accessible to all victims/survivors and meet the specific needs of those with a full range of protected characteristics
- **Responsive to Multiple Disadvantage**- Establishing specialist provision to support victims/survivors with Multiple Complex Needs
- **Victim Centered**- Empowering victims/survivors to remain in their own home through choice
- **Trauma Informed** – Embedding trauma informed practice in practice in service and practice through training and specialist knowledge

3.3. The strategy includes several key findings relating to inconsistency and gaps in provision across Sussex. Many of the pan – Sussex gaps and inconsistencies identified for support in safe accommodation require considerable funding and require significant development including further pan- Sussex consultation and market engagement and commissioning.

3.4. In October 2021, DLUHC published its *Statutory Guidance for Delivery of support to victims of domestic abuse safe accommodation service* which clarified on what constitutes support in safe accommodation. Support includes:

- Support with day to day running of safe accommodation services
- Advocacy support
- Domestic Abuse prevention advice
- Specialist support for victims/survivors with protected characteristics
- Services specifically designed for victims/survivors with additional/complex need
- Children's Support
- Housing Related Support
- Advice service
- Counseling and therapy

4. New Proposals

4.1. This document outlines the proposals for the funds totalling £240,712. This sum constitutes the repurposed funds from the 2021/22 New Burdens funds which were allocated for the refuge contract.

4.2. It is proposed that an expanded and enhanced **Safe Accommodation Domestic Abuse Support** offer which includes **advocacy and support** is developed for those affected by DA to support them to safety, maintain their accommodation and prevent homelessness.

4.3. The proposals have been informed through a range of processes which include consideration of the DLUHC Guidance, the recommendations from the of the Pan Sussex DA Strategy and align with its strategic priorities, specifically:

- **Diverse and Appropriate** – providing a wide range of appropriate and safe accommodation and support options
- **Accessible and Inclusive** – Ensuring all services are accessible to all victims/survivors and meet the specific needs of those with a full range of protected characteristics.

4.4. The proposals seek to address needs identified by the Strategy and takes into account the revised definition of domestic abuse within the Act which includes children and young people under 16 years of age as victims in their own right.

4.5. The following table briefly outlines the proposed additional activities/spend and method of procurement that are recommended for approval.

Table 1.

	Proposed Project	Cost	Suggested Procurement Method
1	Safe Accommodation Children and Young People Domestic Abuse Pathway. This pathway consist of three elements: <ul style="list-style-type: none">• Community Programme• Safe Accommodation CYPDVA (Children and Young Person Domestic Abuse /VAWG Outreach/Caseworker-• Safe Accommodation Pilot Group work for young people using violence in personal relationships who are also at risk of losing their accommodation	£20,712. £50,000 £40,000	Invitation to Quote Invitation to Quote Invitation to Quote
2	Safe Accommodation Pathway: Domestic Abuse. Black Asian Minority Ethnic (BAME) Capacity Building Programme	£60,000	Invitation to Quote

3	Safe Accommodation LGBTQ+ Domestic Abuse Caseworker.	£40, 000	Invitation to Quote
4	Domestic Violence and Abuse Specialist Support Service (includes Independent Domestic Violence Advocacy (IDVA) Service)	£30,000	N/A
	Total	£240,712	

4.6. Safe Accommodation: Children /Young People Domestic Abuse Pathway.

The Domestic Abuse Act extended the definition of DA to include children as victims/survivors of DA. The Strategy identified a need to improve support for all those affected by DA. Support will be provided to children and young people who are affected by DA either as direct victims or as witnesses with both immediate and delayed reactions to trauma. This pathway consists of three elements:

- **Community Programme**

This programme is aimed at any family where there has been DA including those who have been in supported accommodation. It is aimed at children aged three and up and non-abusing parent. This model is based around a programme of sessions for children (divided into age groups so under 5, over 5, over 10) which run for two hours a week over a 12-week period. The age-appropriate programme will address several topics including validation of child experience/ understanding abuse/ reducing self-blame/safety planning/managing inappropriate expressions of anger. There is a concurrent group for mothers where parenting is supported around her/his experience of abuse. Referral could come from Health Visitors/school nurses/Social Services/Voluntary Sector/Education/ Services working with the non-abusing parent.

- **Safe Accommodation CYPDVA (Children and Young Person Domestic Abuse Outreach/Caseworker**

This element of the support would provide support young people aged 16 plus whose risk level is below MARAC threshold but who are affected by abuse. This worker will provide Outreach to Health Services including the Sexual Health/Reproductive Services / Young Peoples Substance Misuse Service and casework clients who require advice and support relating to domestic abuse and housing. Referral from all services and self-referrals. The post holder will also offer and deliver workshops and awareness sessions to Education Services including schools /colleges /University and provide drop-in sessions as required.

- **Safe Accommodation Pilot Group work/one to one programme for young people using violence in personal relationships**

Development of a pilot for young people s aged 11-18 who use abuse in personal relationships towards a partner or family members. The service would be offered to young people who want to change their behavior and understand their behavior, recognise their own agency and capacity to take responsibility in their relationships, identifying emotions, valuing their own emotions, identifying, and

reflecting on issues that are relevant to their family including the impact of DA, and find better ways to communicate other than abuse/violence. The offer would consist of one-to-one sessions with young person and parental support service and signposting to partner support for partner of young person.

4.7 **Safe Accommodation Pathway: Black Asian Minority Ethnic (BAME) Domestic Abuse Capacity Building Programme**

The Brighton & Hove Joint Strategic Needs Assessment (JSNA) 2021 states that 19.5% of the local population is a BAME and 1% (55,000) residents were born outside the UK. However, referrals to our MARAC (Multi Agency Risk Assessment Conference) for BAME survivors stand at 3.4% of all referrals in 2020/21. This is significantly lower than national standard when compared with the Safelives national average of 16%. This indicates there is a need to improve how we work with communities to ensure those affected by all forms of DA are aware of the support available in B&H to ensure access to support and safe accommodation for this community. The BAME Domestic Abuse Building Capacity Programme will work with existing and new community groups to deliver advice, support, training and workshops, set up referral pathways to commissioned services and deliver Outreach where required to ensure those affected by DA are aware and able to access support. This aligns with the **strategic priority of Accessible and Inclusive** – *Ensuring all services are accessible to all victims/survivors and meet the specific needs of those with a full range of protected characteristics.*

4.8 **Safe Accommodation: LGBTQ+ Domestic Abuse Casework.**

The JSNA 2021 indicates that the LGBTQ+ community accounts for 11%-15% of the population aged 16+. However, our MARAC data shows that referrals for LGBTQ+ survivors account for 8.3% of referrals which is significantly higher than the Safelives national average of 1.5%. Through the provision of a Safe Accommodation: LGBTQ+ Domestic Abuse Caseworker, we will enhance the local offer to a community who are overrepresented in the high-risk category for serious harm and through increased prevention work aim to improve access to DA support to maintain safe accommodation to prevent loss of housing. By providing support earlier it may be possible to reduce level of harm to the individuals. This aligns with the **strategic priority of Accessible and Inclusive** – *Ensuring all services are accessible to all victims/survivors and meet the specific needs of those with a full range of protected characteristics.*

4.9 **Domestic Violence and Abuse Specialist Support Service**

For a number of years Children's Services have contributed to the contract for domestic abuse services in the city. £30k of funding was recently withdrawn but continues to be part of the committed budget for the contract.

4.10 **Future Domestic Abuse Duty provision**

Committee will note that the recently announced funding allocation for 2022/23 of £607, 966 is similar to the 2021/22 allocation and it is proposed that officers report back to Committee on recommended spend in line with the DA Strategy as soon as is practicable.

5 ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

5.1 The alternative option is for Brighton and Hove to wait for pan – Sussex proposals to develop but this might be a lengthy process which would mean interventions and support for some of the most vulnerable people in the community would be further delayed.

5.2 There is clear evidence of the need for funding for proposals in this report demonstrated by the findings of the needs assessment. The Council is not able to allocate the funding to proposals for which it cannot demonstrate a need.

6. COMMUNITY ENGAGEMENT & CONSULTATION

6.1. The Strategy was widely consulted on with the public consultation running until December 2021. The needs assessment process engaged with a range of organisations. The needs assessment identified gaps in service provision and where the money should be spent to ensure that BHCC meets its duties under the new Act. The project team engaged with people with lived experience as part of the work to complete the needs assessment.

7. CONCLUSION

7.1 The Council has considered a wide range of options to meet the needs of victims and its duties under the terms of the Domestic Abuse Act. This report provides recommendations that the proposed spend meets the terms of the Act, strategic priorities of the Pan Sussex Strategy and local needs and is seeking a decision on how the award of the repurposed funds should be undertaken by officers.

8. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

8.1 The Domestic Abuse Act places local authorities under a legal obligation to provide vital support within safe accommodation to meet the needs of survivors of domestic abuse in their areas, and report back to central government that they have met these obligations. The financial implications are set out in this report and the commitments sought are in line with the funding in place.

8.2 As stated in the previous report to TECC Committee in January, it will be necessary to carry-forward the £0.241m set out in Table 1 of this report (*paragraph 4.5*) and this will be subject to P&R Committee approval in early 2022/23 as part of the council's Targeted Budget Management (TBM) Provisional Outturn report.

Finance Officer Consulted: Michael Bentley

Date: 02/03/22

Legal Implications:

- 8.3 The tendering processes outlined in this report will need to be carried out in accordance with the Council's Contract Standing Orders. The funding which is the subject of this report is Council funding and the restrictions which apply to DLUHC funding do not therefore apply. The funding which will be provided by DLUHC (£607,996) will need to be spent in accordance with the Statutory Guidance referred to in the report and in particular will need to be spent on those in 'relevant' (i.e. safe) accommodation

Lawyer Consulted: Alice Rowland

Date: 02/03/22

Equalities Implications:

Enhancing the service offer seeks to improve accessibility to services. Within both core services and any housing related offer equalities are actively considered to ensure services are available to all. It is recognised that Domestic Abuse disproportionately affects women and women with children. The findings of the needs assessment has informed the findings of Pan-Sussex Strategy for Domestic Abuse Accommodation and Support 2021-2024 which highlights equalities considerations for the region including those with other protected characteristics. A full equalities impact assessment was completed for BHCC prior to the publication of the final version of the strategy.

Sustainability Implications:

None

Appendix 1

A total spend of **£606,288** New Burdens Funding to support implementation of the Domestic Abuse Act 2021, has been agreed by Committee in 2021/22 and is detailed in Tables 2 and 3 below.

Table 2

DLUCH Support in Safe Accommodation Agreed Spend September 2021	
Reprovision of the refuge budget	£241,000
Housing Independent Domestic Violence Advocate (IDVA) This will allow those presenting as victims of domestic abuse to the housing service to be helped to access services and given support at the earliest opportunity. The needs assessment found that often survivors of domestic abuse may move out of a local authority area to a place of safety and the Act requires that those survivors are provided with ongoing support which will be provided via the Housing IDVA.	£30,000
Funding to East Sussex County Council to recruit a Community Engagement Officer to work across the Pan Sussex partnership area to set up a survivor lived experience board. This to will provide training, support briefings and debriefings to representatives for the Pan Sussex partnership board. Officers will also appoint an independent chair for the Pan Sussex Partnership board. The board is a requirement of the Act.	£32,000
Money was also allocated to RISE to continue work providing dispersed accommodation for LGBTQ clients experiencing domestic abuse. This amounted to	£99,962 until September 2022.
Interim Domestic Abuse, Sexual Violence and VAWG Commissioner	£25,000
Total	£427,962

Spend agreed by Committee in November 2021

Table 3

DLUCH Support in Safe Accommodation Agreed Spend November 2021	
Sanctuary Scheme option Funding staff salaries and £40,000 for hardware	£70,000
Floating Support Service to include: FS Move on and resettlement support to work with families and individuals as they move to independent accommodation Funding for staff salaries and management costs	£60,000
Interpreters (Increased access to interpreters and BSL)	£30,000
Flexible Fund	£18,326
Total	£178,326

Subject:	Royal Pavilion & Museums Trust Annual Report		
Date of Meeting:	10th March 2022		
Report of:	Executive Director Economy, Environment and Culture		
Contact Officer:	Name:	Mark Croston	Tel: 01273 292571
	Email:	mark.croston@brighton-hove.gov.uk	
Ward(s) affected:	All		

FOR GENERAL RELEASE

1. PURPOSE OF REPORT AND POLICY CONTEXT

- 1.1 The city council's museums service was transferred to The Royal Pavilion and Museums Trust on 1st October 2020. The museum buildings, collections and staff were transferred to this independent organisation to enable them to attract additional funding and operate on a more commercial footing.
- 1.2 The Trust are obliged to provide an annual plan and review for approval by the Tourism, Equalities, Communities and Culture Committee (TECC) each year. Attached to this report is the second plan produced during an unprecedented time for the Trust.

2. RECOMMENDATIONS:

- 2.1 That Councillors note the difficult circumstances facing the Trust as it moves forward into 2022/23 as a result of successive lockdowns and visitor restrictions over the course of the past year.
- 2.2 That Councillors approve the annual service plan for 2022/23, included as Appendix 1.

3. CONTEXT/BACKGROUND INFORMATION

- 3.1 The Policy and Resources Committee agreed to the transfer of the Royal Pavilion and Museums on 5th December 2019. It was agreed that the TECC Committee would consider an Annual Plan at the beginning of each year for the term of the services contract between the city council and the Trust.
- 3.2 The Policy and Resources Committee approved a revised financial offer to the Trust on 30th July 2020 which enabled the assets to transfer on 1st October.
- 3.3 Hedley Swain the new Chief Executive Officer assumed the role in November 2020 and since then the Trust has coped with limited trading conditions and multiple lockdowns/restrictions which continue to restrict trading and the wider work of the Trust.

- 3.4 The continuing uncertainty linked to re-opening limited the ability of the Trust to plan ahead in terms of major public events and exhibitions during 2021-22. Their programme can take many months to assemble and other institutions also had key staff on furlough, so the ability to collaborate was limited.
- 3.5 The Annual Service Plan sets out the performance of the Trust in detail, how it aligns to the council's priorities and plans for 2022/23. Additionally, performance of the Trust is measured corporately and focuses on key indicators and 2021/22 performance is summarised below. As a result of the successive lockdowns, it is sensible to compare performance with 2019/20 – the last full year of operation.
- 3.6 In 2021/22 there are 173,000 visitors projected to 31st March, which is 252,088 less than 2019/20 numbers. In 2019/20 - the last pre-pandemic year - there were 425,088 visitors. Encouragingly, visitor satisfaction levels are up from 89% to 96% in the current year.
- 3.7 There were 6,500 children and young people in formal learning engaged in the RPMT education programme, compared to 18,784 in 2019/20. With digital engagement ever more important, website sessions remained popular, with 750,000 participants in 2021/22, growing from 700,076 pre pandemic. Of course, earned income has affected all visitor attractions and in 2021/22 this is forecast at £2,200,000 compared with £4,094,569 in 2019/20. There was also a dip in Brighton & Hove residents visiting the venues, from 62,717 to 35,000.

4 Operational Management

- 4.1 Despite the pandemic, key milestones and significant achievements have taken place since the Trust's' formation. The organisation is working to ensure that the workforce are all equipped to operate within a more nimble and responsive operating model. Therefore, main business activity for 2022-23 focuses on the bedding-in of new ways of working and systems developed in 2021-22. This will include a new in-house finance and payroll service; a new website; a new fundraising team and strategy; new organisational structure; new approach to capital and programme planning; new diversity strategy and programme; new community partnerships; new learning strategy and programme; new commercial activity; new approach to managing our open spaces, implementation of a "dynamic collections" programme and a "hybrid" staff working model.
- 4.2 Despite the difficult situation, the annual service plan reflects the expectations set out in the contract with the main programmes for 2022-23 summarised in Section 3 of Appendix 1: RPMT Annual Service Plan 2022/23.
- 4.3 Officers recognise the toll the pandemic has had on museums and visitor attractions across the country. That said, the following specific goals have been achieved:
- Over £1.2m of cultural recovery funding received from Arts Council England and over £250,000 of emergency funding from the National Lottery Heritage Fund to help secure survival through COVID.

- A £390k grant from the James Henry Green Charitable Trust to deliver a “culture change” programme to ensure the service is socially engaged, diverse and equitable in all of its activities.
- A comprehensive £1.4m bid to the Museum Estate and Development Fund (MEND) grant from the Arts Council England has been submitted to address the failing Georgian roof of the Brighton Museum.
- Commencement of the Development of the Capital Campaign for the Royal Pavilion Garden, primarily funded by the National Lottery Heritage Fund (NLHF) as part of a wider masterplan for the whole Royal Pavilion Estate (including the Dome and Corn Exchange).
- Research funding of £20k into the unique collection of 17th and 18th Century Chinese wallpaper from the Paul Mellon trust which is being undertaken by expert conservators led by Amy Junker Heslip.
- Further project funding of over £75k from NLHF and the Esme Fairburn Foundation for projects at Booth and Brighton Museum.
- The Trust reached agreement on retaining key items from the Royal Collection during 2021, which were returned in early 2022. A spectacular loan from Her Majesty The Queen. The culmination of a collaborative venture between Royal Collection Trust and the Royal Pavilion & Museums, over 120 remarkable decorative works of art that were originally commissioned by the Prince Regent, have been relocated from Buckingham Palace and re-united in their previous setting of the Royal Pavilion.

4.4 Forward Planning

As the trust continue to emerge from COVID there are now opportunities to develop new partnerships and high-profile programming, that will attract existing and new audiences. Highlights for 2022/23 include a collaboration with Brighton & Hove Albion Football Club Women’s Football Team to deliver community value linked to the major summer 2022 exhibition, a major collaboration with Sussex University to contribute to a new BA degree in Liberal Arts to be hosted by Hove Museum and Misshapes: The Making of Tatty Devine at Hove Museum.

- 4.5 From March to September, The Regency Wardrobe at the Royal Pavilion has life-size costumes inspired by Regency history tell stories of seafront walking, grand balls, and musical evenings. Each unique piece is created by artist Stephanie Smart, using only paper and thread. A collaboration on Paul Weller: Cover Star will feature at Brighton Museum, April – October 2022.

5 **ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS**

- 5.1 The RPMT Annual plan for 2022/23 set out by the Trust will ensure that the services are focused on providing a modern, relevant and well-run business. A renewed focus on the digital experience will supplement the drive to grow visitor numbers and to grow earned income. The Trust will continue to optimise use of

all resources to generate income, grow footfall, further develop the reputation of Brighton & Hove and provide value for the residents of the city.

- 5.2 The Trust have laid out a forward plan for 2022/23 which their Trustees believe contributes positively to ensuring their future is secure. The alternative option is that the buildings and collections come back to the city council, which is not considered reasonable. Despite the tremendous uncertainty and financial challenges faced by RPMT it remains the case that the assets are best placed in an independent organisation which is supported by the city council.

6 COMMUNITY ENGAGEMENT & CONSULTATION

- 6.1 The focus of the Trust is on service development and driving income to reduce its financial losses and to enable longer term planning. Despite this internal focus over the course of 2022/23, as a major heritage organisation in the city, they will be an active community partner and stakeholder. RPMT include three BHCC councillors as trustees and liaise regularly with BHCC officers. Although the independent status of the trust and the advantages this brings is recognised by all, the Annual Service Plan will ensure their work is closely aligned and delivering to BHCC 2020-23 strategic plan “A Fairer City, a Sustainable future” and its outcomes.
- 6.2 RPMT recognises the importance of co-operative working, both with staff and with communities and the importance of consultation and truly listening. They will continue to support a range of community groups, representatives, and individuals, to contribute to decision making. They will continue to monitor and develop new community links to increase and improve community representation and to advise on programming and developments and key future decisions to ensure that the interests and views of a wide range of citizens are considered. Work will continue with RPMT’s existing community panels, the Access Advisory Group, the Cultural Heritage Network, and the Youth Engagement panel (Museum Collective) and with LGBTQIA communities and networks, including Queer Heritage South. This will be extended to take in a Culture Change external reference group and an internal staff culture change group. We will also see the first year the RPMT staff People and Culture group. The garden restoration project will also see a series of external consultations in 2022-23.

7. CONCLUSION

- 7.1 The Trust has faced unprecedented circumstances in terms of loss of income and closure of buildings, since the transfer of the Royal Pavilion and Museums on 1st October 2020. This second annual plan reflects the continued uncertainty faced by the Trust in relation to re-opening, likely visitor numbers and all associated areas of community and commercial activity. The plan provides the best prediction possible for the 2022-23 year at this early stage. Officers will continue to support and challenge the future direction of the Trust and its plans, building upon the progress made in the challenging environment all services have faced.

8. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 8.1 There are no direct financial implications arising from this report. The council has approved a £4.0m cash flow facility with the Trust as part of the transfer agreement to support financial resilience. In 2021 The Trust received the first drawdown of £1 million and it is anticipated this facility will be used further during 2022/23 in recognition of the ongoing financial impact of the pandemic. The agreement includes repayment of this loan facility over a ten-year period.

Finance Officer Consulted: James Hengeveld

Date: 01/02/22

Legal Implications:

- 8.2 The Services Agreement between the Council and the RPMT requires the Trust to produce an Annual Service Plan in an agreed form for approval by the Council. The Council's TECC Committee is the appropriate committee to grant this approval.

Lawyer Consulted:

Alice Rowland

Date: 28/01/22

Equalities Implications:

- 8.3 There are no specific equalities implications arising. All staff transferred from the city council to the Trust continue to be employed on pre-existing terms and conditions. Before and after transfer, large numbers of staff have been on furlough. Since the transfer the Trust have arranged staff meetings and the new CEO has sought to meet many people online, but it has not been possible to meet everyone. The further reopening of museums over the course of 2022 will enable more staff to return to regular working patterns.

Sustainability Implications:

- 8.4 The museum buildings are historic and high maintenance. They consume energy through environmental management systems and also inefficient building structures which were not designed to retain heat. However, the Trust is fully committed to environmental sustainability and doing all it can to minimise its carbon footprint. As an Arts Council England National Portfolio organisation the Trust submits a sustainability action plan annually as part of their funding agreement. Examples of work to-date include:

- A new Environmental Sustainability Policy was written for the Trust in September 2020.
- Royal Pavilion & Museums is zero waste to landfill - all non-recyclable waste is sent to the Energy Recovery Facility in Newhaven.
- A 'Green Team' of environmental champions have been appointed to encourage best practices and share ideas across the organisation.
- Energy consumption is regularly checked to identify potential issues and savings. e.g. by not turning gallery lights on until opening. This has reduced hours of lighting by up to three hours a day for some sites.
- LED lights are installed when suitable and an audit of all lighting to identify remaining opportunities is planned.

- Sustainable and organic principles are applied in the Royal Pavilion garden.
 - Consideration is given to the environmental impact when discussing overseas loans and initial research has been done into adopting carbon offsetting for loans. Consideration to be given to the requirements (and environmental impact) of current and future care when discussing potential new acquisitions.
 - The Booth Museum shop was used in 2019 as a pilot for transitioning to sustainable product ranges which the Trust aims to replicate across all retail outlets once we reopen.
 - The amount of retail stock produced in-house and by local traders to improve sustainability, environmental footprint and Fairtrade issues is being increased.
- 8.5 RPMT are aligned with BHCCs 'A Sustainable City' goal, and champion and advocate for carbon neutral policies. RPMT recognise the particular challenges that come from managing historic buildings but will develop a strategy that puts the climate emergency at the centre of our thinking and planning. They will use venues and programmes, most especially the Booth Museum of Natural History to raise awareness of climate change and the positive steps taken to combat it.
- 8.6 The Trust's revised Environmental Strategy demonstrates how they collect and monitor performance, including the carbon footprint of audiences and suppliers, it will set targets and include a series of initiatives that demonstrate sector leadership in this area:
- Use of Julie's Bicycle to monitor performance and to assess with how to engage the wider RPMT team.
 - Investigating reducing the carbon footprint for object loans.
 - Ensuring ethical and sustainable products for retail as much as possible.
 - Successful application to Esmée Fairbairn Collecting Fund for £50k to support developing public engagement and interpretation with current climate change agenda.
 - Post-Covid review of Environmental Sustainability Policy and action plan is being undertaken by the Head Gardener with plans to establish a new RPMT Green Team to champion this.

Brexit Implications:

- 8.7 There are some direct Brexit implications particularly with regards to overseas travel / visas and in particular international school visits. This continues to impact directly on admission numbers and revenues.

Any Other Significant Implications:

- 8.8 None

Crime & Disorder Implications:

- 8.9 There are no crime and disorder implications.

Risk and Opportunity Management Implications:

- 8.10 Risk and opportunity management is laid out in the RPMT Annual Plan 2022-23 provided as Appendix 1. These risks are in line with other business sensitive services provided by the council and in line with other arts council portfolio organisations across England. The return of overseas visitors is crucial yet largely uncontrollable – visitor numbers and therefore financial targets remain at risk. The estate continues to be affected by anti-social behaviour which remains a significant risk for the historic buildings and for visitors. The pandemic has required the RPMT workforce to adapt. Their Annual Service Plan describes ongoing training and investment needed to support greater adaptability and a higher level of skills in the workforce. Maintaining a full complement of experienced staff is vital.

Public Health Implications:

- 8.11 There are no Public Health implications.

Corporate / Citywide Implications:

- 8.12 Brighton and Hove is a leading UK tourism destination, and the upcoming summer season may see substantial visitor numbers for all the attractions in the city. The Royal Pavilion and Brighton Museum both successfully managed to re-open last year in a COVID-safe way, again welcoming visitors and enjoyed a reasonable summer season, supporting the local economy and the city's reputation as a major cultural destination.

SUPPORTING DOCUMENTATION

Appendices:

1. Royal Pavilion and Museums Trust Annual Plan 2022-23

Royal Pavilion & Museums Trust Annual Service Plan 2022-23

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Whenever I visit it makes me feel proud to be a resident of Brighton and Hove. We are so lucky to have such an amazing museum and art gallery. The staff are always so welcoming and informative. It doesn't matter how many times I've walked around the museum over the years, each time I manage to see it with new eyes and every time I leave with a smile on my face. On my recent visit not only was I able to see the fantastic Bowie exhibition, but the newest addition to the museum of the incredible Faberge collection.

1. Introduction

1.1. Executive Summary

We are looking forward to working with BHCC in 2022-23 and in beginning to further establish our own long-term sustainability while making a major contribution to BHCC strategic objectives and deliver to Arts Council England's (ACE) new ten-year strategy "Lets Create". Inevitably because of COVID19 this will still be a far from normal year in terms of visitor engagement and financial stability and a difficult year to plan for in advance. This will mean financial conservatism and careful managing of resources, this is particularly frustrating when, as a new organisation we need to continue a process of change and development and wish to invest in our future. Nevertheless, we present a business plan which will see us continue our ambitious journey from local authority service to independent trust and begin to experiment with new ways of working.

The Royal Pavilion and Museums Trust came into being in October 2020 with a new CEO joining in November 2020. For the vast majority of the first year (to May 2021) venues were closed, and most staff were on furlough as we struggled to stay afloat financially and develop future plans while delivering core museum services. Venues have since reopened with some return to normal working in 2021-22. However, as this plan is being written overall visitor numbers are looking to be about 60% of what would be expected in a "normal" year.

Despite the obvious obstacles, key milestones and significant achievements have taken place in since the Trusts' formation. The toll the pandemic has had on the group is recognised and despite all hurdles the following specific goals have been met:

- Over £1.2 m of cultural recovery funding received from Arts Council England and over £250k of emergency funding from the National Lottery Heritage Fund to help secure survival through COVID.
- A £390k grant from the James Henry Green Charitable Trust to deliver a "culture change" programme to ensure the service is socially engaged, diverse and equitable in all its activities. The service already has a powerful reputation for celebrating Brighton's diverse communities through projects such as "The Museum of Transology" and "Queering the Pier" and for building partnerships with the places where its collections originated, such as "Fashioning Africa".

Royal Pavilion & Museums Trust Annual Service Plan 2022-23

- A comprehensive bid to the Museum Estate and Development Fund (MEND) grant from the Arts Council England has been submitted to address the failing Georgian roof of the Brighton Museum, decision on the grant request of £1,463,769 due mid-February.
- Commencement of the Development of the Capital Campaign for the Royal Pavilion Garden, primarily funded by the National Lottery Heritage Fund (NLHF) as part of a wider masterplan for the whole Royal Pavilion Estate (including the Dome and Corn Exchange) has gone ahead.
- Research funding of £20k into our unique collection of 17th and 18th Century Chinese wallpaper from the Paul Mellon trust which is being undertaken by our expert conservators led by Amy Junker Heslip.
- Further project funding of over £75k from NLHF and the Esmée Fairburn Foundation for projects at Booth and Brighton Museum.
- New contracts to deliver two book publishing deals. One on the Royal Pavilion for the Yale University Press by curator Alexandra Loske, and a second for an edition of a SCALA publishing 'Directors Choice' book on 37 significant objects from the RPMT collections.
- Martin Pel, Curator of Fashion and Textiles has received a Headley Fellowship from the Art Fund to continue his research into the British artist Martin Battersby.
- The One Minute Experience, an app developed from an EU funded project led by the University of Copenhagen to enhance storytelling around the collection was launched in October by Kevin Bacon, our Digital lead.
- A collaboration with Brighton & Hove Albion Football Club Women's Football Team to deliver community value linked to the major summer 2022 exhibition on the history of women's football at Brighton Museum linked to Brighton being a host city for the Women's Euros.
- A major collaboration with Sussex University to contribute to a new BA degree in Liberal Arts to be hosted by Hove Museum.

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- A major programme of review and strategic planning in all aspects of the business to move from a relatively traditional local authority service to an independent trust and charitable business model has been undertaken.
- Finally, the team for the Trust is working to ensure that their 177 employees are all equipped to work to the same goal. The structure is being reframed to become nimbler and more responsive.

Given the impact of Covid on the sector the Arts Council have designated 2022-23 an extension year for existing National Portfolio Organisations. In April 2022 we will be applying to the Arts Council for renewed NPO (National Portfolio Organisation) status for the period 2023-26. Work is currently underway with Trustees, staff, and stakeholders to shape our strategy for this important funding round.

The Business Plan presented in this document covers the ACE roll-over year and acts as a bridge between the creation of the Trust, our review and restructure period, and the worst period of COVID and what will hopefully be a more stable and predictable period from 2023 onwards when we can plan more long-term for growth.

Our main business activity for 2022-23 will be the bedding-in of new ways of working and systems developed in 2021-22. This will include a new in-house finance and payroll service; a new website; a new fundraising team and strategy; new organisational structure; new approach to capital and programme planning; new diversity strategy and programme; new community partnerships; new learning strategy and programme; new commercial activity; new approach to managing our open spaces, implementation of a “dynamic collections” programme and a “hybrid” staff working model. Despite the difficult situation, we are still being ambitious in what we want to achieve and our main programmes for 2022-23 are summarised below in Section 3.

Michael Bedingfield

Chair

Hedley Swain

CEO

1.2. Governance

On 1 October 2020 management of Royal Pavilion & Museums was transferred from Brighton & Hove City Council (BHCC) to a new charity: The Royal Pavilion & Museums Trust (RPMT).

The trust manages the museums through a 25-year contract with BHCC. The Council still owns the buildings and the collections. The Trust board has 15 trustees and two young shadow trustees representing a diverse range of skills and backgrounds, trustees include three elected councillors. A representative from Arts Council England attends Trust Board meetings twice a year as an observer. BHCC's Assistant Director of Culture Tourism and Sport, part of BHCC's Directorate Economy, Environment and Culture attends all Board meetings as an observer.

Regular meeting including quarterly reviews are held with BHCC's Assistant Director of Culture Tourism and Sport and RPMT reports its annual business and development plan to the BHCC Tourism, Economy, Culture and Communities Committee (TECC).

As well as the involvement of BHCC, as a registered charity RPMT is legally obliged to publish an annual report about its finances and activities which can be downloaded from the [Charity Commission Website](#)

1.3. The Royal Pavilion & Museums Portfolio

- The Royal Pavilion (RP) (Grade 1 listed)
- The Royal Pavilion Garden (Grade 2 listed on Historic England's register of parks)
- Brighton Museum & Art Gallery (BMAG) (Grade 2 listed)
- Hove Museum & Art Gallery (HMAG)
- Booth Museum of Natural History (Grade 2 listed)
- Preston Manor (Grade 2* listed) and garden

RPMT also manages the William IV Gatehouse (Grade 1 listed), India Gate (Grade 1 listed), Northgate House (Grade 2 listed), all located on the RP estate, as well as 4/5 Pavilion Buildings, an off-site collections store in Peacehaven, the Old Courthouse and Courtroom (Grade 2 listed) and the Jaipur Gate (Grade 2 listed) at HMAG.

RPMT also operates in the virtual world through our [Website](#), and social media channels providing worldwide access to information about its rich and diverse collections, stories and resources.

Our strategic focus moving forward is to emphasise we are one team managing one palace, four museums, three gardens and an on-line presence.

2. Forward Strategic Planning

For the 2021-22 Financial year we have been operating a short-term strategic plan: Review, Reset, Relaunch. This has involved a review of all RPMT operations between January - November 2021 as we transition from a local authority service to an independent trust and charitable business. Changes resulting from reviews have been implemented incrementally with a restructure of teams starting in underway to be completed for April 2022.

2.1. Strategic Priorities 2022-23

For 2022-23 we will continue to work to our current three head-line priorities as benchmarks for a successful service with a series of sub-priorities and three meta or overarching priorities.

We will:

1. Be a brilliant museum service for the people of Brighton & Hove:

- 1.1. Be inclusive and equitable in all we do, and occasionally be unconventional and disruptive.
- 1.2. Have galleries, exhibitions, programmes, on-line content, and events that are expert, exciting, innovative, and relevant to all the people of Brighton & Hove and make their lives richer.
- 1.3. Reflect the values of Brighton & Hove and do all we can to be environmentally sustainable; to source our services locally, be ethical and socially responsible.
- 1.4. Managing our collections dynamically and looking after our collections, buildings and green spaces to the very highest standards.

2. Offer world class visitor venues:

- 2.1. Ensure as many people as possible know about our venues and as many people as possible visit them.
- 2.2. Ensure that our venues and everything that goes on in them offer great value for money, are well received and commented on, that people want to come back to them and recommend them to others.

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3. Be well run, dynamic, resilient and sustainable:

- 3.1. Be enterprising, dynamic and fleet-of-foot in looking for opportunities to build our business model.
- 3.2. Professionally manage our finances, maximising every opportunity to raise funds for the wellbeing of the service. We will work within our financial means.
- 3.3. Be receptive to all our stakeholders, most importantly Brighton & Hove City Council.
- 3.4. Have excellent staff, look after them and make sure they are diverse and reflect the population of contemporary Brighton & Hove. We will take personal and collective responsibility for what we do. We will be kind to each other and those we come into contact with.

4. Meta priorities:

- 4.1. Be excellent in everything we do and will innovate in museum practice, being part of global museum debates and supporting the museum sector regionally.
- 4.2. Have a world class reputation for excellence that enhances the position of Brighton nationally and internationally.
- 4.3. Be a listening and learning organisation. We will always seek to listen to what others have to say. We will always seek to learn from each other and others, so we become a better organisation.

2.2. BHCC Outcomes

Brighton and Hove City Council remain our most important stakeholder and partner. We have three BHCC councillors as trustees and liaise regularly with BHCC officers. Although the independent status of the trust and the advantages this brings is recognised by all we wish to ensure our work is closely aligned and delivering to BHCC 2020-23 strategic plan “A Fairer City, a Sustainable future” and its outcomes:

2.2.1 A City to Call Home

RPMT will help make Brighton & Hove somewhere where people want to live and where they value the place they live. We will actively contribute to local debates and ensure all our venues and activities are welcoming and accessible to all residents.

2.2.2 A City working for All

RPMT will continue to make a major contribution to the visitor economy in Brighton and Hove. We will do this through our venues offering high quality visitor experiences that are well marketed, but also by contributing to the overall strategic

planning, partnering with other organisations. RPMT's five venues and three gardens are already firmly embedded in the local Brighton and Hove Community. We will further emphasise this with our exhibitions and programmes for example Goal Power (timed to coincide with the 2022 Women's Euros football tournament, Brighton is one of the hosts cities) which will celebrate the place of women's football in local community life. We will use the location of our venues in residential parts of Brighton & Hove to work more with local people and families close to where they live.

We will be a centre of excellence for museum, heritage and culture skills and wherever we can recruit locally and help develop local skills. We will contribute to innovation in the city, particularly with digital skills and their use in museums.

2.2.3 A Stronger City

Our Culture Change programme will involve wider groups from the local community in our creative work. We will also build on our past track record of involving different communities on our creative process. This will involve our "Museum Mentors" group for young neuro-diverse people, continuing partnership with Queer Heritage South, and the Cultural Heritage Network group of BME community members. We will ensure RPMT is anti-racist, socially engaged and equitable in all that it does.

2.2.4 A Growing & Learning City

We will continue to grow our on-line presence and deliver more high-quality on-line content.

Following a detailed review in 2021, 2022-23 will be the first full year of a new comprehensive learning offer for RPMT. This will be aimed at making maximum benefit of all our five sites, linking them to the national curriculum and local audiences.

We will also put new emphasis on individual creativity and making. This will be focused on HMAG, already the home for our craft galleries. We intend to trial a new programme of creativity aimed at younger people using our historic cinematography collections and partnering local organisation Video Club.

We will also develop further our partnerships in Greater Brighton and across Sussex and are building a relationship with the University of Sussex and their new Liberal art degree programme connected to Hove Museum and our equalities workstream.

2.2.5 A Sustainable City

RPMT will align itself with BHCC and champion and advocate for carbon neutral policies. We recognise the challenges that come from managing historic buildings but will develop a strategy that puts the climate emergency at the centre of our thinking and planning. We will use our venues and programmes, most especially the Booth Museum of natural History to raise awareness of climate change and the positive steps that can be taken to combat it. Our revised Environmental strategy will not only demonstrate how we collect and monitor our own performance, including the carbon footprint of our audiences and suppliers, it will set targets and include a series of initiatives that demonstrate sector leadership in this area. We also commit to use our buildings , collections and displays to highlight conversations in relation to environmental policy.

2.2.6 A Healthy & Caring City

We recognise the value museums and heritage can bring to health and wellbeing agendas and work hard to reach out to those most in need and develop programmes to support them. We will use our gardens to welcome more users and maximise their positive use.

2.3. ACE Let's Create

As an Arts Council National Portfolio Organisation RPMT is committed to delivering on ACE's new ten-year strategy "Let's Create" with its three outcomes:

- Creative people
- Cultural communities
- A creative and cultural country

And four investment principles:

- Ambition and quality
- Inclusivity and relevance
- Dynamism
- Environmental responsibility

Our Business Plan 2022-23 therefore aligns with theses outcomes and investment principles.

3. Annual Service Plan 2022-23

Stakeholder Outcomes Key

BHCC Outcomes		ACE Investment Principals	
A City to Call Home	BH1	Ambition & Quality	AQ
A City Working for All	BH2	Dynamism	D
A Stronger City	BH3	Environmental Sustainability	ES
A Growing & Learning City	BH4	Inclusivity & Relevance	IR
A Sustainable City	BH5		
A Healthy & Caring City	BH6		

Priority 1 Be a brilliant museum service for the people of Brighton & Hove:

Programme strand		Activity	ACE BHCC Outcomes	RPMT strategic Priority	Lead
1.A	Ongoing safe operation of sites for audiences following Covid closures	<ul style="list-style-type: none"> Maintain safe operation of sites Review of opening hours to optimise visitor numbers & financial resilience Respond to Covid safety requirements as required through regular Covid review meetings <p>Measures: Visitor number targets for each venue achieved, visitor feedback</p>	AQ & IR BH 1,2,3,4 & 6	All	EB
1.B	Delivering first full year of the Culture Change RPMT programme and working	<ul style="list-style-type: none"> Recruitment to 2 x posts (Curator – Inclusive Collections & Head of Diversity & Inclusion) Continued support for Black History Month by hosting events 	IR BH 2, 3 & 6	All	EB

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	with BHCC on their Our Legacy project. Continuing to diversify governance. Continuing work with Museum Mentors, Heritage Network and others.	<ul style="list-style-type: none"> Continued support with JHGT for a Change Studentship programme in partnership with the University of Brighton to support BAME applicants for the MA Curating Collections & Heritage course. With the support of the JHGT we are funding an international studentship at the University of Leicester with one of our partners, an Assistant Curator from the Khama III Memorial Museum in Serowe, Botswana. <p>Measures: Appointment of 2 x new staff posts, continuing support for studentship programmes.</p>			
1.C	First full year of new cradle to grave learning offer with particular emphasis on primary years.	<ul style="list-style-type: none"> Ongoing consultation of the Teacher Ambassador group to ensure peer review and relevance of learning work Review and refine Early Years offer New and refreshed primary school KS1 & 2 sessions, new session on palaeontologist Mary Anning, refreshed History Mystery session now featuring Sake Dean Mohammed, reconfigured Royal Pavilion visit. Develop relationships with secondary schools in B&H and with teachers decolonising group Offer enrichment support to the holiday activities for children in receipt of free school meals Develop working relationship with East Sussex College Partnership developed with University of Sussex Liberal Arts degree at Hove Museum Ongoing support to University of Brighton MA in Galleries and Heritage. Programme of talks online and in person) – adult audience <p>Measures: Children & YP visits, numbers engaged, income, satisfaction</p>	AQ & IR BH 2,3 & 4	1.1,1.2, 2.1,3.1, 3.4	CE

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1.D	Delivering new exhibitions programme including Goal Power, Ballet de Porcelaine, Tatty Devine, Heritage Open Days Museum Collective take over).	<ul style="list-style-type: none"> • Marilyn Stafford: A Life in Photography - 26 February – 8 May 2022 BMAG • Misshapes: The Making of Tatty Devine - Hove Museum - 10 March – 4 September 2022. • The Regency Wardrobe at the Royal Pavilion - 19 March – 11 September 2022 • Paul Weller: Cover Star - Brighton Museum, 26 April – 30 October 2022 • Goal Power! Women's Football 1895 – 2022 - Brighton Museum - 18 June – 25 September 2022 - • Aubrey Beardsley: A Brighton Boy - Brighton Museum - 30 July – 30 November 2022 <p>Measures: Audience nos, satisfaction, programme quality measured against IIT</p>	AQ & IR BH 1, 2, 4 & 6	1.1, 1.2, 2.2, 3.1, 3.2	CE
1.E	Delivering new events programme including Ballet de Porcelaine, Heritage Open Days Museum Collective take over.	<ul style="list-style-type: none"> • Ballet Porcelaine June 22 • Dream, Think Speak May-June 22 Part of Brighton Festival • Escape Rooms @ Preston Manor October half term, December • Heritage Open Days – 9-18 September 22 • Christmas at the Royal Pavilion • Exhibition related programmes – Regency Wardrobe, Goal Power, Marilyn Stafford, Tatty Devine, • Telling tales and talking trails: empowering our volunteers as digital storytellers (NLHF funded bring you own device project) at BMAG and Preston Manor • Discovering our Dioramas – project funded by Esmee Fairburn Foundation Collection Fund - to engage audiences with the Booth Museum collections and contemporary environmental concerns <p>Measures: Audience nos, satisfaction, programme quality measured against IIT</p>	AQ, & IR BH 1, 2, 4 & 6	1.1, 1.2, 2.2, 3.1, 3.2	CE

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1.F	Planning future programming, eg Ballet 33, Lee Miller fashion, ABBA anniversary of performing in Brighton.	<ul style="list-style-type: none"> 2023 200th Anniversary of completion of the Royal Pavilion & 150th Anniversary opening of Brighton Museum Ballet 33 (dates TBC) Natural History Photographer of the Year (Dates TBC) Lee Miller Fashion Spring 2023 ABBA 2024 <p>Measures: Funds secured, exhibition outline approved internally. Contracts agreed, loans negotiated</p>	AQ, & IR BH 1,2, 4 & 6	1.1, 1.2, 2.2, 3.1, 3.2	CE
1.G	Planning to tour Bowie exhibition	<ul style="list-style-type: none"> Scope tour content Market to potential venues & contract <p>Measures: Contracts agreed, tour income</p>	AQ, D BH 1	2.1, 2.2, 3.1,	CE
1.H	A new emphasis for Hove Museum as a centre for individual and group creativity.	<ul style="list-style-type: none"> Develop partnerships with local cultural organisations and universities. Partnership with Video Club and Corridor in external grant bid for engagement project exploring early filmmaking in Hove Explore potential for pop up food events Programme of events in connection with the Tatty Devine exhibition Partnership with University of Sussex Liberal Arts degree programme <p>Measures: Audience numbers, satisfaction, programme quality measured against IIT</p>	AQ, IR BH 1, 2, 3, 4 & 6	1.1, 1.2 2.2, 3.1, 3.3, 3.4	CE
1.I	New emphasis on building audiences at Preston Manor, Booth and Hove.	<ul style="list-style-type: none"> Telling Tales and Talking Trails bring your own device interpretation trail at Preston Manor Escape Room at Preston Manor – October half term and Christmas season 22 Discovering our Dioramas – engaging audiences with the Booth Museum collections and contemporary environmental concerns 	AQ, IR BH 1, 2, 3, 4 & 6	1.1, 1.2 2.2, 3.1, 3.3, 3.4	CE

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		Measures: Audience numbers, satisfaction, programme quality measured against IIT			
1.J	Building partnerships with key local stakeholders for future strategic planning (Universities, marketing, digital & tourism).	<ul style="list-style-type: none"> • Ongoing relationship University of Sussex • Ongoing relationship University of Brighton • Joint programmes and collaborative working BDBF • Partnership working with tourism partners DEG, Visit Brighton, Sussex Modern • Digital partners including Wired Sussex & Cog App Measures: Visitor numbers, participation numbers, income	AQ & IR BH1, 2 & 3	1.1, 1.2 2.2, 3.1, 3.3, 3.4	EB
1.K	Building and delivering new community programme and partnerships (including with creative partners including: Queer Heritage South, Outside In, Video Club, University of Sussex and community partners including: NHS, BHCC, CHOMP and others).	<ul style="list-style-type: none"> • Offer enrichment support to the holiday activities for children in receipt of free school meals with CHOMP • Develop follow on project from Queer the Pier with Queer Heritage South • Build on partnership with University of Sussex Liberal Arts at Hove Museum and broaden wider links with the university • Develop funding bid in conjunction with Video Club and Corrido for project at Hove Museum • Discovering our Dioramas community engagement with collections at the Booth Museum • Telling tales and talking trails: empowering our volunteers as digital storytellers (NLHF funded bring you own device project) at BMAG and Preston Manor Measures: Participation numbers, satisfaction, programme quality measured against IIT	AQ & IR BH 1,2,3 4 & 6	1.1, 1.2 2.1, 3.1, 3.3, 3.4	CE
1.L	Finalising and implementing a long-term plan for capital renewals	<ul style="list-style-type: none"> • Appointment of new Buildings Manager role and amalgamation of this role into the existing facilities team to create a joined-up approach to buildings maintenance. 	AQ & ER BH 2 & 5	1.1, 1.2, 1.3, 2.2,	CT

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	and maintenance for all buildings and open spaces.	<ul style="list-style-type: none"> To work with BHCC partners and existing consultants to create long-term plan for planned buildings maintenance and capital renewals. To review all revised Fire Risk Assessments and Fire and Security Strategies to feed into the long-term planning for our buildings. <p>Measures: A forward plan for buildings maintenance and capital renewals will be produced which will incorporate fire and security upgrades, revised fire and security strategies for our buildings will have been produced.</p>		3.1, 3.2, 3.3	
1.M	Two new major publications with Yale and Scala.	<ul style="list-style-type: none"> Agreement with Yale University Press to begin research and writing to produce a new book on the Royal Pavilion (written by Alexandra Loske). To provide content for a SCALA book publication showcasing 37 highlights of our collections. <p>Measures: Ongoing research and writing for the Yale book, content delivered for SCALA publication.</p>	AQ BH 4	2.1, 3.1	CT
1.N	Delivering Dynamic Collections programme.	<ul style="list-style-type: none"> To continue processing acquisitions and disposals to the collection. To develop a multi-year project plan to review all collections and storage. <p>Measures: acquisitions and disposals to the collection will be ongoing, a project plan will have been created to outline the process of maintaining sustainable collections and individual collection reviews.</p>	AQ & ER BH 2 & 5	1.4, 3.1, 3.2	CT
1.O	Achieve new Accreditation Standard	<ul style="list-style-type: none"> To submit all paperwork required to receive full Museums Accreditation March 22 and maintain standards. <p>Measures: full Accreditation to be granted to RPMT Summer 22</p>	D, AQ, IR, ER BH All	1.2, 1.4, 3.3	CT

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1.P	Ongoing Collections & Conservation programmes	<ul style="list-style-type: none"> Continue essential documentation work to all collections e.g. completing the acquisition process, documentation, labelling and storage of the Fashioning Africa collection. Continue environmental monitoring, preventative conservation plans and mould management relating to our collections and buildings. Continued remedial conservation work e.g. Royal Pavilion wallpaper, restoration of pagodas <p>Measures: Improvements to collections documentation on Mimsy, maintaining required conservation care standards</p>	AQ BH2 & 5,	1.2, 1.4, 3.3	CT
1.Q	Specific research projects to increase understanding of the collection	<ul style="list-style-type: none"> Chinese Wallpaper in Royal Pavilion: Led by Amy Junker-Heslip this research project is to undertake academic research of the only set of wallpapers not removed from the Royal Pavilion by Queen Victoria when she sold it in 1850. The wallpapers are an important example of this phase of British style which also reflects trends in international trade and cultural exchange. The project will enable visitors to better access and engage with this paper through wider digital interpretation (online talks, blogs, ability to scroll through images and zoom in and improvement of onsite interpretation). Martin Battersby research: Led by Martin Pel this research project will fully document the objects that have a connection to Martin Battersby, an important benefactor to our collections. Royal Pavilion book: Led by Alexandra Loske this research project will look at the Royal Pavilion in the context of the time of its creation and development under royal ownership, from its beginning in the wake of the French Revolution, through its transformation and extension during and just after the Napoleonic Wars, to its fate and legacy in the early Victorian era. Esmee Fairbairn grant: Led by an internal team of staff this project will review the way we currently tell the story of the bird dioramas located in the 	AQ BH 2 & 4	1.2, 1.4, 3.3	CT

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		<p>Booth Museum as well as engaging with visitors about the creation of a new contemporary diorama to reflect modern Brighton.</p> <p>Measures: increased understanding of our buildings, interiors and collections, improved visitor engagement with our stories.</p>			
1.R	Implementation of new volunteer policies and programme	<ul style="list-style-type: none"> • Implement new volunteer agreements to ensure compliance with legal requirements • Deliver Telling tales and talking trails: empowering our volunteers as digital storytellers (NLHF funded bring you own device project) at BMAG and Preston Manor – recruit digital volunteers • Develop a digital volunteer's pilot programme with help of Wikimedia UK • Develop suite of new and reconfigured volunteering opportunities across RPMT • Volunteer gardener programme at the Pavilion Estate and Preston Manor • Garden Greeters volunteer summer scheme at Pavilion estate • Support volunteering requirements of the Pavilion Garden stage 1 NLHF grant <p>Measures: Volunteer hours, satisfaction, programme quality</p>	AQ, D, IR BH All	1.1, 3.1, 3.3, 3.4	CE
1 S	Implementation of Digital strategy to develop virtual offer	<ul style="list-style-type: none"> • Delivery of Digital Projects e.g., Telling Tales and Talking Trails bring your own device interpretation trail at Preston Manor • Continue to make collections and resources accessible online • Launch of new website May 2022 • Improved E commerce capability <p>Measures: website sessions, social media engagement, income</p>	AQ, IR, ER & D BH All	1.1, 1.2, 1.3, 2.1, 3.1	AT

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Priority 2 Offering world class visitor venues

Programme strand		Activity	ACE BHCC Outcomes	RPMT strategic Priority	Lead
2.A	Experimenting with more experiential and immersive visits to Royal Pavilion.	<ul style="list-style-type: none"> • Redisplay of Royal Pavilion following removal of Royal Loans • Regency Wardrobe • Development of BYOD tours to multiple languages • Scope major reinterpretation project, exhibitions, interventions & events programmes consulting with stakeholders • Adelaide wallpaper display • Christmas at the Royal Pavilion • Refine offer for group markets 23-36 <p>Measures Visitor numbers, satisfaction, Income, assessments against IIT framework</p>	AQ, IR, D BH 1,2,3	1.1, 1.2, 1.4, 2.1, 2.2, 3.1, 3.2, 3.3	AT
2.B	Deliver Phase 1 of our Royal Pavilion Garden project and an integrated approach to all our open spaces.	<ul style="list-style-type: none"> • To have engaged the wider Project Team to deliver the Development Phase of the project. • The Project Team will undertake development planning to submit a delivery phase application to NLHF in 2023. <p>Measures: Project Team appointed, planning to have been progressed, consultation to have been completed.</p>	AQ & ER		CT
2.C	First year of new audience research and data collection and management.	<ul style="list-style-type: none"> • Effective & timely reporting • Qualitative data collected to demonstrate delivery against Investment principals • Data informed project planning, project assessment and decision making 	D		AT

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		Measures: Meet ACE, & BHCC reporting requirements, KPIs effectively monitored, effective project delivery			
2.D	Continuation of marketing initiatives and campaigns aimed at local, regional, national and international audiences	<ul style="list-style-type: none"> • Implement revised pricing structure to ensure income targets including Gift Aid & membership are achieved • Marketing & PR strategies across all sites to maximise income based on effective use of audience segmentation data • Marketing of commercial services to maximise income for Enterprises • Implementation of CRM system to effectively drive repeat business • Implementation of groups & travel trade strategy • Implementation of digital marketing strategy • Partnership working with venues and destination marketing organisations at local regional and national level <p>Measures: Visitor numbers, Income, campaign awareness, press coverage satisfaction data</p>	D, AQ, IR BH 1,2,3	1.1, 1.2, 1.3, 2.1, 2.2, 3.1, 3.2	AT

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Priority 3 Be well run, dynamic, resilient and sustainable:					
Programme strand		Activity & Performance Measures	ACE BHCC Outcomes	RPMT Priority	Lead
3.A	Deliver agreed Southeast Museum Development Programme	<ul style="list-style-type: none"> Deliver Museum Development Programme meeting ACE Quarterly reporting requirements Work with MDO East to develop submission for MDO funding for MDO role 23-26 – Outcome known Dec 22 <p>Measures: Successful MDO programme, MDO funding 2023-26 achieved</p>	AQ, D, ER & IR BH	3.2, 3.3, 4.2	HS
3.B	Ensure RPMT fulfils its sector leadership role locally, regionally, and nationally	<ul style="list-style-type: none"> Continue to contribute to sector conferences and publications Ongoing representation on National Museum Directors Council <p>Measures: sector press profile, publications and conferences contributed to</p>	AQ, IR, D & ER BH all	All	EB
3.C	Carefully managing finances and evolving our business model.	<ul style="list-style-type: none"> Meet on going requirements for F&GP Monthly review of Mgt Accounts and budget forecasts Ensure ROI factored into and monitored on all projects and initiatives Ensure budget holders manage budgets to agreed financial procedures <p>Measures: Budgets achieved</p>	D	3.2	EB
3.D	First full year of in-house IRIS finance and payroll.	<ul style="list-style-type: none"> Successful closedown of accounts in Iris April 22 Shadow Payroll run April 22 Go-live on payroll May 22 Roll out of Iris Training to budget holders April – May 22 Roll out of Payroll approval training May 22 Ongoing contract Management 	D	3.2	AT

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		Measures: timely & accurate finance reporting, accurate monthly payroll			
3.E	Compliance with statutory and financial regulations	<ul style="list-style-type: none"> Audit of 2021-22 accounts July 2022 Returns to Charity Commission (RPMT, Foundation, Toy, Preston & Booth Charities Jan 23 Enterprise accounts lodged with Companies House Feb 23 Regular returns to ONS Measures: returns made to deadline	D & IR BH 2	3.2	AT
3.F	Continuing organisational change from LA service to independent charity – embedding organisational and cultural change, – 1 team, 1 strategy, 5 venues, 3 gardens, 1 website.	<ul style="list-style-type: none"> Embed new structures Recruitment to key new roles Probationary reviews, training and performance Management framework used to ensure staff working effectively to revised JDS and delivering to Organisational plan Measures: Staff satisfaction, effective project delivery, income and visitor targets achieved	AQ, IR, D, ER BH all	3.2, 3.4	EB
3G	Development of current and future workforce to deliver the business model and ensure diversity and inclusion:	<ul style="list-style-type: none"> Training & Development framework implemented suitable for charitable trust Review of policies to ensure equality of opportunity and inclusion for all current and future staff Implementation of programmes to provide more accessible recruitment and development opportunities e.g., apprenticeship programme Measures: staff satisfaction, workforce protected characteristics stats	D, IP BH 2	3.4	
3.H	Delivery of first full year of new HR policies and organisational culture including hybrid working	<ul style="list-style-type: none"> Policies in place to manage staff effectively Staff benefits package offered Office spaces reconfigured Ongoing liaison with Unions People & Culture group Measures Staff satisfaction	D, IP BH 2	3.4	EB

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3.I	Maintain ICT infrastructure to support a well-run, dynamic, resilient, and sustainable service	<ul style="list-style-type: none"> Minimal downtime across entire estate Achieve Cyber security accreditation Manage our data securely Customer facing infrastructure operates smoothly to enable engagement and income generation Effective third-party contract management <p>Measures: minimal downtime, value for money on contracts secure network & data compliance</p>	AQ, IR, D, ER BH All	All	AT
3.J	Continue to innovate digitally to improve business systems and drive income and engagement	<ul style="list-style-type: none"> Ongoing refinement of web offer post go live - May 22 Sourcing & implementation of CRM Interim improvements to ticketing capability Ongoing refinement of Shopify Ongoing monitoring of all web platforms Development of 5G testbed project <p>Measures: Systems updated, web sessions, income</p>	D & AQ BH All	All	AT
3.K	Delivery of new brand and brand architecture	<ul style="list-style-type: none"> Brand development completed April/May 2022 Ongoing updating of assets across estates/ web/ print Application for Product licencing projects <p>Measures: Brand recognition, Assets updated</p>	D BH1 & 3	All	EB
3.L	Operate retail services via RPMT Enterprises to deliver target turnover of £800,000	<ul style="list-style-type: none"> New staff in role Merchandising & Buying manager, Buying Assistant, e-commerce manager, Stock room assistant Ongoing merchandising plans for sites and temporary displays Development of appropriate bespoke products Effective stock control including quarterly spot checks and annual sock take Diversifying range of product for sale online tying into campaigns Continue to work with agencies to commercially licence product based on Pavilion interiors <p>Measures: Income, SPV, ATV, Online metrics,</p>	AQ, ER, D BH3 & 5	3.1, 3.2	AT

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3.M	Operate commercial services via RPMT Enterprises including weddings & events & filming & photography & commercial rentals to deliver target turnover of £350-400,000	<ul style="list-style-type: none"> New staff roles appointed – Head of Income generation, e commerce manager, Head of Marketing & Communications Implement year 1 recommendations of wedding & events reviews including Investment in WIV caterer's kitchen Develop hosted event offer banquets, escape rooms, opera dinners etc Appointment of new events caterers Investment in promotion of RPMT as a venue for commercial filming & photography Review of commercial rental opportunities including Courthouse, gatehouse, 4/5 tea co space Scoping of viability of retail catering offer for 2023 including pop up catering opportunities across sites Final year of current contract for Ice rink review & tender for future periods <p>Measures: Income, event attendance</p>	AQ, ER, D BH3	3.1, 3.2	AT
3N	Develop and roll out an environmental sustainability strategy	<ul style="list-style-type: none"> Ongoing monitoring of energy consumption Switching energy supply to 100% renewables Monitoring volume of goods purchased locally Continued ethical sourcing of retail goods for resale Development of internal framework to evaluate projects contribution to environmental impact reduction Engagement and public programmes 5G testbed partnership working to improve building management systems <p>Measures: Energy & water usage, % products purchased within BH postcode, biodiversity in green spaces,</p>	ER BH5	1.3	EB
3.O	Achieve NPO Funding 2023 -26	<ul style="list-style-type: none"> Bid Submitted April 2022 Outcome Autumn 2023 Business Plans submitted March 23 <p>Measures: Funding maintained</p>	AQ, IR, D, ER BH All	All	EB

4. Resourcing the Plan

As an independent museum service heavily reliant on external commercial and visitor income our business model has been seriously compromised by the COVID pandemic. However, we have constructed a financial model for 2022-23 to deliver our business plan based on sound income and expenditure predictions and supported by our reserves and an as needed a loan facility form BHCC. We are in the process of finalising the transfer of our finance systems from BHCC in-house to give us greater financial control. Our finances are monitored monthly by the Executive Board and quarterly by our Trustee Finance and general Purposes Committee.

