

# Cabinet

Date: **25 September 2025**

Time: **2.00pm**

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

Members: **Councillors:** Sankey (Chair), Taylor (Deputy Chair), Alexander, Allen, Daniel, Miller, Muten, Robins, Rowkins and Williams

Contact: **John Peel**  
Acting Democratic Services Manager  
01273 291058  
[john.peel@brighton-hove.gov.uk](mailto:john.peel@brighton-hove.gov.uk)

Agendas and minutes are published on the council's website [www.brighton-hove.gov.uk](http://www.brighton-hove.gov.uk).  
Agendas are available to view five working days prior to the meeting date.

Electronic agendas can also be accessed through our meetings app available through ModernGov: [iOS/Windows/Android](#)

This agenda and all accompanying reports are printed on recycled paper



Chief Executive  
Hove Town Hall  
Norton Road  
Hove BN3 3BQ

Date of Publication - Wednesday, 17 September 2025

# AGENDA

## Part One

## Page

### 29 PROCEDURAL BUSINESS

- (a) **Declarations of Interest:** Statements by all Members present of any personal interests in matters on the agenda, outlining the nature of any interest and whether the Members regard the interest as prejudicial under the terms of the Code of Conduct.
- (b) **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 online in the Constitution at Part 3E*

### 30 MINUTES

To Follow

To consider the minutes of the meeting held on 17<sup>th</sup> July 2025.

### 31 CHAIR'S COMMUNICATIONS

### 32 CALL OVER

### 33 PUBLIC INVOLVEMENT

7 - 8

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 19<sup>th</sup> September 2025.
- (c) **Deputations:**  
To receive any deputations submitted by the due date of 10am on the 19<sup>th</sup> September 2025.

## **34 ISSUES RAISED BY MEMBERS**

To consider the following matters raised by Members:

### **(a) Written Questions:**

To consider any written questions

## **35 MATTERS REFERRED TO THE EXECUTIVE**

## **36 REPRESENTATIONS FROM OPPOSITION MEMBERS**

## **37 LOCAL GOVERNMENT REORGANISATION**

**9 - 108**

*Contact Officer: Elizabeth Culbert*  
*Ward Affected: All Wards*

## **38 THE KING ALFRED LEISURE CENTRE REGENERATION PROJECT**

**109 - 188**

*Contact Officer: Mark Healy*  
*Ward Affected: All Wards*

## **39 ADMISSION OF NEW MEMBER TO THE GREATER BRIGHTON ECONOMIC BOARD**

**189 - 202**

*Contact Officer: Andy Hill*  
*Ward Affected: All Wards*

## **40 BRILLIANT BRIGHTON BUSINESS IMPROVEMENT DISTRICT (BID) - NEW BALLOT**

**203 - 212**

*Contact Officer: Peter Sharp*  
*Ward Affected: Regency; West Hill & North Laine*

## **41 CORPORATE HEALTH, SAFETY AND WELLBEING POLICY**

**213 - 250**

*Contact Officer: Brent Schwarz*  
*Ward Affected: All Wards*

## **42 ROUGH SLEEPING & SINGLE HOMELESS SERVICES COMMISSIONING**

**251 - 260**

*Contact Officer: Aaron Burns*  
*Ward Affected: All Wards*

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.

Infra-red hearing aids are available for use during the meeting. If you require any further information or assistance, please contact the receptionist on arrival.

### **Further information**

For further details and general enquiries about this meeting contact John Peel, (01273 291058, email [john.peel@brighton-hove.gov.uk](mailto:john.peel@brighton-hove.gov.uk)) or email [democratic.services@brighton-hove.gov.uk](mailto:democratic.services@brighton-hove.gov.uk)

### **Webcasting notice**

This meeting may be filmed for live or subsequent broadcast via the Council's website. At the start of the meeting the Chair will confirm if all or part of the meeting is being filmed. You should be aware that the Council is a Data Controller under the Data Protection Act 1998. Data collected during this web cast will be retained in accordance with the Council's published policy.

Therefore, by entering the meeting room and using the seats in the chamber you are deemed to be consenting to being filmed and to the possible use of those images and sound recordings for the purpose of web casting and/or Member training. If members of the public do not wish to have their image captured, they should sit in the public gallery area.

### **Access notice**

The Public Gallery is situated on the first floor of the Town Hall and is limited in size but does have 2 spaces designated for wheelchair users. The lift cannot be used in an emergency. Evac Chairs are available for self-transfer and you are requested to inform Reception prior to going up to the Public Gallery. For your own safety please do not go beyond the Ground Floor if you are unable to use the stairs.

Please inform staff on Reception if this affects you so that you can be directed to the Council Chamber where you can watch the meeting or if you need to take part in the proceedings e.g. because you have submitted a public question.

### **Fire & emergency evacuation procedure**

If the fire alarm sounds continuously, or if you are instructed to do so, you must leave the building by the nearest available exit. You will be directed to the nearest exit by council staff. It is vital that you follow their instructions:

- You should proceed calmly; do not run and do not use the lifts;
- 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

## Cabinet

## Agenda Item 33(a)

**Subject:** Petitions

**Date of meeting:** 25 September 2025

**Report of:** Director- Governance & Law

**Contact Officer:** Name: John Peel  
Tel: 01273 291058  
Email: [john.peel@brighton-hove.gov.uk](mailto:john.peel@brighton-hove.gov.uk)

**Ward(s) affected:** All

### **1. Purpose of the report and policy context**

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

### **2. Recommendations**

- 2.1 That Cabinet note the petition.

### **3. Context and background information**

- 3.1 To receive the following petition signed by 409 people at the time of publication:

#### **(1) Extend public toilet opening times**

We the undersigned petition Brighton & Hove Council to extend the opening hours of public toilets along the beach and seafront. The current opening times, with many seafront toilets not accessible before 10am and closing by 6pm, are wholly inadequate for a city with a vibrant early morning and late evening beach culture. Proposal for Modernisation: We urge the council to implement remote-controlled locking or shutter systems for public toilets, enabling automatic opening from 6am during the summer, dawn the rest of the year, and the focus of staffing to shift to evening checks and closing up, 9-10pm during summer, dusk the rest of the year. Such systems are widely used, reliable, and can be managed remotely or via programmable timers, eliminating the need for staff to physically unlock each facility. If, during evening checks, an attendant finds a facility in an unusable state, the automatic unlock can be disabled for the next day and the toilet remain closed until the issue is resolved.

- 3.2 To receive the following petition signed by 864 people at the time of publication:

#### **(2) Objection to Withdean Indoor Tennis Court Conversion**

We urge the Brighton & Hove City Council to immediately pause these plans and initiate a full and transparent public consultation process. Our

community deserves to have its voice heard on the future of Withdean Sports Complex and its cherished indoor tennis courts.

# Brighton & Hove City Council

## Cabinet

## Agenda Item 37

**Subject:** Local Government Reorganisation

**Date of meeting:** 25 September 2025

(Special Full Council: 24 September 2025)  
(Place Overview & Scrutiny: 22 September 2025)

**Report of:** Leader of the Council

**Lead Officer:** Name: Chief Executive

**Contact Officer:** Name: Elizabeth Culbert

Email: [Elizabeth.Culbert@brighton-hove.gov.uk](mailto:Elizabeth.Culbert@brighton-hove.gov.uk)

**Ward(s) affected:** All Wards

**Key Decision:** Yes

**Reason(s) Key:** Is significant in terms of its effects on communities living or working in an area comprising two or more electoral divisions (wards).

### For general release

#### 1. Purpose of the Report

- 1.1 This report presents Brighton & Hove City Council's Local Government Reorganisation proposal for Sussex and seeks Member approval for submission to the Ministry of Housing, Communities and Local Government by 26 September 2025, in line with the nationally set timetable.
- 1.2 The report builds on earlier consideration of Local Government Reorganisation by the Council, including: Cabinet on 20 March 2025; and Overview and Scrutiny on 5 June 2025 Special Place Overview and Scrutiny on 31 July 2025
- 1.3 This report is being considered by Overview & Scrutiny on 22 September 2025 to allow Members to test the evidence, challenge assumptions and make recommendations. A Special Council will also consider this report on 24 September 2025.
- 1.4 The submission comprises two parts. The first is a statutory Base Proposal framed on whole principal authority boundaries in accordance with the Local Government and Public Involvement in Health Act 2007. The second is a request for ministerial modification to consult on a refined five-unitary model across Sussex, with each council serving approximately 300,000 to 400,000 residents. This approach ensures statutory compliance while also presenting what in the Council's judgement best meets the Government's six published criteria for local government reorganisation.

## **2. Recommendations**

That Cabinet

- 2.1 Agrees the Final Proposal: 'Representative Councils for a Devolved Sussex: A Five Unitary Proposal' as set out at Appendix 1 and approves its submission to the Secretary of State for Housing, Communities and Local Government by 26 September 2025.
- 2.2 Delegates authority to the Chief Executive, in consultation with the Leader of the Council, to make any final adjustments to the Final Proposal before the deadline for submission.

## **3. Context and Background Information**

- 3.1 In February 2025 the Secretary of State for Housing, Communities and Local Government invited principal authorities in East Sussex including Brighton and Hove and in West Sussex to bring forward proposals for Local Government Reorganisation. The invitation requires proposals to be submitted by 26 September 2025.
- 3.2 The invitation confirmed that proposals should be framed from whole district and borough boundaries wherever possible. It also stated that authorities may request refined boundaries where there is strong justification in terms of geography, services or identity.
- 3.3 The purpose of the invitation is to create a clear map of single-tier councils to replace the current county and district arrangements. Government has linked this to its wider policy on devolution and Mayoral Combined Authorities but the two processes are legally distinct. Local Government Reorganisation is about the structure of local councils. Devolution is about the transfer of additional powers to a directly elected Mayor and Combined Authority. A coherent unitary map may support devolution but the decisions are separate.
- 3.4 The Council submitted an interim response in March 2025 describing the unique character of Brighton and Hove, early engagement feedback and the options to be explored. East Sussex and West Sussex also submitted interim responses.
- 3.5 In June 2025 Government published feedback on the interim responses. This did not approve or reject options. It asked all areas to:
  - use common datasets and assumptions
  - present evidence clearly against the six criteria
  - format proposals so that residents and partners can compare options on a like-for-like basis
  - confirm that base proposals used whole districts as building blocks, with any refined boundaries presented as requests for ministerial modification
  - where proposals spanned both invitation areas, set out the implications for East and West Sussex together

- 3.6 The Final Proposal is entitled 'Representative Councils for a Devolved Sussex: A Five Unitary Proposal' and is set out at Appendix 1. The Proposal has two parts:
1. A statutory Base Proposal, framed on whole district boundaries as the initial basis in accordance with the 2007 Act. This fulfils the Council's legal duty to provide a compliant proposal.
  2. A request for ministerial modification, asking Government to consult on a refined five-unitary model for Sussex.
- 3.7 The Base Proposal ensures statutory compliance. The requested modification presents the option that in the Council's judgement better meets the Government's tests.
- 3.8 Government has set six criteria which it will use to assess all proposals. They are:
- A proposal should seek to achieve for the whole of the area concerned the establishment of a single tier of local government.
  - Unitary local government must be the right size to achieve efficiencies, improve capacity and withstand financial shocks.
  - Unitary structures must prioritise the delivery of high quality and sustainable public services to citizens.
  - Proposals should show how councils in the area have sought to work together in coming to a view that meets local needs and is informed by local views.
  - New unitary structures must support devolution arrangements.
  - New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment.
- 3.9 It is for Government to decide which proposals meet these criteria. Only those judged viable will be taken forward to statutory consultation later this year. If Ministers decide to proceed, change would be implemented through a Structural Changes Order. This would provide for vesting, transfer schemes for property, rights and liabilities, staffing and pensions, and interim electoral arrangements pending a full review by the Local Government Boundary Commission for England. Day-one continuity of services would be the guiding principle.

#### **4. Analysis and Consideration of Alternative Options**

- 4.1 This section sets out the options that have been considered, the statutory requirement to provide a Base Proposal, and the reasons why Cabinet is asked to agree a request for ministerial modification to a refined five-unitary model. It provides Cabinet with a transparent record of the appraisal process.
- 4.2 Under the Local Government and Public Involvement in Health Act 2007 the Council must submit a proposal framed on whole principal authority boundaries. This Base Proposal is a legal requirement. Without it the submission would be invalid. The Base Proposal is set out in Section 4,

Appendix 1 and creates five unitary councils based on existing district and borough boundaries. While compliant, it produces units of uneven size and does not always reflect how residents use services across boundaries.

- 4.3 The Council assessed alternatives using a Sussex-wide evidence base drawn from published datasets. The same assumptions were applied to all options. Options were reviewed against the six Government criteria and with reference to functional geographies, service footprints and population scale. Non-statutory engagement findings within Brighton and Hove's remit informed which alternatives were taken forward.
- 4.4 In developing the submission, three main structural configurations were assessed. Each has advantages and disadvantages when considered against the Government's criteria.
- 4.5 Three unitary councils: This option would be simpler to deliver in the short term and would reduce the number of organisations, creating opportunities for economies of scale. It would however create very large variations in population size. One or two councils would be very large and potentially remote from residents, while others would be relatively small and financially fragile. Councils of this scale would need compensatory governance arrangements to maintain a local connection, which runs against the intention to strengthen neighbourhood and resident led working. Overall, the pattern of resilience and collaboration across Sussex would be uneven.
- 4.6 Four unitary councils: A four council model would be easier to deliver than five and would allow stronger pooling of resources at the outset. It would still produce councils of uneven size, leaving larger units at risk of feeling distant and less recognisable to residents. Over time the structure would remain less balanced and the sense of local identity and accountability would be weaker than under other options.
- 4.7 Five unitary councils: A five council map, modified in accordance with the Final Proposal, would place all authorities within a broad population band of approximately 300,000 to 400,000 residents. This avoids extremes of size, reduces the risk of fragility or remoteness, and provides a fairer basis for collaboration. It aligns more closely to functional geographies, including the coastal corridor and the north to south travel routes, and preserves parishes and principal towns as intact building blocks. It would be more complex and costly to deliver in the short term and would require careful planning to separate and re combine services and systems.
- 4.8 All options have strengths and weaknesses. Three and four unitary councils offer relative ease of delivery at the start, yet leaves long term imbalances in size and accountability. The statutory Base Proposal satisfies the legal requirement yet does not fully reflect how residents use services. In the Council's judgement, the modified five unitary model provides the most balanced and sustainable structure over time and is therefore put forward as the Final Proposal for Government to test through statutory consultation.



- 4.9 Requested modification to the Base Proposal: The Council asks Ministers to modify the statutory Base Proposal in order to consult on a refined five unitary model. The modification proposes ward transfers and one parish transfer where the evidence shows stronger ties in schools, health services, workplaces and transport. The effect is to place each new council within the approximate 300,000 to 400,000 resident band and to align the map more closely to daily use of services and to economic corridors.

Table 1: summary of analysis of different options against the Government criteria

<b>Government criteria</b>	<b>Three unitaries</b>	<b>Four unitaries</b>	<b>Five unitaries (modified proposal)</b>
<b>1. Single tier</b>	Achieved	Achieved	Achieved
<b>2. Right size &amp; resilience</b>	Very uneven size with one very large council and one relatively small council. Higher risk of remoteness at the top end and fragility at the bottom end.	Uneven size remains. Balance improves a little but larger councils still dominate.	All councils within about 300000 to 400000 residents. No council is very large or very small.
<b>3. High quality sustainable services</b>	Fewer organisations but more service hand offs because boundaries cut across how people use schools, care and transport.	Some early pooling of resources but service footprints still split.	Boundaries follow lived corridors. Fewer hand offs and a single discharge and reablement pathway per council footprint.
<b>4. Local views &amp; collaboration</b>	Public concern that councils would feel too big and distant. Collaboration risks if one council dominates.	Some concern about recognition and accountability. Joint working still uneven.	Scepticism remains but design conditions are built in. Five councils collaborate as peers of similar size.
<b>5. Supports devolution</b>	One very large partner at the Mayoral table. Imbalance likely.	Two large, two smaller; imbalance persists	Five balanced partners; none too big or small
<b>6. Community engagement &amp; neighbourhood empowerment</b>	Would need compensatory governance to	Larger councils risk diluting neighbourhood voice	Parishes preserved with neighbourhood

	keep decisions close to residents		standards to be considered
--	--------------------------------------	--	-------------------------------

## 5. Community Engagement and Consultation

- 5.1 Engagement was designed to inform residents and stakeholders within Brighton and Hove's current boundaries about Local Government Reorganisation, to gather views on principles and options for the Council's future footprint, and to surface the conditions people expect to see if change proceeds. The Council's remit is limited to engagement inside its own borders. It does not extend to consulting residents across Sussex. Only Government can undertake a statutory consultation that will allow residents and partners to compare all proposals on a like-for-like basis across the whole county.
- 5.2 Round 1 took place in April 2025. It sought open views on principles and priorities rather than testing specific options. More than six hundred people responded. Findings were used to shape the options brought forward for the formal consultation.
- 5.3 Round 2 ran from 25 July to 25 August 2025. It invited views on four eastward options for the Council's future footprint and asked what mattered most to people, including identity and continuity of services. In-person sessions were held along the eastern border including a public meeting in Saltdean. Online and paper routes ran in parallel. This round received 2,307 responses.
- 5.4 Participation was open and self-selecting and is therefore not statistically representative. Responses were analysed with support from Ignite Consulting using documented methods with disclosed limitations. The responses highlight themes and concerns but do not provide a statistically representative measure of overall opinion. They have therefore been used to inform the proposal as qualitative evidence rather than as a numerical mandate.
- 5.5 Of the 2,307 responses in Round 2, 31 per cent identified as Brighton and Hove residents, 58 per cent identified as non-residents, 6 per cent identified as staff, partners, businesses or voluntary and community groups, and 5 per cent identified as other or did not state. This pattern reflects interest from neighbouring areas but the Council's formal consultation activity was confined to its own boundaries.
- 5.6 Across both rounds respondents expressed scepticism about structural reform. This reflects national experience, where proposals for reorganisation are often viewed with caution. Within that, the following consistent concerns emerged.
1. Identity and representation: Many respondents feared losing the distinct identity of Brighton and Hove or of the towns and parishes to the east. They emphasised that councils need to remain recognisable in scale

and character. There was concern that larger authorities could feel remote, weakening the link between elected members and residents.

2. Trust and governance: Comments often referred to confidence in delivery. Some respondents expressed doubts about the Council's track record and wanted stronger assurances that a new authority would be well-governed, transparent and responsive. This mirrors national feedback in other reorganisations, where governance credibility is a central issue.
3. Services and infrastructure: Respondents highlighted the importance of continuity in frontline services such as waste, adult social care, special educational needs and school admissions. There was also anxiety about whether infrastructure such as roads, transport links and healthcare facilities could cope with further demand. A key theme was that reorganisation must not disrupt essential services.
4. Boundaries and alternatives: There was uncertainty and sometimes suspicion about why certain areas were included or excluded in the options. Some respondents questioned whether boundaries were being drawn for political convenience rather than functional logic. Others suggested alternatives, including westward integration or keeping existing arrangements. This demonstrates the importance of explaining the rationale for boundaries in terms of daily life, travel and service use.
5. Finance and council tax: Concerns were raised about how the costs of reorganisation would be met, how council tax levels would be harmonised, and whether debt would be fairly shared. Residents wanted transparency about financial impacts and guarantees that frontline services would not be reduced to fund change.
6. Safeguards for vulnerable groups: Respondents often asked what reorganisation would mean for children with special educational needs, families at risk of homelessness, and adults receiving care. There was a strong desire to ensure that the most vulnerable would not experience disruption or reduced access during transition.
7. Process and transparency: Finally, many respondents felt the process was rushed and wanted clearer information about what decisions could and could not be made locally. Some were unsure whether they would have the option to stay with their existing council. This aligns with experiences in other parts of the country where clarity about statutory process is crucial.

5.7 These concerns echo the themes raised in other areas of England undergoing reorganisation, where residents are cautious about change but focus on conditions such as identity, continuity, clear accountability, and protection of vulnerable groups.

5.8 This feedback has been used to inform the submission. In the Final Proposal at Appendix 1, Councils are kept within an indicative population band of 300,000 to 400,000 so they remain recognisable and do not feel remote. Parish and neighbourhood voice is protected through the retention of town and parish councils and the intention is set out to consider neighbourhood standards in each new authority. Day-one continuity is the guiding principle, with safeguarding and care pathways maintained under the Structural Changes Order. Financial candour is reflected in a single neutral method,

published assumptions and explicit guardrails on reserves, and a clear approach to council tax harmonisation to be set through the Order. Where respondents asked for clearer rationales for inclusions and exclusions, the requested modification uses evidence on daily travel, service use and anchors such as schools, hospitals and transport corridors.

- 5.9 Submission of the Final Proposal does not implement change. It is for Government to decide which proposals meet the published criteria. Only Government can run the statutory consultation that will cover all of Sussex. That consultation will present the proposal(s) Ministers judge viable, enabling residents and partners across the county to have their say before any decision is taken on implementation.

## **6. Financial Implications**

- 6.1 Local government reorganisation has the potential to unlock significant annual savings. Financial modelling undertaken by Ignite suggests that, once fully implemented, net benefits could reach around £52 million to £60 million per year by year ten across Sussex. These figures are indicative and should not be relied upon in the Council's medium-term financial strategy without further validation and delivery planning.
- 6.2 Financial modelling included in these proposals has been undertaken by Ignite, drawing on publicly available financial data from across Sussex and Brighton, with assumptions for costs of change and potential benefits based on experience of LGR elsewhere in the country and research carried out in other county areas.
- 6.3 Modelling shows uneven pressures across the unitary areas. The largest in-year shortfall before transformation is around £75 million (9% of expenditure), with others showing smaller pressures and one showing a surplus. This illustrates that some councils would begin life under tighter financial strain than others, if no adjustments are made for this through the Fair Funding Review.
- 6.4 There are a number of factors that we believe are not adequately reflected in the proposed needs assessment formulas:
- Housing Costs: Brighton & Hove has some of the highest housing costs outside London, yet this is not factored into the cost of delivering services. We face over £25 million in pressures in temporary accommodation and social care placements in 2026/27 alone.
  - Urban and Coastal Pressures: As an urban coastal authority, we experience high levels of complexity in adult social care, particularly linked to mental health and substance misuse, contributing to significant additional service pressures.
  - Children and Young People's Services (CYPS): The formula does not reflect key drivers such as SEND and parental risk factors.
  - Tourism and International Visitors: Our economy is significantly shaped by international visitors, yet this is not captured in the proposed formulas.
  - Remoteness Factors: The removal of urban weightings in areas such as highways maintenance further disadvantages cities like ours.

- 6.5 The costs of reorganisation and transition are significant, ranging from and estimated £109m to £197m with the five authority model being the most expensive and complex to deliver.
- 6.6 It is unrealistic to assume that existing authorities across Sussex will be able to fund the costs of reorganisation and transition from existing reserves and budgets, these costs will need to be funded by central government. Councils across Sussex face significant financial challenges, particularly in respect of statutory, demand led services such as adults and children's social care, temporary accommodation and SEND. It is also important to understand that reorganising local government, whether the end result is a 3, 4 or 5 unitary model, will not deal with these underlying challenges. There is currently insufficient funding across the sector and the scale of savings from LGR is fairly marginal compared to the underlying and growing cost pressures faced by authorities in the region.
- 6.7 Cabinet is asked to note that the Council will request the following from Government as part of submission:
- capacity funding to support transition costs to ensure safe delivery of services over this period;
  - clear technical directions on debt, reserves, opening balances and council tax harmonisation;
  - recognition of particular coastal and other demographic pressures in the Fair Funding Review and in future multi-year settlements.

Finance Officer consulted: John Hooton

Date: 16/09/2025

## **7. Legal Implications**

- 7.1 The relevant legislation is the Local Government and Public Involvement in Health Act 2007 (the Act). Under Section 2 of the Act the Secretary of State has issued an invitation to councils in East Sussex and to Brighton & Hove City Council to submit proposals for a single tier of local government. The invitation and subsequent feedback confirm that councils may also explore options across a wider geography within a strategic authority area.
- 7.2 The Act provides for different "Types" of proposal. The proposals in this report are a combination of Type B (a single tier covering one or more existing districts) and Type C (a single tier covering districts in a county together with one or more adjoining areas).
- 7.3 The Council is required to submit a Base Proposal framed on whole district boundaries to satisfy the statutory requirement to ensure the submission is valid. In addition, Cabinet is asked to approve a request for ministerial modification under Section 7 of the Act so that the Secretary of State may consider a refined five-unitary model.
- 7.4 Section 7 gives the Secretary of State power to implement proposals, with or without modification, but prevents any Order being made unless consultation

has been carried out with all affected authorities and others considered appropriate. This statutory consultation will be led by Government and is separate from the Council's own engagement activity.

- 7.5 If Government decides to proceed, the necessary legislation will be prepared in the form of a Structural Changes Order (SCO) for parliamentary approval. The SCO will establish the new single tier of local government and make provision for the abolition of predecessor councils. The Secretary of State may, where appropriate, designate an authority as a Continuing Authority with boundary changes rather than abolishing and creating a new authority. This is the request being made in relation to the proposed Unitary Authority 'A', including Brighton & Hove.
- 7.6 The SCO would place a duty on all affected councils to co-operate, to provide information as reasonably requested, and to prepare for the transfer of functions, property, rights and liabilities.
- 7.7 If implemented, there will be significant contractual, property and staffing implications requiring further legal advice, which will be addressed through the transition process.

Legal Officer consulted: Elizabeth Culbert  
Date: 16/09/2025

## **8. Equalities Implications**

- 8.1 An initial high-level Equality Impact Assessment (EIA) has been prepared to support this submission. The EIA has reviewed the potential impact of Local Government Reorganisation on residents across Brighton & Hove and the potential merger areas, using the nine protected characteristics and additional factors such as poverty, socio-economic disadvantage, migrant and refugee status, and homelessness.
- 8.2 The assessment identifies both potential positive and negative impacts. Potential positive impacts include improved coordination of services, the extension of Brighton & Hove's equalities expertise and infrastructure across a wider geography, and greater consistency in service standards. Potential risks include dilution of minority voices within a larger authority, reduced proportional representation for some groups, rural access challenges, the loss of specialist services if rationalised, and uncertainty during the transition period.
- 8.3 These risks are consistent with those identified in other areas undergoing reorganisation. The EIA concludes that the Council should "proceed with caution", with mitigation measures built into delivery. These include:
- maintaining parish and neighbourhood voice and representation, with consideration of neighbourhood standards in new councils
  - ensuring day-one continuity of services, especially safeguarding and support for vulnerable groups
  - retaining local access points for essential services, with accessible transport and non-digital routes for engagement

- embedding cultural competency training and inclusive service design in the new authorities
  - protecting minimum funding levels for specialist services
  - collecting and monitoring equalities data consistently across the new councils
- 8.4 The EIA notes that the forthcoming statutory consultation by Government will provide further opportunity for engagement with groups most affected, and that a full, boundary-specific EIA will be required once the Secretary of State has confirmed the final geography. The EIA will be updated at key milestones during transition if Government proceeds.
- 8.5 Cabinet is asked to note that equality considerations are live throughout the process, that risks have been identified transparently, and that further work will be brought forward alongside transition planning should Government decide to proceed.

## **9. Sustainability Implications**

- 9.1 Local Government Reorganisation is not being driven by net zero or place-shaping objectives. However, a single-tier structure could provide opportunities for more coherent planning across wider functional geographies. In particular, integration of local transport, planning, housing and climate strategies may be easier where responsibility is consolidated in one authority.
- 9.2 Engagement referenced environmental and infrastructure issues, and respondents highlighted transport and sustainability as matters of concern. Should Government decide to proceed, there will be opportunities to align climate action, coastal management, and infrastructure investment at a more strategic level within each new council and in partnership with a Sussex Mayoral Combined Authority. These opportunities will be assessed in detail as part of transition planning. This includes opportunities to coordinate coastal management and flood risk programmes across coherent geographies.

## **10. Health and Wellbeing Implications**

- 10.1 Local Government Reorganisation creates an opportunity to strengthen health and wellbeing by giving each area a single, accountable council for adult social care, children's services and public health. This can make local services easier to navigate, reduce hand-offs, and give clearer place leadership for prevention and early help.
- 10.2 NHS Sussex has noted concerns about disruption to coterminous boundaries. The health system itself is also restructuring and operating at larger scale. In this context, a five-unitary map would provide the NHS with a stable set of comparable local partners and create a stronger platform for neighbourhood models of care. While there are concerns about disruption, LGR offers the potential to create clearer local partners for the NHS and a stronger basis for neighbourhood working. With strong safeguards in place,

it provides an opportunity to protect what works well and make services more consistent and accessible for residents.

## **11. Conclusion**

- 11.1 Cabinet is asked to agree that the balanced five unitary model set out at Appendix 1 be submitted to Government as the Council's Final Proposal. The statutory Base Proposal, required under the Local Government and Public Involvement in Health Act 2007, will accompany the submission to ensure validity.
- 11.2 Submission does not implement change. Government will assess proposals against the published criteria, decide which to take to statutory consultation, and only then determine whether to bring forward a Structural Changes Order.
- 11.3 In the Council's judgement the five unitary model proposed best meets the six criteria. Three and four unitary options are cheaper and simpler to deliver but leave uneven size and weaker resilience. Five carries higher one off costs but avoids extremes of scale, offers greater long term benefits, and provides five comparable partners for future devolution.
- 11.4 Cabinet is asked to note the financial risks set out in Section 6 and the need for strong safeguards if Government proceeds. If reorganisation is implemented, the Council will prioritise Day 1 continuity of services, protection of vulnerable residents, and close partnership with NHS and other agencies to ensure a safe and effective transition.

## **12. Supporting Documentation**

Appendix 1 – 'Representative Councils for a Devolved Sussex: A Five Unitary Proposal submission for Local Government Reorganisation'.

Appendix 2 - LGR Engagement Document, July to August 2025



# Representative Councils for a Devolved Sussex: A Five Unitary Proposal



Submission for  
Local Government Reorganisation  
September 2025





# Contents

<b>Foreword</b>	<b>4</b>
<b>Executive Summary</b>	<b>5</b>
<b>1 National and Legal Context</b>	<b>11</b>
<b>2 The Case for a New Beginning</b>	<b>14</b>
<b>3 Options Considered &amp; Methodology</b>	<b>17</b>
<b>4 The Base Proposal using whole districts as building Blocks</b>	<b>21</b>
<b>5 Our proposal for five balanced Councils for Sussex</b>	<b>23</b>
5.1 Our proposed five unitaries	23
5.2 Government criteria at a glance: five balanced councils	24
5.3 Request for ministerial modification to the Base Proposal	28
<b>6 Proposed council profiles (Unitary A–E)</b>	<b>32</b>
<b>7 Comparison with other proposals for Sussex</b>	<b>46</b>
<b>8 Engagement: what we heard and how it shaped this footprint;</b>	<b>50</b>
<b>9 Finance and resilience</b>	<b>53</b>
<b>10 Services and delivery</b>	<b>60</b>
<b>11 Democracy &amp; Local Voice</b>	<b>63</b>
<b>12 Our plan for delivery</b>	<b>65</b>
<b>13 Risks and Dependencies</b>	<b>69</b>
<b>14 Our asks of government</b>	<b>72</b>
<b>15 Where to find the detail; Appendix A: financial model methodology</b>	<b>73</b>



# Foreword

**Sussex is at a once in a generation turning point. Government has invited us to bring forward proposals for simpler and stronger local government, alongside new devolved powers for our region. We welcome the opportunity and the challenge. This is our chance to design councils around how people actually live, to make everyday life easier, services better, and local democracy closer to home.**

Change on this scale is unsettling. It is also necessary. Too often our current boundaries cut through communities, decisions feel distant, and responsibility is unclear. Our vision is for councils that are big enough to be resilient and small enough to stay connected, places where local pride and local voice shape what happens next.

This is not just about lines on a map. It is about the experience of residents. It means services that are easy to reach and joined up. It means decisions informed by lived experience and made with our communities, not for them. It means neighbourhood led partnerships with the NHS, schools, police and the voluntary sector so that support feels seamless when people need it most.

For the coast, we see one authority for a continuous coastal city that reflects the reality of a shared place and daily journeys. But this vision is wider than the coast alone. Across Sussex as a whole, we propose five councils, balanced in population size. Each would serve around three to four hundred thousand people, large enough to be financially resilient and small enough to remain rooted in local communities. Together they form a family of councils with clear responsibility and strong accountability, able to stand as equal

partners in a devolved Sussex. This is not about one place growing at the expense of another. It is about the whole of Sussex being set up to succeed, with every community recognised and every council built on a scale that works.

We have written this proposal so that people and partners across Sussex can compare approaches and judge them on their merits. Our commitment is to be constructive, open and ambitious, protecting local identity, simplifying daily life and giving Sussex the foundations to thrive for the next generation.



**Councillor Bella Sankey**  
**Leader of Brighton & Hove City Council**

# Executive Summary

## Purpose and submission

Government is reshaping local government across England to make responsibilities clear, remove duplication and make services easier to use. At the same time, new powers over transport, skills, growth and net zero are being devolved to directly elected Mayors and their Strategic Authorities. In this context we are invited to bring forward a proposal for unitary local government covering East Sussex and Brighton and Hove, with the option to consider wider boundaries where this would improve sustainability and support devolution.

Our Base Proposal is presented with whole districts as the building blocks to comply with the Local Government and Public Involvement in Health Act 2007. The Base Proposal is submitted for legal compliance. We ask Ministers to consider modifications to the Base Proposal that, in our judgement, better meets the public service, financial sustainability and local identity tests. The

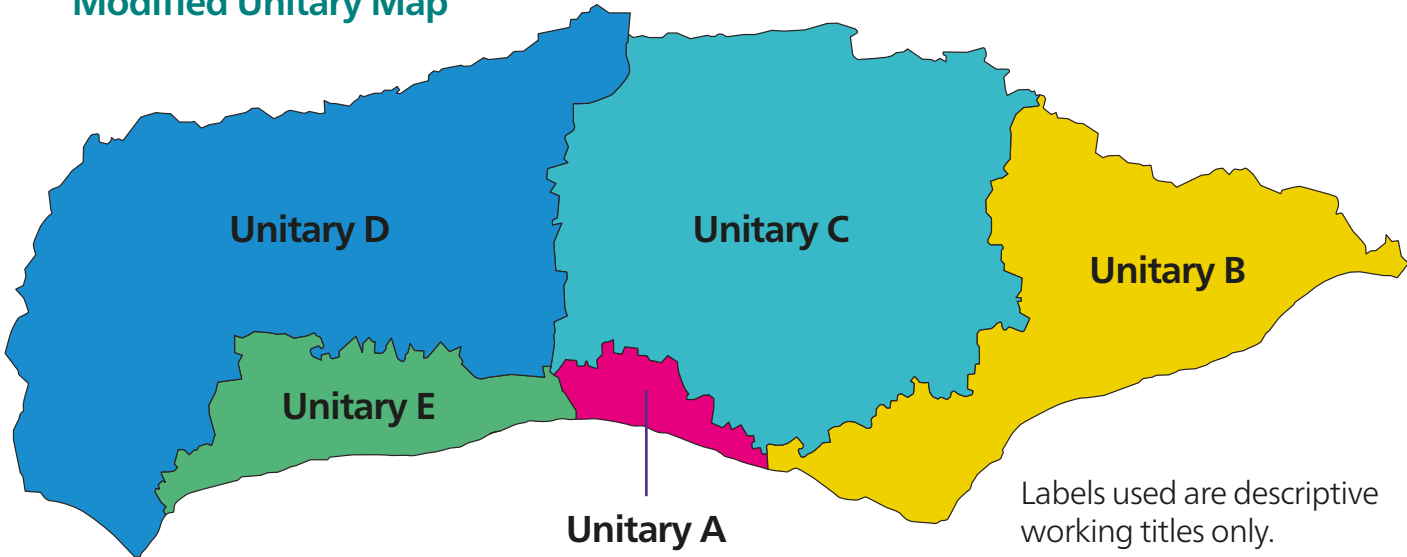
Modified Proposal is, in our view, the option that best meets the invitation criteria.

Our Modified Proposal is stronger than the Base Proposal as it aligns boundaries to daily travel-to-work and study routes, balances populations so no council is unusually large or small, and groups services in ways that support regeneration, health access and local accountability. This improves service coherence and financial sustainability while keeping communities whole.

## A balanced Sussex-wide model

Our Modified Proposal creates five councils, each serving between approximately 300,000 and 400,000 residents. This balance avoids extremes of scale, gives every area councils that are large enough to deliver complex services, and keeps them small enough to stay rooted in their communities. Together they serve 1.72 million residents, providing a strong and resilient platform for devolution.

## Modified Unitary Map



Labels used are descriptive working titles only.

New Authority	Existing authorities/wards	Population
Unitary A	<b>Brighton &amp; Hove</b> (all wards)  <b>The following wards from Lewes District Council:</b> East Saltdean & Telscombe Cliffs, Peacehaven West, Peacehaven East, Peacehaven North, Falmer Parish (from Kingston ward)	<b>301,130</b>
Unitary B	<b>Eastbourne</b> (all wards) <b>Rother</b> (all wards) <b>Hastings</b> (all wards)  <b>The following wards from Lewes District Council:</b> Seaford South, Newhaven North, Seaford West, Seaford North, Seaford Central.  <b>The following wards from Wealden District Council:</b> Pevensey Bay, Lower Willingdon, South Downs, Herstmonceux & Pevensey Levels, Polegate South & Willingdon Watermill, Stone Cross, Upper Willingdon, Polegate North, Polegate Central.	<b>359,868</b>
Unitary C	<b>Mid Sussex District Council</b> (all wards)  <b>The following wards from Wealden District Council:</b> Uckfield, Ridgewood & Little Horsted, Uckfield North, Arlington, Uckfield New Town, Withyham, Crowborough, South West Hailsham, Central Hailsham North Uckfield, East Framfield & Cross-in-Hand, Hadlow Down & Rotherfield, Hailsham North West Mayfield & Five Ashes, Chiddingfold, East Hoathly & Waldron, Crowborough, St Johns Frant & Wadhurst, Crowborough North, Forest Row, Buxted, Hailsham South, Hailsham West, Hartfield, Horam & Punnetts Town, Heathfield South Crowborough, Jarvis Brook, Crowborough Central, Maresfield, Crowborough South, East Danehill & Fletching, Heathfield, North Hailsham East Hellingly  <b>The following wards from Lewes District Council:</b> Lewes Castle, Kingston (without Falmer Parish), Plumpton, Streat, East Chiltington & St John, Ouse Valley & Ringmer, Lewes Bridge, Lewes Priory, Ditchling & Westmeston, Newick, Chailey, Barcombe & Hamsey, Wivelsfield	<b>322,617</b>
Unitary D	<b>Chichester</b> (all wards), <b>Horsham</b> (all wards), <b>Crawley</b> (all wards)	<b>394,308</b>
Unitary E	<b>Arun</b> (all wards), <b>Adur</b> (all wards), <b>Worthing</b> (all wards)	<b>343,098</b>

Unitary A

Approximately 301,000 residents

**Why this council works:** Brings together Brighton, Hove, Saltdean, Peacehaven, Telscombe and Falmer Parish as one continuous urban coastal area, aligning services with the way people already live, study and travel.

**People:** The youngest and most diverse part of Sussex, with only 13.5 per cent of residents aged 65 or over compared to more than 23 per cent in West Sussex and 26 per cent in East Sussex. Strong student, commuter and family populations drive demand for housing, prevention and accessible services.

**Place:** Neighbourhoods along the seafront already function as a single city region. Falmer links through universities, the Amex Stadium and health services. This helps align the Brighton Kemptown constituency boundary which includes East Saltdean, Peacehaven and Telscombe.

**Infrastructure and anchors:** The A259 and Coastway rail bind the corridor. Universities, hospitals, cultural venues and the visitor economy provide major anchors.

**Criteria check:** Within expected population range, resilient, matches travel-to-work patterns, protects identity.

Unitary B

Approximately 360,000 residents

**Why this council works:** Unites the eastern Sussex coast so regeneration, health prevention and transport can be planned for one connected community.

**People:** Older age profiles and some of the starkest health inequalities in Sussex. In Hastings and Rother, over one in five adults

report a limiting long-term illness. Wages are below the South East average.

**Place:** Eastbourne, Hastings, Rother, Seaford and Newhaven with nearby Wealden communities such as Polegate and Willingdon that already rely on Eastbourne.

**Infrastructure and anchors:** The A259, East Coastway and Seaford rail lines connect the shoreline. Eastbourne District General and Conquest Hospitals provide health anchors. Newhaven Port is an international gateway.

**Criteria check:** Balanced population, aligns with service and travel patterns, supports regeneration, protects identity.

Unitary C

Approximately 323,000 residents

**Why this council works:** Creates one council for market towns, villages and rural communities that share daily commuting north to London and south to Brighton.

**People:** Employment is high (around 79 per cent), but the population is ageing quickly, with strong growth forecast in the over-65 and over-85 age groups. Families, commuters and older residents need reliable health and care services.

**Place:** Mid Sussex with towns such as Uckfield and Crowborough and Lewes hinterland villages that look north for work and education. Local character preserved through parish and town councils.

**Infrastructure and anchors:** The Brighton Main Line, Thameslink, Uckfield rail line and A23/A22 connect to London, Gatwick and Brighton. Market towns, education hubs and health services act as anchors.

**Criteria check:** Balanced population, supports growth and infrastructure, protects identity.



Unitary D

Approximately 394,000 residents

**Why this council works:** Links Crawley, Horsham and Chichester, combining an international gateway with historic towns and rural communities.

**People:** Crawley has a younger and more diverse population, with median monthly wages around £2,576 but a claimant unemployment rate above 4 per cent. Horsham and Chichester bring older age profiles and extensive rural settlements.

**Place:** The economy of Gatwick and Manor Royal connects with historic towns and the South Downs. Parish and town councils safeguard accountability.

**Infrastructure and anchors:** Gatwick Airport, Manor Royal, Goodwood, the University of Chichester and the South Downs National Park. The M23, A23 and A27 roads and the Arun Valley and Horsham rail lines provide connectivity.

**Criteria check:** Balanced population, links key economic anchors with communities, supports devolution, protects identity.

Unitary E

Approximately 343,000 residents

**Why this council works:** Brings together Arun, Adur and Worthing as one coastal strip, reflecting the shared identity and daily life of seaside towns.

**People:** Among the oldest age profiles in Sussex, with high demand for health and care services. The coastal economy mixes tourism, marine industries, horticulture and a growing creative sector.

**Place:** Worthing, Littlehampton, Shoreham and Bognor Regis share housing markets, labour patterns and seafront challenges. Parish and town councils continue.

**Infrastructure and anchors:** The A259 and West Coastway rail connect the coast. Worthing Hospital, Shoreham Port, Littlehampton Harbour and seafront economies act as anchors.

**Criteria check:** Balanced population, coherent for coastal renewal and flood planning, strengthens health and care resilience, protects identity.

How this proposal meets the Government’s criteria

Right size and scale

Each council serves between 301,000 and 394,000 residents. All fall within a tight band that gives resilience for adult and children’s services while staying close to communities. Collectively they form a county-wide population of 1.72 million, providing balance and strength for devolution.

High-quality and sustainable services

Single-tier councils remove duplication between counties and districts and place clear accountability in one unitary for each area. This makes services easier to use, decisions faster and integration with health, education, police and voluntary sectors more effective.

Financial sustainability

The model reduces duplication, streamlines management and aligns contracts and estates. Transition costs are real but will be paid back within a small number of years, after which recurring savings improve sustainability. For all councils, social care, SEN and Homelessness funding pressures remain, requiring national reform. This model acknowledges the financial pressures that already exist within the Sussex system and provides the opportunity for genuinely local transformation and engagement to address it in the years to come. It also provides a clearer framework of need to

engage central government, the wider public sector partners and the Mayoral Authority in rebalancing those pressures. Where individual councils face tighter financial margins, mitigations include shared platforms and procurement, phased policy convergence and reserve guardrails.

Local collaboration and consensus

This is a single coherent proposal for Sussex that allows clear comparison with East Sussex’s preferred option. It has been developed with input from partners and over 2,000 residents, whose feedback has shaped protections for parishes, clarified accountability and kept councils within a recognisable scale.

Support for devolution

The five balanced councils provide equal and stable partners for a Sussex Mayor. Together they create one transport voice, a visible investment pipeline and a skills framework that can move from plan to delivery.

Community engagement and neighbourhood empowerment

Councillor numbers and warding will follow LGBCE principles for fair representation and community identity. As an interim, election-ready scheme we propose using existing county electoral divisions as building blocks in four of the five councils, generally with two members per division, and a bespoke scheme where local circumstances require. This creates around 297 councillors across the five councils (typically 54–67 per council) and delivers elector-to-councillor ratios mainly in the 3,600–5,100 range, pending a full LGBCE review post-vesting day.

Parish and town councils remain with their existing powers and precepts, supported by neighbourhood charters and local access points to keep decisions close to communities.

Service delivery and lived experience

On day one there will be continuity: bins collected, care provided and front doors to services kept open. Over time services will become simpler and more responsive. Each council will have one website, one account and one main number. Policies will be harmonised fairly within each footprint and council tax aligned over a transparent glidepath. Decisions will be made with communities, not for them, so lived experience shapes priorities.

Financial case in outline

Change has costs and unlocks recurring savings. Estimated transition costs, savings and payback are set out in the financial case. Savings are driven by removing duplication, streamlining management and aligning contracts and estates. Overall, the model delivers prudent payback in a small number of years followed by sustained annual savings.

Top risks and mitigations

Reorganisation carries transition risks, particularly in ICT and finance, but these are recognised, openly managed and mitigated through phased delivery, dual running and independent assurance.

Transition disruption: managed through phased cutover, dual running and strong programme controls.

ICT and data migration: staged and supported by interoperable systems.

Funding reform and stranded liabilities: addressed through early dialogue with Government and prudent reserves.

Programme assumptions

Shadow arrangements from April 2027 and vesting from April 2028, subject to Government consultation and ministerial decision.





# 1. National and Legal Context

## Why Change now

Government has set out a national programme to simplify two-tier areas where appropriate into single unitary councils and to devolve more powers for transport, skills, growth and net zero to directly elected Mayors and their Strategic Authorities. The English Devolution White Paper (December 2024) and the English Devolution and Community Empowerment Bill provide the policy and legislative framework for local government reorganisation and devolution in Sussex.

In February 2025, MHCLG invited principal authorities in East Sussex and in Brighton and Hove, and principal authorities in West Sussex, to bring forward proposals for unitary local government for the invitation area. The invitation allows exploration of wider boundaries where this would improve sustainability and support devolution, and asks councils to evidence how proposals meet the published criteria and enable easy comparison across Sussex.

## The statutory route under the 2007 Act

Structural and boundary changes are made under the Local Government and Public Involvement in Health Act 2007:

- Invitation and proposal. The Secretary of State invites proposals. Principal authorities submit a single, coherent proposal for the invitation area, supported by evidence.
- Assessment and consultation. Government assesses proposals against its criteria and carries out statutory consultation before any decision is taken.

- Decision and implementation. If satisfied, the Secretary of State may implement change by making a Structural Changes Order. The Order provides for transfer of functions, property, rights and liabilities, staffing and pensions, and may establish a shadow period or designate a continuing authority. Government may also issue directions to protect financial stability during transition.
- Electoral arrangements. Interim electoral provisions are set out in the Order. The Local Government Boundary Commission for England then undertakes a review to settle longer-term electoral arrangements.
- Proposals are normally framed using existing district boundaries as building blocks. Where boundary change is sought, this must be presented as a request for ministerial modification, supported by clear public service and financial sustainability justifications. Our request for modifications is evidence-based, and designed to improve service coherence, financial resilience and community identity.

## Interim plans submitted in Sussex

All Sussex partners provided interim plans in March 2025:

East Sussex councils set out a preference for a single unitary on the existing county boundary ("One East Sussex"), emphasising scale, continuity and collaboration.

- West Sussex councils described options and dependencies and sought clarity on population steers, timelines and the interface with the Mayoral Strategic Authority, without selecting a single preferred model at the interim stage.



- Brighton & Hove submitted an interim plan that described the unique character of the area, our early engagement feedback and the options that would be explored. We indicated that, if feasible, a five-unitary Sussex-wide model would provide the most balanced and sustainable structure.

Government feedback on interim plans

In June 2025 MHCLG published national feedback on interim plans. It did not approve or reject options. It asked areas to use common assumptions and datasets, to present evidence clearly against the six criteria, and to format proposals so that residents and partners can compare proposals side by side. Officials invited further dialogue to refine cases ahead of final submissions.

The interim plan feedback requested that where a proposal contained a preferred option for a single tier of local government across the whole of the proposed Sussex and Brighton MSA area, such as an option for five unitary councils across Sussex, it is recommended that the impacts for both invitation areas are set out. The interim plan feedback also clarified that existing district areas should be considered the building blocks for proposals, but that where there is a strong justification more complex boundary changes will be considered.

How this proposal meets the Government’s six criteria

This document is deliberately structured against the six criteria set out in the invitation, to enable clear and auditable assessment. A summary of this is included in the Executive Summary.

Indicative timelines and dependencies

The invitation set an indicative pathway from proposal development to consultation and, if Ministers decide to proceed, to the making of a Structural Changes Order. The sequence and timing are for Government to determine and may change. Our delivery plans therefore identify the decisions only Government can make, set out the steps we will take once those decisions are confirmed, and build in safeguards from recent reorganisations, including phased implementation, external assurance and clear financial directions.

How this document responds

- We present a five-unitary council base case with whole district councils as the building blocks and request a ministerial modification to adopt refined boundaries where this better meets the criteria.
- We have aligned headings and assumptions so assessors, residents and peers can compare like-for-like with East Sussex and West Sussex interim work.
- We have consistently indicated that, subject to feasibility, a five-unitary Sussex model could provide the most balanced and sustainable structure if it could be made to work. This final proposal shows how that can now be delivered.
- We set out the Government’s six criteria next, followed by our options and shortlisting, our modified five-unitary authority model, and the base case it is built from.

Key documents and references

**English Devolution White Paper (Dec 2024)**  
*Sets the national direction: simplify two-tier areas into unitary councils and devolve powers to Mayors and Strategic Authorities.*  
[Read the White Paper](#)

**English Devolution and Community Empowerment Bill (2024–25)**  
*Provides the legislative framework for unitarisation and neighbourhood governance.*  
[Read the Bill](#)

**MHCLG invitation letter (Feb 2025)**  
*Invited East Sussex, Brighton & Hove, and West Sussex councils to bring forward proposals, with scope to explore wider boundaries.*  
[Read the invitation](#)

**East Sussex interim plan (Mar 2025)**  
*Preferred option: “One East Sussex” — a single county-wide unitary, emphasising scale, continuity and collaboration.*  
[Read East Sussex’s interim plan](#)

**West Sussex interim submission (Mar 2025)**  
*Explored one or two unitaries, flagged dependencies on Brighton’s footprint and Crawley’s alignment, no preferred option.*  
[Read West Sussex’s interim submission](#)

**Brighton & Hove interim plan (Mar 2025)**  
*Tested a coastal unitary footprint and signalled that a five-unitary Sussex model could be the most balanced option.*  
[Read Brighton & Hove’s interim plan](#)

**MHCLG national feedback on interim plans (Jun 2025)**  
*Did not approve or reject options. Called for common datasets, clear evidence against six criteria, and like-for-like comparability.*  
[Read national feedback](#)

**Sussex feedback pack (Jun 2025)**  
*Collated MHCLG feedback on East Sussex, West Sussex and Brighton & Hove interim plans.*  
[Read Sussex feedback pack](#)

## 2. The Case for a New Beginning

This section explains why change is needed across Sussex, the outcomes we want for residents and partners, and the principles that shape a stronger map for local government and devolution.

### Why change is needed now

People in Sussex deal every day with a system that is too complicated, too slow and increasingly fragile. Residents are passed between tiers and families are sometimes unsure whether to call the district or the county. Boundaries cut across daily life. Prevention and early help often stop at the council line, even though health, education and care pathways cross them every day.

Services are under strain. Adult social care, children’s SEND and homelessness are rising faster than budgets. Without reform, councils will struggle to cope.

Duplication drives cost. Partners can find themselves repeating conversations across several councils before decisions are taken, delaying investment and reducing efficiency.

Doing nothing risks costing more and delivering less. Standing still risks weaker resilience in services and leaves residents with a system that is harder to use.

### What people told us

Over 2,300 people took part in our second round of engagement. Responses were self-selecting and not statistically representative, but they gave clear insight. As in other parts of the country, many were sceptical about structural reform. Within that, residents and partners consistently set out

the safeguards they would want if change proceeds. Concerns included identity and representation, trust and governance, services and infrastructure, finance, vulnerable groups, boundaries and process.

We have treated these as design conditions. Our proposal reflects them through indicative right-sized councils of around 300,000 to 400,000 residents (subject to statutory consultation), neighbourhood charters to support parish and town voice, a Day-1 continuity principle for services, safeguards in principle on finance, and clearer accountability about who does what.

Full details of engagement are set out in section 9.

### Functional Sussex: councils designed around how people live

People in Sussex routinely cross council lines to use schools, hospitals, workplaces, libraries and leisure facilities. Organising local delivery and accountability around lived geographies could support:

- **Devolution readiness.** The Mayor working with a small number of stable, expert councils anchored in functional geographies.
- **Design once, deliver locally.** Prevention standards and service pathways set once per corridor, so people do not face different rules town by town.
- **Clearer accountability.** Residents having a defined local lead for the services they use most; partners having fewer, more consistent relationships.

This approach is expected to give people fairer access, clearer rules and faster action; to make services simpler and more consistent across the places they actually use; and to enable Sussex to present a clearer national voice while keeping councils recognisable and close to communities.

Illustrative corridors already cut across current boundaries:

#### South coast corridor

The A259 and the Coastway rail lines link communities from Hastings and Eastbourne through Seaford, Newhaven, Peacehaven, Saltdean and Brighton & Hove, continuing west towards Worthing and Chichester. Aligning local delivery here could bring consistency to services such as admissions, travel concessions and social care, support joined-up regeneration, and provide the Mayor with clear partners on coastal priorities.

#### North–south spines

The Brighton Main Line and Thameslink services connect Mid Sussex and Crawley directly to Gatwick and London. Horsham links in via the Arun Valley line. Treating these routes as functional geographies could support planning around stations, integrate prevention with NHS providers and colleges, and give the Mayor clear partners for rail, skills and investment.

#### Gateways: ports and the airport

Gatwick Airport, together with Newhaven and Shoreham ports, are gateways of regional and national significance. Littlehampton harbour plays a more local role. Aligning councils to these gateways could ensure local impacts are managed

coherently while enabling the Mayor to lead on trade corridors, freight strategy, decarbonisation and national investment.

#### Rural Sussex: east and west

In the east, market towns such as Uckfield and Crowborough anchor the High Weald. In the west, Chichester and the South Downs sustain farming, visitor economies and green industries. Recognising these rural systems could bring services into a single local approach tailored to dispersed settlements, ensure parish and town voices are designed-in, and give the Mayor rural counterparts on connectivity, investment and climate resilience.

### What good looks like for Sussex

The case for reform is not about structure for its own sake. It is about councils that are simpler to navigate, safer for services and closer to communities. The Government’s six tests are the guardrails that ensure any proposal delivers those outcomes. Our interpretation for Sussex is to create councils that are local where it matters and scaled where it helps.

- Local means councils people recognise, a single accountable route for services, neighbourhood voice designed in, and visible local access.
- Scale means councils large enough to deliver high-risk services safely, withstand financial shocks, sustain professional depth and act as credible partners to the NHS, education, police, Government, investors and the Mayor.



Meeting the six tests

1. Establishing a single tier of local government.

For residents this means one accountable council for local services in each area, so people are clear who to turn to. The aim is to simplify responsibility and reduce duplication. The exact configuration will be tested further in the statutory process.

2. Councils of the right size.

Councils must be large enough to run complex services and resilient enough to absorb shocks, while still being recognisable. We believe that councils in the 300,000–400,000 range may best balance local identity with resilience, subject to statutory consultation and ministerial decision.

3. High-quality and sustainable services.

The priority is safe continuity. On day one residents should continue to use services in the same way. In the longer term aligning councils to lived geographies can make prevention more consistent and allow focus on local pressures such as coastal deprivation, growth around Gatwick or rural access.

4. Collaboration and local views.

Engagement was sceptical about reform but surfaced clear conditions for support: recognisable councils, clear accountability and neighbourhood voice. These conditions are embedded in the design. Only the statutory consultation can test all options across Sussex.

5. Support for devolution.

Sussex is preparing for a Mayoral Strategic Authority. Right-sized councils aligned to lived geographies could provide the Mayor with a small number of expert, democratically accountable partners, improving pace and clarity of decisions on transport, skills, housing growth and net zero.

6. Stronger community engagement and neighbourhood empowerment.

Parish and town councils will remain with their existing powers and precepts. It is anticipated that new authorities will consider mechanisms such as neighbourhood charters and locality arrangements. Local access could be maintained through existing hubs. Specific mechanisms would be determined locally through democratic processes.

3. Options Considered & Methodology

This section explains how options were appraised and how we reached our proposal. The Government’s invitation made clear that whole principal authorities are the normal building blocks, but it also allowed for refined boundaries where there is a strong justification.

We therefore assessed both:

- a statutory base case using whole principal authorities (Districts and Boroughs) to meet the requirement under the 2007 Act, and
- alternative maps using wards (and one parish) where this better reflects communities and lived experiences

Considering the whole of Sussex

Although the invitation formally covered East Sussex and Brighton & Hove, the Government’s letter (February 2025) also made clear that proposals could explore wider boundaries where there was justification. All of Sussex is moving towards a single Mayoral Strategic Authority (MSA) and the interim plan feedback invited further detail on how the proposed new structures would support arrangements for the proposed Sussex & Brighton MSA. MHCLG feedback stated that ‘in this regard it would be helpful for proposals to have regard to the model of government that is proposed across the whole Sussex & Brighton area’.

For that reason, and because Brighton & Hove sits between East and West Sussex, we assessed options across the whole of Sussex.

This approach ensures:

- **Coherence for devolution.** The Mayor will need a stable set of constituent councils covering the whole county. Considering Sussex as a whole means the final structure is balanced and credible at Mayoral level.
- **Continuity for residents.** Daily travel and service use cross the East–West line: Coastway, Gatwick and the Downs–Weald corridors all cut across boundaries.

Our starting point

All councils in Sussex face financial pressures from adult social care, special educational needs and homelessness. Reorganisation does not remove those national pressures. Our gateway test was therefore resilience: no new council should be too small to survive or so large that it becomes remote.

We also assessed deliverability and cost of change. More complex options require services to be split and recombined, which increases programme cost and risk in the short term. This cannot be ignored. But we are clear: this is a once-in-a-generation opportunity to reshape local government for the next 30–40 years. That means short-term costs and complexity must be weighed against long-term benefits for residents and communities.

Feedback from engagement reinforced these principles. Residents consistently stressed the importance of councils they recognise, parish and neighbourhood voice, and clearer accountability for services. These conditions were built into our considerations.

Method and evidence

We built a Sussex-wide evidence base from published sources. The same assumptions were applied to every option. Options were assessed against the six Government criteria:

1. A proposal should seek to achieve for the whole of the area concerned the establishment of a single tier of local government.
2. Unitary local government must be the right size to achieve efficiencies, improve capacity and withstand financial shocks.
3. Unitary structures must prioritise the delivery of high quality and sustainable public services to citizens.
4. Proposals should show how councils in the area have sought to work together in coming to a view that meets local needs and is informed by local views.
5. New unitary structures must support devolution arrangements.
6. New unitary structures should enable stronger community engagement and deliver genuine opportunity for neighbourhood empowerment.

Options considered

Three unitaries

- Uneven sizes; some large and remote, others small and fragile.
- Harder collaboration due to imbalance; weaker pooling of risk.
- Fewer partners for the Mayor but with imbalance in size and weight.

Four unitaries

- Stronger short-term pooling; easier to deliver.
- Still unbalanced in size, with larger councils at risk of feeling remote.
- Better match to ICB footprints in the short term, but identity and local connection weaker.

Five unitaries

- More costly transition in the short term.
- Creates balanced councils within a 300,000–400,000 band.
- Better long-term match to how people live; avoids leaving outlier communities underserved.

Whole-district maps either produced councils that were too large and remote, or required costly and disruptive service separation.

Options compares against the Government’s tests

Government test	Three unitaries	Four unitaries	Five unitaries
1. Single tier of local government	Removes the two-tier system, but uneven sizes make consistency harder across Sussex.	Also delivers a single tier, with simpler delivery than five but at the expense of balance.	Single tier across Sussex. Transition more complex, but creates a consistent long-term model for the county.
2. Right size and financial resilience	Councils would be very different in size. Some very large and potentially remote, others relatively small and fragile. Risk pooling is uneven.	Sizes remain unbalanced. Larger councils pool risk in the short term, but are more likely to feel remote from communities.	All councils fall within an indicative 300,000–400,000 band. None too big, none too small. Higher upfront cost, but stronger long-term balance and resilience.
3. High-quality and sustainable services	A single tier reduces duplication, but uneven sizes make collaboration harder and current boundaries do not always match how people use services.	Better aligned than three, but uneven sizes remain.	Stronger long-term fit with how people live. Short-term disruption, but avoids leaving outlier communities underserved and supports prevention at a scale councils can know well.
4. Local collaboration and consensus	Uneven sizes can make joint working slower and require more negotiation.	Risk that one or two larger councils dominate, unless formal mechanisms are added.	Five councils of comparable size collaborate as peers, with less risk of dominance and clearer space for local voice.
5. Support for devolution	Fewer partners for the Mayor, but with uneven size and weight that can distort the county-wide table.	Still fewer partners than five, but uneven size and weight remain.	Five balanced partners for the Mayor, none dominant. A fair and stable set of counterparts for strategy, investment and performance.
6. Community engagement and neighbourhood empowerment	Larger councils increase the risk that places feel distant from decision-making.	Same risk: large councils could blunt local voice without compensating governance.	Councils at the right size to stay connected to communities. Greater scope to design prevention and locality models, with parishes and towns kept intact and supported by charters.

Shortlist

On the combined balance of the six Government criteria, the five-unitary map with modifications is proposed.

- Resilience: all five councils fall within a stable 300,000–400,000 band.
- Deliverability: transition is more complex than three or four, but manageable with a phased approach and worth it to secure the right long-term structure.
- Identity: parishes and towns remain intact, so councils remain recognisable.
- Devolution: five balanced partners for the Mayor, with no single authority dominant.

A four-unitary map pools resources more easily in the short term and is easier to deliver. But over decades it risks councils that are too large and remote, and requires disruptive separation now. Finance is one test among six. On the combined balance, analysis indicates that five unitaries, though harder to deliver, offer the most sustainable long-term balance for Sussex.

