

Strategy, Finance & City Regeneration Committee

Date: **25 January 2024**

Time: **4.00pm**

Venue: **Council Chamber, Hove Town Hall**

Members: **Councillors:** Sankey (Chair), Taylor (Deputy Chair), Shanks (Opposition Spokesperson), Cattell, McNair, Muten, Pumm, Robins, Rowkins and Williams

Contact: **Anthony Soyinka**
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Date of Publication - Wednesday, 17 January 2024

AGENDA

Part One

Page

82 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.

83 MINUTES

To consider the minutes of the meeting held on 7 December 2023.

Contact Officer: John Peel

Tel: 01273 291058

84 CHAIR'S COMMUNICATIONS

85 CALL OVER

- (a) Items (88 - 92) 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.

86 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;
- (b) **Written Questions:** to receive any questions submitted by the due date of 12 noon on the (insert date);
- (c) **Deputations:** to receive any deputations submitted by the due date of 12 noon on the (insert date).

87 MEMBER INVOLVEMENT

7 - 8

To consider the following matters raised by councillors:

- (a) **Petitions:** to receive any petitions;
- (b) **Written Questions:** to consider any written questions;
- (c) **Letters:** to consider any letters;
- (d) **Notices of Motion:** to consider any Notices of Motion referred from Council or submitted directly to the Committee.

88 FULL REVIEW OF POLLING DISTRICTS & POLLING PLACES 2023/24

9 - 110

Contact Officer: Michael Appleford Tel: 01273 291997
Ward Affected: All Wards

89 NEW SWIMMING POOL AT WITHDEAN SPORTS COMPLEX

111 - 130

Contact Officer: Kerry Taylor Tel: 01273 292707
Ward Affected: Westdene & Hove Park

90 CITY CLEAN INDEPENDENT INQUIRY

131 - 160

Contact Officer: Alison Mcmanamon Tel: 01273 290511

91 COUNCIL TAX BASE AND BUSINESS RATES RETENTION FORECASTS 2024/25

161 - 172

Contact Officer: Heather Bentley Tel: 01273 291244
Ward Affected: All Wards

92 COUNCIL TAX PREMIUMS ON SECOND HOMES

173 - 188

Contact Officer: Annie Brown

Ward Affected: All Wards

PART TWO

93 PART TWO PROCEEDINGS

To consider whether the items listed in Part Two of the agenda and decisions thereon should remain exempt from disclosure to the press and public.

94 ITEMS REFERRED FOR FULL COUNCIL

To consider items to be submitted to the 1 February 2024 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

The City Council actively welcomes members of the public and the press to attend its meetings and holds as many of its meetings as possible in public. Provision is also made on the agendas for public questions to committees and details of how questions can be raised can be found on the website and/or on agendas for the meetings.

The closing date for receipt of public questions and deputations for the next meeting is 12 noon on the fourth working day before the meeting.

Meeting papers can be provided, on request, in large print, in Braille, on audio tape or on disc, or translated into any other language as requested.

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Further information

For further details and general enquiries about this meeting contact Anthony Soyinka, (01273 291006, email anthony.soyinka@brighton-hove.gov.uk) or email democratic.services@brighton-hove.gov.uk

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- Do not stop to collect personal belongings;
- Once you are outside, please do not wait immediately next to the building, but move some distance away and await further instructions; and
- Do not re-enter the building until told that it is safe to do so

Brighton & Hove City Council

Strategy Finance and City Regeneration Committee

Agenda Item 87

Subject: Member Questions

Date of meeting: 25 January 2024

The question will be answered without discussion. The person who asked the question may ask one relevant supplementary question, which shall be put and answered without discussion. The person to whom a question, or supplementary question, has been put may decline to answer it.

The following written questions have been received from Members:

(1) Councillor Shanks

In view of the eight-month delay in progressing with phase three of the Valley Gardens project - which had already undergone a full public consultation and was ready to move to tender - could you outline any additional cost in officer time resulting from the re-visiting of those plans and any additional consultation, and the subsequent impact on the budget of the inevitable increase in contractor fees and cost of materials due to inflation during that delay?

Brighton & Hove City Council

Strategy, Finance and City Regeneration Committee

Agenda Item 88

Subject: Full Review of Polling Places 2023/24

Date of meeting: 25 January 2024

Report of: Executive Director for Governance, People & Resources

Contact Officer: Name: Michael Appleford, Head of Electoral Services &
Local Land Charges
Tel: 01273 2997
Email: michael.appleford@brighton-hove.gov.uk

Ward(s) affected: All

For general release

1. Purpose of the report and policy context

- 1.1 This report deals with the statutory review of all polling places within Brighton & Hove. The Council is required undertake a full review of all polling districts and polling places within the period of 16 months that starts on 1 October of every fifth year after 1 October 2013.
- 1.2 Due to the South Portslade by-election and Neighbourhood Plan Referendums taking place early this year, the polling district scheme was confirmed by an urgent decision taken by the Chief Executive under the Scheme of Delegation to Officers Paragraph 7(2).
- 1.3 A significant review took place in 2022 following the Local Government Boundary Commission for England's Review of the city's wards. The review of polling places set out in this report predominately reconfirms the 2022 scheme - making changes only when necessary.
- 1.4 A consultation on proposed changes took place between 1 and 31 October 2023. Respondents were invited to provide comments and alternatives.

2. Recommendations

- 2.1 That Committee agrees the polling place scheme outlined in Appendix 3.
- 2.2 That Committee delegates authority to the Executive Director for Governance, People & Resources to take all measures as are necessary or incidental, as required by law, to implement the changes indicated in para 2.1.
- 2.3 That Committee delegates authority to the Returning Officer to designate alternative polling places, in the event of any polling place being unavailable, at any poll taking place prior before the next full review of polling places,

subject to Group Leaders and respective ward Councillors being consulted prior to any changes being confirmed.

3. Context and background information

- 3.1 Under the Representation of the People Act 1983, the Council has a duty to divide its area into polling districts and to designate a polling place for each district for UK Parliamentary elections. It must keep these arrangements under review and undertake a full review of all polling districts and polling places within the period of 16 months that starts on 1 October of every fifth year after 1 October 2013.
- 3.2 The (Acting) Returning Officer is responsible for administering parliamentary elections. At Brighton & Hove this is the Chief Executive. The (Acting) Returning Officer must be consulted and comment on polling district and polling place reviews.
- 3.3 The Boundary Commission for England (BCE) completed their review of parliamentary constituencies in July 2023. This review split a polling district in Hanover & Elm Grove ward between Brighton Pavilion and Brighton Kemptown & Peacehaven constituencies. The new polling district scheme must allow for parliamentary elections to take place on the current constituency boundaries until the next general election - when the new boundaries will be used.
- 3.4 Design principles, like those followed in 2022, were used when reviewing the scheme. These are:
 - assign a polling place to each polling district and elector
 - ensure polling places are nearby to electors and located close to public transport routes and local amenities, so far as is reasonable and practicable
 - ensure every polling place has step free access or can be provided with a ramp, so far as is reasonable and practicable
 - help facilitate the safe and efficient administration and delivery of local and parliamentary elections
 - have a high proportion of double/triple stations - this will enable polling places to benefit from a higher proportion of senior staff who can resolve issues.
 - ensure most polling stations have between 1,250 to 1,750 polling station electors - this will ensure that polling stations are not too busy or quiet, staffing resources are best utilised and Electoral Commission ratios do not require further polling station splits.
 - where possible, limit the use of schools
 - avoid the use of temporary buildings
 - implement the BCE parliamentary boundary changes

4. Analysis and consideration of alternative options

- 4.1 The (Acting) Returning Officer and their staff reviewed all polling places – assessing their location within the district and step free access. Comments on the current venues were also requested from polling staff and the relevant ward members. Visits were undertaken to potential venues to assess their suitability.
- 4.2 A scheme and consultation document were published (see Appendix 1) and consulted on during October. Appendix 2 provides all the responses received during the consultation and the (Acting) Returning Officer's comments on these.
- 4.3 103 consultation responses were received regarding the use of Elm Grove Primary School as a polling place. Across the responses several alternative sites were suggested. The alternatives were not suitable for a range of reasons including: being unavailable, converted into flats, already at the maximum capacity of electors or in an unsuitable and/or inaccessible location.
- 4.4 In line with the design principles, the Returning Officer has significantly limited the use of schools as polling places with schools only used when a suitable alternative is unavailable. Due to the scale of consultation responses received in opposition to the use of Elm Grove Primary School, an alternative space in Wellington House has been identified. This will require either Families, Children & Learning and NHS staff to be relocated and a space cleared or for the Council to enable statutory provision to service users at a different location. Returning Officer staff are finalising these arrangements to determine the least disruptive option. Wellington House has a significant slope at the egress that may need to be used. This has some impact on accessibility however, this will be mitigated by Returning Officer staff providing proactive customer service.
- 4.5 During the consultation, the Returning Officer was made aware that St Richard's Church Hall, Mountfields was no longer available. Following consultation with ward Councillors this has been replaced in the scheme by Hollingdean Community Centre, Thompson Road.
- 4.6 National election expenses are retrospectively reimbursed by the Election Claims Unit (ECU) of the Department of Levelling Up, Housing and Communities. Guidance to Returning Officers states they must seek best value. A failure to use available public buildings, which legislation allows for, and are already funded from the Consolidated Fund, may result in the Council having to cover costs incurred..

5. Community engagement and consultation

- 5.1 The consultation period for this review ran from 1 to 31 October 2023. Public notice of the review was given, and information about the review was made available on the Council's website and on the Council's consultation portal.

Electors residing in the Brighton Kemptown, Brighton Pavilion and Hove constituencies were invited to make representations. Hard copies of the consultation document were available on request.

- 5.2 The consultation paper, together with maps of each ward showing the polling district boundaries, can still be viewed on the Council's website at: [2023 Full Review of Brighton & Hove Polling Districts and Places Consultation Paper and \(Acting\) Returning Officer Comment \(brighton-hove.gov.uk\)](https://www.brighton-hove.gov.uk/2023-Full-Review-of-Brighton-&-Hove-Polling-Districts-and-Places-Consultation-Paper-and-(Acting)-Returning-Officer-Comment)
- 5.3 Ward Councillors, Members of Parliament, local political parties and a significant number of Equalities, Diversity and Inclusion groups were sent the consultation documents for feedback.
- 5.4 108 comments were received in response to the consultation. These are summarised in Appendix 2 along with responses from the (Acting) Returning Officer.

6. Conclusion

- 6.1 The Council is required to designate suitable polling places which satisfy the (Acting) Returning Officer's requirements. The proposed changes provide more than satisfactory arrangements. Approval of these changes will allow the Returning Officer to continue their preparations for Police and Crime Commissioner election in May 2024 and the unscheduled general election which will take place by 28 January 2025.

7. Financial implications

- 7.1 There are no material financial implications arising from the report. Any costs arising from the review are expected to be met within existing resources.
- 7.2 However, it should be noted that national elections expenses are retrospectively reimbursed by the ECU. The Returning Officer will therefore need to demonstrate best value and should the ECU then the Council may need to cover some of the costs incurred.

Name of finance officer consulted: Ishemupenyu Chagonda Date consulted: 11/01/24

8. Legal implications

- 8.1 Under sections 18A to 18E of the Representation of the People Act 1983 as amended by the Electoral Registration Act 2006, local councils are required to keep the designation of polling places as well as polling districts under review. In doing so they must act so as to give all electors in their area such reasonable facilities for voting as are practicable in the circumstances.

- 8.2 The Strategy, Finance & City Regeneration Committee is the Council body with delegated authority to exercise the Council's functions in relation to electoral matters.

Name of lawyer consulted: Elizabeth Culbert Date consulted 12/01/24

9. Equalities implications

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

10. Sustainability implications

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

Supporting Documentation

1. Appendices

1. Full Review of Brighton & Hove Polling Districts and Places Consultation Paper and (Acting) Returning Officer Comment
2. Responses to the Full Review of Brighton & Hove Polling Districts and Places Consultation Paper and (Acting) Returning Officer Comment
3. Final Scheme of Polling Places

Full Review of Brighton & Hove Polling Districts and Places

Consultation Paper and (Acting) Returning Officer Comment

1. Introduction & Strategy

Brighton & Hove City Council are conducting a full review of its polling districts and polling places under Section 18 of the Representation of the People Act 1983 and in line with the Electoral Registration and Administration Act 2013.

This review is necessary due to:

- The statutory requirement for a review to be started and completed within the period of 16 months from 1 October every fifth year after 1 October 2013.
- The requirement to implement the changes to parliamentary boundaries in Brighton & Hove following the Boundary Commission for England (BCE) Review which completed in July 2023. This review split a polling district in Hanover & Elm Grove ward between Brighton Pavilion and Brighton Kemptown & Peacehaven constituencies respectively.

A significant review took place in 2022 following the Local Government Boundary Commission for England's Review of the city's wards - and the passing of the Elections Act 2022. This Act brought about changes including the introduction of Voter ID. This review will largely confirm the scheme devised in 2022 – making changes only where necessary.

The proposed scheme will follow similar design principles to 2022. These are:

- Assign a polling place to each polling district and elector
- So far as is reasonable and practicable, ensure polling places are nearby to electors and located close to public transport routes and local amenities.
- So far as is reasonable and practicable ensure every polling place has step free access or can be provided with a ramp
- Help facilitate the safe and efficient administration and delivery of local and parliamentary elections
- Have a high proportion of double/triple stations. This will enable polling places to benefit from a higher proportion of senior staff who can resolve issues.
- Ensure most polling stations have between 1,250-1,750 polling station electors. This will ensure that polling stations are not too busy or quiet, staffing resources are best utilised and Electoral Commission ratios do not require further polling station splits.
- Where possible, limit the use of schools
- Avoid the use of temporary buildings
- Implement the BCE parliamentary boundary changes

The Council and Returning Officer would like to use this opportunity, to highlight their appreciation for the continued co-operation of polling places in providing their buildings for the day so that electors have a convenient place to vote.

2. The Review and Decision-Making Process

The Council has published notice of holding the review and consulted the (Acting) Returning Officer for each Parliamentary Constituency in the Council's area. The (Acting) Returning Officer has commented on the proposals throughout. An interactive map of the proposals can be viewed [here](#).

The Council then invites comments on the proposals. The consultation paper will be published on the Council's website. It will also be sent to Councillors, Members of Parliament, local political parties, and local people and stakeholders with expertise in disability and accessibility.

All representations will be considered and responded to by the (Acting) Returning Officer. They will be published in the final report by the (Acting) Returning Officer with their final recommendations. The Strategy, Finance & Regeneration Committee will consider the proposals and make a final decision on 7 December. The agreed polling districts will then be passed to the Electoral Registration Officer for publication in the revised Register of Electors. This register will be published on 2 January 2024.

3. The Review Timetable

The timetable for the review is set out below:

- Publication of notice of review, and consultation document including (Acting) Returning Officer's proposals – Monday 2 October
- Closing date for representations - Tuesday 31 October
- Final proposal published via Agenda papers and website – Wednesday 29 November
- Council Strategy, Finance & City Regeneration Committee meeting – approval of scheme - Thursday 7 December
- Revised Register Published – Tuesday 2 January
- Police & Crime Commissioner Election – Thursday 2 May
- General Election – No later than Tuesday 28 January 2025

4. Commenting on the Proposals

The Council and (Acting) Returning Officer welcome your thoughts on our proposals. When making comments or alternative proposals, please consider the principles that we have used to develop the scheme:

- Assign a polling place to each polling district and elector
- So far as is reasonable and practicable, ensure polling places are nearby to electors and located close to public transport routes and local amenities.
- So far as is reasonable and practicable ensure every polling place has step free access or can be provided with a ramp
- Help facilitate the safe and efficient administration and delivery of local and parliamentary elections
- Have a high proportion of double/triple stations. This will enable polling places to benefit from a higher proportion of senior staff who can resolve issues.
- Ensure most polling stations have between 1,250-1,750 polling station electors. This will ensure that polling stations are not too busy or quiet, staffing resources are best utilised and Electoral Commission ratios do not require further polling station splits.
- Where possible, limit the use of schools

- Avoid the use of temporary buildings
- Implement the BCE parliamentary boundary changes

You can respond to the review in several ways:

- Online at our consultation portal
- by email to electors@brighton-hove.gov.uk
- by post to: The Returning Officer, Hove Town Hall, Norton Road, Hove BN3 3BQ

We must receive your views by 31 October 2023 for them to be considered in this review

Brunswick & Adelaide, Hove

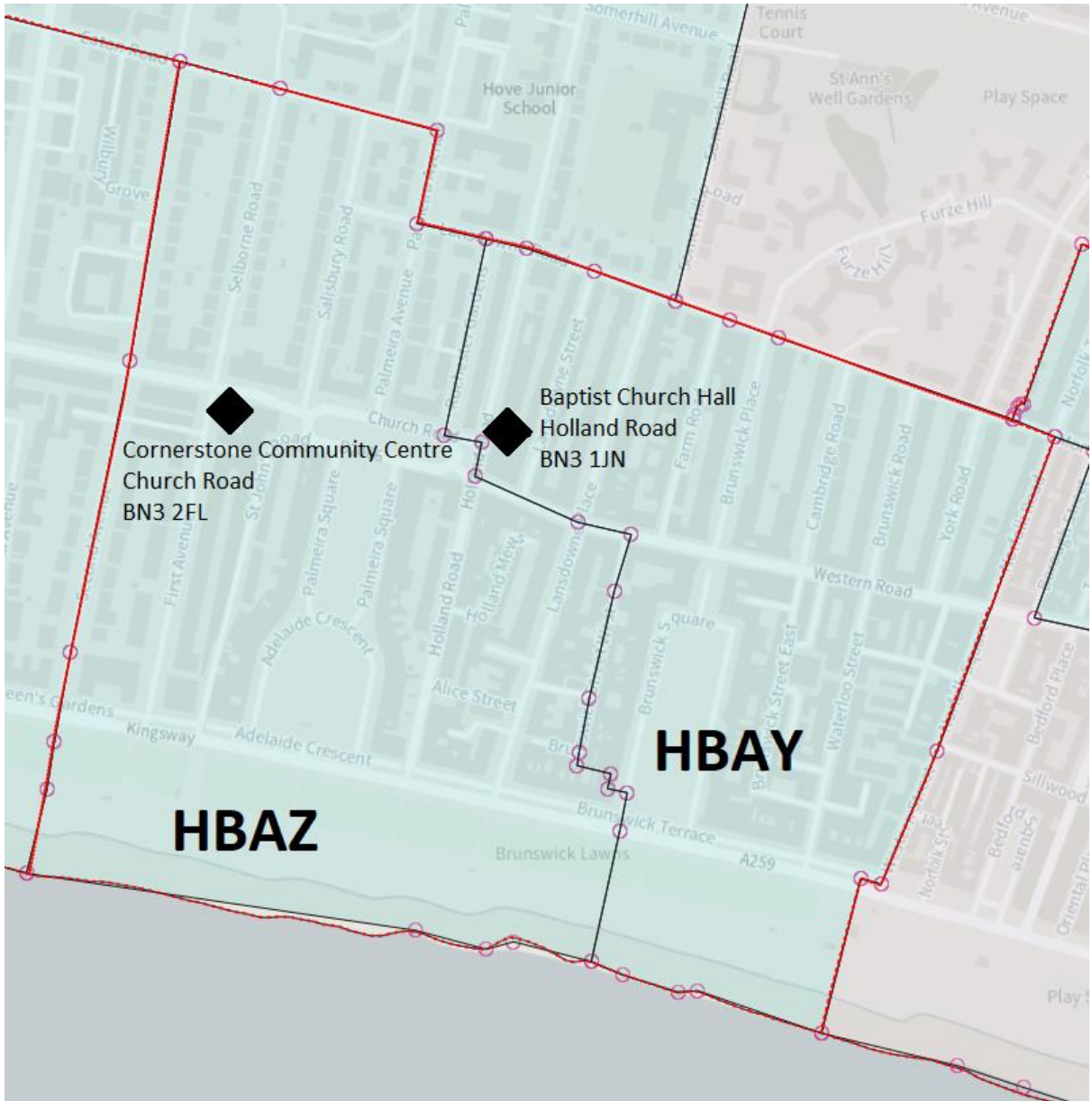
At the 2022 review, Cornerstone Community Centre was removed from the scheme and the ward was split into two polling districts. Each district had a double polling station. St Patricks Riverside was the polling place for the east of the ward with Holland Road Baptist Church covering the west.

Unfortunately, the stairlift is no longer operational at St Patrick's Riverside and with steep steps at the entrance the (Acting) Returning Officer no longer deems the venue accessible and therefore now unsuitable for polling.

There are no other suitable venues in the east of the ward.

It is therefore proposed that electors in the eastern polling district (HBAY) now vote at Holland Road Baptist Church while electors in the west (HBAZ) vote in Cornerstone Community Centre.

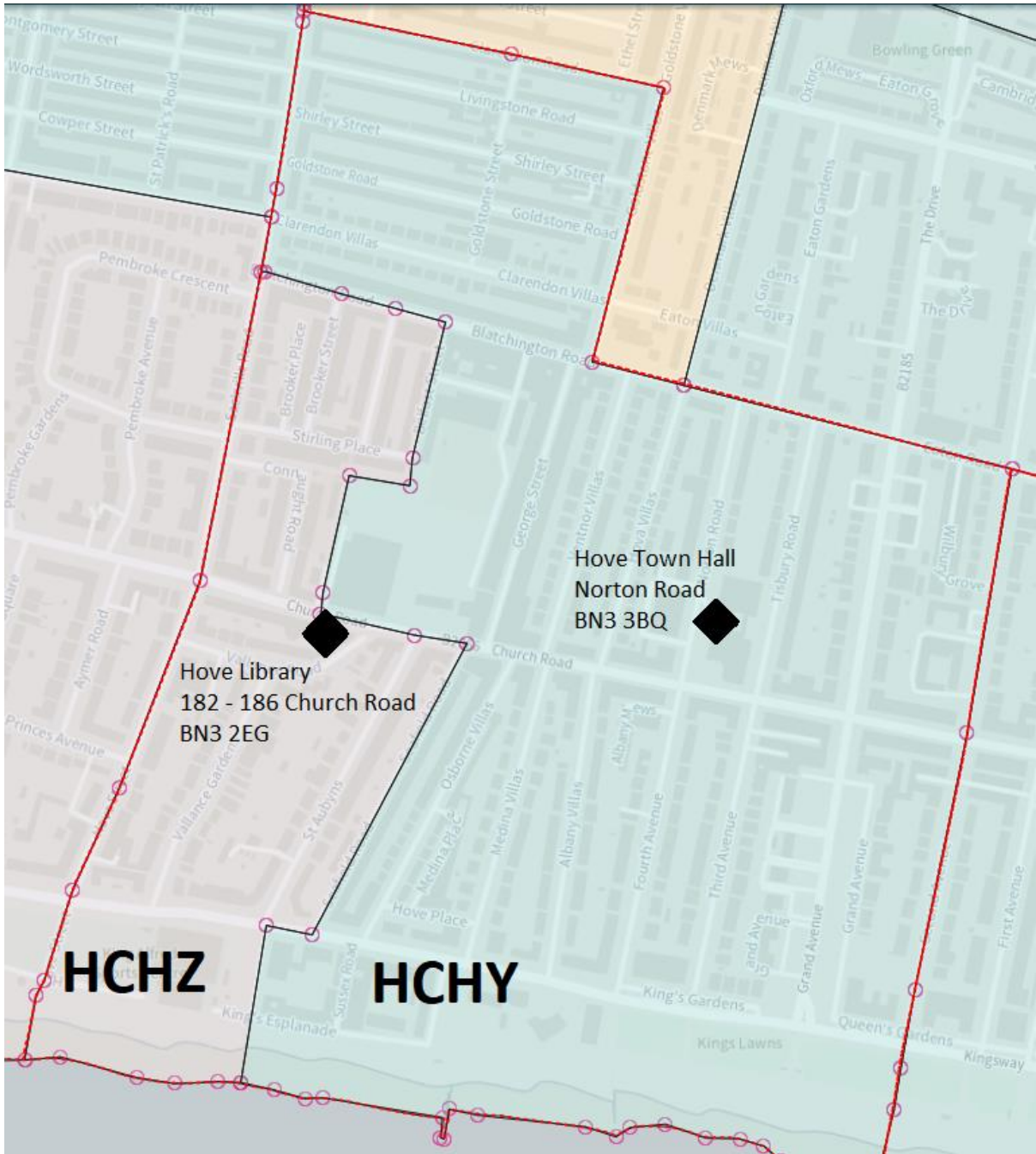
Constituency	Polling District	Polling District Electorate	Polling Place Electorate	Polling Place	Number of Polling Stations
Hove	HBAY	4076	3698	Baptist Church Hall, Holland Road, BN3 1JN	2
Hove	HBAZ	3355	2987	Cornerstone Community Centre, Church Road, BN3 2FL	2



Central Hove, Hove

The 2022 scheme worked well at the local elections. Both venues are well located and accessible. Therefore, no changes are proposed.

Constituency	Polling District	Polling District Electorate	Polling Place Electorate	Polling Place	Number of Polling Stations
Hove	HCHY	6630	5746	Hove Town Hall, Norton Road, BN3 3BQ	3
Hove	HCHZ	1604	1434	Hove Library, 182 - 186 Church Road, BN3 2EG	1

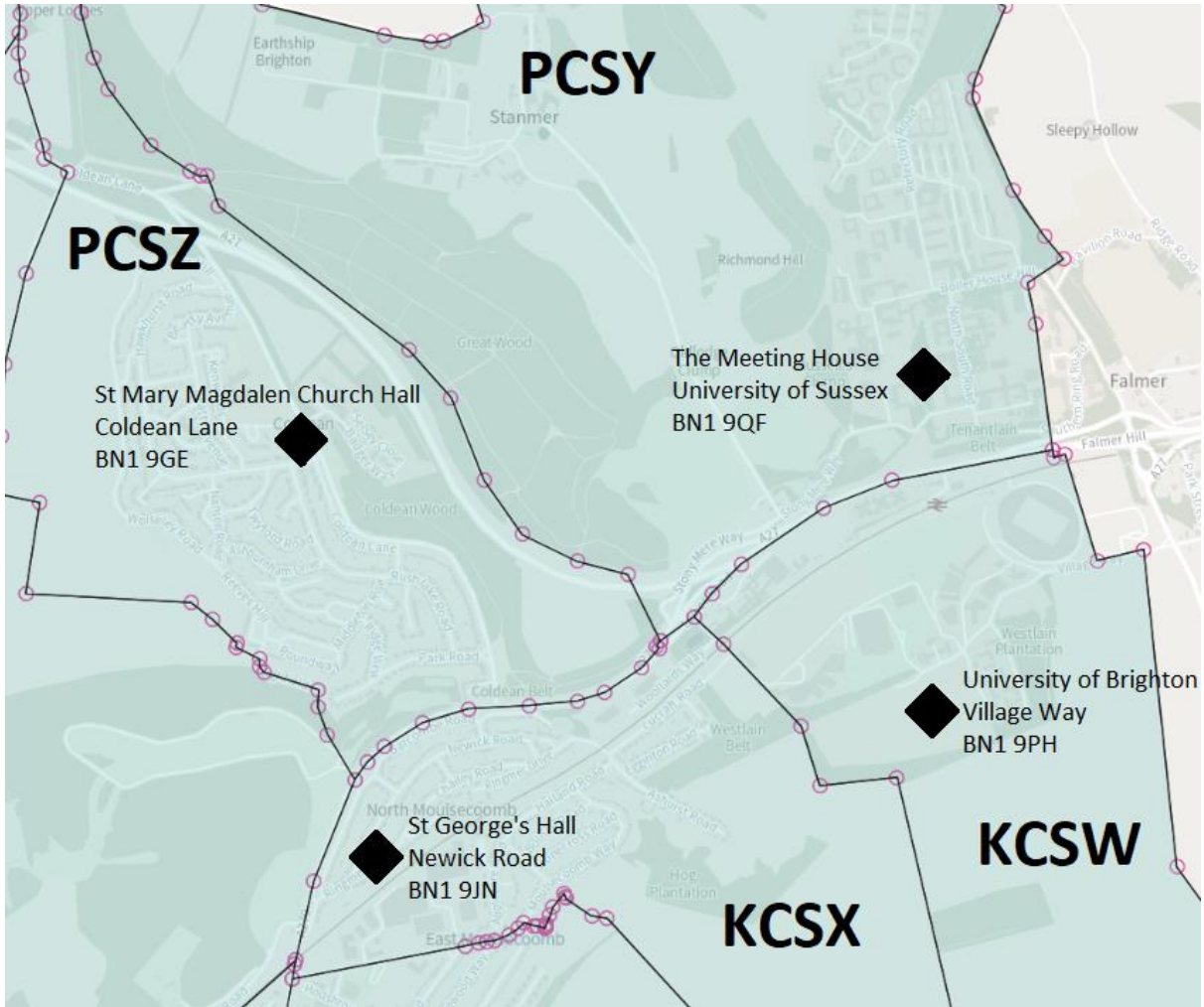


Coldean & Stanmer, Brighton Pavilion & Brighton Kemptown

The 2022 scheme worked well at the local elections. All venues are well located and accessible.

The only change proposed is to designate the whole of Brighton University's Falmer campus as the polling place for KCSW. This will allow the Returning Officer to use a different space within the complex should the Sports Pavilion be unavailable.

Constituency	Polling District	Polling District Electorate	Polling Place Electorate	Polling Place	Number of Polling Stations
Kemptown	KCSW	417	412	University of Brighton, Falmer Campus, BN1 9PH	1
Kemptown	KCSX	1984	1803	St George's Hall, Newick Road, BN1 9JN	1
Pavilion	PCSY	1873	1859	The Meeting House, Sussex University, BN1 9QN	1
Pavilion	PCSZ	2205	1902	St Mary Magdalen Church Hall, Coldean Lane, BN1 9GE	1



Goldsmid, Hove

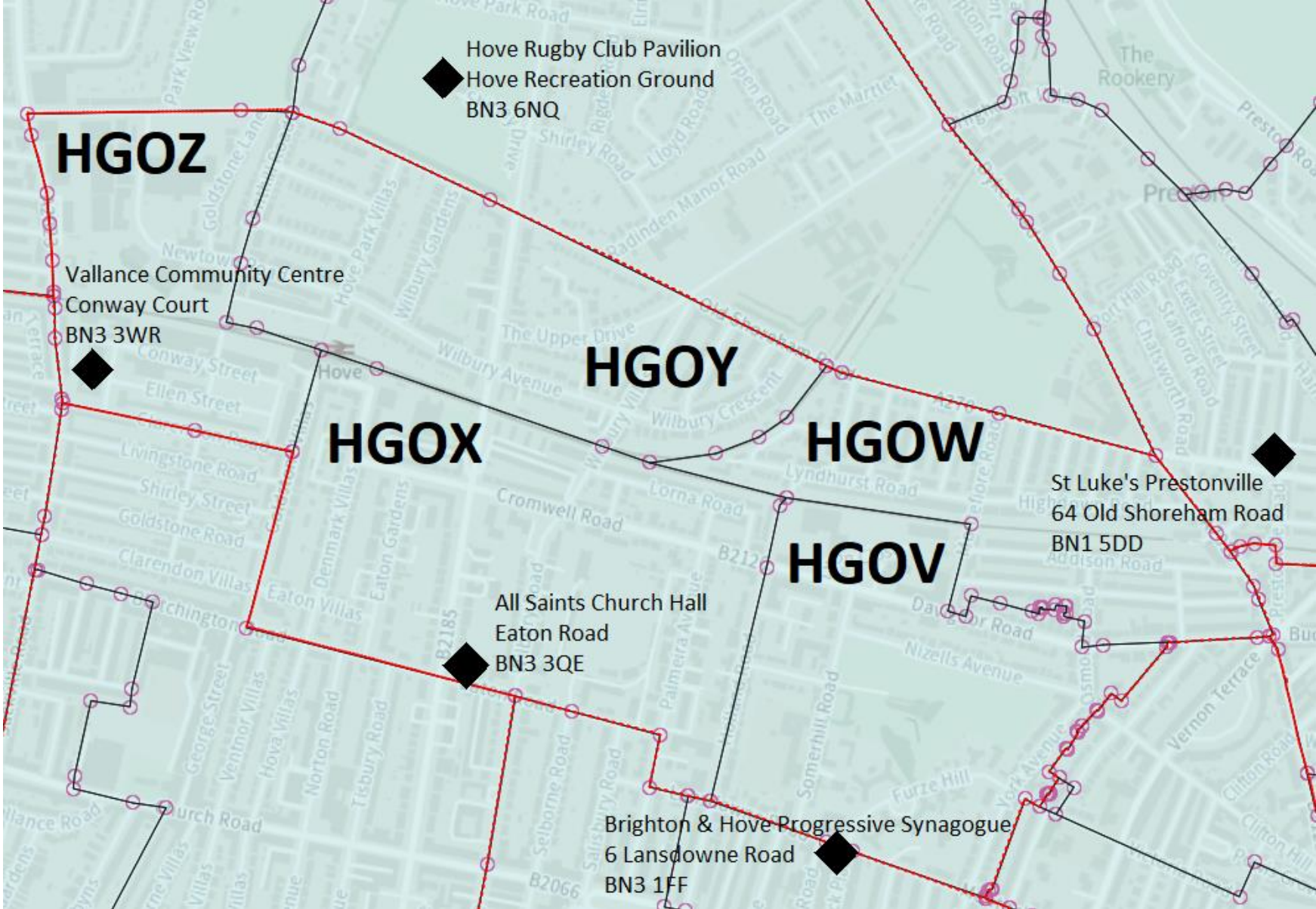
The 2022 scheme worked well at the local elections. All venues were well located and accessible.

Unfortunately, Possability Place is currently unavailable for polling. Therefore voters in a revised HGOV will vote at the Progressive Synagogue, Lansdowne Road which is situated on the Brunswick & Adelaide side of the ward boundary.

The borders of HGOX and HGOZ will also be revised to allow for a better allocation of elector numbers and for the expected increase in electorate from the developments at Sackville Road and Ellen Street.

To further increase accessibility at Hove Rugby Club Pavilion – a security guard will be present, at the Shirley Drive gate, to assist electors who may need to drive closer to the venue on the internal path.

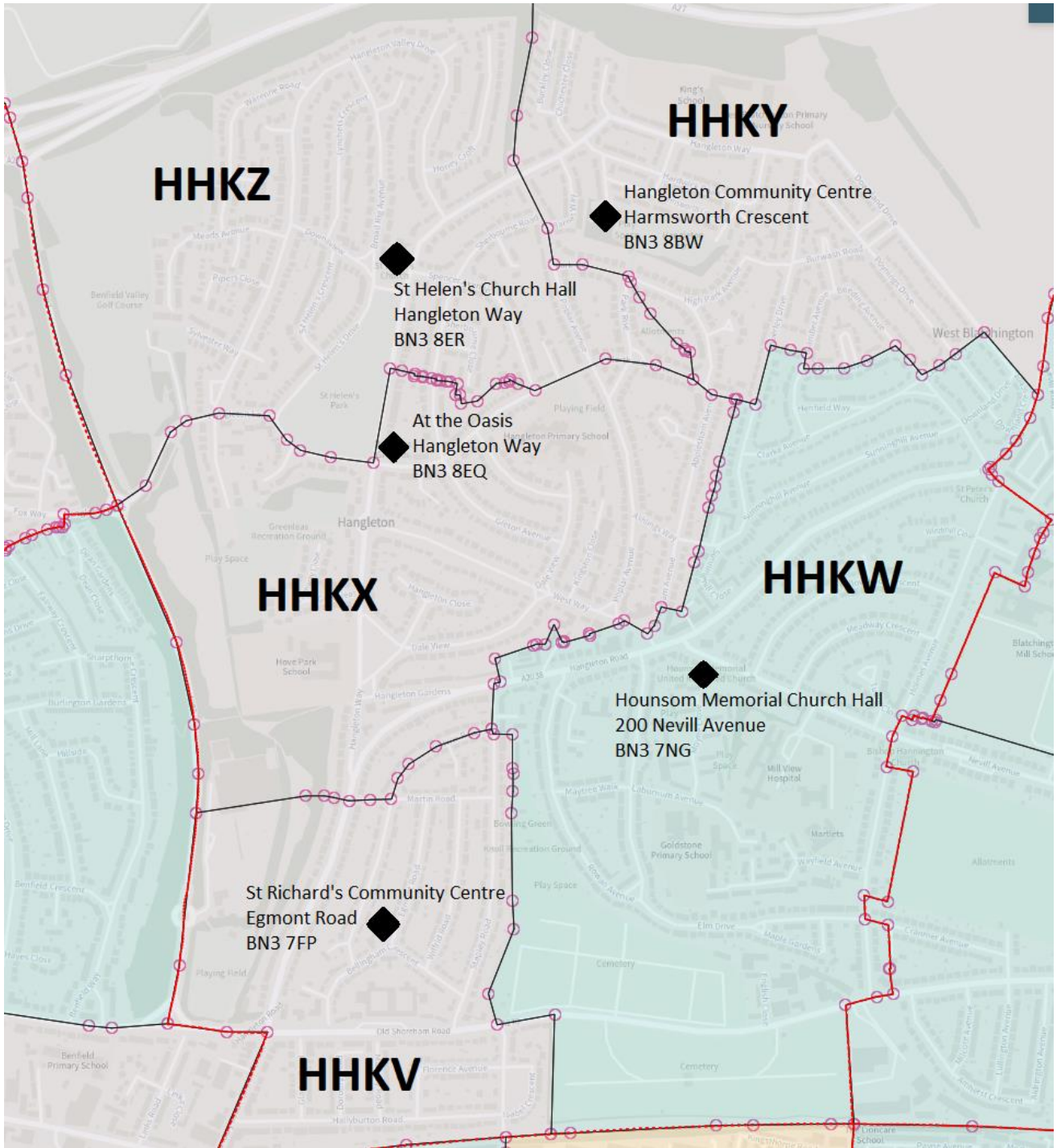
Constituency	Polling District	Polling District Electorate	Polling Place Electorate	Polling Place	Number of Polling Stations
Hove	HGOV	2075	1707	Brighton & Hove Progressive Synagogue, 6 Lansdowne Road, BN3 1FF	1
Hove	HGOW	2070	1790	St Luke`s Prestonville, 64 Old Shoreham Road, BN1 5DD	1
Hove	HGOX	3722	3159	All Saints Church Hall, All Saints Church, Eaton Road, BN3 3QE	2
Hove	HGOY	1980	1623	Hove Rugby Club Pavilion, Hove Recreation Ground, Shirley Drive, BN3 6NQ	1
Hove	HGOZ	680	548	Vallance Community Centre, Conway Court, Sackville Road, BN3 3WR	1



Hangleton & Knoll, Hove

The 2022 scheme worked well at the local elections. All venues are well located and accessible. Therefore, no changes are proposed.

Constituency	Polling District	Polling District Electorate	Polling Place Electorate	Polling Place	Number of Polling Stations
Hove	HHKV	1943	1597	St Richard's Community Centre, Egmont Road, BN3 7FP	1
Hove	HHKW	3415	2767	Hounsom Memorial Church Hall, 200 Nevil Avenue, BN3 7NG	2
Hove	HHKX	1923	1517	At The Oasis, Hangleton Way, BN3 8EQ	1
Hove	HHKY	1904	1564	Hangleton Community Centre, Harmsworth Crescent, BN3 8BW	1
Hove	HHKZ	1742	1357	St Helen's Church Hall, Hangleton Way, BN3 8ER	1



Hanover & Elm Grove, Brighton Pavilion [and Brighton Kemptown & Peacehaven]

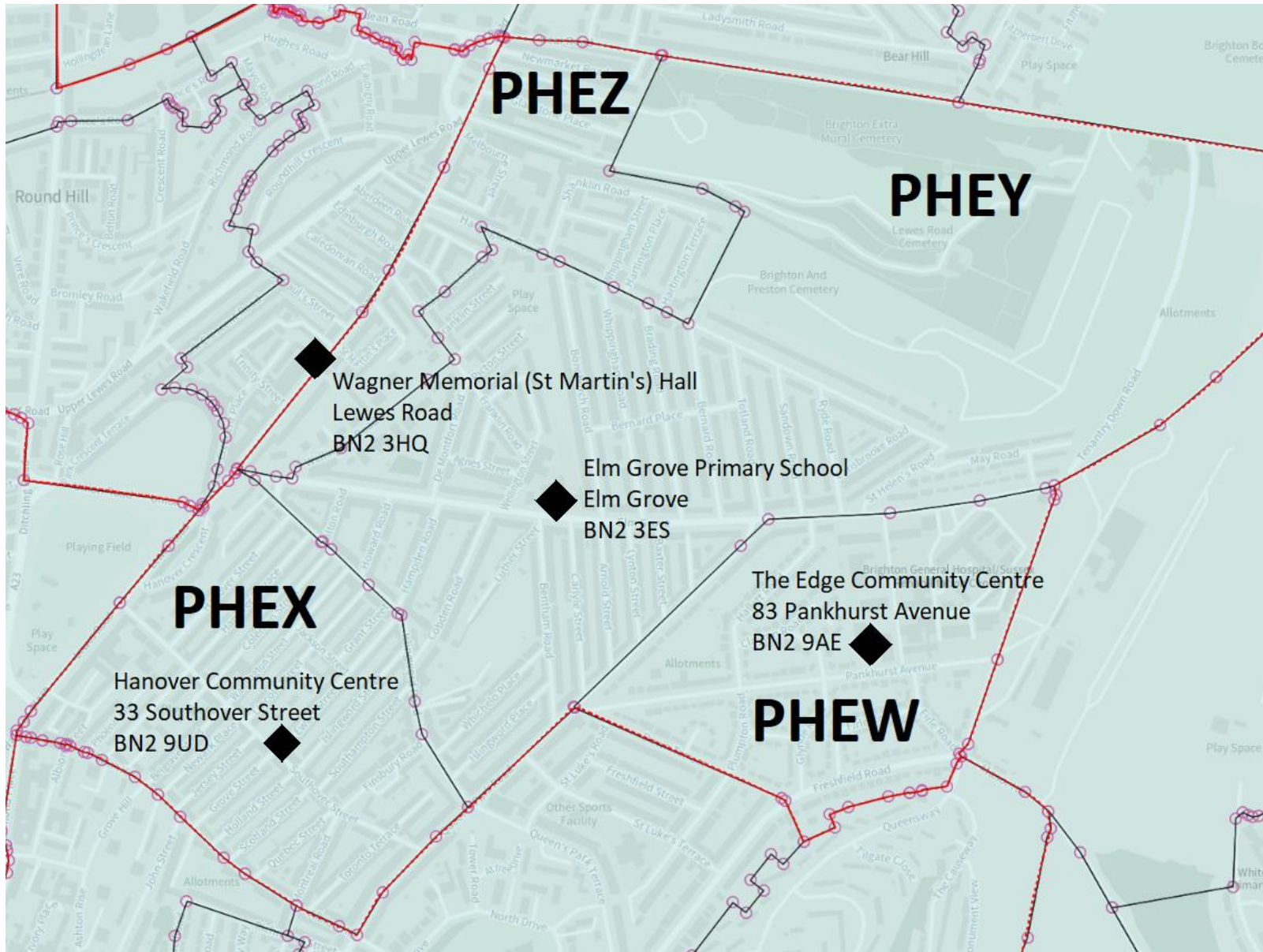
The 2022 scheme was not completely successful with Wellington House proving to be a challenging venue for polling. In addition, the unavailability of Milton Road Hall and parliamentary boundary changes require significant change to the boundaries of Hanover & Elm Grove polling districts.