4.1. Outline budget for 2022-23

The summary outline budget for 2022-23 is shown below with a full outline budget included as Appendix 3. The budget includes current projections for 2021-22.

2021-22 has been a challenging year as although all venues are now open key markets including international visitors, travel trade and groups are not expected to return until Spring 2022. In addition, although schools and event audiences are returning numbers are much lower than pre pandemic levels. The budget to 2022-23 demonstrates an improved position on the assumption that admissions and secondary spend will return to 65% pre pandemic levels for the year.

Income	Projected Outturn 2021/22	Budget 2022/23
ACE - NPO	724,214	737,249
ACE - CRF	413,000	-
NLHF	-	30,000
BHCC - Service Fee	1,362,000	1,300,000
BHCC Garden	18,000	18,000
Gift Aid & Exhibition Tax Relief	76,500	200,000
Admissions	1,504,000	2,607,758
Tour Fees	15,000	35,000

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Schools Learning	22,925	45,000
Membership/Patrons	80,000	120,000
On site donations	20,000	50,000
Garden Donation	6,500	6,500
Legacies	30,000	30,900
Corporate Giving	-	15,000
Fundraising	41,000	214,000
Misc	89,200	16,000
JH Green Restricted	80,000	80,000
Museum Development Restricted	521,026	521,026
Trading Activities	795,750	996,743
TOTAL INCOME	5,799,115	7,023,176

Expenditure	Budget 2021/22	Budget 2022/23
Wages and Salaries	4,492,420	4,184,533
Premises Related	727,924	788,139
Transport Related	12,080	12,322
Other Supplies and Services	1,191,088	1,140,067
Cost of JH Green Restricted	80,000	80,000
Cost of Museum Development Restricted	521,026	521,026
Cost of Trading Activities	335,211	565,653
TOTAL EXPENDITURE	7,359,749	7,291,740

BALANCE B/F	2,886,450	1,325,816
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SURPLUS/(DEFICIT)	(1,560,634)	(268,564)
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4.2. Reserve Position

The final budget position for 2021-22 will be a £1.5m deficit for the Group; total income for the year at circa £5.9m with a total expenditure budget for the year of circa £7.5m.

At the end of the year the Group's reserve position is currently projected to be £816K and cash position £1.3m. However, after deducting Endowment, Restricted and Designated Funds, only £488k of the projected cash balances would be unrestricted.

An additional £1 million drawdown of the previously agreed BHCC has been requested to increase our unrestricted cash position to c. £1.5m in line with the Trust's unrestricted reserve policy and to provide a working cashflow to take into 2022-3. The agreed terms of the loan are that amounts should be repaid by 2030. It is our current expectation that 2022-23 will continue to be a recovery year. The Trust has now reviewed all areas of its business, a re-organisation is currently underway which once implemented will focus on developing commercial and fundraising income streams. This coupled with a gradual return to numbers approaching pre-covid levels will provide a more resilient business model in the longer term. We would then plan to expand the business from 2023-24. We would therefore currently expect to make repayments on the loan from 2023-24 to 2029-30 with repayment amounts rising each year as the business developed.

4.3. Fees & Charges 2022-23

Fees & Charges were taken to the RPMT Main Board on 28 January 2022 and agreed as part of the 2022-23 budget setting process. Charges are a key component of our budget setting process. Earned income accounts for between 50-60% of our organisational running costs. Our proposed Fees and Charges for the coming year are laid out in Appendix 1.

4.4. Maintenance & Capital Projects

RPMT manages five important public buildings, three historic gardens and a series of workspaces. RPMT recognises that as an independent museums service it is important that there is a strong management plan in place to maintain and care for these buildings. To achieve this, we have developed a five-year plan for external capital repairs with a series of one-year interim plans. In addition, we have developed a 20-year capital renewals programme for all our sites, outlining a prioritised and costed schedule of works for building maintenance. In addition to this we are in the process of reviewing all policies and procedures relating to

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environmental control, health and safety, fire safety and security practices to incorporate any required changes in these areas into our programme.

£534,867 has been invested by BHCC in capital works during 2021-22. At the end of May 2021 repair and maintenance work was completed to the north end of the Royal Pavilion. This was undertaken by the contractors DBR and featured in the TV series 'Heritage Rescue'. Repair and maintenance work has also been carried out to the gates on the India Gate, as well as the William IV gatehouse on the Pavilion Estate. Repairs have included lighting upgrades, redecoration of the main historic gates, as well as structural repairs to the roof and roof lights. We have continued with our ongoing monthly roof and gutter clearance contractor with a local contractor to reduce the likelihood of water ingress into our buildings.

Brighton Museum & Art Gallery has also received internal repairs to some of our gutters. During the summer of 2021 we heard that we had been successful in our Expression of Interest submission to Arts Council England for the MEND fund to support with urgent repairs to the museum roof. We have worked with the contractor McConville to complete measured surveys for the main gallery roof repairs, particularly in relation to repairs to the historic glazed roof, and in October 2021 we have submitted a bid for funding to enable this work. We are waiting to hear if our final submission has been successful which is expected to be known in February 2022.

Preston Manor has also benefitted from repair and maintenance work to the internal gutters along with the pond and flint walls in the garden. We have also undertaken quinquennial survey of Preston Manor this year with will be a great help in informing and prioritising our future planned maintenance work to this building.

At Hove Museum and Art Gallery extensive repairs were carried out to the front façade in 2021. This work includes repairs to the stonework as well as timber repairs to windows and doors.

Work is planned to take place at the Booth Museum of Natural History at the beginning of 2022 where the staff offices and kitchens at the front of the building will be refurbished.

5. KPIs, Evidence & Monitoring

5.1. KPIs

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RPMT reports quarterly on the following key performance indicators to its Executive & Board. These indicators have been chosen to map to RPMT priorities and provide measurable targets for success. The first 6 indicators form part of our formal agreement with BHCC for contract delivery.

	BHCC Indicator	Target 22/23	Expected 21/22	Baseline 19/20
1	Visitors to the Royal Pavilion & Museums	295,000	173,000	425,088
2	Satisfaction levels of visitors to the Royal Pavilion & Museums	95%	95%	89%
3	Children & Young People participating in formal education	13,000	6,500	18,784
4	Website sessions	780,000	750,000	700,076
5	Earned income - Trust & Enterprise combined	£3,700,000	£1,900,000	£4,094,569
6	No. of B&H residents visiting the Royal Pavilion & Museums	50,000	35,000	62,717
	Other KPIs Monitored	Target 22/23	Expected 21/22	Baseline 19/20
7	Community Engagement - all events, all ages	15,000	5,500	30,229
8	Social Media - Engagement	180,000	150,000	N/A
9	Number of volunteer hours	15,000	1,200	24,260
10	Number of new members	500	350	474
11	Number of new patrons	28	18	18
12	Staff publications	5	3	5
13	Staff pulse survey - I feel valued by RPMT	45%	40%	N/A
14	Governance diversity - protected characteristics	40%	40%	N/A
15	Staff diversity - protected characteristics	35%	32%	N/A
16	Environmental - energy consumption (kWh)	2,390,000	2,409,197	2,409,197
17	Environmental - water consumption (cub mtrs)	5,600	5,700	5,893
18	Environmental - recycling (litres)	235,000	231,000	231,000
19	Environmental - % spend withing BN postcode	40%	U/K	N/A

5.2. Data Collection and Qualitative Assessment and Evaluation

Our programme will be monitored quarterly by the Executive team. Papers including budget reports, risk analysis and delivery reports will be presented to Trustees at Finance & Governance Board, Main Board and our Enterprise Board which has specific responsibility for monitoring the delivery of targets for RPMT Enterprises our Trading Company. Both of our key funders BHCC and ACE have representation on our main Board of Trustees. Our NPO reports will be approved at Board level and once approved there, they are then sent to our Arts Council Relationship Manager, via Grantium, to release the ACE payment.

Data will be captured against the SMART targets every quarter to allow for timely monitoring of the programme. Impact of activities are collected through a range of methods including:

- Ongoing visitor surveys using post visit email questionnaires and/or Digivey onsite feedback mechanisms
- Online surveys to collect feedback on the online experiences
- Mosaic and Audience Spectrum Postcode analysis
- Ongoing analysis of demographics of Staff, Trustees and Visitors
- Staff pulse surveys
- Visitor Attraction Quality Assurance Scheme (VAQAS)
- Advisory groups & Community Panels
- Access Audits
- Project and event specific data collection with partners, community participants and visitors
- Admissions data
- In-depth qualitative research to evaluate specific projects, designed to fit the given project and its participants most appropriately
- Arts Council England Insight and Impact Toolkit

6. Risk Register

The RPMT's risk register is reviewed monthly by the Executive Board and quarterly by the Finance and General Purposes Committee of the Trust. The activities developed to deliver the plan will also be shaped by this understanding of the organisational and external context, (Appendix 1).

7. 2020 - 2021 In Review

7.1. Individual Sites

7.1.1 Royal Pavilion

- The Royal Pavilion reopened on 17 May 2021 with the Royal Loan remaining in situ. Over the course of the summer visitor numbers averaged about 50% of pre pandemic levels due to the absence of the group and international visitor market. A major marketing campaign funded via ACE Culture recovery fund grant however helped boost visitors from the South East and London. During Qtr3 visitors had risen to rising to 70% pre pandemic levels.
- In late June-July the Pavilion closed for a period of 16 days for filming. The interiors were transformed into a Russian palace for the Amazon TV series The Great Season 2.
- Events have gradually returned in the Pavilion over the autumn months including lectures, tours and study days for members a series of fundraising evenings to develop the patron base of the Royal Pavilion & Museums Trust and our popular Christmas banquets.
- Christmas returned to the Pavilion for the first time in two years with the interiors dressed for Christmas. Glittering trees, gorgeous Georgian Christmas deserts, flickering candles and green garlands all welcomed Christmas visitors to the Royal Pavilion. A new trail invited children to search for the Royal Pavilion mice as they celebrated their own Christmas in miniature style around the palace.
- The Ice rink also returned after a year of absence due to Covid. This year a new visitor route was created through the garden and additional feature lighting funded from the Welcome Back Fund was installed to link the Christmas market in Valley Gardens to North Street.
- The Royal Pavilion then closed in January for annual maintenance and the decant of the works from the Royal Collection which will eventually be returning to the restored rooms at Buckingham Palace.

7.1.2 Royal Pavilion Garden

The “A Garden Fit for A King” project, funded by the National Lottery Heritage Fund (NLHF), is underway. The NLHF were supportive of extending the timescales for the project due to the impact of Covid-19 and the move to Trust. The Project Board has been established and the Project Manager’s appointed (Focus Consulting). The Project Team is currently being recruited to and will include a landscape design team, management and maintenance planning consultants, activity, interpretation, and evaluation consultants as well as some fixed term staff roles to help support research and fundraising.

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This team will lead on the phase one grant received from NHLF which will focus on the development of the project which is currently due for completion in March 2023. The primary purpose of the project is to ensure that the Royal Pavilion gardens are removed from the Heritage At risk Register and that we have a plan on how to preserve one of the most important Regency landscapes in the country. The project will also implement improves access and learning opportunities as well as increasing volunteering opportunities in this space.

7.1.3 Brighton Museum and Art Gallery

- Several exhibitions within BMAG were extended as they had opened just before the first Covid lockdown.
- Brighton Museum reopened to visitors on May 18th with an extended run (to 23 January 2022) of the temporary exhibition “Rock n Roll With Me: Bowie/MacCormack 1973-6” It showcased photographs taken on tour by David Bowie’s close friend Geoff MacCormack between 1973-76, covering Ziggy Stardust, Aladdin Sane and the Diamond Dogs’ tour across the USA, Japan and the UK via Russia on the Trans-Siberian Express to Bowie’s first major film The Man Who Fell to Earth, and the recording of Station to Station. Demand for tickets has remained high with many days selling out. We have had very positive feedback from visitors to the exhibition. Galleries and other shops in Brighton have responded by stocking Bowie merchandise.
- BMAG also has a display in the Prints & Drawings gallery on Designing an Enchanted Palace: The Crace decorators at the Royal Pavilion until 17 April 2022. The Crace family were interior designers for George IV at the Royal Pavilion.
- Down from London: Spencer Gore & Friends, display in the Fine Art gallery showcasing the Spencer Gore acquisition until 11 September 2022
- Queer the Pier, community curated exhibition with explored peers into local LGBTIQ+ history has been extended until March 2023 to ensure maximum exposure for their work
- Five newly discovered Fabergé pieces went on show at Brighton Museum in November 2021 after being identified last year by Geoffrey Munn of the Antiques Roadshow
- School visits restarted in September 2021, with many town children having their first every school trip to one of our sites
- 700 Museum Takeaway bags were distributed to children in the summer and Christmas holidays, filled with simple activities to replace the touch interactive which had to be removed for Covid safety.

7.1.4 The Booth

- The Booth Museum reopened on Saturday 31st July after 16 months of closure. Visitors were greeted with a newly decorated entrance lobby and a refurbished shop.

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- An important recent discovery, a fragment from a Azhdarchid Pterosaur jaw was identified by Roy Smith from Portsmouth University in 2020 and is likely a new species, but too small to officially base a new species on. The fragment went on display with a replica skeleton 3D printed from one of the fossils discovered by nineteenth century palaeographer Mary Anning, complementing our new school's session on her.
- The second new display featured objects chosen Dr Rachel White from the University of Brighton and champion of Brighton & Hove's participation in City Nature Challenge; and Michael Blencowe – Head of Community Action with the Sussex Wildlife Trust.
- For October half term we added a colourful new children's trail featuring 'fun facts' about various animals presented by Orlando the Owl and scattered throughout the museum to be discovered on your visit.
- In January 2021 the Booth Museum was successful in attracting a £50,000 grant from the Esmée Fairbairn Collections Fund, run by the Museums Association. The *Discover our Dioramas* grant will support a community project to create a new museum diorama inspired by the public's love of birds and wildlife, that will provide scientific information for future generations. The project will start in April 2022.

7.1.5 Preston Manor

- Preston Manor reopened to visitors' 28 May, with prior retraining of front-of-house staff to familiarise them with the one-way Covid safe visitor route as well as the details and enhanced invigilation requirements of the newly introduced exhibition. 'Lost Masterpieces' displayed two oil paintings, *Mary Magdalene* by Francesco Trevisani and *Balthazar* by Joos Van Cleve, which featured in the BBC Four series 'Britain's Lost Masterpieces' in early 2021.
- Fordcombe CofE Primary School (Tunbridge Wells) was the first school to visit the Manor on 30th September, after 18 months of lockdowns, and were the first to experience the revised Key Stage 2 role play scenario.
- Halloween 2021: Youtuber Jack Manifold (1.98m subscribers) visited in October to record a Halloween special. The video has so far attracted over 1.75m views.
- The house, and the display closed to the public for the season on 18th October 2021, and Pier Pressure Escape Rooms running for half term and late November until Christmas over 2,100 attended the escape rooms.

7.1.6 Hove Museum

- Hove Museum reopened to the public on 26th July 2021 following internal decoration and repairs. The building underwent significant external repair over the summer.
- The new exhibition was *Richard Slee: Mantlepiece Observations*, contemporary ceramics by a leading artist in the field, inspired by the first ever Mass Observation report, the archive of which is now housed at The Keep.
- Autumn 2021 Hove Museum entered into a partnership with the new Liberal Arts undergraduate degree course of the University of Sussex. Across the term students worked to project briefs investigating needs of museum stakeholder groups. The new degree was launched at an event at Hove Museum. The students will be undertaking some work at Booth Museum in Spring term 2022.

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- During February half term 2022 Hove Museum hosts the Days of Wonder, a partnership between RPMT, Screen Archive South East, Corridor and Videoclub. Three days of activities celebrate the Hove-based early pioneers of cinema in a pilot for a larger project.
- *Misshapes: the Making of Tatty Devine* will open at Hove Museum on 5 March 2022, featuring over 100 pieces from the last 20 years of the jewellery company's collections along with sketchbooks, films and associated ephemera. A programme of workshops, talks and lectures will accompany the exhibition. RPMT's retail team are working with Tatty Devine on creating pieces of their trademark acrylic jewellery inspired by the Royal Pavilion.

7.2. Visitor Services, Enterprises & Business Operations

7.2.1 Digital

April 2021- Dec 2022: Website sessions = 742,257 Social media engagements = 144,870

Digital growth has been outstripping pre pandemic levels throughout 2021-22. More individual engagements are made with RPMT online rather than in person whether that be following social media leads, purchasing from our online shop, looking at our collections, downloading resources or engaging with some of our website content. Key highlights of the year include:

- Launch of new online shop: <https://shop.brightonmuseums.org.uk/>
- New online interpretation of Chinese wallpaper in Royal Pavilion: <https://brightonmuseums.org.uk/royalpavilion/history/chinese-wallpaper/>
- Public test of One Minute app in Brighton Museum: <https://brightonmuseums.org.uk/brighton/trails/one-minute-app/>. Will inform roll-out as part of visitor offer in second half of 2022.
- Awarded £27k from NLHF Skills for Future programme for new digital volunteering programme launching in April 2022.
- New virtual tour of Royal Pavilion enabling remote access and encouraging fundraising: <https://brightonmuseums.org.uk/royalpavilion/virtual-tour/>
- Roll out of a multi-language bring your own device Royal Pavilion Tour to replace audio guides.
- Commenced work on redeveloping main website, launching in late spring 2022

7.2.2 Marketing & Press

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- A major Marketing Campaign ran across the summer in print and advertising, this included station advertising 80km radius of Brighton.
- With funding from the ACE Cultural recovery fund investment was also made in digital advertising campaign working with a digital agency.
- The organisation has continued to enjoy high profile press and media coverage including a regular nostalgia piece in Brighton & Hove Independent, an Interview by our Curator of Natural Sciences for on the Tree Pangolin with Lauren Laverne for Radio 6 music, an interview with Peter James by Angela Rippon in the Banqueting Room for The One Show, sector press contributions to the debate around the return of Benin bronzes to Nigeria and local regional and National media around our post covid reopening and exhibitions, particularly David Bowie.
- A major piece of work undertaken in summer on audience segmentation looking at audience profiles from both within the City and in general to inform Audience Development planning.
- A major rebranding exercise is currently underway with a new visual identity due for launch in May 2022.

7.2.3 Enterprise

Commercial activity for the Royal Pavilion & Museums Trust is run through RPMT Enterprises Ltd. This includes Commercial filming and photography, weddings and venue hire, retail, catering, and property rental:

- The team have been heavily involved with commercial filming and photography projects during the year ranging from small shoots to a major TV series. Those featured include Cotton Traders, Deaths Dorr Tattoo, Heritage Rescue Grace Tv series, The Great, an Amazon series, The Rug Company and various news broadcasts.
- Wedding business has slowly returned over the last twelve months and the team have continued to provide excellent service to their couples negotiating the ever-changing requirements of Covid.
- Corporate events business has not returned although we are beginning to see some bookings and 2,000 visitors attended Mystery at the Manor and A Christmas Carol Escape rooms hosted jointly with Pier Pressure and Preston Manor.
- 273 guests attended Christmas banquets over 3 Fridays in December generating a profit of £12,700. and several successful fundraising events were held.
- Retail has performed better than expected despite the low footfall. In December a new online shop was launched selling many of our bespoke ranges [Royal Pavilion & Museums online shop](#).
- Future catering opportunities are still to be decided. A major commercial review has suggested opportunities for commercial gain from retail catering are marginal especially given current low footfall, the existing local market and level of investment needed in kitchens.

7.2.4 Finance

- A new finance team has been recruited over the course of the last twelve months.
- The trust undertook its first full audit and audited accounts for The Royal Pavilion & Museums Trust, RPMT Enterprises Ltd and the former fundraising charity, the Royal Pavilion & Museums Foundation Ltd have all been filed.
- Since it was established, the trust has operated its financial services via a contract with BHCC through the Council's Business Operations team. Although helpful for the initial transition it has not been without its challenges in terms of providing timely management information and charity appropriate reporting.
- As a result, the Trust has now procured a stand-alone finance system and transferred on 1 Feb 2022.

7.3. Collections & Conservation

7.3.1 Loans, Acquisitions & Deaccessions

Currently we have 39 active loans. Most of them are for exhibitions, some for research. We have objects on loan from nearly all our collections (Costume, Dec Art, Fine Art, Local History & Archaeology, Natural Sciences and World Art) and several loans have gone to overseas venues. Below is a selection:

- 144 objects to Khama III Memorial Museum Botswana – including clothing, weapons, bags, tools, and ornaments.
- A head carving of a Maori ancestor, the leader and chief Hongi Hika, to Te Kōngahu Museum, New Zealand.
- Seven costumes to the Guildhall Art Gallery.
- Alice in Wonderland by George Dunlop Leslie, oil painting, to the V&A. In February the exhibition, including this work, will travel to for venues in Asia: Chaoyang Joy City (with UCCA), Beijing; Mori Arts Centre, Tokyo; Abeno Harukas Museum, Osaka and Hangaram Art Museum, Seoul.
- Two Walter Sickert paintings, The Laundry Shop, Dieppe and Portrait of The Honourable Lady Fry to the Walker Art Gallery.
- Two circus-themed ceramics and a painting, The Ballet Shoe, by Laura Knight to the MK Gallery.
- Beata Beatrix, After Rossetti, to Casa Cavazzini, Udine.
- The Amber Cup will be going on loan to the British Museum in February 2022 for the exhibition the World of Stonehenge.

Long-term loans

- A kitchen unit back to Embassy Court, Brighton.
- Four objects relating to Magnus Volk to Volk's Electric Railway Association, Brighton.

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- 118 archaeological artifacts to Saddlescombe Farm.
- High Weald Roman Coin Hoard to Fisbourne Museum.
- 23 geological objects to Horsham Museum.
- Sir John Soane table to Stowe House.

Acquisitions

- Small mahogany three-cornered bracket cupboard (original Royal Pavilion furniture) - (donation) April 2021. One barkcloth facemask made by barkcloth by Samoan artist Reggie Fitiao - (gift) -July 2021.
- Eight contemporary objects from Botswana: baskets, spoon, giraffe sculpture, leg rattles and currency - (purchase - James Henry Green fund) July 2021.
- 16mm film Mirror Films by Steve Farrer - (donation - presented by the Art Fund) September 2021.
- HD digital file Domestic Sanitation by Helen Chadwick - (purchased as part of the Art Fund New Collection Award 2015) September 2021.
- Film/HD file Antepartum by Mary Kelly- Donation- presented by the Contemporary Art Society) September 2021.
- Partially albino woodcock mounted specimen - (donation) October 2021.

Deaccessions

- Two volks railway model sections and cars transferred to Volks Electric Railway Association) - May 2021.
- Eight items of furniture - two sofas, washstand, dressing table, wardrobe, sofa table, shelving unit, bed and furnishing transferred to Dudley Museum Service - November 2021.
- Fire engine, fire pump and extinguisher, with documents transferred to Amberley Museum Trust - December 2021.

7.3.2 Conservation

The team have undertaken their core tasks including collections care and housekeeping tasks, facilitating loans, and supporting the RPMT events programme including functions and filming projects. The team have continued managing our environmental controls. In particular this year they have been monitoring and managing pest issues at the Booth Museum in relation to the stored taxidermy, along with mould outbreaks at the Royal Pavilion, Preston Manor and Hove Museum & Art Gallery. Improvements have also been made to light control measures and UV protection in some key rooms in the Royal Pavilion. They have also supported with monitoring for water ingress and have been working to commission the Gutter Watch system in the Royal Pavilion to help with this.

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Some specific projects that the team have been working on have included planning the removal and deinstallation of the Royal loans and the reinstallation of our own collections, continuing the silver gilt programme of cleaning at the Royal Pavilion, started the pagoda conservation project, removed varnish from the Chinese wallpaper and redecorated the lift lobby and south end of the Great Kitchen at the Royal Pavilion. The team have also played a key role in planning and facilitating collection reviews at our off-site store.

The technician team have continued supporting RPMT with general maintenance support along with installing exhibitions and displays across our sites. Specific projects that they have completed this year include devising display and lighting solutions for all exhibitions at Brighton Museum & Art Gallery, Preston Manor and Hove Museum & Art Gallery. They have also re-suited all the locks at the Royal Pavilion.

7.3.3 Gardens & Facilities

RPMT has engaged a new Head Gardener who leads the outdoor team. The garden team is now responsible for not only the Royal Pavilion Garden, but also those at Preston Manor and Hove Museum & Art Gallery. Over the last 12 months the primary aim of the gardening team has been to keep the three gardens well-maintained and to continue good relationships with our existing volunteer teams. Our Head Gardener is compiling a wider vision for our outdoor spaces as well as a plan of priority work. The Garden Apprentice continues to be a success and we are keen to build on this by continuing our engagement with this scheme and looking to expand on it.

The Facilities team has continued managing our annual maintenance programmes e.g., PAT testing, servicing of systems, as well as overseeing our Health & Safety work including being key players in our ongoing response to Covid. Additional priorities for the team have been reviewing our fire and security procedures including undertaking independent Fire Risk Assessments for all our main buildings. They have also led on a Space Review which is an initiative to undertake a review of all our spaces to make better use of the space available to us. The first part of this process has been a consultation with staff about the use of our behind-the-scenes spaces and looking at how we can use our hybrid working policy to reduce our required office spaces, which in turn will create areas for us to better store our archives and collections or to use for income generation. This review dovetails into our other organisational priority of a dynamic collections review – part of which is to review where we house our stored collections and developing ideas of how to improve this.

7.4. Engagement & Programming

Most staff were furloughed, or part furloughed from October 2020 to end of July 2021, so programming, learning and community engagement restarted in the autumn of 2021 following a period of preparation.

7.4.1 Learning Schools and Early Years

- Early years and formal schools learning activities resumed in the autumn term 2021 following suspension since the first lockdown. Taught sessions were refreshed and improved, and staff were retrained.
- A review of our school offer focused on our flagship sessions, working with our Teacher Ambassadors advisory group to ensure that these sessions meet the needs of schools, improve quality, and increase impact, and can be run as efficiently and cost effectively as possible.
- Schools are working on a recovery curriculum, and we have offered them high quality, meaningful and enjoyable visits, with strong uptake in paid sessions especially Ancient Egyptian Mummification, Victorian Servants, Brighton in the Stone Age, and Local History. Due to covid limitations school visits are lower than in previous years but bookings exceeded our initial predictions. We welcomed 4,599 school children to our sites in the first term.
- Early years provision restarted in summer holidays with an enrichment programme for children in receipt of school meals with CHOMP (project supported by BHCC). 9 sessions reached 89 children and 46 adults, with a further October half term programme reaching 35 children and 12 adults.
- Museum Takeaways bags were introduced at BMAG – put in place due to the removal of hands-on interactives for covid safety. 700 bags were given away with very positive visitor feedback, a longer dwell time in galleries and giving children a focus for their visit.
- RPMT commissioned an external consultant to work with us to review the Learning offer across all our sites, from Early Years, Families, Schools, FE, HE and Adult Learning. This review identified strengths, gaps, and improvements to our offer over the coming 5 years and informed our new Learning strategy.

7.4.2 Community Engagement

Community engagement work was affected by the pandemic with in-person work restarting in the autumn, with some provision provided earlier in the year virtually through online meetings and events:

- The Museum Collective (young people's group 14-25) programmed in person activity for the national Heritage Open Days on the theme of 'Edible England' at Preston Manor, organising garden tours, craft workshops, a food bank collection point, working with a sound artist to produce a sound installation and created their own zine for visitors. Potential new volunteer roles for long-standing members of the collective are being developed as the member age beyond to group's age group.

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- The Young Carers group took part in a Halloween animation project with Remix the Museum, at Preston Manor.
- Support continued for the Heritage Network (Black history organisation). 2 members have worked with RPMT attending a series of national workshops with Museums across the UK exploring potential solutions to the difficult issues around many collections including decolonisation.
- Working with Arts & Homelessness International and Accumulate (the art school for the homeless), led to creation activity packs inspired by the Bowie exhibition that went out across the UK to 20 hostels to support homeless people's wellbeing during the covid lockdowns, including Phase One Brighton, whose staff were supported to participate in training & hostel residents enabled to attend remote creative sessions led by the Barbican, Autograph, The Justice Museum & Museum of Youth Culture.
- Queer the Pier exhibition was extended into 2023 due to covid closures. Since lifting of lockdowns talks & tours of Covid safe smaller groups, including Universities of Brighton and Sussex, Older & Out, led by volunteer Community curators & RPMT staff have taken place. Events are planned up to Feb 2023 including 2022 LGBTIQ+ month (February). QTP was highlighted as part of national Heritage Open Days, focusing on RPMT's inclusive approach to exhibition planning & curation.
- Content has been contributed to an Alzheimer's & dementia activity / communication tool App through the My House of Memories
- January to September monthly Postal Service packs were provided to 30 members of Museum Mentors, with some telephone support. In summer a display of their work Echoes of Leisure went up and an Open Day was held at Hove Museum. In person activity resumed in October supporting 33 members at Hove & Brighton.
- RPMT is currently reviewing its volunteer programmes, including looking at our offers for apprenticeships, student, and work experience placements. This review is likely to be completed in the Spring of 2022 and will inform future volunteer programmes for the service. Across the year, RPMT has seen 34 volunteers give 1,747 hours to the service. Areas of work have included Conservation, Programming, Gardening, Garden Greeting and Community Engagement. RPMT have 102 registered volunteers who are still keen to work with us.

7.4.3 Events Programme 2021-22

- An experimental programme of 17 online talks covering a range of topics and times ran from April 2021, delivered by a range of people including RPMT and guest curators, conservators, external subject specialists, artists, community contacts and front of house staff.
- In person events were limited due to covid but did include Glitter and Glitz at BMAG in Sep 2021 a "cos-play" event for fans to come to the 'Bowie/MacCormack: Rock 'n' Roll with Me' exhibition in their best Bowie-inspired costume. 40 participants.
- Hove Museum held Children's Art-Crafty workshops in October half term with 16 attendees and a Creative Writing for Adults session in November with 10 attendees. Numbers were consciously limited for covid precautions.

7.4.4 Exhibitions 2021-22

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Brighton Museum exhibitions and displays 2021 – 22

- Bowie / MacCormack Rock 'n' Roll With Me 1973-76 - until 23 January 2022
- Designing an Enchanted Palace: The Crace decorators at the Royal Pavilion - until 17 April 2022
- Down from London: Spencer Gore & Friends - until 11 September 2022
- Queer the Pier - until February 2023
- Finding Fabergé - 2 November 2021 – June 2022

Royal Pavilion exhibitions and display 2021 – 22

- A Prince's Treasure - From Buckingham Palace to the Royal Pavilion.
- Christmas at the Royal Pavilion - 20 November 2021 – 2 January 2022.

Forthcoming exhibitions

- **Marilyn Stafford: A Life in Photography - 26 February – 8 May 2022 BMAG** - a Retrospective exhibition of photographer who captured both fashion and celebrity portraits, as well as work that bears witness to the lives of those living in war and poverty.
- **Misshapes: The Making of Tatty Devine - Hove Museum - 10 March – 4 September 2022.** The story of pioneering jewellers Tatty Devine who challenged conventions and working creatively with laser cut acrylic built an international brand. A Crafts Council exhibition.
- **The Regency Wardrobe at the Royal Pavilion - 19 March – 11 September 2022** - At the Royal Pavilion this spring and summer life-size costumes inspired by Regency history tell stories of seafront walking, grand balls, and musical evenings. Each unique piece is created by artist Stephanie Smart, using only paper and thread.
- **Paul Weller: Cover Star - Brighton Museum, 26 April – 30 October 2022** - Iconic magazine and music press covers from around the world celebrate the Modfather and his amazing forty-five-year career. Presented in association with About The Young Idea.
- **Goal Power! Women's Football 1895 – 2022 - Brighton Museum - 18 June – 25 September 2022** - This is more than an exhibition; this is a call for action. Stories of resistance, perseverance, but above all a love for football that means they have trailblazed the way for women and girls today. 2022 Women's European Football Championship is hosted in the UK (6-31 July 2022), Brighton & Hove is one of nine host cities. Goal Power has received funding as part of the FA led NHLF bid to create heritage activity for the Fan Zone in Brighton. Also funded by NHLF RPMT is working with a targeted group of young players to use the stories of Goal Power! to build confidence and skills. Brighton & Hove Albion are working with RPMT on a series of community activations. Hope

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Powell and Victoria Williams are lending objects and sharing their stories as part of the exhibition. Goal Power! has featured in a WSL match programme and on the Albion website. We are also working on an event programme with Albion in the Community.

- **Aubrey Beardsley: A Brighton Boy - Brighton Museum - 30 July – 30 November 2022** - exploring the life and work of Aubrey Beardsley, marking the 150th anniversary of his birth in Brighton on 21 August 1872.

7.5. Inclusivity and Relevance

The core mechanism by which we will deliver on this principle during 2022-23 will be the Culture Change RPMT programme. This was introduced in the 2021-2 business plan. It has now been finalised and launched.

Building on the long-standing investment of the James Henry Green Charitable Trust (JHGT) in a socially engaged and progressive museum practice and by work undertaken by RPMT in partnership with a range of partners and communities, Culture Change will seek to embed, extend, and amplify this work so that it becomes a core operational principle and deliver to our strategic aims. As a major regional museum service with iconic and historic buildings, collections of international importance and which is embedded in its community, RPMT can make an important and distinctive contribution to the sector's efforts in this area, as well as to the lives and experiences of its staff, partners, and publics.

Where previously activity in this field has been undertaken on a project-by-project basis, by different departments and individuals, Culture Change will draw together our staff, our buildings and collections, our resources, our communities, and strategic partners to promote holistic organisational change. As a whole-organisation initiative this work will involve:

Publicly publishing our ambitions against deliverable, measurable targets (with identified resourcing) and reporting on this at pre-agreed intervals.

Building critical friendships and strategic partnerships to inform and provide rigour and accountability for our work (this will include working with a specially formed oversight group to ensure transparency, as well as scrutiny of our practice against our ambitions).

- Undertake a programme of organisation-wide training and development so that all staff are skilled and invested in an anti-racist and socially-just practice.

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- Investing in key staff appointments and ensuring that these roles are developed, framed, and advertised in ways which ensure a diverse recruitment field. Also continuing to develop initiatives which promote career development in both formal and informal ways.
- Continuing to support the University of Brighton's Change Studentship (fees waiver) attached to the MA Curating Collections & Heritage course to promote diversity within the wider museum/heritage sector workforce.
- Ringfencing budget to ensure that diverse voices can contribute to our planning, strategy-setting, activity delivery, monitoring and evaluation and be paid a professional fee for their work and expertise.
- Researching the histories of our buildings and collections so that we can reflect on the legacies of these and develop strategic initiatives in response (including, for example, sharing collections inventories with countries of origin, developing new interpretation, writing a returns policy).
- Reviewing our policies and practices to ensure they reflect our commitment to an anti-racist and socially-just ethos.
- Continue to monitor the makeup of our staff, trustees and visitors and continue to seek as opportunity arises to further diversify our staff and trustees.

As well as undertaking greater scrutiny of our collections, our working practices, and policies, and developing structures and mechanisms for ensuring greater organisational equity, Culture Change will also seek to recognise and celebrate the achievements of our communities in the past and the present. We will look for opportunities to do so in every aspect of our work, and across all our sites. A major focus and outcome for the ways of working described above will be the longer-term re-development of the central gallery at BMAG which will draw on the richness of our collections and the diverse experiences of our communities to present compelling new narratives which excite, engage, and resonate with our audiences in and beyond the museum.

In terms of ongoing work, The Queer the Pier exhibition at Brighton Museum, the culmination of two year of work with and by Brighton-based LGBTQI+ volunteers were revamped for COVID safety having been open for two weeks prior to the first lockdown.

Our Museum Collective (14–25-year-olds) were selected as one of nine groups supported by Heritage Open Day's New Wave development programme, resulting in MC taking over RPMT's delivery of this year's Heritage Open Day programming,

celebrating the Edible England theme at Preston Manor in a very different way to most places, including a sound installation, zines, crafting and a poison plant event.

We have undertaken a baseline demographic survey of our staff and trustees and will repeat this process annually to chart progress. We have already started the process of diversifying our board of trustees recruiting one new trustee and two shadow young trustees.

7.6. Communities & Partnerships

RPMT recognises the importance of co-operative working, both with staff and with communities and the importance of consultation and truly listening. To this end we do and will continue to support a range of community groups, representatives, and individuals, to contribute to decision making. RPMT will continue to monitor and develop new community links to increase and improve community representation and to advise on programming and developments and key future decisions to ensure that the interests and views of a wide range of citizens are considered. Work will continue with RPMT's existing community panels, the Access Advisory Group, the Cultural Heritage Network, and the Youth Engagement panel (Museum Collective) and with LGBTQIA communities and networks, including Queer Heritage South. This will be extended to take in a Culture Change external reference group and an internal staff culture change group. We will also see the first year of our own RPMT staff People and Culture group. Our RP Garden project will also see a series of external consultations. We have started working more closely with a range of other Brighton based organisations including the Brighton Dome and Festival, Outside In, and Video Club.

7.7. Our Staff

Our greatest asset is our staff. RPMT currently employs about 177 FTE staff. The staff teams include visitor service staff, curators, conservators, technicians, historic building management, security, learning and community engagement, creative programming, marketing, retail, events and function management, development and fundraising, digital and ICT, finance and HR. Our people have had to endure the COVID pandemic, dealing with personal and professional challenges. For much of 2020 and about half of 2021 many staff were on furlough or working remotely or in relatively remote circumstances. We have slowly returned to normal in the later part of 2021 before some restrictions were reintroduced. We are very grateful to staff for their stoicism and adaptability during this difficult period.

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We have also seen the change from a local authority where our staff were part of a much larger organisation to an independent trust with the need for everyone to adapt to a new working culture. We undertook a series of reviews during the first part of 2021 and in later 2021 instigated an organisational restructure focused around four needs:

1. To create an organisational structure for a successful independent business and charity to succeed (one that can raise more income and be more commercial in outlook and deliver on its museum programming priorities to the highest standard).
2. Make sure we are a single team all focused on our core vision and mission (looking after our five venues and three gardens).
3. Simplify and unify our structures (as few role types and departments as possible, simpler more logical lines of reporting and accountability).
4. To make savings.

Consultation on the plans begun in mid-November and are expected to be complete at the end of January. The proposal involves removing 34 existing posts and creating 34 new posts (effecting c. 17% of staff) while achieving c. £300k of savings.

We have also taken advantage of the need to work remotely through COVID to adopt a flexible working model for staff which is seeing us move to “hot desking” and occasional home working. The aim is to improve work life balance for staff while also improving work culture and freeing up space that might bring in additional revenue to the trust.

Our HR and Finance teams are also introducing new practices as part of the process of change. We are grateful to the support BHCC has provided for us but as from February 2022 we will move to an independent financial management arrangement and from May 2022 we will also adopt an independent payroll service.

7.8. Environmental Sustainability

The trust is fully committed to environmental sustainability and doing all it can to minimise its carbon footprint. This is enshrined in our working strategy for the future, and we will undertake a review of our working in summer 2021. As an Arts Council England National portfolio organisation, we submit a sustainability action plan annually as part of our funding agreement. However, as noted we fully appreciate that we are responsible for a series of historic buildings that were not

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built with environmental sustainability in mind and have not been invested in overtime to improve this situation. Examples of work to-date include:

- A new [Environmental Sustainability Policy](#) is currently in progress.
- Royal Pavilion & Museums is zero waste to landfill - all non-recyclable waste is sent to the Energy Recovery Facility in Newhaven.
- A 'Green Team' of environmental champions have been appointed across teams to encourage best practices and share ideas across the organisation.
- Energy consumption is regularly checked to identify potential issues and savings. e.g., by not turning gallery lights on until opening we have reduced hours lighting per day by up to three hours a day in some sites.
- LED lights are installed when suitable and an audit of all lighting to identify remaining opportunities is planned.
- 100% recycled paper is used and reduced print runs for any marketing to avoid waste.
- We have Successfully trialled card-based graphics, text panels and labels.
- We continue to follow sustainable and organic principles in the Royal Pavilion Garden.
- Exhibitions and displays are designed to re-use up to 50% of existing set & staging stock.
- Consideration is given to the environmental impact when discussing overseas loans and initial research has been done into adopting carbon offsetting for loans. Consideration to be given to the requirements (and environmental impact) of current and future care when discussing potential new acquisitions.
- The Booth Museum shop was used in 2019 as a pilot for transitioning to sustainable product ranges which we aim to replicate across all retail outlets once we reopen.
- The amount of retail stock produced in-house and by local traders to improve sustainability, environmental footprint and Fairtrade issues is being increased.

7.9. South East Museum Development

RPMT delivers the regional museum development programme (SEMDP) funded by Arts Council England. This provides professional museum development advice across the region. RPMT providing the service demonstrates our commitment to the wider sector and is an endorsement of our leadership skills. The service has been fully operational throughout the COVID crisis (i.e., working remotely, no furloughing) and have recruited an Equality, Diversity, and Inclusion consultant, Isilda Almeida, to help shape programming for 2021-23. A summary of the services provided is listed here:

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- **Training:** Between 1 October – 30 November, we ran 8 free virtual training events (23 events since April 2020; 398 participants). Topics include: Marketing, Fundraising, Preventive Conservation, Audience Engagement, and Income Generation.
- **Grants:** Since April 2020, SEMDP ran four COVID-response grant schemes to support museums across the South East of England. 70 grants have been issued totalling £158,583 with funding partners ACE, Art Fund and South Downs National Park Authority.
- **Annual Museum Survey 2020:** The survey is now closed for submissions and data is being analysed with the aim to release findings in Spring 2021.
- **Organisational Health Checks:** SEMD team are currently running Organisational Health Check audits with over 30 museums to support Forward Planning.
- **Projects:** Currently development projects include: Growing Volunteering, Audience Champions, Unincorporated Museums, Banish the Backlog and Family-Friendly Museums.

7.10. Our Visitors

Clearly this remains a difficult and uncertain time and it is somewhat disappointing that we find ourselves at the beginning of 2022 still with deep concerns about how the visitor economy will fare over the year.

Although well below 2019 levels (the last year of “normal” operations we can use as a benchmark) we have kept to or slightly surpassed our targets for the year.

Qtr1, Qtr2 & Qtr3 visitor figures are shown below:

- The Royal Pavilion can be seen as a key indicator of visitor confidence. For November we were averaging around 63% of pre covid levels in terms of admissions but for the period 18 – 21 Dec this had dropped to 20%.
- 2021 Dec figures were c£100K in Admissions compared to budget target of 78K for the month and £119K in admissions achieved in 2019.
- 2021 December retail figures were in the region of 39K against a budget target of £29k and £36K achieved in 2019.
- 2021 Qtr3 Preston manor visitors includes Escape room attendees of c 2,189 but income from this is reflected in Enterprise rather than admissions.

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2021

	Qtr1-21	Visits	Qtr2-21	Visits	Qtr3-21	Visits
Royal Pavilion	£ 143,737	11,602	£ 467,021	35,797	£ 314,989	25,827
Brighton	£ 71,580	11,112	£ 126,954	20,086	£ 74,689	15,153
Preston	£ 2,387	517	£ 4,600	948	£ 2,102	3,086
Hove		0		1,364		2,188
Booth		0		4,883		3,953
Retail	£ 46,515		£ 110,152		£ 101,790	
	£ 264,219	23,231	£ 708,727	63,078	£ 493,570	50,207

2019

	Qtr1-19	Visits	Qtr2-19	Visits	Qtr3-19	Visits
Royal Pavilion	£ 973,122	102,578	£1,031,466	101,397	£ 451,768	44,877
Brighton	£ 63,739	23,019	£ 95,271	28,570	£ 37,755	19,689
Preston	£ 14,387	3,815	£ 16,101	3,986	£ 12,979	5,839
Hove		4,660		5,115		4,478
Booth		4,944		7,576		5,485
Retail	£ 232,269		£ 272,547		£ 140,232	
	£ 1,283,517	139,016	£1,415,385	146,644	£ 642,734	80,368

Visitor profile has changed considerably as you would expect given heavy reliance particularly at the Royal Pavilion on International visitors and groups.

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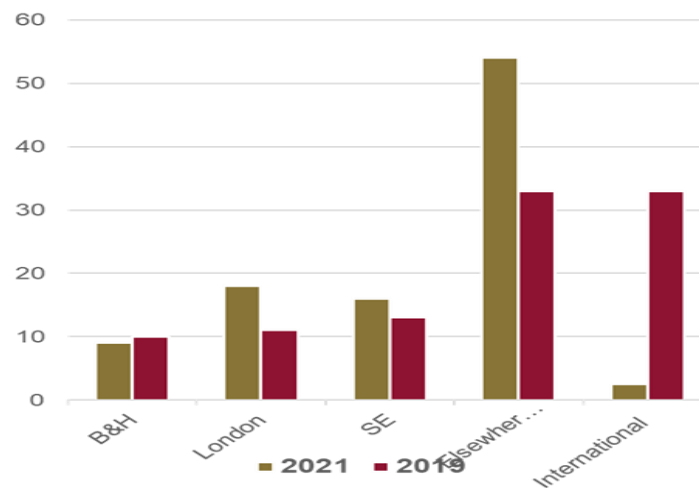
International visitors as a proportion of overall visitors for the service have dropped from approximately 33% to less than 3%. The staycation impact is demonstrated from the increase in the proportion of visitors particularly from elsewhere in the UK.

The trend towards pre booking and purchasing tickets online has proved positive in that we now have more data about our visitors and have been able to undertake follow up surveys.

During the year visitor satisfaction levels have consistently outstripped pre pandemic levels with 96% of visitors saying their visit was Excellent or Good compared to 89% in 2019.

General appreciation for being able to experience cultural venues and socialise has no doubt contributed in part to this positive up swing.

The downloadable Royal Pavilion audio tour which can now be listened to on your own phone – a Covid necessitated piece of development undertaken during the first lockdown due to desire not to use audio guides - has been incredibly popular with visitors and will now be rolled out into other languages 41% of visitors surveyed in May - June used the phone app on their tour of the Royal Pavilion.



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Sample comments 2021-22

- *Very enjoyable visit. Staff were welcoming, efficient & knowledgeable. Might be helpful to have some leaflet or other info on the Church & Preston Park.*
- *As it was my first visit to the BMAG, I was very impressed. It is such a fabulous building, and a great joy to see an exhibition in these surroundings. The Bowie exhibition was great to see, then a lovely stroll around other exhibitions on display there. Well done.*
- *Fantastic place to visit! Beautiful! Thank you everyone who keeps the Palace in such good condition. It is a real gem!*
- *Fabulous staff in the rooms who explained the history very well. They all seemed very passionate about the Pavilion and its history. I've already recommended it to friends and family. A real national treasure and great it's accessible and affordable for everyone.*
- *A brilliant example to other venues, easy to access and use, it really enhanced our visit.*

APPENDIX 1 Admission Charges

Admission charges are applied at three of the BHCC's Royal Pavilion & Museum venues, the Royal Pavilion, Preston Manor and Brighton Museum. Income from admissions typically represents 44% of the RPMTs operational budget. Admission charges of comparable visitor attractions are used to benchmark RPMT.

- Royal Pavilion comparators are other Historic houses/castles from Visit England's top attractions monitor plus leading attractions in 45-minute drive time. (Including HRP, Leeds Castle, Arundel, Petworth, Waddesdon, Warwick Castle Buckingham Place, Windsor, Roman Baths Sealife, I360)
- Preston Manor comparators are historic houses/castles of similar scale within 45-minute drive time. (Including Parham, Charleston, Michelham Priory, Anne of Cleves)
- Brighton Museum comparators are other charging local authority or former local authority museums and museums within a 45 min drive time: (including Ditchling, Towner, Bexhill, Hastings Jerwood, Bath Museums, York Museums)

Equalities & Inclusion When fees and charges are proposed, a balance needs to be found to ensure services remain financially sustainable whilst still providing value for money. The proposed fees and charges are headline prices, but the pricing RPMT provides promotional offers and a range of flexible pricing to minimise price being a barrier to participation.

A charity group rate is offered. Resident adults are offered discounted admission at Preston Manor and the Royal Pavilion and free admission at Brighton Museum. All resident children enjoy free admission at all sites. Brighton and Hove schools don't pay admission. Brighton & Hove young people and children in care also gain free admission whether resident in Brighton & Hove or not through the Children & Young People's Trust Listen Up scheme. All students at the City's universities or higher education colleges are eligible for admission at Resident rate regardless of whether their residence is within the City.

Senior Concession rates were removed in 19/20 Seasonal/mid-week promotions such as 2 for 1's, will be applied instead to encourage these visitors at times when the buildings are at low capacity. This is in line with strategy adopted by an increasing number of Museums and Visitor Attractions reflecting the increased relative wealth of this baby boomer generation.

Pricing Review During 2022/23 we intend to work with a consultant to do a complete pricing review. This will look at admission charges against membership fees, opportunities for dynamic pricing based on building capacity, and the impact of admission charges

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on secondary spend, gift aid and donations. This year's charges therefore represent a holding pattern of a cautionary increase against the existing pricing structure

	21/22	22/23		21/22	22/23		21/22	22/23	22/23 annual pass all exhibs
Royal Pavilion			Preston Manor			Brighton Museum			
Adult	£16.00	£17.00	Adult	£8.10	£9.00	Adult	£6.20	£7.50	£12.50
B & H Schools	Free	Free	B & H Schools	Free	Free	B & H Schools	Free	Free	
Child 5-18	£10.00	£10.50	Child 5-18	£4.80	£5.00	Child 5-18	£3.60	£3.60	£5.00
Family 1 Adult & 2 Children	£26.00	£27.50	Family 1 Adult & 2 Children	£12.90	£14.00	Family 1 Adult & 2 Children	£9.80	£11.00	£17.50
Family 2 Adult & 2 Children	£42.00	£44.50	Family 2 Adult & 2 Children	£21.00	£23.00	Family 2 Adult & 2 Children	£16.00	£18.50	£30.00
Resident Adult	£8.00	£10.00	Resident Adult	£4.00	£6.00	Resident Adult	Free	Free	
Resident Child	Free	Free	Resident Child	Free	Free	Resident Child	Free	Free	
						Exhibition Bowie	£5.50	£5.50	
						Exhibition M Stafford		£3.50	
						Exhibition Goal Power		TBC	
						Exhibition Wildlife Photographer		TBC	
Multi Venue Annual Pass	21/22	22/23	Combined value indiv venue						
Adult	£27.00	£34.50	£38.50						
Child 5-18	£17.00	£18.50	£20.50						
Family 1 Adult & 2 Children	£44.00	£53.00	£59.00						
Family 2 Adult & 2 Children	£71.00	£87.50	£97.50						

Schools & Guiding Charges

The price increases proposed for guiding and schools' services are again modest increases after 2 years of prices being held because of the pandemic. Schools' charges are benchmarked against the following services: Brighton Dome & Festival, Sussex Past, Hampshire Museums Trust, Wealden Downland. RPMT also has a teacher's advisory panel at which proposed charges are discussed.

Guiding Prices

Guided Tours	21/22 PP charge	22/23 PP charge
Standard Hour guided tour minimum 15 people	£6.00	£6.50
Curator 1 hr guided tour minimum 15 people	£10.00	£10.00

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Out of ours Guided tour Min 25 people after 5pm	N/A	£30.00
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Schools Pricing

Site	Site entry fee	Session	21-22 per pupil charge	22-23 proposed charge
Royal Pavilion	B&H schools' free entry	General	£4.50	£4.60
	Non-B&H schools £9.25 per pupil	Dragons	£4.50	£4.60
Brighton Museum	All UK schools' free entry	Ancient Egypt Mummification	£4.50	£4.60
		Brighton in the Stone Age	£4.50	£4.60
		Roman Brighton	£4.50	£4.60
		Local History Mystery Mission	£5.00	£5.10
		Lunchroom	£18 per group for 30 mins additional 30 mins £9	£20 per group for 45 mins additional 30 mins £10
Preston Manor	B&H schools' free entry Non-B&H schools £4.40 per pupil	Victorian Servants KS1	£5.30	£5.40
		Victorian Servants KS2	£5.30	£5.40
		WWI Support Our Troops	£5.30	£5.40
		Murder Mystery Operation Stanford	£5.30	£5.40
		Lunchroom	£18 per group for 45 mins additional 30 mins £9	£20 per group for 45 mins additional 30 mins £10
Hove Museum	Free for everyone	Toys	£4.50	£4.60
Booth Museum	Free for everyone	Skeletons	£4.50	£4.60
		Mary Anning	£4.50	£4.60

Corporate Hire & Wedding Fees

Wedding & Corporate Hire prices are laid out below. These are benchmarked against local venues as well as comparable venues within the region and nationally.