Sensitivities and dependencies

National decisions on adult social care, SEND and homelessness funding remain decisive for every option. These pressures account for the majority of future deficits across all Sussex councils and cannot be resolved through reorganisation alone.

The forthcoming Fair Funding Review is particularly important. Its timing creates both risk and opportunity:

- If the Review shifts resources away from areas with older populations or higher social care demand, all Sussex councils will face greater structural pressure.

- Equally, the Review provides an opportunity to address current funding discrepancies across East and West Sussex, where costs of care, transport and housing are high but not always fully recognised in the national formula, and risk not being adequately understood and represented on the national stage by the current large upper tier councils.

Our financial modelling is therefore cautious. It assumes that current funding arrangements continue and that any positive changes from Fair Funding or wider reform (for example multi-year settlements or simplification of grants) will be treated as upside.

Other dependencies include:

- Implementation timetable: sequencing of Orders and elections will affect costs, complexity and deliverability, especially where shadow arrangements are needed.
- ICT and contract transition: scale and cost of data migration and contract transition varies with the number of councils created. More councils means more harmonisation, but also greater resilience once established.
- Neighbourhood governance requirements: expected secondary legislation on neighbourhood charters and representation ratios will shape how local voice is built into each new council.

We have tested sensitivities around population forecasts and inflation assumptions. In all cases the relative balance between options remained the same: four performs best on short-term financial pooling, while five performs best on long-term balance, identity and prevention.

4. The Base Proposal using whole districts as building Blocks

This is a requirement under the 2007 Act. It is not the final proposal we are advancing.

Our substantive Modified Proposal, which requests ministerial modification, is set out in Section 5.

In Section 5 we request a ministerial modification to refine this base case into a balanced five-unitary model for Sussex.

Compliance statement

This section constitutes our Base Proposal on whole district boundaries, prepared in accordance with Part 1 of the Local Government and Public Involvement in Health Act 2007 and the February 2025 invitation. It is a statutory base proposal and is not the final proposal we are advancing. Our substantive proposal, which requests ministerial modification, is set out in Section 5.

Base case configuration

The base case groups existing principal authorities into five unitary councils, without any changes to existing District council boundaries:

**Unitary A:** Brighton & Hove City Council (all wards); Lewes District Council (all wards) - Type C proposal

**Unitary B:** Eastbourne Borough Council (all wards); Hastings Borough Council (all wards); Rother District Council (all wards); Wealden District Council (all wards) - Type B proposal

**Unitary C:** Mid Sussex District Council (all wards) - Type B proposal

**Unitary D:** Crawley Borough Council (all wards); Horsham District Council (all wards); Chichester District Council (all wards) - Type B proposal

**Unitary E:** Arun District Council (all wards); Adur District Council (all wards); Worthing Borough Council (all wards) - Type B proposal



Assessment against the Government’s tests

Government test	Baseline assessment (whole districts, no modifications)
1. Single tier of local government	Creates five unitary authorities using existing principal authorities as building blocks. Meets the invitation’s requirement to set out a base case on whole districts and removes two-tier arrangements within each area.
2. Right size and financial resilience	Produces units of uneven population size (for example, a single-district unit is smaller than a unit comprising several districts). The range in size may have implications for resilience and perceived local connection. The extent of risk pooling would depend on the size of each unit and on the delivery model adopted.
3. High-quality and sustainable services	Establishes single tiers per area, which removes duplication of tiers. The degree of service integration and consistency would depend on local access, locality arrangements and phasing. Uneven population sizes may make collaboration and standardisation more variable across the county.
4. Local collaboration and responsiveness to views	Provides a legally coherent configuration based on administrative boundaries. It does not incorporate ward-level refinements or other adjustments arising from engagement. Transition would require formal collaboration mechanisms between the new councils.
5. Support for devolution	Creates a complete set of constituent councils across Sussex for a Mayoral Strategic Authority. Variation in unit size could affect perceived balance at the Mayoral table and may require compensating partnership arrangements.
6. Community engagement and neighbourhood empowerment	Interim electoral and governance arrangements would ordinarily be set in the Structural Changes Order. A full electoral review by the Local Government Boundary Commission would typically follow vesting to secure appropriate representation and neighbourhood governance in each new unitary.

Dependencies

All decisions on consultation, Orders, electoral arrangements and financial directions rest with Government.

No changes take effect unless and until Government makes a Structural Changes Order following statutory consultation.

5. Our proposal for five balanced Councils for Sussex

This section sets out the proposal we are asking government to consult on and consider. The proposal is a modification of our base case which is based on whole districts in accordance with s2 of the Act, and laid out in section 4

We show the precise areas involved, the rationale for change, and how each option performs against the government’s published tests.

Sussex-wide rationale for five balanced councils

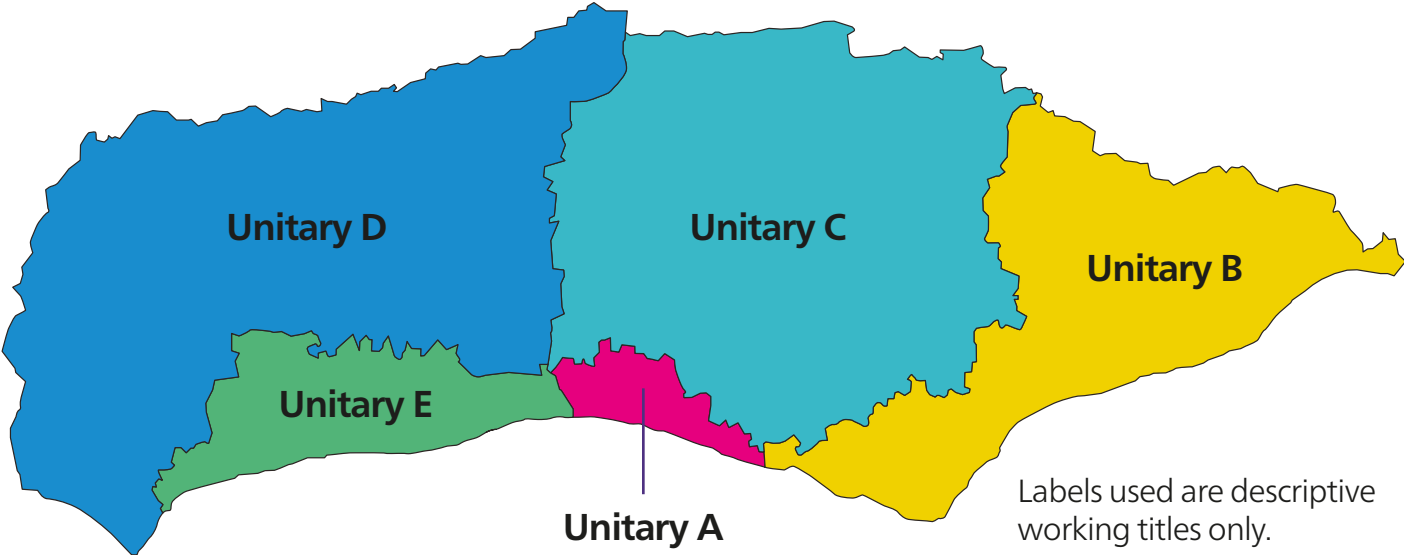
Our proposal creates five new unitary councils that together cover the whole of Sussex. They are designed as a single, coherent family of authorities: each rooted in its local communities, yet collectively strong enough to partner effectively with a Sussex Mayor. Every council falls within a balanced population band of 300,000 to 400,000 residents, avoiding extremes of scale that risk

either fragility or remoteness. Each footprint reflects daily travel-to-work patterns and economic corridors, ensuring that services, growth and infrastructure can be planned once and delivered more effectively.

By keeping parishes and towns intact, the model preserves local identity and accountability, while shared platforms across the five councils reduce cost and risk. This arrangement balances what matters most: resilient councils that can run complex services, neighbourhoods that retain a clear voice, and a county-wide structure that provides a credible foundation for devolution.

Other models were tested, including three or four unitaries. These offered some short-term simplicity but created uneven scales, left some areas feeling remote from decision making, and risked concentrating too much power in one or two very large authorities.

5.1 Our proposed five unitaries





Five councils strike the right balance:

- **Resilient but connected.** Each council has 300,000–400,000 residents, large enough for adult and children’s services, small enough to remain rooted.
- **Functional fit.** Boundaries align to daily travel patterns and economic corridors.
- **Fair partnership.** Five councils of similar size avoid dominance by any one authority and give the Mayor a stable set of partners.
- **Deliverable.** The model allows phased transition and shared platforms to manage complexity.
- **Recognisable.** Each footprint reflects places that residents already identify with and keeps parishes intact.

The five proposed unitaries at a glance

Council (working title)	Areas covered (summary)	Population (approx.)	Indicative councillors*
Unitary A	Brighton, Hove, Peacehaven, Telscombe, East Saltdean, Falmer	301,000	~59
Unitary B	Eastbourne, Hastings, Rother, Seaford, Newhaven, south Wealden communities	360,000	~67
Unitary C	Mid Sussex, Lewes hinterland, Uckfield, Crowborough, northern Wealden towns	323,000	~55
Unitary D	Crawley, Horsham, Chichester	394,000	~62
Unitary E	Worthing, Adur, Arun	343,000	~54

\*Indicative councillor numbers are based on county divisions, scaled to 2–3 members each. Final arrangements would be subject to LGBCE review post-vesting.

5.2 Government criteria at a glance: five balanced councils

Our proposal creates five balanced councils across Sussex. Each falls within an indicative population band of 300,000 to 400,000 residents, avoiding extremes of scale that risk fragility or remoteness. The configuration reflects daily travel and service corridors, keeps principal towns and parishes intact, and ensures councils are similar in size so that none dominates. This creates a fair and stable set of partners for a Sussex Mayor, while ensuring services remain recognisable and local voice is protected. The table below sets out how each proposed council performs against the Government’s six published tests.





Government test	Unitary A (Brighton, Hove, Peacehaven, Telscombe, Falmer)	Unitary B (Eastbourne, Hastings, Rother, Seaford, Newhaven, south Wealden)	Unitary C (Mid Sussex, Lewes hinterland, northern Wealden towns)	Unitary D (Crawley, Horsham, Chichester)	Unitary E (Arun, Adur, Worthing)
1. Right size and scale	Approx. 301k residents. Within the 300–400k indicative band. Continuous coastal and urban corridor avoids extremes of size.	Approx. 360k residents. Within the band. Brings eastern shoreline into one authority without creating an over-large unit.	Approx. 323k residents. Within the band. Keeps market towns and rural areas together at a sustainable scale.	Approx. 394k residents. Upper end of the band but still within range. Combines airport communities, towns and South Downs without dominance.	Approx. 343k residents. Within the band. A coherent west-coast strip at a sustainable size.
2. High-quality and sustainable services	One authority for school admissions, SEND travel and care pathways along the A259/Coastway, reducing hand-offs. Unites eastern coast and Newhaven Port so prevention, health and regeneration can be planned once	Unites eastern coast and Newhaven Port so prevention, health and regeneration can be planned once.	Aligns commuter flows to Gatwick and London; single local approach to rural prevention and family support.	Links Gatwick Airport, Crawley, Horsham and Chichester with surrounding South Downs, allowing coherent planning of services and infrastructure.	Supports coastal renewal, flood management and consistent community health and care along the West Coastway.
3. Financial resilience	Balanced tax base. Shared corporate platforms across five councils anticipated to reduce overheads. Savings to be tracked and verified through implementation and audit.	Larger coastal footprint supports consistent commissioning and shared systems, improving resilience over time.	Mix of growing towns and rural areas. Shared procurement and platform alignment intended to support efficiencies.	Diverse economy around Gatwick and historic towns. Shared back-office systems intended to provide savings once steady state is reached.	Shared coastal challenges addressed jointly. Procurement alignment and platform sharing expected to support recurring efficiencies. Provides a west-coast partner for seafront renewal, flood schemes and skills for coastal sectors.
4. Local collaboration and responsiveness to views	Comparable in size to peers, avoiding dominance. Responds to engagement feedback about recognisable councils and clear accountability. Well placed to collaborate with NHS trusts, universities and the voluntary sector across the city region.	Balances three coastal districts with inland communities. Keeps Seaford and Newhaven with Eastbourne, reflecting feedback. Supports joint work with East Sussex Healthcare NHS Trust, Newhaven Port, FE/HE and regeneration partnerships.	A peer of comparable size to others. Keeps Lewes town and rural hinterland together, responding to engagement. Strong basis for joint work with health, FE/HE and rural networks.	Larger but still within the band, acting as a peer among five. Combines Gatwick with market towns and South Downs, supporting collaboration with airport bodies, employers, FE/HE and rural partnerships.	Provides a west-coast peer of comparable size. Keeps coastal towns together, reflecting identity. Supports joint approaches on flooding, coastal renewal and skills with local partners.
5. Support for devolution	Provides a clear coastal urban partner for the Mayor on transport, skills, growth and net zero.	Provides a single eastern shoreline partner for regeneration, port and transport programmes.	Provides a coherent inland partner aligned to rail spines and rural networks.	Provides a balanced partner linking Gatwick with historic towns and rural areas to the west.	Provides a west-coast partner for seafront renewal, flood schemes and skills for coastal sectors.
6. Community engagement and neighbourhood empowerment	Ward councillors continue under interim arrangements; full LGBCE review post-vesting. Parishes remain in Peacehaven, Telscombe and Falmer. A neighbourhood charter anticipated to set standards across urban neighbourhoods and eastern parishes. Local access maintained through hubs such as libraries and family centres, with further tools to be considered by the new authority.	Ward councillors continue; full LGBCE review post-vesting. Parishes remain across the eastern coast, including Seaford and Newhaven. A neighbourhood charter anticipated to set standards for coastal and inland engagement. Local hubs provide visible access; outreach for vulnerable groups.	Ward councillors continue; full LGBCE review post-vesting. Parishes and market towns remain intact. A rural-focused neighbourhood charter anticipated, with parish partnerships, digital outreach and locality budgets considered by the new authority.	Ward councillors continue; full LGBCE review post-vesting. Parishes remain in Horsham and Chichester; unparished Crawley covered by tailored arrangements. A charter anticipated to formalise standards across towns and villages, with mechanisms such as resident panels considered for issues linked to the airport, skills and transport.	Ward councillors continue; full LGBCE review post-vesting. Parishes remain in Arun; unparished Worthing and parts of Adur covered by tailored neighbourhood arrangements. A coastal charter anticipated to set standards for engagement on seafront renewal, flood schemes and local environment.

5.3 Request for ministerial modification to the Base Proposal

We request that the Secretary of State modifies the statutory baseline described in Section 4, to adopt the boundary refinements set out below. These refinements better satisfy the Government criteria by improving public service coherence, financial sustainability, local identity, and the balance of partners for devolution.

What change is sought

1. Unitary A – Coastal urban council centred on Brighton & Hove

- Transfer from Lewes District: East Saltdean & Telscombe Cliffs ward; Peacehaven West, East and North wards; Falmer parish (from Kingston ward)

2. Unitary B – Eastern coastal council (Eastbourne, Hastings, Rother, part-Wealden, part Lewes)

- Transfer from Lewes District: Seaford South, West, North, Central and East wards; Newhaven North and South wards
- Transfer from Wealden District: Polegate North and Central wards; Polegate South & Willingdon Watermill ward; Upper and Lower Willingdon wards; Stone Cross ward; Pevensey Bay ward; Herstmonceux & Pevensey Levels ward; South Downs ward

3. Unitary C – Rural and market towns council (Mid Sussex, northern Wealden, Lewes hinterland)

- Transfer from Lewes District: Lewes Castle, Bridge and Priory wards; Kingston ward (minus Falmer parish); Newick ward; Chailey, Barcombe & Hamsey ward; Plumpton, Streat, East Chiltington & St John ward; Ouse Valley & Ringmer ward; Ditchling & Westmeston ward; Wivelsfield ward
- Transfer from Wealden District: Uckfield Ridgewood & Little Horsted, North, East and New Town wards; Arlington ward; Buxted ward; Maresfield ward; Hartfield ward; Forest Row ward; Danehill & Fletching ward; Horam & Punnetts Town ward; Heathfield North and South wards; Hellingly ward; Withyham ward; Hadlow Down & Rotherfield ward; Mayfield & Five Ashes ward; Chiddingly, East Hoathly & Waldron ward; Crowborough Central, North, South East, South West, St Johns, Jarvis Brook wards; Frant & Wadhurst ward; Hailsham Central, North, North West, South, West, East wards

4. Unitary D – North Sussex council (Crawley, Horsham, Chichester) - No change.

5. Unitary E – West Sussex coast council (Arun, Adur, Worthing) - No change.

Why this modification better satisfies the tests than the statutory baseline

**Public services.** The modification removes artificial splits created by whole-district boundaries. Seaford and Newhaven are placed with Eastbourne, where residents already travel for schools, hospitals and jobs. Lewes hinterland wards and northern

Wealden towns join Mid Sussex, matching commuting and education flows north and south. This alignment means councils can plan once for the services people actually use, instead of handing off across boundaries.

**Financial sustainability.** The refined map is more complex to deliver in the short term and will bring higher transition costs than whole-district mergers. However, it avoids leaving councils at extremes of size that would be financially fragile or too remote from residents. By creating five authorities in a tighter band of around 300 to 400k residents, the model provides a stronger long-term balance. National pressures in social care, SEND and

homelessness remain, but this structure ensures no council is set up to fail.

**Identity and accountability.** The modification produces councils that people recognise. Parishes and towns are kept whole, with no principal settlement split. Seaford is not separated from its coastal neighbours, Lewes town remains with its rural hinterland, and Peacehaven and Telscombe join the city corridor where they already look. Town and parish councils remain, supported by neighbourhood charters. This ensures local voice is visible and protected, while councils are big enough to carry complex services sustainably.





Comparison of the statutory Base Proposal (whole districts, no ward changes) and the requested Modified Proposal (refined boundaries).

Government test	Base Proposal (whole districts, no modifications)	Modified Proposal (refined boundaries as set out in 5.25.3)
1. Single tier of local government	Creates five unitary authorities using existing principal authorities as building blocks. Meets the invitation’s requirement to set out a base case on whole districts and removes two-tier arrangements within each area.	Also creates five unitary authorities and removes two-tier arrangements. Uses ward and parish refinements to adjust footprints where justified so that the single-tier pattern better follows how people use services.
2. Right size and financial resilience	Produces units of uneven population size (for example, a single-district unit is smaller than a unit comprising several districts). The range in size may have implications for resilience and perceived local connection. The extent of risk pooling would depend on the size of each unit and on the delivery model adopted.	Places all five councils within an indicative band of about 300,000 to 400,000 residents. This is intended to avoid extremes of scale and to provide a more balanced platform for long-term resilience. Financial performance would still depend on delivery choices, but the starting sizes are more even.
3. High-quality and sustainable services	Establishes single tiers per area, which removes duplication of tiers. The degree of service integration and consistency would depend on local access, locality arrangements and phasing. Uneven population sizes may make collaboration and standardisation more variable across the county.	Aligns footprints more closely with travel-to-work and service corridors, so fewer hand-offs should be needed and prevention can be designed once and delivered locally. Any service changes would follow assessment, engagement and due process.

Government test	Base Proposal (whole districts, no modifications)	Modified Proposal (refined boundaries as set out in 5.25.3)
4. Local collaboration and responsiveness to views	Provides a legally coherent configuration based on administrative boundaries. It does not incorporate ward-level refinements or other adjustments arising from engagement. Transition would require formal collaboration mechanisms between the new councils.	Reflects engagement themes about recognisable councils, clearer accountability and neighbourhood voice by keeping principal settlements and parishes intact where possible. Councils of similar size are intended to collaborate as peers, with less risk of dominance.
5. Support for devolution	Creates a complete set of constituent councils across Sussex for a Mayoral Strategic Authority. Variation in unit size could affect perceived balance at the Mayoral table and may require compensating partnership arrangements.	Provides five partners of comparable size for the Mayor. This is intended to create a fair and stable platform for strategy, investment and performance without a single authority dominant.
6. Community engagement and neighbourhood empowerment	Interim electoral and governance arrangements would ordinarily be set in the Structural Changes Order. A full electoral review by the Local Government Boundary Commission would typically follow vesting to secure appropriate representation and neighbourhood governance in each new unitary.	Parishes and towns remain intact where possible. Neighbourhood charters and proportionate locality arrangements are anticipated so that local voice is visible, with initial warding settled through the Order and a full LGBCE review post-vesting.



Representative Councils for a Devolved Sussex: A Five Unitary Proposal

6. Proposed council profiles



Unitary A

Population: ~304,000

Boundary and geography

This authority would bring together the existing Brighton & Hove City Council with East Saltdean & Telscombe Cliffs, Peacehaven (East, West, North) and Falmer Parish. These areas already share schools, universities, hospitals and cultural anchors, with thousands of daily journeys along the A259, Coastway rail and Brighton Main Line. Including Falmer resolves an administrative anomaly: it is functionally part of the city’s service and transport system but currently sits outside the boundary.

Governance and representation

- Indicative councillors: c.59, based on county divisions scaled to 2–3 members each, subject to full LGBCE review after vesting.
- Leader and Cabinet governance model.
- Peacehaven Town, Telscombe Town and Falmer Parish Councils retained with their existing powers and precepts.
- Ward councillors continue, supported by a Neighbourhood Charter to guarantee consultation standards, response times and escalation routes.
- Legal neutrality: all proposals are subject to ministerial decision and statutory process.

Council tax and finance

- Band D harmonisation phased fairly; parish precepts remain local. The period and method for harmonisation are set in the Structural Changes Order. Recent

reorganisations have used multi-year glidepaths. We do not fix a number here; it would be confirmed in the Order.

- Resilience strengthened by pooling resources and cutting duplication across the coastal corridor.
- Potential to explore corporate platforms across all five councils (finance, HR/payroll, customer, cyber/data) support steady-state savings.
- Like all councils, this footprint will still face national pressures in adult social care, SEND and homelessness. The coherent footprint improves the ability to manage these pressures; it does not remove them.

Services (council-led)

- Children’s services rated Outstanding (Ofsted, 2024), with standards extended across the new footprint.
- Adult services stable but under rising demand; wider urban base improves resilience.

Education, housing, public health/prevention and local regeneration could be planned once across the corridor, reducing costly hand-offs (council-led).

Why this council works

Brighton, Hove, Peacehaven, Telscombe, East Saltdean and Falmer already operate as one urban coastal system. Residents share the same schools and colleges, universities,

hospitals, leisure and cultural facilities. Aligning local government with this lived reality delivers:

- Simpler services (council-led): one accountable authority instead of hand-offs across boundaries.
- Clearer local accountability: one website, one account and one main number.
- Identity protected: parish and town councils retained; neighbourhood plans for places that want them.
- Better strategic fit with the Mayor: a single coherent coastal council that can work with the Sussex Mayor on county-wide strategy for transport corridors, skills and investment. Local housing and regeneration remain council functions, aligned to Mayoral strategy where relevant.

At ~304,000 residents, the footprint sits within the 300–400k which we believe is large enough for professional depth

and financial resilience, yet small enough to remain connected to communities. Collectively, the five new councils provide Sussex-wide scale without creating a single remote authority.

What this means for residents

- Clarity: one council responsible for local services across the corridor, fewer points of confusion.
- Continuity: bins collected, care packages maintained, schools open, safeguarding in place.
- Identity protected: Peacehaven, Telscombe and Falmer remain distinct places, with parish and town councils unchanged.
- Fair council tax: harmonisation phased gradually and explained clearly.
- No change to addresses: residents still live in Peacehaven, Telscombe, Saltdean, Falmer, Brighton or Hove.

Government tests at a glance

Criterion	Assessment	Evidence
1. Single tier of local government	Meets	Creates a single unitary authority, removing two tiers along the corridor.
2. Right size and financial resilience	Meets	Approx. 304k residents within the 300–400k indicative band; balanced with the other four councils.
3. High-quality, sustainable services	Meets	A single council reduces hand-offs and duplication. Strong existing children’s services (Ofsted, 2024: Outstanding) and wider prevention can be planned once.
4. Local collaboration and responsiveness to views	Meets	Responds to engagement feedback on recognisable councils and accountability. Balanced peer alongside four others; able to collaborate with NHS trusts, universities and voluntary sector.
5. Support for devolution	Meets	Provides a coherent coastal partner for the Sussex Mayor on transport, skills and investment.
6. Community engagement and neighbourhood empowerment	Meets	Indicative councillor numbers 59 subject to LGBCE; Peacehaven, Telscombe and Falmer councils remain; neighbourhood charter anticipated to guarantee standards and visibility of local voice.

## Unitary B

Population: ~360,000

### Boundary and geography

This council would unite Eastbourne, Hastings and Rother with Seaford and Newhaven, plus nearby Wealden communities that functionally tie into Eastbourne (for example Polegate, Willingdon, Pevensey, Stone Cross). These places share daily travel and service use along the A259 and East Coastway rail corridor, with the Marshlink line extending east from Hastings to Ashford International.

### Governance and representation

- Indicative councillors: c.67, based on county divisions scaled to 2–3 members each, subject to SCO and full LGBCE review.
- Governance model: arrangements for the shadow period would be set in the Structural Changes Order. The enduring model (executive or committee) would be determined by the new council under the Local Government Act 2000 (as amended) after vesting.
- Town and parish councils (e.g., Seaford, Newhaven, Rye, Bexhill, Polegate, and rural parishes) would continue with their existing powers and precepts.
- Ward councillors would continue. Tools to strengthen neighbourhood voice (for example, local standards or charters) could be considered by the new council.
- Legal neutrality: all changes are subject to ministerial decision and statutory process.



### Council tax and finance

- Council tax would be phased to a single schedule in line with the method and period set in the Structural Changes Order (SCO); parish precepts would remain local.
- Financial resilience is intended to improved by pooling resources and reducing duplication across one coastal authority.
- Shared corporate platforms used across all five councils (finance, HR/payroll, customer, cyber/data) would support steady-state efficiencies, subject to each council's decisions.
- National pressures in adult social care, SEND and homelessness will continue. A coherent coastal footprint improves the ability to manage these pressures, it does not remove them.

### Services

- Health services are anchored by Eastbourne District General Hospital and Conquest Hospital (Hastings), which together can provide complementary acute and planned care for the corridor.
- Newhaven Port is a strategic maritime asset with the ferry link to Dieppe and growing clean-energy activity.
- Education, housing, public health/prevention and local regeneration could be planned once for the shoreline, reducing hand-offs between authorities and aligning delivery to lived geographies.

### Why this council works

The eastern shoreline already functions as a shared system:

- Eastbourne ↔ Polegate/Willingdon: daily commuting and service use.
- Hastings ↔ Rother: integrated labour and housing markets with linked regeneration priorities.
- Seaford & Newhaven: strong east–west ties along the A259 and rail, and a working harbour at Newhaven.

Common challenges: older-than-average age profiles, well-documented health inequalities (particularly in Hastings), constrained housing supply and A259 transport bottlenecks. These are easier to address when planned once across the shoreline and delivered locally.

This council would:

- Simplify local services: one accountable authority instead of multiple hand-offs.
- Clarify accountability: a single local decision-maker for the eastern coast; access routes could be simplified over time.
- Protect identity: towns and parishes remain; any further neighbourhood-voice arrangements would be for the new council to decide.
- Work better with the Mayor: provide a coherent coastal partner that can work with the Sussex Mayor on county-wide strategy for transport corridors and skills. Local housing, public health and regeneration would remain council responsibilities, aligned to Mayoral strategy where relevant.

### People and place

The area combines diverse coastal towns (Eastbourne, Hastings, Bexhill, Seaford, Newhaven), historic settlements (Rye, Battle) and growing commuter hubs (Polegate,

Willingdon). It includes both affluent rural communities and some of the South East's more deprived coastal wards. The coastline supports strong visitor economies but is also exposed to flood and climate risks. Nearby assets such as the South Downs and Seven Sisters draw visitors and require coordinated stewardship.

### Infrastructure and anchors

- Health: Eastbourne District General and Conquest Hospitals provide complementary acute and planned care for the corridor.
- Transport: The A259 and East Coastway rail connect Seaford, Newhaven, Eastbourne, Bexhill and Hastings; Polegate provides onward rail to London.
- Economy and culture: Newhaven Port; Eastbourne's conference and cultural offer (e.g., Towner Eastbourne); Hastings' heritage and creative economy; Bexhill's De La Warr Pavilion.
- Natural environment: South Downs National Park, Seven Sisters cliffs and Rye Harbour nature reserve underpin tourism and resilience planning.

### What this means for residents

- Clarity: one council responsible for local services across Eastbourne, Hastings, Rother, Seaford and Newhaven.
- Continuity: hospitals, schools and frontline services are intended to continue; safeguarding and local access points remain.
- Identity protected: Seaford, Newhaven, Bexhill, Rye and parishes remain with their names and civic institutions unchanged.
- Fair council tax: harmonisation phased in line with the SCO and explained clearly.
- Joined-up improvement: a single shoreline view for coastal renewal, flood planning, housing growth and public realm, delivered locally.

Government tests at a glance

Criterion	Assessment	Evidence
1. Single tier of local government	Meets	Creates one unitary across Eastbourne, Hastings, Rother, Seaford, Newhaven and part-Wealden; removes two tiers along the corridor.
2. Right size and financial resilience	Meets	~360k residents within the 300–400k band; balanced with the other four councils; avoids extremes of scale.
3. High-quality, sustainable services	Meets	One authority for the shared coastal system anchored by Eastbourne DGH and Conquest Hospital; reduces hand-offs and aligns services with lived geographies.
4. Local collaboration and responsiveness to views	Meets	Balanced peer alongside four others. Keeps Seaford and Newhaven with Eastbourne, reflecting engagement feedback. Well placed to collaborate with East Sussex Healthcare NHS Trust, Newhaven Port, FE/ HE and regeneration partnerships.
5. Support for devolution	Meets	Provides a coherent eastern coastal partner that can work with the Sussex Mayor on strategic transport, skills and investment.
6. Community engagement and neighbourhood empowerment	Meets	Indicative ~67 councillors, subject to LGBCE review post-vesting. Town and parish councils (e.g. Seaford, Newhaven, Rye, Bexhill, Polegate, rural parishes) remain. Neighbourhood charters or other tools anticipated to guarantee standards of engagement.

Unitary C

Population: ~323,000

Boundary and geography

This authority would bring together Mid Sussex (Burgess Hill, Haywards Heath, East Grinstead and surrounding villages), the Lewes town and hinterland (for example Lewes, Ringmer, Chailey, Newick, Ditchling, Wivelsfield, Plumpton) and northern and central Wealden towns and parishes (for example Uckfield, Crowborough, Forest Row, Maresfield, Buxted, Danehill & Fletching, Heathfield, Hailsham). These places already align along north–south rail and road corridors serving London, Gatwick and Brighton.

Governance and representation

- Indicative councillors: c.55, based on county divisions scaled to 2–3 members each, subject to SCO and full LGBCE review after vesting.
- Governance model: arrangements for the shadow period would be set in the Structural Change Order. The enduring model (executive or committee) would be determined by the new council under the Local Government Act 2000 (as amended) after vesting.
- Town and parish councils remain with their existing powers and precepts.
- Ward councillors would continue; additional neighbourhood-voice tools (for example, local standards or charters) could be considered by the new council.
- Legal neutrality: all changes are subject to ministerial decision and statutory process.



Council tax and finance

- Council tax would be phased to a single schedule in line with the method and period set in the Structural Changes Order; parish precepts remain local.
- Financial resilience is intended to be improved by pooling resources and reducing duplication within one inland authority.
- Shared corporate platforms across all five councils (finance, HR/payroll, customer, cyber/data) would support efficiencies, subject to each council’s decisions.
- National pressures in adult social care, SEND and homelessness will continue. A coherent north–south footprint improves the ability to manage these pressures, it does not remove them.

Services (council-led)

- Health: anchored by the Princess Royal Hospital (Haywards Heath) and the specialist Queen Victoria Hospital (East Grinstead), alongside strong primary/ community networks.
- Education & skills: secondary and FE provision across Mid Sussex and the Lewes area; Plumpton College supports land-based and green skills.



- Local delivery: education, housing, prevention and regeneration could be planned once across the footprint, reducing hand-offs and aligning to lived geographies.

Why this council works

Daily life in Unitary C is structured along north–south corridors:

- Places: Lewes is the cultural centre for its hinterland; Uckfield, Crowborough, Hailsham and Heathfield look both north and south for work and learning; Burgess Hill and Haywards Heath are strategic growth and service hubs.
- Rail: the Brighton Main Line/Thameslink through Burgess Hill and Haywards Heath connects to London and Gatwick; the East Grinstead and Uckfield lines serve commuters north, with interchange links to Brighton and the wider Sussex network.
- Road: the A23/M23, A22 and A272 carry flows between towns, villages and employment hubs.

The footprint combines growing commuter towns with rural parishes and nationally significant landscapes (South Downs, High Weald, Ashdown Forest). Shared challenges like housing affordability, rural access, transport capacity and environmental stewardship are better addressed when planned once across the footprint and delivered locally.

This council would:

- Simplify local services (council-led): one accountable authority instead of multiple hand-offs.
- Clarify accountability: a single local decision-maker for the area; access routes could be simplified over time.
- Protect identity: towns and parishes remain distinct; further neighbourhood-

voice arrangements would be for the new council to decide.

- Work better with the Mayor: provide a coherent inland partner that can work with the Sussex Mayor on county-wide strategy for transport corridors and skills. Local housing, public health and regeneration would remain council responsibilities, aligned with Mayoral strategy where relevant.

People and place

- Communities: commuter families in Mid Sussex towns; older residents in villages and rural areas. Need is often dispersed and less visible, making prevention and rural access central to planning.
- Access: residents rely on town-anchored hubs (Lewes, Uckfield, Crowborough, East Grinstead, Haywards Heath, Burgess Hill) for schools, GPs, shopping and leisure; priorities include reliable bus services, station access and digital connectivity.
- Economy: Burgess Hill and Haywards Heath support knowledge-intensive clusters; East Grinstead hosts specialist clinical services; Plumpton College anchors land-based and green skills; town-centre renewal opportunities across Lewes, Uckfield, Burgess Hill, East Grinstead and Crowborough.
- Environment: the South Downs, High Weald and Ashdown Forest shape growth and transport decisions. Stewardship of these landscapes is part of the council’s place identity.

Infrastructure and anchors

- Health: Princess Royal Hospital (Haywards Heath); Queen Victoria Hospital (East Grinstead); strong community health networks.
- Transport: Brighton Main Line/Thameslink; East Grinstead and Uckfield lines to London; A23/M23; A22; A272.

- Education & skills: Plumpton College; FE and secondary networks across Mid Sussex, Lewes and northern Wealden.
- Economy: Burgess Hill Northern Arc and Science Park; Haywards Heath health/ knowledge clusters; East Grinstead clinical specialism; Lewes town renewal.
- Continuity: bins, schools, GP services and safeguarding continue.
- Identity protected: towns and parishes keep their names and civic bodies.
- Fair council tax: harmonisation set by the SCO, phased and explained clearly.
- Joined-up improvement: one view of north–south transport, rural access, housing and skills planned once and delivered locally.

What this means for residents

- Clarity: one council responsible for local services across Mid Sussex, Lewes town and villages, Uckfield, Crowborough, Hailsham and surrounding parishes.

Government tests at a glance

Criterion	Assessment	Evidence
1. Single tier of local government	Meets	Creates one unitary across Mid Sussex, Lewes town and hinterland, and northern/central Wealden; removes two tiers.
2. Right size and financial resilience	Meets	~323k residents within the 300–400k band; balanced with the other four councils; avoids extremes of size.
3. High-quality, sustainable services	Meets	One inland unitary aligned to commuter flows and rural patterns; anchored by Princess Royal and Queen Victoria hospitals; intended to reduce hand-offs and align prevention with lived geographies.
4. Local collaboration and responsiveness to views	Meets	A peer of comparable size to others; keeps Lewes town with its rural hinterland, reflecting engagement feedback. Supports collaboration with NHS trusts, Plumpton College, FE/HE, and rural networks along north–south spines.
5. Support for devolution	Meets	Provides a coherent inland partner for the Sussex Mayor on north–south transport corridors, skills and rural sustainability.
6. Community engagement and neighbourhood empowerment	Meets	Indicative ~55 councillors, subject to LGBCE review post-vesting. Town and parish councils remain. A rural-focused neighbourhood charter anticipated to formalise engagement standards; new authority could also consider tools such as locality budgets or resident panels.

Unitary D

Population: ~394,000

Boundary and geography

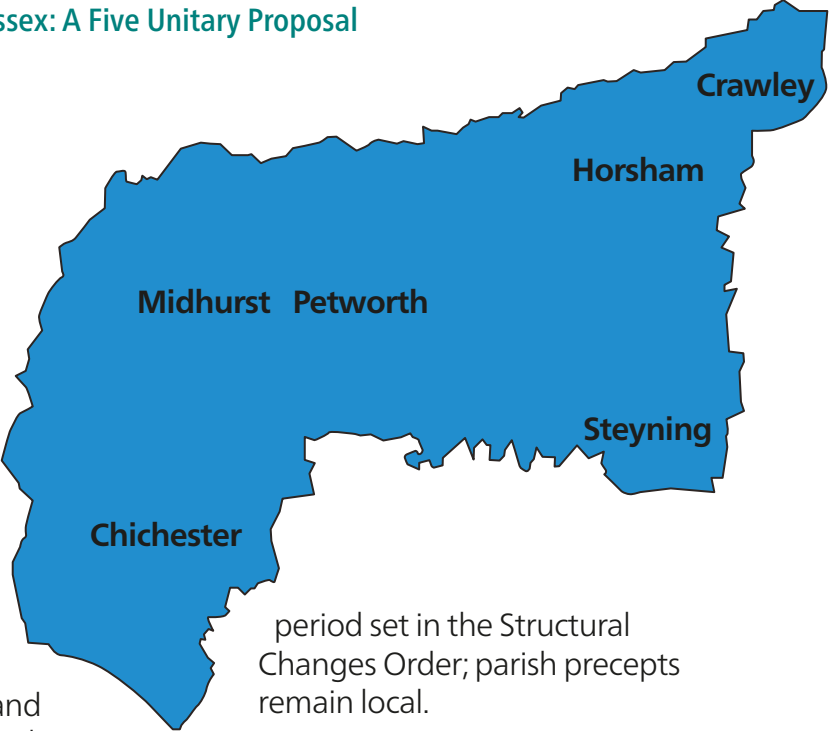
This authority would bring together Crawley, Horsham and Chichester districts. The area runs from the international gateway around Gatwick and Three Bridges in Crawley, through the market town of Horsham, to the cathedral city of Chichester and its South Downs and coastal plain. Daily life and services are tied together by the A23/M23 and A24 corridors, the A27 across Chichester, and rail links via Gatwick/Three Bridges, Horsham and Barnham.

Governance and representation

- Indicative councillors: c.62, based on county divisions scaled to 2–3 members each, subject to the SCO and full LGBCE review after vesting.
- Governance model: arrangements for the shadow period would be set in the Structural Changes Order. The enduring model (executive or committee) would be determined by the new council under the Local Government Act 2000 (as amended) after vesting.
- Town and parish councils remain with their existing powers and precepts.
- Ward councillors continue and additional neighbourhood-voice tools may be considered by the new council.
- All changes are subject to ministerial decision and statutory process.

Council tax and finance

- Council tax would be phased to a single schedule in line with the method and



- Financial resilience is intended to be improved by pooling resources and reducing duplication across Crawley, Horsham and Chichester.
- Shared corporate platforms across all five Sussex councils (finance, HR/payroll, customer, cyber/data) would support efficiencies, subject to each council's decisions.
- National pressures in adult social care, SEND and homelessness will continue. A coherent North Sussex footprint improves the ability to manage these pressures, it does not remove them.

Services

- Health: acute services anchored by St Richard's Hospital (Chichester); Crawley Hospital and Horsham Hospital provide urgent treatment and community care, with established referral routes to neighbouring acute providers.
- Education & skills: strong secondary/FE provision across Crawley, Horsham and Chichester; the University of Chichester anchors higher education and training.
- Local delivery: education, housing, prevention and regeneration could be planned once across the area, reducing hand-offs and aligning to lived geographies.

Why this council works

Authority D combines:

- Gateway strength: Gatwick Airport and Manor Royal in Crawley anchor jobs and national connectivity.
- Market town vitality: Horsham provides services and identity for a wide rural hinterland.
- City heritage: Chichester blends cathedral, culture and a thriving visitor economy.
- Shared assets and challenges (from the A23/M23 Gatwick corridor, to growth pressure in Horsham, to managing the South Downs and Chichester Harbour AONB) benefit from one council planning once.

This council would:

- Simplify local services (council-led): one accountable authority instead of multiple hand-offs.
- Clarify accountability: one decision-maker for the area; access routes could be simplified over time.
- Protect identity: Crawley, Horsham and Chichester retain their councils and names; parishes remain intact.
- Work better with the Mayor: provide a coherent inland-gateway partner that can work with the Sussex Mayor on county-wide strategy for the Gatwick economy and A23/A27 corridors. Local housing, health prevention and regeneration would remain council responsibilities, aligned with Mayoral strategy where relevant.

People and place

- Communities: a young and diverse workforce in Crawley; older populations in Horsham and Chichester towns and villages.
- Access: residents use town hubs for schools, GPs, retail and services; key

interchanges include Gatwick, Three Bridges, Horsham and Chichester stations.

- Economy: aviation/logistics and advanced engineering (Crawley/Manor Royal); services and professional sectors (Horsham); cultural, education and visitor economy (Chichester, Goodwood, Chichester Festival Theatre).
- Environment: the South Downs National Park and Chichester Harbour AONB frame growth, housing and transport decisions; stewardship of these landscapes is part of place identity.

Infrastructure and anchors

- Health: St Richard's Hospital (Chichester); Crawley and Horsham hospitals for urgent/community care.
- Transport: A23/M23, A24, A27; rail via Gatwick/Three Bridges to London; Arun Valley line through Horsham to Barnham for Chichester access.
- Education & skills: University of Chichester; FE/secondary networks across Crawley, Horsham and Chichester.
- Economy: Gatwick Airport; Manor Royal business district; Goodwood; Chichester Festival Theatre; horticulture and viticulture on the coastal plain.

What this means for residents

- Clarity: one council responsible for local services across Crawley, Horsham and Chichester.
- Continuity: bins, schools, GP/community health and safeguarding continue.
- Identity protected: towns, city and parishes retain their names and civic bodies.
- Fair council tax: harmonisation set by the SCO, phased and explained clearly.
- Joined-up improvement: one view for Gatwick/Manor Royal, the A23/A24/A27 corridors, housing and place-making. Planned once, delivered locally.

Government tests at a glance

Criterion	Assessment	Evidence
1. Single tier of local government	Meets	Creates one authority covering Crawley, Horsham and Chichester; removes two tiers in those areas.
2. Right size and financial resilience	Meets	~394k residents, at the upper end of the 300–400k indicative band, balanced against the other four councils.
3. High-quality, sustainable services	Meets	One council linking gateway, towns and rural areas; anchored by St Richard’s, Crawley and Horsham hospitals; intended to reduce hand-offs and align services to lived geographies.
4. Local collaboration and responsiveness to views	Meets	Balanced peer alongside four others. Responds to engagement on recognisable councils. Well placed to collaborate with Gatwick Airport, NHS providers, University of Chichester, employers, and environmental partnerships (South Downs NP, Harbour AONB).
5. Support for devolution	Meets	Provides a coherent inland-gateway partner for the Sussex Mayor on Gatwick, skills and transport corridors.
6. Community engagement and neighbourhood empowerment	Meets	Indicative ~62 councillors, subject to LGBCE review post-vesting. Parishes and towns remain. Neighbourhood charters could formalise standards, with tailored engagement for unparished areas such as Crawley.

Unitary E

Population: ~343,000

Boundary and geography

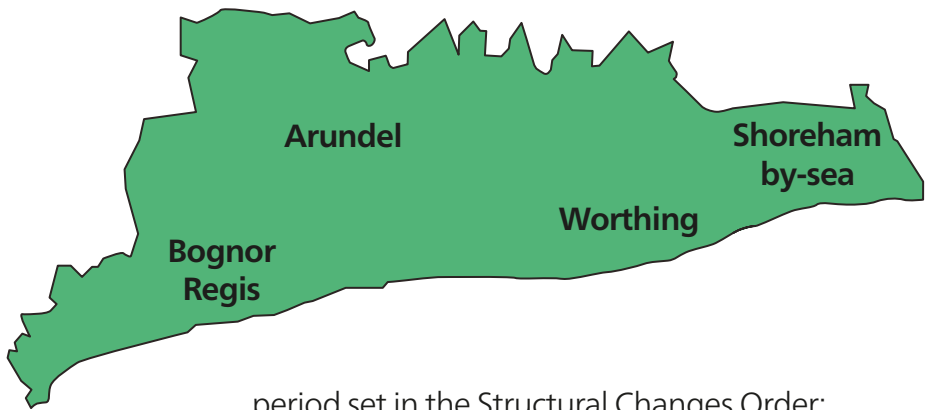
This authority would bring together the three coastal authorities of Arun, Adur and Worthing. It runs from Bognor Regis and Littlehampton in Arun, through Worthing, to Shoreham-by-Sea, Lancing and Southwick in Adur. The coastline is connected by the A259 and West Coastway rail, with the A27 providing the main east–west trunk route and interchanges north via the A24/A283.

Governance and representation

- Indicative councillors: c.54, based on county divisions scaled to 2–3 members each, subject to the SCO and full LGBCE review after vesting.
- Governance model: arrangements for the shadow period would be set in the Structural Change Order. The enduring model (executive or committee) would be determined by the new council under the Local Government Act 2000 (as amended) after vesting.
- Town and parish councils remain with their existing powers and precepts.
- Ward councillors continue; additional neighbourhood-voice tools could be considered by the new council.
- All changes are subject to ministerial decision and statutory process.

Council tax and finance

- Council tax would be phased to a single schedule in line with the method and



period set in the Structural Changes Order; parish precepts remain local.

- Financial resilience is intended to be improved by pooling resources and reducing duplication across one shoreline authority.
- Shared corporate platforms across all five councils (finance, HR/payroll, customer, cyber/data) would support efficiencies, subject to each council’s decisions.
- National pressures in adult social care, SEND and homelessness will continue. A coherent coastal footprint improves the ability to manage these pressures, it does not remove them.

Services

- Health: acute care anchored by Worthing Hospital (University Hospitals Sussex). Community and planned care delivered through Bognor Regis War Memorial Hospital and local primary/community hubs.
- Economy & regeneration: Shoreham Port (trust port) and Littlehampton Harbour are strategic maritime assets; Bognor Regis is a major visitor destination; Worthing and Shoreham town centres anchor retail, culture and services.
- Local delivery: education, housing, prevention and regeneration could be planned once for the coastal strip, reducing hand-offs between councils.



Why this council works

This footprint reflects how the West Sussex shoreline already functions:

- A single seafront system: towns share shoreline infrastructure, sea defences and flood risk management needs.
- Connected places: the A259 and West Coastway rail link Bognor Regis–Littlehampton–Worthing–Lancing–Shoreham; the A27 provides the trunk route east–west.
- Shared economies: coastal tourism (Bognor Regis, Littlehampton, Worthing), marine and port activity (Shoreham Port, Littlehampton Harbour), horticulture on the coastal plain, and growing creative and digital sectors in Worthing and Shoreham.

One shoreline council means:

- Simpler local services (council-led): one accountable authority instead of multiple hand-offs.
- Clearer accountability: one local decision-maker; access routes could be simplified over time.
- Identity protected: towns and parishes remain distinct; additional neighbourhood-voice tools would be for the new council to decide.
- Better strategic fit with the Mayor: a coherent shoreline partner that can work with the Sussex Mayor on county-wide strategy for the A27/A259 corridors, skills and coastal resilience. Local housing, prevention and regeneration remain council responsibilities, aligned with Mayoral strategy where relevant.

People and place

- Communities: a mix of older-than-average populations in many neighbourhoods and younger families in growing coastal communities. Needs can be concentrated (town centres, seafront) or dispersed (village hinterlands).

- Access: residents rely on town hubs for schools, GPs, retail and leisure; priorities include reliable rail services, safer local roads and good station access (e.g. Shoreham-by-Sea, Lancing, Worthing, Littlehampton, Bognor Regis).
- Economy: tourism and hospitality (Bognor Regis resort, Littlehampton seafront), creative and digital businesses (Worthing/Adur), marine and port industries (Shoreham Port, Littlehampton Harbour), and horticulture/food on the coastal plain.
- Environment: the coastline faces tidal flood and climate risks; the South Downs National Park meets the urban fringe at places such as Findon, Angmering and Arundel; stewardship and access management are central to balancing growth, homes and green space.

Infrastructure and anchors

- Health: Worthing Hospital (acute); Bognor Regis War Memorial Hospital (community/urgent care).
- Transport: A27 and A259; West Coastway rail; Shoreham (Brighton City) Airport for general aviation.
- Economy & culture: Shoreham Port; Littlehampton Harbour; Butlin’s Bognor Regis; Arundel Castle (heritage); Worthing Museum & Theatres; Shoreham’s Creative Mile and seafront cultural assets.
- Environment: coastal-flood schemes (e.g., Adur tidal walls), shoreline management plans, and links to the South Downs National Park.

What this means for residents

- Clarity: one council responsible for local services across Arun, Adur and Worthing.
- Continuity: on day one bins, schools, GP/ community health and safeguarding continue.
- Identity protected: towns and parishes keep their names and civic bodies.

- Fair council tax: harmonisation set by the SCO, phased and explained clearly.
- Joined-up improvement: one view for seafront renewal, flood management, housing growth and public realm (planned once, delivered locally.)

Government tests at a glance

Criterion	Assessment	Evidence
1. Single tier of local government	Meets	Creates one shoreline authority covering Arun, Adur and Worthing; removes two tiers in those areas.
2. Right size and financial resilience	Meets	~343k residents within the 300–400k indicative band; balanced with the other four councils.
3. High-quality, sustainable services	Meets	One shoreline authority for health, housing and coastal resilience; anchored by Worthing Hospital and Bognor Regis War Memorial Hospital; intended to reduce hand-offs and align services.
4. Local collaboration and responsiveness to views	Meets	A peer of comparable size to the other four councils. Reflects engagement by keeping coastal towns together. Supports collaboration with University Hospitals Sussex, Shoreham Port, South Downs NP, visitor economy networks and FE/HE providers.
5. Support for devolution	Meets	Provides a coherent shoreline partner for the Sussex Mayor on A27/A259 corridors, skills, housing growth and coastal resilience.
6. Community engagement and neighbourhood empowerment	Meets	Indicative ~54 councillors, subject to LGBCE review post-vesting. Town and parish councils remain where they exist across Arun. Unparished areas like Worthing and parts of Adur could be covered by tailored arrangements. A coastal neighbourhood charter anticipated to set standards for engagement, subject to decisions of the new authority.

# 7. Comparison with other proposals for Sussex

The Government asked each invitation area to put forward an evidence-led proposal that meets the six statutory tests. Refined boundaries may be included where justified. Ministers will then test proposals they assess as meeting the criteria side by side through statutory consultation before any decision.

East and West Sussex developed their cases to the same timetable as us. They could not fully appraise our refined five-council proposal at that stage. This section places the approaches next to each other, using the Government’s six tests. The purpose is to show how different interpretations of the tests have been brought forward for Ministers and residents to compare.

All three approaches, a single East Sussex authority, the single and two unitary models for West Sussex, and our proposal for five balanced councils, are valid interpretations of the Government’s six statutory tests. Each has strengths and trade offs. The statutory Sussex wide consultation is the proper stage for Ministers, residents and partners to weigh those options side by side.

## Why the footprints differ

East and West Sussex were asked to work within their invitation areas. Their cases therefore tested county-wide and two-unitary models but did not cross county lines. Our proposal takes a whole-Sussex view, as MHCLG’s invitation allowed. Our ask to Government is that these options are now consulted on side by side across the whole Sussex region, subject to the Secretary of State’s decision.

## Transition and deliverability

We recognise that a five council model involves greater transition complexity than a single county unitary. West Sussex in particular has emphasised the simplicity of a continuing authority model. Our view is that this is a once in a generation reform that is expected to shape local government for 30 to 40 years. The short term costs and programme risks of transition are recognised and have been modelled in our financial case. They can, in principle, be funded safely through reserves, capital receipts and, subject to Government decision, time limited capacity support. Over the long term, we judge that the benefits of balanced structures where no council is fragile, no council is excessively large, and none dominates the Mayoral table outweigh the short term disruption of transition.

## Residents’ safeguards made real

Engagement across our footprint was sceptical about structural reform but clear on the safeguards people would want if change proceeds. Residents asked for councils they can recognise, for parish and neighbourhood voice to be protected, and for clarity about who does what. These conditions are embedded in our proposal. Every council is designed to sit within the 300,000 to 400,000 range so that it feels recognisable. Parishes would remain with their existing powers and precepts. New authorities would be expected to consider neighbourhood charters, subject to local decision, to formalise engagement standards. Each council would provide a single accountable route for local services, removing confusion between district and county responsibilities, while day to day services and safeguarding continue under the Structural Changes Order on vesting.

## Short term and long term trade offs

In the short term, East and West Sussex single county models offer simplicity, stronger headline pooling and quicker payback, with lower transition risk. In the long term, five balanced councils avoid extremes of size, keep councils recognisable, enable peer to peer collaboration and create a Mayoral table where no single authority is dominant.



How the approaches interpret the six Government tests

MHCLG test / Feature	East Sussex: “One East Sussex” (single county unitary ~555,000)	West Sussex: Option A – single county unitary (~891,000)	West Sussex: Options B1/B2 – two unitaries (~400–500,000 each)	Sussex: Five balanced councils (~300–400,000 each)
Geography and constituent areas	One unitary covering the current East Sussex county area: Eastbourne, Hastings, Rother, Wealden and Lewes. Brighton & Hove remains a separate unitary.	One unitary covering the current West Sussex county area: Adur, Arun, Chichester, Crawley, Horsham, Mid Sussex and Worthing.	B1: Arun, Chichester and Worthing in one council; Adur, Crawley, Horsham and Mid Sussex in another. B2: Adur, Arun, Chichester and Worthing in one council; Crawley, Horsham and Mid Sussex in another.	A: Brighton & Hove with Peacehaven, Telscombe, East Saltdean and Falmer. B: Eastbourne, Hastings and Rother with Seaford, Newhaven, and south Wealden communities (Polegate, Willingdon, Pevensey). C: Mid Sussex with Lewes town and hinterland and northern/central Wealden towns (Uckfield, Crowborough, Hailsham, Heathfield). D: Crawley, Horsham and Chichester. E: Arun, Adur and Worthing.
1. Single tier of local government	Creates one county-wide unitary, removing the two-tier system. Minimal disaggregation inside East Sussex means simpler transition.	Creates one county-wide unitary, removing the two-tier system. County services transfer intact with no disaggregation required.	Creates two authorities of about 400–500,000 residents. Delivery would involve disaggregation of county services and new interfaces between the two.	Creates five unitaries across Sussex, each replacing two-tier structures in their area. Boundaries refined to follow lived geographies, with transition phased to manage disaggregation safely.
2. Right size and financial resilience	Resilience through scale at about 555,000 residents. Their case argues a single large authority reduces fragility and pools risk.	Maximum pooling at about 891,000 residents. Their business case identifies the strongest savings and quickest payback, with a modelled net benefit of £48.8m per year and 2.3-year payback. Figures are based on West Sussex’s own methodology.	Two councils of about 400–500,000 residents. Their case shows lower savings, with a modelled net benefit of £18.8m per year and 6.4-year payback, but sizes are closer to Government’s right-size guidance. Figures are based on West Sussex’s own methodology.	Five councils all within the 300,000 to 400,000 band, avoiding extremes of fragility or remoteness. Our modelling, using only publicly available RA data and Pixel forecasts, shows structural shortfalls comparable to three- and four-unitary comparators and therefore viable. Net recurring benefits rise to about £52m per year at steady state. These take longer to release than in larger models but are sustainable with guardrails on reserves and capital receipts. One-off costs are higher but affordable with phasing and, subject to Government decision, time-limited capacity support. Full methodology is set out in Section 9 (Finance and Resilience).
3. High-quality and sustainable services	Simplifies service delivery within county lines, reducing hand-offs. Their case notes reorganisation alone will not resolve national pressures in adult social care, SEND and homelessness.	Simplest to deliver, as existing county services move intact. Fewest transition risks in the short term.	Service delivery would involve creating two new authorities. More interfaces initially, with greater transition complexity to manage.	Services planned once along lived corridors such as the Coastway, north–south rail spines and rural systems. This reduces cross-boundary hand-offs over time. Day-one continuity is the guiding principle: bins, schools and safeguarding continue on vesting. Collaboration with NHS partners is supported, though footprints may evolve.
4. Local collaboration and responsiveness to views	County-wide engagement and collaboration by the six councils is cited. Their case argues that identity can still be protected within a single large unit.	Presented jointly by West Sussex councils. Engagement undertaken, though preferences were divided between single and two-unitary options.	Public and stakeholder survey of 9,332 responses. 62 per cent preferred a two-unitary model. Of these, 62 per cent favoured B2 (southwest/northeast split) and 28 per cent B1 (west/east split).	Responds directly to engagement in our footprint, where residents asked for recognisable councils, clear accountability and neighbourhood voice. Five councils of similar size support equal collaboration as peers. We invite statutory consultation so residents across Sussex can compare options on a like-for-like basis.
5. Support for devolution	Provides one clear county partner for the Sussex Mayor, simplifying relationships.	Provides one partner representing about 52 per cent of the Strategic Authority population. This offers clarity but risks imbalance at the Mayoral table.	Provides two partners at about 25 per cent each, giving a more balanced representation than a single 52 per cent authority.	Provides five partners in the 300,000 to 400,000 range. No council is dominant, creating a fair and stable Mayoral table across Sussex. .
6. Community engagement and neighbourhood empowerment	Proposes locality and neighbourhood mechanisms within a single large authority to address remoteness.	Intends formalised locality arrangements to preserve neighbourhood voice. Detail to be developed during transition.	As above, with locality working designed across two authorities.	Local voice designed in by scale, with each council recognisable to residents. Parishes and towns remain where they exist. New authorities would be expected to consider neighbourhood charters, subject to local decision, to formalise engagement standards. Visible access would be maintained through existing hubs such as libraries, leisure and family centres, complemented by digital routes. Electoral arrangements would be confirmed through the Structural Changes Order and reviewed by the Local Government Boundary Commission post-vesting.

# 8. Engagement: what we heard and how it shaped this footprint

We ran two rounds of non-statutory engagement to understand what matters most to people and partners and to build safeguards into any change.

## Scope and method

Our engagement focused on Brighton & Hove’s potential future footprint. One council cannot legitimately consult the whole of Sussex on all options; that is the Secretary of State’s statutory role. If Ministers proceed with this proposal, MHCLG will run a Sussex-wide consultation so all options are tested side-by-side across the whole affected area.

**Round 1 (April 2025):** open views on principles and priorities. Over 600 people responded.

**Round 2 (July–Aug 2025):** tested four eastward options; included a public meeting and border drop-ins for in-person questions. 2,307 people responded.

Our approach was: open, self-selecting online survey with optional questions; equalities monitoring included. We also held a public meeting and drop in events.

Open participation means responses are self-selected and not statistically representative. Results provide directional insight rather than a mandate.

Data assurance. 2,307 survey responses (2,283 online and 24 paper) were analysed independently by Ignite Consulting using documented quantitative and qualitative methods. All responses were included; optional questions retained; free-text coded line by line with cross-checks. Known

limitations: open participation, optional items, and partial coding of one free-text question are disclosed. This makes the dataset directional rather than statistically representative.

## Who responded

Total responses: 2,307.

Relationship to BHCC: 31% BHCC residents; 58% non-residents; 6% staff/partners/business/VCSE; 5% other/blank.

Coverage: significant participation from communities east of the city; many comments addressed wider Sussex impacts.

## Headline message

Respondents were sceptical of structural reform and many preferred no change. Within that, seven consistent concerns emerged. We treat these as conditions to be met if reorganisation proceeds.

## What people told us – the seven concerns

1. Identity and representation: fear of being subsumed by a larger urban authority; strong parish and village attachment; concerns about dilution of heritage and local political identity.

2. Trust and governance: doubts about BHCC’s record; calls for competent local delivery; perception that engagement felt rushed or biased; demand for transparency and meaningful involvement.

3. Services and infrastructure: worries about continuity in waste, SEND, and adult care; concern about congestion on the A259 corridor; scepticism that a larger authority could remain close and effective.

4. Boundaries and alternatives: suspicion of arbitrary or political maps; calls for clearer rationale; suggestions for coastal, pan-Sussex, or westward alternatives.

5. Finance: anxiety about debt inheritance, council tax harmonisation, and fair distribution of resources; desire for financial transparency.

6. Vulnerable groups: concern that children with SEND, families, and adults needing care could be disrupted during transition.

7. Process and transparency: confusion about whether people could remain with existing councils; calls for clearer information about what reorganisation can and cannot achieve.
- These concerns align with what other areas have found: widespread scepticism of structural reform, combined with clear conditions residents expect to see if change happens.

How we responded

You said	We did
Keep councils at a scale people recognise and minimise disruption	Proposed the smallest coherent footprint for Unitary A, and proposed 5 unitaries of a size of 300-400k residents, to reflect lived geographies.
Protect parish and neighbourhood voice	Parishes retain their powers and precepts. As new authorities, they would be expected to review and strengthen their relationships with Town and Parishes. Parish and town councils would continue as separate legal bodies and set their own precepts. Subject to member decisions and statutory processes, the new unitaries could bring forward a draft Parish & Communities Charter for consultation. They may also explore options for devolving defined local assets and services where there is local appetite, capacity and a sound business case.
Safeguard vulnerable groups and keep services local	A Day1 Service Continuity Plan is intended to maintain existing SEND, education and adult care pathways; all current access points will remain open; and no changes to eligibility thresholds would be proposed without an impact assessment and engagement.
Make it easier to know who does what	New unitaries would deliver all local services. The Sussex Mayor and Strategic Authority would cover only county-wide strategy.
Be transparent about debt and council tax	We propose working with MHCLG to explore ring-fencing of legacy debts through the Structural Changes Order; phased council tax harmonisation with damping; and independent assurance of the Medium-Term Financial Strategy.
Address A259 congestion	Align transition with a coastal corridor transport programme, subject to funding and devolved powers.
Justify which areas are included or excluded	Falmer included due to clear city ties; Kingston and the wider Downland excluded as rural in service profile with limited benefit.

What happens next

We are transparent about the limits of our remit. Our role has been to surface local concerns and embed safeguards. We now invite MHCLG to test all Sussex proposals side by side through the statutory consultation, so residents and partners across the whole area can compare options on a like-for-like basis.