Due to the circumstances around Wellington House and Milton Road Hall, a new PHEY polling district encompassing the Elm Grove area has been drawn. All electors in this area will vote at Elm Grove Primary School. This is required due to a complete lack of any viable alternatives.

The PHEW/KHEW polling district has been reduced in size to align with the final recommendations by the BCE. Electors will vote at The Edge Community Centre. The polling district will be part of Brighton Pavilion until the general election is called and it becomes part of Brighton Kemptown & Peacehaven.

The PHEX district that covers the Hanover area has been redrawn to bring all roads in Hanover under the same polling place – Hanover Community Centre.

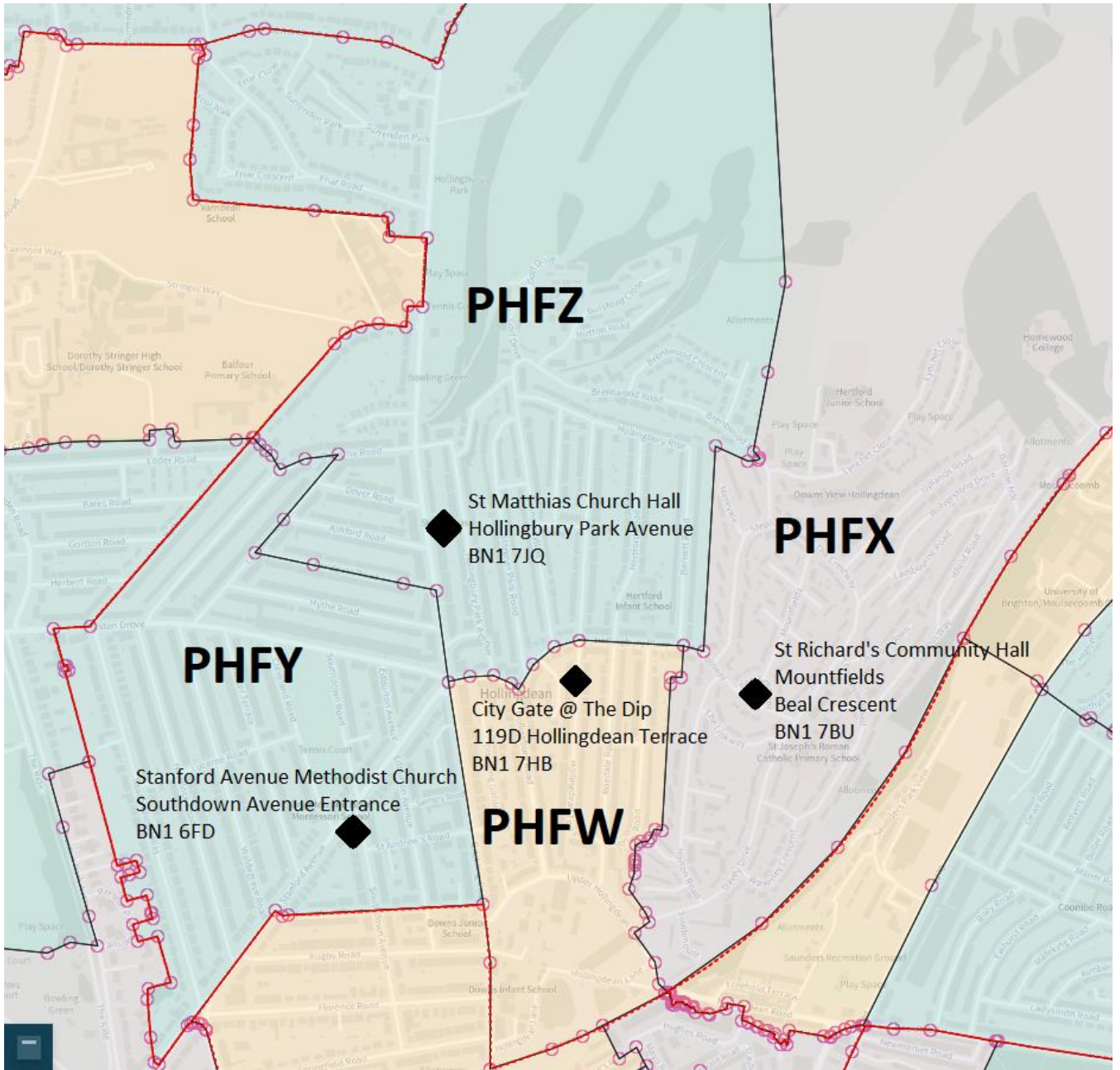
Constituency	Polling District	Polling District Electorate	Polling Place Electorate	Polling Place	Number of Polling Stations
Pavilion (Kemptown & Peacehaven at next general election)	PHEW	1077	927	The Edge Community Centre, 83 Pankhurst Avenue, BN2 9AE	1
Pavilion	PHEX	3469	3141	Hanover Community Centre, 33 Southover Street, BN2 9UD	2
Pavilion	PHEY	4839	4390	Elm Grove Primary School, Elm Grove, BN2 3ES	3
Pavilion	PHEZ	1815	1683	Wagner Memorial (St Martin`s) Hall, Lewes Road, BN2 3HQ	1



Hollingdean & Fiveways, Brighton Pavilion

The 2022 scheme worked well at the local elections. All venues are well located and accessible. Therefore, no changes are proposed.

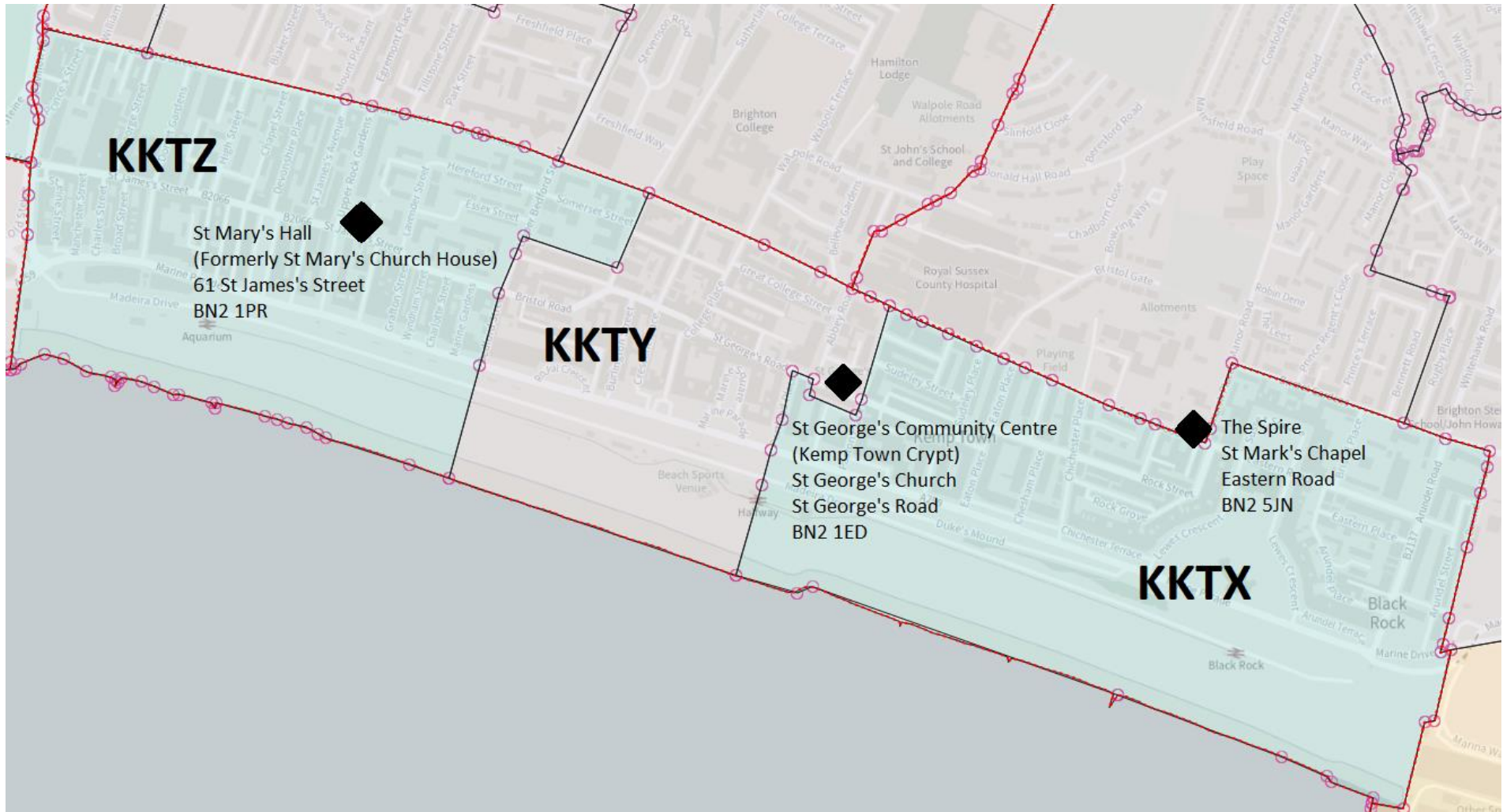
Constituency	Polling District	Polling District Electorate	Polling Place Electorate	Polling Place	Number of Polling Stations
Pavilion	PHFW	1442	1234	City Gate @ The Dip, 119D Hollingdean Terrace, BN1 7HB	1
Pavilion	PHFX	1997	1736	St Richard's Community Hall, Mountfields, Beal Crescent, BN1 7BU	1
Pavilion	PHFY	3840	3355	Stanford Avenue Methodist Church, Southdown Avenue Entrance, BN1 6FD	2
Pavilion	PHFZ	3637	3107	St Matthias Church Hall, Hollingbury Park Avenue, BN1 7JQ	2



Kemptown, Brighton Kemptown

The 2022 scheme worked well at the local elections. All venues are well located and accessible. Therefore, no changes are proposed.

Constituency	Polling District	Polling District Electorate	Polling Place Electorate	Polling Place	Number of Polling Stations
Kemptown	KKTX	2992	2518	The Spire, St Mark's Chapel, Eastern Road, BN2 5JN	2
Kemptown	KKTY	1790	1560	St George's Community Centre (Kemp Town Crypt), St George's Church, St George's Road, BN2 1ED	1
Kemptown	KKTZ	3801	3300	St Mary's Hall (Formerly St Mary's Church House), 61 St James's Street, BN2 1PR	2



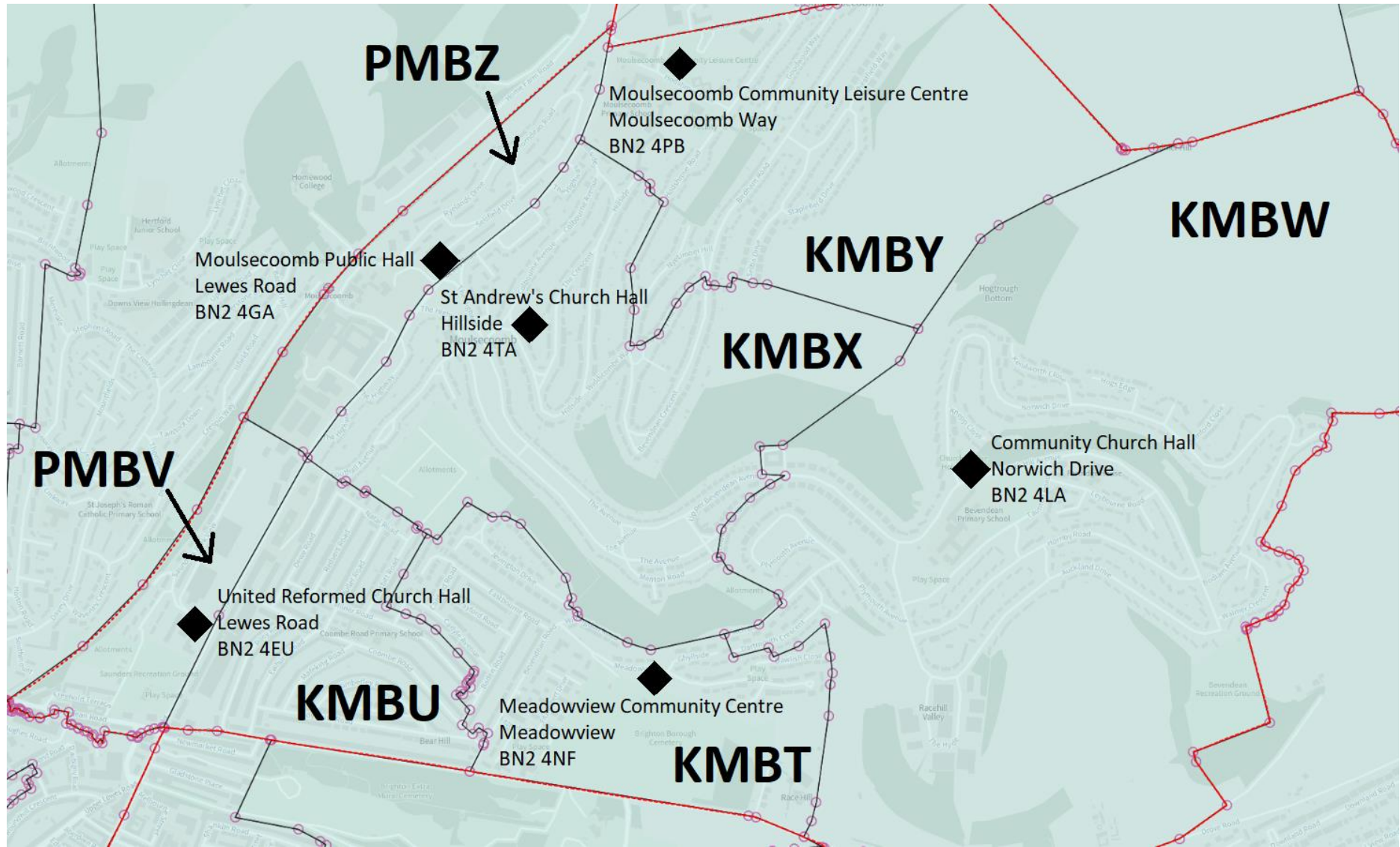
Moulsecoomb & Bevendean, Brighton Pavilion & Brighton Kemptown

Unfortunately, there were administrative complications in using Student Castle – Community Space which if replicated at a general election would bring significant amounts of risk to the election. It is therefore proposed that electors in KMBU vote at United Reformed Church Hall, Lewes Road. The polling place is already used for electors in PMBV, and although located on the other side of the Lewes Road, it is located close to pedestrian crossings and many amenities serving the polling district and ward.

A return to Coombe Road Primary School was considered. However, booking this venue previously has caused significant delays. This is not feasible with a general election due before January 2025 and the timelines for poll card printing significantly shortened due to changes related to the Elections Act 2022.

The 2022 scheme worked well at the local elections for all other polling districts, and therefore no further changes are proposed.

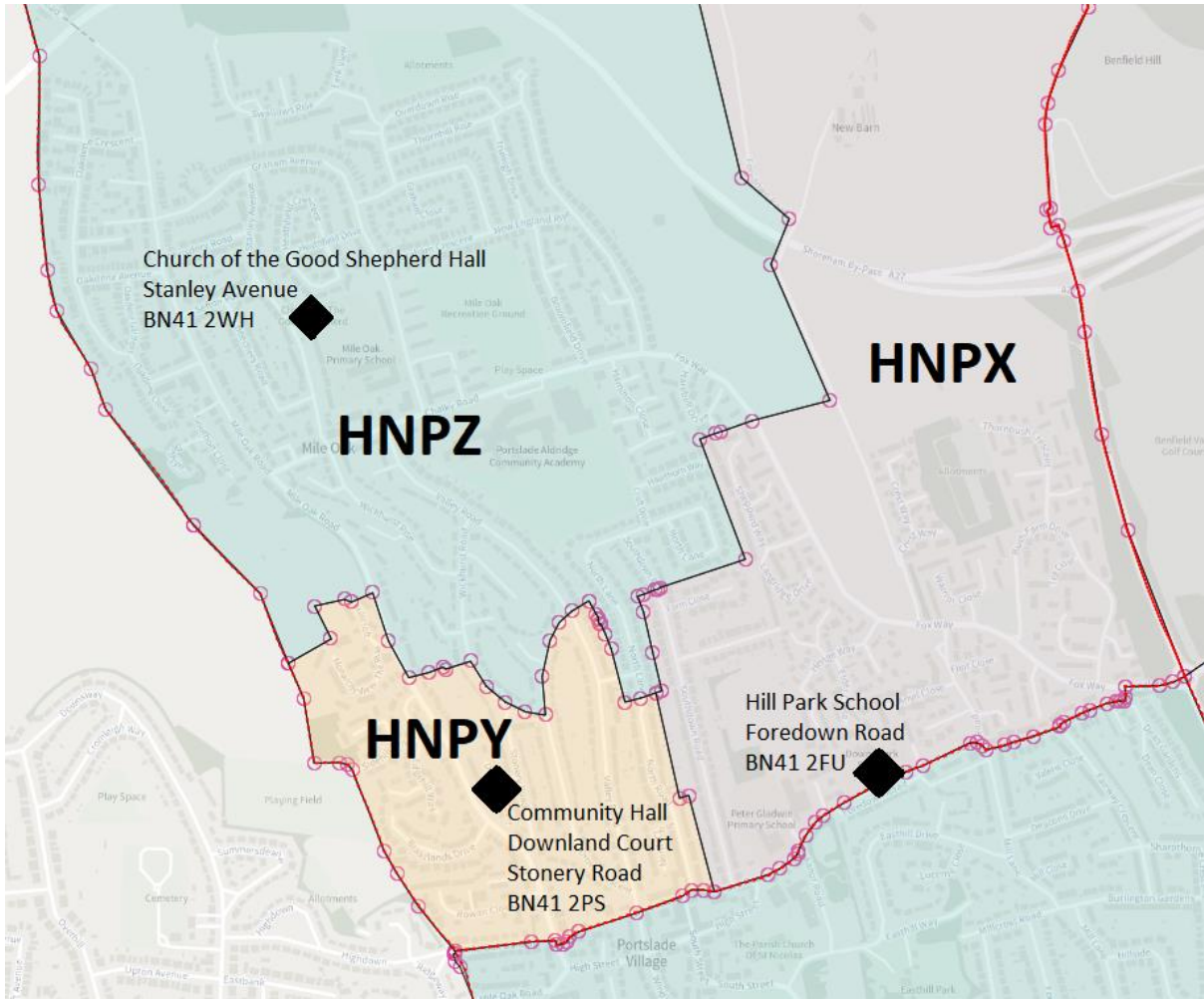
Constituency	Polling District	Polling District Electorate	Polling Place Electorate	Polling Place	Number of Polling Stations
Kemptown	KMBT	1258	1097	Meadowview Community Centre, Meadowview, BN2 4NF	1
Kemptown	KMBU	2712	2473	United Reformed Church Hall, Lewes Road, BN2 4EU	2
Kemptown	KMBW	2015	1763	Community Church Hall, Norwich Drive, BN2 4LA	1
Kemptown	KMBX	1982	1780	St Andrew's Church Hall, Hillside, BN2 4TA	1
Kemptown	KMBY	1290	1110	Moulsecoomb Community Leisure Centre, Moulsecoomb Way, BN2 4PB	1
Pavilion	PMBV	623	571	United Reformed Church Hall, Lewes Road, BN2 4EU	1
Pavilion	PMBZ	509	454	Moulsecoomb Public Hall, Lewes Road, BN2 4GA	1



North Portslade, Hove

The 2022 scheme worked well at the local elections. All venues are well located and accessible. Therefore, no changes are proposed.

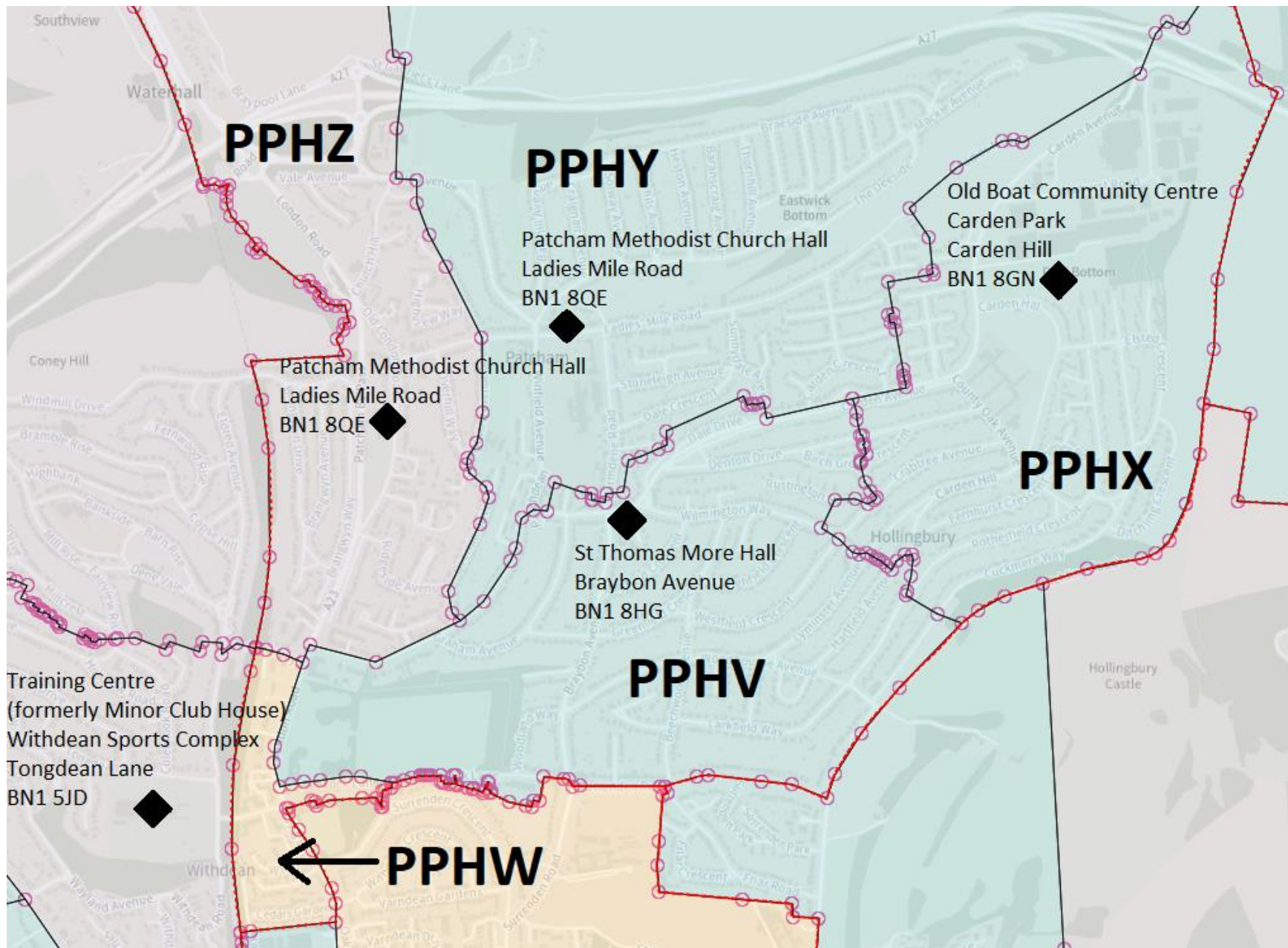
Constituency	Polling District	Polling District Electorate	Polling Place Electorate	Polling Place	Number of Polling Stations
Hove	HNPX	1942	1561	Hill Park School, Foredown Road, BN41 2FU	1
Hove	HNPY	1478	1249	Community Hall, Downland Court, Stonery Road, BN41 2PS	1
Hove	HNPZ	4126	3463	Church of the Good Shepherd Hall, Stanley Avenue, BN41 2WH	2



Patcham & Hollingbury, Brighton Pavilion

The 2022 scheme worked well at the local elections. All venues are well located and accessible. Therefore, no changes are proposed.

Constituency	Polling District	Polling District Electorate	Polling Place Electorate	Polling Place	Number of Polling Stations
Pavilion	PPHV	3302	2727	St Thomas More Hall, Braybon Avenue, BN1 8HG	2
Pavilion	PPHW	714	562	Training Centre, (formerly Minor Club House), Withdean Sports Complex, Tongdean Lane, BN1 5JD	1
Pavilion	PPHX	2007	1680	Old Boat Community Centre, Carden Park, Carden Hill, BN1 8GN	1
Pavilion	PPHY	3704	3094	Patcham Methodist Church Hall, Ladies Mile Road, BN1 8QE	2
Pavilion	PPHZ	1809	1428	Patcham Memorial Hall, 3 Old London Road, BN1 8XR	1



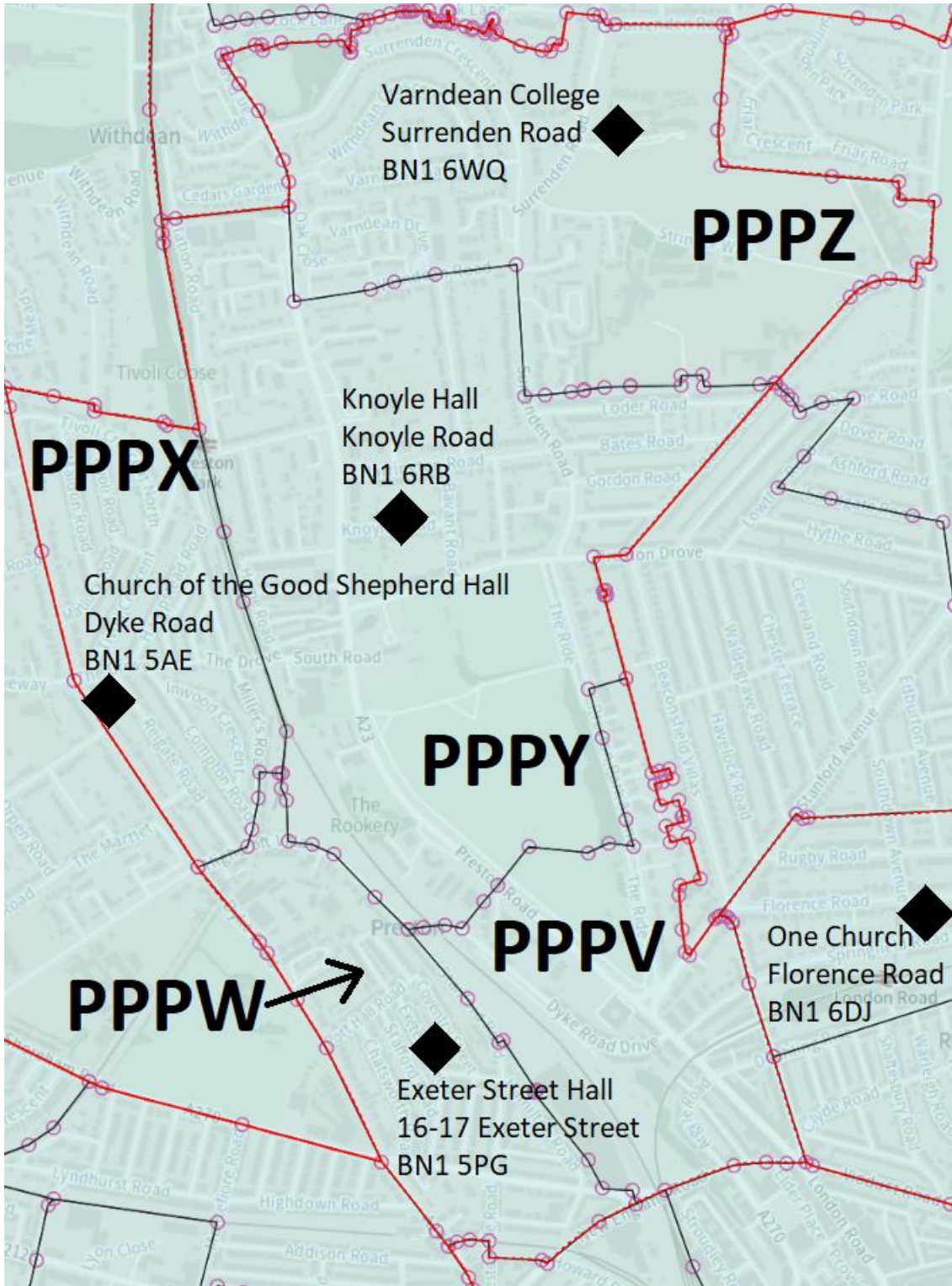
Preston Park, Brighton Pavilion

The 2022 scheme worked well at the local elections. All venues were well located and accessible.

Unfortunately, there were administrative complications in using St Augustine's Centre which if replicated at a general election would bring significant amounts of risk to the election. It is therefore proposed that electors in PPPV vote at One Church, Florence Road. The venue has previously operated as a polling place, is accessible and well-known.

No other changes are proposed.

Constituency	Polling District	Polling District Electorate	Polling Place Electorate	Polling Place	Number of Polling Stations
Pavilion	PPPV	1791	1606	One Church Front Hall, Florence Road, BN1 6DJ	1
Pavilion	PPPW	2853	2559	Exeter Street Hall, 16-17 Exeter Street, BN1 5PG	2
Pavilion	PPPX	2025	1757	Church of the Good Shepherd Hall, Dyke Road, BN1 5AE	1
Pavilion	PPPY	3524	2996	Knogle Hall, Knogle Road, BN1 6RB	2
Pavilion	PPPZ	1100	874	Varndean College, Surrenden Road, BN1 6WQ	1



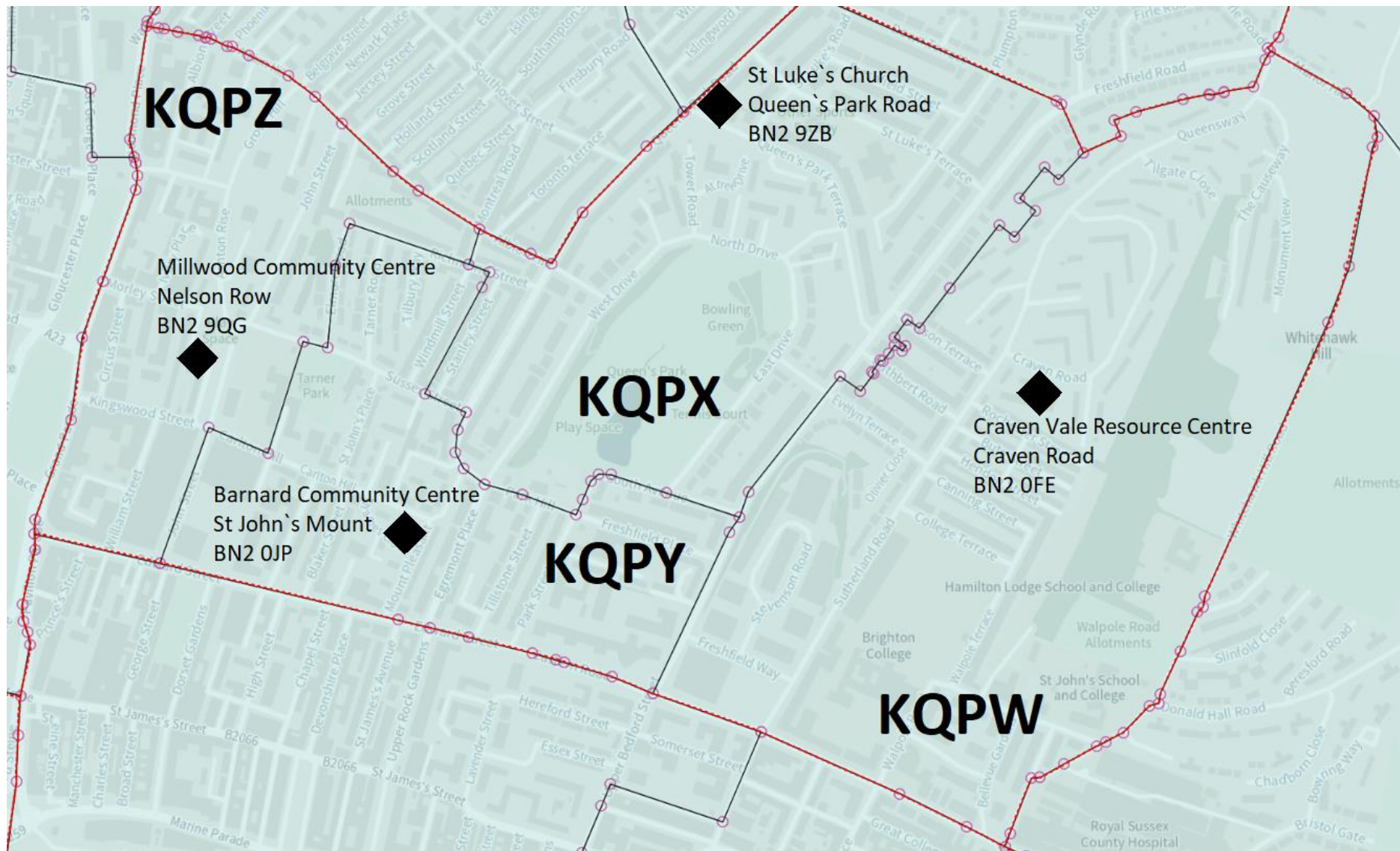
Queen's Park, Brighton Kemptown

The 2022 scheme worked well at the local elections. All venues are well located and accessible.

Brighton Youth Centre is due for redevelopment and has therefore been withdrawn from the scheme. It is proposed that Barnard Community Centre, St John's Mount replaces it as the polling place for KQPY. The venue is centrally located in the district and accessible.

No further changes are proposed.

Constituency	Polling District	Polling District Electorate	Polling Place Electorate	Polling Place	Number of Polling Stations
Kemptown	KQPW	1744	1502	Craven Vale Resource Centre, Craven Road, BN2 0FE	1
Kemptown	KQPX	1810	1567	St Luke's Church, Queen's Park Road, BN2 9ZB	1
Kemptown	KQPY	1731	1439	Barnard Community Centre, St John's Mount, Mount Pleasant, BN2 0JP	1
Kemptown	KQPZ	1681	1461	Millwood Community Centre, Nelson Row, Carlton Hill, BN2 9QG	1



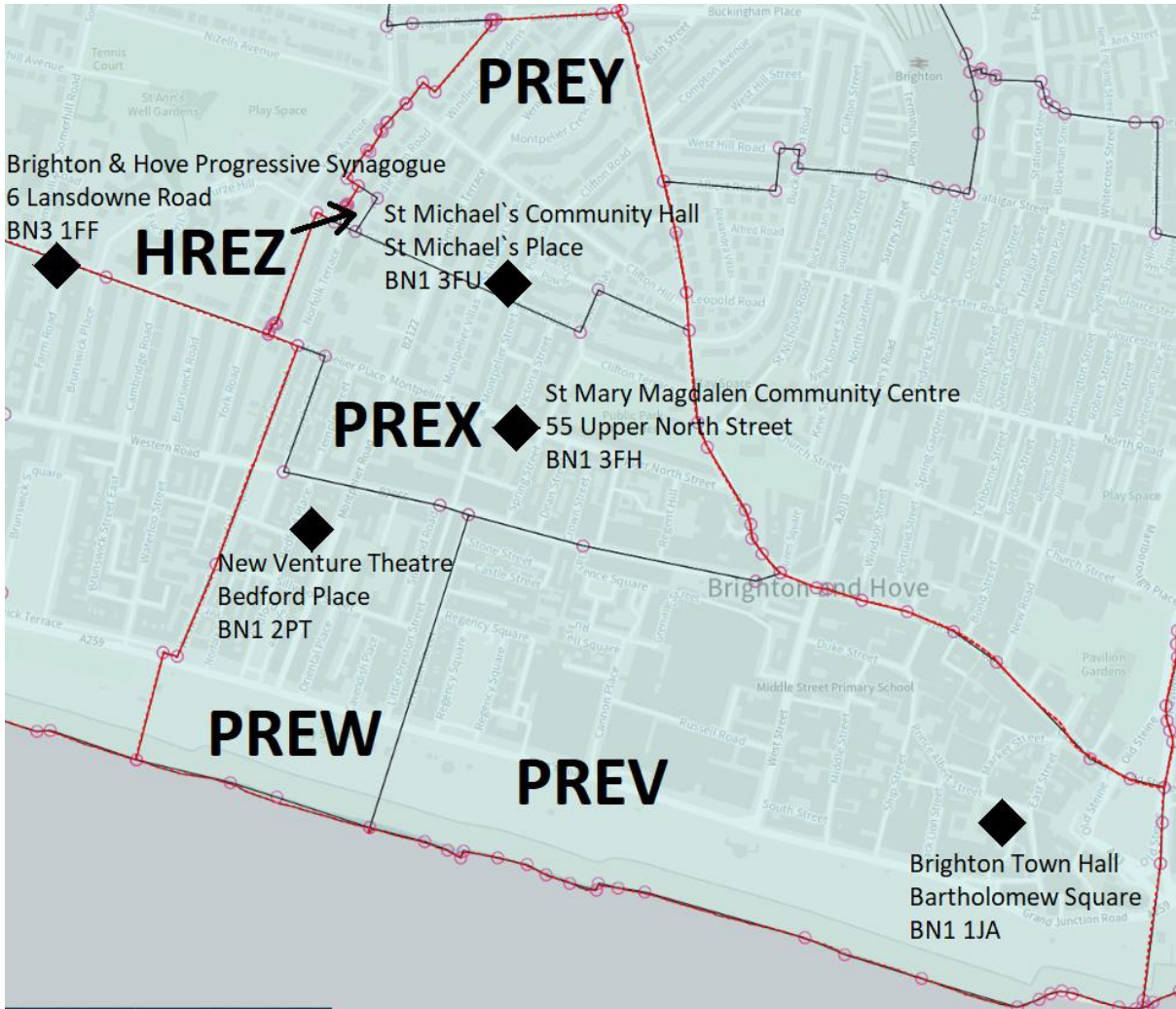
Regency, Brighton Pavilion & Hove

The 2022 scheme worked well at the local elections. Both venues are well located and accessible. Therefore, no changes are proposed.

As per the 2022 review, a small number of properties on Temple Heights/Windlesham Road were added to Regency 2022 by the Local Government Boundary Commission England

These properties are within Hove constituency and as such will form their own small polling district. At Parliamentary elections electors will attend the polling station for adjoining polling district HGOV. At local elections, they will vote at the polling station for PREY. At a combined election, they will vote at the HGOV polling station.