Corporate Hire Fees	Current	Proposed
	2021/22	2022/23
	Rate	Rate
Royal Pavilion		
Great Kitchen Mon - Thurs evening hire	£ 1,800.00	£ 1,850.00
Great Kitchen Fri, Sat, Sun & BH's evening hire	£ 2,000.00	£ 2,050.00
Banqueting Suite Mon - Thurs	£ 4,100.00	£ 4,200.00
Banqueting Suite Fri, Sat, Sun & BH's	£ 4,350.00	£ 4,450.00
Music Rm Mon - Thurs evening hire	£ 2,500.00	£ 2,600.00
Music Rm Fri, Sat, Sun & BH's evening hire	£ 2,700.00	£ 2,800.00
Banqueting Suite & Music Rm Mon - Thurs	£ 5,500.00	£ 5,650.00
Banqueting Suite & Music Rm Fri, Sat, Sun & BH's	£ 5,800.00	£ 5,950.00
William IV Rm Mon - Thurs (4 hr hire)	£ 950.00	£ 1,100.00
William IV Rm Fri, Sat, Sun & BH's (4hr hire)	£ 1,100.00	£ 1,250.00
William IV Rm Mon - Thurs (8hr hire)	£ 1,300.00	£ 1,500.00
William IV Rm Fri, Sat, Sun & BH's (8hr hire)	£ 1,550.00	£ 1,775.00
Red Drawing Rm Mon - Thurs (4hr hire)	£ 950.00	£ 1,100.00
Red Drawing Rm Fri, Sat, Sun & BH's (4 hr hire)	£ 1,100.00	£ 1,250.00
Red Drawing Rm Mon - Thurs (8hr hire)	£ 1,300.00	£ 1,500.00
Red Drawing Rm Fri, Sat, Sun & BH's (8hr hire)	£ 1,550.00	£ 1,775.00
Red Drawing Rm & William IV Rm Mon - Thurs (8hr hire)	£ 1,600.00	£ 1,850.00
Red Drawing Rm & William IV Rm Fri, Sat, Sun & BH's (8hr hire)	£ 1,900.00	£ 2,200.00
Royal Pavilion Garden		
RP Garden Western Lawns	PoA	PoA
RP Garden Eastern lawns	PoA	PoA
RP Garden North east lawn	PoA	PoA

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Preston Manor		
House Standing Reception Mon - Thurs (2hr hire)	£ 695.00	£ 725.00
House Standing Reception Fri, Sat, Sun & BH's (2 hr hire)	£ 785.00	£ 820.00
Tour Mon - Thurs - min 25 attendees	£ 5.00	£ 5.50
Tour Fri, Sat, Sun & BH's- min 25 attendees	£ 5.50	£ 6.00
Preston Manor Garden		
South Lawn & Walled Garden	PoA	PoA
North, South Lawns & Walled Garden	PoA	PoA
Brighton Museum		
Entire Museum Mon-Thurs	£ 2,900.00	£ 3,000.00
Entire Museum Fri, Sat, Sun & BH's	£ 3,350.00	£ 3,450.00
Ground Floor Mon-Thurs	£ 1,850.00	£ 1,950.00
Ground Floor Fri, Sat, Sun & BH's	£ 2,150.00	£ 2,250.00
Courthouse		
Half day rate / evening lecture (4 hrs) Mon-Thurs	£ 600.00	£ 525.00
Half day rate / evening lecture (4 hrs) Fri, Sat, Sun & BH's	£ 690.00	£ 600.00
All day rate (8 hrs) Mon-Thurs	£ 1,150.00	£ 950.00
All day rate (8 hrs) Fri, Sat, Sun & BH's	£ 1,300.00	£ 1,100.00
Hove Museum		
Standing Reception Mon - Thurs (2hr hire)	£ 695.00	£ 725.00
Standing Reception Fri, Sat, Sun & BH's (2 hr hire)	£ 785.00	£ 825.00
Hove Museum Grounds		
Grounds	PoA	PoA

Wedding Fees	Current	Proposed
	2021/22	2022/23
	Rate	Rate
Royal Pavilion Ceremonies		
Music Rm Mon - Thurs	£ 3,650.00	£ 3,750.00
Music Rm Fri, Sat, Sun & BH's	£ 3,850.00	£ 3,950.00
Red Drawing Rm Mon - Thurs	£ 815.00	£ 840.00

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Red Drawing Rm Fri, Sat, Sun & BH's	£ 915.00	£ 940.00
Royal Pavilion Receptions		
William IV Rm Mon - Thurs (4 hr hire)	£ 1,350.00	£ 1,380.00
William IV Rm Fri, Sat, Sun & BH's (4 hr hire)	£ 1,450.00	£ 1,480.00
Royal Pavilion Ceremony & Reception Joint		
Red Drawing Rm & William IV Rm (4 hr reception hire) Mon - Thurs	£ 1,750.00	£ 1,800.00
Red Drawing Rm & William IV Rm (4 hr reception hire) Fri, Sat, Sun & BH's	£ 1,900.00	£ 1,950.00
Red Drawing Rm & William IV Rm (1 hr reception hire) Mon - Thurs	£ 1,100.00	£ 1,150.00
Red Drawing Rm & William IV Rm (1 hr reception hire) Fri, Sat, Sun & BH's	£ 1,250.00	£ 1,300.00
Royal Pavilion Wedding & Pre Wedding Photoshoots		
External (1.5 hrs)	£ 330.00	£ 340.00
External & Internal (2 hrs)	£ 595.00	£ 610.00
Preston Manor Grounds		
PM Croquet Lawn	£ 2,500.00	£ 2,600.00

APPENDIX 2: Strategic Risk Register

No	Risk	Consequence	Likelihood	Impact	Score	Mitigation	Likelihood	Impact	Score	date
1	COVID Government guidance/legislation changes	Need to close sites, change arrangements	2	4	8	Controls: Gather intelligence; meet regularly.	2	3	6	1/22
2	Visitors worried about COVID	Fewer visitors	4	4	16	Controls: Clean sites Good signage and marketing	3	3	9	1/22
3	Staff sickness from COVID, poor management of sickness	Low morale, sickness absence,	3	3	9	Controls: Clear guidance, good communications	2	3	6	1/22
4	Move to flexible working not well managed	Poor staff performance	2	2	4	Controls: Careful project management, clear guidance and communications	2	1	2	11/21
5	Move to new finance system delayed or unsuccessfully implemented	Financial implications, lack of financial information available	3	4	12	Controls: Good project management and planning	2	2	4	11/21
6	Move to new payroll system delayed or unsuccessfully implemented	Continued reliance on BHCC, effect on staff	3	3	6	Controls: Good planning; good project management.	2	2	4	11/21
7	Anti-social behaviour in RP garden, Hove and Preston manor	Risk to building, staff and public. Bad publicity, extra cost	4	4	16	Controls: Security maintained and reviewed. Discussions with police and BHCC for extra support. Future actions: Long term plans for better perimeter security.	3	3	9	12/21
8	Poor building maintenance planning	Long-term decline, over-runs and extra costs, sites not available at key times	4	4	16	Controls: New management procedures, planning and reporting. Future actions: New staff structure	2	2	4	12/21
9	Garden project delays/overruns	Extra cost, loss of reputation.	4	3	12	Controls: Good project management and reporting. Close liaison with BHCC.	3	3	9	12/21
10	Delays in strategic reviews	Extra costs, loss of reputation. Delays. Unable to forward plan effectively.	4	3	12	Controls: Proper allocation of resources, regular reporting and monitoring. Good project management.	3	3	9	12/21
11	Natural disaster	Serious damage to property leading to extra costs and closures.	2	4	8	Controls: Monitoring, good building maintenance	2	2	4	12/21
12	Terrorism	Attack on building or staff/public	2	4	8	Controls: monitoring, reporting, added security when needed. Future actions: better perimeter controls	2	3	6	12/21
13	Cyber attack	Loss of systems, expense,	3	3	9	Controls: good practice, staff training Future actions: insurance	2	2	4	12/21
14	Supply of goods interrupted;	Not being able to employ/use expert	4	3	12	Controls: following guidance; planning ahead, marketing	3	3	9	12/21

Royal Pavilion & Museums Trust Annual Service Plan 2022-23

15	Industrial action	Breakdown in staff/management relations leading to loss of staff support	3	4	12	Controls: follow legislation and guidance, maintain good communications, plan ahead	3	3	9	12/21
16	Lack of progress on diversity	Failure to diversify staff and governance leading to lack of external support	2	3	6	Controls: gather evidence Future actions: Introduce targets, follow guidance, put in place active measures.	1	2	3	12/21
17	Poor public programming	Fall in visitors and income, fall in external support	2	3	6	Controls: Understand audiences, consult widely, plan ahead.	1	2	3	12/21
18	Lack of staff expertise	Unable to keep or recruit necessary expertise to deliver programmes.	2	3	6	Controls: actively support best staff; find good mechanisms for recruitment; pay competitive salaries.	2	2	4	12/21
19	Loss of ACE funding/support	Loss of NPO funding	2	4	8	Controls: Follow guidance clearly; put adequate resources into relationship and applications. Forward planning.	2	2	4	12/21
20	Loss of BHCC funding/support	Loss of core funding	2	4	8	Controls: Maintain close relationship, report correctly, put proper resources into reporting.	1	4	4	12/21
21	Failure to hit financial targets	Unable to deliver programmes, loss of staff.	3	4	12	Controls: Maintain close financial reporting/monitoring. Act in good time as needed.	3	3	9	12/21
22	Financial controls are not put in place	Lack of confidence from stakeholders. Fraud.	2	4	8	Controls: put proper resources into completion.	2	4	8	12/21
23	Fire	Destruction/loss/damage to buildings and collections	2	4	8	Controls: training; monitoring; external specialist advice; strategies	2	2	4	1/22

Likelihood: 1-5

Impact: 1-5

1-3	4-7	8-14	15-25
Minimal risk	Low risk	Risk needing ongoing monitoring and actions	High risk needing further mitigation

Subject:		Brighton Dome & Festival Trust Annual Report 2022/23	
Date of Meeting:		10th March 2022	
Report of:		Executive Director Economy, Environment and Culture	
Contact Officer:	Name:	Mark Croston	Tel: 01273 292571
	Email:	mark.croston@brighton-hove.gov.uk	
Ward(s) affected:		All	

FOR GENERAL RELEASE

1. PURPOSE OF REPORT AND POLICY CONTEXT

- 1.1 The Brighton Dome and Brighton Festival is a key cultural asset which enhances the city's reputation nationally and internationally. The organisation is recognised for artistic excellence, as well as for supporting a wide range of creative initiatives for young people and communities across Brighton and Hove. In March 2021, this committee requested that a report, detailing the impact of the trust throughout the previous 12 months, combined with plans for the year ahead, is presented annually.
- 1.2 The organisation has been greatly affected by the pandemic but has continued to deliver all of its core activities (albeit often in altered forms) over the past 24 months. The Council provides annual funding for Brighton Dome and Brighton Festival as part of the lease arrangements. This report provides detail on the outcomes achieved by the organisation over the last year, an overview of the ongoing capital investment into the site and plans for 2022/23.

2. RECOMMENDATIONS:

- 2.1 That Councillors note the difficult circumstances facing the Trust as it moves forward into 2022/23 as a result of successive lockdowns, audience restrictions and challenges faced with the capital programme over the course of the past year.
- 2.2 That Councillors support the outline plans for 2022/23.

3. CONTEXT/BACKGROUND INFORMATION

- 3.1 Funding to Brighton Dome and Brighton Festival (BDBF) is one of the principal investments Brighton & Hove City Council (BHCC) makes in arts and culture. Brighton Dome is a Grade I listed building owned by the city council. It provides a programme of work across all art forms and delivers the annual Brighton Festival in May. There are three spaces within Brighton Dome: the Concert Hall, the Corn Exchange and the Studio Theatre. BDBF also manages both Brighton & Hove Music & Arts Service and East Sussex Music Service.

- 3.2 BDBF has an annual turnover of £12.5m and is a registered charity. A recent economic impact study indicates the organisation's activities support 1125 FTE jobs in the city centre and, together with the Royal Pavilion & Museums, contributes £60m per year to the local economy.

Legal Structure & Funding

- 3.3 BDBF was established as a registered charity 'Brighton Festival Limited' in 1999, its predecessor Brighton Festival Society having been formed in 1966. On 30th April 1999 the council set up a 50-year lease agreement with annual revenue funding to BDBF linked to the lease. The Lease determines the obligations on BDBF and requires the city council to provide funding to support the activity of both Brighton Dome and Brighton Festival. In 2021/22 this funding amounted to £1,757,460.

Activity Report

- 3.6 In 2020/21 the charity earned 26% of its operating income from ticket sales, sponsorship, catering and the private event income and 74% of its income through grants and donations. This is almost a complete reversal of previous non-Covid years (e.g. in 2019 63% from commercial activity and 37% via grants and donations). Ordinarily, 31% of income comes from the Charity's two public funders: BHCC and Arts Council England (ACE). The Charity is a long-standing ACE National Portfolio Organisation with just over £4,500,000 of committed funding in the period from 1 April 2018 to 31 March 2022.
- 3.7 Further to significant support received in 2020/21 from ACE Emergency Funds and the DCMS Culture Recovery Fund (reported to this committee in 2021) a further £915,505 was received in Rounds 2 and 3 of the Culture Recovery Fund to support its operations through the continuing impacts of Covid-19.
- 3.8 Creative Learning programmes, principally for children & young people, have been enhanced since the addition of the Brighton & Hove Music Service in 2017 and the East Sussex Music Service in 2019, now 'Create Music' (see 3.21 below. Total expenditure on Creative Learning activities totalled £2,817,673.
- 3.9 BDBF is a Living Wage Employer and has 143 permanent employees, 84 casual music teachers and around 170 casual staff working across venue operations. Existing close working relationships with trade unions BECTU and NUTs have been furthered strengthened during 2021 with the aim of protecting jobs.
- 3.10 Attendance at Brighton Dome Concert Hall during 2021/22 has been significantly affected by Covid 19 and the restrictions on live events. BDBF was the first major arts festival to take place in 2021, with an adapted outdoors, online and safely back onstage Brighton Festival. BDBF continued to deliver socially distanced events in the concert hall between April and August 2021 and returned to full operation without social distancing from September 2021.
- 3.11 Ticket sales for Brighton Festival 2021 were 74% lower than the 2019 Festival as BDBF limited the volume of indoor larger capacity events. The overall subsidy of work in the festival increased by £120k (27%) because BDBF still maintained high levels of investment in new artistic content.

- 3.12 BDBF's total audience reach was just over 200,000 during 2021/22, which is around 50% of 2019's total reach and less than one third of the anticipated reach when all three performance spaces return to full operation. Occupancy levels were still high at 79% (91% for outdoor ticketed events during Brighton Festival).
- 3.14 Across the remainder of 2021, BDBF continued to deliver experiences online for audiences (theatre, spoken word, literature and music events both live-streamed and made for online) and engagement with children and young people. The two music services, when not able to teach in schools, developed an online offer and continued to teach around 3000 students a week.

Royal Pavilion Estate Phase One: Capital Project

- 3.16 Phase one of the Royal Pavilion Estate masterplan currently on site sees the restoration and redevelopment of the Council's Grade I listed Corn Exchange and Grade II listed Studio Theatre, protecting at-risk heritage buildings, lowering environmental impact and operating costs and providing new space for community and artist rehearsals.
- 3.17 Managed by BHCC's Major Projects team, the project has attracted over £19.6m of investment from ACE, National Lottery Heritage Fund, Coast to Capital LEP and private fundraising. Project costs have increased since works began on site in February 2017 due to finds on site including a former Quaker burial ground, significant structural defects in the 200-year-old Corn Exchange timber roof and wall frame, and the former Main Contractor leaving site and entering administration. The project is scheduled for completion in Autumn 2022.

Looking Ahead into 2022 – 2023

- 3.18 In 2020 BDBF developed a plan for managing the impact of Covid-19 and ensuring the organisation's future sustainability. Titled 'Recovery, Renewal, Reopening', the plan ensured financial viability through the two financial years 20/21 and 21/22, assuming significantly reduced activity through until October 2021, which proved largely correct. It also sets out principles to guide planning throughout the pandemic and for the future:
- engage and connect with audiences and residents
 - be an open and porous organisation for artists and partners, facilitating and brokering new ways of working
 - reflect and celebrate the international outlook of Brighton & Hove
 - prioritise artistic work that enhances their distinctiveness and that of the city through:
 - a focus on marginalised voices, on inclusivity and social justice
 - a sense of physical location and scale
 - fostering partnerships nationally and internationally
 - exploring new technologies (specifically 5G) and developing their online offer
 - having a clearly curated, artist-led identity
 - develop artists of the future and deliver creative opportunities for all children & young people

- protect jobs wherever possible and retain vital talent and skills in their permanent workforce
 - ensure the organisation's long-term financial and environmental sustainability
- 3.19 Brighton Dome Concert Hall will continue to operate a full diary of events throughout 2022 with strong support from promoters, artists and audiences. Although it is hoped that Covid-19 restrictions will not return, the BDBF team has managed Covid-measures throughout the pandemic and will respond accordingly.
- 3.20 Brighton Festival 2022 will take place from 7-29 May with a full programme launch in February 2022. Syrian architect Marwa al-Sabouni and theatre maker Tristan Sharps have been appointed Guest Co-Directors, the first time since its introduction in 2009 the role has been shared.
- 3.21 Create Music, a joint collaboration bringing together the educational services of Brighton & Hove Music & Arts (BHMA) and East Sussex Music (ESM), will offer music tuition to more children & young people and offer a broad range of music learning experiences both in and outside of schools across our region. Create Music will be one of the largest providers of music education in the UK, reaching over 18,500 children and young people across 262 participating schools and music centres, spanning from Hove to Hastings.
- 3.22 Initial testbed investment in 5G infrastructure (through partnership with Wired Sussex and Digital Catapult) has received a significant financial boost from the Department for Digital, Culture, Media & Sport via the 5G Create awards. This will deliver a 5G Powered Festival concept working with industry leaders Warner Music, O2 (Telefonica UK), Digital Catapult, Mativision, Metropolis and Sonosphere. The initiative will enable artists to collaborate creatively and audiences to engage and connect both remotely and live, using cutting edge technology. The 5G Festival in March 2022 invests in talent and idea development so that Brighton can continue to be at the cutting edge of art and technology, combining to create new cultural experiences.
- 3.27 Through support from the Cultural Recovery Fund, BDBF has implemented the Artist in House scheme. There are four awards of £10,000 to sustain artist creative practice and to contribute their voice to the BDBF team, influencing its ways of working and planning. BDBF received 55 applications with 69% of applicants identifying as diverse in one or more ways.

4 ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 4.1 There are no alternative options to consider. BDBF is a well-established charity operating successfully. Whilst the Pandemic has caused the venue to be closed intermittently and the capital programme in part, it is fully anticipated that it will re-open and return to normal operations by the end of 2022.
- 4.2 The alternative option is that the buildings come back to the city council, which is not considered reasonable. Despite the tremendous uncertainty and financial challenges faced by the Trust, it remains the case that the assets are best placed in an independent organisation which is supported by the city council.

5 COMMUNITY ENGAGEMENT & CONSULTATION

- 5.1 2021/22 inevitably saw a reduction in the opportunities for free open days and events, however, a number of events were still delivered. These included International Women's Day in partnership with Brighton Women's Centre and Black History Month Family Day, Heritage Open Day and Disabled Access Day BDBF provided a programme of assisted Audio Described, BSL and relaxed performances across a range of events including the family Christmas Circus programme. Brighton Dome also hosted the Mayor of Brighton & Hove and the Interfaith Group's Service of Compassion in October 2021, remembering those the city had lost during the pandemic.
- 5.2 Following the success of the community initiative 'Our Place' in Brighton Festival, partnerships with local steering groups in Hangleton and Knoll and East Brighton, Moulsecoomb and Bevendean are embedded in the year-round programme.

6 CONCLUSION

- 6.1 BDBF has been able to weather the pandemic without redundancies over the course of 2021/22 because of the public funding it has received, both from BHCC and from ACE. Additional private funds have also been raised. This means the organisation is able to emerge quickly now that indoor gatherings in venues are able to resume.
- 6.2 Provided no further Covid-related restrictions are imposed the Charity is able to resume a full diary of events in Brighton Dome Concert Hall from February 2022 onwards. The Corn Exchange capital project is scheduled for completion, towards the end of 2022 and by 2023 the entire venue will be making a full contribution to cultural life of Brighton and Hove residents.

7 FINANCIAL & OTHER IMPLICATIONS:

- 7.1 There are no direct financial implications arising from the recommendations of this report.
- 7.2 The Council has a contractual arrangement to provide funding to BDBF of £1.766m including support for the annual Brighton Festival which is built into the council's budget. In addition, the council provides an annual contribution to a sinking fund to support the high maintenance costs of the Grade 1 listed building. This contribution is £0.221m in 2022/23 and forms part of the council's Planned Maintenance Budget.

Finance Officer Consulted: James Hengeveld

Date: 11/02/22

Legal Implications:

- 7.3 The contractual arrangements with BDBF are described in the body of the report. There are no legal implications arising directly from the recommendations.

Lawyer Consulted:

Alice Rowland

Date: 11/02/22

Equalities Implications:

- 7.4 BDBF continues to receive a rating of 'strong' from ACE for its Creative Case for Diversity, appraising both the inclusivity of its public-facing programme, audience accessibility and the organisation's work to increase the diversity of its workforce and its trustee body. An Equality Action Plan is monitored by an action group made up of representatives from all levels of the organisation and describes the partnerships across the community that help to achieve set targets.

Sustainability Implications:

- 7.5 There are no sustainability implications.

Brexit Implications:

- 7.6 There are no Brexit implications.

Any Other Significant Implications:

- 7.7 None.

Crime & Disorder Implications:

- 7.8 There are no crime and disorder implications. However, the Creative Learning strand of BDBF which works with over 5,000 young people each week, engages young people in the arts and creativity and provides meaningful activities during the evening and at weekends.

Risk and Opportunity Management Implications:

- 7.9 There are no risk and opportunity management implications for the Council. BDBF is a professionally managed and governed organisation which assesses risk and opportunity carefully to ensure it is able to fulfil its obligations under the lease.

Public Health Implications:

- 7.10 Covid-safe measures have been successfully managed throughout the pandemic at Brighton Dome Concert Hall and across Create Music teaching. It is hoped activity throughout 2022/23 will be unaffected by Covid-19 restrictions as reintroduction of public health measures would inevitably impact on the Charity's sustainability. However, the BDBF team has demonstrated its ability to adapt and deliver events wherever possible within public health guidelines.

Corporate / Citywide Implications:

- 7.11 BDBF is a major employer and a catalyst for creative collaborations which enhance the city's reputation for leading the arts in England. A return to full operation in 2022/3 is important for generating community wealth and as positive contributor to mental health and well-being for residents. Brighton and Hove has one of the highest levels of arts participation in the UK. The return of Brighton Festival in 2022 to pre-pandemic scale will be a visible signal that the arts and culture are ready to restart and livelihoods can begin to be restored.

Brighton & Hove City Council

Tourism, Equalities, Communities & Culture Committee

Agenda Item 82

Subject: Public Art – Planning Advice Note and Developer Contributions Calculator

Date of meeting: 10 March 2022

Report of: Executive Director, Economy, Environment & Culture

Contact Officer: Name: Clare Flowers
Tel: 01273 290443
Email: clare.flowers@brighton-hove.gov.uk

Ward(s) affected: All

For general release

1. Purpose of the report and policy context

- 1.1 The report seeks approval for a Public Art Planning Advice Note (PAN) to inform and advise on the delivery of Public Art through the planning system. The PAN supports the Public Art Strategy 2021-2031 approved by this committee in November 2021.
- 1.2 The report also seeks approval for a Public Art Developer Contributions Calculator to be included, as an update, to the current Developer Contribution Technical Guidance. The calculator clarifies and updates the method used to calculate an appropriate developer contribution for public art. The incorporation of a minimum threshold for a contribution reflects costs associated with the necessary processes and the outcomes required for successful public art.

2. Recommendations

- 2.1 That the Committee approves the publication of the Public Art PAN (Appendix 1) to inform the delivery of public art through the planning system, subject to any minor alterations (grammatical, non-material text and illustrative) to be agreed by the Head of Planning.
- 2.2 That the Committee approves the inclusion of the Public Art Developer Contributions Calculator and associated minimum threshold (Appendix 2) as an update to the Developer Contribution Technical Guidance, subject to any minor alterations (grammatical and non-material text) to be agreed by the Head of Planning.

- 2.3 That the committee notes responses to consultation on the proposed calculator and associated minimum threshold (Appendix 3) as well as the evidenced review (Appendix 4) which informed those rates.

3. Context and background information

- 3.1 The Public Art PAN and the developer contributions calculator support the council's *Public Art Strategy 'One Landscape, Many Views'* approved by this committee in November 2021. The intention to bring forward a PAN was referenced in that committee report and is also referenced in the Strategy itself. The calculator supports the PAN. A *Public Art Commissioning Toolkit* is also being produced and will sit beneath the Public Art Strategy as a comprehensive outline of how to commission public art.

Public Art Planning Advice Note

- 3.2 The purpose of the Public Art PAN is to provide detailed planning guidance and technical information to assist and support the delivery of public art. The advice is intended for use by developers and their designers; architects; landscape designers; planners; artists and communities amongst others.
- 3.3 The PAN sets out best practice advice and shows the steps required for delivering public art through the planning system. It reviews plans and information required to be included at outline and full planning application stage and encourages the use of Public Art Delivery Plans. The PAN sets out options for public art and illustrates the benefits of delivering public art within new development. It discusses the importance of working with recognised public art professionals as well as encouraging community engagement and involvement.
- 3.4 Good practice examples of public art are included throughout the document. Some images show local examples of public art, such as 'An Alphabet for Black Rock', and some are national good practice examples.

Public Art Calculator

- 3.5 The Public Art Developer Contributions Calculator provides an updated and transparent method to work out the developer contribution relating to on-site public art provision. As a result, the contribution can be known from the earliest stages of scheme development. The calculator is identified in the PAN for working out developer contribution public art sums.
- 3.6 The calculator is based upon an evidenced review (Appendix 4) which considered all major developments within Brighton & Hove which secured a public art developer contribution as part of their planning approval granted between Jan 2013 to June 2021.

- 3.7 The calculator uses the publicly available Gross Internal Area (GIA) of a scheme to understand the scale and impact of that development. The method multiplies the GIA in £ per square metre by a rate set out in the calculator based on broad locations which reflect the CIL charging zones that have been established for the city. The evidence review demonstrates that the proposed contribution rates reflect the sums achieved for public art contributions between 2013 and 2021. The rates are therefore considered robust and justified.
- 3.8 Developer contribution sums falling below £25,000 will not be requested. This minimum threshold reflects the costs of the processes involved in the creation of successful public art and required material outcomes, including long term durability of public art works.

4. Analysis and consideration of alternative options

- 4.1 The Public Art Strategy already approved by this committee defines the council's strategic intentions to improve the quality and diversity of art in public places. Not producing a PAN to support this strategy would diminish its impact as the PAN sets out clear planning advice and good practice examples to demonstrate how public art can be successfully integrated in new developments across the city.
- 4.2 Not including an updated and transparent calculator and minimum threshold for public art developer contributions within the published Developer Contributions Technical Guidance would increasingly challenge the ongoing provision of public art as an on-site developer contribution. This would not support the council's commitment which recognises the importance of public art in terms of creative placemaking.

5. Community engagement and consultation

- 5.1 The Public Art Strategy forms the context for the PAN and engagement on this strategy has been extensive including workshops, open events and stakeholder conversations. The Statement of Community Involvement (2015) which sets out the council's approach to community engagement in planning does not require PANs to be subject to wider community consultation as they contain technical planning guidance. Internal consultation has been undertaken to ensure the PAN's information and guidance is correct and helpful.
- 5.2 The proposed calculator rates and associated minimum threshold were the subject of a six week on-line consultation on the council's portal between 28 October 2021 and 8 December 2021, following the principles of the Community Engagement Framework. 169 groups and organisations drawn from the planning policy, projects and heritage mailing list were contacted. Analysis of the consultation responses suggests the calculator, its rates and minimum threshold are robust and justified. Further details and analysis to issues raised are set out in a Consultation Report, attached as Appendix 3.

6. Conclusion

- 6.1 The delivery of successful public art in the city will be strengthened by the Public Art PAN and Developer Contribution Calculator. The PAN provides clear guidance to deliver public art through the planning system and the Calculator sets out an updated and transparent method to work out developer contributions for public art to be published in the Developer Contributions Technical Guidance.
- 6.2 Both documents support and accord with the council's Public Art Strategy 'One Landscape, Many Views' which was agreed by this council in November 2021.

7. Financial implications

- 7.1 There are no direct financial implications arising from this report.

Name of finance officer consulted: John Lack Date consulted: 03/02//22

8. Legal implications

- 8.1 The Public Art PAN and the Developer Contributions Calculator are not statutory documents but will assist in the development management process when public art is required in connection with proposed development.
- 8.2 Name of lawyer consulted: Hilary Woodward Date consulted 4/2/22

9. Equalities implications

- 9.1 The policies within City Plan Part 1 have been the subject of a Health & Equalities Impact Assessment. The PAN gives technical advice on how to deliver public art through this planning policy framework. The developer contributions calculator is an updated and transparent method of working out an existing developer contribution based on policies within City Plan Part 1.

10. Sustainability implications

- 10.1 The PAN promotes the benefits of delivering public art within new development, which includes its contribution to sustainable placemaking, and links to the Sustainability Action Plan as a relevant document in public art delivery.

Supporting Documentation

1. Appendices

- 1. Public Art Planning Advice Note

2. Public Art Developer Contributions Calculator and associated minimum threshold
3. Developer Contributions Calculator for on-site public art provision and associated minimum threshold level Consultation Report March 2022
4. Evidenced Review of all major developments within Brighton & Hove to have secured a public art developer contribution as part of their most recent planning approval granted between Jan 2013 to June 2021

PAN 10

Public Art

March 2022

Brighton & Hove City Council's Local Development Framework

Planning Advice Note



Public Art

March 2022

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Public Art

March 2022

Introduction

This Public Art PAN (Planning Advice Note) provides guidance through the planning system for public art delivered by major development schemes or through other routes. It sets out the council's planning policy framework and uses good practice examples to illustrate how public art can be successfully integrated within new development. It should be read in conjunction with the Public Art Strategy 2021-2031 One Landscape, Many Views and the Public Art Commissioning Toolkit.

Successful public art can contribute to enhancing the city's unique heritage, culture and natural assets. New development will help shape the future character of the city. Working with artists offers an opportunity to design schemes which go beyond the purely functional and create places that reflect the life, identity and aspirations of a particular place or community.

The intention of this PAN is to show how new development can contribute to the quality of place and place making, vitality of neighbourhoods, and success of the creative economy, working with the local community wherever possible. The guidance also explains how to use the spatial planning system to achieve the ambitions of the Public Art Strategy.

All arts projects in the public realm should meet key criteria of quality, access, inclusion and sustainability. This PAN demonstrates how this can be achieved through high quality design, successful commissioning, and community engagement.

This PAN provides guidance that can be used by:

- Planning applicants and their design team including designers, architects, artists, landscape designers and consultants when preparing applications, or addressing planning conditions or s106 planning obligations
- Planning officers when assessing applications and drafting planning conditions or s106 planning obligations
- Councillors when making planning decisions
- Artists, craftspeople, designers when developing proposals or projects
- Residents, community / amenity groups and other organisations when commenting on planning applications or participating in the creation of public art.

'Take the opportunity to highlight the city's amazing natural assets, combine these with the creative talent within the residents and create something extraordinary, in the most sustainable way possible.'

Public Art Strategy 2021-2031 One Landscape, Many Views

Public Art

March 2022

Executive Summary

The following steps are recommended to promote best practice for delivering public art. The developer will be expected to carry out these steps wherever possible:

- At the earliest stages review this PAN and the relevant policy requirements set out within to inform pre-application and planning application discussions; and when seeking to deliver artistic components through s106 agreements and planning conditions.
- Refer to the Public Art Strategy 2021-2031 One Landscape, Many Views to understand city wide strategies for public art.
- Refer to the Public Art Commissioning Toolkit for more comprehensive advice on commissioning and delivering public art.
- Calculate a sum using the Public Art Developer Contribution Calculator within the Developer Contribution Technical Guidance to understand the expected level of contribution.
- Refer to the list of Plans and Strategies to be included at Outline / Full Planning Application Stage.
- Use Public Art Delivery Plans wherever possible.
- Engage the community in the development of public art wherever possible.
- Work with a recognised public art professional in preparing schemes for submission to planning and in the project management of public art. This can ensure that schemes are of high quality and meet the council's requirements.
- Consider the durability and on-going maintenance arrangements of the public art to be delivered.



Morag Myerscough, *Belonging Bandstand*. 2018. A mobile temporary installation: a bright, bold, touring bandstand programmed in conjunction with communities across East Sussex, inviting them to reflect on the concept of 'belonging' by making placards to adorn its crown and programming a range of local performers to use it as a stage. The bandstand toured to eight locations, including East Brighton and Hangleton where the series of art led workshops were delivered in partnership with Your Place and Brighton Festival.

Public Art

March 2022

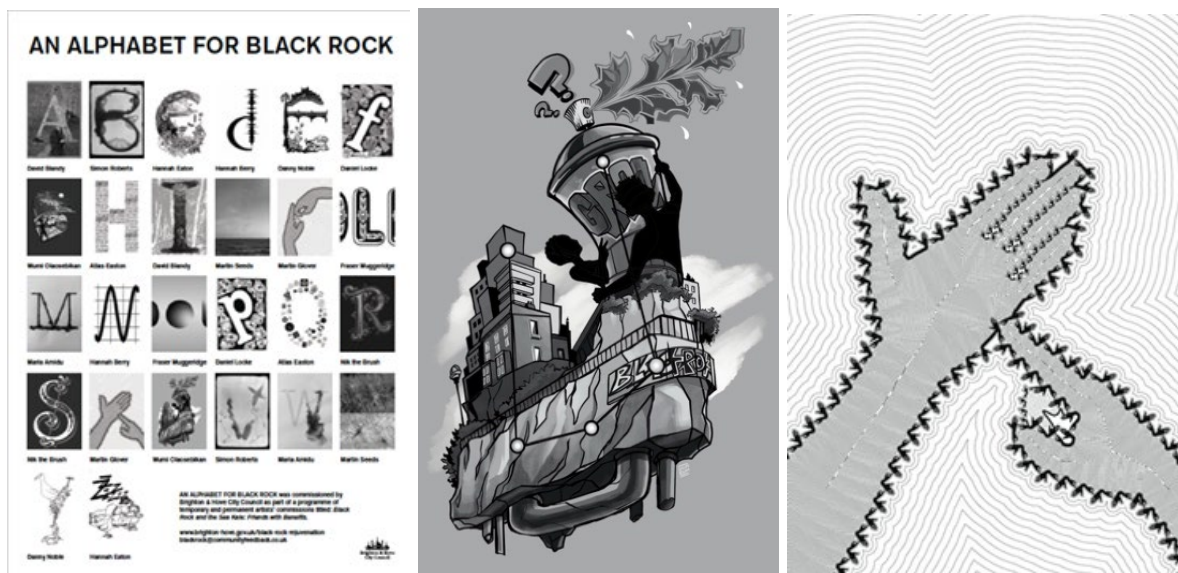
Planning Policy Framework and other relevant documents

City Plan Part One CP5 Culture and Tourism; CP7 Infrastructure and Developer Contributions; CP12 Urban Design; CP13 Public Streets and Spaces and supporting paragraph 4.157 are relevant. These policies guide the integration of funding and delivery of public art and artistic element into public realm spaces.

Brighton & Hove Retained Local Plan 2016 QD15 Landscape Design asks planning applicants to consider landscape and spaces between and around buildings at early design stage. Retained policy QD15 will be superseded by policy DM18 below on adoption of the City Plan Part Two.

Submission City Plan Part Two DM18 High Quality design and places and supporting paragraph 2.158 looks for the incorporation of an artistic element for major development proposals as well as to have regard to the Public Art Strategy.

Urban Design Framework Supplementary Planning Document. Section 2.5 Artistic Element identifies artistic element as a local priority and sets out guidance on incorporation of artistic element into design proposals.



An Alphabet for Black Rock, thirteen artists/designers, commissioned by Brighton & Hove City Council for site hoardings at Black Rock as part of the public art programme Black Rock and the Sea Kale: Friends with Benefits, 2021. Each artist / designer producing two letters at AO size in black and white for flyposting the names of native plant species on the hoarding. Letter U: Wumi Olaosebikan; Letter T: Martin Glover.

Public Art Strategy 2021-2031 One Landscape, Many Views lays out a definition for art in public places, with clear guiding principles and objectives to re-affirm the long-term commitment of Brighton & Hove as a 'city of creativity'.

Public Art

March 2022

Public Art Commissioning Toolkit (2022) provides a comprehensive outline of how to commission public art. Appendix 1 sets out an Art Commissioning Process diagram which relates to this Toolkit.

[Developer Contributions Technical Guidance](#) contains a Public Art Developer Contributions Calculator and an associated minimum threshold. The calculator sets out the methodology and rates required to calculate a public art developer contribution.

[Sustainability Action Plan](#) aims to foster community identity and connectedness, and nurture sustainability including through use of procurement criteria.

[Statement of Community Involvement](#) (2015) sets out this council's approach to community engagement in planning.

Section 1 - Contemporary Public Art

The term 'public art' defines a broad range of art including permanent and temporary installations and artworks that reflect the life of the city, its communities, and visitors. Public art is for everyone to enjoy. It can be found across the city within its streets, parks, seafront and undeveloped sites to stations, hospitals, universities, the South Downs National Park and public buildings.

Public art is often described as 'art in the public realm' where the city itself becomes the gallery.

Options for Public Art

Public art can:

- contribute to high quality place-making
- be permanent or temporary
- be socially engaged, working with new or existing communities
- incorporate text, craft, applied art and design, photography, print, moving image, computer generated images, projection, live art, digital realities, installation and performance, light, sound and music
- be integral to landscape design, street furniture, small interventions or large-scale land art
- aid accessibility, legibility and reinforce routes and links
- create informal opportunities for play
- refer to our heritage or celebrate the future, highlight specific areas and issues, be activist or environmental art or be conceptual.

Public Art

March 2022



Eleanor Hill, The Wood Street Altarpiece, Walthamstow, London. 2021. Designed in collaboration with local residents the installation celebrates community gardening in Walthamstow and animates a railway bridge. The permanent artwork is a screen-printed enamel triptych within an ecclesiastical-inspired aluminium frame and integrated lighting. The work displays stories gathered from community submissions during the pandemic lockdowns of 2020. It contains portraits of individuals who live in the area, contributed to the ecology and improved their local environment.



The Public Art Strategy recommends engagement across council departments, landowners, developers, and businesses to discuss temporary activities and interventions: including identification of sites and opportunities for meanwhile uses which might be artist-led or facilitated.

The outcome of public art should be unique and inspiring with one consistent quality: it should be site-specific and relate to the context or use of a particular site or location within the public realm.

Public Art

March 2022



Lucy Williams, The Open Market, Marshalls Row, Brighton. 2016. The archways at Brighton Open Market by designer Lucy Williams were commissioned by Hyde Housing with s106 funding as part of the redevelopment. Lit with LED lights the acrylic font interiors are decorated with shapes of objects found in the market.

The benefits of delivering Public Art as part of new development

Public art can contribute to a range of benefits to the private, voluntary, and public sectors. These benefits can be significant when well thought out, adequately funded and appropriately delivered:

- **Economic** – encourages inward investment, promotes a sense of confidence and positivity
- **Social** – promotes civic and personal pride, encourages people to rediscover and interact with their environment, used as a tool to facilitate social inclusion
- **Environmental** – regeneration, placemaking, sustainable, legible, promoting green values or functions
- **Cultural** – community development tool, raises the profile of the arts in general, offers opportunities for people to participate in the arts.

There are links between a rich artistic and cultural offer and economic success. All over the world major cities are using culture as a catalyst for change. Beautiful and green places with a rich cultural life are far more likely to attract and sustain businesses. Public art used by the private sector can enhance commercial aspirations and deliver enhanced profitability.

Public Art

March 2022

Some of the benefits for public art include:

- A higher profile for specific locations e.g. city centres, individual neighbourhoods. Unique natural environments can lead to increased visitor footfall and commercial activity, an increase in property values and commercial rents, attract investment from public and private sectors
- Encouraging tourism by giving an area a competitive edge in relation to competing visitor destinations
- Stimulating the local economy through creating local employment and developing skills, and contributing to the social value deliverables of a development
- Public engagement, an enhanced sense of ownership, increased sense of self-esteem, and community pride for participating groups and responsibility for the public spaces that a co-designed artwork occupies
- Creating local distinctiveness and improving legibility by for example, the use of landmarks at entrances and other key points in public spaces
- Increased use of open spaces, reclaiming areas and helping reduce levels of crime and vandalism by creating a sense of ownership and security
- Humanising environments, promote sustainability and integrate community involvement in creating a cultural legacy for the future
- Enhancing the public realm by involving artists' creative skills, vision and imagination whilst raising the standard of landscaping and design through creative use of materials and finishes.

Successful public art is delivered through community engagement, sensitivity and relevance to the site, sufficient fees and budgets, realistic expectations, good project management and communication, good maintenance.

Section 2 - Delivering Public Art through the planning system

Calculating the Public Art Developer Contribution

The [Developer Contributions Technical Guidance](#) contains a Public Art Developer Contributions Calculator and an associated threshold level. This calculator sets out the methodology, thresholds and rates required for calculating public art developer contribution sums.

Once a sum has been calculated using the Public Art Developer Contribution calculator, the final contribution will be a matter for the case officer to test against other developer contributions requirements for the development.

Public Art

March 2022



Studio Morison, LookLookLook, at Berrington Hall, Herefordshire. 2019. Commissioned by the National Trust as part of the Trust New Art Programme launched to introduce more contemporary arts into their heritage sites to reflect the increasing diversity of their audiences. Inspired by pineapples once thought to have been grown in the gardens.



Pre-application work - Public Art as part of an overall site design vision

The public art element of a development should be an integral part of the overall vision for the site and its setting. The creation of a public art strategy for the development site can have a positive influence on outcomes for the layout and design of the final development scheme if it is considered as an integral part at the start of the design process. For example, in addition to the permanent artworks the public art element can include artwork for hoardings and other temporary projects. Where appropriate, the public art element may be discussed at Design Panel Review.

As a specialist area, developers are recommended to engage with recognised public art professionals preferably at pre-application stage onwards in preparing schemes for submission and for project managing the delivery of public art schemes.

Public Art

March 2022

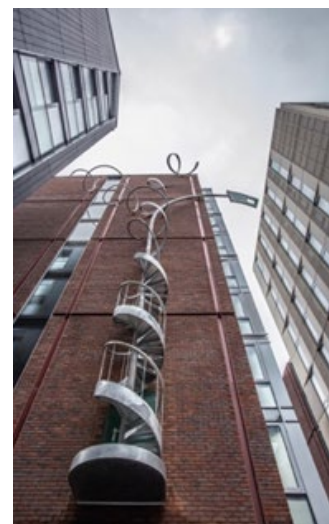
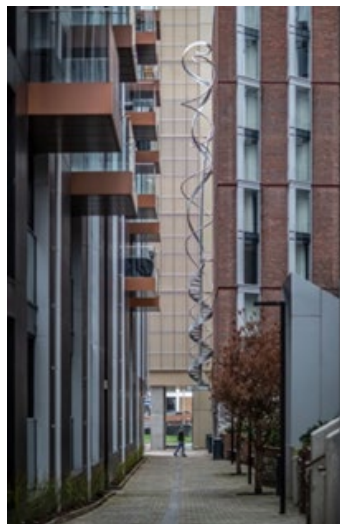
Plans and Strategies to be included at Outline / Full Planning Application Stage

Public art plans presented by the developer at outline or full planning stage as part of the Design and Access Statement should include but not be limited to:

- Strategic approach outlining the rationale behind why the developer is proposing a particular scheme – how it relates to the site and its uses
- Artist's brief/s - see the Public Art Commissioning Toolkit for more guidance
- Proposed approach to community engagement / involvement
- Arrangements for commissioning, including a longlist of artists if appropriate
- Proposed implementation plan including phasing
- Arrangements for project management
- Budget allocation
- Future maintenance, durability and Health & Safety
- Sustainability considerations.

Reserved Matters

Where appropriate, final details (including detailed designs for any permanent features) should be agreed as part of Reserved Matters.



Alex Chinneck, *A Spring in Your Step*, Circus Street Brighton. 2022. Commissioned by U+I with s106 funding, *A Spring in Your Step*, is a 25-metre spiral staircase that springs apart in three directions across the facade of one of the buildings. The artwork was fabricated and installed by millimetre, who are based in Portslade. This is one of several artworks commissioned for the Circus Street development, a Public Private Partnership with Brighton & Hove City Council that provides new homes, office space including workshops for start-ups, student accommodation and a new base for South East Dance.

Public Art

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Public Art Delivery Plans

Applicants should consider including the following details within the delivery plan. There may be some variation in detail depending on whether the application is for outline consent or for full planning permission:

- Description of the relationship between the Public Art Plan and the relevant local plan policies outlined in this PAN
- Description of the site wide approach to be taken toward artistic elements
- including key locations, connectivity, reasoning and context or heritage as well as information on form, themes and materials
- Details of the selection and commissioning process for the artistic element
- Indicative timescales for the artist commissioning process
- Indicative budget allocations for the delivery of the artistic element
- Indicative details of ownership, maintenance and potential de-commissioning of the artistic element
- Plans for sustainability
- A Commissioning Brief (see the Public Art Commissioning Toolkit for guidance)
- Details of proposed community engagement
- Evaluation methodology
- Whenever possible, a representative of, or stakeholder with art expertise nominated by, the council's Art team

Submitting a Public Art Delivery Plan to accompany relevant planning applications is strongly recommended.

Securing Public Art through the planning system

Public Art can be secured via a planning condition, or an Artistic Component Schedule within a s106 legal agreement made between the council and the developer.

Local authority planners should consider the use of appropriate planning conditions, a s106 Artistic Component Schedule and/or informative notes that can be attached to planning consents in relation to artistic elements in developments. Within this, the durability and on-going maintenance arrangements of the public art should be considered.

Public Art

March 2022



Wind Sculpture, Yinka Shonibare CBE, London. 2014. Commission by Doughty Hanson and Terrace Hill for Howick Place in Victoria. The work explores the notion of harnessing movement, through the idea of capturing and freezing a volume of wind in a moment in time.

Delivering an Artistic Component Schedule contained within a s106 agreement

It is the responsibility of the developer and their team to consider and deliver artistic component(s) if there is an Artistic Component Schedule within their s106 agreement. These agreements often require the proposed commissioning processes to be approved prior to the artist being formally commissioned and prior to commencement of development. This is so that the art element(s) is considered as a fundamental part of the scheme and not as an add-on.

When considering a commissioning process to meet a developer obligation, the following elements will need to be managed by the developer:

- Drafting a Brief – to include site details, the vision, timetable, costs and how artists can submit expressions of interest
- Ensuring community engagement includes identifying local representatives for example neighbourhood forums; it is expected that ward councillors will be invited to the selection panel
- Setting up the selection panel to interview shortlisted artists and appointment of the chosen artist.

Proposed submissions should be issued to the Planning case officer in good time in accordance with the terms of the s106 agreement for approval and discharge of the obligation.

Public Art

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In meeting the terms of the s106 agreement developers will need to consider the objectives below:

- Wherever possible the artistic component(s) being accessible or visible to the wider public – in or on the building
- Public art installations can be achieved through the uplift of costs such as through higher quality materials and bespoke design where the proposal is an enhancement to the immediate public realm
- The durability of the artistic component and ongoing maintenance requirements / arrangements suitable for the longer term.

On some major development schemes where developers are commissioning arts consultants, it may be acceptable for a reasonable percentage of costs to be met from the s106 contribution where agreed in advance.

Any installation proposals outside the development/on the highway may also require prior planning permission.



ALTER, The Happenstance Archway, Brighton. 2018. The Happenstance, a pedestrian archway welcomes visitors entering at the southern entrance of The Level Park at St Peter's Place. Funded by Section 106 contributions. It is made from mirrored stainless steel and incorporates names and faces of historical figures that have importance to The Level and Brighton & Hove emerging from the perforations. The images were chosen following consultation with park users.

Public Art

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Community Engagement and Involvement

A key factor in good public art practice is community engagement. A sense of ownership, public access and contribution to artwork development can be harnessed through artist engagement where the council advocates that public art can be a platform for openly engaging with communities both existing and future alongside the commissioning process.

The community can be involved in the public art process in a variety of ways such as:

- Ensuring that local stakeholders with an interest in the project are represented on a steering group, and potentially forming part of the selection panel; as happened during the redevelopment of the Former Amex House in the Edward Street Quarter, Brighton. The steering group can act as ambassadors for the project and provide vital connections and resources to assist artists in the creation of the final artwork or wider arts programme.
- Giving voice and value to marginalised and ignored people, groups and heritage within a community, and advocating for the necessity of inclusive, accessible art and design
- Holding workshops to share skills and artist/curator talks to widen the knowledge of how cultural professionals work, including peer-to-peer learning and knowledge exchange, also artist-led workshops to co-create, co-initiate or co-design an artwork
- Running artist-led activity or events to highlight the changes that will take place as part of the development, for example working with local school children or colleges to animate a place before construction begins with temporary artworks such as the use of hoardings around a development site
- Holding a celebratory event to open a development or announce the arrival of an artwork, or the start of an event, activity or campaign and creating digital resources in order that the artwork can be more widely accessed regardless of geography and/or has a longer life.

While community participation and/or consultation is an important part of the concept and design stage, implementation focuses on achieving a high-quality artistic outcome informed by the artist's vision in response to the brief. The Public Art Strategy sets out success indicators for collaborative commissions.

Public Art

March 2022



Studio Weave, Ecology of Colour, Dartford, Kent. 2013. Commissioned by Artlands Medway. As part of a project to bring public function to Ecology Island in Central Park, a neglected corner of Dartford, Studio Weave have designed a colourful building to act as custodian for the re-imagined park. The timber-clad structure is an outdoor classroom, workshop, art studio, bird-watching hide, tree house and park shelter all rolled into one. The cladding is decorated with a pattern designed by graphic designers Nous Vous, who ran a series of workshops with a team of local residents to paint the external cladding.



public works, Rotherhithe Public Living Room, London. 2019. Commissioned by Telford Homes and SGN Place. L: Albion Street celebratory day at the Rotherhithe Public Living Room. R: Design workshop with architects, GRID and landscape architects, fabrik at the Rotherhithe Public Living Room.

Public Art

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Commissioning an artist or designer

The commissioning process is set out in detail within the Public Art Commissioning Toolkit - an essential guide to commissioning public art.

The role of the artist in the overall design vision

Contemporary public art involves a diverse range of activities and outcomes. In this guidance the term 'public art' includes 'design' where the elements have been designed by an artist, or a design team involving the creative input of an artist.

For all developments public art should form part of an overall design vision, with concepts being an integral part of a building or its setting.

For larger projects a public art strategy or arts strategy should be produced at the outset, and a public art consultant appointed with the relevant expertise to collaborate with the design team. This is particularly relevant to complex projects and contracts such as infrastructure (using NEC Contracts) or Private Finance Initiative (Design & Build contracts) where experience of costs is required to enable realistic budgets to be set and provide a greater opportunity to consider a range of options and approaches for artists and not be restricted by the budget.

The Public Art Commissioning Toolkit sets out the commissioning process in detail and should be referred to when selecting and commissioning an artist or designer to deliver public art through the planning system. A diagram from the Toolkit demonstrating the Commissioning Process is shown in **Appendix 1**. The Public Art Strategy also sets out guiding principles - a checklist for anyone commissioning public art in Brighton & Hove.

The council is open to working with artists from all backgrounds and does not hold a list of artists to ensure a fair and equitable process of recruitment.

Timescales

This is a major factor in determining the approach to a commission, the type of artist and the level of aspiration. Public art projects have a long lead in time. Artists need to be provided with sufficient time to research and develop their proposals, especially if public engagement is also required. The more time that can be allocated to a public art project, the earlier an artist can be appointed, the better the outcome will be. If the commission is coming through a s106 agreement, then the timescale will need to ensure that proposed submissions are issued to the Planning case officer in good time and in accordance with the terms of the s106 agreement.

Public Art

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Spending the Public Art Developer Contribution

Once a budget for a public art component has been agreed with the planning Case Officer the contribution may be used to cover for example:

- Artist's design fees
- Practitioner/Artist commission fees
- Materials and fabrication costs and fees
- Installation costs

Public art budgets can be used for artists' design fees to enhance other capital elements within a scheme such as landscape design, street furniture, paving, wayfaring, lighting or architectural features to encourage high quality, creative design.



Rona Smith, *An Age, An Instant*, New Burlington Mews, Regent Street, London. 2014. Commissioned by the Crown Estate. With AHMM Architects. The artwork is inspired by the heritage of the Regent Street area in the early 20th century when the area was a hub for clock and watch makers. It takes inspiration from engravings on turn of the century pocket watches and offers a link to the past through a contemporary expression of mechanical time-keeping.

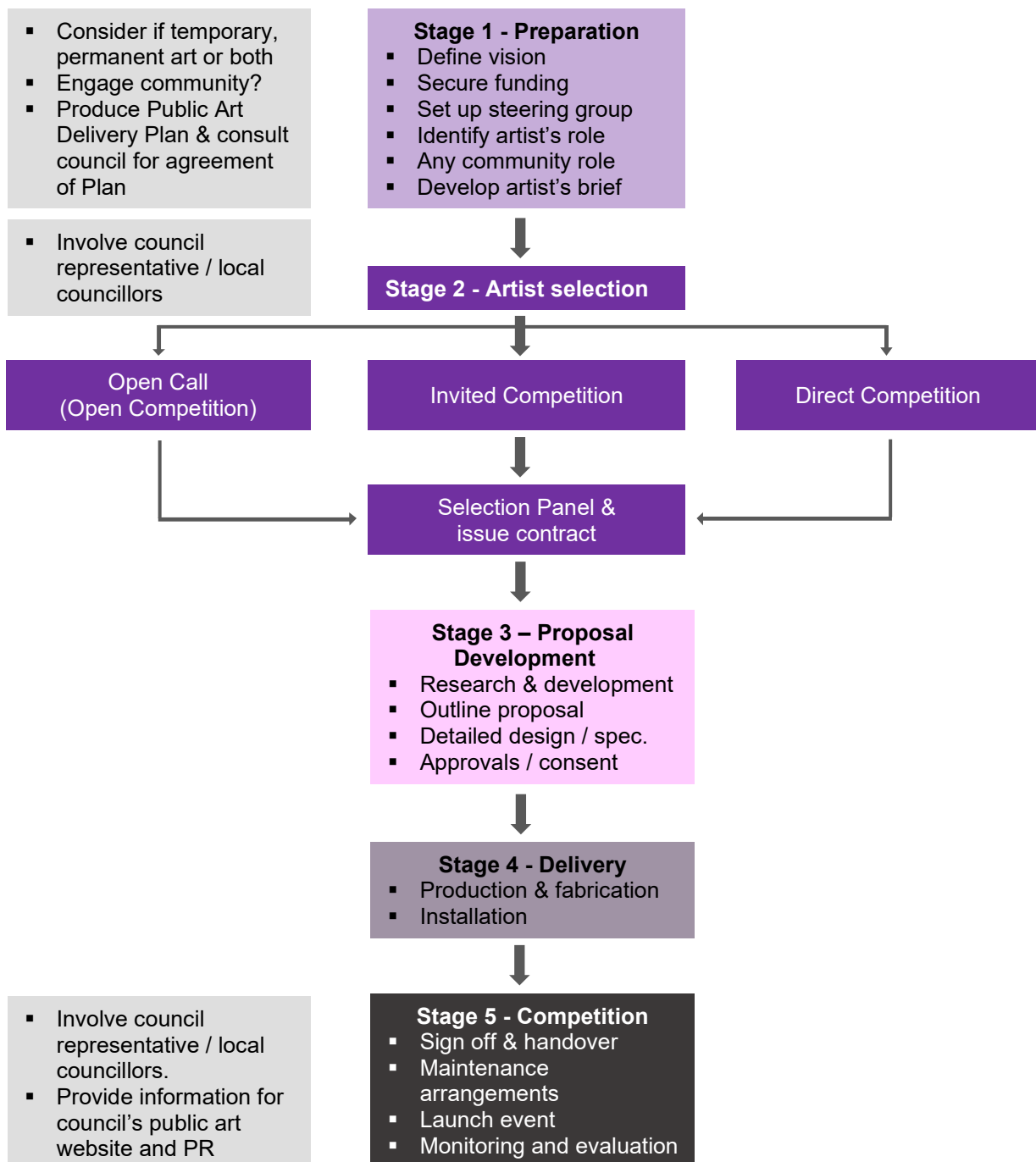
Public Art

March 2022

Appendix 1

Diagram setting out the Art Commissioning Process.