9. Finance and resilience

This section explains the financial case for change. Its purpose is to show that the five proposed authorities would each be viable and sustainable, that the programme of reorganisation is affordable to deliver, and that the new structure would be resilient in the face of national pressures such as rising demand for adult social care, SEND, and temporary accommodation. It also sets out how we have applied a single neutral method across all options so that results can be compared fairly, and how one-off costs are intended to be funded safely through guardrails on reserves, capital receipts, and, subject to Government decision, time-limited capacity support.

**Purpose and principles**

The first test for reorganisation is whether each new unitary is financially sustainable, the programme is affordable to deliver, and the structure is resilient in the face of the national pressures every council faces.

Financial returns for 2025/26 show that authorities across Sussex are planning to make £48m appropriations from reserves (excluding school reserves) in the current financial year. This signals structural pressure before any reorganisation. Every council in Sussex is working to close further structural gaps in medium-term financial plans.

**Finance at a glance**

**On day one, services are intended to continue without disruption, with safeguarding and care pathways protected under the SCO.**

**Council tax would be harmonised to a single schedule, subject to the SCO, typically phased over a multi-year glidepath. Parish precepts remain local.**

**Reserves would be protected. The funding plan has guardrails which mean minimum balances will be maintained and statutory services will not be cut to fund change.**

**Eligible capital receipts could be used for qualifying transformation costs. We will also request time-limited Government capacity support to shorten dual running and accelerate savings.**

**Recurring savings are modelled to build steadily to a sustainable steady state. Three or four unitaries model higher early returns; five delivers more balanced scale and identity with sustainable long-term resilience.**



Our baseline therefore models pressures first, then applies transformation effects, and does not assume any benefit from the Fair Funding Review. Any positive outcome from funding reform would be treated as upside and not assumed in the base case.

Reorganisation cannot remove national pressures in adult social care, SEND and homelessness. What it can do is create a stronger structure to manage them, with fewer hand-offs, reduced duplication, clearer accountability, and more consistent prevention and early help.

Method and scope

A single neutral assumption set has been applied across all options, whether three, four or five unitaries. The approach has three steps.

Financial modelling has been undertaken for the whole of Sussex, for the proposed option and comparator options.

Three stages of financial modelling have been adopted to transparently delineate between separate elements of costs and benefits. The aim of this approach is to focus not just on the aggregate savings for all authorities in scope for any

given option, but also acknowledge the sustainability of each component unitary, and therefore the region as a whole. Numerical figures throughout the section should be interpreted as relative indicators of resilience rather than precise forecasts.

While these steps do not seek to pre-empt The Fair Funding Review 2.0, we believe it is complementary to constructively inform this review.

The steps opposite have been combined into an MTFP model summarising the core structural position (from step 1), transformation and reorganisation benefits (from step 2) and implementation costs (from step 3).

Through an assumption that gaps between this structural position and phased costs/ benefits are met from usable reserves, modelling also indicates that any option is likely to see at least one unitary that will meet significant challenges in funding transformation delivery from reserves alone.

A full description of financial modelling methodology is in Appendix A, which sets out further detail and source data.

Step	Explanation	What it tells us
Step 1: financial sustainability baseline	<p>Disaggregating £3.56 billion FY25/26 revenue expenditure and related spending power (funding) across BHCC and the two tier areas of East Sussex and West Sussex, and reaggregating against proposed unitary geographies. It is based on publicly available RA data, which is highly comparable. However, it does attempt to include existing or medium-term cost pressures since the budget was set at the start of the financial year due to varying management accounting conventions in how these pressures are represented.</p> <p>Council tax harmonisation, base growth, population increases and inflation are also factored into future forecasts by financial year, for both service expenditure and relevant spending power elements. However, Pixel Financial Management data has been used to forecast key spending power changes into future financial years. Debt and reserves positions have also been analysed and disaggregated using consistent techniques.</p>	<p>A medium-term assessment of the structural revenue pressure on the individual proposed authorities, before transformation benefits and implementation costs are considered.</p> <p>This step is considered critical; demonstrating the financial pressure Sussex as a whole is likely to experience in the medium-term, with a high level assessment as to how equitably spread this financial pressure is likely to be across the region.</p>
Step 2: transformation and reorganisation benefits	<p>Forecast how the core financial benefits of LGR could be unlocked, and an indication of their scale/ profile. This includes removing duplication, creation of agile unitaries with lower unit costs, regional joint working and recurring disaggregation disbenefits.</p>	<p>Recurring benefits and disbenefits, for each proposed unitary for each financial year in the medium-term.</p> <p>This benefit profile can be assessed in addition to the financial sustainability baseline in step 1 above.</p>
Step 3: implementation costs	<p>Estimate the one-off costs of reorganisation and their likely profile.</p>	<p>This cost profile can be assessed in addition to the financial sustainability baseline in step 1 above, to give a sense of ROI.</p>

Financial sustainability baseline

The following table summarises the maximum forecast difference between revenue expenditure requirement and spending power at each of the proposed authorities in a single financial year up to end FY29/30.

Council tax harmonisation is included in these forecasts, but these figures are otherwise a reflection of how existing pressures are distributed (noting as per methodology section above, that any further pressures, and savings plan, specific to the existing authority are not included).

Note that maximum structural shortfalls could be occurring in different financial years for different proposed authorities.

Table 1: financial sustainability baseline summary for proposed five unitary option and comparators; deficits denoted in brackets, surpluses denoted by positive figures

Proposed unitary	Five unitary option		Three unitary comparator		Four unitary comparator	
	Maximum structural shortfall	As % of revenue expenditure	Maximum structural shortfall	As % of revenue expenditure	Maximum structural shortfall	As % of revenue expenditure
Unitary A	(£24.3m)	-3.3%	(£26.2m)	-3.7%	(£26.2m)	-3.7%
Unitary B	(£75.1m)	-9.1%	(£36.1m)	-3.0%	(£36.1m)	-3.0%
Unitary C	£79.4m	14.0%	N/A	N/A	N/A	N/A
Unitary D	(£19.0m)	-2.4%	N/A	N/A	£32.1m	4.0%
Unitary E	(£57.2m)	-7.4%	(£24.4m)	-1.2%	(£62.5m)	-5.9%

Four areas of transformation benefits were assessed and disaggregated, to apply these benefits to the financial sustainability baseline of each proposed unitary/ geography. These costs represent recurring/ structural benefits and disbenefits to the base budget.

Our modelling forecasts total annual net benefits (but excluding one-off costs) rising to £52.4M per annum in the proposed five unitary option. However, this full benefits realisation is modelled over a period of circa 10 years. For example, circa £14M per annum of this benefit is forecast to be released by FY29/30.

Table 2: breakdown of annualised net benefits increasing to £52.4M per annum across Sussex

Savings group	Savings sub-group	Total annual net benefits
Constitution and governance	Consolidated Members - basic allowance	£0.916m
Constitution and governance	Consolidated Members - SRAs	£0.934m
Constitution and governance	Elections	£0.299m
Transformation	Senior management	£4,788m
Transformation	Service duplication (staffing and running expenses)	£20,239m
Transformation	Agile unitaries	£26,002m
Joint working	Economies in services run collaboratively at scale	£9,014m
Disaggregation disbenefits	Recurring increase to base budget	(£9,787m)
		<b>£52,406m</b>

Comparative three unitary and four unitary models forecast total annual net benefits rising to £59.7M and £58.2M per annum respectively.

Building on Table 1, the sustainability of proposed authorities after transformation can be summarised as follows. Note that this post-transformation improvement also represents improving council tax revenues following harmonisation, which is reflected below:

Table 3: maximum structural challenge in a financial year, for each unitary in each option over a 10 year forecast period; deficits denoted in brackets, surpluses denoted by positive figures

Proposed unitary	Five unitary option		Three unitary comparator		Four unitary comparator	
	Maximum structural shortfall	As % of revenue expenditure	Maximum structural shortfall	As % of revenue expenditure	Maximum structural shortfall	As % of revenue expenditure
Unitary A	(£18.1m)	-2.4%	(£21.8m)	-3.0%	(£21.8m)	-3.0%
Unitary B	(£55.0m)	-6.5%	(£2.7m)	-0.2%	(£0.7m)	-0.1%
Unitary C	£104.0m	16.4%	N/A	N/A	N/A	N/A
Unitary D	£0.9m	0.1%	N/A	N/A	£61.8m	6.7%
Unitary E	(£41.6m)	-5.2%	£22.6m	1.1%	(£40.2m)	-3.7%

Implementation costs

Estimated one-off implementation costs are as follows. Figures are indicative ranges only, included for comparison between options.

Mitigations for more pressured units

Modelling indicates that some units, particularly B and E, could face tighter margins in early years. To mitigate this risk, the proposal includes:

- Guardrails on reserves, with no drawdown below risk-assessed minima.

- Shared corporate platforms across all five councils to reduce duplication of effort and deliver savings faster.
- Sequencing of transformation so higher-risk councils adopt changes later, once platforms are proven.
- Independent assurance of each authority’s Medium-Term Financial Strategy.

These targeted mitigations are designed to ensure that all five councils remain viable during transition and build resilience in steady state.

Table 4: total implementation costs; costs denoted in brackets

Cost group	Cost sub-group	Three unitary comparator		Four unitary comparator		Five unitary comparator	
		Lower range (£M)	Upper range (£M)	Lower range (£M)	Upper range (£M)	Lower range (£M)	Upper range (£M)
Transition	Shadow authorities	2.7	3.2	2.9	3.4	3.1	3.6
Transition	Election to shadow authorities	2.9	3.4	3.0	3.5	3.1	3.6
Transition	Programme delivery	13.7	16.1	18.6	21.9	25.3	29.7
Transition	Redundancy and pension strain	8.5	10.0	6.4	7.5	4.8	5.7
Transition	ICT consolidation	26.4	31.0	28.2	33.1	30.1	35.4
Transition	Branding, communications and engagement	1.6	1.9	2.4	2.8	3.4	4.1
Transition	Creation of new councils	3.6	4.3	4.4	5.2	5.3	6.3
Transition	Closedown of existing/ shadow councils	1.6	1.9	1.6	1.9	1.6	1.9
Transformation	Programme delivery	15.4	18.1	16.0	18.8	16.5	19.4
Transformation	Redundancy and pension strain	11.7	13.8	9.2	10.8	7.2	8.5
Transformation	ICT consolidation	15.4	18.1	30.2	35.5	59.2	69.6
All	Contingency	5.2	6.1	6.1	7.2	8.0	9.4
Total one-off implementation costs		108.7	127.9	128.9	151.6	167.7	197.2

Upper range estimates are included in the full financial model.

Note that when these total one-off costs are phased by financial year in which they are likely to be incurred, and combined with the summary in Table 2, it demonstrates that funding transformation from usable revenue reserves of circa £500M across Sussex would be a significant challenge. This represents circa 40% of usable reserves (excluding schools) would be required to fund transformation. Disaggregation of debt and reserves, currently assumed on a population basis relative to existing geographies, also suggests funding transformation will be even more challenging in coastal authorities.



# 10. Services and delivery

This section explains the intended service model for the modified five Unitary Proposal. It focuses on how local services would be organised if reorganisation proceeds, recognising that final decisions would be subject to the Structural Changes Order and local democratic choice.

## Local where it matters, scale where it helps

Each unitary would be responsible for the full range of local services: education and children’s care, adult social care, housing, planning, waste, public health and community safety. Bringing these together within one organisation is intended to reduce duplication and make it clearer to residents who is responsible.

At the same time, the principle is to keep service delivery rooted in communities. Front-line services work best when they stay close to the people who use them. Functions such as social work, early help, homelessness casework, SEND transport, and public health outreach are expected to remain locally based, with councils continuing to work directly with schools, GPs and community partners.

Other functions are better organised at scale, either across each council or, in some cases, jointly across more than one council. Commissioning, market management, specialist hubs, ICT and data platforms, workforce development and analytics could be delivered on shared platforms where this improves resilience and value. Any such arrangements would follow options appraisal and local decision.

## Continuity as the guiding principle

On vesting day, continuity is the guiding principle. Services are intended to continue under the SCO, with safeguarding and care pathways protected. Eligibility thresholds would not change without an impact assessment and engagement.

## Social care partnerships

- **Strategic with the NHS.** The five councils will work with NHS Sussex. Strategic issues such as discharge, reablement, urgent community response and winter planning could be coordinated through a Sussex forum with the Mayor and the ICB. Current discharge and safeguarding protocols will continue on vesting day.
- **Place-based integrated delivery.** Each council would aim to operate a single discharge and reablement pathway, agreed jointly with NHS providers. Integrated Community Teams would remain aligned to primary care networks and neighbourhoods. Where current team footprints follow districts, these would be respected during transition.
- **Market shaping and workforce.** The councils could prepare joint market position statements for sectors where the market is Sussex-wide, such as high-cost placements. They may consider common approaches to provider sustainability, fair cost of care evidence and provider failure protocols. Workforce plans would include shared recruitment pipelines and training for reablement, dementia and strength-based practice.

- **Safeguarding and assurance.** Adults’ and children’s safeguarding arrangements would remain legally constituted throughout transition, with statutory leadership and membership continuous. Inspection readiness would be maintained for CQC assurance of Care Act duties, Ofsted ILACS, and local area SEND inspections.

## Children’s services and education

- Strong practice already exists across Sussex. The new councils would draw on this and extend proven approaches across each footprint, while maintaining continuity for families and schools.
- Early help and social care. Neighbourhood-based teams would keep family support and child protection close to communities. Pathways would be harmonised gradually, subject to appraisal and consultation.
- Education and inclusion. Admissions, school place planning and attendance support would be coordinated at council level, with locality teams working with schools, trusts and special schools.
- SEND and transport. Policies and panels would be harmonised over time with schools and parents. Current travel arrangements are expected to continue for each academic year until any agreed changes are made.

## Adults’ services and independence

- Reablement and urgent community response. Councils would work with NHS

partners to reduce hand-offs and improve outcomes. Any new pathways would be jointly developed; existing arrangements continue on vesting day.

- Care markets and self-funders. Advice and brokerage would be strengthened so people can access support more easily. Market management would focus on stabilising home care capacity and supporting quality.

- Carers. Carers’ assessment and support would be available locally and joined up with voluntary and community services.

## Housing and homelessness

- Housing options. Each council would run an assessment pathway and severe-weather protocol, while local housing teams continue day-to-day work.
- Temporary accommodation. Placements would be coordinated to manage cost and improve standards, with an emphasis on prevention and rapid rehousing.
- Supported housing. Commissioning would be aligned with social care and public health to meet demand for extra care, supported living and move-on accommodation.

## Waste and environmental services

- Continuity. Collections, recycling centres and disposal contracts are intended to continue on vesting day.
- Harmonisation. In the first year, councils may review collection policies and consider

- adopting the strongest affordable model, following engagement and decision. The intention is to lift standards up, not average them down.
- Cross-border flows. Agreements for treatment facilities would remain in place; there would be no export of risk to neighbouring councils.

Public health

- Mandated services. Sexual health, substance misuse, NHS Health Checks and health protection would continue without interruption.
- Improvement and outreach. Each council would produce a Joint Strategic Needs Assessment and report outcomes by place so progress is visible locally. Outreach programmes would remain community-led and evidence-based.

Community safety and resilience

- Police and resilience partners. The new councils would act as Category 1 responders, aligned to Sussex Police and the Local Resilience Forum. Plans would be simplified but partner structures unchanged.
- Community safety. Violence reduction, anti-social behaviour and safeguarding priorities would be coordinated at council level and delivered locally with partners and voluntary organisations.

Libraries, culture and leisure

- Libraries, museums, arts and leisure services are central to community identity and wellbeing. Cultural programmes would reflect local identity in each council while benefiting from shared commissioning where that adds value.

Growth, planning and transport

- Local plans, spatial planning and transport strategies would be set at council level and aligned to the functional corridors described earlier. Residents would see one set of rules per council for planning applications, parking and permits, with neighbourhood input through parishes and community forums. Strategic transport and growth issues would be led by the Mayor, with delivery by councils that know their places.

Multi-council delivery candidates

Some activities offer better value and resilience when delivered once for more than one council. Candidates include:

- specialist fostering and adoption recruitment,
- complex adaptations,
- ICT and technology operations,
- shared data and analytics,
- joint procurement,
- market shaping, and
- workforce development.

These would proceed only where options appraisal shows benefit, with clear service agreements, performance standards and local accountability preserved.

11. Democracy & Local Voice

Change must not mean losing the places people call home. The new councils in our modified five Unitary Proposal would be designed to simplify services and strengthen resilience while keeping identity and accountability close to communities.

Continuity and identity

Residents would continue to elect ward councillors. Parish and town councils would remain in place with their existing powers and precepts. Local casework would still be handled by people who know the area.

Experience already shows that bringing councils together does not erase identity. Nearly three decades after Brighton and Hove became a single authority, Hove remains Hove with its own centre, seafront and civic organisations intact, and Rottingdean remains Rottingdean. In 2024, residents around Hove Station and Rottingdean voted decisively for neighbourhood plans that now form part of the statutory development plan. These votes are proof that local identity can be actively protected within larger councils.

Postal addresses and post towns would also remain unchanged. Residents would still live in their neighbourhoods, and those names would continue to appear on bills, GP records and deliveries.

Day-one arrangements

From vesting day, residents are intended to see continuity in the services they rely on. Waste would still be collected, care packages delivered, and local access points to services kept open. Ward representation would continue. Services that work best close to

communities, such as social work, early help, school relationships, homelessness casework and public health outreach, would remain rooted in place.

Councillor numbers and warding

For the first elections only, interim arrangements are required because the Local Government Boundary Commission for England (LGBCE) can conduct a full electoral review only after the new councils legally exist. The interim approach is designed to meet electoral equality, reflect community identity where practicable, and support effective and convenient local government at the first polls, while being deliverable for returning officers.

- **Building blocks.** For Unitaries B, C, D and E, existing county electoral divisions would be used as the starting point and, where this improves equality and practicality, uplifted to two-member wards. Single-member wards may still be used where necessary to minimise variance or reflect identity.
- **Bespoke exception.** For Unitary A, a bespoke interim scheme is recommended where returning-officer readiness and local evidence support a coherent pattern with better interim equality.
- **Illustrative totals.** On this basis the interim model provides about 297 councillors across the five councils, with elector-to-member ratios typically in the 3,600 to 5,100 range. These figures are illustrative. Final numbers, ward boundaries and ratios will be set by the Secretary of State in the Structural Changes Order and then



- reviewed in detail by the LGBCE after vesting.
- This approach follows best practice from recent reorganisations. It ensures the first elections are deliverable and reasonably fair, while leaving the LGBCE free to carry out a full review post-vesting.

**Unitary A** (Brighton, Hove, Peacehaven, Telscombe, Falmer): 59 councillors

**Unitary B** (Eastbourne, Hastings, Rother, Seaford, Newhaven, southern Wealden): 67 councillors

**Unitary C** (Mid Sussex, northern Wealden, Lewes hinterland): 55 councillors

**Unitary D** (Crawley, Horsham, Chichester): 62 councillors

**Unitary E** (Arun, Adur, Worthing): 54 councillors

These figures are indicative only. Final numbers and warding would be determined by the Secretary of State in the SCO and then reviewed in detail by the Local Government Boundary Commission for England after vesting.

Neighbourhood voice

Parish and town councils would continue unchanged, but with the opportunity for a reset and stronger relationship with the new unitary councils. Subject to budget and statutory process, the new authorities would be expected to consider a Parish, Town and Community Charter. Such a Charter could set out standards for responsiveness, early

engagement and escalation routes when issues arise. It would be owned by the new councils, reviewed periodically and tailored to local need.

In unparished areas, no new parish councils would be imposed. Residents would remain represented by their ward councillors and retain the right to petition for a Community Governance Review. New councils may also choose to pilot tools such as neighbourhood forums or participatory budgeting to strengthen local voice without creating new bureaucracy.

Devolution to communities

Where both sides request it, and where capacity and value for money are demonstrated, defined functions could be delegated to parish and town councils under existing legislation. This would only happen by mutual agreement and subject to council decisions. Nothing would be imposed.

Fairness in council tax

Neighbourhood empowerment also requires financial candour. Council tax would be harmonised fairly over a clear glidepath, subject to the Structural Changes Order, and explained in advance. Parish precepts will continue to be set locally.

Assurance and accountability

From day one each new council will maintain overview and scrutiny arrangements and a standards regime, so that residents can hold decision-makers to account.

12. Our plan for delivery

This section sets out how reorganisation is intended to be delivered in Sussex if Ministers decide to proceed. It is a practical plan designed to demonstrate deliverability, continuity and assurance. The principles are clear: keep services steady on day one, join up the things residents do not see during the first year, and deliver visible improvements in years two and three.

The framework applies to all five proposed councils, but each new unitary would remain responsible for its own detailed implementation. For the council we would deliver, we would adopt the framework in full.

Programme governance

Implementation would be led by a Senior Responsible Officer and a Programme Board including the Section 151 Officer, Monitoring Officer and senior service leads. The Programme Board would report to each council’s Audit & Risk Committee for implementation assurance, in addition to external gateway reviews. Independent assurance would be commissioned at key milestones, consistent with recent reorganisations. Governance will be proportionate to avoid duplication across the five councils.

Legal route and governance during transition

Ministers will decide the legal route. The programme is designed to be deliverable through creation of:

- a new authority with a shadow period (for Unitaries B-E), and

- a continuing-authority route with an implementation executive for Unitary A.

The request is for the Unitary A to be treated as a Continuing Authority and for Brighton & Hove to retain its City Status. Unitary A could be treated as a Continuing Authority of Brighton & Hove with a modest increase in population by including Falmer Parish, East Saltdean & Telscombe Cliffs and Peacehaven wards from Lewes District Council. Existing contractual arrangements within the extended areas would be novated to the City Council, thus minimising disruption and cost. Continuity of service provision in the areas of SEND, children’s social care, adult social care, planning, waste, homelessness would be achieved by including the relatively small number of additional clients in the extended area within the City Council’s existing operational delivery arrangements. There would be no need for complex property transfer or TUPE arrangements to be put in place and this would allow for faster and more efficient mobilisation. This is the preferred route for Unitary A due to the de minimus change in population size and the significant minimisation of disruption that would be achieved.

The Local Government Boundary Commission for England (LGBCE) would carry out a full electoral review post-vesting.

Timeline

The plan follows the Sussex Devolution Pathfinder Programme (DPP):

Q4 2025–Q1 2026: Government consultation on proposals.

Spring 2026: Ministerial decision; Structural Changes Order drafted.

2027/28: Shadow authority year, with shadow members elected in May 2027.

April 2028: Vesting Day: new councils become operational.

Before vesting: legal, financial and ICT foundations would be put in place, staff seconded where helpful, and transfer schemes agreed with neighbours. Vesting day is intended to be about continuity, with frontline services kept running and residents contacting the council in the usual ways. These milestones are indicative and dependent on Government decision.

Disaggregation and reaggregation

Unlike whole-district models, this proposal requires some disaggregation and reaggregation of services. That means separating county functions in some areas and recombining them into new footprints.

To manage this safely:

- A Sussex Implementation Framework would set common rules for allocation of staff, budgets, contracts and casework.
- Standard identifiers (such as UPRNs) would be used to match records, with reconciliation and dual running where safest.
- Protocols with neighbours would cover waste flows, SEND transport, depots and joint services to avoid disruption.
- Memoranda of Understanding would set out handover and escalation routes where footprints do not initially align.

This approach brings higher programme

complexity in the short term, but avoids the longer-term inefficiencies. Complexity will be front-loaded, but lessons from other reorganisations will be applied to reduce risk.

Service continuity

Statutory eligibility and entitlements are intended to remain unchanged in law. Care packages and placements will transfer safely, with managed exceptions only where agreed with families and providers. Front doors for advice, safeguarding and urgent help would remain open in the same places and with the same contact details.

Specific safeguards include:

- Safeguarding Partnerships
- NHS Sussex Transition Protocol for discharge to assess, reablement, equipment services and SEND transport, with named single points of contact and escalation routes.
- Continuity agreements for shared services and temporary hosted arrangements where footprints change.
- Neighbourhood access: civic offices and local points would remain open in Year 1; parish precepts would continue to be set locally.

People and culture

Colleagues would transfer under TUPE with full protections. Terms and conditions would not change on day one. A joint consultative forum would operate for the life of the programme. Induction would focus on safe practice, escalation routes and risk reporting. Wellbeing and engagement of staff will be a central part of the programme.

Pension responsibilities would be split on actuarial advice and administered under admitted-body agreements.

Digital and data

The principle is platform-first, not big bang. Existing corporate platforms would be used as the receiving environment to reduce risk.

- Devices and accounts would be set up ahead of vesting with secure connectivity and single sign-on.
- Data would be migrated in controlled steps with reconciliation and dual running where safest.
- Data protection impact assessments would be completed, with Caldicott Guardian oversight for clinical and safeguarding transfers.
- Cyber security posture would be externally assessed with priority fixes completed before vesting.
- Residents will continue to use familiar websites and phone numbers, with redirects in place.

Finance and council tax

Financial standing would be secured with:

- IFRS opening balance sheets, signed off by external audit;
- clear treatment of reserves and debt, with ringfencing in the SCO;
- agreed collection-fund adjustments;
- bank accounts, payroll and creditor systems live from day one.

Council tax would be harmonised fairly over a transparent glidepath, subject to the Structural Changes Order, with damping/ equalisation applied where required to protect residents during transition. Parish precepts would remain separate.

Contracts and suppliers

Contracts would transfer under the SCO or by novation. Existing end dates would be respected and no contract would be re-let for the sake of it.

A 90-day supplier readiness plan would be published during the shadow year, setting default routes for critical contracts: novate unless a re-let is demonstrably safer. Supplier engagement would begin early to avoid disruption.

Estates and local access

Civic buildings and access points would remain in public use. A light-touch approach would be taken to estates in the first year so staff and residents can carry on as normal. Branding would only change at end of life or where safety requires it.

Benefits realisation and assurance

The first and most important benefit is stability on vesting day: bins collected, care provided, local offices open.

From there, duplication would be removed behind the scenes, reducing overheads and releasing capacity for frontline services. Practical improvements residents would see include:

- fewer hand-offs,
- faster decisions,
- clearer lines of responsibility.

Benefits would be tracked in a published ledger. Verified benefits and delivery risks would be reported to Members and published annually post-vesting, with an in-year update if material changes occur.



Risks and mitigations

Risks would be managed through a single register with clear owners, mitigations and contingencies for high-risk items such as ICT cutover, payroll, contract transition and public confidence. Proportionate Equality Impact Assessments would be carried out for key decisions.

A fuller explanation on risks and dependencies is set out in the next section.

Transitional funding

Delivering structural reform at Sussex scale requires significant one-off investment. Our modelling shows estimated transition and transformation costs ranging from £168m to £197m for the five-unitary option. This reflects the number of ICT consolidations, branding and communications exercises, and programme delivery requirements.

Government has been clear that transition funding is expected to be met from local capital receipts rather than new grant. While that route is available, it carries opportunity costs: disposing of assets or drawing down reserves reduces councils’ ability to invest in housing, regeneration and climate priorities during the same period. Across Sussex, usable reserves are finite, and in some authorities already under strain.

Funding a transition of this scale wholly from receipts would require using a proportion of available reserves, diverting resources from other pressing local needs.

We can manage this safely by moving in waves, running critical systems in parallel until they are proven, and using shared platforms to avoid duplicating effort five times. Capital receipts are part of the funding mix, but they come with trade-offs. We would protect frontline services, keep a minimum reserve, and track every saving in a published benefits ledger. Transitional

support from Government would reduce risk and bring benefits forward sooner, but the plan remains deliverable within the guardrails above.

To mitigate risk, we propose:

- **Capital receipts strategy:** a published pipeline of qualifying disposals, with timings and valuations, supported by a Flexible Use of Capital Receipts strategy that demonstrates future savings. If receipts underperform, fallback options would include prudential borrowing for capitalisable ICT/estates, supplier-staged payments, or reprofiling low-impact capital programmes, subject to decisions of the new councils.
- **Financial guardrails:** no drawdown below risk-assessed minimum reserves; no cuts to statutory services to fund transition; no unfunded redundancy programmes; and benefits only counted when independently verified.
- **Phased implementation:** ICT and data migrations delivered in waves with freeze windows where needed. Where safer, dual running would continue until systems are reconciled.
- **Shared platforms:** finance, HR/payroll, customer contact, cyber and data systems procured once and used across the five councils, cutting cost while preserving local control.
- **Transparent assurance:** progress and benefits tracked in a published benefits ledger, with independent external assurance providing go/no-go checks on readiness.

This balanced approach allows the transition to be funded within existing national policy, while safeguarding essential services and protecting councils from undue financial strain.

13. Risks and Dependencies

Every reorganisation of this scale carries risks. The purpose of this section is to show that we recognise them, that mitigations are planned, and that residual risks are transparent. A full register with owners and ratings will be developed at programme mobilisation.

Our approach is open-eyed. Reorganisation is not without risk, but the risks are identifiable, manageable and proportionate. The mitigations are practical and consistent with best practice from recent reorganisations. Independent assurance and published reporting will give Ministers, residents and partners confidence that the transition is safe and deliverable.

Programme risks

Transition complexity

Creating five new unitaries involves both disaggregation and reaggregation. Without safeguards, complexity could delay delivery or increase costs. We will manage this through a Sussex-wide implementation framework, phased waves, dual running where necessary, and clear governance gateways.

ICT and data cutover

Merging and separating systems creates risk of service disruption or data loss. Mitigation includes adopting a platform-first approach (using existing systems as receiving environments), agreed freeze windows, dual running where safest, use of UPRNs and NHS identifiers to create reconciled golden records, and mandatory Data Protection Impact Assessments with external cyber assurance.

Workforce, TUPE and pensions

Staff need clarity, protection and confidence.

The programme will apply full TUPE protections, maintain admitted-body pension agreements, run parallel payroll in the first cycle, and establish a joint consultative forum with unions.

Service continuity

Residents must see no break in statutory services. Continuity protocols will include safeguarding pathways, SEND provision, and NHS discharge arrangements. The intention is to keep all current access points open on day one under the SCO, subject to operational safety. A list of continuity guarantees could be published in advance, with clear caveats, and scenarios tested in advance.

Opening balances and council tax harmonisation

Councils will begin with different reserves, debt and tax levels. The mitigation is a transparent, government-approved glidepath for harmonisation, signed off through audit, with damping where needed to avoid sharp shocks.

Contracts and suppliers

Service risk arises if novations or terminations slip. We will implement a 90-day supplier readiness calendar, novate contracts by default, and apply temporary hosted or shared service agreements where necessary.

External dependencies

Government criteria clarity

We have built this proposal against the six published tests. If Ministers adjust the interpretation, we will need clear guidance to apply consistently across Sussex.

Parliamentary slot

The Structural Changes Order requires parliamentary time. Any slippage could compress delivery. Mitigation is early drafting, external legal check, and an indicative schedule agreed with Government.

Fair Funding Review and national reform

Social care, SEND and homelessness pressures cannot be solved by reorganisation alone. Our modelling is prudent and does not assume relief from the Fair Funding Review. Any positive outcome would be treated as upside.

Transition funding

Government policy is that transition costs should be met from local capital receipts. That route is available but carries opportunity costs: disposing of assets or using reserves reduces councils’ ability to invest in housing, regeneration and climate priorities. To mitigate this we will:

- protect a minimum reserve in every new authority
- sequence receipts disposal to avoid cliff edges
- track delivery through a published benefits ledger
- request time-limited transitional capacity funding from Government, with milestone-linked drawdowns and independent verification.

Partner dependencies

Delivery relies on alignment with NHS Sussex, Sussex Police, Fire & Rescue and other agencies. Continuity will also require engagement with regulators such as CQC, Ofsted and HMICFRS. This will be secured through co-signed NHS Transition Protocols, data-sharing agreements and DPIAs (with Caldicott oversight where applicable), and cross-boundary service protocols.

Residual risk

Even with mitigations, residual risks remain. The programme is ambitious and requires sustained focus. Independent assurance and readiness gateways will provide Ministers, residents and partners with transparent go/no-go decisions at critical stages.

Risk summary

Risk	Why it matters	Mitigation	Residual risk
Transition complexity	Disaggregation/ reaggregation increases cost and delivery risk	Sussex framework, phased waves, dual running, gateways	Medium (Manageable with mitigation)
ICT/data cutover	Risk of outage or data loss	Platform-first, freeze windows, UPRNs/ NHS IDs, DPIAs, cyber assurance	Medium (manageable with mitigation)
Workforce/TUPE/ pensions	Morale, retention, legal continuity	TUPE protections, admitted-body agreements, dual payroll, union forum	Medium-low (residual risk proportionate)
Service continuity	Safeguarding, SEND, NHS discharge must not break	NHS Transition Protocol, SPOCs, scenario tests, access points open	Medium-low (mitigations reduce risk to proportionate level)
Opening balances & council tax	Day-one financial standing, predictable bills	IFRS opening balances, audit sign-off, glidepath with damping	Medium-low (guard rails in place)
Contracts & suppliers	Risk of gaps if novations slip	90-day supplier plan, default novation, temporary hosted services	Medium (manageable with mitigations)
Parliamentary slot	SCO timing risk could compress delivery	Early drafting, external legal check, published schedule	Medium (Manageable with mitigations)
Funding reform/ receipts	National pressures remain; receipts carry opportunity costs	Guardrails, receipts sequencing, transitional ask with verification	Medium (mitigated but remains external dependency)

# 14. Our asks of government

We recognise that final decisions rest with Ministers. Our asks are designed to give clarity, protect services and make sure change is delivered safely. They are consistent with approaches used in recent reorganisations in Dorset, Northamptonshire and Somerset.

We ask that the statutory consultation is run on a Sussex-wide basis so residents can see, in one place, the whole map of options across both invitation areas. Many people live, work and travel across the East–West boundary every day. A single consultation, or at minimum a fully aligned pair of consultations with shared evidence and a single comparative pack, would help residents compare like-for-like and give Ministers a fair read on the whole Sussex picture.

We ask that Government considers capacity funding to underwrite safe delivery of the programme. This follows the precedent seen elsewhere, where Government has funded programme teams, legal drafting, ICT migration, audit and assurance so that day-to-day services remain protected. If available, time-limited capacity support with milestone-linked drawdown and independent verification would reduce risk and shorten dual running.

We ask that Government confirms a fair and predictable glidepath for council tax harmonisation. Recent reorganisations have used up to five years. We would welcome the same flexibility here, subject to the Structural Changes Order, with parish precepts continuing to be set locally.

We ask that technical finance directions provide for a neutral and orderly transfer. This includes adjustments to settlements and

business rates baselines, treatment of reserves and debt, and clear guidance on collection funds so surpluses and deficits are shared fairly at vesting. We also ask for transitional protection, if required, should the Fair Funding Review or a rates reset fall during the programme, recognising that all councils are currently managing financial pressure.

We ask that the Structural Changes Order contains the standard provisions used in other reorganisations. These include precise ward and parish schedules, clean maps, transfer of property, rights, liabilities and staff, confirmation of the vesting date, and any necessary provisions on Section 24 controls and electoral arrangements.

We ask that the proposed Unitary A is considered as a Continuing Authority in recognition of the significant benefits this will achieve in speed and cost of implementation and balanced against the de minimus boundary change involved for this new Unitary Council. It will be important to also include legal protection for the City Status of Brighton & Hove.

Finally, we ask for the standard flexibilities that allow councils to deliver change at pace and with care. These include permission to use capital receipts for transformation, confirmed pension arrangements on the advice of fund actuaries, and the ability to operate temporary hosted or shared arrangements across borders where this protects residents during transition.

With these provisions, Government can give residents clarity, safeguard essential services and allow the new councils to focus on making services simpler and better across Sussex.

# 15. Where to find the detail

## Annex A: Financial modelling and sensitivities

Estimated one-off transition costs, recurring efficiencies and breakeven periods. Sets out assumptions on harmonisation and national funding reforms, with high/low sensitivities.

## Annex B: Equalities screening

Proportionate equality screening at proposal stage, with a commitment to full Equality Impact Assessments at implementation.

## Annex C: Engagement summary

Sets out the non-statutory engagement undertaken so far, explains its scope and limitations, and notes that statutory consultation will test the Sussex-wide option in full.



Appendix A: financial model methodology

Three stages of financial modelling have been adopted to transparently delineate between separate elements of costs and benefits:

Financial sustainability baseline: the ongoing financial sustainability of each proposed authority across the MSA region, focusing on indicative structural challenges for each proposed authority and creating equitable distribution of likely net expenditure requirements and core spending power at each authority. This serves as a baseline from which to apply transformation benefits and delivery costs and has been the prevalent focus of financial modelling

Transformation and reorganisation benefits: ongoing/revenue structural revenue benefits and disbenefits associated with LGR, enabled through consolidation and elimination of duplication. The annualised benefits delivered are expected to increase of the medium-term as transformation is implemented

Implementation costs: one-off delivery costs of delivering transformation, including disaggregation and reaggregation of services, also expected to be incurred over a medium-term period

1. Financial sustainability baseline	<ul style="list-style-type: none"><li>• Estimated structural position of revenue expenditure requirement vs. spending power</li><li>• Medium-term view of likely change to demand and spending power (including council tax harmonisation)</li><li>• Debt summary</li><li>• Reserves summary and forecast</li><li>• Applicable to the region as a whole and then each proposed authority individually</li></ul>
2. Transformation and reorganisation benefits	<ul style="list-style-type: none"><li>• Ongoing benefits associated with reorganisation to the new option (e.g. consolidation of services and elimination of duplication)</li><li>• Applicable to the region as a whole and then each proposed authority individually</li></ul>
3. Implementation costs	<ul style="list-style-type: none"><li>• Disaggregation / reaggregation</li><li>• Enterprise transformation / implementation costs</li><li>• Applicable to the region as a whole and then each proposed authority individually</li></ul>

While transformation is the mechanism for realisation of genuine public sector benefits (both financial and non-financial), it is acknowledged that estimates at this stage will require significant testing and validation with data not available to Brighton & Hove City Council during this phase of the LGR process. However, analysis demonstrates that the following are most likely to determine viability of all options:

- Financial sustainability baseline (service demand and core spending power)
- Outcome of the Fair Funding Review 2.0<sup>i</sup>
- Funding of one-off change (i.e. distribution and availability of existing reserves to proposed authorities). It is of particular note that reliance solely on reserves to fund transformation will be incredibly challenging in Sussex and central government funding and/or flexible capital receipts (e.g. from asset rationalisation) will almost certainly be required

Financial sustainability baseline

Structural revenue projections

Brighton & Hove City Council’s approach to financial sustainability modelling across the Sussex MSA can be summarised as follows:

- Summarise revenue expenditure of existing authorities
- Summarise spending power of existing authorities
- Allocate drivers, and values of those drivers, as a basis to disaggregate revenue expenditure and spending power of existing authorities
- Create District and ward geographies that can be constructed into proposed authorities for all options (these are district geographies or collections of ward geographies where options propose changes)
- Map District and ward geographies to proposed unitary authorities for each option
- Disaggregate revenue expenditure and spending power for District and ward geographies
- Restate revenue expenditure and spending power for proposed authorities
- Forecast critical changes to core spending power in future years
- Model council tax harmonisation schedule
- Forecast revenue expenditure and spending power for a five year period and identify structural revenue challenge (i.e. the value of maximum projected difference between revenue expenditure and spending power, and the year in which it occurs)

The following sections break down these steps in more detail and indicate the source data.

Summarise revenue expenditure of existing authorities

Restating FY25/26 revenue expenditure returns (RA returns)<sup>ii</sup> into a structured summary of net income and expenditure in a standardised format similar to a statement of accounts.

Summarise spending power of existing authorities

Restating FY25/26 revenue financing returns (SG returns)<sup>iii</sup> into a structured summary



of grants outside Aggregated Expenditure Finance (AEF), grants inside AEF and revenue expenditure financing.

Allocate drivers, and values of those drivers

Allocate every RA/SG code with a driver to disaggregate spend. For example, Adult Social Care (RA code 360) is disaggregated using a population-IMD composite. Internal data across East Sussex and West Sussex was not available. List of drivers used (some of which have been calculated into composites):

- Population by ward (by age and sex)<sup>iv</sup>
- Forecast population (2032)<sup>v</sup>
- Homeless cases accepted (FY23/24)<sup>vi</sup>
- Tax base (2024)<sup>vii</sup>
- Tax base (2021)<sup>viii</sup>
- IMD<sup>ix</sup>
- Collection rates<sup>x</sup>

Create ‘building block’ geographies

Create ‘building block’ geographies from existing wards. This mostly uses district footprints but the following areas are comprised of ward level groupings:

- Three sub-groups for the Lewes footprint:
  - Lewes – merged wards: part of unitary A in the five unitary proposal
  - Lewes – coastal: part of unitary C in the five unitary proposal
  - Lewes – inland: part of unitary C in the five unitary proposal
- Two sub-groups for the Wealden footprint:
  - Wealden – north: part of unitary C in the five unitary proposal
  - Wealden – south: part of unitary B in the five unitary proposal

The following table provides a full description of the wards in each ‘building block’ area.

Building block’ geography	Wards included
Brighton & Hove	All
Eastbourne	All
Lewes - merged wards	East Saltdean & Telscombe Cliffs Kingston Peacehaven East Peacehaven North Peacehaven West
Lewes - inland	Chailey, Barcombe & Hamsey Ditchling & Westmeston Lewes Bridge Lewes Castle Lewes Priory Newick Ouse Valley & Ringmer Plumpton, Streat, East Chiltington & St John Wivelsfield
Lewes - coastal	Newhaven North Newhaven South Seaford Central Seaford East Seaford North Seaford South Seaford West
Hastings	All
Rother	All
Wealden - north	Arlington Buxted Chiddingly, East Hoathly & Waldron Crowborough Central Crowborough Jarvis Brook Crowborough North Crowborough South East Crowborough South West Crowborough St Johns Danehill & Fletching Forest Row Framfield & Cross-in-Hand Frant & Wadhurst Hadlow Down & Rotherfield Hailsham Central Hailsham East Hailsham North Hailsham North West

Wealden - north	Hailsham South Hailsham West Hartfield Heathfield North Heathfield South Hellingly Horam & Punnetts Town Maresfield Mayfield & Five Ashes Uckfield East Uckfield New Town Uckfield North Uckfield Ridgewood & Little Horsted Withyham
Wealden - south	Herstmonceux & Pevensey Levels Lower Willingdon Pevensey Bay Polegate Central Polegate North Polegate South & Willingdon Watermill South Downs Stone Cross Upper Willingdon
Adur	All
Arun	All
Chichester	All
Crawley	All
Horsham	All
Mid Sussex	All
Worthing	All

**Map ‘building block’ geographies to proposed unitary authorities for each option**  
Mapping of ward and population data for ‘building block geographies’ (from step 3 above) to new proposed unitary authorities for each option.

**Disaggregate revenue expenditure and spending power for ‘building block’ geographies**  
Disaggregate East Sussex County Council and West Sussex County Council revenue expenditure and spending power across corresponding districts, using allocated drivers and associated values of those drivers (from step 3 above).

Further disaggregate resulting Lewes District Council and Wealden District Council figures into ‘building block’ areas (from step 4 above). Note that population figures are available by wards and tax base has been calculated by:

- Using published council meeting notes from Lewes for town and parish council Band D

- equivalents, in combination with national council taxbase data, to deduce tax base by ward<sup>xi</sup>
- Weighted by population where detailed taxbase data was not available for Wealden District Council

**Restate revenue expenditure and spending power for proposed authorities**  
Sum the related component financial data for each area to restate existing FY25/26 position for proposed authorities in each option (using the mapping from step 5 above).

**Forecast critical changes to core spending power in future years**  
Forecast key spending power components from FY26/27 onwards<sup>xii</sup>, disaggregating into ‘building block’ areas and proposed unitary authorities for each option as above (i.e. using the same methodology/drivers/driver values).

**Model council tax harmonisation**  
Model council tax harmonisation using combined precepts (i.e. sum of upper and lower tier precept, excluding parish councils and any other precepting authority)<sup>xiii</sup> of existing authorities for each ‘building block’ geography, in combination with council tax base (by ward) and collection rates (existing local authority CTR1 returns)<sup>xiv</sup>.

- Council tax decisions will ultimately be decided by Members of the new authorities. However, the following assumptions demonstrate that harmonisation in all options can be achieved within two council tax setting cycles and demonstrate minimum council tax foregone in each option:
- No council tax precepts are reduced
  - Maximum 4.99% increases applied to the lowest combined precept in each proposed authority
  - Precepts in the remaining part of each authority are frozen, or applied with a reduced increment in the year it is exceeded by the lowest precept in the proposed authority, until all precepts are equalised

- Forecast revenue expenditure and spending power for a five year period**  
Calculate the difference between projected revenue expenditure and spending power by financial year by:
- a) Creating a view of FY25/26 using current tax base and adjusting contributions from reserves (which are a starting pressure currently being met from reserves)
  - b) Forecast FY25/26 onwards by:
    - i) Multiplying the FY25/26 revenue expenditure requirement, which has been adjusted for likely service demand, by annual OBR inflation estimates xiv and annualised forecast percentage population increase
    - ii) Forecasting spending power by:
      - Introducing Pixel estimates of major funding components (e.g. Retained business rates and RSG) where they are known; or
      - Incrementing by CPI inflation forecasts for core grants not covered by Pixel data
    - iii) Introducing maximum council tax attainable from the harmonisation schedule, applying a further increase to the taxbase based on average annual growth of Band D equivalent in the area of the proposed unitary over the last three years

Analyse largest structural gap by year, as total/percentage/deficit per capita.

Debt and reserves modelling

Summarise debt and investments

Summarise total debt and investments at each existing authority across (data does not distinguish between General Fund and HRA).<sup>xv</sup>

Summarise debt servicing

Summarise annual principal, leasing and interest payments as per FY25/26 RA returns at each existing authority.

Summarise usable revenue reserves

Analyse current budget statements to estimate general and earmarked reserves. These include capital and ringfenced balances but exclude schools.<sup>xvi</sup>

Disaggregation and reaggregation

Use of similar disaggregation and reaggregation principles and calculations as set out in elsewhere in this appendix to summarise debt/investments, annual debt servicing and usable revenue reserves in the context of the financial sustainability baseline.

Transformation and reorganisation benefits

Four areas of transformation benefits were assessed and disaggregated, to apply these benefits to the financial sustainability baseline of each proposed authority/geography:

1. Transformation benefits
- a. Service duplication

b. Agile unitaries

c. Joint working
2. Disaggregation disbenefits
3. Member consolidation
- a. Basic allowances

b. Special responsibility allowances
4. Elections
5. Senior leadership consolidation

Transformation benefits

In each of the following areas, an estimate of controllable annual expenditure has been made by removing grants and funding (both inside and outside AEF) which are arguable directly attributable service areas to estimate controllable net expenditure in the base revenue for each of the proposed geographies. For example:

- Education service expenditure is adjusted to remove DSG, Pupil Premium Grant and Universal Infant School Meals funding
- Children’s service expenditure is adjusted to remove Children’s Social Care Prevention Grant funding

Note that no benefits have been applied to Education or Public Health in any scenario to take a conservative view in areas where there is less consensus and/or evidence in the right operating model.

The following table details application of benefits in each scenario:

Three unitary scenarios

Area	Benefit applied to estimated controllable net expenditure (%) Benefit (+)/ Disbenefit (-)	Explanation
Service duplication	+8.0%	Economies of scale in services being aggregated at district level: <ul style="list-style-type: none"><li>• Housing Services (GFRA only)</li><li>• Cultural and Related Services</li><li>• Environmental and Regulatory Services</li><li>• Planning and Development Services</li><li>• Central Services</li></ul>
Agile unitaries	0.0%	Right-sizing the scale of unitaries in social care (PeopleToo research) <sup>xvii</sup> applicable to: <ul style="list-style-type: none"><li>• Children’s Social Care</li><li>• Adult Social Care</li></ul>
Joint working	+2.0%	Shared working and collaboration from services more transactional in nature and/or could benefit from a regional approach and/or which are most likely to benefit from economies of scale: <ul style="list-style-type: none"><li>• Highways and Transport</li><li>• Environmental and Regulatory Services</li><li>• Central Services</li></ul>
Disaggregation disbenefits	0.0%	Lost economies of scale, loss of larger pools of flexible resources, increasing overhead burden (e.g. ICT infrastructure, support/democratic services of sovereign authorities) arising in services already delivered on a larger county scale: <ul style="list-style-type: none"><li>• Education</li><li>• Highways and Transport</li><li>• Children’s Social Care</li><li>• Adult Social Care</li><li>• Public Health</li><li>• Central Services</li></ul>

Four unitary scenarios

Area	Benefit applied to estimated controllable net expenditure (%) Benefit (+)/ Disbenefit (-)	Explanation
Service duplication	+6.4%	Economies of scale in services being aggregated at district level: <ul style="list-style-type: none"><li>• Housing Services (GFRA only)</li><li>• Cultural and Related Services</li><li>• Environmental and Regulatory Services</li><li>• Planning and Development Services</li><li>• Central Services</li></ul>
Agile unitaries	+2.0%	Right-sizing the scale of unitaries in social care (PeopleToo research)xviii applicable to: <ul style="list-style-type: none"><li>• Children’s Social Care</li><li>• Adult Social Care</li></ul>
Joint working	+2.0%	Shared working and collaboration from services more transactional in nature and/or could benefit from a regional approach and/or which are most likely to benefit from economies of scale: <ul style="list-style-type: none"><li>• Highways and Transport</li><li>• Environmental and Regulatory Services</li><li>• Central Services</li></ul>
Disaggregation disbenefits	-0.7%	Lost economies of scale, loss of larger pools of flexible resources, increasing overhead burden (e.g. ICT infrastructure, support/democratic services of sovereign authorities) arising in services already delivered on a larger county scale: <ul style="list-style-type: none"><li>• Education</li><li>• Highways and Transport</li><li>• Children’s Social Care</li><li>• Adult Social Care</li><li>• Public Health</li><li>• Central Services</li></ul>

Five unitary scenarios

Area	Benefit applied to estimated controllable net expenditure (%) Benefit (+)/ Disbenefit (-)	Explanation
Service duplication	+4.8%	Economies of scale in services being aggregated at district level: <ul style="list-style-type: none"><li>• Housing Services (GFRA only)</li><li>• Cultural and Related Services</li><li>• Environmental and Regulatory Services</li><li>• Planning and Development Services</li><li>• Central Services</li></ul>
Agile unitaries	+3.0%	Right-sizing the scale of unitaries in social care (PeopleToo research)xix applicable to: <ul style="list-style-type: none"><li>• Children’s Social Care</li><li>• Adult Social Care</li></ul>
Joint working	+2.0%	Shared working and collaboration from services more transactional in nature and/or could benefit from a regional approach and/or which are most likely to benefit from economies of scale: <ul style="list-style-type: none"><li>• Highways and Transport</li><li>• Environmental and Regulatory Services</li><li>• Central Services</li></ul>
Disaggregation disbenefits	-0.8%	Lost economies of scale, loss of larger pools of flexible resources, increasing overhead burden (e.g. ICT infrastructure, support/democratic services of sovereign authorities) arising in services already delivered on a larger county scale: <ul style="list-style-type: none"><li>• Education</li><li>• Highways and Transport</li><li>• Children’s Social Care</li><li>• Adult Social Care</li><li>• Public Health</li><li>• Central Services</li></ul>



Member consolidation

A separate appendix on Member numbers and warding scheme details the proposals made for each new area, while this section covers the financial workings. Data from FY24/25, including basic and special responsibility allowances, is collected from each authority<sup>xx</sup> (excluding outturns of travel and expenses which are assumed to remain constant).

Proposed basic allowances are assumed using the costs of BHCC, ESCC and WSCC councillors for each geography as relevant. This leads to:

- A total of 294 Members in a three unitary model
- A total of 294 Members in a four unitary model
- A total of 297 Members in a five unitary model

A structure for special responsibility allowances for a ‘typical’ unitary is assumed using data from South East Employers for unitary authorities in the South East. This element is duplicated for each proposed authority (at a cost of £222K per unitary authority).

Elections

Electoral costs are assumed constant in each option and based on Maximum Recoverable Amounts from recent elections xxi. Without more detailed proposals, it is assumed that LGR will present an opportunity for all-out elections and create a modest but constant savings in all options.

More detailed work to understand cost drivers is needed but it is currently assumed that this is likely to be staff and polling stations, which are conservatively assumed to remain relatively unchanged in each option.

There could be further opportunity to align town/parish, local, remaining PCC and CA elections for wider public sector savings.

Senior leadership consolidation

Data from FY24/25 accounts is collected from each authority regarding senior leadership roles<sup>xxii</sup>.

Current senior leadership of two tier areas, is disaggregated against across the proposed geographies.

Similarly to the Members approach, an assumed senior leadership structure of a typical unitary authority is assumed for each unitary authority (adjusted for FTEs where shared leadership already exists), duplicated for each proposed authority and deducted from the current disaggregated costs.

Implementation costs

Benchmarked values of costs (and benefits) xxiii adjusted relating to number of existing authorities with multipliers applied for number of existing, number of proposed and complexity of disaggregation:

Cost group	Cost sub-group	Explanation
Transition	Shadow authorities	Cost associated with implementation and maintenance of shadow authorities will move in line with total number of proposed authorities. (Set up, Member basic allowances, additional cabinet, allowances and Head of Paid Service costs etc.)
Transition	Election to shadow authorities	
Transition	Programme delivery	<p><b>Five unitary model and cost of delivery driven by:</b> Disaggregation of East Sussex County Council three ways across district and ward boundaries Disaggregation Lewes District Council three ways across ward boundaries Disaggregation of Wealden District Council two ways across ward boundaries Disaggregation of West Sussex County Council three ways across district boundaries, including change to coterminous Fire &amp; Rescue Service hosted by West Sussex Reaggregation of upper and lower tier services across the MSA, increasing upper tier service providers from three entities to five, meaning two instances where there is no continuing authority for upper tier services (i.e. upper tier services transferred into a new entity)</p> <p><b>Four unitary model and cost of delivery driven by:</b> Disaggregation of West Sussex County Council two ways across district boundaries Aggregation of lower tier services from 12 districts to three new unitaries Reaggregation of upper tier services, increasing upper tier service providers from three entities to four across the MSA, meaning one instance where there is no continuing authority for upper tier services (i.e. upper tier services transferred into a new entity)</p> <p><b>Three unitary model and cost of delivery driven by:</b> Zero disaggregation of services, meaning no instances where there is no continuing authority for upper tier services Aggregation of lower tier services only, from 12 districts to two new unitaries</p>

Cost group	Cost sub-group	Explanation
Transition	Redundancy and pension strain	Estimates highly circumstantial based on appropriate, fair and transparent process but likely to be lower in a five unitary model. Consolidation of officers, and senior officers in particular, is likely to be more significant where fewer unitaries are proposed (alongside increased recurring staff savings)
Transition	ICT consolidation	Five unitary model increases the likelihood that contracts can be exited and consolidated more quickly during disaggregation but presents additional implementation requirements for infrastructure and systems, particularly in services where less regional sharing is likely
Transition	Branding, communications and engagement	Cost associated with communications, public engagement and curation of new brands will move in line with total number of proposed authorities
Transition	Creation of new councils	Set up of sovereign new entities will move in line with total number of proposed authorities
Transition	Closedown of existing/ shadow councils	Closedown of shadow entities will move in line with total number of proposed authorities
Transformation	Programme delivery	As per transition programme delivery section above
Transformation	Redundancy and pension strain	As per transition redundancy and pension strain section above
Transformation	ICT consolidation	As per transition ICT consolidation section above
All	Contingency	5% of total budget

Cost group	Cost sub-group	One-off costs 3 unitary model**		One-off costs 4 unitary model**		One-off costs 5 unitary model**	
		Lower range (£M)	Upper range (£M)	Lower range (£M)	Upper range (£M)	Lower range (£M)	Upper range (£M)
Transition	Shadow authorities	2.7	3.2	2.9	3.4	3.1	3.6
Transition	Election to shadow authorities	2.9	3.4	3.0	3.5	3.1	3.6
Transition	Programme delivery	13.7	16.1	18.6	21.	25.3	29.7
Transition	Redundancy and pension strain	8.5	10.0	6.4	7.5	4.8	5.7
Transition	ICT consolidation	26.4	31.0	28.2	33.1	30.1	35.4
Transition	Branding, communications and engagement	1.6	1.9	2.4	2.8	3.4	4.1
Transition	Creation of new councils	3.6	4.3	4.4	5.2	5.3	6.3
Transition	Closedown of existing/ shadow councils	1.6	1.9	1.6	1.9	1.6	1.9
Transformation	Programme delivery	15.4	18.1	16.0	18.8	16.5	19.4
Transformation	Redundancy and pension strain	11.7	13.8	9.2	10.8	7.2	8.5
Transformation	ICT consolidation	15.4	18.1	30.2	35.5	59.2	69.6
All	Contingency	5.2	6.1	6.1	7.2	8.0	9.4
Total one-off implementation costs		108.7	127.9	128.9	151.6	167.7	197.2

Upper range value assumed for each option.



### Overall MTFP model

Assemble every element from the sections above to produce a view of every proposed authority, for both the proposed option and comparator options which:

- Starts with financial sustainability baseline covering each proposed authority for each financial year in each option
- Deducts apportioned transformation and reorganisation benefits/disbenefits for each proposed authority for each financial year in each proposed option
- Adds apportioned implementation costs phased for each proposed authority for each financial year in each proposed option
- Assesses the ability of each proposed authority to fund implementation by making an assumption that deficits and transformation costs are met in each financial year through usable reserves. This suggests any LGR option without further sources of funding or flexibility in funding is unlikely to be viable

The modelling does not take account of 'dynamic' factors including but not limited to:

- Mitigation of cost pressures through Officer and Member response
- Unknown political choices (e.g. council tax rates, service provision, capital borrowing, committed costs of existing plans)
- Cost pressures and overspends experienced since FY25/26 budgets have been set (which could be structural as well as in-year)
- Actual housing delivery, business growth or economic shifts in specific ward level areas
- Service data (activity and output level) to more accurately assess and disaggregate current demands, existing delivery models, forecasts and transition arrangements (in transition and transformation phases)









# Analysis Report- BHCC community consultation on LGR options

## Contents

1. Executive Summary .....	2
2. Background.....	4
2.1 Summary of the survey .....	5
3. Approach and methodology summary .....	7
3.1 Aims and objectives for the analysis: .....	7
3.2 Data handling procedures: .....	7
3.3 Analysis methodology: .....	7
3.3.1 Quantitative methodology .....	7
3.3.2 Qualitative methodology.....	8
3.3.3 Integration of Qualitative coding with the survey dataset.....	10
3.4 Assumptions and Limitations .....	11
4. Findings.....	13
4.1 Demographic data .....	13
4.2 Service usage and what matters to respondents .....	14
4.3 Options .....	22
4.4 Thematic analysis .....	36
4.4.1 Key theme 1: General feedback .....	36
4.4.2 Key theme 2: Sense of place .....	37
4.4.3 Key theme 3: Services.....	38
4.4.4 Key theme 4: Trust and confidence in BHCC .....	39
5. Recommendations .....	41

# 1. Executive Summary

## Introduction

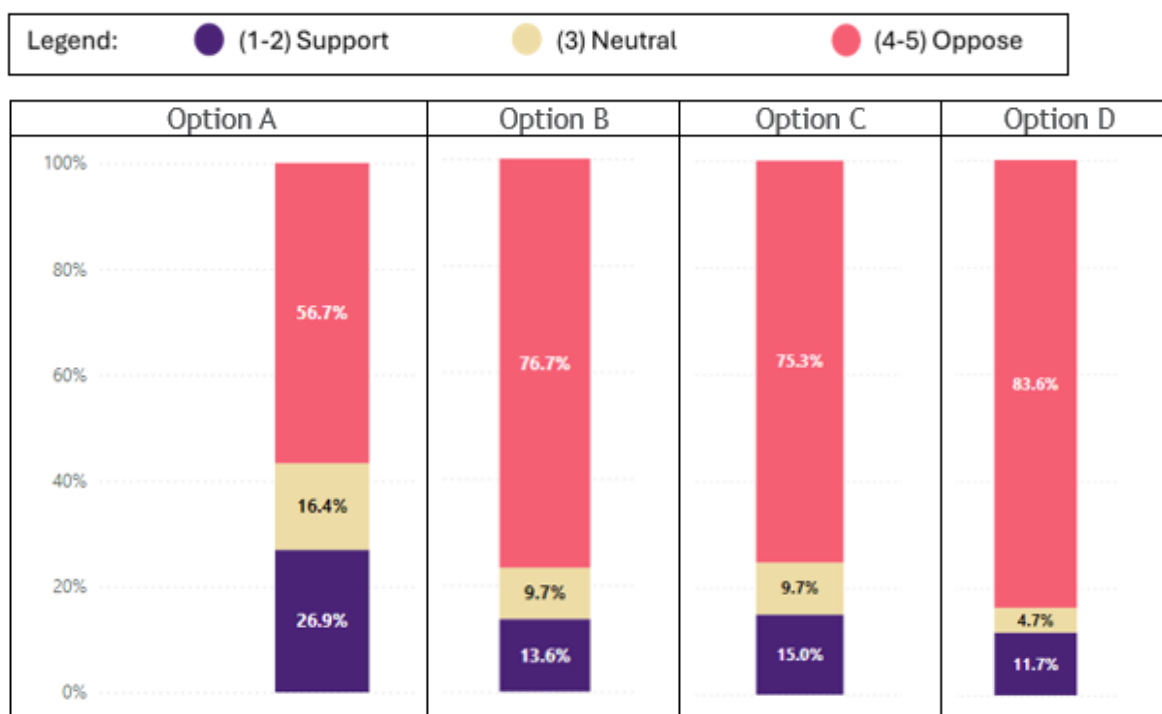
Brighton and Hove City Council (BHCC) published a community consultation, inviting responses to a public survey that closed on 25<sup>th</sup> August 2025. The principal subject of the survey were proposals developed by the council under the Local Government Reform process that requires proposals to be submitted to Ministry of Communities Homes & Local Government (MHCLG) on 26<sup>th</sup> September 2025.

## The Options

The council set out four options for respondents to consider and comment on:

- Option A - BHCC merging with the wards of East Saltdean, Telscombe Cliffs and Peacehaven
- Option B - BHCC merging with the wards of East Saltdean, Telscombe Cliffs and Kingston
- Option C - BHCC merging with the wards of East Saltdean, Telscombe Cliffs, Peacehaven and Newhaven
- Option D - BHCC merging with the wards of East Saltdean, Peacehaven, Newhaven and Kingston

While none of the options had an overall positive level of support, at the highest level of analysis Option A was the most supported across all respondents.



## Wider Themes from the Analysis

The community's feedback through this survey reveals a complex picture: a mixture of caution, scepticism, misunderstanding (of the process currently underway) but also hope. While some respondents see reorganisation as a chance to create a stronger, more capable council, many view it with concern and distrust. The overarching sentiment appears to be

that change must be justified clearly and designed carefully to avoid eroding local identity, worsening services, or concentrating power in Brighton & Hove City Council (BHCC) in relation to communities or areas that have differing characteristics.