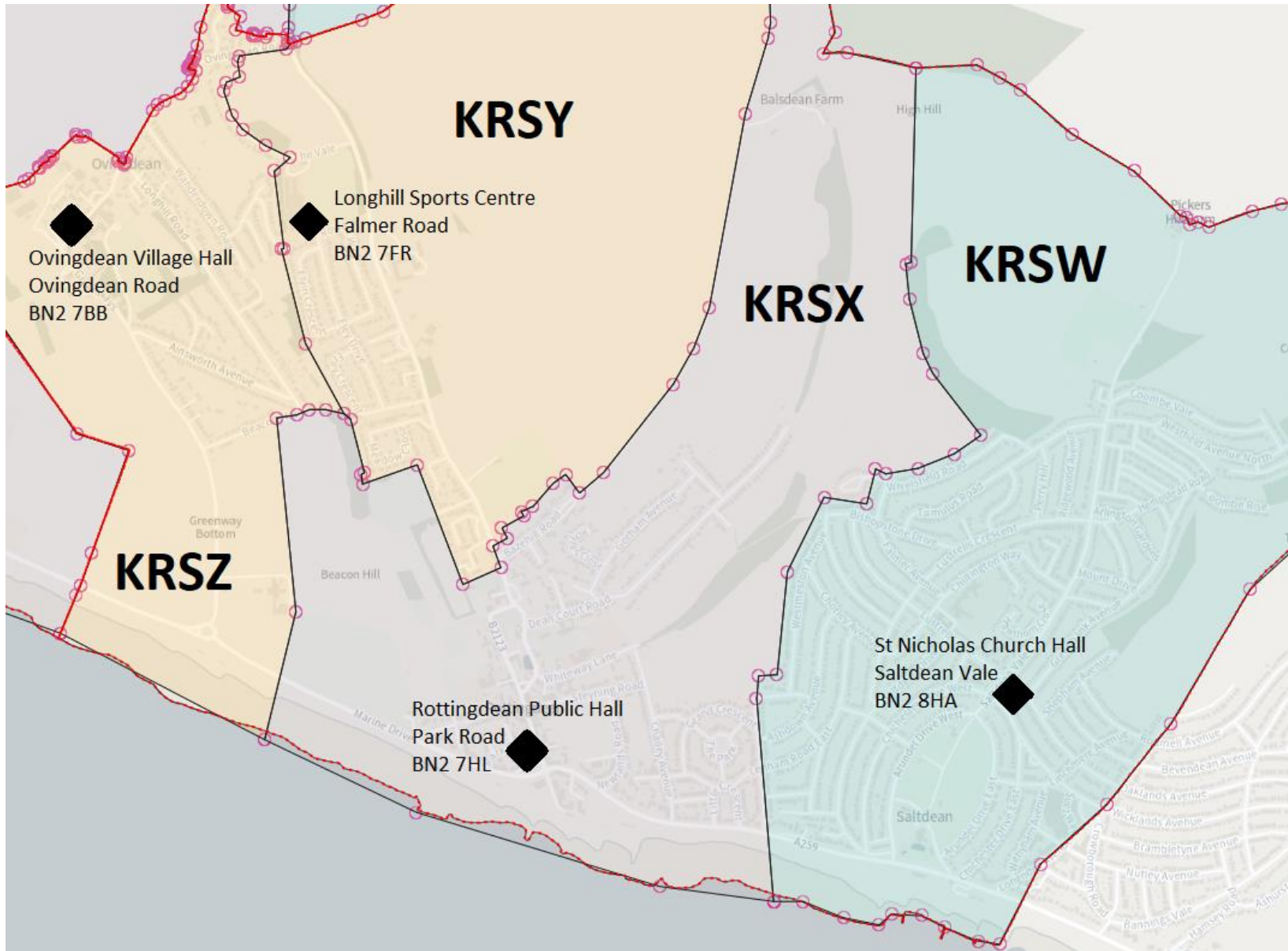
Constituency	Polling District	Polling District Electorate	Polling Place Electorate	Polling Place	Number of Polling Stations
Hove	HREZ	26	19	St Michael's Community Hall, St Michael's Place, BN1 3FU; or Brighton & Hove Progressive Synagogue, 6 Lansdowne Road, BN3 1FF	0
Pavilion	PREV	1653	1477	Brighton Town Hall, Bartholomew Square, BN1 1JA	1
Pavilion	PREW	1920	1735	New Venture Theatre, Bedford Place, BN1 2PT	1
Pavilion	PREX	1983	1764	St Mary Magdalen Community Centre, 55 Upper North Street, BN1 3FH	1
Pavilion	PREY	1941	1698	St Michael's Community Hall, St Michael's Place, BN1 3FU	1



Rottingdean & West Saltdean, Brighton Kemptown

The 2022 scheme worked well at the local elections. All venues are well located and accessible. Therefore, no changes are proposed.

Constituency	Polling District	Polling District Electorate	Polling Place Electorate	Polling Place	Number of Polling Stations
Kemptown	KRSW	4587	3600	St Nicholas Church Hall, Saltdean Vale, BN2 8HA	3
Kemptown	KRSX	1844	1459	Rottingdean Public Hall, Park Road, BN2 7HL	1
Kemptown	KRSY	874	661	Longhill Sports Centre, Falmer Road, BN2 7FR	1
Kemptown	KRSZ	939	729	Ovingdean Village Hall, Ovingdean Road, BN2 7BB	1



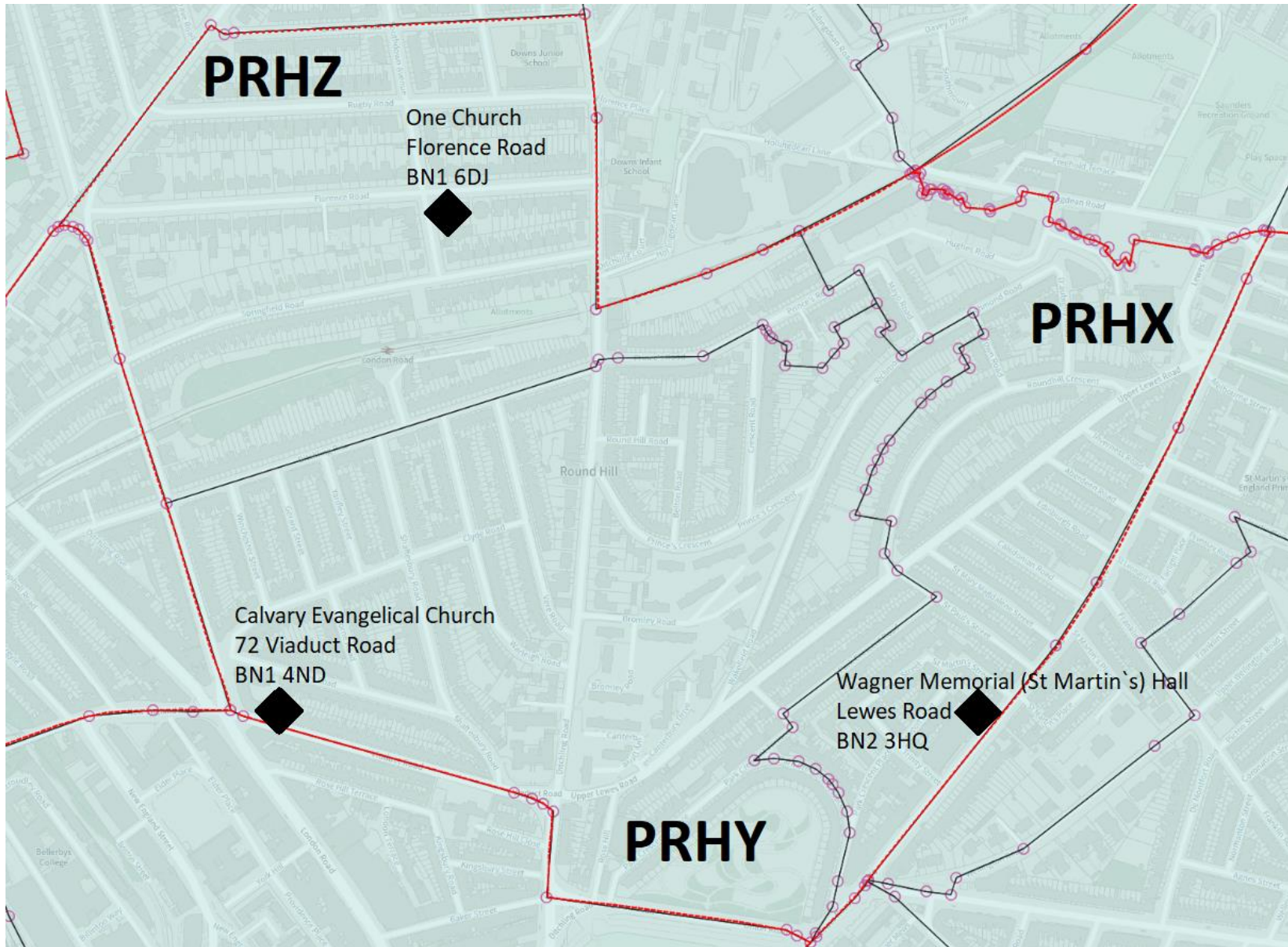
Round Hill, Brighton Pavilion

The 2022 scheme worked well at the local elections. All venues were well located and accessible.

Unfortunately, there were administrative complications in using St Augustine's Centre which if replicated at a general election would bring significant amounts of risk to the election. It is therefore proposed that electors in PPPV vote at One Church, Florence Road. The venue has previously operated as a polling place, is accessible and well-known.

No other changes are proposed.

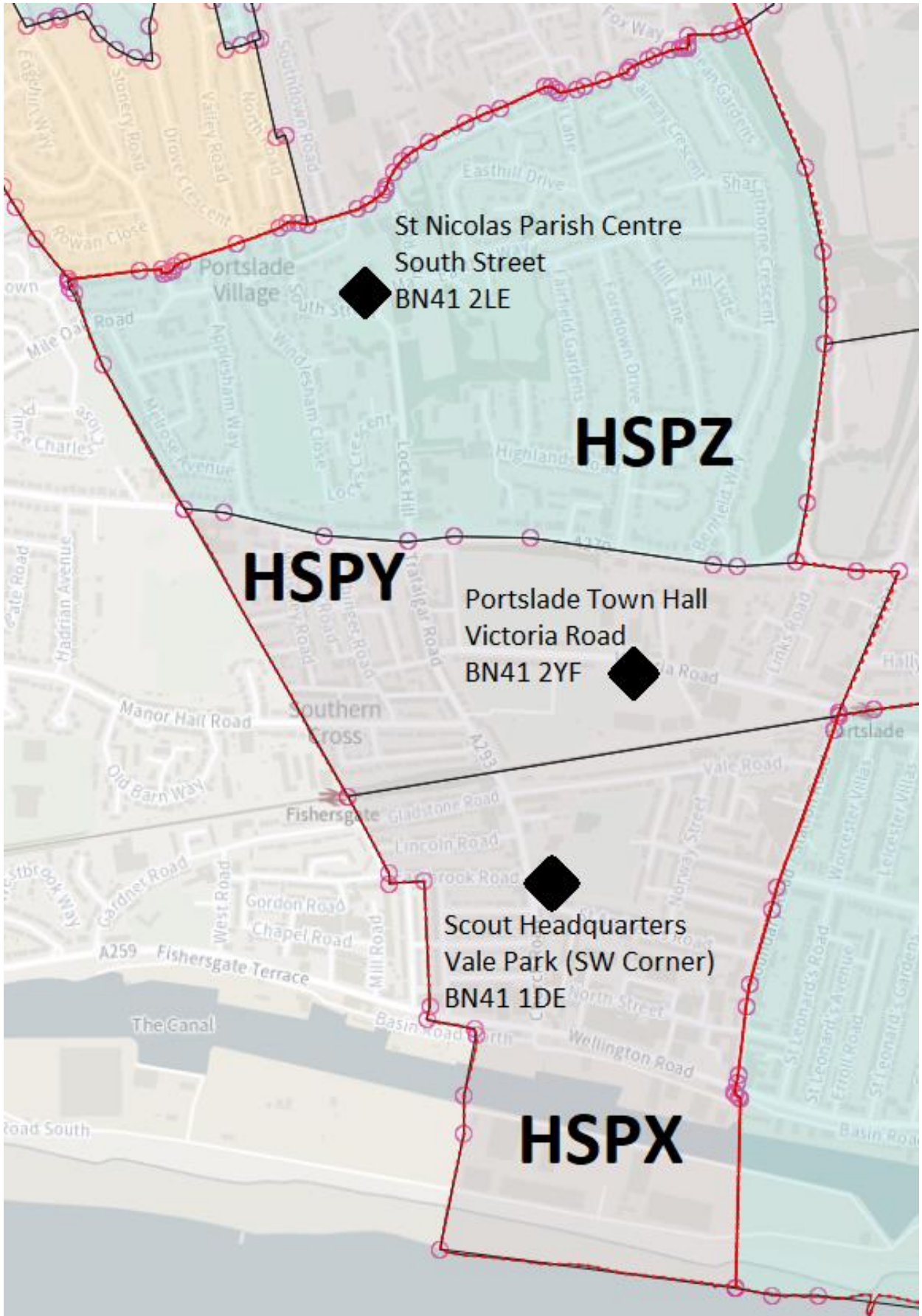
Constituency	Polling District	Polling District Electorate	Polling Place Electorate	Polling Place	Number of Polling Stations
Pavilion	PRHX	1806	1690	Wagner Memorial (St Martin's) Hall, Lewes Road, BN2 3HQ	1
Pavilion	PRHY	3171	2910	Calvary Evangelical Church, (Main Entrance), 72 Viaduct Road, BN1 4ND	2
Pavilion	PRHZ	1604	1449	One Church Front Hall, Florence Road, BN1 6DJ	1



South Portslade, Hove

The 2022 scheme worked well at the local elections. All venues are well located and accessible. Therefore, no changes are proposed.

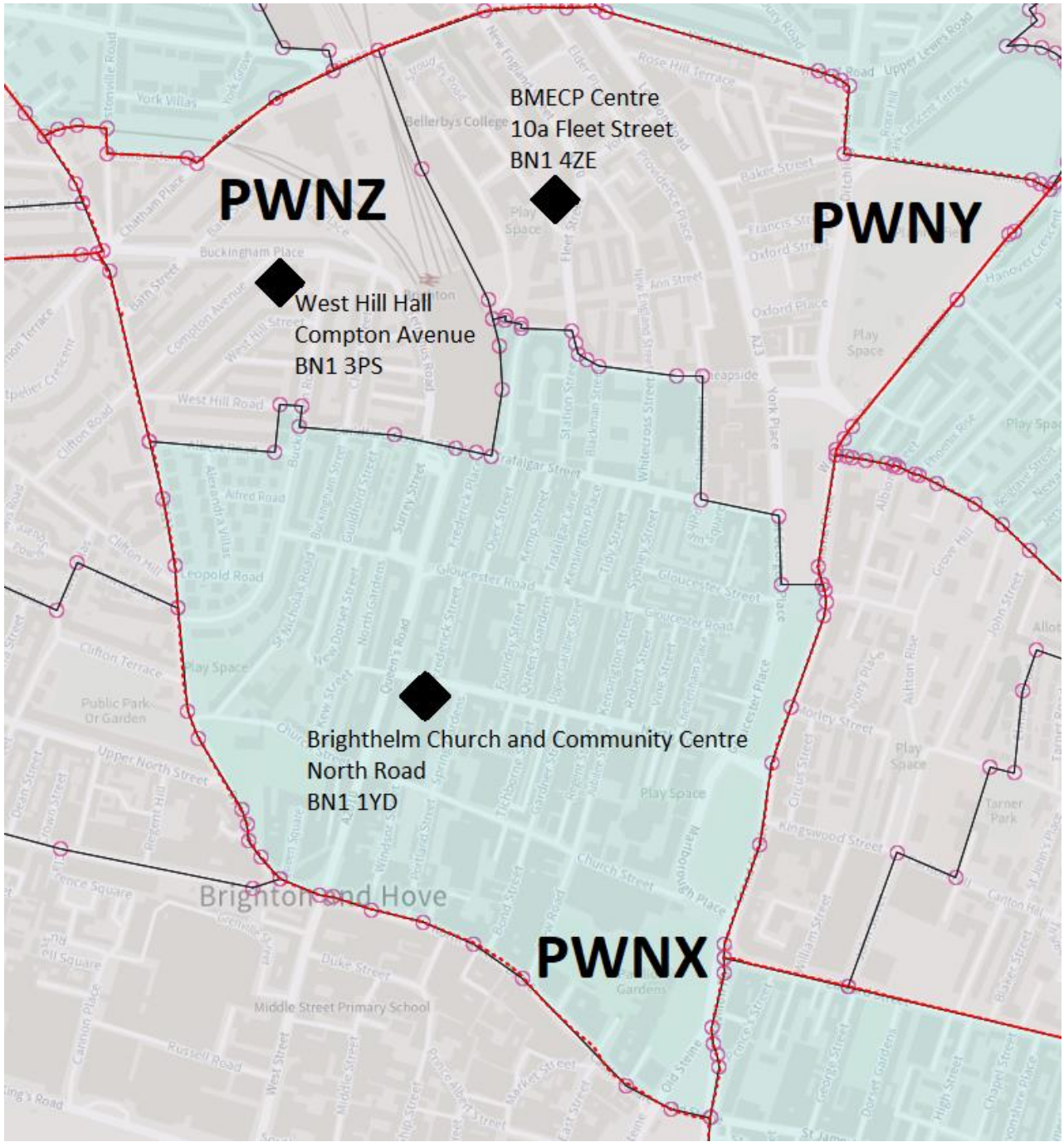
Constituency	Polling District	Polling District Electorate	Polling Place Electorate	Polling Place	Number of Polling Stations
Hove	HSPX	1919	1696	Scout Headquarters, Vale Park, (SW Corner), BN41 1DE	1
Hove	HSPY	1834	1604	Portslade Town Hall, Victoria Road, BN41 2YF	1
Hove	HSPZ	3577	2960	St Nicolas Parish Centre, South Street, BN41 2LE	2



West Hill & North Laine, Brighton Pavilion

The 2022 scheme worked well at the local elections. All venues are well located and accessible. Therefore, no changes are proposed.

Constituency	Polling District	Polling District Electorate	Polling Place Electorate	Polling Place	Number of Polling Stations
Pavilion	PWNX	3664	3266	Briarthelm Church and Community Centre, North Road, BN1 1YD	2
Pavilion	PWNY	1766	1614	BMECP Centre, 10a Fleet Street, BN1 4ZE	1
Pavilion	PWNZ	1812	1665	West Hill Hall, Compton Avenue, BN1 3PS	1



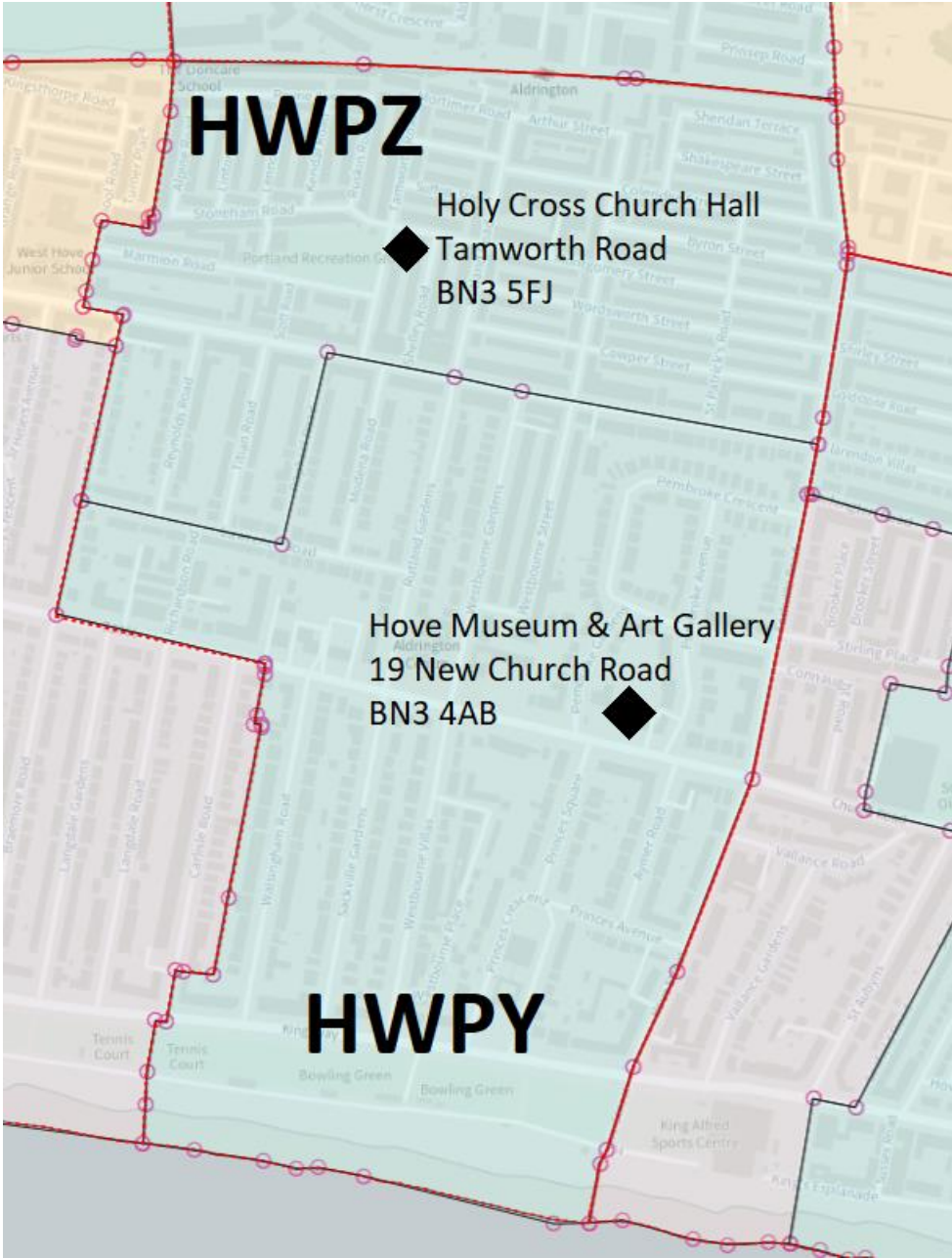
Westbourne & Poets' Corner, Hove

The 2022 scheme worked well at the local elections. All venues were well located and accessible.

Unfortunately, St Philip's Church is closing and it has been confirmed that the space will be unavailable for polling. It is therefore proposed that the ward will be split into two polling districts. Each district will have a double polling station.

Electors in HWPZ will vote at Holy Cross Church Hall. Whilst electors in HWPY will vote at Hove Museum and Art Gallery. Both these venues are accessible and have been operating as polling places previously.

Constituency	Polling District	Polling District Electorate	Polling Place Electorate	Polling Place	Number of Polling Stations
Hove	HWPY	3499	2969	Hove Museum and Art Gallery, 19 New Church Road, BN3 4AB	1
Hove	HWPZ	3768	3306	Holy Cross Church Hall, Tamworth Road, BN3 5FJ	2

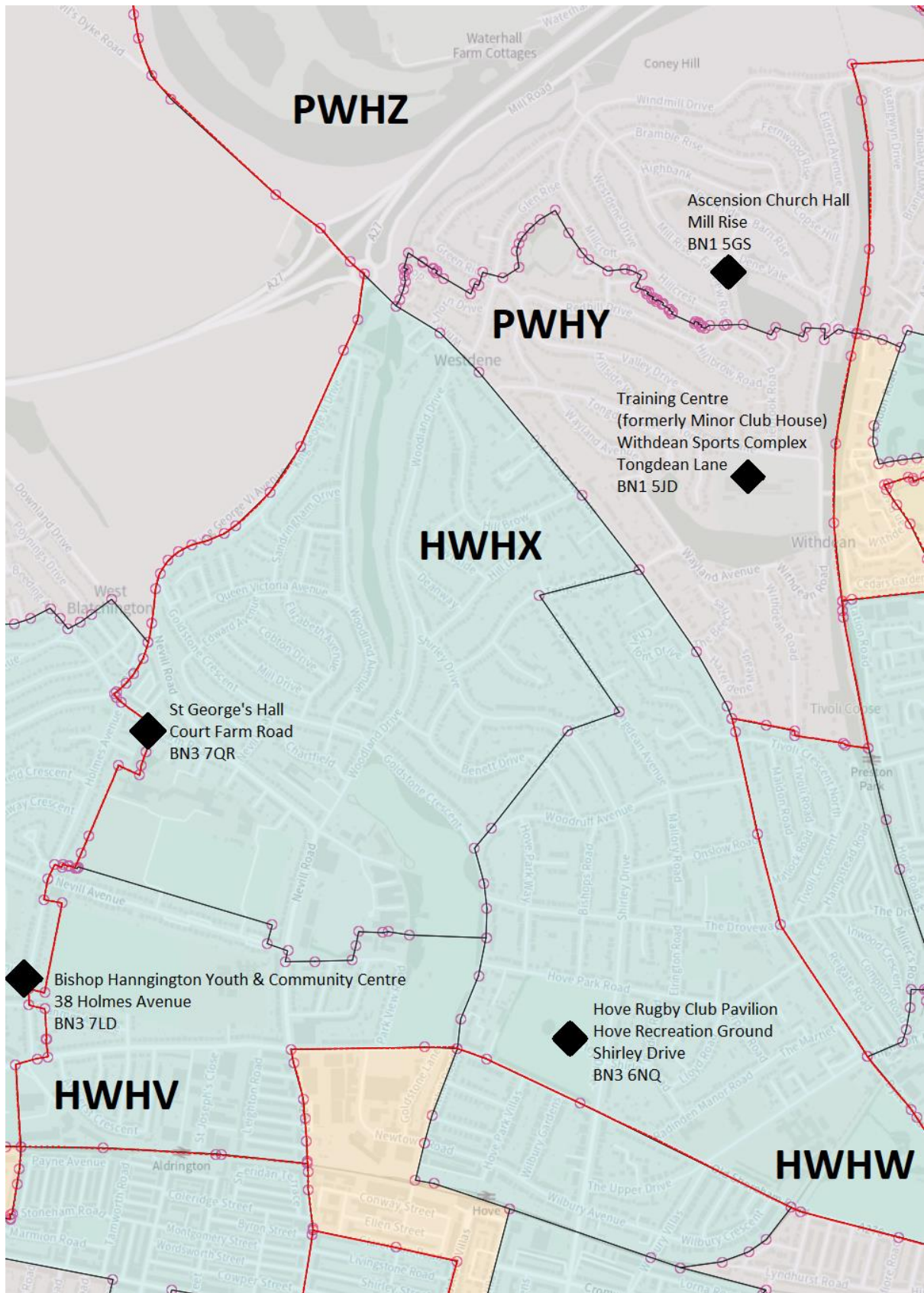


Westdene & Hove Park, Brighton Pavilion & Hove

The 2022 scheme worked well at the local elections. All venues are well located and accessible. Therefore, no changes are proposed.

To further increase accessibility at Hove Rugby Club Pavilion – a security guard will be present, at the Shirley Drive gate, to assist electors who may need to drive closer to venue on the internal path.

Constituency	Polling District	Polling District Electorate	Polling Place Electorate	Polling Place	Number of Polling Stations
Hove	HWHV	2028	1609	Bishop Hannington Youth & Community Centre, 38 Holmes Avenue, BN3 7LD	1
Hove	HWHW	2234	1648	Hove Rugby Club Pavilion, Hove Recreation Ground, Shirley Drive, BN3 6NQ	1
Hove	HWHX	3787	2833	St George's Hall, Court Farm Road, BN3 7QR	2
Pavilion	PWHY	1631	1294	Training Centre, (formerly Minor Club House), Withdean Sports Complex, Tongdean Lane, BN1 5JD	1
Pavilion	PWHZ	1883	1505	Ascension Church Hall, Mill Rise, BN1 5GS	1

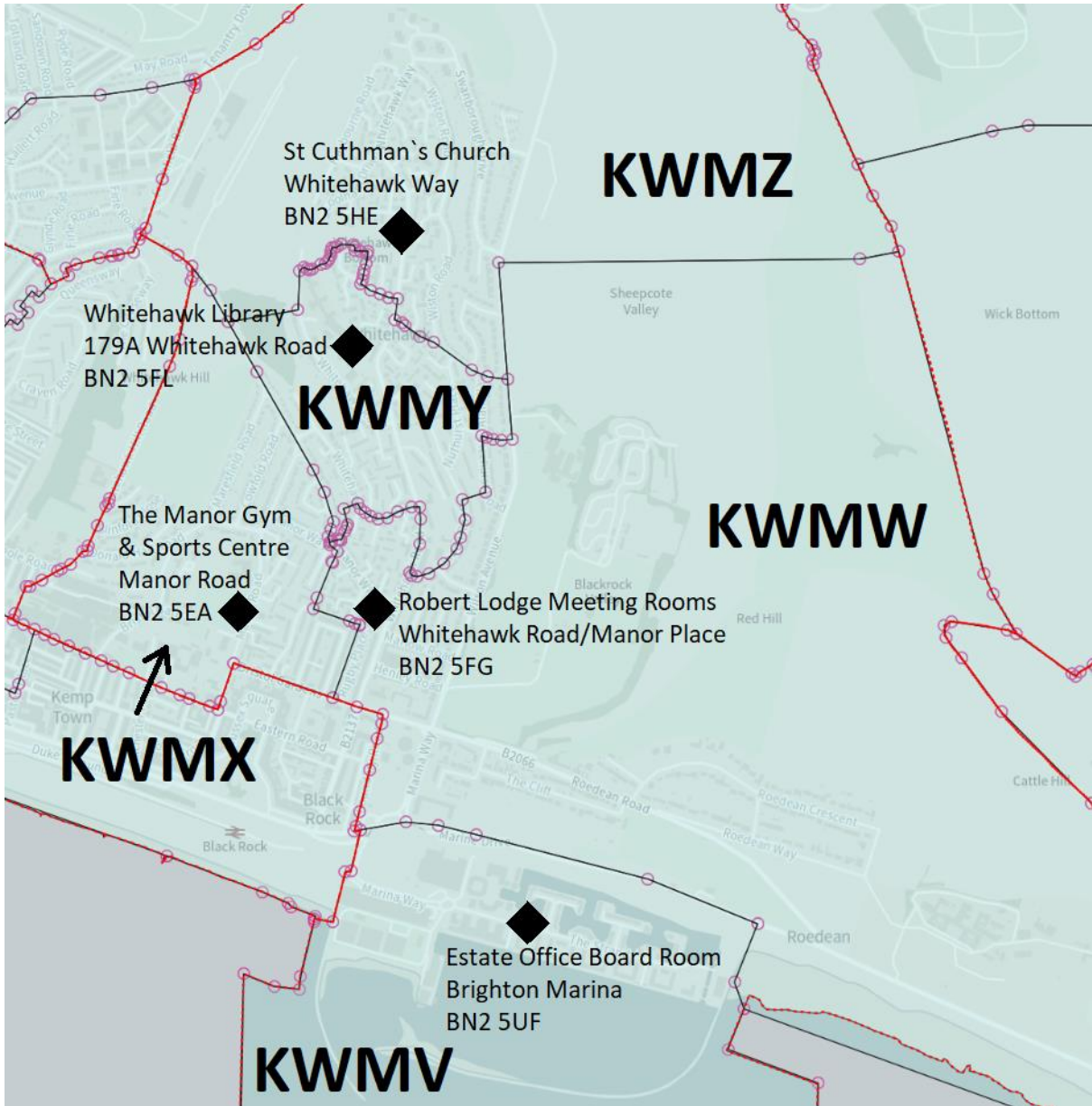


Whitehawk & Marina, Brighton Kemptown

The 2022 scheme worked well at the local elections. All venues were well located and accessible.

Whitehawk Inn could not be confirmed as available for future elections so an alternative venue – Robert Lodge, Manor Place has been proposed as an alternative. The venue provides an accessible space for polling.

Constituency	Polling District	Polling District Electorate	Polling Place Electorate	Polling Place	Number of Polling Stations
Kemptown	KWMV	1026	856	Estate Office Board Room, Brighton Marina, BN2 5UF	1
Kemptown	KWMW	1738	1404	Robert Lodge Community Room, Manor Place, Whitehawk Road, BN2 5FG	1
Kemptown	KWMX	1852	1529	The Manor Gym & Sports Centre, Manor Road, BN2 5EA	1
Kemptown	KWMY	1678	1372	Whitehawk Library, 179A Whitehawk Road, BN2 5FL	1
Kemptown	KWMZ	2020	1673	St Cuthman's Church, Whitehawk Way, BN2 5HE	1

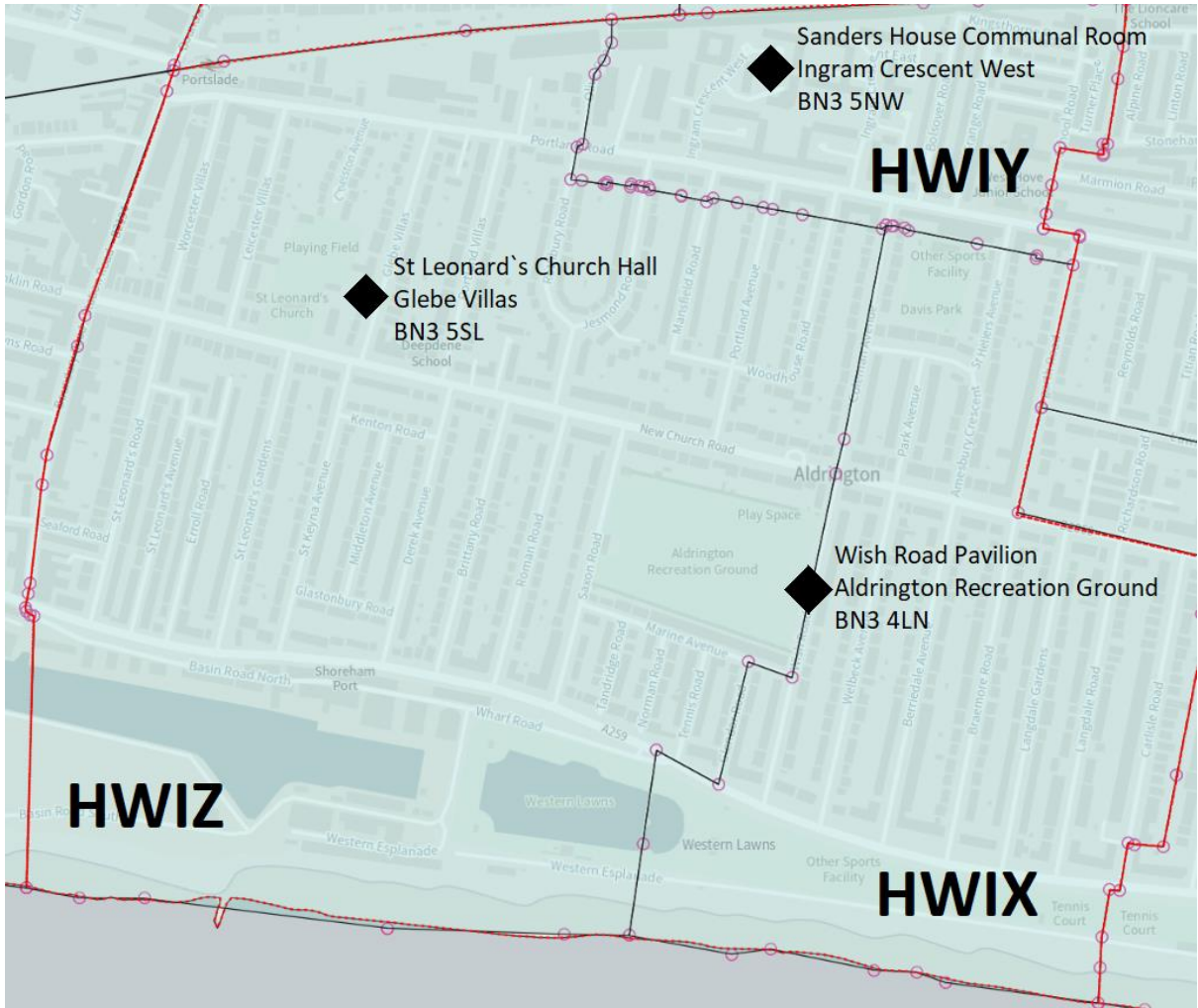


Wish, Hove

The 2022 scheme worked well at the local elections. All venues were well located and accessible.

Unfortunately, St Philip's Church will be closing and will therefore be unavailable for polling. With no other suitable venues available in the east of the ward or neighbouring Westbourne & Poets' Corner, it is proposed that a polling place at the Pavilion on Wish Road, Aldrington Recreation Ground will be reinstated. A ramp will be supplied to ensure step free access is available. The Returning Officer will also be providing additional polling booth lighting to ensure that the venue meets accessibility requirements.

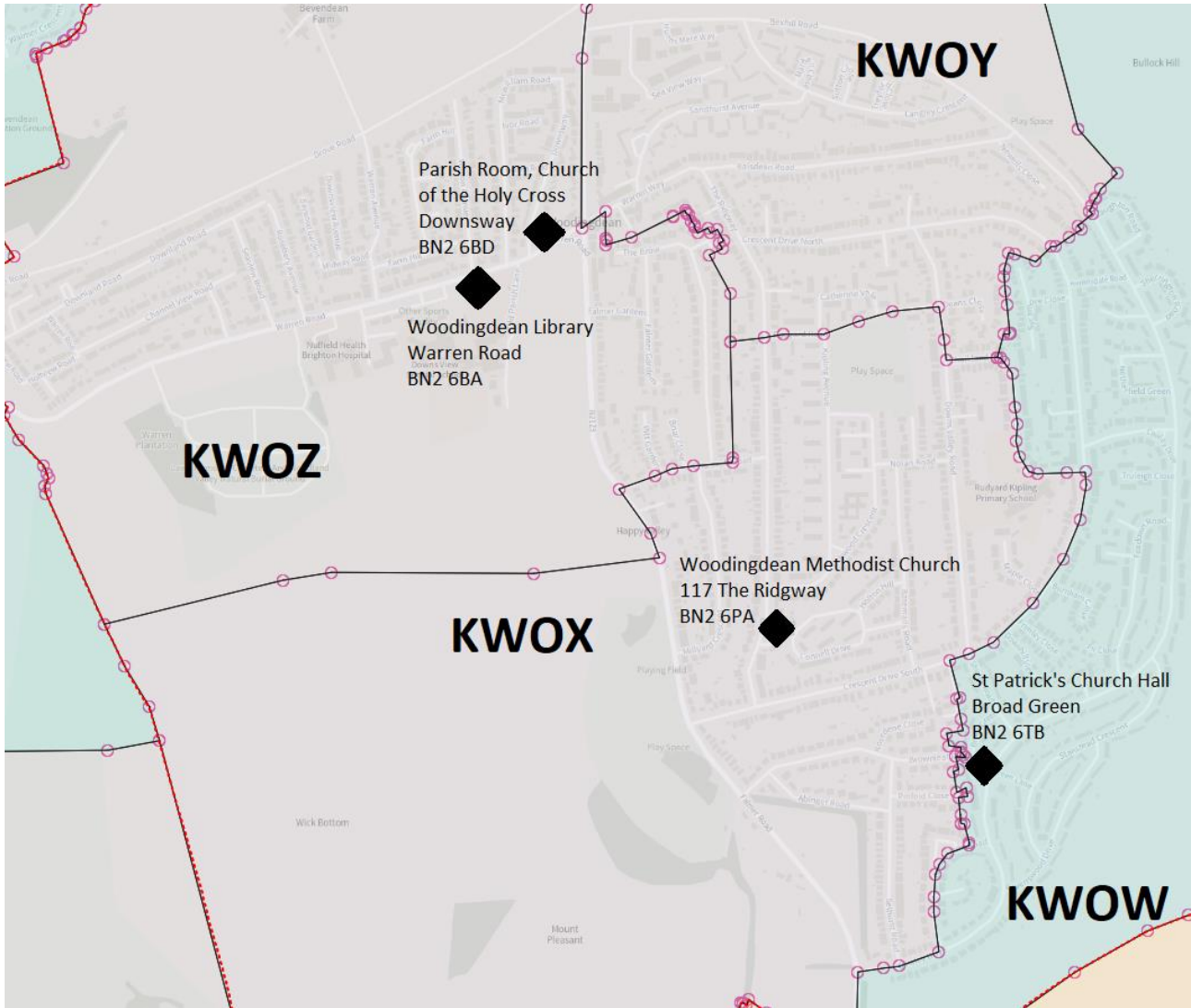
Constituency	Polling District	Polling District Electorate	Polling Place Electorate	Polling Place	Number of Polling Stations
Hove	HWIX	1925	1530	Pavilion on Wish Road, Aldrington Recreation Ground	1
Hove	HWIY	1355	1128	Sanders House Communal Room, Ingram Crescent West, BN3 5NW	1
Hove	HWIZ	4052	3377	St Leonard's Church Hall, (formerly Glebe Villas Hall), Glebe Villas, BN3 5SL	2



Woodingdean, Brighton Kemptown

The 2022 scheme worked well at the local elections. All venues are well located and accessible. Therefore, no changes are proposed.