For a comprehensive guide to commissioning public art, please refer to the Public Art Commissioning Toolkit



Public Art

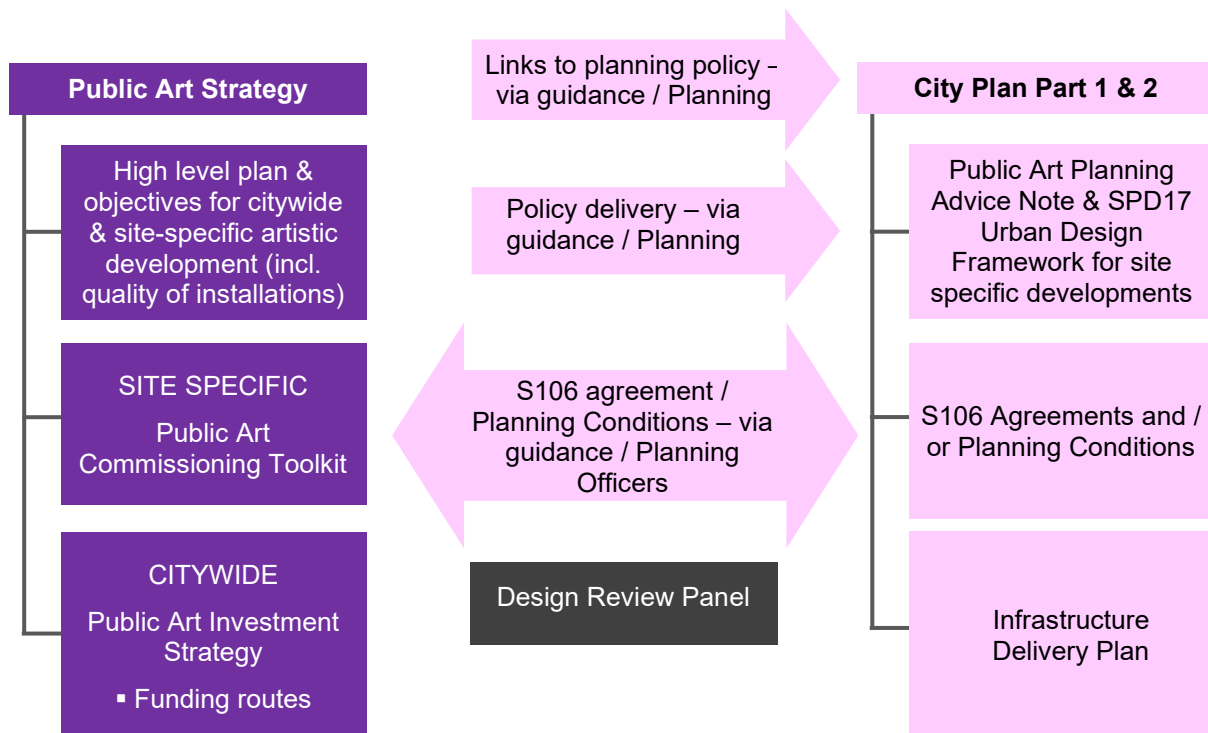
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Appendix 2

Diagram showing links between Planning Documents and The Public Art Strategy & Commissioning Toolkit

Culture, Tourism & Sport

Development / Regeneration



Public Art

March 2022

Appendix 3

Additional Guidance & Resources

A [series of films](#) were commissioned by the council as part of the consultation for the development of the public art strategy which may provide useful context:

- [Places & Spaces](#)
- [Heritage](#)
- [Community & Connectivity](#)
- [A Green City](#)
- [Wellbeing](#)

Film making and sound by Munya Muchati of Thirty 10 Arts. With British Sign Language translation by Sue MacLaine. Produced by Lighthouse and Bridget Sawyers Limited, with assistance from Lighthouse Young Creatives

Public Art

March 2022

Appendix 4

Image Credits

Some of the images and photos displayed in this document are supplied curtesy of Brighton & Hove Council. Copyright of photos/images from other sources is set out below.

Page number	Project and Location	Photo/Image credit
	Belonging Bandstand, touring East Sussex, including East Brighton and Hangleton, Morag Myerscough	Belonging Bandstand — Sussex Community and Morag Myerscough Commissioned by Ditchling Museum of Art and Craft & Brighton Festival Photo @moragmyerscough www.moragmyerscough.com
	An alphabet for Black Rock, Brighton	Commissioned and curated by Bridget Sawyers Limited for Brighton & Hove City Council www.bridgetsawyers.com
	The Wood Street Altarpiece, Walthamstow, Eleanor Hill	Photos © Barney Couch and Miguel Souto www.piphill.co.uk/
	The Open Market, Marshalls Row, Brighton Lucy Williams	www.brightonopenmarket.co.uk
	LookLookLook, Berrington Hall, Herefordshire, Studio Morison	Courtesy of the artists. Photos © Ivan Morison www.morison.info
	Alex Chinneck, A Spring in Your Step, Circus Street Brighton. 2022.	Photography by Marc Wilmot www.alexchinneck.com
	Wind Sculpture, Victoria, London Yinka Shonibare MBE	Photos © Bridget Sawyers www.hsprojects.com
	The Happenstance, Brighton, ALTER	Photos left & centre © Jim Stephenson www.alterandcompany.com/ Photo on right © Bridget Sawyers www.bridgetsawyers.com
	Ecology of Colour, Dartford, Studio Weave	View through leaves, photo © Jim Stephenson Painting workshop, photo © Studio Weave www.studioweave.com
	Rotherhithe Public Living Room, London, Monika Szolle	Curated and commissioned by UP Projects for Telford Homes and SGN Place. Image © Monika Szolle www.upprojects.com
	An Age, An Instant, Regents Street, London Rona Smith	Photos © Billy Sawyers www.ronasmith.co.uk



**Brighton & Hove
City Council**

APPENDIX 2

Developer Contributions Technical Guidance – Calculator and Text for on-site public art provision

‘Other on-site and/or development related provision, facilities and measures’

On-site public art provision within development schemes

The table below sets out the approach to calculating public art provision to be sought from major development proposals towards direct on-site provision of public art

Site Location - CIL Residential Zone *	£ per square metre Gross Internal Area (GIA)
CIL Residential Zone 1	6
CIL Residential Zone 2	4
CIL Residential Zone 3	3

* Where a site falls within a Nil CIL Charge Zone the surrounding CIL residential zone will be applicable, as Nil CIL zones are not excluded from site specific developer contributions.

Thresholds for on-site public art contributions

The minimum sum to trigger a request for the provision of on-site public art will be £25,000. On-site public art developer contributions which fall below this threshold will not be requested. The threshold takes account of the costs of the processes, and the outcomes required and delivered through this provision.

**Developer Contributions Calculator for on-site public art provision
and associated minimum threshold level**

Consultation Report March 2022

Consultation held between 28 October 2021 to 8 December 2021

Contents

Summary

Background

Consultation Methodology

Responses

Council Responses / analysis to issues raised

Developer Contributions Calculator for on-site public art provision and associated threshold level

Summary

The council seeks to introduce an online developer contributions calculator to calculate the appropriate contribution for the provision of on-site public art with an associated threshold level.

The calculator will be included within the council's [Developer Contributions Technical Guidance](#).

Introducing this approach improves the existing process for determining contributions within very large development schemes as it provides a more practical and transparent way to calculate public art developer contributions.

This allows a clear understanding of the costs which may be sought for on-site public art provision at very early stages in the development process.

Background

Developer Contributions Calculator

The calculator is based on an evidenced review of those development schemes within Brighton & Hove which have secured public art contributions as part of their most recent planning approval granted between 2013 – June 2021. The artistic component sums suggested in the calculator are those achieved by the majority (at least 80%) of schemes within their location.

The reviewed schemes were sorted into their location within the existing [CIL \(Community Infrastructure Levy\) charging zones for residential development](#). Using these zones places the proposed contributions within a citywide framework which has been tested through the CIL examination. CIL zones demonstrate broad areas of comparable development viability. Where a site falls within a Nil CIL Charge Zone the surrounding CIL residential zone will be applicable. Nil CIL zones are not precluded from site specific developer contributions such as S106 planning obligations.

To calculate the developer contribution, the scheme's Gross Internal Area (GIA) in square metres is used as a measure to understand the scale and significance of the proposed development, and hence the appropriate scale of the artistic component mitigation requested. Both the CIL residential zone and a scheme's GIA are publicly available information.

Once a sum has been calculated using the Public Art Developer Contribution calculator, the final public art developer contribution will be a matter for the case

officer to test against other developer contributions requirements for the development.

Threshold

The approach also includes an associated minimum threshold of £25,000 for the contribution. Public art developer contribution sums falling below this threshold will not be requested. This threshold reflects the costs of the processes involved in the creation of successful public art; and the material outcomes required including long term durability of the delivered public art.

These costs include:

- Artist's design fees
- Practitioner/Artist commission fees
- Materials and fabrication costs and fees
- Installation costs

Consultation Methodology

An on-line consultation was held on the council's consultation portal for a period of 6 weeks between 28 October 2021 and 8 December 2021.

Emails inviting comments on the consultation were sent to **169** groups and organisations drawn from the planning policy, projects and heritage mailing list and included developers, agents, architects, community and resident groups, forums, civic societies, friends' groups, statutory organisations.

Along with this the Arts and Culture team were asked to forward an email with an invitation to comment on the consultation to their contacts as appropriate.

The Planning Agent's Forum were directly consulted for their views on the consultation.

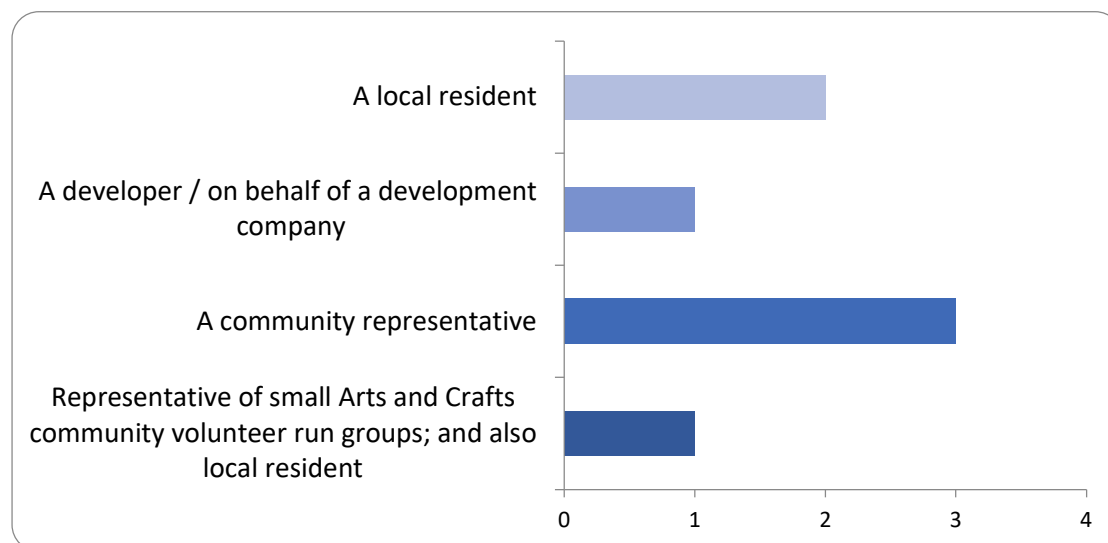
The invitation to comment was also circulated internally to colleagues.

Responses

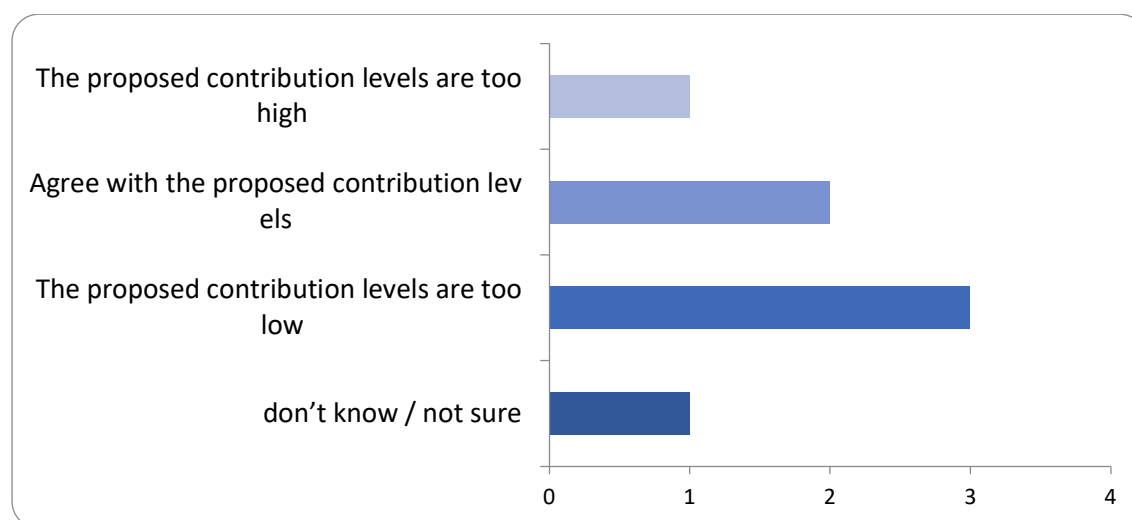
7 responses were received.

5 responses were made fully within the Consultation Portal; 1 response was made within the Consultation Portal and linked to a supplementary emailed response; 1 response was made by email only.

Who Responded



Question: To what extent do you agree or disagree with the proposed developer contribution levels for the provision of on-site public art which may be sought from development schemes?

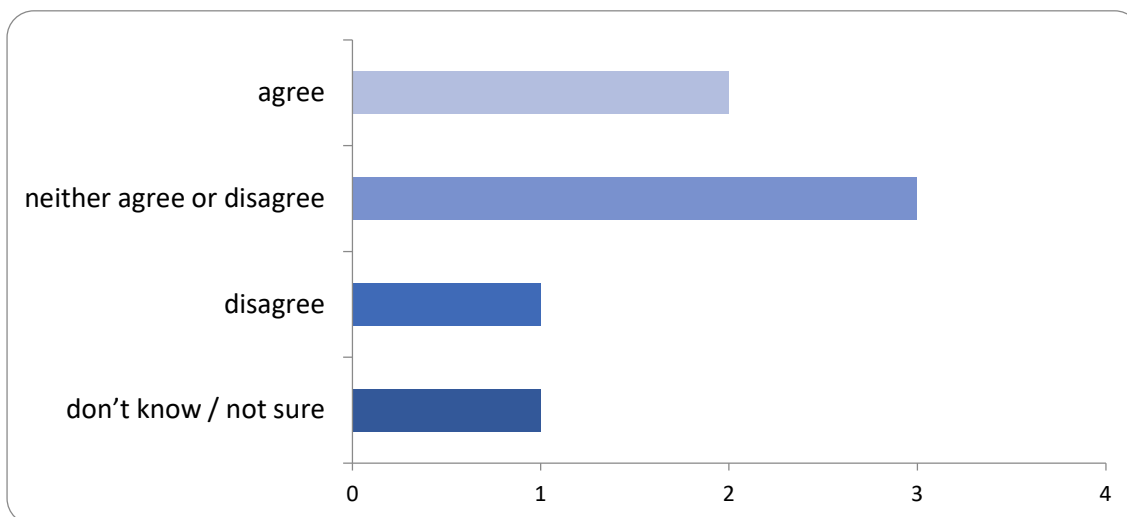


Respondent	General Comment Summary	BHCC Response
Developer	Agrees that public art can help to create and enhance local distinctiveness in the public realm, help develop a desirable sense of place, improve legibility. However this should be developed /	A comprehensive review was undertaken of rates achieved in each CIL charging zone and

	considered on a case-by-case basis to reflect the unique characteristics of each site. Not appropriate to apply a formulaic approach to something that is not formulaic in its nature. Further details of how the rates have been derived are needed, as the tariffs applied would appear to generate disproportionately high sums on major developments.	are considered reasonable, setting out rates which at least 80% of sites achieved. The calculated sum is for the case officer to test against other required developer contributions on a case-by-case basis
A community representative	As your review indicates the figures proposed seem to create numbers that are about what has been agreed in the past. If it was OK then, it should be OK now.	Comment noted and welcomed
A community representative	<p>1)The proposed levels are lower than the average achieved in the period 2013-2021 and would therefore result in a reduction of contributions for on-site public art. The difference is particularly marked for Zone 2 which proposes £4 per sqm GIA compared to recent average £5.4</p> <p>2)The development at the former Texaco Garage, Hove is not included in the review</p> <p>3) the public art scheme at Hove Lagoon is not included in the review</p> <p>3)Recommend a value for money audit of public art projects delivered by s106 funds over last 10 years</p>	<p>Comments noted;</p> <p>1) the proposed contributions reflect past practice and need to be balanced against other contributions</p> <p>2)The former Texaco Garage scheme has now been added to, but does not significantly alter, the review.</p> <p>3) The contribution relating to the Hove Lagoon scheme was secured prior to 2013</p> <p>4) outside the scope of this consultation on Technical Guidance</p>
Arts & crafts & local resident	<p>The quality and scope of the public art across all areas should have the same level of costs and income, and not a three tiered system as the quality of the artists and the relevance to those living there is equal.</p> <p>Central city sites and those who live there are not more important than those living on the urban fringe of the city, and neither should our public art be inferior in costs and design and payments to artists than the city central sites.</p>	Developer Contributions take account of development viability which varies geographically across the city. The review demonstrates the contribution levels achieved historically correspond

	One scale of payments for all sites, depending upon all round development costs.	to viability levels within CIL zones.
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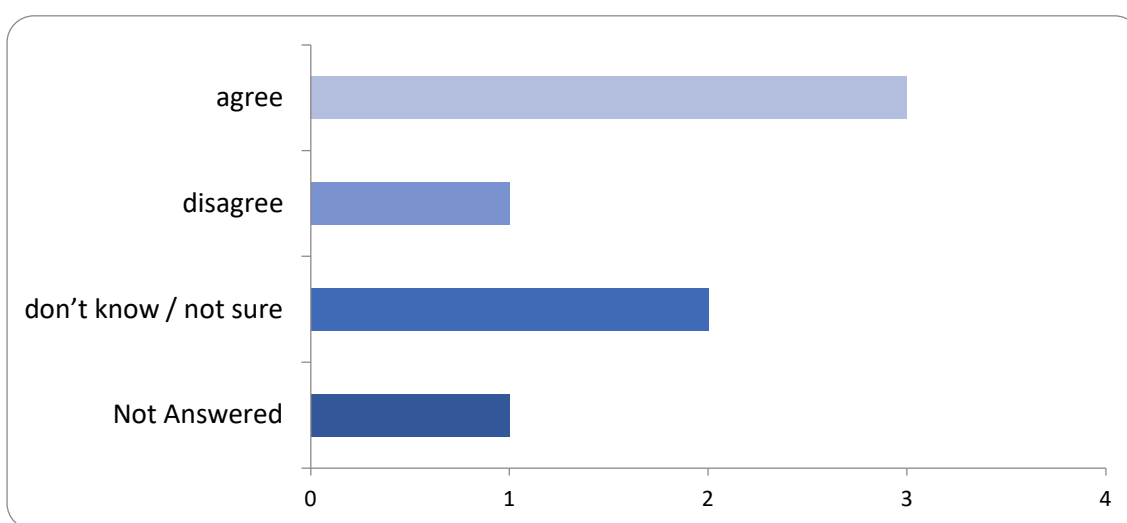
Question: To what extent do you agree or disagree with using the CIL residential zones to define the proposed area boundaries ?



Respondent	General Comment Summary	BHCC Response
Developer	The calculator is based on the CIL zones - we understand this to mean that the proposed calculator does not apply to Nil CIL sites.	Comment noted. Sites within a Nil CIL charging zone are not exempt from relevant S106 contributions. Where a site falls within a Nil CIL Charge Zone the surrounding CIL residential zone is applicable. This will be clarified in a note supporting the calculator
A community representative	The CIL areas seem to reflect the value set by developers on various areas of the city.	Comment noted and welcomed.
Arts & crafts & local resident	<p>1) All areas of the city on the urban fringe to be brought up to central city standards and become destinations for their facilities and public arts, not just places to travel away from.</p> <p>2) To become a vibrant city of the future, several local shopping and arts and cultural hubs needed on</p>	<p>Comments noted.</p> <p>1) Developer Contributions take account of development viability which varies geographically across the city. The review demonstrates the contribution levels</p>

	the urban fringe estates to enable more even travel within the city, and to use every part of the beautiful area and landscapes in rural area, which is currently a wasted resource of our national parks and countryside and urban fringe estates.	achieved historically correspond to viability levels within CIL zones. 2) outside the scope of this consultation
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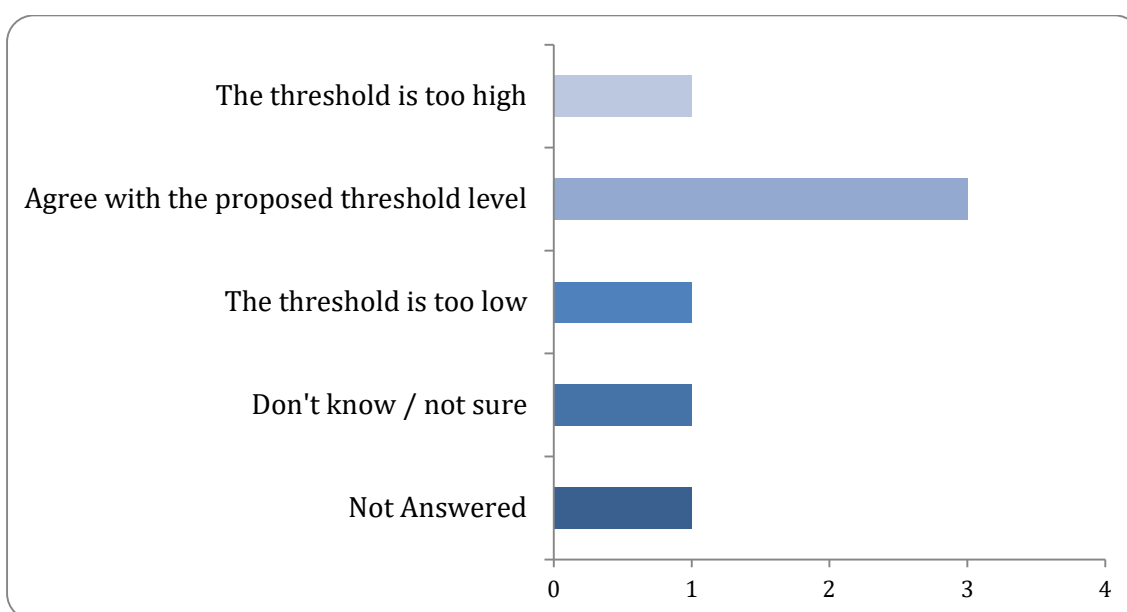
Question: To what extent do you agree or disagree with using the Gross Internal Area (per square metre) of development schemes within the proposed developer contributions calculator



Respondent	General Comment Summary	BHCC Response
A local Resident	It should be based on the valuation of the building to become a progressive contribution.	Comment noted. The calculator uses site size (GIA) and location, so providing a link to general development values
A community representative	The only better measure might have been total building volume, or some sort of measure of overall visual impact. Floor area is close to volume and readily available, whilst a measure of visual impact would be open to criticism on all and any details.	Comments noted. Floor area (GIA) is 1) similar to volume, and 2) publicly available data; leading to its use as a measure to identify the significance and scale of development, which in turn impacts upon the scheme's visual impact.
Arts & crafts & local resident	A difficult question for the uninitiated general public to answer.	Comments noted. The consultation material did provide an explanation of the proposed approach

		<p>but it is acknowledged that some aspects are technical as it will be included in Developer Contribution Technical Guidance.</p> <p>The consultation sought to reach a wide range of groups and organisations with a wide range of interests within the built environment, and the Planning Agent's Forum.</p>
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Question: To what extent do you agree or disagree with the threshold of £25,000 for the provision of on-site public art?



Respondent	General Comment Summary	BHCC Response
A community representative	It might as well be set at this at first sight rather high figure, because the cost of a well designed and long-life artwork will be in thousands, even 10s of thousands, excluding identifying the artist (s) and writing the commissioning document, and seeing through the whole process.	Comment welcomed
A community representative	This seems a reasonable threshold	Comment welcomed

A community representative	The evidenced review shows that for 2013-2021 the total amount achieved for schemes below the proposed £25K threshold was £274,300, a considerable sum that the city would miss out on if this threshold was implemented. Whilst we agree that contributions of less than £25K are too low to provide a substantial single public art contribution, we propose that this money is pooled between schemes to maximise the benefit for the city.	Comment noted. The Developer Contribution Technical Guidance sets out that s106 developer contributions may be sought for on-site public realm provision including artistic element. Where it is not possible for on-site provision, off-site contributions are addressed through CIL
Arts & crafts & local resident	Not enough information given for the general public to comment / have a realistic opinion on this subject.	Comment noted. The threshold is based on detailed processes involved in the creation of successful public art

Review of On-site Public Art contributions achieved between 2013 - June 2021

App No	Site Address	Ward	Application details	GIA in sqm	amount achieved	£ per sqm
BH2013/00715	17-19 21-23 and 37-40 Regency		Demolition of existing buildings at 21, 22 and 23 Brighton Square and demolition of	1,545	12.5k	7.9
BH2013/01575	ENTERPRISE POINT, Hanover & El		Outline application for the demolition of 16-18 Melbourne Street and the construc	4,409	38.5k	8.7
BH2013/03461	Circus Street Developr	Queen's Park	Demolition of existing buildings and their replacement with a mixed use developm	34,809	240k	6.9
BH2013/03926	The Astoria 10-14 Glos	St Peters & N	Demolition of existing Grade II listed building and construction of new building cor	4,550	34k	7.5
BH2014/00922	Hove Park Depot The I	Hove Park	Demolition of existing buildings and construction of a new two storey primary sch	2,902	11.6k	4
BH2014/01431	27-33 Ditchling Road E	St Peters & N	Demolition of existing building and erection of new four storey building (plus base	2,672	20.8	7.8
BH2014/01637	Land 54 Hollingdean R	Hollingbury &	Demolition of all buildings at 54 Hollingdean Road and erection of a part 3, 4, 5 ar	5,507	29.7k	5.4
BH2014/02100	Old Ship Hotel 31-38 K	Regency	Demolition of existing 3 storey garage and staff accommodation block fronting Bl	1,807	14k	7.8
BH2015/04184	Court Farm House Col	Hangleton &	Demolition of existing buildings and erection of 2no three storey blocks (one with	6082	36.5k	6
BH2015/04575	8-12A South Street & 7	Regency	Demolition of garage / storage buildings at 8 - 12a South Street and two storey re	3319	£26k	7.9
BH2015/04577	78 West Street and 7-8	Regency	Demolition of existing nightclub buildings (Sui Generis use). Construction of part	6205	£49.5k	7.9
BH2016/01001	East Slope Refectory F	Hollingbury & -	Demolition of existing buildings and redevelopment to 'East Slope' to create a r	11,546	£30k	2.6
BH2016/05530	Land South of Ovingde	Rottingdean	Outline planning application with appearance reserved for the construction of 45n	6180	£45k	7.3
BH2016/05312	65 Orchard Gardens H	Hove Park	Demolition of existing buildings and erection of a 5no storey building and baseme	2,387	£18.6k	7.8
BH2016/02535	WESTERMAN COMPL	Wish	Outline application for Demolition of existing mixed use buildings and erection of	7871	£37k	5.3
BH2016/02756	The Former Texaco G	Central Hove	Proposed demolition of the former Texaco garage and shop and demolition of out	4321	£42K	9.7
BH2017/01280	Argus House Units 2 &	Patcham	Erection of a new 3 storey, including basement and undercroft, car dealership bui	8300	£23k	2.8
BH2017/02410	Land Off Overdown Ri	North Portsla	Outline application for the erection of up to 125 dwellings with associated access,	11,015	£33k	3
BH2017/02156	2, 3, 4, 5 And 6 Pelhar	Moulsecooml	Demolition of existing buildings and erection of a part 1,6, 8 and 9 storey building	8750	£30k	3.4
BH2017/01891	West Blatchington Prin	Hangleton &	Demolition of existing school buildings. Erection of Primary school and nursery sc	12,152	£24k	2
BH2017/02256	Royal Sussex County	East Brighton	Erection of a 4no storey extension to existing Emergency Department building wit	3,645	£16.4	4.5
BH2017/01108	Site Of Sackville Hotel	Westbourne	Erection of 5 to 8 storey building to provide 60no residential dwellings (C3) (mix o	3506	£19	5.5
BH2017/00662	The Downsman 189 H	Hangleton &	Demolition of former public house (A4) and erection of 33 dwellings (C3) comprisi	3100	£18k	6
BH2017/03566	Brighton Hove And Sus	Hove Park	Erection of a 4no storey teaching block replacing existing temporary modular clas	2823	£19.5k	7
BH2017/04050	35-39 The Droveaway	Hove Park	Change of use from former Dairy Crest depot (B8) to Mixed-use flexible commerc	3511	£21k	6
BH2018/00340	Former Amex House E	Queen's Park	Erection of a mixed use development between 4 and 8 storeys above basement i	28,270	£195k	6.9
BH2018/00868	Kings House BN3 2LS	Central Hove	Demolition of existing office building (B1) fronting Grand Avenue. Conversion of e	8435	£60k	7.1
BH2018/02051	William Moon Lodge /	Hollingdean /	Erection of three storey (plus basement) residential care home providing 88 bedr	3485	£17k	4.9
BH2018/02607	Greater Brighton Metro	St Peters & N	Hybrid planning application comprising: Full Planning application Site A (West of	11,000	£43k	3.9
BH2018/02926	113 - 119 Davigdor Ro	Goldsmid	Erection of a new part 5 storey, part 9 storey building providing 894sqm of office s	5159	£19k	3.9
BH2018/02699	118 - 132 London Roa	St Peters & N	Demolition of existing building to facilitate the erection of a five storey building witi	9276	£72k	7.8
BH2018/03356	Kap Ltd Newtown Roa	Hove Park	Erection of a mixed use redevelopment to provide 148 dwellings (Class C3), 1,10	11153	£62,500	5.6
BH2019/00544	270 Old Shoreham Ro	Hove Park	Demolition of existing buildings (Sui Generis) and the erection of a part 2 storey, p	3841	£19.9k	5.2
BH2019/01272	1 Moulsecoomb Way	Brighton BN2 4	Demolition of existing industrial (recycling), community and residential buildings a	11760	£41k	3.5
BH2019/01820	19-24 Melbourne Street	Brighton BN1	Demolition of existing auto servicing centre and joinery building and erection of a	3902	£29	7.5
BH2019/02948	Sussex County Cricket Ground	Eaton	Hybrid Planning Application comprising: (Phase 1) FullPlanning application for the	7420	£32.75k	4.4
BH2019/02578	Victoria Road Housing Office,	Victoria	Erection of 2no buildings behind Portslade Town Hall, accommodating 42no resid	25000	£25,000	5.1
BH2019/03113	Longley Industrial Esta	St Peters & N	Demolition of existing buildings and redevelopment to provide: 3,333sqm of office	21,569	£83k	3.85
BH2019/03548	Sackville Trading Estat	Hove Park	Demolition and comprehensive redevelopment of Sackville Trading Estate and H	55,250	£300,000	5.4
BH2020/00002	Coombe Farm Westfie	Rottingdean	Demolition of existing buildings and erection o Coombe Farm Westfield Avenue N	7315	£53,400	7.3
BH2020/00011	West Slope University Of	Sussex Le	Demolition of Park Village, Lancaster, York, Kulukundis and Kent Houses (total o	37842	£98,389	2.6
BH2020/01951	Land To The Rear Of	Regency	Redevelopment incorporating demolition of existing buildings on Cannon Place &	6326	£49,900	7.9
BH2020/00917	Units 1-3 Ellen Street	Goldsmid	Demolition of existing buildings and redevelopment to provide a mixed-use schen	18026	£97,340	5.4

43 development sites have included an Artistic Component within a section 106 agreement from 2013 onwards

If a development site has been subject to more than one s106 Artistic Component agreement, only the most recent agreement has been included within this review.

CIL Residential Zone 1

81% of sites in Zone 1 achieved at least £6 per square metre of GIA

App No	Site Address	Ward	Application details	GIA in sqm	amount achieved	£ per sqm
BH2013/00715	17-19 21-23 and 37-40 Brighton Square Brighton	Regency	Demolition of existing buildings at 21, 22 and 23 Brighton Square and demolition	1,545	£12,500	7.9
BH2013/03461	Circus Street Development Former Wholesaler	Queen's Park	Demolition of existing buildings and their replacement with a mixed use development	34,809	£240,000	6.9
BH2013/03926	The Astoria 10-14 Gloucester Place Brighton	St Peters & Church	Demolition of existing Grade II listed building and construction of new building comprising	4,550	£34,000	7.5
BH2014/01431	27-33 Ditchling Road Brighton	St Peters & Church	Demolition of existing building and erection of new four storey building (plus base	2,672	£20,800	7.8
BH2014/02100	Old Ship Hotel 31-38 Kings Road Brighton	Regency	Demolition of existing 3 storey garage and staff accommodation block fronting Brighton	1,807	£14,000	7.8
BH2015/04575	8-12A South Street & 79-81 West Street Brighton	Regency	Demolition of garage / storage buildings at 8 - 12a South Street and two storey rear	3319	£26,000	7.9
BH2015/04577	78 West Street and 7-8 Middle Street Brighton	Regency	Demolition of existing nightclub buildings (Sui Generis use). Construction of part	6205	£49,500	7.9
BH2016/02756	The Former Texaco Garage Site, 133 Kings Road Brighton	Central Hove	Proposed demolition of the former Texaco garage and shop and demolition of outbuildings	4321	£42,000	9.7
BH2017/03566	Brighton Hove And Sussex Sixth Form College	Hove Park	Erection of a 4no storey teaching block replacing existing temporary modular classrooms	2823	£19,500	7
BH2017/04050	35-39 The Drove Way Hove BN3 6LF	Hove Park	Change of use from former Dairy Crest depot (B8) to Mixed-use flexible commercial	3511	£21,000	6
BH2018/00868	Kings House BN3 2LS	Central Hove	Demolition of existing office building (B1) fronting Grand Avenue. Conversion of existing	8435	£60,000	7.1
BH2018/02699	118 - 132 London Road Brighton BN1 4JH	St Peters & Church	Demolition of existing building to facilitate the erection of a five storey building with	9276	£72,000	7.8
BH2020/01951	Land To The Rear Of Hilton Brighton Metropolitan Hotel	Regency	Redevelopment incorporating demolition of existing buildings on Cannon Place &	6326	£49,900	7.9

19% of sites in Zone 1 achieved at least £3.8 per square metre of GIA

App No	Site Address	Ward	Application details	GIA in sqm	amount achieved	£ per sqm
BH2017/01108	Site Of Sackville Hotel 189 Kingsway Hove	Westbourne	Erection of 5 to 8 storey building to provide 60no residential dwellings (C3) (mixed use)	3506	£19,250	5.5
BH2018/02607	Greater Brighton Metropolitan College	Pelham	Hybrid planning application comprising: Full Planning application Site A (West of	11,000	£43,000	3.9
BH2019/03113	Longley Industrial Estate New England Street	St Peters & Church	Demolition of existing buildings and redevelopment to provide: 3,333sqm of office	21,569	£83,000	3.8

TOTAL Amount for CIL Zone 1 £806,450

The average sum received in zone 1 is £7 per square metre GIA

81 % of all artistic component sums in zone 1 achieved a minimum of £6 per square metre GIA

As the Artistic Component is a suggested sum, a requested figure of £6 per square metre of new GIA in Zone 1 is considered appropriate

CIL Residential Zone 2

81% of all artistic component sums in zone 2 achieved a minimum of £4 per square metre GIA

App No	Site Address	Ward	Application details	GIA in sqm	amount achieved	£ per sqm
BH2013/01575	ENTERPRISE POINT, Melbourne Hanover & Elm Gr		Outline application for the demolition of 16-18 Melbourne Street and the construction of a new 3 storey building	4,409	£38,500	8.7
BH2014/01637	Land 54 Hollingdean Road & Hollingbury & Stan		Demolition of all buildings at 54 Hollingdean Road and erection of a part 3, 4, 5 and 6 storey building	5,507	£29,700	5.4
BH2015/04184	Court Farm House Court Farn Hangleton & Knoll		Demolition of existing buildings and erection of 2no three storey blocks (one with basement)	6082	£36,000	6
BH2016/02535	WESTERMAN COMPLEX, St Wish		Outline application for Demolition of existing mixed use buildings and erection of 104 new units	7871	£37,000	5.3
BH2016/05312	65 Orchard Gardens Hove BN Hove Park		Demolition of existing buildings and erection of a 5no storey building and basement car parking	2,387	£18,600	7.8
BH2016/05530	Land South of Ovingdean Road Rottingdean Coast		Outline planning application with appearance reserved for the construction of 45no of new houses	6180	£45,000	7.3
BH2017/02256	Royal Sussex County Hospital East Brighton		Erection of a 4no storey extension to existing Emergency Department building with a basement	3,645	£16,400	4.5
BH2018/00340	Former Amex House Edward & Queen's Park		Erection of a mixed use development between 4 and 8 storeys above basement including parking	28,270	£195,000	6.9
BH2018/02051	William Moon Lodge / Grove & Hollingdean And S		Erection of three storey (plus basement) residential care home providing 88 bedroom	3485	£17,000	4.9
BH2018/03356	Kap Ltd Newtown Road Hove Hove Park		Erection of a mixed use redevelopment to provide 148 dwellings (Class C3), 1,107 sqm of office space	11153	£62,500	5.6
BH2019/00544	270 Old Shoreham Road Hove Hove Park		Demolition of existing buildings (Sui Generis) and the erection of a part 2 storey, part 3 storey building	3841	£19,900	5.2
BH2019/01820	19-24 Melbourne Street Brighton BN2 3LH		Demolition of existing auto servicing centre and joinery building and erection of a new 3 storey building	3902	£29	7.5
BH2019/02948	Sussex County Cricket Ground Eaton Road Hove		Hybrid Planning Application comprising: (Phase 1) Full Planning application for the demolition and comprehensive redevelopment of Sackville Trading Estate and Hove Cricket Ground	7420	£32,750	4.4
BH2019/03548	Sackville Trading Estate And Hove Hove Park		Demolition and comprehensive redevelopment of Sackville Trading Estate and Hove Cricket Ground	55,250	£300,000	5.4
BH2020/00002	Coombe Farm Westfield Ave Rottingdean Coast		Demolition of existing buildings and erection of 72 Coombe Farm Westfield Avenue New houses	7315	£53,400	7.3
BH2020/00917	Units 1-3 Ellen Street Hove BI Goldsmid		Demolition of existing buildings and redevelopment to provide a mixed-use scheme (Class C3) and parking	18026	£97,340	5.4
BH2014/00922	Hove Park Depot The Drove Hove Park		Demolition of existing buildings and construction of a new two storey primary school	2,902	£11,600	4

19 % of all artistic component sums in zone 2 achieved a minimum of £2.6 per square metre GIA

App No	Site Address	Ward	Application details	GIA in sqm	amount achieved	£ per sqm
BH2016/01001	East Slope Refectory Road U Hollingbury & Stan -		Demolition of existing buildings and redevelopment to 'East Slope' to create a mixed use development	11,546	£30,000	2.6
BH2017/01280	Argus House Units 2 & 8 Holli Patcham		Erection of a new 3 storey, including basement and undercroft, car dealership building	8300	£23,000	2.8
BH2018/02926	113 - 119 Davigdor Road Hove Goldsmid		Erection of a new part 5 storey, part 9 storey building providing 894sqm of office space	5159	£19,000	3.9
BH2020/00011	West Slope University Of Sussex Lewes Road F&G		Demolition of Park Village, Lancaster, York, Kulukundis and Kent Houses (total of 85 units)	37842	£98,389	2.6

TOTAL Amount for CIL Zone 2 £1,181,108

The average sum received in zone 2 is £5.4 per square metre GIA

81% of all artistic component sums in zone 2 achieved a minimum of £4 per square metre GIA

As the Artistic Component is a suggested sum, a requested figure of £4 per square metre of new GIA in Zone 2 is considered appropriate

CIL Residential Zone 3

83 % of all artistic component sums in zone 3 achieved a minimum of £3 per square metre GIA

App No	Site Address	Ward	Application details	GIA in sqm	amount achieved	£ per sqm
BH2017/02410	Land Off Overdown Rise I North Portslade		Outline application for the erection of up to 125 dwellings with associated access	11,015	£33,000	3
BH2017/00662	The Downsman 189 Hang Hangleton & Knoll		Demolition of former public house (A4) and erection of 33 dwellings (C3) compris	3100.00	£18,000	6
BH2017/02156	2, 3, 4, 5 And 6 Pelham T. Moulsecoomb Anc		Demolition of existing buildings and erection of a part 1,6, 8 and 9 storey building	8750	£30,000	3.4
BH2019/01272	1 Moulsecoomb Way Brighton BN2 4PB		Demolition of existing industrial (recycling), community and residential buildings	11760.00	£41,000	3.5
BH2019/02578	Victoria Road Housing Office, Victoria Road,		Erection of 2no buildings behind Portslade Town Hall, accommodating 42no resi	25000.00	£25,000	5.1

17% of all artistic component sums in zone 3 achieved a minimum of £3 per square metre GIA

App No	Site Address	Ward	Application details	GIA in sqm	amount achieved	£ per sqm
BH2017/01891	West Blatchington Primar	Hangleton & Knoll	Demolition of existing school buildings. Erection of Primary school and nursery s	12,152	£24,000	2

TOTAL Amount for CIL Zone 3 £171,000

The average sum received in zone 3 is £3.5 per square metre GIA

83 % of all artistic component sums in zone 3 were a minimum of £3 per square metre GIA

As the Artistic Component is a suggested sum, a requested figure of £3 per square metre of new GIA in Zone 3 is considered appropriate

Brighton & Hove City Council

Tourism, Equalities, Communities & Culture Committee

Agenda Item 83

Subject: City Plan Part 2 – Consultation on Modifications arising from Examination Hearings

Date of meeting: 10 March 2022

Report of: Executive Director, Economy, Environment & Culture

Contact Officer: Name: Helen Gregory
Tel: 01273 292293
Email: helen.gregory@brighton-hove.gov.uk

Ward(s) affected: All

For general release

1. Purpose of the report and policy context

- 1.1 This report provides an update on the City Plan Part Two (CPP2) Examination, outlines the next steps and seeks Member agreement to publish a list of main modifications to the Plan for public consultation.
- 1.2 The main role of CPP2 is to support the implementation and delivery of City Plan Part One (adopted March 2016) which sets out the strategic planning framework for the city to 2030. Part Two builds upon and complements the strategic plan and will help facilitate the delivery of high quality, sustainable development by setting out an up to date suite of detailed development management policies and additional site allocations.

2. Recommendations

- 2.1 That Committee agrees the Schedule of Proposed Main Modifications set out in Appendix 1 along with supporting documents (the Sustainability Appraisal and Health and Equalities Impact Assessment) for a seven week period of public consultation;
- 2.2 That Committee notes the schedule of consequential changes that will impact on proposed change to the Policies Map and the schedule of Additional Modifications set out in Appendix 2.

3. Context and background information

- 3.1 Following Council approval 23 April 2020, the Proposed Submission City Plan Two (CPP2) was published for final formal Regulation 19 consultation September – October 2020. The representations received were collated into a Statement of Consultation along with a summary of Main Issues. Appendix 3 provides further details. The CPP2 was submitted in May 2021 to the

Secretary of State for formal examination. An Examination Inspector was appointed in June 2021 to carry out the plan examination. Public hearings were held in November 2021.

- 3.2 The examination started from the basis that the council had submitted a 'sound' Plan (that it met the government's defined tests of being positively prepared, justified, effective and consistent with national policy). In its submission, the Council requested the Inspector to make changes/modifications, as necessary, to address any deficiencies in the soundness of the Plan. This is a standard approach and allows for parts of the Plan which are identified through the examination as unsound to be made sound through modifications to allow it to move forward to adoption. The Inspector has now written to the council indicating a number of proposed changes/main modifications to the Plan may be necessary for her to find it sound and legally compliant. Public consultation on these modifications is required before the Inspector can conclude the examination and issue her final report.

Examination Hearings

- 3.3 Thirteen public hearing sessions took place between 2 and 16 November online via Microsoft Teams Those residents, groups, organisations and other stakeholders who responded to the Regulation 19 consultation in Autumn 2020 were given the opportunity to further participate by responding through participant matter statements to the Inspector's examination matters, issues and questions and / or by appearing at the public hearing sessions.
- 3.4 For the development management policies, the focus of the examination was whether the policies were justified by the evidence, consistent with national policy and the adopted CPP1, whether they would be effective, clearly written and unambiguous for the decision maker.
- 3.5 For the site allocations the Inspector did not consider that revising the city's overall housing requirement (to deliver a minimum of 13,200 dwellings by 2030) was within the scope of the CPP2. The focus was whether the Plan allocates sufficient housing land to deliver *at least* the minimum housing requirement as set out in the adopted City Plan Part 1. For all site allocations, the Inspector looked at how sites and capacity had been identified, how constraints or mitigation requirements had been addressed and the benefits of the development. Additional site-specific questions were posed for a number of the site allocations.
- 3.6 The hearing sessions took the form of online round table discussions led by the Inspector. They were live broadcast via the council's YouTube channel. Public viewing appeared to be largely the same as at 'in person' hearings.
- 3.7 During the hearing sessions participants were given full opportunity to discuss their representations and, where related to matters of soundness, if representations could be addressed by way of main modifications. The Inspector also considered a number of proposed modifications put forward by the council at the submission stage or in response to her matters, issues

and questions. In her Post Hearing Action Points the Inspector asked the council to prepare a revised composite schedule of MMs that would need to be consulted upon.

Schedule of Main Modifications

- 3.8 The Schedule of Main Modifications (MMs) is set out in Appendix 1. The majority of the MMs propose either factual updates or improve the clarity of the wording for the decision maker and ensure policy wording remains consistent with the government's National Planning Policy Framework (NPPF, July 2021). Some MMs are also required to reflect changes to the Use Class Order that came into effect 1st September 2020.
- 3.9 Those MMs that relate to a change in the wording of policies include:
- **DM1 Housing Quality, Choice and Mix** – additional wording in criterion e) to clarify when the council will seek 'wheelchair accessible' homes to reflect planning policy guidance.
 - **DM10 Public Houses** – additional criterion proposed to ensure that where proposals involve loss of floorspace (eg gardens) and facilities ancillary to the operation of a public house, the impact on the future viability of the pub is considered.
 - Revising the **retail policies (DM12-DM16)** to address changes to the Use Classes Order that came into effect 1st September 2020 and the introduction of the single E Use Class Commercial, Business and Service Use. The proposed changes recognise the changing nature of the high street, encourage a range of uses that maintain and enhance the vitality, viability and character of the shopping area, retain active ground floor uses and ensure appropriately designed shop fronts.
 - **DM18 High Quality design and Places** - changes proposed clarify that an artistic element is required to be incorporated in major development on strategic and/ or prominent sites.
 - For a number of **heritage policies (DM26-29)** and relevant Strategic Site Allocations (**SSA 1, 3, 5 and 7**) additional wording to refer to the need for Heritage Impact Assessment and also to refer to the heritage balance considerations as set out in the NPPF.
 - Amending and restructuring parts of **Policy DM37 Green Infrastructure and Nature Conservation** to ensure more robust policy wording regarding the mitigation hierarchy and seeking measurable net gain. Amendments to part C. locally protected sites to clarify and improve the effectiveness of the policy
 - **DM39 Development on the Seafront** – additional wording to refer to the assessment required if development would be likely to have an adverse impact on designated sites including the Beachy Head West Marine Conservation Zone.
 - **DM44 Energy efficiency and renewable energy** – changes proposed clarify the types of development that the standards set out in the policy will apply to and information requirements of applicants. Changes include

reference to the Future Homes Standards and Future Building Standards due to come into effect in 2025 with an interim uplift coming into effect 15 June 2022. These will supersede and exceed DM44.

- **SSA1 Brighton General Hospital** - amended wording to the supporting text, drafted with participants (RSPB, Sussex Ornithological Society and Sussex Wildlife Trust) during the hearings on the need to safeguard, protect and support swift colonies throughout the entirety of development.
- **H1 Housing and Mixed Use Sites** – updates to the tables of site allocations (Tables 6 and 7) will remove 6 sites where housing has now been completed and one site no longer available for development due to its current use (**2-16 Coombe Road**). Two new housing sites put forward during the consultation are proposed to be included (**Land at Preston Road / Campbell Road, Brighton and 154 Old Shoreham Road, Hove**). The removal of the site allocation between **Marine Drive and The Cliff** is proposed as it could not be demonstrated to the satisfaction of the Inspector that the delivery of 10 dwelling units would not have a significant impact on the Local Wildlife Site or that adequate ecological mitigation and biodiversity net gains would be possible.
- **H2 Housing Sites – urban fringe** - modifications propose the deletion of one site: **Site 16 (land at and adjacent to Horsdean Recreation Ground)** in light of updated evidence (UFA Update 2021) that development for 10 dwellings would be unlikely to achieve the required ecological mitigation and biodiversity net gain. A boundary amendment is also proposed to **site 46a Land at former nursery, Saltdean** and a reduction in the potential number of dwelling units from 24 to 18 units to respond to a landowner representation and the need to retain existing vegetation around the northern and western boundaries.
- The Inspector having considered all the evidence, representations, submitted matter statements and the hearing discussions has not asked the council in the Post Hearing Note to make any other changes to the list of H2 urban fringe sites or the housing allocation at Benfield Valley.
- The proposed MMs have been subject to Sustainability Appraisal and Health and Equalities Impact Assessment, and these are summarised in section 9 and 10 of this report. The documents can be viewed on the council's website: ([Examination documents from the council \(brighton-hove.gov.uk\)](https://www.brighton-hove.gov.uk/examination-documents-from-the-council-brighton-hove)). An update to the Habitats Regulation Assessment is not considered to be required with respect to the MMs since they do not increase the cumulative level of development proposed in the Plan.

- 3.14 Consequential changes to how the CPP2 policies and allocations will be shown on the adopted Policies Map have also been prepared and included at a separate schedule in Appendix 2. These supporting documents will be available as part of the consultation.
- 3.15 As part of the examination process a number of proposed Additional (Minor) Modifications have been identified (factual updates or editorial corrections). These additional modifications, included in Appendix 2 are not subject to the formal examination and address minor issues of clarity and will be published

for completeness. Comments on the schedule of Additional Modifications will only be considered by the council and not by the Inspector.

4. Analysis and consideration of alternative options

- 4.1 The CPP2 is still under examination – the Inspector’s post hearing note does not represent her full findings on the matters raised. Consultation on the proposed Main Modifications is necessary to inform her final consideration on whether the plan can be found sound and is the only practicable option if the Plan is to progress towards adoption and ensure the council has an up-to-date set of development management policies and site allocations to support the City Plan Part One (CPP1).
- 4.2 Without public consultation on the Main Modifications the Inspector would not be able to conclude the examination of the Plan. If consultation on the Main Modifications requested by the Inspector is not approved the council would need to go back several stages in the City Plan Part Two preparation at significant financial cost and time delay. It would also impact on the review of the City Plan Part 1 which is due to commence this year.

5. Community engagement and consultation

- 5.1 Three phases of consultation have taken place to inform the preparation of the City Plan Part 2 (Issues and options consultation in 2016, draft Plan consultation in 2018 and formal soundness consultation in 2020) with full details set out in published Statements of Consultation. The May 2021 Statement of Consultation details the consultation undertaken on the Proposed Submission City Plan Part Two in 2020, the consultation responses received through formal written representations and provides a summary of main issues and officer response.
- 5.2 Consultation on the Schedule of proposed Main Modifications will be for a period of seven weeks. Consultation will take place in accordance with the council’s adopted Statement of Community Involvement (SCI) and temporary addendum which sets out policy and standards for engaging residents, local groups, stakeholders and statutory consultees in the preparation of planning-related documents, including supplementary planning documents.
- 5.3 Those who made representations at the previous Regulation 19 consultation and Planning Policy consultees will be notified by email of the details of the consultation; where documents are available to view (online and hard copies at the libraries and Brighton Customer Service Centre) and how and when to make comments. The CPP2 Examination webpage will be updated and press and social media will be used to advertise the consultation.
- 5.4 The Inspector has specified that the consultation relates solely to the proposed Main Modifications. It is not an opportunity to re-open debate on matters that the Inspector has already considered or on parts of the Plan not subject to main modifications.

- 5.5 Following consultation, the representations received will be collated and forwarded to the Inspector along with a summary of main issues raised. She will consider these representations and, if no issues arise from the consultation on the main modifications, then write her final Report on the Examination of the CPP2.

6. Conclusion

- 6.1 The City Plan Part 2 is still under examination by a government appointed Inspector. This report provides an update on the CPP2 examination and seeks Member approval to publish the Schedule of Main Modifications to the Plan as requested by the Inspector for public consultation.
- 6.2 The Inspector has indicated that consultation on these Main Modifications is necessary to inform her consideration on whether the plan can be found sound / or how it could be made sound by main modifications. Public consultation will ensure the Inspector is able to conclude her consideration and examination of the Plan. This is the only practicable option if the Plan is to progress towards adoption.
- 6.3 It is important that the Council has a complete, up to date and robust planning policy framework. Whilst the City Plan Part One provides the overarching strategic planning framework for the city, including the eight Development Areas and 23 strategic allocations, it does not allocate all of the sites that will be required to meet the city's identified needs such as housing. Nor does it include a full set of up-to-date detailed development management policies to guide future development in the city.

7. Financial implications

- 7.1 There are no direct financial implications arising from this report. The cost of officer time, document production and consultation associated with the recommendations in this report will be funded from existing revenue budget within the Planning service. Any significant variations to budget will be reported as part of the council's monthly budget monitoring process.

Finance Officer Consulted: John Lack

Date consulted: 03/02/22

8. Legal implications

- 8.1 Section 20 of the Planning and Compulsory Purchase Act 2004 allows the person carrying out an independent examination of a development plan to recommend "main modifications" to the plan to make it sound. The local planning authority must publish the recommendations and the reasons for the same. Section 23 of the Act provides that where main modifications are recommended the plan may only be adopted with those main modifications or with those modifications and any additional modifications if the additional modifications do not materially affect the policies in the plan.

Lawyer Consulted: Hilary Woodward:

Date consulted 31/01/22

9. Equalities implications

- 9.1 The Plan will help deliver equalities outcomes from new development. A Health and Equalities Impact Assessment (HEQIA) has been carried out on the draft City Plan Part 2 and revisited to consider the Main Modifications to ensure that the policies are coordinated to address equalities, health and well-being outcomes throughout the city. This is set out in an addendum to the HEQIA. The HEQIA concludes that CPP2 represents a comprehensive and inclusive suite of policies geared to fostering a healthy, vibrant, cohesive and sustainable population. The plan addresses various health objectives, with certain policies specifically addressing some of the health needs of people with protected characteristics, including disabled, BME, LGBTQ+, younger and older people.

10. Sustainability implications

- 10.1 A Sustainability Appraisal (SA) incorporating the requirements of Strategic Environmental Assessment (SEA) has been prepared to inform and support the City Plan Part Two. This included assessment of options at draft stage to ensure the Plan is the most sustainable approach and will therefore support the delivery of sustainable development and outcomes. The SA also tested the suitability of site allocations and policies against the principles of sustainable development. The SA has assessed the proposed Main Modifications to the City Plan Part 2 and concludes that the plan provides a policy framework that seeks to avoid, reduce and mitigate the risk of any adverse effects, thereby resulting in positive social, economic and environmental effects overall. The Plan contributes positively to delivering a Carbon Neutral City by 2030.

