Brighton & Hove City Council

Cabinet

Date: **11 December 2025**

Time: **2.00pm**

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

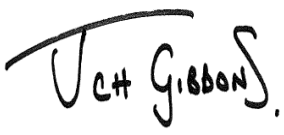
Members: **Councillors:** Sankey (Chair), Taylor (Deputy Chair), Alexander, Allen, Daniel, Miller, Muten, Robins, Rowkins and Williams

Contact: **John Peel**
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Chief Executive
Hove Town Hall
Norton Road
Hove BN3 3BQ

Date of Publication - Wednesday, 3 December 2025

AGENDA

Part One **Page**

75 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

76 MINUTES **To Follow**

To consider the minutes of the meeting held on 13 November 2025

77 CHAIR'S COMMUNICATIONS

78 CALL OVER

79 PUBLIC INVOLVEMENT

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

(a) **Petitions:**
To receive any petitions presented by members of the public.

(b) **Written Questions:**
To receive any questions submitted by the due date of 12 noon on the 5 December 2025.

(c) **Deputations:**
To receive any deputations submitted by the due date of 10am on the 1 December 2025.

80 ISSUES RAISED BY MEMBERS

To consider the following matters raised by Members:

(a) **Written Questions:**
To consider any written questions

81 MATTERS REFERRED TO THE EXECUTIVE

82 REPRESENTATIONS FROM OPPOSITION MEMBERS

83 TARGETED BUDGET MANAGEMENT (TBM) 2025/26 MONTH 7 (OCTOBER) **7 - 88**

Contact Officer: *James Hengeveld*
Ward Affected: *All Wards*

84 GENERAL FUND DRAFT BUDGET & RESOURCE UPDATE - 2026-27 TO 2029-30 **89 - 234**

Contact Officer: *John Hooton*
Ward Affected: *All Wards*

85 SUSTAINABILITY PLAN FOR LIBRARIES **235 - 424**

Contact Officer: *Ceris Howard*
Ward Affected: *All Wards*

86 DEVOLUTION UPDATE **To Follow**

Contact Officer: *Tom Cottam*
Ward Affected: *All Wards*

87 OUR CITY TRANSPORT PLAN 2035 **425 - 692**

Contact Officer: *Andrew Westwood*
Ward Affected: *All Wards*

88 REGULATOR OF SOCIAL HOUSING - RESPONSE TO REGULATORY JUDGEMENT INCLUDING PROCUREMENT OF STOCK CONDITIONS CONTRACTOR **693 - 712**

Contact Officer: *Martin Reid*
Ward Affected: *All Wards*

89 HOMELESSNESS AND ROUGH SLEEPING STRATEGY 2025 TO 2030 **713 - 932**

Contact Officer: *Steve Morton*
Ward Affected: *All Wards*

90 ROYAL PAVILION & MUSEUMS TRUST SERVICE FEE 2026-31 **933 - 938**

Contact Officer: *Louise Peim*
Ward Affected: *All Wards*

PART TWO

91 ROYAL PAVILION & MUSEUMS TRUST SERVICE FEE 2026-31 (EXEMPT CATEGORY 3) **939 - 946**

Contact Officer: *Louise Peim*
Ward Affected: *All Wards*

92 PART TWO MINUTES OF THE PREVIOUS MEETING **To Follow**

To consider the Part Two minutes of the meeting held on 13 November 2025.

93 PART TWO PROCEEDINGS

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

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

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Brighton & Hove City Council

Cabinet

Agenda Item 83

Subject: **Targeted Budget Management (TBM) 2025/26 Month 7 (October)**

Date of meeting: **Thursday, 11 December 2025**

Report of: **Cabinet Member for Finance & City Regeneration**

Contact Officer: **Name: John Hooton, Director of Finance & Property**
Haley Woollard, Deputy Chief Financial Officer
Email: john.hooton@brighton-hove.gov.uk
haley.woollard@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 The Targeted Budget Monitoring (TBM) report is a key component of the council's overall performance monitoring and control framework. This report sets out an indication of forecast risks as at Month 7 on the council's revenue and capital budgets for the financial year 2025/26. Effective financial management is a core component of providing a well-run council, a key priority within the Council Plan that demonstrates that the council manages within its finite resources and optimises the use of those resources.

2 Recommendations

2.1 Cabinet notes the forecast risk position for the General Fund, which indicates a potential forecast overspend risk of £7.776m.

2.2 Cabinet notes the forecast overspend risk for the separate Housing Revenue Account (HRA), which is an overspend of £1.216m.

2.3 Cabinet notes the forecast overspend risk for the ring-fenced Dedicated Schools Grant, which is an overspend of £2.463m.

2.4 Cabinet notes the forecast position on the Capital Programme which is an underspend variance of £10.963m.

2.5 Cabinet approves the capital budget variations and re-profiling requests set out in Appendix 6.

2.6 Cabinet approves the new capital schemes requested in Appendix 7.

2.7 Cabinet notes the Treasury Management mid-year review as set out in Appendix 8 and summarised in paragraph 9.

3 Context and background information

Overview of Position

3.1 The forecast outturn 'risk' for 2025/26 at this stage is an overspend of £7.776m on the General Fund revenue budget, representing 2.8% of the net budget.

3.2 The forecast outturn includes a significant level of savings to be at risk; the report indicates that £5.761m (36%) of the substantial savings package in 2025/26 of £15.789m is potentially at risk.

3.3 The Month 7 forecast gives a clearer indication of trends than earlier forecasts. The forecast shows continued improvement, with the forecast overspend being £7.710m lower than the early Month 2 indications and £1.630m lower than the position reported at Month 5. However, the forecast remains a significant overspend risk for this time of year, particularly as significant spending and recruitment controls have remained in place since November 2024 which were implemented (and subsequently strengthened in January 2025) to assist with managing down the 2024/25 forecast overspend back to a balanced position.

3.4 Further measures have been implemented during 2025/26 to assist in managing down the forecast position which include:

- Creation of a new officer-led Savings & Innovation Delivery Board which oversees and monitors the delivery of the 2025/26 savings and recovery plans.
- Development of service level financial recovery plans to mitigate and address overspends.
- Development of transformation plans to address demand and costs, particularly in key areas with the most significant demand pressures, including Temporary Accommodation, and Children and Adult social care.

3.5 The council's reserve levels are very low and are therefore unable to withstand substantial drawdown that could be required to balance a significant overspend. It is therefore crucial that further measures are considered to continue to manage down the forecast overspend risk.

3.6 The TBM5 report outlined a number of further measures to be explored to assist in managing the current forecast risk position. The measures that are currently being explored or implemented are as follows:

- **Emergency and temporary accommodation** – actions on increasing the supply of TA and prevention work to reduce demand is being progressed at pace. This is the most critical issue for the Council to address both in year and future year pressures;
- **Spending and recruitment controls** – additional restrictions have been agreed to further delay recruitment and pausing non-essential spend.
- **A review of earmarked reserves** – A review of earmarked reserves has been undertaken, and the budget report, elsewhere on this agenda,

recommends the release of £1.041m of earmarked reserves to a General Risk Reserve to cover all risk types.

- The Chief Finance Officer will undertake a further review of earmarked reserves to ascertain whether this un-earmarking could increase to further bolster the risk reserve to offset the expected overspend for 25/26.
- Use of any available 'risk provisions' or unexpected one-off resources to mitigate the position in the short term. The latter cannot normally be estimated and is only known when and if it arises.

3.7 Housing People Services has made progress against the additional financial measures agreed between TBM Month 5 and TBM Month 7, with a tangible increase in savings achieved. This improvement reflects a sustained focus on prevention, move-on strategies, and innovative cost reduction measures, resulting in both a reduction in overspend and a lower proportion of savings considered at risk. Despite these positive developments, the service continues to face significant financial pressures, particularly due to persistent and growing demand for temporary accommodation, which has led to an overall increase in the projected overspend in this area for TBM Month 7.

Targeted Budget Management (TBM) Reporting Framework

3.8 That The TBM framework focuses on identifying and managing financial risks on a regular basis throughout the year. This is applied at all levels of the organisation from Budget Managers through to Cabinet. Services monitor their TBM position on a monthly or quarterly basis depending on the size, complexity or risks apparent within a budget area. TBM therefore operates on a risk-based approach, paying particular attention to mitigation of growing cost pressures, demands or overspending through effective financial recovery planning together with more regular monitoring of high-risk demand-led areas as detailed below.

3.9 The TBM report is normally split into the following sections:

i) General Fund Revenue Budget Performance
ii) Housing Revenue Account (HRA) Performance
iii) Dedicated Schools Grant (DSG) Performance
v) Capital Investment Programme Performance
vi) Capital Programme Changes
vii) Implications for the Medium-Term Financial Strategy (MTFS)
viii) Comments of the Chief Finance Officer (statutory S151 officer)

3.10 The report may also include a Treasury Management update from time to time. This is required to comply with the updated Treasury Management Code which requires a minimum of quarterly reporting. Cabinet already receives mid-year and end-of-year reviews and therefore two additional interim reports will be provided via an appropriate TBM report to ensure compliance with reporting requirements. A Treasury Management mid-year review is included at Appendix 8 and the key points are summarised in paragraph 8.

4 General Fund Revenue Budget Performance (Appendix 4)

4.1 The table below shows the forecast outturn for council-controlled revenue budgets within the General Fund. These are budgets under the direct control

and management of the Corporate Leadership Team. More detailed explanation of the variances can be found in Appendix 4.

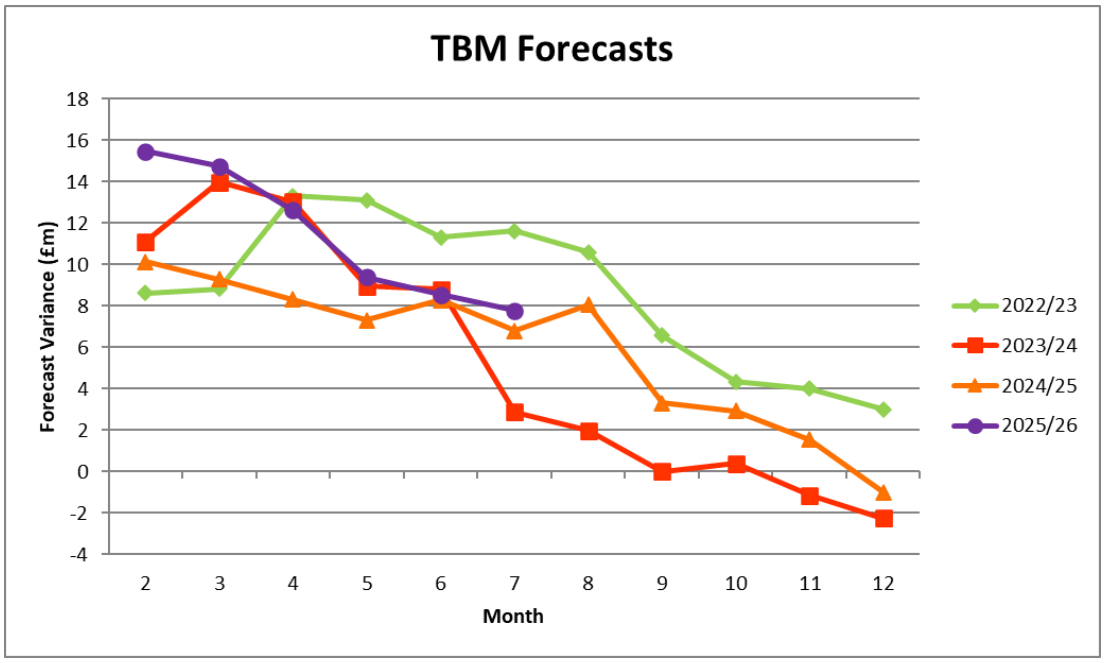
Forecast Variance Month 5 £'000	Directorate	TBM Budget Month 7 £'000	Forecast Outturn Month 7 £'000	Forecast Variance Month 7 £'000	Forecast Variance Month 7 %
1,931	Families, Children & Wellbeing	79,774	81,219	1,445	1.8%
7,431	Homes & Adult Social Care	121,373	129,605	8,232	6.8%
(1,793)	City Operations	50,802	49,009	(1,793)	-3.5%
1,353	Central Hub	33,207	33,595	388	1.2%
8,922	Sub Total	285,156	293,428	8,272	2.9%
484	Centrally-held Budgets	(8,797)	(9,293)	(496)	-5.6%
9,406	Total General Fund	276,359	284,135	7,776	2.8%

4.2 The General Fund includes general council services, corporate budgets and central support services. Corporate Budgets include centrally held provisions and budgets (e.g. insurance) as well as some cross-cutting value for money savings targets. Note that General Fund services are accounted for separately to the Housing Revenue Account (Council Housing). Note also that although part of the General Fund, financial information for the Dedicated Schools Grant is shown separately as this is ring-fenced to education provision (i.e. Schools).

4.3 The chart below shows the monthly forecast variances for 2025/26 and the previous three years for comparative purposes. This indicates that forecast risk early in the year has been higher in recent years. This is partly due to:

- Pay awards coming in higher than the budget assumptions due to persistent inflation.
- The requirement to deliver successive, large savings programmes which becomes increasingly challenging over time.
- Continuing economic conditions which are impacting external provider costs, many income sources (demand), and recruitment costs and which is difficult to predict with accuracy.

2023/24, was also exceptional in terms of the availability of one-off resources of over £10m across the year, which significantly aided in addressing forecast risks.

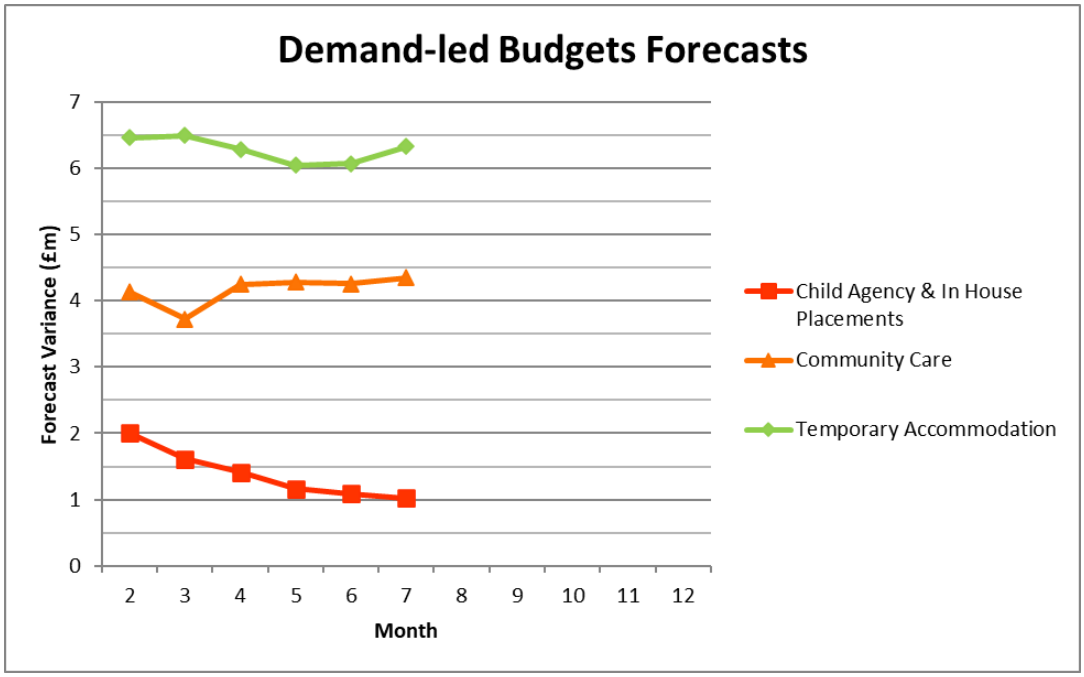


Demand-led Budgets

4.4 There are a number of budgets that carry potentially higher financial risks and therefore could have a material impact on the council's overall financial position. These are budgets of corporate significance where demand or activity is difficult to predict and where relatively small changes in demand can have significant implications for the council's budget strategy. These can include income related budgets. These therefore undergo more frequent and detailed analysis.

Forecast Variance Month 5 £'000	Demand-led Budget	TBM Budget Month 7 £'000	Forecast Outturn Month 7 £'000	Forecast Variance Month 7 £'000	Forecast Variance Month 7 %
1,166	Child Agency & In House Placements	28,718	29,736	1,018	3.5%
4,282	Community Care	80,706	85,058	4,352	5.4%
6,049	Temporary Accommodation	3,141	9,470	6,329	201.5%
11,497	Total Demand-led Budget	112,565	124,264	11,699	10.4%

The chart below shows the monthly forecast variances on the demand-led budgets for 2025/26.



TBM Focus Areas

4.5 There are clearly ongoing pressures across most areas of the council, particularly front-line, demand-led areas which is a clear indicator of the inflationary and demand pressures driven by current economic conditions. Key areas of pressures are outlined below:

4.6 **Children's Services:** The projected outturn position showed significant cost pressures: £0.272m on Home to School transport, In House Children's Disability Residential Provision £0.325m, PFI £0.215m and £1.018m on Children's Placements. This together with other underspends of £0.265m and a recovery plan of (£0.120m) result in a Month 7 overspend of £1.445m. Key drivers of the position are as follows:

- **Home to School Transport:** There are several factors contributing to the overspend in Home to School Transport. These include increased demand on the service (both at 5-16 ages, and 16 up until 19th birthday), increased numbers of children requiring single occupancy journeys, lack of local SEND school sufficiency, and increased numbers of routes required to accommodate individual post 16 learners' timetables. Market forces within SEND transport are also contributing to the overspend in Home to School Transport. The service is also increasingly impacted by local driver, vehicle passenger assistant, vehicle shortages and increased running costs. There is also a lack of competition in the transport market, particularly minibus providers, which is increasing contract prices still further. There is also increasingly less capacity in the local system to meet demand, not just in the numbers of children requiring transport but the nature of the transport requirements. There was also an increase in solo routes being created to educational provisions where they were the only children attending and using HTST.

- **Children's Placements:** The Children's Placements budget is facing significant challenges, driven by various factors affecting the cost and availability of suitable placements for children in care. In recent years,

there has been a noticeable rise in the number of children entering care with increasingly complex needs. This includes a small number of children with significant safeguarding risks requiring placements that offer specialised care and support at a very high cost. In addition, the prevailing market conditions have made the current framework contracts unattractive to providers and have resulted in the necessity to make more placements outside of the framework contract at higher rates.

Ongoing difficulties in recruiting foster carers have continued to cause sufficiency issues. The shortage of foster carers makes it problematic to place children in family settings, whether in-house or with external providers. This shortfall in available foster placements forces the service to select for more expensive care options. The number of children in Care remains relatively stable and the demand pressures are being managed through high quality social work intervention and the recently established Early Help service. However, the issues with very vulnerable children with complex needs coming into care, the local care provider market and fostering recruitment has led to substantial cost pressures on the placement budget.

- **Schools PFI:** The Schools' PFI (Private Finance Initiative) was set up in 2003 to improve the facilities at four schools within the city - Dorothy Stringer, COMART (now closed), Patcham High and Varndean – using private finance to fund the capital improvements. The scheme runs for 25 years and a Special Purpose Vehicle (a legal entity created to fulfil specific or temporary objectives) "Brighton & Hove City Schools Ltd" was set up as part of it. This is currently owned by SEMPERIAN. The scheme is funded partly by a DfE grant with schools paying an annual charge back to the council and partly via an annual drawdown of earmarked reserves. The annual charge is updated each March for the RPIX (RPI All Items Excluding Mortgage Interest) for the 12 months to February. Once the 25-year period is complete (~ 31st March 2028) the contract with SEMPERIAN ends and the assets will be transferred back to the council.

  It is forecast that by the end of the 2025/26 financial year the Schools' PFI contract will be overbudget by £0.215m. Despite receiving pressure funding to compensate for the reserve depletion in 23/24, it is not predicted to be sufficient to cover the higher-than-expected PFI contractor costs plus inflation. For prudency the forecasted inflation for 25/26 and beyond has been assumed in the model at 3%, despite the Office for Budget Responsibility forecasting that it will average out at 2% between 2024 and 2028.

  The PFI contract finishes on the 31st March 2028. There will be both risks and benefits involved in the completion of this contract. Ultimately it gives the Council ownership of the asset and all its associated costs but also the control of its budget. However, for this to be successful it will require the correct support from Property and the Procurement and Commissioning Teams.

Schools Budgets

At the end of the 2024/25 financial year there was a net deficit school balances position of £2.623m. This represents a worsening of the financial position of £2.904m when compared to the net surplus position of £0.281m at the end of 2023/24.

For 2025/26, there are 28 schools requiring Licensed Deficits totalling approximately £8.3m. After allowing for schools with surplus balances the overall net position based on 2025/26 school budget plans shows a net deficit of £6.8m. The latest position based on in-year school forecasts shows a slightly improved situation with a net deficit of £5.6m predicted.

The current forecast for the 2025/26 central Dedicated Schools Grant is an in-year deficit of £1.783m. At the end of the 2024/25 there was an overspend on central DSG of £0.680m, meaning the cumulative overall deficit position at the end of 2025/26 is estimated to be £2.463m. The DSG position is described in more detail in Appendix 4 below.

Homes & Adults Social Care: The directorate faces significant challenges in 2025/26 in mitigating the risks arising from increasing demands in homelessness and adult social care, managing the unit costs in temporary accommodation and the care market, and delivering all of the saving plans for 2025/26. It is to be noted that this is after applying service pressure funding of £8.391m in 2025/26 which has been used to fund budget pressures resulting from the increased unit costs and complexity. Despite the hard work to fully achieve the planned savings, the increase in demand and complexity is exceeding the forecast used for the budget setting. The TBM Month 5 (September) report to Cabinet included a number of strategic financial recovery plans for Temporary Accommodation and Homelessness, which are currently being put in place or explored further with future reports planned to be presented to Cabinet at future.

2025/26 savings plan for the directorate totals £9.256m, in addition to this, pressure mitigations of £5.025m were also applied to 2025/26 service pressure funding allocated corporately. There are continued actions focussing on attempting to manage demand for, and costs of services/accommodation across Homes and Adult Social Care and making the most efficient use of available funds.

Adult Social Care

The total financial recovery plan for Adult Social Care totals £8.860m, with £6.470m achieved to date and £2.061m reported at risk. The Adult social care and commissioning departments continue to implement a strengths-based approach across key work streams in adult social care, ensuring robust pathways are in place, developing a community reablement offer and re-designing the front door service. Currently the Health & Social Care system is under considerable pressure, and this is generating additional costs for the council due to:

- Pressures on the system due to short-term grant monies and an unresolved national, long-term funding solution;
- Significant pressures on the acute hospital resulting in increased costs to support timely discharge into residential, nursing and home care;

- Increased complexity particularly in relation to working age adults and the associated costs of service delivery.
- Continued workforce capacity challenges across adult social care services.
- Increasing demand due to changes in funding arrangements including clients no longer being eligible for Continuing Healthcare.

The funding of all care packages is scrutinised for Value for Money, ensuring that eligible needs are met in the most cost-effective manner which will not always meet people's aspirations. Established safeguards are in place to provide assurance within this process.

In respect of financial recovery and the ongoing management of Community Care Budget pressures, a monthly savings and efficiencies meeting provides rigorous monitoring and oversight of the Adult Social Care & Health savings progress. Additionally, each month the top ten spends on placements and packages of care are reviewed to ensure immediate remedial action is undertaken to look at options and, wherever possible, reduce the cost of care whilst meeting assessed need.

Temporary Accommodation (TA):

The total financial recovery plan target for Temporary Accommodation is £5.421m, with £3.176m achieved to date and £1.415m being reported at risk. The current overspend is due to increased demand for temporary accommodation along with a rise in rental costs. A Temporary Accommodation (TA) Reduction Plan has been developed, setting out a range of activities to either reduce the number of households entering TA; assist households to move on from TA, or reduce the cost of the TA we are using. As a broad overview, these actions can be categorised as Prevention, Move-On's to sustainable accommodation, cost reduction measures, and increasing income through improved collection and reducing void turnaround times. The overspend relates to the following elements:

- Nightly accommodation (spot purchased) was budgeted for an average of 193 households per night for the year. However, the forecast assumes that the average units per night will be 600. The service aims to reduce the average nightly cost wherever possible, but greater demand, increased costs, and the continuous decline of Temporary Accommodation leased properties pose significant challenges. Consequently, this budget has been overspent by £4.982m. The service is implementing additional measures to reduce the number of households accommodated as part of the financial recovery plan and future budget strategy.
- Block Booked - The service is facing significant pressures on the overall costs of Block Booked accommodation. The budget is set at 317 units per night during 2025/26, but due to increased demand, the forecast assumes 457 units. Additionally, the council is experiencing substantial increases in contract prices, resulting in an overspend of £0.989m.
- Private Sector Leased TA is overspent by £0.758m. Despite lower numbers of leased properties being used for TA as landlords withdraw their properties from the rental market, the new leases are also

commanding a higher rate and shorter terms. This is part of the reason for the increased numbers of Block Booked accommodation.

- Staffing costs were £0.400m underspend due to significant vacancies and recruitment challenges.

4.7 **City Operations:** This is diverse directorate delivering a broad range of services across the city and council. Its financial performance is closely tied to public and visitor activity, which introduces volatility in monthly forecasts.

The directorate manages substantial income budgets for parking, planning, and venues each sensitive to fluctuations in visitor numbers, commercial activity, and the wider economy. For 2025/26, City Operations faces challenging in-year savings targets, primarily focused on service redesigns and income generation. Of the £1.782m planned savings, £1.388m is either achieved or expected to be achieved, leaving £0.394m at risk. Key risks relate to income generation in Parking Services and City Parks, service redesigns, and efficiency measures such as the review of Multi-Functional Devices across the council.

As of Month 7, the directorate is forecasting a net underspend of £1.793m showing no movement compared to Month 5. Significant work has been undertaken between Month 5 and Month 7 to mitigate pressures identified. The forecast includes increased costs for essential highway maintenance and backlog clearance, offset by staffing underspends a result of the vacancy controls in place, improved income forecasts in sports & leisure, building control, and planning fees. A review of Direct Revenue Funding (DRF) of the capital programme following the 2024/25 outturn has released additional revenue resources, further strengthening the in-year position. While this has increased the council's borrowing requirement, the revenue cost-benefit justified the decision.

In response to the council's financial position, Financial Recovery Plans (FRPs) have been introduced for overspending areas. These include boosting Print & Sign income from Month 5 through increased service visibility, further enhancement of green waste income (currently outperforming budget).

Income trends require ongoing scrutiny, with seasonal adjustments necessary to reflect historic patterns particularly for summer-sensitive areas like parking. Early-year data should be treated cautiously, as complete monthly figures are typically delayed by two to three weeks. While current trends are positive, volatility remains a risk. Financial recovery actions will continue to be explored to mitigate potential income pressures, combining income-boosting initiatives with cost-reduction strategies.

4.8 **Central Hub:** There is a forecast overspend of £0.388m, representing an improvement of £0.965m compared to Month 5. This improvement incorporates the estimated financial recovery measures.

The primary driver of the overspend is a £1.705m pressure within Estate Management. Key factors include £0.525m from lost rental income due to the decanting of New England House, void costs (including NNDR), and fire safety waking watch. Additional pressures of £0.220m on the agricultural estate and £0.065m at Bartholomew House, where rental income targets have not yet been met. However, leasing of the 3rd and 4th floors has delivered savings by transferring operating costs to tenants. Further

pressures include £0.152m at Phoenix House (voids and rent-free periods) and £0.118m at Hove Technology Centre.

Other significant pressures include a £0.750m forecast overspend within Welfare, Revenues & Business Support (WRBS), driven mainly by Staffing pressures of £0.500m, including £0.200m to clear the council tax backlog. Procurement costs for HR systems (MHR iTrent), including the Datamart module, totalling £0.305m.

These pressures are partially offset by two main forecast underspends amounting to £0.751m. There is an underspend of £0.457m within People and Innovation, mainly vacancy savings and pausing non-statutory improvement work in Innovation (£0.141m), plus savings in Human Resources (£0.170m) and Health & Safety (£0.159m). The second element is an underspend of £0.294m within Governance and Law, primarily from overachievement of income (Local Land Charges and Registrars) and staffing savings.

Further Financial Recovery Measures (FRM) totalling £1.360m have been identified, including:

- £0.500m expected contract recovery costs
- £0.600m redistributed funds following the closure of the Coast to Capital LEP
- £0.260m savings in planned maintenance within Property Management.

These FRMs, previously reported separately, are now incorporated into the service forecasts from which they are expected to be achieved.

4.9 **Centrally-held Budgets:** There is a forecast underspend of £0.496m. Within this an overspend of £0.803m relates to the additional cost of the 2025/26 pay award above the amount provided in the budget.

There is a forecast pressure of £0.915m on Housing benefit Subsidy. The main element of this is a pressure of £1.081m on a certain benefit type for vulnerable tenants which is not fully subsidised. The costs in this area have continued to rise since last year. A post has been created which will have the remit of investigating this pressure with the intention of maximising subsidy received. This pressure is partially offset by a surplus of £0.187m on the net position of the recovery of overpayments.

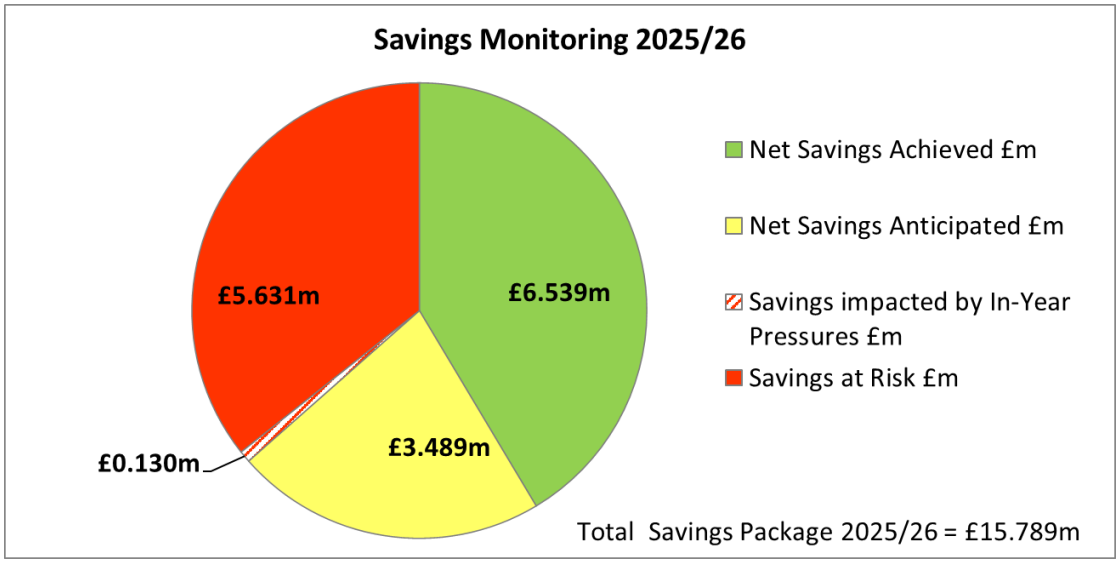
The corporate saving in relation to functional alignment activities from 2024/25 is also held in this area. At present £0.974m of this is at risk, which is included in the forecast.

These pressures are offset by a £3.260m underspend in Financing Costs, primarily as a result of previous year slippage and reprofile of the capital programme the capital programme review has reduced the in-year borrowing need resulting in an underspend in the current financial year. In addition, the council continues to maximise its internal reserves to meet is capital financing requirement, which while limiting investment returns, will delay the need to externally borrow during a time of elevated borrowing rates and reduce in year borrowing costs.

Monitoring Savings

4.10 The savings package approved by full Council to support the revenue budget position in 2025/26 was £15.789m following directly on from a £23.627m savings package in 2024/25 and makes 15 years of substantial savings packages totalling over £248m since government grant reductions commenced in 2010, and which have been necessary to enable cost and demand increases to be funded alongside managing the reductions in central government grant funding.

4.11 Appendix 4 provides a summary of savings in each directorate and indicates in total what has been achieved, what has been offset by in-year pressures and the net position of unachieved savings. Appendix 5 summarises the position across all directorates and presents the entire savings programme. The graph below provides a summary of the position as at Month 7 and shows that gross savings of £10.158m have been achieved or are anticipated but that inflationary pressures (exceptional price increases) have reduced these by £0.130m. Including other unachievable savings of £5.631m, a total of £5.761 (36%) of savings is forecast to be unachieved in 2025/26.



Housing Revenue Account Performance (Appendix 4)

4.12 The Housing Revenue Account (HRA) is a separate ring-fenced account which covers income and expenditure related to the management and operation of the council's housing stock – and the majority of funding is from the rent and service charges paid by tenants and leaseholders. The forecast outturn is an overspend of £1.216m, this position includes variances within specific service areas, details of which are provided in the Revenue Budget Performance Appendix. Any overspend in the HRA will result in a contribution from general reserves at year end (as at Month 7 the general reserves balance is £7.7m – equivalent to approximately 10% of income from rent and service charges).

HRA Risks

4.13 The HRA continues to face significant uncertainty regarding the financial position. There are major risks that need to be addressed and monitored to

ensure that the position remains stable. These risks include but are not limited to:

- Volume of Health & Safety compliance
- Delays related to Building Safety compliance
- Disrepair claims
- Rent arrears and collection rate

4.14 The HRA will continue to review spend to try to improve the current financial position. Any variations will be reported to future Cabinet meetings. Officers are part of the London Directors of Housing Group and will endeavour to work with peers as well as working with the Housing leads in the LGA, to explore how central government can support social landlords in investing in safety and quality improvements whilst also seeking to increase supply.

5 Dedicated Schools Grant Performance (Appendix 4)

5.1 The Dedicated Schools Grant (DSG) is a ring-fenced grant within the General Fund which can only be used to fund expenditure on the Schools' Budget. The Schools Budget includes elements for a range of services provided on an authority-wide basis including Early Years education provided by the Private, Voluntary and Independent (PVI) sector, and the Individual Schools Budget (ISB) which is divided into a budget share for each maintained school. The forecast outturn is currently an overspend of £2.463m and more details are provided in Appendix 4. Under the Schools Finance Regulations any underspend or overspend must be carried forward within the Schools' Budget in future years.

6 Capital Programme Performance and Changes

6.1 The table below provides a summary of capital programme performance by Directorate and shows that there is an overall underspend of £10.963m which is detailed in Appendix 6.

Forecast Variance Month 5 £'000	Directorate	Reported Budget Month 7 £'000	Forecast Outturn Month 7 £'000	Forecast Variance Month 7 £'000	Forecast Variance Month 7 %
(42)	Families, Children & Wellbeing	22,048	22,006	(42)	-0.2%
0	Homes & Adult Social Care	11,029	11,029	0	0.0%
0	City Operations	82,666	82,666	0	0.0%
0	Central Hub	21,481	21,481	0	0.0%
(5,859)	Homes & Adult Social Care - HRA	107,345	96,424	(10,921)	-10.2%
(5,901)	Total Capital	244,569	233,606	(10,963)	-4.5%

(Note: Summary may include minor rounding differences to Appendix 6)

6.2 Appendix 6 shows the changes to the 2025/26 capital budget. Cabinet's approval for these changes is required under the council's Financial Regulations. The following table shows the movement in the capital budget since approval at Month 5.

Summary of Capital Budget Movement	Reported Budget Month 7 £'000
Budget approved at Month 5	241,994
Changes reported at other committees and already approved, to be included for Month 7	13,998
New schemes to be approved in this report (see Appendix 7)	2,261
Variations to budget (to be approved)	1,994
Reprofiling of budget (to be approved)	(15,636)
Slippage (to be approved)	(42)
Total Capital	244,569

6.3 Appendix 6 also details any slippage into next year. Project managers have forecast that only £0.042m of the capital budget will slip into the next financial year, however, this will be reviewed again for Month 9.

7 Implications for the Medium-Term Financial Strategy (MTFS)

7.1 The council's MTFS sets out resource assumptions and projections over a longer term. It is periodically updated including a major annual update which is included in the annual revenue budget report to full Council. This section highlights any potential implications for the current MTFS arising from the 2025/26 financial year and details any changes to financial risks together with any impact on associated risk provisions, reserves and contingencies. Details of Capital Receipts and Collection Fund performance are also given below because of their potential impact on future resources.

Capital Receipts Performance

7.2 Capital receipts are used to support the capital programme. Any changes to the level of receipts during the year will impact on future years' capital programmes and may impact on the level of future investment for corporate funds and projects such as the Strategic Investment Fund, Innovations fund, Asset Management Fund and the Information, Technology and Digital Investment Fund. The planned profile of gross capital receipts for 2025/26, as at Month 7, is £19.535m which includes receipts expected for a major industrial lease extension at Moulsecoomb and Patcham Court Farm. There are also a number of residential and commercial properties identified for disposal as reported within the Residential Property Strategy report and Commercial Investment Property Strategy report to committee in December 2023 as well as the disposals approved by Cabinet on 27 June 2024, 24 April 2025 and 16 October 2025. To date there have been receipts of £1.460m in relation to the sale of properties at Grand Parade Mews, New Dorset St, East Brighton Park, Oxford St and Pickers Hill as well as some minor lease extensions and loan repayments. A further £5.5m was received in early November in respect of the Freshfield Estate. The capital receipts performance will be monitored over the remainder of the year against capital commitments.

7.3 The forecast for the 'right to buy sales' in 2025/26 is that an estimated 78 homes will be sold for approximately £12.000m. This step increase in sales is

because the discount provided for Right to Buy (RTB) reduced in November 2024 and there was an increased level of applications leading up to that deadline. Receipts from RTB sales are expected to reduce significantly in future years. The net retained receipt is used to fund investment in the HRA capital programme, specifically the new supply of affordable housing. As at the end of October, 43 homes were sold for a total receipt of £7.368m.

Collection Fund Performance

7.4 The Collection Fund is a separate account for transactions in relation to council tax and business rates. Any deficit or surplus forecast on the collection fund relating to council tax is distributed between the council, Sussex Police & Crime Commissioner and East Sussex Fire Authority, whereas any forecast deficit or surplus relating to business rates is shared between the council, East Sussex Fire Authority and the government.

7.5 The collection fund for council tax is forecast to be in deficit by £1.413m at year end, an increase of £0.142m from TBM Month 5. The primary driver is a forecast 0.5% reduction in council tax income collection (+£1.184m). There are other areas of variances on discounts, premiums and exemptions which broadly cancel each other out. The forecast includes a reduced level of banding increases compared to previous years, which may be affected by the backlog within the council tax service as well as VOA reporting issue from new systems. The council tax service is experiencing a high level of backlog due to system issues which continues to add further complexity in forecasting the underlying position. The council's share of the deficit is £1.195m and will be included as a one-off shortfall to be funded as part of the 2026/27 budget.

7.6 The collection fund for business rates is forecasting an overall deficit position of £2.320m (£1.910m brought forward and £0.410m in-year), a decrease of £1.712m from TBM Month 5. The primary reason for the decrease in the deficit is a higher than anticipated level of backdated new assessments added to the ratings list since TBM Month 5. This has been able to partially offset the increased cost of appeals previously reported. The cost of successful appeals is the primary reason for the overall deficit in both the bought forward and in year position. Successful appeals for both the 2017 list and 2023 list have both been above the level allowed within the budget. Whilst the 2017 list has just 3 outstanding appeals as at the end of August (which provides a high level of certainty over the potential cost), it is more complex to forecast the impact of the 2023 outstanding appeals list whilst appeals continue to be received. An additional £1.750m has been assumed for further successful appeals on the 2023 list, which is in line with successful appeals to date. There have been other offsetting changes, including a reduction in the level of small business rates relief awarded and an increase in empty property reliefs awarded. The council's share of the deficit position, after allowing for section 31 compensation grants and contributions from the collection fund section 31 adjustment reserve, is £0.569m (a decrease of £0.834m from TBM5) and will need to be funded as part of the 2026/27 budget.

Reserves, Budget Transfers and Commitments

7.7 The creation or re-designation of reserves, the approval of budget transfers (virements) of over £1.000m, and agreement to new financial commitments of corporate financial significance require Cabinet approval in accordance with

the council's Financial Regulations and Standard Financial Procedures. There are no items requiring approval at this stage.

7.8 The level of reserves held is kept under review and the table below shows the usable General Fund Reserves as at 31st March 2024 and 2025 as well as the estimated balances as at 31st March 2026. It is imperative that the current overspend forecast is addressed by the actions outlined paragraph 3.6. Failure to sufficiently do so will risk having to draw down most of the General Fund working balance, which currently stands at £8.965m following the planned contribution to reserves of £1.125m during 2025/26.

	Balance as at 31st March 2024 £'000	**Balance as at 31st March 2025 £'000**	**Estimated Balance as at 31st March 2026 £'000***
General Fund Working Balance	5,624	7,840	8,965
Held in Working balance for specific future commitments	2,579	411	175
PFI Reserves	8,601	9,671	7,208
Grants Carried forward	6,152	2,574	0
Schools LMS Reserves	282	-2,623	-5,600
Other Usable Reserves	7,926	10,163	6,642
Total General Fund Usable Reserves	**31,164**	**28,036**	**17,390**

(*) The estimated balances as at 31st March 2026 are not directly comparable as figures for grants carried forward and departmental carry forwards are unknown and assumed as zero at this stage. The figures for these at 31st March 2025 were £2.574m and £1.709m (within Other Usable Reserves) respectively.

7.9 A review of the level of reserves has been undertaken as part of the actions agreed in the Month 5 report (paragraph 3.6). This has identified balances of £1.041m that can be released to a new General Risk Reserve as part of supporting the 2026/27 budget. This is shown in more detail in the 2026/27 budget setting report elsewhere on this agenda.

8 Treasury Management Mid Year Review

8.1 The 2025/26 Treasury Management Strategy, including the Annual Investment Strategy was approved by full Council on 27 February 2025.

8.2 The CIPFA Treasury Management Code requires the performance of treasury management activity against the strategy and key prudential and treasury indicators to be reported at least twice a year. This includes a mid-year treasury management report which is reported to Cabinet as part of the TBM process. Appendix 8 provides a mid-year review of treasury management activity for the first half of 2025/26, measured against benchmarks and the key indicators in the council's Treasury Management Strategy.

8.3 The key treasury management activities undertaken in the period include:

- New PWLB borrowing of £20.000m was undertaken in April 2025 at a rate of 4.17% for a term of two years to support the councils' HRA under

borrowing position and to take advantage of a temporary reduction in borrowing rates.

- New short-term borrowing of £15.000m was undertaken at the end of September 2025 to fund temporary reductions in liquid cash.
- The highest risk indicator during the period was 0.002% which is below the maximum benchmark of 0.050%.
- The return on investments has exceeded the target benchmark rate in the first 6 months of 2025/26 by 0.16%
- The two borrowing limits approved by full Council have not been exceeded.
- The Annual Investment Strategy parameters have been met throughout the 6-month period.

9 Analysis and consideration of alternative options

9.1 The forecast outturn on General Fund budgets is an overspend of £7.776m. Any overspend at year-end would either need to be carried forward or potentially met from available one-off resources.

10 Community engagement and consultation

10.1 No specific consultation has been undertaken in relation to this report.

11 Financial implications

11.1 The financial implications are covered in the main body of the report. Financial performance is kept under review on a monthly basis by the Corporate Leadership Team and Cabinet and the management and treatment of strategic financial risks is considered by the Audit, Standards & General Purposes Committee.

Finance Officer consulted: Jeff Coates Date: 20/11/2025

12 Legal implications

12.1 Decisions taken in relation to the budget must enable the council to observe its legal duty to achieve best value by securing continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness. The council must also comply with its general fiduciary duties to its Council Tax payers by acting with financial prudence, and bear in mind the reserve powers of the Secretary of State under the Local Government Act 1999 to limit Council Tax & precepts.

Lawyer consulted: Elizabeth Culbert Date: 28/11/2025

13 Equalities implications

13.1 There are no direct equalities implications arising from this report.

14 Sustainability implications

14.1 Although there are no direct sustainability implications arising from this report, the council's financial position is an important aspect of its ability to meet Corporate Plan and Medium-Term Financial Strategy priorities. The achievement of a break-even position or better is therefore important in the

context of ensuring that there are no adverse impacts on future financial years from performance in 2025/26.

15 Health and Wellbeing Implications:

15.1 The council's budget includes many statutory and preventative services aimed at supporting vulnerable children and adults. The budget prioritises support to these core and critical services including management of any emerging in-year pressures to minimise impacts on statutory provision.

16 Conclusion and comments of the Chief Finance Officer (Section 151 Officer)

16.1 The forecast overspend risk of £7.776m at Month 7 represents 2.8% of the net General Fund budget. This forecast indicates a number of demand and cost pressures across homelessness and Adult Social Care as well as a number of income pressures across City Operations. There is evidence of the continuing impacts of demand pressures on social care and in particular temporary accommodation which are coming in above budget assumptions. These are also impacting the achievement of some savings programmes. The projected overspend set out in this report is unsustainable for the Council given the low level of reserves. Corrective action will have to be successful over the coming months if the Council is going to be able to balance its in-year budget and set a balanced budget for 2026/27.

16.2 As set out earlier in the report, understanding the level of forecast risk is important to inform decision-making and recovery actions. Given the scale of the projected overspend, urgent work is being undertaken by all Directorate Leadership Teams to develop recovery plans, alongside a cross Council Savings Delivery Board, which is focusing on the most significant areas of financial pressure across the organisation. It is imperative that plans to reduce spend in areas of high demand, particular temporary accommodation, are given significant organisational attention over the coming months.