At the heart of respondents' concerns seems to be two key issues: representation and trust. People are concerned about financial viability (i.e. debt inheritance and council tax harmonisation) and want to know that resources will be shared fairly, their voices will continue to matter, and that decision-making will not become more remote. Linked to this is a strong sense of identity and place, particularly from respondents in more rural areas with strong parish and village attachment, where historic ties to Lewes and East Sussex appear to be deeply felt. Any successful reorganisation involving or impacting these areas will need to recognise, respect and act on these identities and issues.

Service quality is another clear theme. There appears to be a perception that Brighton & Hove City Council (BHCC) is not always delivering on its current responsibilities, and this seems to undermine confidence in its ability to take on more. Respondents are particularly concerned about vulnerable groups (e.g. children with SEND, families and adults needing care), infrastructure capacity (e.g. waste, congestion on the A259 corridor), and the protection of green spaces. At the same time, some see the proposals as an opportunity for a larger council to attract investment and act decisively to deliver improvements, but only if a clear plan for service delivery and infrastructure investment is communicated.

Understanding of, and trust in, the process itself must be established and carefully supported. There was confusion about whether people could stay with existing councils, and calls for clearer information. Some participants feel the consultation has been rushed or biased, which risks alienating the very communities whose support will be needed. It is clear that many respondents were unaware that the severe constraints of both the timeline for the process imposed by central government, as well as the guidance from MHCLG on the nature and extent of the engagement, have materially impacted on the council's ability to undertake a more meaningful process.

Finally, the balance of respondents to the survey is a potentially important consideration when reviewing the outcomes, themes and insight shared in this report. There was a significantly higher number of responses from non-residents of BHCC, including a material proportion from outside the areas proposed for merging within the survey, who may not have current or accurate awareness of service performance. There also appears to have been an impactful anti-Brighton campaign in the surrounding areas and we may see the influence of this in some of the responses. While all responses to the survey have been given equal weight in this analysis, it is possible that some of the perspectives included in the analysis have been influenced by the statistical make-up of the responses.

## 2. Background

Brighton and Hove City Council (BHCC) published a community consultation, inviting responses to a public survey that closed on 25<sup>th</sup> August 2025. BHCC consulted on four options (A, B, C and D shown below), all involving merging with wards to the east of the city currently under the administration of the two-tier council area (East Sussex County Council and Lewes District Council).

These options were based on the feedback and evidence they learned from community engagement that was conducted in April 2025 and supported by service, financial and demographic data gathered in the intervening period.

### Option A: strengthening the eastern edge

This option includes East Saltdean, Telscombe Cliffs and Peacehaven, with an estimated population of 301,130.



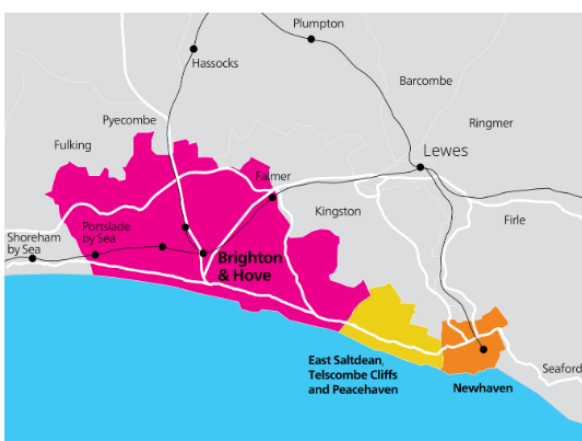
### Option B: extending to the eastern downs

This option includes East Saltdean, Telscombe Cliffs, Peacehaven and Kingston, with an estimated population of 303,117.



### Option C: uniting the coastal corridor

This option includes East Saltdean, Telscombe Cliffs, Peacehaven and Newhaven, with an estimated population of 313,955.



### Option D: coast and downs partnership

This option includes East Saltdean, Telscombe Cliffs, Peacehaven, Newhaven and Kingston, with an estimated population of 315,942.



This report sets out the principles, approach, plan and results of analysis carried out on the data received through this online consultation. It has been completed by Ignite Consulting Ltd, who are supporting BHCC with their submission to the government.



## 2.1 Summary of the survey

The survey consists of 23 optional questions. Respondents were led through the survey questions in the following order but were able to skip questions and return to them later if they wished.

Section	Question number	Response structure	Data type
About you	1. How are you primarily responding?	Select one	Quantitative
	2. What is your full postcode?	Free text	Quantitative
What matters to you	3. Which of the following Brighton & Hove services have you used in the last 12 months?	Select multiple	Quantitative
	4. Do you use similar services in other areas?	Select one	Quantitative
	5. If change does happen and your areas becomes part of a merged larger council, what would be most important to protect or preserve?	Free text	Qualitative
	6. What concerns, if any, do you have about how local councils will change through reorganisation?	Free text	Qualitative
Your views on the proposed option A	7. To what extent do you support or oppose option A: strengthening the eastern edge	Score from 1-5	Quantitative
	8. What are your main reasons for your answer?	Free text	Qualitative
Your views on the proposed option B	9. To what extent do you support or oppose option B: extending to the eastern downs	Score from 1-5	Quantitative
	10. What are your main reasons for your answer?	Free text	Qualitative
Your views on the proposed option C	11. To what extent do you support or oppose option C: uniting the costal corridor	Score from 1-5	Quantitative
	12. What are your main reasons for your answer?	Free text	Qualitative
Your views on the proposed option D	13. To what extent do you support or oppose option D: Coast and Downs Partnership	Score from 1-5	Quantitative
	14. What are your main reasons for your answer?	Free text	Qualitative
Further Comments	15. Do you have any final comments about how Brighton & Hove should be organised in future, or about any of the proposals you've seen?	Free text	Qualitative
Equalities monitoring questions	16. Do you want to answer the following equalities monitoring questions?	Yes / No	Quantitative
	17. What is your age?	Select one	Quantitative
	18. What best describes your gender?	Select one (free text option if you select 'other')	Quantitative

	19. Is the gender you identify with the same as your sex registered at birth?	Select one	Quantitative
	20. Which of the following best describes your sexual orientation?	Select one (free text option if you select 'other')	Quantitative
	21. How would you describe your ethnic origin?	Select one (free text option if you select 'other')	Quantitative
	22. Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months?	Select one	Quantitative
	23. Please select your health condition, illness or disability from the list below	Select one (free text option if you select 'other')	Quantitative

## 3. Approach and methodology summary

This section summarises the methodology with the full methodology found in the Appendix (section 2 Full methodology).

### 3.1 Aims and objectives for the analysis:

- To determine the level of public support for Options A, B, C and D
- To understand the nuance of support for each option and what this tells us about the strengths and challenges of each option
- To identify if support varies by geographic area (wards using first part of postcode) or demographic group (e.g. age range)
- To gather information that will support the implementation of Local Government reorganisation (LGR) i.e. what services are people concerned about, how do they use services, what misconceptions will need to be addressed by communications
- To ensure that there is fair and wide representation in the responses (about you, equalities monitoring).

### 3.2 Data handling procedures:

Data handling procedures covered rules around anonymisation of data, data security, data cleansing and the tools that were used to support analysis with their justification. The full data handling procedures are set out in Appendix (section 2.1 Data handling procedures). All procedures were carried out in line with the UK GDPR principles of lawfulness, fairness, accuracy, purpose limitation, data minimisation, integrity and confidentiality, and accountability. Data was processed under a signed Data Processing Agreement (DPA), with secure storage and access limited to authorised project staff.

### 3.3 Analysis methodology:

The analysis will be guided by three core principles:

1. Transparency, meaning every decision from data cleaning to statistical analysis will be documented and fully justifiable
2. Objectivity, ensuring the methodology is designed to reveal what the data shows rather than support any pre-determined outcome
3. Reproducibility, so that an independent analyst could take the raw data and accompanying documentation and exactly replicate the final results.

#### 3.3.1 Quantitative methodology

##### **Data reconciliation and validation**

Survey data was reconciled through a structured process. Response counts were manually verified in Excel and cross-checked in Power BI by both volume and unique ID. This ensured no missing or duplicated records. Two small discrepancies were identified in Q5 and Q6 (178 records in total, less than 1% of the dataset), but these did not affect the overall analysis.

##### **Building the data model**

A new Power BI file was created linking the golden dataset with external ONS geography

files. Qualitative datasets for Q5, Q6, and the option questions were appended to create a consolidated dataset. Unique respondent IDs linked qualitative and survey data, and postcodes were mapped to wards and Local Authority Districts.

#### **Preparing variables for analysis**

Several calculated fields and tables were developed to standardise and structure the data. These included grouping age into ONS categories, mapping resident vs non-resident status, categorising option scores (support, neutral, oppose), and restructuring service usage and health condition responses for analysis.

#### **Geospatial mapping and visualisation**

Icon Map Pro was used to present ward-level variations in support, neutrality, and opposition for each option. Maps applied the agreed colour scheme and ward boundaries to ensure clear and consistent visualisation.

#### **Completeness and representation**

All 2,307 responses were included in the analysis. Blank responses were not excluded but grouped as “Not Stated” to ensure full representation. Visuals therefore reflected the complete dataset.

These steps ensured that the quantitative analysis was transparent, reliable, and fully representative of the consultation data.

The full quantitative methodology is provided in Appendix (section 2.2 Methodology - Quantitative analysis).

### **3.3.2 Qualitative methodology**

The qualitative analysis was designed to be as rigorous as possible within the project constraints of limited time and high volume: 7 qualitative questions × 2,307 responses (≈16,149 free text answers). To maximise validity and reliability at this scale, the work was structured at three levels. Rigour covered the processes followed to ensure validity and reliability, aligned with Braun and Clarke’s framework and applied consistently across teams. Analysis referred to the systematic coding and theming of every answer conducted line by line. Nuance and narratives meant identifying the richness beyond counts through the creation of “hypotheses for the narratives”.

#### **Inductive vs deductive**

The analysis combined deductive and inductive approaches. Draft codes were created using MHCLG criteria for Local Government reorganisation, a PESTLE framework, and an early cut of responses, but these were treated as provisional. New codes were introduced inductively where the data required, ensuring findings reflected what respondents actually said.

#### **Code generation and refinement**

AI was used once for an initial categorisation against the draft framework, with all outputs manually reviewed line by line. Analysts refined definitions through regular discussions and sample checks, updating the code lists to capture meaning accurately. Flexibility was maintained so that codes could differ between question sets if required. Due to time pressures, full double-coding of all responses was not possible, though consistency was safeguarded through team calibration.



**Systematic line-by-line coding**

Analysis was carried out by two teams: one focused on option-based responses and the other on stand-alone questions. Every response was read line by line, with multiple codes applied where necessary to retain richness. For option-based questions, codes were also labelled positive or negative in relation to the option.

**Narrative construction and validation**

Analysts recorded notes of emerging nuance during coding, which were developed into hypotheses for narratives. Draft narratives were tested in team discussions, with analysts challenging each other and using evidence such as frequency counts and quotes to decide which clusters of notes should become narratives. These drafts were then tested against the raw data and refined into final narratives. Narratives were drawn only from the data, with less common points not elevated, and Q15 was reviewed for new insights rather than fully coded. This process ensured that the narratives reported were firmly grounded in the data and transparently connected back to the original responses.

**Cross-checks for validity and reliability**

In addition, several safeguards were built in to strengthen validity and reliability:

- **Controlled use of AI:** AI assisted only with initial categorisation; all coding decisions were checked manually against agreed definitions.
- **Team separation and naming:** the options team and the stand-alone questions team ensured consistent application within each dataset.
- **Line by line manual coding:** every response was individually assessed; multiple codes captured richness.
- **Golden copy and working copies:** an untouched master dataset was preserved; all preparation occurred on duplicates.
- **Inclusive coding rule:** non-responses were not coded; otherwise, all answers were retained. No flagging or exclusion of 'outliers' or 'contradictory' responses.
- **Cross-team sample checks:** each team reviewed a subset of the other team's coding to test consistency.
- **Consistency with flexibility:** reliability was checked through discussions, sample reviews, and cross-team comparison; definitions sometimes differed between questions to avoid forcing responses into codes that did not fit.
- **Ongoing calibration:** frequent team discussions supported consistent interpretation and reduced subjectivity.
- **Iterative refinement:** codes and themes were updated as the data required; nothing was forced to fit the initial framework.
- **Narratives and counts compared:** narratives were checked against code frequencies across all seven questions to confirm alignment between qualitative insight and quantitative counts.
- **Traceability:** every narrative and summary links back through themes and codes to the original responses.

- **Respect for question intent:** during final consolidation, common ground was noted without erasing question-specific differences.

This combination of deductive structure, inductive openness, controlled AI use, systematic human checking, and explicit traceability was chosen to maximise validity and reliability while preserving the authenticity and richness of respondents' views.

The full qualitative methodology is provided in Appendix, section 2.3 (Methodology - Qualitative Analysis).

### 3.3.3 Integration of Qualitative coding with the survey dataset

Once qualitative coding was complete, the coded responses were systematically re-integrated with the survey data to enable triangulation and deeper insight. This process ensured that themes and codes could be analysed not only in isolation but also in relation to response scores and respondent demographics. In total, over 16,000 coded lines were linked back to 2,307 response records.

A key technical challenge was to “flatten” the coded responses into a single row per respondent, allowing direct alignment with the survey data. This was achieved through the unique ID field, which was present in both the golden dataset and the coded qualitative dataset supplied to analysts. Flattening ensured that multiple codes per respondent could be aggregated and represented consistently, without losing the richness of the survey data.

The full integration of the quantitative and qualitative data methodology is provided in Appendix, section 2.4 (Methodology - Integration of qualitative coding with the survey dataset).

### 3.4 Assumptions and Limitations

There were a number of assumptions that were made throughout the analysis and limitations due to both the structure of the survey itself and the process of analysis. These are summarised below and the full discussion of limitations, including how they were managed, is provided in Appendix, section 2.5 (Assumptions and limitations).

#### Structure of the survey

##### **1. Duplicate submissions**

The survey only captures the primary relationship of the responder with the council and the city. Duplicate submissions may be submitted from individuals skewing the results.

##### **2. Optional questions**

All questions are optional resulting in an incomplete data set, threshold for accepting incomplete responses was therefore low and all responses were considered.

##### **3. Human error in answering questions**

For example, misreading scale, changing your relationship lens as you complete the survey (e.g. from a resident to a council member of staff)

#### Analysis

##### **4. Time constraints, team-based division of labour**

The volume of responses and tight timetable limited the extent of double-coding across all questions. Work was divided between two teams, which supported consistency within each stream but meant no single analyst reviewed the entire dataset. Question 15 (“Further comments”) was read line by line to capture new insights but not fully coded, so quantitative comparisons are limited.

##### **5. Bias / human margin for error or inconsistency**

As with all qualitative analysis, interpretation involves subjectivity. Steps such as line-by-line coding, sample reviews, team discussions, and final consolidation reduced individual bias, but they cannot eliminate it entirely. Minor differences in interpretation may also occur if repeated by another team.

##### **6. Deductive method**

The coding began with a deductive framework based on MHCLG criteria for Local Government reorganisation, PESTLE, and early responses. While this provided structure, it may have shaped initial thinking before inductive refinement was applied.

##### **7. Use of AI tooling**

An AI tool was used once for an initial organising pass to manage scale. All responses were subsequently reviewed manually, but the involvement of AI still introduces some risk of misclassification compared with wholly manual coding.

##### **8. Loss of detailed nuance through narrative construction and summarising**

Narratives were designed to reflect the most common and important issues, meaning points raised by only a small number of respondents were not elevated. This ensured findings represented broader patterns but reduced visibility of minority perspectives.

Safeguards such as line-by-line coding, cross-team discussion, iterative refinement, and explicit traceability reduced risks and increased reliability. However, these measures did



not eliminate the limitations, which should still be considered when interpreting the findings.

#### Data handling procedures

#### **Potential limitations in data handling**

##### **1. Duplicate submissions retained**

- By design, duplicates were not identified or removed, since respondents may have multiple roles.
- Limitation: this may slightly inflate counts if some individuals submitted multiple times without disclosing separate perspectives.

##### **2. Incomplete responses included**

- All partial responses were retained.
- Limitation: some analyses may be based on smaller denominators, which could affect comparability across questions.

##### **3. Nonsensical or protest data retained**

- Inclusive coding meant no subjective exclusions.
- Limitation: while this avoided bias, it may reduce precision where irrelevant entries were included in counts.

##### **4. Discrepancies in reconciliation (Q5 and Q6)**

- Around 178 records were not fully reconciled.
- Limitation: this could marginally affect demographic linkage or coding completeness, though not overall patterns.

##### **5. Manual processes**

- Some checks (Excel filtering, manual coding) involved human handling.
- Limitation: introduces a small margin for human error, despite audit trail and validation.

## 4. Findings

### 4.1 Demographic data

The survey was published online as part of a month-long public engagement exercise aimed at the local community within Brighton & Hove (B&H). A total of 2283 online responses and 24 physical responses were received.

Question 1 asked respondents what their relationship with the council was and how they were responding to the survey. The spread of responses is shown below, with the highest proportion of responses from non-residents of Brighton & Hove.

<b>Question 1 - Relationship with the council</b>	<b>Number of responses</b>	<b>% of total responses</b>
Resident of BHCC	717	31%
Non-resident of BHCC	1344	58%
Council employee, public sector stakeholder, local business, local charity or voluntary organisation	132	6%
No answer / other selected	114	5%
<b>Total</b>	<b>2307</b>	<b>100%</b>

Question 2 asked respondents to provide their postcode and this data was used to more accurately map all responses into three categories:

1. Residents - wards within Brighton & Hove
2. Non-residents - wards outside of Brighton & Hove
3. Unknown - where no postcode was provided or partially provided and we were unable to map the location to a ward.

This mapping has been used to triangulate and segment responses to other questions throughout this analysis, wherever the data is split by residents and non-residents.

A series of equalities questions (Q15 - Q23) were asked as part of the survey to capture the demographics around age, gender, sexuality, ethnicity and disability of respondents. This data is provided in the Appendix section 1.1.2 (About you and demographic data).

## 4.2 Service usage and what matters to respondents

Questions 3 and 4 asked respondents about the services that they use both in Brighton & Hove and in other areas. A summary of responses is provided below as well as pie charts later in this section.

<i>Question 3 - Which of the following Brighton &amp; Hove services have you used in the last 12 months?</i>	% of respondents who use each service, by demographic		
	All	B&H Residents	Non-residents
Bus or transport network	33%	28%	39%
Children's or youth services	2%	3%	2%
Council housing or homelessness advice	2%	2%	1%
Libraries or cultural venues	16%	21%	11%
Mental health support in schools	1%	1%	1%
Parks and seafront	25%	27%	21%
Public health like health checks or vaccinations	13%	17%	9%
None of the above	7%	0%	15%

Respondents highlighted frequent use of Brighton & Hove's transport network and outdoor spaces, particularly the parks and seafront. Local residents reported drawing on a wider range of services, including parks, the seafront, libraries, cultural venues, and public health provision, while non-residents tended to focus mainly on transport and outdoor amenities. A larger proportion of non-residents stated they did not use any of the services listed.

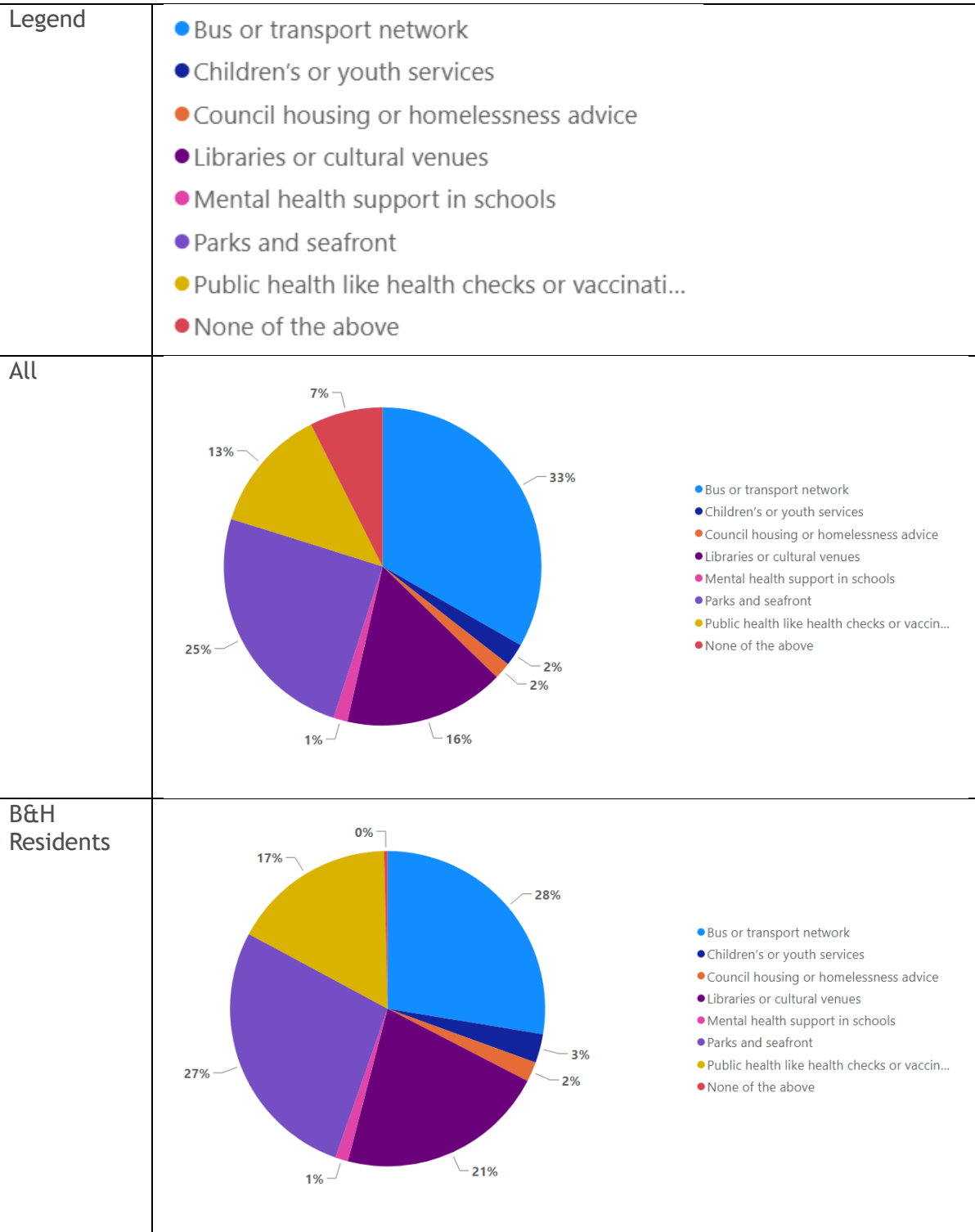
<i>Question 4 - Do you use similar services in other areas?</i>	Response, by demographic		
	All	B&H Residents	Non-residents
Yes	49%	17%	69%
No	27%	65%	9%
Not stated	21%	16%	19%
Don't know / not sure	3%	3%	2%

When asked about using similar services in other areas, Brighton & Hove residents generally indicated that they rely mainly on local provision, with few looking elsewhere. In contrast, non-residents were much more likely to make use of equivalent services in their own or other locations.

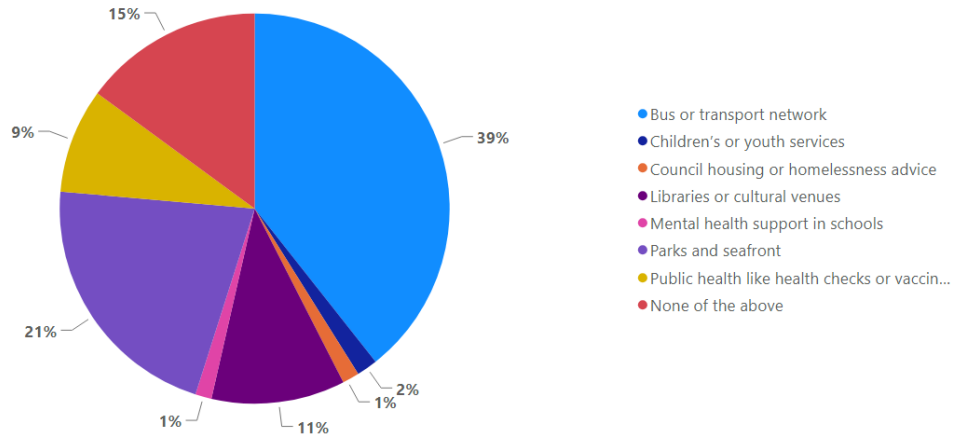
Overall, the findings suggest that residents and non-residents interact with Brighton & Hove services in very different ways. Local residents depend on a broad range of services within the city and are less inclined to seek alternatives elsewhere. Non-residents, on the other hand, mainly use transport and outdoor amenities when visiting, while continuing to access most other services in their own areas. This highlights Brighton & Hove's role as both a provider of essential services for its residents and a gateway destination for visitors, with transport and public spaces acting as the primary points of connection.



**Question 3 - Which of the following Brighton & Hove services have you used in the last 12 months?**



Non-B&H residents

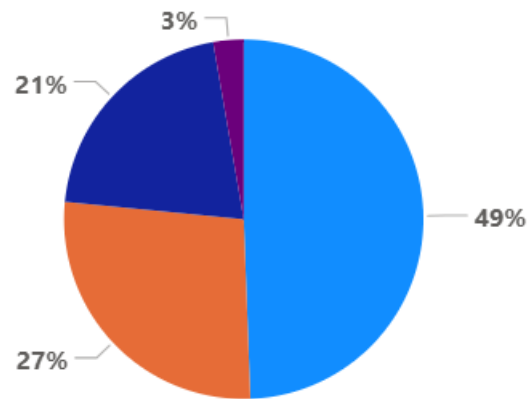


**Question 4 - Do you use similar services in other areas?**

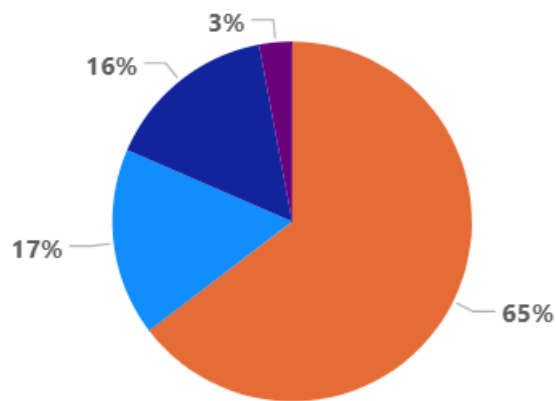
Legend

● Yes ● No ● Not Stated ● Don't know / not sure

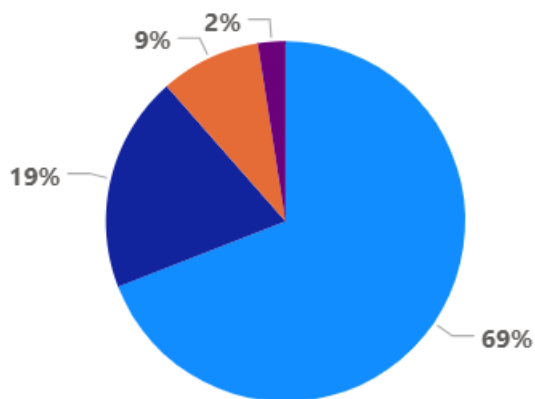
All



B&H Residents



Non-B&H residents





Questions 5 and 6 asked respondents broader, open questions about what mattered most to them - the things they want to preserve and protect and the things they are concerned about through reorganisation. Respondents answered with free text which was coded to count how many times key topics were mentioned. This is shown in the tables below. Section 4.4 provides the narrative that sits alongside this thematic analysis, drawing out nuances of the comments.

**Question 5 - If change does happen and your areas becomes part of a merged larger council, what would be most important to protect or preserve?**

Table below shows count of number of times each code was mentioned across all responses.

All	Code	Civic pride	Economic	Expansion proposals	Political	Service	Total
	Service performance					626	626
	Local identity/community/culture	610					610
	Trust in BHCC/competence				298		298
	Opposition to expansion			263			263
	Parks/green space/coastline					258	258
	Transport/traffic					246	246
	Representation				192		192
	Health and care					149	149
	Housing delivery targets		143				143
	Education					119	119
	Waste					111	111
	Access/distance to services					108	108
	Financial efficiency/value for money		81				81
	Tax/council tax		50				50
	Employment/economic growth		49				49
	Infrastructure		43				43
	Least disruption/status quo			39			39
	Support for expansion			27			27
	Social needs of demographic	7					7
	Not enough benefits/info			6			6
	Funding/resources required		5				5
	Ability to meet community needs					4	4
	Offers alternative			3			3
	Deprivation	2					2
	<b>Total</b>	<b>619</b>	<b>371</b>	<b>338</b>	<b>490</b>	<b>1621</b>	<b>3439</b>

B&H Residents	Code	Civic pride	Economic	Expansion proposals	Political	Service	Total
	Service performance					213	213
	Local identity/community/culture	190					190
	Trust in BHCC/competence				78		78
	Transport/traffic					76	76
	Representation				62		62
	Health and care					59	59
	Parks/green space/coastline					54	54
	Opposition to expansion			51			51
	Access/distance to services					36	36
	Financial efficiency/value for money		36				36
	Housing delivery targets		36				36
	Education					31	31
	Waste					21	21
	Employment/economic growth		17				17
	Support for expansion			17			17
	Infrastructure		13				13
	Least disruption/status quo			13			13
	Tax/council tax		8				8
	Social needs of demographic	4					4
	Offers alternative			3			3
	Ability to meet community needs					1	1
	Not enough benefits/info			1			1
	<b>Total</b>	<b>194</b>	<b>110</b>	<b>85</b>	<b>140</b>	<b>491</b>	<b>1020</b>
Non-B&H Residents	Code	Civic pride	Economic	Expansion proposals	Political	Service	Total
	Local identity/community/culture	345					345
	Service performance					317	317
	Trust in BHCC/competence				188		188
	Opposition to expansion			172			172
	Parks/green space/coastline					168	168
	Transport/traffic					131	131
	Representation				112		112
	Housing delivery targets		82				82
	Waste					78	78
	Education					73	73
	Health and care					71	71
	Access/distance to services					59	59
	Financial efficiency/value for money		36				36
	Tax/council tax		34				34
	Employment/economic growth		26				26
	Infrastructure		26				26
	Least disruption/status quo			19			19
	Support for expansion			8			8
	Funding/resources required		5				5
	Not enough benefits/info			3			3
	Ability to meet community needs					2	2
	Deprivation	1					1
	Social needs of demographic	1					1
	<b>Total</b>	<b>347</b>	<b>209</b>	<b>202</b>	<b>300</b>	<b>899</b>	<b>1957</b>

**Question 6 - What concerns, if any, do you have about how local councils will change through reorganisation?**

Table below shows count of number of times each code was mentioned across all responses.

All	Code	Civic pride	Economic	Expansion proposals	Geography & Environment	Political	Service	Total
	Representation and accountability to communities					521		521
	Service performance and workforce issues						366	366
	Trust and competence in Brighton's leadership					338		338
	Identity, culture, and politics	248						248
	Ability to meet community needs						204	204
	Financial costs, efficiency, and value for money		183					183
	Funding, resources, and cuts		127					127
	Pressure on existing services						92	92
	Housing and buildings development		83				1	84
	Area too big				81			81
	Support/no concerns for reorganisation			68				68
	Council tax and charges		66					66
	Waste						63	63
	Transport/traffic						61	61
	Employment/economic growth		56					56
	Environmental impact				51			51
	Lack of benefits and information			43				43
	Social needs and vulnerable groups	39						39
	Boundaries				36			36
	Opposition to expansion			33				33
	Access/distance to services						30	30
	Infrastructure		29					29
	Offers alternative			29				29
	Area too small				22			22
	Least disruption/ Status quo			18				18
	Deprivation	17						17
	Education						16	16
	Housing						16	16
	Health and care						15	15
	<b>Total</b>	<b>304</b>	<b>545</b>	<b>208</b>	<b>191</b>	<b>863</b>	<b>869</b>	<b>2980</b>
B&H Resident s	Code	Civic pride	Economic	Expansion proposals	Geography & Environment	Political	Service	Total
	Representation and accountability to communities					129		129
	Service performance and workforce issues						115	115
	Trust and competence in Brighton's leadership					63		63
	Funding, resources, and cuts		59					59
	Identity, culture, and politics	54						54
	Pressure on existing services						50	50
	Support/no concerns for reorganisation			50				50
	Financial costs, efficiency, and value for money		47					47
	Employment/economic growth		26					26
	Ability to meet community needs						25	25
	Area too big				25			25
	Lack of benefits and information			17				17
	Social needs and vulnerable groups	16						16
	Council tax and charges		14					14
	Access/distance to services						11	11
	Housing and buildings development		10				1	11
	Offers alternative			10				10
	Waste						10	10
	Boundaries				9			9
	Area too small				7			7
	Environmental impact				7			7
	Deprivation	6						6
	Opposition to expansion			6				6
	Health and care						5	5
	Infrastructure		4					4
	Least disruption/ Status quo			4				4
	Transport/traffic						4	4
	As/all above			2			1	3
	Education						2	2
	<b>Total</b>	<b>76</b>	<b>160</b>	<b>90</b>	<b>49</b>	<b>192</b>	<b>227</b>	<b>794</b>



Non-B&H Resident S	Code	Civic pride	Economic	Expansion proposals	Geography & Environment	Political	Service	Total
	Representation and accountability to communities					323		323
	Trust and competence in Brighton's leadership					218		218
	Service performance and workforce issues						205	205
	Identity, culture, and politics	170						170
	Ability to meet community needs						157	157
	Financial costs, efficiency, and value for money		106					106
	Housing and buildings development		62					62
	Transport/traffic					47		47
	Waste					46		46
	Area too big				42			42
	Council tax and charges		41					41
	Funding, resources, and cuts		41					41
	Environmental impact				38			38
	Boundaries				23			23
	Opposition to expansion			23				23
	Pressure on existing services					22		22
	Employment/economic growth		21					21
	Infrastructure		21					21
	Lack of benefits and information			20				20
	Social needs and vulnerable groups	20						20
	Access/distance to services						16	16
	Offers alternative			15				15
	Education						13	13
	Support/no concerns for reorganisation			13				13
	Area too small				12			12
	Housing						12	12
	Least disruption/ Status quo			11				11
	As/all above			7				7
	Deprivation	6						6
	<b>Total</b>	<b>196</b>	<b>293</b>	<b>93</b>	<b>115</b>	<b>545</b>	<b>524</b>	<b>1766</b>

## 4.3 Options

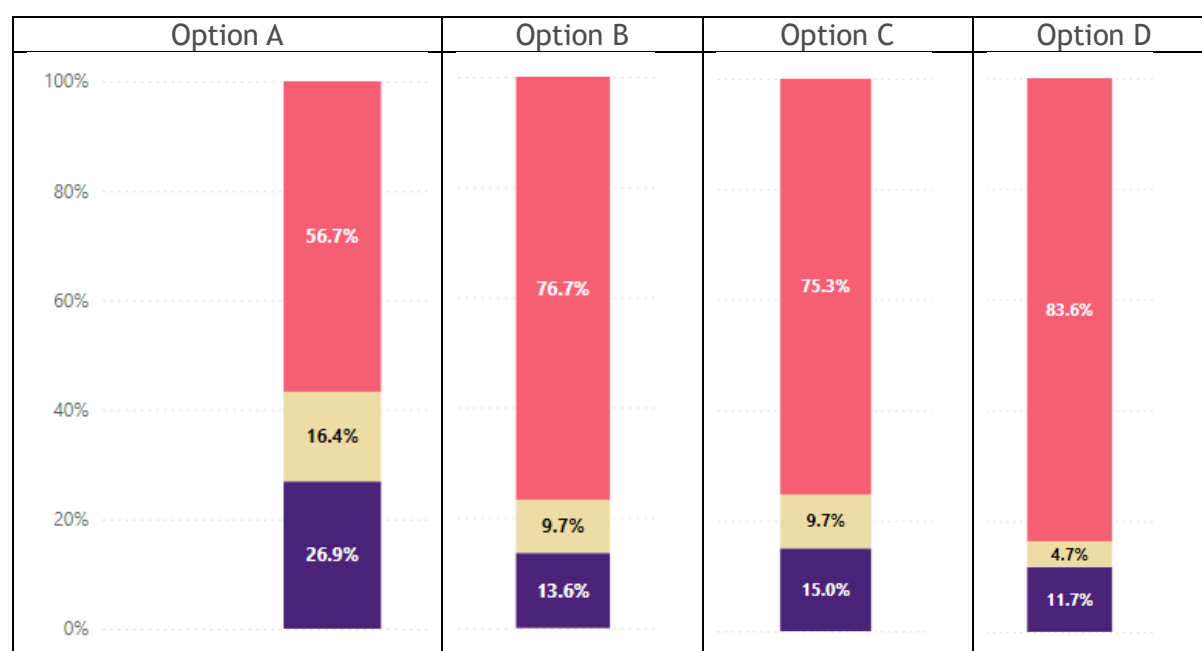
Questions 7-14 asked respondents for their opinions on four options for expansion (options A, B, C and D shown in section 2 of this report).

Questions 7, 9, 11 and 13 asked respondents to score the extent to which the support or oppose each option using a scale of: 1 (Strongly support) - 5 (Strongly oppose). For the purposes of presenting this data, we have assumed that a score of 1 or 2 demonstrates support, a score of 3 is neutral, and a score of 4 or 5 demonstrates opposition.

A colour legend has been applied to all charts which show this data:

Legend:	<span style="color: purple;">●</span> (1-2) Support	<span style="color: gold;">●</span> (3) Neutral	<span style="color: red;">●</span> (4-5) Oppose
---------	---	---	---

Below is the summary of the scores given to each option by the full set of respondents. Whilst the majority of respondents are in opposition to all options, you can see that option A had the most support and option D has the least support overall.



By using the data collected around post codes of respondents, we have also broken down the spread of support vs opposition by Brighton & Hove residents and non-resident groups and shown on maps, the average score of respondents within different wards.

There are limitations to the data presented in maps or split by grouping of resident / non-resident. Whilst 90% of respondents provided a postcode, 6% of responses were invalid or incomplete so the data that is presented by ward (maps) and resident / non-resident categories only represents 83.5% of total responses. There were also a minority number of respondents from wards outside the map area shown in this report which will not be seen on the maps. It is also important to remember that the maps show spread of responses and the average score by ward, and does not account for density of responses i.e. if there is a single respondent from a ward, their score will determine the average score for that

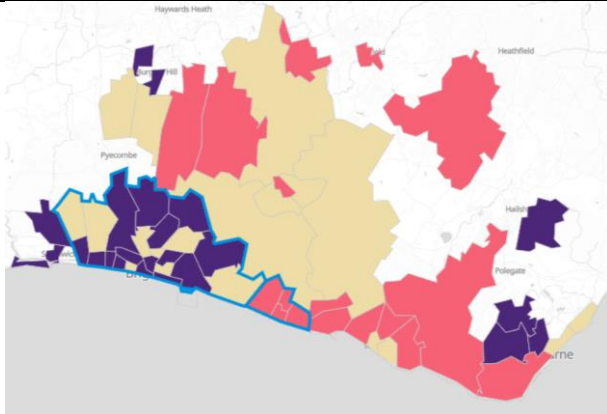
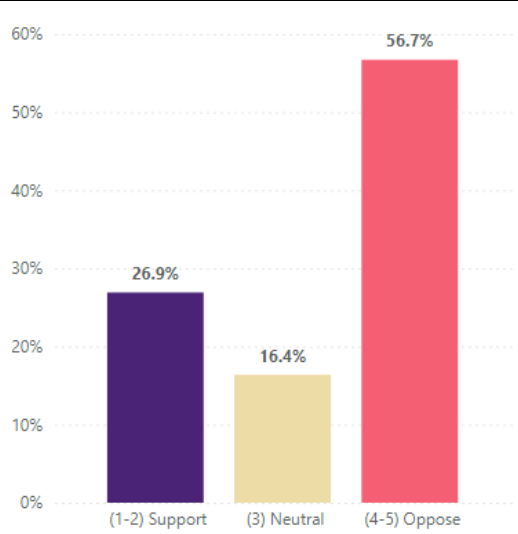
entire ward. See the table below for an overview of the number of responses captured from each Local Authority (as the list of wards would be an exhaustive list).

Local Authority	# Responses	% of Total
Lewes	1219	53%
Brighton and Hove	676	29%
Not Stated	230	10%
Postcode invalid/incomplete	149	6%
Mid Sussex	7	0%
Eastbourne	6	0%
Wealden	6	0%
Adur	5	0%
Worthing	4	0%
Chichester	2	0%
Hastings	1	0%
Rother	1	0%
Wandsworth	1	0%
<b>Total</b>	<b>2307</b>	<b>100%</b>

In addition to the quantitative data, questions 8, 10, 12 and 14 asked respondents to provide a reason for their score. The free text answers to these questions were coded in order to count how many times key topics were mentioned and look for common themes. Key data around the most common topics mentioned (by resident/non-resident demographic and by supporters/opposers to the options) is presented here alongside the scoring data. Exclusions from the lists are: topics that are mentioned fewer than 10 times or the topic code 'no clear reasoning'. Further narrative around the common themes and nuances is given in section 4.4.



**Question 7 and 8 - To what extent do you support or oppose option A: strengthening the eastern edge. Provide your reasons.**

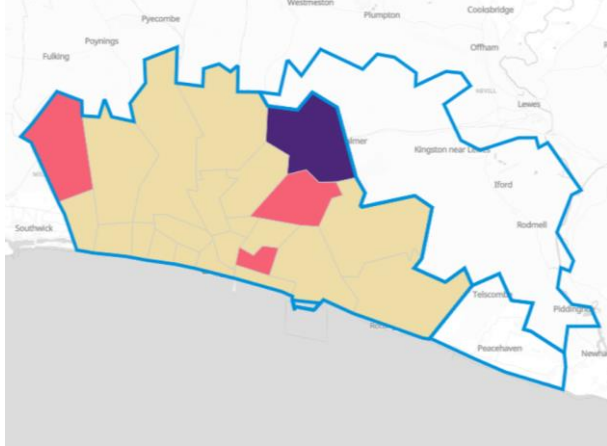
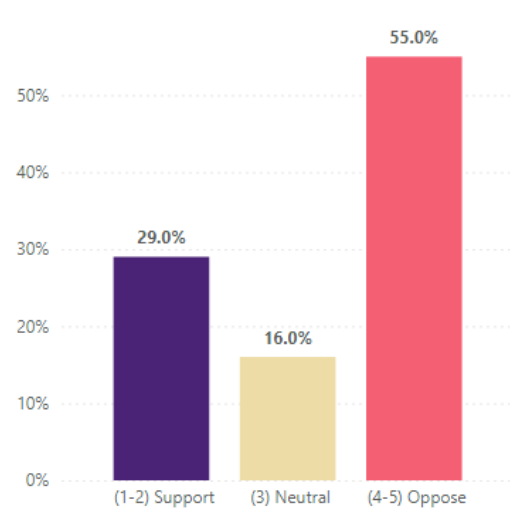
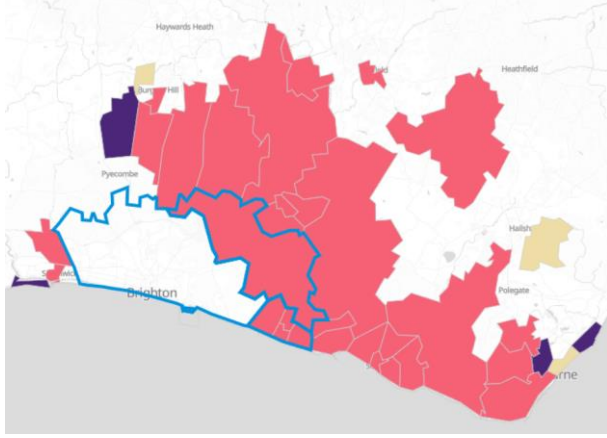
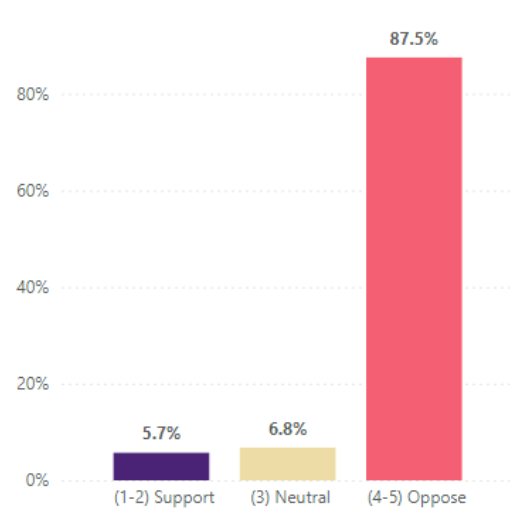
Legend: <div><div></div> (1-2) Support</div> <div><div></div> (3) Neutral</div> <div><div></div> (4-5) Oppose</div>											
OPTION A	Map showing average score by ward	Average option scores	Key topics from comments (# comments)								
All respondents		 <table><thead><tr><th>Option</th><th>Percentage</th></tr></thead><tbody><tr><td>(1-2) Support</td><td>26.9%</td></tr><tr><td>(3) Neutral</td><td>16.4%</td></tr><tr><td>(4-5) Oppose</td><td>56.7%</td></tr></tbody></table>	Option	Percentage	(1-2) Support	26.9%	(3) Neutral	16.4%	(4-5) Oppose	56.7%	<p>Top 5 overall:</p> <ul style="list-style-type: none"><li>Local identity and brand (343)</li><li>General opposition (145)</li><li>Area too big (134)</li><li>Trust in BHCC, competence (120)</li><li>Area too small (102)</li></ul>
Option	Percentage										
(1-2) Support	26.9%										
(3) Neutral	16.4%										
(4-5) Oppose	56.7%										

B&H residents		<table><thead><tr><th>Response</th><th>Percentage</th></tr></thead><tbody><tr><td>(1-2) Support</td><td>49.3%</td></tr><tr><td>(3) Neutral</td><td>17.6%</td></tr><tr><td>(4-5) Oppose</td><td>33.0%</td></tr></tbody></table>	Response	Percentage	(1-2) Support	49.3%	(3) Neutral	17.6%	(4-5) Oppose	33.0%	<p>Top 5 for supporters:</p> <ul style="list-style-type: none"><li>Local identity and brand (51)</li><li>General support (41)</li><li>Area too small (33)</li><li>Least disruption, status quo (33)</li><li>Boundaries (16)</li></ul> <p>Top 5 for opposers:</p> <ul style="list-style-type: none"><li>Local identity and brand (29)</li><li>Area too small (23)</li><li>Trust in BHCC, competence (23)</li><li>Area too big (22)</li><li>General opposition (20)</li></ul>
Response	Percentage										
(1-2) Support	49.3%										
(3) Neutral	17.6%										
(4-5) Oppose	33.0%										
Non-B&H residents		<table><thead><tr><th>Response</th><th>Percentage</th></tr></thead><tbody><tr><td>(1-2) Support</td><td>15.6%</td></tr><tr><td>(3) Neutral</td><td>16.0%</td></tr><tr><td>(4-5) Oppose</td><td>68.4%</td></tr></tbody></table>	Response	Percentage	(1-2) Support	15.6%	(3) Neutral	16.0%	(4-5) Oppose	68.4%	<p>Top 5 for supporters:</p> <ul style="list-style-type: none"><li>Local identity and brand (31)</li><li>General support (26)</li></ul> <p>Top 5 for opposers:</p> <ul style="list-style-type: none"><li>Local identity and brand (161)</li><li>General opposition (89)</li><li>Area too big (76)</li><li>Trust in BHCC, competence (75)</li><li>Service performance (40)</li></ul>
Response	Percentage										
(1-2) Support	15.6%										
(3) Neutral	16.0%										
(4-5) Oppose	68.4%										
Conclusion	<ul style="list-style-type: none"><li>Option A had the most support of the four options</li></ul>										

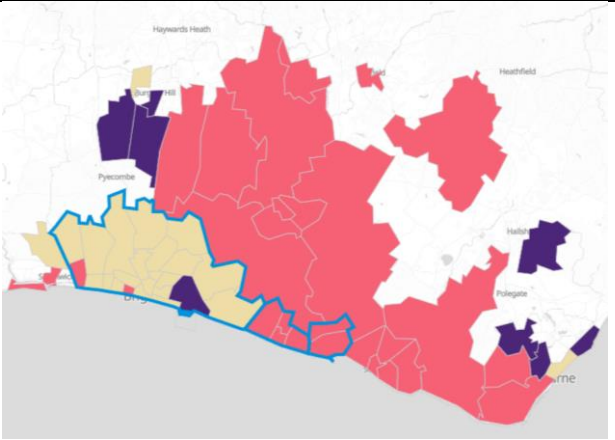
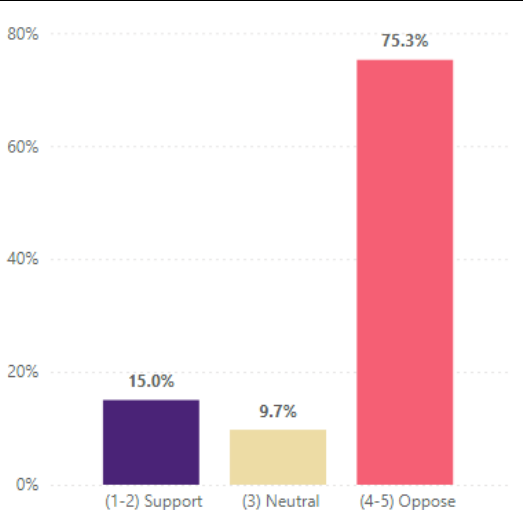
	<ul style="list-style-type: none"> <li>• Brighton &amp; Hove residents made up the majority of this with more in favour than opposing (this is the only option for which this is the case). However, Residents of the proposed expansion areas were opposed to the proposal</li> <li>• Local identity was the key topic as for the entire qualitative data set but there were a high number of comments about the positive links between Brighton and the expansion area (East Saltdean, Telscombe Cliffs and Peacehaven) and reuniting Saltdean</li> <li>• Supporters had mixed views about the new area being the right size (causing the least disruption and retaining natural links) or not being ambitious enough to warrant the upheaval</li> <li>• The majority of opposition came from non-residents of Brighton &amp; Hove and the average scores of those respondents from within the expansion areas were in opposition. Key concerns were around BHCC's ability to maintain and deliver a high level of service to the new areas, or new areas becoming subsumed in a larger area and losing their identity or being deprioritised.</li> </ul>
--	---



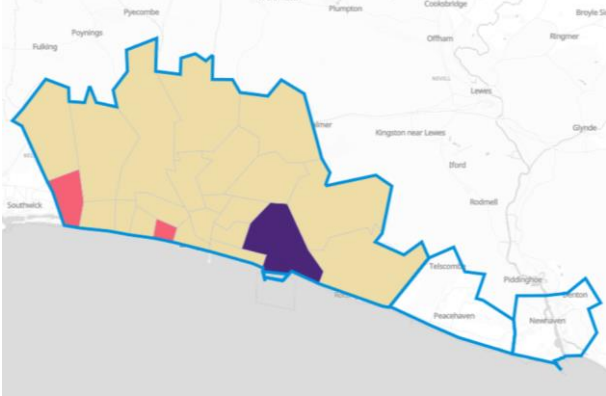
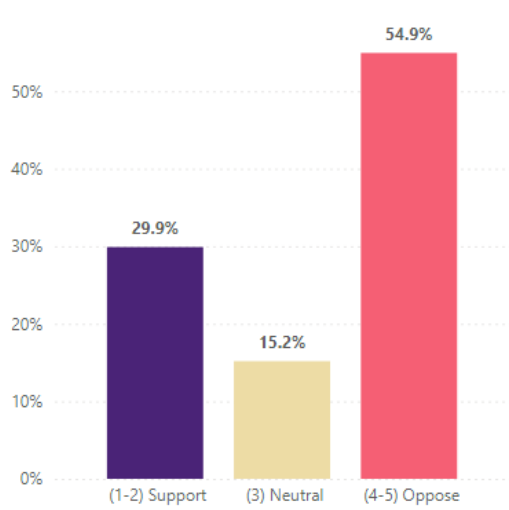
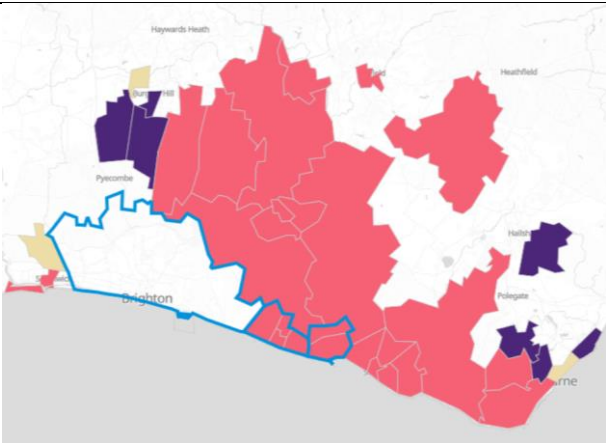
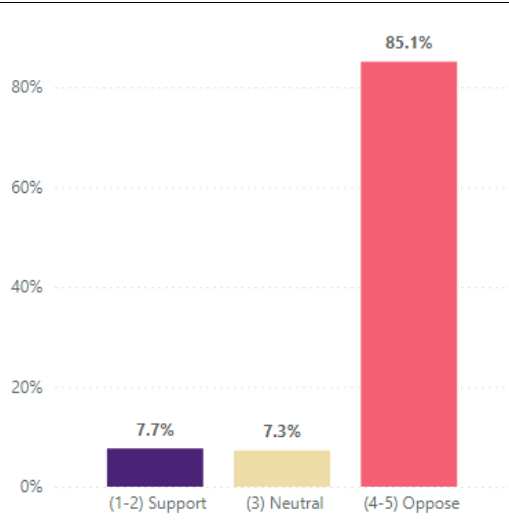
Question 9 and 10 - To what extent do you support or oppose option B: extending to the eastern downs. Provide your reasons.			
Legend: <div><div></div> (1-2) Support</div> <div><div></div> (3) Neutral</div> <div><div></div> (4-5) Oppose</div>			
OPTION B	Map showing average score by ward	Average option scores	Key topics from comments (# comments)
All respondents			

B&H residents		 <table><tr><th>Response</th><th>Percentage</th></tr><tr><td>(1-2) Support</td><td>29.0%</td></tr><tr><td>(3) Neutral</td><td>16.0%</td></tr><tr><td>(4-5) Oppose</td><td>55.0%</td></tr></table>	Response	Percentage	(1-2) Support	29.0%	(3) Neutral	16.0%	(4-5) Oppose	55.0%	<p>Top 5 for supporters:</p> <ul style="list-style-type: none"><li>Local identity and brand (19)</li><li>General support (18)</li><li>Area too small (14)</li><li>Area too big (11)</li><li>Boundaries (11)</li></ul> <p>Top 5 for opposers:</p> <ul style="list-style-type: none"><li>Local identity and brand (75)</li><li>Area too big (73)</li><li>General opposition (31)</li><li>Trust in BHCC, competence (23)</li><li>Service performance (19)</li></ul>
Response	Percentage										
(1-2) Support	29.0%										
(3) Neutral	16.0%										
(4-5) Oppose	55.0%										
Non-B&H residents		 <table><tr><th>Response</th><th>Percentage</th></tr><tr><td>(1-2) Support</td><td>5.7%</td></tr><tr><td>(3) Neutral</td><td>6.8%</td></tr><tr><td>(4-5) Oppose</td><td>87.5%</td></tr></table>	Response	Percentage	(1-2) Support	5.7%	(3) Neutral	6.8%	(4-5) Oppose	87.5%	<p>Top 5 for supporters:</p> <ul style="list-style-type: none"><li>No topics mentioned 10+ times</li></ul> <p>Top 5 for opposers:</p> <ul style="list-style-type: none"><li>Local identity and brand (285)</li><li>Area too big (140)</li><li>General opposition (115)</li><li>Trust in BHCC, competence (82)</li><li>Service performance (57)</li></ul>
Response	Percentage										
(1-2) Support	5.7%										
(3) Neutral	6.8%										
(4-5) Oppose	87.5%										
Conclusion	<ul style="list-style-type: none"><li>Option B was opposed in the majority with a small portion of supporters who were mainly Brighton &amp; Hove residents. Note that scores for Option B were very closely aligned to scores for Option C</li><li>Residents of the proposed expansion areas were opposed to the proposal</li></ul>										

	<ul style="list-style-type: none"> <li>• Opposers argued that the area is too big and there is a lack of shared identity between the city, coastal and rural areas included</li> <li>• There was a concern that service performance would be impacted with BHCC not able to meet the needs of these new and different communities due to a lack of ability, experience and resources</li> <li>• Opposers shared concerns about the natural areas within the expansion areas being used for housing and development and demonstrated distrust in BHCC's motives for the expansion</li> <li>• Supporters noted that a large area was necessary in order to deliver impactful change</li> </ul>
--	--

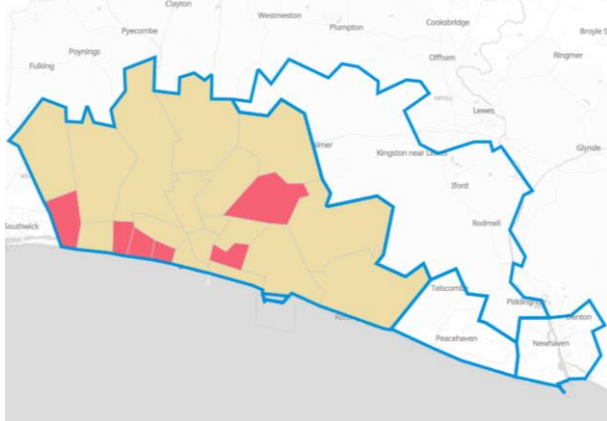
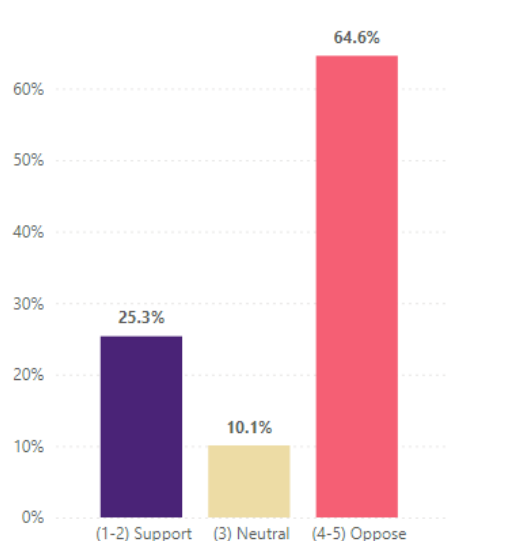
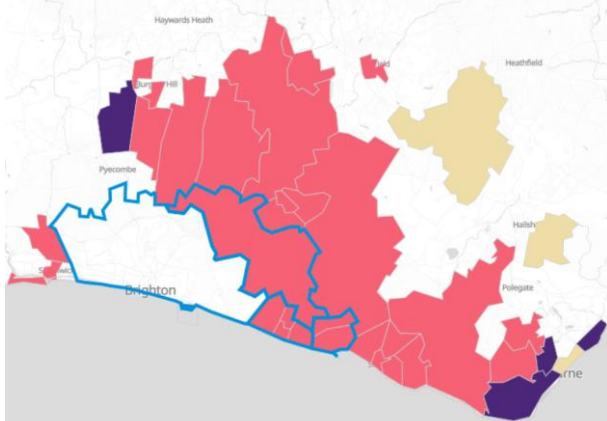
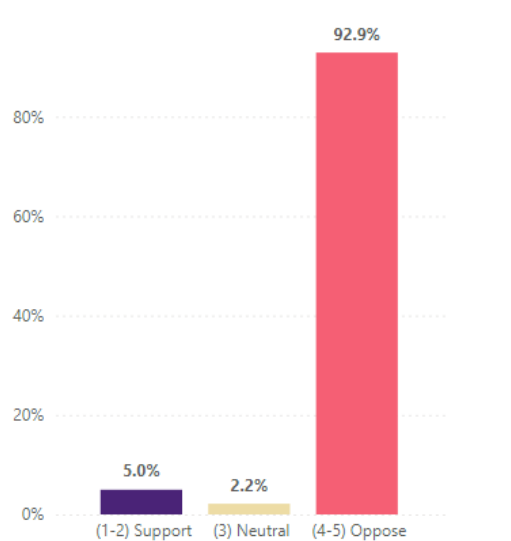
Question 11 and 12 - To what extent do you support or oppose option C: uniting the coastal corridor. Provide your reasons.											
Legend: <div><div></div> (1-2) Support</div> <div><div></div> (3) Neutral</div> <div><div></div> (4-5) Oppose</div>											
OPTION C	Map showing average score by ward	Average option scores	Key topics from comments (# comments)								
All respondents		 <table><thead><tr><th>Support Level</th><th>Percentage</th></tr></thead><tbody><tr><td>(1-2) Support</td><td>15.0%</td></tr><tr><td>(3) Neutral</td><td>9.7%</td></tr><tr><td>(4-5) Oppose</td><td>75.3%</td></tr></tbody></table>	Support Level	Percentage	(1-2) Support	15.0%	(3) Neutral	9.7%	(4-5) Oppose	75.3%	Top 5 overall: <ul style="list-style-type: none"><li>Local identity and brand (457)</li><li>Area too big (250)</li><li>General opposition (189)</li><li>Trust in BHCC, competence (125)</li><li>Service performance (101)</li></ul>
Support Level	Percentage										
(1-2) Support	15.0%										
(3) Neutral	9.7%										
(4-5) Oppose	75.3%										



B&H residents		 <table><tr><th>Response</th><th>Percentage</th></tr><tr><td>(1-2) Support</td><td>29.9%</td></tr><tr><td>(3) Neutral</td><td>15.2%</td></tr><tr><td>(4-5) Oppose</td><td>54.9%</td></tr></table>	Response	Percentage	(1-2) Support	29.9%	(3) Neutral	15.2%	(4-5) Oppose	54.9%	<p>Top 5 for supporters:</p> <ul style="list-style-type: none"><li>Local identity and brand (27)</li><li>Transport / traffic (18)</li><li>General support (17)</li><li>Boundaries (10)</li><li>Connecting services (10)</li></ul> <p>Top 5 for opposers:</p> <ul style="list-style-type: none"><li>Local identity and brand (84)</li><li>Area too big (56)</li><li>General opposition (35)</li><li>Trust in BHCC, competence (18)</li><li>Service performance (18)</li></ul>
Response	Percentage										
(1-2) Support	29.9%										
(3) Neutral	15.2%										
(4-5) Oppose	54.9%										
Non-B&H residents		 <table><tr><th>Response</th><th>Percentage</th></tr><tr><td>(1-2) Support</td><td>7.7%</td></tr><tr><td>(3) Neutral</td><td>7.3%</td></tr><tr><td>(4-5) Oppose</td><td>85.1%</td></tr></table>	Response	Percentage	(1-2) Support	7.7%	(3) Neutral	7.3%	(4-5) Oppose	85.1%	<p>Top 5 for supporters:</p> <ul style="list-style-type: none"><li>Local identity and brand (16)</li></ul> <p>Top 5 for opposers:</p> <ul style="list-style-type: none"><li>Local identity and brand (265)</li><li>Area too big (137)</li><li>General opposition (110)</li><li>Trust in BHCC, competence (89)</li><li>Service performance (51)</li></ul>
Response	Percentage										
(1-2) Support	7.7%										
(3) Neutral	7.3%										
(4-5) Oppose	85.1%										
Conclusion	<ul style="list-style-type: none"><li>Option C was opposed in the majority with a small portion of supporters who were mainly Brighton &amp; Hove residents. Note that scores for Option C were very closely aligned to scores for Option B</li><li>Residents of the proposed expansion areas were opposed to the proposal</li></ul>										

	<ul style="list-style-type: none"> <li>• Opposers argued that the area is too big to maintain service levels across the whole footprint as the council would be serving too many people with distinct social needs</li> <li>• Responders also challenged whether the size of the area would stretch services thin and showed concern that service performance would dip from current levels for the existing residents</li> <li>• Supporters noted the common identity and needs of coastal areas in the proposed expansion area and the opportunities for connecting services along the coast</li> </ul>
--	---

Question 13 and 14 - To what extent do you support or oppose option D: coast and downs partnership, Provide your reasons.											
Legend: <div><div></div> (1-2) Support</div> <div><div></div> (3) Neutral</div> <div><div></div> (4-5) Oppose</div>											
OPTION D	Map showing average score by ward	Average option scores	Key topics from comments (# comments)								
All respondents		<table><thead><tr><th>Option Score</th><th>Percentage</th></tr></thead><tbody><tr><td>(1-2) Support</td><td>11.7%</td></tr><tr><td>(3) Neutral</td><td>4.7%</td></tr><tr><td>(4-5) Oppose</td><td>83.6%</td></tr></tbody></table>	Option Score	Percentage	(1-2) Support	11.7%	(3) Neutral	4.7%	(4-5) Oppose	83.6%	Top 5 overall: <ul style="list-style-type: none"><li>Local identity and brand (420)</li><li>Area too big (390)</li><li>General opposition (218)</li><li>Trust in BHCC, competence (125)</li><li>Service performance (108)</li></ul>
Option Score	Percentage										
(1-2) Support	11.7%										
(3) Neutral	4.7%										
(4-5) Oppose	83.6%										

B&H residents		 <table><tr><th>Response</th><th>Percentage</th></tr><tr><td>(1-2) Support</td><td>25.3%</td></tr><tr><td>(3) Neutral</td><td>10.1%</td></tr><tr><td>(4-5) Oppose</td><td>64.6%</td></tr></table>	Response	Percentage	(1-2) Support	25.3%	(3) Neutral	10.1%	(4-5) Oppose	64.6%	<p>Top 5 for supporters:</p> <ul style="list-style-type: none"><li>• General support (32)</li><li>• Local identity and brand (15)</li><li>• Financial efficiency, value for money (12)</li><li>• Area right size (11)</li><li>• Transport / traffic (11)</li></ul> <p>Top 5 for opposers:</p> <ul style="list-style-type: none"><li>• Area too big (120)</li><li>• Local identity and brand (69)</li><li>• General opposition (49)</li><li>• Service performance (26)</li><li>• Trust in BHCC, competence (20)</li></ul>
Response	Percentage										
(1-2) Support	25.3%										
(3) Neutral	10.1%										
(4-5) Oppose	64.6%										
Non-B&H residents		 <table><tr><th>Response</th><th>Percentage</th></tr><tr><td>(1-2) Support</td><td>5.0%</td></tr><tr><td>(3) Neutral</td><td>2.2%</td></tr><tr><td>(4-5) Oppose</td><td>92.9%</td></tr></table>	Response	Percentage	(1-2) Support	5.0%	(3) Neutral	2.2%	(4-5) Oppose	92.9%	<p>Top 5 for supporters:</p> <ul style="list-style-type: none"><li>• <i>No topics mentioned 10+ times</i></li></ul> <p>Top 5 for opposers:</p> <ul style="list-style-type: none"><li>• Local identity and brand (268)</li><li>• Area too big (188)</li><li>• General opposition (124)</li><li>• Trust in BHCC, competence (85)</li><li>• Service performance (55)</li></ul>
Response	Percentage										
(1-2) Support	5.0%										
(3) Neutral	2.2%										
(4-5) Oppose	92.9%										
Conclusion	<ul style="list-style-type: none"><li>• Option D had the least support overall, across both resident and non-resident groups</li></ul>										



	<ul style="list-style-type: none"> <li>• Residents of the proposed expansion areas were opposed to the proposal</li> <li>• The key reasons cited were that the expansion area is too big and lacks cohesive identity across the city and rural communities within it</li> <li>• There were concerns about the ability of a single council to meet the differing needs of these communities and landscapes from experience, ability and funding points of view</li> <li>• Opposers shared concerns about the natural areas within the expansion areas being used for housing and development and demonstrated distrust in BHCC's motives for the expansion</li> <li>• The small number of supporters were mainly Brighton &amp; Hove residents (though note that the map shows the average scores only and so shows that the Brighton &amp; Hove area is neutral overall) who commented on opportunities to connect and deliver improved services over a larger footprint, taking full advantage of the potential for financial efficiencies through reorganisation.</li> </ul>
--	--

## 4.4 Thematic analysis

Thematic analysis of the comments in the qualitative, open text, questions was carried out using the codes given to each response as a starting point. The full methodology for how this was carried out is explained in section 3.3.2 and the Appendix (section 2.3 Methodology - Qualitative analysis).