Constituency	Polling District	Polling District Electorate	Polling Place Electorate	Polling Place	Number of Polling Stations
Kemptown	KWOW	1998	1632	St Patrick's Church Hall, Broad Green, BN2 6TB	1
Kemptown	KWOX	1905	1569	Woodingdean Methodist Church, 117 The Ridgway, BN2 6PA	1
Kemptown	KWOY	1637	1320	Parish Room, Church of the Holy Cross, Downsway, BN2 6BD	1
Kemptown	KWOZ	1813	1410	Woodingdean Library, Warren Road, BN2 6BA	1



Full Polling Place Scheme

Polling District	Ward name	Constituency	Electorate	Polling Place electorate	Polling Place	Number of Polling Stations
HBAY	Brunswick & Adelaide	Hove	4076	3698	Baptist Church Hall, Holland Road, BN3 1JN	2
HBAZ	Brunswick & Adelaide	Hove	3355	2987	Cornerstone Community Centre, Church Road, BN3 2FL	2
HCHY	Central Hove	Hove	6630	5746	Hove Town Hall, Norton Road, BN3 3BQ	3
HCHZ	Central Hove	Hove	1604	1434	Hove Library, 182 - 186 Church Road, BN3 2EG	1
HGOV	Goldsmid	Hove	2075	1707	Brighton & Hove Progressive Synagogue, 6 Lansdowne Road, BN3 1FF	1
HGOW	Goldsmid	Hove	2070	1790	St Luke`s Prestonville, 64 Old Shoreham Road, BN1 5DD	1
HGOX	Goldsmid	Hove	3722	3159	All Saints Church Hall, All Saints Church, Eaton Road, BN3 3QE	2
HGOY	Goldsmid	Hove	1980	1623	Hove Rugby Club Pavilion, Hove Recreation Ground, Shirley Drive, BN3 6NQ	1
HGOZ	Goldsmid	Hove	680	548	Vallance Community Centre, Conway Court, Sackville Road, BN3 3WR	1
HHKV	Hangleton & Knoll	Hove	1943	1597	St Richard`s Community Centre, Egmont Road, BN3 7FP	1
HHKW	Hangleton & Knoll	Hove	3415	2767	Hounsom Memorial Church Hall, 200 Nevill Avenue, BN3 7NG	2
HHKX	Hangleton & Knoll	Hove	1923	1517	At the Oasis, Hangleton Way, BN3 8EQ	1
HHKY	Hangleton & Knoll	Hove	1904	1564	Hangleton Community Centre, Harmsworth Crescent, BN3 8BW	1

HHKZ	Hangleton & Knoll	Hove	1742	1357	St Helen`s Church Hall, Hangleton Way, BN3 8ER	1
HNPX	North Portslade	Hove	1942	1561	Hill Park School (Lower Site), Foredown Road, BN41 2FU	1
HNPY	North Portslade	Hove	1478	1249	Community Hall, Downland Court, Stonery Road, BN41 2PS	1
HNPZ	North Portslade	Hove	4126	3463	Church of the Good Shepherd Hall, Stanley Avenue, BN41 2WH	2
HREZ	Regency	Hove	26	19	St Michael`s Community Hall, St Michael`s Place, BN1 3FU; or Brighton & Hove Progressive Synagogue, 6 Lansdowne Road, BN3 1FF	0
HSPX	South Portslade	Hove	1919	1696	Scout Headquarters, Vale Park, (Sw Corner), BN41 1DE	1
HSPY	South Portslade	Hove	1834	1604	Portslade Town Hall, Victoria Road, BN41 2YF	1
HSPZ	South Portslade	Hove	3577	2960	St Nicolas Parish Centre, South Street, BN41 2LE	2
HWHV	Westdene & Hove Park	Hove	2028	1609	Bishop Hannington Youth & Community Centre, 38 Holmes Avenue, BN3 7LD	1
HWHW	Westdene & Hove Park	Hove	2234	1648	Hove Rugby Club Pavilion, Hove Recreation Ground, Shirley Drive, BN3 6NQ	1
HWHX	Westdene & Hove Park	Hove	3787	2833	St George`s Hall, Court Farm Road, BN3 7QR	2
HWIX	Wish	Hove	1925	1530	Wish Road Pavilion, Aldrington Recreation Ground, Wish Road, BN3 4LN	1
HWIY	Wish	Hove	1355	1128	Sanders House Communal Room, Ingram Crescent West, BN3 5NW	1
HWIZ	Wish	Hove	4052	3377	St Leonard`s Church Hall, Glebe Villas, BN3 5SL	2
HWPY	Westbourne & Poets` Corner	Hove	3499	2969	Hove Museum and Art Gallery, 19 New Church Road, BN3 4AB	2
HWPZ	Westbourne & Poets` Corner	Hove	3768	3306	Holy Cross Church Hall, Tamworth Road, BN3 5FJ	2

KCSW	Coldean & Stanmer	Brighton Kempton	417	412	University of Brighton, Village Way, BN1 9PH	1
KCSX	Coldean & Stanmer	Brighton Kempton	1984	1803	St George`s Hall, Newick Road, BN1 9JN	1
KKTX	Kempton	Brighton Kempton	2992	2518	The Spire, St Mark`s Chapel, Eastern Road, BN2 5JN	2
KKTY	Kempton	Brighton Kempton	1790	1560	St George`s Community Centre (Kemp Town Crypt), St. George`s Church, St. George`s Road, BN2 1ED	1
KKTZ	Kempton	Brighton Kempton	3801	3300	St Mary`s Hall, 61 St James`s Street, BN2 1PR	2
KMBT	Moulsecoomb & Bevendean	Brighton Kempton	1258	1097	Meadowview Community Centre, Meadowview, BN2 4NF	1
KMBU	Moulsecoomb & Bevendean	Brighton Kempton	2712	2473	United Reformed Church Hall, Lewes Road, BN2 4EU	2
KMBW	Moulsecoomb & Bevendean	Brighton Kempton	2015	1763	Community Church Hall, Norwich Drive, BN2 4LA	1
KMBX	Moulsecoomb & Bevendean	Brighton Kempton	1982	1780	St Andrew`s Church Hall, Hillside, BN2 4TA	1
KMBY	Moulsecoomb & Bevendean	Brighton Kempton	1290	1110	Moulsecoomb Community Leisure Centre, Moulsecoomb Way, BN2 4PB	1
KQPW	Queen`s Park	Brighton Kempton	1744	1502	Craven Vale Resource Centre, Craven Road, BN2 0FE	1

KQPX	Queen`s Park	Brighton Kemptow n	1810	1567	St Luke`s Church, Queen`s Park Road, BN2 9ZB	1
KQPY	Queen`s Park	Brighton Kemptow n	1731	1439	Barnard Community Centre, St John`s Mount, Mount Pleasant, BN2 0JP	1
KQPZ	Queen`s Park	Brighton Kemptow n	1681	1461	Millwood Community Centre, Nelson Row, Carlton Hill, BN2 9QG	1
KRSW	Rottingdean & West Saltdean	Brighton Kemptow n	4587	3600	St Nicholas Church Hall, Saltdean Vale, BN2 8HA	3
KRSX	Rottingdean & West Saltdean	Brighton Kemptow n	1844	1459	Rottingdean Public Hall, Park Road, BN2 7HL	1
KRSY	Rottingdean & West Saltdean	Brighton Kemptow n	874	661	Longhill Sports Centre, Falmer Road, BN2 7FR	1
KRSZ	Rottingdean & West Saltdean	Brighton Kemptow n	939	729	Ovingdean Village Hall, Ovingdean Road, BN2 7BB	1
KWMV	Whitehawk & Marina	Brighton Kemptow n	1026	856	Estate Office Board Room, Brighton Marina, BN2 5UF	1
KWMW	Whitehawk & Marina	Brighton Kemptow n	1738	1404	Robert Lodge Meeting Rooms, Whitehawk Road/Manor Place, BN2 5FG	1
KWMX	Whitehawk & Marina	Brighton Kemptow n	1852	1529	The Manor Gym & Sports Centre, Manor Road, BN2 5EA	1
KWMY	Whitehawk & Marina	Brighton Kemptow n	1678	1372	Whitehawk Library, 179A Whitehawk Road, BN2 5FL	1

KWMZ	Whitehawk & Marina	Brighton Kempton	2020	1673	St Cuthman`s Church, Whitehawk Way, BN2 5HE	1
KWOW	Woodingdean	Brighton Kempton	1998	1632	St Patrick`s Church Hall, Broad Green, BN2 6TB	1
KWOX	Woodingdean	Brighton Kempton	1905	1569	Woodingdean Methodist Church Hall, 117 The Ridgway, BN2 6PA	1
KWOY	Woodingdean	Brighton Kempton	1637	1320	Parish Room, Church of the Holy Cross, Downsway, BN2 6BD	1
KWOZ	Woodingdean	Brighton Kempton	1813	1410	Woodingdean Library, Warren Road, BN2 6BA	1
PCSY	Coldean & Stanmer	Brighton Pavilion	1873	1859	The Meeting House, Sussex University, BN1 9QF	1
PCSZ	Coldean & Stanmer	Brighton Pavilion	2205	1902	St Mary Magdalen Church Hall, Coldean Lane, BN1 9GE	1
PHEW	Hanover & Elm Grove	Brighton Pavilion	1077	927	The Edge Community Centre, 83 Pankhurst Avenue, BN2 9AE	1
PHEX	Hanover & Elm Grove	Brighton Pavilion	3469	3141	Hanover Community Centre, 33 Southover Street, BN2 9UD	2
PHEY	Hanover & Elm Grove	Brighton Pavilion	4839	4390	Elm Grove Primary School, Elm Grove, BN2 3ES	3
PHEZ	Hanover & Elm Grove	Brighton Pavilion	1815	1683	Wagner Memorial (St Martin`s) Hall, Lewes Road, BN2 3HQ	1
PHFW	Hollingdean & Fiveways	Brighton Pavilion	1442	1234	City Gate @ The Dip, 119d Hollingdean Terrace, BN1 7HB	1
PHFX	Hollingdean & Fiveways	Brighton Pavilion	1997	1736	St Richard`s Church Hall, Mountfields, Beal Crescent, BN1 7BU	1
PHFY	Hollingdean & Fiveways	Brighton Pavilion	3840	3355	Stanford Avenue Methodist Church, Southdown Avenue Entrance, BN1 6FD	2
PHFZ	Hollingdean & Fiveways	Brighton Pavilion	3637	3107	St Matthias Church Hall, Hollingbury Park Avenue, BN1 7JQ	2

PMBV	Moulsecoomb & Bevendean	Brighton Pavilion	623	571	United Reformed Church Hall, Lewes Road, BN2 4EU	1
PMBZ	Moulsecoomb & Bevendean	Brighton Pavilion	509	454	Moulsecoomb Public Hall, Lewes Road, BN2 4GA	1
PPHV	Patcham & Hollingbury	Brighton Pavilion	3302	2727	St Thomas More Hall, Braybon Avenue, BN1 8HG	2
PPHW	Patcham & Hollingbury	Brighton Pavilion	714	562	Training Centre, Withdean Sports Complex, Tongdean Lane, BN1 5JD	1
PPHX	Patcham & Hollingbury	Brighton Pavilion	2007	1680	Old Boat Community Centre, Carden Park, Carden Hill, BN1 8GN	1
PPHY	Patcham & Hollingbury	Brighton Pavilion	3704	3094	Patcham Methodist Church Hall, Ladies Mile Road, BN1 8QE	2
PPHZ	Patcham & Hollingbury	Brighton Pavilion	1809	1428	Patcham Memorial Hall, 3 Old London Road, BN1 8XR	1
PPPV	Preston Park	Brighton Pavilion	1791	1606	One Church Front Hall, Florence Road, BN1 6DJ	1
PPPW	Preston Park	Brighton Pavilion	2853	2559	Exeter Street Hall, 16-17 Exeter Street, BN1 5PG	2
PPPX	Preston Park	Brighton Pavilion	2025	1757	Church of the Good Shepherd Hall, Dyke Road, BN1 5AE	1
PPPY	Preston Park	Brighton Pavilion	3524	2996	Knoyle Hall, Knoyle Road, BN1 6RB	2
PPPZ	Preston Park	Brighton Pavilion	1100	874	Varndean College, Surrenden Road, BN1 6WQ	1
PREV	Regency	Brighton Pavilion	1653	1477	Brighton Town Hall, Bartholomew Square, BN1 1JA	1
PREW	Regency	Brighton Pavilion	1920	1735	New Venture Theatre, Bedford Place, BN1 2PT	1
PREX	Regency	Brighton Pavilion	1983	1764	St Mary Magdalen Community Centre, 55 Upper North Street, BN1 3FH	1
PREY	Regency	Brighton Pavilion	1941	1698	St Michael`s Community Hall, St Michael`s Place, BN1 3FU	1
PRHX	Round Hill	Brighton Pavilion	1806	1690	Wagner Memorial (St Martin`s) Hall, Lewes Road, BN2 3HQ	1

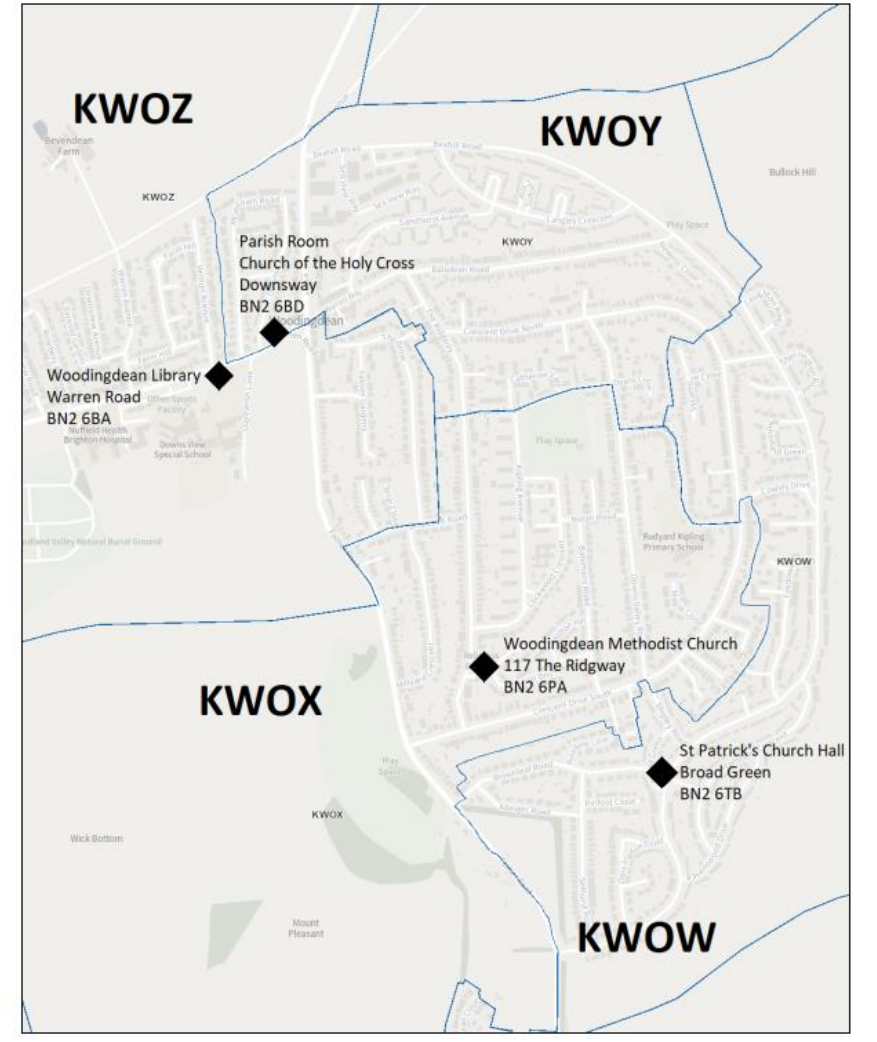
PRHY	Round Hill	Brighton Pavilion	3171	2910	Calvary Evangelical Church, 72 Viaduct Road, BN1 4ND	2
PRHZ	Round Hill	Brighton Pavilion	1604	1449	One Church Front Hall, Florence Road, BN1 6DJ	1
PWHY	Westdene & Hove Park	Brighton Pavilion	1631	1294	Training Centre, Withdean Sports Complex, Tongdean Lane, BN1 5JD	1
PWHZ	Westdene & Hove Park	Brighton Pavilion	1883	1505	Ascension Church Hall, Mill Rise, BN1 5GS	1
PWNX	West Hill & North Laine	Brighton Pavilion	3664	3266	Brighthelm Church and Community Centre, North Road, BN1 1YD	2
PWNY	West Hill & North Laine	Brighton Pavilion	1766	1614	BMECP Centre, 10a Fleet Street, BN1 4ZE	1
PWNZ	West Hill & North Laine	Brighton Pavilion	1812	1665	West Hill Hall, Compton Avenue, BN1 3PS	1

Appendix 2:

Responses to the Full Review of Brighton & Hove Polling Districts and Places Consultation Paper and (Acting) Returning Officer Comment

Ref	Responder comments	Ward (if known)	RO reply
1	Agree with the proposals for the Bevendean area	Moulsecoomb & Bevendean	No reply necessary
2	good	All	No reply necessary
3	I approve the proposals for the Bevendean area.	Moulsecoomb & Bevendean	No reply necessary
4	<p>I would like to officially respond to this consultation in relation to polling districts in Woodingdean ward.</p> <p>The allocation of polling stations is incoherent and confusing for many voters. Many went to the wrong place and had to make a secondary trip to the correct polling place on election day.</p> <ol style="list-style-type: none"> 1. Overall, the Library is fine as a polling station for KWOZ. 2. The Holy Cross Church polling station has some issues. Residents of Downsway found it especially confusing that they could not vote at the polling station which is on their street. 3. St Patricks serves KWOW well generally, however Brownleaf Road, Abinger Road, Donnington Road, Selhurst Road and the closes that abut them would sit more coherently in this polling district. 4. KWOX works well as a central polling district, but could be enhanced by including all closes that join Crescent Drive South being included. <p>More broadly, the distribution of electors is unequal, with the</p>	Woodingdean	<p>The Returning Officer welcomes this constructive feedback and has devised the following redesign of polling districts in Woodingdean:</p>

two polling districts in the south of the ward having hundreds more voters than the two polling districts in the north. An equal distribution between the four would be welcomed.

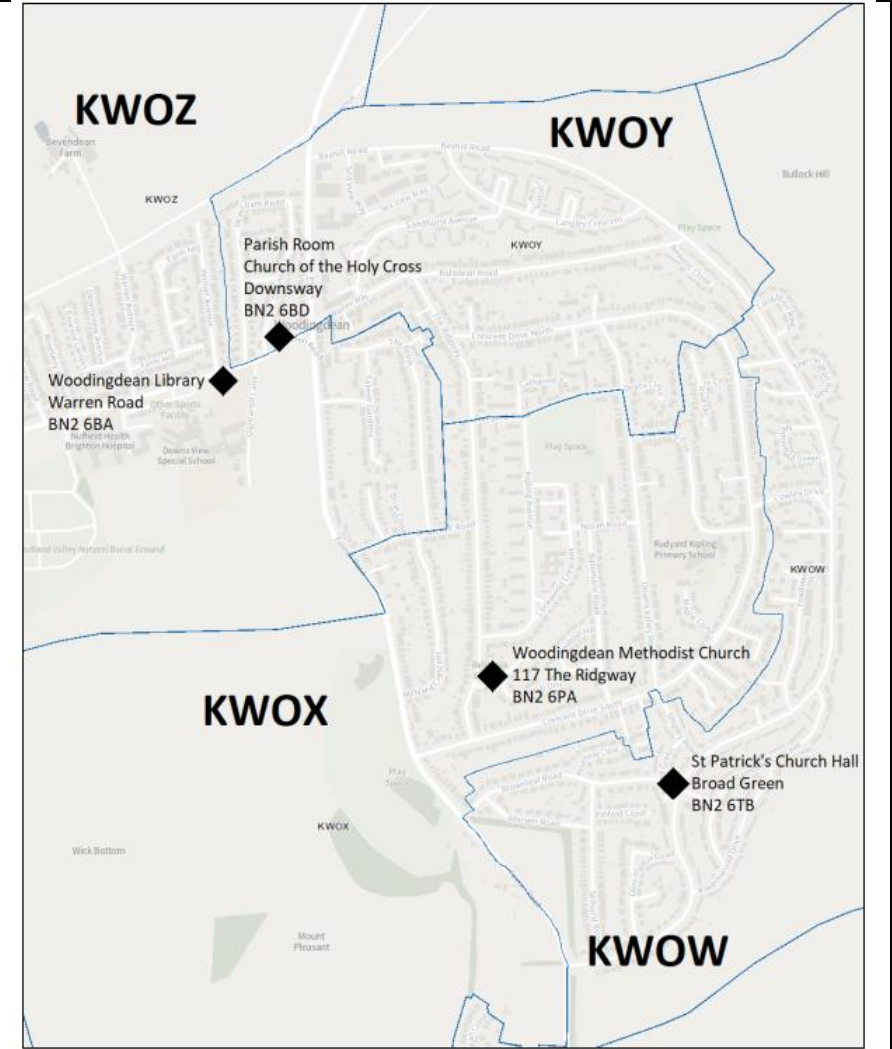


Ref	Responder comments	Ward (if known)	RO reply
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In terms of the unequal distribution of electors between the four polling districts – uneven electorate numbers is common across the city. We have to think about distances to venues and attempts to equalise them will lead to a more incoherent scheme. We try to

Ref	Responder comments	Ward (if known)	RO reply
			keep within ranges that are good for administration. Both our original proposal and those above keep within our usual ranges.
5	no issues - keep as is	All	No reply necessary
6	<p>Also, just a heads up that all parents/carers are receiving a survey via Ping about the proposed closure of the school as a polling station for the next elections.</p> <p>Please fill out the survey if you would like to object to the children missing another day of school, and parents being un</p> <p>You are choosing to put a polling station in Elm Grove Primary School forcing it to close on polling day. My child have already lost copious days of learning through covid and teacher strikes, and parents like me cannot afford to take the day off, for many unpaid, to look after their children who cannot be in school. Please find an alternative site that is not our school. It's unacceptable to compromise our children's education even further and add to stress and financial pressures to parents during the cost of living crisis</p> <p>Of course you can put what you like, you may be for, against or have no opinion. But if you do share the above opinion please make your voice heard, it only takes one minute!</p> <p>Thanks! 🙏 x</p>	Hanover & Elm Grove	<p>The Returning Officer notes the campaign led by Elm Grove Primary School to reject the use of the school as a polling place. Across the responses several alternative sites are suggested - these are not suitable for a range of reasons including: being unavailable, converted into flats, already at the maximum capacity of electors or in an unsuitable and inaccessible location.</p> <p>The Returning Officer has significantly limited the use of schools as polling places in recent years with schools only used when a suitable alternative is unavailable. Due to the scale of responses - an alternative space in Wellington House will be used. This will require Families, Children & Learning staff to be relocated for several days. Wellington House has a significant slope into the access that is being used. However, due to the opposition to the use of Elm Grove Primary School – this issue must be overlooked.</p> <p>The Returning Officer would like to reiterate that electoral legislation is explicit about schools being available for use as polling places free of charge and that at an unscheduled election - schools will have to be used at short notice if other venues are not available. The Council must also be mindful that at national elections Returning Officer expenses are retrospectively reimbursed by the Election Claims Unit of DLUHC. Returning Officers must seek best value and a failure to use available public buildings, such as schools, that are already funded from the Consolidated Fund. may result in the Council having to cover costs incurred by using alternative venues.</p>
7	After all of the teacher strikes and lost education, I couldn't believe it when I heard that the council would propose declining hundreds of children and therefore hours of education for a day in order to use Elm Grove school as a polling station. Parents will all have to fund or find alternative childcare for the day	Hanover & Elm Grove	

Ref	Responder comments	Ward (if known)	RO reply
	<p>putting additional strain and stress on already tight finances and work pressures for covering covid and strike days. Already pressured teachers will also feel added strain to lose another day to achieve their educational goals and targets. Please can you find an alternative site to avoid the impact to so many families in the local area, your voters!</p>		
8	<p>As a parent of children at Elm Grove School I am firmly against the school being used as a polling station. The school would be closed to pupils on polling day which would result in further disruption to the children's education as well as loss of pay for parents such as ourselves who cannot work from home and would have to take time off work.</p>	Hanover & Elm Grove	
9	<p>At the current time while schools are so important to supporting children to be in school and learning, no school should be forced to close to allow polling.</p>	Hanover & Elm Grove	
10	<p>Careful consideration should be given to which council building are used as polling stations. Schools are not appropriate for safeguarding reasons - use of school sites as polling stations also impact on pupil learning and could result in school closures. This would have a significant negative impact for pupils and parent and carers work commitments.</p>	Hanover & Elm Grove	
11	<p>Choosing to put a polling station in Elm Grove Primary School will effectively force it to close to its pupils on polling day. These children have already lost too many days of learning through covid and teacher strikes, and parents will yet again be forced to take the day off to look after their children when they should be at work.</p>	Hanover & Elm Grove	

Ref	Responder comments	Ward (if known)	RO reply
	<p>For many families, this will be unpaid leave, which is not only inconvenient but also unaffordable.</p> <p>Please find an alternative site that is not the school. It's unacceptable to compromise our children's education even further and add to stress and financial pressures to parents during the cost of living crisis.</p>		
12	<p>Closing elm grove school to over 400 pupils and potentially forcing parents to take time off work, possibly unpaid cannot be justified in order to provide step free access to a limited number of voters. Policy states step free where feasible and thus is not feasible. The hall could be used and the rest of the school open for pupils. The council need to make other arrangements for voters unable to manage steps.</p>	Hanover & Elm Grove	
13	<p>Could you please find other venue than school ? Don't you think kids lose enough days from school during Covid and strike teachers last year. Children don't need unnecessary additional days off from school. Parents need also to arrange childcare etc .. surely they are other options to consider.</p>	Hanover & Elm Grove	
14	<p>Dear B&H,</p> <p>We as a family are very surprised about this proposal You are choosing to put a polling station in Elm Grove Primary School forcing it to close on polling day. Our children have already lost many days of learning through covid and teacher strikes. Plus also not all parents cannot afford to take the day off, for many unpaid, to look after their children who cannot be in school. Please find an alternative site that is not our school. It's unacceptable to compromise our children's education in this</p>	Hanover & Elm Grove	

Ref	Responder comments	Ward (if known)	RO reply
	<p>way and also adds stress and financial pressures to parents which is absolute avoidable and unnecessary.</p> <p>Many thanks</p>		
15	<p>Despite your principles listed above, you are proposing to use Elm Grove Primary School as a polling station. Our children have missed an extortionate amount of school already with the pandemic and the teachers strikes. I think it is outrageous that you are now proposing to continue to affect our children's education by implementing yet more forced days off of school. There are plenty of other buildings in the surrounding area that could be used instead of the school. For example; St Joseph's Church on Elm Grove</p>	Hanover & Elm Grove	
16	<p>Don't use elm grove school as I can't afford to take the day off to look after my son.</p>	Hanover & Elm Grove	
17	<p>Don't hold them in schools when this results in the school having to close and children miss out on education</p>	Hanover & Elm Grove	
18	<p>Elm Grive primary school in Brughton is being considered. Usually it is done in the main hall so lessons cam continue, however due to accessibility issues the proposal is for more of the school which mean chdren will be missing school. With the closures during covid the children have missed a substantial amount of school time and are still catching up. To miss more school is unfair on the children and would urge the council to use more appropriate venues so that the school children can continue learning and developing by not missing more days off school.</p>	Hanover & Elm Grove	

Ref	Responder comments	Ward (if known)	RO reply
19	<p>Elm grove primary school is a proposed site a for polling station. Our children have lost numerous days of education and disruption due to covid, strikes and the proposal to have to use this school which would result in further closure is not acceptable.</p> <p>We as parents are carers are not only forced to take unpaid leave to look after our children but the disruption to their routine and education is not acceptable.</p> <p>Please find an alternative site.</p>	Hanover & Elm Grove	
20	<p>Elm Grove School Hall is a functioning part of the school within the school. Using this space will interrupt their education and quite frankly I feel the safeguarding of the children is not being taken into consideration by the council. It causes problematic pick up and drop offs as children have to go different ways to their normal day. I feel there are ample halls church halls and community centres in the area that should allow the schools to be unused and for Elm Grove to continue the childrens education in a safe environment.</p>	Hanover & Elm Grove	
21	<p>Elm grove school should not be used, this is a safeguarding risk to students as although the inner doors can be locked the main gates are still open allowing anyone to venture the grounds. I also feel that students miss out on their after school activities that have to cancel due to the hall being used.</p>	Hanover & Elm Grove	
22	<p>Hello, just a heads up that all parents/carers are receiving a survey via Ping about the proposed closure of the school as a polling station for the next elections.</p> <p>Please do not put a polling station in Elm Grove Primary School forcing it to close on polling day. Our children have already lost copious days of learning through covid and teacher</p>	Hanover & Elm Grove	

Ref	Responder comments	Ward (if known)	RO reply
	<p>strikes, and parents cannot afford to take the day off, for many unpaid, to look after their children who cannot be in school. Please find an alternative site that is not our school. It's unacceptable to compromise our children's education even further and add to stress and financial pressures to parents during the cost of living crisis.</p>		
23	<p>How on Earth can this even be considered closing elm grove school to allow voting. Kids have missed enough school with strikes and covid. There are enough halls and huge areas to open use for polling stations. Brighton Center Hanover community Center Phoenix Center Etc</p>	Hanover & Elm Grove	
24	<p>I agree that schools should not be used especially if it causes them to close, leading to lost learning time.</p>	Hanover & Elm Grove	
25	<p>I am strongly against the proposed changes to the polling station at Elm grove primary school meaning the school would have to close to children. Our children have missed enough school due to covid, and parents having to find childcare which can be costly either paying for childcare or missing work and not being paid during the cost of living crisis.</p>	Hanover & Elm Grove	
26	<p>I am very much AGAINST using Elm Grove school as a polling station. It is unfair and unjust to displace over 400 pupils to use the school as a polling station. Not only will it affect their education but it will cause parents to have to take time off work, potentially unpaid. It's absolutely absurd to do this rather than just use a church hall or something. Find somewhere else please.</p>	Hanover & Elm Grove	

Ref	Responder comments	Ward (if known)	RO reply
27	I am very unhappy to hear that Elm Grove primary school in Brighton may ne used as polling Station and that the school may have to close on these dates. The children have misses huge amounts of their learning due to covid and strikes. More time away from their education is totally unacceptable. It also puts a huge pressure on parents who need to work, especially during this cost of living crisis.	Hanover & Elm Grove	
28	I disagree with using schools as polling stations if it means the school has to close for the day. The children have had so much disruption and as a working single parent it is so hard to take time off work to cover all the closures from strikes etc	Hanover & Elm Grove	
29	I do not agree that Elm Grove school should be forced to close for polling day. This is totally unacceptable. The children at Elm Grove school have already lost countless days through Covid and teachers strikes. This will result in further lost learning which cannot be re-couped and working parents having to take time off. As a single self employed parent this results in significant loss of income for me which of course also impacts my child. Please find locations other than primary schools to hold the elections.	Hanover & Elm Grove	
30	I do not agree to the council using Elm Grove primary school as a polling station. This is extremely disruptive to children's learning and for working parents trying to find (and likely have to pay) for childcare. It is not fair to children or families. Alternative sites, not schools, should be used for polling stations and schools should not close.	Hanover & Elm Grove	
31	I do not agree with Elm grove primary school being used as a polling station. My understanding is that because of the need for disabled access, the whole school would need to be closed	Hanover & Elm Grove	

Ref	Responder comments	Ward (if known)	RO reply
	<p>for the duration. This will further disrupt the education of a cohort whose education has already been severely impacted by the pandemic, with very little in the way of catch-up help or funding. Furthermore there are other venues that could be used, making this proposed disruption unnecessary. I don't know whose idea it was to suggest EGPS as a polling station, however it is clearly unsuitable given the disruption to education it will cause.</p>		
32	<p>I do not agree with Elm Grove Primary School being used unless it is the main hall only and the school day can continue on the polling day. I do not agree with other areas of the school being used as this means the school will be closed and children will lose more school days especially after Covid closures</p>	Hanover & Elm Grove	
33	<p>I do not agree with the use of a school that would have to be entirely closed for the use as a polling station. Specifically Elm Grove Primary School, as that is where my child attends but any school that would have to close for a whole day. I feel that is not an appropriate suggestion or choice.</p> <p>Our children have already lost copious days of learning through covid and teacher strikes, and parents cannot afford to take the day off, for many unpaid, to look after their children who cannot be in school. Please find an alternative site that is not our school. It's unacceptable to compromise our children's education even further and add to stress and financial pressures to parents during the cost of living crisis. School is a safe haven for lots of children where they are heard, nurtured and in some cases the only time they are ensured a nutritious hot meal. Taking that away from vulnerable children in</p>	Hanover & Elm Grove	

Ref	Responder comments	Ward (if known)	RO reply
	particular, even for a day, is really not acceptable in any way shape or form.		
34	I do not agree with the use of Elm Grove Primary School as a polling station. This either causes loss of learning for pupils and puts those already struggling in a difficult situation or it allows anyone to be in the school which is a safeguarding risk. There are plenty of other sites in and around the school such as Wagner Hall on Lewes Road, St Joseph's Hall, Brighton General Hospital or the Hanover Centre.	Hanover & Elm Grove	
35	I do not feel my child should loose out on another day of school, she is at Elm Grove school which have had closures for reasons including strikes in this last year. The building around the corner (Wellington house) was used in the last election and is far less disruptive as most of the staff from the offices can work from home. I work in the day centre end of that building and we were not disrupted. Many thanks.	Hanover & Elm Grove	
36	<p>I do not see the justification in using Elm Grove Primary School as the polling place for district PHEY. It is not easily accessible and will require either a partial or full closure of the school which will impact learning, and send the wrong message to parents and children that school is optional. This is not in alignment with the national focus on school attendance.</p> <p>I do not see why the current building in Milton Road which has been used successfully for many years does not continue in use, or alternative buildings such as Wellington House, or the dance studio on Whippingham Road are not used. These are all more accessible and will have no impact on children's education.</p>	Hanover & Elm Grove	

Ref	Responder comments	Ward (if known)	RO reply
37	<p>I do not support Elm Grove Primary school being used as a polling station. This will force the school to close to its pupils. This I do not support one but based on the large amount of days missed for our children already due to covid and strikes. We as parents are struggling and another day off work at such tight times is just not achievable. I for one - cannot afford to take another day off work. There must be other building across the city suitable to use as a polling station - treat her than to close the school! Not to mention the stress on the parents and caters to facilitate such a decision. Many thanks, Cat Gotts</p>	Hanover & Elm Grove	
38	<p>I do not understand why schools are required for polling stations when there are numerous churches, town halls as well as the Brighton Centre that could be put to better use. Closing schools when children are already catching up due to school closures in Lockdown is absolutely not necessary.</p>	Hanover & Elm Grove	
39	<p>I don't agree with choosing to put a polling station in Elm Grove Primary School (or any other schools) if it will force it to close on polling day.</p> <p>Our children have already lost copious days of learning through covid and teacher strikes, and parents cannot afford to take time off work, which will be unpaid, to look after their children who cannot be in school.</p> <p>Please find an alternative site that does not require closing schools.</p> <p>Maybe in a pub???</p>	Hanover & Elm Grove	

Ref	Responder comments	Ward (if known)	RO reply
40	<p>I don't like the sound of using Elm grove primary school as a polling station as we have been advised that it will now mean the school has to close on polling days. They have had enough time off school already with Covid and teacher strikes. While it was only in the hall and they could keep it open it was fine however if the changes mean the whole school has to close on polling days I think an alternative venue should be looked for. It is difficult for working families to have to cover school closures.</p>	Hanover & Elm Grove	
41	<p>I don't understand why the council are forcing Elm Grove school to close on polling days. I am totally against this decision. It will have many negative effects and there must be other alternatives such as installing temporary ramps for disabled access??</p> <p>Our children have already lost copious days of learning through covid and teacher strikes, and parents cannot afford to take the day off, for many unpaid, to look after their children who cannot be in school. Please find an alternative site that is not our school. It's unacceptable to compromise our children's education even further and add to stress and financial pressures to parents during the cost of living crisis.</p>	Hanover & Elm Grove	
42	<p>I don't want my child school to be closed on top of teacher strikes as we I am self employed and will lose money. The council cannot cause a primary school to close</p>	Hanover & Elm Grove	
43	<p>I don't think it's acceptable to close elm grove school to make it a pooling station. So the children miss out on learning and a day at school and also forcing parents to to take time of work to look after them as they can't go to school!</p>	Hanover & Elm Grove	

Ref	Responder comments	Ward (if known)	RO reply
44	I don't want my child to miss her education and also I have to work.	Hanover & Elm Grove	
45	I feel the children have missed enough education throughout covid, and teacher strikes. If your going to go ahead with this proposal don't then have the audacity to charge parents for taking kids on holiday! Most parents can't afford to take holidays in the half terms, but it's ok to miss school when it suits teachers or the government?	Hanover & Elm Grove	
46	I oppose to having elm grove a school closed for another day in order to be used as a polling station. Children have already lost so much learning due to strikes etc, that this would be unfair to lose another day.	Hanover & Elm Grove	
47	I strongly disagree with the proposal to use elm grove school as a polling station, unless this can be done without disrupting the children's school day. Our children have undergone significant disruption to their schooling, and it has been difficult for parents to factor the additional childcare burden as well. In the past the school has been used as a polling station without closing the school.	Hanover & Elm Grove	
48	I strongly object to you choosing to put a polling station in Elm Grove Primary School forcing it to close on polling day. Our children have already lost copious days of learning through covid and teacher strikes, and parents cannot afford to take the day off, for many unpaid, to look after their children who cannot be in school. Please find an alternative site that is not our school. It's unacceptable to compromise our children's education even	Hanover & Elm Grove	

Ref	Responder comments	Ward (if known)	RO reply
	further and add to stress and financial pressures to parents during the cost of living crisis.		
49	<p>I strongly oppose Elm Grove school being used as a polling station. The children at this school have had their schooling severely impacted by recent school closures due to teacher strikes and for many covid closures.</p> <p>I think it is irresponsible to use a school for this purpose forcing children to miss vital education hours and unfair to expect parents to further provide additional childcare when their own careers have already been compromised from previous strikes. I believe that the area has many suitable alternatives that do not target a child's access to education.</p>	Hanover & Elm Grove	
50	I strongly request Elm Grove Primary school in Hanover is not used as a polling station! The current student population has already lost a lot of school time due to Covid and teacher strikes and as a family with two working parents we struggle with covering childcare as it is.	Hanover & Elm Grove	
51	I support the use of elm grove school as a polling place, as long as a ramp can be provided for disabled access. Without this the school will need to close -which seems unreasonable.	Hanover & Elm Grove	
52	I think after the loss of learning through Covid, and via the teachers strikes, on top of the financial strain both the strikes and Covid has caused all families it seems totally unacceptable and unnecessary to hold any polling stations at schools. Why you cannot use the many empty churches, council buildings that haven't fully reopened since Covid, the Brighton centre and even universities where they have a much larger area that can be used, as well as town / church halls, and even the	Hanover & Elm Grove	

Ref	Responder comments	Ward (if known)	RO reply
	shopping mall where Debenhams sat which lies empty are just a few places that could be used without cost or disruption to our children's learning and the families financial loss. Utter disgrace from the council yet again!		
53	I think closing the school is not the right approach especially when my son is in year 4 and from the beginning of the reception year, his learning has been disrupted by Covid for two years and he and his years are still recovering and are still behind with their learning. I believe closing the school for polling station is not enough to disturb kids learning and especially in this economy when people work because the life is so hard. Taking a day off or without pay or paying someone else for a day can affect families more than anyone can think about it.	Hanover & Elm Grove	
54	I think where possible, after so much time out of school/work, Elm Grove should not be used as a polling station and Hanover community centre be used instead. If not already! I cannot take more time off to have my son if the school has to close	Hanover & Elm Grove	
55	I would like to question your choice of Elm Grove primary school as polling station. Our children lost so many days of learning either due to covid or school strikes. Now we will be facing more days at home. When are our children or us the parents are taken into consideration? For some of us leave from work is unpaid and others have no family around to offer childcare. Is there any other building that can be used as a polling station in the area? Seems the easy solution to just lose more school for anyone not affected by this but it is incredibly unfair for pupils and parents of the school to deal with more school closures.	Hanover & Elm Grove	

Ref	Responder comments	Ward (if known)	RO reply
56	I would prefer that Elm Grove School isn't a polling station, it seems unnecessary to close a school for the day when there are less disruptive alternatives that won't negatively affect both pupils and parents.	Hanover & Elm Grove	
57	I'd like to strongly contest the proposal of using Elm Grove school as a polling station as it would require the school to close on those days. The children have already missed so much, so I think it would very sad to see them miss even more due to the school being used for voting.	Hanover & Elm Grove	
58	It's true to say the children have missed enough school with covid. I feel their presence in school as much as possible is essential	Hanover & Elm Grove	
59	It's really important for access to polling stations be ensured for all residents. However, if the use of a school means the school must close, I think this option should be the very last resort of even disregarded entirely to avoid further disruption to learning for children.	Hanover & Elm Grove	
60	My child attends elm grove which is proposed to be a polling station. I am not happy for the school to be closed to accommodate this. My child has missed enough school thanks to COVID's and teachers strikes and I cannot arrange ad hoc childcare. I think you need to find an alternative venue.	Hanover & Elm Grove	
61	My child goes to Elm Grove and I will be really unhappy if the school is closed. Whilst I appreciate how important it is to vote, I don't want him to miss more school after the strikes. It's not ok. Use the Hanover Centre or somewhere that's not a school. At Martins Church??	Hanover & Elm Grove	