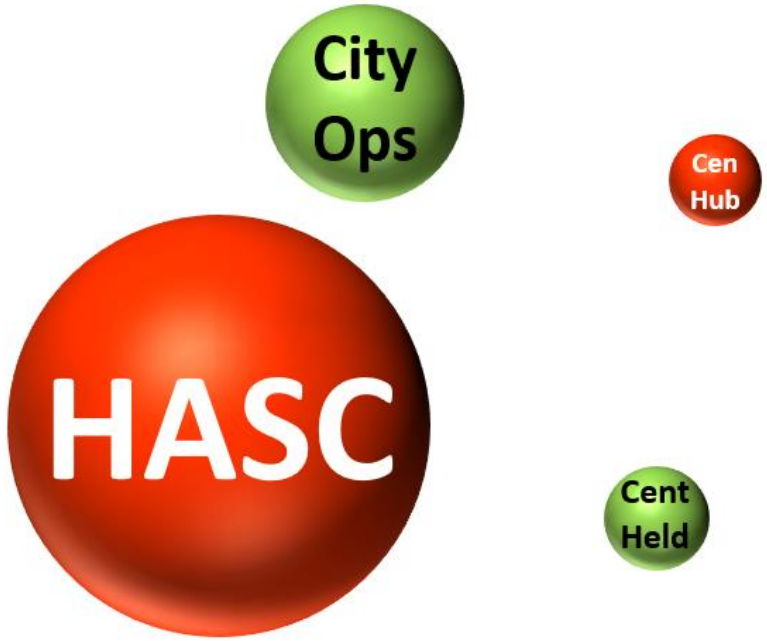
16.3 Enhanced vacancy management and spending control processes have been put in place across the council to contribute to in-year financial management and the option remains to tighten these further if monthly TBM reports do not continue to indicate a downward trajectory of the forecast risk.

Supporting Documentation

Appendices

1. Financial Dashboard Summary
2. Revenue Budget Movement since Month 5
3. Revenue Budget Performance RAG Rating
4. Revenue Budget Performance
5. Summary of 2025/26 Savings Progress
6. Capital Programme Performance
7. New Capital Schemes
8. Treasury Management Update

Appendix 1 - Financial Dashboard Summary

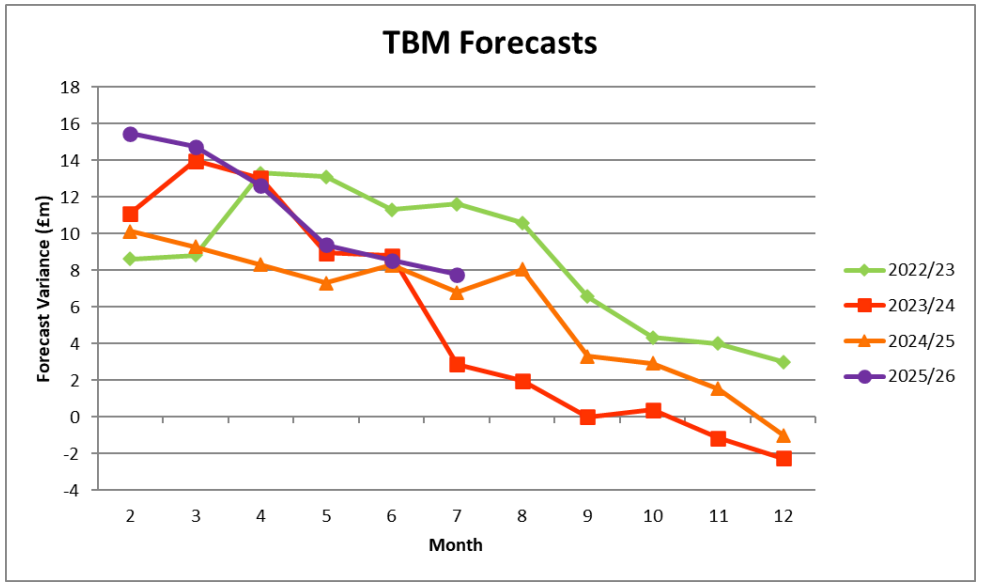


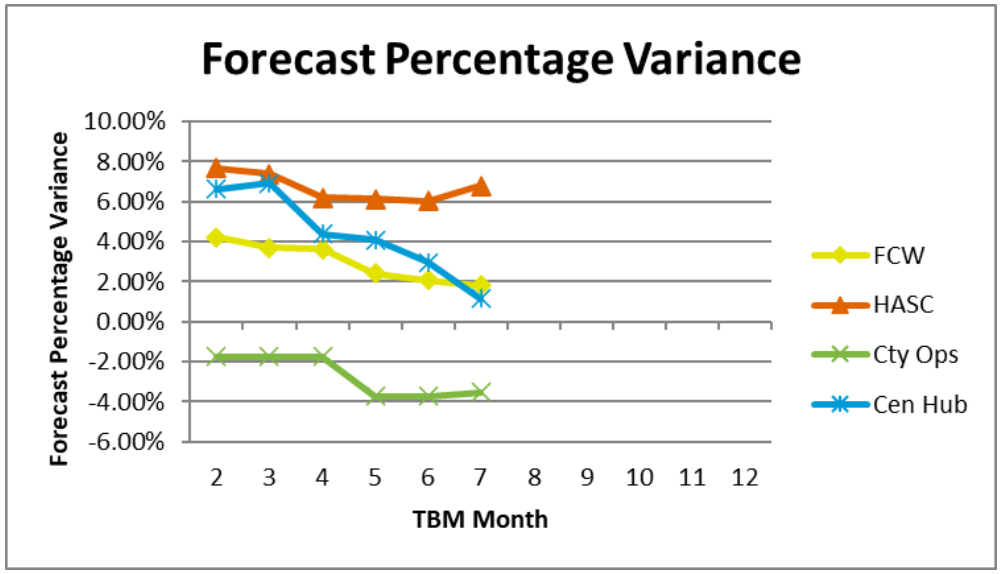
Red = overspent.
Green = Underspent.
Size of bubble indicates scale of under or overspend.
If a directorate is not shown then a break even position is forecast.

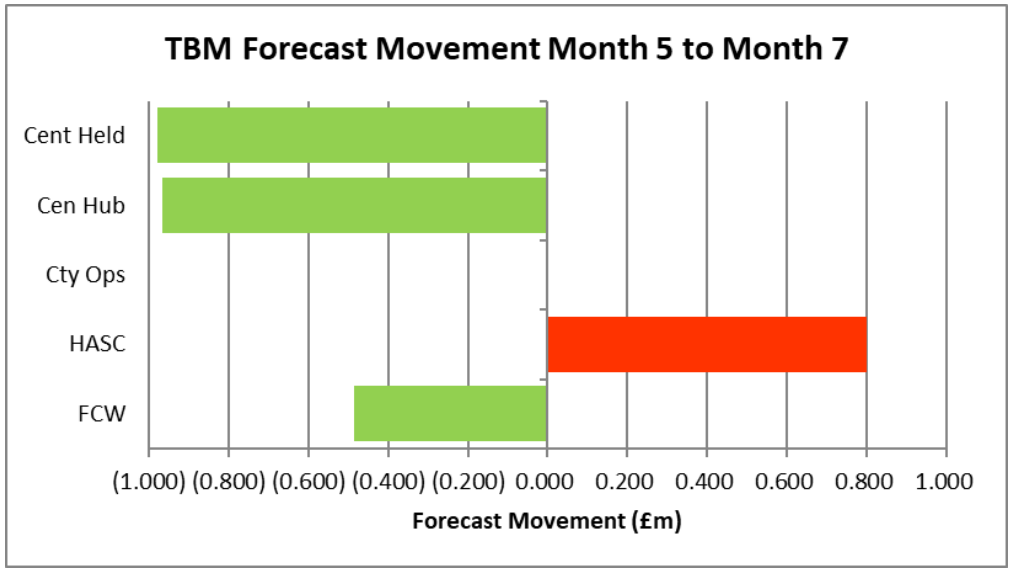
Direction of Travel

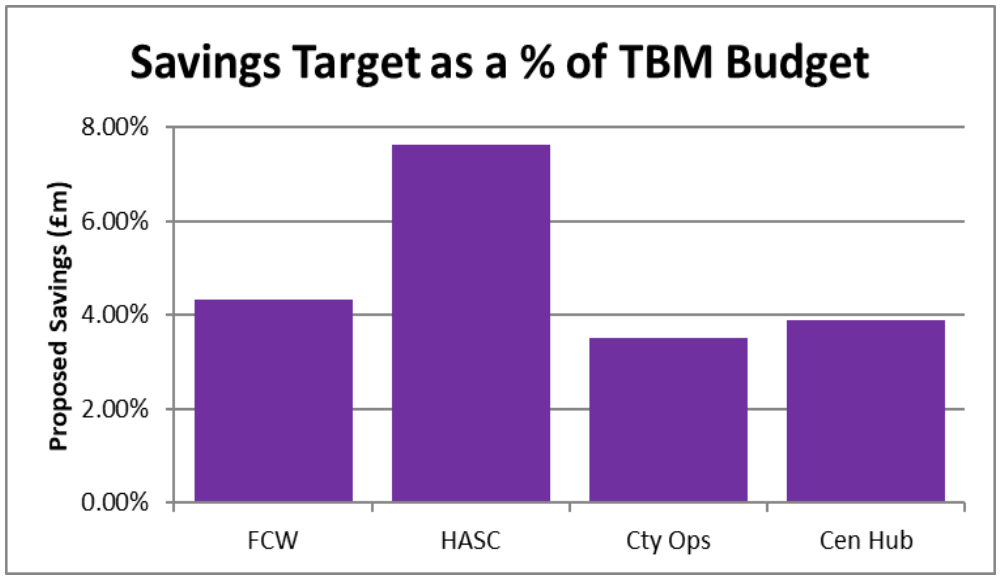
Directorate/Fund	Forecast Variance Month 7	Forecast Variance Month 7	Change From Month 5	RAG Rating Month 7
	£'000	%		
General Fund Services:				
Families, Children & Wellbeing	1,445	1.8%	↑	Red
Homes & Adult Social Care	8,232	6.8%	↓	Red
City Operations	(1,793)	-3.5%	=	Green
Central Hub	388	1.2%	↑	Red
Centrally-held Budgets	(496)	-5.6%	↑	Green
Total General Fund	7,776	2.8%	↑	Red
Dedicated Schools Grant (DSG)	2,463	362.2%	↑	Red
Housing Revenue Account	1,216	0.0%	↓	Red

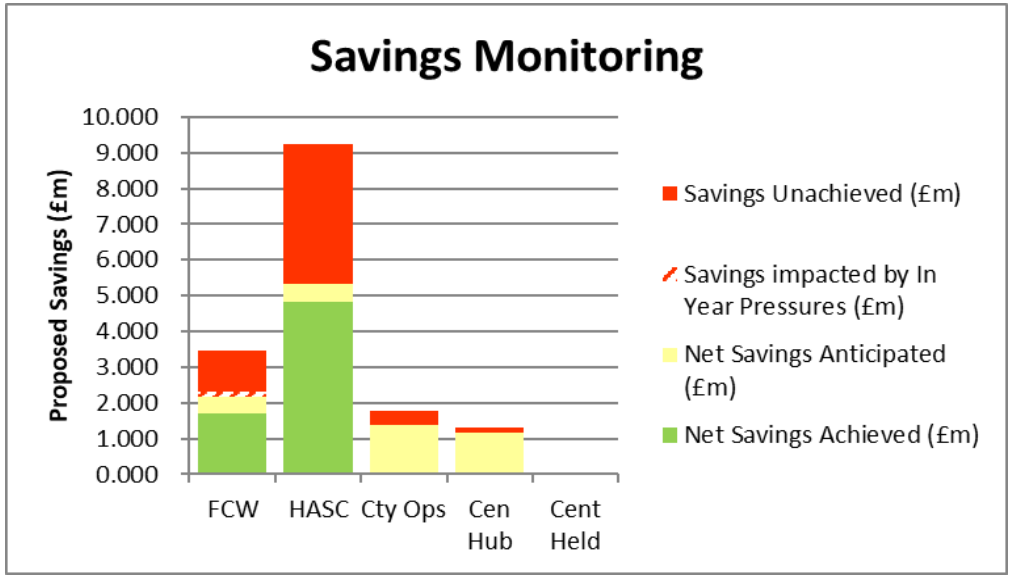
↑ = Improving position, ↓ = Worsening position




Forecast Percentage Variance
Forecast Percentage Variance
10.00%
8.00%
6.00%
4.00%
2.00%
0.00%
-2.00%
-4.00%
-6.00%
2 3 4 5 6 7 8 9 10 11 12
TBM Month
FCW
HASC
Cty Ops
Cen Hub


TBM Forecast Movement Month 5 to Month 7
Cent Held
Cen Hub
Cty Ops
HASC
FCW
(1.000) (0.800) (0.600) (0.400) (0.200) 0.000 0.200 0.400 0.600 0.800 1.000
Forecast Movement (£m)


Savings Target as a % of TBM Budget
Proposed Savings (£m)
8.00%
6.00%
4.00%
2.00%
0.00%
FCW
HASC
Cty Ops
Cen Hub


Savings Monitoring
Proposed Savings (£m)
10.000
9.000
8.000
7.000
6.000
5.000
4.000
3.000
2.000
1.000
0.000
FCW
HASC
Cty Ops
Cen Hub
Cent Held
Savings Unachieved (£m)
Savings impacted by In Year Pressures (£m)
Net Savings Anticipated (£m)
Net Savings Achieved (£m)

Appendix 2 – Revenue Budget Movement Since Month 5

Service	Forecast Variance Month 5 £'000	Forecast Variance Month 7 £'000	Movement £'000	Explanation of Main Movements
Commissioning & Communities	570	425	(145)	Home to school pupil number increase in September has been less than anticipated.
Education & Learning	370	168	(202)	Use of one-off Public Health Funding.
Family Help & Protection	1,311	972	(339)	Use of one-off Public Health Funding and success of FRP measures.
Public Health	0	0	0	
Further Financial Recovery Measures	(320)	(120)	200	See above
Total Families, Children & Wellbeing	1,931	1,445	(486)	
Adult Social Care	4,293	4,004	(289)	Utilised various grant funding for Adult Social Care
Integrated Commissioning	42	158	116	Unfunded rent and management charges at Wellington Road.
Housing People Services	6,135	5,238	(897)	Due to efficiencies and additional funding received from MHCLG.
Homes & Investment	(10)	(9)	1	Minor movement.
Further Financial Recovery Measures	(3,029)	(1,159)	1,870	Financial Recovery measures updated and savings achieved are reflected above
Total Homes & Adult Social Care	7,431	8,232	801	
City Infrastructure	(2,014)	(2,271)	(257)	Minor improvements in parking income forecast. Improvements from review of the work and costs related to repairs to the City's network of £0.203m offset by s278 pressures of £0.180m. Improvements in Road Works Permit and Traffic Management incomes of £0.166m.
Environment & Culture	287	(77)	(364)	Improved income forecasts for the Brighton Centre of £0.042m. Improvements in Bereavement fees of £0.084m and improvements in staffing forecast of £0.97m reflecting net vacancies and recruitments. £0.131m improvement in City Parks from forecast surplus Preston Parks parking income released plus revised staffing forecasts. £0.095m improvement in Sport & Leisure from further Leisure management incomes. Offset by £0.080m movement in Seafront Services from revised forecasts for Hove Beach

Service	Forecast Variance Month 5 £'000	Forecast Variance Month 7 £'000	Movement £'000	Explanation of Main Movements
				Park where year 1 incomes do not fully cover revenue expenditure of £0.048m due to rent free periods and additional responsive repairs required for seafront of £0.032m.
Environmental Services	411	549	138	£0.264m improvement in forecast for use of Agency Staff for service delivery as the service continues to stabilise. £0.160m additional costs due to late billing required for night security costs for the ongoing threat to the depot. £0.060m additional temporary staffing costs for temporary additional capacity to reduce vehicle defects for which staff have converted to permanent contracts within the establishment. £0.050m pressure from unachievable income target of selling fleet services to external customers. £0.050m reduction in forecast enforcement incomes due to fewer people choosing to pay enforcement fines and insufficient service and legal capacity to chase large non-payers.
Place	198	726	528	Adverse movement relates to costs associated with legal claims offset in part improved income and forecast staffing costs for the year.
Digital Innovation	(525)	(570)	(45)	Minor improvements due to a staffing forecast review.
Further Financial Recovery Measures	(150)	(150)	0	
Total City Operations	(1,793)	(1,793)	0	
Cabinet Office	(169)	(227)	(58)	Review of expenditure at Month 7 resulting in adjustment of forecast. Underspend mainly driven by staffing savings and underspends in subscriptions to organisations.
Corporate Leadership Office	84	37	(47)	Improvement following a further review of operations and staffing forecast at Month 7
Finance & Property	3,372	1,248	(2,124)	Movement mainly from presentation change, with further recovery plans now included in individual services as well

Appendix 2 – Revenue Budget Movement Since Month 5

Service	Forecast Variance Month 5 £'000	Forecast Variance Month 7 £'000	Movement £'000	Explanation of Main Movements
				as an improvement in savings and income in Building and Surveyors portfolio.
Governance & Law	(429)	(294)	135	Change mainly the result of a change in presentation. One off litigation income from Truck Cartel that was previously reported here is now reported under Finance.
People & Innovation	(72)	(444)	(372)	Combination of forecast income generation and improvement in staffing savings as a result of holding vacancies in services in the directorate.
Contribution to Orbis	67	68	1	Minor movement
Further Financial Recovery Measures	(1,500)	0	1,500	Further Recovery Plans now reported in individual services from which they are expected to be achieved.
Total Central Hub	1,353	388	(965)	
Bulk Insurance Premia	195	195	0	
Capital Financing Costs	(2,215)	(3,260)	(1,045)	A combination of the Capital Programme Review reducing the in-year borrowing need and an increase in anticipated investment returns due to improved cash flow forecasts.
Levies & Precepts	0	0	0	
Unallocated Contingency & Risk Provisions	0	0	0	
Unringfenced Grants	0	0	0	
Housing Benefit Subsidy	915	915	0	
Other Corporate Items	1,589	1,654	65	£0.071m pressure as Public health contribution to General Fund services now reflected in FCW forecasts. Partially offset by £0.006m improvement in national Insurance saving relating to AVC contributions.
Total Centrally-held Budgets	484	(496)	(980)	
Total General Fund	9,406	7,776	(1,630)	

Appendix 3 – Revenue Budget RAG Ratings

RAG Rating Key:	RAG for Service Areas	RAG for Directorates[1]	RAG for General Fund
Red	Forecast overspend of 5% or more or £0.100m whichever is lower	Forecast overspend of 5% or more or £0.250m whichever is lower	Forecast overspend of 0.5% or more or £1.000m whichever is lower
Amber	Forecast overspend of less than 5% of budget or £0.100m, whichever is lower.	Forecast overspend of less than 5% of budget or £0.250m, whichever is lower.	Forecast overspend of less than 0.5% of budget or £1.000m, whichever is lower.
Green	Breakeven or forecast underspend	Breakeven or forecast underspend	Breakeven or forecast underspend

Service	TBM Budget Month 7 £'000	Forecast Variance Month 7 £'000	Forecast Variance Month 7 %	RAG Rating Month 7
Commissioning & Communities	18,763	425	2.3%	Red
Education & Learning	6,633	148	2.2%	Red
Family Help & Protection	52,919	872	1.6%	Red
Public Health	1,459	0	0.0%	Green
Total Families, Children & Wellbeing	79,774	1,445	1.8%	Red
Adult Social Care	106,625	3,675	3.4%	Red
Commissioning & Partnerships	5,530	158	2.9%	Red
Housing People Services	8,305	4,408	53.1%	Red
Homes & Investment	913	(9)	-1.0%	Green
Total Homes & Adult Social Care	121,373	8,232	6.8%	Red
City Infrastructure	(3,039)	(2,371)	-78.0%	Green
Environment & Culture	8,695	(77)	-0.9%	Green
Environmental Services	33,149	499	1.5%	Red
Place	3,164	726	22.9%	Red
Digital Innovation	8,833	(570)	-6.5%	Green
Total City Operations	50,802	(1,793)	-3.5%	Green
Cabinet Office	1,571	(227)	-14.4%	Green
Corporate Leadership Office	967	37	3.8%	Amber
Finance & Property	7,314	1,248	17.1%	Red
Governance & Law	5,078	(294)	-5.8%	Green
People & Innovation	15,353	(444)	-2.9%	Green
Contribution to Orbis	2,924	68	2.3%	Amber
Directorate wide	0	0	0.0%	Green
Total Central Hub	33,207	388	1.2%	Red
Sub Total	285,156	8,272	2.9%	
Bulk Insurance Premia	4,348	195	4.5%	Red
Capital Financing Costs	12,628	(3,260)	-25.8%	Green
Levies & Precepts	249	0	0.0%	Green
Unallocated Contingency & Risk Provisions	2,091	0	0.0%	Green
Unringfenced Grants	(28,726)	0	0.0%	Green
Housing Benefit Subsidy	699	915	130.9%	Red
Other Corporate Items	(86)	1,654	1923.3%	Red
Total Centrally-held Budgets	(8,797)	(496)	-5.6%	Green
Total General Fund	276,359	7,776	2.8%	Red

Appendix 3 – Revenue Budget RAG Ratings

Service	TBM Budget Month 7 £'000	Forecast Variance Month 7 £'000	Forecast Variance Month 7 %	RAG Rating Month 7
Repairs & Maintenance	19,256	30	0.2%	Amber
Tenancy Services	16,241	(227)	-1.4%	Green
Housing Management & Support	6,666	(149)	-2.2%	Green
Housing Investment & Asset Management	3,371	1,928	57.2%	Red
Housing Strategy & Supply	2,110	(124)	-5.9%	Green
Council-owned Temporary Accommodation	1,071	375	35.0%	Red
Rent & Service Charges	(76,979)	(382)	-0.5%	Green
Capital Financing Costs	11,580	0	0.0%	Green
Direct Revenue Funding	16,684	(235)	-1.4%	Green
Total Housing Revenue Account	0	1,216	0.0%	Red

Individual Schools Budget (ISB)	143,150	0	0.0%	Green
Early Years Block (inc delegated to Schools)	39,705	(523)	-1.3%	Green
High Needs Block (exc delegated to Schools)	41,294	2,261	5.5%	Red
Exceptions and Growth Fund	3,663	45	1.2%	Amber
Grant Income	(228,492)	680	0.3%	Red
Total Dedicated Schools Grant (DSG)	(680)	2,463	362.2%	Red

([1]) In the above tables the Dedicated Schools Grant and Housing Revenue Account are treated as Directorates for the purposes of RAG rating.

Families, Children & Wellbeing (FCW)

Revenue Budget Summary

Forecast Variance Month 5 £'000	Service	TBM Budget Month 7 £'000	Forecast Outturn Month 7 £'000	Forecast Variance Month 7 £'000	Forecast Variance Month 7 %	2025/26 Savings Proposed £'000	Net Savings Achieved £'000	Net Savings At Risk £'000
570	Commissioning & Communities	18,763	19,188	425	2.3%	783	672	111
370	Education & Learning	6,633	6,801	168	2.5%	112	27	20
1,311	Family Help & Protection	52,919	53,891	972	1.8%	1,563	10	1,158
0	Public Health	1,459	1,459	0	0.0%	1,002	1,002	0
2,251	Total Families, Children & Wellbeing	79,774	81,339	1,565	2.0%	3,460	1,711	1,289
(320)	Further Financial Recovery Measures (see below)	-	(120)	(120)	-	-	-	-
1,931	Residual Risk After Financial Recovery Measures	79,774	81,219	1,445	1.8%	3,460	1,711	1,289

Explanation of Key Variances *(Note: FTE/WTE = Full/Whole Time Equivalent)*

Key Variances £'000	Service Area	Variance or Financial Recovery Measure Description
Further Directorate Financial Recovery Measures		
(100)	Agency placements	Ongoing management of high cost placement demand and cost pressures
(20)	Education Strategy	Potential for additional funding from S106 to part fund Senior School Organisational Officer
Commissioning & Communities		
272	Home to School Transport	Based on data held on Mobisoft the forecast overspend for Home to School Transport is £0.272m. This forecast takes account of the updated current contracted routes as at September. There are several factors contributing to the overspend in Home to School Transport. These included increased demand on the service (both at 5-16 ages, and 16 up until 19th birthday), increased numbers of children requiring single occupancy journeys, lack of local SEND school sufficiency, and increased numbers of routes required to accommodate individual post 16 learners' timetables.

Key Variances £'000	Service Area	Variance or Financial Recovery Measure Description
160	Libraries	The budget shows a net overspend of £0.160m across all cost centres and is mainly linked to additional staffing costs because of delay in savings achievement, the regrading of library officers and relief officers from scale 4a to 4b, CCTV costs for Libraries Extra and additional one-off costs following the transfer of customer services desks.
(7)	Other	Minor variances.
Education & Learning		
215	Schools PFI	The Schools' PFI (Private Finance Initiative) was set up in 2003 to improve the facilities at four schools within the city - Dorothy Stringer, COMART (now closed), Patcham High and Varndean – using private finance to fund the capital improvements. The scheme runs for 25 years and a Special Purpose Vehicle (a legal entity created to fulfil specific or temporary objectives) "Brighton & Hove City Schools Ltd" was set up as part of it. This is currently owned by SEMPERIAN. The scheme is funded partly by a DfE grant with schools paying an annual charge back to the council and partly via an annual drawdown of earmarked reserves. The annual charge is updated each March for the RPIX (RPI All Items Excluding Mortgage Interest) for the 12 months to February. Once the 25-year period is complete (~ 31st March 2028) the contract with SEMPERIAN ends and the assets will be transferred back to the council. It is forecast that by the end of the 2025/26 financial year the Schools' PFI contract will be overbudget by £0.215m. Despite receiving pressure funding to compensate for the reserves depletion in 23/24, it is not predicted to be sufficient to cover the higher than expected PFI contractor costs plus inflation. For prudency the forecast inflation for 25/26 and beyond has been assumed in the model at 3%, despite the Office for Budget Responsibility forecasting that it will average out at 2% between 2024 and 2028.
250	School Closure Site Costs	Site costs of school buildings following school closures
(100)	Council Nurseries	Potential underspend due to increased income for free entitlement funding
(206)	School Based Counselling	Use of one-off Public Health funding
9	Other	Minor variances.
Family Help & Protection		
1,018	Demand-Led - Children's placements	The overspend is the result of a relatively small number of children with extremely high cost placements due to their complex needs and requirement for specialised care. In addition, the prevailing market conditions have made the current framework contracts unattractive to providers and have resulted in the necessity to make more placements outside of the

Key Variances £'000	Service Area	Variance or Financial Recovery Measure Description
		framework contract at higher rates. A further compounding factor is the ongoing difficulty in recruiting foster carers. The shortage of foster carers makes it problematic to place children in family settings, whether in-house or with external providers, forcing the need for more expensive care options.
317	Family Support for children with disabilities	The Overspend is due to the known weekly costs for the children receiving support to prevent entry to care.
(215)	Preventive (Section 17)	Ongoing scrutiny and control of spending to ensure the most efficient and effective use of the Section 17 budget has resulted in an anticipated underspend across all the pods of £0.215m
(100)	Use of Public health funding	Use of Public Health underspend to fund the CiC mental health contract
(48)	Other	Minor variances.

Homes & Adult Social Care (HASC)

Revenue Budget Summary

Forecast Variance Month 5 £'000	Service	TBM Budget Month 7 £'000	Forecast Outturn Month 7 £'000	Forecast Variance Month 7 £'000	Forecast Variance Month 7 %	2025/26 Savings Proposed £'000	Net Savings Achieved £'000	Net Savings At Risk £'000
4,293	Adult Social Care	106,625	110,629	4,004	3.8%	6,581	4,362	1,961
42	Commissioning & Partnerships	5,530	5,688	158	2.9%	155	155	0
6,135	Housing People Services	8,305	13,543	5,238	63.1%	2,520	1,891	300
(10)	Homes & Investment	913	904	(9)	-1.0%	0	0	0
10,460	Total Homes & Adult Social Care	121,373	130,764	9,391	7.7%	9,256	6,408	2,261
(3,029)	Further Financial Recovery Measures (see below)	-	(1,159)	(1,159)	-	-	-	-
7,431	Residual Risk After Financial Recovery Measures	121,373	129,605	8,232	6.8%	9,256	6,408	2,261

Explanation of Key Variances

Key Variances £'000	Service Area	Variance or Financial Recovery Measure Description
Further Directorate Financial Recovery Measures		
(329)	Adult Social Care	The directorate has developed a Financial Recovery Plan to address the above pressures. The total target is £8.859m. £6.470m has been achieved with a further £0.329m to be achieved as at Month 7 while £2.061m is at risk. The savings include the following:
		- Targeted Reviews
		- Staffing Vacancies
		- Limited fee uplifts
		- Review of some in-house services
(830)	Temporary accommodation (TA)	The service has introduced a Financial Recovery Plan to manage in-year budget pressures. Key savings measures include: • improving the turnaround time of void PSL and Seaside properties to minimise losses

Key Variances £'000	Service Area	Variance or Financial Recovery Measure Description
		• restructuring the current staffing resources, • temporarily using Large Panel System (LPS) blocks as cost-effective accommodation in place of more expensive spot-purchased options. • In addition, renegotiating Block Booked (BB) contracts and expanding BB stock aim to further reduce reliance on spot purchasing.
Adult Social Care		
2,674	Physical & Sensory Support	The number of clients for Physical and Sensory Support started the year at 2,072 has increased to 2,177 at Month 7. The average weekly unit cost was budgeted at £230pwk for Under 65s and £154pwk for Over 65s. The Month 7 position shows an increase to £245pwk & £191pwk respectively. (Month 6 £249pwk & £187pwk) The budgeted unit costs of Substance misuse is £716pwk and the forecast is currently £508pwk (Month 6 £474 pwk) Overall overspend relates to increase in demand and cost in Direct Payments & Short Term Residential costs for under 65s partly offset by reductions in Supported Living, Long Term Nursing Care and Long Term Residential Care. Home, Short Term Residential and Nursing care for over 65s is partially offset by a reduction in Long Term Residential care.
(434)	Assessment & SIT	Overall underspend relates to vacancies. Increased income related to Financial Assessments & interest. Overtime forecast reduced in Month 7
175	Resource Centres Older People	The overall overspend relates to reduced client income and a refocus for some beds at Ireland Lodge on reablement. Higher overtime and sessional workers forecasts, and decreased S117 income forecast at Month 7
(291)	In House Community Reablement	Overall underspend relates to vacancies and delayed recruitment. Month 7 reflects a reduced overtime forecast as some posts filled
(661)	Adult LD Community Care	The number of clients for Adult LD started the year at 1,069 and has increased to 1,121 for Month 7. The average weekly unit cost is budgeted at £603pwk and is currently forecast at £773pwk at Month 7 (£781pwk at Month 6).

Key Variances £'000	Service Area	Variance or Financial Recovery Measure Description
		Overall underspend is in Supported Living, Respite Residential Care and Direct Payments offset by an increases in Long Term Residential care.
229	In -House Adults LD Provision	Overall overspend relates to Agency, Overtime and Sessional workers covering vacancies, sickness and leave particularly Beach House and Beaconsfield Villas. This has been further reduced for Month 7
(86)	Learning Disabilities Assessment Teams	Overall underspend relates to vacances being recruited to.
2,203	Community Care - Mental Health, & Memory & Cognition	The number of clients for Mental Health and Memory and Cognition started the year at 882 and has risen to 950 at Month 7. The average weekly unit cost was budgeted at £267pwk for Mental health increasing to £336 pwk for Month 7 (£340 for Month 6) and from £427pwk to £522pwk for Month 6 (£518pwk for Month 6) for Memory & Cognition. Overall overspend relates to increased costs of Supported Living and Community Support Services in Mental Health Primary Support. There is also a shift of Nursing Care where Mental Health has increased and Memory & Cognition decreased. Income has increased due to increase in S117 clients and costs increasing the 50% share to be recharged.
136	Adult Mental Health Staffing	Overall overspend relates to the expected SPFT staffing recharges to be above budget. Month 7 reduction relates to reduced overtime
59	Other	Minor variances.
Commissioning & Partnerships		
(11)	Commissioning ASC	Unfunded posts & unfunded software costs have been offset by vacancies.
169	Contracts	Overspend includes £0.114m for unfunded rent and management charge at Wellington Road & forecast overspend on the Carers Support budget offset in part by Better Care Fund (BCF) risk share
Housing People Services		
6,329	Temporary accommodation (TA)	The Temporary Accommodation (TA) budget was exceeded by £6.329m.

Key Variances £'000	Service Area	Variance or Financial Recovery Measure Description
		Weekly TA reduction meetings have driven positive initiatives to reduce costs, improve service delivery, and enhance outcomes for clients. As a result, between 1 April and 31 October 2025, homelessness was successfully prevented for 313 households, a significant accomplishment in a challenging environment. Despite these successes, accommodation costs remain under pressure due to persistent high demand. Nightly accommodation was budgeted for 193 households per night, but the current forecast is 600 households, resulting in a budget overspend of £4.982m. Similarly, demand for block booked accommodation increased from a budgeted 317 units to 457 units per night, leading to an overspend of £0.989m. Private Sector Leased overspent by £0.758m, largely due to the successful renegotiation of leases. While these new leases are at higher rates, they remain more cost effective and stable than alternatives, such as hotel accommodation. Staffing costs were £0.400m under budget, reflecting significant vacancies and ongoing recruitment challenges. Moving forward, the service will continue to seek innovative solutions to manage demand and expenditure, including ongoing engagement with landlords and regular review of accommodation strategies.
(1,051)	Commissioned Rough Sleeper and Housing related Support Services	Underspend due to additional funding received and efficiencies within the service.
62	Homemove	The overspend is due additional cost and loss of income whilst implementing a new system.
(107)	Housing Options	The primary reason for the underspend is staff vacancies in the service.
5	Travellers	The slight overspend is mainly from higher-than-budgeted security costs, partly offset by efficiencies elsewhere.

Key Variances £'000	Service Area	Variance or Financial Recovery Measure Description
0	Seaside Homes	This budget is forecast to break-even.
Homes & Investment		
(9)	Housing Strategy and Enabling	Underspend is due mainly to lower than budgeted salary costs
(0)	Private Sector Housing	This budget is forecast to break-even.

City Operations

Revenue Budget Summary

Forecast Variance Month 5 £'000	Service	TBM Budget Month 7 £'000	Forecast Outturn Month 7 £'000	Forecast Variance Month 7 £'000	Forecast Variance Month 7 %	2025/26 Savings Proposed £'000	Net Savings Achieved £'000	Net Savings At Risk £'000
(2,014)	City Infrastructure	(3,039)	(5,310)	(2,271)	-74.7%	588	367	221
287	Environment & Culture	8,695	8,618	(77)	-0.9%	388	295	93
411	Environmental Services	33,149	33,698	549	1.7%	303	303	0
198	Place	3,164	3,890	726	22.9%	393	393	0
(525)	Digital Innovation	8,833	8,263	(570)	-6.5%	110	30	80
(1,643)	Total City Operations	50,802	49,159	(1,643)	-3.2%	1,782	1,388	394
(150)	Further Financial Recovery Measures (see below)	-	(150)	(150)	-	-	-	-
(1,793)	Residual Risk After Financial Recovery Measures	50,802	49,009	(1,793)	-3.5%	1,782	1,388	394

Explanation of Key Variances

Key Variances £'000	Service Area	Variance or Financial Recovery Measure Description
Further Directorate Financial Recovery Measures		
(50)	Commercial Waste	Marketing revenue generating programmes including Garden Waste and Graffiti removal
(100)	Print & Sign	Recovery of Print & Sign income by advertising the service and encouraging services to make use of the internal offering instead of entering contracts with external bodies.
City Infrastructure		
(1,614)	Parking Services	Parking Services are forecasting a net surplus of £1.614m against a budgeted net income of £27.216m. This includes a projected surplus of £0.874m, driven by On-Street Paid Parking exceeding its income target by £0.264m, although Permit Income is expected to fall short by £0.067m. Off-Street Parking is forecast to underperform by £0.990m, largely due to a £0.779m shortfall from barrier car parks, particularly at London Road and Regency and a £0.191m pressure from leased car parks, which is being addressed. These

Key Variances £'000	Service Area	Variance or Financial Recovery Measure Description
		pressures are partially offset by a £0.085m surplus in PCN Income, supported by increased ticket issuance and historic debt recovery, though higher contract costs are also noted. Additionally, a further surplus of £0.827m is anticipated from savings in unsupported borrowing and staffing efficiencies. A risk reserve of £0.730m has been included in line with the new PCN cash model.
37	Concessionary Bus Fares	Minor overspend.
331	Network Management	There are surpluses in streetlighting of £0.143m and traffic enforcement of £0.240m, which help offset pressures in the Road Works Permits scheme of £0.184m and Section 278 development assessments of £0.200m. The primary financial pressure lies in Highway Maintenance of £0.331m, where repair activity ceased in February 2025 to meet last year's budget controls. This pause has resulted in a growing backlog of safety defects, now valued at £0.259m as of Month 7. The current pressure reflects the funding required to address this backlog and prevent further escalation.
(925)	Transport Projects and Engineering	Main surplus is £0.900m in Public Transport as a result of Bus Service Improvement Plan (BSIP) funding received allowing management of costs. Bikeshare are reporting a £0.176m pressure against unsupported borrowing which is offset in part by other smaller surpluses.
(100)	Regulatory Services	Surpluses as a result of staffing vacancies within current structure. Regulatory services are going through a restructure consultation, the results of which are a projected in year underspend.
Environment & Culture		
(188)	Venues and Events	Forecast surplus incomes to the Brighton Centre £0.253m. Offset by pressures on income targets for outdoor events of £0.064m.
(41)	Seafront Services	Surplus Seafront incomes and vacancies held.
501	Museum and Culture	Pressure relating to the NJC arrangements with the Royal Pavilion Museums Trust under a contractual obligation.
340	Bereavement	Income pressure in Bereavement services mostly related to forecast cremations
(534)	Sport and Leisure	Underspends from surplus Leisure Management Fee incomes, switch for capital programme funding from Direct Revenue Funding to borrowing and Golf Course contracts.
(155)	City Parks	£0.300m pressure relating to tree disease control and basal root clearance. Offset by vacancies within wider city parks and surpluses from Parks parking.

Key Variances £'000	Service Area	Variance or Financial Recovery Measure Description
Environmental Services		
(1,426)	Environmental Services	£1.098m underspend due to vacancy controls within Collections service and Street Cleansing. £0.414m surpluses in commercial and green waste collections due to increased customers.
2,427	Fleet & Maintenance	Overspend on Refuse/Recycling collection vehicle hire of £0.696m in addition to ongoing maintenance charges and other vehicle costs in keeping an ageing fleet operational. Pressure of £0.306m for ensuring Hollingdean Depot remains operational due to the state of the site. Forecasts of essential PPE to ensure service operates showing £0.271m overspend, though it is anticipated this will reduce during the year. Capital financing costs for fleet procurement is £0.440m overspent and is caused by vehicle renewals in recent years and the additional costs from the transition to electric vehicles. An action plan has been developed to take longer term actions to address spend in this area and deliver a more resilient service for residents.
(452)	Strategy and Service Improvement	Underspends as a result of held vacancies and spending controls. Further underspends of £0.295m resulting from difficult to fill vacancies in maintaining public conveniences
Place		
120	Director of City Operations	Overspend relating to prior year corporate savings yet to be allocated.
361	Development Planning	Underachievement of Building Control incomes due to uncertainty in the development and finance markets, whilst Planning application incomes are currently forecast to overachieve budgets. Also, anticipated legal fee and consultants overspends relating to Business As Usual activities greater than budget. Biodiversity Net Gain grant award offsetting costs as well as further offsets from staffing underspends from held vacancies and other supplies & services underspends as part of spending controls. These are offset by costs associated with legal claims.
129	Regeneration	Black Rock borrowing costs offset by rental incomes from the site
(51)	Net Zero	Minor underspends as a result of vacancies and spending controls
167	Architecture & Design	Reduced level of Architects' fees.
Digital Innovation		
(570)	Digital Innovation	At Month 7, Digital Innovation are forecasting an underspend of £0.570m which is an increase of £0.020m from Month 6. This increase in underspend is due to delays in recruiting to vacant posts. The overall estimated underspend for Digital Innovation is from salary and contracts budgets, in particular, telephony which is funded from capital for the

Key Variances £'000	Service Area	Variance or Financial Recovery Measure Description
		first year so creating an in-year saving. However, the service is also experiencing pressures on some contracts with inflationary increases and changes to licensing models. Vacancies are still having an impact on the service provision, particularly for the Traded Services team who have 5 vacant posts and are struggling to meet existing SLAs.

Central Hub

Revenue Budget Summary

Forecast Variance Month 5 £'000	Service	TBM Budget Month 7 £'000	Forecast Outturn Month 7 £'000	Forecast Variance Month 7 £'000	Forecast Variance Month 7 %	2025/26 Savings Proposed £'000	Net Savings Achieved £'000	Net Savings At Risk £'000
(169)	Cabinet Office	1,571	1,344	(227)	-14.4%	100	0	100
84	Corporate Leadership Office	967	1,004	37	3.8%	0	0	0
3,372	Finance & Property	7,314	8,562	1,248	17.1%	655	0	25
(429)	Governance & Law	5,078	4,784	(294)	-5.8%	132	0	12
(72)	People & Innovation	15,353	14,909	(444)	-2.9%	289	0	0
67	Contribution to Orbis	2,924	2,992	68	2.3%	115	0	0
2,853	Total Central Hub	33,207	33,595	388	1.2%	1,291	0	137
(1,500)	Further Financial Recovery Measures	-		0	-	-	-	-
1,353	Residual Risk After Financial Recovery Measures	33,207	33,595	388	1.2%	1,291	0	137

Explanation of Key Variances

Key Variances £'000	Service Area	Variance or Financial Recovery Measure Description
Cabinet Office		
(227)	Cabinet Office	This is mainly due to the forecast underspend of £0.103m for subscriptions for this year. The remaining underspend is a combination of reduced payroll costs and less expenditure forecast on goods & services due to spending controls currently in place.
Corporate Leadership Office		
37	CEO	The service is forecasting an overspend of £0.045m at Month 6, down from £0.085m at Month 6. The overspend is a combination of mandatory training costs and temporary staffing arrangements within Corporate Leadership following council wide restructuring in 2024/25.

Key Variances £'000	Service Area	Variance or Financial Recovery Measure Description
Finance & Property		
(274)	Finance	The underspend is a combination of expected income from services to external bodies of £0.203m, Redmond Review audit grant of £0.098m and £0.167m one off income from settlement of the class action on Truck Cartel, offset by overspends in staffing due to temporary staffing arrangements.
750	WRBS	The pressure is a combination of re-procurement of HR system iTrent with an added module for data analytics £0.305m, added to this is a declared staffing pressure of £0.500m which includes a forecast £0.200m agency spend for Council Tax, Housing Benefit and scanning and indexing backlog clearing, a £0.113m postage overspend as well as a decline in income from schools £0.059m.
1,705	Estates Management	A combination of lost rental incomes from the decanting of New England House, void costs including NNDR and fire safety waking watch amounting to £0.525m pressure. £0.221m pressure from Agricultural Estate. £0.065m income pressure on Bartholomew house where rental incomes are not meeting income targets yet, however leasing of 3rd and 4th floors has achieved savings where operating costs are with tenants. £0.080m pressure on Commercial Portfolio from voids and rent-free periods of new tenants. £0.152m pressure at Phoenix house due to voids and rent-free periods.
(891)	Building & Surveying	Mainly due to reprofiling of some works to capital and savings on planned maintenance and operational costs.
(42)	Education Property management	The service is forecasting a £0.020m underspend resulting from small savings and income across the service.
Governance & Law		
(95)	Legal Services	A combination of income generation, staffing and other small savings across the service. One-off litigation income of £0.167m which was previously reported under Legal has been transferred and now reported under Finance.
(13)	Elections, Registrars and Local Land Charges (LLC)	Electoral Services: small £0.003m underspend . LLC: £0.155m overachievement due to delayed transfer to His Majesty's Lad Registry (HMLR). Income forecast revised down by £0.022m due to a reduction in searches since July 2025. Coroner: £0.041m pressure. Shared service cost apportioning with WSCC renegotiated to reduce recharge by £0.101m. Mortuary: £0.059m pressure due to necessary staffing regularisation and increasing energy costs. Overspend reduced by expected income uplift from contract renegotiation.

Key Variances £'000	Service Area	Variance or Financial Recovery Measure Description
		Registration Services: £0.082m underspend driven by £0.040m income overachievement and £0.94m staffing underspend
(186)	Democratic Services	Democratic services are forecasting a £0.013m underspend at Month 7 resulting from small savings across the service. However, there is staffing budget pressure which the service is monitoring for which small savings within the service are forecast to mitigate the pressure in this financial period, a budget pressure bid has been submitted for future financial periods.
People & Innovation		
14	Strategic Communications	Overspend resulting from staffing pressure and licensing cost for Hootsuite and Vuelio of £0.041m offset by savings across the service
(142)	Innovation Services	Underspend from mainly vacancy savings and pausing all non-statutory improvement work at Month 7
(159)	Health & Safety, Wellbeing, Facilities & Building Services	This underspend is a result of mitigations in the service mainly driven by forecast staffing spend savings from holding vacancies and income generation from corporate refuse collection and recycling contract £0.343m and a further £0.041m in corporate landlord facilities. This has also been historically mitigated by underspends elsewhere in the service, however the ungrouping of the service together with the increasing pressures on Facilities and Building Services output requirements, including corporate offices, helpdesk function for corporate landlord portfolio, contractor management, statutory compliance needs aging corporate portfolio and significant underspend relating to the corporate landlord portfolio, has resulted in the need to flag the budget pressure. A further indicative £0.112m staffing budget pressure relating to new essential roles in the service, the roles will be filled after the service redesign is complete as well as a £0.253m operational budget pressure on facilities and postal services due to increased demand for the service. In health, safety and wellbeing services, £0.130m budget pressure split as £0.054m pressure for Security/Safety assessments and related preventative works required for members and staff covering cost. A £0.076m pressure on operating budgeting for Health, Safety and Wellbeing for costs relating to ongoing regulatory costs, health, safety and wellbeing reset, training, assurance and compliance works including Fire Safety and Building Safety, and associated costs.