Resulting narratives were developed with detailed nuance and justification included. These are included fully in the Appendix (section 1.2 Narrative from qualitative analysis), and the summaries are provided in tables below to demonstrate the spread and sources of this information. These have been grouped into a set of themes and sub-themes (see table below) to make them more digestible but there are overlaps between the themes and narratives from each of the questions which reflects the amount of repetition that came through from respondents when completing the survey.

Key themes	Sub themes
Key theme 1: General feedback	<ul style="list-style-type: none"> <li>• Alternative views</li> <li>• Representation and voice</li> </ul>
Key theme 2: Sense of place	<ul style="list-style-type: none"> <li>• Boundaries</li> <li>• Social, cultural and political identity</li> </ul>
Key theme 3: Service	<ul style="list-style-type: none"> <li>• Access to services</li> <li>• Delivery of services</li> </ul>
Key theme 4: Trust and confidence in BHCC	<ul style="list-style-type: none"> <li>• Housing and development</li> <li>• Reputation and competence</li> <li>• Finance</li> </ul>

### 4.4.1 Key theme 1: General feedback

#### Sub-theme - Alternative Views

Some respondents suggested alternatives beyond the current proposals, such as dissolving Brighton back into East Sussex, creating a pan-Sussex or coastal mayoral authority, or even splitting Brighton and Hove. Others opposed expansion altogether, citing fears over identity loss, increased taxes, and further pressure on infrastructure. There was also debate over the direction of growth, with many arguing that expansion westwards toward Adur, Shoreham, or Worthing made more sense than eastwards. Opinions were divided on scale: some felt the proposals were too limited to justify disruption, while others argued that a Sussex-wide approach would be more ambitious and effective.

Summary of points from qualitative data	Source question
Alternative structures: Calls for Brighton dissolution, pan-Sussex, or coastal mayoral unitary.	Q15
Opposition to expansion: Concerns include the strain on local infrastructure, loss of historical and cultural ties, environmental impact, and financial implications	Q5
Alternative options: Respondents question eastward expansion, suggesting westward partnerships instead.	Q6
Alternative options: Suggestions for alternative expansion direction (westward), or coastal corridor approach. Preference to remain with current authorities.	Q7,9,11,13

Ambition: Concerns that expansion too small (not worth the upheaval, might just absorb areas without generating benefits) or not bold enough to drive regional change.	Q7,9,11,13
--	------------

### **Sub-theme - Representation and Community Voice**

A consistent concern was the lack of clear information about what reorganisation would achieve, leading many to see it as a takeover rather than a partnership. There was confusion around the process with many raising a preference to remain with existing councils. While some respondents saw potential for improved democracy, more feared that their voice would be diluted and their needs overlooked under a larger council dominated by Brighton. Representation, accountability, and fairness were recurring themes, with questions about whether resources would be shared equitably. Respondents wanted evidence that they would see tangible benefits and guarantees that local decision-making would not be lost.

Summary of points from qualitative data	Source question
Lack of benefits and information: Unclear benefits, poor communication, fears reorganisation resembles a takeover.	Q6
Voice and influence: Many respondents express concerns that merging councils will dilute their local identity and representation. They fear that their voices will be drowned out by the priorities of a larger, urban-focused council, making it difficult for local people to influence decisions that directly affect their lives.	Q5
Representation and accountability: Smaller communities fear losing voice, transparency, genuine engagement and fair representation.	Q6
Benefits: Perceived lack of benefits and risks for communities in expansion areas (housing development, investment focused on Brighton & Hove). Opportunities mentioned (transport, regeneration). More information requested.	Q7,9,11,13
Community voice and representation: Perceptions that communities in expansion areas have not properly been consulted and may be absorbed against their wishes, their voice weakened within a larger city-led council.	Q7,9,11,13

## **4.4.2 Key theme 2: Sense of place**

### **Sub-theme - Boundaries**

Many respondents questioned the logic behind the proposed boundaries, describing them as arbitrary or politically motivated. There were calls for “natural” boundaries that respect geography, transport links, and community ties. An alternative westward expansion or the coastal corridor was seen by some as logical, but others felt rural and inland areas did not belong in a Brighton-led authority.

Summary of points from qualitative data	Source question
Boundary logic: Calls for more natural boundaries, concerns around splitting communities and fracturing local identity and service use. Mixed views on coastal corridor alignment.	Q7,9,11,13

### **Sub-theme - Social, Cultural and Political Identity**

Identity was a strong theme, with strong parish and village attachment from rural communities, and particular concerns about losing historic and cultural ties to Lewes and East Sussex. Many feared being “subsumed” by a larger urban authority with concerns that this would dilute their community spirit, heritage, and political identity. Some Brighton residents also expressed anxiety that their city’s distinct culture could be weakened by merging with neighbouring areas.

Summary of points from qualitative data	Source question
Identity loss: Kingston/Ouse Valley resist transfer, citing historic Lewes ties.	Q15
Community: Concern that a larger council will prioritise urban areas over rural areas leading to loss of community spirit	Q5
Cultural: Residents are proud of their cultural heritage and diversity in Brighton & Hove	Q5
Local identity: Strong feeling around losing individual area’s unique identity and the differences that exist	Q5
Identity, culture, and politics: Merger threatens cultural traditions and political balance across areas.	Q6
Identity: Challenges around community identity (urban vs smaller villages) and historical fit (historic county lines, cultural ties) for expansion areas with Brighton & Hove, suggesting these fit better with Lewes or East Sussex councils. Limited support for where extension feels logical and natural (A).	Q7,9,11,13

### 4.4.3 Key theme 3: Services

#### Sub-theme - Access to Services

Transport and congestion (e.g. the A259 corridor) were major worries, with fears that a larger council would exacerbate existing issues without major infrastructure improvements. Concerns were also raised about waste, education access, especially for rural families, and the potential loss of valued parks and green spaces.

Summary of points from qualitative data	Source question
Transport dependency: Coastal change requires A259 solutions or worsened congestion.	Q15
Education. Access to education and distance from schools is a concern if the council footprint is stretched.	Q5
Parks/greenspace. Residents value their green space for recreation and environmental reasons.	Q5
Traffic/transport. Residents rely on existing services for daily commuting and access to services	Q5
Access to services and education: Residents fear longer travel distances, especially impacting vulnerable groups.	Q6

#### Sub-theme - Delivery of Services

Respondents expressed doubts about Brighton & Hove City Council’s ability to maintain or improve services under a larger and more complex authority. There were fears that vulnerable populations would be most affected (i.e. impact on children with SEND and families and adults needing care), that rural needs would be ignored, and that existing



infrastructure could not cope with further demand. Respondents raised the importance that services continue to be delivered competently and locally. A minority saw an opportunity for a larger council to deliver regeneration and major projects.

Summary of points from qualitative data	Source question
Lewes split risk: Breaking district disrupts schools, SEND, and care pathways.	Q15
Vulnerable at risk: Reorganisation feared to harm families, disabled people, and services.	Q15
Health and care. Concern that the merger will negatively impact the quality and availability of healthcare provision	Q5
Waste. Differing views on quality of service and concern about decline in service provision that exists	Q5
Customer service and communication: Reorganisation risks faceless council, worsening accessibility and resident engagement.	Q6
Rural needs and local knowledge: Brighton unlikely to understand or deliver rural community needs.	Q6
Service performance and workforce pressures: Concerns over job losses, overstretched staff, declining local services.	Q6
Infrastructure: Concern over investment in infrastructure needed. Debate over whether key infrastructure (e.g. Newhaven Port) would strengthen or harm development. Some opportunity to deliver regional infrastructure projects.	Q7,9,11,13
Too big: Challenges of a single council managing large expansion (diverse mix of communities and geographies), pressure on infrastructure, stretching services thin and reducing access to 'local' services.	Q7,9,11,13
Transport and parking: Concerns raised around pressure on existing road networks, traffic and parking. Perception of poor public transport links to Brighton vs Lewes.	Q7,9,11,13

#### 4.4.4 Key theme 4: Trust and confidence in BHCC

##### Sub-theme - Housing and Development

Development pressures were a significant worry. Respondents feared that merging would open their areas to more housing development, reduce green space, and import social challenges from the city.

Summary of points from qualitative data	Source question
Economic fallout: Fears of Brighton expansion undermining Peacehaven, Newhaven, and tourism.	Q15
Housing development. Concerns about excessive development, preservation of green spaces, maintaining local identity and services, ensuring affordable housing, and addressing the strain on infrastructure and services	Q5
Social needs: Many comments express concerns about being negatively impacted by issues around homelessness and antisocial behaviour.	Q6

Housing, development, and environment: Concerns about rural overdevelopment, green space loss, antisocial behaviour.	Q6
--	----

### **Sub-theme - Reputation and Competence**

Trust in BHCC was low, with many respondents' citing a perception of poor financial management and service delivery as reasons to oppose expansion. It is worth noting that a disproportionate number of respondents were from outside the B&H area and so may not have an accurate level of awareness of BHCC's current service provision. The consultation process was also criticised as rushed and biased, reinforcing suspicion that decisions were already made. Some saw the eastward focus as politically driven.

Summary of points from qualitative data	Source question
Flawed consultation: Process criticised as biased, inaccessible, rushed, and manipulative.	Q15
Trust & confidence: General sense of distrust towards BHCC. Criticism of BHCC's service management (bins, housing, public transport, social care) and fears that expansion is driven by financial or political motives (perception of 'land grabbing').	Q7,9,11,13
Political motives: Eastward focus viewed as Labour's ideological land grab.	Q15
Vanity project: Boundary changes seen as costly distractions from local priorities.	Q15
Trust in BHCC. Concern exists around the Council's poor financial management and decision-making	Q5
Trust and competence of Brighton leadership: Brighton seen as mismanaged, untrustworthy, incapable of fair leadership.	Q6
Service performance: Concerns about BHCC ability to service rural, coastal and village needs (communities and environmental) citing perceived weak service performance, comparison with existing councils and potential for unequal resources for new areas.	Q7,9,11,13

### **Sub-theme - Financial Concerns**

Financial worries were common, with anxiety around inheriting Brighton's debt, council tax harmonisation, and the possibility of unfair resource distribution. Many respondents wanted to see robust financial modelling before supporting any change.

Summary of points from qualitative data	Source question
Economic fallout: Fears of Brighton expansion undermining Peacehaven, Newhaven, and tourism.	Q15
Housing development. Concerns about excessive development, preservation of green spaces, maintaining local identity and services, ensuring affordable housing, and addressing the strain on infrastructure and services	Q5
Housing, development, and environment: Concerns about rural overdevelopment, green space loss, antisocial behaviour.	Q6

## 5. Recommendations

A key objective for this community consultation was to gather information that will support the implementation of Local Government reorganisation (LGR) plans and as such the following recommendations have been made as a conclusion of the analysis carried out.

The recommendations and next steps set out in this report should be considered within the specific context of Brighton & Hove City Council. They sit alongside the council's existing objectives, policies, projects, and resources and it is likely that many of the issues raised through the consultation are already be recognised by the council, with steps taken or planned to address them.

The ability to act on recommendations, and to use the findings to support the implementation of LGR, will depend on the council's wider context, priorities, and capacity. The evidence provides insight into which services residents are most concerned about, how people use them, and what misconceptions may need to be addressed through communications, but it is for the council to determine how best to respond within its circumstances.

### Recommendations for next steps

1. **Communicate the Local Government Reform process, objectives and timetable** - Explain the framework and directions from central government and the constraints within which the council is operating.
2. **Communicate a clear case for change** - Explain how reorganisation can positively impact communities, residents and businesses and how benefits will be shared fairly across communities.
3. **Clarify boundaries and direction of growth** - Provide transparent reasoning for chosen areas, address perceptions of political bias, and explain why alternatives were ruled out.
4. **Protect local identity and representation** - Consider governance mechanisms such as area committees or parish involvement to safeguard local voices and maintain accountability.
5. **Commit to service continuity and improvement** - Share concrete plans for maintaining and enhancing key services, with specific guarantees for rural areas and vulnerable groups.
6. **Address transport and infrastructure concerns** - Link reorganisation to investment in transport, education, and community infrastructure, with clear timelines and funding commitments.

7. **Rebuild trust through better engagement** - Design a more inclusive, participatory process with two-way dialogue, accessible information, and visible responsiveness to feedback.
8. **Provide financial transparency** - Publish financial modelling, show how debt will be managed, and commit to fair resource allocation and council tax stability.
9. **Safeguard green spaces and manage development** - Set out how housing growth will be balanced with infrastructure and how local character and open spaces will be protected.
10. **Demonstrate early wins** - Deliver visible improvements in key services before or alongside reorganisation to build credibility and confidence.



# Brighton & Hove City Council

## Cabinet

## Agenda Item 38

**Subject:** The King Alfred Leisure Centre Regeneration Project

**Date of meeting:** Thursday, 25 September 2025

**Report of:** Cabinet Member for Sports, Recreation & Libraries

**Lead Officer:** Name: Corporate Director- Operations

**Contact Officer:** Name: Mark Healy

**Email:** [Mark.Healy@brighton-hove.gov.uk](mailto:Mark.Healy@brighton-hove.gov.uk)

**Ward(s) affected:** (All Wards);

**Key Decision:** Yes

**Reason(s) Key:** Expenditure which is, or the making of savings which are, significant having regard to the expenditure of the City Council's budget, namely above £1,000,000 and is significant in terms of its effects on communities living or working in an area comprising two or more electoral divisions (wards).

**For general release**

### 1. Purpose of the report and policy context

- 1.1 This paper seeks Cabinet agreement to progress the King Alfred Regeneration Project from its current concept design stage (Royal Institute of British Architects Plan of Work Stage 2 or RIBA 2) through to spatial coordination and technical design (RIBA stage 3 and 4) including submission of the planning application.
- 1.2 This paper sets out an overview of the emerging concept design (and associated cost plan) which the professional team have developed since their appointment at the beginning of the year. The concept design stage (RIBA 2) has now concluded.
- 1.3 The next stages (RIBA 3 & 4) will entail developing the detailed design with the main contractor up to the point where the planning application can be submitted, together with initial enabling works. This Cabinet report therefore represents a key gateway to secure agreement to take the project forward to those next stages.
- 1.4 The replacement of the King Alfred Leisure Centre aligns with the Council Plan 2023-2027, particularly Outcome 1 *A city to be proud of*, which sets out a commitment to *'Deliver improvements to leisure facilities across the city'* and Outcome 3, *'A healthy city where people thrive'*. Replacing the facility is also a specific commitment of the council's Sports Facilities Investment Plan (SFIP).

## **2. Recommendations**

That Cabinet:

- 2.1 Agrees that the design team progress further the design proposals presented at appendix 1 and delegates authority to Corporate Director, City Operations in consultation with the Cabinet Member for Sports, Recreation & Libraries to proceed with submission of a planning application based on those designs.
- 2.2 Approves the indicative capital budget for the project of up to £65 million to be included in the Medium-Term Capital Investment Programme to be funded from a combination of capital receipts, government grants and council borrowing.
- 2.3 Approves an allocation of a further £2.3 million of these resources, in addition to the £2.7million agreed at July 2024 cabinet, for professional fees, surveys, and investigations relating to the development of the design proposals through RIBA Stage 3 (including submission of a planning application), and RIBA Stage 4 with enabling works.
- 2.4 Approves the demolition of redundant parts of the site (appendix 5) between the current facility and the car park so that the enabling works for the new facility and regenerated public realm can come forward.

## **3. Context and background information**

- 3.1 The regeneration of King Alfred Leisure Centre is a key strategic investment for the city. The project will deliver the regeneration of an iconic site and provide a 21<sup>st</sup> century leisure facility to meet the city's needs now and for decades to come. In addition to making accessible active leisure available, and the well-being benefits that generates, the wider placemaking across the site will also deliver a compelling destination for residents and visitors. The regeneration of the site will unlock the delivery of additional housing provision for the city, described in more detail below.
- 3.2 The delivery of a new facility to replace the existing King Alfred Leisure Centre is central to the Council's Sports Facilities Investment Plan 2021-31 (SFIP). The SFIP was approved by Policy & Resources Committee in July 2021 and is the strategic plan for improving the city's sports facilities.
- 3.3 The approach to the regeneration of the King Alfred site is underpinned by the council's commitment to placemaking, ensuring the scheme contributes positively to the character and function of the Hove seafront. The proposals are designed to create a welcoming and accessible civic destination that integrates with Hove Beach Park, the adjacent outdoor sports facilities, local residential neighbourhoods, the promenade and Hove Lawns. Key considerations include enhanced pedestrian and cycle connections, and improvements to public realm focused on encouraging activity, social interaction, and ease of movement.

- 3.4 In parallel with the delivery of the new leisure centre, the project will enable the release of surplus land for much-needed new housing provision, in support of the Council's wider housing objectives and [Housing Strategy](#). Coordination with the recently established Seafront Development Board, which held its inaugural meeting in September 2025, will ensure that the project aligns with the broader strategic aims for regeneration and investment, providing a joined-up approach to placemaking across the wider seafront and maximising benefits for the city as a whole.
- 3.5 The project also offers an historic opportunity to make good on the council's commitment to deliver a *healthy city where people thrive*. As demonstrated in the paper presented to Cabinet last July, there are significant health inequalities across the city. Whilst Brighton & Hove is one of the country's most active cities, there remain some communities in which there are localised pockets where levels of physical activity are very low. This in turn often leads to higher instances of illness associated with low levels of activity. These illnesses include cardiovascular illness, stroke, type 2 diabetes, and others.
- 3.6 The new King Alfred facility will provide accessible active leisure opportunities for all Brighton & Hove's residents, especially those in the west of the city. In addition to improving the wellbeing and quality of life for the city's residents, the new facility also offers the potential to deliver economic benefits. In particular, reduced costs to the exchequer from dealing with the consequences of the negative health outcomes noted above. This is explained in more detail in section 11.

### **Cabinet decision to deliver the new facility**

- 3.7 At its [July 2024 meeting Cabinet considered a paper](#) setting out options for replacing the existing King Alfred Leisure Centre with a new facility. The paper explained why a refurbishment of the existing facility would not be viable and then went on to set out options for delivering a new facility. The options presented offered several illustrative designs on two separate sites – the current site and the council-owned green space south of the Sainsbury's superstore at the junction of the A273 and Old Shoreham Road.
- 3.8 Having considered the site options, the business case outcomes, and the results of the resident engagement, Cabinet agreed the recommendations set out in the paper. The key recommendations were to:
- develop design proposals for a new facility on part of the existing site,
  - agree delegated authority to the Corporate Director to approve the procurement of the associated professional team and to progress the project to planning application stage.

### **Appointment of the professional team**

- 3.9 Following Cabinet's decision to proceed with the project the officer team undertook a programme of procurement work to appoint the professional team that will take forward the design work to the planning application stage. More information on the process is given in section 12.

- 3.10 The outcome of that process was that officers identified an architect and professional team through the [UK Leisure Framework](#), accessed through development partner [Alliance Leisure](#).
- 3.11 The core professional team selected is made up of:
- [GT3 Architects](#), one of the UK's leading architects with a primary focus in the leisure sector and proven expertise in designing energy efficient sports facilities. GT3 previously worked with the council on the development of the [Sports Facilities Investment Plan](#) and have a good understanding the council's vision for sport and leisure in the city.
  - [Engenuiti](#), civil and structural engineers for the project. Engenuiti were part of the team which developed the project's business case earlier this year and prepared the structural report which was key in supporting the council's proposal to replace rather than refurbish the existing facility.
  - [Van Zyl & de Villiers \(VZDV\)](#), building services and engineering consultancy. They have a strong track record in the leisure sector having completed over 150 leisure facilities in the UK, Channel Islands, and 11 countries in mainland Europe.
  - [Hadron Consulting](#), technical project manager. During the market engagement work described in 3.5 – 3.7, Hadron prepared some very effective cost consulting work in which they demonstrated a high degree of innovation and sector knowledge in showing how the most impactful facility could be delivered for the available budget. As the project progresses, Hadron will bring on other specialist consultants as required.
  - [Willmott Dixon](#), main contractor. Appointed on a Pre-Construction Service Agreement, they are the UK's leading leisure centre contractor with experience of successfully building leisure centres across the country. They are able to advise the team on issues such as buildability and site preparation. They will not be appointed to deliver the full project unless the team are happy with the proposed cost once the building design is complete and this is also subject to Cabinet approval.
- 3.12 Following appointment via Alliance Leisure, the design team have been working closely with officers to develop the design proposals for the new facility, together with outline master- planning work for the whole site. The outcomes of this work are set out in the next section.

#### **4. Analysis and consideration of alternative options**

##### **Design proposals: facility mix and floor layout**

- 4.1 The design of the new facility began with developing an agreed facility mix and determining how best to arrange those facilities to respond the challenges and opportunities presented by the seafront site. **The proposed general arrangement drawings (floor plans) for the new facility, together with internal and external images, are set out at appendix 1.**



- 4.2 The design proposals at this stage represent the work of the design team up to the end of RIBA Stage 2 (concept design). As the project progresses into RIBA Stages 3 and 4, some of the design elements may change to reflect discussions with the contractor on questions of buildability and other factors to maximise the efficiency with which the facility mix is delivered within the building's envelope.
- 4.3 The team have sought to arrange the facilities to meet the following objectives:
- to make best use of the site to accommodate the fullest range of facilities, making creative use of the on-site elevation changes
  - to provide a mix of facilities that reflects the ambition of the [Sports Facilities Investment Plan](#) (SFIP) whilst remaining affordable
  - to make use of the site's orientation to provide sea views from the cafeteria, pools, and fitness suite, and to make the most of the south-facing side of the building to help heat the pool halls by maximising solar gain
  - to provide a main entrance which opens out into a regenerated public realm, protected from prevailing winds and away from traffic
  - to minimise wasted space, with no unnecessary corridors or stairways such as those which characterise the current facility.
  - to reflect advice and guidance from national governing bodies, such as Sport England and Swim England
  - to reflect feedback from engagement earlier this year on the emerging designs for the new facility with sports governing bodies, local sports clubs, regular users, and resident groups (see section 5, paras 5.1 – 5.4)
  - to reflect the advice of leisure operators captured through recent soft market engagement with them (see section 5, paras 5.9 – 5.12)
  - to provide an appropriate level of parking, without letting the car park dominate the site, along with easy and safe access for cyclists and pedestrians.
- 4.4 The floor layouts and internal design proposals reflect the design team's work in seeking to meet those objectives. Notable features of the design proposals are:
- incorporation of a much larger fitness suite (140-150 gym stations). We know from engagement with operators that the fitness suite will generate the most income per m<sup>2</sup>, and which is also most effective in delivering improved health outcomes
  - a family entertainment zone, which in discussion with the operator can be fitted out as a soft play area, clip and climb, or similar attraction. These facilities are highly effective in attracting new users and in generating income

- a leisure water facility, to help encourage water confidence for children, to attract families, and to help generate revenue.

### **Emerging exterior and interior design proposals**

- 4.5 Given the more intense weathering associated with the coastal location, it has been especially important to ensure that the facility's design features and material choices take account of those challenges. The detail of the surface finishes and material choices is currently being developed with Willmott Dixon.
- 4.6 The emerging proposals include the use of innovative, but well-tested technologies such as structural timber of the frame of the building. In addition to the sustainability benefits set out in section 10, composite timber materials are also better suited than steel to weathering the humid, saline conditions that characterise the site.

### **Wider public realm**

- 4.7 The King Alfred site is one of Hove's most iconic waterfront locations, and it is also a key gateway for those arriving in the city from the West. With that in mind, in addition to designing the new King Alfred facility, the design team were also commissioned to develop proposals for regenerating the surrounding public realm. The team were asked to develop proposals to:
- create a compelling outdoor and indoor destination for all residents visiting the area, not just users of the new King Alfred
  - design a public space to connect logically and sensitively to the Kingsway, Esplanade, Hove Beach Park, and other surrounding areas
  - create an inspiring place where residents and visitors will want to spend their leisure time
  - ensure inclusivity, with a space that can be easily navigated by disabled residents, including wheelchair users, parents with young children / pushchairs, and others.
- 4.8 The public realm designs will be shared as part of our next stage of engagement as described in section 5.

### **Financial viability**

- 4.9 From its inception three years ago, the funding for the current project has been based on a combination of the capital receipt from the sale of part of the site together with prudential borrowing over the life of the new facility. The financial viability of the project is therefore dependent on three key elements:
- the total project costs for delivering the new facility, including build costs and professional fees
  - the capital receipt to be realised from the sale of the remainder of the King Alfred site
  - the increased revenue the new facility is expected to generate, which will help service the debt over the life of the new facility.

- 4.10 The financial viability of the project was examined in the business case presented to Cabinet last July. That work has been updated with new land valuations produced by commercial agents Avison Young and Stiles Harold Williams (SHW), new project costs prepared by the main contractor Willmott Dixon, and updated revenue projections prepared by Continuum Sport and Leisure (the same consultant who produced last year's business case and The Sport Consultancy (TSC).
- 4.11 A summary of the headline figures from the new financial modelling is set out in table 1 below:

<b>Table 1. Headline project costs</b>		
<b>Headline financials</b>		<b>Notes</b>
£65m	Total project costs	This figure reflects the RIBA 2 cost plan developed by Willmott Dixon. It includes £43.9m for build costs, £4.7m for main contractor preliminaries, £6.9m for contingencies, a 6 per cent inflation allowance (£2.9m), professional fees, and other relevant costs including insurance, and overhead and profit (OH&P). Officers are presently interrogating these costs with input from cost consultants Abacus with a view to securing savings and value engineering to reduce the overall project cost. However, for the purpose of this report the total figure (rounded up) provided by the contractor has been used.
£17.3m-£26.4m	Capital receipt from sale of 60% of the site	For the cabinet paper presented in July 2024, the land valuations used were based on a report completed in December 2022 by Avison Young. That report suggested a value for the whole site of £31.2m, equating in pro-rated terms to £18.7m for the 60% proposed for residential development. Two separate land valuations were commissioned for the site with commercial agents Avison Young and Stiles Harold Williams (SHW). The valuations were conducted for the residential part of the site only. Those reports returned a range of values from a lowest possible estimate of £17.3m to a higher estimate used for this report of £26.4m. That higher estimate included an assumption of 40% affordable housing, and the demolition and remediation costs funded by Homes England Grant. The report did include land value estimates with lower levels of affordable housing which were significantly higher. However, this report focusses on using the highest policy-compliant estimate. Both valuations, together with the upper and lower revenue estimates

		(see below) are used in the following sections to set out four alternative cost scenarios shown in 4.14 and table 2.
£38.6m- £47.7m	Balance to finance over 50 years @ 4.5% interest	The balance to finance is the total project less the capital receipt. Two values are shown reflecting the upper and lower land valuation estimates from the row above. The finance is based on a 50-year borrowing period which reflects the expected operational life of the project and the maximum period permitted for Public Works Loan Board (PWLB) borrowing. The indicative interest rate used reflects predicted PWLB rates once the project is in construction. The impact of other rates has been modelled and is summarised in section 6 <i>Financial Implications</i> .
£1.95 - £2.4m	Gross annual cost of debt over 50 years	This is the annual cost of servicing the debt based on the payment period (50 years) and interest rate (4.5%) set out above. Two values are shown reflecting the cost of financing the upper and lower balances shown in the row above.
£1.06m - £1.45m	Projected turn-around from revenue	As with the land valuation, two separate reports were commissioned to provide updated revenue projections for the new facility. One of the reports was produced by Continuum Sport and Leisure who prepared the business case which formed the basis of the July 2024 cabinet paper. The other was prepared by The Sports Consultancy. Both are leading sports consultants using their own well-established methods to estimate potential future revenue from the new facility mix. They each produced a range of estimates based on different assumptions. The highest and lowest assumptions are shown here and used in the four scenarios shown in 4.14 and table 2, below.
£0.55m - £1.4m	Net annual cost to revenue budget service debt.	The net borrowing annual costs are derived from the gross costs (£1.95- £2.4m) less the projected revenue (1.0m – 1.4m). This gives a range of costs

- 4.12 The headline project cost of £65m includes £6.9m contingencies, and a further £2.9m of tender inflation. Taken together these represent **£9.8m** incorporated into the headline cost for contingencies and inflation. The contingency allowance incorporates the main contractor's contingencies (approximately 10 per cent of construction costs) plus additional client



contingencies. The inflation allowance is based on industry forecasts and aligned with the target delivery dates for the programme.

- 4.13 The business case presented to Cabinet in July 2024 had proposed a total project cost of £47.4m. The differences between the two estimates reflect:
- an enhanced specification for the new facility developed with the design team. Compared to the proposal presented last year, the facility has a much larger fitness suite, family entertainment zone, larger cafeteria, leisure water offer, and features such as a movable floor for the training pool, as well as a more impactful overall presence for the facility
  - a more detailed understanding of the site conditions and the remediation work required, informed by the new site survey work commissioned with the design team and from engagement with the main contractor
  - a more realistic view of the costs of an undercroft car park
  - the inclusion of the development of the new area of regenerated public realm to form an entrance plaza to the facility, which is an addition to the original brief
  - cost inflation in the construction sector.
- 4.14 Table 2 below shows the annual revenue cost to the council based on the four scenarios mentioned in table 1. These scenarios reflect the upper and lower capital receipt estimates (£17.3m and £26.4m) cross-tabulated against the upper and lower revenue estimates (£1.06m and £1.4m).

<b>Table 2. Comparison of all revenue costs based on highest and lowest land valuations and revenue estimates.</b>				
	<b>Lower capital receipt estimate</b>		<b>Upper capital receipt estimate</b>	
	<b>Scenario 1</b>	<b>Scenario 2</b>	<b>Scenario 3</b>	<b>Scenario 4</b>
	<b>Lower revenue estimate</b>	<b>Upper revenue estimate</b>	<b>Lower revenue estimate</b>	<b>Upper revenue estimate</b>
Total project costs	£65m	£65m	£65m	£65m
Capital receipt from sale of 60% of the site	£17.3m	£17.3m	£26.4m	£26.4m
Balance to finance over 50 years @ 4.5% interest	£47.7m	£47.7m	£38.6m	£38.6m
Gross annual cost of debt over 50 years	£2.4m	£2.4m	£1.95m	£1.95m
Projected turn-around from revenue	£1.06m	£1.4m	£1.06m	£1.4m
<b>Net annual revenue cost to service debt</b>	<b>£1.34m</b>	<b>£1.0m</b>	<b>£0.89m</b>	<b>£0.55m</b>

- 4.15 Based on the assumptions described in table 1 and paragraphs 4.12 – 4.14, table 2 shows the range of possible annual revenue costs to the council. These range from a highest cost of £1.34m per year – reflecting the lowest estimated land value and the lowest estimated revenue, to £0.55m per year reflecting the highest estimated capital receipt and highest estimated revenue.

### **Comparison with 2024 business case proposal**

- 4.16 Working with the design team, officers have examined the feasibility of delivering a new facility within the original £47.4m budget. Whilst a facility could be delivered on site for that budget, it would require a significantly compromised design that would fall some way short of the ambition of the [Sports Facilities Investment Plan](#). The lower cost option would feature:
- no family entertainment zone
  - no leisure water
  - a much smaller fitness suite
  - smaller studios
  - sports hall capacity for 4 courts only
  - no undercroft car parking, with only very limited surface parking.
- 4.18 This more constrained specification would not only fall short of the council's ambition for the new facility and diminish its potential for improving the city's health outcomes, it would also result in markedly reduced revenue generation. Table 3, below, sets out a summary of the modelled headline financials for both options.
- 4.19 The table shows that whilst the annual borrowing costs for the £47m option would be £0.45m lower, the projected revenue would also be much lower (£0.5m compared to £1.06m). There would be a £0.4m annual loss of revenue resulting from the loss of car parking capacity on the site. Taken together, these factors are projected to result in net annual costs for the £65m proposal that are £0.45m less than for the £47m proposal.

<b>Table 3. Comparison of costs for current design proposal with notional costs for a reduced specification facility</b>		
	<b>Current proposal</b>	<b>Reduced cost proposal</b>
Total project costs	£65.0m	£47.0m
Capital receipt from sale of 60% of the site	£26.4m	£26.4m
Balance to finance over 50 years @ 4.5% interest	£38.6m	£20.6m
Gross annual cost of debt over 50 years	£1.95m	£1.5m
Projected turn-around from revenue	£1.06m	£0.5m
Loss of revenue from car park	--	(£0.4m)
<b>Net annual revenue cost to service debt</b>	<b>£0.89m</b>	<b>£1.4m</b>

- 4.20 For both cases, the higher capital receipt estimates have been used. This is because the capital receipt featuring that valuation was a more recent piece of work, reflecting more up-to-date market intelligence. As noted in table 1, that report did also include significantly higher valuations for developments that were not policy compliant. However, for this report, the policy compliant (40% affordable housing) valuation has been used. For both cases, the lower revenue assumption has been used. This reflects a more cautious approach to business planning which recognises the potential for volatility in the leisure sector over the life of the project.
- 4.21 The capital receipts used to model the financing of the project assume remediation costs for the site will be met by grant funding. The project team is liaising with Homes England to explore options for grant funding to support the capital receipt for the residential part of the site and to reduce the abnormal and enabling costs for the leisure centre part of the site. The team has also been securing support for the project from Sport England and other governing bodies to help strengthen the case for grant funding.
- 4.22 For the previous project to deliver a new King Alfred facility (Crest Nicholson, 2019), a Housing Infrastructure Fund (HIF) grant of £15m was secured to support remediation and basement works. However, this was not sufficient to prevent the project stalling due in part to viability concerns by the developer. This historical precedent demonstrates the need for grant funding to enable the project to progress, which is one of Homes England's requirements for securing grant funding. The project team is continuing advanced negotiations with Homes England to bring in a higher level of funding for both the leisure and residential parts of the site to ensure this iteration is not stalled by abnormals.

#### **Further financial modelling**

- 4.23 The exact structure of the loans and the details of the borrowing arrangements will be developed further over the next stages of the project. For example, the capital receipt for the sale of the residential part of the site will not be received until after the new facility is completed. The business case last year modelled borrowing based on the capital receipt being received in four installments over an eight-year period.
- 4.24 The base assumption of ongoing costs to the council's revenue budget of the facility is £0.890 million. This is planned to be offset by a combination of the following actions which could generate between £0.800 million and £1.250 million
- reprioritising income streams within Leisure Services
  - making use of new agency regulations to recover previously unrecoverable VAT for leisure operating contract
  - as noted in 4.21 and 4.22, pursuing Homes England grant funding to support remediation and enabling works on the existing leisure centre side of the site

- improving potential turnaround performance of the new King Alfred facility - to be examined by newly commissioned work with The Sport Consultancy (TSC)
- reduce planned maintenance
- reprioritise the capital investment programme to redirect additional funding to the new King Alfred facility
- sale of other assets to reduce borrowing.

#### **Professional fees – spend to date and forecast pre-contract expenditure**

- 4.25 At Cabinet in July 2024 a sum of £2.7 million was approved for the development of design including submission of a planning application. Since then, the project team, appointed via Alliance Leisure, have completed RIBA stage 2, and have commenced RIBA stage 3. Professional fees expended to date amount to just under £0.8 million of the £2.7 million agreed last year.
- 4.26 As noted in paragraph 2.4, approval of an allocation of a further £2.3 million is sought to progress the project to RIBA 4. This increased allocation will not only enable the project to progress to planning application but will also enable key elements of the sub-contractor design work to be completed at an earlier stage. The allocation will also enable the team to proceed with preparatory work for the demolition and associated enabling works for the green roof area between the current King Alfred and the car park. That work will entail surveys, making safe, and removal of harmful materials (including asbestos) where needed. This is explained further in the following paragraphs.
- 4.27 Willmott Dixon as main contractor were appointed earlier this year under a pre-construction services agreement (PSCA). Willmott Dixon are responsible for the design team and surveys and investigations from RIBA Stage 3 onwards. The key project stages to complete to allow a main contract to be entered into are RIBA Stages 3 & 4. At the end of RIBA Stage 3 a planning application will be submitted, with the planning fee paid by BHCC. A Planning Performance Agreement (PPA) is also being entered into which also attracts a fee.
- 4.28 In addition to the continuing design work and planning application, the additional budget allocation will also support:
- significant investigation and survey work required during RIBA Stages 3 & 4, to support the enabling works and making-safe the existing bowling alley
  - council direct costs to be attributed to the project, predominantly for capitalised salaries of the council project team
  - completion of a number of key design elements to be completed by sub-contractors, (the 'contractors' design portion' (CDP) elements). This work would typically be undertaken post-contract. However,



bringing this work forward will significantly benefit the scheme and reduce risk

- delivery of an overall bigger scheme and more highly specified facility than conceived in the July 2024 cabinet paper.

- 4.29 The resulting forecast for pre-contract expenditure for RIBA Stages 3 & 4 amounts to £4.2 million in addition to the £0.8 million spent so far. With that in mind, Cabinet approval is sought for an allocation of a further £2.3 million of these resources, which together with the £2.7 million agreed last year will provide a total allocation of £5 million to take the project to RIBA 4 including enabling works.

### **UK Leisure Framework – Commercial Arrangements**

- 4.30 The Council have appointed Alliance Leisure under an Access Agreement to develop the pre-construction elements of the project (RIBA Stages 1 – 4). The Access Agreement constitutes a pre-construction agreement for construction projects. In entering into the Access Agreement, the Council does not commit itself to enter into a call off contract for the construction phase, which the Council may do or not do at its discretion.
- 4.31 Alliance Leisure have entered into a Pre-Construction Services Agreement with Willmott Dixon for Main Contractor and Design Team services to develop the scheme during the pre-construction elements of the project (RIBA Stages 3 – 4). There is no commitment to Willmott Dixon to enter into contract unless the Council wish to do so.
- 4.32 Alliance Leisure have also instructed Abacus cost consultants to independently review the Willmott Dixon Stage 2 Cost Plan to ensure value for money (VfM). Each RIBA stage cost plan will be reviewed and challenged to ensure costs remain within the budget envelope.
- 4.33 Contingency and inflation allowances have been considered in detail with the wider project team, and the client contingency figure considered against similar schemes and the specific risks and issues presented by the King Alfred project. A detailed risk register is being managed throughout the pre-construction stages with responsibilities for each risk clearly identified, which will be included within the main contract.
- 4.34 Should it not be possible to reach an agreement to enter into a main contract, or if the council wish to pause or walk away from the project, the contractor grants a non-exclusive, assignable, irrevocable and perpetual licence (including the right to sub-licence) to the council to copy, adapt, publish, distribute and otherwise use the project-specific information and designs that have been developed.

### **Marketing of the residential part of the site**

- 4.35 From the project's inception, the capital receipt from the disposal of part of the site for residential development has been a key component in the funding strategy for the new facility. In addition to being central to the

funding strategy, the residential development is also a planning policy requirement. Specifically, in addition to redeveloping the sport and leisure facility, City Plan part 1 allocates the current King Alfred site for *provision of a minimum 400 residential units with ancillary retail and café/restaurant uses* (planning policy SA1).

- 4.36 The financial modelling set out in the July 2024 cabinet paper featured the capital receipt based on a land valuation completed at that time. As noted above in paragraphs 4.10, the valuation has been updated with two new valuations. The new valuations are based on valuing only the part of the site that is not required for the sport and leisure centre and the enhanced public realm.
- 4.37 The most recent of the valuations is based on outline masterplanning work for the residential part of the site with a total of 428 residential units and activation of some parts of the ground floor with commercial uses. That valuation suggests that a capital receipt of around £26.4m could be realised for disposal of the site for a policy compliant (40% affordable) development based on that outline masterplan. That valuation also assumes grant funding to meet the demolition costs, as described in paragraphs 4.21 and 4.22.
- 4.38 It has been the council's intention since the inception of the project to keep the current facility open and operational whilst the new facility is constructed. Once the new facility is open, demolition of the existing facility will commence. As shown in the indicative programme in paragraph 4.41 below, that is expected to be from May 2028 onwards.
- 4.39 To minimise borrowing costs to the council, it is essential that the disposal of the site, and thus delivery of the capital receipt, takes place as soon as possible after the delivery of the new facility. With that in mind, it is proposed that marketing of the site begins during autumn of this year with a view to securing a buyer ahead of the completion of the new facility. That will in turn enable the contractual arrangements for the demolition and disposal of the site to be resolved in a timely way to bring forward the delivery of the capital receipts to the soonest practical point. It is therefore proposed that marketing of the site begins this Autumn alongside the development of the design work for the new facility.

#### **Temporary car parking**

- 4.40 Although the design proposal will re-provide the same level of parking capacity in the undercroft, there will be a period during construction where parking on the existing site is lost. The project team is presently investigating opportunities to use the adjacent Hove Park event space area for displacement parking in order to maintain parking revenue during construction and to safeguard the existing facility against the risk of lost custom if there were to be no parking available during the construction period.

#### **Overall project schedule**

- 4.41 Below is an indicative timeline for delivery of the project.

<b>Table 3. Indicative project schedule</b>	
<b>Project stage</b>	<b>Indicative date</b>
PCSA / RIBA Stage 3 commencement	August 2025
Seek Cabinet approval to proceed	September 2025
Planning Application submission	November 2025
RIBA Stage 4 commencement	November 2025
Planning Determination	March 2026
Enabling works commencement	March 2026
Discharge pre-commencement conditions	May 2026
Contractors Proposals	May 2026
Enabling works complete	June / July 2026
Approval to proceed to Contract	Jun 2026
Mobilisation	July 2026
Main Contract commencement	August 2026
King Alfred Leisure Centre completion	May 2028

## **5. Community engagement and consultation**

5.1 Close and regular public engagement has been a key priority of the project since its inception in Autumn 2022. The programme of engagement can be summarised as follows:

- phase 1, from September to December 2022. This first period focused on core users of the King Alfred such as leaseholders and occupiers (e.g. the boxing club), sports clubs, and community groups that regularly book the facility to understand their needs and requirements.
- phase 2, from January 2023 and throughout the rest of that year. This stage entailed connecting with wider community groups and residents. It involved discussing how best to deliver the specification as set out in the SFIP. Notable elements of this phase included a visioning workshop with over 50 participants, an all-day drop-in event in April 2023, and the commissioning of specialist work with the Trust for Developing Communities to engage with minoritised ethnic groups and younger people
- phase 3, beginning of January 2024. This phase aligned with the work to develop the July 2024 cabinet paper, which included examining the possible sites for the new facility. This phase included all-day drop-in sessions at the King Alfred centre and other venues in the west of the city, and an on-line questionnaire on the sites and delivery options for the new facility which generated over 3,600 responses.
- phase 4. Beginning in January 2025, this phase aligns with the work of the design team (also appointed in January 2025) to develop the design proposals to deliver the new facility and improved public realm on the existing site. The design team engaged directly with key users through the Reference Group, and where invited attended meetings of local

groups such as the West Hove Seafront Action Group and the Hangleton & Knoll Project. In addition:

- a series of focus groups sessions were held in April and May at the King Alfred to engage with sports clubs, community groups, disabled users, and local residents (The report from the focus groups is attached at appendix 2).
- during July detailed 'surgeries' were offered to sports clubs in which they were able to meet with the design team to work through their specific needs. In addition to local grass-roots sports clubs, governing bodies including Sussex FA and Sussex Cricket also participated, as well as groups who run active sessions for older people and disabled users of King Alfred. The design team has subsequently been working to incorporate, where practical, findings from these sessions into the developing design.

- 5.2. In addition to the engagement described above, the design team engaged closely with some of the groups representing disabled people to understand their needs. For example, the design team joined the Dolphin's Disabled Swimming Club to observe one of their sessions and conducted a 'simulation walk' around the existing facility with the Sussex Sight Loss Council to understand the challenges faced by those with visual impairment.

### **Key messages from the latest phase of community engagement**

- 5.3. Key messages to emerge from the latest phase of engagement were:
- the importance of ensuring accessibility for disabled users. The groups we spoke to mentioned the need for meaningful inclusion, sensory-sensitive design, accessible changing, specialist equipment, and staff training.
  - many of those we spoke to felt that in addition to providing inclusive fitness opportunities, the new facility should also be a space to promote social cohesion and wellbeing.
  - inclusivity was a strong theme. Many felt it important that the new facility was designed in a way to provide privacy and cultural sensitivities where appropriate. This was often mentioned by younger women who felt the current design could discourage some from using the current swimming pool as they felt surveilled by users of the gym and some of the public parts of the facility.
  - many of the sports clubs we engaged with shared their concerns about what they felt were outdated spaces and lack of specialised equipment in the current King Alfred. Many also spoke about what they felt were poor quality changing facilities and lack of storage space for club equipment. They were keen for those issues to be addressed in the new facility.
  - ensuring the future viability of the facility was also a common theme. Many stressed the importance of ensuring that flexibility and adaptability was built into the design so that the internal spaces could adapt suit the needs of new sports and activities as trends and preferences change over the coming years and decades.



- a number of the clubs that regularly use the facility highlighted issues that were very specific to their sports, activities, or user groups. This included discussions with the disabled swimming club to understand how best to support their members in accessing and exiting the pool in a convenient and independent way, and discussions with sports clubs about requirements for equipment storage, lighting, and floor surface treatments.
- 5.4. The report from the focus groups is attached at appendix 2 and the summary of key messages from July sports clubs engagement is attached at appendix 3.

#### **Design review panel**

- 5.5. As part of the design development process, an all-day 'designPLACE' review session was convened on 20 June with Design South East's [Brighton & Hove review panel](#). The panel provided feedback and challenge on the design, and offered suggestions for the design team to consider that could potentially enhance the new facility.
- 5.6. Following the session, the design team identified 36 substantive comments from the panel's report, grouped under 9 broad themes:
- Project brief and community engagement
  - Masterplan
  - Wider context and analysis
  - Connectivity and movement
  - Entrance and arrival experience
  - Landscape
  - Massing, form and articulation
  - Active frontage and indoor/outdoor relationships
  - Sustainable design.
- 5.7. Following the panel session, officers have been working with the design team to develop proportionate responses to each of the comments. Those comments will continue inform the design of the new facility and adjacent public realm into the next project stage (RIBA 3) and up to the planning application.

#### **Engagement with leisure operators**

- 5.8. In parallel with phase 4 of the resident engagement, the council has recently undertaken some early market engagement (EME) relating to the re-procurement of the council's long-term leisure management contract. Led by the council's appointed leisure consultants Continuum Sport & Leisure, the purpose of this engagement was to seek views from the leisure operator market as potential bidders for the new contract, to help inform the development of the procurement strategy and to refine the service requirements/scope for the new contract.
- 5.9. This separate piece of work is very relevant to this project as the outcome of this procurement process will determine the leisure operator that will be

responsible for the management of this new facility, as well as the council's other sports facilities. As part of the EME process, the emerging designs for this new leisure facility were shared with operators to also gather their feedback on the facility mix/specification and plans, and in particular any aspects of the design that could impact on the viability of the business plan and/or anticipated revenue.

5.10. Operators were generally positive about the initial designs however they did identify a number of areas for further consideration - a high-level summary of this feedback can be seen below:

- the option of moveable floors in the swimming pools will increase the flexibility of the programme
- there is potential to integrate drowning detection technology into the design of the swimming pools
- the location of the sauna and steam room on poolside will help with access and management
- some operators felt the studios may be too small, which will impact on the capacity of the group exercise programme at peak times and hence membership sales
- the proposed power assisted studio is a good addition but could be incorporated into the main gym space to enable management and flexibility to make adaptations in future if needed
- demand for the sports hall should determine the size of the hall
- combined dry-side changing facilities to serve the gym and sports hall seems sensible as the majority of users do arrive already changed for their activity
- the location of the cafe and reception is critical in terms of access and management
- the separate family entertainment/activity play spaces may be too small to be viable and should be merged into one larger space and located next to the cafe – operators would welcome the opportunity to shape proposals for these spaces with commercial viability in mind
- operators signaled concerns that parking may be charged for leisure centre users (which is the current arrangement for the car park adjacent to the King Alfred facility. This would be reflected in the management fee payment for the overall leisure contract. Operators would prefer a time-limited parking offer for customers to avoid abuse of the system and would also expect some control over parking so that customers could access the facilities at busy times (otherwise this would impact on revenue/usage).

5.11. This feedback gathered from the leisure operator market will be factored into the ongoing considerations for the next phase of design work, alongside the views that have been captured from residents and sports clubs.

#### **Next steps with the engagement work**

5.12. Looking ahead, a further phase of communications and engagement is planned to begin after the cabinet meeting and ahead of the planning application of being submitted. This will provide an opportunity to share the proposed designs with users and local residents ahead of the statutory consultation for the planning application (to be submitted just before the end of the year). This next phase of engagement will include:

- the launch of a new microsite, which has been developed with Alliance Leisure, which will provide floor plans and CGI images of the interior and exterior of the new facility
- the launch of a survey using the council's 'Your Voice' portal, where residents will have the opportunity to comment on the design proposals
- an exhibition week, to be held at the existing King Alfred leisure centre, where visitors can view exhibition boards setting out the design proposals and explaining the journey that has led to the design team to arrive at proposals which reflect the city's heritage whilst delivering a contemporary facility to serve the city for many years to come. The exhibition week will include opportunities to meet the design team.

5.13. The feedback and key messages from this round of engagement will be considered by the design team. These findings will play a key role in shaping and informing the development of the design proposals ahead of the corporate director submitting a planning application later in the year.

## **6. Financial implications**

6.1 The report includes detailed financial information in paragraphs 4.9 to 4.29 based on the updated business case that shows £65 million capital investment. The table at paragraph 4.14 shows 4 scenarios giving a net revenue impact of between £0.550 million per annum to £1.340 million per annum.

6.2 The capital cost of the scheme includes £6.9 million contingencies and £2.9 million inflation allowance (6%); as the scheme progresses, contingencies will be updated to reflect the level of cost certainty. In addition to the capital cost of the scheme there are a number of key financial assumptions that underpin the 4 scenarios that also represent financial risks: -

- *The Capital receipt from the sale of 60% of the site.* The most recent valuation (including 40% affordable housing) is £26.4 million. This is reliant on grant funding to cover demolition and remediation of the site and is subject to market conditions at the point of sale. This funding will also not be achieved until after the new leisure centre is complete and therefore a higher level of funding will be required during the build period.
- *The expected improved financial performance of the new King Alfred.* This is estimated to be between £1.06 million and £1.450 million per annum. This estimate is reliant on the final design of the leisure centre, customer mix and the financial arrangements with the operator.

- *Grant from Homes England.* Advanced discussions with Homes England and the evidence of support for the 2019 scheme support this assumption. Demolition and remediation is required for the whole site, not just the housing element to unlock the development and therefore could contribute to the estimated £65 million leisure centre cost.
  - *The cost of borrowing.* The current assumptions include potential borrowing of between £38.6 million and £47.7 million with ongoing financing costs based on 4.5% annuity of between £1.95 million and £2.4 million per annum. Public Works Loan Board (PWLB) interest rates are currently projected to reduce over the next 2 years and the council's treasury team will aim to minimise interest costs. However there is a risk that PWLB rates do not reduce to this level. If rates are 1% higher, this will increase the financing costs by £0.300 million to £0.400 million per annum.
- 6.3 During the construction the council will no longer receive car park income from the site of approximately net £0.400 million per annum. Options for mitigating this loss and supporting users of the current leisure centre during the construction period are being explored. Any short term residual loss of income will need to be factored into the Medium-Term Financial Strategy (MTFS) subject to paragraph 6.5.
- 6.4 The financing costs during construction and the additional short-term funding until the capital receipt is realised will need to be included in the MTFS subject to paragraph 6.5. Every month of delay in realising the capital receipt after the leisure Centre completion will incur an additional £0.100 million interest cost.
- 6.5 The net costs to the revenue budget, once fully operational of between £0.550 million and £1.340 million with the base assumption being £0.89 million. This ongoing revenue cost along with the short-term costs identified in paragraphs 6.3 and 6.4 will be mitigated through the planned actions included at paragraph 4.24 that will deliver between £0.800 million and £1.250 million per annum both during the construction phase and once operational.
- 6.6 In July 2024, Cabinet approved £2.7 million to progress the project to planning application stage. The recommendation of this report is to release a further £2.3 million to take the project to planning including some enabling works. This allocations forms part of the overall £65 million project cost estimate. As the project progresses the financial implications will be updated in future reports to Cabinet before any final decision to proceed to contract.

Name of finance officer consulted: James Hengeveld  
Date consulted 08/08/25

## **7. Legal implications**

- 7.1 The Council has a power under s.19 Local Government (Miscellaneous Provisions) Act 1976 to provide recreational facilities within its area and a duty under the National Health Service Act 2006 to take such steps as it considers appropriate to improve the health of the people in its area. In addition, the Council has the general power of competence contained in section 1 of the Localism Act 2011 which allows the Council to do anything



that an individual may do subject to any statutory constraints on the Council's powers. None of the constraints on the Council's s.1 power are engaged by these decisions. The recommendations in this report are in keeping with these powers.

- 7.2 In respect of that part of the site to be sold for residential development, the Council has the power to dispose of that part of the site pursuant to section 123 of the Local Government Act 1972 which requires the Council to obtain the best consideration reasonably obtainable. The sale of the land will require a further decision by Cabinet.

Name of lawyer consulted: Siobhan Fry      Date consulted: (4/08/25)

## 8. Risk implications

- 8.1 A comprehensive approach to identifying, managing, and mitigating risks has been implemented as part of the project management process. This includes regular risk reporting to the project board from the project risk register. The current headline risks for the project are summarised below:

- **Budget:** As described in section 4, the design proposal which includes undercroft parking, an improved facility mix and more realistically priced demolition and enabling works costs requires a larger budget than initially agreed in July 2024. This paper seeks an increased budget, with the risk arising from the greater annual cost to the council mitigated through the new facility's capacity for greater revenue generation as set out in 4.13 – 4.18.
- **Capital receipt:** The financial viability of the project is in part dependent on maximising the capital receipt to be realised from the disposal of the remainder of the site (described in table 1). There is a risk that this could be impacted by changes in market conditions across the residential sector or regulatory changes. As noted in paragraphs 4.10, 4.20, and 4.21, the council commissioned an updated land valuation earlier this summer. This was done to ensure that the financial modelling for the project reflects a credible estimate the capital receipt. The capital receipt used in the paper also assumes full compliance with the council's affordable housing policy. To help ensure the potential capital receipt is maximised officers are in dialogue with Homes England about securing grant funding for the site (see below).
- **Homes England grant funding.** Realising the maximum value for the sale of part of the site for residential development will be dependent on securing grant funding for Homes England to support demolition and remediation works. Grant funding is also being sought to support enabling works for the new leisure centre part of the site. This risk is being mitigated through regular close liaison with Homes England, including site visits, with a view to securing grant funding as described in 4.21 – 4.22.

- **Programme delays / inflationary pressures.** A detailed delivery programme has been developed with the project team and main contractor, based on benchmarks of similar scale schemes and considering project specifics such as phasing, site constraints, coastal location etc. The construction phase of the programme includes suitable time allowances for high winds and downtime for cranes for example. The detailed cost plan contains allowances for inflation based on the overall delivery programme, and those allowances align with Building cost Information Service (BCIS) and other credible industry forecasts. The risk of programme delays (and inflationary pressures) can be considered in two parts; pre-contract and during the construction phase. Should there be any significant delays pre-contract, the risk of inflation increasing as the overall programme elongates remains with the council. Once in contract however, the risk of inflation is passed to the main contractor and only in the event of 'exceptionally inclement' weather would the contractor be granted an extension to the programme. An extension such as this would only allow time, and no additional costs, protecting the council as best as possible.
- **Delays at the planning application stage.** Whilst the planning application will relate only to the sport and leisure centre, not the separate residential development, the complexity of the site and the project could result in delays to the planning determination. This risk is being mitigated by the design team and planning consultants beginning early engagement with the planning authority, including a pre-app meeting on 12 June. The project team also met with the DesignPLACE review panel on 20 June, and feedback from that session has been informing the subsequent iterations of the design. Ahead of the planning application, a further round of public engagement on the proposed designs will take place as set out in 5.13 and 5.14.
- **Practical delivery issues on site.** The complexity and uncertainties associated with the site mean that delays and cost increased could result from issues associated with demolition / enabling works, rerouting of services, maintaining access to the electricity substation and related matters. These risks are being mitigated through site survey work and other relevant investigations commissioned through the design team.
- **Site management.** The constrained site, and proximity of the adjacent the A259 cycleways and groyne replacement projects pose a logistics risk. This risk is being mitigated through liaison with both projects to agree practical solutions. In particular, the project team is working with groyne replacement project team to agree use of the adjacent event space to provide temporary parking capacity.

## 9. Equalities implications

- 9.1 The council is committed to providing a range of opportunities and provision for residents across the city to participate in sport and be physically active. As set out in the Sports Facilities Investment Plan (SFIP), the successful delivery new West Hub Facility will be a key step in ensuring the council makes good on that commitment. With that in mind, the project team has

prioritised engaging with communities representing the diversity of the city and has considered how the delivery of a new facility can help in addressing health inequalities across the city.