11. Other Implications

Social Value and procurement implications

- 11.1 Within respect to Policy DM45 Community Energy, developers of medium scale and major development schemes are encouraged to actively seek community energy partners to deliver low carbon energy solutions which are 'led by' or 'meet the needs' of communities through full community ownership and control of a low carbon energy solution or project and that can add social value.
- 11.2 There are no procurement implications.

Crime & disorder implications:

- 11.3 During the preparation of the City Plan Part 2 the site assessment and sustainability assessment process has considered crime and disorder issues. A number of policies also address crime and public safety issues (DM8, DM18, DM20, DM23, DM24, and DM40).

Public health implications:

- 11.4 A HEQIA assessment has been carried out to inform the draft version of the City Plan Part Two to ensure that the policies are co-ordinated to address health and well-being outcomes throughout the city and revisited to consider the proposed Main Modifications to the policies to ensure that the policies are coordinated to address equalities, health and well-being outcomes throughout the city. This is set out in an addendum to the HEQIA.

Supporting Documentation

1. Appendices

1. Schedule of Main Modifications
2. Schedules of Additional Modifications
3. Further Details of Regulation 20 Consultation and Submission

2. Background documents

1. 23 April 2020 Full Council Report – Proposed Submission City Plan Part 2 ([Brighton & Hove City Council - Agenda for Council on Thursday, 23rd April, 2020, 4.30pm \(brighton-hove.gov.uk\)](#))
2. Inspector Note 9 Post Hearing Action Points 3 December ([Examination documents from the Inspector \(brighton-hove.gov.uk\)](#))

Appendix 3 Further Details of the City Plan Part 2 Regulation 20 Consultation and Submission Stage

1. Following Council approval in April 2020 of the Proposed Submission CPP2 for consultation, the Plan was published for formal (Regulation 19) consultation September – October 2020. The consultation focused on whether the Plan had complied with legal requirements and met the government's tests of soundness as set out in paragraphs 35 -36 of the National Planning Policy Framework (whether the Plan is positively prepared, justified, effective and consistent with national policy).
2. 272 respondents making 810 representations and 4 petitions were received with over 1000 signatures each relating to Urban Fringe sites. A number of comments were also made to supporting documents. A break-down of number of representations by policy are included in at the end of this Appendix along with further detail on the breakdown of representations by site with respect to Policy H2 Housing Sites - Urban Fringe.
3. A summary of the main issues raised is available to read in the Statement of Consultation made available as part of the Examination Library on the council website: [Submission documents \(brighton-hove.gov.uk\)](https://www.brighton-hove.gov.uk/submission-documents) [document SD09ai appendix 9].
4. Many representations did not raise significant soundness issues and sought changes to policies to address issues of clarity. Other representations sought policies to be further strengthened (e.g. from amenity or wildlife groups) or made less onerous (e.g. from planning agents and planning consultants) or to be updated to reflect the 1st September 2020 Use Class Order changes.
5. The policies that attracted the most representations numerically were:
 - **H2 Housing Sites - Urban fringe** - 169 representations from residents, local environmental and wildlife groups. These included general objections to the allocation of any urban fringe sites on grounds of environmental/ amenity value and/or that housing targets can be met on brownfield sites alone. Specific objections to urban fringe site allocations that included local designations. Specific objections to some sites, in particular Land at Whitehawk Hill; the 2 stables sites on Warren Road (Land north of Warren Road Ingleside Stables and Land at South Downs Riding School & Reservoir Site) and to Benfield Valley and the 2 sites in Patcham (Land at and adjoining Horsdean Recreation Ground and Land at Ladies Mile, Carden Avenue). A small number of landowner/promoter representations sought to increase housing numbers on allocated sites.
 - **DM37 Green Infrastructure and Nature Conservation** - 71 representations largely from residents and local environmental/ wildlife groups objecting that the wording of the policy did not adequately reflect the (Habitats Regulations) mitigation hierarchy requirements or provide adequate protection for nationally and locally designated sites.

- **DM38 Local Green Space** - 64 representations from residents, local environmental and wildlife groups including Friends of Whitehawk Hill. Objections sought the designation of one or more additional sites as Local Green Space, with the vast majority seeking the designation of Whitehawk Hill as Local Green Space.
- **SA7 Benfield Valley** - 27 representations from residents, The Benfield Valley Project and local environmental/wildlife groups objecting to the allocation of part of the site for housing. Representation from Benfield Valley Investments Ltd sought to extend the developable area and increase the amount of housing.
- **H1 Housing and Mixed Use Sites** - 28 representations largely from landowners/developers seeking changes to the numbers of units/ range of uses permitted.

Submission

6. All the representations were collated and forwarded to the Secretary of State when the Plan was submitted for examination in May 2021.
7. As part of preparation for the examination, an update to the Urban Fringe Assessment background evidence was undertaken by consultants to address representations received at the 2020 consultation. The consultant (LUC) reviewed representations relating to specific sites where ecology issues had been raised. The work also updated the ecological assessments for specific sites where ecology was raised as a specific concern. The update took account of recent changes in legislation and planning policy including the forthcoming mandatory requirement to achieve biodiversity net gains. The study was made available as part of the Examination Library when the Plan was submitted, and the recommendations discussed at the hearing sessions.

Number of Representations by Policy

Policy	Total Reps
DM1	24
DM2	7
DM3	6
DM4	10
DM5	8
DM6	9
DM7	9
DM8	12
DM9	7
DM10	6
DM11	7
DM12	8
DM13	8
DM14	7
DM15	5
DM16	4
DM17	8
DM18	15
DM19	17
DM20	8
DM21	8
DM22	16
DM23	4
DM24	5
DM25	6
DM26	13
DM27	7
DM28	6
DM29	6
DM31	5
DM32	5

Policy	Total Reps
DM33	17
DM34	11
DM35	8
DM36	7
DM37	71
DM38	64
DM39	8
DM40	9
DM41	5
DM42	8
DM43	8
DM44	10
DM45	1
DM46	2
SA7	27
SSA1	12
SSA2	4
SSA3	21
SSA4	6
SSA5	5
SSA6	3
SSA7	10
H1	28
H2	169
H3	6
E1	3
Supporting Documents	12
Total	810

Number of Representations received to H2 Urban Fringe Housing Sites

H2 – Housing Sites – Urban Fringe	No. Representations ¹
ALL SITES (listed under H2)	26
Land at <u>Oakdene</u> , Southwick Hill / <u>Land</u> West of Mile Oak Road, Portslade	8
Land at Mile Oak Road, Portslade	7
Land off <u>Overdown Rise</u> , Mile Oak, Portslade	7
Benfield Valley	27
Land at and adjoining <u>Horsdean Recreation Ground</u> , Patcham	42
Land at Ladies Mile, Carden Avenue	34
Land to north east of <u>Coldean Lane</u>	20
Land north of Varley Halls, <u>Coldean Lane</u>	22
Land at and adjoining Brighton <u>Race Course</u>	71
Land at South Downs Riding School & Reservoir Site	62
Land north of Warren Road (<u>Ingleside Stables</u>)	66
Land at <u>Ovingdean Hall Farm</u> & Land at <u>Bulstrode</u> / <u>Ovingdean Farm</u>	8
Land adjacent to <u>Ovingdean and Falmer Road</u> , <u>Ovingdean</u>	5
Land at former nursery, Saltdean	6
Cluster at Coombe Farm and Saltdean Boarding Kennels, Westfield Avenue North, Saltdean	3
Land west of Falmer Avenue, Saltdean	4

¹ Please note respondents may have ticked one site or several sites or their representation was made to all the sites listed in H2. |

BHCC44 Revised Schedule of Proposed Main Modifications to the Proposed Submission City Plan Part 2

1. The Proposed Submission City Plan Part 2 was submitted to the Secretary of State on 13 May 2020. Public hearings were held in November 2021.
2. As part of the examination process a number of proposed Main Modifications (MMs) have been identified. A Main Modification is an amendment which is considered necessary to make the Plan sound or legally compliant, addressing issues raised during the examination process and those set out in Inspector Note 09.
3. This schedule identifies the proposed Main Modifications. These Main Modifications have been drafted by the council, and the Planning Inspector has indicated the council can now publish these for public consultation. These MMs are accompanied by an Update Sustainability Appraisal (BHCC45) and Health and Equalities Impact Assessment (BHCC47).
4. The proposed main modifications are generally expressed in the form of ~~strike through~~ for deletions of text and underlined for additions of text and are set out in the same order as the City Plan Part 2.

Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification
MM01	Policy DM1 Page 13	<p><i>DM1 Housing Quality, Choice and Mix</i> <i>Amend policy criterion e) to read:</i></p> <p>e) for proposals providing 10 or more dwellings, 10% of the affordable residential units and 5% of all the residential units should be suitable for occupation by a wheelchair user in accordance with Building Regulation M4(3)⁹. <u>Where the Council is responsible for allocating or nominating the occupier, these homes should be 'wheelchair accessible' at the point of completion, whilst in other cases they may be 'wheelchair adaptable'</u>. Where this is not practicable on-site an equivalent financial contribution should be provided¹⁰; and</p> <p>⁹ Building Regulations M4(3) or as amended. ¹⁰ PartM4(3) - the extra cost per dwelling to provide was assessed in the CIL Viability Study (2017) to be £26,816 for houses and £15,691 for flats. These figures will form the basis for any financial contribution for off-site provision, taking into account inflation. The council will publish updated Technical Guidance on Developer Contributions following the introduction of CIL.</p>	To reflect Part M4(3) of the Building Regulations and Planning Practice Guidance on Housing: Optional Technical Standards (paragraph 56-009).

Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification
MM02	Policy DM3 page 20	<p>DM3 Residential conversions and the retention of smaller dwellings <i>In footnote 1 to the policy, amend first sentence to read:</i></p> <p>¹The original floor area excludes later additions such as extensions, garages (including converted garages) and loft conversions <u>since the dwelling was built or as built on 1st July 1948</u>. The calculation of the original floor area must be based on internal dimensions only.</p>	To clarify and simplify the policy criteria of 'original floor area' and to be consistent with the definition of original dwelling in The Town and Country Planning (General Permitted Development) Order 2015 as amended.
	Policy DM3, page 20	<p>DM3 Residential conversions and the retention of smaller dwellings <i>In part B, insert footnote after 'minimum of two bedrooms' to read:</i></p> <p><u>*i.e., a 2-bedroom, 4-person unit (70sqm) or larger.</u></p>	To clarify what is meant by 'suitable for family accommodation' for policy purposes.
MM03	Policy DM4, page 23	<p>Policy DM4 Housing and Accommodation for Older Persons <i>Amend second paragraph to read:</i></p> <p>Development proposals to meet the specific accommodation needs of older people will be supported <u>Planning permission will be granted for older persons housing and accommodation where the development meets all of the following criteria:</u></p>	To ensure the policy wording is clear and unambiguous.
	Policy DM4, page 23	<p>Policy DM4 Housing and Accommodation for Older Persons <i>Amend fourth paragraph to read:</i></p> <p>Proposals that will result in the loss of residential accommodation for older people will be resisted unless it can be <u>only be permitted</u> where it is demonstrated that at least one of the following criteria apply:</p>	To ensure the policy wording is clear and unambiguous.

Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification
	Supporting text to Policy DM4, paragraph 2.28, page 25	DM4 Housing and Accommodation for Older Persons <i>Amend paragraph 2.28, third sentence to read:</i> The availability of a range of suitable accommodation options for older people, <u>including as part of inter-generational communities</u> , can help release family accommodation, improve quality of life and reduce the need for residential care.	To provide support for the principle of inter-generational housing
	Supporting text to DM4 Paragraph 2.36 page 36	DM4 Housing and Accommodation for Older Persons <i>Amend the final sentence in the fourth bullet point in paragraph 2.36 to read:</i> Extra-care/assisted living homes normally fall either within Use Class C2 or C3, this varies <u>may vary</u> depending on the level of care provided and whether overnight care is available <u>the scale of communal facilities provided</u> .	To ensure consistency with national planning practice guidance (Ref ID: 63-014-20190626)
MM04	Policy DM5, page 28	Policy DM5 Supported Accommodation (Specialist and Vulnerable Needs) <i>Amend second paragraph to read:</i> Proposals for development aimed to meet the specific accommodation requirements of people with specialist needs will be permitted <u>Planning permission will be granted for supported accommodation for people with specialist and vulnerable needs</u> where the development meets all of the following criteria:	To ensure the policy wording is clear and unambiguous.
	Policy DM5, page 28	Policy DM5 Supported Accommodation (Specialist and Vulnerable Needs) <i>Amend third paragraph to read:</i> Proposals that will result in the loss of residential accommodation for people with special needs will be resisted unless it can be <u>only be permitted where it is</u> demonstrated that at least one of the following criteria apply:	To ensure the policy wording is clear and unambiguous.
MM05	Supporting text to Policy DM8, paragraph 2.77	DM8 Purpose Built Student Accommodation <i>Amend last sentence of paragraph 2.76:</i>	To provide clarity on the meaning of the policy requirement for

Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification
		<p>In order to provide a greater strategic benefit to the city developments should provide a predominance at least 50% of bedspaces in the form of cluster flats in order to be available to a broad spectrum of students, rather than only the wealthiest.</p> <p><i>Delete the following text in paragraph 2.77:</i></p> <p>“The majority of new PBSA developments in recent years have been located along the Lewes Road academic corridor due to the accessibility to the universities. Some of these locations are in areas not covered by Controlled Parking Zones so the council cannot restrict the number of cars brought to the city by occupants through permit free developments.”</p>	<p>predominantly cluster units.</p> <p>To reflect the council no longer using planning conditions to restrict access to parking permits.</p>
MM06	Policy DM9, page 40	<p>DM9 Community Facilities <i>Amend part 1 of policy to read:</i></p> <p>1. Planning permission will be granted for new community facilities <u>in Regional, Town, District and Local Centres in accordance with Policy DM12 and in other locations</u> where all of the following criteria are met:</p>	To ensure consistency with Policy DM12
MM07	Supporting text to Policy DM9, paragraph 2.79 pages 40 -41	<p>DM9 Community Facilities <i>Amend the bullet points in paragraph 2.79 to read:</i></p> <p>2.79 The term ‘community facilities’ encompasses a wide range of facilities and services which are defined in national policy as being social, recreational and cultural in nature. They can be broadly separated into the following types of use:</p> <ul style="list-style-type: none"> • <u>Medical or health services (use class E(e));</u> • <u>Creche, day nursery or day centre (use class E(f));</u> • <u>Learning and non-residential Institutions (Use Class F1 D1) – these are defined by the Use Classes Order and include education uses (non-residential), health clinics/GP surgeries, day</u> 	To ensure consistency with changes to the Use Classes Order, as amended pursuant to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 and for added clarity and brevity.

Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification
		<p>nurseries/creches, law courts, training centres, museums, public libraries, public halls and places of worship;</p> <ul style="list-style-type: none"> • <u>Local community uses (use class F2) – isolated local shops selling essential goods, halls or meeting places for the principal use of the local community. Areas of outdoor sport or recreation, swimming pools and skating rinks also fall within the F2 use class, and are protected by City Plan Part One Policy CP17;</u> • <u>Essential community public sector infrastructure including to meet the needs of the city. This includes:</u> <ul style="list-style-type: none"> ○ Facilities for the emergency services including the NHS and Fire, Police and Ambulance Services; ○ Public toilets; and ○ Prison and custody facilities. • Cultural and social facilities which perform an important role in the health and wellbeing and ‘quality of life’ of the city’s residents. Arts and performance venues. These include theatres, cinemas, public houses, social clubs, night time venues, bingo halls, and sport facilities. These types of venue are already protected by City Plan Part One Policy CP5. • <u>Public houses. These are protected by Policy DM10.</u> <p><u>Some changes of use fall under permitted development and would not be covered by the scope of this policy, however it is considered important to maintain a range of community facilities by applying this policy where permitted development rights do not apply.</u></p>	
MM08	Policy DM10, page 42	<p>DM10 Public Houses</p> <p><i>Amend sentence of policy as follows:</i></p> <p>Public houses will be protected.</p> <p><u>1. Planning permission will not be granted for development that would result in the loss of a pub redevelopment and/or change of use except where:</u></p>	To ensure the policy wording is clear and unambiguous.

Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification
		<p>a) it has been demonstrated that use as a public house is not economically viable now and could not be made viable in the future³⁸; and</p> <p>b) It has been demonstrated that the local community no longer needs the public house and alternative provision meeting a similar need is available in the locality.</p>	
	Policy DM10, page 42	<p>DM10 Public Houses <i>Insert new Part 2:</i></p> <p><u>2. Proposals involving the loss of floorspace (including external areas) and facilities ancillary to the operation of the public house, will not be supported where the operation or customer appeal of the public house will be adversely affected.</u></p> <p>Where an alternative use can be justified, priority will be given to re-use of the premises or site for alternative community facilities.</p>	To reflect the discussion at the hearing session regarding protection against losses of floorspace or facilities that could adversely affect the future viability of the pub.
	Supporting Text to Policy DM10, para. 2.85, page 42	<p>DM10 Public Houses <i>Amend paragraph 2.85 with an additional sentence at the end to read:</i></p> <p>Public houses are important contributors to the character and vitality of communities, providing opportunities for social interaction, strengthening social cohesion and acting as a focus for the local community. <u>Proposals for new or extended public houses will be assessed using Part 1 of Policy DM9.</u></p>	To ensure clarity on relevant policy that would apply in circumstances of proposals for new/ extended public houses.
	Supporting Text to Policy DM10, para. 2.93, page 44	<p>DM10 Public Houses <i>Insert new paragraph after 2.93:</i></p> <p><u>The partial loss of a public house including ancillary facilities such as outdoor amenity spaces, covered shelters, dining areas, gardens and visitor accommodation can be detrimental to character, attractiveness to customers and consequently future viability, potentially leading to a pub being lost altogether. In determining whether the proposed changes are acceptable, the</u></p>	To reflect the discussion at the hearing session regarding protection against losses of floorspace or facilities that could adversely affect the future

Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification
		<u>Council will consider the likely effect on the public house's continuing ability to operate successfully and to attract customers.</u>	viability of a public house.
MM09	Policy DM11, page 45	<p>DM11 New Business Floorspace <i>Amend Policy DM11 to read:</i></p> <p>Development proposals involving the provision of new B1a, b and c <u>E(g) (i), (ii) and (iii)</u> Use Class business floorspace, either in stand-alone commercial or mixed-use schemes, should provide for well-designed buildings and layouts suitable for incorporating a range of unit sizes and types that are flexible, with good natural light, suitable for sub-division and configuration for new B1 <u>E(g)</u> uses and activities; and for new B1c <u>E(g) (iii)</u> light industrial, B2 industrial and B8 storage and warehousing premises include adequate floor to ceiling heights; floor loading, power, servicing and loading facilities.</p> <p>Redevelopment proposals on protected industrial estates will be supported where they provide an efficient use of the site/ premises to provide higher density and flexibly designed business premises for B1 <u>E(g)</u>, B2 and/or B8 uses in accordance with City Plan Part 1 Policy CP3 Employment Land</p>	To ensure consistency with changes to the Use Classes Order, as amended pursuant to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020
	Supporting text to Policy DM11, pages 45 -47	<p>Policy DM11 New Business Floorspace <i>Amend paragraph 2.97, first sentence to read:</i></p> <p>Flexible design features for new B1a <u>E(g)(i)</u> office floorspace include:</p> <p><i>Amend paragraph 2.98, first sentence to read:</i></p> <p>Where new B1b <u>E(g)(ii)</u> or B1c <u>E(g)(iii)</u> units are proposed the council...</p> <p><i>Amend paragraph 2.100, first sentence to read:</i></p>	To ensure consistency with changes to the Use Classes Order, as amended pursuant to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020

Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification
		<p>Proposals that provide mix of B-E(g), B2 and B8 use class employment uses must be designed to demonstrate there is adequate separation of uses, to ensure high standards of amenity.</p> <p><i>Amend paragraph 2.102, fourth sentence to read:</i></p> <p>Where opportunities for redevelopment of older/ poor quality/ lower density industrial premises come forward on safeguarded industrial estates/ business parks, in accordance with CPP1 Policy CP3 Employment Land, the council will seek a mix of flexibly designed unit sizes suitable for a range of B1 E(g), B2 and B8 uses making efficient use...</p>	
MM10	DM12, pages 48-49	<p><i>DM12 Changes of Use within Regional, Town, District and Local Shopping Centres</i></p> <p><i>Amend Policy DM12, including name to read:</i></p> <p>DM12 Changes of Use within Regional, Town, District and Local Shopping Centres</p> <p>To allow for diversification in shopping centres, change of use of an existing class A1 unit to non-A1 town centre uses within the following designated shopping centres and as shown on the Policies Map, will be permitted where the following criteria are met;</p> <p>A) Regional, Town and District Shopping Centres</p> <p>i) Changes of use of a ground floor Class A1 unit in the primary shopping frontages will only be permitted where the proportion of Class A1 units would not fall below 75% in the Regional Centre, and 50% in Town and District Centres (as a proportion of total units measured across the total Primary Shopping Frontage), taking into account unimplemented planning permissions for changes of use;</p> <p>ii) Changes of use of a ground floor Class A1 unit in the secondary shopping frontages will only be permitted where the proportion of Class A1 units would not fall below 35% in the Regional Centre and below 30% in the Town and District Centres (as a proportion</p>	<p>To ensure consistency with changes to the Use Classes Order, as amended pursuant to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020</p> <p>To rectify error in tracked change version discussed at hearing session where text was repeated (see BHCC40).</p>

Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification
		<p>of total units measured across the total Secondary Shopping Frontage), taking into account unimplemented planning permission for changes of use.</p> <p>iii) Within the Lanes and North Laine areas the change of use should not result in a group of three or more adjoining units being in non-A1 use.</p> <p>iv) The unit has been marketed for a minimum of 6 months, at an appropriate rent (providing three comparable shop rents within the centre) with the marketing information clearly demonstrating that there is no realistic prospect of the unit being used for A1 use in the foreseeable future; and</p> <p>v) A shop front has been retained or provided;</p> <p>B) Local Shopping Centres</p> <p>i) The proportion of Class A1 units in the centre would not fall below 50% (as a proportion of total units in the whole centre) taking into account unimplemented planning permission for changes of use;</p> <p>ii) The shop unit has been marketed for a minimum of 6 months, at an appropriate rent (providing three comparable shop rents within the centre) with the marketing information clearly demonstrating that there is no realistic prospect of the unit being used for A1 use in the foreseeable future; and</p> <p>iii) A shop front has been retained or provided.</p> <p><u>Commercial, business and service uses (use class E), learning and non-residential institutions (use class F1) and local community uses (use class F2) will be supported within the city's defined Regional, Town, District and Local Centres (as set out in CPP1 policy CP4 and as shown on the Policies Map).</u></p> <p>1. <u>Proposals for other uses will be permitted where it can be demonstrated that the scheme meets all of the following criteria;</u></p>	

Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification
		<p>a) <u>The proposal will maintain and enhance the vitality, viability and the character of the shopping area;</u></p> <p>b) <u>The proposal will retain active ground floor uses and frontage and provide a direct service or sales to visiting members of the public;</u></p> <p>c) <u>The proposed development or uses will not have a harmful impact on the amenity of local residents due to noise, odour, disturbance or light pollution (see DM21, DM40); and</u></p> <p>d) <u>Shop front design should be in accordance with the council's shop front policy (see DM23).</u></p> <p>2. <u>In addition to criteria a-d) above, proposals within the Lanes¹ and North Laine² areas of the Regional Centre should not result in the amalgamation of three or more adjoining units resulting in an overly dominant unit, in order to retain the unique character of the area.</u></p> <p>3. Residential use may be appropriate above or to the rear of units in shopping centres provided the active frontage is not compromised and that satisfactory residential amenity can be achieved.</p> <p>4. Temporary and 'meanwhile' use of vacant buildings and sites by start-up businesses as well as creative, cultural and community organisations will be considered supported particularly where they help activate and revitalise retail centres <u>and can generate increased footfall.</u></p> <p>As an update to the hierarchy of shopping centres as set out in policy CP4 of the City Plan Part One, the secondary frontage of the Regional Centre has been amended to facilitate a new centre called Brunswick Town Local Centre. This centre is shown on the updated Policies Map.</p> <p>Residential use may be appropriate above or to the rear of units in shopping centres provided the active frontage is not compromised and that satisfactory residential amenity can be achieved.</p>	

Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification
		<p>Temporary and ‘meanwhile’ use of vacant buildings and sites by start up businesses as well as creative, cultural and community organisations will be considered particularly where they help activate and revitalise retail centres.</p> <p>As an update to the hierarchy of shopping centres as set out in policy CP4 of the City Plan Part One, the secondary frontage of the Regional Centre has been amended to facilitate a new centre called Brunswick Town Local Centre. This centre is shown on the updated Policies Map.</p> <p>¹ Within the Lanes area this includes frontages within Market Street, Bartholomews, Meeting House Lane, Nile Street, Brighton Square, Union Street, Ship Street (east), Prince Albert Street, Brighton Place, Hanningtons Lane and Clarence Yard.</p> <p>² Within the North Laine area this includes frontages within Bond Street, Gardner Street, Church Street, North Road, Kensington Gardens, Sydney Street, Gloucester Street and Trafalgar Street.</p>	
	Supporting text to Policy DM12, pages 49-52	<p>DM12 Changes of Use within Regional, Town, District and Local Shopping Centres <i>Amend Policy DM12 supporting text paragraphs 2.103 – 2.121 to read:</i></p> <p>Review of and designation of shopping frontages</p> <p>2.103 Primary and secondary frontages are defined within the Regional, Town and District Centres of the city in order to assist in the safeguarding and managing of retail uses and related facilities and services.</p> <p>2.103 Policy DM12 supports the City Plan Part One policy CP4 Retail provision and SA2 Central Brighton, as the focus of commercial activity in the centres identified in the Retail Hierarchy of Brighton & Hove. The policy contributes towards maintaining and enhancing the attractiveness of town centres by encouraging more people to use these locations. The main uses encouraged within these ground floor frontages to support footfall will be class E (‘commercial, business and service’).</p>	To ensure consistency with changes to the Use Classes Order, as amended pursuant to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020

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		<p><u>2.104 Over recent years the increasing importance of internet shopping has changed the focus of shopping in town centres. The Covid-19 pandemic has exacerbated this trend and a change has been seen in primary shopping areas of the city as retail stores have closed and many national companies have downsized or ceased to trade.</u></p> <p><u>2.105 Increasing economic activity within town centres supports high street vitality. The council will therefore be supportive of alternative uses where proposals enhance the vitality and viability of the centre, provide services or sales to visiting members of the public, maintain an active ground floor use and frontages such as commercial window displays and sight of a reception or arrivals area. Where appropriate proposals should be in accordance with the council's shop front policy DM23. Recognising that our town centres also have a high residential population, the council will ensure that proposals will not have a harmful impact on the amenity of local residents.</u></p> <p><u>2.106 Appropriate alternative uses which could contribute to vitality and viability may include sui generis uses such as launderettes, takeaways, pubs, bars, and cinemas which help generate footfall to an area.</u></p> <p><u>Proposals within the Regional Centre</u></p> <p><u>2.107 One of the council priorities is to maintain central Brighton's role as the city's vibrant, thriving Regional Centre for shopping, leisure, tourism, cultural, office and commercial uses.</u></p> <p><u>2.108 The different but interconnecting shopping areas within the Regional Centre are identified and described in the Retail Study Update 2011. There is active support for the protection of existing and provision of new small unit space, largely catering for local independent traders, located within the Lanes and North Laine areas.</u></p> <p><u>2.109 The availability of small units provides improved choice for business location and affordability. This in turn provides choice for consumers and this contributes significantly towards</u></p>	

Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification
		<p><u>maintaining and enhancing the attractiveness and viability. Small units are often more affordable and encourage more specialist or independent retailers. Therefore in order to assist in maintaining the unique/niche/independent retailers in the Lanes and the North Laine as well as the supply of smaller units, changes of use should not result in the amalgamation of three or more adjoining units in order to create a larger unit.</u></p> <p><u>Primary Shopping Area</u></p> <p><u>2.110 In the case of the Regional, Town and District Shopping Centres, the Primary Shopping Area is the extent of the identified primary and secondary frontages. Local Centres tend to be small, therefore they do not have distinctive primary and secondary frontages.</u></p> <p><u>2.111 In 2017 a review was undertaken of the primary and secondary shopping frontages of the current hierarchy of shopping centres in the city. As part of the review some frontage designations have now changed between primary and secondary designation and a new Local Centre in Brunswick Town and some newly identified Important Local Parades have been included within the retail hierarchy. New developments adjacent to shopping frontages have also been designated where it was appropriate to do so. The review's recommendations are now reflected in the updated Policies Map.</u></p> <p>2.105 The review indicated that it is appropriate to continue the approach of controlling the amount of class A1 uses and non-A1 uses in each centre. This has proven to be a practical approach in the past and one that allows some flexibility for change of uses within the frontages and an achievement of a good mix of uses.</p>	

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		<p>2.106 For a shopping centre to operate successfully it is necessary for shops to group together. Interruption of retail frontages by non-retail uses, such as a restaurant, pub or estate agent can be complementary to the centre's primary shopping function because they can be considered as providing a local service but, the retail function will be adversely affected if the mix of uses is affected by the dilution of too many A1 units.</p> <p>Primary Shopping Area</p> <p>2.107 In the case of the Regional, Town and District Shopping Centres, the Primary Shopping Area is the extent of the identified primary and secondary frontages.</p> <p>Primary and Secondary Frontages</p> <p>2.108 In the Primary Frontages of each centre a higher percentage of A1 uses is set out in the policy to help to ensure that class A1 acts as the dominant use and core function of the centres and to reinforce the overall vitality and viability. The primary frontage sees the highest levels of activity and footfall; therefore it is also appropriate to locate uses to these areas which enhance the character and attractiveness of the centre as a place to visit.</p> <p>2.109 Within the secondary frontages, a wider mix of uses is supported and consequently a lower minimum threshold for class A1 uses is appropriate. Although these areas do not form part of the primary shopping frontages they do still contribute to the overall vitality and viability of the centre offer. Therefore it would not be appropriate for clusters of non-retail uses to form in these locations either.</p> <p>2.110 The percentage of class A1 uses required in the Regional Centre is the highest, in order to maintain its role as the principle shopping centre in East Sussex, which is of considerable importance to the economic and social life of Brighton and Hove.</p>	

Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification											
		<p>2.111 In order to assist in maintaining the unique/niche/independent retailers in the Lanes and the North Laine, changes of use should not result in a group of three or more adjoining units being in non-A1 use in order to ensure that there are a range of retail premises to promote and encourage retailers in these areas of the city centre.</p> <p>2.112 Community uses (e.g. doctors and dentists) which would draw people to the centre and may generate combined shopping visits will also be considered to be appropriate town centre uses where they are considered complementary to the town centre, and where they would maintain a window display and draw pedestrian activity into the centre.</p> <p>Local Centres</p> <p>2.113 Local centres are small groupings, usually comprising a newsagent and a general grocery store and occasionally a sub post office, pharmacy, a hairdresser and other small shops of a local nature. As local centres tend to be small, they do not have primary and secondary frontages. A threshold of 50% A1 use is stipulated to ensure that these centres remain functional to the communities that they serve in providing top up shopping and local services</p> <p>Table 3 – Brighton & Hove’s Retail Hierarchy (adopted City Plan Part 1 Policy CP4 Retail Provision)</p> <table><tr><th>Centre Definition</th><th>Defined Centres</th><th>Linked City Plan Part 1 Policies</th></tr><tr><td>Regional Centre</td><td>Brighton</td><td>DA1, SA2, CP4</td></tr><tr><td rowspan="2">Town Centres</td><td>Hove</td><td>CP4</td></tr><tr><td>London Road</td><td>DA4, CP4</td></tr></table>	Centre Definition	Defined Centres	Linked City Plan Part 1 Policies	Regional Centre	Brighton	DA1, SA2, CP4	Town Centres	Hove	CP4	London Road	DA4, CP4	
Centre Definition	Defined Centres	Linked City Plan Part 1 Policies												
Regional Centre	Brighton	DA1, SA2, CP4												
Town Centres	Hove	CP4												
	London Road	DA4, CP4												

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		District Centres	St James's Street	CP4	
			Lewes Road	DA3, CP4	
			Boundary Road/Station Road	DA8, CP4	
		Local Centres	Mill Lane, Portslade	SA6, CP4	
			Portland Road, Hove	(all centres)	
			'The Grenadier', Hangleton Road		
			Richardson Road, Hove		
			Eldred Avenue, Withdean		
			Old London Road, Patcham		
			Ladies Mile Road, Patcham		
			Seven Dials		
			Fiveways		
			Hollingbury Place, Hollingdean		
			Beaconsfield Road, Preston Park		
			St George's Road, Kemptown		
			Warren Way, Woodingdean		
			Whitehawk Road, Whitehawk		

Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed			Reason for Modification
			High Street, Rottingdean Lustrell's Vale, Saltdean Longridge Avenue, Saltdean Brunswick Town		
		<p>Implementation and Monitoring</p> <p>2.1124 <u>The long-term impact of the pandemic on our town centres is not fully known at this stage and therefore it is critical that the Council continues to monitor the impacts in cooperation with other internal teams as well as external organisations.</u> Implementation of the policy will be assisted by continuing to monitor numbers of retail units <u>uses and vacancy levels</u> within defined shopping centres <u>to be reported in the Authority Monitoring Report.</u> The council will use retail survey data, the lawful use and unimplemented extant permissions to help calculate the proportion of units in A1 use. The council's retail survey data will be updated at least bi-annually. The council will report on this in their Authority Monitoring Report. The performance of existing centres will be monitored by the Council. This might result in a centre being moved higher or lower in the hierarchy; an amendment to an existing centre boundary; or, in the larger centres, a change to the defined prime retail frontage within that boundary. Any forthcoming changes will be undertaken in any review of the City Plan Part One.</p> <p>2.115 As part of the development management process, applicants may wish to conduct similar studies themselves to justify that proposals for changes of use would not result in the proportions of A1 units within the primary and secondary frontages falling below the threshold set out in the policy.</p> <p>Evidence of Marketing</p>			

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		<p>2.116 In demonstrating that marketing for at six months has been carried out, the council will expect the applicant to outline where and how marketing has been undertaken, with details provided to demonstrate that the asking rent has been at a realistic rate, evidence that a prominent advertisement was displayed during the marketing and submitting details of at least three comparable properties for rent. It would be expected that the site has been actively marketed nationally and locally on commercial property websites.</p> <p>Permitted Development Rights</p> <p>2.1137 Several changes to the Permitted Development Rights affecting change of use to and from retail have been introduced in recent years. Where prior approval is needed, the Council will interpret 'key shopping areas' referred to in the General Permitted Development Order as being designated Primary and Secondary Shopping Frontages.</p> <p>2.118 Ongoing monitoring of the concentration of non-retail uses in shopping centres will be maintained in order to continue to examine the feasibility of implementing Article 4 Directions to remove permitted development rights where shopping areas are showing over concentrations of particular non A1 uses.</p> <p>New Development in Centres</p> <p>2.1149 The policy will be applied to new units that are constructed within designated frontages or where they form a logical extension to an existing frontage. <u>Due to the predominance of larger units in the Primary Frontages, proposals for larger format retail will generally be suited to these defined areas.</u></p> <p>2.11520 Residential development contributes to the overall health of centres and to meeting the city's housing target. There is scope to increase housing stock in the centres, by increasing densities or by introducing housing on upper floors, or to the rear of commercial properties,</p>	

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		<p>provided that this does not lead to amenity issues or an unacceptable loss of commercial space and that the commercial uses on the ground floor remain of a viable size <u>to include adequate storage space and staff facilities.</u></p> <p>2.11621 From time to time, temporary uses are sought for vacant buildings or cleared sites that are awaiting redevelopment. Although temporary in nature and therefore often lacking the standards of design and finish that would usually be expected from permanent development, such uses can provide jobs and add much to the vitality and vibrancy of an area in the meantime.</p>	
MM11	Policy DM13, page 53	<p><i>DM13 Important Local Parades, Neighbourhood Parades and Individual Shop Units</i> <i>Amend Policy DM13 to read:</i></p> <p><i>DM13 Important Local Parades, Neighbourhood Parades and Individual Shop Units</i></p> <p>A) Important Local Parades</p> <p>The following shopping areas are designated as Important Local Parades¹ within the retail hierarchy as shown on the Policies Map;</p> <ul style="list-style-type: none"> • Cowley Drive, Woodingdean • Goldstone Villas, Hove • Hove Park Villas, Hove • Islingword Road, Brighton • Old Shoreham Road/Sackville Road, Hove • Preston Drove, Preston Park • Valley Road, Portslade • Victoria Terrace, Hove • Warren Road, Woodingdean • Woodland Parade, Hove 	To ensure consistency with changes to the Use Classes Order, as amended pursuant to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 and to ensure clear interpretation.

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		<p><u>Commercial, business and service uses (E Use Class) will be supported within Important Local Parades.</u></p> <p><u>Proposals for other uses will be permitted where it is demonstrated that the scheme meets the following criteria:</u></p> <ul style="list-style-type: none"> a) <u>The proposal will maintain and enhance the vitality, viability and the character of the shopping area;</u> b) <u>The proposal will retain an active ground floor use and provide a direct service or sales to visiting members of the public;</u> c) <u>The proposed development or use(s) will not have a harmful impact on the amenity of local residents, due to noise, odour, disturbance or light pollution; and</u> d) <u>Shopfront design should be in accordance with the council's shop front policy (DM23).</u> <p>In Important Local Parades, changes of use involving the loss of units in A1 use class, will be permitted where;</p> <ul style="list-style-type: none"> a) The proposal would not result in the number of units in class A1 use falling below 50%; and b) The shop unit has been marketed for a minimum of one year; <p>Changes of use at ground floor to residential will be permitted to the rear or on upper floors in Important Local Parades.</p> <p>Temporary and 'meanwhile' use of vacant buildings by start-up businesses as well as creative, cultural and community organisations will be considered <u>supported</u> where they help activate and revitalise retail centres <u>parades and can generate increased footfall.</u></p> <p>B) Neighbourhood Parades and Individual Shop Units</p>	

Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification
		<p>Planning permission will be granted for change of use of shops (use classes A1 to A5) to non A1- A5 uses outside of designated centres and Important Local Parades provided that;</p> <p>a) There are alternative shopping facilities within reasonable walking distance (300 metres);</p> <p>b) The shop unit has been marketed for a minimum of one year;</p> <p>¹ As designated on the Policies Map.</p>	
	Supporting text to Policy DM13, pages 54-55	<p><i>DM13 Important Local Parades, Neighbourhood Parades and Individual Shop Units</i> <i>Amend Policy DM13 supporting text paragraphs 2.122 2.129 to read:</i></p> <p>2.122 The term ‘Important Local Parades (ILPs)’ as defined on the Policies Map refers to a group of shops (five <u>six</u> or more). ILPS have a key role in contributing to sustainable development, providing access to day-to-day necessities such as a newsagent, convenience store off-licence, pharmacies and post offices, <u>which are easily accessible to people without a car or with restricted mobility within walking distance from home. Access to these local facilities have become more important during the Covid-19 pandemic. Parades complement the local shopping facilities provided in the city’s designated centres and ensure that local convenience shopping facilities are within walking distance to residential areas. ILP’s tend to be characterised as areas of smaller shops with traditional shopfronts, offering a range of services, located in close proximity to residential neighbourhoods.</u></p> <p>2.123 <u>An assessment of 35 shopping parades was undertaken in 2017 and reviewed in 2019 in order to identify areas that could be designated as Important Retail Parades in City. The assessment was set out in the council’s Shopping Frontage Review Paper (April 2020) and its subsequent amendments.</u></p>	<p>To ensure consistency with changes to the Use Classes Order, as amended pursuant to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.</p> <p>To adequately reflect description of ILP in evidence base of being six or more shops and to provide clarity on ‘character of ILP’.</p>

		<p><u>2.124 There may be some circumstances where alternative uses will be acceptable such as when they also provide services or sales to visiting members of the public, maintain an active ground floor use and frontages such as commercial window displays and sight of a reception or arrivals area. Where appropriate proposals should be in accordance with the council's shop front policy DM23. Recognising that Important Local Parades tend to be in close proximity to residential areas, the council will ensure that proposals will not have a harmful impact on the amenity of local residents.</u></p> <p>2.123 The term 'Neighbourhood Parade' refers to a cluster of three or more units in class A1 use such as a newsagent, convenience store or off-licence, together with A2 uses, for example estate agents or A3, A4 or A5 uses, that function as a group and are capable of serving the convenience needs of a local residential catchment population particularly for older people, people with disabilities and the very young who cannot easily travel far, it is important that convenience retail needs can be met within an easy walking distance within their neighbourhood. In terms of sustainable development, it is important that people are not dependant on use of the car for their day to day retail needs. In areas not close to larger retail centres, parades and isolated shop units provide convenient access to goods and services which are needed on a day to day basis. To support sustainable communities the loss of retail and services will be resisted in under-served areas.</p> <p>2.124 The function of parades has gradually changed over time, and in addition to shops that perform a local shopping function, many parades now provide more specialist retailers (for example, bridal wear or musical instruments) together with a range of non-retail uses such as takeaways. Whilst non-retail uses can provide an important local function, there is risk that the presence of too many can undermine the ability of the parade to meet local shopping needs and are still anchored by at least one convenience retailer. It is vital, therefore, that each neighbourhood parade continues to offer a good balance of shops and services to support residents' day-to-day needs, whilst providing flexibility to allow for other appropriate uses.</p> <p>2.125 When determining applications for planning permission or prior approval for retail to residential permitted development, the council will not normally permit development resulting in the loss of local retail and service provision unless there is alternative equivalent provision within</p>	
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Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification
		<p>300 metres. This is considered a reasonable walking distance (5 minutes for the average person) to access convenience shopping and local services. Provision will be considered equivalent where it provides a similar offer which meets the same need, such as the need for fresh food or a financial service.</p> <p>2.126 Where applications involve the loss of units in A1 use class, the council will require supporting evidence that retail use(s) are no longer economically viable. Applicants will be expected to demonstrate an active marketing campaign for a continuous period of at least a 12 months with evidence submitted showing that a prominent advertisement was displayed during the marketing, whilst the premises was vacant or in 'meanwhile use', which has been shown to be unsuccessful. In addition, for neighbourhood parades and individual retail units where there is no equivalent alternative provision within 400 metres, it will also need to be demonstrated that Use Classes A2, A3 and laundrettes are not viable, before any other uses will be permitted. However, subject to the policy requirements, change of use to a community facility such as a community centre may be permitted where it can be demonstrated there is a need for such provision.</p> <p>2.127 In all cases, demonstration of need must include evidence of consultation with service providers and the local community and an audit of existing provision within the local area.</p> <p>2.128 Brighton and Hove has numerous small local shopping parades and individual shops located in local residential communities. It is important that these shopping facilities remain vibrant, attractive and accessible. Providing local shopping and related facilities within walking distance enables the less mobile, including the elderly and low income groups, access to food and services close to where they live, and is important in achieving equality of opportunity and sustainable neighbourhoods.</p> <p>2.129 From time to time, temporary uses are sought for vacant buildings or cleared sites that are awaiting redevelopment. Although temporary in nature and therefore often lacking the standards</p>	

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		of design and finish that would usually be expected from permanent development, such uses can provide jobs and add much to the vitality and vibrancy of an area in the meantime.	
MM12	Policy DM14, page 56	<p><i>DM14 Commercial and Leisure Uses at Brighton Marina</i> <i>Amend Policy DM14 to read:</i></p> <p><u>Within the Brighton Marina Inner Harbour area¹ commercial, business and service uses (E use class) and local community uses (F2 use class) will be supported.</u></p> <p>In order to maintain and enhance the special commercial <u>existing commercial</u> and leisure offer within Brighton Marina, changes of use in existing retail/commercial/service frontages will be permitted provided that all of the following criteria are met;</p> <ul style="list-style-type: none"> a) The proposed use would improve the vitality and viability of the Marina, by encouraging combined trips and attracting pedestrian activity; and b) The development <u>proposed use</u> would not be materially detrimental to the amenities of occupiers of nearby properties or the general character of the Marina; c) A window display is provided to retain an active frontage <u>The proposal will retain an active ground floor use and frontage and provide a direct service or sales to visiting members of the public;</u> d) <u>The proposed use would not have a harmful impact on amenity due to noise, odour, disturbance or light pollution.</u> <p>A change of use at ground floor level to residential in retail / commercial/ leisure <u>service</u> frontages will not be permitted but may be considered appropriate on upper floors.</p> <p>¹ The Brighton Marina Inner Harbour area is a strategic site allocation in the adopted City Plan Part One (DA2.C.1)</p>	To ensure consistency with changes to the Use Classes Order, as amended pursuant to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 and to ensure clear interpretation.

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	Supporting text to Policy DM14, page 56	<p><i>DM14 Commercial and Leisure Uses at Brighton Marina</i> <i>Amend supporting text paragraphs 2.130 -2.132 to read:</i></p> <p>2.130 Brighton Marina, functions as an independent component of the city's urban area. The Marina provides a mix of housing, shopping, commercial, leisure and recreational buildings in addition to being performing as <u>a working harbour</u>. This creates a unique commercial and leisure environment.</p> <p>2.131The majority of existing retail activity takes place in the Merchant's Quay /Marina Square, <u>the Waterfront</u> and at the ASDA superstore. Brighton Marina contains a range of bars, restaurants and factory outlet stores related to its wider recreation and leisure role City Plan Part One Policy DA2 Brighton Marina, Gas Works and Black Rock Area). Brighton Marina is no longer designated as a shopping centre in the retail hierarchy and therefore any proposals for additional retail development not allocated by policy DA2 in City Plan Part One will need to meet the tests of policy CP4 and the National Planning Policy Framework¹.</p> <p>2.132 The purpose of this policy is to broaden and strengthen the choice and performance of commercial activity in the Marina by proposing a flexible approach to ensure that its vitality and viability is maintained and enhanced <u>whilst protecting the amenity, public safety and security of existing residents and visitors</u>. Both retail and non-retail uses (including community facilities) <u>Uses</u> should draw additional pedestrian activity to the Marina to strengthen its offer and provide other facilities required to support existing residents and visitors, as well the increased population that will be generated by the proposed additional residential developments. <u>There may be some circumstances where alternative uses will be acceptable, such as when they provide services or sales to visiting members of the public and maintain an active ground floor use and frontages such as commercial window displays and sight of a reception or arrivals area.</u></p> <p>¹National Planning Policy Framework (NPPF) (2019) paragraphs 89-90</p>	To ensure the supporting text is consistent with proposed changes to policy wording and to provide clarity.

Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification
MM13	Policy DM15, page 57	<p><i>DM15 Commercial and Leisure Uses on the Seafront</i> Amend Policy DM15 to read:</p> <p>Development proposals, including change of use, for new shop retail retail, food and drink premises premises (class E (a) & (b)), hot food takeaways, and bars, pubs drinking and nightclubs establishments (A1-A5 Use Class) (sui generis use) and galleries (D1 Use Class Class F1b) and museums (D2 Use Class Class F1c) will be permitted on the lower promenade, Madeira Drive and within the seafront arches, will be permitted provided that all of the following criteria are met;</p> <ul style="list-style-type: none"> a) The existing diversity and mix of retail sport, leisure, cultural and recreation uses along the seafront will be retained or enhanced; b) The proposed development is of appropriate scale and design to complement the historic character and setting of the seafront (See City Plan Part One Policies SA1 and CP4); c) The proposal will support the role of the seafront as recreation and tourist destination helping to extend footfall and reduce seasonality; and d) The proposed development or uses will not have a harmful impact on the amenity of local residents, visitors and the seafront due to noise, odour, disturbance and or light pollution 	To ensure consistency with changes to the Use Classes Order, as amended pursuant to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 and to ensure clear interpretation.
	Supporting text to Policy DM15, page 57	<p><i>DM15 Commercial and Leisure Uses on the Seafront</i> Amend the supporting text at paragraph 2.133 and 2.134 to read:</p> <p>2.133 The City's seafront arches are occupied by a variety of tenants and provide an eclectic offer to visitors and residents alike. The seafront traders occupy the length of the arches loosely by 'zone', such as sport, outdoor leisure, artist quarter leisure, restaurants and bars, as well as recreation. Opportunities exist for additional shops and food and drink facilities to cater for visitors from small kiosks to small scale shops, cafes or restaurants in certain areas. There is the potential to enhance the range of uses in order to increase activity in the evening, reduce seasonality and extend footfall along the seafront to the east. Policy CP17 Sports Provision will apply to new sport or leisure proposals.</p>	To remove duplication of word leisure.

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		2.134 Any <u>temporary</u> use extending for more than <u>the time allowed under permitted development rights 28 days</u> (consecutively or in a single year) requires planning permission. Interim or 'meanwhile' uses such as pop-up cafés, performance space/ community uses shops and temporary uses of empty property and land can help to animate and activate vacant buildings/ sites before regeneration or development begins. This can have the benefit of providing an interim income stream whilst also enhancing the attractiveness of a site or location for potential future tenants.	To futureproof the wording in case of future changes to planning legislation.
MM14	Policy DM18 page 63	<p><i>Policy DM18 High quality design and places</i> <i>Amend the first sentence of the policy to read:</i></p> <p><u>Planning permission will be granted for development proposals that demonstrate</u> Development proposals must demonstrate a high standard of design and make a positive contribution to a sense of place and the visual quality of the environment. The council will require an integrated approach to the design process from project inception where place making and sustainable development, including the principles of the circular economy, are considered as one.</p>	To ensure the policy wording is clear and unambiguous.
	Policy DM18 page 63	<p><i>Policy DM18 High quality design and places</i> <i>Amend the last sentence of the policy to read:</i></p> <p>In addition to the above, major development proposals on strategic and/or prominent sites should also consider that are likely to have an impact on public realm are required to <u>incorporate the</u> incorporation of an artistic element.</p>	To ensure the policy wording is clear and unambiguous that proposals likely to have an impact on public realm will need to demonstrate how an artistic element has been incorporated.

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	Supporting text to Policy DM18, para 2.147, page 63	<p>Policy DM18 High quality design and places <i>Amend the supporting text at paragraph 2.147 to read:</i></p> <p>More detailed design guidance for developers, including area- and site-specific design principles, will form part of the are set out in the National Design Guide, SPD17 Urban Design Framework Supplementary Planning Document and future design codes the council will bring forward to which will support City Plan Part 1 Policies CP12 Urban Design and City Plan Part 2 Policy DM18 High Quality Design and Places. Guidance on identified strategic views and how new strategic and local views can be identified will be is included in SPD17.</p>	To reflect adoption of SPD17 Urban Design Framework in July 2021, and updates to the NPPF (paragraphs 127 and 128) in respect to the preparation of codes and to reference the National Design Guide.
	Supporting text to Policy DM18, paragraph 2.148 page 64	<p>DM18 High Quality Design and Places <i>Amend the supporting text at paragraph 2.148 after the third sentence to read:</i></p> <p>The scale of consideration of local context should be commensurate with the scale and impact of the proposals <u>as well as significant and exceptional site constraints</u>. For example, from the street scale in the case of a single dwelling proposal to a neighbourhood, and/or city-wide scale in the case of a larger and/or strategic development.</p>	To clarify that the impact of significant and exceptional site constraints upon design solutions will also be taken into consideration.
	Supporting text to Policy DM18, para 2.149, page 64.	<p>DM18 High Quality Design and Places <i>Amend the last sentence of the supporting text at paragraph 2.149 to read:</i></p> <p>Criteria for assessing proposals for tall buildings, including cumulative impact will be <u>are</u> set out in the <u>SPD17</u> Urban Design Framework SPD.</p>	To reflect adoption of SPD17 Urban Design Framework in July 2021.
	Supporting text to Policy DM18, paragraph 2.156 page 66	<p>DM18 High Quality Design and Places <i>Amend the supporting text at paragraph 2.156 after the first sentence to read:</i></p> <p><u>It refers to providing amenities that allow users to take advantage of the micro-climate conditions, such as sunshine/ shade, and are conducive to relaxation, play and social engagement.</u></p>	To provide additional clarity on the meaning of comfort, image and socialbility.

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	Supporting text to Policy DM18, paragraph 2.158 page 66	<p>DM18 High Quality Design and Places Amend the supporting text at paragraph 2.158:</p> <p>The council's vision for public art in the city is set out in the Public Art Strategy. Proposals for major applications on strategic or prominent sites or development that is<u>are</u> likely to have an impact on the public realm will need to demonstrate <u>how they have had regard to the objectives of the council's Public Art Strategy and</u> relevant art and public realm-related strategies and guidance.</p>	To provide greater clarity in respect the role and weight of the council's emerging Public Art Strategy which will set out the overarching strategy for public art in the city.
MM15	Policy DM20 page 69	<p>DM20 Protection of Amenity Amend the policy to read:</p> <p>Planning permission for development including change of use will be granted where it would not cause unacceptable loss of amenity to the proposed, existing, and / or adjacent <u>or nearby</u> users, residents, occupiers or where it is not liable to be detrimental to human health.</p>	To capture the full range of harms that can arise to those adjacent and nearby.
	Supporting text to Policy DM20, para 2.169, page 70	<p>DM20 Protection of Amenity Amend the supporting text at paragraph 2.169:</p> <p>Further guidance will be<u>is</u> provided in the SPD17 Urban Design Framework. Supplementary Planning Document (UDF SPD⁴⁹)</p>	To reflect adoption of SPD17 Urban Design Framework in July 2021.
	Footnote 29, page 70	<p>DM20 Protection of Amenity Delete footnote:</p> <p>⁴⁹ A draft version of the Urban Design Framework is currently being prepared and adoption is anticipated in 2020.</p>	To reflect adoption of SPD17 Urban Design Framework in July 2021.

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MM16	Policy DM22 page 72	<p>Policy DM22 Landscape Design and Trees <i>Amend (d) and (e) of policy to read:</i></p> <p>d) the retention of existing trees and hedgerows with details <u>provided</u> of appropriate protection during construction.</p> <p>e) Where removal <u>of a tree</u> is unavoidable, <u>for example by reason of it being severely diseased or dangerous:</u></p> <p>(i) the provision of plans <u>is required</u> that clearly identify the location and species of all those to be lost and all those to be retained; <u>and</u></p> <p>(ii) e)-replacement trees along with appropriate associated planting space and works of a type of tree, size and location to the satisfaction of the council for any tree felled; for example by reason of it being severely diseased or dangerous.</p>	To ensure the policy wording is clear and unambiguous.
	Policy DM22 page 73	<p>DM22 Landscape Design and Trees <i>Add new footnote after the words "national importance" in the second paragraph on page 73:</i></p> <p><i>New footnote to read:</i> <u>Development of national importance includes, for example, infrastructure projects, where the public benefit would outweigh the loss or deterioration of habitat, as defined by footnote 63 of the NPPF (2021).</u></p>	To add further clarity to policy.
	Supporting text to policy DM22 para. 2.175 page 74	<p>Policy DM22 Landscape Design and Trees <i>Amend final sentence of paragraph 2.175 of supporting text to read:</i></p>	To better accord with NPPF paragraph 131.