Key Variances £'000	Service Area	Variance or Financial Recovery Measure Description
		These overspends have been offset by income of £0.384m and other small underspends across the HSWFBS service
(138)	HR Policy and Initiatives	Human Resources is declaring an underspend of £0.138m at Month 7. The underspend is a combination of staffing savings and expected income from recruitment team.
(19)	Inclusion, Learning & Organisational Development	Inclusion, Learning & Organisational Development. is forecasting an underspend of £0.019m mainly due to the delay of Oliver McGowan roll-out, the training will only start in 2026/27
Contribution to Orbis		
68	Orbis Partnership	The overall partnership budget is forecast to be on target but due to the contribution ratios on different elements this equates to a small overspend of £0.005m for Brighton & Hove. Added to this is a shortfall of £0.063m in the overall contribution budget which results in a total forecast pressure of £0.068m at Month 7.

Centrally-held Budgets

Revenue Budget Summary

Forecast Variance Month 5 £'000	Service	TBM Budget Month 7 £'000	Forecast Outturn Month 7 £'000	Forecast Variance Month 7 £'000	Forecast Variance Month 7 %	2025/26 Savings Proposed £'000	Net Savings Achieved £'000	Net Savings At Risk £'000
195	Bulk Insurance Premia	4,348	4,543	195	4.5%	0	0	0
(2,215)	Capital Financing Costs	12,628	9,368	(3,260)	-25.8%	0	0	0
0	Levies & Precepts	249	249	0	0.0%	0	0	0
0	Unallocated Contingency & Risk Provisions	2,091	2,091	0	0.0%	0	0	0
0	Unringfenced Grants	(28,726)	(28,726)	0	0.0%	0	0	0
915	Housing Benefit Subsidy	699	1,614	915	130.9%	0	0	0
1,589	Other Corporate Items	(86)	1,568	1,654	1923.3%	0	0	0
484	Total Centrally-held Budgets	(8,797)	(9,293)	(496)	-5.6%	0	0	0

Explanation of Key Variances

Key Variances £'000	Service Area	Variance or Financial Recovery Measure Description
Bulk Insurance Premia		
195	Bulk Insurance Premia	The forecast for the settlement of insurance claims for the remainder of the year is higher than anticipated for 2025/26 due to several large value claims outstanding as at Month 7.
Capital Financing Costs		
(3,260)	Financing Costs	Previous year outturn and capital programme review at Month 7 has resulted in slippage and reprofile of the capital programme has reduced the in-year borrowing need resulting in an underspend in the current financial year. In addition, the council continues to maximise its internal reserves to meet is capital financing requirement, which while limiting investment returns, will delay the need to externally borrow during a time of elevated borrowing rates and reduce in year borrowing costs.
Housing Benefit Subsidy		
915	Housing Benefit Subsidy	Based on the mid year estimate submitted to DWP there is now an estimated pressure of £0.915m. The main element of this is a pressure of £1.081m on a certain benefit type for

Key Variances £'000	Service Area	Variance or Financial Recovery Measure Description
		vulnerable tenants which is not fully subsidised. The costs in this area have continued to rise since last year. A post has been created which will have the remit of investigating this pressure with the intention of maximising subsidy received. This pressure is partially offset by a surplus of £0.187m on the net position of the recovery of overpayments.
Other Corporate Items		
803	2025/26 Pay Award	Estimated additional cost of 2025/26 pay award above amount provided for in budget.
(289)	Corporate Pension Costs	An underspend of £0.177m on the unfunded pension costs budget. Of this, £0.085m relates to an overpayment in respect of 2024/25 and £0.092m is an in year underspend. Over achievement of £0.112m on National Insurance savings on AVC scheme.
974	Functional Alignment	At this stage £0.974m of the 2024/25 functional alignment saving is forecast to be at risk.
95	Other VFM Savings	Unachieved balance of savings from previous years.
71	Public Health contribution to General Fund services	Achievement of these savings is now reflected in FCW forecasts.

Housing Revenue Account (HRA)

Revenue Budget Summary

Forecast Variance Month 5 £'000	Service	TBM Budget Month 7 £'000	Forecast Outturn Month 7 £'000	Forecast Variance Month 7 £'000	Forecast Variance Month 7 %	2025/26 Savings Proposed £'000	Net Savings Achieved £'000	Net Savings At Risk £'000
(257)	Repairs & Maintenance	19,256	19,286	30	0.2%	(1,555)	(1,255)	300
(242)	Tenancy Services	16,241	16,014	(227)	-1.4%	(170)	(170)	0
(158)	Housing Management & Support	6,666	6,517	(149)	-2.2%	0	0	0
2,283	Housing Investment & Asset Management	3,371	5,299	1,928	57.2%	(184)	(184)	0
(24)	Housing Strategy & Supply	2,110	1,986	(124)	-5.9%	(145)	(145)	0
203	Council-owned Temporary Accommodation	1,071	1,446	375	35.0%	0	0	0
(379)	Rent & Service Charges	(76,979)	(77,361)	(382)	-0.5%	(164)	(164)	0
1,427	Service Area Total	(28,264)	(26,813)	1,451	5.1%	(2,218)	(1,918)	300
0	Capital Financing Costs	11,580	11,580	0	0.0%	0	0	0
(235)	Direct Revenue Funding	16,684	16,449	(235)	-1.4%	(250)	(250)	0
1,192	Total Housing Revenue Account	0	1,216	1,216	0.0%	(2,468)	(2,168)	300

Explanation of Key Variances

Key Variances £'000	Subjective Area	Variance Description
Repairs & Maintenance		
(992)	Employees	Increased capitalisation of salary costs, largely in respect of the Electrical Installation Condition Report (EICR) programme, plus forecast underspend against the net staffing budget because of vacancies across the service. The underspend equates to approximately 10% of the net salary budget.
1,414	Premises	Good progress continues to be made in clearing the backlog and the latest forecast assumes that this will be largely cleared by December. There is a forecast overspend against the “business as usual” budget, based on spend to date and the volume of repairs being undertaken.

Key Variances £'000	Subjective Area	Variance Description
1,613	Supplies and Services	The service continues to experience significant costs arising from disrepair claims. These by their very nature are difficult to forecast and will be closely monitored each month, this assumes that action is taken to manage the claims early in the process, enabling better management of spend.
(2,005)	Contribution from earmarked reserves	Allocation from earmarked reserves of £1.000m for disrepair claims as set aside in the 2025/26 budget and £1.005m to be allocated from the repairs backlog reserve to cover the latest estimated costs.
Tenancy Services		
168	Employees	There is a net forecast overspend forecast against staffing costs, which is mainly driven by additional resources required for fire safety.
(111)	Premises	There is a forecast underspend of approximately £0.200m against utility costs, based on information supplied by the Energy and Water team.
(338)	Supplies & Services	There is a one-off reduction in the planned contribution to the General Needs rent bad debt provision, following confirmation that the Leasehold bad debt provision is no longer required and will be transferred in-year.
54	Third Party Payments	Minor net variance.
Housing Management & Support		
(147)	Employees	There is a net underspend forecast against staffing costs, mainly as a result of revised costs compared to budget setting assumptions..
(2)	Premises	Minor net variance.
Housing Investment & Asset Management		
(64)	Employees	Minor net variance.
35	Premises	Minor net variance.
2,560	Supplies & Services	Enhanced building safety measures for a few of our blocks, with significant costs arising from a 24-hour security service to help manage items being taken into the building and to support with floor walks and maintaining clear egress and exits to the building.
(603)	Income	Increased income from leasehold service charges, compared to budget assumptions.
Housing Strategy & Supply		
(155)	Employees	Increased capitalisation of salaries, compared to budget assumptions
31	Supplies and Services	Minor net variance.
Council-owned Temporary Accommodation		
73	Employees	Minor net variance.

Key Variances £'000	Subjective Area	Variance Description
458	Premises	Council-owned Temporary Accommodation can by its nature be volatile. There is a significant overspend in respect of empty properties and repairs costs, based on spend incurred to date and reflecting additional costs in respect of void costs for Large Panel Systems (LPS) units.
(156)	Supplies and Services	There is a forecast underspend against the Transfer Incentive Scheme budget
Rent & Service Charges		
(382)	Rents & Service Charges	The income budget is approximately £77.000m for the financial year and at Month 7 there is a minor over-achievement of £0.382m (equating to 0.5%) based on the first seven months of data and assumptions made around level of voids and changes in number of properties across the year.
Direct Revenue Funding		
(235)	Depreciation	There is an anticipated underspend against the depreciation budget, based on latest assumptions.

Dedicated Schools Grant (DSG)

Revenue Budget Summary

Forecast Variance Month 5 £'000	Service	TBM Budget Month 7 £'000	Forecast Outturn Month 7 £'000	Forecast Variance Month 7 £'000	Forecast Variance Month 7 %
0	Individual Schools Budget (ISB)	143,150	143,150	0	0.0%
(24)	Early Years Block (excluding delegated to Schools) *(This includes Private Voluntary & Independent (PVI) Early Years 3 & 4 year old funding for the free entitlement to early years education)*	39,705	39,182	(523)	-1.3%
2,087	High Needs Block (excluding delegated to Schools)	41,294	43,555	2,261	5.5%
100	Exceptions and Central Services	3,663	3,708	45	1.2%
680	Grant Income	(228,492)	(227,812)	680	0.3%
2,843	Total Dedicated Schools Grant (DSG)	(680)	1,783	2,463	362.2%

Explanation of Key Variances

Key Variances £'000	Service Area	Variance Description
Early Years Block (including delegated to Schools)		
(38)	Central Early Years Block	Minor variance
(85)	Early Years Additional Support Funding	Over provision of budget for Additional Support Funding for Under 2s
(400)	Early Years Free Entitlement	Predicted underspends following autumn term early years census
High Needs Block (excluding delegated to Schools)		
895	Post-16 High Needs	There has been a significant increase in the number and cost of high needs learners accessing FE colleges and specialist post-19 provision in the last year and there has also been a movement of high needs learners moving into the city with responsibility for education falling to Brighton and Hove.
486	High needs pupils in other LA schools	There is an overspend in the budget relating to high needs pupils being educated in schools in other LAs. This is partly due to the lack of specialist provision within the city and

Key Variances £'000	Service Area	Variance Description
		has also been impacted by the closure of Homewood College last year, which has meant specialist Social Emotional Mental Health placements are now being made in schools/academies in other LAs.
825	Independent non maintained school agency placements	The Independent non-maintained school agency placements budget continues to be under pressure due to increasing demand, higher unit costs and a lack of suitable local provision.
125	Brighton and Hove Special School Placements	Current placements in the city's special schools for in excess of commissioned numbers.
(70)	Other	Other variances.
Exceptions and Growth Fund		
45	Other	Minor variances.
Grant Income		
680	DSG Grant	2024/25 central DSG overspend held in unusable reserve

Savings Monitoring 2025/26

Directorate	2025/26 Savings Proposed £'000	Gross Savings Achieved £'000	Gross Savings Anticipated £'000	In Year Pressures £'000	Net Savings At Risk £'000	Savings At Risk As A % Of Net Budget £'000
Families, Children & Wellbeing	3,460	1,841	460	(130)	1,289	1.6%
Homes & Adult Social Care	9,256	4,828	487	0	3,941	3.2%
City Operations	1,782	0	1,388	0	394	0.8%
Central Hub	1,291	0	1,154	0	137	0.4%
Centrally-held Budgets	0	0	0	0	0	0.0%
Total Directorate Savings	**15,789**	**6,669**	**3,489**	**(130)**	**5,761**	**2.1%**

Explanation and Mitigation of At Risk Savings

Directorate £'000	Savings at Risk £'000	Explanation and Mitigation Strategy
Families, Children & Wellbeing	1,289	The savings at risk predominantly relate to placements for children in care (£1.158m). This is the result of a relatively small number of children with extremely high cost placements due to their complex needs and requirements for specialised care. In addition, the prevailing market conditions have made the current framework contracts unattractive to providers and have resulted in the necessity to make more placements outside of the framework contract at higher rates. A further compounding factor is the ongoing difficulty in recruiting foster carers. The shortage of foster carers makes it problematic to place children in family settings, whether in-house or with external providers, forcing the need for more expensive care options.
Homes & Adult Social Care	3,941	Achieving savings remains challenging amid rising demand and ongoing cost pressures across the directorate. Since TBM5, a positive movement of £0.584m has been realised for housing savings at risk, despite continued difficulties in securing properties within the private rented sector. Key risks include the limited availability of affordable properties, landlords exiting the market, managing out-of-area placements, resident relocations, low vacancy rates, and ensuring landlord compliance. For Adult Social Care Month 7 shows an at risk figure of £2.061m which has increased due to negotiations with large care providers who have challenged the no fee uplift policy for 2025/2026 which will create an increase in costs of c£0.900m
City Operations	394	The majority of the savings at risk for City Operations primarily relate to income opportunities within Parking Services and City Parks and service redesigns across other service areas. The savings linked to income generation are dependent on the economy and as such will remain a risk for the foreseeable. A saving approved that related to the closure of Kings Road Paddling Pool has now been reversed, this will not be delivered instead will need to be mitigated through other means in the TBM process for City Operations. Where savings are not achievable the service will continue to mitigate through monthly TBM monitoring.
Central Hub	137	The savings at risk for Central Hub is primarily savings relating to VisitBrighton (£0.100m). Reduced promotion of B&H potentially resulting in fewer conferences and reduced incomes for VisitBrighton, hotels and venues which will offset the savings. The other elements relate to coroner and registration services where BHCC has submitted proposal to West Sussex County Council to reduce its recharge for the services as well as Estates Management for Slipper Baths, the risk relates to time delay and costs in disposal of the property
Centrally-held Budgets	0	
Total General Fund	**5,761**	

Families, Children & Wellbeing – Capital Budget Summary

Forecast Variance Month 5 £'000	Unit	Reported Budget Month 5 £'000	Reported at Other Committees £'000	New Schemes £'000	Variations, Slippages & Reprofiles £'000	Reported Budget Month 7 £'000	Forecast Outturn Month 7 £'000	Forecast Variance Month 7 £'000	Forecast Variance Month 7 %
0	Family Help and Protection	517	0	0	0	517	517	0	0.0%
0	Education and Learning	17,271	0	0	4,059	21,330	21,330	0	0.0%
(42)	Schools	186	0	0	0	186	144	(42)	-22.7%
0	Commissioning and Communities	15	0	0	0	15	15	0	0.0%
(42)	Total Families, Children & Wellbeing	17,989	0	0	4,059	22,048	22,006	(42)	-0.2%

Details of Variation requests and explanations of significant Forecast Variances, Slippage or Reprofiles are given below:

Detail Type	Amount £'000	Project	Description
Education and Learning			
Variation	4,055	High Needs Provision Capital	Grant received in August for 2025/26 of £1.967m. Further amendment to budget of £2.088m for grant received in 2022/23 and 2023/24 but the budget had been understated for those years. This variation brings the budget into line with the funding available.
Variation	4	Devolved Formula Capital	Variation to budget of less than £0.100m
Schools			
Variance	(42)	Cardinal Newman 4G Pitch & Changing Rooms	Variance of less than £0.100m

Homes & Adult Social Care (excluding Housing Revenue Account) – Capital Budget Summary

Forecast Variance Month 5 £'000	Unit	Reported Budget Month 5 £'000	Reported at Other Committees £'000	New Schemes £'000	Variations, Slippages & Reprofiles £'000	Reported Budget Month 7 £'000	Forecast Outturn Month 7 £'000	Forecast Variance Month 7 £'000	Forecast Variance Month 7 %
0	Adult Social Care	7,005	0	304	(350)	6,959	6,959	0	0.0%
0	Homes & Investment	3,068	0	0	0	3,068	3,068	0	0.0%
0	Housing People Services	1,002	0	0	0	1,002	1,002	0	0.0%
0	Total Homes & Adult Social Care	11,075	0	304	(350)	11,029	11,029	0	0.0%

Details of Variation requests and explanations of significant Forecast Variances, Slippage or Reprofiles are given below:

Detail Type	Amount £'000	Project	Description
Adult Social Care			
Reprofile	(350)	Knoll House Building Works	Reprofile of budget to next year for security and interior design during building prep £0.100m, and contingency of £0.250m.

City Operations – Capital Budget Summary

Forecast Variance Month 5 £'000	Unit	Reported Budget Month 5 £'000	Reported at Other Committees £'000	New Schemes £'000	Variations, Slippages & Reprofiles £'000	Reported Budget Month 7 £'000	Forecast Outturn Month 7 £'000	Forecast Variance Month 7 £'000	Forecast Variance Month 7 %
0	City Infrastructure	50,673	0	0	(6,310)	44,363	44,363	0	0.0%
0	Digital Innovation	5,162	0	0	(90)	5,072	5,072	0	0.0%
0	Environment and Culture	9,502	6,429	127	(1,999)	14,059	14,059	0	0.0%
0	Environmental Services	10,975	0	1,830	(3,072)	9,732	9,732	0	0.0%
0	Place	7,140	2,300	0	0	9,440	9,440	0	0.0%
0	Total City Operations	83,452	8,729	1,957	(11,472)	82,666	82,666	0	0.0%

Details of Variation requests and explanations of significant Forecast Variances, Slippage or Reprofiles are given below:

Detail Type	Amount £'000	Project	Description
City Infrastructure			
Reprofile	(5,000)	Active Travel A259	Construction for this project is expected to start next year 2026/27.
Reprofile	(1,453)	Seafront Heritage Lighting Renewal Programme	Pilot Phase of the scheme commenced in September, so unable to spend remaining budget in this FY. Budget has now been reprofiled over the next 2 years, better placing the team to improve on works and investigate more economical and efficient ways of working and address risk structures in a timely manner.
Reprofile	93	National Highways A27 Diversion Improvement	Reprofile of budget of less than £0.100m
Variation	4,372	Active Travel A259	Committing Active Travel Funds Tranche 3 and Tranche 4 into this project. Additional £0.075m reallocated from LTP grant to fund project.
Variation	(4,297)	Active Emergency Travel Fund - Tranche 3 and 4	Committing funds to Active Travel A259 as highlighted in the Informal cabinet presentation on the 30th October.
Variation	(220)	Integrated Transport Schemes (LTP)	Reallocation of budget to support Capitalised Project Management staff working on LTP funded projects.

Detail Type	Amount £'000	Project	Description
Variation	195	Various schemes	Variations to budget of less than £0.100m: (£0.035m) Traffic Signal Carbon Reduction Programme (£0.001m) Sustainability and Carbon Reduction Investment Fund Transport Projects (£0.001m) Preston Park Sustainable Drainage System (SuDS) £0.067m Middle Street SuDs in Schools £0.050m Valley Gardens Phase 3 (LTP) £0.050m Safer Road Fund Round 3 - A2010 Brighton £0.045m Elm Grove / Queens Park Road £0.015m Coldean Primary School Raingarden £0.005m A270 Wild Park Rainscape
Digital Innovation			
Reprofile	(140)	IT&D FIT Programme	This is required to provide PCI compliant solution for contact centres, but the options are currently under review.
Reprofile	(130)	IT&D Projects (DDaT Contingency)	This reprofile of budget is required to provide AI network monitoring (as approved at CLT), the options are currently under review as part of a larger cyber resilience review.
Reprofile	222	Laptop Refresh	Refresh project has drawn down £0.222m from 26/27 to complete the rollout of new Win11 laptops before the end of the support cut-off date in October 2025.
Slippage	(42)	Customer Digital Programme - Communications website	Slippage of budget less than £0.100m
Variation	0	Various schemes	Variations to budget of less than £0.100m: (£0.050m) IT&D FIT Programme (£0.010m) IT&D Data Programme £0.060m IT&D Projects DDat Contingency
Environment & Culture			
Reported at Other Committee	6,429	Withdean Sports Complex Swimming Pool	Reported to Cabinet on 17th July 2025

Detail Type	Amount £'000	Project	Description
Reprofile	(1,077)	Parks and Open Spaces Investment	Deferred spend on Pavilions to 2026/27 except for works at Wish Park, Stanmer Pavilion, Bear Road and Floral Clock. This project is related to the Pavilions and Mess Rooms Refurbishment Program. Budget has been reprofiled and reallocated onto separate projects to reflect expected works in future years.
Reprofile	(500)	Prince Regent Capital Works	Budget reprofiled because works are in scoping phase, and unlikely to begin in 2025/26.
Reprofile	(398)	Royal Pavilion Estate (Phase 1)	After the second contractor business collapsed, the team has focused on essential works and reprogramming tasks around building use, with some works agreed not to progress. A new pressure of £0.100m for legal and professional fees to secure a £1.5m bond has been identified but will be contained within the agreed budget. Reprofiling is required to manage delivery in line with BDBF's performance programmes so there is no major impact.
Reprofile	(280)	Seafront Railings Upgrade	Linked to the Community Infrastructure Levy (CIL) report with Planning to gain funding for Phase 1. Budget reprofiled to next year because it is a key priority for administration and the public.
Reprofile	(63)	Seafront Facilities Improvements	Reprofile of budget of less than £0.100m
Reprofile	379	Brighton Centre Essential Maintenance	Works can only be completed in line with events programme. Request to bring forward £0.379m from 2026/27 into this year for the VIP Balcony project to complete this in time for use this financial year. This will ensure support of the delivery of projects income within the MTFS.
Reprofile	332	Pavilion and Mess Room Refurbishment Programme	Deferred spend on Pavilions to 2026/27 except for works at Wish Park, Stanmer Pavilion, Bear Road and Floral Clock. Budget reprofiled to reflect expected works.
Variation	(470)	Pavilion and Mess Room Refurbishment Programme	Pavillion and Mess Room Refurbishment Programme budget reallocated to individual project codes for easier management and monitoring.
Variation	(216)	Prince Regent Capital Works	Reduction and reprofiling of budget as agreed at Capital Programme Board meeting.
Variation	470	Various schemes	Pavillion and Mess Room Refurbishment Programme budget reallocated to individual project codes for easier management and monitoring: £0.185m Bear Road Messroom £0.125m Floral Clock

Detail Type	Amount £'000	Project	Description
			£0.100m Wish Pavilion £0.060m Stanmer Pavilion
Variation	(176)	Various schemes	Variations to budget of less than £0.100m: (£0.092m) Electrical Infrastructure at City Parks Fleet (£0.073m) Volks Railway Disabled Access Carriage (£0.007m) Seafront Railings & Beach Hut Replacement (£0.002m) Woodland Creation Scheme (£0.001m) Electrical Vehicle for Waterhall (£0.001m) Rewilding Residents of Brighton & Hove
Environmental Services			
Reprofile	(1,194)	Public Conveniences	Phase 3 (Colonnade and Rotunda) spend will be delayed to 2026/27, with potential savings of £0.300m identified. Options to repurpose £0.300m will be explored, pending decisions to be made on savings proposals in this service, elsewhere on this agenda.
Reprofile	(709)	Improving the Communal Bin System	Reprofile of budget as a result of reprioritisation of projects and also awaiting the results of bin and glass collection trials.
Reprofile	(626)	On-Street and Communal Bin Infrastructure	Reprofile of budget as a result of reprioritisation of projects and also awaiting the results of bin and glass collection trials.
Variation	(542)	Hollingdean Depot Office Accommodation	Budget reduced and reallocated to new scheme Hollingdean Depot EV Charging Installation.
Variation	(1)	City Parks Diesel Reduction Programme	Variation to budget of less than £0.100m.
Place			
Reported to Other Committee	2,300	King Alfred Leisure Centre Regeneration Project	Reported to Cabinet on 25th September 2025

Central Hub - Capital Budget Summary

Forecast Variance Month 5 £'000	Unit	Reported Budget Month 5 £'000	Reported at Other Committees £'000	New Schemes £'000	Variations, Slippages & Reprofiles £'000	Reported Budget Month 7 £'000	Forecast Outturn Month 7 £'000	Forecast Variance Month 7 £'000	Forecast Variance Month 7 %
0	Finance and Property	22,507	520	0	(3,014)	20,013	20,013	0	0.0%
0	Welfare Revs & Busi Support	1,345	0	0	0	1,345	1,345	0	0.0%
0	People and Innovation	123	0	0	0	123	123	0	0.0%
0	Total Central Hub	23,975	520	0	(3,014)	21,481	21,481	0	0.0%

Details of Variation requests and explanations of significant Forecast Variances, Slippage or Reprofiles are given below:

Detail Type	Amount £'000	Project	Description
Finance & Property			
Reported at Other Committee	520	Workspace Innovation	Reported to Cabinet on 16/10/25 within the report for the Asset Management Plan, relating to the decant from Bartholomew House and adaptations to Hove Town Hall.
Reprofile	(1,468)	Carbon Reduction Measures to Operational Buildings	Around £0.500m-£0.600m is due to be committed to LED replacement programme across civics and care homes. This should provide Year 1 revenue savings. Reprofile of remaining budget into future tranches of £0.5m up until 2029/30. This reflects existing staff capacity and availability of revenue to fund feasibility & design works prior to capital spend.
Reprofile	(155)	Madeira Terrace Structural Repairs	Major structural repair works are required at Madeira Terraces which currently is structurally propped for stability and ongoing minor works. Further intrusive structural investigation has been instructed and there is the plan to carry out recommended remedial works in phases from this FY through to 28/29 to minimise any disruption to use of spaces within the vicinity of the terraces.
Reprofile	(116)	Imperial Arcade/Arcade Building Works	Forward funding repairs at Imperial Arcade which will be repaid by the tenant service charge.

Detail Type	Amount £'000	Project	Description
Variation	(622)	Commercial Property Portfolio Repairs	This budget funds dilapidation works and fees, and is funded dilapidation settlements. Budget can be reduced to accommodate current commitments.
Variation	(400)	Schools Energy Efficiency Reinvestment fund	This scheme was initially devised as a 'recycling' model, where the initial capital outlay was repaid from energy savings. Department for Education Guidance IFRS16 for Maintained Schools now requires secretary of state consent for purchasing LED lighting systems in this way, making progress unlikely. Should schemes come forward, can be considered on a case-by-case basis.
Variation	(200)	Asbestos Surveys	Realignment of Asset Management Fund (AMF) capital budgets in line with the anticipated expenditure for this year.
Variation	(130)	Carbon Reduction Measures to Operational Buildings	Budget decommitted as agreed at the Capital Programme Board meeting
Variation	(130)	Mile Oak Community Centre PMB	Realignment of Planned Maintenance Budget (PMB) in line with the anticipated expenditure for this year.
Variation	(130)	Kings Rd Playground/Paddling Pool PMB	Realignment of PMB capital budgets in line with the anticipated expenditure for this year.
Variation	(123)	Decarbonised Heat Pilots/Heat Pumps	Alternative funding secured by a community group for decarbonisation of a community centre. Budget therefore no longer required.
Variation	200	2025/26 Asbestos Programme	Realignment of AMF capital budgets in line with the anticipated expenditure for this year.
Variation	115	Hove Town Hall G101 Redesign	Realignment of PMB capital budgets in line with the anticipated expenditure for this year.
Variation	145	Various schemes	Variations to budget of less than £0.100m: (£0.080m) Peter Pan Playground - Maderia Drive PMB (£0.070m) Access Improvements to Corporate Buildings (£0.064m) Cemeteries Structural Works (£0.059m) Corporate Landlord Essential works (£0.015m) Mechanical Boiler Replacement (£0.015m) Passenger Lift H&S Works (£0.009m) Industrial House PMB £0.070m Computer Aided Facilities Management (CAFM) System

Detail Type	Amount £'000	Project	Description
			£0.066m Patcham Tower Clock PMB £0.060m Easthill Park House PMB £0.055m Hove Town Hall PMB £0.045m HOP50+ PMB £0.030m Misc Internal Refurbishments £0.025m Preston Park Rotunda PMB £0.024m Beaconsfield Villas PMB £0.020m Dovecote PMB £0.020m Prince Regent Sports Complex PMB £0.015m Withdean SC Mechanical work -PMB £0.010m Rottingdean Grange Library & Museum Boiler PMB £0.010m Hollingdean Lane Phase 1 Repair Wall £0.007m King Alfred Leisure Centre PMB

Housing Revenue Account (HRA) – Capital Budget Summary

Forecast Variance Month 5 £'000	Unit	Reported Budget Month 5 £'000	Reported at Other Committees £'000	New Schemes £'000	Variations, Slippages & Reprofiles £'000	Reported Budget Month 7 £'000	Forecast Outturn Month 7 £'000	Forecast Variance Month 7 £'000	Forecast Variance Month 7 %
(134)	Housing Regeneration	51,678	4,749	0	(3,000)	53,427	53,293	(134)	-0.3%
(5,725)	Homes & Investment	53,825	0	0	93	53,918	43,131	(10,787)	-20.0%
(5,859)	Total Homes & Adult Social Care - HRA	105,503	4,749	0	(2,907)	107,345	96,424	(10,921)	-10.2%

Details of Variation requests and explanations of significant Forecast Variances, Slippage or Reprofiles are given below:

Detail Type	Amount £'000	Project	Description
Housing Regeneration			
Reported at Other Committee	4,749	Small Sites Delivery	Cabinet Meeting (16/10/25) 'Housing Supply and Asset Management Plan' - Approval of HRA capital budget of £4.749m inclusive of all fees and statutory taxes to be funded by HRA Borrowing and commuted sums for the acquisition of properties.
Reprofile	(3,000)	Small Sites Delivery	The reprofile represents the likely timescales in relation to the agreed acquisitions.
Variance	(134)	Various schemes	Variances of less than £0.100m: (£0.085m) Palace Place Redevelopment (£0.035m) Victoria Road (£0.008m) Rotherfield Crescent (£0.006m) Housing Joint Venture
Homes & Investment			
Variation	93	Minor Capital Works	Variation to budget of less than £0.100m
Variance	(4,910)	Structural Repairs	The major capital works projects are subject to review and authorisation of the Building Safety Regulations (BSR). The Building Safety Act requirements continue to impact on delivery timescales to projects as consideration needs to be given to other works, wider than just the capital works, and this is impacting on getting on-site. The service are

Detail Type	Amount £'000	Project	Description
			working on future years programmes to bring forward applications to BSR where possible and other low-rise blocks in advance of future programmes.
Variance	(1,676)	Doors	This programme has been impacted by timescales in the assessment of building safety regulator applications and a detailed review of the priority of works to blocks as part of the wider fire safety programmes across the housing stock.
Variance	(1,088)	Windows	Revised programme of works this financial year largely as a result of procurement timelines for the delivery of timber windows and also in relation to where works were expected to be jointly undertaken with External Decorations programme. This will be kept under close review and where further works are identified there maybe scope to increase spend to be reported at TBM09.
Variance	(950)	Service Risers	This is a new work stream, where both a programme and procurement of contractors needs to be fully developed, meaning that there will be minimal spend this financial year.
Variance	(901)	External Decorations & Repairs	There is a reduced spend against this programme this financial year owing to the contractor going into administration and the timescales for all new projects impacting on delivery.
Variance	(510)	Lifts Refurbishment	There have been difficulties with the contractor that has resulted in revised timescales in agreeing capital works for lift replacements. All sites continue to offer a reliable service and appropriate repairs carried out where needed.
Variance	(450)	Asbestos Removal Programme	It is unlikely that there will be a full spend this financial year. Work is underway to develop a programme for future years.
Variance	(150)	Sheltered Schemes Equipment	A revised timeline in delivery of works to facilitate the switch-over from analogue to digital will result in an underspend compared to previous budget assumptions.
Variance	(130)	Citywide Loft Conversions & Extensions Projects	Revised timelines against a couple of projects.
Variance	(22)	Home Energy Efficiency & Renewables	Variance of less than £0.100m

New schemes to be added to the Capital Programme for 2025/26 to be Approved

New Capital Project Approval Request	
Directorate:	Culture & Environment
Unit:	City Parks Allotments
Project Title:	Trackway Restoration Lower Roedale Valley Allotments
Total Project Cost (All Years) £:	56,780

Purpose, Benefits & Risks:
Purpose: Rebuilding access trackway for vehicle and pedestrian use, current trackway is dilapidated and requires re-establishment of the foundation, drainage and resurfacing. Scoping for best value and quotations were sourced using Lot 2 Highways Framework and work will be carried out in conjunction with the Highways Department Benefit: H&S Creating safe access for tenants, contractors and service provider's vehicles and pedestrians, significantly decreasing the likelihood and severity of potential incidents/accidents. Allotments have a statutory responsible to care for the health and wellbeing of their tenants and in addition S106 supports infrastructure development required. Consultation was undertaken with the local site representative, tenants and association and this project was highlight as one of the primary targets for improvements. Risk: The dilapidated condition of this frequently used access roadway was the cause of accidents and complaints: there are large ruts in the surface which makes it extremely difficult to navigate; the track is on an incline, and cars have gone off the track completely and into a ditch in two reported incidents. We have made a commitment to improve the existing conditions as part of the preventative measures resulting from the accident investigations, with the hope that we can prevent any reoccurrence public injury, and relieve environmental damage, potential claims and service pressures. Failure to deal with these cavities promptly would mean that the trackway would continue to deteriorate, coercing a more costly replacement in the future.

Capital Expenditure Profile (£'000):						
Funding Source (see guidance below)	**2025/26**	**2026/27**	**2027/28**	**2028/29**	**2029/30**	**Total All Years**
Section 106 Funding	57					57
Total Estimated Costs & Fees	**57**					**57**

Financial Implications:
Budget request requires TBM approval for this new capital project, pots taken from identified S106 allotment allocations for the local vicinity; funding entry for capital to be actioned at the end of the year

New Capital Project Approval Request	
Directorate:	Culture and Environment
Unit:	City Parks - Allotments
Project Title:	Trackway Restoration at Moulsecoomb Allotments
Total Project Cost (All Years) £:	£33,000

Purpose, Benefits & Risks:

Purpose: Rebuilding access trackway for vehicle and pedestrian use, current trackway is dilapidated and requires re-establishment of the foundation, drainage and resurfacing. Scoping for best value and quotations were sourced using Lot 2 Highways Framework and work will be carried out in conjunction with the Highways Department

Benefit: H&S Creating safe access for tenants, contractors and service provider's vehicles and pedestrians, significantly decreasing the likelihood and severity of potential incidents/accidents. Allotments have a statutory responsible to care for the health and wellbeing of their tenants and in addition S106 supports infrastructure development required. Consultation was undertaken with the local site representative, tenants and association and this project was highlight as one of the primary targets for improvements.

Risk: The dilapidated condition of this frequently used access roadway was the cause of accidents and complaints: there are large ruts in the surface which makes it extremely difficult to navigate; the track is on an incline, and cars have gone off the track completely and into a ditch in two reported incidents. We have made a commitment to improve the existing conditions as part of the preventative measures resulting from the accident investigations, with the hope that we can prevent any reoccurrence public injury, and relieve environmental damage, potential claims and service pressures. Failure to deal with these cavities promptly would mean that the trackway would continue to deteriorate, coercing a more costly replacement in the future.

Capital Expenditure Profile (£'000):

Funding Source (see guidance below)	**2025/26**	**2026/27**	**2027/28**	**2028/29**	**2029/30**	**Total All Years**
Section 106 Funding	33					33
Total Estimated Costs & Fees	**33**					**33**

Financial Implications:

Budget request requires TBM approval for this new capital project, pots taken from identified S106 allotment allocations for the local vicinity; funding entry for capital to be actioned at the end of the year

Appendix 7 – New Capital Schemes

New Capital Project Approval Request	
Directorate:	Homes and Adult Social Care
Unit:	ASC
Project Title:	New Steine Mews – Health and Safety Works
Total Project Cost (All Years) £:	£404,275

Purpose, Benefits & Risks:
This funding is to cover urgent health and safety remedial works at the Council owned New Steine Mews Hostel. This request also covers funding to support funding of alternative provision during the 3 months that the works will take. Works will take place from January 2026 for a period of 12 weeks. Contractor payment terms mean some costs will have been profiled in 2025/26 and 2026/27. The capital request below assumes contingency due to some build costs that may fluctuate.

Capital Expenditure Profile (£'000):

Funding Source (see guidance below)	**2025/26**	**2026/27**	**2027/28**	**2028/29**	**2029/30**	**Total All Years**
Borrowing	200	100				300
Specific Reserves	104					104
Total Estimated Costs & Fees	**304**	**100**				**404**

Financial Implications:
The estimated costs for this project total £0.404m. Of this, £0.104m funding will be from specific reserves. The borrowing costs will require funding within existing service budgets going forward to ensure that there are no ongoing revenue pressures.

New Capital Project Approval Request	
Directorate:	City Operations
Unit:	Environmental Services
Project Title:	Hollingdean Depot - EV charging installation
Total Project Cost (All Years) £:	1,830,224

Purpose, Benefits & Risks:

The council is seeking to electrify its refuse collection fleet to reduce fleet emissions. Following discussions, the supplier has been consulted and tasked with proposing a tailored charging solution to support the deployment of 65 electric refuse collection vehicle's (RCV's). The proposed infrastructure will enable the transition of up to 54 vehicles to electric power over the next five years, reducing fleet emissions by an estimated 430 tonnes of CO_2 annually in line with the Council's wider carbon reduction policy. This will be in addition to the existing EV charging infrastructure on site, albeit with limited power capacity for 10 electric RCVs. The proposal outlines the full electrification of Hollingdean depot which future proofs the charging infrastructure. A government grant is available to subsidise approximately £1 million of the cost, and we intend to apply for this funding with the expectation that it will be approved. The primary risk associated with the Electric Vehicle (EV) installation scheme is that, if the project is not successfully delivered, the Council will be unable to achieve its planned transition to electric RCV's. This would significantly hinder progress toward the Council's carbon reduction targets and broader sustainability objectives, as outlined in the Carbon Reduction Policy.

Capital Expenditure Profile (£'000):

Funding Source (see guidance below)	**2025/26**	**2026/27**	**2027/28**	**2028/29**	**2029/30**	**Total All Years**
Government Grant	1,000					1,000
Asset Value (AV) from Independent Connection Provider (ICP) – External Contribution	288					288
Borrowing	542					542
Total Estimated Costs & Fees	**1830**					**1830**

Financial Implications:

Funding and Conditions:
The EV charging infrastructure project will be funded through a combination of a £1 million Government Capital Grant, lump sum received from independent connection provider with the remaining funded from borrowing. The Government Grant application has been submitted and is expected to be approved, subject to the expected condition that installation is commenced within financial year 2025/26.

Following completion, the scheme will incur ongoing revenue costs for reactive and planned maintenance, estimated at approximately £8,610 per annum for 5 years. These costs will be met from revenue budgets. The £0.542m borrowing is to be met from an existing capital scheme within Environmental Services, and so the repayment of borrowing has already been allowed for in the budget.

New Capital Project Approval Request	
Directorate:	City Operations
Unit:	Place on behalf of City Parks
Project Title:	The Level – Former Velo Café
Total Project Cost (All Years) £:	£594,336

Purpose, Benefits & Risks:

To bring this building in the centre of the Level back into use. To improve the appearance of the park, and to safeguard the National Lottery Heritage Fund (NLHF) grant funding awarded in 2011 (applies until 2036). To save ongoing revenue expenditure and the need to fund demolition. The property will be leased to a local Brighton charity, FMG Foundation, who provide fitness trainer programmes to young people who are difficult to engage, adding social & health benefits (Outcome 2: A fair & inclusive city & outcome 3: A healthy city where people thrive). The decision to bring the property back into use was taken by DMT following an options appraisal. The lessee was chosen following an open marketing exercise. The project, including this budget was presented to DLT and CPB in November 2025 and supported.

The NLHF have invited BHCC to submit a further grant bid of up to £0.250m. BHCC are in discussion with the London Marathon Foundation to provide a grant of £0.150m. Some council borrowing is required, and £0.100m of approved borrowing has been allocated from the City Parks Pavilions capital budget. This has weighed against the ongoing revenue costs to keep the building safe and secure, the cost of demolition, the risk the NLHF might ask for the return of some or all their previous grant funding.

Capital Expenditure Profile (£'000):

Funding Source (see guidance below)	2025/26	2026/27	2027/28	2028/29	2029/30	Total All Years
Insurance receipt	7					7
Lessee contribution – FMG Foundation	10	227				237
National Lottery Heritage Fund Grant		250				250
Borrowing	20	80				100
Total Estimated Costs & Fees	**37**	**557**				**594**

Financial Implications:

£0.100m of council borrowing is from an existing approved budget – City Parks Pavilions. Request that this is moved to a new budget line to make monitoring easier, and therefore the cost for repaying borrowing is already allowed for within the revenue budget.

Lease term agreed to 15.12.2036, the date the 2012 NLHF funding liability ends. The NLHF grant to £0.250m, which the council will bid for to support this project, has a liability of five years. Lease will be rent free / nominal charge, to reflect the lessee's contribution to the capital costs and their charitable status. There are currently revenue costs to the council, and if not brought back into use, demolition is the likely outcome. This will be costly (Estates estimate - £0.240m) and would almost certainly have to be funded by borrowing. The Lessee contribution includes unconfirmed £0.150m grant from London Marathon Foundation. BHCC are supporting them with this bid. If the NLHF or LMF bids are unsuccessful the project will be paused and reviewed, there will be no automatic increase in council borrowing. Appointed consultants have agreed the project can be stopped at any point and only work completed to that point will be eligible for payment.

Treasury Management – 2025/26 Mid-Year Review

Introduction and Background

The Chartered Institute of Public Finance & Accountancy (CIPFA) has published Treasury and Prudential Codes, which require regular reporting of performance against forward looking prudential indicators. This appendix provides a mid-year review of treasury management activity for the first half of 2025/26, measured against benchmarks and the key indicators in the council's Treasury Management Strategy.

The 2024/25 Treasury Management Strategy Statement (TMSS), which includes the Annual Investment Strategy (AIS), was approved by Cabinet on 13 February 2025 and full Council on 27 February 2025 as part of the Budget Report. The Treasury Management Strategy sets out the role of Treasury Management, the strategy for Treasury Management activity in 2025/26, and the key parameters and indicators for investing council cash balances and undertaking borrowing for the year.

CIPFA defines treasury management as:

"The management of the local authority's borrowing, investments and cash flows, its banking, money market and capital market transactions, the effective control of the risks associated with those activities and the pursuit of optimum performance consistent with those risks."

The council is required to operate a balanced budget, which broadly means that cash raised during the year will meet cash expenditure. Part of the treasury management operation is to ensure that this cash flow is adequately planned, with cash being available when it is needed. Effective cash flow planning enables surplus monies to be invested in counterparties (financial institutions) or financial instruments commensurate with the council's risk appetite, providing adequate cash availability (liquidity) is maintained.

The second main function of the treasury management service is the funding of the council's capital plans. These capital plans provide a guide to the borrowing need of the council, essentially the longer-term cash flow planning, to ensure that the council can meet its capital spending obligations. This management of longer-term cash may involve arranging long or short-term loans or using longer-term cash flow surpluses. On occasion, when it is prudent and economic, any debt previously drawn on may be restructured to meet the council's risk or cost objectives.

Economic Background

The council's treasury advisors, MUFG, have provided their assessment of the UK and global economic landscapes as set out at Annex 2. The expectation for interest rates when the 2025/26 Treasury Management Strategy was set, based on external advice, was that Base Rate has peaked and there would be gradual reductions during 2025/26 and 2026/27. The Bank of England Base Rate has been reduced twice during the period, firstly by 0.25% to 4.25% in May 2025, and then by a further 0.25% to 4.00% in August 2025. The expectation is that the Bank of England Base Rate will continue to be reduced, with the expectation for at least one further rate cut during 2025/26.

Treasury Management Activity

Treasury management activity during the first half of 2025/26 has focused on keeping any surplus cash liquid, as opposed to investing into longer term, higher yielding deals, to ensure cash is available when required as reserve levels reduce and to avoid the need for long-term borrowing whilst rates remain elevated. Some short to medium term borrowing has been undertaken to reduce the HRA under borrowing position when there have been favourable movements in borrowing rates. The key activities undertaken in the period include:

- The return on investments has exceeded the target benchmark rates in the 6 months due to Money Market Fund (MMF) rates lagging behind the falling base rate.

- The highest investment risk indicator during the period was 0.002% which is below the maximum benchmark of 0.050%.
- The council took one new tranche of HRA borrowing in the period of £20.0m at a rate of 4.17% due for maturity in 2027/28.
- Short term borrowing of £15.0m was undertaken at the end of September to fund temporary reductions in liquid cash.
- The two borrowing limits approved by full Council have not been exceeded.
- The Annual Investment Strategy parameters have been met throughout the 6-month period.

Within the year to date, the council has complied with its legislative and regulatory requirements with regards to treasury management.

The following table summarises the treasury activity and day-to-day cash flows in the half year to September 2025 compared to the corresponding period in the previous year. The council has undertaken further long-term PWLB borrowing to reduce the HRA under-borrowing position in response to interest rates reductions and reducing cash balances. Further borrowing took place in October and the Treasury Management team continue to monitor the PWLB rate closely to secure further borrowing when rates are favourable.

Treasury Management Activity – April to September	**2024/25**	**2025/26**
Long-term borrowing raised (General Fund)	£0.0m	£0.0m
Long-term borrowing raised (HRA)	£0.0m	£20.0m
Long-term borrowing repaid (General Fund)	(£6.6m)	(£0.6m)
Long-term borrowing repaid (HRA)	(£7.0m)	(£4.0m)
Short-term borrowing raised/(repaid)	(£19.0m)	£10.0m
Investments made	(£335.1m)	(£371.9m)
Investments maturing	£390.9m	£375.3m
Net reduction/(increase) in bank balance	£0.7m	£0.8m
Net Cash Flow (Shortage)/Surplus	**(£23.9m)**	**£29.6m**

Investment Strategy

All parameters in the Annual Investment Strategy have been complied with in full.