Ref	Responder comments	Ward (if known)	RO reply
62	<p>My daughter attends Elm Grove Primary School. I strongly object to the use of the school for a polling station insofar as it means that the school will have to close for the day to accommodate this. I have been informed by the school that it is not possible to shut the main hall off from the rest of the school - and that because of safeguarding concerns the school must close. Surely it must be possible for the council, or the school, to supply staff who can monitor the entrances/exits. Has this been investigated? If it's not possible to do this, an alternative site should be found. There is a large church at the bottom of Elm Grove. Children's education should not be compromised.</p>	Hanover & Elm Grove	
63	<p>My understanding is that Elm Grove school is to be proposed as a polling station. In the past the main hall was used as this wouldn't impact the rest of the school, however this is no longer possible due to disabled access. This means that the school would have to close certain areas during any elections, which would then impact the children's learning as well as the parents and carers. As a parent who's child attends Elm Grove I do not think this is acceptable, especially after the number of strike days that also impacted the children's learning and lead to parents like myself having to rearrange work and take leave in order to cater for the disruptions. I appreciate these 2 things are not linked but the end result is the same... the children and their adults are the ones who have to organise themselves around the disruption. Please find an alternate polling station.</p>	Hanover & Elm Grove	
64	<p>No I do not agree The children have lost enough valuable schooling with strikes etc this should not be done in their time</p>	Hanover & Elm Grove	

Ref	Responder comments	Ward (if known)	RO reply
65	<p>Please can Elm Grove ward use St. Joseph's church hall (Milton Road) for a polling station instead of Elm Grove school. If the school is used then the school has to close and this means the parents have to find alternative childcare or take the day off work, which comes at extra financial cost. If the church hall above is used this means the school does not have to close and parents can work as usual.</p>	Hanover & Elm Grove	
66	<p>Please can you avoid using Elmgrove Primary School. The children have been impacted by teacher strikes, and obviously time off due to Covid further back. They need to be in school Learning I am concerned about them falling behind.</p> <p>In addition closing the school puts pressure on parents to find care for their children or take some off from work. It's very hard to manage. Please avoid using the school. Hanover Community Centre is near by and St Martins Church which could accommodate this.</p>	Hanover & Elm Grove	
67	<p>Please could the Elm Grove polling station not cause the closure of the school.</p> <p>The effect is huge for all of the families involved. Please consider Hanover Centre or a local church as a venue instead.</p>	Hanover & Elm Grove	
68	<p>Please do not necessitate closing Elm Grove primary school due to access requirements compromising the safeguarding of children. If the main hall is not wheelchair accessible, please consider funding adjustments so the hall can be accessed without needing to close the school. Your requirements above state you want to avoid schools where possible, and the idea of closing a school on polling days is really dreadful.</p>	Hanover & Elm Grove	

Ref	Responder comments	Ward (if known)	RO reply
69	Please do not use Elm Grove Primary School for a polling station. This will result in the school having to close for the duration and will result in hundreds of families incurring additional childcare costs. For a family with two children this could be £100 per day. This is deeply unfair when other venues could be used without this financial burden being passed onto families.	Hanover & Elm Grove	
70	Please do not use Elm Grove School - closure for pupils has a great effect - both the education of the pupils and loss of earnings for hard working parents. Since Covid. teachers strikes and the cost of living crisis it is vitally important no more destruction and unnecessary school closures when other empty community & leisure centres and church halls can be used in place.	Hanover & Elm Grove	
71	Please do not use Elm Grove School for a polling station if this results in school closure. Our kids have missed enough days of school with the strikes and it is unfair for them to give up more days because BHCC can't find a suitable location. It also puts pressure on the parents to provide childcare on these days and I personally would need to take unpaid leave to cover this. It doesn't feel right. Please do not use our school as a polling station.	Hanover & Elm Grove	
72	Please don't use elm grove primary school (or any other school) - it sends a terrible message about the importance of education. The pandemic has created a legacy where it's become acceptable to view school as optional and this would feed that view.	Hanover & Elm Grove	

Ref	Responder comments	Ward (if known)	RO reply
	There is an unused church half way up Bentham road that could be an alternative.		
73	Please don't use Elm Grove Primary school as a venue	Hanover & Elm Grove	
74	Please don't use Elm Grove Primary. Our children have experienced enough disruption	Hanover & Elm Grove	
75	Please find an alternative polling station for Elm Grove School. I do not want any further disruption to our children's education.	Hanover & Elm Grove	
76	Please find an alternative to Elm Grove Primary School as I have no child care and my children will miss out on their education.	Hanover & Elm Grove	
77	Please find other places to have the polling station other than Elm Grove school if this means it will need to be closed resulting in loss of learning. There are plenty of other places that can be used in this area.	Hanover & Elm Grove	
78	Please reconsider the use of our school, Elm Grove Primary School as a polling station. Since Covid, and all the teacher strikes our children have already missed so much school. Parents cannot afford to take any more time off work. There are alternative spaces in the area, please please consider these instead of causing even more disruption to hundreds of families in the area.	Hanover & Elm Grove	
79	Previously Elm Grove school hall has been used as a polling station. However, we have heard from the school that now, due to various restrictions, areas of the school will need to be used also which mean that the school will need to be closed due to safe-guarding restrictions. Given the amount of time already	Hanover & Elm Grove	

Ref	Responder comments	Ward (if known)	RO reply
	lost to COVID restrictions, I don't agree with this. We also regularly receive information on how important it is that children attend school - so why are you now proposing to close the school for a day?...		
80	Schools should not be used. Children should not miss any more of their education due to politics.	Hanover & Elm Grove	
81	<p>Suggesting that schools, namely Elm Grove Primary school be used as a polling station in the future election makes a mockery of the stresses that families, children and teaching staff have suffered over the last 3 years.</p> <p>To suggest yet another day of school closure after a year of unprecedented strike action is narrow minded and cruel.</p> <p>Children thrive on consistency and for parents who would have to take yet another day off it is pushing them ever closer to breaking point.</p> <p>There are accessible churches, church halls and community centres from the General hospital all the way to Lewes road so there should be no need to use the school again. We live opposite the school and our polling station was up by the race course. Proof that there are many other places that can and should be used instead of schools.</p>	Hanover & Elm Grove	
82	<p>The Elm Grove and Hannover district must not vote at Elm Grove School, as I understand that this will result in the closing of the school on polling days.</p> <p>This is simply unacceptable. It will result in significant disruption to my 2 children's schooling, in addition to my wife and my working days due to the need to provide Childcare. Across the ward, this will inevitably fall disproportionately on the female population. Ultimately this will also come at</p>	Hanover & Elm Grove	

Ref	Responder comments	Ward (if known)	RO reply
	<p>considerable cost to families which is not acceptable during a cost of living crisis.</p> <p>There are many other facilities capable of being used as polling locations in the Ward. Including Fairlight School which can be used as polling station without the need for the school to close.</p>		
83	<p>The proposal would result in school closures during elections, lost learning and inconvenience for parents/carers</p> <p>You are choosing to put a polling station in Elm Grove Primary School forcing it to close on polling day. Our children have already lost copious days of learning through covid and teacher strikes, and parents cannot afford to take the day off, for many unpaid, to look after their children who cannot be in school. Please find an alternative site that is not our school. It's unacceptable to compromise our children's education even further and add to stress and financial pressures to parents during the cost of living crisis.</p>	Hanover & Elm Grove	
84	<p>The proposed use of Elm Grove Primary school as a polling station does not comply with the stated principle of avoiding use of schools wherever possible. If essential to use the school, the school hall could be made completely accessible through use of a ramp from the car park area down the few steps directly into the hall. Closing the school for a whole day disrupts the education of hundreds of children, including deprived children, and the working lives of their parents, for the sake of ensuring full accessibility for a small handful of electors who do have the option of a postal vote. There is, by contrast, no alternative school option for the school community. If necessary I would suggest the principle of full accessibility</p>	Hanover & Elm Grove	

Ref	Responder comments	Ward (if known)	RO reply
	should be compromised before the principle of avoiding use of schools.		
85	The use of Elm Grove school will be disruptive to children's education due to the need to close the school as they are unable to provide suitable access to a large enough space without disrupting class rooms. A suggested alternative would be st Wilfrids Church.	Hanover & Elm Grove	
86	This proposal involves closing Elm Grove Primary School (Brighton) on polling days. At the moment the school accommodates a polling station using the main hall, allowing the school to safely stay open. Under this proposal different areas of the school will need to be used (to facilitate disabled access) and therefore the school must close. The idea that the school must close for various days in the voting calendar is an outrage. Schools, staff and pupils have lost SO much time in the last three years due to the pandemic, as well as the recent flurry of teacher strikes, to now also have to close for polling station responsibilities is absolutely a step too far. Source venues such as community centres, churches, pubs, libraries before coming for the schools. I absolutely oppose this idea.	Hanover & Elm Grove	
87	Would not support the closure of schools to enable polling stations	Hanover & Elm Grove	
88	You are choosing to put a polling station at elm grove primary school. This will require the school to be closed to its pupils, which is unacceptable and negligent to their needs as students.	Hanover & Elm Grove	
89	You are choosing to put a polling station in elm grove primary school forcing it to close on polling day. Our children have	Hanover & Elm Grove	

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	<p>already lost copious days of learning through covid and teacher strikes, and parents cannot afford to take the day off, for many unpaid, to look after their children who cannot be in school. Please find an alternative site that is not our school. It's unacceptable to compromise our children's education even further and add to stress and financial pressures to parents during the cost of living crisis.</p>		
90	<p>You are choosing to put a polling station in Elm Grove Primary School forcing it to close on polling day. Our children have already lost copious days of learning through covid and teacher strikes, and parents cannot afford to take the day off, for many unpaid, to look after their children who cannot be in school. Please find an alternative site that is not our school. It's unacceptable to compromise our children's education even further and add to stress and financial pressures to parents during the cost of living crisis.</p>	Hanover & Elm Grove	
91	<p>You are choosing to put a polling station in Elm Grove Primary School forcing it to close on polling day. Our children have already lost copious days of learning through covid and teacher strikes, and parents cannot afford to take the day off, for many unpaid, to look after their children who cannot be in school. Please find an alternative site that is not our school. It's unacceptable to compromise our children's education even further and add to stress and financial pressures to parents during the cost of living crisis.</p>	Hanover & Elm Grove	
92	<p>You are choosing to put a polling station in Elm Grove Primary School forcing it to close on polling day. Our children have already lost copious days of learning through covid and teacher strikes, and parents cannot afford to take the day off, for many unpaid, to look after their children who cannot be in school.</p>	Hanover & Elm Grove	

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	Please find an alternative site that is not our school. It's unacceptable to compromise our children's education even further and add to stress and financial pressures to parents during the cost of living crisis.		
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94	You are choosing to put a polling station in Elm Grove Primary School forcing it to close on polling day. Our children have already lost copious days of learning through covid and teacher strikes, and parents cannot afford to take the day off, for many unpaid, to look after their children who cannot be in school. Please find an alternative site that is not our school. It's unacceptable to compromise our children's education even further and add to stress and financial pressures to parents during the cost of living crisis.	Hanover & Elm Grove	
95	You are choosing to put a polling station in Elm Grove Primary School forcing it to close on polling day. Our children have already lost copious days of learning through covid and teacher strikes, and parents cannot afford to take the day off, for many unpaid, to look after their children who cannot be in school. Please find an alternative site that is not our school. It's unacceptable to compromise our children's education even	Hanover & Elm Grove	

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	further and add to stress and financial pressures to parents during the cost of living crisis.		
96	You are choosing to put a polling station in Elm Grove Primary School forcing it to close on polling day. Our children have already lost copious days of learning through covid and teacher strikes, and parents cannot afford to take the day off, for many unpaid, to look after their children who cannot be in school. Please find an alternative site that is not our school. It's unacceptable to compromise our children's education even further and add to stress and financial pressures to parents during the cost of living crisis.	Hanover & Elm Grove	
97	You are choosing to put a polling station in Elm Grove Primary School forcing it to close on polling day. Our children have already lost copious days of learning through covid and teacher strikes, and parents cannot afford to take the day off, for many unpaid, to look after their children who cannot be in school. Please find an alternative site that is not our school.	Hanover & Elm Grove	
98	You are choosing to put a polling station in Elm Grove Primary School forcing it to close on polling day. Our children have already lost copious days of learning through covid and teacher strikes, and parents cannot afford to take the day off, for many unpaid, to look after their children who cannot be in school. Please find an alternative site that is not our school. It's unacceptable to compromise our children's education even further and add to stress and financial pressures to parents during the cost of living crisis	Hanover & Elm Grove	
99	You are choosing to put a polling station in Elm Grove Primary School forcing it to close on polling day. Our children have already lost copious days of learning through covid and teacher	Hanover & Elm Grove	

Ref	Responder comments	Ward (if known)	RO reply
	<p>strikes, and parents cannot afford to take the day off, for many unpaid, to look after their children who cannot be in school. Please find an alternative site that is not our school. It's unacceptable to compromise our children's education even further and add to stress and financial pressures to parents during the cost of living crisis.</p>		
100	<p>You are choosing to put a polling station in Elm Grove Primary School forcing it to close on polling day. Our children have already lost copious days of learning through covid and teacher strikes, and parents cannot afford to take the day off, for many unpaid, to look after their children who cannot be in school. Please find an alternative site that is not our school. It's unacceptable to compromise our children's education even further and add to stress and financial pressures to parents during the cost of living crisis.</p>	Hanover & Elm Grove	
101	<p>You are choosing to put a polling station in Elm Grove Primary School forcing it to close on polling day. Our children have already lost copious days of learning through covid and teacher strikes, and parents cannot afford to take the day off, for many unpaid, to look after their children who cannot be in school. Please find an alternative site that is not our school. It's unacceptable to compromise our children's education even further and add to stress and financial pressures to parents during the cost of living crisis.</p>	Hanover & Elm Grove	
102	<p>You are choosing to put a polling station in Elm Grove Primary School forcing it to close on polling day. Our children have already lost copious days of learning through covid and teacher strikes, and parents cannot afford to take the day off, for many unpaid, to look after their children who cannot be in school. Please find an alternative site that is not our school. It's</p>	Hanover & Elm Grove	

Ref	Responder comments	Ward (if known)	RO reply
	unacceptable to compromise our children's education even further and add to stress and financial pressures to parents during the cost of living crisis.		
103	You are choosing to put a polling station in Elm Grove Primary School forcing it to close on polling day. Our children have already lost copious days of learning through covid and teacher strikes, and parents cannot afford to take the day off, for many unpaid, to look after their children who cannot be in school. Please find an alternative site that is not our school. It's unacceptable to compromise our children's education even further and add to stress and financial pressures to parents during the cost of living crisis.	Hanover & Elm Grove	
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Ref	Responder comments	Ward (if known)	RO reply
106	<p>You are choosing to put a polling station in Elm Grove Primary School forcing it to close on polling day. Our children have already lost copious days of learning through covid and teacher strikes, and parents cannot afford to take the day off, for many unpaid, to look after their children who cannot be in school. I believe that there are other suitable community venues that could be used instead of the school.</p>	Hanover & Elm Grove	
107	<p>You are choosing to put a polling station in Elm Grove Primary School forcing it to close on polling day. Our children have already lost so many days of learning through covid and teacher strikes, and parents cannot afford to take the day off, for many unpaid, to look after their children who cannot be in school. Please find an alternative site that is not our school. It's unacceptable to compromise our children's education even further and add to stress and financial pressures to parents during the cost of living crisis.</p>	Hanover & Elm Grove	
108	<p>You have chosen to put a polling station in Elm Grove Primary School forcing it to close on polling day. This contradicts, in your own words, your intention to "limit the use of schools". Our children have recently lost many days of learning through covid and teacher strikes. Many parents cannot afford to take the day off, for some unpaid, to look after their children who cannot be in school. Please find an alternative site that is not our school. It's unacceptable to compromise our children's education even further and add to stress and financial pressures to parents during the cost of living crisis.</p>	Hanover & Elm Grove	

Appendix 3 - Final Scheme of Polling Places

Polling District	Constituency	Ward	Polling Place
HBAY	Hove	Brunswick & Adelaide	Baptist Church Hall, Holland Road, BN3 1JN
HBAZ	Hove	Brunswick & Adelaide	Cornerstone Community Centre, Church Road, BN3 2FL
HCHY	Hove	Central Hove	Hove Town Hall, Norton Road, BN3 3BQ
HCHZ	Hove	Central Hove	Hove Library, 182 - 186 Church Road, BN3 2EG
HGOV	Hove	Goldsmid	Brighton & Hove Progressive Synagogue, 6 Lansdowne Road, BN3 1FF
HGOW	Hove	Goldsmid	St Luke`s Prestonville, 64 Old Shoreham Road, Brighton, BN1 5DD
HGOX	Hove	Goldsmid	All Saints Church Hall, All Saints Church, Eaton Road, BN3 3QE
HGOY	Hove	Goldsmid	Hove Rugby Club Pavilion, Hove Recreation Ground, Shirley Drive, BN3 6NQ
HGOZ	Hove	Goldsmid	Vallance Community Centre, Conway Court, Sackville Road, BN3 3WR
HHKV	Hove	Hangleton & Knoll	St Richard`s Community Centre, Egmont Road, BN3 7FP
HHKW	Hove	Hangleton & Knoll	Hounsom Memorial Church Hall, 200 Nevill Avenue, BN3 7NG
HHKX	Hove	Hangleton & Knoll	At the Oasis, Hangleton Way, BN3 8EQ

Polling District	Constituency	Ward	Polling Place
HHKY	Hove	Hangleton & Knoll	Hangleton Community Centre, Harmsworth Crescent, BN3 8BW
HHKZ	Hove	Hangleton & Knoll	St Helen`s Church Hall, Hangleton Way, BN3 8ER
HNPX	Hove	North Portslade	Hill Park School (Lower Site), Foredown Road, BN41 2FU
HNPY	Hove	North Portslade	Community Hall, Downland Court, Stonery Road, BN41 2PS
HNPZ	Hove	North Portslade	Church of the Good Shepherd Hall, Stanley Avenue, BN41 2WH
HREZ	Hove	Regency	Brighton & Hove Progressive Synagogue, 6 Lansdowne Road, BN3 1FF
HSPX	Hove	South Portslade	Scout Headquarters, Vale Park, (Sw Corner), BN41 1DE
HSPY	Hove	South Portslade	Portslade Town Hall, Victoria Road, BN41 2YF
HSPZ	Hove	South Portslade	St Nicolas Parish Centre, South Street, BN41 2LE
HWHV	Hove	Westdene & Hove Park	Bishop Hannington Youth & Community Centre, 38 Holmes Avenue, Hove, BN3 7LD
HWHW	Hove	Westdene & Hove Park	Hove Rugby Club Pavilion, Hove Recreation Ground, Shirley Drive, BN3 6NQ
HWHX	Hove	Westdene & Hove Park	St George`s Hall, Court Farm Road, Hove, BN3 7QR
HWIX	Hove	Wish	Wish Road Pavilion, Aldrington Recreation Ground, Wish Road, BN3 4LN
HWIY	Hove	Wish	Sanders House Communal Room, Ingram Crescent West, BN3 5NW

Polling District	Constituency	Ward	Polling Place
HWIZ	Hove	Wish	St Leonard`s Church Hall, (formerly Glebe Villas Hall), Glebe Villas, BN3 5SL
HWPY	Hove	Westbourne & Poets` Corner	Hove Museum and Art Gallery, 19 New Church Road, BN3 4AB
HWPZ	Hove	Westbourne & Poets` Corner	Holy Cross Church Hall, Tamworth Road, BN3 5FJ
PCSY	Brighton Pavilion	Coldean & Stanmer	The Meeting House, Sussex University, BN1 9QF
PCSZ	Brighton Pavilion	Coldean & Stanmer	St Mary Magdalen Church Hall, Coldean Lane, BN1 9GS
PHEW	Brighton Pavilion	Hanover & Elm Grove	The Edge Community Centre, 83 Pankhurst Avenue, Brighton, BN2 9AE
PHEX	Brighton Pavilion	Hanover & Elm Grove	Hanover Community Centre, 33 Southover Street, BN2 9UD
PHEY	Brighton Pavilion	Hanover & Elm Grove	Wellington House, Wellington Street, Brighton, BN2 3AX
PHEZ	Brighton Pavilion	Hanover & Elm Grove	Wagner Memorial (St Martin`s) Hall, Lewes Road, BN2 3HQ
PHFW	Brighton Pavilion	Hollingdean & Fiveways	City Gate @ The Dip, 119d Hollingdean Terrace, BN1 7HB
PHFX	Brighton Pavilion	Hollingdean & Fiveways	Hollingdean Community Centre, Thompson Road, BN1 7BH
PHFY	Brighton Pavilion	Hollingdean & Fiveways	Stanford Avenue Methodist Church, Southdown Avenue Entrance, BN1 6FD
PHFZ	Brighton Pavilion	Hollingdean & Fiveways	St Matthias Church Hall, Hollingbury Park Avenue, BN1 7JQ
PMBV	Brighton Pavilion	Moulsecoomb & Bevendean	United Reformed Church Hall, Lewes Road, BN2 4EU

Polling District	Constituency	Ward	Polling Place
PMBZ	Brighton Pavilion	Moulsecoomb & Bevendean	Moulsecoomb Public Hall, Lewes Road, BN2 4GA
PPHV	Brighton Pavilion	Patcham & Hollingbury	St Thomas More Hall, Braybon Avenue, BN1 8HG
PPHW	Brighton Pavilion	Patcham & Hollingbury	Training Centre (formerly Minor Club House), Withdean Sports Complex, Tongdean Lane, BN1 5JD
PPHX	Brighton Pavilion	Patcham & Hollingbury	Old Boat Community Centre, Carden Park, Carden Hill, BN1 8GN
PPHY	Brighton Pavilion	Patcham & Hollingbury	Patcham Methodist Church Hall, Ladies Mile Road, BN1 8QE
PPHZ	Brighton Pavilion	Patcham & Hollingbury	Patcham Memorial Hall, 3 Old London Road, BN1 8XR
PPPV	Brighton Pavilion	Preston Park	One Church, Florence Road, BN1 6DJ
PPPW	Brighton Pavilion	Preston Park	Exeter Street Hall, 16-17 Exeter Street, BN1 5PG
PPPX	Brighton Pavilion	Preston Park	Church of the Good Shepherd Hall, Dyke Road, BN1 5AE
PPPY	Brighton Pavilion	Preston Park	Knogle Hall, Knogle Road, BN1 6RB
PPPZ	Brighton Pavilion	Preston Park	Varndean College, Surrenden Road, BN1 6WQ
PREV	Brighton Pavilion	Regency	Brighton Town Hall, Bartholomew Square, BN1 1JA
PREW	Brighton Pavilion	Regency	New Venture Theatre, Bedford Place, BN1 2PT
PREX	Brighton Pavilion	Regency	St Mary Magdalen Community Centre, 55 Upper North Street, BN1 3FH

Polling District	Constituency	Ward	Polling Place
PREY	Brighton Pavilion	Regency	St Michael`s Community Hall, St Michael`s Place, BN1 3FU
PRHX	Brighton Pavilion	Round Hill	Wagner Memorial (St Martin`s) Hall, Lewes Road, BN2 3HQ
PRHY	Brighton Pavilion	Round Hill	Calvary Evangelical Church, (Main Entrance), 72 Viaduct Road, BN1 4ND
PRHZ	Brighton Pavilion	Round Hill	One Church, Florence Road, BN1 6DJ
PWHY	Brighton Pavilion	Westdene & Hove Park	Training Centre (formerly Minor Club House), Withdean Sports Complex, Tongdean Lane, BN1 5JD
PWHZ	Brighton Pavilion	Westdene & Hove Park	Ascension Church Hall, Mill Rise, BN1 5GS
PWNX	Brighton Pavilion	West Hill & North Laine	Brighthelm Church and Community Centre, North Road, BN1 1YD
PWNY	Brighton Pavilion	West Hill & North Laine	BMECP Centre, 10a Fleet Street, BN1 4ZE
PWNZ	Brighton Pavilion	West Hill & North Laine	West Hill Hall, Compton Avenue, BN1 3PS
KCSW	Brighton Kemptown	Coldean & Stanmer	Sports Pavilion, University of Brighton, Village Way, BN1 9PH
KCSX	Brighton Kemptown	Coldean & Stanmer	St George`s Hall, Newick Road, BN1 9JN
KKTX	Brighton Kemptown	Kempton	The Spire, St Mark`s Chapel, Eastern Road, BN2 5JN
KKTY	Brighton Kemptown	Kempton	St George`s Community Centre (Kemp Town Crypt), St. George`s Church, St. George`s Road, BN2 1ED
KKTZ	Brighton Kemptown	Kempton	St Mary`s Hall (formerly St Mary`s Church House), 61 St James`s Street, BN2 1PR

Polling District	Constituency	Ward	Polling Place
KMBT	Brighton Kemptown	Moulsecoomb & Bevendean	Meadowview Community Centre, Meadowview, BN2 4NF
KMBU	Brighton Kemptown	Moulsecoomb & Bevendean	United Reformed Church Hall, Lewes Road, BN2 4EU
KMBW	Brighton Kemptown	Moulsecoomb & Bevendean	Community Church Hall, Norwich Drive, BN2 4LA
KMBX	Brighton Kemptown	Moulsecoomb & Bevendean	St Andrew`s Church Hall, Hillside, BN2 4TA
KMBY	Brighton Kemptown	Moulsecoomb & Bevendean	Moulsecoomb Community Leisure Centre, Moulsecoomb Way, Brighton, BN2 4PB
KQPW	Brighton Kemptown	Queen`s Park	Craven Vale Resource Centre, Craven Road, BN2 0FE
KQPX	Brighton Kemptown	Queen`s Park	St Luke`s Church, Queen`s Park Road, BN2 9ZB
KQPY	Brighton Kemptown	Queen`s Park	Barnard Community Centre, St John`s Mount, Mount Pleasant, BN2 0JP
KQPZ	Brighton Kemptown	Queen`s Park	Millwood Community Centre, Nelson Row, Carlton Hill, BN2 9QG
KRSW	Brighton Kemptown	Rottingdean & West Saltdean	St Nicholas Church Hall, Saltdean Vale, BN2 8HA
KRSX	Brighton Kemptown	Rottingdean & West Saltdean	Rottingdean Public Hall, Park Road, BN2 7HL
KRSY	Brighton Kemptown	Rottingdean & West Saltdean	Longhill Sports Centre, Falmer Road, BN2 7FR
KRSZ	Brighton Kemptown	Rottingdean & West Saltdean	Ovingdean Village Hall, Ovingdean Road, Ovingdean, BN2 7BB
KWMV	Brighton Kemptown	Whitehawk & Marina	Estate Office Board Room, Brighton Marina, BN2 5UF

Polling District	Constituency	Ward	Polling Place
KWMW	Brighton Kemptown	Whitehawk & Marina	Robert Lodge Meeting Rooms, Whitehawk Road/Manor Place, BN2 5FG
KWMX	Brighton Kemptown	Whitehawk & Marina	The Manor Gym & Sports Centre, Manor Road, BN2 5EA
KWMY	Brighton Kemptown	Whitehawk & Marina	Whitehawk Library, (Accessible from Crossbush Road and Whitehawk Way), 179A Whitehawk Road, BN2 5FL
KWMZ	Brighton Kemptown	Whitehawk & Marina	St Cuthman`s Church, Whitehawk Way, BN2 5HE
KWOW	Brighton Kemptown	Woodingdean	St Patrick`s Church Hall, Broad Green, BN2 6TB
KWOX	Brighton Kemptown	Woodingdean	Woodingdean Methodist Church Hall, 117 The Ridgway, Brighton, BN2 6PA
KWOY	Brighton Kemptown	Woodingdean	Parish Room, Church of the Holy Cross, Downsway, BN2 6BD
KWOZ	Brighton Kemptown	Woodingdean	Woodingdean Library, Warren Road, Brighton, BN2 6BA

Brighton & Hove City Council

Strategy, Finance and City Regeneration Committee

Agenda Item 89

Subject: New Swimming Pool at Withdean Sports Complex and pool provision in the East of the City

Date of meeting: Culture, Heritage, Sport, Tourism & Economic Development Committee - 18 January 2024
Strategy, Finance and City Regeneration Committee - 25 January 2024

Report of: Executive Director, Economy, Environment & Culture

Contact Officer: Name: Mark Fisher
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Ward(s) affected: All Wards

For general release

1. Purpose of the report and policy context

- 1.1 The Sports Facilities Investment Plan 2021-31 (SFIP) was approved by Policy & Resources Committee in June 2021, and was published and launched as the strategic plan for investing in, improving and providing financially sustainable indoor sports facilities across the city.
- 1.2 One of the key findings was that the current demand for pool water in the city exceeds supply, and that any closure or loss of a facility will result in a significant pressure on the remaining facilities for use for the public and club swimming. Work has been undertaken since the launch of the SFIP in 2021, and will continue, to carefully consider the options for increasing the amount of pool/water space in the city to meet the current and future needs.
- 1.3 This report sets out a detailed proposal that has now been developed to add a community swimming pool at the city's 'North Hub', Withdean Sports Complex, which will not only address the shortfall of pool water space available in the city but will also act as a mitigation should the council be forced to consider a temporary or permanent closure of the current King

Alfred Leisure Centre pools given the ongoing challenges relating to its age and condition.

2. Recommendations

That Committee;

- 2.1 Notes the importance of addressing the shortfall of pool water space in the city.
- 2.2 Agrees that officers should continue to explore the feasibility of where and how new pool water space is developed and delivered in the East of the city, (as set out in paragraph 3.35).

Recommends that the Strategy, Finance, and City Regeneration Committee

- 2.3 Agrees in principle to the development of a new swimming pool at Withdean Sports Complex, as set out in paragraph 3.18.
- 2.4 Agrees the provision of £451,000 (via capital borrowing) to complete detailed design and survey work and to achieve planning consent.
- 2.5 Authorises the Executive Director Economy, Environment and Culture to take all steps necessary to procure and award the contracts for the design work.
- 2.6 Agrees that a further report is brought back to the Strategy, Finance and City Regeneration Committee once the design work is completed to approve the progression of the project to implementation and the additional borrowing required for the remaining capital cost to deliver a new facility.

3. Context and background information

- 3.1 In addition to the SFIP, the strategic need for additional pool water space in the city is supported by the following relevant local and national strategies; BHCC City Plan Part 1 & 2, BHCC Sport & Physical Activity Strategy due to be launched in 2024, Brighton & Hove Health & Wellbeing Strategy 2019-2030, Sport England's Uniting the Movement Strategy and Swim England's Access Aquatics Strategy 2023-33.
- 3.2 The council-owned swimming pool stock is still extremely popular and well used despite their age and condition (with a number of pools being 30+yrs old).
- 3.3 There were 465,708 swimming visits across the three leisure centre sites with pools in 2022/23. In addition to those participation numbers, there are currently over 2,600 children on Freedom Leisure's Learn to Swim School across the city and a waiting list of over 250 wanting to take part in lessons.

- 3.4 Table 1 below shows the performance of the three council owned public pools in the city over recent years. These participation figures give a good indication of what levels might be anticipated from a new pool.

Table 1: Performance of Council owned Pools in recent years

	King Alfred	Prince Regent	St Lukes
Swimming participation 2018-19	272,743	236,319	58,977
Swimming participation 2022/23	177,501	237,815	50,392
Swimming participation 2023/24 first 8 months (Apr-Nov)	153,979	160,182	33,661

- 3.5 Included in the table are figures from 2018/19 which show the highest levels of participation pre-Covid pandemic. Although usage has increased since the pandemic 2019/20/21, the leisure industry is still recovering. These figures therefore indicate the levels that could be expected in the coming years. Previous analysis undertaken by consultants on the SFIP using these 2018/19 figures also showed that all three of our current pools are operating at income levels above the national benchmarking figures per m2 of water space.
- 3.6 The figures included in the table for the year just gone (2022/23) show slightly lower than expected levels of participation at the King Alfred. This is however due to the pools being closed from January to March 2023.
- 3.7 The most recent figures shown above for the current year's operation so far to date are promising and give an indication that high levels of participation are likely to be achieved (if there are no more closure periods).
- 3.8 Brighton & Hove City Council is also one of the few local authorities to provide free swimming to all children aged 4-18 after school, on the weekends and in school holidays which has enabled swimming participation to grow year on year. This is currently subsidised by Public Health monies and corporate funding and will continue to be reviewed.
- 3.9 As well as public swimming provision, there are also a significant number of swimming clubs and aquatics groups within the city, as well as many other open water/sea swimming groups, private swim schools, sessional classes such as aqua fit and school swimming providers.
- 3.10 Although levels of physical activity in the city are high in adults, there are still concerning challenges with children and young people. According to the Joint Strategic Needs Assessment for the city, less than half of under 16's in the city meet recommended activity guidelines each day, and 1 in 3 children do less than 30 minutes of physical activity each day. The levels of physical

activity are less in older residents, those with disabilities/long-term health conditions, those who are long-term unemployed or those in certain ethnic groups: Black, South Asian or Chinese.

- 3.11 Plans to redevelop the current King Alfred Leisure Centre (identified in the SFIP as the 'West Hub') are progressing, which will see a new modern, energy efficient flagship facility built in the coming years. This new facility will replace the existing pool provision, but also enhance it by increasing the pool from a 6 lane to an 8 lane competition pool, larger separate teaching/learner pool, with additional leisure water (e.g. flumes, splashpad for younger children). Although this will provide a slight increase in pool/water space, it will still not be enough to meet the current and future levels of demand for swimming – hence the need to consider additional facilities. Given the scale and complexity of the new West Hub project, it is not expected that the new facility will be complete until 2028.
- 3.12 In the meantime, the current King Alfred Leisure Centre continues to deteriorate in its condition, which provides ongoing operational challenges and requires significant investment to keep the facility open. As part of the condition survey work to inform the SFIP, it was anticipated that approximately £4m+ would be required to be spent in order to just maintain the current facility for five years.
- 3.13 When considering the condition and age of the building and plant, and lack of available funding of this scale, it is recognised that there is an ongoing risk of significant failure and potential temporary or permanent closure before the new West Hub facility is delivered.

Phase 1 – Proposal to develop a new pool at Withdean Sports Complex

- 3.14 As set out above, there is strategic need for additional pool/water space in the city which is becoming more urgent. Finding a site with available (and suitable) land to develop a new pool is challenging, as is designing a scheme that will be affordable in the current financial climate. Bearing in mind these considerations, officers have been working with external consultants to find a feasible solution that can provide the council a new pool option that is viable and deliverable.
- 3.15 The focus of this report is therefore a proposal for a pool at our 'North Hub', Withdean Sports Complex (WSC).
- 3.16 The facility is located in reach of communities in the North-West and East of the city who may be less physically active or be experiencing poorer health outcomes (see catchment analysis included in Appendix 1). The site is accessible by bus, active travel and has associated parking on-site.
- 3.17 A pool at WSC would also be accessible for many local schools to use. This is of key importance to ensure children in our city continue to learn to swim and are confident in water – particularly as this was impacted so heavily during the Covid-19 pandemic and we are still catching up now. There are a

number of primary and secondary schools within a 2 mile radius of the centre.

- 3.18 The proposed scheme will include a 5-lane 25m community pool with changing rooms, toilets and other ancillary facilities. Indicative designs and visuals are included in Appendix 2. The new pool will be a modular above-ground pool, meaning that build costs are reduced and the construction timeline is less compared to conventional pool builds. This approach would in no way effect the quality of the facility for the end user and would have a lifespan of up to 40 years if maintained effectively.
- 3.19 The facility would aim to use and include modern methods and technologies relating to energy efficiency such as heat pumps, microfiltration, pool covers and solar PV to achieve a sustainable facility with a reduced carbon footprint and associated running costs.
- 3.20 The estimated capital cost of this project would be £5.8m, which is in line with benchmarking for other similar facility developments. These costs have recently been updated (as of November 2023) by construction consultants Walker Sime and reflect inflation and the increased construction costs over the past 12 months due to market pressures, as well as the relevant energy and workforce/labour costs in the industry currently.
- 3.21 Ground investigations would be undertaken as part of the initial professional fees, which will help to mitigate along with the pre-existing knowledge the council has of the site having done lots of recent work. The above-ground modular construction method will also negate the need for extensive groundworks, and associated costs.
- 3.22 As set out in section 11 of this report, it is expected that the council would agree cost certainty at the point of entering into a contract – therefore mitigating the risk of the total cost increasing.
- 3.23 This total capital cost excludes contingency. Given the early stages of the design, and the relatively straight forward nature of the works for this project, the council have been advised that 7.5% contingency should be applied at this stage. As the design proceeds our consultants have suggested that they would expect to reduce this contingency in parallel with design development until reaching a point of between 1.5% and 2.5%.
- 3.24 There are currently no identified funds to support these capital costs as the council has no earmarked reserves for increased swimming capacity and there are no unallocated capital receipts. Other funded items in the capital programme could potentially be reprioritised but this is unlikely to be acceptable. There may be a small amount of section 106 funds or possible CIL monies available but it is currently assumed that this project would need to be financed from corporate borrowing. If the council was to borrow the £5.8m required, at a rate of 4%, this would mean a loan repayment of approx. £296,000 per annum assuming a 40-year lifespan/period.

- 3.25 The new pool, supported by the wider leisure contract, will therefore need to make sufficient income to meet operating costs and service loan repayments. Based on a current financial analysis it is anticipated that the new facility to be able to achieve this. See Table 2 below:

Table 2: Financial Case Summary

Total Income	£567,588
Total Expenditure/Running costs*	(£259,440)
Total Surplus	£308,148
Debt Costs (Capital Loan Repayment – over 40yrs @ 4%)	(£295,868)
TOTAL Surplus/(Deficit)	£12,280

* this includes; direct and indirect staffing costs, repairs and maintenance, utilities, cleaning, administration, equipment, catering, cost of goods sold, and rates.

- 3.26 It is anticipated that income generation would be phased in Years 1 and 2, achieving its full potential in Year 3 and any shortfall would be supported through existing revenue budgets. The financial analysis uses current financial data from the current leisure operator, as well as benchmarking from other similar facilities, and is considered to be realistic and achievable. A more detailed financial analysis of projected income and expenditure/running costs can be provided.
- 3.27 In practicality, the loan repayment will be serviced through an agreed contract variation, and management fee. As set out in the SFIP, the cost of delivery of new facility developments funded by long-term borrowing would be paid back through the improved financial returns from the combined portfolio of sports facilities.
- 3.28 It is also anticipated that the future facility mix on this site specifically will contribute and support the overall financial position given that there are a number of capital investment projects due to be completed in Spring 2024. These include 4 x small sided 3G football pitches, 3 court padel tennis facility and a children’s soft play centre. These additional facilities will generate significant additional footfall to the site and income that will be ringfenced.
- 3.29 As with any new community swimming pool facility, key factors in achieving a break-even or surplus position include; a commercial management approach, a realistic pricing structure, a varied and full pool programme, dynamic marketing and promotion, lean staffing structure and tight controls and management of expenditure.
- 3.30 Although there have been recent challenges relating to increased utility costs for leisure operators, the energy market is starting to stabilise, and due to successfully implementing mitigation measures since November 2022, the overall position is now much improved.

- 3.31 In addition, the council was recently successful in being awarded circa £400,000 from Sport England's Swimming Pool Support Fund, to help secure the ongoing operations of the pools across the city. The introduction of new technologies, energy efficient pool plant and use of solar PV should also assist in keeping utility costs as low as possible.
- 3.32 In terms of next steps, in order to take this project forward a commitment of £451,000 will be required to cover professional fees. These fees capture all of the possible costs associated with producing a full design of the new facility (architectural, structural, mechanical and electrical, including for the pool itself), including Planning and Building Control fees. These costs account for the full RIBA 2 to 3 phases, i.e. detailed designs, additional surveys and compiling procurement/contract documents.
- 3.33 It is important to note that the £451,000 required would need to come from capital borrowing, and we would therefore be doing this 'at risk'. If the project didn't proceed then this amount would be funded directly by the council.
- 3.34 Officers are developing a procurement strategy for this project which would enable best value to be achieved, whilst also recognising the expertise required to deliver a modular (above ground) constructed pool of this kind.

Phase 2 – Feasibility for additional pool/water space in the East of the City

- 3.35 As identified in the SFIP, the council is also considering where to build the new 'East Hub' leisure centre in the coming years. A shortlist of potential sites and options analysis was previously undertaken in 2021, but this now needs to be reviewed.
- 3.36 One of the previous options was the possibility of adding a pool to the existing Moulsecomb Community Leisure Centre. Despite this providing opportunities to address some of the health inequalities and levels of physical inactivity that exist in that area, the council has to consider the overall facility mix and local demographics in order to ensure it would be a viable and sustainable option.
- 3.37 Consideration is given strategically and geographically to other pool provision across the city – such as by Brighton University (who are developing the old Virgin Active site which includes pool provision) and other community and commercial pool provision in the area.
- 3.38 Table 3 below demonstrates a 'like for like' comparison using the current modular pool proposal for Withdean to see the difference in viability at the current leisure centre in Moulsecomb:

Table 3

	Withdean Sports Complex (WSC)	Moulsecoomb Community Leisure Centre
Specification	5-lane 25m pool with ancillary facilities	5-lane 25m pool with ancillary facilities
Capital Build Cost	£5.8m Excluding contingency	£5.8m Excluding contingency
Total Expenditure	(£259,440)	(£285,600)
Total Income	£567,588	£321,948
Capital Loan Repayment	(£295,868)	(£295,868)
Total Surplus/(Deficit)	£12,280	(£259,520)

The slight increase in projected expenditure/running costs for Moulsecoomb is due to a number of factors including: increased staffing costs (due to less support staff at the centre currently) and it being a less energy efficient facility, for example not currently having any solar PV on the roof. The reduced income projected is due to there being lower levels of usage of the pool anticipated (current footfall is far less than WSC), lower fees & charges including subsidised/discounted rates and less opportunity for secondary spend as there is currently no café and less goods for resale.