- 9.2 Officers began development of an equalities impact assessment (EIA) shortly after the initial project inception in September 2022. The Equalities, Diversity, and Inclusion team closely participated in that initial work and remain involved as the project and EIA is developed further.
- 9.3 Early engagement, including the drop-in sessions at King Alfred highlighted the way in which some groups were notably under-represented, in particular younger people and those from minoritised ethnic groups. In response to that officers have sought ways to better engage those groups and to ensure that their voices are represented. That has included:
- commissioning work with the Trust for Developing Communities, as described to undertake focused community research communities representing minoritised ethnic groups and with young people
  - establishing a project reference group, seeking to ensure representation of younger people and those from minoritised ethnic groups, and those representing disabled people.
  - Engaging in face-to-face meetings with groups representing the diversity of the city, including groups representing:
    - **disabled people**, including: Dolphin's Disabled Swimming Club, Possability People East Sussex Sight Loss Council, and The Thomas Pocklington Trust, (a national sight loss charity)
    - **the LGBTQ+ community**, including: Out to Swim (LGBTQ+ swimming club), Older and Out (an over 50s LGBTQ+ group), Brighton and Hove LGBTQ+ Switchboard, and sports clubs with strong LGBTQ+ representation
    - **older and younger residents**, including: the Youth Council, the 'Active for Life Social Ping' group, and sports clubs oriented to older members.
- 9.4 Since the appointment of the professional design team in January 2025 further engagement has taken place with groups representing the diversity of the city. Specific activities have included:
- Focus group with representatives of disabled organisations, disabled people's sports clubs, and community groups
  - Reference group meetings, with members invited to follow up by sending through details of their requirements to be considered by the design team
  - A 'simulation walk' for members of the design team, arranged with the Sussex Sight Loss Council, to help the team understand the needs of visually impaired people.
- 9.5 From an equalities perspective, the engagement work and EIA have shown that a new facility will provide the potential to improve inclusivity and remove

barriers to participation in active leisure. For example, a purpose-built new facility will have improved access for disabled people – including being easier to navigate for blind and visually impaired users – which arose as a theme during engagement. Similarly, some women, faith groups, and older people we spoke to indicated a wish for greater privacy in changing areas, studios, and swimming pools, which can be provided with the new facility.

- 9.6 The findings from the engagement work have informed the development of the current design being presented today. By capturing and incorporating their view, the professional team have sought to ensure that their lived experience has informed the emerging designs, and will continue to do so throughout the design and build stage of the project.
- 9.7 The design team have also been asked to appoint a dedicated access specialist to review the design of the facility and the regenerated public realm outside

## **10. Sustainability implications**

- 10.1 Maximising sustainability and energy efficiency are two of the project's central objectives. Sustainability considerations were key in informing the choice of the design team and have continued to be priorities as the design has developed.
- 10.2 The core design team (GT3 Architects, Engenuiti structural engineers, and Van Zyl & deVilliers mechanical and electrical engineers) previously designed the [Eclipse Leisure Centre](#) for Spellthorne District Council – the first Passivhaus accredited wet and dry sport and leisure facility in the country. In developing the design for the new King Alfred facility, the team have adopted the same sustainability principles they used for the Eclipse centre and other facilities. They have also taken account of learning from those projects.
- 10.3 One key piece of learning has been the understanding that best value for money can be achieved by applying Passivhaus principles without necessarily satisfying all the conditions for accreditation, some of which can add considerable capital costs which will not be proportionately recovered with future revenue savings. With that in mind, the new facility has been designed to meet the BREEAM 'excellent' standard (a planning requirement) and to reflect the principles of the UK Net Zero Carbon Buildings Standard. The design team and officers feel that approach will offer the optimum balance to deliver a highly sustainable new facility whilst keeping the project affordable and budget-focussed.
- 10.4 Working with the design team, we have developed a sustainability brief for the construction of the facility. This brief stipulates the requirements against which the main contractor must deliver. The brief sets out the council's commitment to a design which reflects current best practice and forward-thinking approaches in sustainable architecture and engineering. The brief is also clear that the building should visibly express the council's commitment



to a low-carbon, climate-resilient future, acting as a demonstration project for innovation and environmental responsibility within the community.

10.5 Specific requirements set out in the brief include:

- the building must achieve a structural upfront carbon (A1-A5) of no more than 230 kgCO<sub>2</sub>e/m<sup>2</sup> and a total upfront carbon (A1-A5) no more than the limit set out in the UK Net-Zero Carbon Buildings Standard.
- the operational (B6-B7) and whole life (A1-C4) carbon for the entire building must be assessed and reported. All carbon values must be provided at RIBA Stages 3 and 4, and verified post-completion, using a recognised methodology.
- proposed low-carbon strategies for the new facility must not result in carbon burden-shifting - for example, reducing structural emissions at the expense of significantly increasing emissions in other elements or life cycle stages.
- all materials used in the project must be specified and selected to minimise embodied carbon and environmental impact throughout their life cycle. This includes reducing the building weight by swapping heavy floor/wall constructions for timber, hybrid timber/steel frame to create a lighter building. This not only reduces the carbon impact of the building above ground, but the lighter building weight also enables a lower-carbon foundation to be used. In particular, timber should be considered a primary structural and finishing material where appropriate. This includes the use of cross-laminated timber (CLT), glue-laminated elements, and sustainably sourced softwood.
- the project must prioritise circular economy principles, including selecting materials and systems that allow for future reuse, disassembly, and adaptability where appropriate, utilising reused, reclaimed and repurposed materials, and deconstructing the existing building wherever possible, rather than undertaking wholesale demolition.
- the design and construction must incorporate reclaimed, recycled, and site-won materials wherever technically and economically viable.
- components and materials from the existing building (green roof area) should be deconstructed rather than demolished wherever possible. These materials must be salvaged, sorted, graded, and reused, either within the project or elsewhere.

10.6 In addition to using materials and construction techniques to minimise the embodied carbon in construction, the facility has also been designed to be sustainable in operation. Specific energy and carbon saving innovations and approaches include:

- maximising the benefits of building orientation and form. Building orientation impacts the heating & cooling loads and helps to balance where areas of glazing are useful for internal room use. Locating the pools at the south of the building maximises solar gain for the pool halls, whilst locating the studios and sports hall to the north makes cooler temperatures easier to maintain. The overall compact form of the design minimises thermal losses.
- making best use of thermal zoning. By properly distributing hot - cold zones through the building reduces the temperature differential between spaces. This helps mitigate unwanted internal heat gains and reduces overall system demand.
- investigate the use of micro-filtration system in place of a traditional media bed filtration system for the pool water. This reduced the energy demands by up to 40% in addition to requiring less space in the plant room and reducing the need for chlorine and other chemicals.
- designing-in higher U-Values (which reflects insulation performance). While increased U-values marginally increase the embodied carbon (additional insulation thickness), the payback period on reduced operational energy / carbon can offset this as quickly as 12 months.
- designing-in high levels of airtightness. Up to 40% of all energy usage in a building is through unwanted air infiltration; either through hot air leaking out of the building causing more energy use to reheat the inside space, or through hot air coming in the building causing more energy usage to cool the space. By increasing the air tightness of the building, those losses can be reduced significantly.
- maximising the use of photo voltaic (PV) roof-mounted panels for renewable electricity generation. The roof area will also be planted as a green roof where possible, whilst leaving sufficient space for roof-mounted plant such as air source heat pumps (ASHPs).
- In addition to helping deliver the project's biodiversity net gain requirements, the green roof will complement the PV panels by helping reduce the ambient temperature on the roof and hence improving the panels' efficiency.
- using air source heat pumps (ASHP) to ensure the new facility is fossil-fuel free.

10.7 The decision to use an ASHP system in preference to a ground source heat pump (GSHP) or other alternatives is informed by a feasibility study commissioned with specialist consultants Genius Energy Labs (GEL). Their report concluded that an open loop ground source heat pump (GSHP) system is unlikely to be permitted by Environmental Agency due to the proximity to sea and lack of impermeable layer preventing saline intrusion. Further, it was estimated that the available land is insufficient to locate the required number of open loop boreholes. As such the option of open loop GSHP system using either borehole or seawater was considered unviable.

10.8 The report proposed that a closed loop GSHP system interacting with the ocean is possible in theory but poses many practical challenges.

Construction of sea loop points at the proposed site location would be difficult due to sandy nature of the beach and temporarily disrupt the use of the beach for leisure. GEL advised that although possible to exchange heat with the ocean, they would strongly advise against it for the reasons explained.

- 10.9 GEL considered the ground capacity local to the site and estimated that to serve the whole development using closed loop boreholes will require a total of 168 boreholes at 12m spacing and a depth of approximately 300m. The constrained sight does not provide adequate space to accommodate this number of boreholes.
- 10.10 The report concluded with a recommendation use a hybrid of GSHPs with closed loop boreholes for the base load supplemented by ASHPs, or only use ASHPs. GSHPs offer higher efficiencies than ASHPs, but come with significant added complexity and cost. With that in mind, the design team's recommendation at Stage 2 was to proceed with an ASHP based design, with the flexibility to incorporate limited GSHP at a later stage in the design if required.

## 11. Health and Wellbeing Implications:

- 11.1 Improving health and wellbeing for the local community is a key priority for the King Alfred regeneration project and supports the wider objectives of the Sports Facilities Investment Plan.
- 11.2 The Brighton and Hove 'Health Counts' survey for 2024, published earlier this year, provides compelling evidence for the need for a new sport and leisure facility in the city. The report shows that of those surveyed, just 36 per cent had undertaken 150 minutes or more of fitness activity (e.g. gym, fitness class, or dance) in the previous 7 days. Whilst this is definitionally not quite the same as the NHS guidance for '150 minutes of moderate intensity activity a week' it does signal that more can be done in the city to encourage active leisure.
- 11.3 The business case completed last year examined the health and wellbeing benefits that the new facility could help deliver. This included examining the direct benefits of having more residents participate in active leisure, as illustrated by table 4 below.

<b>Table 4. Physical and mental health outcomes associated with increased physical activity</b>	
<b>Outcome</b>	<b>Relationship with 150+ minutes of moderate intensity sport and physical activity</b>
CHD and stroke	35% reduced risk
Type 2 diabetes	40% reduced risk
Breast cancer	20% reduced risk
Colon cancer	20% reduced risk
Dementia	30% reduced risk
Clinical depression	30% reduced risk
Back pain	25% reduced risk

Hip fractures	52% reduced risk
All outcomes	Linear dose-response relationship between fairly active (30 – 149 mins) and a reduced risk of the above outcomes
Good health	14.1% more likely to self-report good health
Sports injury	Increased risk of sports-related injury

*Department of Health and Social Care. (2019). UK Chief Medical Officers' Physical Activity Guidelines*

- 11.4 The business case showed that the new facility had the potential to deliver significant social benefits such as reduced instances of cardiovascular illnesses, stroke, diabetes, and as well as economic benefits associated with reduced costs to the exchequer from dealing with the consequences of those outcomes. A summary of those results is set out in the July 2024 Cabinet paper.

## Other Implications

### 12. Procurement implications

- 12.1 Following Cabinet's decision in July 2024 to proceed with the project the officer team undertook programme of soft market engagement throughout July, August and September officers to investigate and evaluate the procurement approaches available for the professional team.
- 12.2 That process entailed examining the available procurement frameworks (e.g. Pagabo, Scape, Crown Commercial Service, and others), considering a restricted tender process, engaging with clients who had recently procured architects and professional teams for similar projects, and visiting a number of sports and leisure centres either recently completed or currently in construction including: [Spelthorne Leisure Centre](#) (Passivhaus accredited), Cranleigh Leisure Centre, [Winchester Sport and Leisure Park, Ravelin Sports Centre](#) and Kingston Leisure Centre and discussing the key learnings with the clients, architects, and contractors.
- 12.3 The outcome of the engagement was that officers recommended that the architect and professional team for the King Alfred Regeneration Project be procured through the [UK Leisure Framework](#) which is accessed through development partner [Alliance Leisure](#). A decision was taken under delegated authority by the Corporate Director City Services to use the framework on 29 October 2024 in accordance with the delegated authority agreed at the July Cabinet meeting.
- 12.4 Once the procurement route was chosen, officers worked with Alliance Leisure to identify the architect and lead consultants best suited to taking forward the next stages of the design of the new King Alfred facility. From that discussion, a lead professional team was identified which was then considered and agreed by the council's procurement team and the Director acting under delegated authority.



### **13. Crime & disorder implications:**

- 13.1 A new facility will provide an opportunity to positively influence crime rates. Research shows that good quality sports and leisure facilities help to build community cohesion and can assist in reducing levels of anti-social behaviour and other low-level nuisance and criminality.

### **14. Conclusion**

- 14.1 Following their appointment at the start of the year, the design team have developed a design for the new King Alfred leisure centre up to concept design (RIBA stage 2). The proposed design reflects the original vision for the facility as set out on the SFIP but adapts that vision to make best use of the site take account of engagement with operators, sports' governing bodies, and the grassroots sports clubs that use the current King Alfred.
- 14.2 The estimated total project cost for the new facility represents an increase from the proposals set out in the paper presented to cabinet last year. As noted in 4.13, that increase reflects a significantly enhanced specification, a more detailed understanding of the site conditions, a more realistic view of the costs of an undercroft car park, and cost inflation in the construction sector.
- 14.3 However, whilst representing a great capital cost, the new facility also offers the potential for much greater revenue generation. As explained in 4.10 – 4.11, the work done with our specialist sport and leisure consultants suggests that the new facility stands to generate an annual revenue surplus of £1m. This in turn is projected to make the net annual borrowing costs for the council substantively the same as they would be if a less expensive and commensurately lower specification facility were delivered.
- 14.4 Cabinet is asked to consider the information set out in this paper and supporting documents and agree that the project proceeds, along with the other recommendations as set out in section 2. With that agreement, the design team will work over the remainder of this year in developing the current design to stage 3 and 4a with a view to the planning application being submitted at the end of the calendar year.
- 14.5 The regeneration of King Alfred Leisure Centre is a key strategic investment supporting the council's health and wellbeing goals and delivering a high-quality, inclusive leisure facility through a placemaking approach. The project enhances connections between the new centre, surrounding open spaces, and residential areas, while enabling the release of land for much-needed housing. Collaboration with the newly established Seafront Investment Board ensures alignment with broader waterfront regeneration initiatives, securing lasting social, economic and environmental benefits for the city.
- 14.6 Further updates will be provided to cabinet in line with the project schedule as set out at 4.41.

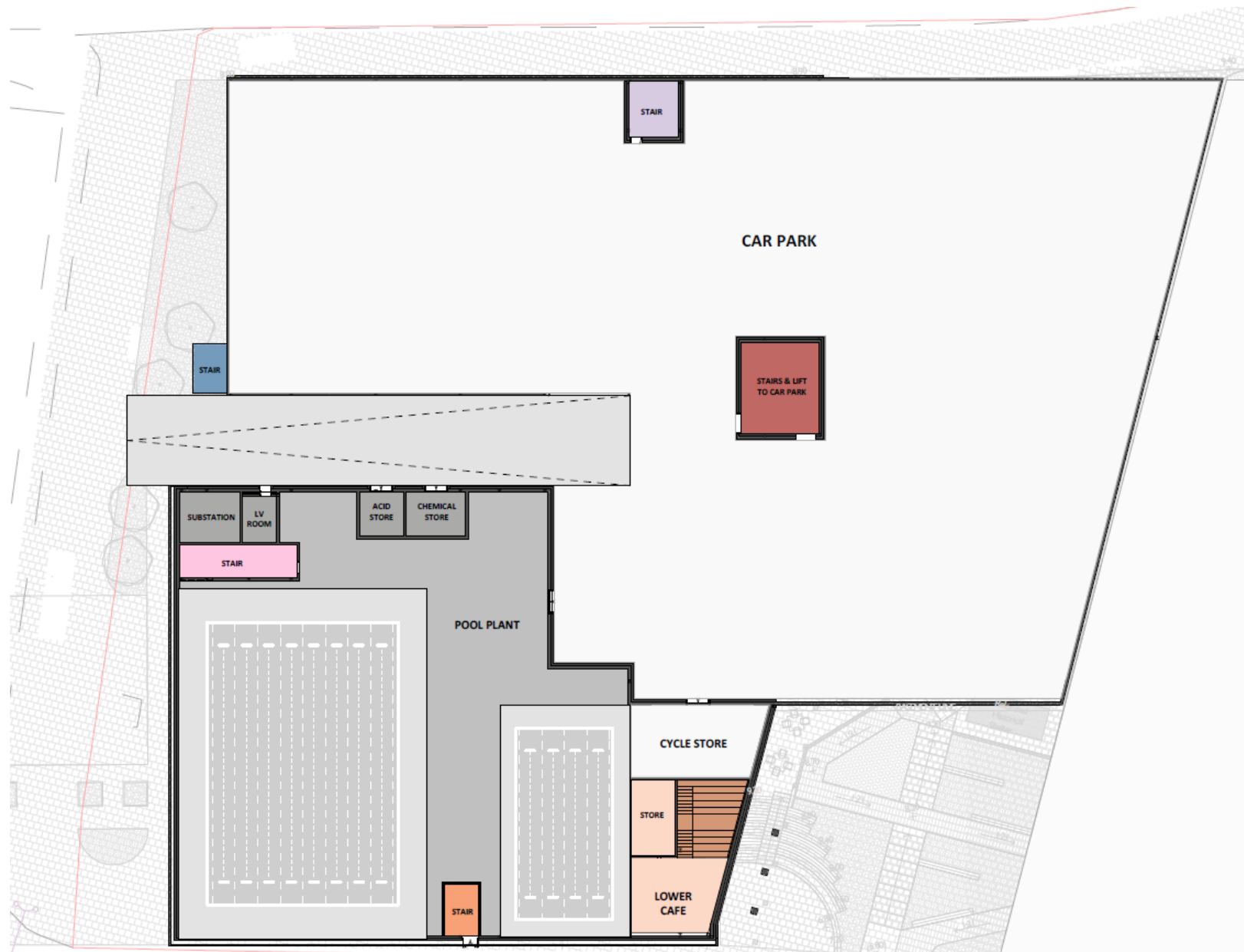
## **Supporting Documentation**

### **1. Appendices**

1. Appendix 1. General arrangement (GA) floor plans and images of the new facility
2. Appendix 2. Report from the April and May focus group sessions
3. Appendix 3. Summary of key messages from July sports clubs' engagement
4. Appendix 4. Sustainability brief
5. Appendix 5. Red line drawing of area of be demolished as part of the enabling works.

### **2. Background documents**

1. Brighton and Hove City Council [Sports Facilities Investment Plan 2021 to 2031.](#)
2. Equalities Impact Assessment (EIA)
3. Avison Young land valuations report June 2025
4. Stiles Harold Williams land valuations report August 2025
5. Continuum Sport and Leisure revenue projections July 2025
6. The Sport Consultancy revenue projections August 2025.



# The King Alfred Leisure Centre Regeneration Project

Cabinet Paper 25 September 2025

## Appendix 1. General arrangement (GA) drawings and images for the new King Alfred Leisure Centre



Brighton & Hove  
City Council





# The King Alfred Leisure Centre Regeneration Project

Cabinet Paper 25 September 2025

## Appendix 1. General arrangement (GA) drawings and images for the new King Alfred Leisure Centre



Brighton & Hove  
City Council



**The King Alfred Leisure Centre Regeneration Project**

**Cabinet Paper 25 September 2025**

**Appendix 1. General arrangement (GA) drawings and images for the new King Alfred Leisure Centre**



**Brighton & Hove  
City Council**









# The King Alfred Leisure Centre Regeneration Project

Cabinet Paper 25 September 2025

Appendix 1. General arrangement (GA) drawings and images for the new King Alfred Leisure Centre



Brighton & Hove  
City Council





# King Alfred Leisure Centre

## Public and Stakeholder Engagement Report

**May 2025**



**alliance**leisure



**Active  
Insight**

# Table of Contents

Project Background	P.3
Executive Summary	P.4 - 5
Public Engagement – Residents and Community Groups – Key Findings	P.6 – 14
Stakeholders – Sports Groups and Clubs – Key Findings	P.15 – 22
Stakeholders – Community Groups – Key Findings	P.23 – 30
Stakeholders – Disability Groups – Key Findings	P.31 – 33
Acknowledgements	P.34

# Project Background

This report summarises the key findings of the public and stakeholder engagement groups undertaken for Brighton Council, on behalf of Alliance Leisure.

Active Insight, the industry leader in customer insight and market intelligence within the active leisure industry, is pleased to present this report.

The objective of these engagement groups was to explore attitudes and perceptions towards the proposed redevelopment of a new King Alfred Leisure Centre.

There were four sessions in total; one with current users of the centre and the others with stakeholders, including disability groups, community groups and clubs or organisations that hire or use the centre.

The sessions were conducted by Active Insight facilitators – Julie Allen and Marie Doherty – during the last week of April and the first week of May 2025. The groups were held in person, except for the disability session, which took place online.

# Executive Summary

The focus groups took place between the 26<sup>th</sup> of April and 6<sup>th</sup> May 2025. The sessions were arranged by council officers and Alliance Leisure.

For the public engagement sessions, attendees were recruited from current users, while stakeholders were identified and invited by the council.

Detailed notes from the sessions, along with a list of attendees, are available.





# Executive Summary

## Public Users

- ❖ Health, social connection, and inclusive fitness options were key priorities.
- ❖ Barriers included cost, poor transport links, and accessibility challenges.
- ❖ Strong desire for inclusive facilities, such as improved changing areas and a hydrotherapy pool.
- ❖ Mixed views on current operator; transparency and reinvestment were discussed.

## Sports Groups and Clubs

- ❖ Value reliable, well-maintained facilities to support team activity and club growth.
- ❖ Concerns about outdated spaces and lack of specialised equipment.
- ❖ Emphasised the need for bookable, multi-use spaces and co-location with health services.
- ❖ Desire for partnership in shaping programming and facility planning.

## Community Groups

- ❖ Physical activity was viewed as vital for social cohesion and wellbeing.
- ❖ Identified barriers include transport, session timing, and unclear communication.
- ❖ Need for flexible spaces and culturally appropriate sessions.
- ❖ Requested increased engagement in future planning and design.

## Disability Group

- ❖ Called for meaningful inclusion, sensory-sensitive design, and community identity.
- ❖ Key needs: hydrotherapy, accessible changing, specialist equipment, and staff training.
- ❖ Emphasised the importance of regular programming during standard hours.
- ❖ Strong focus on emotional wellbeing, safety, and feeling part of the community.

# Public Engagement – Residents and Community Groups – Key Findings

There were 14 attendees at this group including representatives from West Hove Forum and Friends of West Hove Lagoon. Below are the key findings from each of the themes discussed. Each topic was explored across four cross-cutting themes.

## Topic 1: What do you consider to be important for your wellbeing?

Category	Ideas and Feedback
User Experience, Accessibility and Inclusivity	<ul style="list-style-type: none"> <li>• Importance of swimming, sports hall, gym, salsa, yoga.</li> <li>• Need for flexible, multi-use/modular spaces dance, classes to adapt to new trends like Padel, Spin, Reformer/Pilates.</li> <li>• Desire for friendly gym environments with human-scaled spaces for older users avoiding design of vast spaces with rows of equipment.</li> <li>• Multi-functional spaces enable wider range of activities supporting an inclusive and diverse community across all age groups.</li> <li>• Retain ballroom (only sprung floor in Hove) space/large activity hall for special events, e.g., tea dance for older people to help alleviate loneliness and increase sociability.</li> <li>• Currently need to use several sites to maintain activity due to many facilities hired out to groups.</li> <li>• Accessibility by bike needs improvement - secure bike parking.</li> <li>• Pleased rebuilding on current site.</li> <li>• Concerned that there is a need to build bigger but believe that is not going to happen.</li> </ul>

# Public Engagement – Residents and Community Groups – Key Findings

Category	Ideas and Feedback
Sustainability and Environmental Considerations	<ul style="list-style-type: none"> <li>Concerns about the environmental cost of demolishing and rebuilding versus retrofitting the existing centre.</li> <li>Emphasis on building longevity (current building has lasted 85 years).</li> <li>Like to see that explore retrofit, e.g. Saltdean Lido - 1 year older than KALC, has been sympathetically restored and refurbished.</li> <li>Concern that new build won't last longer than 20 years.</li> <li>Sparrows will be displaced and would like to see a survey before the construction project starts as affecting 200/250 who 'reside' outside the gym and car park.</li> <li>A 'one type fits all' design won't work for this project, especially in relation to the marine environment.</li> </ul>

# Public Engagement – Residents and Community Groups – Key Findings

Category	Ideas and Feedback
Innovation and Technology	<ul style="list-style-type: none"> <li>• Desire for adaptable spaces to allow for future sport and fitness trends and innovation.</li> <li>• Ability to reconfigure spaces easily (modularity).</li> <li>• Playlist music choices in gyms to personalize user experience.</li> <li>• Streamline booking app across all sites in city.</li> <li>• Improve membership card system as current swipe system ineffective.</li> <li>• Incorporate an appealing design - not soulless.</li> </ul>
Operations and Maintenance	<ul style="list-style-type: none"> <li>• Concern that new spaces must be maintained well over time to avoid deterioration.</li> <li>• Need for clear, visible maintenance standards.</li> <li>• Building must withstand marine weather conditions (wind tunnels).</li> <li>• Current bike parking unsecure.</li> <li>• Need a building that allows people to have a better experience whatever the activity/service/facility.</li> </ul>



# Public Engagement – Residents and Community Groups – Key Findings

## Topic 2: What, if anything, prevents you from accessing the current centre?

Category	Ideas and Feedback
User Experience, Accessibility and Inclusivity	<ul style="list-style-type: none"> <li>• Limited parking, especially for disabled users.</li> <li>• Safety concerns for bike parking.</li> <li>• Swimming pool booked up with too many groups.</li> <li>• Gym isn't appealing as too small and smelly.</li> <li>• Reduced class offering especially yoga at weekend, dominated by Les Mills classes.</li> <li>• Inability to book as many classes as like.</li> <li>• Public transport access issues from west of the city - only 700 bus route along seafront as most are along Church Road.</li> <li>• Like to see better integration of public transport to access KALC.</li> <li>• General building tiredness and unfriendly spaces.</li> <li>• Weather (wind tunnels) affecting access.</li> </ul>
Sustainability and Environmental Considerations	<ul style="list-style-type: none"> <li>• Worry that if new builds aren't designed for the marine environment, they will degrade quickly.</li> </ul>

# Public Engagement – Residents and Community Groups – Key Findings

Category	Ideas and Feedback
Innovation and Technology	<ul style="list-style-type: none"> <li>• Poor app/website systems for booking classes and sessions across multiple sites;</li> <li>• Lack of intuitive digital booking experience, especially for older users.</li> </ul>
Operations and Maintenance	<ul style="list-style-type: none"> <li>• Building perceived as "run down" with limited maintenance - cold showers, leaks, broken infrastructure - not fit for purpose and can't be adapted any more.</li> <li>• Current building has been allowed to deteriorate over last 8 years.</li> <li>• Aging infrastructure like boilers poorly maintained until recent boiler installation.</li> <li>• Cleanliness standards have been poor, smelly gym, cockroach infestation.</li> </ul>

# Public Engagement – Residents and Community Groups – Key Findings

## Topic 3: What facilities or services are important to you for accessing the centre?

Category	Ideas and Feedback
User Experience, Accessibility, and Inclusivity	<ul style="list-style-type: none"> <li>• Retain swimming pools, gym, dance/yoga spaces, badminton, community meeting areas.</li> <li>• Restore the bowling alley for local use (without "disco" vibe).</li> <li>• Maintain ballroom facilities for social events like tea dances.</li> <li>• Maintain intimacy of spaces to avoid overwhelming users.</li> <li>• Provide variety of classes, not just one branded offering like Les Mills in place of classic yoga classes, especially at weekends.</li> <li>• Incorporate all existing facilities and new family facilities like soft play, climbing, ice rink, saunas and reinstate a restaurant-rooftop.</li> <li>• Ideally retain existing businesses on site - bowling club, independent gym, kid's amusements and golf.</li> <li>• Café affordability for all users .</li> </ul>
Sustainability and Environmental Considerations	<ul style="list-style-type: none"> <li>• Retrofit ideas inspired by Saltdean Lido instead of complete rebuild.</li> <li>• Consider not just the result but the carbon release of demolishing the building.</li> <li>• The current building is very well constructed with deep basements that have lasted 85 years.</li> <li>• Concerns the new building will be destroyed in 2-3 years.</li> <li>• Focus on reuse of structure where possible.</li> </ul>

# Public Engagement – Residents and Community Groups – Key Findings

## Topic 3: What facilities or services are important to you for accessing the centre?

Category	Ideas and Feedback
Innovation and Technology	<ul style="list-style-type: none"> <li>• Better integration of booking systems across sites.</li> <li>• Personal playlists in gym.</li> <li>• Use of solar panels and green energy features.</li> </ul>
Operations and Maintenance	<ul style="list-style-type: none"> <li>• Prioritize regular maintenance to avoid spaces falling into disrepair.</li> <li>• Belief that building been deliberately run down over last 20 years.</li> <li>• Concerns about the lack of plans in place to maintain new building after initial few years.</li> <li>• Building must be resilient and adapt to the harsh sea environment.</li> <li>• Reuse boiler/parts from existing facilities where possible.</li> </ul>



# Public Engagement – Residents and Community Groups – Key Findings

## Topic 3: What health-related facilities or services are important to you, and could be provided at the centre?

Category	Ideas and Feedback
User Experience, Accessibility, and Inclusivity	<ul style="list-style-type: none"> <li>• Interest in GP referrals for gym use - already in place, one of existing trainers at KALC very actively involved (successful centre in Eastbourne).</li> <li>• Multi-use spaces that could include fitness for physical rehabilitation (obesity, diabetes, recovery support).</li> <li>• Health-related cafes or shops e.g. chemist onsite, treat medical complaints onsite, physiotherapy, podiatry.</li> <li>• More inclusive services to complement leisure without replacing enjoyable experience.</li> <li>• Concern that square footage will be reduced with new building to 30% of total size of current space, however, overall useable space could be more due to current redundant spaces.</li> <li>• Question if good idea to mix enjoyable activities with medical services.</li> </ul>
Sustainability and Environmental Considerations	<ul style="list-style-type: none"> <li>• Consider using redundant spaces in current building in place of rebuild.</li> </ul>
Innovation and Technology	<ul style="list-style-type: none"> <li>• Technology for managing GP referrals and tracking fitness/health improvements through leisure activities.</li> </ul>
Operations and Maintenance	<ul style="list-style-type: none"> <li>• Any health service spaces must be clean, hygienic, properly maintained, and designed for medical-grade usage where needed.</li> </ul>

# Public Engagement – Residents and Community Groups – Key Findings

## Additional Notes

- ❖ Concerns were raised that developers had already been appointed, although artist's impressions were not yet available.
- ❖ Some participants expressed concern about Freedom Leisure managing the contract and charging high fees without visible reinvestment. However, others noted that profits are reinvested after the management fee is deducted.

# Stakeholders – Sports Groups and Clubs

## – Key Findings

The following clubs were invited to attend - Brighton and Hove Boxing, , Brighton Stormers Roller Hockey, Swimming Club, Water Polo, Dolphins Disabled Swimming Club , Badminton, Roller Derby, City of Brighton &Hove Swimming Club

### Topic 1: What do you consider to be important for your overall wellbeing?

Category	Ideas and Feedback
User Experience, Accessibility and Inclusivity	<ul style="list-style-type: none"> <li>• Access to inclusive facilities for all ages, genders and disabilities (e.g., hearing/visual impairments, Parkinson's, additional learning needs).</li> <li>• Space is vital: enough room for sport safety (e.g., badminton and pickleball need adequate runoff areas and safe court separation).</li> <li>• Independence is key for older or less able users - safe pool access, working lifts, spacious changing/shower facilities.</li> <li>• Protection and inclusion for trans and LGBTQ+ users via gender-neutral facilities.</li> <li>• Need for social interaction, combating loneliness and building community ("we all need a home").</li> <li>• Safe, welcoming environments, especially during darker hours (concern over walking to cars at night).</li> <li>• Continuity and identity: preserving long-established community clubs like boxing.</li> </ul>

# Stakeholders – Sports Groups and Clubs

## – Key Findings

Category	Ideas and Feedback
<b>Sustainability and Environmental Considerations</b>	<ul style="list-style-type: none"> <li>Concerns about facility inefficiencies and underutilised dead spaces.</li> <li>Requests for better use of space for multi-generational use and intergenerational sustainability.</li> </ul>
<b>Innovation and Technology</b>	<ul style="list-style-type: none"> <li>Highlighted importance of sports tourism and showcasing innovative programmes (e.g., adaptive boxing).</li> <li>Use of the centre as a platform for wider impact via nationally/internationally recognised programmes and events - swimming, boxing, pickleball.</li> </ul>
<b>Operations and Maintenance</b>	<ul style="list-style-type: none"> <li>High value placed on keeping all ages and demographics engaged through programming and inclusive planning.</li> <li>Importance of multipurpose space that doesn't feel overcrowded or unsafe.</li> <li>Consideration/better scheduling of activity zoning to avoid noise/light clashes (e.g., curtain safety and loud music from adjacent classes).</li> </ul>



# Stakeholders – Sports Groups and Clubs

## – Key Findings

**Topic 2: What, if anything, prevents you from accessing the existing leisure centre?**

Category	Ideas and Feedback
User Experience, Accessibility and Inclusivity	<ul style="list-style-type: none"><li>• Lack of sufficient parking, unaffordable fees (both for activity and parking) and limited public transport.</li><li>• Long waiting lists and oversubscription for some facilities.</li><li>• Lack of appropriate access (e.g., pool entry for those unable to use steps, cycling facilities, gender-neutral spaces).</li><li>• Women felt some public facilities and spaces (like the seafront and lawns) were male-dominated and unwelcoming.</li><li>• Ineffective and non-user-friendly booking systems.</li></ul>

# Stakeholders – Sports Groups and Clubs

## – Key Findings

Category	Ideas and Feedback
<b>Sustainability and Environmental Considerations</b>	<ul style="list-style-type: none"> <li>• Issues with temporary plastic taping for court markings—unsustainable and wasteful.</li> <li>• Broken toilets and ongoing maintenance issues (sewage, leaks) leading to environmental degradation and health hazards - already seen in new Lawn's facilities.</li> </ul>
<b>Innovation and Technology</b>	<ul style="list-style-type: none"> <li>• Booking system needs overhaul as not user friendly.</li> </ul>
<b>Operations and Maintenance</b>	<ul style="list-style-type: none"> <li>• Facilities (e.g., lifts, toilets, showers) not reliably functional; repairs take too long.</li> <li>• Concerns about safety (e.g., slope used as toilet, poor external lighting).</li> <li>• Shared spaces (e.g., NHS stroke rehab vs. badminton) cause acoustic conflicts and reduce user enjoyment.</li> </ul>

# Stakeholders – Sports Groups and Clubs – Key Findings

**Topic 2b: What facilities and services are important to you for accessing the leisure centre?**

Category	Ideas and Feedback
User Experience, Accessibility and Inclusivity	<ul style="list-style-type: none"><li>• Provision of discrete, dedicated spaces for clubs and programmes (e.g., boxing gym, pickleball courts, community health groups).</li><li>• Better layout for inclusive access (e.g., changing rooms, showers, pool access).</li><li>• Seating for spectators and families to engage in the space.</li><li>• Affordable and accessible healthy café/restaurant.</li><li>• Clearly marked, permanent court lines for activities like pickleball.</li><li>• Provision for a "home" environment for long-standing clubs with deep community roots.</li></ul>

# Stakeholders – Sports Groups and Clubs

## – Key Findings

Category	Ideas and Feedback
<b>Sustainability and Environmental Considerations</b>	<ul style="list-style-type: none"> <li>• Permanent, eco-friendly court markings instead of single use plastic overlays.</li> <li>• Efficient layout and design to minimize environmental impact and wasting space as seen currently at KALC.</li> <li>• Open discussion about improving energy and resource use.</li> </ul>
<b>Innovation and Technology</b>	<ul style="list-style-type: none"> <li>• Requests for a modern, multi-use space that can accommodate changing trends.</li> <li>• Enable sports tourism and reputation-building through modern, flexible venues.</li> <li>• New design to consider the impact of windows and glare for both activities and communal areas for visually impaired.</li> <li>• Vending to be better considered not just an add on.</li> </ul>
<b>Operations and Maintenance</b>	<ul style="list-style-type: none"> <li>• Adequate soundproofing for both shared spaces and studio classes with loud music.</li> <li>• Facilities designed to be easier and cheaper to maintain.</li> <li>• Appropriate storage for activity equipment.</li> <li>• Efficient design to ensure facilities can be used by various groups simultaneously without interference.</li> </ul>



# Stakeholders – Sports Groups and Clubs

## – Key Findings

**Topic 3: What community health-related services are important to you and could be delivered at the leisure centre?**

Category	Ideas and Feedback
User Experience, Accessibility and Inclusivity	<ul style="list-style-type: none"><li>• Support services for mental health, neurodiversity and loneliness.</li><li>• Social prescribing opportunities via sport (e.g., pickleball, boxing).</li><li>• Inclusive programmes for dementia, rehabilitation and disabilities.</li><li>• Need for a structured, permanent home base to deliver long-term community health improvements.</li><li>• Safe spaces that promote independence and participation.</li></ul>

# Stakeholders – Sports Groups and Clubs

## – Key Findings

Category	Ideas and Feedback
<b>Sustainability and Environmental Considerations</b>	<ul style="list-style-type: none"> <li>• Space needs to be cleaned and maintained to reduce disease spread (e.g., foot infections in showers).</li> <li>• Environmental maintenance (e.g., cleaning external access and site, reducing public urination) to improve wellness experience.</li> </ul>
<b>Innovation and Technology</b>	<ul style="list-style-type: none"> <li>• Mention of physiotherapy and potential integration with healthcare services—links to NHS and digital health collaboration - within site redevelopment.</li> <li>• New pool to have an adjustable height floor to open up opportunities for diving.</li> </ul>
<b>Operations and Maintenance</b>	<ul style="list-style-type: none"> <li>• Health facilities such as physiotherapy rooms, social prescribing hubs, drop-in NHS services (e.g., stroke rehab).</li> <li>• Toilets and plumbing systems that can cope with large events.</li> <li>• Flexibility to support both grassroots and health-focused programming (e.g., from early childhood to elderly care).</li> </ul>

# Stakeholders – Community Groups

## – Key Findings

The following groups were invited to attend - Beryl BTN Bike hire , Black Tri-Tribe, Sussex Sight Loss , Sussex Cricket, Community works, The Hangleton & Knoll Project , BD Manager at Brighton & Hove Buses and Metrobus., DINK Brighton Pickleball, CEO Soul Corporations, Brighton and Hove u3a.

### Topic 1: What do you consider to be important for your overall wellbeing?

Category	Ideas and Feedback
User Experience, Accessibility, and Inclusivity	<ul style="list-style-type: none"> <li>• Strong emphasis on access via safe cycling routes, with secure parking and close to the centre.</li> <li>• Priority for active travel (walking, wheeling, cycling) over private car use.</li> <li>• Support for high public transport accessibility, including possible bus diversions to the site.</li> <li>• Taxi rank.</li> <li>• Welcoming interior spaces: open, light-filled, with greenery.</li> <li>• Staircases should be as visible and usable as lifts - design should promote movement.</li> <li>• Access to sea swimming and safe connections between building and seafront.</li> <li>• Future design - no windows/designs with strong reflection or bright lights in communal areas and simple walkway designs for easy navigation around centre - for visually impaired.</li> </ul>

# Stakeholders – Community Groups

## – Key Findings

Category	Ideas and Feedback
<b>Sustainability and Environmental Considerations</b>	<ul style="list-style-type: none"> <li>Concerns about sea-level rise and storm damage impacting the site. Sea wall planned in the near future will help protect the centre from high tides and shingle.</li> <li>Building must be resilient to shingle, flooding and marine climate.</li> <li>Passive design elements like solar panels and heat recovery encouraged.</li> <li>Potential for '0' emission buses - financial constraints for the bus companies to develop without support.</li> <li>No more than 25% ratio parking/facility.</li> </ul>
<b>Innovation and Technology</b>	<ul style="list-style-type: none"> <li>Desire for seamless digital booking systems across leisure centres.</li> <li>Smart design for wayfinding and user personalization.</li> <li>High-quality Wi-Fi and potential for digital features like smart lockers and self-checkout.</li> <li>Like to see VR rooms/Immersive environments.</li> </ul>



# Stakeholders – Community Groups – Key Findings

Category	Ideas and Feedback
Operations and Maintenance	<ul style="list-style-type: none"><li>• Need for well-maintained spaces with high hygiene standards.</li><li>• Building should support easy maintenance access to reduce long-term costs.</li><li>• Dedicated service entrance to avoid interfering with public space.</li><li>• Multiple entrance to access building.</li></ul>

# Stakeholders – Community Groups

## – Key Findings

### Topic 2: What, if anything, prevents you from accessing the existing leisure centre?

Category	Ideas and Feedback
User Experience, Accessibility, and Inclusivity	<ul style="list-style-type: none"> <li>Limited and inconvenient public transport routes, especially from the west and north.</li> <li>No direct bus service (except the 700); walking from Church Road is difficult - street clutter must be kept to a minimum for visually impaired and disabled.</li> <li>Bus access to/from Brighton and surrounding areas to leisure centre is poor.</li> <li>Barriers for users with mobility scooters; lifts not always accessible.</li> <li>Car parking and drop-off zones are poorly designed.</li> <li>Unwelcoming building: spaces feel tired and unsafe.</li> <li>Shared spaces need to plan better with acoustics as impacts different activities.</li> <li>No ice rink: re-establish Brighton Tigers Ice Hockey team again.</li> <li>No cricket nets.</li> <li>Location of ceiling lighting for badminton is key to play effectively.</li> </ul>

# Stakeholders – Community Groups

## – Key Findings

Category	Ideas and Feedback
<b>Sustainability and Environmental Considerations</b>	<ul style="list-style-type: none"> <li>• Poor integration with active travel options discourages low-carbon journeys.</li> <li>• Lack of coordinated planning with wider transport network.</li> </ul>
<b>Innovation and Technology</b>	<ul style="list-style-type: none"> <li>• Outdated and unreliable booking systems deter use.</li> <li>• Poor user interface and lack of real-time information and bookings (especially difficult for older users).</li> </ul>
<b>Operations and Maintenance</b>	<ul style="list-style-type: none"> <li>• Longstanding issues with cold showers, leaks, poor acoustics, and smelly gyms.</li> <li>• Maintenance has been delayed due to redevelopment plans.</li> <li>• Current infrastructure is perceived as neglected.</li> </ul>

# Stakeholders – Community Groups

## – Key Findings

### Topic 2b: What facilities and services are important to you for accessing the leisure centre?

Category	Ideas and Feedback
User Experience, Accessibility, and Inclusivity	<ul style="list-style-type: none"> <li>• Desire for 50m pool, diving boards, sea-swim changing access, saunas, rooftop café, badminton, gym, boxing, pickleball, padel.</li> <li>• Multi-use halls to cover all activities and to have all courts marked out permanently - currently pickleball spending time and money on tape to mark the courts.</li> <li>• Dedicated inclusive and neurodiverse-friendly design features.</li> <li>• Space for lesser-known sports (e.g., cricket, showdown-relies on senses so needs quiet space).</li> <li>• Integration with existing groups like Boxing Club and local gym.</li> <li>• Like swimming to offer something that sets apart from all other pool facilities in Brighton and Hove.</li> <li>• Ensure accessible to all different groups not just first come first served.</li> </ul>



# Stakeholders – Community Groups

## – Key Findings

**Topic 2b: What facilities and services are important to you for accessing the leisure centre?**

Category	Ideas and Feedback
<b>Sustainability and Environmental Considerations</b>	<ul style="list-style-type: none"> <li>• Passive energy strategies like solar panels and water recycling.</li> <li>• Durable materials suitable for marine environment.</li> <li>• Retrofit options should be considered before full rebuild.</li> <li>• Ice rink could potentially heat the pool?</li> </ul>
<b>Innovation and Technology</b>	<ul style="list-style-type: none"> <li>• Spaces should be modular to adapt to changing trends.</li> <li>• Personalisation through playlists or apps.</li> <li>• Live capacity displays and digital signage.</li> <li>• Integration with transport (e.g., real-time bus/train data)</li> </ul>
<b>Operations and Maintenance</b>	<ul style="list-style-type: none"> <li>• Spaces should be designed for durability and low maintenance costs.</li> <li>• Future-proofing against marine wear and tear is essential.</li> <li>• Priority on cleanliness, comfort, and clear upkeep responsibility.</li> </ul>

# Stakeholders – Community Groups

## – Key Findings

### Topic 3: What community health-related services are important to you and could be delivered at the leisure centre?

Category	Ideas and Feedback
User Experience, Accessibility, and Inclusivity	<ul style="list-style-type: none"> <li>• Interest in GP referrals for physical activity and gym use.</li> <li>• Quiet spaces for mental health recovery and inclusive wellness.</li> <li>• Spaces to reduce stigma for those new to sport or managing chronic conditions.</li> </ul>
Sustainability and Environmental Considerations	<ul style="list-style-type: none"> <li>• Potential to share medical space with adjacent housing development.</li> <li>• Design for long-term community use and adaptability in response to changing health trends.</li> </ul>
Innovation and Technology	<ul style="list-style-type: none"> <li>• Tech integration for GP referrals and user tracking of health progress.</li> <li>• Online health and wellbeing resources tied to leisure services.</li> </ul>
Operations and Maintenance	<ul style="list-style-type: none"> <li>• High standards of hygiene and cleanliness essential.</li> <li>• Operational clarity on managing shared spaces with health partners.</li> </ul>

# Stakeholders – Disability Groups – Key Findings

The 4 attendees included people with visually impairments, mental health conditions, the mother of son with cerebral palsy, and a representative of the Parent Carer Council and mother to a child with Downs Syndrome.

## 1. What do you consider to be important for your overall wellbeing?

Participant 1 – Enjoys staying physically active through walking, parkrun and table tennis, which supports his mental wellbeing as a visually impaired person.

Participant 2 – Values social connection as a key part of maintaining his mental health.

Participant 3 – Stressed the importance of inclusive, accessible opportunities for children and young people to be active. Environmental factors like lighting and acoustics must be considered. Consistency, support and frequent sessions are essential for this community.

Participant 4 – Her son, who uses a wheelchair, needs social inclusion and access to local, familiar facilities. He currently feels excluded due to poor accessibility.

Group sentiment – Inclusivity is crucial for mental health. When children leave mainstream education, they risk isolation. Everyone should feel part of the community — they matter.

# Stakeholders – Disability Groups – Key Findings

## 2. What, if anything, prevents you from using the existing leisure centre?

Participant 1 – No major barriers but would welcome more opportunities and clearer communications about safe, inclusive activities for visually impaired people.

Participant 2 – Faces financial barriers and would benefit from a hub where activities are clearly signposted.

Participant 3 – The entrance, bus stop location and limited Blue Badge parking are significant access issues, especially in poor weather.

Facilities – There is a shortage of accessible changing rooms which need to be located near key areas like the pool and gym.

Environment – Lighting and acoustics must be carefully designed to support those sensitive to light and sound, including spaces like the café.

Operations – Queuing can be stressful for some users, particularly young people and should be addressed from a front-of-house perspective.

Scheduling – Quieter sessions are lacking and should be offered during standard hours rather than at inconvenient times.

Hydrotherapy – A hydrotherapy pool is a high priority; one parent highlighted the difficulty of accessing existing provision, a concern echoed by others.



# Stakeholders – Disability Groups – Key Findings

## 2b. What facilities and services are important for you to access the LC?

Specialist equipment for people using wheelchairs (example of upper body cycle and specialist gym kit that is accessible for those with disabilities).

Specialist knowledge of team members (operational consideration).

Clear and tactile markings on all equipment for those who are visually impaired, to enable tactile identification of essential information.

Good lighting (acknowledged this can be challenging for others who are sensitive to light but essential for those who are visually impaired).

Mental health groups – someone to check in on you if you haven't attended – a social group.

Hydrotherapy needs to be considered – this was a “plea from the heart” from a mother who continues to fight for her son to be able to access facilities and feel part of his community.

## 3. Additional community-health related services

Space for meetings and groups to come together (nutrition/mental health groups), physiotherapy.

A café is important for people to meet and socialise.

# Acknowledgements

With special thanks to the public, local stakeholder groups and their representatives, for their engagement and contribution to this piece of research.

## Contact Us



[julieallen@active-insight.org](mailto:julieallen@active-insight.org)



07940 937 866



## Summary of key messages from July sports clubs engagement

Club	Feedback	Next Steps	RAG
<b>Table Tennis</b>	<ul style="list-style-type: none"> <li>Supportive of scheme</li> <li>6no. tables in single space, ideally in studio rather than sports hall</li> </ul>	<ul style="list-style-type: none"> <li>Studio design to be developed</li> </ul>	<b>G</b>
<b>Badminton</b>	<ul style="list-style-type: none"> <li>Supportive of scheme but prefer black box sports hall with no natural light</li> <li>Currently use 5 badminton courts but would book 6 at a time if available</li> </ul>	<ul style="list-style-type: none"> <li>Review requirement for natural light in sports hall</li> </ul>	<b>G</b>
<b>Grace Eyre (Accessibility)</b>	<ul style="list-style-type: none"> <li>Quiet areas within gym space would appeal to users</li> <li>Option to have parents or carers at poolside or in the sports hall would be preferable.</li> </ul>	<ul style="list-style-type: none"> <li>Zoning of gym to create different activity zones to be reviewed</li> <li>Review potential options for poolside spectators</li> </ul>	<b>G</b>
<b>Swimming Clubs</b>	<ul style="list-style-type: none"> <li>Significantly more spectator and poolside seating required to host galas</li> <li>Two 25m pools would be the swim club preference with no leisure water</li> </ul>	<ul style="list-style-type: none"> <li>Options to increase spectator seating to be reviewed</li> <li>Review if the teaching pool can be increased from 17m</li> </ul>	<b>A</b>

**The King Alfred Leisure Centre Regeneration Project**  
**Cabinet Paper 25 September 2025**  
**Appendix 3.**



	<ul style="list-style-type: none"> <li>Parking issues need to be addressed if the venue is to be used for galas</li> </ul>		
<b>Sussex FA</b>	<ul style="list-style-type: none"> <li>Supportive of the proposals and would use the space for futsal training and tournaments at a local level if spectator seating was available</li> <li>Storage required for goals in sports hall</li> </ul>	<ul style="list-style-type: none"> <li>Review storage requirements for all sports within the Sports Hall</li> <li>Overlay futsal markings on sport hall layout</li> <li>Understand alternative options to bleacher seating for spectator seating within the sports hall</li> </ul>	<b>G</b>
<b>Gym Club</b>	<ul style="list-style-type: none"> <li>Lack of storage at the current King Alfred Leisure Centre stops the club competing at a higher level</li> </ul>	<ul style="list-style-type: none"> <li>Gym club to issue storage requirements for review</li> <li>Design to be review to understand if this could be accommodated in studio space</li> </ul>	<b>G</b>
<b>Brighton Rockers Roller Derby</b>	<ul style="list-style-type: none"> <li>Larger sports hall would be a significant improvement on the current offering at the existing King Alfred</li> <li>Line markings on the new sports hall floor would save a large amount of set up time at the start of each training session and may allow home games to be played at the King Alfred</li> </ul>	<ul style="list-style-type: none"> <li>LED floor not feasible for sports hall. Review flooring options with available markings</li> <li>Understand alternative options to bleacher seating for spectator seating within the Sports Hall</li> </ul>	<b>G</b>
<b>Dolphins Disabled Swim Club</b>	<ul style="list-style-type: none"> <li>Supportive of the new scheme once the use of easy access steps and pool pods was explained</li> </ul>	<ul style="list-style-type: none"> <li>Arrange visit to local schemes with pool pods if requested by swim club</li> </ul>	<b>G</b>

**The King Alfred Leisure Centre Regeneration Project**  
**Cabinet Paper 25 September 2025**  
**Appendix 3.**



	<ul style="list-style-type: none"> <li>• Supportive of the moveable floors as it would allow sessions to be held in both the main pool and teaching pool</li> </ul>		
<b>Sussex Cricket</b>	<ul style="list-style-type: none"> <li>• No provision at current King Alfred, so very supportive of new proposals for nets in sports hall</li> <li>• 2 or 3 lanes required</li> <li>• Storage required for roll out mats</li> </ul>	<ul style="list-style-type: none"> <li>• Review how many lanes can fit into each side of the sports hall to understand the preference for programming</li> </ul>	<b>G</b>
<b>DINK Pickleball</b>	<ul style="list-style-type: none"> <li>• Supportive of the scheme and would book all 6 courts in the sport hall</li> <li>• Noted that a barrier may be required between the back-to-back courts to stop balls rolling onto the neighbouring court</li> </ul>	<ul style="list-style-type: none"> <li>• Review options for storage of 1.2m dividers as used at other pickleball venues and tournaments</li> </ul>	<b>G</b>
<b>Wish Wudang Tai Chi</b>	<ul style="list-style-type: none"> <li>• No storage at current King Alfred but would be used if available at the new centre</li> <li>• Space required for more experienced class with 6 attendees (14ft clear height)</li> </ul>	<ul style="list-style-type: none"> <li>• Develop studio plans to provide enough space for Tai Chi classes</li> <li>• Review storage options and size requirements within studio spaces</li> </ul>	<b>G</b>





## Sustainability Brief for the King Alfred Regeneration Project

### 1. Upfront Carbon Target

The building must achieve a structural upfront carbon (A1-A5) of no more than 230 kgCO<sub>2</sub>e/m<sup>2</sup> and a total upfront carbon (A1-A5) no more than the limit set out in the UK Net-Zero Building Standard. These figures represent an absolute upper limit, not a target. The contractor is expected to strive for a lower value through optimisation of structure, material efficiency, and use of low-carbon materials.

In addition to these limits, the operational (B6-B7) and whole life (A1-C4) for the entire building must also be assessed and reported. All carbon values must be provided at RIBA Stages 3 and 4, and verified post-completion, using a recognised methodology.

Proposed low-carbon strategies must not result in carbon burden-shifting - for example, reducing structural emissions at the expense of significantly increasing emissions in other elements or life cycle stages. A whole-building perspective must be maintained to ensure genuinely low-carbon outcomes.

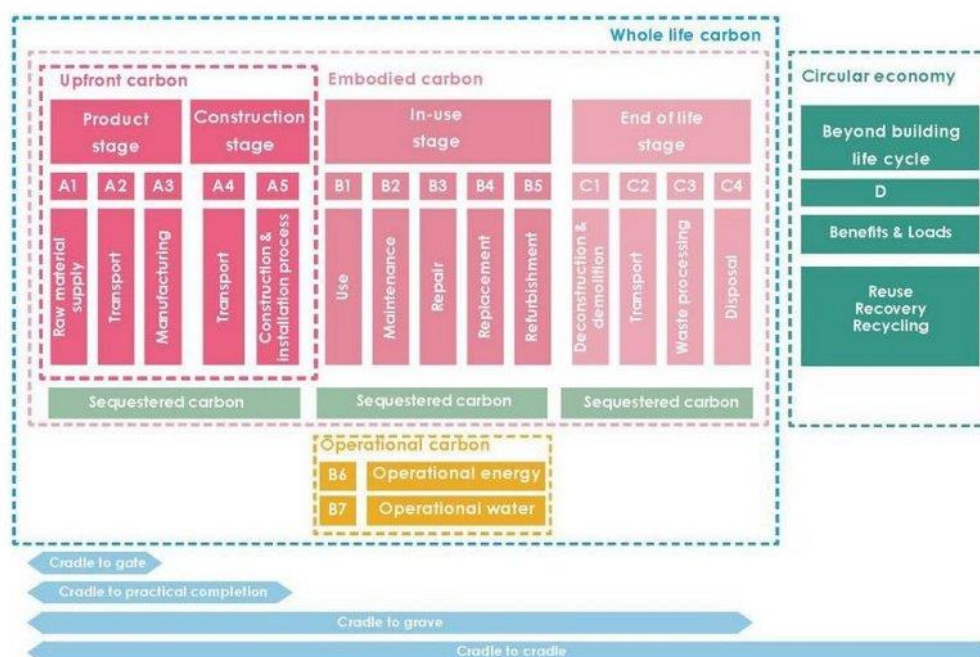


Figure 1 Life cycle stages

### 2. Sustainable Design Excellence and Civic Leadership

The design must reflect both current best practice and forward-thinking approaches in sustainable architecture and engineering. The building should visibly express the council's commitment to a low-carbon, climate-resilient future, acting as a

**Appendix 4.**

demonstration project for innovation and environmental responsibility within the community.

### **3. Circular Economy Principles**

The project must prioritise circular economy principles, including:

- Selecting materials and systems that allow for future reuse, disassembly, and adaptability
- Utilising reused, reclaimed and repurposed materials (see item 4)
- Limiting composite or highly bonded materials that hinder future separation or recovery
- Deconstructing the existing building wherever possible, rather than undertaking wholesale demolition.

### **4. Use of Reclaimed and Recycled Materials**

The design and construction must incorporate reclaimed, recycled, and site-won materials wherever technically and economically viable. This includes, but is not limited to, reclaimed structural steel, reused demolition arisings, recycled aggregates, and materials from council or contractor-held stockpiles. Consideration should also be given to reclaimed and recycled materials for non-structural elements of the building. The contractor must actively seek and incorporate reclaimed or surplus materials from:

- Other council-owned buildings and land
- Contractor stockpiles
- Third-party reuse schemes or suppliers.

### **5. Deconstruction and Demolition Waste Management**

Components and materials from the existing building should be deconstructed rather than demolished wherever possible. These materials must be salvaged, sorted, graded, and reused, either within the project or elsewhere.

All demolition arisings must be carefully separated, graded and prioritised for reuse on-site. Where reuse on this site is not feasible, materials and components should still be considered for use on other council projects or within regional reuse networks before disposal is considered.

The client expects that only minimal material will be taken offsite for disposal, and that a proactive approach to reuse and circular resource management is demonstrated throughout.

### **6. Investigation of Existing Structure**

The existing foundations and structural elements must be assessed at the earliest stage to determine reuse potential. These findings must be incorporated into structural design decisions.

### **7. Low Carbon Materials Specification**

**Appendix 4.**

All materials used in the project must be specified and selected to minimise embodied carbon and environmental impact throughout their life cycle. This includes prioritising materials with proven low-carbon credentials and sourcing options that

support circular economy principles. There is a preference for materials that store and sequester carbon.

Examples of approaches include, but are not limited to:

- Use of low embodied carbon concrete, incorporating alternative cement binders such as Limestone Calcined Clay Cement (LC3), and alkali-activated cements.
- Avoidance of materials with high carbon footprints or limited global availability (eg GGBS or PFA) that could cause unintended environmental impacts.
- Use of steel produced via electric arc furnace (EAF) processes or lower carbon blast furnaces
- Preference for materials with environmental product declarations (EPDs) and certification schemes demonstrating sustainability credentials.
- Selection of locally sourced, recycled, reclaimed, or sustainably harvested materials to reduce transport emissions and resource depletion.

The contractor shall collaborate with suppliers and the design team to optimise material choices to deliver the best environmental outcomes without compromising durability or performance.

**8. Use of Timber and Engineered Timber (e.g. CLT)**

Timber should be considered a primary structural and finishing material where appropriate. This includes the use of cross-laminated timber (CLT), glue-laminated elements, and sustainably sourced softwoods.

**9. Sustainable Drainage Systems (SuDS)**

The project must incorporate Sustainable Drainage Systems (SuDS) as a core part of the site-wide water management strategy. SuDS should be designed to:

- Manage surface water sustainably, reducing runoff rates and volumes to greenfield-equivalent levels or better
- Prioritise above-ground, nature-based solutions (e.g. rain gardens) over buried infrastructure wherever possible
- Use natural or low-carbon materials and maximise the multifunctional potential of landscape features
- Enhance site biodiversity and amenity value, contributing positively to the site's ecological and community environment




SuDS must comply with local authority and national planning guidance and be designed for long-term maintainability. The contractor is expected to work collaboratively with the design team and landscape specialists to deliver solutions that align with the council's climate resilience and sustainability objectives.





Red line drawing of area to be demolished as part of the enabling works



-  Existing surface car park highlighted in blue
-  Area for demolition highlighted in orange
-  Existing King Alfred facility highlighted in green



# Brighton & Hove City Council

## Cabinet

## Agenda Item 39

**Subject:** Greater Brighton Economic Board – Admission of New Member to the Board

**Date of meeting:** 25 September 2025

**Report of:** Cabinet Member for Finance and City Regeneration

**Contact Officer:** Name: Andy Hill  
Email: andy.hill@brighton-hove.gov.uk

**Ward(s) affected:** All

**For general release**

### **1. Purpose of the report and policy context**

- 1.1 The Sussex Chamber of Commerce wrote to the Chair of the Greater Brighton Economic Board (“the Board”) formally requesting to join the Board.
- 1.2 At the Greater Brighton Economic Board meeting on 9 July 2025, a decision was agreed that the Sussex Chamber of Commerce should become a constituent member of the Board, joining the Greater Brighton Business Partnership.
- 1.3 The main aim of the Greater Brighton Economic Board is for members to work together, and with external stakeholders, to promote and create the conditions for sustainable and inclusive economic prosperity, whilst at the same time transitioning the region towards net zero. This closely aligns with the Council Plan, particularly Outcome 1 (A city to be proud of). The Greater Brighton Economic Board plays a key role in growing a diverse and sustainable regional economy and the Board’s work includes identifying and capitalising on the economic opportunities that devolution will bring. Partnership working is a vital aspect of the Board’s success.
- 1.4 This report seeks approval from Cabinet to enable the Sussex Chamber of Commerce to become a member of the Greater Brighton Economic Board. Each local authority member of the Joint Committee is seeking equivalent approvals from their relevant decision-making bodies.

### **2. Recommendations**

- 2.1 That Cabinet agrees that the Sussex Chamber of Commerce joins the Greater Brighton Economic Board as a member of the Business Partnership.
- 2.2 That Cabinet notes that these changes to the membership and the consequent changes to the Heads of Terms are dependent on the decision of all the local authorities represented in the Joint Committee agreeing that the new member be appointed.

- 2.3 That Cabinet agrees to amend the Board's Heads of Terms to include Sussex Chamber of Commerce as a member of the Board and delegates the Director of Governance and Law to amend the Council's constitution to reflect these amendments once they have been formally approved by all the constituent authorities.

### **3. Context and background information**

- 3.1 The Greater Brighton Economic Board was founded in April 2014 as part of the Greater Brighton City Region's City Deal with Government.

- 3.2 The Board comprises the Greater Brighton Economic Joint Committee (GBEJC), on which the local authorities are represented; and the Greater Brighton Business Partnership (GBBP), on which the business, university and further education sectors, South Downs National Park Authority and NHS are represented. Meetings of the Board comprise concurrent meetings of the GBEJC and GBBP.