No new counterparties have been added to the approved counterparty list during the year.

A summary of investments made by the in-house team and outstanding at 30 September 2025 is set out in the table below and shows that investments continue to be held in good quality, short-term instruments in line with the approved strategy.

Summary of Investments as at 30 September 2025		
'AAA' rated money market funds	£8.6m	30%
'AA' rated institutions*	£0.0m	0%
'A' rated institutions	£10.7m	37%
'BBB' rated institutions	£0.0m	0%
Unrated Funds	£9.4m	33%
Total Investments (excluding Bond Funds)	**£28.7m**	**100%**
Period – less than one week	£18.0m	63%
Period – between one week and one month	£0.1m	0%
Period – between one month and three months	£5.6m	20%
Period – between three months and 1 year	£0.0m	0%
Period – more than 1 year	£5.0m	17%
Total Investments (excluding Bond Funds)	**£28.7m**	**100%**

* *For the purposes of this analysis, other Local Authorities are assumed to have the same credit rating as the UK government (AA).*
** *All investments that are over one year either have a legal offset against debt with the same counterparty or are with other Local Authorities.*

Risk

As part of the investment strategy for 2025/26 the council agreed a maximum risk benchmark of 0.05% i.e. there is a 99.95% probability that the council will get its investments back. The benchmark is a simple target that measures risk based on the financial standing of counterparties and length of each investment based on historic default rates. The actual risk indicator has varied between 0.001% and 0.002% between April and September 2025, reflecting the high proportion of investments held in high security and/or very liquid investments. It should be remembered however that the benchmark is an 'average risk of default' measure and does not constitute an expectation of loss for any particular investment

Investment Risk Benchmark	0.050%
Maximum investment risk experienced April to September	0.002%

The treasury management service is subject to a detailed audit on a regular basis. This includes the testing of the control environment and the management of risk. A 'substantial' level of assurance was provided during the most recent audit in January 2025, meaning that controls are in place and are operating as expected to manage key risks to the achievement of system or service objectives.

Investment Performance

The council's investment portfolio (adjusted for pooled funds) performance between April 2025 and September 2025 was 4.35%, outperforming the benchmark rate of 4.19% by 16 basis points (or 0.16 percentage points). The investments performance has therefore outperformed the SONIA benchmark rate largely due to the time lag in Money Market Fund (MMF) rates adjusting to base rate changes (meaning the council has achieved elevated MMF rates in a falling rate environment).

Average Investment Balance (Apr – Sept) £m	Average Investment return	Average Benchmark Rate*	Difference
50.3	4.35%	4.19%	0.16%

* *The Benchmark rate used is the Standard Overnight Index Average (SONIA); a rate administered by the Bank of England based on actual transactions of overnight borrowing by financial institutions.*
** *Pooled funds have been excluded from this assessment due to volatility of return.*

Since Base Rates peaked at 5.25%, there have been several Base Rate reductions, with two reductions in the period reducing the bank rate to 4.00%. The transition to a falling rate environment, combined with significantly reduced liquid balances has prompted the decision not to place any long-term investments during the period. The current priority for officers is to maintain sufficient liquidity to allow the council to limit external borrowing whilst rates continue to fall.

The Royal London (RLAM) short dated funds total return (capital and revenue combined) was 4.328% between April and September 2025. The value of the investment at 30 September 2025 was £9.4m, which presents a reduction of capital value compared to an initial investment of £10.0m. This reduction of capital value is not a reduction in the worth of the individual assets in the fund but reflects a "marked to market" valuation of the funds at the end of each month, declining due to the steep rise in interest rates from December 2021. Capital valuations have

improved by 0.39% since 31 March 2025; a trend that is expected to continue now that the Base Rate has peaked and continues to fall.

Borrowing

The table below shows the Council's total external borrowing and average rates as at 30 September 2025, split between the General Fund and the HRA. New PWLB borrowing of £20.0m was undertaken in April 2025, at a rate of 4.17% for a term of two years to support the councils' HRA under borrowing position and to take advantage of favourable movement in borrowing rates. A total of £4.6m PWLB borrowing and £5.0m short-term borrowing matured during the period. Further short-term borrowing of £15.0m was undertaken at the end of September from another Local Authority to fund temporary reductions in liquid cash, undertaken on a rate of 4.3% for a period of 1 week.

	General Fund Borrowing	HRA Borrowing	Total Borrowing	Average Rate
PWLB	£143.3m	£252.0m	£395.3m	3.03%
Market Loans	£16.3m	£18.7m	£35.0m	4.33%
Total Long-Term Borrowing	**£159.6m**	**£270.7m**	**£430.3m**	**3.12%**
Average Rate of LT Borrowing	**3.00%**	**3.19%**	**3.12%**	
Short-Term Borrowing	£15.0m	£0.0m	£15.0m	4.30%
Average Rate of ST Borrowing	**4.30%**	**-**	**-**	**-**
Total Borrowing	**£174.6m**	**£270.7m**	**£445.3m**	

The table below shows the forecast of the Capital Financing Requirement (CFR) for both the General Fund and the HRA at TBM 7 compared to the estimate within the 2025/26 strategy approved in February 2025.

The TBM 7 General Fund Capital Programme forecast includes projects funded by borrowing of £54.6m compared to an original estimate of £66.000m. The under-borrowing position, if no action is taken, is currently projected at £125.4m. The General Fund strategy currently forecasts that the level of reserves and balances in the medium term allows internal borrowing of up to £75m, and it is currently expected that additional external borrowing of £50.4m may be required to support the capital programme during 2025/26, although the timing of actual borrowing will be dependent on the availability of cash balances and borrowing rates at the time.

General Fund Capital Financing Requirement (CFR) – Underlying Borrowing requirement	Original Estimate 2025/26	Revised forecast as at TBM7 2025/26
Opening General Fund CFR	£261.0m	£241.8m
Borrowing Need	£66.0m	£54.6m
Minimum Revenue Provision	(£12.0m)	(£11.4m)
Closing General Fund CFR	**£315.0m**	**£285.0m**
GF External Long-Term Borrowing as at 30 September 2025	**-**	**£159.6m**
Level of Under-borrowing	**-**	**£125.4m**

The TBM 7 HRA Capital Programme forecast includes projects funded by borrowing of £64.9m compared to an original estimate of £64.0m. The under-borrowing position, if no further action is taken, is currently projected at £95.5m. The HRA strategy for 2025/26 is to meet its borrowing

requirement from a combination of PWLB borrowing and the General Fund. The extent to which the HRA can borrow from the General Fund is dependent on the level of liquid resources the General Fund has available to lend to the HRA and additionally will depend on the view of interest rate prospects. In order to fully externally borrow to meet its CFR and it is therefore expected that new external borrowing from the PWLB of £95.5m will be required during 2025/26.

HRA Capital Financing Requirement (CFR) – Underlying Borrowing requirement	**Original Estimate 2025/26**	**Revised forecast as at TBM7 2025/26**
Opening HRA CFR	£292.0m	£301.3m
Borrowing Need	£64.0m	£64.9m
Minimum Revenue Provision	-	-
Closing General; Fund CFR	**£356.0m**	**£366.2m**
HRA External Long-Term Borrowing as at 31 August 2025	-	**£270.7m**
Level of Under-borrowing	-	**£95.5m**

The table below shows that the Council is operating within the Operational Boundary and Authorised Borrowing Limits set within the Treasury Management strategy and has sufficient headroom to cover the borrowing need arising from the year's capital programme.

Borrowing Limits	**Operational Boundary £m**	**Authorised Borrowing Limit £m**
Limit set for 2025/26	£745.0m	£795.0m
Less: PFI & Leases	(£65.0m)	(£65.0m)
Limit for Underlying Borrowing	**£680.0m**	**£730.0m**
Actual External Borrowing at 30 September 2025	**£445.3m**	**£445.3m**
Headroom*	**£234.7m**	**£284.7m**

**Authorised Borrowing headroom cannot be less than zero*

The maturity profile of the Authority's borrowing is within the limits set within the strategy.

Maturity Profile of borrowing	**Lower Limit set**	**Upper Limit set**	**Actual as at 30 Sept 2025**
Under 12 Months	0%	40%	14%
12 months to 2 years	0%	40%	6%
2 years to 5 years	0%	50%	2%
5 years to 10 years	0%	75%	5%
Over 10 years	40%	100%	73%

Treasury Advisors

Officers recognise that responsibility for decisions remains with the organisation at all times and ensure that undue reliance is not placed upon external service providers and advisers. However, it is recognised that there is value in employing external providers of treasury management services in order to access specialist skills and resources.

Member Training

It is a requirement of CIPFA's Treasury Management code to ensure that the members responsible for decision making and scrutiny of the authority's TMSS are adequately trained to undertake their roles in this area. Treasury Management training was last provided in January 2024. This was offered to all members and is currently available on the Members section of the Learning Zone.

Annex 1 – Glossary of Terms

Authorised Borrowing Limit: The limit for which the council's external borrowing cannot breach. This limit is set by Council as part of the budget each year. This needs to be approved by Council to amend in the year if required.

Borrowing Maturity Profile: The timeline over which the council has to repay its debt. A smooth profile is preferable, as small, regular repayments reduce the risk of having to replace a lot of debt at a time when it may not be the optimum market conditions.

Capital Financing Requirement (CFR): The council's cumulative need to borrow to support its capital programme. This increases each year by capital expenditure where existing funding streams (such as reserves, capital receipts, grants or revenue contributions) have not been applied (which is also known as funding through borrowing). The Council must make an annual minimum revenue provision (MRP) which reduces the CFR.

Credit Ratings: The council uses the credit ratings for counterparties provided by the three main credit ratings agencies (Moodys, Fitch and Standard & Poor) to determine how much and for how long the council can lend to them. The highest credit rating as described in the strategy is AAA, and the lowest credit rating that the council is willing to lend to is BBB.

Operational Boundary: A limit set by Council as part of the budget each year. Whilst the Authorised Limit cannot be breached, the operational boundary is the expected level at which external debt will reach, taking into account current levels of debt, maturing debt that may need replacing and capital plans for the forthcoming year.

PWLB Loans: Loans held with the Public Works Loans Board. This is the primary lender for Local Authorities, and the PWLB forms part of the Debt Management Office (DMO) within the HM Treasury department of Central Government.
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Risk Benchmark: An indicator used to monitor the perceived level of risk within the council's investment portfolio.

Under-borrowing: (also known as internal borrowing) The difference between the council's CFR and actual level of debt, where the actual debt is lower than the CFR. This occurs when council uses cash from its own reserves to temporarily fund capital expenditure. Also known as Internal Borrowing.

SONIA: Sterling Over Night Index Average – A benchmark rate calculated and administrated by the Bank of England. This rate effective replaces LIBOR from 1 January 2022 as the key benchmark rate in the UK. The calculation of SONIA is based on actual transactions and reflects the average of the interest rates that banks pay to borrow sterling overnight from other financial institutions and institutional investors.

Annex 2 – Economic Overview

Provided by MUFG – September 2025

The first half of 2025/26 saw:

- A 0.3% pick up in GDP for the period April to June 2025. More recently, the economy flatlined in July, with higher taxes for businesses restraining growth.
- The 3m/yy rate of average earnings growth excluding bonuses has fallen from 5.5% to 4.8% in July.
- CPI inflation has ebbed and flowed but finished September at 3.8%, whilst core inflation eased to 3.6%.
- The Bank of England cut interest rates from 4.50% to 4.25% in May, and then to 4% in August.
- The 10-year gilt yield fluctuated between 4.4% and 4.8%, ending the half year at 4.70%.

From a GDP perspective, the financial year got off to a bumpy start with the 0.3% m/m fall in real GDP in April as front-running of US tariffs in Q1 (when GDP grew 0.7% on the quarter) weighed on activity. Despite the underlying reasons for the drop, it was still the first fall since October 2024 and the largest fall since October 2023. However, the economy surprised to the upside in May and June so that quarterly growth ended up 0.3% q/q. Nonetheless, the 0.0% m/m change in real GDP in July will have caused some concern, with the hikes in taxes for businesses that took place in April this year undoubtedly playing a part in restraining growth. The weak overseas environment is also likely to have contributed to the 1.3% m/m fall in manufacturing output in July. That was the second large fall in three months and left the 3m/3m rate at a 20-month low of -1.1%. The 0.1% m/m rise in services output kept its 3m/3m rate at 0.4%, supported by stronger output in the health and arts/entertainment sectors. Looking ahead, ongoing speculation about further tax rises in the Autumn Budget on 26 November will remain a drag on GDP growth for a while yet. GDP growth for 2025 is forecast by Capital Economics to be 1.3%.

Sticking with future economic sentiment, the composite Purchasing Manager Index for the UK fell from 53.5 in August to 51.0 in September. The decline was mostly driven by a fall in the services PMI, which declined from 54.2 to 51.9. The manufacturing PMI output balance also fell, from 49.3 to 45.4. That was due to both weak overseas demand (the new exports orders balance fell for the fourth month in a row) and the cyber-attack-induced shutdown at Jaguar Land Rover since 1 September reducing car production across the automotive supply chain. The PMIs suggest tepid growth is the best that can be expected when the Q3 GDP numbers are released.

Turning to retail sales, and the 0.5% m/m rise in volumes in August was the third such rise in a row and was driven by gains in all the major categories except fuel sales, which fell by 2.0% m/m. Sales may have been supported by the warmer-than-usual weather. If sales were just flat in September, then in Q3 sales volumes would be up 0.7% q/q compared to the 0.2% q/q gain in Q2.

With the November Budget edging nearer, the public finances position looks weak. Public net sector borrowing of £18.0bn in August means that after five months of the financial year, borrowing is already £11.4bn higher than the OBR forecast at the Spring Statement in March. The overshoot in the Chancellor's chosen fiscal mandate of the current budget is even greater with a cumulative deficit of £15.3bn. All this was due to both current receipts in August being lower than the OBR forecast (by £1.8bn) and current expenditure being higher (by £1.0bn). Over the first five months of the financial year, current receipts have fallen short by a total of £6.1bn (partly due to lower-than-expected self-assessment income tax) and current expenditure has overshot by a total of £3.7bn (partly due to social benefits and departmental spending). Furthermore, what very much matters now is the OBR forecasts and their impact on the current budget in 2029/30, which is when the Chancellor's fiscal mandate bites. As a general guide, Capital Economics forecasts a deficit of

about £18bn, meaning the Chancellor will have to raise £28bn, mostly through higher taxes, if she wants to keep her buffer against her rule of £10bn.

The weakening in the jobs market looked clear in the spring. May's 109,000 m/m fall in the PAYE measure of employment was the largest decline (barring the pandemic) since the data began and the seventh in as many months. The monthly change was revised lower in five of the previous seven months too, with April's 33,000 fall revised down to a 55,000 drop. More recently, however, the monthly change was revised higher in seven of the previous nine months by a total of 22,000. So instead of falling by 165,000 in total since October, payroll employment is now thought to have declined by a smaller 153,000. Even so, payroll employment has still fallen in nine of the ten months since the Chancellor announced the rises in National Insurance Contributions (NICs) for employers and the minimum wage in the October Budget. The number of job vacancies in the three months to August stood at 728,000. Vacancies have now fallen by approximately 47% since its peak in April 2022. All this suggests the labour market continues to loosen, albeit at a declining pace.

A looser labour market is driving softer wage pressures. The 3m/yy rate of average earnings growth excluding bonuses has fallen from 5.5% in April to 4.8% in July. The rate for the private sector slipped from 5.5% to 4.7%, putting it on track to be in line with the Bank of England's Q3 forecast (4.6% for September).

CPI inflation fell slightly from 3.5% in April to 3.4% in May, and services inflation dropped from 5.4% to 4.7%, whilst core inflation also softened from 3.8% to 3.5%. More recently, though, inflation pressures have resurfaced, although the recent upward march in CPI inflation did pause for breath in August, with CPI inflation staying at 3.8%. Core inflation eased once more too, from 3.8% to 3.6%, and services inflation dipped from 5.0% to 4.7%. So, we finish the half year in a similar position to where we started, although with food inflation rising to an 18-month high of 5.1% and households' expectations for inflation standing at a six year high, a further loosening in the labour market and weaker wage growth may be a requisite to UK inflation coming in below 2.0% by 2027.

An ever-present issue throughout the past six months has been the pressure being exerted on medium and longer dated gilt yields. The yield on the 10-year gilt moved sideways in the second quarter of 2025, rising from 4.4% in early April to 4.8% in mid-April following wider global bond market volatility stemming from the "Liberation Day" tariff announcement, and then easing back as trade tensions began to de-escalate. By the end of April, the 10-year gilt yield had returned to 4.4%. In May, concerns about stickier inflation and shifting expectations about the path for interest rates led to another rise, with the 10-year gilt yield fluctuating between 4.6% and 4.75% for most of May. Thereafter, as trade tensions continued to ease and markets increasingly began to price in looser monetary policy, the 10-year yield edged lower, and ended Q2 at 4.50%.

More recently, the yield on the 10-year gilt rose from 4.46% to 4.60% in early July as rolled-back spending cuts and uncertainty over Chancellor Reeves' future raised fiscal concerns. Although the spike proved short lived, it highlighted the UK's fragile fiscal position. In an era of high debt, high interest rates and low GDP growth, the markets are now more sensitive to fiscal risks than before the pandemic. During August, long-dated gilts underwent a particularly pronounced sell-off, climbing 22 basis points and reaching a 27-year high of 5.6% by the end of the month. While yields have since eased back, the market sell-off was driven by investor concerns over growing supply-demand imbalances, stemming from unease over the lack of fiscal consolidation and reduced demand from traditional long-dated bond purchasers like pension funds. For 10-year gilts, by late September, sticky inflation, resilient activity data and a hawkish Bank of England have kept yields elevated over 4.70%.

The FTSE 100 fell sharply following the "Liberation Day" tariff announcement, dropping by more than 10% in the first week of April - from 8,634 on 1 April to 7,702 on 7 April. However, the de-escalation of the trade war coupled with strong corporate earnings led to a rapid rebound starting in late April. As a result, the FTSE 100 closed Q2 at 8,761, around 2% higher than its value at the end of Q1 and more than 7% above its level at the start of 2025. Since then, the FTSE 100 has enjoyed a further 4% rise in July, its strongest monthly gain since January and outperforming the

S&P 500. Strong corporate earnings and progress in trade talks (US-EU, UK-India) lifted share prices and the index hit a record 9,321 in mid-August, driven by hopes of peace in Ukraine and dovish signals from Fed Chair Powell. September proved more volatile and the FTSE 100 closed Q3 at 9,350, 7% higher than at the end of Q1 and 14% higher since the start of 2025. Future performance will likely be impacted by the extent to which investors' global risk appetite remains intact, Fed rate cuts, resilience in the US economy, and AI optimism. A weaker pound will also boost the index as it inflates overseas earnings.

MPC meetings: 8 May, 19 June, 7 August, 18 September 2025

There were four Monetary Policy Committee (MPC) meetings in the first half of the financial year. In May, the Committee cut Bank Rate from 4.50% to 4.25%, while in June policy was left unchanged. In June's vote, three MPC members (Dhingra, Ramsden and Taylor) voted for an immediate cut to 4.00%, citing loosening labour market conditions. The other six members were more cautious, as they highlighted the need to monitor for "signs of weak demand", "supply-side constraints" and higher "inflation expectations", mainly from rising food prices. By repeating the well-used phrase "gradual and careful", the MPC continued to suggest that rates would be reduced further.

In August, a further rate cut was implemented. However, a 5-4 split vote for a rate cut to 4% laid bare the different views within the Monetary Policy Committee, with the accompanying commentary noting the decision was "finely balanced" and reiterating that future rate cuts would be undertaken "gradually and carefully". Ultimately, Governor Bailey was the casting vote for a rate cut but with the CPI measure of inflation expected to reach at least 4% later this year, the MPC will be wary of making any further rate cuts until inflation begins its slow downwards trajectory back towards 2%.

The Bank of England does not anticipate CPI getting to 2% until early 2027, and with wages still rising by just below 5%, it was no surprise that the September meeting saw the MPC vote 7-2 for keeping rates at 4% (Dhingra and Taylor voted for a further 25bps reduction).

The Bank also took the opportunity to announce that they would only shrink its balance sheet by £70bn over the next 12 months, rather than £100bn. The repetition of the phrase that "a gradual and careful" approach to rate cuts is appropriate suggests the Bank still thinks interest rates will fall further but possibly not until February, which aligns with both our own view and that of the prevailing market sentiment.

Interest Rate Forecasts

The Authority has appointed MUFG Corporate Markets as its treasury advisors and part of their service is to assist the Authority to formulate a view on interest rates. The PWLB rate forecasts below are based on the Certainty Rate (the standard rate minus 20bps) which has been accessible to most authorities since 1 November 2012.

MUFG Corporate Markets' latest forecast on 11 August sets out a view that short, medium and long-dated interest rates will fall back over the next year or two, although there are upside risks in respect of the stickiness of inflation and a continuing tight labour market, as well as the size of gilt issuance.

MUFG Corporate Markets Interest Rate View 11.08.25													
	Sep-25	Dec-25	Mar-26	Jun-26	Sep-26	Dec-26	Mar-27	Jun-27	Sep-27	Dec-27	Mar-28	Jun-28	Sep-28
BANK RATE	4.00	4.00	3.75	3.75	3.50	3.50	3.50	3.50	3.25	3.25	3.25	3.25	3.25
3 month ave earnings	4.00	4.00	3.80	3.80	3.50	3.50	3.50	3.50	3.30	3.30	3.30	3.30	3.30
6 month ave earnings	4.00	3.90	3.70	3.70	3.50	3.50	3.50	3.50	3.30	3.30	3.40	3.40	3.40
12 month ave earnings	4.00	3.90	3.70	3.70	3.50	3.50	3.50	3.50	3.30	3.40	3.50	3.60	3.60
5 yr PWLB	4.80	4.70	4.50	4.40	4.30	4.30	4.30	4.20	4.20	4.20	4.20	4.10	4.10
10 yr PWLB	5.30	5.20	5.00	4.90	4.80	4.80	4.80	4.70	4.70	4.70	4.70	4.60	4.60
25 yr PWLB	6.10	5.90	5.70	5.70	5.50	5.50	5.50	5.40	5.40	5.30	5.30	5.30	5.20
50 yr PWLB	5.80	5.60	5.40	5.40	5.30	5.30	5.30	5.20	5.20	5.10	5.10	5.00	5.00

Brighton & Hove City Council

Cabinet Agenda Item 84

Subject: **General Fund Draft Budget and Resources Update – 2026-27 to 2029-30**

Date of meeting: **Thursday, 11 December 2025**

Report of: **Cabinet Member for Finance and City Regeneration**

Lead Officer: **Name: Chief Finance Officer**

Contact Officers: **Name: John Hooton, Haley Woollard**

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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 Report & Policy Context

1.1 This report provides a budget planning and resource update as a key part of the preparation for the 2026/27 annual budget and Council Tax setting process together with Medium Term Financial Plan projections over the next 4-year period, including any changes in assumptions and estimates together with a high level assessment the key impacts of the government's Autumn Statement, announced 26 November 2025, and the Local Government Finance Policy Statement announced 20 November 2025, as far as they can be locally interpreted.

1.2 The council aims to align all spending, ringfenced and un-ringfenced, to support the achievement of Council Plan outcomes and priorities. The General Fund budget in particular is an expression of the Council Plan in financial terms and aims to ensure that revenue and capital budgets and investment plans are aligned to achieving the outcomes of the Council Plan for a 'better Brighton and Hove for all'.

2 Recommendations:

That Cabinet:

2.1 Note the updated forecasts including funding assumptions and net expenditure projections included in this report.

2.2 Note the updated predicted budget gaps totalling over £86 million over the Medium Term Financial Strategy period, including £24.926m in 2026/27.

2.3 Note the draft savings proposals totalling £12.446m at Appendix 1.

2.4 Note the draft accompanying Equality Impact Assessments (EIAs) at Appendix 4, and note that the final EIAs will be provided to Cabinet and Budget Council in February 2026.

2.5 Approve the extension of the Innovation Fund to 2029/30, committing additional total funding of £8.140m, as detailed in Section 6, to ensure the continuation of transformational activity across the full Medium Term Financial Strategy period to 2029/30.

2.6 Approve the release of £1.041m of earmarked reserves into a new general risk reserve as set out in Section 8 and Appendix 5.

2.7 Note that plans to arrive at a legally balanced budget for 2026/27, and the legal requirement to set a Council Tax will be presented to Cabinet and Budget Council in February 2026.

2.8 Note that projections for next year and the Medium Term Financial Strategy (MTFS) will be updated following the announcement of the Provisional Local Government Finance Settlement, expected week commencing 15 December 2025.

3 Context and Background Information

Overview

3.1 The General Fund Budget & Resources update to July Cabinet outlined that the context for budget setting remains very challenging. There are significant budget pressures arising from increases in demand from statutory services, particularly temporary accommodation, adults and children's placements, and home to school transport. In addition, there are various other pressures across the council in terms of demand, pressures on income sources and the cost of providing services over and above inflation. These pressures are the key drivers of the budget shortfalls over the MTFS, as the anticipated increase in resources is largely expected to fund the inflationary increase in the cost of delivery services over the period.

3.2 Compounding this, the government's review of the allocation of local government resources under the Fair Funding Review, coupled with the Business Rates Reset, is expected to result in the council's core spending power increasing much more slowly than the assumptions within the MTFS, resulting in lower resources than previously anticipated.

3.3 Consequently, the July report estimated an expected budget gap of nearly £40 million in 2026/27 and more than £95 million over the 4-year MTFS period.

3.4 The council's financial sustainability is also impacted by the low level of reserves held compared to other similar sized authorities. The authority is therefore unable to withstand significant financial shocks at a time where financial risks to councils are arguably greater than they have ever been.

3.5 The report in July indicated the authority would need to take a longer-term view and focus on managing the pressures being faced by the authority and taking a transformation approach to planning to meet the budget shortfalls forecast over the 4-year period and to bring the authority into a more sustainable financial position.

3.6 A substantial amount of work has taken place between July and December on the Council's budget position, particularly in terms of working to reduce/mitigate pressures. This work, alongside reviewing the capital programme and incorporating the updated pensions employer contributions,

has resulted in an updated budget gap for 2026/27 of £24.926m. Savings proposals have been identified of £12.446m, leaving a remaining gap of £12.480m. Further work is ongoing to identify further savings, as well as assessing the impact of the Fair Funding Review on the Council's funding position. If further savings proposals cannot be found, or if the projected government funding position is not significantly improved, then the Council would need to apply to the government for exceptional financial support.

3.7 As well as balancing the budget for 2026/27, the Council needs to develop a comprehensive medium term financial plan that addresses its budget gap over the 4 year period to 2030. The Council's transformation programme is the mechanism for developing this plan. Good progress has been made on this, but there is much more to do, further detail is set out in section 5 of this report.

National Context

3.8 The Local Government Finance Policy Statement (policy statement) was published by the government on 20 November 2025, outlining the government's approach to funding local government over the multi-year settlement period of 2026/27 to 2028/29. In addition, the government also published its outcome responses to both the Fair Funding Review 2.0 (FFR) consultation and the Business Rates reset (BRR) consultation; both of which were consulted upon earlier in 2025.

3.9 The Provisional Local Government Finance Settlement (Provisional LGFS) is expected to be announced the week commencing 15 December 2025. Whilst this leaves some uncertainty over the council's final funding position for 2026/27 until the provision LGFS is published, the announcement will be the first multi-year settlement since 2016, providing certainty for the council as to its level of resources over the three-year period to 2028/29. This will in turn facilitate planning and provide certainty over the extent of the transformation activity required over the next three years.

3.10 The policy statement set out that an additional £3.4 billion new grant funding would be delivered through the multi-year settlement. Taken together with the 2.99% core council tax and 2.0% ASC precept, this will result in a 2.6% real terms increase in core spending power across the multi-year period. It's important to note, however, that this 2.6% is an average increase; the Fair Funding Review and Business rates reset will ultimately redistribute funding across all Local Authorities, and therefore actual changes in core spending power will be very different across local authorities.

3.11 Paragraphs 4.2 to 4.9 provide more detail on the announcements within the policy statement, the outcome of the fair funding review consultation and the expected impact on the council. A pressure of £6.000m was included to reflect the expected impact of the FFR on the authority. Whilst there has been some changes in the principles and methodology from what was consulted on, these are not expected to make a significant impact compared to what was already included in the MTFS within the July Report.

3.12 The government published its Autumn Budget on 26 November 2025, which announced several changes that will impact on Local Authorities going forwards. Most notably, the budget confirmed that the government's plans for Special Educational Needs & Disabilities (SEND) reforms will be announced early in the new year, including the announcement that the current statutory override will be extended for a year. Additionally, the government will not be

expecting local authorities to meet future funding implications for SEND within the general fund once the override ends at the end of 2027/28.

3.13 Paragraph 4.1 provides further information about the government's Autumn Budget

Local Financial Planning Context

3.14 The Targeted Budget Management (TBM) Month 7 report (elsewhere on this agenda) shows a forecast overspend of £7.776m for 2025/26. The key drivers for the overspend are adults and children's social services, home to School transport, and Homelessness and Temporary Accommodation. These are the same key drivers of the council's service pressures across the MTFS. In particular, the council has seen a sharp increase in families presenting as homeless and a corresponding increase in the cost of providing temporary accommodation, which is one of the major challenges facing the authority currently.

3.15 The Council's reserves are at a critically low level, and one of the lowest levels in the country across unitary authorities. This creates significant issues in terms of the Council's inability to withstand financial shocks (for example unexpected costs or increases in demand for statutory services). Diligent financial management over the past two years has seen the Council's General Fund working balance increase from under £7 million to a current position of £9 million. The target level of un-ringfenced General Fund reserves (i.e. General Fund working balance and General risk reserve) over the MTFS period is £12-£15 million. Given the current overspend position at TBM7, the Council's Chief Finance Officer is undertaking a review of all earmarked reserves and will bring all funds that are not contractually committed into the risk provision, to ensure that these are available to offset in-year overspend position.

3.16 The Council has received a few recommendations in respect of its level of reserves and lack of financial sustainability. The external auditors have raised a significant weakness in respect of financial sustainability, and the LGA Corporate Peer Challenge highlighted financial sustainability as the Councils top issue, noting that it needed to prioritise a plan to increase its level of reserves at pace.

4 Resources and Planning Assumptions 2026/27

Autumn Statement 2025

4.1 The government published it's Autumn Budget on 26 November 2025, which included the following key headlines:

- The abolishment of the two child limit for Universal Credit claimants, which will help the City's poorest households;
- Extension of the current override for deficits on the Dedicated Schools Grant (DSG) to March 2028, and the announcement that the government does not expect local authorities to continue to fund deficits within the general fund after the override ends. SEND Reform plans will be announced in early 2026;
- A council tax surcharge to be introduced in April 2028 for high value properties over £2 million, which will be used to support local government services;

- Additional funding of £48 million to go into the Planning system to boost capacity and capability over the next three years;
- Announcement of plans to allow authorities to introduce an overnight visitor levy, along with a consultation regarding the design;

Local Government Finance Policy Statement

4.2 The Local Government Finance Policy Statement 2026/27 to 2028/29 (policy statement) was published on the 20 November 2025 alongside the government's outcome response to the Fair Funding Review 2.0 consultation.

4.3 The policy statement sets out the government's proposals for the 2026/27 to 2028/29 multi-year local government finance settlement. Whilst the policy statement does not provide individual allocations for authorities, it does provide the principles for allocations ahead of the Provisional Local Government Finance Settlement (LGFS). Uncertainty over actual allocations will remain until the Provisional LGFS is announced, likely to be week commencing 15 December 2025.

4.4 The FFR 2.0 aims to align funding with local need and deprivation whilst simplifying and consolidating multiple fundings streams for local authorities. This is the most significant change in local government funding since 2013. In addition, the Provisional LGFS will be the first multi-year settlement announced since the four-year settlement of 2016, allowing local authorities better certainty and ability to plan over the medium term.

4.5 As a result of the consultation, the government has made some changes to the formula methodology as well as increasing protections by introducing new funding floors for those authorities losing from the funding reforms. This increase in protection will result in all authorities moving incrementally to their new funding allocations over the settlement period.

4.6 The policy statement also confirmed the continuation of the Recovery Grant of £600 million, first distributed in 2025/26 to 50% of authorities based on tax raising ability and deprivation. This will continue to be allocated across the settlement period on the same methodology as 2025/26, which demonstrates the government's objective of distributing funding to those areas that need it most. The council did not receive any of the 2025/26 recovery grant and will therefore not receive any recovery grant over the settlement period.

4.7 The government confirmed additional local government funding of £3.4 billion over the settlement period, previously announced in the Spending Review in June 2025. The phasing of this additional funding is yet to be announced. The policy statement did confirm, however, that this funding included specific allocations of £900 million for Adult social care and £547 million for Children's Social Care over the settlement period. MHCLG have also confirmed that new burdens funding for food waste is included in the £3.4 billion.

4.8 What is not clear, but is assumed, is whether the total £3.4 billion includes the following allocations:

- the additional protection floors being provided;
- the continuation of the Recovery Grant of £600 million as announced as part of the policy statement.

4.9 The changes to the funding model are complex, At the time of writing, officers are working with local government finance experts to model and understand the likely impact of these changes will have on the Council's funding for

2026/27 to 2028/29. It is likely that there are changes that will be both favourable and unfavourable to the Council's position, and therefore until the Provisional LGFS is announced, the prevailing assumptions will remain in the MTFS.

Revenue Investment to Support Council Plan Priorities

4.10 The Council Plan 2023 to 2027 (as refreshed in July 2025) sets out a vision for Brighton & Hove to be a city to be proud of, a healthy, fair and inclusive city where everyone thrives. To deliver the vision of a Better Brighton and Hove for All, the council aims to be a learning council with well-run services.

4.11 Estimates for the need for investment in services, increased cost of delivering services and changes in demand for services in order to deliver the Council Plan are reviewed and updated regularly throughout the year. The below tables compares the estimates included in the July report (using TBM2 data up to May 2025) and current estimates (which use TBM6 data up to September 2025).

Table 1: Council Plan Investments & Service Pressures	**Original Recurrent Investment & Pressures 2026/27 (July)**	**Original Recurrent Investment & Pressures 2026/27 (Nov)**	**Movement**
	£m	**£m**	**£m**
A City to be proud of:			
Closure of New England House pending decision on the future of the building	1.200	1.200	-
Tree Disease Management	0.300	0.300	-
Investing in the future of service delivery (including revenue impact of assets to deliver services)	0.832	0.600	(0.232)
All other investments and pressures	0.428	0.580	0.152
A City to be proud of: Total	**2.760**	**2.680**	**(0.080)**
A fair & inclusive city			
Housing - Temporary Accommodation	10.951	11.106	0.155
Loss of Housing Benefit Subsidy	0.400	2.400	2.000
Expected loss of grant funding	0.687	0.700	0.013
All other investments and pressures	0.255	0.549	0.294
A fair & inclusive city: Total	**12.293**	**14.755**	**2.462**
A healthy city where people thrive			
Home to School Transport - Cost & Demand	1.285	1.285	-
Children's Agency Placements	3.378	1.811	(1.567)
Children's Disability Placements	0.583	0.483	(0.100)
Supporting Adults with Physical Needs	2.932	0.793	(2.139)
Supporting Adults with Learning Disability Needs	1.679	0.625	(1.054)
Supporting Adults with Mental Health Needs	3.732	0.891	(2.841)
Supporting children with complex needs in-house	0.452	0.301	(0.151)
Family Hub & preventative children's services	0.580	0.637	0.057
Support for Increased SEN Demand	0.469	0.366	(0.103)
Other Educational Services & Support	1.180	0.547	(0.633)

All other investments and pressures	0.385	-	(0.385)
A healthy city where people thrive: Total	**16.655**	**7.739**	**(8.916)**
A learning council with well-run services			
Loss of Funding from FFR	6.000	6.000	-
Investment in Emergency Planning service	-	0.150	0.150
Estimated cost of changes in Digital Innovation service	0.430	0.390	(0.040)
Income pressure within commercial property portfolio	-	0.201	0.201
New policy announcement re Cllrs in LGPS	-	0.100	0.100
All other investments and pressures	0.802	1.929	1.127
A learning council with well-run services: Total	**7.232**	**8.770**	**1.538**
Total Council Plan Investments & service pressures	**38.940**	**33.944**	**(4.996)**

4.12 Pressures are reviewed regularly through the year and updated based on demographic and demand changes, as well as management actions undertaken to mitigate and address pressures.

4.13 A number of pressure mitigations are being implemented to get to the budget position set out in this report. For example, automatic fee uplifts will not be made through our adult social care contracts and these will be assessed on a case by case basis looking at market data.

Council Tax

4.14 The council tax increase for 2026/27 and future years of the MTFS is currently assumed at 4.99%, which includes the continuation a 2.0% increase for an Adult Social Care Precept. These council tax increase levels were recently confirmed for the next 3 years in the local government finance policy paper as the maximum increases without requiring a referendum.

4.15 The impact of the current financial climate on council tax income continues to be difficult to predict. New housing developments have been assumed for 2026/27, with a council tax base increase assumed of 0.87%. Over the last few years, the cost-of-living crisis has impacted on the council tax collection rate. It is therefore assumed to remain at the 2025/26 level of 98.75% rather than reverting to the pre-pandemic level of 99%.

Business Rates

4.16 The government is introducing significant changes to the business rates system in 2026/27. This includes:

- The introduction of three new multipliers which will provide a more complex system for assessing the business rates liability of different types of businesses;
- A full Business Rate Reset, designed to redistribute growth accumulated by authorities since 2013/14;
- A new rating valuation list. This will update the rateable values for all properties, adding further uncertainty in the level of business rates income.

4.17 The Business Rate Reset is expected to result in a loss of locally retained business rates; the business rate income from 2026/27 will be based on the revised settlement funding assessment which will be derived from the changes implemented by the Fair Funding Review. The reduction of business rates

income is included in the £6.000m pressure in 2026/27 for loss of resources in relation to the Fair Funding Review and Business Rates Reset.

4.18 Business Rates forecasts continue to be an area of financial risk that is heightened by the unknown impacts of global financial events and the impact of current economic conditions on businesses. In addition, appeals continue to have a significant impact on forecasting business rates and the new valuation list will have its own level of appeal activity to forecast. Therefore, business rates estimates could change significantly ahead of setting the budget.

4.19 The provisional Local Government Finance Settlement is due week commencing 15 December 2025 at which time the level of assumed locally retained business rates will become much clearer.

Corporate Planning Assumptions

4.20 The July Cabinet report included an Appendix which outlined the corporate planning assumptions within the MTFS at that time. The current assumptions are included in Appendix 2 of this report.

4.21 The only change in core planning assumptions compared to those reported in July is the change in the Council's employer pension contribution rate. The council's contribution to the Local Government Pension Fund is agreed every three years based on a triennial actuary review of the fund's assets and expected liabilities. Following the most recent triennial review of the East Sussex Pension Fund by the fund's actuary, the council's pension fund assets are forecast to be in excess of the fund's liabilities by the next triennial review. This has resulted in an agreed reduction of the council's Employer Contribution rate by 4.9% from 19.8% to 14.9% for the next three years. Therefore, the council's cost of employer contributions is expected to reduce by £6.920m per annum from 1 April 2026.

Fees & Charges

4.22 The vast majority of Fees and Charges budgets for 2026/27 are assumed to increase by a standard inflation rate of 3.00%. The February Budget report will include an appendix of all fees & charges for 2026/27 that are required to be approved in advance of the financial year.

4.23 A number of budget proposals within Appendix 1 report are linked to proposed changes in fees or charges. The changes in fees and charges linked to these draft proposals will be included in the February report.

Commitments

4.24 The budget projections for 2026/27 includes commitments of (£1.788m), reflecting corporate changes and decisions already made. This represents a reduction in commitments of £10.019m compared to the commitments included in the July Report.

4.25 The below table shows the change in commitments between July & November:

Table 2: Commitments in the 2026/27 budget:	Jul 2025 Estimate	Dec 2025 Estimate	Movement
	£m	£m	£m
Budget Commitments (including capital financing)	3.839	0.740	(3.099)
Mainstream Digital funding	0.550	0.550	-
Change in contribution to reserves	3.015	3.015	-
2025/26 Pay Award above modelled allowance	0.827	0.827	-
Change in Employers Pension Contribution	-	(6.920)	(6.920)
Total Budget commitment	**8.231**	**(1.788)**	**(10.019)**

4.26 The primary movement is the change in employer pension contribution rate, as described in 4.21 above. Other significant changes include the impact of the 2025/27 capital programme review, and changes relating to the one-off use of grant to cover core budget expenditure.

5 Annual Budget and Medium Term Finance Plan Estimates

5.1 There are significant challenges to being able to balance the 2026/27 and the Medium Term Financial Plan (MTFP). Section 3 gives some wider context on the challenges being faced by the organisation both on a national level and locally. The 2026/27 budget shortfall as reported in July 2025 was the largest seen by the authority, largely due to the cost of and demand for a number of statutory services. This requires the authority to take urgent action to mitigate demand pressures and identify savings and transformation programmes that will address the gap both in 2026/27 and across the medium term. This is necessary to become a financially sustainable organisation. Identifying savings is becoming increasingly more difficult; the organisation has been required to make cumulative savings of more than £248 million since 2010.

5.2 In addition, the government have consulted on the largest changes in Local Government Funding since 2013. Whilst estimates have been made as to the council's expected ongoing funding position from both the Fair Funding review and the related Business Rates Reset (BRR), there will not be certainty on the outcome and impact of these changes until the Provisional Local Government Finance Settlement, expected to be announced in the third week of December. However, it must be acknowledged that why this brings uncertainty until announced, when announced, local authorities will have increased certainty over the medium term than has been the case in a number of years due to this being the first multi-year settlement since 2016.

5.3 Lastly, the Council Tax Base and Business Rate Tax Base will be set by Cabinet in January 2026.

5.4 The table below shows the current estimate for the 2026/27 budget gap and how it's moved from July report.

Table 3: Budget Gap Latest 2026/27	£m
Budget Gap per July Cabinet Report	**39.765**
Reduction in Council Plan investments & service pressures (table 1)	(4.996)
Impact of Capital Programme Review	(1.309)
Impact of Change in Employer Pension Contribution	(6.920)
Short term borrowing costs for King Alfred Leisure Centre	0.634

Change in use of grants	(2.408)
Other Changes	0.160
Budget Gap before Savings Proposals	**24.926**
Draft Saving Proposals to date (Appendix 1)	(12.446)
Remaining Budget Gap	**12.480**

5.5 Table below shows that the budget shortfalls is estimated at £86.658m over the MTFS before any savings proposals are considered.

Table 4: Budget Gaps – 2026/27 to 2029/30	**2026/27 £m**	**2027/28 £m**	**2028/29 £m**	**2029/30 £m**
Commitments & decisions already made	(1.788)	2.296	1.323	1.224
Net inflation (on Pay, Prices, Income, Pension)	9.691	9.437	10.191	10.478
Service Pressures (Demand and Cost)	33.944	25.132	25.112	19.661
Funding Changes (RSG & Tax Base)*	(16.921)	(13.845)	(14.258)	(15.019)
Budget Gap before Savings Proposals	**24.926**	**23.020**	**22.368**	**16.344**
Draft Saving Proposals to date (Appendix 1)	(12.446)	-	-	-
Draft MTFS proposals (Table 5)		(9.075)	(8.025)	(4.259)
Remaining Budget Gap	**12.480**	**13.945**	**14.343**	**12.085**

**This value will change following the Provisional Local Government Finance Settlement expected to be announced week commencing 15 December 2025. Currently there is a service pressure included to reflect the expected changes from the Fair Funding Review.*

5.6 Table 4 shows there would be a remaining shortfall of £52.853m based on current draft proposals within Table 5 and Appendix 1.

5.7 There are other options currently being explored to address the remaining gap in 2026/27, which are being developed and will come forward as part of the final budget report in February.

5.8 There is clearly still some way to go to ensure that the authority can reach a balanced budget in 2026/27 and a balanced MTFS, which will be addressed in the February report.

Addressing the Budget Gap – 2026/27 and over MTFS

5.9 There has been several workstreams and activity to address the budget shortfalls over the MTFS:

- A Capital Programme Review has been undertaken to ensure the programme is properly prioritised and funded over the 5-year Capital Investment Programme, given the current strain on the revenue budget. This workstream has identified areas for prioritisation, de-prioritisation and deferral which provide saving and reprofiling of borrowing costs from the 2026/27 budget;
- A Transformation & Innovation portfolio containing a number of strategic programmes has been established as described more fully in section 6 and Appendix 3. These programmes will use the Innovation Fund to strategically address areas of pressure and to exploit commercial opportunities which will help transform the council into a financially sustainable organisation by the end of the MTFS;

- An Asset Management Strategy has been developed, which both identifies capital disposals to support the Innovation Fund and Transformation programmes, and which can contribute to ongoing revenue savings via the reduction of the council's property portfolios;
- A benchmarking exercise has been undertaken across the organisation to identify areas for further investigation. This work has been taken into account in both identifying savings proposals and transformation opportunities;
- Directorate Leadership Teams (DLTs) have rigorously reviewed service areas for efficiencies and savings, taking into account transformation programmes and service benchmarking.