- 3.39 Officers are currently doing further work with architects and cost consultants to determine if an increased specification (i.e. more pool/water space) would impact positively on the overall viability. For example, a larger pool and a separate teaching pool would increase the capacity and therefore projected income from greater levels of usage (particularly on income from swimming lessons). However, this would also increase the capital build costs.
- 3.40 As identified in the SFIP there are plans to redevelop Moulsecoomb Community Leisure Centre by adding a gymnastics facility for the city, as well as extending the existing fitness gym. Feasibility work for this redevelopment will continue in 2024, and officers will look to capitalise on the available section 106 funds available for this site in the coming years to implement the scheme.
- 3.41 Further feasibility work will also be undertaken to consider whether if by implementing these other facility developments (which would generate additional income to the site), it would then enable and make a pool development more financially viable.
- 3.42 For the reasons set out above, officers will continue with this feasibility work to look at all possible site options in the East of the city (including Moulsecoomb Community Leisure Centre), to ensure there is a robust business case and recommendation for where we can deliver additional pool/water space and deliver the 'East Hub'.
- 3.43 Given there is more work still required to find a solution for the East of the city, but still an urgent need to address the immediate shortfall in pool/water space across the city more widely, the plan is to deliver the new pool at Withdean Sports Complex as Phase 1 and then a pool in the East as Phase 2.

- 3.44 Meanwhile, the project to replace the King Alfred in the West of the city continues, with the next key milestone being a decision on the preferred site option expected in March 2024.

4. Analysis and consideration of alternative options

- 4.1 Following feedback from previous consultations within the city, and the recent reports from key stakeholders such as Sport England and Swim England, adequate pool provision for the city is a priority for resident health and wellbeing. The council must look to address this in order to meet the demand and also mitigate the loss of existing pool/water space given the poor condition and age of existing facilities.
- 4.2 The new King Alfred/'West Hub' won't be complete until 2028 at the earliest, and further feasibility for our future 'East Hub' leisure centre is still required, which means the challenge of keeping the current pools open and operational will remain for a number of years. This is relevant primarily to King Alfred Leisure Centre, but also Prince Regent Swimming Complex and St Lukes Swimming Pool.
- 4.3 In terms of the business case, site management and suitability of the site, a new pool at Withdean Sports Complex can be easily integrated and managed within the current site operation and will be built on land currently unused and available at the site.

5. Community engagement and consultation

- 5.1 In many recent consultations that the council has undertaken, swimming remains to be one the most popular activities for people in the city. In addition, recent engagement with the public on the other capital projects at Withdean (3G football, Padel Tennis and children's soft play) has also led to comments and feedback demonstrating a desire for a pool at this site.
- 5.2 This proposal was first discussed back in 2017, with the 3 main swimming clubs in the city putting forward a suggestion to the council for a modular community pool to meet their need for additional pool space. Given the challenges in finding available land and sites in the city, Withdean Sports Complex was considered one of the best options. It is located on council-owned land, is an existing facility with good access, has an existing customer base to help with the financial sustainability, and has a leisure operator in place to manage any new swimming pool.
- 5.3 Since that initial proposal, the council has taken the lead and has been working with specialist consultants to develop plans. The swimming clubs remain an important stakeholder group.
- 5.4 The 'Your Sport, Your Vision, Your City' consultation undertaken in 2020 to inform the SFIP, included responses from residents, local stakeholders, sports clubs, national governing bodies of sport and community organisations. The key messages, relevant to this project were as follows;

- 85% said that a new main swimming pool should be the top priority for any new facility
- The swimming offer in the city needs to provide a better balance of water provision activities
- 33% want the council to further improve and enhance Withdean Sports Complex as our 'North Hub'
- 65% were happy to travel further for better facilities, but would prefer to travel no more than 20 mins

In addition, more recently, the 'Let's Talk Active For Life' consultation was undertaken by the council's Healthy Lifestyles Team to inform the new Sport & Physical Activity Strategy. The output from this consultation also supported the above findings from 2020, evidencing that resident's feelings about swimming and developing new facilities remain the same.

- 5.5 Swim England are in support of this project as it will help to meet the current and future aquatic needs for the city. This was identified in a recent Aquatic Latent Demand report they produced for the council. This report uses a proven methodology and data to estimate the important latent demand for a Learn to Swim programme at a location, based on population size, likelihood measures and water space/provision across the public and private providers in the city. When looking at this insight, they have suggested that a new pool at Withdean would deliver potential for a healthy swimming programme, and provide significant income, as well as meeting the current unmet demand for children's swimming lessons in the city.
- 5.6 In addition to the report from the national governing body, recent data from Sport England's Facilities Planning Model Assessment of Swimming Pool Provision for Brighton & Hove also supports this project. They confirmed that the demand for swimming pools is greater than the supply. Specifically, in order to meet demand, the city would need 1,224sqm more of water. The current pools cannot meet this demand as they are already nearing capacity within community hours. With the build years of the two main sites (King Alfred and Prince Regent) being in the early 1980s, there is the added ongoing maintenance risk and closure to these, which would further reduce the amount of water space available.
- 5.7 The report also identifies that Brighton & Hove has the lowest provision of water space per 1,000 population (at 8sqm) than the surrounding authority areas and significantly less than the South-East region and England average. For a city that aspires to be an active and healthy city providing opportunities for all residents, this position needs to be addressed.

6. Conclusion

- 6.1 The council has a duty to provide adequate and quality sports facilities that enable residents, and visitors, to be physically active and enjoy swimming as a key leisure activity which contributes directly to health and wellbeing.

- 6.2 Whilst there are longer-term plans for replacing current swimming pools within the city in the West and East, there is an urgent need to provide additional pool/water space to meet demand and also act as a mitigation to loss of provision caused by any planned or unplanned temporary or permanent pool closures.
- 6.3 A new modular pool at Withdean Sports Complex would provide much needed pool/water space that can be delivered in a short timeframe. It will also provide additional income that can help with the overall long-term sustainability and viability of the council's leisure centre portfolio (as identified as a key principle within the SFIP). The financial analysis included in this report evidences how this new facility will be able to service a capital loan repayment and potentially make a small surplus.
- 6.4 If approved officers will be able to progress the designs, planning and delivery in order to be able to build this new facility. Consideration will be given to the most appropriate procurement approach, and engagement with key stakeholders will continue.

7. Financial implications

- 7.1 Financial implications in relation to recommendation 2.3-2.6 are set out within the body of the report. The estimated capital costs of £5.8m inclusive of the £0.451m professional fees but excluding contingency, would be funded from borrowing and requires approval from the Strategy, Finance and City Regeneration Committee. It is anticipated the net income after borrowing costs could generate a small surplus of £0.012m per annum. Risks around this project include increased capital costs, further increases to borrowing rates, higher annual expenditure and lower income achieved than anticipated that could all result in a reduction of net income or possibly result in net expenditure. These risks are mitigated to some extent by the cost estimates being updated very recently and the income projections being based on prudent assumptions of the marginal increase in income from the overall offer at Withdean. In addition, the development of this pool would increase resilience of the pool water availability within the city.
- 7.2 There are also no direct financial implications arising from recommendation 2.2. Any potential future options in pool water space within the east of the city will be brought back to this committee for decision.

Name of finance officer consulted: John Lack Date consulted: 19/12/2023

8. Legal implications

- 8.1 On-going legal support and advice will be required to mitigate any risks that might arise throughout the duration of this project, for example in relation to procurement, planning or property matters.

Name of lawyer consulted: Elizabeth Culbert Date consulted: 18/12/2023

9. Equalities implications

- 9.1 This new facility at Withdean will have a diverse and varied pool programme that offers opportunities for all, including those with disabilities, health conditions or mobility issues, older people, or those from BAME backgrounds, to improve or maintain their physical and mental health. An EIA is underway and will address the anticipated positive impact of this new facility on those with protected characteristics.
- 9.2 It is anticipated, as with other pools, to deliver some targeted sessions to increase accessibility and encourage participation in these groups for example women-only sessions.
- 9.3 The location and accessibility of the facility at Withdean will be able to help serve communities in the North-West and East of the City who are less physically active, and where there are significant health inequalities (as shown in Appendix 1).
- 9.4 As with any new facility, the design will be compliant with relevant legislation, and will focus on ensuring it is fully accessible.
- 9.5 Further engagement will be undertaken with the community and targeted groups to ensure that the pool and ancillary areas such as toilets, showers and changing rooms meet the necessary requirements such as having appropriate hoists, specialist provision or other aids.

10. Sustainability implications

- 10.1 By using a modular construction, the facility will have a reduced environmental impact and lower carbon footprint compared to an in-ground equivalent. Building above-ground can see a 50% reduction in CO2 emissions compared to an in-ground equivalent and could save at least 285 tonnes of material. This will help to contribute towards the council's Carbon Neutral 2030 target and ambitions.
- 10.2 Modern and energy efficient design (pool and associated plant) will lower the annual maintenance costs and enable repairs to be made without large-scale structural change and at a reduced cost.
- 10.3 It is anticipated that altering the indicative/original designs for the roof orientation to enable additional solar PV to be added to the site would contribute to the overall sustainability of the facility.
- 10.4 Given that this new facility would be classed as a minor development in planning terms, it would be required to ensure that BREEAM 'Very Good' is achieved. This not only supports one of the key investment principles within the SFIP but would also align with the council's 2030 carbon neutral target.

11. Other Implications

Social Value and procurement implications

- 11.1 As referenced in 3.22 and 3.34, the planned procurement approach for this project will ensure that the council gets best value and the appropriate expertise from contractors. This will be done via two phases of procurement; the first to take the project forward to the next design stage with a planning application, and the second to appoint a build contractor with cost certainty of the total project cost. A range of approved frameworks are being explored.
- 11.2 Any procurement will consider social value to ensure there are commitments and KPIs included in any tender and contract.
- 11.3 In terms of the delivery of the new facility itself, there will be significant social value created. According to Sport England, every £1 spent on community sport and physical activity provides a return on investment of £4 for individuals and society. These impacts will include positive contribution to the local economy through construction and the creation of new operational jobs, a positive impact on the health and wellbeing of our residents (therefore creating future savings within the NHS and other council services) as well as strengthening local communities through community engagement, belonging and volunteering through local sports clubs and groups.

Crime & disorder implications:

- 11.4 N/A

Public health implications:

- 11.5 Sport and leisure facilities, and in this case swimming pools, are important in achieving and supporting the Brighton & Hove Health & Wellbeing Strategy that focuses on prevention, reducing health inequalities and increasing healthy life expectancy.
- 11.6 The health benefits of swimming as an activity are significant, particularly as it is a life-long activity that residents can participate in at any stage in their lives, irrelevant of age and ability. Swimming is also well known to have a positive impact on mental health as well as physical health.
- 11.7 This introduction of this new facility will provide long-term savings to the NHS and other public services, by increasing levels of physical activity in residents, and therefore preventing and reducing the need for expensive health and support services in future.
- 11.8 This new facility will also help to serve some of the communities in the North-West and East of the city that are less physically active and where health inequalities are more prevalent. It will also help to meet demand for children and young people learning to swim – an important life-skill for those living in a coastal city.

- 11.9 As with our other existing facilities, we will be considering ‘pay and play’ options, the Leisure Card scheme, and other targeted programmes that provide access to free and low-cost opportunities to make our facilities as accessible and affordable as possible.

Supporting Documentation

1. Appendices

1. Catchment Analysis
2. Site plan and indicative designs

2. Background documents

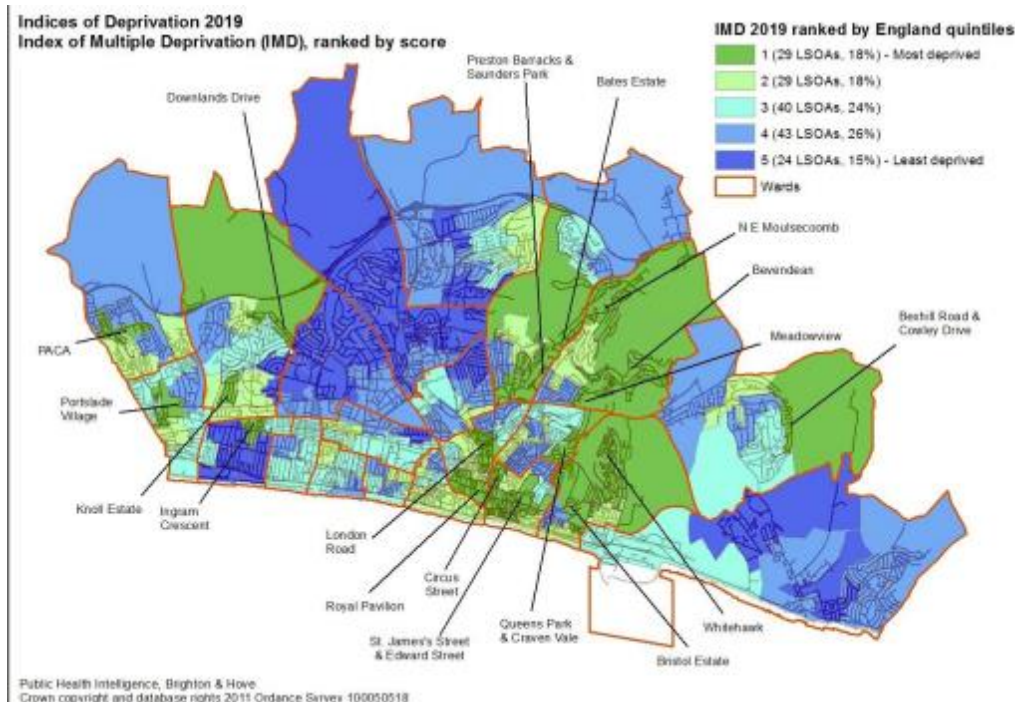
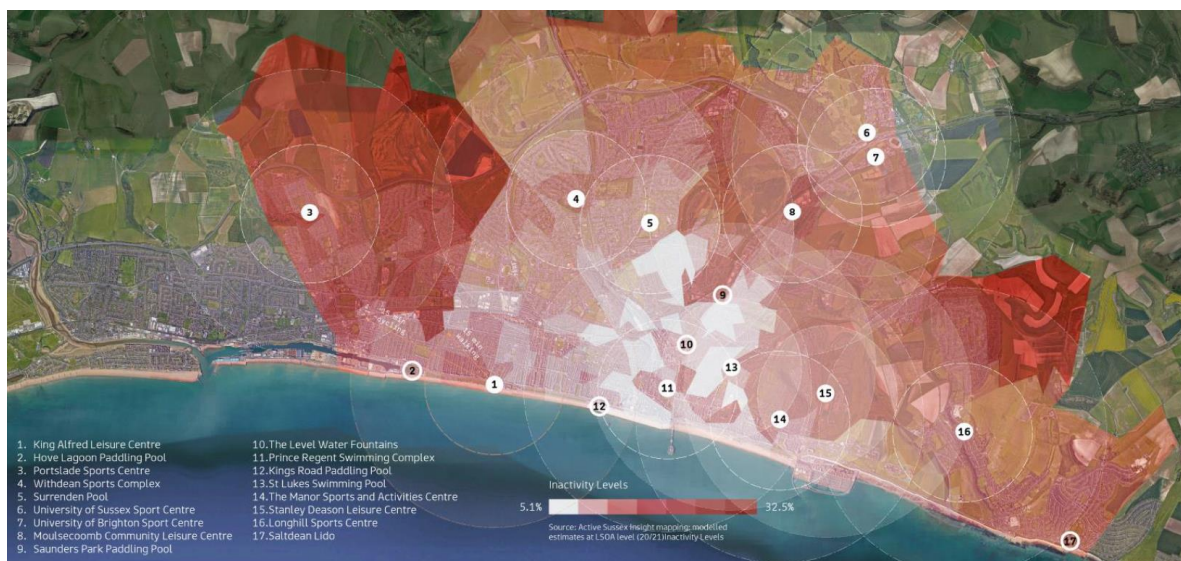
[Sports Facilities Investment Plan 2021 to 2031 \(brighton-hove.gov.uk\)](https://www.brighton-hove.gov.uk/sports-facilities-investment-plan-2021-to-2031)

[bandh-jsna-exec-summary-june-2022 - 07 07 2022.pdf \(brighton-hove.gov.uk\)](https://www.brighton-hove.gov.uk/bandh-jsna-exec-summary-june-2022-07-07-2022.pdf)

CHSTE 18th January – New Swimming Pool at Withdean Sports Complex and pool provision in East of the City

Appendix 1 – Catchment Analysis

The map below shows the levels of physical inactivity of residents within the city. The scale shows that the darker red the areas are shaded, the higher levels of physical inactivity there are. Plotted on the map are a range of sports and leisure facilities, with the relevant ones to this report being number 4 Withdean Sports Complex, and number 8 Moulsecoomb Community Leisure Centre.



Levels of physical inactivity, as well as associated health inequalities, are broadly more prominent within areas of deprivation in the city. The highest concentration of

deprivation is in the Whitehawk, Moulsecoomb, Hollingbury, Hangleton & Knoll, and Portslade areas.

An additional pool at Withdean and Moulsecoomb (or other site identified in East Brighton) would provide opportunities for these communities to access important leisure provision to improve health outcomes for local people. In particular: women, those from BAME backgrounds, those with a disability or long-term health condition, as well as the children (1 in 3) who are doing less than 30mins physical activity a day.

As part of the wider plans within our Sports Facilities Investment Plan, the council is also currently considering site options for redeveloping the King Alfred Leisure Centre. One of those site options is to build the new facility further inland, and closer to these specific communities in Hangleton & Knoll and Portslade. If this site is chosen it has the potential to deliver significant health impact and improvement for the communities mentioned above.

CHSTE 18th January – New Swimming Pool at Withdean Sports Complex and pool provision in East of the City

Appendix 2 – Site Plan and Indicative Designs/Visuals

The red line indicates the outline of the entire site, and the yellow box indicates where the swimming pool would be located within the site – which is to the North and is parallel to the main entrance. The current footprint of the new pool proposed is 997m².



Visuals – Exterior

See below for designs and visuals drawn up by ReCreation and Box Architects.

Current Facility – proposed location:



Indicative New Facility:



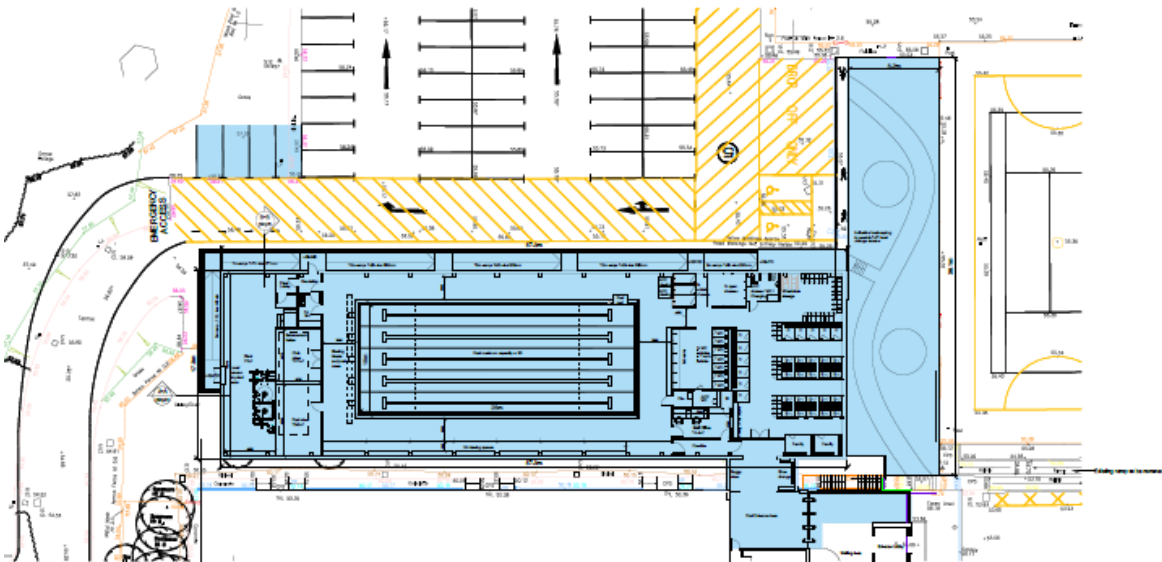
The design aims to complement the design of the existing centre roof, keeping the roof height below the existing eaves. However, the orientation of the roof may change, or it may be flat, in order to accommodate solar PV panels. Several material options for the structural frame have been considered, with a braced steel frame being the most suitable choice because it will simplify the link to the existing reception as it is also a steel framed building. The use of steel also simplifies the foundation arrangement, it is a cost-effective solution, and common/simple technique that could give more choice in relation to contractors.

Visuals – Interior



Expansion of the existing reception area would create a barriered entrance/exit and will provide the ability for the swimming pool to be integrated and managed as part of the current facility via the existing reception. The pool will be located to the right-hand side as you enter the existing front door. There will be a buggy park and shoe change area in the entrance/foyer area.

RIBA 1 Plan



By incorporating a 5-lane pool, it will give the maximum possible pool space (capacity of 83) and the potential for increased financial sustainability.

Other features to highlight are:

- Proposed pool depth is 1.35m to comply with FINA and Swim England competition standards for diving – platforms can be used for learn to swim/community swimming if needed
- Accessible hoist/platform

- Gender neutral changing village including group rooms
- Spectator seating for approximately 100
- Pool-side storage – one for swimming clubs to use
- Office with direct access to pool hall – to replace the two offices lost in reconfiguring the main reception area
- Buggy Park/Shoe Change Area – located at the main entrance to prevent congestion in changing areas and to help maintain a clean, safe poolside

Brighton & Hove City Council

Strategy, Finance and City Regeneration Committee

Agenda Item 90

Subject: City Clean Independent Inquiry

Date of meeting: 25th January 2024

Report of: Chief Executive Officer

Contact Officers: Alison McManamon
Director of Human Resources & Organisational
Development
Email: alison.mcmanamon@brighton-hove.gov.uk

Donna Chisholm
Executive Director, Environment, Economy & Culture
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Ward(s) affected: All

For general release

1. Purpose of the report and policy context

- 1.1 In July 2023 the Council launched an independent inquiry into serious whistleblowing complaints about behaviours and activity within the Council's waste service (City Clean). The complaints contained multiple allegations of sexual harassment, discrimination based on disability, bullying and intimidation.
- 1.2 The outcome report was received on 13th November 2023 and describes numerous accounts of appalling behaviour faced by staff and managers at City Clean. This report presents the findings of the inquiry and seeks formal approval for the recommendations of the report and the subsequent action plan that has been developed to ensure the serious and devastating findings of the report are addressed.

2. Recommendations

That the Strategy, Finance & City Regeneration Committee:

- 2.1 Notes the findings of the independent inquiry report, as detailed in Appendix 1.
- 2.2 Notes and reinforces the apology issued by the Council's leadership to every staff member who has been affected by these behaviours, past and present, and to residents whose service has been affected by the dysfunction that has resulted.

- 2.3 Approves all recommendations of the independent inquiry report, as detailed on pages 18-19 of Appendix 1, and the action plan in Appendix 2.
- 2.4 Gives delegated authority to the Director of HR&OD to issue and serve the necessary notice on or after 26th January 2024 to terminate the council's existing disciplinary and disputes procedures.
- 2.5 Authorises the Director of HR&OD to take all steps necessary or incidental to preparations for the implementation of arrangements that will replace the role of Personnel Appeal Panels in those procedures, and therefore cease any involvement of members in employment procedures from 26th July 2024 (aside from statutory responsibilities associated with disciplinary action against Statutory Chief Officers under the law or against other Chief Officers under the JNC terms and conditions).
- 2.6 Notes that a further report with the proposed new disciplinary and disputes procedure and necessary amendments to the Council's Constitution to remove reference to the Personnel Appeals Panel will be brought to Council or the Strategy, Finance & City Regeneration Committee for approval.

3. Context and background information

- 3.1 On 4th July 2023 the Council announced the start of an independent inquiry into whistleblowing complaints about behaviour and working culture at City clean, following receipt of 19 statements disclosing harrowing accounts of sexual harassment, racism, disability discrimination, bullying and intimidation taking place at Hollingdean Depot.
- 3.2 The council is committed to providing a safe, fair, and inclusive working environment for all its staff, and the statements received outlined horrendous details of an allegedly toxic culture. The situation outlined in the complaints contravened all expectations of the council's stated aim to be an exemplar employer where all staff feel a sense of belonging in a safe workplace that enables them to best serve the city.
- 3.3 Given the scale of the complaints received, and the potentially devastating impact on so many council staff and the quality of service received by residents, it was decided that an entirely independent inquiry was needed. This inquiry would require complete transparency and permission to publish the outcome in the public interest. It was for this reason that Aileen McColgan, Kings Counsel (KC) was appointed.
- 3.4 The launch of the inquiry was publicly announced, and anyone who worked at City Clean or was in a role that had significant involvement with the service, was able to meet with the KC, including ex-employees.
- 3.5 During the inquiry, which took place over eight weeks, over 70 witnesses provided evidence with complete anonymity and under conditions of secrecy due to the fear of retaliation as expressed by witnesses; a fear that the KC deemed to be well-founded. In addition, the KC was provided with extensive documentary evidence from several sources, both unsolicited and at her

request.

- 3.6 The findings of the report are harrowing to read and describe a working environment at City Clean that can only be described as toxic. Given the nature of the allegations, much of the report relates to the behaviour of individuals, many of whom are either GMB representatives or a group of people who were described to the KC as being 'protected' by the GMB. It is important to note that the KC inquiry did not involve an investigation of specific allegations made, and individuals accused, most of whom did not come forward to speak to the KC, had not at the time of publication been given the opportunity to answer the allegations.
- 3.7 There were a number of recommendations of formal disciplinary action, and this is the process through which individuals identified in the report are being given the opportunity to answer the allegations against them.
- 3.8 With regard to the local management team, the report identifies that managers have been significantly impacted by the bullying behaviours, and that where they have made efforts to manage the behaviours, they have been unable to appropriately respond by reason of the threat of industrial action and a (reasonably) anticipated absence of political support.
- 3.9 The findings of the report were discussed at the last meeting of full Council and received broad support from all groups and members.
- 3.10 The report's recommendations, outlined in full on pages 18-19 of Appendix 1, provide the basis for an action plan to address the extremely serious issues identified. The recommendations focus on:
- Removing member appeal panels (see para 3.11 to 3.14 below);
 - A review of alleged agreements that are said to apply in the City Clean service, but which are not written or agreed;
 - A review of all consultation arrangements, and the conduct of industrial relations, including a review of previous agreements which are deemed to be unworkable;
 - A review of the disciplinary and grievance procedures to ensure that timescales are adhered to;
 - A review of recruitment practices at City Clean;
 - A requirement that all staff, including trade union representatives, comply with the Council's behaviour framework;
 - Ensuring equal treatment of both the council's recognised trade unions (GMB and UNISON) at City Clean, and that the workers forums are supported in their role at City Clean;
 - The removal of the GMB union office and parking space at City Clean.
- 3.11 Significant action has been taken already in response to report recommendations. This includes a refresh of behavioural standards across all City Clean services and the implementation of a zero tolerance approach to poor behaviour with disciplinary processes to address the issues

identified.

- 3.12 Following the publication of the independent KC report in November, the City Clean refuse and recycling service improved. Missed kerbside refuse collections reported via the council's website went from 2552 instances in the first two weeks of August, to 205 in the first two weeks of December. A reduction of over 90% in four months. Missed kerbside recycling collections dropped by 68%.
- 3.13 To ensure the changes already implemented are maintained, an action plan has been written which provides for a transformative programme of work over the next 12-18 months. The action plan includes a full culture change programme, as well as many initiatives that will create a healthy workplace and improvements in the service provided by City Clean. The culture change programme embeds the immediate actions taken and will be co-created with staff, Trade Unions and workers forums.
- 3.14 The first recommendation of the report is to remove Member Personnel Appeal Panels. The report notes that witnesses described 'a high degree of interference from politicians in disciplinary processes at City Clean' and concerns about 'individuals dismissed for gross misconduct having been reinstated by Member Appeal Panels'. The evidence considered by the independent KC led her to conclude that the Council should cease to operate Member Appeal Panels.
- 3.15 Personnel Appeal Panels have been in place since the formation of Brighton & Hove City council in 1998 and hear all appeals against dismissal, or the second stage of a collective dispute registered by any recognised Trade Union. Most local authorities have removed member panels from all employment processes.
- 3.16 The removal of elected members from decision making in the disciplinary and dispute procedure provides for greater clarity of roles between members and officers of the council. It is the role of members to set the strategic direction and policy framework for the council, and this will include ensuring the right policy framework is in place to manage employment issues. Any changes to the main employment procedures are approved by the Strategy, Finance & City Regeneration Committee.
- 3.17 The Head of Paid service is a statutory role and is responsible for ensuring the council's functions are properly coordinated. This includes ensuring the right staff are in place, how staff are organised, led, managed and developed. The involvement of members in disciplinary and dispute processes (aside from specific statutory responsibilities related to some chief officers) blurs the clarity of responsibilities derived from respective roles.
- 3.18 The removal of Personnel Appeal Panels will require changes to the disciplinary and dispute procedures, and consultation with GMB and UNISON. A revised arrangement will replace the panels and ensure a robust arrangement for appeals, without the involvement of elected

members. It is therefore recommended that the required 6 months' notice is given on the disciplinary and dispute procedure, and the necessary consultation with trade unions takes place to implement new procedures by 26th July 2024.

4. Analysis and consideration of alternative options

- 4.1 The KC report outlines serious and harrowing issues experienced by staff and managers within City Clean and full acceptance of the recommendations is required to ensure issues are addressed effectively and the necessary changes are made to provide assurance to staff and managers that they will be supported in a fair and inclusive workplace.

5. Community engagement and consultation

- 5.1 Immediate actions have been discussed with trade unions, in particular the removal of Personnel Appeal Panels was discussed at a meeting with trade unions on 22nd November 2023, and at Joint Staff Consultation Forum on 5th December 2023. Further consultation will take place over the next 6 months to make the necessary changes to the Disciplinary and Dispute procedures.
- 5.2 The culture change programme has been discussed with small groups of staff and will be subject to discussion with the workers forums and the trade unions.
- 5.3 The workers forums have run surgeries at the depot and will continue with these into the future.
- 5.4 The action plan will be published, and updates will be provided on a regular basis, ensuring transparency and accountability for implementation.

6. Conclusion

- 6.1 Given the harrowing nature of the situation described in the report, and the evidence of a toxic culture at City Clean, it is recommended that the full report is endorsed and the recommendations are implemented at pace.

7. Financial implications

- 7.1 The cost of the King's Counsel's very extensive investigation and report is £226,253.90. Exceptional legal or investigatory costs can arise from year to year for many reasons including responding to Judicial Reviews, Planning Appeals, group pay claims, health & safety (HSE) investigations, or other non-standard legal matters or investigations. These are normally dealt with using either the Corporate Contingency budget, available risk reserves, or the Working Balance depending on the availability of resources or provisions. Where these are insufficient or unavailable, costs are managed as part of the overall General Fund Targeted Budget Management process whereby financial recovery measures are applied in order to mitigate the impact of exceptional costs.

- 7.2 Beyond the independent investigation costs, there are no other direct financial implications arising from the report apart from a minor saving of member expenses related to attending Personnel Appeal Panels. However, a robust and effective disciplinary and disputes procedure that is not undermined by a toxic culture, is free from any opportunity to lever political bias, and enables effective management of organisational performance has potentially significant beneficial financial implications for the Council through enabling more efficient and better value for money services.

Finance officer consulted: Nigel Manvell Date consulted: 9/1/24

8. Legal implications

- 8.1 As set out in the body of the report, the Council must follow its agreed policies in relation to all staffing matters. The changes proposed to the disciplinary and disputes procedures require a 6 month notice of termination to be issued. The proposed new procedure will need to comply with the ACAS statutory Code of Practice on disciplinary and grievance procedures which includes principles for handling disciplinary and grievance situations in the workplace. The abolition of a Sub-Committee such as the Personnel Appeals Panel can be approved by the Strategy, Finance & City Regeneration Committee, as set out at Article 13.03 of the Council's Constitution.

Name of lawyer consulted: Elizabeth Culbert Date consulted 04.01.24

9. Equalities implications

- 9.1 The Independent Inquiry was commissioned following whistleblowing allegations that contained multiple allegations of sexual harassment, discrimination based on disability, bullying and intimidation. The council has a Fair & Inclusive Action plan which outlines the actions being taken to ensure the organisation is a place where all employees feel a sense of belonging and are able to work in an environment that is free from discrimination, harassment and intimidation. The actions outlined in this report seek to address the inequality that has existed at City clean, and will involve close collaboration with our workers forums to ensure the culture and environment at City clean is as fair and inclusive as other parts of the council.

Supporting Documentation

Appendices

1. Report by Aileen McColgan KC for Brighton & Hove Council, 13th November 2023
2. Action plan

REPORT BY AILEEN MCCOLGAN KC FOR BRIGHTON & HOVE COUNCIL, 13 NOVEMBER 2023

Executive Summary

1. I have been instructed by Brighton & Hove City Council (“the Council”) to conduct an independent investigation into complaints about behaviours and activity within the Council’s waste service (“City Clean”). The complaints, which I have concluded raised cases to answer under the Council’s disciplinary processes, contained multiple allegations of sexual harassment, race discrimination, discrimination based on disability, bullying and intimidation.
2. During the course of my investigations I spoke to over 70 witnesses who came forward in response to the Council’s invitation to approach me directly. Face-to-face interviews were conducted under conditions of secrecy because of the level of fear expressed by some potential witnesses about potential retaliation. In view of the matters discussed in this report I regarded that fear as well founded. I was provided with extensive documentary evidence from a number of sources, both unsolicited and at my request. I heard numerous accounts of appalling behaviour faced by staff and managers at City Clean including accounts of individuals:
 - 2.1. shouting and/or swearing at and/or threatening staff;
 - 2.2. acting in a physically aggressive way, making implicit and explicit threats to use physical violence and in fact using such violence;
 - 2.3. referring to managers as ‘cunts’, ‘wankers’, ‘a fucking bitch pulling the strings’;
 - 2.4. racially harassing members of staff including by racist name calling and graffiti;
 - 2.5. sexually harassing women staff and managers;
 - 2.6. harassing gay staff including by ‘catfishing’ them.
3. Many of the individuals accused of these and other inappropriate behaviours are either GMB reps within the Council, or are among a group of around 10 white men who were described to me by witnesses as having been particularly protected by the GMB reps within the Council. It is important to stress that those individuals, most of whom did not come forward to speak to me, have not yet been given the opportunity to answer any of these allegations. This being the case, I have made every effort to avoid the identification in this report of individuals accused of wrongdoing.
4. I am satisfied that managers at City Clean and elsewhere in the Council have, until recently, been unable to respond appropriately to the behaviour discussed in my report by reason of the threat of industrial action and a (reasonably) anticipated absence of political support.
5. I found no evidence that any of the managers I spoke to were hostile to trade unions. Many, perhaps a majority, identified themselves to me as trade union members.

1. Introduction

6. I have been instructed by Brighton & Hove City Council ('the Council') to conduct an independent investigation into allegations concerning behaviours and activity within the waste service. The Council issued a call for witnesses which extended to 'any member of staff at City Clean or ... employed by the council who have been in roles significantly associated with City Clean, or ex-employees in these categories'. I have been provided with statements from a number of individuals and was contacted by numerous others as a result of the Council's call for witnesses. Many worked at City Clean. Others had done so in the past or were or had been significantly involved with City Clean as a result of their work for the Council.
7. During the course of my investigations, which took place over 8 weeks, I spoke to over 70 witnesses who provided their evidence to me on the basis that it would not be attributed to them in any report and that it would not be passed on to the Council without express written permission. I spoke to the vast majority of these people face-to-face or on Teams. Face-to-face interviews were conducted under conditions of secrecy because of the level of fear expressed by some potential witnesses about potential retaliation. In view of the matters discussed in this report I regarded that fear as well founded. I was provided with extensive documentary evidence from a number of sources, both unsolicited and at my request.
8. I have provided the Council with a report containing my full findings in which I made a number of recommendations, including recommendations that disciplinary action be considered against persons named in the report. Those recommendations are included below to the extent that they are appropriate for broader publication. The full findings and recommendations contain confidential information unsuitable for such publication.
9. The Council regards publication of a report into my findings as necessary in the interests of transparency because the issues I have investigated concern a publicly funded major Council service which is universally used by residents and are, accordingly, of significant public interest. The Council is committed to transparency and the need to ensure that residents are aware of any major developments that may affect the service they receive.
10. Given the nature of my investigation it is inevitable that much of the discussion in this report is of the alleged behaviour of individuals. Many of these individuals are either GMB reps within the Council, or are among a group of around 10 white men who were described to me by witnesses as having been particularly protected by GMB reps within the Council. It is important to stress that those individuals, most of whom I have not spoken to, have not yet been given the opportunity to answer any of these allegations. This being the case, I have made every effort to avoid the identification in this report of individuals accused of wrongdoing.¹
11. During the Maxwellisation process the Southern Region of the GMB, which was sent extracts of a draft version of this report, made a number of comments. Among these was that no complaints had been received by the Region about the type of conduct described in this report and that it had not been provided with information which would permit the Region to carry

¹ This includes referring on occasion to 'GMB reps' below to include the singular. I should stress that references to 'GMB reps' do not include all GMB reps at the Council.

out any investigations into alleged wrongdoing. The Region also stressed in its response that the GMB ‘condemns bullying, harassment, racism and homophobia, and does not condone such behaviour’, further that ‘If - after a full and fair investigation - GMB members, officials or employees are found to have acted in such ways, they will be dealt with under the GMB Rule Book and disciplinary procedure’.

12. I make no findings in my report of any failure on the part of the GMB regionally or nationally to investigate alleged wrongdoing, and references to GMB reps and/or to individuals described to me as being particularly protected by the GMB reps within the Council should not be taken to imply that national or regional GMB condoned the actions of such individuals. I am satisfied, however, that GMB Southern Region was aware of allegations of misconduct by the GMB rep discussed at paragraph 17 below. It was also aware of the allegations of misconduct discussed in the Doherty report referred to below.

2. Background

13. City Clean is a department of the Council with responsibility for waste and recycling collection, street and beach cleaning. It incorporates Customer Services and Projects and contracts teams as well as Operations and is based at Hollingdean Depot (hereafter ‘the Depot’), which also accommodates environmental enforcement services.
14. Brighton & Hove City presents particular challenges as regards waste collection. It has narrow streets which pose difficulties of access for refuse and recycling trucks. Many properties lack space to store bins etc, which are therefore on the street. These difficulties have also resulted in an unusually high level of dependence on communal waste disposal in large street-based bins. The city has high numbers of multiple occupancy premises with shared bins in basements and similar, which can quickly become fire hazards. It is also highly dependent on visitors who create additional waste and impose additional expectations. The result is that interruptions in waste collection can very quickly create very significant difficulties for residents, visitors and the Council. This means that the threat of industrial action by waste/ recycling staff carries enormous weight within the City.
15. Also important by way of background is the political context; Brighton & Hove City Council was created in 1997. After a period of 6 years in which the Labour Party was in control of the Council there was a 20 year period of no overall political control, the Council moving between Labour, Conservative and Green minority leaderships between 2003 and 2023 (when a majority Labour administration was elected).² Further, the Council operated a committee system from 2012 to 2023, which meant that Council leaders of minority administration had limited powers. Many of those I spoke to told me that this factor made administrations particularly vulnerable to the threat of industrial action, particularly when the threat occurred just prior to elections.
16. Many staff at City Clean are unionised, with the vast majority being members of the GMB. The Council recognises the GMB and UNISON for the purpose of collective bargaining. The

² This administration is responsible for the decision to commission my investigation.

GMB has a Branch Secretary at the Council who is employed for that purpose, having TUPE transferred into the council following the 2001 transfer in-house of waste services (previously run by a private contractor). The UNISON Branch Secretary role is shared by two individuals who have full time release for that purpose. The GMB has an office and a full-time release union rep at City Clean (not, I understand, anywhere else in the Council) and a significant number of additional union reps all of whom have some release time for union duties. UNISON has for a short time had a union rep at City Clean but this person is at present absent from the Depot for reasons discussed below. GMB reps participate in CCG (City Clean Consultative Group meetings) meetings every six weeks with management at City Clean. I have been told that UNISON has been excluded from those meetings at the insistence of GMB reps within the Council.

17. I have been provided with evidence which suggests that, by 2017, bullying behaviours had become normalised at City Clean. This included bullying by GMB reps within the Council. There was a change of management at City Clean in 2017 and a transformation programme was initiated to address performance, regulatory compliance and cultural issues at the Depot. Concerns about criminality, intimidation, bullying and harassment were raised with senior management. Many of the concerns related to the alleged behaviour of a GMB rep. The investigations which were initiated in response resulted in escalating tensions between the GMB and the Council and to allegations by the GMB that management at City Clean were anti-union. This resulted in threats of industrial action in 2019. ACAS became involved and an external investigation was commissioned from Gerry Doherty, a former TSSA General Secretary. Mr Doherty's death was reported at the time of drafting. According to his report, Mr Doherty was a long-standing and currently retired member of the GMB union'.
18. Mr Doherty reported in August 2019 that he had not been provided with 'definitive evidence' of 'anti-trade union behaviour from management', though he could 'fully understand how the GMB union came to the conclusion that management actions in [dealing with allegations that the GMB rep referred to above had physically assaulted a staff member] lead [sic] them to conclude that that there was inherent anti-trade union bias in the paid services hierarchy of the Council'. I am satisfied on the evidence which I have seen that the matters investigated by Mr Doherty did not involve anti-trade union behaviour from management, further that allegations he investigated of witness intimidation by a City Clean manager were without foundation.
19. Meanwhile, in May 2019 a minority Labour administration was returned to power. ACAS negotiations failed to avert notice of industrial action by the GMB in relation to alleged anti-trade union activities within City Clean. A number of witnesses indicated that there were close links between the Labour administration and GMB reps within the Council and concerns were expressed to me that highly confidential information passed between the administration and GMB reps within the Council.³ Witnesses also described a high degree of interference from politicians in disciplinary processes at City Clean.