- 3.3 The following bodies are members of the Board:

- i. Adur District Council
- ii. Arun District Council
- iii. Brighton & Hove City Council
- iv. Crawley Borough Council
- v. Lewes District Council
- vi. Mid Sussex District Council
- vii. Worthing Borough Council
- viii. Adur & Worthing Business Partnership
- ix. Brighton & Hove Growth Board
- x. Chichester College Group
- xi. University of Brighton
- xii. University of Sussex
- xiii. South Downs National Park Authority
- xiv. NHS Sussex Integrated Care Board

- 3.4 GBEJC comprises the bodies specified in paragraphs 3.3(i) to (vii); and GBBP comprises the bodies specified in paragraphs 3.3 (viii) to (xiv) and subject the approval of the constituent members, Sussex Chamber of Commerce will be added to the GBBP.

- 3.5 Board membership has been extended three times since the Board's inception; Crawley Borough Council and Arun District Council joined the GBEJC in February 2018 and October 2019 respectively. NHS Sussex Integrated Care Board joined the GBBP in January 2025.

- 3.6 To ensure a consistent approach to new members, the Board agreed to give consideration to the following five questions:
- i. Does the organisation buy into the Board's agreed vision and priorities?
  - ii. Do they share economic characteristics and represent the Greater Brighton functional economic area?

- iii. Do they add capacity to help the Board deliver on its agreed vision and priorities?
  - iv. Will they add to the Board's reputation, in terms of legitimacy, standing and reach?
  - v. Are they going to actively participate and commit resource to supporting the Board and deliver the work programme?
- 3.7 Sussex Chamber of Commerce is the accredited voice of business across Sussex. Established in 1945, the Chamber has built an 80-year legacy of supporting local enterprises, from ambitious startups to long-standing manufacturers, by offering an integrated suite of services designed to help businesses grow, trade internationally, and influence policy. As a member of the British Chambers of Commerce network, Sussex Chamber delivers expert advice on importing and exporting—handling everything from Certificates of Origin and EUR.1 movement certificates to ATA Carnets—while also providing accredited training in customs procedures and regulatory compliance. Through its comprehensive programme of networking events, sector-specific forums, and the widely circulated Business Edge magazine, Sussex Chamber fosters collaboration between SMEs, corporates, academia, and government. Moreover, it acts as a powerful advocate for the region's business community, liaising directly with decision-makers in Westminster, Brussels, and beyond to ensure the concerns and opportunities of Sussex firms are heard at the highest levels.
- 3.8 The Chamber has expressed an interest in becoming a formal member of the Board, which is significant as the region moves towards establishing a Strategic Mayoral Authority. It would also forge a stronger connection between the Board and the local business community.

### **Does the organisation buy into the Board's agreed vision and priorities?**

- 3.9 Sussex Chamber of Commerce has a vision “to support and drive sustainable economic growth and champion key issues in Sussex”.
- 3.10 As the largest business membership organisation in Sussex, the priorities are to allow businesses to:
- Grow – through business support, discounted services and through networking forums and events;
  - Develop skills – to increase skills and knowledge, through training courses and through the Local Skills Improvement Plan work to reduce skills gaps challenges, working with providers and education to address gaps;
  - Discover global markets – to unearth export and import prospects through its international trade services to allow businesses to export and import;
  - Influence business – through its campaigns by having a voice.
- 3.11 The Sussex Chamber's priorities are:
- Global Britain – open the door to expansion and exports;
  - People and Work – attracting and retaining people with the right skills and addressing skills gaps;



- Local Economy of the Future – making Sussex the best place to build and grow a business;
- Green Innovation – driving sustainability and the climate agenda for a better future;
- Digital Revolution – better connectivity, more efficient processes and skilled employees.

3.12 Its vision and priorities are aligned with the Board, having a focus on economic development, the environment, climate change and infrastructure.

**Do they share economic characteristics and represent the Greater Brighton functional economic area?**

3.13 Sussex is a vibrant and diverse economy. Businesses have no borders, and many businesses work with local, national and global supply chains. Having two airports, two international seaports and three Universities in Sussex, Sussex Chamber works across the county (as well as with its counterparts across the UK) to ensure businesses are aware of opportunities to drive sustainable, inclusive economic growth.

**Will they add to the Board's reputation, in terms of legitimacy, standing and reach?**

3.14 Sussex Chamber of Commerce covers the entirety of Sussex. As an Accredited Chamber of Commerce, and part of the British Chamber network, which sits at the heart of 51 county Chambers in the UK, it helps represent the business voice in government. Sussex Chamber also has links with over 75 global British Chambers, providing businesses with essential links locally, regionally and internationally.

3.15 Sussex Chamber celebrated its 80th year in July 2025, having supported businesses since 1945. Sussex Chamber is also an Accredited Chamber which undergoes a strict governance review by the British Chambers. Sussex Chamber also holds licences in export documentation and customs declarations, to ensure businesses have the right paperwork and can move their goods and shipments around the world.

**Are they going to actively participate and commit resource to supporting the Board and deliver the work programme?**

3.16 The Sussex Chamber will actively participate and commit resource to supporting the Board and deliver the work programme as this will help support and drive sustainable economic growth.

**Governance**

3.17 Sussex Chamber of Commerce attended the April Board meeting and a Chamber Board member is part of the Sussex Energy Partner Group to provide the business/skills voice. They are attending Sussex Energy meetings and playing an active role, so are already participating in and adding value to the Board's work. The Chamber have nominated a

prospective representative to sit on the Board as well as a deputy and have also nominated a member to sit on the Greater Brighton Programme Board.

#### **4. Analysis and consideration of alternative options**

- 4.1 The only alternative option is for the Board's membership to remain as it is currently. For the reasons outlined in paragraphs 3.7 to 3.17, the Greater Brighton Economic Board took the decision to extend membership to the Sussex Chamber of Commerce.

#### **5. Community engagement and consultation**

- 5.1 The Board was consulted on the membership request from the Sussex Chamber of Commerce and took the decision to extend the membership. The governance committees of constituent Board members are being consulted given the required change to the Heads of Terms.

#### **6. Financial implications**

- 6.1 There are no financial implications arising directly from this information report.

Name of finance officer consulted: Ishemupenyu Chagonda  
Date consulted (30/07/25):

#### **7. Legal implications**

- 7.1 The GBEJC which forms part of the Board is a joint committee established pursuant to Section 102(1)(b) of the Local Government Act 1972. Cabinet has authority to approve the extension of membership of the Board together with the amendment to the Heads of Terms (subject to approval from the constituent members of the Board) to include Sussex Chamber of Commerce as a GBBP member under Part 2E Section C paragraph 1.5(k) of the Constitution.

Name of lawyer consulted: Siobhan Fry  
Date consulted (31/07/25):

#### **8. Risk implications**

- 8.1 As set out in this paper, the Board has agreed to invite the Sussex Chamber of Commerce to take up membership of the GBBP. Sussex Chamber is the accredited voice of business in Sussex and was established 80 years ago. As such it is recognised that Sussex Chamber will add an important representative business voice to the Board.
- 8.2 In terms of managing risk, the greatest issue is that not all of the constituent authorities agree to amend the Heads of Terms (as set out in this report's recommendations). As the matter has already been considered and agreed at the Greater Brighton Economic Board, it is considered that this risk has been suitably mitigated.

## **9. Equalities implications**

- 9.1 Extending the Board's membership to the Sussex Chamber of Commerce will broaden the diversity and focus of the organisations represented, as the Board is comprised largely from public sector bodies. The Sussex Chamber of Commerce works with all businesses, regardless of sector or ownership and recognises the importance and value of Sussex's diverse economic base. Ensuring all business voices are represented is an important part of the Sussex Chamber of Commerce joining the Board.

## **10. Sustainability implications**

- 10.1 In July 2024 the Board launched Sussex Energy, a mission to achieve energy neutrality in Greater Brighton and wider Sussex area by 2040. The mission will help Board members and wider stakeholders transition towards green energy and realise their net zero ambitions. The Sussex Chamber of Commerce also has ambitious targets linked to net zero and have already been involved in shaping the Sussex Energy work. As a membership organisation, the Chamber will be able to be a strong advocate for the work of Sussex Energy through its extensive business network.

## **11. Conclusion**

- 11.1 Cabinet is asked to note the benefits afforded by the Sussex Chamber of Commerce joining the Board, and accordingly approve the extension in membership by agreeing the change to the Board's Heads of Terms.

## **Supporting Documentation**

### **1. Appendices**

1. Heads of Terms for the Greater Brighton Economic Board

## **Appendix 1: Heads of Terms for Greater Brighton Economic Board (January 2025)**

### **1. Establishment, Purpose and Form**

- 1.1. The Greater Brighton Economic Board (“The Board”) shall be established from the Commencement Date.
- 1.2. The over-arching purpose of the board is to bring about sustainable economic development and growth across Greater Brighton (‘the City Region’). To achieve this, the principal role of the Board is to co-ordinate economic development activities and investment at the regional level.
- 1.3. The Board comprises the Greater Brighton Economic Joint Committee (“GBEJC”), on which the local authorities will be represented; and the Greater Brighton Business Partnership (“GBBP”), on which the business, university and further education sectors will be represented
- 1.4. Meetings of the Board comprise concurrent meetings of GBEJC and GBBP.
- 1.5. GBEJC shall be a joint committee appointed by two or more local authorities represented on the Board, in accordance with section 102(1)(b) of the Local Government Act 1972.
- 1.6. The Board may appoint one or more sub-committees.
- 1.7. For the two years starting with the Commencement Date, the lead authority for the Board shall be Brighton & Hove City Council (“BHCC”), whose functions in that capacity shall include the provision of scrutiny (see paragraph 4.3), management of the call-in and review process (see paragraph 8), and the support detailed in paragraph 12.
- 1.8. Unless the Board resolves otherwise, before the start of the third year following the Commencement Date, and every two years thereafter, the Board shall review the lead authority arrangements and, subject to paragraph 1.9, invite each of the local authorities represented on the Board to submit an expression of interest in fulfilling the role of lead authority for the subsequent two year period. The Board shall then instigate a procurement exercise to select the most appropriate authority for that role.
- 1.9. Notwithstanding the appointment of a successor lead authority pursuant to paragraph 1.8, the incumbent lead authority may retain such of their Accountable Body functions as are necessary to enable that local authority to comply with its on-going commitments and liabilities associated with its Accountable Body status.

### **2. Interpretation**

- 2.1. In these Heads of Terms –
  - i. ‘Commencement Date’ means 1<sup>st</sup> April 2014.

- ii. 'City Region' means the area encompassing the administrative boundaries of BHCC, Adur District Council, Worthing Borough Council, Lewes District Council, Mid Sussex District Council, Crawley Borough Council and Arun District Council; and 'regional' shall be construed accordingly;
- iii. 'economic development' shall bear its natural meaning but with particular emphasis given to :
  - Employment and skills;
  - Infrastructure and transport
  - Housing;
  - Utilisation of property assets;
  - Strategic planning;
  - Economic growth.
- iv. 'Accountable Body' means the local authority represented on the Board carrying out the function set out in paragraph 12.2.

### **3. Functions**

3.1. The Functions of the Board are specified in paragraph 3.2 below and may be exercised only in respect of the Region.

3.2. The functions referred to in paragraph 3.1 are as follows:

- i. To make long term strategic decisions concerning regional economic development and growth;
- ii. To be the external voice to Government and investors regarding the management of devolved powers and funds for regional economic growth;
- iii. To work with national, sub-national, regional and local bodies to support a co-ordinated approach to economic growth across the region;
- iv. To secure funding and investment for the Region;
- v. To ensure delivery of, and provide strategic direction for, major projects and work stream enabled by City Deal funding and devolution of powers;
- vi. To enable those bodies to whom section 110 of the Localism Act 2011 applies to comply more effectively with their duty to co-operate in relation to planning of sustainable development.
- vii. To incur expenditure on matters relating to economic development where funds have been allocated directly to the Board for economic development purposes; and for the avoidance of doubt, no other expenditure shall be incurred unless due authority has been given by each body represented on the Board.

3.3. In discharging its function specified in paragraph 3.2 (Viii) above, the Board shall-

- i. (save in exceptional circumstances) seek to invest funding on the basis of-



- a Proportionality, by reference to the economically active demographic of each administrative area within the city Region;
  - b Deliverability;
  - c Value for money and return on investment / cost benefit ratio; and
  - d Economic impact to the City Region as a whole.
- ii. Delegate implementation of that function to the lead authority, who shall also act as Accountable Body in relation to any matters falling within that function.

#### **4. Reporting and Accountability**

- 4.1. The Board shall submit an annual report to each of the bodies represented on the Board.
- 4.2. The Greater Brighton Programme Board shall report to the Board and may refer matters to it for consideration and determination.
- 4.3. The work of the Board is subject to review by an ad hoc joint local authority scrutiny panel set up and managed by the lead authority.

#### **5. Membership**

- 5.1. The following bodies shall be members of the Board:

- i. Brighton & Hove City Council
- ii. Adur District Council
- iii. Worthing Borough Council
- iv. Lewes District Council
- v. Mid-Sussex District Council
- vi. Crawley Borough Council
- vii. Arun District Council
- viii. University of Sussex
- ix. University of Brighton
- x. Chichester College Group
- xi. Brighton & Hove Economic Partnership
- xii. Adur & Worthing Business Partnership
- xiii. South Downs National Park Authority
- xiv. NHS Sussex Integrated Care Board

- 5.2. GBEJC shall comprise the bodies specified in paragraphs 5.1(i) to (vii); and GBBP shall comprise the bodies specified in paragraphs 5.1(viii) to (xiv).
- 5.3. Each of the bodies listed in paragraph 5.1 shall be represented at the Board by one person.
- 5.4. Each local authority member shall be represented at the Board by its elected Leader.
- 5.5. Each business sector member shall be represented at the Board by the Chairman of that member or by a person nominated by the Board of that member.

5.6. Each university member shall be represented by a Vice Chancellor or Pro Vice-Chancellor of that university or by a person nominated by that university member.

5.7. Each further education member shall be represented by its Principal or the Chair of its Governing Body or by a person nominated by that further education member.

## **6. Chair**

6.1. The Chair of GBEJC shall, by virtue of his/her democratic mandate, be Chair of the Board

6.2. If the Chair of GBEJC is unable to attend a Board meeting, the Board shall elect a substitute from its local authority member representatives provided that no such member representative attending in the capacity of a substitute shall be appointed as Chair of GBEJC / the Board.

6.3. The Chair will be elected annually by members of the GBEJC. Election of the Chair will be conducted through a formal process performed by the Democratic Services Team of the Lead Authority. The elected Chair will be appointed at the first meeting of the Board in the new municipal year. A Chair may be re-elected but shall not serve as Chair for more than 4 years.

## **7. Voting**

7.1. Each person represents a member of GBEJC, and each person representing a member of the GBBP, shall be entitled to vote at their respective meetings.

7.2. Voting at each of the concurrent meetings of GBEJC and GBBP shall be by show of hands or, at the discretion of the chair, by any other means permitted by law, and voting outcomes reached at those meetings shall be on a simple majority of votes cast.

7.3. Where voting at a meeting of GBEJC results in an equal number of votes cast in favour and against, the Chair of GBEJC shall have a casting vote.

7.4. Where voting at a meeting of GBEJC results in an equal number of votes cast in favour and against, the motion/proposal/recommendation under consideration shall fall in relation of GBBP.

7.5. Where the respective voting outcomes of GBEJC and GBBC are the same, that shall be taken as the agreed Board decision and the Board may pass a resolution accordingly.

7.6. Where the respective voting outcomes of GBEJC and GBBP differ, the Board –

- i. May not pass a resolution relating to that matter; and
- ii. May refer the matter to the Chief Executive of the lead authority, who may consult with members of the Board or such other persons as are appropriate, with a view to achieving agreement on the matter between GBEJC and GBBP by discussion and negotiation.

7.7. Where, pursuant to paragraph 7.6(ii), agreement is reached the matter at issue shall be remitted to, and voted upon at, the next meeting of the Board.

7.8. Where, pursuant to paragraph 7.6(ii), no agreement is reached the motion/proposal/recommendation at issue shall fall.

## **8. Review of decision**

8.1. Decisions of the Board will be subject to call-in and review in the following circumstances:

- i. Where a local authority voted to agree a recommendation at a GBEJC meeting, but the decision of the Board was not to agree the recommendation.
- ii. Where a local authority voted against a recommendation at a GBEJC meeting, but the decision of the Board considered that the interests of the body they represent had been significantly prejudiced; or
- iii. Where any local authority represented on the Board considered that the interests of the body they represent had been significantly prejudiced; or
- iv. Where any local authority represented on the Board considered that the Board had made a decision beyond its scope of authority.

8.2. The procedure for requesting, validation, and implementing a call-in and review is specified in Schedule 1.

8.3. Where a request for call-in is accepted, the Board decision to which it relates shall be stayed pending the outcome of the call-in.

8.4. Following call-in, the panel convened to review a Board decision may refer the decision back to the Board for re-consideration. Following referral, the Board shall, either at its next scheduled meeting or at a special meeting called for the purpose, consider the panel's concerns over the original decision.

8.5. Having considered the panel's concerns, the Board may alter its original decision or re-affirm it. Paragraph 8.1 shall not apply to the Board's follow-up decision. In consequence, the latter decision may be implemented without further delay.

## **9. Substitution**

9.1. Subject to paragraph 9.2, representatives are expected to attend all meetings however, where a representative of a member of the Board is unable to attend a Board meeting, a substitute representative of that member may attend, speak and vote, in their place for that meeting.

9.2. A substitute member must be appointed from a list of approved substitutes submitted by the respective member to the Board at the start of each municipal year.

## **10. Quorum**

10.1. No business shall be transacted at any meeting of the Board unless at least one third of all member bodies are present, and both GBEJC and GPBBP are quorate.

10.2. Quorum for GBEJC meetings shall be three member bodies.

10.3. Quorum for GBBP meetings shall be three member bodies.

## **11. Time and Venue of Meetings**

11.1 Ordinary meetings of the Board shall be convened by the lead authority and will rotate around the City Region.

11.2 The Chair of the Board may call a special meeting of the Board at any time, subject to providing members with minimum notice of two working days.

## **12. Administrative, financial and legal support**

12.1 The lead authority shall provide the following support services to the Board:

- i. Administrative, as more particularly specified in the Memorandum of Understanding pursuant to paragraph 13;
- ii. Financial (including the Accountable body function specified in paragraph 12.2); and
- iii. Legal, comprising Monitoring Officer and Proper Officer functions in relation to GBEJC meetings.

12.2 The function of the Accountable Body is to take responsibility for the financial management and administration of external grants and funds provided to the Board, and of financial contributions by each member of the Board, as more particularly specified in the Memorandum of Understanding Pursuant to paragraph 13. In fulfilling its role as Accountable Body, the lead authority shall remain independent of the Board.

12.3 Other members of the Board shall contribute to the reasonable costs incurred by the lead authority in connection with the activities described in paragraphs 12.1 and 12.2, at such time and manner as the Memorandum of Understanding shall specify.

## **13 Memorandum of Understanding**

13.1 Members of the Board may enter into a memorandum of understanding setting out administrative and financial arrangements as between themselves relating to the functioning of the Board.

13.2 The memorandum may, in particular, provide for –

13.2.1 Arrangements as to the financial contributions by each member towards the work of the Board, including:

13.2.1.1 The process by which total financial contributions are calculated;

13.2.1.2 The process for determining the contribution to be paid by each member;

13.2.1.3 The dates on which contribution are payable;

13.2.1.4 How the Accountable Body shall administer and account for such contributions;

13.2.2 Functions of the Accountable Body; and

13.2.3 The terms of reference for the Greater Brighton Officer Programme Board.

## **14 Review and Variation of Heads of Terms**

14.1 The Board shall keep these Heads of Terms under review to ensure that the Board's purpose is given full effect.

14.2 These Heads of Terms may be varied only on a resolution of the Board to that effect, and subject to the approval of each body represented on the Board.





# Brighton & Hove City Council

## Cabinet

## Agenda Item 40

**Subject:** Brilliant Brighton Business Improvement District (BID) – New Ballot

**Date of meeting:** 25 September 2025

**Report of:** Cabinet Member for Finance and City Regeneration

**Contact Officer:** Name: Peter Sharp  
Email: peter.sharp@brighton-hove.gov.uk

**Ward(s) affected:** Regency, West Hill & North Laine

**Key Decision:** No

**For general release**

### 1. Purpose of the report and policy context

- 1.1 This report is to seek approval from Cabinet for the renewal (with a minor geographical amendment) of the existing city centre Business Improvement District (BID) in 2026, which strongly aligns with the city's Economic Plan and core outcomes 1 (a city to be proud of) and 2 (a fair and inclusive city) of the Council Plan 2023-27.
- 1.2 As set out in Paragraph 3.7, the BID is not run by the Council. The BID Regulations require the Council to support the BID as set out in Paragraph 3.17 to ensure successful delivery. This includes ballot administration and there are key steps that the Council must undertake (set out in Recommendations 2.1 – 2.3) in this regard.

### 2. Recommendations

- 2.1 That Cabinet agrees to support the renewal of the BID for the period 1 July 2026 to 30 June 2031 on the basis outlined in Paragraphs 3.16 and 3.17.
- 2.2 That Cabinet agrees to delegate authority to allow the Head of Cabinet Office to oversee the BID process and enter into the renewal of the BID Operating Agreement and any associated documents, following consultation with the Cabinet Member for Finance and Regeneration.
- 2.3 That Cabinet agrees to post a Notice of Ballot by 16 October pursuant to the Business Improvement District (England) Regulations 2004.

### 3. Context and background information

#### What is a BID?

- 3.1 A Business Improvement District (BID) is a defined geographical area which involves business rate-payers located within it, subject to specific categorisation. The Business Improvement District (BID) Regulations 2004

provide the framework for the establishment, management and operation of BIDs.

- 3.2 The majority of BIDs are focused on town and city centres (primarily retail), but the legislation allows any commercial area (including industrial estates) to establish a BID if a majority of businesses (i.e. more than 50% of eligible rate-payers by both total Rateable Value and number of hereditaments) vote in favour. According to the British BIDs Network, there are now an estimated 347 BIDs that represent around 133,000 businesses across the country.
- 3.3 BIDs last for a maximum term of 5 years and businesses within the defined area pay an additional levy - calculated as a proportion of the Rateable Value of their commercial premises - to fund improvements that can enhance their trading environment. The right to charge a levy arises under Section 41 of the Local Government Act 2003, which authorises a billing authority (such as the Council) to make BID arrangements for an area within its district.

#### Brilliant Brighton

- 3.4 The current city centre BID – ‘Brilliant Brighton’ – lasts from July 2021 until June 2026. It encompasses 517 retail and hospitality businesses on the ground floor of commercial premises within the area covering Western Road to the junction with Montpelier Road, Preston Street, North Street and parts of both The Lanes and the North Laine.
- 3.5 Brighton’s BID was formed to help create a thriving, safe, clean and vibrant city centre that residents and visitors want to come back to time and again. At the last ballot in 2021, the BID presented a business plan focused on core areas for investment including:
- Providing city centre Christmas lights displays
  - Dressing the city during spring / summer months (hanging baskets, banners, bunting and campaigns)
  - Providing on-street security / City Centre Ambassadors throughout the week
  - Marketing and events to promote city centre businesses.
- 3.6 The BID currently charges a BID levy<sup>1</sup> of 1.5% per annum, which generates around £390,000 per annum, and is well supported – at the last ballot in 2021, 82.5% of businesses by hereditament, that is, by individual property, voted in favour of renewal. The 2026-2031 BID will be the fifth iteration of a BID operated in Brighton city centre (the first ran from 2006-2011).
- 3.7 The BID is run by its Board of Directors who are comprised of ratepayers from within the BID area. It is not run by the Council.

#### Alignment with Council Plan

---

<sup>1</sup> There are a number of thresholds and caveats that protect the smallest businesses within the BID and help to maintain the city centre’s balance between independent businesses and multiple chain retailers.

- 3.8 The BID strongly aligns with the Council's Corporate Plan, primarily focused on Outcome 1 (a city to be proud of), as well as creating an inclusive and fairer city (Outcome 2). The table overleaf sets out key alignment.

<b>Outcome 1: A city to be proud of</b>	
<b>Investing in our city</b>	<b>Alignment with Business Improvement District</b>
Grow a diverse and sustainable city economy	<ul style="list-style-type: none"> <li>The BID supports small and medium-sized businesses, providing a programme of events and marketing that promotes the city as a destination, as well as operating a threshold below which small businesses are not liable for the BID levy.</li> <li>The BID works with the Council and other stakeholders to enhance the look and feel of the city centre.</li> </ul>
Promoting and protecting what makes Brighton & Hove unique	<ul style="list-style-type: none"> <li>The BID helps to build pride in the city centre, attracting visitors and enhancing the environment through hanging baskets, window displays, etc.</li> </ul>
<b>Outcome 2: A fair and inclusive city</b>	
<b>An inclusive and fairer city</b>	<b>Alignment with Business Improvement District</b>
A city where people feel safe and welcome	<ul style="list-style-type: none"> <li>The BID provides City Centre Ambassadors that support crime reporting and stock recovery for city centre businesses.</li> </ul>

#### Consultations on an Expanded BID Area

- 3.9 The BID and the Council jointly commissioned an options appraisal in Autumn 2024, that was carried out by [Locus Management Solutions](#). The purpose of this study was to jointly explore the viability of expanding the BID. Subsequently in January 2025, the Directors of the BID Board met and agreed to initiate the process of BID renewal and to explore the viability of expanding the BID.
- 3.10 Following the BID Board Meeting, consultations took place in June and July 2025 with all non-domestic ratepayers in the affected areas and included a focus on the geographical scope as well as options for expansion. These consultations considered on the following:
- Existing BID area
  - Inclusion of upper floor commercial premises within BID area
  - Sydney Street and Trafalgar Street
  - Queens Road
  - The remainder of the Lanes.
- 3.11 These consultations have been undertaken either in-person, via email or post, and where possible by multiple methods.
- 3.12 A result of these consultations is that businesses in the expansion areas cited have expressed doubts over joining the BID currently. This means that the prospects of success at ballot are slim. The impact of wider economic factors and low consumer confidence were cited as primary reasons behind this thinking.
- 3.13 Following discussion at the BID Board meeting in July 2025, it has been agreed to proceed on the basis of the existing geography less Preston Street (which also showed a low level of support). Areas not included at this

stage will be reviewed during the next 5-year BID term and the BID plans for continual business engagement during the next term.

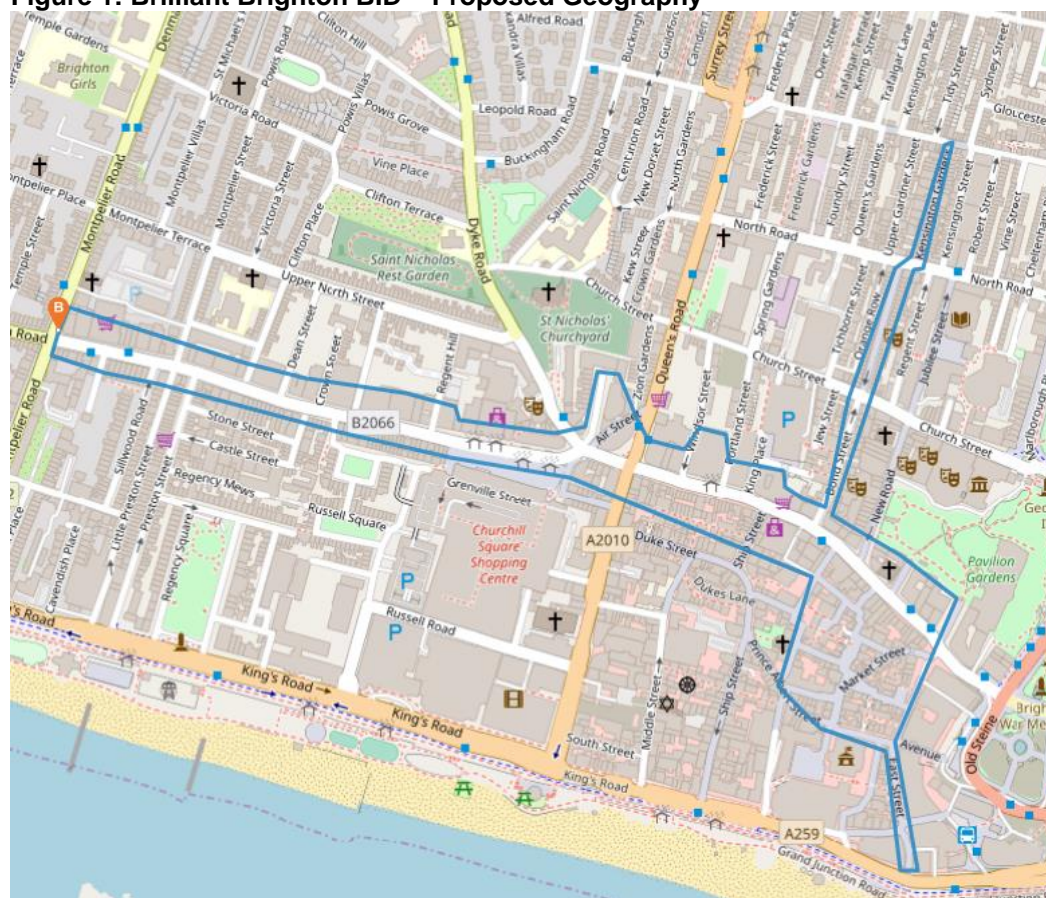
- 3.14 The results of consultation with impacted businesses within the BID has been used to create a business plan as required by Regulation 4 of the BID, which in turn will inform the BID Ballot.

#### BID Proposal and Ballot

- 3.15 BID arrangements cannot come into force unless the BID proposal is approved by a ballot of non-domestic ratepayers liable for the BID levy (Local Government Act 2003 c.26 s.49). To facilitate this, a Proposal will be drawn up (incorporating a business plan) and then put to ballot.
- 3.16 The geography for the BID renewal is shown below in Figure 1. The key aspects of the proposal are:
- That upper floor commercial premises are included
  - A higher BID levy (2%) is proposed
  - Levy rates are aligned to current rateable values (as at 31 March 2025) to minimise variation during the BID term.

This proposal will lead to an overall increase in BID income for reinvestment in the priorities for city centre businesses.

**Figure 1: Brilliant Brighton BID – Proposed Geography**



#### The Council's Role



3.17 The BID is run by Brighton BID Limited. Brighton BID Limited is a limited company (registered number 05686818) with its registered office at Brighton Police Station, John Street, Brighton, England, BN2 0LA. The company is run by its Board of Directors who are comprised of non-domestic ratepayers from within the BID area. The Council does not have formal representation on the Board. The Council's existing role in the current BID will continue in the renewed BID. The Council plays a supporting role to the BID through the following:

- **Ballot administration:** the Council's Returning Officer is the Ballot Holder and is legally responsible for the ballot process as set out within the BID Regulations. The Returning Officer has the option to deliver the Bid Ballot either in-house or outsourced.
- **Levy collection:** the Council is required to manage the collection and enforcement of the BID levy charge. BID entities and the local authority establish a levy collection agreement covering the term of the BID. The BID Regulations specify the process for approving BID proposals, conducting ballots, and other operational matters relevant to the Council's role. This role includes:
  - agreeing the principles and processes for collecting the levy;
  - enforcing levy payment; reporting on collection and bad debt;
  - monitoring provisions between the Council and the BID; and
  - provide regular detailed and summary information to the BID as the Council's client.

A fee will be payable from the BID to the Council for this service. Details will be set out in the BID Operating Agreement which will be drafted by BHCC's Legal team.

- **Baseline services:** It is a requirement under Schedule 1, paragraph 1(1) (b) to the BID Regulations that the BID proposals include a statement of the existing baseline services provided by the Council (or any other public authority) in the proposed BID area (if any). Services proposed to be funded by the BID would be set out and agreed as additional to this baseline offer. This is only required where there is a correlation between BID proposals and Council services, with the baseline taken as the service level at the start of the BID term in 2026. Once the BID Proposal has been finalised, the Baseline Services will be prepared in advance of the Ballot.
- **Support and facilitation:** The Council's Economic Development team works closely with the BID and other business networks in the city to support economic growth.

#### 4. Analysis and consideration of alternative options

4.1 Under the BID Regulations, the Council reserves the right to veto the BID proposals, albeit only in specific circumstances as shown:

- a. The Council concludes that the consultation carried out to produce the BID proposal and Business Plan has been inadequate (a breakdown of consultation undertaken will be provided in the final BID proposal documentation)

- b. The BID is a significantly disproportionate financial burden on any person or class of persons (as compared to the other non-domestic rate-payers in the BID area)
  - c. The BID proposal conflicts with any existing published or formally adopted Council policy.
- 4.2 The final BID business plan will be reviewed by the Economic Development team to ensure that the BID passes these tests.
- 4.3 If the Council chooses not to support the BID renewal, this is likely to have a detrimental impact on the city centre as c.£2.8m of investment over a 5-year period would be lost. This includes Christmas lights displays as well as security ambassadors and loss of marketing channels for some of the smaller independent businesses within the city centre.

## **5. Community engagement and consultation**

- 5.1 To ensure engagement and awareness with plans to renew the BID, the BID undertook consultations with affected businesses during June and July 2025. The consultation exercise has been designed to ascertain business perceptions of the BID, priorities for the next five years, improvements needed and the actions that will form the Business Plan from 2026 – 2031.
- 5.2 These consultations have aimed to engage with every person that pays the National Non-Domestic Rates bill for a hereditament within the proposed BID area. The BID was supported by research students from the University of Sussex alongside Locus Management Solutions.

## **6. Financial implications**

- 6.1 There are limited financial implications for the council related to the cost of running the ballot. This is estimated at £1,800 for printing and postage costs plus officer time. There is no allocated budget for this work and so this represents an in-year financial pressure.
- 6.2 The BID currently generates approximately £390,000 per year for investment in the priorities of city centre businesses. Should the ballot be successful, the new term of the BID is expected to generate c.£520,000 per year. The BID is producing a business plan (as set out in Paragraph 3.14) that will guide how this funding is invested.

Name of finance officer consulted: I. Chagonda Date consulted: 01/09/25

## **7. Legal implications**

- 7.1 The Council is required to comply with the process set out in the BID Regulations and the Local Government Act 2003, in relation to the renewal of (and any amendments to) the 'Brilliant Brighton' Business Improvement District.

- 7.2 The BID Regulations and the Local Government Act 2003 require non-domestic ratepayers to take part in a Ballot to determine whether the BID shall be renewed. The BID Regulations require a Proposal (including Business Plan) to be drawn up and then submitted by Ballot to non-residential ratepayers within the proposed Business Improvement District. Renewal of the Business Improvement District will proceed provided a majority of non-domestic ratepayers agree to the terms of the Proposal within the Ballot.
- 7.3 In accordance with the BID Regulations:
- the Ballot Holder for the Ballot is the Council's Returning Officer who is legally responsible for the Ballot Count; and
  - following renewal of the BID, the Council will be responsible for collecting and enforcing the BID levy from non-domestic ratepayers within the BID.
- 7.4 Provided that the Ballot is successful and the BID is renewed, an Operating Agreement will be drawn up by Legal Services to govern the role of the Council and that of the BID Company throughout the duration of the renewed BID.

Name of lawyer consulted: Jane Woods      Date consulted: 12/08/25

## **8. Risk implications**

- 8.1 As set out in paragraph 3.2, BIDs are voted on by the constituent ratepayers within a defined geographic area. The Council engages closely with the BID Board to maximise the benefit of additional investment in the city centre.
- 8.2 However, should the proposed ballot be unsuccessful, the BID will cease on 30 June 2026. This would directly impact upon council objectives, including SR40 (failure to maintain a clean and safe city). In particular the BID works closely with key council services (including City Operations and Economic Development) to provide the City Centre Ambassadors, events and promotions to enhance the city centre primary retail districts.
- 8.3 In terms of managing risk, the recommendations contained within this report are designed to ensure that the council's obligations in respect of the BID are fully met to facilitate the renewal process and the Council will comply with the BID Regulations in the carrying out of its role relating to the BID (as set out in paragraph 3.17).

## **9. Equalities implications**

- 9.1 A key principle in the Economic Plan is to promote inclusive growth in the city. An Equalities Impact and Outcome Assessment (EIA) was prepared for the Economic Plan identifying where work can be effectively focused to maximise benefits for diverse and vulnerable groups. BID renewal was a key action within the Economic Plan as it is a vital part of creating a leading destination that welcomes investment into Brighton & Hove.

- 9.2 The consultation process for BID renewal is led by the BID company and has actively considered how its design, governance, and delivery may impact individuals and groups with protected characteristics, and how it can contribute to a more inclusive and equitable city.
- 9.3 Brighton & Hove is a diverse and vibrant city, with a rich mix of communities, cultures, and business types. The BID renewal has sought to reflect this diversity by engaging all businesses within the proposed geography which encompasses a broad spectrum of stakeholders, including minority-owned businesses, community-led enterprises, and organisations representing underrepresented groups. Consultation activities were designed to be accessible and inclusive, with a variety of approaches adopted including online, via mail and in-person to ensure that voices from across the city were heard and considered.
- 9.4 The BID's strategic priorities aim to support economic growth and place-making in ways that are inclusive and equitable. Specific attention has been given to:
- Ensuring that levy structures and participation mechanisms do not disproportionately disadvantage small, independent, or community-focused businesses.
  - Promoting representation within BID governance structures to reflect the diversity of the local business and community landscape.
  - Embedding inclusive marketing and communications practices that reflect the cultural and demographic diversity of the city and its business community.
- 9.5 The BID will be expected to monitor its activities through an equality lens, including regular reviews of its impact on different groups and communities.

## **10. Sustainability implications**

- 10.1 Indirectly, the BID will support Council sustainability aspirations by providing a coordinated voice for 500+ businesses to engage with the Council. This includes through engaging with our leading Circular Economy programme as well as ensuring that net zero opportunities are promoted to all BID members.

## **11. Other Implications**

### **Crime & disorder implications:**

- 11.1 The BID's City Centre Ambassadors work closely with Sussex Police and the city's Business Crime Reduction Partnership to reduce crime and gather intelligence on criminal activity within the BID area. In 2024, the Ambassadors successfully recovered around £60,000 worth of stolen stock from the BID area.

## **12. Conclusion**

- 12.1 The Brilliant Brighton BID has made and continues to make a significant positive contribution to the look and feel of the city centre, driving activities and displays that attract visitors.
- 12.2 Continued support for the BID will help to deliver against the city's Economic Plan as well as the Council Plan. The BID is a valued partner to the council and is a key part in driving city centre investment and footfall.

### **Supporting Documentation**

#### **1. Background documents**

- 1. [Part 4 of the Local Government Act 2003 \(Business Improvement Districts\)](#)
- 2. [Business Improvement District \(England\) Regulations 2004](#)





# Brighton & Hove City Council

## Cabinet

## Agenda Item 41

**Subject:** Corporate Health, Safety and Wellbeing Policy

**Date of meeting:** 25<sup>th</sup> September 2025

**Report of:** Cabinet Member for Customer Services and Public Realm

**Contact Officer:** Name: Brent Schwarz  
Email: Brent.Schwarz@brighton-hove.gov.uk

**Ward(s) affected:** All

**For general release**

### **1. Purpose of the report and policy context**

- 1.1 The purpose of this report is to inform Cabinet of the outcome of engagement with senior officers, staff, trade unions and other stakeholders on developing a new Corporate Health, Safety and Wellbeing Policy.
- 1.2 To seek approval for the new refreshed Corporate Health, Safety and Wellbeing Policy within the Council.
- 1.3 This report is aligned to all four council plan outcomes and contributes to the councils five pillars of a learning organisation, forming the backbone of the delivery of the council's services to our community and statutory obligations to its staff.
- 1.4 This policy has been produced in accordance with the requirements of Section 2(3) of The Health and Safety at Work etc. Act and applies to the council in its entirety. The policy forms the foundation for compliance to the requirements set out with health and safety legislation. It ensures the council discharges the duties placed on the council by regulatory requirements. It also forms a reset to the health, safety and wellbeing culture across the council, from a regulatory enforcement response culture to a proactive safety culture.

### **2. Recommendations**

- 2.1 That Cabinet approves the new corporate health, safety and wellbeing policy.

### **3. Context and background information**

- 3.1 The Health and Safety at Work etc. Act places duties on employers, i.e. Brighton and Hove City Council to ensure, as far as is reasonably practicable, the health, safety, and welfare of their employees and members of the public affected by their work activities. The Management of Health and Safety at Work Regulations are UK laws that require employers to manage

health and safety risks in the workplace, key requirements include conducting comprehensive risk assessments, having a documented health and safety policy, appointing a competent person for health and safety matters, providing adequate training and information, and establishing emergency procedures.

- 3.2 The proposed new health, safety and wellbeing policy will pave the way for cultural change, provide clarity on roles and accountability and will embed a learning organisation approach. A renewed commitment from the Council Leader, Chief Executive Officer and Council Leadership team and establishes a clear model leadership for health, safety and wellbeing, from the top to front line staff.
- 3.3 The proposed health, safety and wellbeing policy has been created following the enforcing authority's Guidance HSG 65, implementing a plan, do, check and act model. It instils a true learning organisation culture, in line with our learning framework, and will continue to develop and grow with the council. It establishes an overarching framework which will be supported by subsequent health, safety and wellbeing policies known as arrangements that are subject specific.
- 3.4 The key features of the proposed policy are:
- Rationale: The Council requires a new health, safety and wellbeing policy to address historic challenges and cultures, ensure proactive regulatory compliance, and shift from a reactive to a proactive safety culture.
  - Governance and Learning Organisation Model: Establishes clear lines of accountability, clarity over roles, embeds our Learning Organisation framework, particularly being healthy and psychologically safe and introduces a governance framework that promotes learning through challenge, scrutiny, and ongoing improvement.
  - Contract Management Focus: Enhanced contract management focus, ensuring monitoring and performance are addressed early and robustly. This aims to prevent compliance failures and maintain statutory obligations.
  - Learning: directly responds to previous learning, promoting training, increased communications and awareness, clear roles, and improved oversight, helping to prevent repetition of past issues.
  - Risk based approach: designed to mitigate risks—including health and wellbeing, reputational damage, prosecution, and fines—by protecting staff, residents, and visitors and keeping them safe and well from potential health and safety risks and issues.

#### **4. Analysis and consideration of alternative options**

- 4.1 A reset of the council's health, safety and wellbeing policy and culture with associated governance is critical to the organisation and our duties to keep staff, stakeholders and communities safe, securing delivery of the council's 4 outcomes. This is considered an essential reset.

## **5. Community engagement and consultation**

- 5.1 Key stakeholders from the council have been involved with the development of the policy. These include:
- Corporate Health, Safety and Wellbeing department subject matter experts
  - Health and Safety Executive (HSE)
  - Key stakeholders from all council directorates directorate
  - Key stakeholders from central hub services
  - Key stakeholders from Trade Unions
  - Senior officers of the council
- 5.2 Feedback received during the engagement and consultation was significantly positive, suggesting the new policy and approach is welcomed amongst key stakeholders and assist address historical challenges.
- 5.3 Agreed at the People and Innovation Directorate Leadership Team meeting on the 16<sup>th</sup> July 2025.
- 5.4 Agreed at the Corporate Leadership Team on the 29<sup>th</sup> July 2025 subject to Cabinet approval.

## **6. Financial implications**

- 6.1 There are no direct implications associated with the recommendation in this report. Day-to-day costs associated with the Health & Safety policy are currently part of the council's established budget and monitored in line with the council's TBM process.
- 6.2 Individual business cases following any Health & Safety reports will be taken forward on their own merit and approved in line with the councils Financial Regulations and Financial Procedures.

Name of finance officer consulted: Craig Garoghan

Date consulted: 02-09-2025

## **7. Legal implications**

- 7.1 Health and safety is a critical part of employer responsibility. It must be treated with the greatest importance. Failure to deal with health and safety in an effective manner places the Council in a vulnerable position, including risk of prosecution. The reference to building is important as they represent a work place under the act and so are integral to the way of H&S should be viewed. Learning from errors is also of critical importance to ensure mistakes are not repeated. Also important is to note that not every eventuality can be specifically addressed and so a policy has to be robust enough to endure that unusual circumstances can be dealt with, within the framework.

Name of lawyer consulted: Simon Court  
Date consulted: 01-09-2025

## **8. Risk implications**

- 8.1 Critical Impact – Failure to ensure and secure the council wide learning from previous incidents such as New England House may result in fatal injuries, occupational diseases like asbestosis and legionellosis, prosecution, and imprisonment. Ongoing deterioration of our buildings may also affect the psychological impact of staff working in poor work environments, tenants from unsafe commercial premises and residents from unsatisfactory compliance and safe accommodation.
- 8.2 It may also result in prosecution and breaches of statutory requirements. The Council has a statutory duty for managing health and safety risks, securing compliance of which may potentially impact the council's reputation significantly should adverse events occur and/or if enforcement action is taken. The impact of the New England house is an example of this learning which will continue to impact the council's reputation for a prolonged period.

## **9. Equalities implications**

- 9.1 The Council has a statutory duty for managing health and safety risks regardless of their abilities or disabilities. The residual hazards and risks could impact on all who use our buildings including staff, visitors, service users, pupils and contractors. The new proposed policy supports an all inclusive framework enhancing the councils equality agenda while suitably and effectively managing health, safety and wellbeing through a risk based approach.

## **10. Sustainability implications**

- 10.1 The approval and implementation of the new policy will support promoting a health, safe and secure environment(s) for the council's staff and community to live and work in.

## **11. Other Implications**

### **Social Value and procurement implications**

- 11.1 There are no social value and procurement implications.

### **Crime & disorder implications:**

- 11.2 There are no crime and disorder implications

### **Public health implications:**

- 11.3 An effective Provision of Health, Safety and Wellbeing to Council staff and positive compliance to statutory requirements will mean that provision and impact on service delivery, custom and practices becomes transparent and



equitable. The risk of non-compliance and health, safety and wellbeing issues arising decrease for services that deliver to the community for proactive positive safety cultures.

## **12. Conclusion**

- 12.1 The new proposed policy reflects the council's strengthened health, safety and wellbeing agenda and includes recommendations and follows engagement with a broad range of stakeholders including our trade unions, workers forums, and senior officers to provide a more supportive policy for our workforce and properties.
- 12.2 It is aligned to the council plan and enables the four council outcomes to be achieved, embedding our five pillars of a learning organisation securing a Healthy and Psychologically safe council. It supports securing employee health, safety and wellbeing at work.

## **Supporting Documentation**

### **1. Appendices**

- 1. New Corporate Health, Safety and Wellbeing Policy



# Being healthy and psychologically safe

Health, safety and wellbeing policy  
2025 to 2028



Be healthy and  
psychologically safe



Brighton & Hove  
City Council

# Contents

<b>Document Information .....</b>	<b>3</b>
<b>Summary .....</b>	<b>4</b>
<b>Introduction .....</b>	<b>6</b>
<b>Aim .....</b>	<b>7</b>
<b>Scope .....</b>	<b>7</b>
<b>Organisation and Leadership.....</b>	<b>8</b>
<b>Leadership.....</b>	<b>8</b>
<b>Arrangements.....</b>	<b>10</b>
Health, safety, and wellbeing management system.....	10
Governance and Assurance.....	13
Health, safety and wellbeing board .....	14
Consultation.....	15
Assessment of risk.....	17
Monitoring Health, Safety and Wellbeing.....	17
Schools.....	19
Visitors.....	19
<b>Responsibilities.....</b>	<b>20</b>
<b>Council Leader and Cabinet Members.....</b>	<b>20</b>
<b>Chief Executive Officer .....</b>	<b>20</b>
<b>Director of People and Innovation.....</b>	<b>21</b>
<b>Corporate Directors and Directors.....</b>	<b>21</b>
<b>Heads of Service, Governors, Head Teachers, Managers and Supervisors.....</b>	<b>22</b>
<b>All Staff and Employees.....</b>	<b>23</b>
<b>Head of Health, Safety, Wellbeing and Building Services .....</b>	<b>24</b>
<b>Corporate health, safety and wellbeing .....</b>	<b>25</b>
<b>Contractors and service providers .....</b>	<b>26</b>
<b>Occupational health .....</b>	<b>27</b>
<b>Building services, premises, estates and housing .....</b>	<b>27</b>
<b>School Governors .....</b>	<b>28</b>
<b>Head Teachers.....</b>	<b>28</b>
<b>Training .....</b>	<b>29</b>
<b>Monitoring Compliance .....</b>	<b>29</b>
<b>Legislation .....</b>	<b>30</b>
<b>Associated documents .....</b>	<b>30</b>

# Document Information

Document Title
Corporate Health, Safety and Wellbeing Policy
Document author and department
Brent Schwarz (Head of Health, Safety, Wellbeing, Facilities and Building Services)
Approving Responsible Person / Body
Council Leadership Team / Chief Executive Officer / Leader of the Council
Date of approval
Council Leadership Team 29-07-2025   Cabinet TBC
Review date
3 yearly or earlier if required
Edition no.
12
ID Code
BHCC-CHSW-P-01
Date of effect
November 2025
Queries
<p>If you have any queries related to this document, contact our Corporate Health and Safety: email <a href="mailto:HealthAndSafety@brighton-hove.gov.uk">HealthAndSafety@brighton-hove.gov.uk</a>   This document (Arrangement) has been designed to be printed. If you need this document in an alternative format or an accessible format, please email <a href="mailto:HealthAndSafety@brighton-hove.gov.uk">HealthAndSafety@brighton-hove.gov.uk</a>. This has been written for council staff use and some hyperlinks may go to pages or documents on The Wave, our council intranet, which is not available to non-council staff. Schools' staff will need to refer to their own Health and Safety Policy and additional information on BEEM. The document has also been written to reduce the number of hyperlinks used. Corporate Health and Safety are aware that some associated documents are in an inaccessible format and cannot be used by some staff. Requests can be made for an accessible version if needed.</p>



# Summary

## What is this document about?

This Policy has been produced in accordance with the requirements of Section 2(3) of the Health and Safety at Work etc. Act and applies to the council in its entirety. It will be substantially reviewed every 3 years, and a minor review will be conducted annually to ensure continued compliance with statutory and/or regulatory requirements.

We will notify all staff about any amendments. This policy contains details of respective roles, responsibilities, and organisation for the management of health, safety and wellbeing throughout the council. It is supported by other more detailed arrangements, procedures, and guidance documents which you should read alongside this document.

The health, safety and wellbeing 'Statement of Commitment', signed by the Leader of the Council and Chief Executive Officer, sets out the council's commitment towards health, safety and wellbeing.

## Who is this document for?

This Policy is intended for all council staff, members, teachers, visitors, and contractors. It applies to all services, educational, research, commercial, residential, recreational, facilities and management activities considered to be wholly or partly under the council's control.

It covers all involved with those activities and accessing those facilities. It is important that all relevant parties understand their responsibilities and what they must do to meet them as laid out in this policy and supporting arrangements.

## How does the council check this policy is followed?

The Corporate Health, Safety and Wellbeing team monitor council activities to ensure:

- compliance with legislation
- best practice
- council policies, arrangements and procedures associated with the health, safety, and wellbeing of those outlined in the policy

Monitoring health and safety performance occurs in several ways. We actively monitor the design, development, implementation, and operation of management arrangements.

These tend to be preventative., for example:

- inspections of premises, plant, and equipment
- health surveillance to prevent harm
- auditing to ensure arrangements are implemented effectively

We respond to evidence of poor health and safety practice and identify better practices that may be transferred to other parts of the council. For example, investigating accidents and incidents, and monitoring cases of ill health and sickness absence records.

We also monitor results from inspections of council buildings and property compliance, as well as feedback from staff, teachers, visitors, members, governors and the community. We use outcomes from audits, risk assessments, accident and incident data, fault reporting, and feedback from staff and others to ensure we continually improve.

## Contact

If you have any questions, contact [HealthAndSafety@brighton-hove.gov.uk](mailto:HealthAndSafety@brighton-hove.gov.uk)

# Introduction

Our vision is for Brighton & Hove to be a city to be proud of, a healthy, fair, and inclusive city where everyone thrives. This policy:

- supports the delivery of a well-run and responsive council
- ensures a safe, inclusive, accessible working environment that, supports staff health and wellbeing,
- supports the development of a strong and positive health and safety culture.

Our ways of working and leadership framework will support this policy's delivery and provide a structure for ensuring all staff and managers are clear on their responsibilities.



The arrangements we've developed to support this policy reflect the requirements set out in regulations and other statutory provisions. These are key to the development of management systems and the controls required to manage risks in the context of health, safety, and wellbeing. They are developed to ensure the council meets its statutory responsibilities and duties. The council community must read, acknowledge, and implement these corporate arrangements as applicable to their roles and areas of responsibility.

Managers should assess the specific needs of their staff and services and make additional arrangements or adjustments where needed. For example, when managers give information, instruction and training on the use of work equipment and the safety precautions detailed in the risk assessments, they must consider staff:

- with vision or hearing impairments
- with reading or learning difficulties
- whose first language is not English

Manages should complete individual risk assessments for staff with any specific medical conditions or circumstances which may affect their ability to use work equipment safely. They must also be completed if staff experience adverse health effects as a result of using certain equipment.

# Aim

The council is committed to ensuring the health, safety and welfare of all staff, members, teachers, contractors, and others. In principle, we aim to reduce the risk to the council community and to successfully achieve our strategic objectives.

We will work to allow the above groups to carry out their activities without detriment to their health, safety or wellbeing. We will do this while embedding health and safety in all we do. To achieve our aims the council will ensure that, in the context of this policy:

- roles, responsibilities, and accountabilities for council staff at all levels are clearly defined and understood to secure corporate and individual compliance with relevant legislation as determined in our legal register
- a positive health, safety, and wellbeing culture and a health and safety management system is in place
- all significant risks that may arise through the council's activities are identified and assessed – we will implement suitable and sufficient measures to eliminate, minimise or manage the risks to employees, members, teachers, and others
- implementation of systems of work, plant and equipment are safe and without risks to health, including arrangements for the use, handling, storage and transport of substances and articles.
- information, instruction, training, and supervision is provided as necessary to ensure everyone knows how to work safely and without risk to their health.
- measures to prevent and manage risks to staff wellbeing are put in place, including monitoring workloads, hours worked, appropriate training and support, and a psychologically safe and healthy culture
- as far as is reasonably practicable, we create a safe working environment without risks to support health, safety, and wellbeing, together with adequate arrangements for welfare at work including access and egress
- we provide adequate resources to manage and implement health, safety, and wellbeing effectively
- we monitor and review the suitability and effectiveness of our health, safety, and wellbeing arrangements to ensure they are adequate.

# Scope

These arrangements will protect staff and others against risks to their health and safety arising from council activities. This applies to:

- Chief Executive Office, Corporate Directors, Directors, Heads of Service, Senior Managers, Governors and Head Teachers who have responsibilities Health, Safety and Wellbeing Policy set out in this policy (including those individuals who would otherwise be classed as staff such as volunteers, employed students, apprentices, work experience, etc.).
- all managers
- all council staff

- all contractors and service providers working on behalf of or in connection with the council

This policy applies across all locations and activities operated by the council. It is supported and underpinned by additional health, safety, and wellbeing policies and arrangements and guidance where necessary. These form part of our health and safety management system.

## Organisation and Leadership

The council recognises and accepts its responsibility for complying with Health, safety and wellbeing legislation and for ensuring the health, safety and welfare of its employees and others who may be affected by council business. By implementing this policy and through the provision of associated information, instruction and training, the council seeks to manage the risks associated with health, safety, and wellbeing.

In addition to the roles and responsibilities outlined within this policy, detailed roles and responsibilities are further defined within specific subject matter. We regularly communicate health, safety, and wellbeing arrangements and guidance to staff and others through the corporate Health, Safety and Wellbeing team.

The health, safety and wellbeing Statement of Commitment and Policy is approved by the council's Leadership Team and Corporate Health, safety and wellbeing Board. Is endorsed by the Chief Executive Officer and Leader of the Council and is brought to the attention of all staff and Cabinet members. It is expected that:

- the commitment and policy are led, delivered, and managed in accordance with the current council Leadership Behaviours
- the outlined requirements form part of our organisation's ways of working, our values and behaviours, and our people strategy for all staff to follow

Health, safety and wellbeing forms the foundation in enhancing our staff and community experience, protecting people and places in connection with the council. To achieve this, we follow the strategic framework as set out by the Health and Safety Executive and latest government guidance for best practice for managing health and safety within Local Authorities.

Best practice is based upon the Health and Safety Executive's 'Plan, Do, Check, Act' management standards. In complying with the guidance, we are well placed to ensure compliance with best practice and legal requirements. The following responsibilities outline the organisation and arrangements for managing health, safety, and wellbeing.

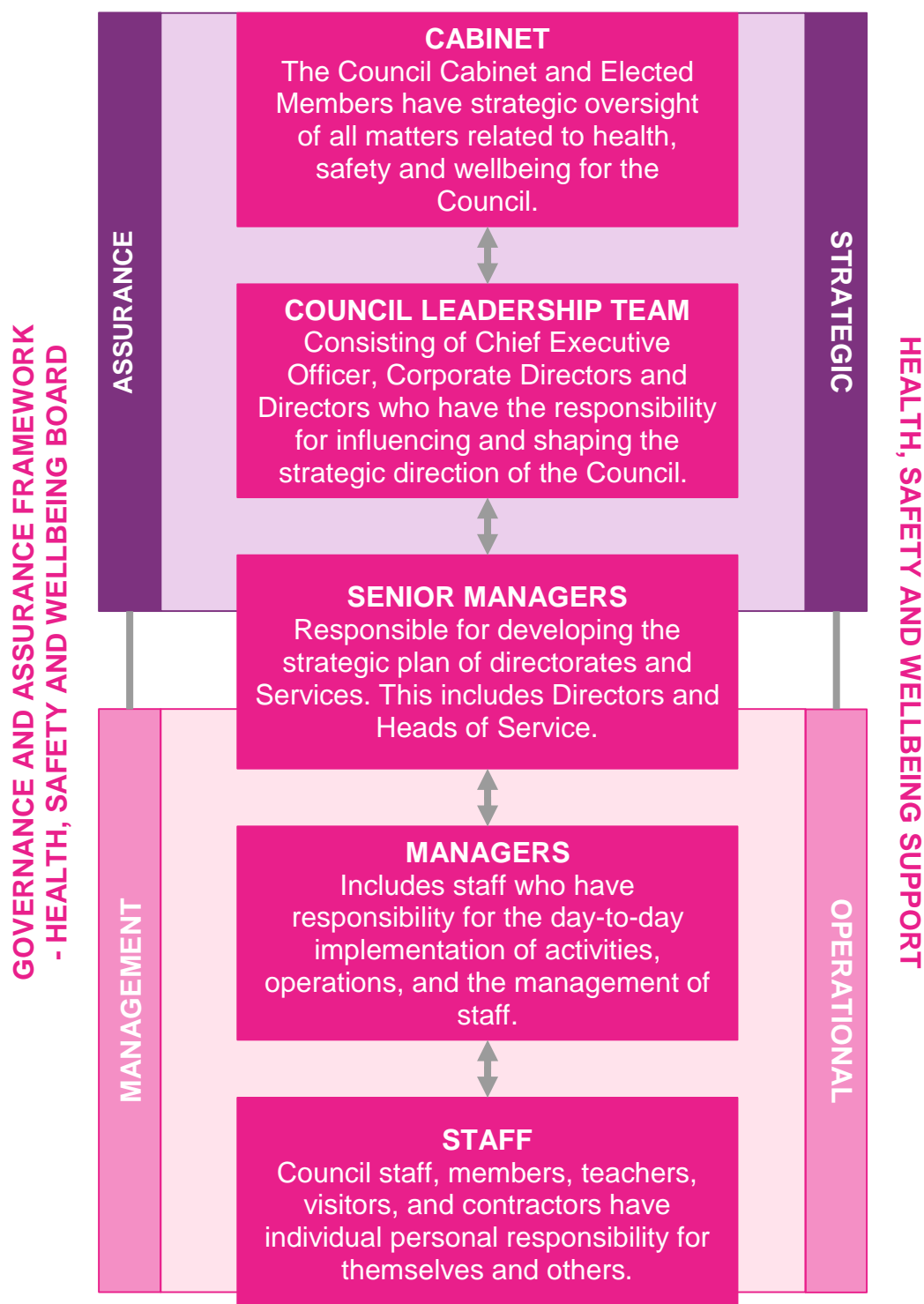
## Leadership

Our Cabinet and elected members have strategic oversight of all matters related to health, safety, and wellbeing for the council. A well-managed safe, healthy, and secure workforce is a prerequisite to the delivery of excellent services to local



communities. Our elected members have a significant input in securing the health and safety of the council's workforce.

Elected members provide the council with leadership, direction, strategy, and influence budgets. Their policy decisions can affect how health, safety, and wellbeing is managed. They have both individual and collective governance responsibilities. An elected member will be given lead responsibility for health, safety, and wellbeing and all elected members are briefed on this policy and their responsibilities. A summary of our health, safety, and wellbeing governance framework, in line with best practice for managing Health, safety and wellbeing, is shown below.



# Arrangements

The way we implement this policy is detailed in:

- Health, Safety and Wellbeing Policy subject matter arrangements
- policies
- procedures
- guidelines

Other specific Health, safety and wellbeing arrangements detail what we are required to do to meet our legal obligations and carry out our work safely. It is important that managers and employees follow these mandatory, council-wide policies and arrangements,

## Health, safety, and wellbeing management system

Our principal health, safety and wellbeing aims are to reduce risk and protect people and property and to achieve best practice in complying with our statutory duties. The nature of the council and our activities mean that these risks are complex, and it also means that its statutory duties are extensive. For these reasons the detailed arrangements for health, safety, and wellbeing are set out in a series of documented specific subjects. These are referred to as arrangements.

The specific arrangements are, in effect, council policies. They are mandatory and apply across the whole council and schools. These arrangements ensure the council meets its statutory duties under specific regulations.

The health, safety, and wellbeing management system has been developed to be easily explored on Health, safety and wellbeing The Wave (Or BEEM for schools), our council intranet. As with all quality-standard based systems, each policy and arrangement will be continually reviewed to identify improvements and gaps in information provision and compliance. This formal management system will help staff manage health, safety, and wellbeing within their remits.

The council has based its management system on the Health and Safety Executive Guide for Managing Health and Safety, HSG65, following the Plan, Do, Check and Act model. This achieves a balance between the systems and behavioural aspects of management. It also treats health, safety, and wellbeing management as an integral part of good management generally, rather than as a standalone system.

### POLICY AND PLANNING

We will review where we are and where we need to be and what we want to achieve, who will be responsible for what and how we will achieve our aims, and how we will measure success. We will look for leading indicators as well as lagging indicators. These are also called active and reactive indicators. Our plans will consider fire and other emergencies, and we will co-operate with anyone who shares our workplace and co-ordinate plans with them.