5.10 Appendix 1 provides detailed draft budget proposals that have arisen thus far from the work described above.

5.11 A portfolio of strategic programmes (see section 6 and Appendix 3) is being developed that underpins the Council's financial sustainability. It is really important that the Council develops medium and longer term plans to improve efficiency and reduce demand as these programmes take time to implement successfully. They will also lead to better outcomes than short term budget cuts. This will focus on the following:

- Areas of the most significant demand pressures that the Council is facing – emergency and temporary accommodation, adults social care and children's social care. These programmes will focus on preventative work to reduce the need for statutory services, as well as work on things like increasing the supply of temporary accommodation at more affordable rates, and managing the adults and social care markets.
- Organisational transformation – this will focus on improving the Council's use of operational assets and reducing the associated revenue costs, a digital strategic programme to improve efficiency and reduce demand, as well as making savings through better procurement and contract management.
- Commercialisation – there are considerable opportunities to increase income across the city, for example through activating the Council's seafront assets, increasing income through advertising, as well as maximising fees and charges across our services.

5.12 A summary of the savings already identified from all the workstreams outlined above are set out below. While significant progress has been made, there is still a substantial gap between the potential savings from these programmes and workstreams and the MTFS gap.

Table 5: Savings & Transformation Plans

	2026/27	2027/28	2028/29	2029/30
	£m	£m	£m	£m
Changes in Delivery Models	0.300	0.200	0.000	0.000
Procurement & contract management efficiencies	0.204	0.317	0.450	0.650
Transformation Programme: Adult Social Care	8.892	4.150	2.900	1.850
Transformation Programme: Homes & Homelessness	4.843	0.664	0.304	0.000
Transformation Programme: Children's Services	0.971	1.386	1.207	1.059
Transformation Programme: Income & Commercialisation	1.305	1.087	1.860	0.260

Other Income & Commercialisation Initiatives	0.160	0.100	0.200	0.000
Digital & Innovation Initiatives	0.030	0.105	0.100	0.100
Service Redesigns and Functional Alignments	0.704	0.255	0.305	0.120
Reduction or reprovision of non-statutory services	0.830	0.199	0.199	
Efficiencies in delivering services	0.284	0.018	0.018	0.018
Other new funding sources or repurposing	0.491	0.366	0.382	0.102
Asset Management Strategy	0.775	0.088	0.000	0.000
Corporate Landlord and Net Zero Programme	0.320	0.140	0.100	0.100
Less: proposals that will reduce pressures already accounted for within the budget gap	(7.663)	0.000	0.000	0.000
Total net savings & transformation proposals	**12.446**	**9.075**	**8.025**	**4.259**
Budget Gap in each year	24.926	23.020	22.368	16.344
Remaining budget gaps	**12.481**	**13.945**	**14.343**	**12.085**

5.13 The February Report will provide a full MTFS and directorate Budget Strategies which will indicate the overall direction of travel for the delivery of services in each directorate and set out each directorate's approach to supporting Council Plan priorities.

6 The Innovation Fund & Transformation Programmes

6.1 Achieving transformation and change often involves significant one-off costs that cannot be afforded from revenue and cannot normally be funded by capital receipts or borrowing, for example, redundancy costs or project and programme management staffing. The government has extended the ability of all Local Authorities to use capital receipts to support the transformation of services to deliver savings and efficiencies (known as the Flexible Use of Capital Receipts) to March 2030.

6.2 The 2025/26 Budget approved in February 2025 included a four-year Innovation Fund to 2028/29 with a total investment need of £20 million to support the transformation and change of services and invest-to-save proposals over the period of the MTFS.

6.3 The officer-led Savings & Innovation Delivery Board and the Corporate Leadership Team have designed a Transformation & Innovation portfolio containing a number of strategic programmes. This approach will make use of the Innovation Fund to strategically prioritise one off resources towards addressing the budget shortfalls across the MTFS. The overarching strategic programmes are outlined in more detail in Appendix 3. To summarise the strategic aims, the programmes are intended to:

- address areas of high demand, implementing strategies to reduce demand through investing in prevention and reducing the cost of delivery;
- review delivery models for services across the council to ensure the most effective and efficient models are being used
- explore the use of Digital Innovation & technology to enhance and transform service delivery;
- review and maximise the use of assets across the council, primarily it's property portfolio;

- explore opportunities to increase revenue income and reduce the cost of delivering services.

6.4 It is likely that to balance the council's MTFS, the council will further need to take advantage of the ability to fund transformation through the Flexible Use of Capital Receipts to support the MTFS over the four-year period to 2029/30. Therefore, it is recommended that Cabinet approve the Innovation Fund to be extended into 2029/30 on the same basis as 2028/29. In addition, to support the transformation activity across the council, the fund is recommended to be increased to 28.140m in total to 2029/30, which is an increase of £8.140m compared to the current fund commitment of £20.000m to 31 March 2029. This increase recognises that the fund will need to continue for an additional year to 31 March 2030, as well as increase in overall value per year to support the scale of the change necessary for the Council to become a financial sustainable organisation.

6.5 The indicative Innovation Fund, including the use in the current financial year, is shown in Table 6 below:

Table 6: Indicative Innovation Fund

Category of Investment	2025/26	2026/27	2027/28	2028/29	2029/30
	£m	£m	£m	£m	£m
Transformation & Innovation strategic programmes	1.200	3.300	1.400	0.700	0.700
Invest-to-Save business cases	1.600	0.600	0.200	0.200	0.200
Digital and AI Development	1.906	1.550	1.550	1.550	1.550
Managing Staffing Changes (exit packages)	1.250	1.250	0.500	0.500	0.500
Enabling Resources (e.g Project Officers, Workstyles Team, HR etc)	1.030	1.226	1.226	1.226	1.226
Total	**6.986**	**7.926**	**4.876**	**4.176**	**4.176**

6.6 The investments are described in outline below:

- **Transformation & Innovation strategic programmes:** Described further in 6.3 and Appendix 3, a Transformation & Innovation portfolio has been established to address the council's budget gap across the MTFS strategically. The strategic programmes within it will require one off funding of resources and technology to enable the delivery of savings across the MTFS. It is currently estimated that a total of £7.3m is required across the period, which is likely to be front-loaded to maximise the savings across the MTFS.
- **Invest-to-Save Business Cases:** The medium-term planning process encourages innovation and invest-to-save business cases aimed at complementing the council's Transformation & Innovation portfolio, supporting the achievement of Council Plan priorities and, importantly, contributing to the future financial sustainability of the council. Business cases will need to demonstrate a return on investment within a reasonable time period (max 5 years) but ideally within the 4-year medium-term financial plan period.
- **Digital and AI Development & Skills:** Digital and AI is a specific form of invest-to-save. The council has already invested heavily in staff, systems and technologies to provide improved digital and on-line services. However,

this process does not stop and as technologies, including AI and robotics, improve and develop, the council will need to move with the technology and ensure appropriate skills are developed to make the most of any investment. Provision of at least £1.550 million each year is included but some of this cost could potentially be transferred to revenue in later years if this is affordable within the overall budget envelope.

- **Managing Staffing Changes:** Transformation and change inevitably results in significant changes to services which will entail changes to the mix or level of staffing in services. This can lead to potential redundancies which the council attempts to manage through holding vacancies or redeployment as far as possible, but otherwise through voluntary severance where this meets the council's business case criteria. This can involve significant redundancy and/or pension strain costs. At least £4.0 million is expected to be required over the period.
- **Transformation Enabling Resources:** Ensuring that transformation and change can be delivered requires resources that can be flexibly deployed across different programmes or to ongoing long-term change programmes. Informed by previous experience, the Innovation Fund provides resources of £1.226m per annum to support a wide variety of transformation, change and savings programmes and projects. This will need to be reviewed as future budgets are developed and the level of support for each change proposal is fully understood. The costs are broadly expected to cover the following:

Table 7: Transformation Enabling – Recurrent Annual Costs	
Category of Investment	**Annual Cost**
	£m
Project & Programme Management Resources	0.766
Workstyles Resources (to rationalise operational buildings)	0.180
HR Management of Change Support	0.128
Leadership Development	0.052
Finance Support	0.100
Total	**1.226**

7 Capital Strategy and Capital Investment Programme

7.1 The detailed capital strategy and capital investment programme will be brought to the February Cabinet & Budget Council as part of the budget report. Many the Council's capital investment plans fall within longer-term programmes to support Council Plan priorities.

A Fair & Inclusive City:

- New Homes for Neighborhoods and Home Purchase Scheme;
- Purchase of and investment in new units for Temporary Accommodation.
- Investment in new build housing through the Housing Revenue Account and Housing Joint Venture (with Hyde Housing);
- Investment in maintaining and improving the Council Housing Stock and building safety through the Housing Revenue Account.

- The Strategic Investment Fund (SIF) provides project support for major regeneration programmes that draw in substantial private sector investment.

A Healthy City where People Thrive:

- Investment in a new leisure centre at King Alfred site;
- Investment in other leisure facilities such as the Withdean Sports Complex swimming pool and 3G pitches at Moulsecoomb and Hove Park;
- The Education capital programme, which provides investment from central government including New Pupil Places, Education Capital Maintenance and Devolved Formula Capital for schools;
- Disabled Facilities Grant funded adaptations to support independence at home.

A City to be Proud of:

- Renovation and restoration of the Madeira Terraces;
- Development of Valley Gardens Phase III;
- The Local Transport Plan (LTP) covering a wide range of transport-related schemes;
- Significant investment in coast protection programmes such as the Brighton marina to River Adur scheme;

A Responsive and Learning Council with Well-run Services:

- The Information Technology & Digital Investment Fund to maintain and upgrade the council's infrastructure and IT architecture;
- The Corporate Systems Improvement (CSI) Programme to improve the council's core HR, Payroll, Finance & Purchasing systems and associated applications;
- The Asset Management Fund (AMF) to maintain operational buildings, improve sustainability and reduce long-term maintenance costs;
- Corporate Planned Maintenance (PMB) to undertake planned building works and upgrades;
- Vehicle and plant annual replacement programmes.

7.2 Investment options and requirements are kept under review, and any new programmes will come forward to February Cabinet meeting subject to the affordability of financing options, viable outline business cases, or available capital resources including capital receipts. The council's financial position requires continual review in terms of affordability, particularly where schemes are financed from borrowing.

Capital Receipts

7.3 Capital receipts from the sale of surplus land and buildings support the capital programme and the Innovation Fund and the projections are regularly reviewed. The Asset Management Strategy and Capital Asset Strategy seek to review both the Council's commercial property portfolio and the operational portfolio to dispose of properties to support the capital programme and Innovation Fund over the medium term and to streamline the cost of managing property estates.

7.4 Capital receipts are under severe pressure due to competing demands for the resources and the certainty and speed with which capital receipts can be realised. Additional staff resources have been deployed in Property and Legal services to support the delivery of these capital receipts. In addition to the Innovation fund, capital receipts are committed to annual investment funds including the Asset Management fund, Strategic Investment Fund and the Commercial Asset Investment fund as well as commitments within already approved capital schemes.

7.5 The table below reflects agreed capital disposals and commitments against the receipts. Capital Receipt commitments include existing and approved capital schemes together with an assumed minimum investment in the Innovation Fund of £28.140 million (see Section 6). The table shows a shortfall in net capital receipts over the MTFS of £30.2 million. Further options to meet this resource requirement through either additional capital receipts or reduced commitments will be presented to Cabinet in due course.

Table 8: Capital Strategy & Capital Receipts	**Year 1**	**Year 2**	**Year 3**	**Year 4**	**Year 5**
	2025/26 £'m	**2026/27 £'m**	**2027/28 £'m**	**2028/29 £'m**	**2029/30 £'m**
Brought forward balance	0.189	(6.586)	(10.425)	(19.488)	(23.769)
Expected Capital Receipts	**12.912**	**10.445**	**4.223**	**2.201**	**0**
Innovation Fund (Table 6)	(6.986)	(7.926)	(4.876)	(4.176)	(4.176)
Investment in Temporary Accommodation		(4.000)	(6.000)		
Other Capital Programme commitments	(12.701)	(2.358)	(2.410)	(2.306)	(2.250)
Carry forward balance (deficit)	**(6.586)**	**(10.425)**	**(19.488)**	**(23.769)**	**(30.195)**

8 Reserves Position and One-off resources

Review of Reserves and Provisions

8.1 A one-off review of reserves and provisions has been undertaken during November. This is annual exercise, but has been carried out earlier in the year than previous years as a result of recovery measures being implemented to address the 2025/26 forecast outturn overspend.

8.2 Reserves and balances have been reviewed to identify balances that can either be released, or held as part of a general risk reserve rather than as individual earmarked balanced. This exercise has identified £1.041m of earmarked balances that is recommended for release to a newly created General Risk Reserve. Table 9 lists the reserves recommended for release:

Table 9: Reserve or Provision	**Amount to be Released £'000**	**Rationale for release**
Section 106 Interest Reserve	6	Unrequired residual balance
Legacy LEP funds Revenue Reserve	4	Unrequired residual balance
Winter Maintenance Reserve	540	Pool with other risks under a general risk reserve
East Brighton Parking Surplus Reserve	70	Release of reserves following agreement to un-ringfence surpluses

Preston Park Parking Surplus Reserve	275	Transport & Sustainability committee (6 Feb 2024)
Cemeteries Maintenance Reserve	65	Pool with other risks under a general risk reserve
Insurance Provision	81	Change to reflect revised bi-annual actuarial review
Total Reserves & Provisions to be released	**1,041**	

8.3 A further review will be undertaken before the February budget report, and any further changes will be reported to Cabinet in February.

Latest Financial Performance in 2025/26

8.4 The forecast outturn position in the current year is important because it affects the availability of one-off resources. A projected underspend adds to the one-off resources available while a projected overspend will need to be funded from one-off resources or carried forward to the next financial year, adding to the financial challenge.

8.5 In-year financial performance is monitored through the council's Targeted Budget Management (TBM) framework and the TBM Month 7 (October) report elsewhere on the agenda shows a projected year-end General Fund overspend of £7.776m. The overall overspend has reduced by £1.630m since TBM Month 5. A one-off risk provision of £1.747m is not included within this forecast. Therefore the TBM forecast needs to improve by at least £6.029m by the end of the current financial year in order for reserves to remain intact and not be drawn down to support the 2025/26 overspend.

8.6 The council's share of the net deficit on the Council Tax and Business Rates collection funds, after allowing for Section 31 grant, is forecast to be £1.764m and must also be funded from one-off resources in the 2026/27 budget.

8.7 Table 10 summarises the potential resources and liabilities that will need to be taken into account in setting the 2026/27 budget. At this stage, this assumes that spending in 2026/27 will be in line with the TBM Month 7 (October) report projections included elsewhere on this agenda.

8.8 The table shows an estimated shortfall in one-off resources of £1.764m after taking account of other expected one-off requirements. This position is expected to change and will be updated for the February budget report. The main factor expected to affect the position is the latest TBM position which will be updated for month 9 (December). As described in paragraph 8.5, the call on one off resources assumes that the TBM forecast for 2025/26 will improve by at least £6.029m, and therefore there is a risk that the need for one off resources will increase.

8.9 Additionally, a further review of in-year Collection Fund (tax yield) performance will take place in TBM Month 9. Any improvement will reduce the call on one-off resources and vice versa.

Table 10: Projected One-Off resources	**£m**	**£m**
Revenue Budget position 2025/26 (TBM):		
- Forecast outturn overspend (Month 7/October)	**-7.776**	
- Application of one-off risk provision	1.747	
- Estimated improvement due to recruitment & spending controls	6.029	
Estimated 2025/26 Outturn		**-0.000**

Collection Fund position 2025/26:		
- Estimated 2025/26 Council Tax collection fund net deficit	- 1.195	
- Estimated 2025/26 Business Rates Retention collection fund position	-1.137	
- Contribution from Section 31 grant timing reserve	0.568	
Sub-total: Projected Collection Funds position		**-1.764**
Shortfall before allocations		**-1.764**
Current One-off Resources Shortfall		**-1.764**

8.10 The table above indicates an estimated call on one-off resources of £1.764m. The February budget report will need to identify resources to fund this requirement.

8.11 There is a significant risk around the TBM position, with an assumption that the current spending and recruitment controls and directorate financial recovery plans will improve the forecast outturn position for 2025/26 by at least £6.029m. As highlighted elsewhere in this report and previous reports, the council's level of available reserves and balances is very low, and therefore the need for one off resources of this level potentially places the authority at serious risk of requiring Exceptional Financial Support if the estimates of the one-off resources and the forecast for 2025/26 required do no improve significantly.

8.12 As indicated above, there are a number of factors that can affect a change to these figures. Further work is also needed to fully understand one-off pressures and consider options for mitigating some of these costs and whether any appropriate temporary funding mechanisms are available to support the one-off costs expected for 2026/27.

9 Staffing Implications (General Fund)

9.1 At this stage, the first draft budget proposals indicate that 11.7 full time equivalent (fte) posts could be deleted from the council's staffing structure, which is approximately 0.32% of total staffing. Whilst a number of these posts will be vacant during 2025/26, some proposals may initially result in some staff being placed at risk of redundancy. This is difficult to estimate with any certainty, but approximately 2.8 fte staff (not headcount) have been potentially identified at risk at this stage if budget proposals are agreed. The proposals currently have no TUPE implications for staff. This information was shared with the council's recognised trade unions and the staff affected in advance of the release of this report.

9.2 As in previous years, actual numbers of staff affected will be highly dependent on the detailed options proposed, further savings proposals coming forward in the February report and on the outcome of formal consultation with staff and unions which will often lead to changes to the original proposals. As previously experienced, it is likely that any reductions in posts will be resolved through normal turnover, or through redeployment to other vacancies across the council, thereby minimising the risk of redundancies as far as possible.

9.3 If the proposals do potentially place any staff at risk of redundancy the council will support them by:

- Providing appropriate support to staff throughout the change process to enable them to maximise any opportunities available;
- Controlling recruitment and ensuring there is a clear business case for any recruitment activity;
- Managing redeployment at a corporate level and maximising the opportunities for movement across the organisation;
- Managing the use of temporary or agency resources via regular reports to Directorate Leadership Teams (DLT's);
- Inviting applications for voluntary severance where appropriate to staff affected by budget proposals, subject to viability and approval on a case by case basis.

9.4 These measures will remain in place as consultation with trade unions, staff and other stakeholders is undertaken. Where necessary, a targeted voluntary approach to releasing staff in areas undergoing change will be managed to support service redesigns whilst ensuring that the organisation retains the skills that will be needed for the future.

10 Housing Revenue Account (HRA) Budget & Capital Programme

10.1 This report is primarily concerned with the development of the General Fund revenue and capital budget. However, there are links to the Housing Revenue Account (Council Housing) revenue budget and capital programme which follow a separate budget setting process. Summary information is provided below.

10.2 The Housing Revenue Account is a ring-fenced fund dedicated to the management and maintenance of the council's housing stock. Legislation requires the HRA to remain balanced; the council must demonstrate that projected income will cover planned expenditure, thereby ensuring the account's long-term viability.

10.3 The prevailing economic climate and operational challenges continue to place considerable strain on HRA resources for 2025/26. Consistent with trends across the sector, our authority faces increasing financial pressures. The latest Medium Term Financial Strategy forecasts a deficit for the HRA over the next 5 years. Contributing factors include a rising number and cost of disrepair claims, significant investment requirements to comply with the Building Safety Act, Fire Safety Regulations, and the Social Housing Regulation Bill, alongside the as the impact of inflation on services and financing costs.

10.4 A particular ongoing challenge is the investment required in 8 Large Panel System (LPS) high-rise blocks across the city. While a staggered investment approach was initially planned, the need to maintain short to medium term safety standards now necessitates immediate and substantial revenue investment. In 2025/26, temporary fire safety measures, such as 'waking watch' arrangements, have been introduced at several high-rise blocks. Longer-term options for these LPS blocks are under review, with associated capital investments to be included in future budget proposals when cost estimates are sufficiently robust.

10.5 Recent announcements from central government have introduced a long-term rent policy, enabling social landlords to increase rents by CPI+1% annually for the next decade, with further consultation on rent convergence. The current Medium Term Financial Strategy assumed this increase for only five years; as

such, the extension to ten years should enhance the HRA's financial sustainability over the long term.

10.6 The HRA capital programme focuses on two principal areas: improving the quality, safety, and energy efficiency of existing council homes, and expanding the supply of affordable housing. Investment in the existing stock is primarily funded through tenants' rents (including related rent rebates) and HRA borrowing, both supported by rental income over time. In contrast, new supply is largely financed by retained capital receipts (including those from Right to Buy sales and commuted sums), grant funding, and further HRA borrowing.

10.7 The capital investment strategy for 2026/27 to 2030/31 will be informed by the latest stock condition surveys and the council's Asset Management Strategy, taking into account emerging priorities. Key objectives include enhancing home safety and quality, ensuring compliance with statutory regulations, and working collaboratively with stakeholders such as the Regulator of Social Housing, East Sussex Fire and Rescue Service, tenants, and leaseholders to shape our planned works. In addition, ongoing investment in carbon reduction initiatives will underpin the council's commitment to achieving carbon neutrality by 2030.

10.8 To increase the delivery of affordable council homes, the HRA is progressing a range of initiatives, including the New Homes for Neighborhoods Programme, the Home Purchase Scheme, the Converting Spaces initiative, and the Homes for the City of Brighton & Hove Joint Venture. These programs are designed to ensure that newly delivered homes generate a surplus, thereby supporting the sustainable funding of ongoing maintenance and repairs.

10.9 Throughout 2026/27, efforts will continue to develop the housing supply pipeline. The Home Purchase Scheme will seek opportunities to repurchase former council properties sold under Right to Buy, while the extended scheme will pursue 'off the shelf' acquisitions to further expand the affordable housing portfolio within the HRA.

10.10 The Housing Revenue Account budget and business plan will be reported to Cabinet for approval in February 2026.

11 Schools Budgets and Funding

11.1 The Dedicated Schools Grant (DSG) is a ring-fenced grant that provides funding for Schools, Academies, Early Years, Special Educational Needs and a small number of allowable Central items. The DSG is allocated to schools and academies on the basis of a National Funding Formula (NFF) primarily driven by pupil numbers.

11.2 The DSG is divided into four blocks – the Schools Block, the High Needs Block (HNB), the Central School Services Block and the Early Years Block. Each of the four blocks of the DSG are determined by separate national funding formulae (NFF).

11.3 In a similar way to the HRA, the development and setting of schools' budgets follows a separate process involving statutory consultation and oversight of the Schools Forum. However, there are links with the General Fund budget setting process as General Fund budget proposals and savings can potentially impact schools and vice versa.

11.4 Detailed announcements and full allocations regarding the 2026/27 DSG will not be published by Government until mid-December 2025. However, in November 2025, the Department for Education (DfE) published provisional

funding allocations for mainstream schools and local authorities in 2026/27 through the schools and central school services NFFs.

11.5 Provisional funding for mainstream schools through the schools NFF will total £50.9 billion in 2026/27. To simplify the funding system, the 2026/27 schools NFF will include funding for pay and national insurance contributions costs that were previously allocated separately.

11.6 On top of this rolled-in funding, the core factor values in the 2026/27 schools NFF are rising by 2.1%, to increase the funding available to schools. However, as funding to schools is pupil-led, schools with falling rolls will continue to be in a very challenging financial position next financial year. This is in the context of unavoidable cost pressures such as 2026/27 pay awards that are likely to absorb the benefit of the 2.1% funding uplifts.

11.7 Local authorities will continue to be responsible for operating local funding formulae, which will determine the funding that individual schools and academies in their area receive. To support moves to a more consistent funding system, DfE will continue to require those local authorities which are not already "mirroring" the NFF in their local formulae to move closer to the NFF. Brighton and Hove is not currently "mirroring" the NFF and it has been agreed with Schools Forum that local formulae will move 30% closer to the NFF rates in 2026/27.

11.8 The central school services block funds local authorities for the ongoing responsibilities they continue to have for all schools, and some historic spending commitments that local authorities face. The central school services NFF for 2026/27 includes funding for pay and national insurance contributions costs that were previously allocated outside the NFF.

11.9 Full allocations of schools and central school services funding for 2026/27 will be published in December, taking account of the latest pupil data at that point. The publication of 2026/27 high needs block and early years block allocations will also follow by the end of the year.

Updated School Balances Position

11.10 Detailed information relating to the latest school and central DSG balances was contained in the July 2025 budget report, however the most recent school balances position is summarised below:

Table 11: Schools Balances	**Nursery £'000**	**Primary £'000**	**Secondary £'000**	**Special £'000**	**Total £'000**
Final 2023/24 balances	24	(1,143)	2,048	(648)	281
Final 2024/25 balances	163	(2,665)	(395)	274	(2,623)
Movement	**139**	**(1,522)**	**(2,443)**	**922**	**(2,904)**

11.11 At the end of the 2024/25 financial year school balances for maintained schools within the council showed a net deficit position of £2.623m. The net deficit is expected to increase further in 2025/26, with a forecast year-end net deficit in the region of £5.7m. School deficits is an increasing challenge in Brighton and Hove, and active engagement is taking place with schools to address these deficits.

12 Analysis & Consideration of any alternative options

12.1 The setting of the General Fund budget in February allows all parties to engage in the examination of budget proposals and put forward viable

alternative budget and council tax proposals, including amendments, to Budget Council on 26 February 2026. Budget Council has the opportunity to debate the proposals put forward by the Cabinet at the same time as any viable alternative proposals.

13 Community Engagement & Consultation

13.1 This report will be shared widely with key stakeholders and partners as it signals to all parties the anticipated financial challenge facing the council for next year and beyond, notwithstanding the imperfect funding information available at this stage.

13.2 The development of the council's budget and future plans is a major undertaking and proposals can affect a wide range of services and therefore have impacts on residents, businesses, visitors and staff. Appropriate and necessary statutory consultation and engagement will be undertaken with residents, service users, staff, unions, partners, business representatives and the community and voluntary sector.

13.3 Detailed consultation and engagement plans will start over coming weeks, in advance of any proposals coming forward for Cabinet in February 2025 for full Council approval. However, consultation and engagement is expected to include the following:

General Information

13.4 General information and advice about the council's budget will continue to be provided through the council's website which provides information and infographics on how money is spent on services, where the money comes from, the council's capital and transformation investment plans, and a summary of the financial challenges ahead. These materials will continue to be promoted through various media and communications throughout the budget setting period.

Engagement on the draft budget

13.5 The Council's overarching budget proposals will be published through a range of channels to ensure that residents and community groups have an opportunity to comment on these, and for this feedback to be considered in the final budget report to Cabinet in February 2025.

City Partners

13.6 Information will also be shared with City Partners through the City Management Board and other channels. In particular, the council continues to engage fully with the NHS Sussex Integrated Care System to ensure that the budget processes of the two organisations are aligned and communicated as far as practicably possible.

Business Engagement

13.7 There is ongoing liaison and discussion with the Economic Partnership that covers potential funding sources and bids, city regeneration, economic growth, employment and apprenticeship strategies. Officers of the council and members of the Administration meet periodically with representatives of the Chamber of Commerce and B&H Economic Partnership to discuss the council's high-level plans and over-arching budget situation. Formal consultation will also take place with business rate payers in line with statutory guidance.

Schools Community

13.8 The Schools Forum, a consultative body attended by representatives of all school phases, will primarily focus on the allocation of the ring-fenced Dedicated Schools Grant (DSG) funding across the relevant budget 'blocks' but will also be periodically informed about the General Fund budget position and proposed changes to council services where these may have implications for schools. Engagement with the schools forum will take place in January.

Third Sector Engagement

13.9 A key stakeholder is the Community & Voluntary Sector, and communications and meetings with representatives of the sector are planned to provide an opportunity to feedback views to the council and members which will inform final budget proposals. The Council funds lots of activity within the voluntary and community sector, through the Thriving Communities Fund, the Household Support Fund (which will become the Crisis and Resilience Fund in 2026/27) and the Fairness Fund. Crisis and Resilience Fund allocations have not yet been announced by government, plans for voluntary and community sector funding will be finalised once these allocations are clear.

Staff and Union Engagement

13.10 Consultation and engagement with staff and unions is also very important. The scale of financial challenge indicates further significant impacts on the configuration and/or provision of services which will inevitably entail staffing changes. Meetings with the council's recognised unions, including appropriate officers and members of the Administration, will be scheduled regularly to keep unions abreast of developing proposals and to ensure they have sight of where support to their memberships may be required. The council's Joint Staff Consultation Forum will continue to provide a formal setting for sharing and raising matters relating to the overall budget process and development.

13.11 Detailed proposals have been shared with Departmental Consultative Groups (DCGs) and through line management. Formal consultation and engagement with directly affected staff will be undertaken as normal, including relevant union representation, under the council's Organisation Change Management Framework.

Specific Consultation

13.12 It is recognised that specific consultation will be required for individual proposals. CLT and DLTs will lead on this engagement where there are changes to service delivery models or changes to policy frameworks that underpin how we provide services to residents and businesses.

Timetable

13.13 The timetable for final budget proposals is given in the table below. This timetable does not include detailed plans for ongoing consultation with stakeholders as this will be determined in conjunction with those involved.

Table 12: Budget Timetable

Date	Event	Notes
3 Dec 2025	Publication	Publication of Draft Budget proposals on the council's web site
11 Dec 2025	Cabinet	Draft Budget & Resource Update report; Budget Monitoring (TBM) month 7 report.

Dec to early-Jan	Development of further budget proposals	Further work and refinement of draft budget proposals incorporating the impact of the Provisional Local Government Financial Settlement
w/c 15 Dec	Provisional Local Government Financial Settlement	Receipt and analysis of the provisional settlement expected before Parliament recess for Christmas (18 December 2025)
Jan 2026	CFO/HR/Unions	Further sharing of any additional budget proposals affecting staff
19 Jan 2026	Joint Overview and Scrutiny committee	Draft Budget & Resource Update report: presented at both Place & People Overview and Scrutiny Committees
22 Jan 2026	Cabinet	Council Tax Base report; Business Rates tax base report.
By 3 Feb 2026	Department Consultative Group's	Sharing overall final budget package and staffing impacts (assuming publication on 4 Feb)
4 Feb 2026	Publication	Publication of Final Budget proposals on the council's web site
12 Feb 2026	Cabinet	General Fund and HRA Revenue & Capital Budget reports; TBM month 9 report.
26 Feb 2026	Budget Council	General Fund and HRA Revenue & Capital Budget reports.

14 Financial Implications:

14.1 The financial implications are contained in the body and appendices of this report.

Finance Officer consulted: Haley Woollard Date: 02/12/25

15 Legal Implications:

15.1 The process of formulating a plan or strategy for the council's revenue and capital budgets falls within the Allocation of Responsibilities for Functions for the Cabinet under Part 2E of the constitution.

15.2 This report complies with the Council's process for developing the budget framework, in accordance with the Council's Budget and Policy Framework Procedure Rules as set out in Part 3D of the Constitution.

Lawyer consulted: Elizabeth Culbert Date: 01/12/25

16 Risk Implications

16.1 There are a range of risks relating to the council's short and medium term budget strategy including the ongoing economic impact of the higher inflationary environment, the impact of the cost-of-living crisis, further potential reductions in grant funding, the impact of legislative changes, and/or other changes in demands. The budget process will normally include recognition of these risks and identify potential options for their mitigation. In the current financial climate, the level of risk that the council may be prepared to carry is likely to be higher than in normal circumstances.

17 Equalities Implications:

17.1 The Council's well-established screening process to develop Equality Impact Assessments (EIAs) has been used to assess the impact of significant budget changes included within the proposals in Appendix 1. Draft EIAs have been included in Appendix 4. Key stakeholders and groups will continue to be engaged as final EIAs are developed but it will also be important to consider how members, partners, staff and unions can be kept informed of EIA development and the screening process. In addition, where possible and proportionate to the decision being taken, there may be a need to assess the cumulative impact of the council's decision-making on individuals and groups affected in the light of funding pressures across the public and/or third sectors. The process will ensure that consideration is given to the economic impact of proposals.

18 Sustainability Implications

18.1 The council's revenue and capital budgets will be developed with sustainability as an important consideration to ensure that, wherever possible, proposals can contribute to reducing environmental impacts and support progress toward a carbon-neutral city.

19 Health and Well-being Implications

19.1 The council's budget includes very substantial provision for expenditure on Adult and Children's Social Care, Public Health, Housing and Homelessness, Welfare Assistance (for example the Council Tax Reduction Scheme), Education and Skills, and many other essential services that support vulnerable people and children, and households on low incomes or experiencing homelessness. These services contribute significantly to the health and well-being of thousands of residents and the wider population, upholding the council's priority to support 'A healthy city where people thrive' and engender 'A fair and inclusive city'.

20 Conclusion

20.1 The council is under a statutory duty to set its budget and council tax before 11 March each year. This report sets out the latest budget assumptions, process and timetable to meet the statutory duty. The Provisional Local Government Finance Settlement is due to be announced week commencing 15 December 2025, which will provide the certainty for the final envelope of resources that the Council will receive for the three year period to 2028/29, which will provide the basis of the final MTFS which comes to Cabinet and Budget Council in February 2025. The current set of budget proposals do not fully address the Budget Gap in either 2026/27 or across the MTFS, and therefore further options are being explored for the February report. If sufficient proposals cannot be found or agreed, then the Council is at risk of needing to seek Exceptional Financial Support from government in order to produce a legally balanced budget for 2026/27.

Supporting Documentation

Appendices:

1. Detailed savings 2026/27
2. Core Planning Assumptions
3. Transformation Programmes & Innovation Fund

4. Equality Impact Assessments for budget proposals
5. Review of Reserves and Provisions

2026/27 Detailed Draft Savings proposals **Appendix 1**

Unit	Total Savings Proposed 2026/27 £'000	Total FTE 2026/27	Total 2026/27 FTE Deleted
Education & Learning	229	183.2	0.0
Family Help & Protection	701	531.9	3.6
Commissioning & Communities	279	161.4	0.0
Public Health	0	65.1	0.0
Families, Children & Wellbeing Total	**1,209**	**941.6**	**3.6**
Adult Social Care	2,296	589.2	0.0
Commissioning & Partnerships	0	59.3	0.0
Housing People Services	5,143	130.6	0.0
Homes & Investment	0	47.9	0.0
Homes & Adult Social Care Total	**7,439**	**827.0**	**0.0**
City Infrastructure	280	313.9	1.0
Environment & Culture	425	227.7	0.0
Environmental Services	755	435.6	0.0
Place	180	91.6	0.0
Digital Innovation	42	122.7	0.0
City Operations Total	**1,682**	**1,191.5**	**1.0**
Cabinet Office	50	20.1	0.0
Corporate Leadership Office	0	13.1	0.0
Finance & Property	806	284.4	0.0
Governance & Law	152	99.9	1.0
People & Innovation	858	198.3	6.1
Contribution to Orbis	250	28.6	0.0
Central Hub Total	**2,116**	**644.4**	**7.1**
Centrally-held Budgets Total	**0**	**0.0**	**0.0**
Grand Total	**12,446**	**3,604.5**	**11.7**

Families, Children & Wellbeing

Section / Service Area	Brief Summary of Budget Proposal / Strategy and Risks	Total Savings Proposed 2026/27
		£'000
Families, Children & Wellbeing **Education & Learning**		
Inclusion Support Service - Educational Psychology Service	Summary of proposal: Recurrent underspend within this cost centre. Delivery risk and impact: No risk or impact	**5**
Inclusion Support Service - School Mental Health Service	Summary of proposal: This service was originally introduced as a pilot on a one-off basis, but the council is now proposing to extend the service, to be funded from the Public Health Grant, which represents a saving to the General Fund budget. Delivery risk and impact: This funding may not be permanent, in which case, other funding would need to be found.	**200**
Early Years - Management of the Early Years service including council nurseries. Support for private and voluntary nurseries, childminders, out of school childcare, childcare workforce training, and management and administration of free early years entitlement for 2/3/4 year olds. Oversight of the Holiday Food and Activity Programme. Statutory duty to secure sufficient childcare places and information, advice and training to childcare providers and to complete an annual childcare sufficiency assessment. Early Years providers pay for most training courses.	Summary of proposal: A small element of the Early Years Central team (0.5FTE) will now be funded from the Dedicated Schools Grant. Delivery risk and impact: No risk as reallocation of funding to Early Years Block	**24**
Education & Learning Total		**229**
Family Help & Protection		
Fostering & Adoption - Payments to in-house carers for fostered and adopted children.	Summary of proposal: The budget for adoption allowances has been underspent for a number of years. Proposal is for a budget reprofile to align the budget with actual expected spend. No direct impact is expected for families.	**40**

Section / Service Area	Brief Summary of Budget Proposal / Strategy and Risks	Total Savings Proposed 2026/27
		£'000
	Delivery risk and impact: Risk is that demand for adoption allowances increases in future years.	
Social Work - Social work staffing teams.	Summary of proposal: Contribution to the CiC Mental Health contract. Plus saving in Front Door for Families (FDFF) Delivery risk and impact: Proposal is to fund this Sussex Partnership NHS Foundation Trust CiC Mental Health Service from the Public Health Grant for one year. A further decision will need to be made in future years on recurrent funding. Additionally, FDFF Referral Officer role would be reduced by 1 FTE. This role screens all contacts to FDFF. Contacts have reduced by 13%, therefore this reduction can be managed without impacting service performance in providing children safeguarding services to the city in a timely way. See EIA 1.	**141**
Social Work - Expenditure incurred under Section 17 & 18 of the 1989 Children Act.	Summary of proposal: Proposal is to fund Section 17 spend from the Household Support Fund. Delivery risk and impact: Proposal is to fund Section 17 spend from the Household Support Fund. This fund may not be permanent, in which case, other funding would need to be found, or there would be an impact on families.	**35**
Agency Placements - Residential, fostering and secure placements for looked after children provided by external agencies	Summary of proposal: Separated Children Psychology Contract to be offset by funding from City of Sanctuary Action Plan. No impact on service delivery anticipated Delivery risk and impact: Funding from City of Sanctuary reduces in the future and impacts on this service.	**40**
Adolescent Service - Support and supervision to young people at risk of exploitation, some of whom are at risk of becoming involved in the Criminal Justice System and preventative work for children and young people at risk of becoming involved in offending.	Summary of proposal: Extended Adolescence Service (EAS) post (currently vacant). Additionally, proposal to use the Public Health grant to fund part of the RUOK service.	**92**

Section / Service Area	Brief Summary of Budget Proposal / Strategy and Risks	Total Savings Proposed 2026/27
		£'000
	Delivery risk and impact: Less direct work support to vulnerable teenagers. Service aims to keep children out of care, the risk is that more children enter care as this service is depleted. This will be older children as EAS works with 11+, these placements tend to be more expensive and far more likely to be high cost residential. RUOK savings of £42k can be made through offsetting against Public Health funding. See EIA 2.	
Partners in Change Hub & specialist assessments - Lead practitioners and adult workers supporting social workers to manage risk effectively within families; specialist assessments to support social work decision making	Summary of proposal: Reduce Professional Education Consultant Service Delivery risk and impact: This 0.8 FTE role provides statutory support and assessment of newly qualified social workers. There has been a reduction in the number of newly qualified social workers recruited and therefore less support is needed. It will require that social workers take over some of the statutory assessment support for newly qualified social workers. This will impact of social work capacity. See EIA 3.	**56**
Family Hubs - The Family Hubs transformation completed in September 2024 with the new model in place to deliver support for children, young people and families.	Summary of proposal: Alternative funding sources (Young Futures and Best Start) for Early Help Services and Family Hubs. Further non-staffing efficiencies. Delivery risk and impact: Fund Service Manager post using Young Futures funding, which has no impact (£75k). Non staffing efficiencies has no impact (£37k). Fund 2 Family Hubs Support Worker (£80k) with Best Start funding to help meet DfE requirements.	**192**
Youth Services - Commissioned community and voluntary sector youth services provides a range of traditional youth services across the city, and include equality groups Internal council services – Youth Participation Team provide a range of services for children and young people who are/have	Summary of proposal: Reduce Youth Arts Officer vacant post 0.8FTE, and use of Young Futures Funding to support youth services. Delivery risk and impact: This would reduce the Youth Arts service to 0.4FTE remaining post, which means there will be a	**65**

Section / Service Area	Brief Summary of Budget Proposal / Strategy and Risks	Total Savings Proposed 2026/27
		£'000
been in care or receiving social work support; this includes youth advocacy, Children in Care Council. The service also provides wider participation activities, e.g. Youth Council, Youth Wise. The service also provides an accredited Youth Arts Programme	reduction in the opportunities for the most vulnerable children living in the city, including children in care, who are disengaged from education, to achieve a nationally accredited award and reintegrate them back into education, training or employment. See EIA 4.	
Services for children with disabilities - Management, assessment, operations and administration. Direct payments, Family support services and short breaks	Summary of proposal: Renegotiate contracts for services for children with disabilities to achieve efficiencies and improved value for money. No impact on service delivery anticipated Delivery risk and impact: High profile with parent carer community.	**40**
Family Help & Protection Total		**701**
Commissioning & Communities		
Violence Against Women & Girls (VAWG) Commissioning	Summary of proposal: Saving of £75k by reducing the funding for Pan Sussex posts associated with the Pan Sussex Domestic Abuse Board. The posts are line managed by West Sussex County Council and focus primarily on East and West Sussex engagement. Officers from Brighton & Hove will continue to be a member of the Board. This reduction in budget may mean that East and West Sussex County Councils will have to increase their contributions. Additional saving achieved as reciprocal funding work has reached completion, so there is no impact from this saving. Delivery risk and impact: Minimal impact on those who experience VAWG. See EIA 5. Reduction in funding for the Transformation Manager post at Stonewater Refuge. The project work of this post has now reached completion, so there is no impact from this saving.	**75**

Section / Service Area	Brief Summary of Budget Proposal / Strategy and Risks	Total Savings Proposed 2026/27
		£'000
Commissioning & Brokerage teams, School Traded Service Team and Home to School Transport	Summary of proposal: Due to a reduction in predicted numbers of pupils requiring home to school transport there will be reduction in overall costs. Delivery risk and impact: None	**204**
Commissioning & Communities Total		**279**
Families, Children & Wellbeing Total		**1,209**

Homes & Adult Social Care

Section / Service Area	Brief Summary of Budget Proposal / Strategy and Risks	Total Savings Proposed 2026/27 £'000
Homes & Adult Social Care **Adult Social Care**		
Community Care budget funding packages of care to meet statutory responsibilities across adult care groups including Learning Disability and Mental Health. Services include; community support, home care, supported accommodation, residential and nursing care. Physical Support & Sensory Support Memory & Cognition Support Mental Health Support Learning Disabilities 4,387 budgeted capacity for 2025/26	Summary of proposal: A new purpose-built accommodation ("Brickfields") for people living with physical disabilities and/or brain injuries. There are 28 apartments in total divided into flats and communal areas. The new accommodation will allow us to move people, where appropriate back to the city from more expensive accommodation. This is a positive development and may have the added benefit of bringing service users back to the city and closer to their families. Delivery risk and impact: Assumes an alternative delivery model is implemented and mobilisation of service is not significantly delayed. See EIA 6.	**300**
as above	Summary of proposal: Increased Community Reablement offer to support independence for individuals as an alternative or reduction in care & support needs Delivery risk and impact: None. See EIA 6.	**888**
as above	Summary of proposal: Reducing the demand for council run or council funded services by increasing signposting and redirecting of individuals at the first point of contact with the local authority. This will include utilising alternative offer such as community and voluntary provision in the city. Delivery risk and impact: None. See EIA 6.	**292**
as above	Summary of proposal: Continued focus on meeting care and support needs in alternative ways and in home settings, avoiding residential and nursing care placements. A particular focus on working age service users.	**816**

Section / Service Area	Brief Summary of Budget Proposal / Strategy and Risks	Total Savings Proposed 2026/27
		£'000
	Delivery risk and impact: None. See EIA 6.	
Adult Social Care Total		**2,296**
Housing People Services		
Temporary and Supported Accommodation - Temporary Accommodation	Summary of proposal: The budget for Temporary Accommodation is under severe financial pressure, with a forecast increase of £12m on the net General Fund. Four key workstreams are established, which will reduce the pressure, totalling £5.143m: • Increasing supply: of more affordable Temporary Accommodation (moving from spot to block-booked accommodation, exempt accommodation, EPC Grant Scheme and Council owned TA) • Full Cost Recovery: Maximising full cost recovery for Temporary Accommodation costs • Further improving effectiveness in prevention of homelessness: Reduce households placed in Temporary Accommodation with new Housing Advice Team. • Accelerating move on from Temporary Accommodation: direct offers of social housing to households in Interim Accommodation. Delivery risk and impact: Key risks include increasing demand for temporary accommodation, affordability constraints in the housing market and limited capacity in partner and support services to engage effectively in prevention work. These factors could impact the pace and sustainability of savings delivery and require close monitoring. See EIA 7.	5,143
Housing People Services Total		**5,143**
Homes & Adult Social Care Total		**7,439**

City Operations

Section / Service Area	Brief Summary of Budget Proposal / Strategy and Risks	Total Savings Proposed 2026/27
		£'000
City Operations **City Infrastructure**		
Transport Projects & Engineering	Summary of proposal: Maximising income through advertising, exploring efficiencies and new opportunities that align with public health priorities (such as sugary foods etc). The saving can be kept under review, and could be increased through monitoring and increasing volume of adverts. Delivery risk and impact: Not securing sufficient advertisers	**200**
Regulatory Services	Summary of proposal: Review of the team is to ensure there is greater join up and flexibility between functions, as well as joining up the provision of technical administrative support to the team. Delivery risk and impact: None	**80**
City Infrastructure Total		**280**
Environment & Culture		
Venues and Events	Summary of proposal: Expand the city's income from filming and weddings by enhancing the range of services offered. This would involve a minor investment in materials, enabling the council to charge higher fees for equipment hire. At present, only the venue is provided, which means the council is missing out on additional revenue opportunities from equipment and service hire. Ambition of increasing outdoor events income over the next 10 years, in line with the new events strategy. Delivery risk and impact: Small upfront cost to licence new venue for weddings and marketing these through a delivery partner. Income expected from summer 2026.	**10**