³ I am happy to confirm, in response to a request by the GMB Southern Region, that I have made no findings that any Labour councillor in the Council failed to comply with the obligation to disclose their membership of the GMB.

20. I was told that the Council failed to respond publicly to a GMB press campaign alleging anti-union management at City Clean. The Council and Policy & Resources Committee prevented the suspension of the GMB rep referred to in paragraph 17 above, and permitted his return to the Depot in the face of threatened industrial action over the Pride weekend. By contrast, a manager who had been involved in disciplinary investigations into the GMB rep left the Council with a settlement agreement because, I was told, GMB reps within the Council had made it clear that industrial action would ensue if he was returned to City Clean. The message this sent out was that managers at City Clean were powerless to impose disciplinary sanctions on GMB reps within the Council or individuals perceived to be particularly protected by them.
21. Mr Doherty's report, *Independent Review re: Anti-TU Activities*, suggested minor amendments to the language of Council policies and the range of disciplinary sanctions and made various, fairly minor, criticisms of the Council's approach to disciplinaries. It remarked that there appeared to be no basis for the existence of a full-time union release GMB position at City Clean. Mr Doherty was critical of the fact, further discussed below, that GMB reps frequently made reference to agreements which were alleged to exist between the union and the Council but which were not made available to him despite his request. He further remarked on the irony that 'the location where the most generous facility arrangements are dedicated [City Clean] is the location where there are the most problems with regard to industrial relations.' Mr Doherty recommended an urgent review of the Facilities Agreement. I saw no evidence that any such review took place.
22. Mr Doherty provided an Addendum to his report in which he referred to the fact that, following a Local Government Association ('LGA') report into the Council in April 2017 which concluded that a reset of 'dysfunctional' trade union relations was required, the Council's CEO had met with UNISON's and GMB's Branch Secretaries and that, while the former had been positive about moving forward, the latter said he was not interested:

'I find that disappointing... the whole issue of trust and mutual respect ... has completely broken down and has led to the current threat of industrial action on the part of GMB'.
23. Mr Doherty referred to a recommendation made by the LGA Report that 'Elected member involvement in HR operational matters should cease', the 'role of elected members [being] to set policy [and] to provide a climate that allows managers to manage ... Blurring of respective roles and accountabilities is unhelpful'. He remarked in 2019 that 'This recommendation, dating back to April 2017 does not appear to have been acted upon' and suggested that 'all parties might wish to reflect on this'. I heard concerns about individuals dismissed for gross misconduct having been reinstated by Member Appeal Panels. Such panels are provided for by Council procedures and are available to employees irrespective of union membership but concerns were raised with me about the propriety of allowing panels whose members may have received (and declared) GMB funding, to 'completely, unashamedly just reverse officer decisions' relating to GMB reps and/or individuals described to me as being particularly protected by the GMB reps within the Council. Another witness told me that having politicians sitting on the panels for collective disputes and dismissal cases 'further enhances the GMB

power to subvert normal council processes'. I have made recommendations in relation to this matter.

24. The Doherty report went to the Council's Policy & Resources Committee in December 2019. The Committee noted that agreement had been reached during the ACAS negotiations that the Council and the GMB would 'work ... to identify all known local agreements and create a definitive log' thereof. I saw no evidence that this has happened.
25. Many witnesses told me that the result of the 2019 dispute was that GMB reps within the Council and/or individuals described to me as being particularly protected by them were regarded as untouchable and that management with responsibility for City Clean felt powerless to manage. I was told that the message which had been conveyed to managers at City Clean by these events was that attempts to subject any such individual to disciplinary action in connection with bullying, harassment, and/or threatening behaviour would result in the departure of the relevant manager rather than the individual. This message has continued to be felt at City Clean and it is only recently that that position has begun to shift. I am satisfied that the outcome of the 2019 dispute, rather than any general lack of competence on the part of City Clean managers, has been responsible for subsequent shortcomings in the disciplinary and performance management of staff at the Depot.
26. UNISON filed a collective dispute in 2019 about alleged bullying and harassment of UNISON members at City Clean by GMB members. Allegations included long term agency staff being told that 'they would never get a permanent job at the depot unless they supported all GMB actions, including unofficial strikes', threats of violence by one GMB rep and statements by another that 'If you fuck with me, I will make sure you never fucking work again'. Individuals impacted by the behaviour reported panic attacks, depression and suicidal thoughts.⁴ The Council's Personnel Appeals Panel accepted in October 2019 that impacted individuals had been 'feeling under threat or unsafe, suffering from stress, anxiety and upset because of action that had been taken by GMB representatives or because of action that it was feared would be taken' and that this was ongoing. I was told that no meaningful action was taken on the Panel's decision.
27. In 2020 Labour lost control to the Greens who formed a minority administration. The GMB took industrial action in 2021. A number of witnesses told me that this was triggered by attempts by City Clean management to performance manage a driver who was perceived as being strongly protected by GMB reps within the Council. Witnesses also told me that false claims were made that the driver involved had had a heart attack. The GMB Southern Region has advised that the formal notification relating to the dispute 'did not relate to the (attempted or actual) performance management of one driver'. The ballot paper summarised the issues in dispute as relating to the Council's alleged failure to follow policies and procedures 'regarding HGV holding drivers, and resulting decision making around variations of duties, crew changes,

⁴ The GMB Southern Region has advised that 'It does not appear that complaints of the nature identified herein were raised with the GMB regional or national offices'.

planning for collecting of dropped work...’, a summary which is in my view consistent with the accounts of the witnesses referred to above.

28. One of the outcomes of the industrial action was an agreement between the Council and the GMB which further reduced management’s ability to manage City Clean staff. That agreement is discussed below.

3. The environment at City Clean

I. General

29. One witness described City Clean as being like *Animal Farm*. Others described the environment as ‘toxic’.
30. I was told, and I accept, that there are many issues with working arrangements at City Clean that impact the level of service to residents. One manager told me that he came into work every day with a bad taste in his mouth because he knew that he would be shouted, pointed and yelled at and people would be storming off and slamming doors. What should be straightforward managerial decisions on the utilisation of staff when, for example, people are off sick escalate into morning-long events with members of staff storming off and crews going out hours late. This witness told me that managers have to run everything through the GMB reps to avert threats of strike, that GMB reps referred to alleged agreements between the Union and the Council but failed to produce evidence of such, and that the addition even of a single property to a round required a consultation process with the GMB reps lasting weeks.
31. One manager talked about the fear of physical violence and of not being backed up. I was told that senior managers have not been able to assure those for whom they are responsible that they will be protected from retaliation in the event that they complain about the behaviour of GMB reps within the Council or individuals perceived as being particularly protected by those reps, because those senior managers had no confidence that they would be supported by more senior managers, who in turn had no confidence that they would be supported by the politicians. I was told that managers at the Depot were subject to daily abuse from drivers whose behaviour was modelled on that of some GMB reps, and that managers were routinely sworn at and (publicly) about.
32. Another aspect of the culture at City Clean is the tendency of staff to characterise as bullying and/or harassment managerial conduct which is entirely appropriate and reasonable. I was provided with one example of a GMB rep going off sick with stress when challenged about demanding of a manager who was a few minutes late for work ‘What fucking time do you call this?’. Efforts by managers to require drivers to use tachograph cards to ensure compliance with rules about breaks etc were characterised as bullying. Operatives who were challenged for dropping work on their rounds complained that they were being treated less favourably than other crews.
33. Attempts to discipline individuals described to me as being particularly protected by GMB reps within the Council regularly result in threats of industrial action. There have been also cases in which disciplinary dismissals have been overturned on appeal to panels of Councillors. One

manager told me that, until recently, City Clean management expected their decisions to be overturned, to be punished by the GMB reps for having made these decisions, and for the Council to fail to protect them from the punishment. The same was true, the manager suggested, for anyone who came forward to raise a concern or provide evidence as a witness.

II. Racist/ sexist/ other discriminatory abuse

34. A number of witnesses expressed concern about racism at the Depot. I heard that Black staff had to put up with name calling because they wanted to get accepted by GMB members who were in positions of power, so they could get jobs and preferred shifts.⁵ I was told that a number of City Clean staff had been subject to racist name calling by their colleagues and that a truck had been regularly defaced with racist graffiti while parked in the Depot.
35. A number of witnesses referred to misogyny and sexism at the depot. I heard that the word 'cunt' was regularly used to and about managers. One operative told me that she had been subject to overwhelming sexual 'banter' daily by men in the smoking area of the yard. Another spoke about the very misogynistic culture at the depot which she told me she had to put up with most of the time because of the potential risks of challenging it. A number of witnesses said that much of the criticism aimed at women in senior management was related to the fact that they were women.
36. One manager described very personal comments having been made about her appearance. Another, who referred to the Depot as being almost like a zoo, described being called names like 'darling', 'honey', and 'doll' despite making it clear that she did not like this terminology. A third told me about low levels of misogyny across the whole depot. She got winked at constantly by men of a 'certain generation', and called 'love' and 'dear'.
37. One witness spoke of a culture of racism, homophobia and sexism and told me that a group of loaders 'catfished' gay staff on Grindr. One witness, who told me that he was gay, found himself the subject of homophobic 'banter' while another said that a lot of people on refuse had refused to work with him because he was gay.

4. 'Agreements'

38. A number of witnesses referred to difficulties caused by various agreements which had been made, or which were claimed to have been made, between the Council and the GMB. One witness referred to restrictive working practices within City Clean which had been agreed to under threat of strike and which make it:

'impossible for managers to performance manage or deliver the service. For example ... they cannot require staff to pick up work that has been dropped; they cannot require a member of staff to cover another round for operational reasons... There are also several restrictive working practices that are produced randomly ... with no written

⁵ The GMB Southern Region advised me that the GMB had not received any reports of racism in the depot since approximately 2005, when an incident of racist graffiti led to disciplinary action, and that the GMB 'do not condone, hide or excuse racism'.

documentation to support them but threats of strike are issued if they are not complied with’.

39. I requested all agreements between the Council and the GMB which are applicable to City Clean. I was provided with a City Clean Service Re-Design Agreement 2013 as amended in December 2017 and with the associated Residential Services Guarantee 2013, also amended in 2017. I was also provided with a Trade Union Recognition Agreement dated 2017 which was reached with both the GMB and UNISON, a 2020 ACAS agreement and a Policy & Resources Committee agenda item from October 2021 which set out an agreement between the Council and the GMB in settlement of the 2021 dispute.
40. Neither the 2013 nor the 2017 agreements in my view contain anything which would entitle staff at City Clean to act in the ways described in this report.
41. The 2020 ACAS agreement states, so far as relevant for the purposes of this report, that CCG meetings should continue as before and that managers should ‘deal with and respond to issues raised by union representatives in accordance with the constitution rather than the same items needing to be raised repeatedly without resolution’. It stated that managers should deal with health and safety issues when they are raised and ‘ensure that performance and conduct issues are consistently managed in line with agreed council processes and procedures’. It also provided that the Council and the GMB would ‘work ... to identify all known local agreements and create a definitive log:

‘Any future proposals to change agreements would require consultation. In the meantime, local management want to build on the increased liaison with trade union representatives at the depot, e.g. through CCG meetings. There is no intention to erode terms and conditions. Meanwhile, any documented local agreements will be adhered to’.
42. I was told that CCG meetings take three hours every six weeks and are attended by all GMB reps (but no one from UNISON). It was made clear to me that they are regarded by managers as an ordeal. I was told that one GMB rep encouraged others to store up allegations to bombard managers with at these meetings, rather than addressing them at a time when they could readily be investigated and remedied.⁶ I have also been told that the impact of the meetings, which take place between 9 am and noon, is to take the GMB reps away from their rounds which then creates logistical difficulties for City Clean.
43. One manager told me that CCGs were unique to City Clean and that no other department ‘has mandatory 6 weekly meetings to be hauled over the coals by one of the Unions’. As to the other elements of the ACAS agreement extracted above, I have seen no evidence that City Clean managers have failed to deal with health and safety issues though I have been provided with evidence of GMB reps obstructing actions designed to protect health and safety. I have also heard evidence of one GMB rep seeking to weaponise health and safety as an excuse for unofficial industrial action. I have dealt above with the obstacles which management at City

⁶ The GMB Southern Region told me that ‘on occasion when representatives approached managers they were asked to “hold onto” the issue for the CCG’.

Clean face in attempting to ensure that performance and conduct issues are consistently managed in line with agreed council processes and procedures.

44. It seems clear to me that GMB reps within the Council have failed to cooperate in any attempt to achieve clarity as to what agreements exist. When the existence of other agreements is questioned, a number of witnesses told me that the stock response is that 'if you haven't got them that's your problem. You should have kept them', or words to that effect, and a refusal to share them. One witness told me that when people have persisted, having formed the opinion that there was no agreement, 'all hell breaks loose' and there will be a threat of industrial action.
45. The Gerry Doherty report concluded, and I agree, that the situation was 'most unsatisfactory':

'I cannot understand how any manager can be expected to manage effectively and efficiently if they are not in full possession of all of the applicable agreements. This is particularly relevant given the large turnover in managerial staff at Hollingdean Depot. I would have thought it in everyone's interest to place on the table what they consider to be local agreements, for those agreements to be agreed between the parties and for them to be collated into a handbook which everyone can refer to when an issue in dispute arises. It would make sense for that handbook to be reviewed on a regular basis to ensure that all agreements therein are still relevant and fit for purpose.'
46. Finally, as to the 2021 agreement, it has been suggested to me that the provisions dealing with round changes, in particular, impose disproportionate complexity and delay into what should be a simple process of collecting refuse and recycling through the efficient management of resources.

5. Managers

47. Many staff to whom I spoke were highly critical of managers (a term I use here to include senior supervisors). Some suggested that they did not have appropriate experience and failed to listen to staff who did have experience. A number of people told me that communication at City Clean was poor and that operatives would be given different instructions by different managers. Another told me that staff at City Clean were not happy because they feel they are not being heard by managers.
48. Some frontline workers told me that staff were overworked. One driver said that the job of loading is particularly physically difficult, with loaders walking 10 miles a day.
49. A number of operatives complained about the state of repair and reliability of lorries. Others told me that the problem was with drivers who drove too fast, failed to clean or otherwise look after their vehicles and failed to carry out vehicle checks.
50. I heard specific complaints about the alleged behaviour of a small number of managers including allegations of inappropriate collusion between such staff and GMB reps within the Council, and isolated complaints of sexualised 'banter', sexual and racist harassment, bullying and related behaviour. A number of witnesses alleged unfair processes relating to recruitment

and to the deployment of agency staff. I have made some recommendations in relation to these matters including in respect of disciplinary action taken against an individual who raised concerns about bullying with me.

51. A significant number of witnesses reported serious concerns about the behaviour of a former manager about whom I heard allegations of violent aggression, drug use and drunkenness at work. I was also told that the individual would talk publicly all the time about their sexual behaviour.

6. GMB representation

I. General

52. The GMB is by far the strongest union at City Clean and has a much more significant impact on the environment at the depot than does UNISON.
53. Many witnesses, including GMB members, expressed the view that the GMB⁷ had its 'favourites'.⁸ A loader who worked on recycling told me that it did not feel as if the GMB 'has people's backs'. Even witnesses who were more critical of management than of the GMB suggested that refuse staff could 'do what they want'. A number of witnesses told me that the GMB was much more interested in protecting refuse and recycling staff, in particular drivers, and that it had little interest in streets.
54. One witness told me that there were 'particular individuals that the GMB will protect to the hilt but this doesn't get extended out to other groups of members of theirs, large groups of female workers elsewhere in the Council'. A second referred to people at the 'top table', GMB members at the depot who had been drivers for a long time and were all older white men. A third witness referred to a definite group of people who were 'more untouchable' and a fourth stated that there were a number of staff and reps who had exceptional levels of protection from the GMB but that there was then a kind of pecking order of the staff of how much effort GMB would put in.
55. One witness described contact centre GMB members as being at the bottom of the GMB 'food chain' when it came to the power struggle at City Clean and said that the GMB did not think about the impact on such members of its behaviour in refuse and recycling. Other witnesses told me that staff on streets ended up having to do the work that refuse and recycling dropped, which resulted in overflowing bins.
56. One operative described being placed under significant pressure by individuals within the Council to join GMB even before they had their induction. I was informed by another witness that staff were told by GMB reps within the Council and/or individuals described as being particularly protected by them that the GMB was the only union at City Clean and that they must join GMB if they wanted to get shifts and be accepted. The witness did not know if such

⁷ I understood this to mean GMB reps within the Council and use 'the GMB' in that sense in this and the following two paragraphs.

⁸ GMB Southern Region told me that the GMB 'support all members, and the allegations of favoritism or pressure are matters of which there are no records of having been raised within the GMB, as it would have expected'.

threats could be implemented but was satisfied that this was the impression given to new starters. The individual told me that it was only later that new joiners would know whether or not the GMB had the suggested level of influence.

57. A number of witnesses told me that some GMB reps within the Council and/or others described as being particularly protected by them pressurised crews to refuse to work with staff members who were disliked by the reps/ individuals perceived as protected. I also heard accounts of some GMB reps within the Council and/or others described as being particularly protected by them imposing pressure on operatives not to cooperate with management even if they wished to do so. Another operative described City Clean as GMB-dominated, and said that anyone in UNISON was looked down upon and treated differently by the workforce.
58. One witness told me that GMB reps within City Clean issued grievances by having people sign pieces of paper without even knowing what the complaint was, being told that they would be filled in later and misled about the subject matter.⁹
59. Serious concerns were raised about the treatment of people who resigned from the GMB and, in particular, about an operative who was elected UNISON rep at City Clean and who subsequently found themselves the subject of various grievances in respect of which there was evidence of collusion. Those grievances were concluded in December 2022 without sanction to the individual who has, however, been unable to return to work since because of concerns about how they would be treated by GMB members/ reps on their return.
60. One manager told me that they had resigned from the GMB having been threatened by three GMB reps in connection with a disciplinary hearing while working alone in the evening. A number of people told me that behaviours at City Clean of GMB reps and others regarded as particularly protected by such reps are replicated elsewhere at the Council.

II. Allegations of misconduct by GMB reps and those described as particularly protected by them

61. I heard many accounts of bullying and intimidation by a number of GMB reps within the Council and other individuals described as being particularly protected by them. One rep described as becoming angry, shouting and banging his fist at meetings. A witness described the rep's behaviour as hectoring, sarcastic, patronising and misogynistic. Another witness stated that the rep was 'very, very aggressive' and would talk at length at meetings and, when anyone attempted to intervene, would start shouting about being interrupted. I was told that managers felt powerless to deal with this behaviour because of the threat of industrial action.
62. I have heard accounts of GMB reps within the Council:
 - 62.1. Shouting and/or swearing at and/or threatening staff, including by telling them that if they acted, or failed to act, in a particular way they were 'fucking finished'. An example of behaviour said to be typical from one GMB rep consisted in the following (said to manager): 'You're a fucking shambles. This is disgusting ... you don't know what you're

⁹ Gerry Doherty described similar accounts of GMB members not realising what they were voting for as 'anecdotal'.

- fucking doing'. Some GMB reps were said to engage in 'effing and blinding on a daily basis' in the City Clean operations room;
- 62.2. Accusing managers of lying, and implying that the GMB rep could get another individual dismissed;
 - 62.3. Banging on walls and tables and storming out of meetings;
 - 62.4. Acting in a physically aggressive way including by approaching and pointing in managers' faces while shouting, making implicit and explicit threats to use physical violence and in fact using such violence;
 - 62.5. Threatening to stab people;
 - 62.6. Bringing weapons into the Depot and showing them to staff;
 - 62.7. Ordering individuals out of meetings: 'you two get out or I'm leaving. Get out, get out. Go on, get out or I'm going';
 - 62.8. Reacting to being challenged by the chair of a meeting for bullying a witness by immediately stopping the meeting, refusing to continue, and accusing the manager of bullying the GMB rep;
 - 62.9. Being extremely rude to women managers in meetings, including by saying to a male manager 'if you can't keep her quiet, I'm going to leave' and by accusing another woman manager, without any evidence, of lying;
 - 62.10. Making inappropriate sexual comments to and about women, including stating 'who would wanna fuck that?' as one woman walked past;
 - 62.11. Publicly saying that women managers 'don't have a fucking clue. They're female. They don't know what they're doing' and describing a woman manager as 'a fucking bitch pulling the strings';
 - 62.12. Orchestrating the ostracisation of a senior woman manager by GMB members;
 - 62.13. Behaving with extreme aggression when challenged about using offensive language to refer to a Black member of staff;
 - 62.14. Characterising questions about inclusion and diversity at interview stage as 'asking if people would grass up racists';
 - 62.15. Responding to training on the behaviour framework by protesting that staff were 'not dogs, why are you trying to teach them good behaviour?';
 - 62.16. Derailing diversity training by going into an 'anti-management rant';
 - 62.17. Telling staff that they did not need to attend mandatory diversity training;
 - 62.18. Indicating that the GMB rep possessed very personal knowledge pertaining to a manager which the manager thought could have been construed as a threat;
 - 62.19. Engaging in email and telephone correspondence whose tone and frequency at times amounted to harassment;
 - 62.20. Suggesting to managers that the GMB rep knew where their skeletons were buried;

- 62.21. Telling a manager that even if they left the Council the GMB rep would follow them, find them and make sure they never got another job;
 - 62.22. Threatening unlawful industrial action and taking such action by calling collections teams back to the City Clean depot and being involved in sit-ins, sometimes using the pretext of health and safety concerns;
 - 62.23. Stating that staff who had not been balloted in relation to proposed industrial action would not be allowed to cross the picket line;
 - 62.24. Refusing to agree the adoption of new standardised PPE because the GMB rep had a personal objection to the colour of the PPE (which is mandatory for work on highways).
- 63. The behaviour of one GMB rep is such that, I was told by witnesses, managers routinely have to adjourn meetings with the rep so that they could go and calm down.
 - 64. Some witnesses expressed concerns about alleged corruption on the part of at least one GMB rep. I have no way of determining whether these allegations were correct.
 - 65. I have also heard accounts of an individual universally described to me as subject to particular protection by individuals associated with the GMB:
 - 65.1. Calling a member of staff a 'Black cunt';
 - 65.2. Referring to managers as 'a bunch of wankers';
 - 65.3. Referring to two senior women manager as 'a pair of effing cunts';
 - 65.4. Threatening to stab a member of staff.
 - 66. As above, I am satisfied that managers at City Clean and elsewhere in the Council have, until recently, been unable to respond appropriately to such behaviour by reason of the threat of industrial action and a (reasonably) anticipated absence of political support. Behaviour of the sort described above became normalised as behaviour such as that outlined above has been emulated by other personnel within City Clean. One witness told me that 'Aggression has become culturally engrained'.
 - 67. A combination of agreements reached between the Council and the GMB and other (possibly fictional) agreements upon which GMB reps seek to rely has resulted in a situation at City Clean in the expectation that GMB reps are involved in decisions such as temporary allocation of staff to particular teams or of a lorry to a team, and minor amendments to rounds, which would normally be a matter of managerial discretion. The effect of this is to produce delays, opportunities for some of the behaviours described above, and significant impact on service provision. The situation has been exacerbated by the fact that there is a GMB office at City Clean in which staff regularly congregate and which provides a focal point for resistance to management. Also problematic is the fact that GMB reps, in common with other City Clean staff, appear to have free access to City Clean offices, including those in which managers work.
 - 68. I was provided with evidence of obstructive conduct by various GMB reps in relation to disciplinary/grievance meetings. This included, in particular, prolonging processes by being

repeatedly unavailable for meetings and, when meetings have been arranged to accommodate the GMB rep, cancelling them at short notice. I was provided with evidence of 5 month delays between the initiation of one disciplinary process and the first meeting, and a similar delay between the initiation of another process and the decision that there was a case to answer. Not all of the delay was attributable to the behaviour of the GMB rep in these cases but a substantial amount of it was. One of these cases concerned allegations of serious sexual harassment and I am satisfied that the delays impacted very significantly on the complainants. I was also provided with evidence of occasions on which such delaying tactics impacted unfavourably on the individual being represented by the GMB, in particular one case in which the GMB rep's refusal to make themselves available resulted in the individual being informed of their eventual suspension by email rather than in person.

69. I was also provided with evidence of unacceptable conduct by GMB reps in grievance and disciplinary meetings including in the form of refusal to accept the Council's behavioural framework; extreme rudeness; seeking to control processes by, for example, telling people how long they could talk for and telling individuals under disciplinary investigation not to answer questions; and constant interruptions. One manager described themselves as having been bullied by a GMB rep who accused them of being 'out of [their] depth' and not knowing what they were doing. I heard that a GMB rep had boasted of having 'got rid' of one member of HR staff, a statement interpreted by my witness as a threat. I was also told about a grievance process having been concluded in writing because of the GMB rep's allegedly aggressive behaviour and their refusal to comply with the Council's behavioural framework.
70. Concerns were raised with me by a number of witnesses as to the GMB's allocation of representatives to the respective parties in grievances, it being suggested in particular that sexual harassment complainants were not served as well as those accused of such conduct. I was also provided with evidence suggestive of a dismissive attitude to sexual harassment by a GMB rep who referred to a complaint by a member of the public about alleged sexual harassment by a member of staff as 'spurious' prior to the complaint having been investigated. The same GMB rep sought to ensure that another sexual harassment complaint was dealt with by an exclusively male panel.
71. GMB reps recently refused to engage in consultation on the Council's draft Bullying and Harassment policy which one witness told me was long overdue, stating that they did not have capacity and did 'not agree to anything at this stage' and threatening that if the Council 'imposes this policy, then the GMB will challenge it at all levels'.
72. I heard a very disturbing account of pressure said to have been imposed by a GMB rep on a vulnerable member of staff to withdraw a complaint about bullying by two staff members who were described to me as being 'very close to the GMB'. The vulnerable individual, who later committed suicide, proceeded with the complaint. When they later expressed a wish to return to City Clean after a period of sickness leave and a temporary secondment, I was informed that another GMB rep made it clear that such return would not be tolerated.
73. The evidence suggests that GMB reps insist on being present at, and/or consulted about, meetings between managers and GMB members irrespective of whether the Council's

procedures allow for representation or accompaniment in the particular circumstances. There is, I am satisfied, a practice on the part of GMB reps of routinely escalating matters upwards through the Council including (at least historically) to politicians who had no proper role in the relevant matters.

74. I heard from a number of people about the death of a driver who tragically suffered a heart attack after returning home from a disciplinary meeting. I am satisfied that the approach taken by the Council to the driver had been fair and reasonable and that those in attendance at the meeting after which he died had, with the exception of the GMB rep, been calm. I heard from a number of witnesses who nevertheless attributed this unfortunate death to the driver's having been hounded by managers. I am satisfied that this impression was created by some of the GMB reps, one of whom called a senior manager at 7am the day after the death to accuse the manager of killing the driver. Despite this allegation having, I understand, been withdrawn,¹⁰ I heard evidence of subsequent such allegations against managers, including from another GMB rep. The evidence suggests that one GMB rep, in particular, sought to weaponise the driver's death against City Clean management.
75. I have made a number of recommendations in relation to these matters.

7. Summary

76. I am satisfied that the working environment at City Clean can fairly be described as toxic.
77. I am satisfied that some GMB reps within the Council operate to protect some GMB members at City Clean (drivers, the majority of them white men, and operatives on refuse and recycling) while displaying significantly less interest in other members. I have been provided with credible evidence that the nature of that protection appears to extend well beyond the normal stuff of trade unions to include:
- 77.1. Providing effective immunity from sanction for individuals protected by GMB reps within the Council;
 - 77.2. Routine sabotage of investigatory and disciplinary processes by some GMB reps by delaying tactics, use of strategic counter-allegations and unacceptable behaviour by reps in correspondence and interviews;
 - 77.3. Retaliatory action against managers who are involved in disciplinary action against individuals protected by GMB reps within the Council;
 - 77.4. The use of intimidation to encourage GMB membership and participation in GMB industrial action.
78. I am satisfied that some GMB reps have encouraged staff to regard entirely reasonable management orders as tantamount to harassment or bullying, and/or as breaching agreements which do not exist. This has had the effect of making City Clean exceptionally difficult to

¹⁰ GMB Southern Region told me that 'the GMB branch were very clear that the disciplinary could not be blamed for what happened thereafter'. I accept that there may have been a statement to this effect but the evidence suggests that the contrary continued to be suggested including by at least one GMB rep.

manage, and of encouraging staff to regard even the most benign managers as the enemy. The tendency to characterise as bullying or harassment entirely reasonable attempts to engage in performance management or even to make entirely reasonable requests of staff has resulted in a situation in which members of staff are unable or unwilling to distinguish between management and abuse. I have discussed various examples above.

79. It is important to say that few of those against whom allegations of misconduct were made came forward to speak to me, and that I have not put such allegations to the individuals concerned. I have heard numerous credible accounts, however, that some GMB reps and individuals described to me as particularly protected by them have routinely demonstrated behaviour which has no proper place in a working environment. This behaviour has included:

79.1. Shouting, screaming and swearing at managers;

79.2. Issuing threats;

79.3. Sexual harassment of women workers;

79.4. Use of racist language;

79.5. Undermining training including by informing staff that they did not have to attend it.

80. Again without making any findings that particular individuals have been guilty of the behaviours discussed in section 6.II and paragraphs 77-79 above, I am satisfied that this type of behaviour has occurred. I am also satisfied that it has not only impacted on managers who have been the predominant targets of such behaviour, but that it has created a stressful and damaging working environment for many who have witnessed it. It has also served as a model for staff. I set out above examples of the difficulties which result from what should be routine managerial requests/ instructions. Where efforts have been made to respond to such behaviour via appropriate disciplinary processes, some GMB reps have reacted by threatening and in some cases initiating industrial action, lawful and otherwise.

81. Management has, at least until very recently, been powerless to proceed with disciplinary action for reasons discussed above.

82. I have referred in Section 5 above to some allegations against managers and I have made some recommendations relating to these allegations. I emphasise, however, that potentially well-founded allegations against City Clean managers have been very much the exception rather than the rule. I been very impressed by the commitment of managers to whom I have spoken to at City Clean, to the public it serves and, especially, to its staff. I have been particularly struck by the fact that some managers at City Clean started work there in entry-level jobs and have progressed as a result of their efforts and of the ability of other managers within the organisation to achieve their potential. I make no finding that the many difficulties currently experienced at City Clean or, in particular, the failures over time to enforce appropriate standards of behaviour or to require staff to comply with their contractual obligations, can fairly be attributed to City Clean managers.

83. One manager told me that, in many ways, City Clean was similar to many other waste and refuse and recycling services in that there was a typical predominantly male manual work force

in which issues such as sexism, homophobia and racism were prevalent. The real differences in Brighton and Hove were what happened when management tried to deal with those problems. I have found no reason to disagree with this analysis.

84. I found no evidence that any of the managers I spoke to were hostile to trade unions. Many, perhaps a majority, identified themselves to me as trade union members.

8. Recommendations

85. A number of the recommendations in my full report relate to individuals or small groups of individuals and are not suitable for inclusion here. Others relate to matters properly regarded as confidential. I include summaries of those recommendations below as well as the full text of recommendations which are in my view suitable for publication.

I. Member Appeal Panels

86. I recommend that the Council ceases to operate Member Appeal Panels.

II. Agreements

87. I recommend that it should be made clear to the GMB that no account will be taken of alleged agreements other than those which are discussed above, unless and to the extent that the GMB can provide cogent evidence, by a pre-determined date, of any other agreements that are said to exist. In the event that there are any such agreements, their terms should be reviewed as part of the wider review I also recommend;

III. Consultation

88. I recommend that a review is undertaken of the extent to which provisions in the 2020 ACAS agreement (in particular as regards CCG meetings) and in the 2021 agreement are consistent with effective management. If (as I suspect) elements of those agreements are not consistent, I recommend that serious consideration is given to providing the GMB with notice of change. In particular:

88.1. Consideration should be given to doing away with the CCG meetings which I understand are unique to City Clean. To the extent that periodic meetings are regarded as being of value I recommend that they are held between management and each union's senior rep at City Clean or their designated representative;

88.2. Serious consideration ought to be given to removing any requirement for consultation with the GMB about proposed route changes, at least where they are of a relatively minor nature. It also appears to me that the 2021 agreement is internally contradictory or at least unclear in some respects;

89. I recommend that consideration be given to defining consultation obligations regarding (for example) draft policies or changes in practice in such a way that they cannot be blocked by non-cooperation on the part of the GMB;

IV. Disciplinary/ Grievance procedures

90. I recommend that time limits be initiated and adhered to in relation to the early stages of disciplinary /grievance procedures so that delays such as that which have occurred in [cases discussed in the report] cannot happen again. It is not appropriate for me to re-draft procedures but I would recommend that particular consideration is given (1) to the ability of managers to proceed with meetings where there is no right to representation and/or where reasonable efforts have been made to accommodate a representative of first choice; and (2) to the adoption of an approach which will ensure that regular progress reports are provided to those involved;

V. Recruitment

91. I recommend that appropriate steps be taken to investigate concerns raised about recruitment practices at City Clean in light of the concerns raised [in the report].

VI. Other recommendations

92. In addition to the recommendations above I made recommendations relating to:

92.1. **The City Clean environment:** in short summary I recommended changes to the working relationship between the Council and the GMB in City Clean as well as some changes of an operational nature;

92.2. **Behaviour:** I made a number of recommendations including that union reps be required to confirm their agreement to comply with the Council's behavioural framework as a pre-condition of involvement in any disciplinary, grievance or similar processes, and that standards of appropriate behaviour be imposed in all meetings;

92.3. **Disciplinary action:** I made recommendations that consideration be given to disciplinary action against a number of named individuals;

92.4. **Equality matters:** I made a number of recommendations supportive of the BME Workers Forum, reasonable adjustments for disabled staff and equity of treatment between GMB and UNISON at City Clean including that the Council ceases to provide a GMB office and a parking space for the exclusive use of the GMB at City Clean.

93. I made other recommendations of a confidential nature unsuitable for inclusion in this public report.

Appendix 2

KC Recommendations – delivery action plan

Significant work is underway on many of the recommendations below, with improvements in the service already demonstrable, as set out in the body of the report. The action plan below sets out a timescale and key milestones for continuing this work at pace.

KC report para	Description	Reason	Completion date
para 86	Replace employment-related Personnel Appeals Panels (see para 3.11- 3.15 above)	In line with most councils, employment matters (aside from a very few matters that relate to Chief Officers and statutory roles) should be dealt with by officers and not elected members.	31-Jul-24
para 87	Review alleged agreements that are said to apply but which are not written or agreed	To ensure there is transparency and clarity for all staff over which local agreements actually exist.	13-Mar-24
Para 88	A review of all consultation arrangements, and the conduct of industrial relations, including a review of agreements deemed to be unworkable	To bring CityClean consultation arrangements into line with ways of working throughout the rest of the council, and to address the specific agreements identified by para 88 of the KC's report.	13 Mar 24
para 89	Improve joint working with unions and build a stronger culture of partnership	Put in place structures for positive collaboration on procedural changes, and other aspects of the employment offer related to wellbeing and equalities. Ensure any non-engagement with processes cannot slow or stall progress on initiatives.	31-Jan-24
para 90	Tighten up time-limits for disciplinary and grievance procedures	To ensure matters are dealt with in a timely way, and to ensure all involved are kept up to date.	31-Jul-24

para 91	Investigate recruitment practices	To ensure fair recruitment, and that concerns raised within the report are addressed	31-Jan-23
Para 92	A range of recommendations covering behaviour, working relationships and equalities	This includes a requirement that all staff, including TU reps, comply with the council's behaviour framework; equal treatment of both recognised unions; and ensuring workers forums are supported in their role at Cityclean. The GMB office and parking space at Cityclean are not appropriate and will be removed as part of this action.	Various dates, incl culture change plans below.
Culture Change plans		These plans implement recommendations about the working culture, unacceptable behaviours, and confidential recommendations in the report.	
Culture change is 'done with', not 'done to' the workforce. Workers and unions will have a key role in how CityClean becomes simply a nicer, kinder, more respectful and dignified place to work. The culture change programme outlined below will embed the changes already made in the service to implement a zero tolerance of poor behaviour and instigate disciplinary processes to address issues of bullying behaviour.			
	Phase 1: Stabilise	<ul style="list-style-type: none"> - Ensure all staff and managers have support and opportunity to be heard. - Ensure the service feels valued and appreciated - not all 'tarred with the same brush' - Ensure access to specialist counselling - Apply 'zero tolerance' approach to managing poor behaviour - Support and development for frontline managers and supervisors to support effective and consistent behaviour management - 	Feb 24
	Phase 2: Creating conditions for culture change	<ul style="list-style-type: none"> - Behaviour expectations reset - Council / TU relationship and behaviours reset - Mandatory behaviour reset learning and development covering bullying, harassment, equality and discrimination with consequences for failure/refusal to engage - Continue to apply 'zero tolerance' – informal and formal procedures 	April-24

	<p>Phase 3: Culture Change</p> <ul style="list-style-type: none"> - Co-create future vision for service with staff, managers, TU colleagues, and other stakeholders within the Council - Using 'Challenge & Collaboration' events to define the future vision and how the service is going to get there - Future focused, reestablishing psychological safety, setting clear vision, 'making it real' - Support frontline staff and managers to co-deliver on culture change activities 	Dec-24
	<p>Phase 4: Embedding culture change</p> <ul style="list-style-type: none"> - Led by leaders and managers - Mechanisms to support this to be defined 	Ongoing

Brighton & Hove City Council

Strategy, Finance & City Regeneration Committee

Agenda Item 91

Subject: Council Tax Base and Business Rates Retention Forecasts
2024/25

Date of meeting: 25 January 2024

Report of: Chief Finance Officer

Contact Officer: Name: James Hengeveld
Tel: 01273 291242
Email: james.hengeveld@brighton-hove.gov.uk

Ward(s) affected: All

For general release

1. Purpose of the report and policy context

- 1.1 The council tax base represents the amount that would be raised by setting a £1 council tax on a band D property. It is a requirement of the Local Government Finance Act 1992 and associated regulations that the tax base is calculated for the purpose of setting the council tax in 2024/25 before 31 January 2024.
- 1.2 There is a statutory requirement placed on all business rates collection authorities to calculate how much business rates income each authority is likely to receive for the coming year. Members will be aware there is considerable volatility in business rates income which makes it difficult to forecast, and the council is highly reliant on the data and decisions of the Valuation Office Agency (VOA).
- 1.3 The purpose of this report is to provide information to enable Members to agree the council tax base for 2024/25 and note the estimate income through the Business Rates Retention Scheme.

2. Recommendations

- 2.1 That Committee agrees the calculation of the council's tax base for the year 2024/25.
- 2.2 That Committee notes the collection rate assumed is 98.75%.
- 2.3 That Committee notes that no change to the Council Tax Reduction scheme is proposed for 2024/25 except that, in accordance with the policy agreed by full Council on 3 February 2022, earnings bands will be uplifted to reflect government changes to the National Living Wage as set out in paragraph 3.7.
- 2.4 That Committee agrees that in accordance with the Local Authorities (Calculation of Tax Base) (England) Regulations 2012, the amounts

calculated by Brighton & Hove City Council as its council tax base for the year 2024/25 shall be as follows:-

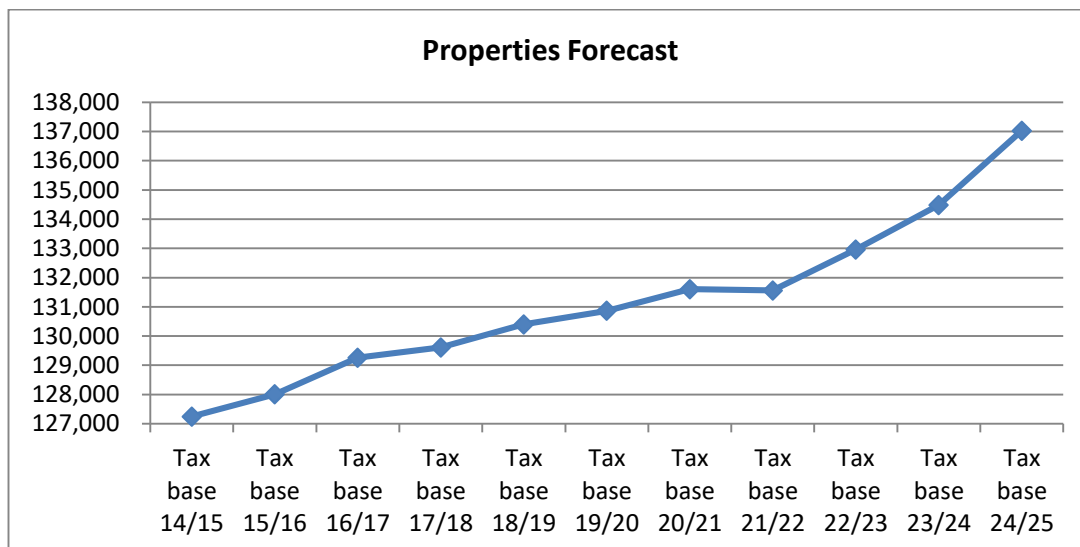
- 2.3.1 Brighton and Hove in whole – 93,574.4 (detail in appendix 1)
 - 2.3.2 Royal Crescent Enclosure Committee – 29.7 (detail in appendix 2)
 - 2.3.3 Hanover Crescent Enclosure Committee – 42.7 (detail in appendix 2)
 - 2.3.4 Marine Square Enclosure Committee – 69.5 (detail in appendix 2)
 - 2.3.5 Parish of Rottingdean – 1,706.2 (detail in appendix 2)
- 2.5 That Committee agrees that for the purposes of Section 35(1) of the Local Government Finance Act 1992, the expenses of meeting the special levies issued to the council by the Enclosure Committees shall be its special expenses.
- 2.6 That Committee agrees that the Enclosure Committees and Rottingdean Parish are paid the required Council Tax Reduction Grant of c£4,000 in total, to ensure they are no better or no worse off as a result of the introduction of the Council Tax Reduction Scheme for the reasons set out in paragraph 3.13.
- 2.7 That Committee notes that the amount forecast to be received by the council in 2024/25 from its share of local business rates and section 31 Local Government Act 2003 compensation grants is £84.911m, based on the latest available data.
- 2.8 That Committee notes that the amount forecast to be received by the council in 2024/25 from its share of local Council Tax, including an Adult Social Care precept, is £185.100m based on latest available data.
- 2.9 That Committee delegates the agreement of the final business rates forecast and completion of the NNDR1 2024/25 form to the Chief Finance Officer following consultation with the Chair of this Committee and this will be reflected in the Budget report to this committee in February 2024.