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		Early consideration ensures advantage of the ‘additional’ opportunities landscape, <u>trees and planting</u> provides can be taken, such as, climate change mitigation and resilience, water purification, air pollution mitigation...	
	Supporting text to Policy DM22 para. 2.177 page 74	DM22 Landscape Design and Trees <i>Amend paragraph 2.177, after fifth sentence to read:</i> Native species will be encouraged in particular those of local origin subject to climate change adaptability. <u>Tree stock sourced from the UK or Ireland, and locally sourced seeds is encouraged.</u>	To add further clarity to policy point (h).
	Supporting text to DM22 para. 2.178 page 74	DM22 Landscape Design and Trees <i>Amend paragraph 2.178 to read:</i> 2.178 <u>Existing landscape features can be used more effectively if they have multi-functional uses. For example, natural landscape design features can provide opportunities for informal play or sports; productive plants that form part of the landscape design can provide opportunities for food growing. Provision of food growing opportunities should have regard to the Food Growing Planning Advice Note. Effective landscaping will be required...</u>	To add clarity to policy point (g) and cross refer to the Food Growing Planning Advice Note for further guidance.
	Supporting text to DM22, para. 2.179 page 75	Policy DM22 Landscape Design and Trees <i>Amend paragraph 2.179 of supporting text to read:</i> ...provide shelter; <u>support climate change mitigation and resilience;</u> and can help to reduce noise and atmospheric pollution.	To better accord with NPPF paragraph 131.
	Supporting text to DM22, para. 2.180 page 75	DM22 Landscape Design and Trees At the end of supporting text paragraph 2.180 add the following:	For thoroughness and to ensure cross-references to all relevant adopted supplementary

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		Proposals will be expected to have taken into account the guidance provided in SPD06 Trees and Development Sites.	planning guidance are included.
	Supporting text to Policy DM22 para. 2.184 page 76	<p>DM22 Landscape Design and Trees Amend penultimate sentence of paragraph 2.184 to read:</p> <p>If trees are (or will become) owned or maintained by the council then, alongside maintenance plans, applicants will be expected to provide adequate funding to manage additional maintenance that is foreseeable as a result of development <u>in consultation with City Parks and in accordance with Policy CP7 Developer Contributions.</u></p>	To reflect practice and to ensure policy is clear and unambiguous.
MM17	Policy DM25 Page 81	<p>Policy DM25 Communications Infrastructure Amend criterion b) to read</p> <p>b) The significance, appearance, character and setting of heritage assets and their settings are conserved or enhanced, in accordance with City Plan Part One Policy CP15 Heritage;</p>	To ensure the policy word is clear and consistent in describing heritage assets and their settings.
	Policy DM25 page 81	<p>Policy DM25 Communications Infrastructure Amend last two paragraphs of policy to read:</p> <p>New development or major renovation works to existing buildings should ensure that <u>provide</u> sufficient ducting space for future digital full fibre connectivity infrastructure is provided as part of the development.</p> <p>Where possible/feasible, the council will encourage the removal of older communication equipment that is no longer required <u>should be removed</u> in order to minimise visual impact.</p>	To ensure the policy wording is clear and unambiguous.
MM18	Policy DM26, page 85	<p>Policy DM26 Conservation Areas Amend policy by adding a new paragraph after the list of criteria as follows:</p>	To ensure the policy wording is clear, effective and

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		<u>Where either substantial harm or less than substantial harm is identified, the council will expect the applicant to fully meet the requirements set out in the NPPF, having regard to the significance of the conservation area/s affected.</u>	consistent with paragraphs 201-202 of the NPPF.
	Supporting text to policy DM26, page 85	<p>Policy DM26 Conservation Areas <i>Amend paragraph 2.208 of the supporting text to add a final sentence as follows:</i></p> <p><u>Where appropriate, having regard to the scale of the development and the extent and importance of the heritage asset(s), a Heritage Impact Assessment will be required with an application. This should have regard to the Historic England guidance on 'Statements of Heritage Significance'.</u></p>	To ensure the wording is clear and unambiguous and for consistency with the site allocation policies.
MM19	Policy DM27, page 86	<p>Policy DM27 Listed Buildings <i>Amend the policy by adding the following new paragraph after the list of criteria:</i></p> <p><u>Where either substantial harm or less than substantial harm is identified the council will expect the applicant to fully meet the requirements set out in the NPPF, having regard to the significance of the listed building/s affected.</u></p>	To ensure the policy wording is clear, effective and consistent with paragraphs 201-202 of the NPPF.
	Supporting text to policy DM27, page 86	<p>Policy DM27 Listed Buildings <i>Amend paragraph 2.213 of the supporting text to state as follows:</i></p> <p>There is a general presumption in favour of the preservation of listed buildings. Where substantial harm is identified the council will expect the applicant to fully meet the requirements set out in the NPPF. Any substantial public benefits put forward <u>to be balanced against substantial harm</u> must directly relate to the development itself, must benefit the local community in the long term and must not otherwise be achievable.</p>	To ensure the wording is clear and unambiguous in support of the modified policy.

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	Supporting text to policy DM27, page 87	<p>Policy DM27 Listed Buildings <i>Amend paragraph 2.218 of the supporting text to add a final sentence as follows:</i></p> <p><u>Where appropriate, having regard to the scale of the development and the extent and importance of the heritage asset(s), a Heritage Impact Assessment will be required with an application. This should have regard to the Historic England guidance on 'Statements of Heritage Significance'.</u></p>	To ensure the wording is clear and unambiguous and for consistency with the site allocation policies.
MM20	Policy DM28, page 88	<p>Policy DM28 Locally Listed Heritage Assets <i>Amend the 2nd paragraph of the policy to read:</i></p> <p>Alterations and extensions to a locally listed heritage asset, or new development within its curtilage, should be of a high standard of design that respects the special interest of the asset as set out in the Local List <u>entry (or as otherwise identified within a submitted Statement of Heritage Significance)</u> (or, where not included, within a submitted heritage statement.</p>	To ensure the policy wording is clear and unambiguous in respect of potential non-designated heritage asets identified during the application or pre-application process.
	Supporting text to policy DM28, page 88	<p>Policy DM28 Locally Listed Heritage Assets <i>Amend paragraph 2.221 of the supporting text to add a final sentence as follows:</i></p> <p><u>Where appropriate, having regard to the scale of the development and the extent and importance of the heritage asset(s), a Heritage Impact Assessment will be required with an application. This should have regard to the Historic England guidance on 'Statements of Heritage Significance'.</u></p>	To ensure the wording is clear and unambiguous and for consistency with the site allocation policies.
MM21	Policy DM29, page 89	<p>Policy DM29 The Setting of Heritage Assets <i>Amend the policy by adding the following new paragraph after the list of criteria:</i></p>	To ensure the policy wording is clear, effective and consistent with

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		<u>Where either substantial harm or less than substantial harm is identified the council will expect the applicant to fully meet the requirements set out in the NPPF, having regard to the significance of the heritage asset/s affected.</u>	paragraphs 201-202 of the NPPF.
	Policy DM29, page 89	<p><i>Policy DM29 The Setting of Heritage Assets</i> <i>Amend the last paragraph of the policy to read:</i></p> <p>Opportunities should be taken to enhance the setting of a heritage asset through new development. Where a major development impacts on the settings of multiple heritage assets, <u>the scale of impact should be assessed against the importance of the heritage asset and the degree to which setting contributes to its significance</u> priority should be given to enhancing the setting of the asset(s) of greatest significance.</p>	The ensure the policy wording is effective and for consistency with paragraph 199 of the NPPF.
	Supporting text to Policy DM29, para. 2.227 page 89	<p><i>Policy DM29 The Setting of Heritage Assets</i> <i>Amend the first sentence of paragraph 2.227 of the supporting text to read:</i></p> <p><u>Reference to scale in the policy includes height.</u> Consideration of setting in urban areas, given the potential numbers and proximity of heritage assets, will often overlap with considerations of both townscape/urban design and of the character and appearance of conservation areas. This policy does not therefore preclude a bold architectural approach where appropriate.</p>	To ensure the wording is clear and unambiguous and aligns with the definition in the Town and Country Planning (Development Management Procedure) (England) Order 2015.
	Supporting text to policy DM29, page 90	<p><i>Policy DM29 The Setting of Heritage Assets</i> <i>Amend paragraph 2.228 of the supporting text to add a final sentence as follows:</i></p> <p><u>Where appropriate, having regard to the scale of the development and the extent and importance of the heritage asset(s), a Heritage Impact Assessment will be required with an application. This should have regard to the Historic England guidance on 'Statements of Heritage Significance'.</u></p>	To ensure the wording is clear and unambiguous and for consistency with the site allocation policies.

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MM22	Policy DM30, page 91	<p>Policy DM30 Registered Parks and Gardens <i>Amend the second sentence of the first paragraph of policy to read:</i></p> <p>In assessing this the impact of such proposals on the significance of the park or garden, the council will have particular regard to the impact <u>of development</u> on any notable view of, within or across the park or garden.</p>	To ensure the wording is clear and unambiguous.
	Policy DM30, page 91	<p>Policy DM30 Registered Parks and Gardens <i>Amend the first sentence of the current second paragraph of policy to read:</i></p> <p>As an exception to the above, and wWhere permission is required, temporary uses or events (including associated structures) may <u>exceptionally</u> be permitted where any harm caused would be strictly temporary, <u>clearly</u> minor and easily reversible, having regard to the significance of the site within the park and garden, the scale of impact, timing and any public benefits arising from the use or event.</p>	To ensure the wording is clear and unambiguous
	Policy DM30, page 91	<p>Policy DM30 Registered Parks and Gardens <i>Amend the policy by inserting a new 2nd paragraph as follows:</i></p> <p><u>Where either substantial harm or less than substantial harm is identified the council will expect the applicant to fully meet the requirements set out in the NPPF, having regard to the significance of the parks/s and garden/s affected.</u></p>	To ensure the policy wording is clear, effective and consistent with paragraphs 201-202 of the NPPF.
	Supporting text to policy DM30, page 91	<p>Policy DM30 Registered Parks and Gardens <i>Amend paragraph 2.234 of the supporting text to add a final sentence as follows:</i></p> <p><u>Where appropriate, having regard to the scale of the development and the extent and importance of the heritage asset(s), a Heritage Impact Assessment will be required with an application. This should have regard to the Historic England guidance on 'Statements of Heritage Significance'.</u></p>	For clarity and for consistency with the site allocation policies.

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	Supporting Text to Policy DM30, page 91	<p>Policy DM30 Registered Parks and Gardens Amend paragraph 2.235 by adding new second sentence to read:</p> <p><u>All applications will be expected to include evidence to show what alternative sites have been considered and why they are not deemed suitable.</u></p>	To ensure the wording is clear and unambiguous in respect of temporary uses or structures.
MM23	Policy DM31 page 93	<p>Policy DM31 Archaeological Interest Amend the first sentence of the fourth paragraph of the policy to read:</p> <p>Where the council has reason to believe, either from the archaeological assessment or from other evidence sources, that significant archaeological remains may exist, a suitable field evaluation and/or survey (e.g. for standing buildings and structures) will be required <u>pre-determination</u>.</p>	To ensure the policy wording is clear and effective.
	Supporting text to Policy DM31, page 93	<p>Policy DM31 Archaeological Interest Amend paragraph 2.237 of the supporting text to read:</p> <p>Archaeological remains are finite and irreplaceable resources which are particularly vulnerable to the effects of new development. Archaeological interest is defined in the NPPF. <u>Where either substantial harm or less than substantial harm is identified the council will expect the applicant to fully meet the requirements set out in the NPPF.</u></p>	To ensure the policy wording is clear, effective and consistent with paragraphs 201-202 of the NPPF.
MM24	Policy DM32, page 95	<p>Policy DM32 The Royal Pavilion Estate Amend criterion d) of part 1 of the policy to read:</p> <p>d) Transform <u>Enhance</u> the quality and infrastructure of the gardens and enable the <u>better</u> management of activities within them;</p>	To ensure the policy wording is clear and unambiguous and to acknowledge the previous restoration scheme.

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	Supporting text to Policy DM32, page 96	<p>Policy DM32 The Royal Pavilion Estate Amend the second sentence of paragraph 2.245 of the supporting text to read:</p> <p>This should include improving the infrastructure within the gardens, such as Whilst the gardens were positively restored in the late 20th century, opportunity should be taken to enhance that <u>previous scheme with, for example,</u> protective fencing, better paths and lighting levels, improved irrigation and waste disposal and better facilities for the gardening staff.</p>	To acknowledge the positive impact of the late 20th century restoration scheme.
	Supporting text to Policy DM32, page 96	<p>Policy DM32 The Royal Pavilion Estate Amend paragraph 2.246 of the supporting text by adding a new third sentence and by amending the fourth sentence so that they read as follows:</p> <p><u>The garden's historic interest is in part its use as a promenading garden and place for reflection.</u> The impact <u>Impacts</u> on public views and access will <u>also</u> form <u>a key</u> part of considerations.</p>	To ensure the wording is clear and unambiguous and to reflect the significance of the garden.
MM25	Policy DM33	<p>Policy DM33 Safe, Sustainable and Active Travel Amend criterion 2(d) of the policy to read:</p> <p>provide for sufficient levels of cycle parking facilities in line with the Parking Standards for New Development (Appendix 2) (and any subsequent revisions)</p> <p>Amend criterion 2(e) of the policy to read:</p> <p>3) <u>where appropriate</u> make provision for high quality facilities that will encourage and enable cycling <u>including such as</u> communal cycle maintenance facilities, workplace showers, lockers and changing facilities;</p>	<p>For legal compliance. An update to the Parking Standards must take place through a review of the Plan.</p> <p>To clarify that such facilities are not required to be included within all developments.</p>

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	Policy DM33 Page 98	<i>Policy DM33 Safe, Sustainable and Active Travel</i> <i>Amend part 4(c):</i> c) Do not prejudice the implementation of proposed road safety improvements set out in the Local Transport Plan (and subsequent revisions/successor documents or programmes) and the council's Road Safety/Safer Roads Strategy ; and	Factual update as Road Safety Strategy has expired
	Policy DM33	<i>Policy DM33 Safe, Sustainable and Active Travel</i> <i>Amend footnote 64 to read:</i> Non-standard cycles are those which do not easily fit into standard cycle racks, for example tricycles <u>and cycles for those with disabilities.</u>	To clarify that 'non-standard cycles' includes cycles designed for those with disabilities.
	Supporting text to Policy DM33, paragraph 2.253 page 100	<i>Policy DM33 Safe, Sustainable and Active Travel</i> <i>Add sentence to end of paragraph 2.253:</i> <u>In providing new infrastructure for cycling and walking, applicants should also have regard to 'The Guide to Inclusive Cycling' (Wheels for Wellbeing, 2020), national guidance in 'Cycle Infrastructure Design (Local Transport Note 1/20)' and 'Gear Change; A bold vision for cycling and walking', in addition to the council's Local Cycling and Walking Infrastructure Plan.</u> <i>Add sentence to end of paragraph 2.254:</i> <u>In providing new infrastructure for public transport, applicants should have regard to the Brighton & Hove Bus Service Improvement Plan.</u>	To include reference to important and relevant new national and local documents.

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MM26	Supporting text to Policy DM34 paragraph 2.257 page 103	<p>Policy DM34 Transport Interchanges Amend paragraph 2.257 as follows:</p> <p>2.257 The policy seeks to facilitate the provision of purpose-built and strategic transport interchange facilities where they would help to reduce traffic congestion across the city and are suitably located and designed. This issue will be considered further as part of a future <u>Local Transport Plans Traffic Network Management Strategy and Interchange Strategy</u>.</p>	Factual update to reflect the intentions of the Local Highway Authority.
	Policy DM34 footnote 65 Page 102	<p>Policy DM34 Transport Interchanges Amend footnote 65 as follows:</p> <p>⁶⁵<u>The test set out in Department for Transport C2/13 para 10 and NPPF para. 32. Circular 02/2013, particularly paragraphs 9 & 10, and the NPPF (2019), particularly paragraphs 110 and 111</u></p>	Factual update on circular advice and NPPF 2021 paragraph references updates (paragraphs 110-111)
MM27	Policy DM35, page 104	<p>Policy DM35 Travel Plans and Transport Assessments Amend the part (1) to read:</p> <p>Transport Statements, Transport Assessments, Construction and Environmental Management Plans and Travel Plans are required to support planning applications for all developments that are likely to generate significant amounts of movement/travel in-line <u>accordance</u> with the NPPF or <u>and having regard to any subsequent national or</u> locally derived standards and guidance.</p>	To clarify the status of locally derived standards and guidance following discussions at the hearing sessions.
	Policy DM35, page 104	<p>Policy DM35 Travel Plans and Transport Assessments Amend the second sentence of part (3) to read:</p> <p>Where Transport Statements or Transport Assessments are required for developments elsewhere, as set out in criterion (1), <u>the likely</u> traffic impacts within AQMA's should be <u>considered and agreed with the council in order to determine</u> considered to inform decisions about whether an AQA is required.</p>	To ensure the policy wording is clear and unambiguous.

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	Policy DM35, page	<p>Policy DM35 Travel Plans and Transport Assessments Amend the fourth sentence of paragraph 2.261 to read:</p> <p>Matters to be considered will include accordance with SPD14 <u>the parking standards set out in Appendix 2</u>, likelihood and impact of potential overspill parking onto nearby streets, trip generation, and arrangements for servicing and deliveries. Whilst development should generally be located in the most accessible locations, some development proposals, for example in urban fringe locations, may give rise to the need for a package of transport measures to support sustainable travel.</p>	To ensure the policy wording is clear and unambiguous.
MM28	Policy DM36, criterion 2, page 107	<p>Policy DM36 Parking and Servicing Amend policy introduction and criterion 2 to read:</p> <p>Provision of parking, including 'blue badge' holder and cycle parking, in new developments should follow the standards in SPD14 'Parking Standards for New Development' (and any subsequent revisions) as set out in Appendix 2. In addition:</p> <p>2) Car-free residential developments will be supported and encouraged subject to consideration of relevant factors as set out in SPD14 'Parking Standards for New Development' (and any subsequent revisions).</p>	For legal compliance. An update to a SPD cannot change a policy requirement.
	Supporting text to Policy DM36, paragraph 2.266, page 108	<p>Policy DM36 Parking and Servicing Amend paragraph 2.266 to read</p> <p>...The guidance in the SPD on parking levels is now transposed into policy and is set out in full in Appendix 2. This reflects local circumstances and aims to strike the right balance between providing appropriate levels of car parking spaces whilst also promoting sustainable forms of transport in areas of good public transport accessibility. Any future revisions to these standards will replace those currently set out in the Appendix 2.</p>	For legal compliance. An update to a SPD cannot change a policy requirement

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	Policy DM36 Paragraph 2.268, page 108	<i>Policy DM36 Parking and Servicing</i> <i>Amend the first sentence in paragraph 2.268 to read:</i> In locations where it cannot be demonstrated that on-street parking capacity would be sufficient to accommodate overspill, the council may <u>use Traffic Regulation Orders</u> add conditions to planning permissions to ensure that developments are 'permit free', i.e. that future occupants of a development are not eligible to apply for council-issued on-street parking permits.	Update to the policy wording to reflect the means by which the council can ensure developments are permit free.
MM29	Policy DM37 page 110	<i>Policy DM37 Green Infrastructure and Nature Conservation</i> <i>Amend first paragraph in Nature Conservation section of policy to read:</i> Development should avoid adverse impacts and All development should seek to conserve and enhance biodiversity and geodiversity features ensuring:	To ensure the policy wording is consistent with NPPF paragraph 180a.
	Policy DM37 page 110	DM37 Green infrastructure and nature conservation <i>Nature Conservation section. Amend first two bullet points to read:</i> <ul style="list-style-type: none"> • <u>accordance with the mitigation hierarchy requirements of the NPPF*(link to footnote);</u> • <u>an additional measurable net gain in biodiversity is achieved;</u> <i>Footnote to read:</i> The "mitigation hierarchy" is set out in <u>the NPPF paragraph 180</u> , the Biodiversity – code of practice for Planning and Development and the British standard for Biodiversity management (BS42020) 2013. In essence it seeks avoidance of harm; then mitigation; then compensation alongside new benefits for wildlife.	To ensure the policy wording is consistent with NPPF paragraphs 170b, 180 and 180c.
	Policy DM37 page 110	<i>Policy DM37 Green Infrastructure and Nature Conservation</i> <i>Amend bullet point list in Nature Conservation Section of policy to read:</i> <ul style="list-style-type: none"> • that recognised <u>protected and notable priority</u> species and habitats are protected and supported; 	To encompass a wider representation of species.

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	Policy DM37 page 110	<p>Policy DM37 Green Infrastructure and Nature Conservation Amend bullet point list under Nature Conservation section to read:</p> <ul style="list-style-type: none"> ancient woodland and irreplaceable habitats are protected that appropriate and long-term management of new or existing habitats is secured <u>and opportunities to connect habitats are secured</u> to ensure a network of nature recovery⁶⁷; and 	To better accord with NPPF paragraphs 179b and 180b.
	Policy DM37 page 110 Footnote 67	<p>Policy DM37 Green Infrastructure and Nature Conservation Amend footnote 67 to read:</p> <p>Nature recovery networks allows opportunities for <u>protection and</u> enhancement of existing nature assets including protected sites and wildlife-rich habitats, <u>and creation of new habitats</u>, to be identified and prioritised within a local area.</p>	To better reflect Nature Recovery Networks' aims and objectives.
	Policy DM37 page 111	<p>Policy DM37 Green Infrastructure and Nature Conservation Amend first paragraph of policy on page 111 that follows bullet point list to read:</p> <p>Proposals for development within a designated site of importance to nature conservation or which could impact upon a designated site must <u>also</u> satisfy the following criteria:</p>	Deletion of unnecessary text.
	Policy DM37 page 111	<p>Policy DM37 Green Infrastructure and Nature Conservation Amend Part A. Internationally protected sites to read:</p> <p><u>All development must comply with the Conservation of Habitats and Species Regulations (as amended) (link to new footnote).</u> Development likely to have significant effects on an international site (either individually or in combination with other plans or projects) and which would affect the integrity of the site will be subject to Habitat Regulations Assessment and will not be permitted unless the council is satisfied that:</p> <p>i) There is no alternative solution (which can be adequately demonstrated by the developer); <u>and</u></p>	To better reflect and accord with the Habitats and Species Regulations.

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		<p>ii) There are imperative reasons of overriding public health or public safety for the development; and</p> <p>iii) Adequate compensatory provision is secured.</p> <p><i>New footnote to read:</i> <u>The Conservation of Habitats and Species Regulations 2017 (as amended)</u></p>	
	Policy DM37 page 111	<p><i>Policy DM37 Green Infrastructure and Nature Conservation</i> <i>Amend Part B. Nationally protected sites to read:</i></p> <p>Development proposals should avoid impacts on nationally protected sites (<i>link to new footnote</i>). Development proposals likely to have an adverse effect on the site's notified special interest features will not be permitted, <u>unless the only exception is if:</u></p> <p>i) the benefits of the development, at this site, clearly outweigh <u>both</u> the likely impact to notified features on the site and any broader impacts on the network of nationally protected sites; and</p> <p>ii) the loss impacts can be mitigated in accordance with the mitigation hierarchy; through on or off site habitat creation to achieve a net gain in biodiversity/ geodiversity.</p>	To ensure consistency with the NPPF paragraph 180 and to reflect Government guidance that specifies biodiversity net gain is not applicable to statutory designations.
	Policy DM37 page 112	<p><i>Policy DM37 Green Infrastructure and Nature Conservation</i> <i>Move the first paragraph of page 112 and place as a footnote linked to the first sentence of Part B. Nationally protected sites. In addition, add text to footnote to refer to MCZ assessment.</i></p> <p><i>Footnote to read:</i></p> <p><u>#Development likely to have a significant effect on nationally protected sites will be required to assess the impact by means of an Environmental Impact Assessment. Development likely to have an effect on the Marine Conservation Zone will be required to assess the impact by means of a Marine Conservation Zone Assessment.</u></p>	Unnecessary as policy text. To ensure effectiveness of policy and reflect policy DM39.

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	Policy DM37 page 112	<p>Policy DM37 Green Infrastructure and Nature Conservation Amend policy at Part C. Locally protected sites to read:</p> <p>Unless allocated for development in the City Plan, d Development proposals that will result in an adverse effect on the integrity of any local site which cannot be either avoided or adequately mitigated will not be permitted, unless*(link to new footnote):</p> <p>i) the site is allocated for development in the City Plan or there are exceptional circumstances that justify the development of the site and can be demonstrated to outweighing the adverse effects on the local designation are clearly demonstrated; and</p> <p>ii) the loss impacts can be mitigated through on or off-site habitat creation; and to achieve a net gain in biodiversity/geodiversity.</p> <p>iii) on site or off site as part of a local strategic ecological network additional measurable net gains in biodiversity/geodiversity can be achieved.</p>	<p>To ensure effectiveness of policy.</p> <p>To ensure consistency with NPPF paragraph 179a.</p> <p>To ensure consistency with NPPF paragraph 179b and Environment Act.</p>
	Policy DM37 page 112	<p>Policy DM37 Green Infrastructure and Nature Conservation Move the final paragraph of Part C Locally Protected Site and place as a footnote linked to the first sentence of Part C. Locally protected sites.</p> <p>Footnote to read:</p> <p><u>#Development proposals considered to have a significant effect on local sites will be required to assess the impact by means of an Ecological Impact Assessment.</u></p>	<p>Unnecessary as policy text.</p>
	Policy DM37 page 112	<p>Policy DM37 Green Infrastructure and Nature Conservation Move and amend the following section of the final paragraph from page 112 to follow the bullet point list on page 111. Paragraph reads:</p> <p>Proposals liable to affect green infrastructure and nature conservation features either directly or indirectly must be supported by an appropriate and detailed site investigation/assessment and accord with provisions set out in the mitigation hierarchy71. Measures to avoid or prevent harmful effects will be required.</p>	<p>To clarify this section of the policy applies to all sites, whether designated or not.</p>

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	Policy DM37 p.112	<p>Policy DM37 Green Infrastructure and Nature Conservation <i>Move and amend the following section of the final paragraph from page 112 to follow the new proposed section heading entitled “Designated Sites” on page 111 and prior to existing paragraph that reads “Proposals for development within a designated site of importance to nature conservation...”</i></p> <p><u>Designated Sites</u> Where proposals are liable to cause direct or indirect harm <u>impact</u> to a designated sites, they must provide:</p> <ul style="list-style-type: none"> a) evidence to demonstrate that the objectives of the designation and integrity of the area will not be undermined; b) funded management plans that secure the long term protection and enhancement of remaining features⁷²; and c) up-to-date information about the biodiversity/geodiversity which may be affected, and how loss can be mitigated to achieve measurable net gains. 	To ensure consistency with NPPF paragraph 180 and to improve effectiveness of policy.
	Supporting text to Policy DM37 paragraph 2.275 page 112	<p>Policy DM37 Green Infrastructure and Nature Conservation <i>Amend the second sentence of paragraph 2.275 of the supporting text to read:</i></p> <p>A development proposal’s impact upon the natural environment must be considered early in the design process, including cumulative <u>and in-combination</u> impacts and impacts upon the wider environment.</p>	To reflect good practice.
	Supporting text to Policy DM37 paragraph 2.278 page 114	<p>Policy DM37 Green Infrastructure and Nature Conservation <i>Amend the final paragraph 2.278 of supporting text to read:</i></p> <p>The opportunity for nature recovery networks should be considered in accordance with <u>regards to</u> the emerging Natural Capital Investment Strategy for Sussex and future Local Nature Recovery Strategies, which will become a requirement under the Environment Act. Any invasive non-native</p>	To clarify the status of these guidance documents as material considerations but do not have full weight of a Development

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		species should be removed in accordance with legislation <u>and having regard to best practice guidance</u> (see also DM40 Protection of the Environment and Health – Pollution and Nuisance).	Plan/legislation. To reflect forthcoming legislation. To reflect practice.
	Supporting text to Policy DM37 paragraph 2.279 page 114	<i>Policy DM37 Green Infrastructure and Nature Conservation</i> <i>Amend paragraph 2.279 to read:</i> The council will continue to work with the Brighton and Lewes Downs UNESCO Biosphere partners, including the South Downs National Park Authority and other surrounding authorities, to secure a landscape scale approach to biodiversity and green infrastructure <u>as recommended by People and Nature Network (PANN) 2020, which builds upon the Sussex Natural Capital Investment Strategy.</u>	To reflect local strategy.
	Supporting text to Policy DM37 paragraph 2.281 page 115	<i>Policy DM37 Green Infrastructure and Nature Conservation</i> <i>Amend fourth sentence of paragraph 2.281 to read:</i> All new build, refurbishment, and renovation schemes should incorporate swift boxes and bee bricks where possible ensuring their installation follows best practice guidance <u>including local guidance set out in the Guidance Note for Provision of Swift Boxes in New Development, 2020.</u>	For thoroughness and to ensure cross-references to all relevant guidance are included.
	Supporting text to Policy DM37 paragraph 2.282 page 115	<i>Policy DM37 Green Infrastructure and Nature Conservation</i> <i>Amend eighth sentence to supporting text at paragraph 2.282 to read:</i> Alongside this, opportunities should be explored to provide new benefits for wildlife <u>to deliver measurable biodiversity net gains.</u>	To clarify links to biodiversity net gain.
	Supporting text to Policy DM37 paragraph 2.282 page 115	<i>Policy DM37 Green Infrastructure and Nature Conservation</i> <i>Add sentence to end of paragraph 2.282 to read:</i> <u>Nature-based solutions to carbon storage and sequestration should also be sought.</u>	To support the council's ambition to achieve carbon neutrality.

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	Supporting text to Policy DM37 page 115	<p>Policy DM37 Green Infrastructure and Nature Conservation <i>Add new paragraph after existing paragraph 2.282. New paragraph to read:</i></p> <p><u>In addition to any measures required to mitigate impacts, net gains in biodiversity should also be achieved. Biodiversity net gain should be delivered on site where possible, or off site as appropriate and should still be secured where proposals have negligible or no adverse impacts on biodiversity. The Sussex Local Nature Partnership (LNP) has an ambition to achieve a 20% target for biodiversity net gain from developments. The council will work with the LNP to bring forward evidence to support this target. The updated SPD will also address biodiversity net gain and include examples of achievable targets.</u></p>	To reflect net gain principles. To reflect Sussex Local Nature Partnership ambition for net gain target and forthcoming update to Nature Conservation SPD.
	Supporting text to Policy DM37 page 115	<p>Policy DM37 Green Infrastructure and Nature Conservation <i>Add new supporting text paragraph prior to the section entitled "Designated Sites" and new footnote to read:</i></p> <p><u>In relation to Part C of the policy, examples of exceptional circumstances include development required in relation to flood defences or coastal management, key infrastructure that meets the wider needs of the city, and transport related infrastructure. Where land within locally designated sites is subject to an allocation for development in the City Plan* (new footnote), it is considered that the exceptional circumstances required under section C i) of the policy have been demonstrated specifically through the examination and adoption of the City Plan Part One and the need to plan positively for housing within the context of a significant citywide housing shortfall. However, any development proposals on these sites will still be required to meet the requirements under section C ii) and C iii) for mitigation and net gain in biodiversity/geodiversity as well as requirements relating to ecological assessment.</u></p> <p><i>Footnote to read:</i> <u>This applies to a small number of housing sites allocated in Policy H2 and one site allocated in Policy H1.</u></p>	To ensure policy wording is clear and unambiguous.

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	Supporting text to Policy DM37 paragraph 2.283 page 115	<p>Policy DM37 Green Infrastructure and Nature Conservation <i>Amend paragraph 2.283 to read:</i></p> <p>However, Castle Hill is designated a Special Area of Conservation (SAC) and lies within the South Downs National Park and the administrative area of the city council <u>and there are several designated European sites (SPAs and SACs) elsewhere within East and West Sussex. Large scale development within the City Plan area may still detrimentally affect the SAC by reason of additional pressure from visitors and traffic. As part of the preparation of City Plan Part Two, the council has undertaken a Habitats Regulations Assessment which concluded that the development proposed in the plan will not have significant adverse impacts on any designated European sites within 20km of the plan area boundary.</u></p>	To clarify the presence of other European sites within East/West Sussex and to reflect the findings of the Habitats Regulations Assessment undertaken on City Plan Part Two.
	Supporting text to Policy DM37 paragraph 2.284 page 115	<p>Policy DM37 Green Infrastructure and Nature Conservation <i>Add new sentence at end of paragraph 2.284 to read:</i></p> <p><u>National sites also include Marine Conservation Zones (MCZ), designated through the Marine and Coastal Access Act 2009. The Beachy Head West MCZ lies partly within the City Plan area.</u></p>	To rectify omission.
MM30	Policy DM39 page 119	<p>Policy DM39 Development on the Seafront <i>Amend part a) of policy to read:</i></p> <p>a) accord with <u>have regard to</u> the relevant Shoreline Management Plan and Coastal Strategy Study[#];</p> <p>include new footnote: <u>#Beachy Head to Selsey Bill Shoreline Management Plan 2006; Brighton Marina to Saltdean Strategy 2001 and Brighton Marina to River Adur Strategy 2014 or their updates.</u></p>	To clarify the status of these management plans and strategies as material considerations but do not have full weight of a Development Plan. Strategies are named in full in new footnote.
	Policy DM39 page 119	<p>Policy DM39 Development on the Seafront <i>Amend last paragraph of policy to read:</i></p>	To ensure the policy wording is clear and

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		All developments providing sea-based activities or with a potential impact upon the marine environment should have appropriate regard to the Beachy Head West Marine Conservation Zone and be in accordance with the South Marine Plans. <u>Development that would be likely to have an adverse impact on designated sites including the Beachy Head West Marine Conservation Zone will need to accord with DM37 Green Infrastructure and Nature Conservation. Development likely to have an effect on the Marine Conservation Zone will be required to assess the impact by means of a Marine Conservation Zone Assessment.</u>	consistent with Policy DM37 and NPPF paragraph 180.
	Supporting text to Policy DM39 paragraph 2.300 page 120	<i>Policy DM39 Development on the Seafront</i> <i>Amend Supporting text at end of sentence at paragraph 2.300 to read:</i> The council will seek to ensure that any new or enhanced sea defences integrate sensitively with the local environment <u>and avoid an adverse impact on nature conservation assets in accordance with Policy DM37 Green Infrastructure and Nature Conservation.</u>	To clarify that any adverse impacts should be considered against the requirements of Policy DM37.
MM31	Policy DM40 Page 122	<i>DM40 Protection of the Environment and Health – Pollution and Nuisance</i> <i>Amend criteria a)iii to read:</i> iii. Appropriate measures can and will be incorporated to attenuate/mitigate existing and/or potential problems in accordance with national <u>policy</u> and <u>having regard to national and</u> local guidance; and	To clarify the status of these guidance documents as material considerations but do not have full weight of a Development Plan/ national policy.
	Policy DM40 page 122	<i>DM40 Protection of the environment and health-pollution and nuisance</i> <i>Amend and combine criteria (e) and (f) to read:</i> (e) particular regard must be given to <u>assess</u> the impacts of emissions from transport, flues, fixed plant, and, heat and power systems. (f) New biomass combustion and CHP plants associated with	To ensure the policy wording is clear and unambiguous.

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		major developments will not be acceptable in or near an Air Quality Management Area and sensitive receptors such as the Royal Sussex County Hospital due to the need to comply with nitrogen dioxide limits; and	
	Policy DM40 Page 123	<i>DM40 Protection of the Environment and Health – Pollution and Nuisance</i> <i>Amend criteria (g) to read:</i> g) ensure outdoor lighting is well designed; low impact; efficient; the minimum necessary with an appropriate balance between intensity, fittings, height and structures; and, not cause unacceptable detriment to <u>health and amenity</u> , public & highway safety, biodiversity, in particular priority habitats and species, the night sky and the South Downs National Park International Dark Sky Reserve.	To ensure the policy wording is consistent with NPPF para 185(c).
	Supporting text to Policy DM40, para 2.305 page 123	<i>Policy DM40 Protection of the environment and health-pollution and nuisance</i> <i>Amend supporting text paragraph 2.305 to read:</i> Two Six Air Quality Management Areas (AQMA's) are currently designated within the city; one covering the city centre, <u>Rottingdean, South West Portslade, Sackville Road-Old Shoreham Road, South Road-Preston Road, and Eastern Road (Hospital), and Portslade, and a second smaller area that includes Rottingdean High Street and its junction with the A259.</u>	Factual update to reflect the new AQMA 2020 designation.
	Policy DM40 paragraph 2.311 page 125	<i>DM40 Protection of the environment and health-pollution and nuisance</i> <i>Amend 4th sentence of paragraph 2.311 to read:</i> Any noise impact study and noise assessment must be carried out in accordance with current authoritative guidance and British Standards <u>and having regard to the local noise action plan</u> ⁸⁹ .	To clarify the status of these guidance documents as material considerations but do not have full weight of a Development Plan/ national policy.

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	Supporting text to Policy DM40 paragraph 2.314 page 125	<p>DM40 Protection of the Environment and Health – Pollution and Nuisance</p> <p><i>Amend supporting text paragraph 2.314 as follows:</i></p> <p>2.314 <u>Criteria g applies to any proposals which involve the installation of external lighting and where the design of developments may result in light spill from internal lighting.</u> Development proposals should avoid excessive and unnecessary lighting <u>to limit the potential for impacts on human health and biodiversity</u>, whilst at the same time recognising the important role of lighting in optimising the effective use of land outside daylight hours and addressing crime and antisocial behaviour (such as floodlighting for the extension of operating hours/crime deterrent). <u>Lighting design should have regard to the Institute of Lighting Professionals (ILP) Guidance Note 1 for the Reduction of Obtrusive Light (2020).</u> In May 2016 the South Downs National Park was designated as an International Dark Sky Reserve (IDSR). Lighting within the setting of the National Park should therefore take particular care to avoid unnecessary direct or reflected illumination of the sky at night.</p>	For clarity and to better accord with NPPF para 185(c). To ensure cross-reference to all relevant guidance.
MM32	Policy DM41 page 126	<p>DM41 Polluted and hazardous substances and land stability</p> <p><i>Amend first sentence of policy to read:</i></p> <p>Development proposals must ensure that <u>Planning permission will be granted for developments that can demonstrate</u> they do not prejudice health, safety, natural capital and the quality of the city's environment.</p>	To ensure the policy wording is clear and unambiguous.

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MM33	Policy DM43 page 131	<p>Policy DM43 Sustainable Drainage Amend first sentence of third paragraph of policy to read:</p> <p>SuDS should be sensitively located and designed <u>from the outset, in line with having regard to recognised best practice⁹⁷, the Urban Design Framework SPD and in accordance with the Sustainable Drainage SPD</u> to ensure that the quality of local water is not adversely affected;</p>	To clarify the status of these guidance documents as material considerations but do not have full weight of a Development Plan and to include reference to the adopted Urban Design Framework as relevant local guidance.
	Supporting text 2.333 to Policy DM43 page 132	<p>Policy DM43 Sustainable Drainage Amend paragraph 2.333 to read:</p> <p>2.333 The choice of appropriate sustainable drainage measures for a site/development should be informed by specific catchment and ground characteristics, and will require the early <u>design stage</u> consideration of a wide range of issues relating to the <u>design, location, management, long term adoption and maintenance of SuDS. A landscape-led approach to sustainable drainage techniques should be undertaken. Best practice and detailed guidance is set out in the South East Authorities Water People Places masterplanning guidance together with the Urban Design Framework SPD, the Sustainable Drainage SPD and the CIRIA (2015) guide for master planning sustainable drainage into developments.</u></p>	To clarify that consideration of SUDs should be undertaken early in the design stage encouraging a landscape-led/ masterplanning approach and to refer to relevant local guidance.
MM34	Policy DM44 page 134	<p>Policy DM44 Energy Efficiencies and Renewables Amend first sentence of policy to read:</p> <p>The council will encourage all development to improve energy efficiency and achieve greater reductions in CO2 emissions in order to contribute towards Brighton & Hove's ambition to become a carbon neutral city by 2030. In addition to the requirements set out in Policy CP8 Sustainable Buildings[#], the following standards of energy efficiency and energy performance will be required</p>	In response to discussions during the examination hearings in order to clarify the application of the policy in combination with Policy CP8.

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		<p>unless it can be demonstrated that doing so is not technically feasible and/or would make the scheme unviable:</p> <p><i>Add New Footnote: #Policy CP8 sets out the energy performance and water efficiency standards for residential new build and the BREEAM standards for non-residential and greenfield development.</i></p>	
	Policy DM44 Page 134	<p><i>DM44 Energy Efficiency and Renewables</i></p> <p><i>Amend parts one and two of the Policy to create four parts and to read:</i></p> <ol style="list-style-type: none"> All development including conversions and change of use of existing buildings to new residential dwellings to achieve at least 19% improvement on the carbon emission targets set by Part L (2013) until the Future Homes Standard or any interim uplift in Part L which exceeds 19% improvement come into effect unless superseded by national policy or legislation;¹⁰⁰ <u>Non-residential development (major and non-major[#]) including conversions and changes of use to achieve at least 19% improvement on the carbon emission targets set by Part L (2013) until the Future Buildings Standards or any interim uplift in Part L which exceeds 19% improvement come into effect.</u> All development to achieve a minimum Energy Performance Certificate (EPC) rating of: <ol style="list-style-type: none"> <u>A minimum Energy Performance Certificate EPC rating 'C' for conversions and changes of use of existing buildings to residential and non-residential use¹⁰¹.</u> <u>A minimum Energy Performance Certificate EPC rating 'B' for new build residential and non-residential development.</u> <p><i>Insert new footnote:</i> <i>#As defined in the supporting text to Policy CP8 at Table 6</i></p>	<p>In response to discussions during the examination hearings sessions in order to clarify the application of the required standards set out in the policy.</p> <p>To futureproof the policy with respect to the emerging Future Homes Standards and Future Building standards.</p> <p>For clarity</p>
	Policy DM44 Page 134	<p><i>DM44 Energy Efficiency and Renewables</i></p> <p><i>Amend part footnote 100 to read:</i></p>	To future proof policy with respect to the

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		100 including changes to Part L of the Building Regulations or the approved calculation methodology. <u>Following consultation, the government has indicated in its response to the Future Homes Standard consultation (The Future Homes Standard: 2019 Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings, January 2021) that it will introduce a Future Homes Standard and a Future Buildings Standard for non-domestic buildings in 2025 and an interim uplift to Part L will come into effect in June 2022.</u>	Future Homes Standard and Future Buildings standards
	Policy DM44 Pages 134 -135	<i>DM44 Energy Efficiency and Renewables</i> <i>Amend first sentence of last paragraph of policy to read:</i> All <u>major residential and non-residential development</u> will be expected to submit an energy statement to provide details of the <u>building fabric energy efficiency and low and zero carbon energy technologies used including the size/capacity of the systems and the estimated CO2 savings that will be achieved.</u> Through preparation of the technical guidance the LPA will review and clarify what developers provide in the Energy Statement to ensure their robustness. For example, ensuring the statement will clearly set out how each element of the design will help to achieve carbon reductions.	In response to discussions during the examination hearings to clarify the requirements for supporting information should not be overly onerous in relation to non-major development.
	Policy DM44 paragraph 2.335 Page 135	<i>DM44 Energy Efficiency and Renewables</i> <i>Amend paragraphs 2.335 of supporting text to read:</i> 2.335 The purpose of this policy is to ensure that development delivers secure, affordable, low carbon growth, increases future energy resilience, and delivers the strategic objectives of City Plan Part One to become a zero- carbon city by 2050 ¹⁰² . This policy sets out the further steps the council will take to reduce carbon emissions associated with all new development...	In response to discussions during the examination hearings to clarify the application of the policy.

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	Supporting text to Policy DM44 para. 2.345 Page 137	<p>DM44 Energy Efficiency and Renewables <i>Amend paragraph 2.345 of supporting text to read:</i></p> <p>To ensure the assessment of new development better reflects the actual carbon emissions associated with their expected operation, planning applicants are required to use the government's updated carbon emission factors (SAP 10.1 or subsequent versions <u>updates</u>). It is anticipated that on developments where carbon savings from certain technologies (e.g. gas-engine CHP and solar PV) do not achieve the carbon savings set out in meet <u>City Plan Part One Policy CP8, fabric energy efficiency measures and</u> alternative or additional technologies will need to be utilised to meet the 19% improvement against part L 2013.</p>	To future proof the policy with respect to the Future Homes Standard and Future Buildings standards.
	Supporting text to Supporting text to Policy DM44 page 137	<p>DM44 Energy Efficiency and Renewables <i>Add new paragraph after the supporting text in paragraph 2.345 to read:</i></p> <p><u>New paragraph: The government indicated in January 2021* its intention to introduce the Future Homes Standard and Future Buildings Standards in 2025 with interim uplifts to Part L anticipated to come into effect in June 2022. For new homes, the interim uplift in Part L will be expected to produce 31% less CO2 emissions compared to current standards. The 19% improvement against part L 2013 will continue to apply until superseded by 2025 standards or any interim uplifts in Part L brought into effect before 2025 if these are higher than the 19%. In order for the city to achieve greater reductions in CO2 emissions and to meet the council's aspiration to become a carbon neutral city by 2030 the council will encourage developers to work towards the interim uplift in Part L before it comes into effect.</u></p> <p><u>*Add new footnote: The Future Homes Standard: 2019 Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings, January 2021.</u></p>	To future proof policy with respect to the Future Homes and Buildings standards
	Supporting text to Policy DM44 paragraph 2.346 page 137	<p>DM44 Energy Efficiency and Renewables <i>Amend first sentence of paragraph 2.346 of supporting text to read:</i></p>	To ensure the wording is clear and unambiguous.

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		2.346 If a developer can demonstrate that there is a technical or financial reason why this <u>the 19% improvement against Part L 2013</u> target cannot be achieved they would be expected to deliver as close to this target as possible.	
	Supporting text to Policy DM44 paragraphs 2.351, 2.359 and 2.361 pages 138 -140	<p>DM44 Energy Efficiency and Renewables</p> <p><i>Delete paragraph 2.351, and amend 2.359 – 2.361 of supporting text to read:</i></p> <p>2.351 Developers are required to confirm the predicted EPC ratings for all buildings when submitting a planning application, to submit a copy of the final EPC to the planning on completion. It is assumed no additional work will be required from the developer as it is a legal requirement to produce a draft EPC before work starts on site and a final EPC at completion for submission.</p> <p>...</p> <p>2.359 For major residential and non-residential development, the achievement of the CO2 emission reduction standard can be demonstrated through an Energy Statement prior to commencement of development.</p> <p><i>Split 2.359 to create new paragraph:</i></p> <p>At post construction stage, achievement of the standard can be demonstrated <u>as follows: for dwellings, through final ‘as built’ reports produced for Building Regulations compliance e.g. SAP (Standard Assessment Procedure) for dwellings or EPC; and for non-residential development, through SAP, EPC and /or SBEM (Simplified Building Energy Model) or BRUKL (Building Regulations UK Part L) for non-domestic development.</u> The council will <u>also expect ‘as built’ reports for larger non-domestic developments to demonstrate compliance to Policy CP8 BREEAM standards by producing a BREEAM final certificate, ie: most developments should meet BREEAM UK New Construction assessment; shell only developments should meet BREEAM UK New Construction ‘Shell only’ assessment; and refurbishment and fit-out should meet BREEAM UK Refurbishment and Fit- out Parts 2, 3 or 4 assessments as appropriate.</u></p>	<p>In response to discussions during the examination hearings to clarify the requirements for supporting information should not be overly onerous in relation to non-major development.</p> <p>To include references to the emerging Future Homes Standard and Future Homes Building.</p>

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		<p>2.360 If required, Detailed information relating to the specific information required, format and presentation of this information in Energy Statements will be set out in a technical guidance document to ensure consistency of reporting and evidence requirements.</p> <p>2.361 This <u>Energy</u> Statement should provide details of the low and zero carbon energy technologies used including the size/capacity of the systems and the estimated CO2 savings that will be achieved. A technical guidance document will be produced to provide support on the specific information required to demonstrate compliance as well as guidance on passive design, good building fabric and avoiding over-heating.</p>	To ensure the wording is clear and unambiguous.
MM35	Policy DM46, page 143	<p><i>DM46 Heating and cooling network infrastructure</i> <i>Amend the second paragraph of the policy to read:</i></p> <p>Where proposals come forward with combined heat and power (CHP) they must meet CHP Quality Assurance standards (CHPQA)¹²⁰ and demonstrate that heating and cooling systems have been selected in accordance with the heating and cooling hierarchy, and CIBSE Heat Network Code of Practice¹²¹ and address the requirements in Policy DM40 <u>and have had regard to the CIBSE Heat Network Code of Practice¹²¹;</u></p>	To clarify the status of the code of practice as a material consideration but does not have full weight of a Development Plan/ national policy.
MM36	Policy SA7, page 156	<p><i>SA7 Benfield Valley</i> <i>Amend first sentence of policy to read:</i></p> <p>Land at Benfield Valley <u>as shown on the Policies Map</u> will be protected and enhanced as an important green wedge into the urban area, a valued Local Wildlife Site and Local Green Space.</p>	To ensure the policy wording is clear and unambiguous.
	Supporting text to Policy SA7, paragraph 3.9, page 158	<p><i>SA7 Benfield Valley</i> <i>Amend paragraph 3.9, first bullet point to read:</i></p> <p>A Landscape and Visual Character <u>Impact</u> Assessment¹³⁹ which will inform landscape led masterplans for development sites and associated</p>	To clarify that a Landscape and Visual Impact Assessment will be required to

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		¹³⁹ To be carried out in accordance with Guidelines for Landscape and Visual Impact Assessment 3 rd Edition (Landscape Institute and IEAM 2013).	support development proposals.
MM37	Policy SSA1, page 153	SSA1 Brighton General Hospital Site, Elm Grove, Freshfield Road Amend Policy to read: <ul style="list-style-type: none"> • 10,000 – 12,000 sq m health and care facility (D1E(e)); 	To ensure consistency with changes to the Use Classes Order, as amended pursuant to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020
	Policy SSA1 Page 153	SSA1 Brighton General Hospital Site, Elm Grove, Freshfield Road Amend requirements a) and b) of the Policy to read: <p>a) Achieve a high quality of design which preserves and where possible enhances the setting of the Grade II Listed Building and the most significant non-designated heritage assets and where possible enhances the setting of the listed building. A comprehensive Heritage Impact Assessment will be required;</p> <p>b) Create active frontages along Freshfield Road and Pankhurst Road through selective openings on the flint wall that do not undermine the heritage character <u>and appearance of the wall.</u></p>	To clarify the requirements in respect of the heritage assets.
	Supporting text to Policy SSA1 Page 154	SSA1 Brighton General Hospital Site, Elm Grove, Freshfield Road Amend paragraph 3.12 of the supporting text to read: <p>The main Brighton General Hospital Arundel Building and the later built infirmary blocks form a prominent group of landmark buildings on the high ridge on the east side of Brighton. The site occupies an elevated position with extensive viewpoints from across the city and requires a high quality architectural response. The Arundel Building is a Grade II listed building and was <u>originally</u></p>	To ensure the wording is clear and unambiguous and to clarify the term 'heritage character'.

Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification
		formerly used as the city's workhouse. There are a number of 19th Century Infirmary and Workhouse Blocks located within the <u>curtilage setting</u> of the principal listed building that and are therefore also may be curtilage listed or non-designated heritage assets. <u>The site is attractively bounded by continuous high flint walls with brick piers that hold a heritage character deriving from the strong sense of enclosure they create and the use of local vernacular construction and materials.</u> Development proposals with the potential to affect the listed building or its settings should be supported by <u>a appropriately scaled</u> Heritage Impact Assessments.	
	Supporting text to Policy SSA1, Paragraph 3.18 page 155	<p>SSA1 Brighton General Hospital Site, Elm Grove, Freshfield Road Delete last two sentences of paragraph 3.18 and create new paragraph to read:</p> <p>The site holds around 15 swift nests considered to be the oldest swift breeding colony in Brighton and Hove and thus offers a unique opportunity to safeguard and enhance biodiversity. Any new scheme will be required to make provision for installing and maintaining swift boxes in appropriate locations.</p> <p><u>New paragraph: The site is understood to hold around 15 to 20 swift nests that are considered to be the oldest and largest swift breeding colony in Brighton and Hove and thus the site offers a unique opportunity to safeguard and enhance biodiversity. Any new scheme will be required to make robust and appropriate provision to safeguard, protect and support the swift colony throughout the entirety of the development phasing: demolition, construction and operation. Any demolition should not occur before the end of a swift breeding season. A phased approach to both demolition and construction may be necessary as part of measures to provide an interim solution to safeguard the colony which could include the provision of additional swift bricks/boxes on remaining existing on-site buildings. Interim solutions will need to be proven to be successful.</u></p>	In response to discussions at examination hearing sessions new wording provides detail in the supporting text regarding the need to provide robust and appropriate provision to safeguard, protect and support the swift colony throughout the entirety of the development phasing
MM38	Policy SSA2, page 156	<p>SSA2 Combined Engineering Depot, New England Road Amend policy at first paragraph second bullet point policy to read:</p>	To ensure consistency with changes to the Use Classes Order, as

Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification
		<ul style="list-style-type: none"> the provision/replacement of a minimum of 1,000 sq m B1 <u>E(g)</u> workspace and managed starter office units. 	amended pursuant to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020
	Policy SSA2 Page 156	<p><i>SSA2 Combined Engineering Depot, New England Road</i> <i>Amend paragraph 3.23 of the supporting text to read:</i></p> <p>Brighton mainline station is a Grade II* listed building, the Railway Bridge is Grade II listed and the site is situated adjacent to West Hill Conservation Area. <u>The site itself may contain railway heritage buildings that meet the criteria for non-designated heritage assets (see DM28 ‘Locally Listed Heritage Assets’).</u> Building heights and massing should respect strategic city wide views and enhance the setting of nearby heritage assets (see DM29 ‘The Setting of Heritage Assets’). <u>A Heritage Impact Assessment will be required with any application for the site.</u></p>	To clarify the heritage assets relevant to the site and how potential heritage impacts should be identified.
MM39	Policy SSA3, page 158	<p><i>SSA3 Land at Lyon Close, Hove</i> <i>Amend policy to read:</i></p> <p><i>(Second paragraph, first bullet point)</i></p> <ul style="list-style-type: none"> the retention/ replacement of a minimum of 5,700 sq m net B1a <u>E(g)</u> office floorspace through the mixed use development of the following sites: <p><i>(Second paragraph, third bullet point)</i></p> <ul style="list-style-type: none"> expanded Ð1 health facilities (GP surgery) and/or community uses subject to demonstration of need and deliverability; and <p><i>(Third paragraph)</i></p> <p>Should the retail warehouse units¹³⁴ come forward for redevelopment during the Plan period then the council will seek a mix of B1 <u>E(g)</u> business and residential uses.</p>	To ensure consistency with changes to the Use Classes Order, as amended pursuant to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020

Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification
		<p>(Fourth paragraph, criterion b.)</p> <p>All proposals, including changes in existing business uses (Use Class B1-B8) (<u>Use Classes E(g), B2 and B8</u>), will be expected to contribute to the provision of a range of office and flexible workspaces including medium floor plate offices and start up business floorspace suitable for small business;</p>	
	Supporting text to Policy SSA3, para 3.27, page 160.	<p>SSA3 Land at Lyon Close, Hove Amend last sentence of supporting text at paragraph 3.27 to read:</p> <p>However, proposals for tall buildings will need to be tested for visual impact from key viewpoints, <u>be in accordance with as well as taking into account City Plan Part One policies and have regard to the supplementary guidance on tall buildings (to be reviewed in the forthcoming set out in SPD17 Urban Design Framework).</u></p>	To reflect adoption of SPD17 Urban Design Framework in July 2021 and to be precise on the weight to be attached to Development Plan policies/ SPDs.
MM40	Policy SSA4, page 161	<p>SSA4 Sackville Trading Estate and Coal Yard Amend policy first paragraph, second bullet point to read:</p> <ul style="list-style-type: none"> • A minimum of 6000m2 E(g)B1-employment floorspace 	To ensure consistency with changes to the Use Classes Order, as amended pursuant to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020
	Policy SSA4 Page 162	<p>SSA4 Sackville Trading Estate and Coal Yard Add criterion (k) to policy to read:</p> <p><u>k) Development must ensure that groundwater sources are protected to the satisfaction of the Environment Agency.</u></p>	To reflect advice from the Environment Agency and for consistency with other strategic site allocations.

Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification
	Supporting text to Policy SSA4, paragraph 3.37 Page 162	<p>Policy SSA4 – Sackville Trading Estate and Coal Yard Amend paragraph 3.37 to read:</p> <p>The Hove Station area is identified in the Tall Buildings <u>Urban Design Framework SPD</u>¹³⁸ as having opportunities for tall building development.</p>	Factual Update to reflect adoption of the Urban Design Framework SPD
	Supporting text to Policy SSA4 Page 162	<p>SSA4 Sackville Trading Estate Amend supporting text at paragraph 3.38 to read: “An Air Quality Management Area extends along Sackville Road to the junction with Old Shoreham Road. The effect of the new development on this the AQMA <u>at the junction of Sackville Road and Old Shoreham Road</u> will require careful consideration in order to achieve compliance with the requirements of Policies CP9 Sustainable Transport and DM40 Protection of the Environment -Pollution and Nuisance.”</p>	Factual update to reflect 2020 revised AQMA
	Supporting text to Policy SSA4 paragraph 3.39 Page 163	<p>Policy SSA4 – Sackville Trading Estate and Coal Yard Amend paragraph 3.39 with additional sentence at end of paragraph:</p> <p><u>The Hove Station Area Supplementary Planning Document (adopted 16 September 2021) provides guidance on improving linkages in and from the Hove Station Area which is adjacent to this site.</u></p>	Factual update to reflect Hove Station Area SPD was adopted 16 September 2021.
	Footnote 138 Page 162	<p>Policy SSA4 – Sackville Trading Estate and Coal Yard Amend footnote 138 to read:</p> <p>www.brighton-hove.gov.uk/sites/brightonhove.gov.uk/files/downloads/localplan2001/15_SPGBHTall_buildings.pdf <u>www.brighton-hove.gov.uk/planning-and-building-regulations/spd17-urban-design-framework-supplementary-planning-document-udf</u></p>	Factual update to reflect adoption of the Urban Design Framework SPD

Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification
MM41	Policy SSA5, page 164	<p>SSA5 Madeira Terrace and Madeira Drive Amend Policy SSA5 to read:</p> <ul style="list-style-type: none"> • Retail uses (Use Classes A1, A3, A4, A5 <u>E (a), E (b), public house, wine bar, or drinking establishment (Sui Generis) and hot food takeaway for the sale of hot food where consumption of that food is mostly undertaken off the premises (Sui Generis)</u>); • Commercial space (Use Class B1-E <u>(g)</u>); • Small scale/ boutique hotel <u>visitor accommodation</u> (Use Class C1); • Galleries/museum(s) (Use Classes D1F1 <u>(b) and F1(c)</u>); and/or • Leisure uses (Use Classes D2 <u>E (d) and F2</u>) appropriate to the character of the seafront. 	To ensure consistency with changes to the Use Classes Order, as amended pursuant to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 and to clarify the scale/ type of visitor accommodation.
	Policy SSA5 Page 164	<p>SSA5 Madeira Terrace and Madeira Drive Amend second paragraph of policy to read:</p> <p>Planning permission will be granted for proposals that accord with the Development Plan <u>and respect the significance of the Grade II* Madeira Terrace and other associated designated and undesignated heritage assets, prioritising their repair and restoration</u> and meet the following site specific requirements:</p>	Factual update of listing status of heritage assets and to emphasise that proposals will be expected to respect the heritage assets.
	Supporting text to Policy SSA5 paragraph 3.44 page 165	<p>SSA5 Madeira Terrace and Madeira Drive Amend first sentence of supporting text at paragraph 3.44 and add new sentence to end of the paragraph to read:</p> <p>Madeira Terrace is a Grade II listed unique structure running half a mile along the seafront and includes 151 separate arches, a Victorian promenade with raised walkway, access stairs, associated buildings and lift towers. It is considered to be the longest cast iron structure in Britain, running from the Aquarium Colonnade to the Volk's Railway maintenance building. Since 2012 Madeira Terrace has been closed to the public as the structure has degraded and become unsafe.</p>	Factual update of listing status of heritage assets.

Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification
		<u>Madeira Terrace, Lift and Shelter Hall have been re-graded to II* and have been added to the Historic England list of heritage assets at risk. The East Cliff Conservation Area, within which Madeira Terrace plays a key part, has also been identified as at risk.</u>	
	Policy SSA5 paragraph 3.45 page 165	<p><i>SSA5 Madeira Terrace and Madeira Drive</i> <i>Amend first, third and fourth sentence of supporting text at paragraph 3.45 to read:</i></p> <p>The council is committed to the retaining, restoring and reactivating the Grade II* listed structure. The council has allocated £13.4million funding for Madeira Terraces restoration. The renovation of Madeira Terrace will need to be sensitive to the structure's unique <u>and intrinsic heritage value and informed by a Conservation Management Plan which will be a material planning consideration.</u> and Proposals will need to be financially sustainable commercially viable in order to pay for its contribute to its restoration and long term maintenance. A potential option is to develop new uses and activities within It is likely that a variety of commercial uses will be placed in the arches of Madeira Terrace.</p>	Factual update to refer to the Conservation Management Plan and updated listing status.
	Supporting text to Policy SSA5 paragraph 3.46 page 165	<p><i>SSA5 Madeira Terrace and Madeira Drive</i> <i>Amend paragraph 3.46 of supporting text to read:</i></p> <p>Uses should be complementary to the area and the vision for this part of the seafront and could include a wide variety of uses such as cafes, bars, restaurants, boutique retail, an arts centre/ Heritage Interpretation and Learning centre, an outdoor sports activity centre, museum space, a hub for creative industries with incubator/ workspace and small scale/ <u>boutique visitor accommodation (with limited service)</u> boutique hotel. However, residential use will not be permitted. Careful consideration needs to be given to the relationship and connection between potential the businesses within the arches and <u>Madeira Terrace's historic use for walking and as a 'grandstand' and the wider area's ongoing role as Brighton and Hove's premier events space and the beach. An initial phase of repair or regeneration is likely to inform a holistic strategy for Madeira Terrace*.</u></p>	Factual update to refer to the council's Madeira Terrace 30 Project and to clarify the scale and type of visitor accommodation.

Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification
		<i>And add new footnote: [#]The Madeira Terrace 30 Project was commissioned in 2020 to consider the initial phase of repair and regeneration of part of the Madeira Terrace.</i>	
	Supporting text to Policy SSA paragraph 3.47 page 165	<p>SSA5 Madeira Terrace and Madeira Drive <i>Amend the second sentence in paragraph 3.47 of the supporting text to read:</i></p> <p>A number of options will need to be considered such as the feasibility <u>including the reopening of the closed staircases between Marine Parade and Madeira Drive and the feasibility of improving lift access to include whether Madeira Lift could be opened all year round and/or the provision of additional lift access, as well as improved wayfinding and reducing the severance caused by the Volks railway whilst improving its visual setting.</u></p>	To clarify the potential to improve access to Madeira Terrace and Madeira Drive.
	New footnote for supporting text to Policy SSA5 paragraph 3.48 page 165	<p>SSA5 Madeira Terrace and Madeira Drive <i>Add new footnote at the end of the last sentence in paragraph 3.48:</i></p> <p>A masterplan including public realm strategy will be developed to support the implementation of this policy[#].</p> <p>[#] <u>The Eastern Seafront Masterplan SPD is due to be adopted in 2022</u></p>	Factual update on progress on the Eastern Seafront Masterplan SPD.
MM42	Policy SSA6, page 167	<p>SSA6 Former Peter Pan leisure site (adjacent Yellow Wave), Madeira Drive <i>Amend the two bullet points under first paragraph of policy to read:</i></p> <ul style="list-style-type: none"> • leisure uses (Use Classes D2E (d) and F2) or art and heritage uses (Use Classes D4 <u>F1(b) and F1(c)</u>) appropriate to the character of the seafront providing the main use of the site; and • ancillary supporting retail uses (Use Classes A1, A3, A4 and A5-E (a), E (b), Public house, wine bar, <u>or drinking establishment (Sui Generis) and hot food takeaway for the sale of hot food where consumption of that food is mostly undertaken off the premises (Sui Generis).</u> 	To ensure consistency with changes to the Use Classes Order, as amended pursuant to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020

Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification
	Supporting text to Policy SSA6, para. 3.52 page 168	<p>Policy SSA6 <i>Amend the first sentence of the supporting text 3.52 as follows:</i></p> <p>Ancillary retail uses will be permitted that support the new attraction and create footfall to the site. Due to the heritage assets (<u>the East Cliff Conservation Area and Grade II* listed Madeira Terraces and Shelter Hall which have been added to Historic England's list of heritage assets at risk</u>) a Heritage Impact Assessment will be required with any application for the site. dDevelopment at beach level should be primarily single storey and should not exceed the height of middle promenade to respect the historic setting and open nature of the area...</p>	Factual update of listing status and to clarify how potential heritage impacts should be identified.
MM43	Policy SSA7, page 169	<p>SSA7 Land Adjacent to American Express Community Stadium, Village Way <i>Amend bullet point under first paragraph of policy to read:</i></p> <ul style="list-style-type: none"> • B1a <u>E(g)</u> (i) (offices), D1 <u>E</u> (e) (health) F1 (a), (health/education) and/or other ancillary uses directly associated with the Stadium and/or Sussex and Brighton Universities. 	To ensure consistency with changes to the Use Classes Order, as amended pursuant to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020
	Supporting text to SSA7, page 170	<p>SSA7 Land Adjacent to American Express Community Stadium, Village Way <i>Amend final sentence in paragraph 3.54 to read:</i></p> <p>The site provides an opportunity to enhance the facilities of the Stadium by providing for example B1a offices or D1 health/ education uses associated with the Stadium or the Universities.</p>	To ensure consistency changes to the Use Classes Order, as amended pursuant to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020

Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification		
	Supporting text to Policy SSA7 paragraph 3.59 page 170	<p>SSA7 Land Adjacent to American Express Community Stadium, Village Way <i>In paragraph 3.59 of supporting text amend first sentence to read:</i></p> <p>“The design and massing of any proposed development will need to consider <u>by way of a Heritage Impact Assessment</u> the visual impact of the Grade II registered historic Stanmer Park and Listed Buildings within the University of Sussex campus (see Policy DM29 The Setting of Heritage Assets).</p>	To clarify how potential heritage impacts should be identified.		
MM44	Policy H1 page 172	<p>Policy H1 Housing Sites and Mixed Use Sites <i>Amend second sentence of first paragraph of policy to read:</i></p> <p>Planning permission will be granted for proposals that accord with the Development Plan and which provide the minimum indicative amounts of development shown in the tables.</p>	To ensure the policy wording is clear and unambiguous.		
	Supporting text to Policy H1, paragraph 3.64, page 172	<p>Policy H1 Housing Sites and Mixed Use Sites <i>Add new sentence to Paragraph 3.64 to read:</i></p> <p>3.64 Only sites which are expected to bring forward 10 or more residential units are allocated in this policy. <u>Approximately 90% of this housing will be on sites of less than one hectare which considerably exceeds the 10% target set in the NPPF Paragraph 69a.</u> It is expected that smaller sites and windfall provision will continue to make a significant contribution towards the city’s planned housing requirements as accounted for in Policy CP1.</p>	To provide a direct reference to the requirement in NPPF 69a.		
	Policy H1, Table 6 page 174	<p>Policy H1 Housing Sites and Mixed Use Sites <i>Table 6 – Residential Site Allocations amend Table 6 to delete the following sites:</i></p> <table><tr><td>Site Name</td><td>Indicative number of Residential</td><td>Permitted additional Uses</td></tr></table>	Site Name	Indicative number of Residential	Permitted additional Uses
Site Name	Indicative number of Residential	Permitted additional Uses			

Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed			Reason for Modification
			Units (Use Class C3)		For 2-16 Coombe Road site, deletion in response to a representation from the landowner confirming the site will not be made available for redevelopment during the plan period.
		Land between Marine Drive and rear of 2-18 The Cliff, Brighton	10 ¹⁴⁷		
		2-16 Coombe Road	33	B1 starter business units/affordable workspace at ground floor.	
		Delete associated footnote 147: Development will mitigate any adverse impacts on designated sites and provide biodiversity net gains in accordance with Policy CP10 and DM37			
	Policy H1, Table 6 page 175	Policy H1 Housing Sites and Mixed Use Sites Table 6 – Residential Site Allocations amend the table to add the following rows to read:			For Fox Way, to reflect an extant planning consent for the site.
		Land at the corner of Fox Way and Foredown Road, Portslade#	10 14		
	Policy H1, Table 6 page 175	Policy H1 Housing Sites and Mixed Use Sites Table 6 – Residential Site Allocations amend the table to add the following rows to read:			In response to consideration of omission sites put forward at Regulation

Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed			Reason for Modification																		
		<table><tr><td>Site Name</td><td>Indicative number of Residential Units (Use Class C3)</td><td>Permitted additional Uses</td></tr><tr><td><u>Land at Preston Road / Campbell Road, Brighton</u></td><td><u>24</u></td><td></td></tr><tr><td><u>154 Old Shoreham Road, Hove</u></td><td><u>30</u></td><td><u>E class uses on ground floor</u></td></tr></table>	Site Name	Indicative number of Residential Units (Use Class C3)	Permitted additional Uses	<u>Land at Preston Road / Campbell Road, Brighton</u>	<u>24</u>		<u>154 Old Shoreham Road, Hove</u>	<u>30</u>	<u>E class uses on ground floor</u>		19 consultation stage which have been assessed to be suitable and available sites for housing development.										
Site Name	Indicative number of Residential Units (Use Class C3)	Permitted additional Uses																					
<u>Land at Preston Road / Campbell Road, Brighton</u>	<u>24</u>																						
<u>154 Old Shoreham Road, Hove</u>	<u>30</u>	<u>E class uses on ground floor</u>																					
	Policy H1, Table 6	<p><i>Policy H1 Housing Sites and Mixed Use Sites</i></p> <p><i>Table 6 – Residential Site Allocations amend Table 6 to delete:</i></p> <table><tr><td>Site Name</td><td>Indicative number of Residential Units (Use Class C3)</td><td>Permitted additional Uses</td></tr><tr><td>87 Preston Road, Brighton, BN1 4QG</td><td>25</td><td></td></tr><tr><td>George Cooper House, 20-22 Oxford Street, Brighton</td><td>20</td><td>Retail at ground floor level.</td></tr><tr><td>Whitehawk Clinic, Whitehawk Road, Brighton#</td><td>38</td><td></td></tr><tr><td>Buckley Close garages, Hangleton #</td><td>12</td><td></td></tr><tr><td>189 Kingsway, Hove #</td><td>60</td><td></td></tr></table>			Site Name	Indicative number of Residential Units (Use Class C3)	Permitted additional Uses	87 Preston Road, Brighton, BN1 4QG	25		George Cooper House, 20-22 Oxford Street, Brighton	20	Retail at ground floor level.	Whitehawk Clinic, Whitehawk Road, Brighton#	38		Buckley Close garages, Hangleton #	12		189 Kingsway, Hove #	60		Deletions to reflect the substantial completion of development on these sites.
Site Name	Indicative number of Residential Units (Use Class C3)	Permitted additional Uses																					
87 Preston Road, Brighton, BN1 4QG	25																						
George Cooper House, 20-22 Oxford Street, Brighton	20	Retail at ground floor level.																					
Whitehawk Clinic, Whitehawk Road, Brighton#	38																						
Buckley Close garages, Hangleton #	12																						
189 Kingsway, Hove #	60																						

Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed				Reason for Modification									
		Kings House, Grand Avenue, Hove #	169												
	Policy H1, Table 6 page 175	Policy H1 Housing Sites and Mixed Use Sites <i>Table 6 – Residential Site Allocations amend the Total row to read:</i> <table><tr><td>TOTAL</td><td><u>1,051- 752</u></td><td></td></tr></table>				TOTAL	<u>1,051- 752</u>		Factual update of housing total to reflect changes to site allocations detailed above.						
TOTAL	<u>1,051- 752</u>														
	Policy H1, Table 6 pages 173 - 175	Policy H1 Housing Sites and Mixed Use Sites <i>Table 6 – Residential Site Allocations amend the following rows in Table 6 to read:</i> <table><tr><th>Site Name</th><th>Indicative number of Residential Units (Use Class C3)</th><th>Permitted additional Uses</th></tr><tr><td>Land between Manchester Street/Charles Street, Brighton, BN2 1TF#</td><td>12</td><td>B1-E class employment floorspace or D2 entertainment <u>and leisure</u> uses.</td></tr><tr><td>Saunders Glassworks, Sussex Place, Brighton, BN2 9QN#</td><td>49</td><td><u>E class uses</u></td></tr></table>				Site Name	Indicative number of Residential Units (Use Class C3)	Permitted additional Uses	Land between Manchester Street/Charles Street, Brighton, BN2 1TF#	12	B1-E class employment floorspace or D2 entertainment <u>and leisure</u> uses.	Saunders Glassworks, Sussex Place, Brighton, BN2 9QN#	49	<u>E class uses</u>	To ensure consistency changes to the Use Classes Order, as amended pursuant to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 and in response to a representation from the landowner of the Saunders Glassworks site
Site Name	Indicative number of Residential Units (Use Class C3)	Permitted additional Uses													
Land between Manchester Street/Charles Street, Brighton, BN2 1TF#	12	B1-E class employment floorspace or D2 entertainment <u>and leisure</u> uses.													
Saunders Glassworks, Sussex Place, Brighton, BN2 9QN#	49	<u>E class uses</u>													
	Policy H1, page 176	Policy H1 Housing Sites and Mixed Use Sites <i>Amend the following rows in Table 7 Mixed Use Housing Site Allocations to read:</i>				For consistency with the heading in Table 6, to ensure consistency with changes to the									

Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed			Reason for Modification
		Site Name	Indicative number of Residential Units (Use Class C3)	Minimum Requirements for Other Uses	Use Classes Order, as amended pursuant to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 and to make the allocation at 71-76 Church Street justified and effective.
		71 - 76 Church Street, Brighton	50 10	B1 E(g) Employment floorspace in the northern part of the site on the ground floor which could include small scale workshop type units.	
		Post Office site, 62 North Road, Brighton#	110	3000sqm B1 E(g) employment floorspace.	
		27-31 Church Street (corner with Portland Street)#Ω	10	630sqm E(g) employment floorspace B1 Offices.	
		Former Dairy Crest Site, 35-39 The Drove way, Hove, #	14	500sqm B E use class employment uses, ancillary retail.	
		Kingsway/Basin Road North (Site AB4 in Shoreham Harbour Joint Area Action Plan (JAAP) Policy CA2)#	90	Use classes B1 E(g) and B2 at Basin Road North level, use classes E A2, B1 and ancillary A1 at Kingsway level, and use class C3 on upper storeys.	

Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed			Reason for Modification
		<div>Prestwich House, North Street, Portslade (Site SP1 in JAAP Policy CA3)</div> <div>Regency House, North Street, Portslade (Site SP4 in JAAP Policy CA3)</div> <div>Former Flexer Sacks, Wellington Road, Portslade (Site SP5 in JAAP Policy CA3)</div> <div>Church Road/ Wellington Road/ St Peter's Road (Site SP6 in JAAP Policy CA3)</div> <div>Station Road site, Portslade (Site SP7 in JAAP Policy CA3)</div>	<div>15</div> <div>45</div> <div>45</div> <div>25</div> <div>15</div>	<div>Use class B1 <u>E(g)</u> on lower storeys.</div> <div>Use class B1 <u>E(g)</u> on lower storeys</div> <div>Use class B1 <u>E(g)</u> on lower storeys and use class C3 on upper storeys. Associated leisure and assembly (use class D) uses may be permitted provided they are demonstrated to be compatible with residential and employment uses in the vicinity.</div> <div>The southern portion of the site is allocated for new employment development (use classes B1 <u>E(g)</u>, B2 and B3).</div> <div>Use classes A1, A2, A3 and B1 <u>E</u> fronting Station Road.</div>	
	Policy H1, Table 7 page 176	Policy H1 Housing Sites and Mixed Use Sites <i>Table 7 – Residential Site Allocations amend the Total row to read:</i>			Factual update of housing total to reflect changes to site

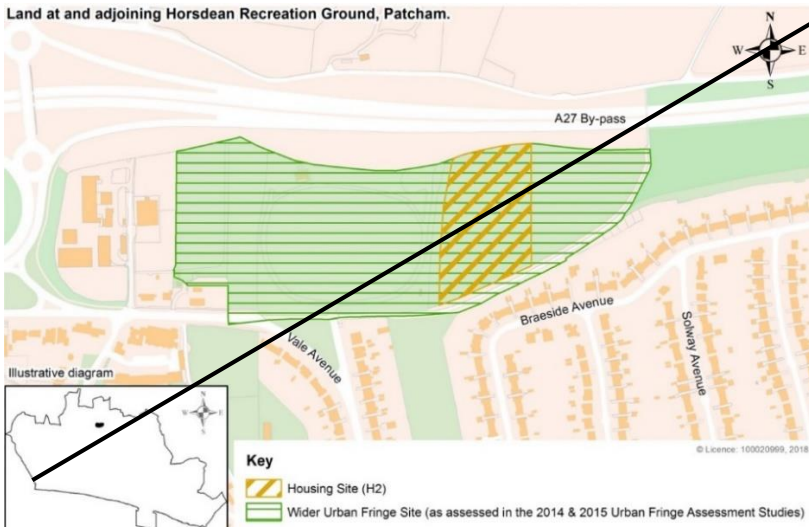
Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed						Reason for Modification
		TOTAL		519479				allocations detailed above.
MM45	Policy H2 – Table 8 Urban Fringe Allocations, page 180	Policy H2 Housing Sites – Urban Fringe <i>Table 8 Urban Fringe Allocations, amend heading in fifth column of table as shown:</i>						For consistency with the H2 policy wording.
		Site Name	UFA Reference	Total Site Area (Hectares)	Area of Development Potential (Hectares)	Potential Indicative Number of Dwelling Units ¹	Indicative Percentage of Family Sized Housing (3+ bedroom)	
	Policy H2 – Table 8 Urban Fringe Allocations, page 180	Policy H2 Housing Sites – Urban Fringe <i>Table 8 Urban Fringe Allocations amend table to delete ‘Land at and Adjoining Horsdean Recreation Ground, Patcham’ and associated detail:</i>						Deletion of site in response to further evidence relating to the potential impact of development on the Patcham Court Field Local Wildlife Site (Urban Fringe Assessment 2021 Update). DM25
		Site Name	UFA Reference	Total Site Area (Hectares)	Area of Development Potential (Hectares)	Potential Indicative Number of Dwelling Units ¹	Indicative Percentage of Family Sized Housing (3+ bedroom)	

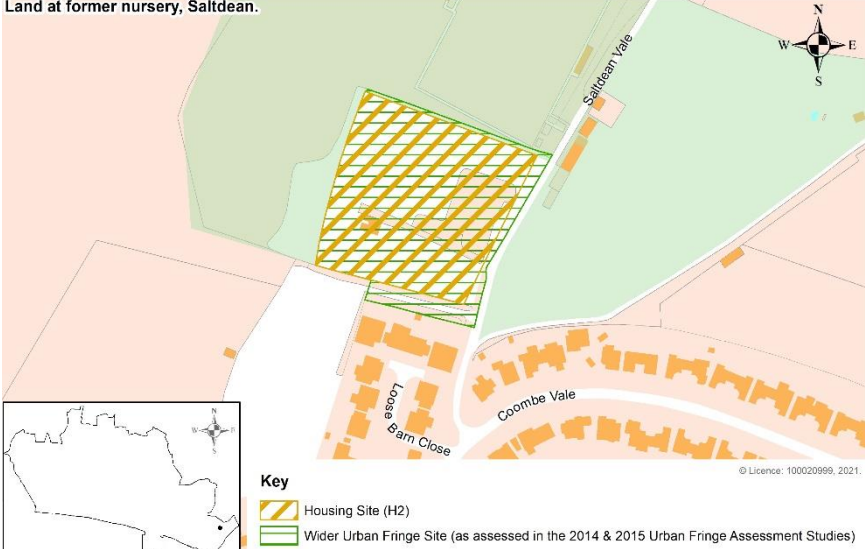
Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed							Reason for Modification
		Land at and adjoining Horsdean Recreation Ground, Patcham	Site 16 (2014 UFA); Study Area L4 (2015 UFA);	6.32	1.17	25	50%	<ul style="list-style-type: none"> ecology heritage open space landscape Groundwater Source Protection Zone archaeology ground water flooding¹⁴⁶ 	
	Policy H2 – Table 8 Urban Fringe Allocations, page 182	Policy H2 Housing Sites – Urban Fringe <i>Table 8 Urban Fringe Allocations amend the following row to read:</i>							Total Site Area amended to reflect proposed change to site allocation boundary as shown on the Policies Map. Area of development Potential and Potential Number of Dwelling Units amended to reflect recommendations of the Urban Fringe Assessment 2021 Update.
		Site Name	UFA Reference	Total Site Area (Hectares)	Area of Development Potential (Hectares)	Potential Indicative Number of Dwelling Units¹	Indicative Percentage of Family Sized Housing (3+ bedroom)	Key Site Considerations	
		Land at former nursery, Saltdean #	Site 46a (2014 UFA); Study Area E14 (2015 UFA);	0.96 0.83	0.96 0.75	24 18	50%	<ul style="list-style-type: none"> surface and ground water flooding¹³⁹ landscape Groundwater Source Protection Zone wastewater infrastructure 	

Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed							Reason for Modification
	Supporting text to Policy H2 Paragraph 3.69 page 183	Policy H2 Housing Sites – Urban Fringe <i>Amend final sentence of supporting text at paragraph 3.69 to read:</i> In addition, the provision of serviced plots for self-build and custom build housing and proposals for community-led housing will be strongly encouraged <u>all development proposals will be expected to include a proportion of serviced plots for self and/ custom build dwellings subject to viability considerations</u> (see also Policy DM1 Housing Quality, Choice and Mix).							To provide greater clarity and ensure supporting text is consistent with policy criterion i).
	Supporting text to Policy H2 Paragraph 3.73 page 184	Policy H2 Housing Sites – Urban Fringe <i>Amend part of final sentence in the supporting text at paragraph 3.73 So read:</i> Ecological Assessment including Protected Species Survey <u>Ecological Impact Assessment</u>							To reflect good practice and provide clarity for applicants.
	Supporting text to Policy H2 Paragraph 3.73 page 184	Policy H2 Housing Sites – Urban Fringe <i>Add new footnote after the words ‘Heritage Statement’ in the final sentence in the supporting text at paragraph 3.73:</i> <i>New footnote to read: In accordance with Historic England Advice Note 12: Statements of Heritage Significance.</i>							To provide clarity and guidance on Heritage Statement requirements.
	Supporting Text to Policy H2 Paragraph 3.76 page 185	Policy H2 Housing Sites – Urban Fringe <i>Amend second sentence of supporting text at paragraph 3.76 to read:</i>							To provide greater clarity and to emphasise the need for detailed ecological

Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed			Reason for Modification						
		All sites where potentially significant impacts on ecology were identified in the 2014 Urban Fringe Assessment have been subject to desktop detailed ecological assessments in the 2015 Urban Fringe Assessment, which included a Desktop Study and Phase 1 Habitat Survey. However, detailed surveys (including species surveys) will be required to support development proposals, and these must be used to inform the development of specific mitigation requirements.			surveys to inform mitigation of development.						
MM46	Policy H3 page 186	Policy H3 Purpose Built Student Accommodation <i>Amend Table 9 to read</i> <table><tr><th>Site Name</th><th colspan="2">Indicative number of bedspaces</th></tr><tr><td>45 & 47 39-47 Hollingdean Road, Brighton</td><td colspan="2">40 99</td></tr></table>			Site Name	Indicative number of bedspaces		45 & 47 39-47 Hollingdean Road, Brighton	40 99		To reflect an extant planning permission (BH2019/03700)
	Site Name	Indicative number of bedspaces									
	45 & 47 39-47 Hollingdean Road, Brighton	40 99									
Policy H3, Table 9 page 186	Policy H3 Purpose Built Student Accommodation <i>Amend policy at Table 9 Purpose Built Student Accommodation Sites - delete row:</i> <table><tr><th>Site Name</th><th>Indicative number of bedspaces</th><th>Other Required Uses</th></tr><tr><td>118-132 London Road, Brighton</td><td>232</td><td>Ground floor uses must comply with Policy DM12</td></tr></table>			Site Name	Indicative number of bedspaces	Other Required Uses	118-132 London Road, Brighton	232	Ground floor uses must comply with Policy DM12	Development of this site for PBSA is substantially complete.	
Site Name	Indicative number of bedspaces	Other Required Uses									
118-132 London Road, Brighton	232	Ground floor uses must comply with Policy DM12									
Supporting text to Policy H3, para. 3.81 page 186	Policy H3 Purpose Built Student Accommodation <i>Add new paragraph after paragraph 3.81 to read:</i> “ <u>Where a site is located in an area with underground chalk aquifers identified as Groundwater Source Protection Zones by the Environment Agency, development will need to ensure that groundwater resources are protected from pollution and safeguard water supplies, in line with the requirements of Policy DM42.</u> ”			To ensure consistency with other site allocations located within Groundwater Source Protection Zones.							

Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification
MM47	Policy E1, page 187	<p><i>Policy E1 Opportunity site for business and warehouse uses</i> <i>Amend bullet point after first paragraph of policy to read:</i></p> <ul style="list-style-type: none"> • Business and warehouse premises (Use Classes B1 <u>E(g)</u> and B8). 	To ensure consistency changes to the Use Classes Order, as amended pursuant to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020
	Supporting text to Policy E1, paragraph 3.87, page 188	<p><i>E1 Opportunity site for business and warehouse uses</i> <i>Amend last sentence of supporting text at paragraph 3.87 to read:</i></p> <p>Regard should be given to the need to conserve and enhance biodiversity in accordance with CP10 Biodiversity and DM37 Green Infrastructure and Nature Conservation. In accordance with Policy DM37, development proposals must demonstrate that any adverse effects would not undermine the objectives of the designation, integrity of the local wildlife site and that impacts can be mitigated and biodiversity net gains achieved.</p>	To ensure consistency of wording with Main Modifications to DM37 and to better accord with the NPPF paragraph 180.
	Supporting text to Policy E1, paragraph 3.87 page 188	<p><i>Policy E1 Opportunity Site for business and warehouse uses</i> <i>Add new sentence to the end of paragraph 3.87 to read:</i></p> <p><u>The design and materials used in development will be expected to reflect the setting and natural beauty of the National Park and should reflect the South Downs Integrated Landscape Character Assessment (SDILCA), specifically the Landscape Management and Development Considerations described in Appendix A, Landscape Type A: Open Downland and A2: Adur to Ouse Open Downs area[#]</u></p> <p><i>Add new footnote:</i></p>	To ensure consistency with wording used for other site allocations where the setting of the National Park has been identified as a potential constraint.

Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification
		# South Downs Landscape Character Assessment (LCA) 2020	
MM48	Appendix 2, page 198	<p>Appendix 2 Parking Standards Add wording before table in Appendix 2:</p> <p><u>Where the parking standards set out below refer to a revoked use class the relevant standard should be applied as if they refer to the corresponding use in the new Use Class Order which came into effect in September 2020. For example, use class A1 has been revoked and is replaced by use class E(a).</u></p>	To ensure consistency given changes to Use Class Order, as amended pursuant to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.
MM49	Appendix 4 - Policy H2 Urban Fringe Housing Site Maps, page 211	<p>Appendix 4 Policy H2 Urban Fringe Housing Site Maps Delete indicative map titled 'Land at and adjoining Horsdean Recreation Ground':</p> 	As consequence of proposed deletion of site allocation in response to further evidence relating to site developability (Urban Fringe Assessment 2021 Update).

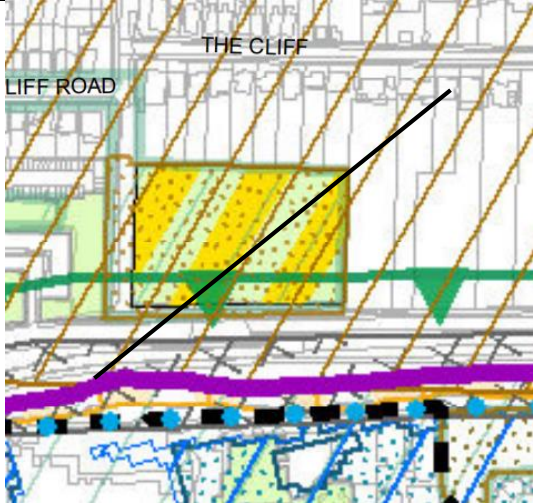
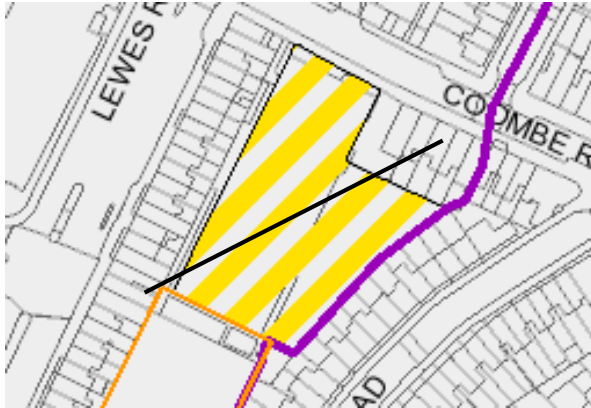
Main Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification
	Appendix 4 - Policy H2 Urban Fringe Housing Site Maps, page 215	<p>Appendix 4 Policy H2 Urban Fringe Housing Site Maps</p> <p><i>Amend the site boundary of the indicative map titled ‘Land at former nursery, Saltdean’ (see also proposed changes to the Policy Map). New map is shown below:</i></p>  <p>Land at former nursery, Saltdean.</p> <p>Key</p> <ul style="list-style-type: none"> Housing Site (H2) Wider Urban Fringe Site (as assessed in the 2014 & 2015 Urban Fringe Assessment Studies) <p>© Licence: 100020999, 2021.</p>	Amendment to boundary of Policy H2 Site 46a to remove land in the ownership of a neighbouring landowner.

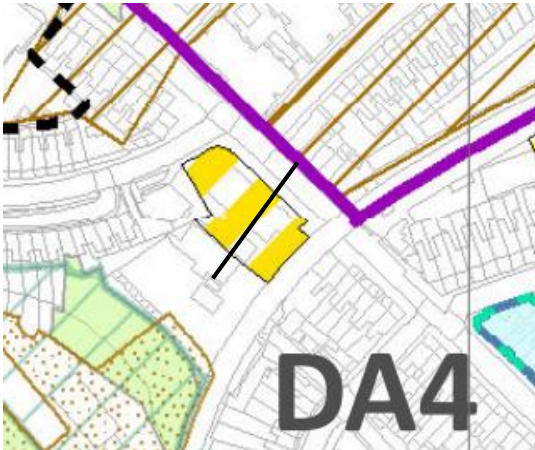

Appendix 2 Schedules of Additional Modifications

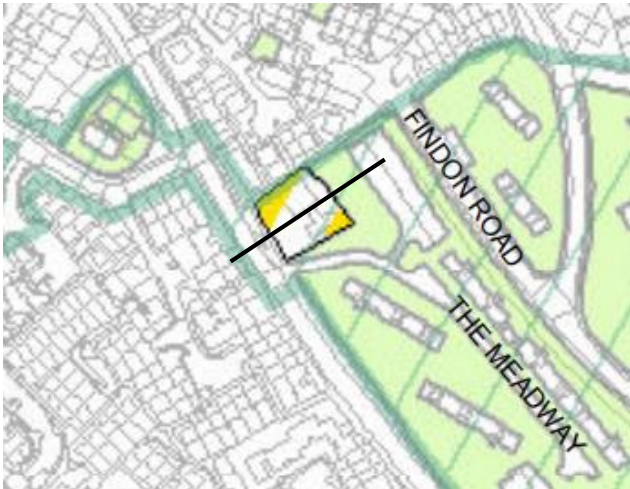
BHCC48 Schedule of Proposed Modifications to the Proposed Submission CPP2 Changes to the Policy Map

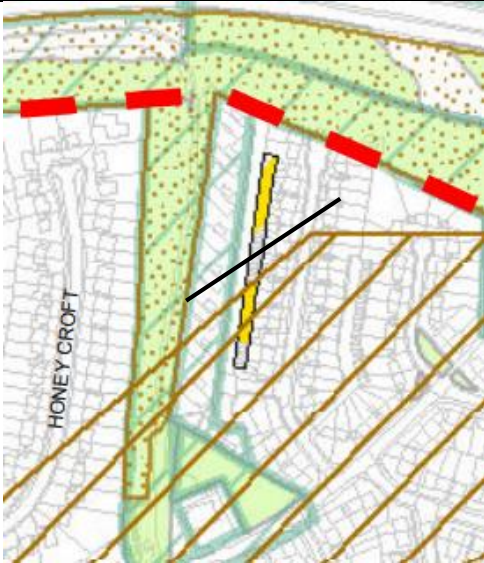
1. The Proposed Submission City Plan Part 2 was submitted to the Secretary of State on 13 May 2020. Public hearings were held in November 2021.
2. As part of the examination process a number of proposed Main Modifications (MMs) have been identified. A Main Modification is an amendment which is considered necessary to make the Plan sound or legally compliant, addressing issues raised during the examination process and those set out in Inspector Note 09
3. Some of the MMs will have an impact on the way the CPP2 will be shown on the Policies Map as set out in SD03a - proposed changes to the policies map - West - April 2020, SD03b - proposed changes to the policies map - Central - April 2020 and SD03c - proposed changes to the policies map - East - April 2020
4. This schedule identifies the map changes that are required to as a result of the Main Modifications:
 - diagonal line shows strike through of site allocation as shown on the Proposed Submission CPP2 Changes to the Policy Map
 - proposed amendments to site boundaries shown as dashed line overlain on the existing site boundary for ease of reading against the Proposed Changes to the Policy Map site boundary line


Proposed Policy Map Change	Policy Reference	Modification Proposed	Reason for Modification
Map1	Policy H1	<p><i>Policy H1 Housing Sites and Mixed Use Sites</i></p> <p><i>Delete the following housing site allocations from the H1 layer as shown on the proposed changes to the policy map:</i></p> <p>Land between Marine Drive and rear of 2-18 The Cliff, Brighton</p>	To align with proposed changes to Policy H1

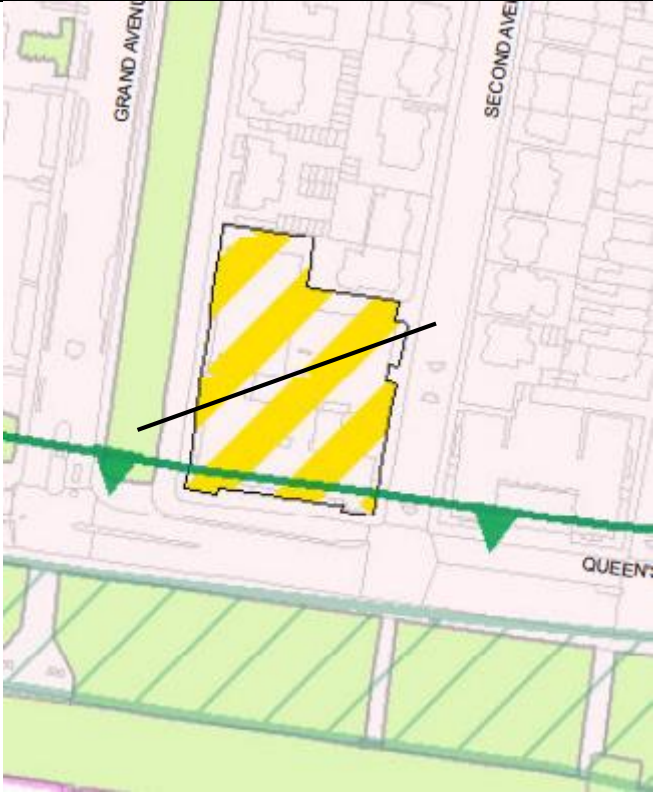
			
Map2	Policy H1	<p>Policy H1 Housing Sites and Mixed Use Sites</p> <p><i>Delete the following housing site allocation from the H1 layer as shown on the proposed changes to the policy map:</i></p> <p>2-16 Coombe Road</p> 	

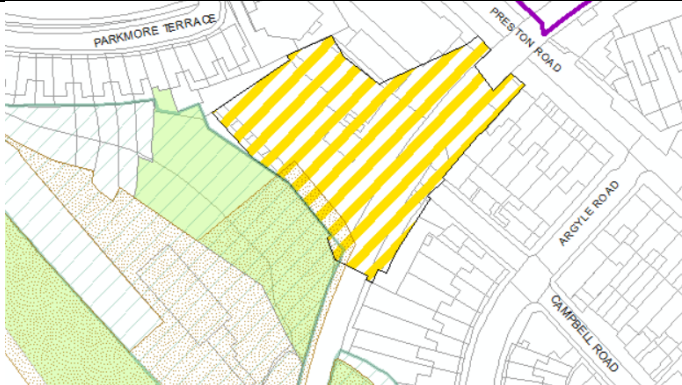

Map3	Policy H1	<p>Policy H1 Housing Sites and Mixed Use Sites Delete the following housing site allocation from the H1 layer as shown on the proposed changes to the policy map: 87 Preston Road, Brighton, BN1 4QG</p> 	
Map4	Policy H1	<p>Policy H1 Housing Sites and Mixed Use Sites Delete the following housing site allocation from the H1 layer as shown on the proposed changes to the policy map: George Cooper House, 20-22 Oxford Street, Brighton</p> 	To align with proposed changes to Policy H1

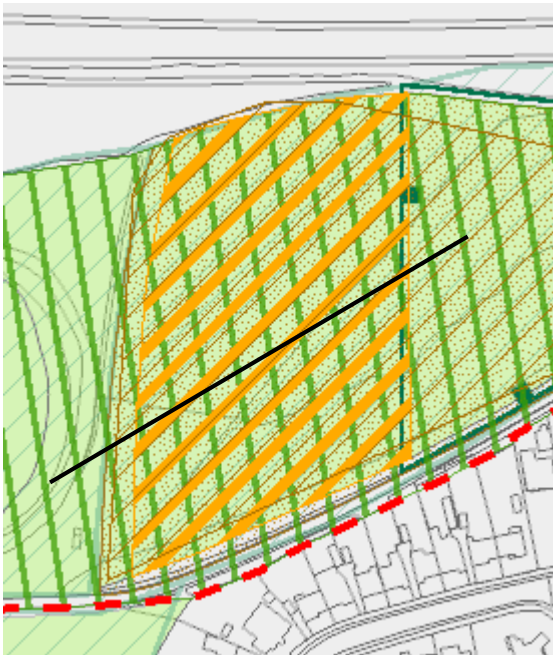
Map5	Policy H1	<p>Policy H1 Housing Sites and Mixed Use Sites Delete the following housing site allocation from the H1 layer as shown on the proposed changes to the policy map</p> <p>Whitehawk Clinic, Whitehawk Road, Brighton#</p> 	To align with proposed changes to Policy H1
Map6	Policy H1	<p>Policy H1 Housing Sites and Mixed Use Sites Delete the following housing site allocation from the H1 layer as shown on the proposed changes to the policy map</p> <p>Buckley Close garages, Hangleton</p>	To align with proposed changes to Policy H1

			
Map7	Policy H1	<p>Policy H1 Housing Sites and Mixed Use Sites</p> <p><i>Delete the following housing site allocation from the H1 layer as shown on the proposed changes to the policy map:</i></p> <p>189 Kingsway, Hove #</p>	<p>To align with proposed changes to Policy H1</p>



			
Map8	Policy H1	<p>Policy H1 Housing Sites and Mixed Use Sites</p> <p><i>Delete the following housing site allocation from the H1 layer as shown on the proposed changes to the policy map:</i></p> <p>Kings House, Grand Avenue, Hove #</p>	<p>To align with proposed changes to Policy H1</p>

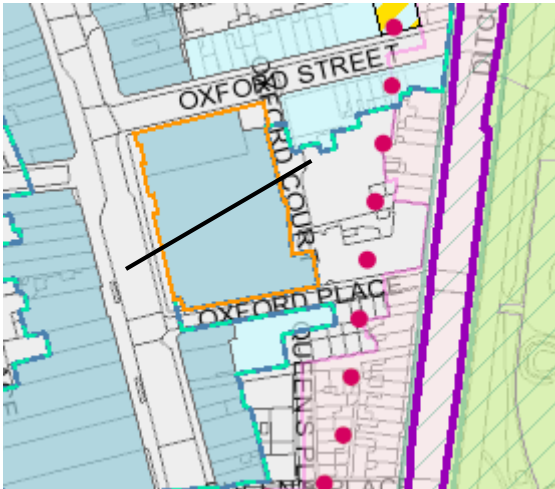
			
Map9	Policy H1	<p>Policy H1 Housing Sites and Mixed Use Sites</p> <p><i>Add the following site allocation to the H1 layer as shown on the proposed changes to the policy map:</i></p> <p>Land at Preston Road / Campbell Road, Brighton</p>	<p>To align with proposed changes to Policy H1</p>

			
Map10	Policy H1	<p><i>Policy H1 Housing Sites and Mixed Use Sites</i> <i>Add the following site allocation to the H1 layer as shown on the proposed changes to the policy map:</i></p> <p>154 Old Shoreham Road, Hove (Furniture Village site and car park, corner of Old Shoreham Road and Sackville Road)</p> 	To align with proposed changes to Policy H1

Map11	Policy H2	<p>Policy H2 Urban Fringe Housing</p> <p><i>Delete the following housing site allocation from the H2 layer as shown on the proposed changes to the policy map:</i></p> <p>Land at and Adjoining Horsdean Recreation Ground, Patcham</p> 	To align with proposed changes to Policy H2
Map12	H2	<p>Policy H2 Urban Fringe Housing</p> <p><i>Amend the southern and eastern boundaries of the following housing site allocation from the H2 layer as shown on the proposed changes to the policy map</i></p> <p>Land at former nursery, Saltdean</p> <p>Site allocation before boundary amendment</p>	To align with proposed changes to Policy H2

		 <p>Site allocation following boundary amendment</p> 	
Map13	Policy H3	<p>Policy H3 – Purpose Built Student Accommodation</p> <p><i>Amend the site boundary of the site in Hollingdean Road as follows:</i></p> <p><i>Site allocation before boundary amendment</i></p>	To reflect an extant planning permission (BH2019/03700)

		 <p><i>Site allocation after boundary amendment</i></p> 	
Map14	Policy H3	<p>Policy H3 Purposed Built Student Accommodation</p> <p><i>Delete the following purpose built student accommodation site allocation from the H3 layer as shown on the proposed changes to the policy map:</i></p> <p>118–132 London Road, Brighton</p>	To align with proposed change to Policy H3

			
Map15	Proposed Changes to the Policy Map legend	<p><i>Proposed Changes to the Policy Map legend</i></p> <p>Amend the legend to read:</p> <p>Waste & Minerals Sites – SP1 & SP2 (WMSP)</p> <p>Amend to “<u>Waste site allocations and areas of opportunity</u>”</p>	For clarification
Map16	ANA layer on Policy Map	<p><i>Archaeological Notification Layer update</i></p> <p>Prior to adoption to update the ANA to reflect the most recent layer as provided by the County Archaeologist.</p>	Factual Update

BHCC49 Schedule of Proposed Additional Modifications, February 2022

1. The Proposed Submission City Plan Part 2 was submitted to the Secretary of State on 13 May 2020. Public hearings were held in November 2021.
2. As part of the examination process a number of proposed Additional (Minor) Modifications have been identified. The Planning and Compulsory Purchase Act 2004 (as amended) allows the Local Planning Authority to make additional (minor) modifications to the plan on adoption, but only if they do not materially affect the Plan's policies. These additional modifications are not subject to the formal examination and generally address minor issues of clarity.
3. **Table 1** identifies the proposed Additional Modifications (AM) the Authority proposes at this stage. These Additional Modifications will only be considered by the Authority and not by the Planning Inspectorate as they do not relate to the soundness of the plan. To view the Main Modifications please refer to the Schedule of Proposed Main Modifications BHCC44.
4. **Table 2** identifies the proposed additional modifications the Authority proposes at this stage in relation to the Implementation and Monitoring Plan (SD04) identified as IMP#. These Additional Modifications will only be considered by the Authority and not by the Planning Inspectorate as they do not relate to the soundness of the plan.
5. The proposed additional modifications are generally expressed in the form of strikethrough for deletions of text and underlined for additions of text and are set out in the same order as the April 2020 Proposed Submission City Plan Part 2.

Table 1 Schedule of Additional Modifications

Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification
AM01	Introduction paragraph 1.8 page 8	<i>Relationship with other DPDs</i> <i>Move the following text from paragraph 1.9 to paragraph 1.8 and amend as follows:</i> "Shoreham Harbour Joint Area Action Plan (JAAP) ² – provides a comprehensive, deliverable plan for the regeneration future revitalization of Shoreham Harbour. The JAAP was prepared jointly with Adur District Council and West Sussex County Council."	Factual update to reflect adoption of JAAP.
AM02	Introduction paragraph 1.9 page 8	Add the following text to paragraph 1.9 " <u>Review of the Waste and Minerals Local Plan</u> – a focussed review of certain policies in the Waste & Minerals Local Plan".	Factual updates.

Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification								
		<p>And amend the following text at paragraph 1.9 and delete associated footnote:</p> <p>Community Infrastructure Levy (CIL) – once adopted CIL came into effect on the 5 October 2020. CIL allows local authorities to raise funds from development for the provision of infrastructure in and around their areas.</p> <p>1. Following an examination in public and consultation on proposed modifications CIL is expected to be adopted in June and introduced in October 2020.</p>									
AM03	Introduction, paragraph 1.10 page 9	<p><i>Duty to Cooperate</i> <i>Amend the last sentence at the end of the paragraph to read:</i></p> <p>A duty to Cooperate Update Paper is published alongside the Proposed Submission City Plan Part 2 and will include an updated Statement of Common Ground prepared by the West Sussex and Greater Brighton Local Planning Authorities.</p>	Factual update.								
AM04	Table 1 page 10	<p><i>Table 1 Timetable for the Preparation of City Plan Part Two</i> <i>Delete table and associated footnote:</i></p> <p>Table 1 Timetable for the Preparation of City Plan Part Two</p> <table><tr><th>City Plan Part Two stage of plan preparation</th><th>Date</th></tr><tr><td>Scoping Document (Regulation 18)</td><td>June 2016</td></tr><tr><td>Draft Plan and SA (Regulation 18)</td><td>Summer 2018</td></tr><tr><td>Publication of Proposed Submission City Plan Part 2</td><td>Approved by Council 23 April 2020</td></tr></table>	City Plan Part Two stage of plan preparation	Date	Scoping Document (Regulation 18)	June 2016	Draft Plan and SA (Regulation 18)	Summer 2018	Publication of Proposed Submission City Plan Part 2	Approved by Council 23 April 2020	Editorial – not required for final version of plan.
City Plan Part Two stage of plan preparation	Date										
Scoping Document (Regulation 18)	June 2016										
Draft Plan and SA (Regulation 18)	Summer 2018										
Publication of Proposed Submission City Plan Part 2	Approved by Council 23 April 2020										

Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed		Reason for Modification
		<div>Regulation 19 Consultation</div> <div>Submission to the Secretary of State</div> <div>Examination in Public</div> <div>Adoption of City Plan Part Two</div>	<div>Dates to be confirmed after Coronavirus (Covid-19) restrictions are lifted.</div> <div>The timetable for next stages of the City Plan Part 2 will be published on the council's City Plan Part 2 webpage once a start date for the consultation has been set¹.</div>	
AM05	Introduction paragraph 1.14 -1.18, page 11	<p><i>How to Comment on the Proposed Submission City Plan Part Two</i> Delete paragraphs 1.14-1.18 and associated footnote as follows:</p> <p>How to Comment on the Proposed Submission City Plan Part Two</p> <p>1.14 The public consultation is delayed due to the Coronavirus (Covid-19) restrictions. The timetable for next stages of the City Plan Part 2 will be published on the council's City Plan Part Two webpage once a start date for the consultation has been set. Paragraphs 1.15 — 1.17 apply once the consultation has commenced.</p> <p>1.15 The City Council would like your views on the Proposed Submission City Plan Part Two and whether you think it meets the government's tests of soundness and legally compliant 5 . You do not have to comment on everything in the Proposed Submission City Plan Part Two. We want to hear your views on those aspects that are of most interest to you.</p>		Editorial - no longer required as consultation has occurred.

Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification
		<p>1.16 We recommend you make your comments using the council's online consultation portal: http://consult.brighton-hove.gov.uk/portal. This will help us handle your comments quickly and efficiently.</p> <p>1.17 The Proposed Submission City Plan Part Two and supporting documents including the proposed changes to the Policies Map and the Sustainability Appraisal (SA) are available on the Council's website (https://www.brightonhove.gov.uk/content/planning/planning-policy/city-plan-part-two-proposedsubmission-stage-2020) and once Coronavirus (Covid-19) restrictions are lifted, the council will make them available to be viewed at the customer service centres at Hove Town Hall and Bartholomew House Brighton and the main city Libraries (Jubilee, Hove and Portslade) during normal opening hours. The Proposed Submission CPP2 including the policies map and non-technical SA summary will be available to view at all other libraries during normal opening hours once Coronavirus (Covid-19) restrictions are lifted. Word versions of the Response Form are available on request to planningpolicy@brighton-hove.gov.uk</p> <p>1.18 The consultation period for the Proposed Submission City Plan Part Two will be set out in a Statement of Representations Procedure published on the council's City Plan Part Two webpage once a start date has been set. Council's Consultation Portal: http://consult.brighton-hove.gov.uk/portal Email: planningpolicy@brighton-hove.gov.uk (please respond using the Response Form) Post: Proposed Submission CPP2, Policy Projects and Heritage Team, Brighton & Hove City Council, First Floor Hove Town Hall, Norton Road, BN3 3BQ</p>	
AM06	footnote 11 Page 15	<p>Policy DM1 Housing Quality, Choice and Mix Amend footnote 11 to read: National Planning Policy Framework (NPPF) (2019) <u>(2021)</u> paragraph 61-62</p>	Factual update to paragraph number following updated NPPF 2021
AM07	Policy DM4 page 22	<p>DM4 Housing and Accommodation for Older Persons <i>Add the following numbering to the second paragraph of policy to read:</i></p>	For clarity to avoid confusion between

Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification
		<i>'1. Development proposals....'</i>	the two sets of policy criteria.
AM08	Policy DM4 page 22	DM4 Housing and Accommodation for Older Persons <i>Add the following numbering to the fourth paragraph of policy to read:</i> <i>'2. Proposals that....'</i>	For clarity to avoid confusion between the two sets of policy criteria.
AM09	Policy DM5 page 27	DM5 Supported Accommodation (Specialist and Vulnerable Needs) <i>Add the following numbering to the second paragraph of policy to read:</i> <i>'1. Proposals for development'</i>	For clarity to avoid confusion between the two sets of policy criteria.
AM10	Policy DM5 page 27	DM5 Supported Accommodation (Specialist and Vulnerable Needs) <i>Add the following numbering to the third paragraph of policy to read:</i> <i>'2. Proposals that....'</i>	For clarity to avoid confusion between the two sets of policy criteria.
AM11	Policy DM6 Page 30, footnote 30	Policy DM6 Build to Rent Housing Amend footnote 30 to read: MHCLG National Planning Policy Framework, February 2019 <u>2021</u>	Factual update to paragraph number following updated NPPF 2021
AM12	Supporting text to Policy DM8, paragraph 2.72 page 37	DM8 Purpose Built Student Accommodation <i>Amend the first sentence of the supporting text at paragraph 2.72 to read:</i> "However, the number of permitted PBSA bedspaces, currently assessed to be 12,699 , remains below the number of students in the city requiring accommodation, particularly for students at the University of Brighton." <i>Delete associated footnote 36:</i>	This figure is out-of-date as several large PBSA developments are currently being delivered. The number of bedspaces is changing and any

Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification
		36 3,146 bedspaces managed by University of Brighton, 8,167 managed by University of Sussex, and 1,386 privately managed.	figure in the Plan would rapidly become out-of-date. Stating it remains below the number of students will remain factually correct.
AM13	Supporting text to Policy DM8, paragraph 2.73	DM8 Purpose Built Student Accommodation <i>Amend the first sentence of the supporting text paragraph 2.73 to read:</i> “The council welcomes the development of new PBSA on appropriate sites. In addition to setting out criteria to guide the suitable location of PBSA, City Plan Part One Policy CP21 allocated five sites for new development, of which Pelham Street remains undeveloped and without an extant permission.”	Factual update.
AM14	Footnote 43 Page 56	Policy DM14 Commercial and Leisure Uses at Brighton Marina Amend footnote to read: National Planning Policy Framework (NPPF) (2019) (2021) paragraphs 89-90-90-91	Update to paragraph number following updated NPPF 2021
AM15	Supporting text to Policy DM16 Paras 2.137 and 2.138	DM16 Street Markets <i>Amend supporting text at the first sentence of paragraph 2.137 and the first sentence of paragraph 2.138 to read:</i> Street markets <u>and stalls</u> are also important for the establishment of new entrepreneurial business by Brighton & Hove residents.	For clarity

Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification
		The council will use conditions and/or obligations to ensure that the operation of markets <u>and stalls</u> do not have harmful impacts, and will require detailed layout plans as part of an application to allow consideration as to whether these matters have been properly addressed.	
AM16	Policy DM22, Footnote 60 Page 82	DM25 Communications Infrastructure Amend footnote 60 to read: National Planning Policy Framework (NPPF), (<u>2021</u>) paragraph 116 <u>-118</u> .	Factual update to paragraph number following updated NPPF 2021
AM17	Policy DM33, para 2.250 page 100	Policy DM33 Safe, Sustainable and Active Travel <i>Amend paragraph 2.250 to read:</i> Brighton & Hove is already one of the country's least car-dependent cities outside London, with 38.2% of households not owning a car. A number of high-quality improvements to the public realm have been implemented in recent years. These have taken different forms, for example the award-winning shared space scheme on New Road, and the addition of wayfinding boards and fingerposts throughout the city centre, and with further improvements in the pipeline, notably the redesign of Valley Gardens.	Factual update
AM18	Policy DM37 page 111	Policy DM37 Green Infrastructure and Nature Conservation <i>Add new section heading at start of section on protected sites to read:</i> <u>Designated Sites</u>	For clarity
AM19	Supporting text to Policy DM37 paragraph 2.275 page 113	Policy DM37 Green Infrastructure and Nature Conservation <i>Amend the third sentence in paragraph 2.275 to read:</i> Applicants must properly assess the harmful effects of their proposals on the natural environment/natural capital ⁷³ , seek to minimise the impact and give full consideration to achieving biodiversity net gains, in particular to species and habitats of particular <u>principal</u> importance (formerly known <u>as</u> BAP habitats)...	Editorial and typographic corrections

Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification
AM20	Supporting text to Policy DM37 paragraph 2.275 page 113	<p>Policy DM37 Green Infrastructure and Nature Conservation <i>Amend the last sentence of paragraph 2.275 of supporting text to read:</i></p> <p>A Natural Capital Investment Strategy for Sussex <u>2019</u> 74 is being prepared which when adopted will guide the implementation of this policy.</p>	Factual update.
AM21	Supporting text to Policy DM37 paragraph 2.277	<p>Policy DM37 Green Infrastructure and Nature Conservation <i>Amend the second and third sentences of paragraph 2.277 of supporting text to read:</i></p> <p>However, the City's green infrastructure encompasses more than this 'spatial backbone' and includes; street trees, residential gardens, green roofs/walls and landscaped/flood management areas including sustainable drainage systems (SuDS). Cycling/walking routes and manmade features designed to enhance biodiversity/recreation (e.g. bird/bat boxes and bee bricks) are also important to the overarching concept in the City.</p>	Typographical correction
AM22	Policy DM37 Footnote 75 page 113	<p>Policy DM37 Green Infrastructure and Nature Conservation <i>Delete repeated text from footnote 75 as follows:</i></p> <p>The South Downs Way Ahead Nature Improvement Area (NIA) is one of 12 NIAs that were announced by Government in February 2012. It sets a landscape scale approach to biodiversity and focuses on safeguarding endangered chalk grassland, vital for rare and endangered wildlife and the provision of clean drinking water and green space</p>	Editorial correction.
AM23	Supporting text to Policy DM37 paragraph 2.280 page 114	<p>Policy DM37 Green Infrastructure and Nature Conservation <i>Amend first sentence of paragraph 2.280 to read:</i></p> <p>Proposals must assess potential impacts on, nature conservation features (which includes geodiversity) <u>(see paragraph 2.282).</u></p>	For clarity.

Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification
AM24	Policy DM37 footnote 76 page 114	<p>Policy DM37 Green Infrastructure and Nature Conservation Amend footnote to read:</p> <p>The Sussex Biodiversity Record Centre (Woods Mill, Henfield) is the principal source of up-to -date desktop biodiversity information. The Booth Museum (Dyke Road, Brighton) <u>may also</u> holds <u>additional data, specifically regarding geodiversity</u> that may be relevant for nature conservation surveys.</p>	Factual correction
AM25	Supporting text to Policy DM37 paragraph 2.282 page 115	<p>Policy DM37 Green Infrastructure and Nature Conservation Amend second sentence to supporting text at paragraph 2.282 to read:</p> <p>Ecological reports should be produced in line with the British Standard on biodiversity management in planning and development BS42020:2013 and CIEEM Technical Guidance (and subsequent revisions).</p>	Editorial correction
AM26	Supporting text to Policy DM37 paragraph 2.282 page 115	<p>Policy DM37 Green Infrastructure and Nature Conservation Amend final sentence to supporting text at paragraph 2.282 to read:</p> <p>Opportunities to deliver higher carbon dioxide savings through greater passive design, fabric and energy efficiency measures and low and zero carbon technologies will also be required (see CP8 Sustainable Buildings and DM443 Energy Efficiency and Renewables)</p>	Editorial correction
AM27	Supporting text to Policy DM37 paragraph 2.285 page 116	<p>Policy DM37 Green Infrastructure and Nature Conservation Amend first sentence of paragraph 2.285 to read:</p> <p>Locally important sites include locally designated wildlife or geological sites; {local geological sites (LGeoS)} - (formerly called Regionally Important Geological and Geomorphological Sites (RIGGS)) of regional significance), local wildlife sites (LWS) and local nature reserve (LNRs).</p>	Editorial correction
AM28	Policy DM38, Footnote 81 Page 117	<p>Policy DM38 Local Green Spaces Amend footnote 81 to read:</p> <p>National Planning Policy Framework (NPPF) (2018) paragraphs 101 103 and 143-147-147-151.</p>	Factual update to paragraph number

Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification
			following updated NPPF 2021
AM29	Supporting text to DM40, Paragraph 2.308 Page 124	Policy DM40 Protection of the Environment and Health – Pollution and Nuisance This policy complements the AQAP by ensuring that all new developments adhere to the NPPF guidance that developments should contribute towards national objectives for pollutants (paragraph 184 <u>186</u> of the NPPF <u>2021</u>)	Factual update to paragraph number following updated NPPF 2021
AM30	Policy DM40 Footnote 91 Page 125	DM40 Protection of the Environment and Health – Pollution and Nuisance Amend footnote 91 to read: National Planning Policy Framework (NPPF) (2021), Paragraph 182 <u>186</u> .	Factual update to paragraph number following updated NPPF 2021
AM31	Policy DM44, footnote 103 Page 135	DM44 Energy Efficiencies and Renewables <i>Clarify Footnote 103:</i> 103: Carbon neutral recognises that it may not be possible to eliminate all emissions by this date, but that residual emissions can be off-set against carbon-positive measures such as tree planting. <u>The council will consider setting up a carbon offset scheme in the future.</u>	For clarification.
AM32	SA7 Benfield Valley Page 149	SA7 Benfield Valley <i>Add footnote to Figure 2 Illustrative Diagram:</i> <u>#Please note that this diagram is illustrative. Please view the Policies Map for detailed site allocation boundaries.</u>	For clarification that figure 2 is an illustrative diagram
AM33	Supporting text to Policy SSA4 Page 162	SSA4 Sackville Trading Estate <i>Amend supporting text at paragraph 3.34 to read:</i> 3.34 The site also falls within the Hove Station Neighbourhood Forum area. A draft Neighbourhood Plan has been produced and was <u>formally</u> consulted on in summer 2018 <u>Spring 2019</u> . The draft Plan	Factual update and to address representation by Hove Station

Mod. Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	Reason for Modification
		sets out aspirations and priorities for the site and wider area (identified in the draft Neighbourhood Plan as the Hove Station Quarter). <u>Once adopted the Neighbourhood Plan, will form part of the Development Plan for the city.</u>	Neighbourhood Forum
AM34	Footnote to SSA7, page 170	SSA7 Land Adjacent to American Express Community Stadium, Village Way Amend footnote text and weblink to: ¹⁵⁴ https://www.southdowns.gov.uk/planning/planning-advice/landscape/ South Downs Landscape Character Assessment (LCA) 2020	Factual update
AM35	Footnote 152, page 184	Policy H2 Housing Sites – Urban Fringe Amend Footnote 152 to read: ¹⁵² Brighton & Hove City Council Planning Advice Note 06 Food Growing and Development September 2011 <u>Updated September 2020</u>	Factual update
AM36	Footnote 154 page 185	Policy H2 Housing Sites – Urban Fringe Amend footnote text and weblink to: ¹⁵⁴ https://www.southdowns.gov.uk/planning/planning-advice/landscape/ South Downs Landscape Character Assessment (LCA) 2020	Factual update
AM37	Appendix 6 pages 221-223	Appendix 6 Proposed Changes to Policies Map – Tables 1 and 2 <i>Delete Appendix 6</i>	Editorial -description of changes not required for final adopted version of plan.

Table 2 Schedule of Additional Modifications to the CPP2 Implementation and Monitoring Plan (SD04)

Modification Number	Section, paragraph and page number	Additional Modification Proposed	Reason for Additional Modification
IMP1	DM1 Housing Quality, Choice and Mix	<p><i>Amend the following indicators for DM1 to read:</i></p> <p>LOI Percentage of residential units permitted⁴ meeting nationally described space standards <u>Percentage of residential units permitted not meeting nationally described space standard</u></p> <p>LOI Percentage of residential units permitted⁴ meeting minimum accessibility and adaptability standards set out in Building Regulation M4(2) <u>Percentage of residential units permitted that do not meet the minimum accessibility and adaptability standards set out in the Building Regulations (M4 (2)).</u></p>	It is considered easier to monitor exceptions to the policies and allow reasons to be analysed.
IMP2	DM12 Regional, Town, District & Local Centres, page 8	<p><i>Amend indicator, targets and trigger for Policy DM12 to read:</i></p> <p>LOI Number and percentage of units in Class A1 use <u>LOI Increase in the number of active commercial units in defined centres</u></p> <p>Targets: Regional, Town and District Shopping Centres Percentage of Class A1 retail units <ul style="list-style-type: none"> • Primary frontages 75% • Secondary frontages – Regional centre 35% – Town & District centres 30% <u>Local Shopping Centres 50% of Class A1 units</u> <u>Target: Net gain in number of commercial units</u></p> <p>Timescale: Ongoing monitoring through retail health checks <u>Timescale: Ongoing monitoring through health checks</u></p> <p>Trigger: Percentage of Class A1 units falls below target levels <u>Trigger: increase in vacancies in two successive health checks</u></p>	To ensure consistency with changes to the Use Classes Order, as amended pursuant to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 and to reflect proposed Main Modifications to policy.

		Action: Review policy approach and Development Management practice	
IMP3	DM13 Important Local Parades, Neighbourhood Parades and Individual shop units, page 9.	<p><i>Amend indicator, targets and trigger for Policy DM13 to read:</i></p> <p>LOI Number and percentage of units in Class A1 use in Important Local Parades <u>LOI Increase in the number of active commercial units in Important Local Parades</u></p> <p>Target: At least 50% units in Important Local Parades to remain in Class A1 use <u>Target: Net gain in number of commercial units</u></p> <p>Timescale: Ongoing monitoring through retail health checks <u>Timescale: Ongoing monitoring through health checks</u></p> <p>Trigger: Percentage of Class A1 use units falls below target levels <u>Trigger: Percentage of vacant units increases</u></p> <p>Action: Review policy approach and Development Management practice</p>	To ensure consistency with changes to the Use Classes Order, as amended pursuant to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 and to reflect proposed Main Modifications to policy.
IMP4	DM25 Communications Infrastructure	<p><i>Amend indicator and target for DM25 to read:</i></p> <p>Indicator: LOI Appropriate Implementation and siting of modern communications Infrastructure <u>Appeal success rate for applications where appearance/ impact on setting/ clutter are principal issues.</u></p> <p>Targets: No specific target <u>70% appeals dismissed where appearance/ impact on setting/reducing clutter are principal issues</u></p> <p>Timescale: Ongoing Annual <u>monitoring through Plan period</u></p>	To provide an indicator and target to allow the effectiveness of the policy to be monitored.

IMP5	DM39 Development on the Seafront	<p><i>Amend indicator, target and trigger for DM39 to read:</i></p> <p>Indicator: Policy CP11 indicator <u>Policy SA1 indicators</u></p> <p>Targets: No specific target <u>Targets as per CP11 and SA1</u></p> <p>Trigger: Not applicable <u>As for Policy CP11 and SA1</u></p>	To include reference to relevant targets and triggers referred to for CPP1 Policy SA1 The Seafront
IMP6	DM44 Energy Efficiencies and Renewables, page 27	<p><i>Amend target for Policy DM44 to read:</i></p> <p>Target: All developments including conversions and changes of use to <u>New residential created through conversions and changes of uses of existing buildings and for non-residential development (non-major and major) including conversions and changes of use to</u> achieve at least 19% improvement on carbon emission targets set by Part L of Building Regulations <u>until superseded by Future Homes Standards and Future Building Standards or interim uplift in Part L if greater than 19%.</u></p>	To reflect proposed changes to policy and government announcements and Main Modifications to DM44.
IMP7	SA7 Benfield Valley	<p><i>Amend indicator, target and trigger for DM39 to read:</i></p> <p>Indicator: No specific indicator <u>Addressed by Policies DM37, DM38 and H2</u></p> <p>Targets: No specific target</p> <p>Trigger: Not applicable <u>Addressed by Policies for Policy DM37, DM38 and H2</u></p>	To include cross reference to relevant indicators, targets and triggers under DM37, DM38 and H2.
IMP8	SSA1 – Brighton General Hospital Site, Elm Grove	<p><i>Amend target for Policy SSA1 to read:</i></p> <ul style="list-style-type: none"> • 10,000 – 12,000 sq m health and care facility (D1E(e)); 	To ensure consistency with changes to the Use Classes Order, as amended pursuant to the Town

			and Country Planning (Use Classes) (Amendment) (England) Regulations 2020
IMP9	SSA2 – Combined engineering Depot, New England Road, page 30	<p><i>Amend target for Policy SSA2 to read:</i></p> <ul style="list-style-type: none"> 1,000 sq m B1 <u>E(g)</u> workspace and managed starter office units. 	To ensure consistency with changes to the Use Classes Order, as amended pursuant to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020
IMP10	SSA3 Land at Lyon Close, page 31	<p><i>Amend target for Policy SSA3 to read:</i></p> <ul style="list-style-type: none"> 5,700 sq m net B1a <u>E(g)</u> office D1 health facilities (GP surgery) and/or 	To ensure consistency with changes to the Use Classes Order, as amended pursuant to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020
IMP11	SSA4 Sackville Trading Estate and Coal Yard, page 32	<p><i>Amend target for Policy SSA4 to read:</i></p> <ul style="list-style-type: none"> 6000m2 <u>E(g)</u>B1-employment floorspace 	To ensure consistency with changes to the Use Classes Order, as amended pursuant to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020
IMP12	E1 – Opportunity Site for Business and Warehouse Uses	<p><i>Amend target and trigger for Policy E1 to read:</i></p> <p>Target: No specific target or timescale No consent by 2030</p> <p>Trigger: -Not applicable <u>Review through City Plan Part One</u></p>	To include a timescale and trigger

Brighton & Hove City Council

Tourism, Equalities, Communities and Culture Committee

Agenda Item 84

Subject: Listed Building Heritage Partnership Agreement for the University of Sussex

Date of meeting: 10 March 2022

Report of: Executive Director of Economy, Environment & Culture

Contact Officer: Name: Tim Jefferies
Tel: 01273 293152
Email: tim.jefferies@brighton-hove.gov.uk

Ward(s) affected: Stanmer

For general release

1. Purpose of the report and policy context

- 1.1 This report seeks approval for an updated Listed Building Heritage Partnership Agreement (the Agreement) with the University of Sussex and Historic England (formerly English Heritage), following a review of its operation since it was signed in April 2015.
- 1.2 The primary purpose of the Agreement is to grant Listed Building Consent for certain types of work to the eight high-grade listed buildings on the University's campus at Falmer.

2. Recommendations

- 2.1 That Committee agree entering into an updated Listed Building Heritage Partnership Agreement with the University of Sussex and Historic England for land at the University of Sussex under the Planning (Listed Buildings and Conservation Areas) (Heritage Partnership Agreements) (England) Regulations 2014.
- 2.2 That Committee delegates authority to sign the Listed Building Heritage Partnership Agreement to the Head of Planning.

3. Context and background information

- 3.1 Listed Building Heritage Partnership Agreements may be entered into between local planning authorities and owners of large scale listed buildings or major groups of similar listed buildings. They provide owners and local planning authorities with the means of agreeing various matters concerning the management of listed buildings.
- 3.2 In April 2015 a Listed Building Heritage Partnership Agreement was signed for the eight grade I and grade II* listed buildings at the University of Sussex campus at Falmer. It was only the second such Agreement in England

following the introduction of new legislation in 2014. This is a 10-year Agreement with provision for review at year 5 (2020). That review was delayed until 2021 due to the need for University's staff to concentrate on the response to the pandemic but has now been completed by the partners.

- 3.3 The main function of the Agreement is to grant Listed Building Consent for certain types of work. These Consented Works (the type 2A works) are set out in Part 7 and Annex E of the Agreement and are generic and repetitive works that apply similarly to a number of the listed buildings at the University. They include works to repair or replace external historic fabric; works to original internal fixtures and finishes to enable the University to meet modern teaching expectations; and works required for safety and/or accessibility reasons.
- 3.4 The Agreement would ensure that the Consented Works are carried out in an appropriate manner or design and/or using appropriate details and materials. In order to meet this, each of the Consented Works would be subject to particular conditions as set out in Part 7 of the Agreement.
- 3.5 The Agreement also clarifies the position in respect of other types of work as follows:
- Type 1 works are works which can be categorised as 'de minimis'.
 - Type 2B works are those for which it has been agreed that the University may apply for a Certificate of Lawful Proposed Works, which provide certainty over works that are judged to not require Consent provided they are carried out in a certain way. Details of these are included at Annex F.
 - Type 3 works are those kinds of works which will always need Listed Building Consent and do not fall under the Agreement.
- 3.6 The recent review of the Agreement confirmed that it has worked very well and is greatly valued by all three partners. For the University it has provided greater certainty and enabled forward planning of works to the buildings. For the council it has resulted in a reduction in the number of individual applications (for which no fee is payable) and has prevented the need to investigate potential unauthorised works.
- 3.7 The review found that no major changes were necessary to the agreement but that some additional Consented Works are necessary to address matters that have become apparent since 2015. Additional Type 2B works have also been added and minor textual updating has been carried out. All new or revised text is coloured in red.

4. Analysis and consideration of alternative options

- 4.1 If the Agreement is not updated it will expire in April 2025 and in the meantime specific Listed Building Consent applications may be required to in respect of certain types of work.

5. Community engagement and consultation

- 5.1 The Regulations that accompany the legislation require that the Council must publicise the Agreement on its website for a minimum of 28 days and by means of a site notice. Such publicity was carried out on the draft document between 17 January and 14 February 2022. Local amenity

societies were notified of the draft via the Conservation Advisory Group and the 20th Century Society was specifically consulted as the national society with a specific interest in buildings of this period.

- 5.2 The Regulations also require that Historic England be consulted on the draft Agreement, though in this case they are also one of the partners to it.
- 5.3 Historic England responded to advise that it is pleased to endorse this proposed update of the HPA for University of Sussex. No other representations were received.

6. Conclusion

- 6.1 The updated Agreement would provide for a consistent, carefully controlled and cost-effective means of managing future changes to the high-grade listed buildings at the University of Sussex.

7. Financial implications

- 7.1 There are no direct financial implications arising from the recommendations of this report. The cost of officer time associated to producing the updated Listed Building Heritage Partnership Agreement has been met from the existing revenue budget for the Policy, Projects and Heritage team.

Name of finance officer consulted: John Lack Date consulted: 15/02/22

8. Legal implications

- 8.1 The Planning (Listed Buildings and Conservation Areas) (Heritage Partnership Agreements) Regulations 2014 require that where a local planning authority proposes to make a listed building heritage partnership agreement it must consult Historic England ('the Commission') and make the agreement available for public inspection for a period of not less than 28 days.

Name of lawyer consulted: Alison Gatherer Date consulted: 17/02/22

9. Equalities implications

- 9.1 The Agreement covers works to doors that would assist in making the buildings more accessible for all.

10. Sustainability implications

- 10.1 The Agreement includes granting Consent for replacement of existing single-glazed metal windows with double-glazed metal windows, so improving the energy efficiency of the buildings.

11. Other Implications

- 11.1 None

Supporting Documentation

1. Background documents

1. Listed Building Heritage Partnership Agreement relating to land at the University of Sussex (2022)
2. Representation from Historic England

Brighton & Hove City Council

Tourism, Equalities, Communities & Culture Committee

Agenda Item 85

Subject: Local Development Scheme Update

Date of meeting: 10 March 2022

Report of: Executive Director, Economy Environment & Culture

Contact Officer: Name: Steve Tremlett
Tel: 01273 29
Email: steve.tremlett@brighton-hove.gov.uk

Ward(s) affected: All

For general release

1. Purpose of the report and policy context

- 1.1 The purpose of this report is to seek approval of the revised Local Development Scheme (LDS). This is the three-year work programme setting out the timetable for the preparation of planning documents produced by the Local Planning Authority, including those that make up the development plan for Brighton & Hove. It covers the period from 2022 to 2025.

2. Recommendations

- 2.1 That Committee approves the revised Local Development Scheme 2022 – 2025, attached as Appendix 1.

3. Context and background information

- 3.1 All Local Planning Authorities (LPAs) are required to prepare and maintain a Local Development Scheme (LDS) under s15 of the Planning and Compulsory Purchase Act 2004. The LDS is a public statement of a LPA's programme for the production of Development Plan Documents (DPDs), the subject matter and geographical area to which each is to relate, and which are to be prepared jointly with one of more other LPAs. It also sets out the programme for preparing other planning documents, for example Supplementary Planning Documents, and provides an update on the progress of neighbourhood plans in the city. The 2004 Act provides that a LPA must revise its LDS as such time as they consider appropriate or when directed to do so by the Secretary of State.
- 3.2 DPDs set out policies on the development and use of land in a local authority area. The LDS outlines in advance when public consultations are due to take place, when DPDs are expected to be submitted to the Secretary of State for public examination, and when they are expected to be adopted.
- 3.3 The previous LDS was published in 2020 to cover the period 2020-2023 and an update is now required to ensure the document is up-to-date.

3.4 Key updates in this iteration of the LDS include:

- An update to the timetable for the production of City Plan Part Two;
- Amendments to the timetable for the current targeted review of certain policies in the Waste & Minerals Local Plan to reflect slippage against the previously published timetable
- An indicative timetable for the review of City Plan Part One.
- An indicative timetable for a full review of the Waste & Minerals Local Plan.
- An updated list of adopted Supplementary Planning Documents to reflect the recent adoption of the Urban Design Framework and Hove Station Area Masterplans
- Updates on the progress of Neighbourhood Plans in the city.

3.5 Full details and timetables are set out in the revised LDS, which is included as an appendix to this report.

3.6 The council's performance against the LDS timetable is assessed in the Authority Monitoring Report (AMR) which is published annually.

4. Analysis and consideration of alternative options

4.1 The council is required by planning legislation to produce and maintain an up-to-date LDS. The alternative options considered and evaluated in preparing the LDS relate to the type of development plan documents to be prepared over the next three years, how they will be resourced and prioritised, and when the key stages will be undertaken. The proposed timetable is considered the best option with the resources available.

5. Community engagement and consultation

5.1 The LDS is not subject to public consultation, however the production of all DPDs, SPDs and Neighbourhood Plans set out within it include stages of public consultation.

6. Conclusion

6.1 Approval of the LDS will ensure that there is an up-to-date timetable for preparing development plan documents in accordance with planning legislation. The approved LDS will be published on the Council's website.

7. Financial implications

7.1 There are no direct financial implications as a result of the revised Local Development Scheme. The costs of preparing the revised Local Development Scheme has been and will be met from existing revenue budgets.

Name of finance officer consulted: John Lack Date consulted: 09/02/22

8. Legal implications

- 8.1 The statutory background to the requirement to produce and revise a local development scheme is set out in the body of the report.

Name of lawyer consulted: Hilary Woodward Date consulted: 10/2/22

9. Equalities implications

- 9.1 None relevant to this report.

10. Sustainability implications

- 10.1 None relevant to this report.

11. Other Implications

- 10.2 None relevant to this report.

Supporting Documentation

1. Appendices

1. Revised Local Development Scheme 2020-2023

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1. Introduction

2. This is the 2022 version of the Local Development Scheme (LDS) produced by Brighton & Hove City Council. This document replaces the previous version of the LDS that was published in 2020. The LDS sets out the programme for the production of Local Development Documents (LDDs) and other planning documents in Brighton & Hove over the next three years

2. The Local Development Scheme 2022-2025

Documents set out in the Local Development Scheme

3. Local Development Documents fall into three categories:
 - Development Plan Documents (DPDs): DPDs are planning policy documents that form the development plan for the area.
 - Supplementary Planning Documents (SPD) and;
 - Statement of Community Involvement (SCI).
4. The council also produces this Local Development Scheme and the Authority Monitoring Report, which sets out annually the progress of adopting and implementing DPDs.
5. The development plan for Brighton & Hove consists of the City Plan Part One (2016), the Waste and Minerals Plan (2013), the Waste and Minerals Sites Plan (2017), and the Shoreham Harbour Joint Area Action Plan (2019).
6. The City Plan Part Two is at a late stage of production and will form part of the development plan once adopted (expected in autumn 2022). Some policies in the Brighton & Hove Local Plan (2005) are saved until CPP2 is adopted and remain part of the development plan.

Development Plan Documents

7. The adopted documents set out below form the statutory development plan for Brighton & Hove. Additionally, a number of policies in the Brighton & Hove Local Plan (2005) have been saved, and will continue to form part of the development plan for Brighton & Hove until replaced by new policies in the City Plan Part Two once adopted.
8. Development Plan Documents are an important mechanism in helping to deliver a number of Brighton & Hove's citywide strategies. These include the economic, local transport, housing, community safety, climate change, tourism, sports and cultural strategies.

Adopted Development Plan Documents

CITY PLAN PART ONE	
Adopted	2016
Role and Subject	To provide an overall strategic vision for development in the city to 2030. It sets out the priorities to meet the challenges of the future; and identifies the broad locations, scale and type of development, as well as the supporting infrastructure required, to 2030.
Coverage	Brighton & Hove, excluding the South Downs National Park

EAST SUSSEX, SOUTH DOWNS AND BRIGHTON & HOVE WASTE AND MINERALS PLAN	
Adopted	2013
Role and Subject	Sets out the vision, objectives and strategy for sustainable waste development and minerals production in the area and provides the policy framework for development control decisions.
Coverage	Brighton & Hove and East Sussex, including that part which falls within the South Downs National Park

EAST SUSSEX, SOUTH DOWNS AND BRIGHTON & HOVE WASTE AND MINERALS SITES PLAN	
Adopted	2017
Role and Subject	Identifies sites which are potentially suitable for new waste management facilities whilst safeguarding existing waste management sites. It also safeguards railheads and wharves that could be used for bulk transport of waste and minerals.
Coverage	Brighton & Hove and East Sussex, including that part which falls within the South Downs National Park

SHOREHAM HARBOUR JOINT AREA ACTION PLAN	
Adopted	2020
Role and Subject	To set out a vision, objectives, strategies, policies and detailed site allocations for Shoreham Harbour. Produced by the Shoreham Harbour Regeneration Partnership which includes Adur District Council, Brighton & Hove City Council, Shoreham Port Authority and West Sussex County Council.
Coverage	Shoreham Harbour and South Portslade area

Development Plan Documents in Preparation

- The following documents are currently being prepared and will form part of the development plan for the city once adopted.

City Plan Part Two

OVERVIEW	
Role and Subject	This document complements the adopted CPP1 and includes additional site allocations and detailed development management policies.
Coverage	Citywide

TIMETABLE	
Stage	Dates
Scoping consultation	Completed
Reg 18: Draft plan consultation	Completed
Proposed Submission consultation (Reg. 19)	Completed
Submission of Plan to Government	Completed
Examination hearings	Completed
Consultation on Main Modifications	Spring 2022
Inspector's report	Summer 2022
Estimated date for adoption by the council	Autumn 2022

Waste and Minerals Local Plan Review

OVERVIEW	
Role and Subject	The Waste and Minerals Local Plan Review is principally intended to update some adopted minerals policies following representations made at the Public Examination of the Waste & Minerals Sites Plan in summer 2016.
Coverage	East Sussex and Brighton & Hove including part of the South Downs National Park

TIMETABLE	
Stage	Dates
Call for Sites / Content (Reg18)	Completed
Preferred Strategy Consultation	Completed
Pre-Submission Consultation (Reg 19)	Winter 2021
Submission of Plan to Government	Spring 2022
Public Examination	Summer 2022
Estimated date for Adoption	Winter 2022/23

Proposed Development Plan Documents

10. The following documents are proposed, with substantive work yet to begin.

City Plan Part One Review¹

OVERVIEW	
Role and Subject	A review of the updated City Plan Part One. Policies will be revised to take into account changes in national policy, local priorities and other changes in circumstance.
Coverage	Citywide

TIMETABLE	
Stage	Date
Assessment of Scope of Review	Completed
Evidence gathering	2022
Early engagement and scoping	2022-23
Preferred Strategy Consultation (Reg 18)	Late 2023
Pre-Submission Consultation (Reg 19)	Summer 2024
Submission of Plan to Government	Late 2024
Public Examination	2025
Adoption	2025

11. The City Plan Part One reached five years since adoption in March 2021 and in line with national planning policy the council undertook an assessment of the need to review to the Plan. The outcome of this process was reported to Tourism, Equalities, Communities & Culture Committee in March 2021, where the recommendation for a comprehensive review was agreed.

12. The timetable for the latter stages of the Review is subject to considerable uncertainty and may also be impacted by the nature of the expected forthcoming changes to the planning system. The Local Development Scheme will be updated appropriately should the timetable change.

13. The government published initial proposals for wholesale reform to the planning system and the Local Plan preparation process in the 'Planning for the Future'

¹ The name of the reviewed Plan is yet to be confirmed.

White Paper in August 2020. The government's response to the public consultation has not yet been published, and any reforms taken forward will not be implemented until primary and secondary legislation has passed through parliament and updates made to the National Planning Policy Framework. The outcome of this process may also affect the timetable and process for the review of City Plan Part One.

Full Review of the Waste & Minerals Local Plan

OVERVIEW	
Role and Subject	A comprehensive review of the Waste & Minerals Local Plan. Policies will be revised to take into account changes in national policy, local priorities and other changes in circumstance.
Coverage	Citywide

INDICATIVE TIMETABLE	
Stage	Date
Evidence gathering	2022-23
Preferred Strategy Consultation (Reg 18)	Late 2023
Pre-Submission Consultation (Reg 19)	Summer 2024
Submission of Plan to Government	Late 2024
Public Examination	Spring 2025
Adoption	Autumn 2025

14. The East Sussex, South Downs and Brighton & Hove Waste & Minerals Plan was adopted in 2013 with a plan period running to 2026/27. A targeted review of a small number of policies is currently underway with adoption of revised policies estimated for Winter 2022/23 (see above). A full review will then be needed in order to fully update the Local Plan. The timetable above is indicative and subject to review

Links between Development Plans and Other Strategies

15. When preparing all plans, the Council seeks to ensure that its proposals are integrated with, and complimentary to, a range of adopted policies and strategies.

16. Other strategies produced by the council that are considered in the preparation of DPDs include:

- Carbon Neutral 2030 Programme
- Housing Strategy

- Economic Strategy
- Visitor Economy Strategy
- Local Transport Plan
- Sustainable Community Strategy
- Health and Wellbeing Strategy
- Community Safety and Crime Reduction Strategy.

17. The Council also works closely with neighbouring local authorities to support the development of their LDDs and to ensure that cross boundary issues are dealt with effectively including, when required, making representations at Local Plan Examinations as part of the Duty to Cooperate.

Supplementary Planning Documents (SPDs)

18. SPDs listed below provide additional guidance and information relating to the implementation of policies contained in DPDs. They do not form part of the statutory development plan for the city but a material consideration in the determination of planning applications.

Document Name	Document Type	Date Adopted
Brighton Centre Design Framework	SPD01	Jan 2005
Shopfront Design	SPD02	Sep 2005
Construction and Demolition Waste	SPD03	Mar 2006
Circus Street and Municipal Market Site	SPD05	Mar 2006
Trees and Development Sites	SPD06	Mar 2006
Advertisements	SPD07	Jun 2007
Architectural Features	SPD09	Dec 2009
London Road Central Masterplan	SPD10	Dec 2009
Nature Conservation and Development	SPD11	March 2010
Design Guide for Extensions and Alterations (updated)	SPD12	Jan 2020
Shoreham Harbour Flood Risk Management Guide	SPD13	Sep 2015
Parking Standards	SPD14	Oct 2016
Toad's Hole Valley	SPD15	Sep 2017
Sustainable Drainage	SPD16	Sep 2019
Urban Design Framework	SPD17	June 2021
Hove Station Area Masterplan	SPD18	November 2021

19. The table below shows the key milestones for currently programmed forthcoming SPDs as well as a description of each document. Further SPDs may be produced during the three-year period covered by this LDS subject to need and resources.

SPD	Description	Public Consultation	Proposed date for Adoption
Nature Conservation	To provide further detail on the interpretation and application of planning policies relating to nature conservation and biodiversity.	February – March 2022	September 2022
Eastern Seafront Masterplan	The preparation of a masterplan for the Eastern Seafront will help support high-quality, innovative regeneration through improving access, activation of the seafront, coherent place-making, environmental enhancement and protection of the world class heritage assets	June - July 2022	September 2022
Brighton Marina Masterplan	A masterplan to shape future development proposals in Brighton Marina	tbc	tbc
Liveable City	A framework for delivering a future city centre within the context of a post-covid environment, changes to the retail market, new transport measures and regeneration sites.	tbc	tbc

Neighbourhood Planning

20. Neighbourhood planning allows parish councils and neighbourhood forums to draw up a Neighbourhood Development Plan (NDP) for their area; once adopted, these plans become Development Plan Documents and guide decision-taking for the areas covered. Neighbourhood planning is community-led, with support provided by the Local Planning Authority. The timetable for preparing neighbourhood plans, and the primary resources for doing so, are the responsibility of the Parish Council or Neighbourhood Forum.

21. Five areas of the city are working towards the preparation of neighbourhood plans. These are summarised below:

- **Hove Station** – public examination commenced in January 2022 and is expected to take two to three months to complete.
- **Rottingdean Parish Council** – a draft plan was consulted on in Spring 2021.
- **Brighton Marina** – an application for re-designation of the Neighbourhood Forum was approved in November 2020. A draft plan is being prepared for regulation 14 consultation.
- **Hangleton and Knoll** – evidence gathering underway to inform a draft plan.
- **Hove Park** - evidence gathering underway to inform a draft plan.

- **Coldean** –in November 2021 the area was designated as a Neighbourhood Area and a Neighbourhood Forum was established

22. Further details can be found on the council's website², where the progress of these plans is recorded and updated.

Supplementary Planning Guidance

23. A number of Supplementary Planning Guidance documents linked to the adopted Brighton & Hove Local Plan are saved and remain material considerations in the determination of planning applications. The saved SPGs are listed in the table below.

	Supplementary Planning Guidance Note and date	Saved Policy in the Brighton & Hove Local Plan
SPG02	External Paint Finishes and Colours – October 1998	HE1 Listed Buildings HE6 Development within or affecting the setting of conservation areas
SPG10	King Alfred/RNR Site: Planning Brief	HO1 Housing sites and mixed-use sites with an element of housing It was SR24 which has been replaced by SA1
SPG11	Listed building interiors – September 2003	HE1 Listed Buildings
SPG15	Tall Buildings – January 2004	QD1-QD4 Design policies
SPG19	Fire Precaution Works to Historic Buildings – May 2004	HE1 Listed Buildings
SPG20	Brighton Marina – An Urban Design Analysis	SR5 - Town and district shopping centres
SPG21	Sustainability Checklist – May 2004	SU2 Efficiency of development

Community Infrastructure Levy

24. The Community Infrastructure Levy (CIL) allows local authorities in England and Wales to raise funds from certain types of new development for strategic infrastructure to support growth. The council published its adopted CIL Charging Schedule in May 2020 and implemented CIL charges from 5 October 2020. Further information is available on the Council's website³.

3. Monitoring and Review

25. The performance of the council against the LDS timetable is monitored in the Authority Monitoring Report (AMR), published annually. on the council's website.

² www.brighton-hove.gov.uk/content/planning/neighbourhood-planning

³ www.brighton-hove.gov.uk/content/planning/planning-applications/community-infrastructure-levy-cil

26. The AMR provides information on the following:

- performance against the timetable as set out in the LDS;
- the effectiveness of saved policies;
- the effectiveness of new policies (in the future it may determine the timetable for review of local development documents);
- an up-to-date list of superseded and 'saved' policies;
- the effectiveness of the Statement of Community Involvement; and
- the amount of new housing currently being delivered and likely to be delivered in the future.

27. The information in the AMR is used to identify work priorities. The LDS will be reviewed as the need for further documents emerges and to ensure that a three-year programme is maintained.

Glossary

Term	Definition
Authority Monitoring Report (AMR)	An assessment of the progress against the LDS Includes a commentary on the performance of policies. Published annually.
Area Action Plans (AAPs)	These provide a planning framework to cover key areas of change or conservation.
Background Documents	Technical documents that inform the production of LDDs, for example an Urban Capacity Study.
City Plan	The City Plan is in two parts. Part One sets out the vision and spatial strategy for the area and addresses important spatial matters including housing, the economy, retail, community safety, tourism, transport issues, areas of regeneration and social infrastructure. A map illustrates the spatial vision for the city. Part Two of the City Plan will contain the remaining site allocations and detailed development management policies.
Development Plan Documents (DPDs)	The principal Local Development Documents. These are subject to statutory requirements, including submission to the Secretary of State, formal testing through an independent examination and a binding Inspector's report.
Independent Examination	All DPDs are subject to independent examination by a planning inspector. The inspector carries out an assessment of the soundness of the document.
Local Development Documents (LDDs)	The collective term for all DPDs, SPDs and the SCI.
Local Development Scheme (LDS)	The document you're reading now. This sets out a three-year rolling project plan for the preparation and delivery of the various LDDs. The purpose of the LDS is to inform the public about the production and function of Local Development Documents and the timescales they can expect for the preparation and review of these documents.
Local Plan	For clarity, used only to refer to the Brighton & Hove Local Plan 2005 (however, the NPPF glossary sets out the legal definition).

Term	Definition
Policies Map	This shows existing and revised designations of areas of land such as conservation areas and development areas. It also defines the specific sites for particular future land uses or developments, and the areas to which policies apply.
Site Allocations	Particular sites in the city are allocated specifically for certain uses in development plan documents including housing, affordable housing, employment land, retail, leisure, social, health and education. They are shown on the policies map.
Saved Plan	Certain existing plans will be “saved”, that is they remain a material consideration as part of the development plan and are Local Development Documents, until replaced by policies in a new development plan document.
Statement of Community Involvement (SCI)	Sets out how the community is to be engaged in the process of producing Local Development Documents and sets standards for involving the community in the preparation, alteration and continuing review of all local development documents.
Supplementary Planning Documents (SPDs)	These are consistent with parent DPDs and provide additional guidance on how policies and/or specific site allocations are to be implemented. They are a material consideration in the determination of planning applications.
Sustainability Appraisal	Sustainability Appraisal is a systematic process to appraise the social, economic and environmental effects of the strategies and policies of a planning policy document. It must be applied to Development Plan Documents and should incorporate the requirements of the Strategic Environmental Assessment Directive.

Brighton & Hove City Council

Tourism, Equalities, Communities & Culture Committee

Agenda Item 86

Subject: The Queen's Platinum Jubilee Celebrations: Update

Date of meeting: 10 March 2022

Report of: Executive Director, Economy, Environment & Culture

Contact Officer: Name: Chloe Sands
Email: Chloe.sands@brighton-hove.gov.uk

Ward(s) affected: All

For general release

1. Purpose of the report and policy context

- 1.1 On 6th January 2022 Brighton & Hove City Council received a letter (Appendix 1) from Rt Hon Michael Gove MP highlighting some of the opportunities that exist for councils and communities to engage with to celebrate the Platinum Jubilee. They want celebrations this year to be larger than previous years of national celebrations and for as many people as possible to participate.
- 1.2 The Department for Digital, Culture, Media and Sport has created a [Platinum Jubilee website](#) which has useful resources and an interactive event map which people and organisations are being encouraged to contribute to.
- 1.3 This paper follows on from the introductory paper that went to TECC Committee on 25th November 2021. It looks in greater detail at the projects BHCC are leading on and involved in, more specifically, those that relate to the areas listing in the letter received on 6th January 2022.

2. Recommendations

- 2.1 That Committee notes the progress to date on preparations for the Jubilee celebrations.

3. Context and background information

- 3.1 February 6th 2022 marked the day that Her Majesty The Queen became the first British Monarch to celebrate a Platinum Jubilee, seventy years of service. There will be year-long celebrations throughout the United Kingdom and Commonwealth celebrating The Queen's historic reign.
- 3.2 The [programme of events](#) include Her Majesty and members of the Royal Family undertaking a variety of engagements around the country; an extended [bank holiday](#), from 2nd to 5th June, to allow people to come together to celebrate; Trooping the Colour for the Queen's Birthday; lighting of beacons; and other events throughout June.

- 3.3 A Platinum Jubilee Project Group has been set up to coordinate the work taking place across the council and we now have a [webpage](#) dedicated to The Queen's Platinum Jubilee. Information about local events and how people can get involved will be added soon.
- 3.4 **Plan for local celebrations.** The Outdoor Events team are working on the 2022/23 programme of events and the project steering group are collating a central calendar of Jubilee related events that are taking place. The Mayor will be involved in various Jubilee-related events across the city, including setting off and greeting cyclists taking part in the Platinum Jubilee Charity Cycle Ride, planting a Jubilee tree in honour of Her Majesty at Stanmer Park and hosting a Royal Picnic.

Street Parties.

- 3.5 The application process for Platinum Jubilee street parties is detailed on the council's web site. This process allows the public to request road closures. A team in City Transport assess the implications of a closure and ensure that the process has been followed. Each closure is considered in terms of congestion and transport implications alongside ensuring that necessary insurances etc. are in place. For a street party, Public Liability Insurance is not required, it is only recommended.
- 3.6 The application form, petition form and important information for street party road closures have been updated and are now available on the website. The wording for the dedicated webpage is still under review, and it is anticipated this will be updated w/c 14th Feb. The deadline for applications for road closures is 3rd April. Signatures for the petition cannot be collected until the 13th March, as the signatures need to be within 12 weeks of the actual event.
- 3.7 There may be implications if there are a significant volume of requests received for The Queen's Jubilee bank holiday weekend as there is finite resource available to deal with them. The notice period may have to be extended to accommodate the number of requests, but this will be managed in due course.
- 3.8 Council tenants and leaseholders wishing to put on a street party or event where they live may be able to access funding through the [Estate Development Budget](#) (an ongoing programme for council tenants and leaseholders to use to fund projects and activities where they live). Residents' groups will be encouraged to apply for such activities through the Quick Bid element which provides awards of up to £1000 to residents' groups. Information on how to access this will be included on the dedicated council webpage.
- 3.9 When permission is granted for a road closure, the organiser will also be asked if they are interested in the media attending, and if so, to contact the Communications/News Team direct. It was also suggested that there could be a section on the dedicated webpage about the media visiting street

parties and asking organisers to give their consent with contact details by email.

The Big Jubilee Lunch – 2 to 5 June 2022.

- 3.10 The Big Jubilee Lunch encourages communities to come together, celebrate their connections and get to know each other a little bit better and will bring the Jubilee celebrations into the heart of every community.
- 3.11 There is already a dedicated resource providing information and support on this from [‘Eden Project Communities’](#) so BHCC’s website will sign-post to this.

Beacon Lighting.

- 3.12 Three beacons have been identified in the Brighton & Hove area: Hove Beacon; Norfolk Groyne, near the Peace Statue; and Beacon Hill, Rottingdean.

Hove Beacon Lighting Project.

- 3.13 The Hove Beacon Lighting project is an exciting initiative for the city and its residents, which will see the creation of an aesthetically pleasing lighting scheme for the Hove Beacon that will help to provide a welcoming atmosphere for evening strollers, improve views towards Hove from afar, and enhance the night-time image of Hove and the seafront.
- 3.14 The Hove Beacon formed part of a national network of beacons used to alert the public against the Spanish Armada. These historic signal beacons are visible across the Sussex coastline, but the towering beacon in Hove is a distinctive landmark. A replica of the original now stands on the esplanade, with a distinctive fire basket at the top. It was symbolically lit, along with the other beacons in the chain, in 1988 for the 400th anniversary of the defeat of the Spanish Armada. Plans are in place for it to be permanently relit and for it to be celebrated as part of the Queens Jubilee celebrations in June 2022.
- 3.15 A brief, inviting lighting designers to submit an application, was circulated in September via the Culture in our City website and other arts listings; and a lighting designer will be recruited in November to complete and install a workable lighting scheme so that the beacon can be relit for the Queen’s Jubilee in June 2022. The aimed completion for the new lighting installation is the end of March 2022.
- 3.16 The Beacon structure has been assessed to ensure it is in the right condition to house the new lighting installation and the report concluded that the basket will need to be replaced. The Arts Development Team are working to appoint a blacksmith to create a replica of the current basket.
- 3.17 A budget of £15,000 has been allocated for restoring and lighting the Hove Beacon.

Norfolk Groyne.

- 3.18 The lighting of a Beacon at Norfolk Groyne is being explored by the Outdoor Events Team.

Beacon Hill.

- 3.19 City Parks is working with the Beacon Hill Management Group and Rottingdean Parish Council to facilitate a beacon on Beacon Hill for the Queen's Platinum Jubilee following a request from the British Legion.
- 3.20 Permission is given subject to the beacon being constructed on corrugated iron, as requested by the county archaeologist, and in the location agreed with Natural England (identified as What3Words ['rent.springing.duet'](#)). The permission is also subject to clean wood being used (no metal work).
- 3.21 City Parks will mow the location from the beginning of the growing season to reduce the fire risk and to discourage skylarks from nesting in the area (to avoid them being disturbed at the time of the beacon lighting).

Local Authority Owned Civic Amenities Organised Platinum Jubilee Events.

- 3.22 The Library service will be receiving a grant of £1000 from Arts Council England to mark the occasion and will be using this grant in several ways. The library service would like to ensure that families who may be disadvantaged don't miss out on the Jubilee Celebrations, so we are planning to put on free events with food for disadvantaged families during the May half term holiday. We are working with a performing arts duo and partner organisations to put on two performances in Jubilee Library children's area for targeted groups. We will run bunting-making workshops to decorate the library and commission some of the adult participants to contribute to providing multicultural dishes for lunch for all participants.

Council-Led Large-Scale Platinum Jubilee Events

- 3.23 The incoming Mayor will be hosting a Royal Picnic, to celebrate Her Majesty the Queen's Platinum Jubilee, on the 3rd June. The details of this event are currently being explored by the Mayoral Office.

The Platinum Jubilee Emblem.

- 3.24 The official emblem features on BHCC's dedicated webpage and will be used, where necessary, as information is added. It is available to download, along with usage guidelines, [here](#).

The Queen's Green Canopy.

- 3.25 The Queen's Green Canopy is an initiative created to mark the Platinum Jubilee which encourages people across the United Kingdom to "Plant a Tree for the Jubilee".

- 3.26 Brighton and Hove City Parks team are planning a Queen's Green Canopy planting event at The Bristol Estate on 24th February 2022, in conjunction with Plant Your Postcode ([CPRE Sussex](#)) and Trees For Cities, our Urban Tree Challenge Fund partners.
- 3.27 The planting plans at Bristol Estate arose from the Bristol Estate Leaseholders & Tenants Association (BELTA) wanting to develop their estate. BELTA and CPRE Sussex have been working on the plans for some time, with a planting plan, colourful poster and 'artist's impression' designed with support from CPRE Sussex. BELTA had raised funds for phase 1 of the planting before the Forgotten Places funding was applied for. The Forgotten Places project allowed for rolling together the second phase of planting at the same time by funding an additional 10 trees. The plans have remained largely unchanged except for some species amendments to better thrive in the challenging conditions.
- 3.28 Much community engagement has taken place around this project. BELTA have advertised plans on their [website](#) and through activity days and posters in community spaces. We are now discussing a door-to-door letter for those residents most directly affected by the plans. CPRE Sussex have provided planting plans, design work and funding and have attended public events to discuss the plans and gathered some anecdotal feedback (all positive). Local Councillors have been kept up to date by email.
- 3.29 Council officers in the City Parks projects team are evaluating further ideas of how we could be involved in this initiative. One idea is looking to mobilise the Green Spaces Forum members to work in unison with the Woodland Trust to deliver a planting project similar to the Queen Victoria Jubilee planting at Westmeston. A suitable hillside site, with a prominent view, that isn't Downland species rich grassland, is required. A site at Hollingbury is currently being considered.
- 3.30 As part of The Queen's Green Canopy initiative, the National Association of Civic Officers has invited Civic Heads to plant a tree as a tribute to Her Majesty on 11th March. The Cityparks Team have identified Stanmer Park (exact location to be confirmed) as a suitable venue for planting a Jubilee tree in honour of Her Majesty and this will take place on 11th March, with the Mayor being in attendance.

Events Funding

- 3.31 A link to available funding has been added to our Platinum Jubilee web page.
- 3.32 £5,000 has been allocated to run a community grant programme to mark the occasion, offering funding for community events and activities. The fund will be available through the council's annual grant programme called the Communities Fund. Details will be published early in the new financial year.

- 3.33 There is a funding pot available through the [Arts Council](#). The Arts Development Team have been in discussions with Brilliant Brighton and Videoclub, who are programming the [Third Thursdays](#) events as part of the ABCD Cultural Recovery Plan, to submit a bid to support a Jubilee Third Thursdays event in June as part of the celebrations.

4. Analysis and consideration of alternative options

- 4.1 It is evident from the Full Council approval of the 15 July 2021 Notice of Motion that members do want the Jubilee to be appropriately celebrated, so doing nothing to commemorate the Jubilee is not an option.
- 4.2 Members could choose not to pursue one or more of the ways of celebrating the Jubilee outlined above (i.e. the Hove beacon; encouraging/facilitating community street parties; tree-planting). However, it should be noted that Full Council explicitly agreed to pursue the option of featuring the Hove beacon in celebrations.
- 4.3 Members could also choose to explore means of celebrating the Jubilee additional to those outlined above.

5. Community engagement and consultation

- 5.1 There has been considerable community engagement around the Queen's Green Canopy, Bristol Estate, planting event (see 3.14.4). As planning for the Jubilee celebrations progresses, it is anticipated that there will be extensive engagement with communities and with community sector groups across the city.

6. Conclusion

- 6.1 Members are asked to note the information included in the report.
- 6.2 The Queen's Platinum Jubilee is an important moment for the whole country and there are a variety of ways that communities across the city can and will celebrate this important occasion. Many initiatives are being promoted for both the council and local communities to get involved in, including street parties, tree planting and various other local events.

7. Financial implications

- 7.1 The cost of any events or activities planned will need to be identified and funding will need to be identified and approved. This could either be through one-off funding in year or it could be considered as part of the 2022/23 budget setting process. If any of the projects lead to ongoing maintenance costs funding for these would need to be identified too.

Name of finance officer consulted: Jeff Coates Date consulted 15/02/22

8. Legal implications

- 8.1 The closure of roads for street parties will require orders to be made under s21 of the Town Police Clauses Act 1847. It is not considered that there are any other legal implications directly arising from the report.

Name of lawyer consulted: Alice Rowland Date consulted 11/02/22

9. Equalities implications

- 9.1 Plans for the Queen's Platinum Jubilee celebrations are still progressing and, as planning develops, a key element will be to ensure that celebrations are inclusive and are accessible to every community in the city.

10. Sustainability implications

- 10.1 Planning for the Queen's Platinum Jubilee celebrations is still progressing. Plans will be developed with environmental sustainability and carbon reduction at their core. The new LED lights on Hove Beacon will require minimal carbon usage and carbon positive commemorative actions and being seen through tree planting for the Queen's Green Canopy initiative.

11. Other Implications

Crime & disorder implications:

- 11.1 The potential for crime & disorder associated with public celebrations will be considered and mitigated as part of detailed planning for Jubilee events.

Public health implications:

- 11.2 Officers planning Jubilee events will work closely with colleagues in Public Health to identify opportunities to reinforce positive behaviours and to mitigate negative behaviours.

Supporting Documentation

1. Appendices

1. Platinum Jubilee Letter



Department for Levelling Up, Housing & Communities

Rt Hon Michael Gove MP

*Secretary of State for Levelling Up, Housing
and Communities*

Minister for Intergovernmental Relations

**Department for Levelling Up, Housing and
Communities**

4th Floor, Fry Building
2 Marsham Street
London SW1P 4DF

To: All local authorities in the United Kingdom

6 January 2022

HER MAJESTY THE QUEEN'S PLATINUM JUBILEE

In 2022, Her Majesty The Queen will become the first British Monarch to celebrate a Platinum Jubilee. To mark The Queen's historic 70-year reign, 2022 will see Platinum Jubilee celebrations throughout the UK and the Commonwealth as part of a year-long programme of events.

We want celebrations to be even bigger and better than previous national celebrations and for as many people as possible across the nation to participate, at any point from January to December 2022. You'll be aware that an announcement was made to extend the bank holiday weekend from Thursday 2 to Sunday 5 June 2022 to provide opportunities for communities throughout the UK to come together to celebrate this historic milestone.

We know that you and partnering organisations you work with understand your communities best and will support them to participate in celebrations. We also know you will want to make sure that this momentous occasion is marked fittingly, and many of you have already started planning exciting programmes of events for your local areas. To support your preparations, we wanted to highlight some of the opportunities for councils and your communities to engage with the Platinum Jubilee which are listed below:

- **Street Parties and 'The Big Jubilee Lunch'**
 - Street parties should be encouraged, and you can play an important role in supporting residents who want to organise parties for their neighbours. For example, relaxing road closure rules to enable street parties to take place as easily as possible will be important. Updated street parties' guidance on how to organise a street party can be found [here](#).
- **The Big Jubilee Lunch – 2 to 5 June 2022**
 - The Big Jubilee Lunch encourages communities to come together, celebrate their connections and get to know each other a little bit better and will bring the Jubilee celebrations into the heart of every community. More details can be found [here](#).
- **Beacon Lighting**
 - In keeping with the long tradition of celebrating Royal Jubilees, Weddings and Coronations, councils are encouraged to light beacons across the UK in the evening of 2 June 2022. Should you wish to take part, more information can be found in the specific Beacons website which can be found [here](#).
- **Platinum Jubilee Events/projects organised by Local Authority-owned civic amenities**
 - Libraries, museums, leisure centres, heritage sites etc are welcome to host their own individual events and projects to mark the Platinum Jubilee. For example, this could include exhibitions, concerts or special talks.

- **National Lottery Funding**
 - More than £22 million of National Lottery funding is being made available to help communities across the country come together to celebrate the Platinum Jubilee. More information on the different funds available can be found [here](#).
- **The Platinum Jubilee Emblem**
 - The official Platinum Jubilee Emblem is available for use for all activities associated with the Platinum Jubilee celebrations, including community and national events. It is free to download [from the Royal website](#), where detailed usage guidance can also be found.
- **The Queen's Green Canopy**
 - Everyone from individuals to community groups, villages, cities, counties, schools and corporations are encouraged to plant a tree for the Jubilee. The initiative runs from October 2021, when the tree planting season began, through to the end of the Jubilee year in 2022. More details can be found [here](#).
- **City Status Competition**
 - The Civic Honours competition launched on 8 June. These rare awards will grant winning towns and cities 'city status' and 'Lord Mayor or Provost status'. More details can be found [here](#).
- **Council led events**
 - Councils are welcome to organise and facilitate large scale Platinum Jubilee events and celebrations of their own choosing within their towns and cities, which could include their own civic occasion, for example, "The Mayor's Jubilee Party".
- **Local pageants**
 - Further guidance on how to host a local pageant will be available early in 2022.
- **Broadcast the TV feed.**
 - The use of local large screens in public places to show TV coverage of the Jubilee, which could include The Platinum Party at the Palace. These screenings could be complemented or enhanced by being a part of a wider event.

The Department for Digital, Culture, Media and Sport (DCMS) have launched a Platinum Jubilee website which includes useful related resources. The website includes an interactive map, for people and organisations to contribute to and others to search for information on activities taking place near to them. Please explore the website and submit events and activities to be included on the map, which can be found [here](#).

We look forward to seeing the exciting and creative ways in which you and your communities choose to mark the Queen's Platinum Jubilee.

With every good wish,



Rt Hon Michael Gove MP
Secretary of State for Levelling Up, Housing and Communities
and Minister for Intergovernmental Relations