Section / Service Area	Brief Summary of Budget Proposal / Strategy and Risks	Total Savings Proposed 2026/27
		£'000
Venues and Events	Summary of proposal: The Brighton Centre is developing an unused area in the venue to develop a high value VIP and Hospitality space. Delivery risk and impact: Possibility of some disruption to events in the Brighton Centre whilst construction is ongoing. This will be carefully managed around the programme of events. If there is project slippage in terms of build/construction this could impact on the VIP/Hospitality area being completed by Quarter 2, which runs the risk of losing out on the potential to capture shows in Quarter 2 2026/27.	**100**
Sport and Leisure	Summary of proposal: Develop a strategy to generate new income streams from the council's sports and leisure services, responding to increasing demand across the city (for example, through activities such as Padel, and use of land/estate for other activities e.g. BMX track). Delivery risk and impact: This can only be surplus income over and above which has been assumed in the Withdean swimming pool business case. Dependent on staff to deliver pipeline of sites and expressions of interest. Requires a padel strategy to be drafted - 3 models: 1) we procure it, 2) we build/manage, 3) we build/run. Likely to be procured and we take hire fee and/or % whichever higher.	**50**
Sport and Leisure	Summary of proposal: Develop a comprehensive commercial activation strategy, led by the new Commercial Executive role, to unlock new revenue opportunities. This strategy will include a review of areas such as heritage assets, expressions of interest for Sheepcote Valley and City Parks, seafront activation including BlackRock meanwhile uses, pop-up concessions, beach huts, new sports initiatives, and activating heritage buildings/assets in cemeteries.	**250**

Section / Service Area	Brief Summary of Budget Proposal / Strategy and Risks	Total Savings Proposed 2026/27
		£'000
	Delivery risk and impact: Risk of not hitting the income targets through many new initiatives in a timely way. Dependent on market forces and the attractiveness of Brighton as a commercial destination for new activations.	
City Parks	Summary of proposal: Introduce parking charges at Victoria Park to generate additional income for the council. Delivery risk and impact: Potential for between £5-27K per annum. Cautious due to street parking issues. See EIA 8.	**5**
City Parks	Summary of proposal: Introduce additional car parking charges in city parks to generate new income streams for the council. Delivery risk and impact: To be explored and Outline Business Case for invest to save e.g. lower and upper Waterhall, Wild Park, Saunders Park, Rottingdean Recreation Ground, Happy Valley, Easthill Park to consider their potential. See EIA 8.	**10**
Environment & Culture Total		**425**
Environmental Services		
Strategy & Service Improvement	Summary of proposal: Introduce a fee for collection of waste from third sector organisations. Delivery risk and impact: Will require consultation to introduce a policy. Risk that the full year saving does not materialise, if the policy cannot be introduced in time. See EIA 9.	**50**
Strategy & Service Improvement	Summary of proposal: Introduce a charged for Christmas tree collection service Delivery risk and impact: None. See EIA 10.	**10**
Strategy & Service Improvement	Summary of proposal: Introduce a fee for customers requesting bin replacements, the council does not currently charge for this service, and this would provide residents the ability to purchase a new bin as and when they feel this is needed. If the bin is	**60**

Section / Service Area	Brief Summary of Budget Proposal / Strategy and Risks	Total Savings Proposed 2026/27
		£'000
	damaged by council operatives, the replacement would be at the council's cost, and as determined necessary for health & safety reasons. Delivery risk and impact: Risk that bins are not replaced, making collection potentially difficult. See EIA 10.	
Strategy & Service Improvement	Summary of proposal: Introduce a new bin cleaning service available to both residents and businesses throughout the city. Delivery risk and impact: Investment required for equipment. Conservative estimate. Full cost benefit analysis would be required. See EIA 10.	**20**
Strategy & Service Improvement	Summary of proposal: Introduce a commercial service to offer graffiti cleaning for a charge, making this service available both to other council departments and to external commercial clients. Delivery risk and impact: Investment required for equipment. Conservative estimate. Full cost benefit analysis would be required.	**40**
Strategy & Service Improvement	Summary of proposal: Introduction of charging for high footfall public toilets Delivery risk and impact: Requires capital investment to install charging stations at the toilets. The Council is considering how to mitigate the impact of this proposal for residents. See EIA 11.	**70**
Strategy & Service Improvement	Summary of proposal: Stop supporting Brighton and Hove community composting project. Delivery risk and impact: Existing links with the organisation, by stopping the funding it could create issues to support work	**35**

Section / Service Area	Brief Summary of Budget Proposal / Strategy and Risks	Total Savings Proposed 2026/27
		£'000
	already underway. Could inadvertently increase costs in food waste collection.	
Environmental Services	Summary of proposal: Increased income from commercial and green waste to reflect the actual activity. Delivery risk and impact: Potential risk that the introduction of other charges could impact on residents' uptake on garden waste. This needs to be considered within the wider commercialisation strategy. See EIA 9.	**340**
Environmental Services	Summary of proposal: Full cost recovery from commercial event waste collection Delivery risk and impact: Include in Events Strategy - January	**100**
Fleet	Summary of proposal: Rationalise the use of PPE and vehicle parts to deliver a saving. Delivery risk and impact: No delivery risk.	**30**
Environmental Services Total		**755**
Place		
Net Zero	Summary of proposal: Ensure the council is achieving value for money on its energy and water bills by reviewing metering arrangements and improving our ability to detect water leaks and abnormal energy use. Delivery risk and impact: Will impact on multiple budgets across the council, rather than just the Energy & Water team.	**60**
Net Zero	Summary of proposal: Cease paying for specific Climate Communications and Engagement to support the Net Zero programme Delivery risk and impact: News stories would need to be managed by the central communications team. Net zero	**60**

Section / Service Area	Brief Summary of Budget Proposal / Strategy and Risks	Total Savings Proposed 2026/27
		£'000
	communications will still be a key priority for the Council and this work will be mainstreamed across the communications service.	
Development Planning	Summary of proposal: Make use of functionality within existing software to rationalise software licencing costs. Delivery risk and impact: Dependent on IT&D supporting with the upgrading of existing software. To date this has not been prioritised	**10**
Development Planning	Summary of proposal: Introduce a Programme wide Planning Performance Agreement (PPA) between Planning and the Large Panel System Programme allowing for a smoother planning process. Delivery risk and impact: The current saving is the net income assumed from the programme wide PPA, actual income will need to be for more than to compensate for the loss of income from the site specific PPAs	**50**
Place Total		**180**
Digital Innovation		
Digital Innovation	Summary of proposal: Undertake a review to identify the old telephony lines that are redundant following the transition to new technology. Delivery risk and impact: Low risk - will require resource time to implement.	**20**
Digital Innovation	Summary of proposal: Budget alignment to reflect changes in recruitment software contract. Delivery risk and impact: Low risk	**22**
Digital Innovation Total		**42**
City Operations Total		**1,682**

Central Hub

Section / Service Area	Brief Summary of Budget Proposal / Strategy and Risks	Total Savings Proposed 2026/27 £'000
Central Hub		
Cabinet Office		
Policy	Summary of proposal: Reduction in spend on subscriptions for the council Delivery risk and impact: Could restrict officer's access to information that would help with decision making and planning. Would require officers to keep up to date with changes in legislation without the use of subscriptions.	**50**
Cabinet Office Total		**50**
Finance & Property		
Building Surveying	Summary of proposal: Pressure funding reinstated to the base budget, to be reversed and allocation of Planned Maintenance Budgets to be contained within current resource allocation. Delivery risk and impact: No delivery risk - reversing the pressure funding reduces the budget resource available for investment in the council's property portfolio. With the Rationalisation of properties this would be deemed low risk.	**200**
Building Surveying	Summary of proposal: Reduction in fee payable to Royal Pavilion & Museums Trust (RPMT) for planned buildings maintenance as part of fee renegotiation. Delivery risk and impact: High risk yet to be negotiated so cannot be included yet. RPMT are requesting more investment not less.	**63**
Estates Management	Summary of proposal: New England House (NEH), running costs associated with the building including utility costs. This should be able to be delivered now the building is vacant.	**300**

Section / Service Area	Brief Summary of Budget Proposal / Strategy and Risks	Total Savings Proposed 2026/27
		£'000
	Delivery risk and impact: A long-term decision on the future of this building has not yet been made.	
Estates Management	Summary of proposal: Bartholomew House - assuming transaction occurs before June 2026. Utilities, NNDR, Service Charge only - maintenance saved in People & Innovation. Delivery risk and impact: Net Savings based on the option taken forward for Bartholomew House. Net of maintenance costs of £72k saved in People & Innovation.	**175**
Financial services - Provides a full range of financial services including the S151 Chief Finance Officer, Financial Advice (Business Partnering) support to services, Medium-term Financial Planning and Annual Budget Preparation, Treasury Management, Taxation and Insurance services, management accounting, reporting and forecasting (TBM), account maintenance, and completion of statutory government returns and grant claims. It also provides contracted Services to Schools, South Downs National Park Authority (SDNPA), the Coast to Capital LEP and the Housing Joint Venture (JV).	Summary of proposal: Inflationary uplift for finance services provided in external contracts, including SDNPA and Housing JV, this will bring the budgets in line with the income due from external bodies. Delivery risk and impact: No risk, if not implemented the budgets will not reflect the income due.	**50**
Financial services - as above	Summary of proposal: Contract efficiencies from increasing the amount of VAT work carried out in house compared to using external consultancy. Delivery risk and impact: No risk. Reflects new way of working.	**18**
Finance & Property Total		**806**
Governance & Law		
Democratic Services - Democratic Services support all of the council's official and formal meetings such as Full Council, Cabinet as well as any other Committee. Democratic services ensure the smooth and efficient management of the decision-making processes of the council.	Summary of proposal: Rationalise the budgets for corporate phones Delivery risk and impact: No risk.	**2**

Section / Service Area	Brief Summary of Budget Proposal / Strategy and Risks	Total Savings Proposed 2026/27
		£'000
Democratic Services - as above	Summary of proposal: Removal of vacant apprentice post within team. The post is currently vacant and the team have absorbed the additional work. Delivery risk and impact: Increases pressure on the team, risking some impact on service delivery.	**25**
Local Land Charges: Maintain the local land charges register and sell reports based on the register to conveyancers	Summary of proposal: Reduce staffing budgets to permanently recognise reduction in hours from one member of staff - 0.41 FTE of Scale 6. This is a reduction that has already been implemented. Delivery risk and impact: The service lacks resilience due to size of team, therefore some risk of impact on service delivery.	**10**
Registration Services - Deliver and generate income through the registration of births, deaths, marriages, civil partnerships and citizenship Coroner - A shared service with WSCC delivering support to HM Senior Coroner for West Sussex, Brighton & Hove in their role investigating and explaining deaths within the jurisdiction Mortuary - Deliver body storage and postmortem provision to HM Senior Coroner for West Sussex, Brighton & Hove and generate income by providing this service to other local authorities	Summary of proposal: Comprehensive transformation of registration services by streamlining processes, optimising resources and embedding efficiency into service delivery Delivery risk and impact: Implications of managing change and challenging old ways of working – potential staffing challenges during the transition period	**60**
Legal services advise officers and members on legal matters covering all areas of the council's responsibilities. As a legal practice, the council's Legal Services team also provides additional services to external clients such as charities, the East Sussex Fire Authority and other local authorities.	Summary of proposal: Salary saving - re-profiling within the Corporate Law Team Delivery risk and impact: Low impact/risk – this change has taken effect.	**10**
Legal services - as above	Summary of proposal: Increase in income (Right to Buy increased charges to other local authorities).	**10**

Section / Service Area	Brief Summary of Budget Proposal / Strategy and Risks	Total Savings Proposed 2026/27
		£'000
	Delivery risk and impact: Proposal is limited due to having undertaken significant reviews and uplifts of income targets over previous years. The risk of increase in fees is losing external work due to market not being willing to pay more, making increase undeliverable. There is an additional risk of losing much of Legal Services £600k external income post Local Government Reorganisation and Devolution as could be delivered by new Unitary Authorities and/or Mayoral Strategic Authorities.	
Legal services - as above	Summary of proposal: Software review - remove contract management software / removal of some online books / reduction in non-staffing budgets for training / phones etc Delivery risk and impact: Reduced access to material to assisted staff with delivery of services. Impact considered low as sufficient alternatives in place.	**35**
Governance & Law Total		**152**
People & Innovation		
Health, Safety, Wellbeing, Facilities and Building Services - Facilities and Building Services	Summary of proposal: Asset rationalisation strategy, consideration of the sale or long lease of Bartholomew House and other operational assets. Delivery risk and impact: Risk of assets disposals not being completed in year and full savings not being met within timescales.	**300**
Health, Safety, Wellbeing, Facilities and Building Services - Facilities and Building Services	Summary of proposal: Rationalising contracts - develop one facilities management contract. Delivery risk and impact: Difficult to implement in timescales required.	**70**

Section / Service Area	Brief Summary of Budget Proposal / Strategy and Risks	Total Savings Proposed 2026/27
		£'000
Organisational Development, Learning & Inclusion - Learning, Apprenticeships & Organisational Development	Summary of proposal: Refresh of the council's Learning, Skills & Development offer and service redesign. Delivery risk and impact: Risk that this counters the priority to make the council a learning organisation that is continually innovating and improving by equipping council staff with the new skills and capability they need in the 2020s and beyond and supporting organisational development potentially risking support around making a culture shift in working in different ways, all of which is linked to our council performance and front line delivery.	**151**
Human Resources - Business Partnering, Advisory and Reward, Policy and Strategy	Summary of proposal: Reduction in staffing budget. Review of the service operating model is underway to transform the way customer contact is managed within HR and enable a more efficient way of working freeing up senior HR staff from day to day queries and focus on complex work. The scope and extent of the service to the organisation will need to be reviewed to align with reduced levels of resource and to focus support to the organisation on the greatest need and organisational priorities. Delivery risk and impact: Any reduction in capacity will reduce flexibility to react to ad hoc issues and reduce overall capacity for delivering "business as usual" service. HR activity has significantly increased in last two years with increases in suspensions, formal HR procedural work and rise in complexity.	**68**
Human Resources - as above	Summary of proposal: Recharge part of cost of HR Manager policy and recruitment to the recruitment team budget which is funded by income that will cover this cost. Delivery risk and impact: Recruitment income is volatile as driven by recruitment volumes.	**15**

Section / Service Area	Brief Summary of Budget Proposal / Strategy and Risks	Total Savings Proposed 2026/27
		£'000
Human Resources - as above	Summary of proposal: Reprocurement of combined staff benefits platform and Employee Assistance Programme offer expected to achieve savings on current overall costs Delivery risk and impact: New provider presents risks in terms of quality of service provision and dependant on appointing one specific provider through a framework.	**13**
Human Resources - as above	Summary of proposal: Reduction in supplies and services budgets Delivery risk and impact: Reduced flexibility in overall budget to meet demands	**10**
Innovation - Drive continuous improvement and efficiency to enable delivery of the organisational priorities to better serve our customers and contribute towards robust governance.	Summary of proposal: Reduced capacity within the Information Rights team Delivery risk and impact: Not currently meeting statutory duties. By reducing the budget, there is an increased risk that the council remains non-compliant and that performance declines further due to increasing demand. Significant risk to reputation.	**57**
Innovation - as above	Summary of proposal: Reduced capacity within the Customer Feedback team Delivery risk and impact: Not currently meeting Ombudsman expectations some of which are statutory. By reducing the budget, there is an increased risk that the council remains non-compliant and that performance declines further due to increasing demand. Significant risk to reputation and increased risks around higher financial remedies.	**58**
Innovation - as above	Summary of proposal: Reduced operational and development funding Delivery risk and impact: Risks associated with not having	**26**

Section / Service Area	Brief Summary of Budget Proposal / Strategy and Risks	Total Savings Proposed 2026/27
		£'000
	sufficient funding for requirements emerging during the year. Costs to communicate.	
Strategic Communications and Engagement	Summary of proposal: The Communications and Engagement service includes a mix of core-funded, externally funded and temporarily funded roles. The overall team structure, roles and functions are being reviewed as part of a Service redesign to ensure a more sustainable service that maintains a strategic, creative and commercial communications and engagement function while delivering a saving. Delivery risk and impact: Would need a reduction in service offer. Strategic communications is required to deliver the full Council Plan vision and transformation through two-way communication and active engagement with residents, communities, staff and stakeholders which requires capacity. Increasingly complex and uncertain media and social media landscape and increasing costs in areas such as marketing outside of council control.	**50**
Strategic Communications and Engagement	Summary of proposal: Increased advertising opportunities Delivery risk and impact: Increasing street lighting banner advertising sites in key locations. As part of new contract for April 2026 will be offering more locations for advertising and therefore more opportunities for income generation.	**40**
People & Innovation Total		**858**
Contribution to Orbis		
Orbis Services refers to the Orbis Operational Budget which covers Internal Audit, Procurement and the Integrated elements of IT&D, as well as Finance 'Centres of Expertise' for Treasury and Insurance. The contribution is based on an agreed contribution ratio (ACR) as specified in the Inter-Authority Agreement (IAA). There are also Sovereign-held budgets	Summary of proposal: Efficiency savings expected from review of the Orbis Procurement service. Delivery risk and impact: Saving delivery pending decision regarding the future of the Procurement service.	**250**

Section / Service Area	Brief Summary of Budget Proposal / Strategy and Risks	Total Savings Proposed 2026/27
		£'000
managed by Orbis services on behalf of the partners but where overall control rests with the funding authority (these are known as 'Mobo' budgets).		
Contribution to Orbis Total		**250**
Central Hub Total		**2,116**

MEDIUM TERM FINANCIAL STRATEGY TABLES

Core Planning Assumptions

The table below sets out the core planning assumptions included in the MTFS projections:

	2025/26	2026/27	2027/28	2028/29	2029/30
Pay inflation and pay related matters:					
- Provision for pay award	*2.75%*	2.75%	2.50%	2.50%	2.50%
- Employers pension contribution rate change**	*0.00%*	-4.90%	0.00%	0.00%	0.00%
General inflation:					
- Inflation on social care third party payments	*3.00%*	2.50%	2.50%	2.50%	2.50%
- Inflation on non-pay expenditure	*1.00% - 3.00%*	1.00% - 3.00%	1.00% - 3.00%	1.00% - 3.00%	1.00% - 3.00%
- Inflation on waste PFI	*3.50%*	3.50%	3.50%	3.50%	3.50%
- Inflation on income	*3.00%*	3.00%	3.00%	2.50%	2.50%
- Inflation on parking income	*3.00%*	3.00%	3.00%	2.50%	2.50%
- Inflation on penalty charge notices	*0.00%*	0.00%	0.00%	0.00%	0.00%
Resources:					
Change to Revenue Support Grant (RSG)	*1.65%*	1.63%	1.64%	1.98%	1.98%
Business rates poundage inflation uplift	*1.65%*	1.63%	1.64%	1.98%	1.98%
Assumed council tax threshold increase	*2.99%*	2.99%	2.99%	2.99%	2.99%
Adult Social Care Precept	*2.00%*	2.00%	2.00%	2.00%	2.00%
Council Tax Base	1.50%*	0.87%	0.86%	0.61%	0.61%

**Included the introduction of Second Homes Premium which is equivalent to a 0.9% increase in the tax base*

***The Employer Pension rate will reduce from 19.80% to 14.90% from 1st April 2026 for three years*

Summary of MTFS projections

The table below sets out the savings /budget gap, taking into account the anticipated expenditure over the MTFS period and the funding resources available:

Medium Term Financial Strategy 2026 to 2030	2026/27	2027/28	2028/29	2029/30
	£m	£m	£m	£m
Net Budget Requirement B/Fwd	**264.819**	**281.740**	**295.585**	**309.843**
Remove net one off short term funding and expenditure	0.000	0.000	0.000	0.000
Net Budget Requirement B/Fwd	**264.819**	**281.740**	**295.585**	**309.843**
Standard Pay and Inflation – Expenditure	13.137	12.987	13.303	13.667
Standard Inflation - Income	(3.446)	(3.550)	(3.112)	(3.189)
Demographic and inflationary pressures in Adult Social Care including Adult Learning Disabilities	1.285	9.495	9.724	10.120
Demographic and inflationary pressures for Children's disability, Children in Care, and Care Leavers	2.595	1.620	1.771	1.396
Temporary Accommodation and Rough Sleepers - cost and demand pressures	11.106	1.100	1.762	1.650
Home to School Transport - cost and demand pressures	1.285	0.670	0.738	0.809
Estimated loss of funding from Fair Funding Reform	6.000	2.500	6.000	0.000
Estimated loss of other grant income	0.700	4.183	0.000	0.000
Income Pressure: New England House	1.200	0.000	0.000	0.000
Housing Benefit Subsidy Shortfall	2.400	0.000	0.000	0.000
All other pressures across council services	7.373	5.564	5.117	5.686
Commitment - Change in contributions to/from reserves	3.015	(1.125)	0.000	0.000
Commitment - Change in financing Costs	0.913	1.618	0.620	(0.172)
Commitment - Pay award 2025/26 above 2.75% inflation assumption	0.827	0.000	0.000	0.000
Commitment – Reduction in Employer Pension contribution rate	(6.920)	0.000	0.000	0.000
Commitment - impact of previous decisions, grant changes and assumptions	0.377	1.803	0.703	1.396
Budget Gap (Savings Requirement)	(24.926)	(23.020)	(22.368)	(16.344)
Budget Requirement C/Fwd	**281.740**	**295.585**	**309.843**	**324.862**

Funded by:*				
Revenue Support Grant	8.932	9.078	9.258	9.441
Locally retained Business Rates	63.507	64.862	66.468	68.114
Collection Fund position	0.000	0.000	0.000	0.000
Council Tax including Adult Social Care Precept	209.301	221.645	234.117	247.307
Total Funding	**281.740**	**295.585**	**309.843**	**324.862**

Note – the presentation of resources will change considerably within the February report due to the changes expected from the Fair Funding review and the consolidation of a number of funding streams into Revenue Support Grant

Appendix 3

Transformation & Innovation Portfolio and Innovation Funding

The council has agreed a Transformation & Innovation portfolio of programmes and projects to support delivery of the Council Plan and savings as part of our Medium Term Financial Strategy. Through the portfolio, we will reimagine what we do and how we do it – building a Learning Organisation that is agile, inclusive and future-ready. By 2030, we will deliver smarter services, co-create change and embed innovation as a way of working. The portfolio will strength financial resilience through bold savings and strategic investments, achieving our vision of a *better Brighton & Hove for all*.

The Transformation & Innovation portfolio comprises ten strategic programmes, structured into three themes: Addressing the critical areas of demand led pressures, Financial Levers that will underpin the organisation's financial sustainability, and Strategic Enablers, which will ensure the organisation is geared up to deliver transformational change.

Key Demand led pressures

- **Adult Social Care Transformation**

  This strategic programme covers the key areas of improvement in Adult Social Care (ASC) for Brighton & Hove. When compared to statistical neighbours, the council is an outlier in the number of residential placements (particularly for working age), completed annual reviews and reablement offer. The prevention offer at the entry point to ASC services, in line with national best practice, is another area of focus. Key areas of improvement were also reflected in the recent regulatory outcome by Care Quality Commission (CQC).

  The strategic programme comprises the following workstreams:

  - Market management: Reducing residential and nursing care admissions and managing provider fee uplifts.
  - Targeted reviews.
  - Increased Community Reablement.
  - Improved prevention offer at the ASC front door.

- **Children's Services Transformation**

  The programme covers the key areas of improvement and transformation in Children's Services for Brighton & Hove. When compared to statistical neighbours, the council has a lower number of children in residential care but also significantly fewer homes in the south compared to north. Children are at risk of residential care due to a combination of complex need and sufficiency issues. The council is keen to bring down spend on placements at the same time as

keeping children local, improving placement quality and keeping children in families.

The strategic programme comprises the following workstreams:

- Development of new accommodation for Unaccompanied Asylum Seeking Children.
- Reunification of Families.
- Expansion of Mockingbird & Fostering Plus.
- Families First and Early Help.
- Early Help to reduce the number of children needing social work intervention and entering care.
- Increased fostering households through innovation.
- Home to School Transport.

- **Homes & Homelessness**

The programme will deliver on one of the most challenging areas for Brighton & Hove with deepening homelessness crisis and managing increasing demand for Temporary Accommodation (TA). Brighton & Hove's use of TA is increasing, with increased reliance on spot purchased accommodation. The financial cost is coupled with challenging outcomes for individuals who have much higher needs year on year. The trajectory is unsustainable and the council is now considering bold, strategic action to address the issue.

The strategic programme comprises the following workstreams:

- Increasing the supply of more affordable TA.
- Reducing the unit cost of existing TA.
- Improving effectiveness in prevention of homelessness.
- Accelerating move on from Temporary Accommodation.

Financial levers

- **Income & Commercialisation**

The strategic programme aims to embed a business mindset and commercial strategy across services, exploiting market opportunities and harnessing the city's unique identity and environment to deliver new income streams. It will deliver the following outcomes:

- Increased net positive income for the council.
- Sustainable commercial culture and capability.
- Clear governance and risk management for all commercial activities.

A phased approach will be taken:

- Phase 1: Focus on quick wins within City Operations and expanding current services within available capacity.
- Phase 2: Incubate and refine commercial models, then scale to other directorates and more complex areas.

- **Procurement, Commissioning & Contract Management**

  The strategic programme will:

  - Identify indicative savings and deliver savings strategies.
  - Increase the use of spend analysis to inform strategic decisions and identify savings.
  - Consolidate contracts and reduce duplication.
  - Improve social value and contract outcomes.
  - Create a centralised, comprehensive contract register with reporting solution.
  - Produce training, templates, and guidance with clear, published roles and responsibilities for procurement, commissioning and contract management.
  - Enhance collaboration between Procurement, Legal, Finance and service teams.

  Consultants have been commissioned to undertake a short, urgent review of all aspects potentially within the scope of the strategic programme, along with associated savings.

- **Asset Strategy**

  The strategic programme aims to have a coherent and data driven Asset Strategy. This will allow the council to maximise capital receipts, reduce liabilities and risk, and retain income generating and strategic property. The focus of the programme is to:

  - Produce capital receipts of at least £50 million over four years.
  - Identify and produce more capital receipts for subsequent years.
  - Rationalise operational buildings.
  - Increase the number of active transactions in each stage of the pipeline.
  - Generate efficiency gains and enable better strategic decisions through better data management.
  - Reduce the cost of running operational buildings through disposals.

  The strategic programme comprises the following:

  - Property disposals/capital receipts.
  - Appropriation to the Housing Revenue Account.
  - Operational property rationalisation, including large complex properties/ service delivery.
  - Property portfolio data management.

Strategic enablers

- **Organisational Change**

  The strategic programmes aims to:

  - Build a learning culture that is connected, confident, innovative and creative, diverse and inclusive, healthy and psychologically safe.
  - Aid staff wellbeing and reduce sickness absence.
  - Deliver financial savings and service improvements.
  - Create an efficient workforce required to deliver a *better Brighton and Hove for all*.

  Delivery will be via three core programmes/projects:

  - Operationalising the Learning Framework.
  - Sickness Absence & Workforce Wellbeing.
  - Delivery Models Review.
  - Functional alignment, including Admin & Business Support (Phase 2), Customer Service (Phase 2), IT&D and Programme & Project Management.

- **Digital Innovation & Technology**

  The programme aims to use ‘test and learn’ techniques to trial new technologies rapidly to find out what works best for the council. This embeds the council’s ways of working as a learning organisation. It will do this in combination with supporting and enabling all council services to deliver improved outcomes for customers, through the development of Digital, Data & Technology (DDaT) capabilities delivering the following outcomes:

  - Building the foundations for well run council processes.
  - Developing the technology infrastructure and ensuring it is fit for the future.
  - Developing insight via Artificial Intelligence (AI) Tooling for better decision making.
  - Growing the skills for staff to ensure compliance and deliver improved customer outcomes.

  A phased approach will be taken:

  - Phase 1: Focus on the completion of the innovation technology pilots and completion of Foundational projects within DDaT.
  - Phase 2: Develop and refine capital investment as a direct result of the pilot outcomes, then progress future information technology capital investment to deliver a new Digital & Technology Strategy.

- **Devolution**

  Devolution is the transfer of powers and funding from national to local government. This enables decisions to be made closer to the local people,

communities and businesses they affect. It offers greater freedom and flexibility to deliver better targeted public services, economic growth and stronger local partnerships. This is achieved by creating a new strategic authority covering a region, usually overseen by an elected mayor. Brighton & Hove is part of the government's Devolution Priority Programme (DPP) which means that elections for a Mayor for Sussex & Brighton are due to take place in May 2026. The programme is included within the Transformation & Innovation portfolio due to its significance to the future of the council.

- **Local Government Reorganisation**

  Central government invited councils in Sussex and Brighton & Hove to develop proposals for Local Government Reorganisation (LGR), which aims to simplify council structures by replacing the two tier system of district and county councils with unitary councils that deliver all local services. As the only existing unitary authority in Sussex, Brighton & Hove was not legally required to be part of the reorganisation. However, its inclusion in the DPP meant that it needed to work collaboratively across Sussex to design LGR in a way that unlocks Devolution. Changes to other councils in Sussex provided an opportunity to consider whether to stay on the current Brighton & Hove footprint or combine with other areas. As with Devolution, the programme is included within the Transformation & Innovation portfolio due to its significance to the future of the council.

Each strategic programme has a Corporate Leadership Team (CLT) Sponsor, Senior Responsible Owner (SRO), Programme Manager and Critical Friend. As part of the budget setting process for 2026/27, the strategic programmes have set out what is within their scope, their savings proposals and investment requirements across the four years of the MTFS, and high level delivery plans.

A Savings & Innovation Delivery Board (SIDB) has been established to oversee the management of the council's finances and development of a longer term plan for financial sustainability. The Board meets fortnightly and is jointly chaired by the Chief Finance Officer and Director for People & Innovation. The Board has had a key role in reviewing the savings and investment proposals (ie. requests from the Innovation Fund) from the strategic programmes and agreeing which should be put forward as part of the December budget report to Cabinet.

Portfolio progress is reported quarterly to CLT Innovation and going forward, will include action updates from the Corporate Leadership Plan for each strategic programme and updates on progress from those initiatives in receipt of Innovation funding. Regular updates are also provided to the Cabinet Member for Customer Services & Public Realm. Updates to Informal Cabinet/Cabinet are provided as and when required. Further consideration will be given to ensure the correct data and metrics are place to monitor benefits in more detail, including those that are cashable and non-cashable, and cost avoidance.

Forming a multi-year work plan, the portfolio will be closely managed to ensure opportunities for transformation and innovation are encouraged and explored, focus remains on the delivery of cashable savings to support the MTFS and progress is regularly monitored by both the SIDB and CLT Innovation. In the new year, the SIDB will encourage further exploration of connections and opportunities for joint working across directorates and potentially, with other organisations and partners. Time will be taken to work through more complex and significant change proposals across the whole of the MTFS, and to challenge thinking and explore opportunities around the shape and focus of the organisation of the future.

Appendix 4

Budget Equality Impact Assessment (EIA) 2026/27 – Service Users

The Budget EIA process is a legal duty supporting good financial decision-making. It assesses how proposals may impact on specific groups differently (and whether/how negative impacts can be reduced or avoided) so that these consequences are explicitly considered. Decisions must be informed by accurate, well-informed assessment of likely impacts so that they are fair, transparent, and accountable. Budget EIAs provide a record of this assessment and consideration. Members are referred to the full text of s149 of the Equality Act 2010 – included at the end of this document – which must be considered when making decisions on budget proposals.

Equality impact assessments describing impacts on service-users		
Directorates	**Services**	**EIA No.**
Families, Children and Wellbeing	Front Door for Families	1
	Extended Adolescence	2
	Partners in Change Hub	3
	Youth Arts	4
	Violence against women and girls	5
Homes & Adult Social Care	Community Care	6
	Housing demand management	7
City Operations	City Parks parking charges	8
	Trade and garden waste	9
	Waste services charges	10
	Public toilets charges	11

Budget Proposal: EIA 1	
Title of budget saving being assessed:	**Front Door for Families reduction**
Name and title of officer responsible for this EIA:	Kirsty Hanna, Director, Family Help and Protection
Directorate and Service Name:	Families, Children & Wellbeing, Safeguarding and Care

Briefly describe the budget saving proposal:

A reduction in the staffing establishment of 1.0 FTE – currently vacant - in the Front Door for Families. Contacts have reduced by 13%, therefore this reduction can be managed without significantly impacting service performance in providing children safeguarding services to the city in a timely way.

Summarise the most significant impacts identified by this assessment including which groups will be disproportionally negatively affected drawing out intersectional impacts as applicable:

This reduction in budget may impact on the response to referrals to the Front Door for Families regarding Children's Social Care. Black and Global majority children, including separated children arriving in the UK, are over-represented in this cohort and so, if there was an impact, they would be disproportionately affected. A significant number of the children referred to the service are also disabled, neurodivergent and/or experiencing mental health issues so they would also be disproportionately impacted.

Consultation, engagement and supporting EIAs

What consultations or engagement activities are being used to inform this assessment?

If consultation is planned or in process – state this and state when it will done/completed even if indicative. If no consultation completed or planned, state this, giving an explanation.

No consultation planned as no significant impact identified.

What other budget or service EIAs can assist/have been used to inform this assessment?

Extended Adolescent Service.

Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this proposal?

Consider all possible intersections (Delete and State Yes, No, Not Applicable)

Age	YES
Disability and inclusive adjustments, coverage under equality act and not	YES

Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	YES
Religion, Belief, Spirituality, Faith, or Atheism	YES
Gender Identity and Sex (including non-binary and Intersex people)	YES
Gender Reassignment	Not applicable
Sexual Orientation	Not applicable
Marriage and Civil Partnership	Not applicable
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	Yes
Armed Forces Personnel, their families, and Veterans	Not applicable
Expatriates, Migrants, Asylum Seekers, and Refugees	Yes
Carers	Yes
Looked after children, Care Leavers, Care and fostering experienced people	Yes
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	YES
Socio-economic Disadvantage	YES
Homelessness and associated risk and vulnerability	YES
Human Rights	Not applicable
Another relevant group: **Those experiencing substance misuse**	YES

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

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

- Sex workers

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

Not applicable

What are the arrangements for monitoring, and reviewing the impact of this proposal?

This will be monitored through the Senior Leadership Team performance meeting as well as the Front Door for Families Management meeting

Impacts

Briefly state source of data or data analysis being used to describe the disproportionate negative impacts. Preferably provide link to data/ analysis if open data source.

Data and analysis sources may include (not an exhaustive list):

- **Consider a wide range (including but not limited to):**
- Census and local intelligence data
- Service specific data
- Community consultations
- Insights from customer feedback including complaints and survey results
- Lived experiences and qualitative data
- Joint Strategic Needs Assessment (JSNA) data
- Health Inequalities data
- Good practice research
- National data and reports relevant to the service
- Workforce, leaver, and recruitment data, surveys, insights
- Feedback from internal ‘staff as residents’ consultations
- Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
- Insights, gaps, and data analyses on ‘who’ the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.

Assess impact for different population groups	**Is there a possible disproportionate negative impact?**	**Describe the potential negative impact, considering for differences within groups For example, different ethnic groups, and peoples intersecting identities e.g. disabled women of faith** **OR** **If no impact is identified, briefly state why.**

	State Yes or No	
Age including those under 16, young adults, multiple ethnicities, those with various intersections.	yes	All the young people this will impact will be under 18 and will be among the most vulnerable children in society, experiencing trauma and vulnerability
Disability includes physical and sensory disabled, D/deaf, deafened, hard of hearing, blind, neurodiverse people, people with non-visible disabilities.	yes	Many of the young people requiring support will be disabled, neurodivergent and / or experiencing mental health issues.
Ethnicity, 'Race', ethnic heritage including Gypsy, Roma, Travellers	yes	Black and Global Majority Children are over-represented in our services and this is especially the case for children of mixed heritage or from Gypsy, Roma, Traveller backgrounds.
Religion, Spirituality, Faith, Atheism, and philosophical belief	no	
Gender and Sex including non-binary and intersex people	Yes	A number of children in our services identify as non-binary or trans. These young people will often also have additional complex needs and vulnerability and may require support from social care.
Gender Reassignment	N/a	N/a
Sexual Orientation	N/a	N/a
Marriage and Civil Partnership	N/a	N/a
Pregnancy, Maternity, Paternity, Adoption, Menopause, (In)fertility (across intersections and non-binary gender spectrum)	yes	Social care services support families during pregnancy and early infancy
Armed Forces Personnel, their families, and Veterans	N/a	N/a
Expatriates, Migrants, Asylum Seekers, and Refugees considering for age, language, and various intersections	yes	Social care services support separated children arriving in the UK and so reduction in these services may have a disproportionate impact for these children

Carers considering for age, language, and various intersections	yes	Young people accessing social care are more likely to be young carers and so reduction in these services may have a disproportionate impact for these children
Looked after children, Care Leavers, Care and fostering experienced people considering for age, language, and various intersections	yes	Social care services support children in care and care leavers and so reduction in these services may have a disproportionate impact for these children
Domestic and/or sexual abuse and violence survivors	yes	Young people in social care services are more likely to have come from families that have experienced domestic violence and are more likely to experience this in their own relationships
Socio-economic disadvantage considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections	yes	Young people accessing social care services are more likely to have come from families in poverty, therefore any cuts in adolescent services will impact on those children affected by childhood poverty
Homeless and rough sleepers considering for age, veteran, ethnicity, language, and various intersections	yes	Young people accessing the social care services are often at risk of homelessness and so reduction in these services may have a disproportionate impact for these children
Human Rights	n/a	n/a
Another relevant group: Substance misuse	Yes	Young people accessing social care services are more likely to have come from families who have experienced substance misuse and are more likely to have experienced these issues themselves

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

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

- Sex workers

Cumulative impacts

Are there other budget proposals from other service areas that might worsen or mitigate the impacts from your proposal? Please give a brief description including name of other service(s).

Savings against the Front Door for Families will impact on the service's ability to deal with referrals for families at risk. This may be worsened by other proposed reductions in the Family Help and Protection establishment, leading to the risk of an increase in the number of young people experiencing significant harm and escalating through the service, worsening the impact of these budget proposals. The specific proposals raised in this EIA will be mitigated by the fall in contacts to the Front Door for Families recently – a 13.5% in the year up to the end of September 2025.

Action planning

What SMART actions will be taken to mitigate the disproportionate impacts identified in section 3? If no mitigating action is possible, please state and explain why. Add additional rows as required.

1. SMART action 1: We are a demand led service and are therefore not able to reduce the demand as such. While we do everything possible to prevent children requiring our support, at times children will need to be safeguarded. By July 2026, we will implement the Families Transformation. Families First is a national programme led by the Department for Education (DfE). The overall aims of Families First are to refocus the children's social care system on prevention and to ensure that there is a robust multi-agency child protection system in place. As part of Families First we will create Family Help pods that focus on targeted early help and social work support, as well as creating a Multi-Agency Child Protection Team, which will have oversight of child protection decisions. One of the expected outcomes of Families First is that it will lead to a reduction in demand for high level services and this would include a reduction in referrals, and especially re-referrals, to our services in the longer term.
2. SMART action 2: By July 2026, as part of Families First Transformation we will create roles focused on prevention that support families to create sustainable change and reduce the number of re-referrals to the Front Door for Families.

Outcome of your assessment

Based on the information above give the proposal an impact score between 1 – 5.

1= proposal has minimal impact and/or mitigating actions will significantly minimise the impact

3= proposal will have a significant negative impact; however, mitigation actions will reduce the impact considerably.

5= proposal has significant impact and mitigating actions will have limited effect on reducing impact.

Proposal's impact score:	4

Publication

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

Directorate and Service Approval

Signatory:	**Name and Job Title:**	**Date:** DD-MMM-YY
Responsible Lead Officer:	Kirsty Hanna	24.10.25
Accountable Manager:	Kirsty Hanna	24.10.25

Budget Proposal: EIA 2	
Title of budget saving being assessed:	Extended Adolescent Service reduction
Name and title of officer responsible for this EIA:	Kirsty Hanna, Director, Family Help and Protection
Directorate and Service Name:	Families, Children & Wellbeing, Safeguarding and Care

Briefly describe the budget saving proposal:

A £50,000 saving on the Extended Adolescent Service, through reduction of a 1.0fte post currently vacant. This savings proposal could lead to less direct support to vulnerable teenagers. The service aims to keep children out of care; therefore, the risk is that more children enter care if this service is depleted. This will be older children as the Extended Adolescent Service works with 11+, these placements tend to be more expensive and far more likely to be high cost residential.

Summarise the most significant impacts identified by this assessment including which groups will be disproportionally negatively affected drawing out intersectional impacts as applicable:

This reduction in budget will impact on young people who are supported by the specialist adolescent service. This service supports the young people who are in care or who are at risk of significant harm. This includes young people at risk of criminal exploitation. Black and Global majority young people are over-represented in this cohort and so will be disproportionately affected. A significant number of the young people in the service are also disabled, neurodivergent and / or experiencing mental health issues so will also be disproportionately impacted. Young people open to the service are impacted by complex problems and trauma, including substance misuse.

Consultation, engagement and supporting EIAs

What consultations or engagement activities are being used to inform this assessment?

If consultation is planned or in process – state this and state when it will done/completed even if indicative. If no consultation completed or planned, state this, giving an explanation.

No consultation is planned, however work has been undertaken and continues with social work teams and managers to look at how we reduce the number of children and young people needing support from the Extended Adolescent Service, as well as work with external partners including Health to reduce the demands

What other budget or service EIAs can assist/have been used to inform this assessment?

None

Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this proposal?

Consider all possible intersections (Delete and State Yes, No, Not Applicable)

Age	YES
Disability and inclusive adjustments, coverage under equality act and not	YES
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	YES
Religion, Belief, Spirituality, Faith, or Atheism	YES
Gender Identity and Sex (including non-binary and Intersex people)	YES
Gender Reassignment	YES
Sexual Orientation	Not applicable
Marriage and Civil Partnership	Not applicable
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	Not applicable
Armed Forces Personnel, their families, and Veterans	Not applicable
Expatriates, Migrants, Asylum Seekers, and Refugees	Not applicable
Carers	Yes
Looked after children, Care Leavers, Care and fostering experienced people	Not applicable
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	YES
Socio-economic Disadvantage	YES
Homelessness and associated risk and vulnerability	YES
Human Rights	Not applicable
Another relevant group: **Those experiencing substance misuse**	YES

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

- Ex-offenders and people with unrelated convictions
- Lone parents
- People experiencing homelessness
- People facing literacy and numeracy barriers
- People on a low income and people living in the most deprived areas

- People who have experienced female genital mutilation (FGM)
- People who have experienced human trafficking or modern slavery
- People with experience of or living with addiction and/ or a substance use disorder (SUD)
- Sex workers

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

Not applicable

What are the arrangements for monitoring, and reviewing the impact of this proposal?

This will be monitored through the Senior Leadership Team performance meeting as well as the Adolescent Violence and Risk Management meeting

Impacts

Briefly state source of data or data analysis being used to describe the disproportionate negative impacts. Preferably provide link to data/ analysis if open data source.

Data and analysis sources may include (not an exhaustive list):

- **Consider a wide range (including but not limited to):**
- Census and local intelligence data
- Service specific data
- Community consultations
- Insights from customer feedback including complaints and survey results
- Lived experiences and qualitative data
- Joint Strategic Needs Assessment (JSNA) data
- Health Inequalities data
- Good practice research
- National data and reports relevant to the service
- Workforce, leaver, and recruitment data, surveys, insights
- Feedback from internal ‘staff as residents’ consultations
- Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
- Insights, gaps, and data analyses on ‘who’ the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.

Assess impact for different population groups	**Is there a possible disproportionate**	**Describe the potential negative impact, considering for differences within groups For example, different ethnic groups, and peoples**

	negative impact? State Yes or No	intersecting identities e.g. disabled women of faith OR If no impact is identified, briefly state why.
Age including those under 16, young adults, multiple ethnicities, those with various intersections.	yes	All the people this will impact will be under 18 and will be among the most vulnerable children in society, experiencing trauma and vulnerability
Disability includes physical and sensory disabled, D/deaf, deafened, hard of hearing, blind, neurodiverse people, people with non-visible disabilities.	yes	Many of the young people supported by the service are also disabled, neurodivergent and / or experiencing mental health issues
Ethnicity, 'Race', ethnic heritage including Gypsy, Roma, Travellers	yes	Black and Global Majority Children are over-represented in our services and this is especially the case for children of mixed heritage or from Gypsy, Roma, Traveller backgrounds.
Religion, Spirituality, Faith, Atheism, and philosophical belief	no	no disproportionate impact for this group
Gender and Sex including non-binary and intersex people	Yes	A number of children in our services identify as non-binary or trans. These young people will often also have additional complex needs and vulnerability and may require support from the adolescent service.
Gender Reassignment	N/a	N/a
Sexual Orientation	Yes	LGBTQ+ young people will often also have additional needs and vulnerability
Marriage and Civil Partnership	N/a	N/a
Pregnancy, Maternity, Paternity, Adoption, Menopause, (In)fertility (across intersections and non-binary gender spectrum)	N/a	N/a
Armed Forces Personnel, their families, and Veterans	N/a	N/a
Expatriates, Migrants, Asylum Seekers, and Refugees considering for age,	yes	n/a

language, and various intersections		
Carers considering for age, language, and various intersections	n/a	Young people accessing the adolescent service are more likely to be young carers
Looked after children, Care Leavers, Care and fostering experienced people considering for age, language, and various intersections	yes	n/a
Domestic and/or sexual abuse and violence survivors	yes	Young people in the adolescent service are more likely to have come from families that have experienced domestic violence and are more likely to experience this in their own relationships
Socio-economic disadvantage considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections	yes	Young people accessing the adolescent service are more likely to have come from families in poverty, therefore any cuts in adolescent services will impact on those children affected by childhood poverty
Homeless and rough sleepers considering for age, veteran, ethnicity, language, and various intersections	n/a	Young people accessing the adolescent service are often at risk of homelessness
Human Rights	n/a	n/a
Another relevant group: Substance misuse	Yes	Young people accessing the extended adolescent service are more likely to have come from families who have experienced substance misuse and are more likely to have experienced these issues themselves

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

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

- People with experience of or living with addiction and/ or a substance use disorder (SUD)
- Sex workers

Cumulative impacts

Are there other budget proposals from other service areas that might worsen or mitigate the impacts from your proposal? Please give a brief description including name of other service(s).