3. Context and background information

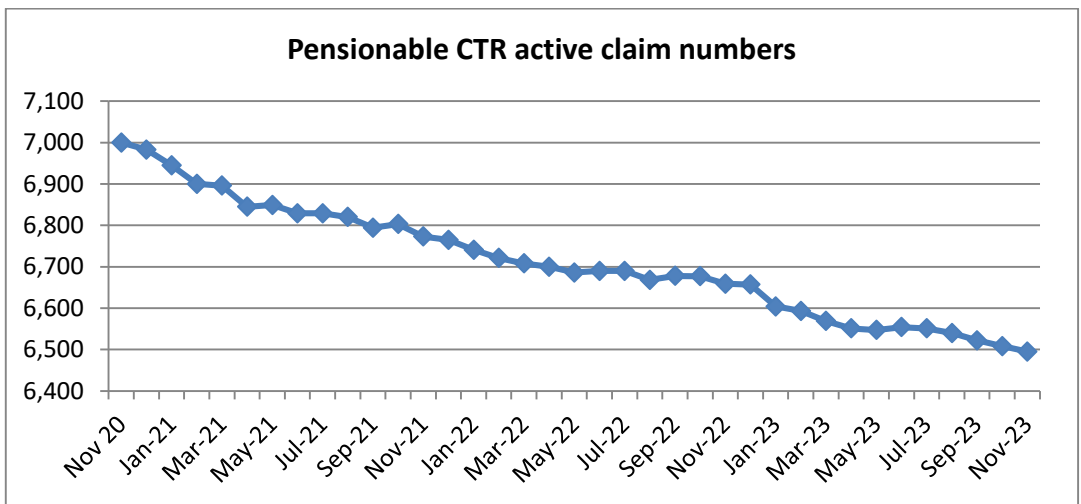
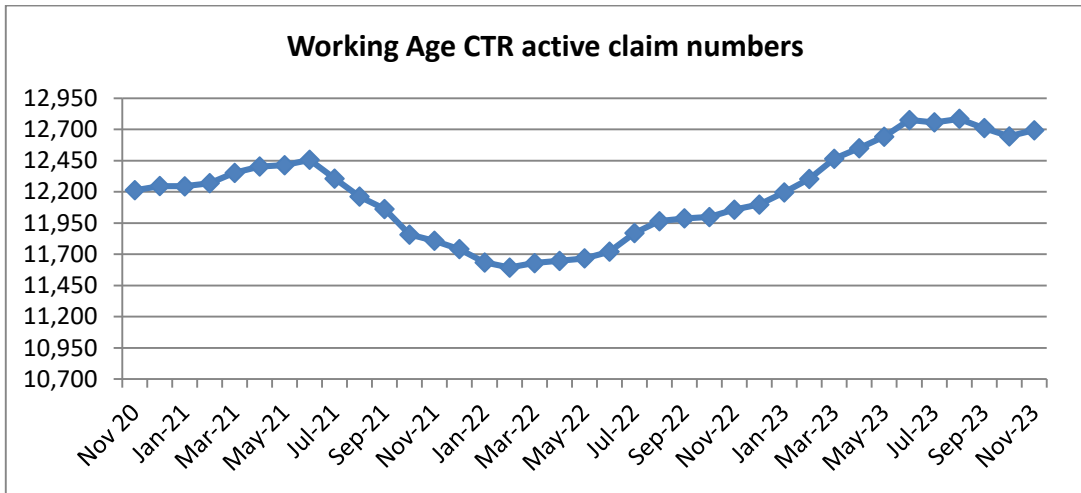
Council Tax

- 3.1 The tax base has been calculated in accordance with the Local Authority (Calculation of Council Tax Base) (England) Regulations 2012. The detail of the calculation for the whole of Brighton and Hove is shown at Appendix 1.
- 3.2 The tax base is calculated by estimating how many properties there will be in each tax band, determining what relevant discounts and exemptions apply, and how much council tax should ultimately be collected based on an expected collection rate.
- 3.3 The key changes to the proposed tax base for 2024/25 are set out below.
- 3.4 As of November 2023, there were 134,798 properties on the valuation list. It is forecast that 2,224 new properties will be added by March 2025 equivalent to a 1.6% increase in the housing stock of the city. The largest developments within this include 300 properties at Sackville Trading Estate, 229 flats in Preston Road, 216 properties at Ethel Street, 206 properties at Denman Place, 138 properties at Davigdor Road and 122 flats in New England Street. In addition there are student accommodation developments

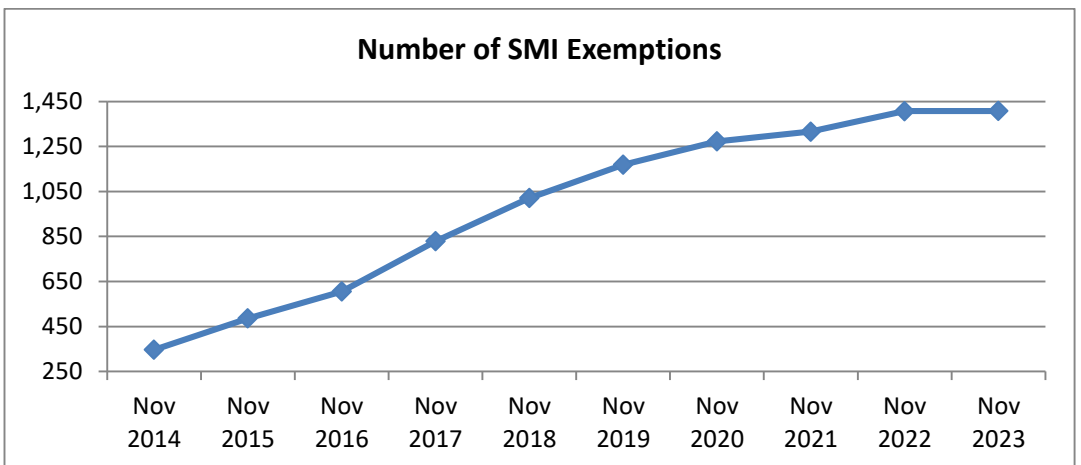
forecast to be added to the list by 31 March 2025 however their valuation is not straight forward and they will be exempt from council tax; they have been excluded from the estimates. The graph below shows the trend of properties over time.



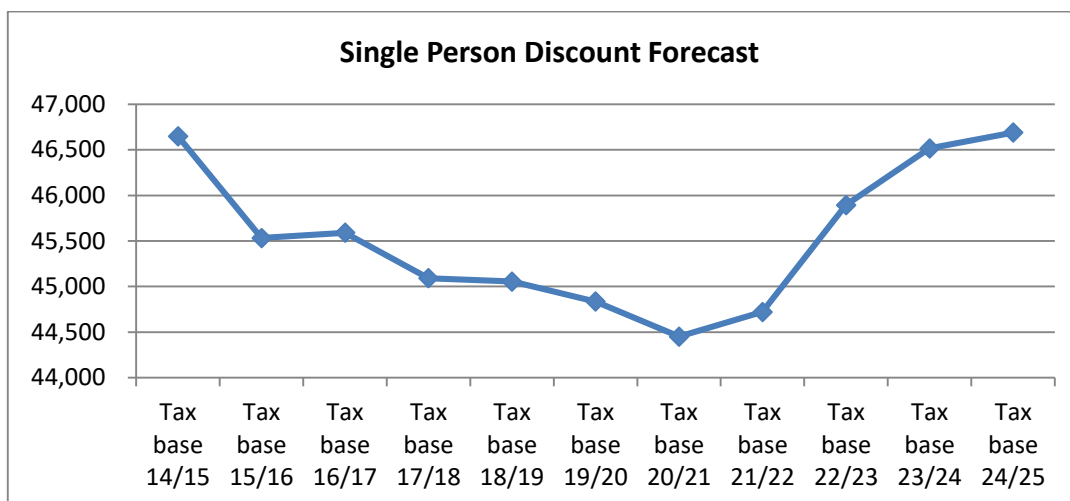
- 3.5 It is estimated that an average of 5,996 properties will be solely occupied by students (excluding halls of residence) during 2024/25. This is a significant increase compared with 2023/24 and is due to new student accommodation built within the city being added to the valuation list and the valuation methodology where individual bedrooms are now rated as separate properties. This means comparing growth in student properties across years is not on a consistent basis.
- 3.6 The overall number of working age claimants receiving CTR has plateaued in recent months. Within this is a greater proportion of claimants now receive universal credit and the average entitlement is reducing overall. The pensionable claimants receiving CTR have continued to decrease through 2023/24. The tax base forecast assumes working age and pensionable claimants will marginally reduce during 2024/25. The overall number of CTR claimants is c19,200 at present and the cost of this support to the council in 2024/25 is estimated to be £18.700m.
- 3.7 The current Council Tax Reduction Scheme (CTR) was approved by full Council in February 2022. No changes were made to the scheme, but the Council approved the uplifting of earnings band thresholds in line with the changes to the National Living Wage announced by government. Similarly, no changes are proposed for the 2024/25 CTR scheme but the earnings bands will be uplifted as per the full Council's earlier decision. Therefore, there is no requirement to consult on the scheme.



3.8 The number of exemptions for Severely Mentally Impaired (SMI) eligibility appears to be levelling out after many years of increases.



3.9 The proposed tax base for 2024/25 estimates the number of single person discounts (SPDs) to be 46,689.



3.10 Elsewhere on this agenda there is a report that highlights changes to the empty property premium. It introduces the premium after 1 year rather than the current 2 years from 1 April 2024. This change represents an increase to the tax base of which the council's share is anticipated to be £0.500m and is included in this tax base projection.

3.11 The resultant tax base proposed for 2024/25 is 93,574.4 which is a 1.7% increase from the 2023/24 tax base of 91,986.3 for the reasons explained above and summarised in the table below.

	Tax base	Change
2023/24 tax base	91,986.3	
New properties and band changes	1,947.3	+2.1%
Increase to Empty Property Premium	417.6	+0.4%
Reduced CTR claimants	167.7	+0.2%
Net increase in exemptions	-821.9	-0.9%
Net increase in discounts	-122.6	-0.1%
2024/25 tax base	93,574.4	+1.7%

3.12 The regulations require a separate calculation for parts of a local authority area where special expenses apply. Appendix 2 show the summary calculation for Enclosure Committees in Brighton and Hove which fall under this category. Each Enclosure Committee sets a levy for maintaining the enclosure gardens, which is recovered through an additional council tax charge to the enclosure residents. Appendix 2 also shows the summary calculation for the Parish of Rottingdean.

3.13 The additional discounts generated by the council tax reduction scheme also have implications for the Enclosure Committees and Rottingdean Parish. In line with government guidance and what is considered fair to local residents it is proposed that the relevant proportion of council tax reduction grant is paid to each body to ensure they are no better or no worse off as a result of the local scheme. It is estimated the total grant payable in 2024/25 will be c£4,000 in line with previous years; the actual figure will depend on the tax level set by each body.

Business Rates Retention

- 3.14 From 2024/25 the business rates multipliers have been decoupled by government so that the small business multiplier and the standard multiplier can now be set at different rates. The government announced in the Autumn Statement that the small business multiplier is frozen for a further year and will remain at 49.9p whereas the standard multiplier is increasing in line with CPI to 54.6p per £1 rateable value. The government compensates local authorities for the lost income due to the freezing of multipliers through S31 compensation grants.
- 3.15 The Autumn Statement announced an extension to the retail, hospitality and leisure relief scheme that provides eligible, occupied, retail, hospitality, and leisure properties with 75% relief, up to a cash cap of £110,000 per business.
- 3.16 The entries for the NNDR1 return are still being reviewed as there is added complexity with the decoupled multipliers and rating appeals. The latest working forecast is that the net share of local business rates and section 31 Local Government Act 2003 compensation grants is £84.911m. Any amendment to this forecast will be included in the February budget report to this committee.

4. Analysis and consideration of alternative options

- 4.1 The calculation of the council tax base is determined largely by regulation and is based on the latest available information. The completion of the NNDR1 form is prescribed in the completion guidance notes from DLUHC.

5. Community engagement and consultation

- 5.1 There are meetings between Finance and Revenues teams to discuss and review collection performance, movements in the tax base and the projections used for determining the tax base for the following year.
- 5.2 The Police & Crime Commissioner for Sussex and the East Sussex Fire Authority have been informed of the latest tax base projections as it forms part of setting their council tax precept.
- 5.3 The council has a duty to consult representatives of business ratepayers on the council's overall budget and this consultation will take place before the February Strategy, Finance & City Regeneration Committee.

6. Conclusion

- 6.1 It is a requirement of the Local Government Finance Act 1992 and associated regulations that the tax base is calculated for the purpose of setting the Council Tax in 2024/25 before 31 January 2024 and this report enables the Council to fulfil that requirement.
- 6.2 The council has a statutory duty to agree a business rates forecast for 2024/25, set out a forecast surplus or deficit for 2023/24 and submit an NNDR1 form by the 31 January 2024.

7. Financial implications

- 7.1 The proposed tax base is estimated to generate £185.100m in 2024/25 based on a 4.99% council tax increase (including 2% adult social care precept). This sum will be reflected in the 2024/25 budget proposals to be presented to this committee and Budget Council in February 2024.
- 7.2 The assumed level of income through the Business Rates Retention scheme is £84.911m, an increase of £5.045m compared with 2023/24.
- 7.3 Any changes made to the final NNDR1 form including the council's share of any business rates collection fund deficit or surplus will be included within the budget forecast for 2024/25.
- 7.4 Overall the tax base estimates contained within this report generate £1.550m additional income compared to the assumptions presented to this committee in July 2023.

Finance officer consulted: James Hengeveld Date consulted: 12/01/24

8. Legal implications

- 8.1 Under the Local Government Finance Act 1992, the council must determine the Council Tax base applicable to Brighton & Hove. In respect of 2024/25, the base must be determined before 31 January 2024 as required by regulation 8 of The Local Authorities (Calculation of Council Tax Base) (England) Regulations 2012.
- 8.2 All other references to the legal framework for setting the council tax base are contained within the body of the report.
- 8.3 Under Part 2 of the Non-Domestic Rating (Rates Retention) Regulations 2013 (SI 2013/452), the council must determine specified information relating to its business rates forecast and notify the Secretary of State and relevant precepting authorities of the amounts. In respect of the year commencing 1 April 2023, these amounts must be determined by 31 January 2024.
- 8.4 The calculation of the Council Tax Base and Business Rates Retention Forecasts are not functions reserved to Full Council by legislation or by local agreement and, as such, it is a matter to be determined by the Strategy, Finance & City Regeneration Committee.

Lawyer consulted: Elizabeth Culbert Date consulted: 12/01/24

9. Equalities implications

- 9.1 There are no equalities impacts as a result of agreeing the council tax and Business Rates Retention base.

10. Sustainability implications

- 10.1 None.

Supporting Documentation

1. Appendices

1. Tax base calculation for the whole of Brighton and Hove
2. Tax base calculation for enclosure committees and the parish of Rottingdean

Band: Range (£'k):	A entitled to disabled relief reduction	A <40	B 40-52	C 52-68	D 68-88	E 88-120	F 120-160	G 160-320	H >320	Total
1. Number of dwellings on list	0	30,240	29,870	35,147	20,114	11,610	4,767	2,840	210	134,798
2. Estimate of number of dwellings not listed *	0	339	604	323	165	76	40	8	1	1,556
3. Estimate of number of dwellings listed which will not be in band	0	(23)	(61)	(126)	(101)	(69)	(34)	(30)	(16)	(460)
4. Estimated exempt dwellings	0	(3,824)	(1,518)	(2,981)	(1,172)	(297)	(99)	(94)	(16)	(10,001)
5. Disabled relief dwellings from band above	23	61	126	101	69	34	30	16	0	460
6. Number of chargeable dwellings (sum lines 1 - 5)	23	26,793	29,021	32,464	19,075	11,354	4,704	2,740	179	126,353
7. Single person discounts (25%)	(14)	(15,918)	(12,216)	(9,878)	(4,841)	(2,489)	(904)	(411)	(18)	(46,689)
8. All residents disregarded (50%)	0	(26)	(76)	(101)	(69)	(48)	(50)	(57)	(24)	(451)
9. All but one resident disregarded (25%)	0	(442)	(575)	(516)	(241)	(117)	(38)	(16)	0	(1,945)
10. Second Home Job Related (ZERO) (50%)	0	(2)	(2)	(2)	(2)	(1)	(1)	0	0	(10)
11a. EMPTY PROPERTY PREMIUM 100% (1 yr)	0	70	73	79	34	31	8	7	0	302
11b. EMPTY PROPERTY PREMIUM 100%	0	102	78	53	35	8	7	5	1	289
12. EMPTY PROPERTY PREMIUM 200%	0	15	14	11	2	0	0	1	2	45
13. EMPTY PROPERTY PREMIUM 300%	0	2	2	1	0	0	0	0	0	5
14. Council Tax Reduction (CTR)	0	(4,705)	(3,644)	(2,635)	(741)	(227)	(54)	(16)	0	(12,022)
15. Total number of appropriate percentage discounts	(3.50)	(8,601.00)	(6,695.75)	(5,128.00)	(1,974.00)	(864.00)	(300.00)	(137.25)	(11.50)	(23,715.00)
16. Aggregate of Lines 6+15	19.50	18,192.00	22,325.25	27,336.00	17,101.00	10,490.00	4,404.00	2,602.75	167.50	102,638.00
17. Ratio to Band D	0.5556	0.6667	0.7778	0.8889	1.0000	1.2222	1.4444	1.6667	2.0000	
18. Relevant Amount (Line 16 x Line 17)	10.80	12,128.00	17,364.10	24,298.70	17,101.00	12,821.10	6,361.30	4,337.90	335.00	

May contain minor rounding adjustments

* This reflects the part year effect of 1,339 dwellings to be added during 2024/25

Aggregate of Relevant Amounts	94,757.90
Collection Rate	98.75%
Adjustment (contributions in lieu)	1.00
ESTIMATED TAXBASE 2024/25	93,574.40

Tax base calculation for enclosure committees and the parish of Rottingdean

	Royal Crescent	Hanover Crescent	Marine Square	Rottingdean Parish
Number of dwellings on list	25	45	117	1678
Number of chargeable dwellings	25	45	111	1708
Total number of appropriate percentage	(2.5)	(4.5)	(23.0)	(212.8)
Aggregate of chargeable dwellings and discounts	22.50	40.5	88.0	1495.3
Aggregate of Relevant Amounts (Band D equivalent)	30.0	43.1	70.2	1723.4
Collection Rate	99.00%	99.00%	99.00%	99.00%
TAXBASE	29.7	42.7	69.5	1706.2

Brighton & Hove City Council

Strategy, Finance & City Regeneration Committee

Agenda Item 92

Subject: Council Tax Premiums on Second homes and Long-term Empty Properties

Date of meeting: Strategy, Finance & Regeneration Committee: 25th January 2024
Full Council: 1st February 2024

Report of: Chief Finance Officer

Contact Officer: Name: Graham Bourne
Email: Graham.Bourne@brighton-hove.gov.uk

Ward(s) affected: All

For general release

1. Purpose of the report and policy context

- 1.1 The Levelling-up & Regeneration Bill achieved Royal assent on 26th October 2023.
- 1.2 The Levelling-up & Regeneration Act ('the Act') is wide ranging, including devolution provisions across England, and enhancements to Local Authorities' abilities to move forward regeneration schemes.
- 1.3 The Act also allows councils to:
 - i) Levy a Council Tax premium on second homes of up to 100% subject to formal full Council approval one year in advance of introducing the levy, and;
 - ii) Levy a Council Tax premium on empty properties at an earlier point (reducing from two years to one year) from 1 April 2024.
- 1.4 Under Section 11C (3) of the Act, any decision to impose a new class of premium must be taken at least 12 months before the financial year in which it would apply. Billing Authorities intending to adopt a premium on second homes are therefore required to make that decision before 31 March 2024, in order for the premium to come into effect on 1 April 2025.
- 1.5 Approval, in principle, was obtained at full Council on 23 February 2023¹ to consideration of introducing a 100% premium on second homes, subject to an officer report being provided to Policy & Resources Committee (now SFCR committee) as soon as practicably possible following Royal Assent of the relevant legislation. This reports meets this requirement and seeks

¹ Council Meeting 23 February 2023, Item 122, General Fund Revenue Budget, Capital & Treasury Management Strategy 2023/24, Recommendation 173^{viii}. ([Subject: \(brighton-hove.gov.uk\)](http://www.brighton-hove.gov.uk))

formal committee approval of the intended policy to apply increased council tax premiums on second homes.

- 1.6 In summary, for this council to introduce a second homes premium, a new class of premium, full Council must formally approve this proposal before 31 March 2024 for it to be in place from 1 April 2025.
- 1.7 It is therefore proposed that SFCR Committee recommend to full Council that it approves the proposal to levy the second homes premium at the maximum level permitted from the earliest point in time namely 1 April 2025.
- 1.8 This committee is asked at the same time to approve the application of the empty properties levy once a property has been empty for one year (as opposed to two years) from 1 April 2024 onward, in line with powers made available under the new Act.

2. Recommendations

Strategy, Finance & City Regeneration Committee:

- 2.1 That the Strategy, Finance & City Regeneration Committee approves the proposal to apply the current 100% premium applicable to long-term empty and unfurnished properties after one year instead of two years from 1 April 2024 as permitted by the Levelling Up & Regeneration Act 2023.
- 2.2 That the Strategy, Finance & City Regeneration Committee recommends to full Council that it formally approves the recommendation that a new 100% Council Tax premium be applied to empty furnished properties (second homes) from 1 April 2025.

Full Council:

- 2.3 That full Council adopts the recommendation of Strategy, Finance & City Regeneration Committee at para 2.2 above and formally approves the recommendation that a new 100% Council Tax premium be applied to empty furnished properties (second homes) from 1 April 2025.

3. Context and background information

Premiums on second Homes and Long-Term Empty Properties

- 3.1 Note that Long-Term Empty properties are unoccupied, unfurnished properties. Second Homes are generally furnished second homes (e.g. an example may be someone who works and lives in geographically different places and has a home in each).
- 3.2 In May 2022 Government published the Levelling Up and Regeneration Bill, which includes proposals to further discourage the holding of empty properties via the application of council tax premiums, as well as measures that recognise the impact that high levels of second homes can have in some areas.

- 3.3 Historically, up until 2015 second homes effectively benefited from a reduced council tax charge. However, at that point the Council resolved to remove the discretionary discount and a full charge was applied. The enactment of the Levelling Up and Regeneration bill has provided billing authorities with the powers to apply a premium to second homes for the first time.
- 3.4 Additionally, the Levelling Up and Regeneration Act allows the City Council to reduce the minimum period for the implementation of a council tax premium for long-term empty unfurnished properties from two years to one year. In effect, after one year of a property being classified as empty, the council tax charge can increase from 100% to 200%.
- 3.5 There are exemptions to the premiums being applied that account for exceptional circumstances, for example, annexes forming part of, or being treated as part of, a main dwelling.

4. Analysis and consideration of alternative options

- 4.1 Applying a premium to second homes and empty properties allows councils to raise additional revenue and to acknowledge the impact that second and empty homes can have on communities and housing supply. In the case of empty properties, this may incentivise property owners to bring properties back into use.
- 4.2 Initial analysis indicates that the application of a 100% premium on second homes could increase the level of collectable council tax by approximately £2.9 million from 2025/26 onward based on the current number of second homes and assuming there is no behavioural change. The table below shows the full council tax including precepts from Police and Fire authorities:

Council Tax Band	Number of second homes	Current 100% charge £m	Second home premium applied
A	273	0.405	0.810
B	293	0.508	1.016
C	273	0.541	1.082
D	247	0.550	1.100
E	184	0.501	1.002
F	57	0.183	0.366
G	50	0.186	0.372
H	8	0.036	0.072
Total	1,385	2.910	5.820

- 4.3 Where previously there has been no incentive for property owners to differentiate between second homes and primary homes, the introduction of the additional premium will lead to the provision of more accurate information and, inevitably, an increase in avoidance behaviours. This is anticipated to result in some reduction of the numbers of properties categorised as second homes.

- 4.4 Similarly, there may be positive and negative behaviours as a result of the changes to the long-term empty property premium. Positive in terms of accelerating actions to bring homes back into use and negative in terms of increasing avoidance behaviour. Based on current data, the application of the long-term empty premium after one year instead of two, could increase Council Tax revenues by circa £0.913m from 2024/25 onward. The council's share equates to £0.766m. Taking account a prudent estimate for behavioural changes, a net increase in council tax of £0.500m will be incorporated into the council tax base for 2024/25.

Council Tax Band	Potential number of empty properties that will become subject to premium on 01/04/24	Current 100% Charge £ m	With premium applied £ m
A	107	0.159	0.318
B	112	0.194	0.388
C	121	0.240	0.480
D	52	0.116	0.232
E	47	0.128	0.256
F	12	0.039	0.078
G	10	0.037	0.074
H	0	0	0
Total	461	0.913	1.826

5. Community engagement and consultation

- 5.1 The Government consulted with local authorities on circumstances where properties could be exempted from the empty homes or second home premiums between the 6th July and 31st August 2023, before finalising the Act referred to here.
- 5.2 The Act does not require councils to consult formally with residents, homeowners or council Taxpayers before using the powers which form the basis of the proposals made here.

6. Conclusion

- 6.1 The Act offers councils the option, as Council tax billing authorities, to charge a premium on second homes and to reduce the time period before applying a premium to long-term empty properties. It is recommended that both of the proposals are applied to the maximum extent possible, as soon as possible, to further incentivise owners to bring properties back into use and to provide much needed revenue to secure the provision of essential local services to residents.

7. Financial implications

- 7.1 The implementation of the empty property premium after 1 year is estimated to generate £0.500m additional revenue for this council, after a prudential

adjustment for behavioural changes, and this is included in the taxbase report elsewhere on this agenda and will support the 2024/25 budget.

- 7.2 The Council Tax premium for second homes is estimated to generate £2.910m from 2025/26 of which this council's share would be £2.443m. However, this does not take into account any behavioral changes which will become apparent during 2024/25 as this change becomes more widely known. As a working assumption an estimated increase in council tax income of £1.600m will be included in the Medium-term Financial Plan for 2025/26 and will be subject to review when setting the tax base in January 2025.

Finance officer consulted: James Hengeveld Date consulted:04/01/2024.

8. Legal implications

The Levelling Up & Regeneration Act 2023 amends the Local Government Finance Act 1992 in the terms described in this Report, namely by allowing billing authorities the discretion for the purposes of levying Council Tax to a) treat as long-term empty dwellings properties which are empty for a minimum period of one year (as opposed to two) and/or b) to apply a new levy of up to 100% additional Council Tax in relation to dwellings occupied only periodically. If they choose to exercise either discretionary power, then billing authorities are required to have regard to any guidance issued by the Secretary of State. Regulations may furthermore be made limiting the application of this provision relating to periodically occupied properties, or 'second homes'.

- 9.1 The Act specifies the process be followed where billing authorities decide to make a determination in relation to b) (the new levy). This process requires a decision to be made by full Council by the end of this current financial year where there is an intention to levy the increased charge from 1st April 2025. It further includes the requirement that notice be published in one or more newspaper.

Lawyer consulted: Victoria Simpson Date consulted: 4.1.24

9. Equalities implications

- 9.2 No significant local data is held in relation to the characteristics of second home owners, however, national data provided by government in respect of 'An English Housing Survey 2021 to 2022: second homes - fact sheet' is included at Appendix 1 and an Equality Impact Assessment is provided at Appendix 2.

10. Sustainability implications

- 10.1 None Identified in this report.

Social Value and procurement implications

- 11.1 The premiums are designed to incentivise owners to bring properties back into use earlier than might otherwise be the case. This could improve the supply of housing in the city, bringing a range of social value benefits associated with any measure that may relieve pressure on housing demand, which remains very high in the city.

Supporting Documentation

1. English Housing Survey 2021 to 2022: second homes- fact sheet undertaken by the Government. [English Housing Survey 2021 to 2022: second homes - fact sheet - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/107112/English_Housing_Survey_2021_to_2022_second_homes_fact_sheet.pdf)
2. Equality Impact Assessment (EIA)

Equality Impact Assessment – Council Tax Premia on Empty Properties

1. Assessment details

Name of activity or proposal being assessed:	Assessment of Council Tax Second Home and Empty Property premiums
Directorate:	Governance, People & Resources (GPR)
Service:	Welfare, Revenues and Business Support
Team:	Revenues (Council Tax)
Is this a new or existing activity?	<p>This is both a change and a new activity –</p> <p>A change in existing activity for empty properties – currently a premium is applied 2 years after a property becomes empty, this is changing to 1 year with effect from 1st April 2024.</p> <p>New- Second homes do not currently attract a premium, if approved at committee and full council before 31st March 2024 a 100% premium will be added to their Council Tax account after 12 months, so with effect from 1st April 2025.</p>
Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)	Yes, there was a related EIA produced in 2012.

2. Contributors to the assessment (Name and Job title)

Responsible Lead Officer:	Annie Brown
Accountable Manager:	Graham Bourne
Additional stakeholders collaborating or contributing to this assessment:	

3. About the activity

Briefly describe the purpose of the activity being assessed:

Implementation of new National & Billing authority legislation to introduce Council Tax Premiums on second homes and properties that remain unoccupied and unfurnished for periods exceeding 1 year, as detailed in the Government's levelling Up and Regeneration Bill (the bill).

What are the desired outcomes of the activity?

The proposals will generate additional Council Tax revenue, facilitating the delivery of essential front-line services within Brighton and Hove. The key rationale for the recommendation is to:

- . Incentivise the occupation of empty properties.
- . Discourage, or generate additional income from, second home ownership in order to ensure the supply of homes to meet local housing needs.

Which key groups of people do you think are likely to be affected by the activity?

Service users and the wider community

4. Consultation and engagement

What consultations or engagement activities have already happened that you can use to inform this assessment?

- For example, relevant stakeholders, groups, people from within the council and externally consulted and engaged on this assessment. **If no consultation** has been done or it is not enough or in process – state this and describe your plans to address any gaps.

5.1	The Act does not require formal consultation with residents or Taxpayers. The Government consulted with local authorities on circumstances where properties could be exempted from the empty homes or second home premiums between the 6 th July and 31 st August 2023.
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5. Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this activity? Consider all possible intersections.

The Council Tax does not collect any of this demographic data

Age	For council tax purposes we ask for the names of all residents over 18 in each property.
Disability and inclusive adjustments, coverage under equality act and not	NO
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	NO
Religion, Belief, Spirituality, Faith, or Atheism	NO
Gender Identity and Sex (including non-binary and Intersex people)	NO
Gender Reassignment	NO
Sexual Orientation	NO
Marriage and Civil Partnership	NO
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	NO
Armed Forces Personnel, their families, and Veterans	NO
Expatriates, Migrants, Asylum Seekers, and Refugees	NO
Carers	NO
Looked after children, Care Leavers, Care and fostering experienced people	NO
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	NO

Socio-economic Disadvantage	NO
Homelessness and associated risk and vulnerability	NO
Human Rights	NO
Another relevant group (please specify here and add additional rows as needed)	NO

Additional relevant groups that may be widely disadvantaged and have intersecting experiences that create exclusion and systemic barriers may include:

- Ex-offenders and people with unrelated convictions
- Lone parents
- People experiencing homelessness
- People facing literacy and numeracy barriers
- People on a low income and people living in the most deprived areas
- People who have experienced female genital mutilation (FGM)
- People who have experienced human trafficking or modern slavery
- People with experience of or living with addiction and/ or a substance use disorder (SUD)
- Sex workers

If you answered “NO” to any of the above, how will you gather this data to enable improved monitoring of impact for this activity?

No local data is held by the Council Tax team on the protected characteristics of owners of Second homes, or who own empty properties. General data held for England has been reviewed. [English Housing Survey 2021 to 2022: second homes - fact sheet - GOV.UK \(www.gov.uk\)](#)
This shows that couples without children make up the highest percentage of those with second homes. No impact on protected groups have been identified from the data we hold.

What are the arrangements you and your service have for monitoring, and reviewing the impact of this activity?

Monitoring through Customer contact and regular reviewing. Date to be set (following full council decision)

6. Impacts

5.1 Age

Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: those under 16, young adults, with other intersections.	We do not hold this data
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

5.2 Disability:

Does your analysis indicate a disproportionate impact relating to [Disability](#), considering our [anticipatory duty](#)?

We do not hold this data

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

What [inclusive adjustments](#) are you making for diverse disabled people impacted? For example: D/deaf, deafened, hard of hearing, blind, neurodivergent people, those with non-visible disabilities, and with access requirements that may not identify as disabled or meet the legal definition of disability, and have various intersections (Black and disabled, LGBTQIA+ and disabled).

5.3 Ethnicity, ‘Race’, ethnic heritage (including Gypsy, Roma, Travellers):

Does your analysis indicate a disproportionate impact relating to ethnicity?

We do not hold this data

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

5.4 Religion, Belief, Spirituality, Faith, or Atheism:

Does your analysis indicate a disproportionate impact relating to Religion, Belief, Spirituality, Faith, or Atheism?

We do not hold this data

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

5.5 Gender Identity and Sex:

Does your analysis indicate a disproportionate impact relating to [Gender Identity](#) and [Sex](#) (including non-binary and intersex people)?

We do not hold this data

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

5.6 Gender Reassignment:

Does your analysis indicate a disproportionate impact relating to Gender Reassignment?	We do not hold this data
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

5.7 Sexual Orientation:

Does your analysis indicate a disproportionate impact relating to Sexual Orientation?	We do not hold this data
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

5.8 Marriage and Civil Partnership:

Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?	We do not hold this data
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

5.9 Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum):

Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)?	We do not hold this data
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

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5.10 Armed Forces Personnel, their families, and Veterans:

Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?	We do not hold this data
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

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5.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

Does your analysis indicate a disproportionate impact relating to Expatriates, Migrants, Asylum seekers, Refugees, those New to the UK, and UK visa or assigned legal status? (Especially considering for age, ethnicity, language, and various intersections)	We do not hold this data
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

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5.12 [Carers](#):

Does your analysis indicate a disproportionate impact relating to Carers (Especially considering for age, ethnicity, language, and various intersections).	We do not hold this data
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

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5.13 Looked after children, Care Leavers, Care and fostering experienced people:

Does your analysis indicate a disproportionate impact relating to Looked after children, Care Leavers, Care and fostering experienced children and adults (Especially considering for age, ethnicity, language, and various intersections).	We do not hold this data
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Also consider our Corporate Parenting Responsibility in connection to your activity.	
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

5.14 Homelessness:

Does your analysis indicate a disproportionate impact relating to people experiencing homelessness, and associated risk and vulnerability? (Especially considering for age, veteran, ethnicity, language, and various intersections)	Yes - Positive
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Potential Positive impact - The premiums are designed to incentivize owners to bring properties back into use earlier than might otherwise be the case. This could improve the supply of housing in the city, bringing a range of social value benefits associated with any measure that may relieve pressure on housing demand, which remains very high in the city.

5.15 Domestic and/or Sexual Abuse and Violence Survivors, people in vulnerable situations:

Does your analysis indicate a disproportionate impact relating to Domestic Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)?	We do not hold this data
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

5.16 Socio-economic Disadvantage:

Does your analysis indicate a disproportionate impact relating to Socio-economic Disadvantage? (Especially considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections)	Yes - Positive
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Potential positive impact - Increasing housing supply locally, and bringing empty properties back into the currently short supply of local private rental sector, has the potential to benefit a broad spectrum of groups who have protected characteristics, or who have been particularly impacted by the shortage of affordable homes in the city, including but not limited to:

- Those of working age and on relatively low incomes who are adversely impacted by the ‘rent gap’.
- Those with specific mobility issues who may struggle to find accommodation, which is both affordable, and suitable, according to their needs.
- Those who require alternative accommodation because they have been subject to domestic violence, abuse or harassment.
- Local residents who have refugee status

5.17 Human Rights:

Will your activity have a disproportionate impact relating to Human Rights?	We do not hold this data
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

5.17 Cumulative, multiple intersectional, and complex impacts (including on additional relevant groups):

What cumulative or complex impacts might the activity have on people who are members of multiple Minoritised groups?

- For example: people belonging to the Gypsy, Roma, and/or Traveller community who are also disabled, LGBTQIA+, older disabled trans and non-binary people, older Black and Racially Minoritised disabled people of faith, young autistic people.
- Also consider wider disadvantaged and intersecting experiences that create exclusion and systemic barriers:
 - People experiencing homelessness
 - People on a low income and people living in the most deprived areas
 - People facing literacy and numeracy barriers
 - Lone parents
 - People with experience of or living with addiction and/ or a substance use disorder (SUD)
 - Sex workers
 - Ex-offenders and people with unrelated convictions
 - People who have experienced female genital mutilation (FGM)
 - People who have experienced human trafficking or modern slavery

Potential positive impact on homelessness in Brighton & Hove, by bringing properties back into use.

7. Action planning

Which action plans have the actions identified in the previous section been transferred to?

The following actions through improved monitoring –

Fair and inclusive Action Plan - will be able to monitor if there is a decrease in second Homes and or empty properties in Brighton or Hove, which will result in more available housing.

Through customer feedback/complaints.

Identify with empty property team how to monitor vulnerability issues in customers with Long-term Empty Properties.

Consider how we help in individual circumstances where protected characteristics are factors.

What SMART actions will be taken to address the disproportionate and cumulative impacts you have identified?

1. SMART Action 1 & 2

- Regularly monitor the number of Second Homes and empty properties in the Brighton & Hove City area.
- Monitor customer feedback and complaints regarding the application of premiums.

2. SMART Action 3 &4

- Liaise with the empty property team and monitor vulnerability issues in customers with Long-term empty properties.
- Consider how we help in individual circumstances where protected characteristics are factors.

8. Outcome of your assessment

What decision have you reached upon completing this Equality Impact Assessment? (Mark 'X' for any ONE option below)

Stop or pause the activity due to unmitigable disproportionate impacts because the evidence shows bias towards one or more groups.	
Adapt or change the activity to eliminate or mitigate disproportionate impacts and/or bias.	
Proceed with the activity as currently planned – no disproportionate impacts have been identified, or impacts will be mitigated by specified SMART actions.	X
Proceed with caution – disproportionate impacts have been identified but having considered all available options there are no other or proportionate ways to achieve the aim of the activity (for example, in extreme cases or where positive action is taken). Therefore, you are going to proceed with caution with this policy or practice knowing that it may favour some people less than others, providing justification for this decision.	

If your decision is to “Proceed with caution”, please provide a reasoning for this:

Summarise your overall equality impact assessment recommendations to include in any committee papers to help guide and support decision-making:

There may be positive and negative behaviours as a result of the changes to the empty property premia. Positive in terms of accelerating actions to bring homes back into use and negative in terms of avoidance behaviours.

There is a realisation that some properties affected are not deliberately kept empty, but that the owners cannot sell or let them for various reasons which are often beyond their control.

Introducing the additional charges could lead to an increase in financial burden in some cases.

Cases where there is an exceptional financial burden will be reviewed on an individual basis, through an established internal panel assessment.

Grand total of all domestic properties in the Valuation list for Brighton & Hove as at 7 January 2024 is 134,925.

Potential amount of empty properties attracting the premium on 1 April 2024 (that would have been empty for at least a year, based on current data) is 461.

9. Publication

All Equality Impact Assessments will be published. If you are recommending, and choosing not to publish your EIA, please provide a reason:

N/A

10. Directorate and Service Approval

Signatory:	Name and Job Title:	Date: DD-MMM-YY
Responsible Lead Officer:	Annie Brown	08-01-2024
Accountable Manager:	Graham Bourne	08-01-2024