### RISK PROFILING, ORGANISATION, AND IMPLEMENTATION

We will assess our risks, identify what could cause harm, who it could harm and how, and what we need to do to manage the risk. We will involve our staff and communicate, so that everyone is clear on what is needed and can discuss issues – develop positive attitudes and behaviours. We will provide adequate resources, including competent advice where needed. We will implement preventive and protective measures, the right tools and equipment to do the job.

PLAN

ACT

DO

CHECK

### REVIEW / LESSONS LEARNT

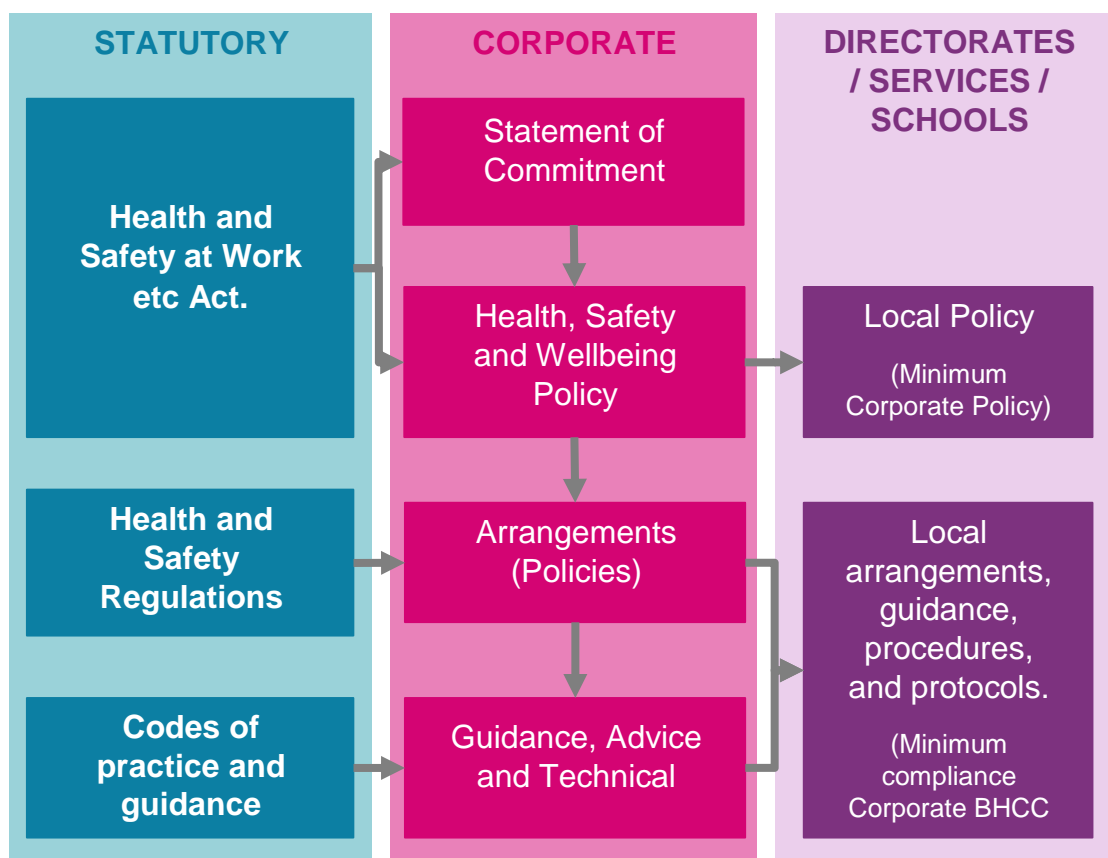
We will learn from accidents and incidents, ill-health data, errors, and relevant experience, from ourselves and from other organisations. We will revisit our plans, policies, arrangements, and risk assessments. We will act on lessons learned including audits and inspections.

### PERFORMANCE & COMPLIANCE MONITORING AND MEASURING

We will ensure our plan has been implemented and assess how well the risks are being controlled and if we are achieving our aims. This will include Proactive and Reactive Monitoring methods.

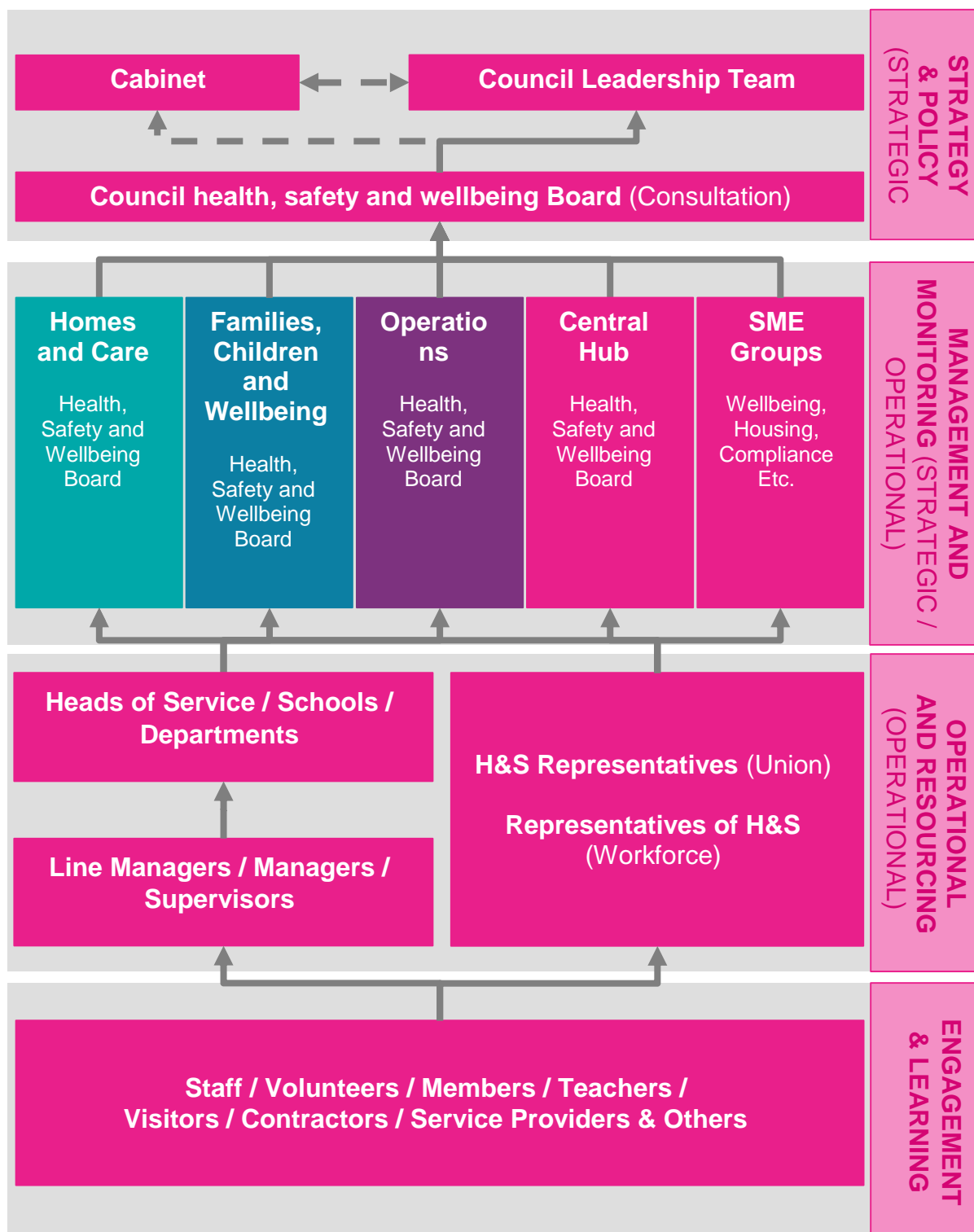
A series of policies, known as “arrangements”, form the system – these are the health, safety, and wellbeing management system building blocks and formally set out the council’s expectations in relation to health, safety, and wellbeing management practice to ensure we meets our legal duties. Each arrangement will comprise of:

- scope – extent and range for which the arrangement applies
- roles and responsibilities aligned to each specific arrangement to achieve statutory compliance and best practice - these include individual roles, departments, schools, and specific groups who have specific responsibilities within the topic
- arrangements – the way in which the council arranges its activities and operations in respect of the subject which are mandatory
- training –sometimes role holders need further training or instruction to fulfil their responsibilities in line with subject arrangements, in many cases with a statutory requirement
- monitoring – how the implementation of the arrangement and its requirements will be monitored
- legislation – all associated legislation applicable to the specific arrangement
- associated documents – these could include detailed guidance, forms, templates, protocols, technical guides, and technical notes, and will provide role holders with an understanding of the actions they need to take to fulfil their responsibilities



## Governance and Assurance

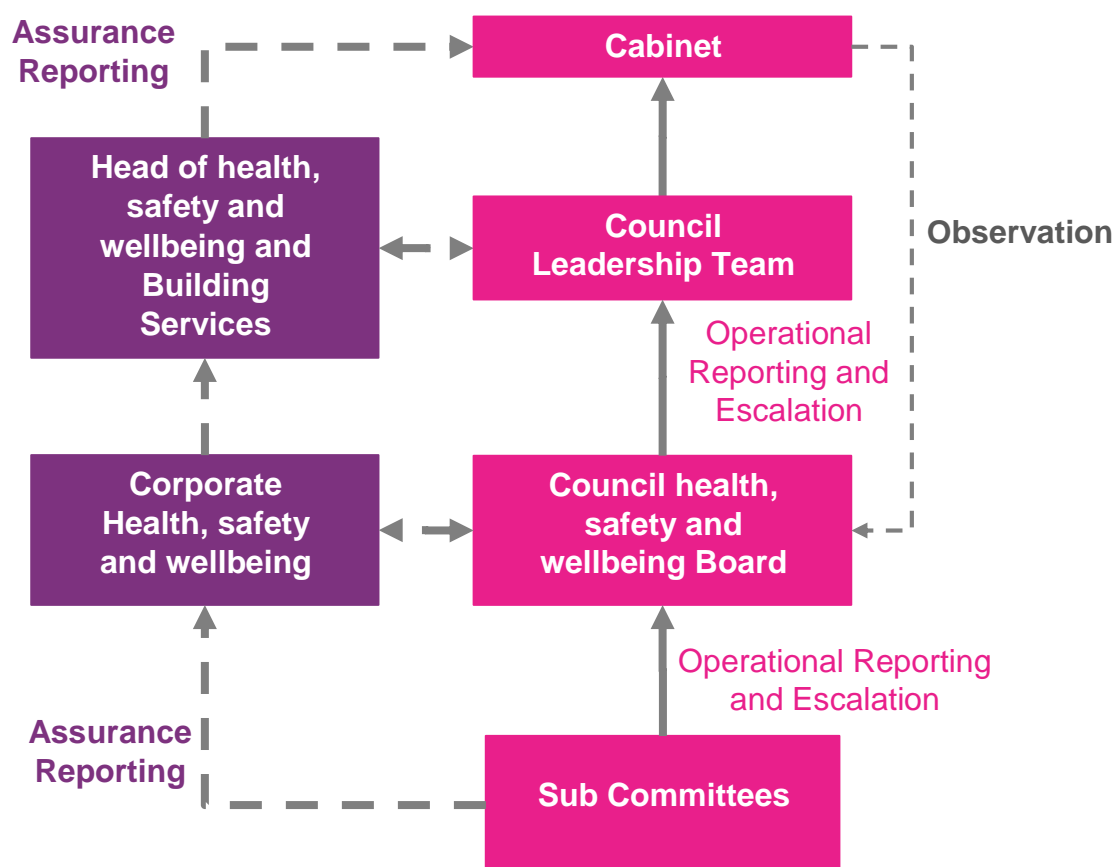
The Council Leadership Team has strategic oversight of all matters related to health, safety, and wellbeing and seeks assurance and reassurance that effective arrangements are in place. The flow chart below provides framework for health, safety, and wellbeing governance and assurance and details our arrangements. This assures the Council Leadership Team and Members that the council is meeting its health, safety, and wellbeing responsibilities and their own individual responsibilities.





A Cabinet Member will be appointed by the Leader of the Council to champion health, safety, and wellbeing and take lead on all health, safety, and wellbeing matters. The Cabinet and Council Leadership Team have ultimate responsibility for ensuring the council complies with its health and safety legal obligations and duties. The mechanism for obtaining compliance assurance is established through the governance and assurance framework. This is in addition to the framework and ensures the council secures a robust assurance reporting system, and that the Competent Person has a dotted reporting line to the Chief Executive Officer and the Leader of the Council.

The Council Member has observer status on the Corporate Health, safety and wellbeing Board. The Board meets regularly and will be provided with all papers and resulting minutes/briefings and given an opportunity to comment. The Member Champion, Leader of the Council and the Chief Executive Officer will meet periodically with the Competent Person (as defined in the Management of Health and Safety at Work etc. Regulations (Regulation 7)) and any staff member to discuss aspects of health, safety, and wellbeing. This will take place within the context of the governance and assurance framework.



## Health, safety and wellbeing board

The Corporate Health, safety and wellbeing Board is chaired by the Director of People and Innovation with the oversight from the Chief Executive Officer who has the overall responsibility for monitoring, advising, and ensuring compliance with the

Council's Health, safety and wellbeing policies and arrangements. The Board will review the management of health and safety within the Council, make decisions in terms of health, safety, and wellbeing and provide direction and support where required. The purpose of the Board is to.

- monitor its arrangements and practices to ensure compliance with this policy
- develop and implement corporate plans to drive improvements in health, safety, and wellbeing performance and practice, considering statutory requirements
- commission reviews into health, safety, and wellbeing and advise the Council Leadership Team of any outcomes and actions the board need to consider
- report relevant information, outcomes, and assurance to the Council Leadership Team

## Consultation

The council recognises trade unions and its responsibility to consult with both union and non-union staff. It operates a system for consultation where Trade Union and Management discuss issues which include health, safety, and wellbeing.

The principal consultation group for items which relate to health, safety and wellbeing is the Corporate Health, safety and wellbeing board.

The Board must have representation from Directorates and include both union representatives and non-union representatives. The Corporate Board will be held at least quarterly. Each Directorate will have a Directorate Health, safety and wellbeing Board which reports into the Corporate Health, safety and wellbeing Board. These are subcommittees of the Board and must include:

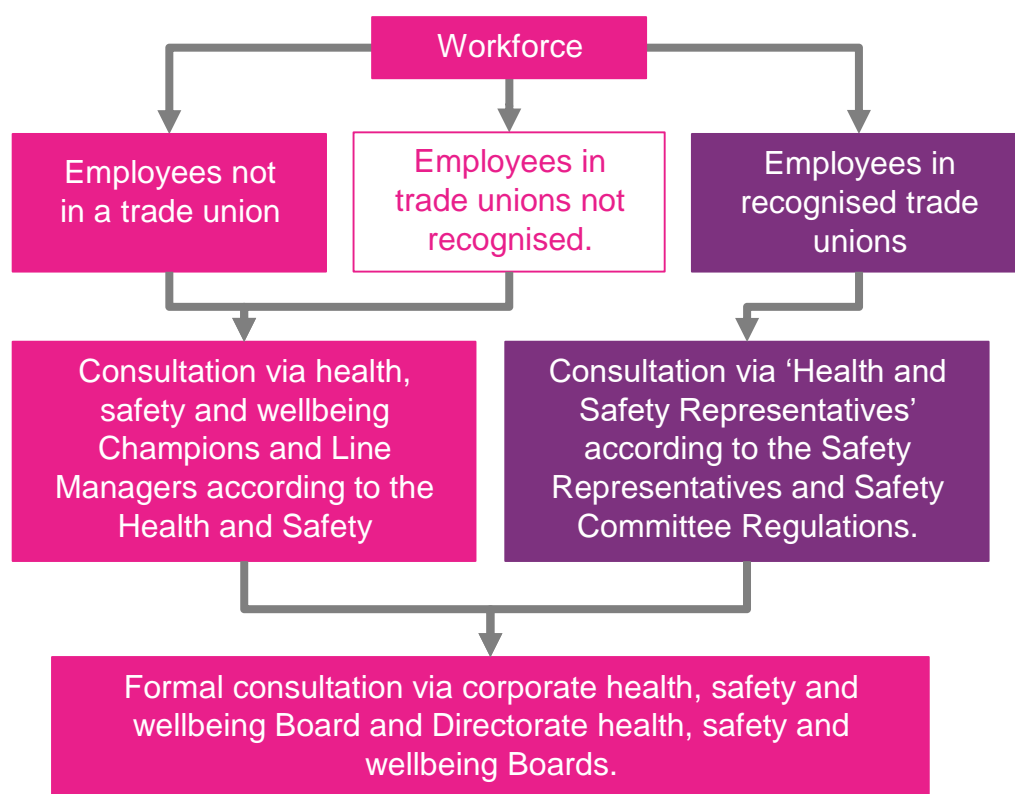
- management
- trade union safety representatives
- workplace health and safety representatives
- specialist advisors
- schools

The following protocols ensure the Board is meaningful and support a positive health, safety, and wellbeing culture:

- monitor the compliance of health, safety, and wellbeing, its arrangements and protocols
- lead the development and implementation of corporate plans to drive improvements in health, safety, and wellbeing performance and practice, considering statutory requirements and the council's Health, Safety and Wellbeing Policy
- advise the Council Leadership Team of any outcomes and actions the board need to consider
- the board reports relevant information, outcomes, and assurance to the Council Leadership Team
- effectively and proactively seek health, safety, and wellbeing assurance from Directorate Health, safety and wellbeing Boards

The following protocols ensure Directorate Health, safety and wellbeing Boards are meaningful and support a positive Health, safety and wellbeing culture:

- each service level health, safety, wellbeing group or meeting must feed into the next level up to the directorate level to ensure appropriate assurances are provided - assurances must equally be provided to corporate Health, safety and wellbeing Board
- Directorate Health, safety and wellbeing Boards must be held at least quarterly
- for an issue to be raised at a Directorate Health, safety and wellbeing Board, the person raising the issue must first be able to demonstrate clearly what the issue is, who they have consulted and what outcome they are seeking
- escalate any health, safety, and wellbeing concerns and issues which are of significant risk to the council, to the Corporate Health, safety and wellbeing Board that cannot be dealt with at Directorate level for their consideration
- ensure any Health, safety and wellbeing concerns and issues, which are of significant risk to the council and that cannot be dealt with at Directorate level are submitted to the Directorate Health, safety and wellbeing Board for their consideration
- effectively and proactively seek health, safety, and wellbeing assurance from services



The council recognizes the statutory requirement for consultation and the benefits and values of union-appointed Health and Safety Representatives'. To comply with the Safety Representatives and Safety Committee Regulations, consultation with 'Health and Safety Representatives' (as appointed by the union(s) and those who are not trade union members), is essential to fulfil our obligations and securing a safe, healthy, and secure workplace.

All Directorates, Services and Schools must equally have their own local arrangements for consultation with staff. The council supports and encourages appropriate consultation with staff. Our arrangements include both the Safety Representatives and Safety Committees Regulations and the Health and Safety (Consultation with Employees) Regulations.

## Assessment of risk

The aim of the council is to provide high quality, effective and safe services to the Brighton & Hove community, both outward facing and internal facing (staff). We also strive to provide a working environment which improves the community and population it serves.

Members and Council Leadership Team recognise risk is inherent in the council's provisions and services, and that a defined approach is necessary to identify risk context, ensuring we understand and is aware of risk profile, the council's risk appetite, and risk tolerances we are prepared to accept in the pursuit of the delivery of our aims and objectives.

The Council Leadership Team is primarily responsible for overseeing the risk tolerances and appetite, development process and in monitoring the council to determine whether any changes should be made. The Corporate Health, safety and wellbeing Board can monitor risk by having a robust risk monitoring process and escalation framework. This is where Directorate and Specialist Health, safety and wellbeing Boards and groups report to the board when risk tolerance levels have been exceeded. Similarly, Services and Heads actively monitor and escalate risks to Directorate and Specialist Health, safety and wellbeing Boards and groups. The board will determine whether the council:

- a risk assessment process and the risks identified are line with the council's strategy
- the risk profile and assessment are being updated frequently
- the capacity to deal with the risks identified and the risks likely to impact future strategic initiatives
- communicated changes throughout the council and to key stakeholders.

Assessing risk is vital to the effective management of health, safety, and wellbeing within the council, as laid out in the Management of Health and Safety at Work Regulations. The Regulations require a 'suitable and sufficient' assessment of identified risks to health and safety to ensure suitable controls are in place using the principles of prevention.

The council will establish a risk profile as outlined within the Health and Safety Executive's guidance document HSG 65 and agree specific health and safety objectives informing the strategic plans. The Corporate Health, safety and wellbeing Board will agree objectives and keep them under review during the effective period.

## Monitoring Health, Safety and Wellbeing

Senior Managers and Managers, including Governors and Headteachers, must monitor health, safety, and wellbeing performance against:

- legislation
- this Health, safety and wellbeing policy
- our arrangements, protocols and local procedures.

The monitoring must be discussed and where necessary included as part of the agenda on management / team meetings. In principle monitoring can be either active or reactive and may include:

- risk registers and risk assessment reviews and compliance monitoring
- self-audits and inspections
- work supervision and behaviour monitoring
- action plans
- competency standards, training and awareness
- performance
- equipment maintenance, inspection, and testing
- statutory compliance checks
- contractor/service provider monitoring and vetting
- accidents and incidents recording and analysis
- investigations, reviews and lessons learned

Regular formal (documented) and informal health and safety inspections of the workplace must be undertaken and, where necessary, in consultation with Trade Union Safety representatives. Suggested frequency should also be determined through risk assessment. Action plans must be developed to deal with any health and safety issues identified. The results of the inspection and action plan must be discussed in management / team meetings. Where work areas are shared, managers must discuss and agree responsibility for carrying out workplace inspections and ensuring actions are completed as required.

The monitoring and review of health and safety arrangements and compliance with the council's arrangements is an everyday responsibility of all staff. However, managers and supervisors hold a higher duty of responsibility to monitor and ensure compliance. Heads of School and Services or equivalent should implement suitable and sufficient auditing or self-verification assessment. The frequency and detail of such activities must be appropriate for the size of the Directorate, Service or School, level of risk, and nature of the hazards within each. Audit types to measure compliance with the policy and arrangements include:

- health and safety management audits: reviewing the arrangements and procedures in place within schools and services.
- subject specific audits, concentrating on a specific subject or topic areas within schools and services – for example chemical safety, radiation protection, laser safety, working at height, and so on

All audits and self-verification reports must be shared and monitored by management team meetings, services, schools, Directorate Health, safety and wellbeing Boards and, where necessary, Corporate Health, safety and wellbeing



Board to determine progress in areas for improvement that may be identified as necessary for compliance.

Corporate Health, safety and wellbeing may undertake corporate led auditing and inspections as part of the assurance framework to ensure suitable compliance. Depending on the level of audit, (desktop or remote audit, hybrid audit or full onsite audit), directorates, services and schools will be notified in advance if they are subject to corporate auditing.

Where shortfalls have been identified an action plan will be produced to ensure corrective actions are taken. These will be monitored and reported on through the assurance framework. The corporate Health, Safety and Wellbeing team retain the right under principles of health and safety management as endorsed by Council Leadership Team, to carry out auditing and inspection as necessary/according to programme, of any directorate, service, or school.

## Schools

Under the terms of the policy, each school must ensure it has in place a Health, Safety and Wellbeing Policy. This must specifically detail its own organisational structure, responsibilities and arrangements and should reflect the arrangements of the school.

## Visitors

The council often hosts visitors and recognises its duty to them as required by Section 4 of the Health and Safety at Work etc. Act, which applies to the council in its entirety.

The council will ensure that suitable arrangements are in place and provide relevant and accessible health, safety, and wellbeing information to visitors. While it is recognised the council has a duty to protect the health and safety of all visitors to its premises, including contractors and temporary workers, as well as any members of the public who might be affected by its activities and operations, it will ensure as far as reasonably practicable within its powers to ensure the Health and Safety of visitors.

The council also recognises that health and safety is the responsibility of every individual and visitors must take reasonable care of their own health and safety and that of others who may be affected by their acts or omissions.

# Responsibilities

## Council Leader and Cabinet Members

The Council Leader and Cabinet Members are responsible for ensuring they are familiar with their responsibilities with regards to Health, safety and wellbeing and provide the council with leadership, direction, strategy, and influence finances. Their policy decisions can affect how health, safety, and wellbeing is managed, and they have both individual and collective governance responsibilities.

All elected members can be held liable under the Health and Safety at Work etc Act for their actions or decisions. An Elected Member will be given responsibility for Health, safety and wellbeing and elected members must ensure:

- 1.1. Decisions they make take into account this Council's Health, Safety and Wellbeing Policy and any applicable statutory provisions.
- 1.2. A cabinet member is appointed who has specific responsibility for monitoring the operation of the council's Health, Safety and Wellbeing Policy.
- 1.3. Adequate resources are made available for implementing this policy and appropriate competent assistance under the Management of Health and Safety at Work Regulations is in place.
- 1.4. A positive health, safety, and wellbeing culture is promoted and supported proportionate to the Council's risk management.
- 1.5. The Chief Executive Officer and the Council Leadership Team, follow their responsibilities detailed within Health, safety and wellbeing this policy, its arrangements and protocols, holding them to account if they do not.

## Chief Executive Officer

The Chief Executive Officer is ultimately responsible for the management of health, safety, and wellbeing across the council. In summary they must ensure that:

- 1.6. A 'competent person(s)', as required by The Management of Health and Safety at Work Regulations (Regulation 7) is formally appointed to assist them in discharging their duties and complying with Health, safety and wellbeing legislation.
- 1.7. Adequate resources, an appropriate organisational structure, and suitable arrangements are in place to implement this policy and subsequent arrangements regarding Health, safety and wellbeing management.
- 1.8. Strong, active leadership and commitment to continuous improvement in Health, safety and wellbeing performance is demonstrated.
- 1.9. The Council Leadership Team consider Health, safety and wellbeing as an integral part of the council's management plans and strategies.
- 1.10. That employees at all levels are sufficiently supervised, trained, and competent with regards to their Health, safety and wellbeing responsibilities and information is provided to them.
- 1.11. There are systems in place to manage the organisation's risks and that suitable and sufficient control measures are established and maintained.

- 1.12. They chair the Corporate Health, safety and wellbeing Board, a strategic subcommittee of Council Leadership Team specifically for health, safety, and wellbeing, ensuring:
- its continued effectiveness through the monitoring of actions and outcomes
  - necessary assurances and escalation items are brought to the attention of the Council Leadership Team and Cabinet
- 1.13. There are effective arrangements for consultation with employees, their representatives, and recognised Trade Union representatives.
- 1.14. Ensure elected Members are informed when making decisions.

## Director of People and Innovation

The Director of People and Innovation has been appointed by the Chief Executive Officer, for health, safety, and wellbeing across the council and in summary must ensure that:

- 1.15. Appropriate leadership is in place for and on behalf of the council regarding health, safety, and wellbeing matters for the council.
- 1.16. The operation of the health, safety, and wellbeing management system provides effective planning, organisation, control, monitoring and review of health, safety, and wellbeing within the council.
- 1.17. They Chair the Combined Support Services Health, safety and wellbeing subcommittee involving both management and staff representatives to monitor the effectiveness of health, safety, and wellbeing arrangements.
- 1.18. They are kept informed about any significant health, safety, and wellbeing failures, and of the outcome of any investigations into their causes through the council's reporting protocols.
- 1.19. Escalation and communication in the council as appropriate

## Corporate Directors and Directors

Each individual Corporate Director and Director is responsible for ensuring:

- they are familiar with and adhere to this policy and council arrangements
- they are implemented effectively within their areas of responsibility in addition to their line management responsibilities.

In summary they must ensure that:

- 1.20. Proactive Leadership on health, safety, and wellbeing matters for their areas is effective and suitable.
- 1.21. The operations of the health, safety, and wellbeing management system provides effective planning, organisation, control, monitoring and review of health, safety, and wellbeing within their service areas.
- 1.22. Where property is within their remit, appropriate manager(s) are appointed as the 'Responsible Person' for each property in their portfolio.

- 1.23. Service Directors, Heads of Service, Managers, Head Teachers, adhere to this policy and associated arrangements and their responsibilities detailed within this policy and arrangements, holding them to account if they do not.
- 1.24. Appropriate consideration is given to health, safety, and wellbeing when making strategic and operational decisions and is an integral part of the management arrangements.
- 1.25. They Chair directorate Health, safety and wellbeing subcommittee(s) involving both management and staff representatives to monitor the effectiveness of health, safety, and wellbeing arrangements.
- 1.26. Governors, Head Teachers and Heads of Service appropriately consider all relevant health, safety, and wellbeing implications, which are likely to affect the day to day / frontline operations and delivery of services and activities.
- 1.27. Escalation and communication of significant risks in the council as appropriate
- 1.28. All staff receive adequate training, instruction, information, and supervision to enable them to effectively carry out their responsibilities safely and effectively.
- 1.29. Where necessary and on recommendation from the corporate health, safety, and wellbeing team, suspend activities and services (including that provided by the Council contractors) where there is a likely imminent risk of serious injury or ill health or legislative breach, to employees or others.

## Heads of Service, Governors, Head Teachers, Managers and Supervisors

Heads of Services, Head Teacher, Manager and Supervisors are responsible for ensuring they are familiar with and adhere to this policy and subsequent arrangements for health, safety, and wellbeing and in summary must ensure that:

- 1.30. They lead by example and promote a positive health, safety, and wellbeing culture, demonstrating a clear commitment to achieving high standards of health, safety, and wellbeing management through positive leadership.
- 1.31. Adequate resources which are proportionate to the level of risk and that management arrangements and control measures are identified.
- 1.32. A local health, safety, and wellbeing policy (including organisation and arrangements) is developed and implemented where appropriate and necessary (in, schools, care homes, housing, and services with more complex operations), aimed at complying with the requirements of this corporate health, safety, wellbeing policy and associated arrangements.
- 1.33. They follow their responsibilities detailed within this Health, Safety and Wellbeing Policy, its Arrangements and Protocols, holding them to account if they do not.
- 1.34. Staff are competent to perform their role.
- 1.35. Holding Management meetings at least on a quarterly basis either dedicated to health, safety, and wellbeing or at least a standing agenda item within the meeting.
- 1.36. A 'Responsible Person' is appointed for every service property within their control, and ensure they are aware of their duties, have sufficient ability, resources, and training to be able to carry it out properly.

- 1.37. Any local Health, safety and wellbeing arrangements reflect the council's policy and arrangements.
- 1.38. They appoint sufficient numbers of suitably trained persons to ensure that suitable and sufficient risk assessments are conducted for all significant risks arising from all workplaces and activities for which they are responsible.
- 1.39. Health, safety and wellbeing arrangements, roles and responsibilities are clearly identified, and performance is monitored to ensure continual improvement. Plans are set at the appropriate level within the Service structure to provide assurance.
- 1.40. All health and safety risks in their areas of responsibility, which may have a negative effect on the Council, are escalated appropriately.
- 1.41. Their employees receive sufficient information, instruction, supervision and training including risk assessments and where necessary method statements, to carry out all their work activities competently and safely.
- 1.42. Appropriate employees are nominated for specific Health, safety and wellbeing responsibilities and duties.
- 1.43. Any contractors or service providers engaged to undertake works or services for the Council, have suitable arrangements for Health, safety and wellbeing and ensure effective monitoring arrangements are in place to monitor contractors and service providers.
- 1.44. All accidents, incidents, near misses and cases of occupational ill health are reported as soon as possible but within 5 working days and investigated as appropriate.
- 1.45. Employees who may be exposed to specific health risks are identified and provided with health surveillance and monitoring arrangements.
- 1.46. They actively ask staff and anyone for whom they are responsible, about their Health, safety and wellbeing and/or encourage them to raise any concerns and/or issues.
- 1.47. Equipment or products used comply with British standards, legislation, and industry guidance, is maintained and inspected in-line with requirements.

Day-to-day management responsibilities, in addition to their line management responsibilities, for implementing health and safety policies and arrangements rest with Heads of Service, Head Teachers, Managers, Team Leaders, and Supervisors, they are therefore responsible in their area for the detailed implementation of the Corporate Health, Safety and Wellbeing Policy and arrangements. Together they must ensure that effective collaboration is achieved across the Council. They are required to seek assurance that Health, safety and wellbeing is being managed effectively across their areas of control and that their Health, safety and wellbeing responsibilities are being met.

## All Staff and Employees

All staff are responsible for their own Health, safety and wellbeing, and the health, safety and wellbeing of others who may be affected by their acts and omissions. All staff must ensure they conduct their duties in a safe manner and in accordance with:

- the Council's Corporate Health, Safety and Wellbeing Policy and arrangements
- any Directorate/Service/School policies or arrangements as appropriate
- any specific arrangements and guidance relating to particular activities



- any relevant safety legislation and guidance

Council staff must be made aware of legal responsibility, under section 8 of the Health and Safety at Work etc. Act, not to interfere with or misuse anything, any objects, structures or systems of work, provided by the Council in the interests of health and safety. Staff must ensure they:

- 1.48. Co-operate fully with the council, for example undertake training and follow instructions, safe systems of work, fire safety procedures etc,
- 1.49. Take reasonable care of themselves and have due regard for others.
- 1.50. Where necessary help the council meet the duties imposed on it.
- 1.51. Don't interfere with or misuse anything provided for health and safety.
- 1.52. Bring any breaches of policies and arrangements to the council's attention via their Line Manager/Head of Service or the Corporate Health, Safety and Wellbeing team.
- 1.53. Report any incident/accident, ill health at work, near miss or hazard however minor, and every dangerous occurrence, including fire, using the approved reporting mechanisms as soon as possible but within 5 working days.
- 1.54. Notify the Corporate Health, Safety and Wellbeing team when suffering from a disease or medical condition which may be caused by, or made worse by, work activities.
- 1.55. Familiarise themselves and comply with relevant health, safety and wellbeing policies, arrangements, risk assessments and safe systems of work

Failure to comply with the council's Health, Safety and Wellbeing Policy and management arrangements may lead to disciplinary action. Such offences may be regarded as gross misconduct, which may result in dismissal.

## Head of Health, Safety, Wellbeing and Building Services

The Council's Head of Health, Safety and Wellbeing is responsible for:

- 1.56. Acting as the statutory competent person for the council as required by the Management of Health and Safety at Work Regulations, providing expert knowledge, skills and interventions to influence, challenge and support the achievement of a positive health and safety culture aligned to regulatory requirements.
- 1.57. Supporting and Advising the Council Leader, Chief Executive Officer, Corporate Director with responsibility for Health, safety and wellbeing to ensure the council is meeting its legal and moral obligations with regard to the health, safety and wellbeing of its employees and those affected by the council's activities.
- 1.58. Ensuring appropriate measures are taken to promote an effective health, safety and wellbeing culture within the Council.
- 1.59. Ensuring an appropriate Health, Safety and Wellbeing Policy and arrangements are developed that are aligned with the council's strategic aims.

- 1.60. Ensuring performance is regularly monitored and reviewed, including council key performance indicators.
- 1.61. Ensuring the strategic Health, safety and wellbeing board is suitable and effective.
- 1.62. Providing leadership for health, safety and wellbeing across the council, working with and co-ordinating the Health, Safety and Wellbeing team and advisors across the council.

In the absence of the Chief Executive Officer to act on their behalf, in their absence, is authorised to take appropriate and proportionate action to prevent serious harm to individuals or to the council.

## Corporate health, safety and wellbeing

The Corporate Health, Safety and Wellbeing team acts on behalf of the council on all health, safety and wellbeing matters.

Its role is to guide and shape the way that health, safety and wellbeing is managed and delivered across the council, obtaining assurance of effective health, safety and wellbeing management and statutory compliance. Providing professional advice and guidance on all matters relating to the health, safety and wellbeing of staff, pupils, governors, visitors, members and others and in particular the corporate health, safety and wellbeing are responsible for:

- 1.63. Ensuring that management is aware of its responsibilities and requirements to comply with relevant statutory provisions and corporate policies and arrangements and to identify where they are not compliant.
- 1.64. Providing competent health, safety and wellbeing assistance and advice to all areas of the council and schools in line with the council's policies and arrangements.
- 1.65. Develop and maintain the council's Health, Safety and Wellbeing Policy, Arrangements in conjunction with council staff.
- 1.66. Audit and monitor compliance with this policy, arrangements, advising and reporting on areas of Health, safety and wellbeing management that are lacking, inconsistent or not in accordance with good practice.
- 1.67. Advise and support Services/Schools/Teams where necessary on production of risk assessments and localised protocols.
- 1.68. Identify health, safety and wellbeing training, information, and instruction.
- 1.69. Carry out and support Senior Managers and managers to carry out accident investigations and to implement and monitor corrective actions.
- 1.70. Carry out inspections as required.
- 1.71. Undertake audits based on the management system to ensure it is being implemented across the Council.
- 1.72. Attend health, safety and wellbeing meetings as required.
- 1.73. Liaise regularly with council trade union health and safety representatives.
- 1.74. Act as the point of contact when liaising with enforcement authorities.
- 1.75. Keep abreast of and bring to the attention of those they support any relevant legislation changes.

- 1.76. Provide reports to the health, safety and wellbeing governance groups on trends identified from accident reporting, inspections, audits and any general observations based on enquiries.

In the absence of the Head of Health, Safety and Wellbeing to act on their behalf, in their absence, is authorised to take appropriate and proportionate action to prevent serious harm to individuals or to the council.

## Contractors and service providers

The council has a duty to provide a safe working environment for contractors working on council owned, managed, and controlled premises. The council must take all reasonable steps to ensure that the contractor is competent to undertake the work required in a healthy and safe manner.

Contractors working on council owned, managed, and controlled premises must be informed of the council's emergency procedures relevant to them and must be advised of any known hazards and risks for them to work safely and, where relevant, for inclusion within their risk assessments/safe systems of work. In each case the sponsor of that contractor or service provider will be responsible for ensuring the relevant information is made available to the contractor or service provider.

Contractors and service providers must comply with the council's corporate health, safety and wellbeing policies and arrangements and any relevant local protocols. Specifically, contractors and service providers are responsible for ensuring:

- 1.77. They comply with all health and safety legislation and relevant industry guidance.
- 1.78. Site and task specific risk assessments/method statements are provided before starting work.
- 1.79. Equipment or products used comply with British standards, legislation, and industry guidance.
- 1.80. They have suitable and sufficient insurance in place prior to commencing work.
- 1.81. They comply with any local procedures and safe systems of work.
- 1.82. The competence of all appointees, workers, and sub-contractors are vetted to include their training to the necessary competency standards required.
- 1.83. They are authorised to carry out the work and comply with local arrangements for signing on and off the site.
- 1.84. Hazard and risk information is provided to their workers where applicable.
- 1.85. They report incidents/accidents/near misses in accordance with the contract without delay and ensure appropriate investigations are undertaken.
- 1.86. They cooperate, comply, and assist in accident/incident investigations, which may include providing evidence of suitable health, safety and wellbeing arrangements, training documents and servicing arrangements for equipment being used or being provided for use.
- 1.87. Delivery drivers are made aware of any site-specific hazards made known to them by the requesting officer prior to arrival on the premises.

- 1.88. Deliveries are made safely to the premises without additional risk to the council's employees/service users/pupils/any other person(s) who continue to use/visit the premises at the time of delivery.

## Occupational health

Occupational health is provided by a contracted service provider, which must ensure:

- 1.89. The provision of an appropriate level of expertise, to assist the council maintain a healthy workforce, providing necessary advice and guidance regarding health and wellbeing, for example health surveillance, routine immunisations, and so on.
- 1.90. Advising on candidates' fitness for work to undertake the duties concerned.
- 1.91. Advising managers of the prognosis for the return to work or continuing absence of their employees.
- 1.92. Providing pro-active health promotion services and expert advice to clients and employees to help the workforce to stay healthy.
- 1.93. Providing health surveillance and health screening activities to enable the council to meet its statutory obligations.
- 1.94. Providing expert advice and guidance following health related incidents and/or accidents.

## Building services, premises, estates and housing

In addition to their individual responsibilities, those who are identified as in control and responsible for council premises and buildings, who act as the 'landlord' on behalf of the council, premises, or land it owns, and leases are safe and secure to occupy and use by users/tenants/staff are responsible for:

- 1.95. Carrying out their Construction Design and Management (CDM) duties as required. This will include reviewing contractor's health and safety competence against a recognised standard prior to allowing contractors onto any related framework.
- 1.96. The provision of an environment suitable for its intended use (for example office, residential, education, care, and so on).
- 1.97. Ensuring that the council estate is designed, constructed and managed in a way that effectively identifies and manages health and safety related risks.
- 1.98. Ensuring that health, safety and wellbeing obligations are clearly documented within any lease agreements.
- 1.99. Producing and maintaining building statutory compliance and building safety information.
- 1.100. Seeking assurance that statutory requirements in relation to the estate are being complied with.
- 1.101. Informing estate and building occupiers/users of the actions they may need to take to maintain their Health, safety and wellbeing.
- 1.102. Consulting with building occupiers/users on any changes to the building that may have an impact on their health and safety.

- 1.103. Seeking assurance that third party accommodation provided for staff or other in relation to the council is safe and meets statutory requirements.
- 1.104. Carrying out contractor inspections to ensure compliance with Section 3 of the Health and Safety at Work etc. Act where they are contracted to do so.
- 1.105. Ensuring that all work undertaken on behalf of the council, by contractors, is undertaken with the appropriate levels of health and safety built in where they are contracted to do so.
- 1.106. To ensure that all contract documentation adequately addresses health and safety performance and that suitable monitoring arrangements are established to ensure the required level of performance is met where they are contracted to do so.
- 1.107. To ensure that compliance testing and inspection regimes related to property, are carried out and delivered.
- 1.108. To action any necessary works arising for such inspections and statutory inspections in discussion with the relevant manager/headteacher.
- 1.109. To maintain accurate records and of required tests, inspections and certificates for those areas falling within the providers remit monitor.

## School Governors

In addition to their individual responsibilities as employees of the council, School Governors are responsible for:

- 1.110. Ensuring they are aware of their duties and responsibilities under safety legislation and that the headteacher is aware of and implements the council's Health, Safety and Wellbeing Policy and arrangements as necessary.
- 1.111. Considering health, safety and wellbeing when developing, amending, and delivering school policies and when allocating responsibilities and resources.
- 1.112. Ensuring so far as it is within their power that school specific health, safety and wellbeing arrangements are developed and effectively implemented.

## Head Teachers

In addition to their individual responsibilities as identified in this policy as employees of the council, Head Teachers are responsible for:

- 1.113. Ensuring the Health, safety and wellbeing of employees, pupils and others who may be affected by the school premises or activities or work.
- 1.114. Ensuring an appropriate school specific policy is developed and effectively implemented and its requirements are effectively communicated.
- 1.115. Ensuring the school premises are maintained, inspected, and monitored in accordance with Council Health, safety and wellbeing arrangements, including those associated with the assessment and appointment of contractors.
- 1.116. Cooperating with the council on matters relating to health, safety and wellbeing.



# Training

To comply with legislation staff must have the training, skills, knowledge and experience to carry out their duties safely. The council also takes into account staff capabilities to ensure the demands of their job and the activities they undertake do not exceed their ability to do the work without risk to themselves or others.

Everyone in the council needs adequate Health, safety and wellbeing training. Training helps people to gain the skills and knowledge, and ultimately the competence, to carry out their work or activities safely and without risk to their health. The council does not believe that training is only about formal 'classroom' courses – it can be delivered in a number of ways, for example:

- informal, 'on the job' training
- written instructions
- online information
- simply telling someone what and how to do something

The training delivered will be assessed to determine the level of training required. Staff must be given information about the health, safety and wellbeing risks involved in their work, and the steps that need to be taken to reduce or remove those risks. The council will develop a training matrix specifically in relation to Health, safety and wellbeing which outlines those training requirements which are deemed mandatory and statutory for specific roles. The matrix will be reviewed periodically to ensure appropriate training is delivered and made available.

Each council arrangement must outline the training required specific to the arrangement or policy to ensure those who are responsible may effectively ensure that training is undertaken. Training in relation to this policy includes:

- Managers health and safety induction
- Staff health and safety awareness
- Fire safety awareness

# Monitoring Compliance

Element to be monitored	Lead for monitoring	Tool for Monitoring	Frequency	Reporting Arrangements
Responsibilities under this policy	Corporate directors, directors, Head(s), Senior Managers; Line Manager(s); head teachers, governors, and members.	Determined by each individual service/school/department and team. Corporate Health, Safety and Wellbeing team auditing and inspection	Periodically, risk-based approach or following a significant change or incident or failing, whichever is soonest.	Team/departmental meetings; Directorate Management Team Meetings; health, safety and wellbeing Groups / Board(s); Quarterly reports and minutes of meetings

Arrangement Suitability, Effectiveness and Implementation	Corporate health, safety and wellbeing	Audit and Inspection Programs. Enquiries both formal and informal. Spot checks, incident monitoring. Risk assessment review. Arrangements review.	Periodically, risk-based approach or following a significant change or incident or failing, whichever is soonest.	Corporate Health and Safety Reports, Audit reports and inspection reports. Building Services and Facilities Management reports.
Incidents and complaints	Corporate Health, safety and wellbeing Corporate directors, directors, Head(s), Senior Managers; Line Manager(s); head teachers, governors, and members.	Incident reports, reviews, and investigation. Risk Register(s). Fault reporting records and compliance statistics.	When reported, ad-hoc and periodically when necessary.	Corporate Health and Safety Reports, Individual incident reports and quarterly reports. Compliance reporting.

## Legislation

Health, safety and wellbeing may fall under more than one piece of legislation or regulations, however the principle guiding legislation is:

- The Health and Safety at Work Act (HASWA)
- The Management of Health and Safety at Work Regulations (MHSWR)
- Other regulations as outlined in our legal register.

## Associated documents

### Council arrangements

- All health, safety and wellbeing policies and arrangements are related and should be read in conjunction with this overarching policy.

### Council forms

- All Health, safety and wellbeing forms are related and should be read in conjunction with the overarching policy.

### Council guides

- All health, safety and wellbeing guides are related and should be read in conjunction with the overarching policy.

## External information and guides

- [www.hse.gov.uk](http://www.hse.gov.uk)
- [Managing for Health and Safety](#)
- [Success health and safety management HSG 65](#)
- [Five steps to success](#)

## Document control

This arrangement has been issued and managed by Corporate Health, Safety and Wellbeing.

## Change Record

Version	Author	Date	Amendment
12	Brent Schwarz	August 2025	<p>Whole Policy review and rewrite following organisational redesign and management review. Consultation and feedback included:</p> <ul style="list-style-type: none"> <li>• Corporate Health, Safety and Wellbeing department subject matter experts</li> <li>• Health and Safety Executive (HSE)</li> <li>• Key stakeholders from all council directorates directorate</li> <li>• Key stakeholders from central hub services</li> <li>• Key stakeholders from Trade Unions</li> <li>• Senior officers of the council</li> </ul>



# Brighton & Hove City Council

## Cabinet

## Agenda Item 42

**Subject:** Rough Sleeping & Single Homeless Services Commissioning

**Date of meeting:** 25<sup>th</sup> September 2025

**Report of:** Cabinet Member for Housing

**Lead Officer:** Corporate Director Homes & Adult Social Care

**Contact Officer:** Harry Williams – Director of Housing People Services  
Aaron Burns – Head of Temporary & Supported Accommodation

**Ward(s) affected:** (All Wards);

**Key Decision:** Yes

**Reason(s) Key:** Expenditure which is significant having regard to the expenditure of the City Council's budget, namely above £1,000,000.

### For general release

#### 1. Purpose of the report and policy context

- 1.1 This report seeks Cabinet approval to recommission the city's core Street Outreach Service (SOS), which is due to end in March 2026.
- 1.2 The recommissioning of this service is part of how Brighton & Hove City Council is delivering on Homes for Everyone, by improving the housing support available for residents. It also aligns with the council's current Homelessness & Rough Sleeping Strategy and upcoming strategy for 2025 to 2030.

#### 2. Recommendations

- 2.1 Cabinet agrees to recommission the SOS ending 31 March 2026, for 3-years, with a possible extension of up-to 4-years (2+ 2+ years) with an estimated value of £1,635,000 over three years.
- 2.2 Cabinet delegates authority to Corporate Director – Homes and Adult Social Care to procure and award the new contract commencing April 2026, in consultation with Cabinet Member for Homes.

#### 3. Context and background information

- 3.1 Each November, a snapshot of the number of people sleeping rough on a single night is collected as part of a national return. For Brighton & Hove, the figure recorded for one night in November 2024 was 76.
- 3.2 As of March 2025, Brighton & Hove had a rough sleeping rate of 30.0 per 100,000 people, significantly higher than both the South East average (11.5)



and the England average (13.38). Alongside Portsmouth, Brighton & Hove ranked joint 19th highest for rough sleeping rates across England. While the number of people sleeping rough in the city fluctuates, the overall trend is increasing, mirroring national and regional patterns.

- 3.3 The SOS is the city's primary frontline response to rough sleeping. It is responsible for identifying new people who are experiencing rough sleeping and supporting existing ones.
- 3.4 The SOS engage with and rapidly assess the needs of those living on the streets and provide appropriate support to enable individuals to access accommodation, support, or to relocate.
- 3.5 The SOS also organises and runs bi-monthly street counts of people who are experiencing rough sleeping and jointly facilitates the Autumn rough sleeping count or estimate with the local authority. The service also supports Severe Weather Emergency Provision (SWEP) in Brighton & Hove.
- 3.6 The outcomes of SOS over the previous 2 financial years:

<b>Outcome</b>	<b>2023-24</b>	<b>2024-25</b>
Number of people experiencing rough sleeping engaged with	661	559
Number of supported into accommodation	300	274
Of above, the number of people supported to reconnect	42	39
Of above, the number of people supported into 'off street' or supported accommodation	167	111

#### **4. Recommissioning of the Street Outreach Service**

- 4.1 The procurement will follow an open tender process, in line with the requirements of the Procurement Act 2023. This reflects the specialist nature of the service and ensures compliance with legal thresholds.
- 4.2 The current contract, valued at £474,000 per year, was last reviewed in 2020 and is scheduled to end in March 2026. Future budgets will need to account for rising costs. Based on current projections, the total cost of the SOS service could reach £1,635,000 over three years.
- 4.3 While the proposed contract term is 3 years with a possible extension of up to 4 years (2+2), procurement colleagues have advised that suppliers may only price for the initial 3-year term. A longer initial term may be more commercially beneficial and should be considered to improve market engagement.
- 4.4 The recommissioning of the SOS service was not included in Brighton & Hove City Council's Annual Procurement Plan for 2025/26, approved by Cabinet in February 2025. This exclusion was due to ongoing uncertainty

around Central Government Grant Funding for homelessness prevention and rough sleeping services beyond 2026/27.

- 4.5 Cabinet was briefed on this exclusion at Informal Cabinet in August 2025. Councillor Joy Robinson raised a query regarding the forward plan, which was addressed at that time.
- 4.6 While external funding confirmation is still pending, the SOS service is currently fully funded through the Council's core budget. As a result, it was excluded from the current recommissioning cycle for single adults and rough sleeping services. This decision reflects the fact that the SOS service is not reliant on external funding, with its continuation already secured through internal budget allocations.
- 4.7 The 15% drop in engagement figures between 2023/24 and 2024/25 should be contextualised. While numbers declined in 2024/25, they are expected to rise again in 2025/26. This fluctuation may be due to external factors such as grant funding reductions. It is important to clarify whether the contract is volume-driven or resource-driven to ensure commercial viability.
- 4.8 Decisions on the other services within the same commissioning cycle will be made by Corporate Director – Homes & Adult Social Care, in consultation with Cabinet Member for Homes. These services include: Non hostel based supported accommodation (Housing First) Move through to independence (Transition & Resettlement)
- 4.9 There is no formal handoff between SOS and Housing First or Transition & Resettlement. Housing First is allocated via the supported accommodation panel, and SOS can make direct referrals to Housing Options. This should be clarified to avoid assumptions about co-terminus commissioning strategies.

## **5. Analysis and consideration of alternative options**

- 5.1 In considering the future of the SOS, three alternative options were explored alongside the preferred approach of recommissioning. These alternatives include: not commissioning the service at all, commissioning only part of the service, and bringing the service in-house.

### **Recommended Option: Recommission the Full Street Outreach Service**

- 5.2 The **recommended option** is to recommission the full SOS through a competitive open tender process, commencing in April 2026. This approach ensures continuity of Brighton & Hove's frontline response to rough sleeping, which has consistently delivered high engagement and accommodation outcomes. Over the past two years, the SOS supported over 1,200 individuals, with nearly half successfully moved into accommodation. The service also plays a critical role in coordinating street counts, facilitating Severe Weather Emergency Provision (SWEP), and supporting reconnection efforts. Recommissioning the full service allows the council to maintain a comprehensive, trauma-informed model that is responsive to the complex and evolving needs of people experiencing rough sleeping.

- 5.3 This as it best aligns with the council's strategic priorities, including the forthcoming Homelessness and Rough Sleeping Strategy (2025–2030), and supports the delivery of Homes for Everyone. It also reflects feedback from service users and stakeholders, who emphasised the importance of trust, consistency, and person-centred support.

#### **Alternative option 1: Do not commission the service**

- 5.4 One option would be to allow the current SOS contract to expire in March 2026 without commissioning a replacement. This would effectively end the council's dedicated frontline response to rough sleeping.
- 5.5 The potential discontinuation of the SOS presents a significant risk to Brighton & Hove's coordinated response to rough sleeping. Each year, the SOS engages with hundreds of individuals, offering vital support that helps many move into accommodation or reconnect with services. Without this frontline presence, the city would lose a critical mechanism for identifying and assisting those most in need, leaving vulnerable people without a clear pathway off the streets.
- 5.6 This option is **not recommended** due to the significant risks to individuals, communities, and the council's strategic objectives.

#### **Alternative option 2: Commission part of the service**

- 5.7 Another option would be to commission a reduced version of the SOS, focusing on core functions such as initial engagement and assessment, while removing or scaling back elements such as coordination of street counts and Severe Weather Emergency Provision (SWEP).
- 5.8 Delivering only a partial Street Outreach Service (SOS) risks fragmenting the city's approach to tackling rough sleeping. Without a fully integrated service, gaps in support are likely to emerge, leading to poorer outcomes for individuals and inefficiencies in service delivery.
- 5.9 This option is **not recommended** as it compromises the effectiveness of the city's rough sleeping response.

#### **Alternative option 3: Internalise the service**

- 5.10 A third option would be to internalise the SOS, delivering it directly through council staff rather than commissioning an external provider. Transitioning the SOS to an in-house model presents several challenges that could compromise its effectiveness. The council does not possess the specialist skills, infrastructure, or operational flexibility required to deliver a responsive outreach service. This could limit the ability to meet the complex and evolving needs of people sleeping rough. In-house delivery also carries the risk of higher costs.
- 5.11 Lastly, external providers often bring added value that is difficult to replicate internally. Their connections to the voluntary sector, use of lived experience,

are key strengths of the current model. Moving away from this could result in a more standardised and less dynamic service, limiting the city's overall approach to tackling homelessness.

5.12 As a result, this option is also **not recommended**.

## **6. Community engagement and consultation**

6.1 Consultation with service users was undertaken through three engagement events hosted by YMCA Brighton, BHT Sussex, and Just Life. A total of 23 individuals with lived experience of rough sleeping participated in these sessions.

6.2 In addition to the engagement events, all providers within the Rough Sleeper and Single Homelessness Support Pathway supported service users to complete an online consultation survey. The survey focused on the support individuals felt was needed when experiencing rough sleeping and invited feedback on their personal experiences. A further 45 responses were received through this online consultation.

6.3 Key themes emerging from the service user feedback included:

- The importance of trust, dignity, and person-centred support.
- A need for consistency and follow-up support.
- Accommodation preferences, including gender-specific provision, lower-density housing, and access to sheltered spaces during adverse weather.
- Improved timing and frequency of outreach visits.
- Enhanced mental health and crisis response.
- Barriers faced by marginalised groups, including verification processes and lack of access for undocumented individuals.

6.4 Stakeholder consultation was also undertaken with internal and external partners who work directly with individuals experiencing rough sleeping and the current Street Outreach Service. A total of 67 responses were received. Stakeholders provided valuable insight into partnership working and the definition of rough sleeping, which has informed amendments to the new service specification.

6.5 Feedback relevant to the Street Outreach Service specification and suggestions for future service design have been incorporated into a new contract, which would commence April 2026, subject to Cabinet's decision.

## **7. Financial implications**

7.1 The recommissioning of Brighton & Hove's Street Outreach Service and associated homelessness contracts, due to end in March 2026, is expected to incur higher costs because of inflation and wage increases. The current annual contract is valued at £474,000, and future budgets will need to reflect these rising expenses. Estimates will be for a 15-20% increase costs as the current contract value was set in 2020.

- 7.2 The commissioning strategy aligns with national policy, focusing on integrated support and performance-based procurement. The increased temporary accommodation costs and a shrinking housing stock are putting unsustainable pressure on the council's finances.
- 7.3 To support financial resilience, finance will work with the service to:-
- Engage proactively with service providers to ensure cost-effective delivery.
  - Design flexible services that can adapt to funding levels, should additional funding be received from MHCLG.
  - Monitor funding risks closely, particularly uncertainties surrounding future MHCLG allocations.
  - Maximise national funding opportunities, such as RSPARG, to help offset local budget pressures.
- 7.4 This strategic approach aims to protect frontline services and align with both local and national priorities.

Name of finance officer consulted: Ferrise Hall

Date consulted: (31/07/2025)

## **8. Legal implications**

- 8.1 The Council is required to comply with the Procurement Act 2023 in relation to the procurement and award of contracts above the relevant financial thresholds for services, supplies and works. This procurement is above the relevant threshold of £214,904 (inclusive of VAT) for services and the rules governing open tenders will apply.
- 8.2 The Council's Contract Standing Orders (CSOs) will also apply.

Name of lawyer consulted: Eleanor Richards Date consulted 04/09/2025

## **9. Risk implications**

- 9.1 As outlined in paragraphs 4.2 to 4.4, the recommissioning of the SOS takes place in a context of significant financial uncertainty.
- 9.2 Inflation, wage increases, and the growing complexity of need among people experiencing rough sleeping are driving up provider costs. The current SOS contract, set in 2020, may not reflect the cost of delivering the SOS, and there is a risk that providers may be unable to deliver the service to the required standard, or may choose not to bid at all, within the financial envelope.
- 9.3 To help mitigate this risk, flexible service design will be considered where appropriate, allowing for scaling based on available funding. Further, as outlined in paragraphs 7.1 to 7.4, financial modelling has reflected anticipated cost increases, and uplifts accounted for.

## **10. Equalities implications**



- 10.1 An Equalities Impact Assessment (EIA) has been completed as part of this recommissioning process. The assessment considered data on individuals experiencing rough sleeping in comparison with the general population. It identified several protected characteristics and areas of disproportionate impact, including homelessness and socio-economic disadvantage. The SOS is commissioned directly by the Council to support individuals affected by these disadvantages. Not retendering the service would remove the city's primary frontline response, with significant implications for individuals with protected characteristics.
- 10.2 The EIA analysis highlights that men, people with disabilities, and individuals who are Black or racially minoritised are overrepresented among those experiencing rough sleeping compared to the general population. The current service delivers a person-centred, trauma-informed approach, tailored to the needs of service users in relation to their protected characteristics. This approach will remain embedded within the new service specification.
- 10.3 The EIA and consultation feedback have also identified areas for improvement in monitoring and data collection, particularly in relation to faith and religion, carers, and experiences of violence beyond domestic abuse. Actions have been agreed to amend the new specification to reflect these areas. In addition, improvements will be made to data monitoring systems, enabling the service to use this information to inform future frontline delivery and strategic planning.

## **11. Sustainability implications**

- 11.1 Sustainability considerations are embedded in the commissioning process. Providers will be required to demonstrate environmental responsibility and contribute to social value outcomes, including community engagement and volunteer involvement.

## **12. Health and Wellbeing Implications:**

- 12.1 The recommissioning of rough sleeping and single homelessness services has notable health and wellbeing implications. The Health Counts 2024 Survey identified health inequalities in Brighton & Hove, particularly affecting people in insecure housing or experiencing rough sleeping.
- 12.2 People experiencing rough sleeping face some of the highest levels of physical and mental ill-health in the city. The survey found that 0.9% of adults live in temporary or emergency accommodation, and this group reported high rates of mental ill-health, substance misuse, and barriers to healthcare services<sup>1</sup>.
- 12.3 Mortality among people experiencing rough sleeping remains an area of concern. Data from the Office of National Statistics<sup>2</sup> shows that among homeless people, the mean age at death was 45.9 years for males and 43.4

---

<sup>1</sup> [Health Counts](#)

<sup>2</sup> [Deaths of homeless people in England and Wales - Office for National Statistics](#)

years for females in 2019; in the general population of England and Wales, the mean age at death was 76.1 years for men and 80.9 years for women.

- 12.4 Recommissioned services will be expected to work closely with partners to deliver integrated, trauma-informed support, reduce emergency admissions to health services, and contribute to the Council's wider health equity goals. These services are essential to addressing the city's most acute health inequalities.

## **13. Other Implications**

### **Procurement implications**

- 13.1 The value of this service is over the legal threshold and will be procured in line with the Procurement Act 2023. The open tender process will be used, and clauses will be included in the terms and conditions to allow for changes to services and boundaries that could result from the Local Government Review.
- 13.2 Strategic commissioning post-devolution is being picked up pan-Sussex by Housing Directors. Joint commissioning with East Sussex District & Borough Councils is not recommended at this stage due to differing service models and strategic risks. The BHCC SOS service is significantly larger and structurally different from neighbouring authorities, making joint contracting impractical.

### **Community Safety implications**

- 13.3 The Street Outreach Service and associated homelessness support services contribute directly to the Council's duties under Section 17 of the Crime and Disorder Act 1998. These services help reduce anti-social behaviour (ASB) and visible street homelessness by engaging with individuals who are rough sleeping or at risk of homelessness, many of whom may be vulnerable to exploitation, substance misuse, or reoffending.
- 13.4 The Street Outreach Team includes a dedicated ASB lead officer and works in close partnership with Sussex Police, community safety teams, and local services to address complex cases and reduce repeat incidents. This approach supports the aims of the Council's Homelessness and Rough Sleeping Strategy 2020–2025, and emerging strategy for 2025-2030, which highlights the need for coordinated, citywide action to reduce the impact of rough sleeping on individuals and communities.
- 13.5 Recommissioning these services will ensure continued alignment with the city's community safety priorities and support individuals to transition away from street-based lifestyles into safer, more stable environments.

## **14. Conclusion**

- 14.1 Recommissioning the Street Outreach Service maintains a coordinated, effective response to rough sleeping in Brighton & Hove. The proposed approach ensures continuity of vital frontline services, reflects current and

emerging needs, and aligns with the council's strategic priorities, including the forthcoming Homelessness and Rough Sleeping Strategy.