Savings against the Family Help and Protection establishment may impact on the support for children and families and lead to an increase in the number of young people accessing the adolescent service and worsening the impact of these budget proposals.

Action planning

What SMART actions will be taken to mitigate the disproportionate impacts identified in section 3? If no mitigating action is possible, please state and explain why. Add additional rows as required.

SMART action 1: We are a demand led service and are therefore not able to reduce the demand as such. While we do everything possible to prevent children requiring our support, at times children will need to be safeguarded. By July 2026, we will implement the Families Transformation. Families First is a national programme led by the Department for Education (DfE). The overall aims of Families First are to refocus the children's social care system on prevention and to ensure that there is a robust multi-agency child protection system in place. As part of Families First we will create Family Help pods that focus on targeted early help and social work support, as well as creating a Multi-Agency Child Protection Team, which will have oversight of child protection decisions. One of the expected outcomes of Families First is that it will lead to a reduction in demand for high level services and this would include a reduction in high level need in the adolescent service.
SMART action 2: As part of Families First, by July 2026, we will create Youth Keyworker roles in the Adolescent Service to reduce demand on the Extended Adolescent Service.

Outcome of your assessment

Based on the information above give the proposal an impact score between 1 – 5.

1= proposal has minimal impact and/or mitigating actions will significantly minimise the impact

3= proposal will have a significant negative impact; however, mitigation actions will reduce the impact considerably.

5= proposal has significant impact and mitigating actions will have limited effect on reducing impact.

Proposal's impact score:	4

Publication

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

Directorate and Service Approval

Signatory:	**Name and Job Title:**	**Date:** DD-MMM-YY
Responsible Lead Officer:	Kirsty Hanna	24.10.25
Accountable Manager:	Kirsty Hanna	24.10.25

Budget Proposal: EIA 3	
Title of budget saving being assessed:	**Partners in Change Hub**
Name and title of officer responsible for this EIA:	Kirsty Hanna, Director, Family Help and Protection
Directorate and Service Name:	Families, Children & Wellbeing, Safeguarding and Care

Briefly describe the budget saving proposal:

A 0.8 FTE reduction in the Partners in Change Hub staffing establishment. The Partners in Change Hub supports social work practice providing direct interventions to families and supporting Social Work Students and newly qualified social workers. The number of newly qualified social workers employed has decreased over the last 2 years.

Summarise the most significant impacts identified by this assessment including which groups will be disproportionally negatively affected drawing out intersectional impacts as applicable:

This reduction in budget will impact on the support to social workers and keyworkers who are providing support to families from a targeted early help stage, through child in need work, child protection plans and children in care. Tasks will need to be re-distributed within the Partners in Change Hub and this will impact on their workload. Black and Global majority children, including unaccompanied asylum-seeking children, are over-represented in this cohort and so will be disproportionately affected. A significant number of the children in the service are also disabled, neurodivergent and / or experiencing mental health issues so will also be disproportionately impacted.

Consultation, engagement and supporting EIAs

What consultations or engagement activities are being used to inform this assessment?

If consultation is planned or in process – state this and state when it will done/completed even if indicative. If no consultation completed or planned, state this, giving an explanation.

No consultation is planned.

What other budget or service EIAs can assist/have been used to inform this assessment?

Extended Adolescent Service.

Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this proposal?

Consider all possible intersections (Delete and State Yes, No, Not Applicable)

Age	YES

Disability and inclusive adjustments, coverage under equality act and not	YES
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	YES
Religion, Belief, Spirituality, Faith, or Atheism	YES
Gender Identity and Sex (including non-binary and Intersex people)	YES
Gender Reassignment	Not applicable
Sexual Orientation	Not applicable
Marriage and Civil Partnership	Not applicable
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	Yes
Armed Forces Personnel, their families, and Veterans	Not applicable
Expatriates, Migrants, Asylum Seekers, and Refugees	Yes
Carers	Yes
Looked after children, Care Leavers, Care and fostering experienced people	Yes
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	YES
Socio-economic Disadvantage	YES
Homelessness and associated risk and vulnerability	YES
Human Rights	Not applicable
Another relevant group: **Those experiencing substance misuse**	YES

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

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

- People with experience of or living with addiction and/ or a substance use disorder (SUD)
- Sex workers

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

Not applicable

What are the arrangements for monitoring, and reviewing the impact of this proposal?

This will be monitored through the Senior Leadership Team performance meeting as well as the Partners in Change Management meeting

Impacts

Briefly state source of data or data analysis being used to describe the disproportionate negative impacts. Preferably provide link to data/ analysis if open data source.

Data and analysis sources may include (not an exhaustive list):

- **Consider a wide range (including but not limited to):**
- Census and local intelligence data
- Service specific data
- Community consultations
- Insights from customer feedback including complaints and survey results
- Lived experiences and qualitative data
- Joint Strategic Needs Assessment (JSNA) data
- Health Inequalities data
- Good practice research
- National data and reports relevant to the service
- Workforce, leaver, and recruitment data, surveys, insights
- Feedback from internal ‘staff as residents’ consultations
- Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
- Insights, gaps, and data analyses on ‘who’ the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.

Assess impact for different population groups	**Is there a possible disproportionate negative impact?**	**Describe the potential negative impact, considering for differences within groups For example, different ethnic groups, and peoples intersecting identities e.g. disabled women of faith** **OR**

	State Yes or No	If no impact is identified, briefly state why.
Age including those under 16, young adults, multiple ethnicities, those with various intersections.	yes	All the people this will impact will be under 18 and will be among the most vulnerable children in society, experiencing trauma and vulnerability
Disability includes physical and sensory disabled, D/deaf, deafened, hard of hearing, blind, neurodiverse people, people with non-visible disabilities.	yes	Many children and young people in our services are disabled, neurodivergent and / or experiencing mental health issues.
Ethnicity, 'Race', ethnic heritage including Gypsy, Roma, Travellers	yes	Black and Global Majority Children are over-represented in our services and this is especially the case for children of mixed heritage or from Gypsy, Roma, Traveller backgrounds.
Religion, Spirituality, Faith, Atheism, and philosophical belief	no	
Gender and Sex including non-binary and intersex people	Yes	A number of children in our services identify as non-binary or trans. These young people will often also have additional complex needs and vulnerability
Gender Reassignment	N/a	N/a
Sexual Orientation	N/a	N/a
Marriage and Civil Partnership	N/a	N/a
Pregnancy, Maternity, Paternity, Adoption, Menopause, (In)fertility (across intersections and non-binary gender spectrum)	yes	Social care services support families during pregnancy and early infancy
Armed Forces Personnel, their families, and Veterans	N/a	N/a
Expatriates, Migrants, Asylum Seekers, and Refugees considering for age, language, and various intersections	yes	Social care services support separated children arriving in the UK and so reduction in these services may have a disproportionate impact for these children
Carers considering for age, language, and various intersections	yes	Young people accessing social care are more likely to be young carers and so reduction in

		these services may have a disproportionate impact for these children
Looked after children, Care Leavers, Care and fostering experienced people considering for age, language, and various intersections	yes	Social care services support children in care and care leavers and so reduction in these services may have a disproportionate impact for these children
Domestic and/or sexual abuse and violence survivors	yes	Young people in social care services are more likely to have come from families that have experienced domestic violence and are more likely to experience this in their own relationships
Socio-economic disadvantage considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections	yes	Young people accessing social care services are more likely to have come from families in poverty, therefore any cuts in adolescent services will impact on those children affected by childhood poverty
Homeless and rough sleepers considering for age, veteran, ethnicity, language, and various intersections	yes	Young people accessing the social care services are often at risk of homelessness and so reduction in these services may have a disproportionate impact for these children
Human Rights	n/a	n/a
Another relevant group: Substance misuse	Yes	Young people accessing social care services are more likely to have come from families who have experienced substance misuse and are more likely to have experienced these issues themselves

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

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

Cumulative impacts

Are there other budget proposals from other service areas that might worsen or mitigate the impacts from your proposal? Please give a brief description including name of other service(s).

Savings against the Partners in Change Hub and Professional Education Consultants will impact on the support for social workers to make a difference for families and this will be worsened by other proposed reductions in the Family Help and Protection establishment, such as loss of a post in the Extended Adolescent Service, leading to the risk of an increase in the number of young people experiencing significant harm and escalating through the service, worsening the impact of these budget proposals.

Action planning

What SMART actions will be taken to mitigate the disproportionate impacts identified in section 3? If no mitigating action is possible, please state and explain why. Add additional rows as required.

SMART action 1: We are a demand led service and are therefore not able to reduce the demand as such. While we do everything possible to prevent children requiring our support, at times children will need to be safeguarded. By July 2026, we will implement the Families Transformation. Families First is a national programme led by the Department for Education (DfE). The overall aims of Families First are to refocus the children's social care system on prevention and to ensure that there is a robust multi-agency child protection system in place. As part of Families First we will create Family Help pods that focus on targeted early help and social work support, as well as creating a Multi-Agency Child Protection Team, which will have oversight of child protection decisions. One of the expected outcomes of Families First is that it will lead to a reduction in demand for high level services and this would include a reduction in need from the Partners in Change Hub and recruitment of newly qualified social workers.
SMART action 2: By July 2026, we will create Change Practitioner roles in the Partners in Change Hub to help reduce demand on children's social care.

Outcome of your assessment

Based on the information above give the proposal an impact score between 1 – 5.

1= proposal has minimal impact and/or mitigating actions will significantly minimise the impact

3= proposal will have a significant negative impact; however, mitigation actions will reduce the impact considerably.

5= proposal has significant impact and mitigating actions will have limited effect on reducing impact.

Proposal's impact score:	4

Publication

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

Directorate and Service Approval

Signatory:	**Name and Job Title:**	**Date:** DD-MMM-YY

Responsible Lead Officer:	Kirsty Hanna	24.10.25
Accountable Manager:	Kirsty Hanna	24.10.25

Budget Proposal: EIA 4	
Title of budget saving being assessed:	**Reduction of Youth Arts programme**
Name and title of officer responsible for this EIA:	Kirsty Hanna
Directorate and Service Name:	Families, Children and Wellbeing

Briefly describe the budget saving proposal:

The proposal is to reduce the Youth Arts Programme through change to staffing establishment: removal of 0.8 FTE, currently vacant. The Youth Participation Team provide a range of services for children and young people who are/have been in care or receiving social work support; this includes youth advocacy, Children in Care Council, Independent Visitor Programme. The service also provides an accredited Youth Arts Programme and wider participation activities, e.g. Youth Council, Youth Wise.

The Youth Arts Award Programme targets young people aged 11 to 19 years (SEND up to 25 years) particularly Children in Care (CiC), Care leavers (with SEND) or young people who are emotionally distressed and are disengaged from education, training or employment. The staff (1.21fte) deliver and accredit the bronze, silver & Gold awards and their aim is to improve mental health and to re-engage the young people into education, training and increase employment opportunities

Summarise the most significant impacts identified by this assessment including which groups will be disproportionally negatively affected drawing out intersectional impacts as applicable:

This would result in a loss of opportunity for the most vulnerable children living in the city, including CiC, who are disengaged from education, to achieve a nationally accredited award and reintegrate them back into education, training or employment.

15 young people have been supported since April 2025.

In addition to CiC, the information provided highlights that young people aged 11 to 19 years (SEND up to 25 years), particularly LGBTQ+ young people, those living in poverty, young people with poor mental health, young women and young people with SEND will be disproportionately impacted.

Consultation, engagement and supporting EIAs

What consultations or engagement activities are being used to inform this assessment?

If consultation is planned or in process – state this and state when it will done/completed even if indicative. If no consultation completed or planned, state this, giving an explanation.

There has been no consultation but there is an ongoing youth review taking place between September and December 2025

What other budget or service EIAs can assist/have been used to inform this assessment?

N/A

Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this proposal?

Consider all possible intersections (Delete and State Yes, No, Not Applicable)

Age	Yes
Disability and inclusive adjustments, coverage under equality act and not	Yes
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	No
Religion, Belief, Spirituality, Faith, or Atheism	No
Gender Identity and Sex (including non-binary and Intersex people)	Yes
Gender Reassignment	Yes
Sexual Orientation	Yes
Marriage and Civil Partnership	No
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	No
Armed Forces Personnel, their families, and Veterans	No
Expatriates, Migrants, Asylum Seekers, and Refugees	No
Carers	No
Looked after children, Care Leavers, Care and fostering experienced people	Yes
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	No
Socio-economic Disadvantage	Yes
Homelessness and associated risk and vulnerability	No

Human Rights	No
Another relevant group (please specify here and add additional rows as needed)	Yes Children not engaged with education

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

- People being housebound due to disabilities or disabling circumstances
- Environmental barriers or mobility barriers impacting those with sight loss, D/deafness, sensory requirements, neurodivergence, various complex disabilities
- Ex-offenders and people with unrelated convictions
- Lone parents
- People experiencing homelessness
- People facing literacy and numeracy barriers
- People on a low income and people living in the most deprived areas
- People who have experienced female genital mutilation (FGM)
- People who have experienced human trafficking or modern slavery
- People with experience of or living with addiction and/ or a substance use disorder (SUD)
- Sex workers

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

Data for children in care and children open to Family Help will be considered at performance boards

What are the arrangements for monitoring, and reviewing the impact of this proposal?

Via monitoring if the virtual school team are reaching this targeted group and if they are able to offer alternative programmes, numbers, demographics and accreditations gained will be evaluated within this service.

Through the SEND and Alternative Provision change programme.

The Youth Participation team will monitor requests/referrals for support within the groups of young people adversely affected, the numbers of request that can be referred on to other services and report any gaps in support for those young people.

Possible increase in complaints if the service is no longer available/ further limiting options for those very vulnerable groups of young people, as listed previously.

Impacts

Briefly state source of data or data analysis being used to describe the disproportionate negative impacts. Preferably provide link to data/ analysis if open data source.

Data and analysis sources may include (not an exhaustive list):

- **Consider a wide range (including but not limited to):**
- Population and population groups
- Census 2021 population groups Infogram: Brighton & Hove by Brighton and Hove City Council
- Census and local intelligence data
- Service specific data
- Community consultations
- Insights from customer feedback including complaints and survey results
- Lived experiences and qualitative data
- Joint Strategic Needs Assessment (JSNA) data
- Health Inequalities data
- Good practice research
- National data and reports relevant to the service
- Workforce, leaver, and recruitment data, surveys, insights
- Feedback from internal 'staff as residents' consultations
- Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
- Insights, gaps, and data analyses on 'who' the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.

Assess impact for different population groups	**Is there a possible disproportionate negative impact?** **State Yes or No**	**Describe the potential negative impact, considering for differences within groups For example, different ethnic groups, and peoples intersecting identities e.g. disabled women of faith** **OR** **If no impact is identified, briefly state why.**
Age including those under 16, young adults, multiple ethnicities, those with various intersections.	Yes	This project targets young people aged 11 to 19 years (SEND up to 25 years). There would be reduction in the number of young people being supported to achieve a nationally accredited award and reintegrate them back into education, training or employment

Disability includes physical and sensory disabled, D/deaf, deafened, hard of hearing, blind, neurodiverse people, people with non-visible disabilities.	Yes	The award is carefully tailored and delivered to meet each individual young person's needs, resulting in a high level of success in engaging and sustaining participation from disabled young people and particularly autistic young people.
Ethnicity, 'Race', ethnic heritage including Gypsy, Roma, Travellers	Yes	Black and Global Majority Children are over-represented in our services and this is especially the case for children of mixed heritage or from Gypsy, Roma, Traveller backgrounds.
Religion, Spirituality, Faith, Atheism, and philosophical belief	No	
Sex	Yes	The Arts Award predominantly supports young women who could be disproportionally impacted with the reduction
Gender Reassignment	Yes	A number of trans and non-binary young people use the service
Sexual Orientation	Yes	A number of children in care identify as LGBTQ and these young people will often also have additional needs and vulnerability
Marriage and Civil Partnership	No	
Pregnancy, Maternity, Paternity, Adoption, Menopause, (In)fertility (across intersections and non-binary gender spectrum)	No	
Armed Forces Personnel, their families, and Veterans	No	
Expatriates, Migrants, Asylum Seekers, and Refugees considering for age, language, and various intersections	No	
Carers considering for age, language, and various intersections	Yes	Young people accessing social care are more likely to be young carers

Looked after children, Care Leavers, Care and fostering experienced people considering for age, language, and various intersections	Yes	The programme supports young people from these groups who could be impacted by the reduction
Domestic and/or sexual abuse and violence survivors	Yes	Young people in social care services are more likely to have come from families that have experienced domestic violence
Socio-economic disadvantage considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections	Yes	Young people accessing social care services are more likely to have come from families in poverty
Homeless and rough sleepers considering for age, veteran, ethnicity, language, and various intersections	No	
Human Rights	No	
Another relevant group (please specify here and add additional rows as needed)	Yes	This programme targets young people presenting with emotional distress (poor mental health), CiC, Care Leavers (with SEND) and other vulnerable young people that are disengaged from education, training or employment. This would reduce the number being supported to achieve a nationally accredited award and reintegrate them back into education, training or employment The award is carefully tailored and delivered to meet each individual young person's needs, resulting in a high level of success in engaging and sustaining participation from young people with severe mental health issues including young people who find engaging with other services difficult.

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

- Ex-offenders and people with unrelated convictions
- Lone parents
- People experiencing homelessness
- People facing literacy and numeracy barriers

- People on a low income and people living in the most deprived areas
- People who have experienced female genital mutilation (FGM)
- People who have experienced human trafficking or modern slavery
- People with experience of or living with addiction and/ or a substance use disorder (SUD)
- Sex workers

Cumulative impacts

Are there other budget proposals from other service areas that might worsen or mitigate the impacts from your proposal? Please give a brief description including name of other service(s).

Yes, youth participation reduction of 0.5 FTE

Action planning

What SMART actions will be taken to mitigate the disproportionate impacts identified in section 3? If no mitigating action is possible, please state and explain why. Add additional rows as required.

2. SMART action 1: Consider the use of SEND and AP programme to deliver service for children not engaged in education
3. SMART action 2: Implementation of new young futures hubs to meet the needs of the young people. The programme will provide a one stop shop for support services with a focus on young people's health and wellbeing, those at risk of crime and education and employment from 1st April 2026 and complement the reduced offer.

Outcome of your assessment

Based on the information above give the proposal an impact score between 1 – 5.

1= proposal has minimal impact and/or mitigating actions will significantly minimise the impact

3= proposal will have a significant negative impact; however, mitigation actions will reduce the impact considerably.

5= proposal has significant impact and mitigating actions will have limited effect on reducing impact.

Proposal's impact score:	1

Publication

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

Directorate and Service Approval

Signatory:	**Name and Job Title:**	**Date:** DD-MMM-YY
Responsible Lead Officer:	Joanne Templeman	18 November 2025
Accountable Manager:	Kirsty Hanna	18 November 2025

Budget Proposal: EIA 5	
Title of budget saving being assessed:	Violence Against Women and Girls Budget
Name and title of officer responsible for this EIA:	Anne Clark, Strategic Lead Commissioner VAWG
Directorate and Service Name:	Families, Children & Wellbeing

Briefly describe the budget saving proposal:

£75,000 saving by reducing funding for Pan Sussex posts associated with the Pan Sussex Domestic Abuse Board and funding the Transformation Manager post at Stonewater Refuge. The project work of this post has now reached completion.

Summarise the most significant impacts identified by this assessment including which groups will be disproportionally negatively affected drawing out intersectional impacts as applicable:

This reduction in budget will impact on the partnership contributions to the Board and may mean that East and West Sussex County Councils will have to increase their contributions. The Council has been contributing to the Pan Sussex Domestic Abuse Board Manager and Community Engagement Officer role. Both roles are line managed via West Sussex Council and focus primarily on East and West Sussex engagement. Officers from Brighton and Hove will continue to be a member of the Board. There is no significant impact on the wider groups in the community. The work of the Transformation Manager has completed so there is no impact from this saving.

Consultation, engagement and supporting EIAs

What consultations or engagement activities are being used to inform this assessment?

If consultation is planned or in process – state this and state when it will done/completed even if indicative. If no consultation completed or planned, state this, giving an explanation.

No consultation is planned, however, we will consult with Pan Sussex Partners to advise of this development.

What other budget or service EIAs can assist/have been used to inform this assessment?

None

Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this proposal?

Consider all possible intersections (Delete and State Yes, No, Not Applicable)

Age	No

Disability and inclusive adjustments, coverage under equality act and not	No
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	No
Religion, Belief, Spirituality, Faith, or Atheism	No
Sex	Yes, all postholders are females who are affected
Gender Reassignment	No
Sexual Orientation	No
Marriage and Civil Partnership	No
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	No
Armed Forces Personnel, their families, and Veterans	Not applicable
Expatriates, Migrants, Asylum Seekers, and Refugees	No
Carers	No
Looked after children, Care Leavers, Care and fostering experienced people	No
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	YES
Socio-economic Disadvantage	No
Homelessness and associated risk and vulnerability	No
Human Rights	Not applicable
Another relevant group: **Those experiencing substance misuse**	No

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

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

- People with experience of or living with addiction and/ or a substance use disorder (SUD)
- Sex workers

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

There is not a process that will capture data on how a decision not to fund these posts will impact those with protected characteristics.

What are the arrangements for monitoring, and reviewing the impact of this proposal?

This will be monitored through ongoing partnership engagement with the Pan Sussex Board.

Impacts

Briefly state source of data or data analysis being used to describe the disproportionate negative impacts. Preferably provide link to data/ analysis if open data source.

Data and analysis sources may include (not an exhaustive list):

- **Consider a wide range (including but not limited to):**
- Census and local intelligence data
- Service specific data
- Community consultations
- Insights from customer feedback including complaints and survey results
- Lived experiences and qualitative data
- Joint Strategic Needs Assessment (JSNA) data
- Health Inequalities data
- Good practice research
- National data and reports relevant to the service
- Workforce, leaver, and recruitment data, surveys, insights
- Feedback from internal ‘staff as residents’ consultations
- Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
- Insights, gaps, and data analyses on ‘who’ the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.

Assess impact for different population groups	**Is there a possible disproportionate negative impact?** **State Yes or No**	**Describe the potential negative impact, considering for differences within groups For example, different ethnic groups, and peoples intersecting identities e.g. disabled women of faith** **OR** **If no impact is identified, briefly state why.**

Age including those under 16, young adults, multiple ethnicities, those with various intersections.	No	These roles do not provide support to those affected by VAWG
Disability includes physical and sensory disabled, D/deaf, deafened, hard of hearing, blind, neurodiverse people, people with non-visible disabilities.	No	These roles do not provide support to those affected by disability
Ethnicity, 'Race', ethnic heritage including Gypsy, Roma, Travellers	No	These roles do not provide support to people
Religion, Spirituality, Faith, Atheism, and philosophical belief	no	As above
Gender and Sex including non-binary and intersex people	Yes	Although the majority of people affected by VAWG are female, these posts do not work directly with those affected by VAWG to provide support.
Gender Reassignment	No	These roles do not provide support to people
Sexual Orientation	No	These roles do not provide support to people
Marriage and Civil Partnership	No	These roles do not provide support to people
Pregnancy, Maternity, Paternity, Adoption, Menopause, (In)fertility (across intersections and non-binary gender spectrum)	No	These roles do not provide support to people
Armed Forces Personnel, their families, and Veterans	No	These roles do not provide support to people
Expatriates, Migrants, Asylum Seekers, and Refugees considering for age, language, and various intersections	No	These roles do not provide support to people

Carers considering for age, language, and various intersections	No	These roles do not provide support to people
Looked after children, Care Leavers, Care and fostering experienced people considering for age, language, and various intersections	No	These roles do not provide support to people
Domestic and/or sexual abuse and violence survivors	yes	These roles work to support the implementation of the Pan Sussex Domestic Abuse Strategy and administrate the Pan Sussex Domestic Abuse Board. There is minimal interface with those affected currently by Domestic Abuse. However, withdrawing financial support for these functions may mean that there is a minimal impact on those affected by DA in the City.
Socio-economic disadvantage considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections	No	These roles do not provide support to people
Homeless and rough sleepers considering for age, veteran, ethnicity, language, and various intersections	No	These roles do not provide support to people
Human Rights	n/a	n/a
Another relevant group: Substance misuse	No	These roles do not provide support to people

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

- Ex-offenders and people with unrelated convictions
- Lone parents
- People experiencing homelessness
- People facing literacy and numeracy barriers
- People on a low income and people living in the most deprived areas
- People who have experienced female genital mutilation (FGM)

- People who have experienced human trafficking or modern slavery
- People with experience of or living with addiction and/ or a substance use disorder (SUD)
- Sex workers

Cumulative impacts

Are there other budget proposals from other service areas that might worsen or mitigate the impacts from your proposal? Please give a brief description including name of other service(s).

No

Action planning

What SMART actions will be taken to mitigate the disproportionate impacts identified in section 3? If no mitigating action is possible, please state and explain why. Add additional rows as required.

1. SMART action 1: Brighton and Hove City Council's VAWG Unit will continue to support the Pan Sussex Board and attend its meetings and subgroups.
2. SMART ACTION 2: The workload of VAWG Unit staff will continue to be monitored and we will continue to work to ensure those affected by Domestic and sexual violence are not disadvantaged by these budget saving proposals.

Outcome of your assessment

Based on the information above give the proposal an impact score between 1 – 5.

1= proposal has minimal impact and/or mitigating actions will significantly minimise the impact

3= proposal will have a significant negative impact; however, mitigation actions will reduce the impact considerably.

5= proposal has significant impact and mitigating actions will have limited effect on reducing impact.

Proposal's impact score:	1

Publication

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

Directorate and Service Approval

Signatory:	**Name and Job Title:**	**Date:** DD-MMM-YY
Responsible Lead Officer:	Anne Clark	30.10. 2025
Accountable Manager:	Anne Clark	30.10. 2025

Budget Proposal: EIA 6	
Title of budget saving being assessed:	**Community Care Budget**
Name and title of officer responsible for this EIA:	Steve Hook, Director of Adult Social Care
Directorate and Service Name:	Health and Adult Social Care, Operations

Briefly describe the budget saving proposal:

The overall net budget for this service area is £77.2m and the proposed saving for 2026/27 is **£2.296m**.

This is proposed to be done by continuing with the agreed direction of travel for Adult Social Care focusing upon reducing demand through several approaches:

- reduction of long-term care placements in nursing and residential care, particular focus on working age service users
- ensure reviews demonstrate support services are adequate to meet needs and represent efficiency and value for money
- increase the reablement offer to those who require it
- managing provider fee uplifts considering the current market fee position
- focus on preventative interventions and promoting independence in line with the target operating model, including advice, and signposting and increasing the use of technology enabled care

Summarise the most significant impacts identified by this assessment including which groups will be disproportionally negatively affected drawing out intersectional impacts as applicable:

Older people, disabled people and carers are groups who are affected when changes are made in Adult Social Care, considering intersectional impacts. However, due to the nature of these changes being focused on prevention of admission into long term residential and nursing care, promoting independence in the community and ensuring value for money, there are no identified negative disproportionate impacts for these groups.

Consultation, engagement and supporting EIAs

What consultations or engagement activities are being used to inform this assessment?

If consultation is planned or in process – state this and state when it will done/completed even if indicative. If no consultation completed or planned, state this, giving an explanation.

Continued engagement with partners, people with learning disabilities and their families through the Learning Disability Partnership Board.

We regularly engage with care and support providers and will continue our ongoing engagement. We will continue to negotiate with providers throughout the year on fee uplift requests so that services can continue to meet the care and support needs of the individuals within their care.

What other budget or service EIAs can assist/have been used to inform this assessment?

None

Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this proposal?

Consider all possible intersections (Delete and State Yes, No, Not Applicable)

Age	YES
Disability and inclusive adjustments, coverage under equality act and not	YES
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	YES
Religion, Belief, Spirituality, Faith, or Atheism	YES
Gender Identity and Sex (including non-binary and Intersex people)	YES
Gender Reassignment	NO
Sexual Orientation	YES
Marriage and Civil Partnership	NO
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	Not applicable
Armed Forces Personnel, their families, and Veterans	NO
Expatriates, Migrants, Asylum Seekers, and Refugees	NO
Carers	YES
Looked after children, Care Leavers, Care and fostering experienced people	Not applicable
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	NO
Socio-economic Disadvantage	NO
Homelessness and associated risk and vulnerability	YES
Human Rights	NO

Another relevant group (please specify here and add additional rows as needed)	NO

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

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

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

Equalities data is gathered in line with statutory guidelines as indicated by DHSC and NHSE. Assessments and reviews of individuals gather further information to fully understand the strengths and needs of each person requiring care and support. Although this is not monitored currently for trends and analysis, each individual’s needs are considered throughout their care and support planning. Where we do not have data available, we will seek to improve this and continue to engage with people in the community to understand the impacts further.

What are the arrangements for monitoring, and reviewing the impact of this proposal?

The Director for Adult Social Care (DASS) retains the responsibility for professional leadership and operational delivery for meeting statutory need and will ensure governance arrangements support social work professional practice to ensure that statutory duties and responsibilities are appropriately met and best practice is followed.

Delivery of these savings will be monitored corporately by savings delivery board, alongside other strategic programmes

We will continue to review the impacts of this proposal through annual service user surveys and bi-annual carer surveys, as well as monitoring compliments and complaints. We will also gather stakeholder feedback through existing partnership boards and forums. Any impacts to individuals are assessed through reviews and care and support planning.

Impacts

Briefly state source of data or data analysis being used to describe the disproportionate negative impacts. Preferably provide link to data/ analysis if open data source.

Data and analysis sources may include (not an exhaustive list):

- **Consider a wide range (including but not limited to):**

- Census and local intelligence data
- Service specific data
- Community consultations
- Insights from customer feedback including complaints and survey results
- Lived experiences and qualitative data
- Joint Strategic Needs Assessment (JSNA) data
- Health Inequalities data
- Good practice research
- National data and reports relevant to the service
- Workforce, leaver, and recruitment data, surveys, insights
- Feedback from internal 'staff as residents' consultations
- Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
- Insights, gaps, and data analyses on 'who' the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.

Assess impact for different population groups	**Is there a possible disproportionate negative impact?** **State Yes or No**	**Describe the potential negative impact, considering for differences within groups For example, different ethnic groups, and peoples intersecting identities e.g. disabled women of faith** **OR** **If no impact is identified, briefly state why.**
Age including those under 16, young adults, multiple ethnicities, those with various intersections.	No	Focus on prevention of admission into long term residential and nursing care and promoting independence in the community.
Disability includes physical and sensory disabled, D/deaf, deafened, hard of hearing, blind, neurodiverse people, people with non-visible disabilities.	No	Focus on prevention of admission into long term residential and nursing care and promoting independence in the community.
Ethnicity, 'Race', ethnic heritage including Gypsy, Roma, Travellers	No	

Religion, Spirituality, Faith, Atheism, and philosophical belief	No	
Gender and Sex including non-binary and intersex people	No	
Gender Reassignment	No	
Sexual Orientation	No	
Marriage and Civil Partnership	No	
Pregnancy, Maternity, Paternity, Adoption, Menopause, (In)fertility (across intersections and non-binary gender spectrum)	No	
Armed Forces Personnel, their families, and Veterans	No	
Expatriates, Migrants, Asylum Seekers, and Refugees considering for age, language, and various intersections	No	
Carers considering for age, language, and various intersections	No	
Looked after children, Care Leavers, Care and fostering experienced people considering for age, language, and various intersections	No	
Domestic and/or sexual abuse and violence survivors	No	
Socio-economic disadvantage considering for age, disability, D/deaf/ blind, ethnicity, expatriate	No	

background, and various intersections		
Homeless and rough sleepers considering for age, veteran, ethnicity, language, and various intersections	No	
Human Rights	No	
Another relevant group (please specify here and add additional rows as needed)	No	

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

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

Cumulative impacts

Are there other budget proposals from other service areas that might worsen or mitigate the impacts from your proposal? Please give a brief description including name of other service(s).

There is a significant reorganisation of Integrated Care Boards as part of a national programme. Locally that will involve Sussex ICB merging with Surrey Heartlands ICB. This will be closely monitored through Integrated Health Governance in partnership with Brighton & Hove City Council.

Action planning

What SMART actions will be taken to mitigate the disproportionate impacts identified in section 3? If no mitigating action is possible, please state and explain why. Add additional rows as required.

1. No mitigation actions are available due to: no disproportionate impacts identified

Outcome of your assessment

Based on the information above give the proposal an impact score between 1 – 5.

1= proposal has minimal impact and/or mitigating actions will significantly minimise the impact

3= proposal will have a significant negative impact; however, mitigation actions will reduce the impact considerably.

5= proposal has significant impact and mitigating actions will have limited effect on reducing impact.

Proposal's impact score:	1

Publication

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

Directorate and Service Approval

Signatory:	**Name and Job Title:**	**Date:** DD-MMM-YY
Responsible Lead Officer:	Steve Hook, Director Adult Social Care	06-11-2025
Accountable Manager:	Genette Laws, Corporate Director Homes & Adult Social Care	06-11-2025

Budget Proposal: EIA 7

Title of budget saving being assessed:	Housing Demand Management
Name and title of officer responsible for this EIA:	Harry Williams, Director of Housing People Services
Directorate and Service Name:	Homes & Adult Social Care – Housing People Services

Briefly describe the budget saving proposal:

4 key workstreams which will deliver savings in Homelessness, Rough Sleeping and Temporary Accommodation and the proposed saving totals £5.143m:

- Increasing supply: of more affordable Temporary Accommodation (delivery of the Dynamic Purchasing System, exempt accommodation, EPC Grant Scheme & Council owned TA
- Reducing unit cost: of existing Temporary Accommodation: delivery of Greenwich Model & TA Charging Policy
- Improving effectiveness in prevention homelessness: Reduce households placed in Temporary Accommodation with new Housing Advice Team
- Accelerating move on from Temporary Accommodation: direct offers of social housing to households in Interim Accommodation

Summarise the most significant impacts identified by this assessment including which groups will be disproportionally negatively affected drawing out intersectional impacts as applicable:

All households accessing help with housing and homelessness from the council could access and therefore be impacted by this policy. However, the data shows that there are a number of groups most likely to experience homelessness and would more likely take up this offer and be impacted by the policy. These groups are:

- People aged between 25 and 44
- Disabled people
- Single parent households
- Black, Caribbean, African residents and residents of ‘other ethnic groups’
- Women
- Other groups including survivors of Domestic Violence and Abuse; care leavers and people with substance misuse issues.

The initiative works on a consent basis and households have the choice to refuse or not proceed the offer.

Consultation, engagement and supporting EIAs

What consultations or engagement activities are being used to inform this assessment?

If consultation is planned or in process – state this and state when it will done/completed even if indicative. If no consultation completed or planned, state this, giving an explanation.

Consultation has been completed recently on Homelessness & Rough Sleeping Strategy

What other budget or service EIAs can assist/have been used to inform this assessment?

None

Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this proposal?

Consider all possible intersections (Delete and State Yes, No, Not Applicable)

Age	Yes
Disability and inclusive adjustments, coverage under equality act and not	Yes
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	Yes
Religion, Belief, Spirituality, Faith, or Atheism	Yes
Gender Identity and Sex (including non-binary and Intersex people)	Yes
Gender Reassignment	Yes
Sexual Orientation	Yes
Marriage and Civil Partnership	Yes
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	Yes
Armed Forces Personnel, their families, and Veterans	Yes
Expatriates, Migrants, Asylum Seekers, and Refugees	Yes
Carers	Yes
Looked after children, Care Leavers, Care and fostering experienced people	Yes
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	Yes
Socio-economic Disadvantage	Yes
Homelessness and associated risk and vulnerability	Yes
Human Rights	Not applicable

Another relevant group (please specify here and add additional rows as needed)	Yes

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

- People being housebound due to disabilities or disabling circumstances
- Environmental barriers or mobility barriers impacting those with sight loss, D/deafness, sensory requirements, neurodivergence, various complex disabilities
- Ex-offenders and people with unrelated convictions
- Lone parents
- People experiencing homelessness
- People facing literacy and numeracy barriers
- People on a low income and people living in the most deprived areas
- People who have experienced female genital mutilation (FGM)
- People who have experienced human trafficking or modern slavery
- People with experience of or living with addiction and/ or a substance use disorder (SUD)
- Sex workers

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

Not applicable

What are the arrangements for monitoring, and reviewing the impact of this proposal?

Director for Housing People services will have responsibility for delivery of this programme and will monitor progress through Housing People Services Performance Management Framework (currently in development) and Service Plans. We will continue to monitor customer contact including complaints and Councillor Enquiries. Delivery of these savings will be monitored corporately by savings delivery board, alongside other strategic programmes

Impacts

Briefly state source of data or data analysis being used to describe the disproportionate negative impacts. Preferably provide link to data/ analysis if open data source.

Data and analysis sources may include (not an exhaustive list):

- **Consider a wide range (including but not limited to):**
- Population and population groups
- Census 2021 population groups Infogram: Brighton & Hove by Brighton and Hove City Council

- Census and local intelligence data
- Service specific data
- Community consultations
- Insights from customer feedback including complaints and survey results
- Lived experiences and qualitative data
- Joint Strategic Needs Assessment (JSNA) data
- Health Inequalities data
- Good practice research
- National data and reports relevant to the service
- Workforce, leaver, and recruitment data, surveys, insights
- Feedback from internal 'staff as residents' consultations
- Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
- Insights, gaps, and data analyses on 'who' the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.

Assess impact for different population groups	**Is there a possible disproportionate negative impact?** **State Yes or No**	**Describe the potential negative impact, considering for differences within groups For example, different ethnic groups, and peoples intersecting identities e.g. disabled women of faith** **OR** **If no impact is identified, briefly state why.**
Age including those under 16, young adults, multiple ethnicities, those with various intersections.	No	
Disability includes physical and sensory disabled, D/deaf, deafened, hard of hearing, blind, neurodiverse people, people with non-visible disabilities.	Yes	*In Brighton & Hove, disabled people disproportionately experience homelessness and are therefore more likely to be impacted by this programme.*
Ethnicity, 'Race', ethnic heritage including Gypsy, Roma, Travellers	Yes	*In Brighton & Hove, Black, Caribbean, African residents and residents of 'Other ethnic group' disproportionately experience homelessness and*

		are therefore more likely to be impacted by this programme.
Religion, Spirituality, Faith, Atheism, and philosophical belief	No	
Gender and Sex including non-binary and intersex people	Yes	*Women are disproportionately represented among lead homeless applicants and are therefore more likely to be impacted by this programme.*
Gender Reassignment	Yes	*The number of people indicating that their gender identity is different from their sex registered at birth in Brighton & Hove is more than three times greater than the average across of England.* *Brighton & Hove is home to health services, charities and peer support services for LGBTQ+ residents.*
Sexual Orientation	Yes	*Brighton & Hove is home to health services, charities and peer support services for LGBTQ+ residents.*
Marriage and Civil Partnership	No	
Pregnancy, Maternity, Paternity, Adoption, Menopause, (In)fertility (across intersections and non-binary gender spectrum)	Yes	*In Brighton & Hove, single parent households disproportionately experience homelessness and are therefore more likely to be impacted by this policy.*
Armed Forces Personnel, their families, and Veterans	No	
Expatriates, Migrants, Asylum Seekers, and Refugees considering for age, language, and various intersections	No	
Carers considering for age, language, and various intersections	No	
Looked after children, Care Leavers, Care and fostering experienced people considering for age,	No	

language, and various intersections		
Domestic and/or sexual abuse and violence survivors	Yes	*9% of applicants to Brighton & Hove City Council between April and December 2024 –were found to have a priority need for accommodation as a result of being homeless due to that person being a victim of domestic abuse.*
Socio-economic disadvantage considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections	No	
Homeless and rough sleepers considering for age, veteran, ethnicity, language, and various intersections	Yes	Implications outlined above.
Human Rights	No	
Another relevant group (please specify here and add additional rows as needed)	No	

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

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

Cumulative impacts

Are there other budget proposals from other service areas that might worsen or mitigate the impacts from your proposal? Please give a brief description including name of other service(s).

To be reviewed once all savings proposals are drafted

Action planning

What SMART actions will be taken to mitigate the disproportionate impacts identified in section 3? If no mitigating action is possible, please state and explain why. Add additional rows as required.

1. No mitigation actions are available due to: no disproportionate impacts identified beyond what we are already experiencing within services

Outcome of your assessment

Based on the information above give the proposal an impact score between 1 – 5.

1= proposal has minimal impact and/or mitigating actions will significantly minimise the impact

3= proposal will have a significant negative impact; however, mitigation actions will reduce the impact considerably.

5= proposal has significant impact and mitigating actions will have limited effect on reducing impact.

Proposal's impact score:	2

Publication

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

Directorate and Service Approval

Signatory:	**Name and Job Title:**	**Date:** DD-MMM-YY
Responsible Lead Officer:	Harry Williams, Director of Housing People Services – Homelessness & Housing Options	06-11-2025
Accountable Manager:	Genette Laws – Corporate Director Homes & Adult Social Care	06-11-2025

Budget Proposal: EIA 8

Title of budget saving being assessed:	Introduce/review car parking charges at Victoria Park and other City Parks sites
Name and title of officer responsible for this EIA:	Mike Harris, Head of Parks and Leisure
Directorate and Service Name:	City Operations, Parks & Leisure

Briefly describe the budget saving proposal:

Introduce/review car parking charges at Victoria Park and other City Parks sites, e.g. Lower and Upper Waterhall, Wild Park, Saunders Park, Rottingdean Recreation Ground, Happy Valley, Easthill Park, Sheepcote Valley car park and view point, Devils Dyke x 2 parking areas, Castle Hill car park.

Summarise the most significant impacts identified by this assessment including which groups will be disproportionally negatively affected drawing out intersectional impacts as applicable:

Where parking is a problem, access for park users can be impacted by blocking dropped kerbs and pedestrian walk ways. The enforcement of marked parking bays and double yellow lines ensures that parking is limited to spaces which enable better access for all and provision of disabled bays or wider access bays in suitable locations for park users.

At Victoria Recreation Ground the Victoria Road site is managed by One Parking Solutions (OPS), the site has restrictive parking hours (2 hours max stay) and these are reputedly limiting the use of the playground and bowling ground. The Bowls Pavillion has been allowed 8 permits for parking to be included in their lease but have failed to sign the lease in 2 years, which means we have received no income or benefit for this unusual concession.

Displacement effects may negatively affect residential areas in Portslade, Rottingdean and Woodingdean which are not already in a parking management zone.

Lack of access to smartphones can limit access due to reliance on paybyphone in paid parking in our public parks.
Low income /living in a deprived area having limited access to high quality natural environment and not being able to afford paid parking is a cumulative impact of cost of living increases.

Consultation, engagement and supporting EIAs

What consultations or engagement activities are being used to inform this assessment?

If consultation is planned or in process – state this and state when it will done/completed even if indicative. If no consultation completed or planned, state this, giving an explanation.

Early engagement with disability and access forums and the Community Engagement Team to identify best community forums to speak to will help to inform the draft parking design.
To make a new Traffic Regulation Order we advertise proposals for new restrictions in a public notice. You can comment on the proposals during a 21 day period. The comments are considered by the Project Team. If there are 6 or more objections which cannot be answered by response and

further explanation and withdrawn the design may be altered to mitigate and approval sought from senior officers/ members or withdrawn. If the proposals are approved, we seal the traffic regulation order and make the necessary changes with line marking and signage in the city.

The consultation is written in Plain English and notices with details to respond are advertised on location and in the newspaper.

Previously, the sustainable travel plan for Stanmer Park as a destination park worked with Brighton & Hove buses to provide subsidised bus routes to ensure access to the countryside, a premier heritage destinations and the engagement activities provided there.

Community Engagement survey data (e.g. Wild East) show which greenspaces people travel to and where from in the city.

What other budget or service EIAs can assist/have been used to inform this assessment?

City Infrastructure/Parking Services

Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this proposal?

Consider all possible intersections (Delete and State Yes, No, Not Applicable)

Age	NO
Disability and inclusive adjustments, coverage under equality act and not	NO
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	NO
Religion, Belief, Spirituality, Faith, or Atheism	NO
Gender Identity and Sex (including non-binary and Intersex people)	NO
Gender Reassignment	NO
Sexual Orientation	NO
Marriage and Civil Partnership	NO
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	NO
Armed Forces Personnel, their families, and Veterans	NO
Expatriates, Migrants, Asylum Seekers, and Refugees	NO
Carers	NO
Looked after children, Care Leavers, Care and fostering experienced people	No

Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	NO
Socio-economic Disadvantage	NO
Homelessness and associated risk and vulnerability	NO
Human Rights	NO
Another relevant group (please specify here and add additional rows as needed)	NO

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

- People being housebound due to disabilities or disabling circumstances
- Environmental barriers or mobility barriers impacting those with sight loss, D/deafness, sensory requirements, neurodivergence, various complex disabilities
- Ex-offenders and people with unrelated convictions
- Lone parents
- People experiencing homelessness
- People facing literacy and numeracy barriers
- People on a low income and people living in the most deprived areas
- People who have experienced female genital mutilation (FGM)
- People who have experienced human trafficking or modern slavery
- People with experience of or living with addiction and/ or a substance use disorder (SUD)
- Sex workers

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

The data may be gathered by Parking Services who receive the TRO comment or objections but is not passed on to Cityparks. Parking design and implementation, signage, lining and provision of bays are dictated by highways regulations which are national standards.

What are the arrangements for monitoring, and reviewing the impact of this proposal?

Parking Services do their own assessment of objections and complaints to the service. For example in Stanmer Park, the reintroduction of paid parking machines in 2 locations to respond to complaints about age biased digital access.

Impacts

Briefly state source of data or data analysis being used to describe the disproportionate negative impacts. Preferably provide link to data/ analysis if open data source.

Data and analysis sources may include (not an exhaustive list):

- **Consider a wide range (including but not limited to):**

- Population and population groups
- Census 2021 population groups Infogram: Brighton & Hove by Brighton and Hove City Council
- Census and local intelligence data
- Service specific data
- Community consultations
- Insights from customer feedback including complaints and survey results
- Lived experiences and qualitative data
- Joint Strategic Needs Assessment (JSNA) data
- Health Inequalities data
- Good practice research
- National data and reports relevant to the service
- Workforce, leaver, and recruitment data, surveys, insights
- Feedback from internal 'staff as residents' consultations
- Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
- Insights, gaps, and data analyses on 'who' the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.

Assess impact for different population groups	**Is there a possible disproportionate negative impact?** **State Yes or No**	**Describe the potential negative impact, considering for differences within groups For example, different ethnic groups, and peoples intersecting identities e.g. disabled women of faith** **OR** **If no impact is identified, briefly state why.**
Age including those under 16, young adults, multiple ethnicities, those with various intersections.	Yes	Young people and older people are more likely to be on low incomes and therefore more likely to be adversely impacted by any parking charges. Age UK tell us that many older people face a difficult existence in retirement as a result of having a limited income combined with the extra costs of ageing. Introducing paid parking at city park locations may add to older people's financial pressures and limit / deter them from visiting. Older residents may be more likely to be digital excluded - Parking Services have plans to address this in some locations.

Disability includes physical and sensory disabled, D/deaf, deafened, hard of hearing, blind, neurodiverse people, people with non-visible disabilities.	Yes	Research carried out by Scope found that the cost of living with a disability or families with disabled children is significantly higher than households with no disabled people. Transport was identified as one of the main factors for this increase in costs. Introducing parking fees may add to financial pressures on these families and limit / deter them from visiting. Link to research. Disability Price Tag | Disability charity Scope UK Blue badges are issued to disabled people who are drivers or non-drivers allowing free parking for an unlimited amount of time in pay and display bays and parking in disabled bays.
Ethnicity, 'Race', ethnic heritage including Gypsy, Roma, Travellers	No	
Religion, Spirituality, Faith, Atheism, and philosophical belief	No	
Sex	No	The intersection of sex and disability and caring is a consideration. 90% of lone parent households with dependents in the city are headed up by women. The percentage of women providing unpaid care is 58% in comparison to men (42%). Introducing parking fees may add to financial pressures and limit / deter them from visiting.
Gender Reassignment	No	
Sexual Orientation	No	
Marriage and Civil Partnership	No	
Pregnancy, Maternity, Paternity, Adoption, Menopause, (In)fertility (across intersections and non-binary gender spectrum)	No	
Armed Forces Personnel, their families, and Veterans	No	
Expatriates, Migrants, Asylum Seekers, and Refugees considering for	No	

age, language, and various intersections		
Carers considering for age, language, and various intersections	Yes	Research carried out by Carers UK found that many unpaid carers experience financial hardship because of their caring role. Introduction of parking charges at city park locations may limit / deter them from visiting.
Looked after children, Care Leavers, Care and fostering experienced people considering for age, language, and various intersections	No	
Domestic and/or sexual abuse and violence survivors	No	
Socio-economic disadvantage considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections	No	
Homeless and rough sleepers considering for age, veteran, ethnicity, language, and various intersections	No	
Human Rights	No	
Another relevant group (People on a low income and people living in the most deprived areas**)**		

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

- Ex-offenders and people with unrelated convictions
- Lone parents
- People experiencing homelessness
- People facing literacy and numeracy barriers
- People on a low income and people living in the most deprived areas

- People who have experienced female genital mutilation (FGM)
- People who have experienced human trafficking or modern slavery
- People with experience of or living with addiction and/ or a substance use disorder (SUD)
- Sex workers

Cumulative impacts

Are there other budget proposals from other service areas that might worsen or mitigate the impacts from your proposal? Please give a brief description including name of other service(s).

Any other proposals related to introduction or increase of parking charges may worsen the impacts of this proposal.

Action planning

What SMART actions will be taken to mitigate the disproportionate impacts identified in section 3? If no mitigating action is possible, please state and explain why. Add additional rows as required.

SMART action 1: Engagement with park user group and community forums prior to TRO advertisement.
SMART action 2: Early engagement with identified relevant groups prior to TRO advertisement.
SMART action 3: A sustainable travel plan ensuring needs of relevant groups are addressed.

Outcome of your assessment

Based on the information above give the proposal an impact score between 1 – 5.

1= proposal has minimal impact and/or mitigating actions will significantly minimise the impact

3= proposal will have a significant negative impact; however, mitigation actions will reduce the impact considerably.

5= proposal has significant impact and mitigating actions will have limited effect on reducing impact.

Proposal's impact score:	1

Publication

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

N/A

Directorate and Service Approval

Signatory:	**Name and Job Title:**	**Date:** DD-MMM-YY
Responsible Lead Officer:	Mike Harris, Head of Parks and Leisure	20 November 2025
Accountable Manager:	Mike Harris, Head of Parks and Leisure	20 November 2025

Budget Proposal: EIA 9	
Title of budget saving being assessed:	Income from trade and garden waste
Name and title of officer responsible for this EIA:	Louise Lawrence, Head of Strategy & Service Improvement
Directorate and Service Name:	City Operations, Environmental Services

Briefly describe the budget saving proposal:

The council currently provides a chargeable fortnightly garden waste collection to residents who sign up to the service, and a chargeable waste collection service to businesses across the city with a trade waste agreement. The proposal is to increase the cost and market both services more widely to generate a surplus to reinvest in services.

There is also a proposal to introduce a fee for collection of waste from third sector organisations.

Summarise the most significant impacts identified by this assessment including which groups will be disproportionally negatively affected drawing out intersectional impacts as applicable:

It is difficult to determine the level of impact as the service is demand led, and customer equality data is not collected. There are other companies that provide garden and trade waste collections in the city. Residents can also dispose of their garden waste for free at one of the Household Waste & Recycling Sites (HWRS).

Current policy in place provides free waste collection from third sector organisations. Introduction of a fee for this service may significantly impact organisations that don't generate profit, compared with sites that are hired out for commercial activity and organisations with single outlets compared with multiple outlets.

Consultation, engagement and supporting EIAs

What consultations or engagement activities are being used to inform this assessment?

If consultation is planned or in process – state this and state when it will done/completed even if indicative. If no consultation completed or planned, state this, giving an explanation.

Consultation will be undertaken through the Council's budget setting consultation process which sets out the proposed savings and revenue raising choices that the council will need to make in order to set a balanced budget for 2026/27.

What other budget or service EIAs can assist/have been used to inform this assessment?

None

Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this proposal?

Consider all possible intersections (Delete and State Yes, No, Not Applicable)

Age	No
Disability and inclusive adjustments, coverage under equality act and not	No
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	No
Religion, Belief, Spirituality, Faith, or Atheism	No
Gender Identity and Sex (including non-binary and Intersex people)	No
Gender Reassignment	No
Sexual Orientation	No
Marriage and Civil Partnership	No
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	No
Armed Forces Personnel, their families, and Veterans	No
Expatriates, Migrants, Asylum Seekers, and Refugees	No
Carers	No
Looked after children, Care Leavers, Care and fostering experienced people	No
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	No
Socio-economic Disadvantage	No
Homelessness and associated risk and vulnerability	No
Human Rights	No
Another relevant group (please specify here and add additional rows as needed)	No

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

- People being housebound due to disabilities or disabling circumstances
- Environmental barriers or mobility barriers impacting those with sight loss, D/deafness, sensory requirements, neurodivergence, various complex disabilities
- Ex-offenders and people with unrelated convictions
- Lone parents
- People experiencing homelessness

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

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

Through the digital improvements being made to the garden waste service, opportunities for collecting this data can be explored.

What are the arrangements for monitoring, and reviewing the impact of this proposal?

Budgets will be monitored. Equality data will be collected through customer feedback / Stage 1 complaints.

Impacts

Briefly state source of data or data analysis being used to describe the disproportionate negative impacts. Preferably provide link to data/ analysis if open data source.

Data and analysis sources may include (not an exhaustive list):

- **Consider a wide range (including but not limited to):**
- Population and population groups
- Census 2021 population groups Infogram: Brighton & Hove by Brighton and Hove City Council
- Census and local intelligence data
- Service specific data
- Community consultations
- Insights from customer feedback including complaints and survey results
- Lived experiences and qualitative data
- Joint Strategic Needs Assessment (JSNA) data
- Health Inequalities data
- Good practice research
- National data and reports relevant to the service
- Workforce, leaver, and recruitment data, surveys, insights
- Feedback from internal 'staff as residents' consultations

- Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
- Insights, gaps, and data analyses on ‘who’ the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.

Assess impact for different population groups	**Is there a possible disproportionate negative impact?** **State Yes or No**	**Describe the potential negative impact, considering for differences within groups For example, different ethnic groups, and peoples intersecting identities e.g. disabled women of faith** **OR** **If no impact is identified, briefly state why.**
Age including those under 16, young adults, multiple ethnicities, those with various intersections.	No	Younger and older people may have limited income and so be disadvantaged in terms of the charges for waste.
Disability includes physical and sensory disabled, D/deaf, deafened, hard of hearing, blind, neurodiverse people, people with non-visible disabilities.	Yes	Disabled people may have lower incomes than other working age adults and so be disadvantaged in terms of the charges for waste. Disabled people are more likely to be unemployed or in low-waged work than non-disabled people.
Ethnicity, ‘Race’, ethnic heritage including Gypsy, Roma, Travellers	No	
Religion, Spirituality, Faith, Atheism, and philosophical belief	No	
Gender and Sex including non-binary and intersex people	No	
Gender Reassignment	No	
Sexual Orientation	No	
Marriage and Civil Partnership	No	
Pregnancy, Maternity, Paternity, Adoption, Menopause, (In)fertility (across intersections and	No	

non-binary gender spectrum)		
Armed Forces Personnel, their families, and Veterans	No	
Expatriates, Migrants, Asylum Seekers, and Refugees considering for age, language, and various intersections	No	
Carers considering for age, language, and various intersections	No	
Looked after children, Care Leavers, Care and fostering experienced people considering for age, language, and various intersections	No	
Domestic and/or sexual abuse and violence survivors	No	
Socio-economic disadvantage considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections	Yes	People on low incomes may be disproportionately impacted by the proposals. They may not be able to afford to pay for the service. People without access to a car may be disproportionately impacted by the proposals. They may not be able to access the HWRS to dispose of the items for free.
Homeless and rough sleepers considering for age, veteran, ethnicity, language, and various intersections	No	
Human Rights	No	
Another relevant group (please specify here and add additional rows as needed)	No	

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

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

Cumulative impacts

Are there other budget proposals from other service areas that might worsen or mitigate the impacts from your proposal? Please give a brief description including name of other service(s).

Action planning

What SMART actions will be taken to mitigate the disproportionate impacts identified in section 3? If no mitigating action is possible, please state and explain why. Add additional rows as required.

1. SMART action 1: Continue to promote other means of disposing of garden waste, such as taking to the HWRS, home composting or using another service.
2. SMART action 2: Analyse Stage 1 complaints and feedback to identify trends related to accessibility or affordability.
3. SMART action 3: Review existing approach for waste collection from third sector organisations and ensure any fees introduced are applied fairly

Outcome of your assessment

Based on the information above give the proposal an impact score between 1 – 5.

1= proposal has minimal impact and/or mitigating actions will significantly minimise the impact

3= proposal will have a significant negative impact; however, mitigation actions will reduce the impact considerably.

5= proposal has significant impact and mitigating actions will have limited effect on reducing impact.

Proposal’s impact score:	3

Publication

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

Directorate and Service Approval

Signatory:	**Name and Job Title:**	**Date:** DD-MMM-YY
Responsible Lead Officer:	Louise Lawrence, Head of Strategy and Service Improvement	24/11/25
Accountable Manager:	Rachael Joy, Director of Environmental Services	24/11/25

Budget Proposal: EIA 10	
Title of budget saving being assessed:	Introduce new charged-for services including bin replacements, wheelie bin cleaning service and Christmas tree collection.
Name and title of officer responsible for this EIA:	Louise Lawrence, Head of Strategy and Service Improvement
Directorate and Service Name:	City Operations, Environmental Services

Briefly describe the budget saving proposal:

a. Introduce a fee for customers requesting bin replacements, for which the council currently does not currently charge.

b. Introduce a new bin cleaning service available to both residents and businesses throughout the city.

c. Introduce a new charged for Christmas tree collection service for residents.

Summarise the most significant impacts identified by this assessment including which groups will be disproportionally negatively affected drawing out intersectional impacts as applicable:

Low-income households may be disproportionately negatively impacted by bin replacement charges.

It is difficult to determine the level of impact for bin cleaning and Christmas tree collection as these services will be demand led. There are other companies providing bin cleaning and Christmas tree collections in the city. Residents can also dispose of their Christmas trees for free at one of the Christmas tree recycling points in the city.

Consultation, engagement and supporting EIAs

What consultations or engagement activities are being used to inform this assessment?

If consultation is planned or in process – state this and state when it will done/completed even if indicative. If no consultation completed or planned, state this, giving an explanation.

Consultation will be undertaken through the Council's budget setting consultation process which sets out the proposed savings and revenue raising choices that the council will need to make in order to set a balanced budget for 2026/27.

What other budget or service EIAs can assist/have been used to inform this assessment?

Income from trade waste and garden waste

Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this proposal?

Consider all possible intersections (Delete and State Yes, No, Not Applicable)

Age	No
Disability and inclusive adjustments, coverage under equality act and not	No
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	No
Religion, Belief, Spirituality, Faith, or Atheism	No
Gender Identity and Sex (including non-binary and Intersex people)	No
Gender Reassignment	No
Sexual Orientation	No
Marriage and Civil Partnership	No
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	No
Armed Forces Personnel, their families, and Veterans	No
Expatriates, Migrants, Asylum Seekers, and Refugees	No
Carers	No
Looked after children, Care Leavers, Care and fostering experienced people	No
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	No
Socio-economic Disadvantage	No
Homelessness and associated risk and vulnerability	No
Human Rights	No
Another relevant group (please specify here and add additional rows as needed)	No

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

- People being housebound due to disabilities or disabling circumstances
- Environmental barriers or mobility barriers impacting those with sight loss, D/deafness, sensory requirements, neurodivergence, various complex disabilities
- Ex-offenders and people with unrelated convictions
- Lone parents
- People experiencing homelessness

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

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

Through the digital improvements being made to existing charged for services, such as garden waste, opportunities for collecting this data can be explored.

What are the arrangements for monitoring, and reviewing the impact of this proposal?

Budgets will be monitored for uptake of the services. Equality data will be collected through customer feedback / Stage 1 complaints.

Impacts

Briefly state source of data or data analysis being used to describe the disproportionate negative impacts. Preferably provide link to data/ analysis if open data source.

Data and analysis sources may include (not an exhaustive list):

- **Consider a wide range (including but not limited to):**
- Population and population groups
- Census 2021 population groups Infogram: Brighton & Hove by Brighton and Hove City Council
- Census and local intelligence data
- Service specific data
- Community consultations
- Insights from customer feedback including complaints and survey results
- Lived experiences and qualitative data
- Joint Strategic Needs Assessment (JSNA) data
- Health Inequalities data
- Good practice research
- National data and reports relevant to the service
- Workforce, leaver, and recruitment data, surveys, insights
- Feedback from internal 'staff as residents' consultations

- Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
- Insights, gaps, and data analyses on 'who' the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.

Assess impact for different population groups	**Is there a possible disproportionate negative impact?** **State Yes or No**	**Describe the potential negative impact, considering for differences within groups For example, different ethnic groups, and peoples intersecting identities e.g. disabled women of faith** **OR** **If no impact is identified, briefly state why.**
Age including those under 16, young adults, multiple ethnicities, those with various intersections.	Yes	Older people on fixed incomes may find new charges for bin replacement financially challenging; some may struggle with online payment. Students/young adults in HMOs and private rentals may experience more frequent bin churn (lost/contaminated bins), amplifying exposure to charges.
Disability includes physical and sensory disabled, D/deaf, deafened, hard of hearing, blind, neurodiverse people, people with non-visible disabilities.	Yes	Disabled people are more likely to be unemployed or in low-waged work than non-disabled people, therefore may be disadvantaged by introduction of bin replacement charges. Disabled people may experience accessibility barriers in requesting/replacing containers.
Ethnicity, 'Race', ethnic heritage including Gypsy, Roma, Travellers	No	
Religion, Spirituality, Faith, Atheism, and philosophical belief	No	
Gender and Sex including non-binary and intersex people	No	
Gender Reassignment	No	
Sexual Orientation	No	
Marriage and Civil Partnership	No	

Pregnancy, Maternity, Paternity, Adoption, Menopause, (In)fertility (across intersections and non-binary gender spectrum)	No	Households with primary carers (disproportionately women) could experience additional burden organising replacements and payments.
Armed Forces Personnel, their families, and Veterans	No	
Expatriates, Migrants, Asylum Seekers, and Refugees considering for age, language, and various intersections	No	
Carers considering for age, language, and various intersections	No	
Looked after children, Care Leavers, Care and fostering experienced people considering for age, language, and various intersections	No	
Domestic and/or sexual abuse and violence survivors	No	
Socio-economic disadvantage considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections	Yes	People on low incomes may be disproportionately impacted by the proposals. They may not be able to afford to pay for the services.
Homeless and rough sleepers considering for age, veteran, ethnicity, language, and various intersections	No	
Human Rights	No	
Another relevant group (please specify here and add additional rows as needed)	No	

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

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

Cumulative impacts

Are there other budget proposals from other service areas that might worsen or mitigate the impacts from your proposal? Please give a brief description including name of other service(s).

Existing charges for garden and trade waste services.

Action planning

What SMART actions will be taken to mitigate the disproportionate impacts identified in section 3? If no mitigating action is possible, please state and explain why. Add additional rows as required.

SMART action 1: Undertake a full Equalities Impact Assessment as part of drafting new policy on bin replacement charges considering accessibility needs and possible exemption criteria.
SMART action 2: Continue to promote other means of disposing of Christmas trees, such as taking to a recycling point in the city.
SMART action 3: Analyse Stage 1 complaints and feedback to identify trends related to accessibility or affordability.

Outcome of your assessment

Based on the information above give the proposal an impact score between 1 – 5.

1= proposal has minimal impact and/or mitigating actions will significantly minimise the impact

3= proposal will have a significant negative impact; however, mitigation actions will reduce the impact considerably.

5= proposal has significant impact and mitigating actions will have limited effect on reducing impact.

Proposal's impact score: 1

Publication

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

Directorate and Service Approval

Signatory:	**Name and Job Title:**	**Date:** DD-MMM-YY
Responsible Lead Officer:	Louise Lawarence, Head of Strategy and Service Improvement	21/11/25
Accountable Manager:	Rachael Joy, Director of Environmental Services	24/11/25

Budget Proposal: EIA 11	
Title of budget saving being assessed:	Introduction of charging for high footfall public toilets
Name and title of officer responsible for this EIA:	Louise Lawrence Head of Strategy and Service Improvement
Directorate and Service Name:	City Operations, Environmental Services

Briefly describe the budget saving proposal:

Introduce a charge at public toilets with high footfall.

Summarise the most significant impacts identified by this assessment including which groups will be disproportionally negatively affected drawing out intersectional impacts as applicable:

The proposal will affect the community as a whole, as well as visitors to Brighton and Hove (all potential public toilet users). It may have a disproportionate impact on disabled people, children, older people, homeless people and general accessibility.

Consultation, engagement and supporting EIAs

What consultations or engagement activities are being used to inform this assessment?

If consultation is planned or in process – state this and state when it will done/completed even if indicative. If no consultation completed or planned, state this, giving an explanation.

Consultation will be undertaken through the Council's budget setting consultation process which sets out the proposed savings and revenue raising choices that the council will need to make in order to set a balanced budget for 2026/27.

What other budget or service EIAs can assist/have been used to inform this assessment?

Public toilets refurbishment programme

Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this proposal?

Consider all possible intersections (Delete and State Yes, No, Not Applicable)

Age	No
Disability and inclusive adjustments, coverage under equality act and not	No
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	No

Religion, Belief, Spirituality, Faith, or Atheism	No
Gender Identity and Sex (including non-binary and Intersex people)	No
Gender Reassignment	No
Sexual Orientation	No
Marriage and Civil Partnership	No
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	No
Armed Forces Personnel, their families, and Veterans	No
Expatriates, Migrants, Asylum Seekers, and Refugees	No
Carers	No
Looked after children, Care Leavers, Care and fostering experienced people	No
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	No
Socio-economic Disadvantage	No
Homelessness and associated risk and vulnerability	No
Human Rights	No
Another relevant group (please specify here and add additional rows as needed)	No

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

- People being housebound due to disabilities or disabling circumstances
- Environmental barriers or mobility barriers impacting those with sight loss, D/deafness, sensory requirements, neurodivergence, various complex disabilities
- Ex-offenders and people with unrelated convictions
- Lone parents
- People experiencing homelessness
- People facing literacy and numeracy barriers
- People on a low income and people living in the most deprived areas
- People who have experienced female genital mutilation (FGM)
- People who have experienced human trafficking or modern slavery

- People with experience of or living with addiction and/ or a substance use disorder (SUD)
- Sex workers

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

Public toilets are available to all residents and visitors to the city. It is not possible to monitor the characteristics of people using the sites, however installation of paddle gates will enable footfall numbers to be monitored accurately.

What are the arrangements for monitoring, and reviewing the impact of this proposal?

Customer complaints will continue to be monitored and reviewed. Feedback from organisations advocating or supporting people with protected characteristics will be reviewed to ensure any disproportionate impacts of charging are identified.

Impacts

Briefly state source of data or data analysis being used to describe the disproportionate negative impacts. Preferably provide link to data/ analysis if open data source.

Data and analysis sources may include (not an exhaustive list):

- **Consider a wide range (including but not limited to):**
- Population and population groups
- Census 2021 population groups Infogram: Brighton & Hove by Brighton and Hove City Council
- Census and local intelligence data
- Service specific data
- Community consultations
- Insights from customer feedback including complaints and survey results
- Lived experiences and qualitative data
- Joint Strategic Needs Assessment (JSNA) data
- Health Inequalities data
- Good practice research
- National data and reports relevant to the service
- Workforce, leaver, and recruitment data, surveys, insights
- Feedback from internal ‘staff as residents’ consultations
- Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
- Insights, gaps, and data analyses on ‘who’ the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.

Assess impact for different population groups	**Is there a possible disproportionate negative impact?** **State Yes or No**	**Describe the potential negative impact, considering for differences within groups For example, different ethnic groups, and peoples intersecting identities e.g. disabled women of faith** **OR** **If no impact is identified, briefly state why.**
Age including those under 16, young adults, multiple ethnicities, those with various intersections.	Yes	Children, young families and older people are more likely to need to use the toilet more frequently and this will have a disproportionate financial impact on them. They may be less likely to find alternative suitable facilities nearby. Controlling access to the toilets physically may impact disproportionately on parents/carers with buggies trying to access the facilities.
Disability includes physical and sensory disabled, D/deaf, deafened, hard of hearing, blind, neurodiverse people, people with non-visible disabilities.	Yes	Disabled people with limited mobility will potentially be unable to access other toilets further away. They may need to use the toilet more often and this will have a disproportionate financial impact on them. They may be less likely to find alternative accessible facilities nearby.
Ethnicity, 'Race', ethnic heritage including Gypsy, Roma, Travellers	No	
Religion, Spirituality, Faith, Atheism, and philosophical belief	No	
Gender and Sex including non-binary and intersex people	Yes	Women and girls may need toilets more often due to menstruation or menopause. Charging could exacerbate gender-based inequalities in access.
Gender Reassignment	No	
Sexual Orientation	No	
Marriage and Civil Partnership	No	
Pregnancy, Maternity, Paternity, Adoption, Menopause, (In)fertility (across intersections and non-binary gender spectrum)	Yes	Pregnant people are more likely need to use the toilet more often and this will have a disproportionate financial impact on them. Menopausal people may need access to toilet facilities more frequently that other members of the public due to common perimenopausal

		symptoms such as irregular periods, recurrent UTIs, hot flushes.
Armed Forces Personnel, their families, and Veterans	No	
Expatriates, Migrants, Asylum Seekers, and Refugees considering for age, language, and various intersections	No	
Carers considering for age, language, and various intersections	No	
Looked after children, Care Leavers, Care and fostering experienced people considering for age, language, and various intersections	No	Lone parents and people caring for individuals with health conditions requiring frequent toilet use, may be disproportionately affected.
Domestic and/or sexual abuse and violence survivors	No	
Socio-economic disadvantage considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections	Yes	Charging at public toilets sites will have a disproportionate impact on people who have lower incomes.
Homeless and rough sleepers considering for age, veteran, ethnicity, language, and various intersections	Yes	Homeless people and rough sleepers are less likely to have access to a consistent source of income, thereby unable to pay for access to public toilets. They may feel a greater stigma when using other facilities and may not feel welcome.
Human Rights	No	
Another relevant group (please specify here and add additional rows as needed)	Yes	Lone parents, carers, and individuals with health conditions requiring frequent toilet use may be disproportionately affected. Intersectional impacts are also noted for people with substance use disorders, survivors of abuse, and sex workers.

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

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

Cumulative impacts

Are there other budget proposals from other service areas that might worsen or mitigate the impacts from your proposal? Please give a brief description including name of other service(s).

Potentially other budget proposals that affect disabled people, older people, people with childcare responsibilities, people on low incomes.

Action planning

What SMART actions will be taken to mitigate the disproportionate impacts identified in section 3? If no mitigating action is possible, please state and explain why. Add additional rows as required.

SMART action 1: Continue to monitor complaints to see if people with protected characteristics are disproportionately affected by the changes
SMART action 2: Ensure communications about the charges at public toilet sites are inclusive
SMART action 3: Publicise other toilets available, such as libraries, museums, shopping centres etc. Encourage businesses to sign up to a Community Toilet Scheme / Use Our Loo Scheme, to allow the public to use their toilets
SMART action 4: Ensure paddle gates installed do not limit how accessible the public toilets are.
SMART action 5: Ensure paddle gates' specification allows for parents/carers with buggies to access the toilets.

Outcome of your assessment

Based on the information above give the proposal an impact score between 1 – 5.

1= proposal has minimal impact and/or mitigating actions will significantly minimise the impact

3= proposal will have a significant negative impact; however, mitigation actions will reduce the impact considerably.

5= proposal has significant impact and mitigating actions will have limited effect on reducing impact.

Proposal's impact score:	4

Publication

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

n/a

Directorate and Service Approval

Signatory:	**Name and Job Title:**	**Date:** DD-MMM-YY
Responsible Lead Officer:	Louise Lawrence, Head of Strategy and Service Improvement	21/11/25
Accountable Manager:	Rachael Joy, Director of Environmental Services	24/11/25

Equality Act 2010: section 149 Public Sector Equality Duty

(1) A public authority must, in the exercise of its functions, have due regard to the need to —

(a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;

(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

(c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

(2) A person who is not a public authority but who exercises public functions must, in the exercise of those functions, have due regard to the matters mentioned in subsection (1).

(3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to —

(a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;

(b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;

(c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

(4)The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.

(5) Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—

(a) tackle prejudice, and

(b) promote understanding.

(6) Compliance with the duties in this section may involve treating some persons more favourably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.

(7) The relevant protected characteristics are—

- age;
- disability;
- gender reassignment;
- pregnancy and maternity;

- race;
- religion or belief;
- sex;
- sexual orientation.

(8) A reference to conduct that is prohibited by or under this Act includes a reference to—

(a) a breach of an equality clause or rule;

(b) a breach of a non-discrimination rule.

(9) Schedule 18 (exceptions) has effect.

Adequacy of Reserves and Working Balance

The working balance is recommended to be maintained at a minimum of £9 million over the period of the Medium Term Financial Strategy. The consequences of not keeping a minimum prudent level of balances can be serious and in the event of a major problem or a series of events, the council would run a serious risk of a deficit or of being forced to cut spending during the year in a potentially damaging and arbitrary way.

The current level of balances has been based on the robustness of estimates information and the Corporate Risk Register. In addition, the other strategic, operational and financial risks taken into account when considering the minimum level of the working balance include:

(i) The complexity and degree of uncertainty associated with planned economy and efficiency measures and/or service changes and the likelihood of achieving them in full;

(ii) The level of balances required to complement resources potentially available under the Bellwin Scheme for Emergency Financial Assistance to Local Authorities in the event of a major emergency;

(iii) Risks of rising demand, increasing costs and/or falling income due to economic conditions or potential legislative changes;

(iv) The risk of major legal challenges, both current and in the future;

(v) Risks in the financial inter-relationship between NHS partners and the council;

(vi) The need to retain a general contingency to provide against unforeseen circumstances that may arise, for example, delays in council tax billing which could arise from a major systems or power outage;

(vii) The need to retain reserves for general day-to-day cash flow needs.

In addition, the cash flow risk for unitary authorities is significant given the full range of services provided. Taking all of these factors into account, a minimum of £9 million working balance is considered appropriate, representing about 3 weeks of council tax revenue.

Schools' Balances

Schools' balances, while consolidated into the council' s overall accounts, are a matter for Governing Bodies. Nevertheless, under the council's Scheme for Financing Schools the council has a duty to scrutinise whether any school holds surplus balances. The council's Scheme for Financing Schools is in line with the requirements of the Secretary of State for Education and the arrangements in place are considered adequate.

Estimated Earmarked General Fund Revenue Reserves

Processes are in place to regularly review the council's earmarked revenue reserves. Details of the review of reserves are included in the table below.

The Chief Finance Officer is required, under Section 25 of the LG Act 2003, to review the adequacy of reserves and provisions. The review of reserves assesses the purpose and appropriateness of holding a reserve or provision and assesses the level of the reserve against identified risks and commitments. Following the review, £1.041m can be released from the following reserves in 2026/27.

Reserve or Provision	Amount to be Released £'000
Section 106 Interest Reserve	6
Legacy LEP funds Revenue Reserve	4
Winter Maintenance Reserve	540
East Brighton Parking Surplus Reserve	70
Preston Park Parking Surplus Reserve	275
Cemeteries Maintenance Reserve	65
Insurance Provision	81
Total Reserves & Provisions to be released	**1,041**

Appendix 5 – Review of Reserves & Provisions

	Estimated Balance as at 01/04/26 £'000	Planned Use 2026/27 £'000	Estimated Balance as at 31/03/27 £'000	Review Arrangements	Conclusion
General Fund Reserves					
General Fund Working Balance/General Reserves	8,965	1,126	10,091	Reviewed against the register of financial risks, taking into account the requirements of the Local Government Act 2003.	A minimum working balance of £9.000m is recommended by the Chief Finance Officer in accordance with the requirements of Section 25 of the Local Government Act 2003. The Working Balance is being replenished over three years with the final repayment due in 2026/27.
General Fund Working Balance/General Reserves - held for specific future commitments	175	-175	0	Following closure of accounts.	Balance will be used to fund ongoing corporate commitments.
General Risk Reserve	0	1,041	1,041	Following closure of accounts.	Creation of a general risk reserve to pool general fund budgetary risks
Library PFI Reserve	520	-156	364	Following closure of accounts.	Use for funding the project over the lifetime of the PFI scheme. Expected to be increased contributions from reserves, due to inflationary pressures. Contributions to the reserve may be required in future years.
Waste PFI Project Reserve	6,688	-343	6,345	Following closure of accounts.	Use for funding the project over the lifetime of the PFI and to bridge the gap for when PFI credits stop. This reserve has been used to fund the Term Time only costs and will be replenished in time to meet existing Waste PFI commitments.

Appendix 5 – Review of Reserves & Provisions

	Estimated Balance as at 01/04/26 £'000	Planned Use 2026/27 £'000	Estimated Balance as at 31/03/27 £'000	Review Arrangements	Conclusion
Section 106 Receipts (Revenue)	501	0	501	Reviewed throughout the year to reflect agreed liabilities and new agreements.	Retain for specified purpose.
Section 106 Interest	6	-6	0	Reviewed throughout the year to reflect agreed liabilities and new agreements.	Transfer residual unrequired balance to General Risk Reserve.
Developer Contributions Unapplied (S106 Capital)	747	0	747	Reviewed throughout the year to reflect agreed liabilities and new agreements.	Retain for specified purpose.
ICT Investment Reserve	402	-125	277	Following closure of accounts.	Held to support planned IT&D expenditure over the next two years.
Legacy LEP funds Revenue reserve	4	-4	0	Following closure of accounts.	Transfer residual unrequired balance to General Risk Reserve.
Winter Maintenance	540	-540	0	Following closure of accounts.	Pool with other risks under a general risk reserve
Dome Planned Maintenance	103	-53	50	Following closure of accounts.	Retain - subject to lease agreement with Brighton Dome & Festival Society.
Hove Park 3G Pitch Renewal	0	15	15	Following closure of accounts.	Held to replace pitch at the end of its useful life. Pitch replaced in 2025/26 and reserve to fund the capital spend. Future sinking fund payments will be received to replace the newly replaced pitch at the end of its useful life.

	Estimated Balance as at 01/04/26 £'000	Planned Use 2026/27 £'000	Estimated Balance as at 31/03/27 £'000	Review Arrangements	Conclusion
Surface Water Management Reserve	421	39	460	Following closure of accounts.	Retain to support planned SWMP related works, emergency work and to contribute to any carbon neutral opportunities. This reserve is retained to meet our statutory obligations as the Lead Local Flood Authority.
Sports Facilities Reserve	453	0	453	Following closure of accounts.	Retain to support Sports Facilities.
Licensing - other reserve	26	0	26	Following closure of accounts.	Retain for specified purpose - to fund potential future deficits or repayment to licensees. Reserve smooths out fluctuations in volumes of licences issued each year.
Taxi Licensing	82	0	82	Following closure of accounts.	Retain for specified purpose - to fund potential future deficits or repayment to licensees. This smooths out fluctuations in volumes of licences issued each year.
East Brighton Parking Surplus	70	-70	0	Following closure of accounts.	Release of reserves following agreement to un-ringfence surpluses Transport & Sustainability committee (6 Feb 2024)
Preston Park Parking Surplus	275	-275	0	Following closure of accounts.	Release of reserves following agreement to un-ringfence surpluses Transport & Sustainability committee (6 Feb 2024)
Overdown Rise Footpath Maintenance	20	0	20	Following closure of accounts.	Commuted sum held for future years maintenance costs of the foot path at Overdown Rise

	Estimated Balance as at 01/04/26 £'000	Planned Use 2026/27 £'000	Estimated Balance as at 31/03/27 £'000	Review Arrangements	Conclusion
HMO Licensing Fees Reserve	531	41	572	Following closure of accounts.	Retain to support annual inspections of HMO licenses - this is a statutory function (Mandatory HMO Licensing Fees income needs to be used only for the running of the Mandatory HMO Licenses.)
Damage Deposit Guarantee Scheme	94	0	94	Reviewed during the year as part of budget monitoring process	Retained for specific purpose but required level will continue to be reviewed.
RP&M Trust Sinking Fund	50	0	50	Following closure of accounts.	Retain - subject to lease agreement with RPMT
HMO Additional Licensing Fees	833	-192	641	Following closure of accounts.	Additional HMO Licensing Fees income needs to be used only for the running of the Additional HMO Licenses. Each license is for 5 years. The fee income is therefore used for that 5-year period.
Selective Licensing Fees	1,736	-390	1,346	Following closure of accounts.	Selective Licensing Fees income needs to be used only for the running of the Selective Licenses. Each license is for 5 years. The fee income is therefore used for that 5-year period.
Cemeteries Maintenance Reserve	65	-65	0	Following closure of accounts.	Pool with other risks under a general risk reserve
Travellers Site Capital Reserve	79	0	79	Following closure of accounts.	Held to fund future major works costs of the Travellers site.
Restructure Redundancy Reserve	130	124	254	As part of closure of accounts.	Restructure & Redundancy costs are funded within the capital programme as part of the

	Estimated Balance as at 01/04/26 £'000	Planned Use 2026/27 £'000	Estimated Balance as at 31/03/27 £'000	Review Arrangements	Conclusion
					capitalisation direction.
Community Infrastructure Levy (CIL) - Neighbourhood reserve	384	0	384	Following closure of accounts.	Allocations from the Neighbourhood Reserve will be made in accordance with the agreed process which involves ward councillors.
CIL - Strategic reserve	1,217	0	1,217	Following closure of accounts.	Allocations from the Strategic reserve will be made in line with the strategic objectives set out in the initial scheme and will be approved by Cabinet.
Total General Fund Reserves	**25,117**	**-8**	**25,109**		
Schools / DSG Reserves					
Schools LMS Balances	-5,600	0	-5,600	Following closure of accounts.	Balances are held by school governing bodies. Position unclear for future years.
Total Schools / DSG Reserves	**-5,600**	**0**	**-5,600**		
TOTAL RESERVES	**19,517**	**-8**	**19,509**		
General Fund Provisions					
10 Year lease revenue costs Provision	105	0	105	Review of annual contribution to this provision at closedown.	This is required to pay back the borrowing costs when 10 year leases finish in 2032/33.These are 30 properties leased through Rough Sleeping Accommodation Programme partly funded by MHCLG.
Voluntary Severance Provision	1,250	-750	500	Following closure of accounts.	To fund cost of potential severance agreements from 2026/27 savings proposals.

	Estimated Balance as at 01/04/26 £'000	Planned Use 2026/27 £'000	Estimated Balance as at 31/03/27 £'000	Review Arrangements	Conclusion
Insurance Provision	4,021	-81	3,940	The Insurance Fund is subject to a bi-annual health check by the actuaries. The last health check was completed in March 2025.	The level of the Insurance Fund will be adjusted in line with the recommendations of the actuary report which enables £81k to be released to the General Risk Reserve. The next health check is due in due in March 2027.
Total General Fund Provisions	**5,376**	**-831**	**4,545**		
TOTAL ALL FUNDS	**24,893**	**-839**	**24,054**		

Brighton & Hove City Council

Cabinet

Agenda Item 85

Subject: **Sustainability plan for libraries**

Date of meeting: **11 December 2025**

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

Lead Officer: **Corporate Director for Families, Children and Wellbeing**

Contact Officer: **Name: Ceris Howard**

Email: ceris.howard@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 and policy context

1.1 Local Authorities have a statutory duty under the Public Libraries and Museums Act 1964 (Section 7) to provide a comprehensive and efficient library service for all persons who live, work or study in the area. When considering how best to meet this duty, the council may recognise existing constraints, taking into account the resources available to them. The city's Libraries Strategy 2022-25 sets out the vision for libraries to be a vibrant and accessible community asset. The Brighton & Hove City Council Plan 2023 to 2027 also provides a commitment to increase use of our libraries and improve facilities and library users' experience.

1.2 The decision was made at the council's budget meeting in February 2025 to make savings to the library service revenue budget, likely to be achieved through a reduction in public service sites and opening hours. In accordance with guidelines from the Department, for Culture, Media and Sport (DCMS), a 12 week consultation was agreed by Cabinet in July and completed in October. The findings of the consultation contribute to the final recommendations below.

1.3 The report makes recommendations based on the following evidence: the public consultation responses in appendix 1, the analysis of the needs and use of the city's residents and libraries in appendix 1 and 2, the assessment of the equalities impact of the proposals in appendix 4, and officer knowledge and understanding of the current and future needs and priorities of the service. The proposals also reflect the objectives set out in the council plan. The final decisions in relation to the proposals will be made by Cabinet and must reflect the requirement that the council meet the statutory

obligations of the Act to provide a comprehensive and efficient library service.

2. Recommendations

2.1 That having considered the information provided in this report and its appendices, Cabinet agrees to make the following changes to existing library provision, being satisfied that its remaining provision complies with its statutory obligation to provide a comprehensive and efficient library service

2.1.1 Cabinet agrees to reduce opening hours at Jubilee Library by 5 hours/week on Monday evenings and Sunday afternoons from 1st April 2026 ;

2.1.2 Cabinet agrees to reduce opening hours at Hove Library by 5 hours/week on Wednesday evenings and Saturday afternoons from 1st April 2026;

2.1.3 Cabinet agrees to close Hollingbury Library on 31st March 2026 and notes that officers will work with partners in exploring alternative options for future community based provision;

2.1.4 Cabinet agrees to continue the existing library provision in Rottingdean with a further report to be brought back to Cabinet in 12 months to review the outcome of work with community partners;

2.1.5 Cabinet agrees to close Westdene Library on 31st March 2026 and notes that officers will work with partners in exploring alternative options for future community based provision;

2.2 That Cabinet delegates authority to the Corporate Director for Families, Children and Wellbeing, working in consultation with the Cabinet Member for Sport & Leisure, to take all steps necessary or incidental to the delivery of the recommendations in paras 2.1.1 to 2.1.5 inclusive.

3. Context and background information

Statutory requirements & Libraries Strategy

3.1 Local Authorities have a statutory duty under the Public Libraries and Museums Act, as stated in paragraph 1.1 of this report. The Brighton & Hove City Council Plan 2023 to 2027 provides a commitment to increase use of our libraries and improve facilities and library users' experience.

3.2 DCMS is responsible for the superintendence and promoting the improvement of libraries. It sets out that if a Local Authority wishes to make changes to the library provision, it should be able to demonstrate:

- plans to consult with local communities alongside an assessment of their needs (including any projections of need)

- consideration of a range of options (including alternative financing, governance or delivery models) to sustain library service provision in their area
- a rigorous analysis and assessment of the potential impact of their proposals

3.3 The city's statutory public library service currently provides access to 13 libraries, Jubilee and Hove Libraries in the city centre and 11 community libraries. The community libraries are single staffed from one to four days per week, and most are open to the public 7 days/week when unstaffed with Libraries Extra (LE). This enables customers to access the library when unstaffed, using their library card and PIN to access the building, monitored by CCTV.

3.4 Online resources and the Home Delivery and Equal Access Service are available for those who choose or need to access them. Online resources include access to the e-library, with free loans of e-books, e-audio and e-newspapers. The library service provides access to a wide range of subscription sites including family history, language courses and newspaper archives. The Home Delivery Service works with volunteers to deliver books and audio books to those who are unable to visit libraries due to disability or caring responsibilities. The Equal Access Service delivers resources to residential homes around the city. Libraries Connect offers volunteer-led sessions for those who need support to access digital services and IT within libraries.

3.5 If the proposed changes set out in section 2 of this report are implemented, Brighton & Hove will retain 11 community libraries. Together with the resources in 3.4 above, the city-wide offer is considered to provide an appropriately comprehensive library service while delivering efficiency savings to support the mid-term sustainability of services.

3.6 The city's Libraries Strategy 2022-25 sets out the vision for libraries to be a vibrant and accessible community asset. The current strategy expires at the end of 2025, and a new strategy will be launched in 2026, developing the longer-term plan for libraries including post Jubilee Library PFI contract arrangements in 2029.

3.7 The rising cost of delivering services will present considerable financial pressures for the service in the medium term and more changes to service delivery are likely to be necessary to meet these challenges. The new strategy will need to consider these pressures and the end of the PFI contract with its associated grant, exploring how alternative models of delivery, for example community-led services, might be developed to meet the needs of residents within limited resources.

3.8 The new strategy will set the vision for city libraries as sustainable and embedded community resources, supporting community resilience, focusing remaining resources on targeting services to those who could most benefit. It will build on the Needs & Use Analyses developed during this change

programme to continue to ensure that the Council meets its statutory obligations and serves the needs of residents.

Savings requirements

3.9 Despite recent real terms increases in funding from central Government, Brighton & Hove City Council, like many other local authorities, is under financial pressure, with budget deficits forecast for the next four years. All services are asked to achieve savings targets in order to meet this financial pressure.

3.10 The Library Service is also experiencing financial pressures from the rising costs of providing services. The running costs of public services, including but not limited to cleaning, security and deliveries, are all rising, without additional libraries revenue budget allocated to meet this rise**.**

3.11 In this context, the city council has proposed changes in public library provision in the city to not only improve sustainability but also to deliver on the savings plan for 2025-27. Concentrating resources on fewer physical library locations and a reduction in opening hours, whilst maintaining a geographic spread across the city, will support longer-term sustainability of the wider city service, as well as safeguarding the quality of library provision.

3.12 In February 2025 as part of the council budget decisions councillors agreed to reduce the Library Service revenue budget by £250,000, most of which to be achieved through a reduction in public services, to include library closures and a decrease in opening hours.

Processes followed

3.13 To review library services and ensure they could be delivered in a comprehensive and efficient way, delivering the agreed savings, a thorough process was required. Here is a summary of the timeline for the change process developed and followed.

February	Full Council agreed budget reduction for Library Services
March	People Overview & Scrutiny Committee
July	Cabinet agreed to commence public consultation
July – Oct	12 week public consultation
November	People Overview & Scrutiny Committee
December	Cabinet Meeting for final decision

Process followed February – June 2025 - development of proposals

3.14 In the spring and early summer of 2025, council officers worked closely with the Administration to develop proposals for changes to the public library offer to meet the savings whilst maintaining a comprehensive and efficient service.

3.15 The Library Service presented a report to the March 2025 People Overview & Scrutiny Committee. Revenue budget reductions had been identified and

agreed at the February 2025 Budget Council. Details of the process for decision making and changes to public library provision were discussed, with questions about the timeline, Needs & Use Analysis and public consultation. The potential impact on older people and ideas for supporting them within the consultation were considered. The committee resolved to note the report. The need for further scrutiny of the proposals later in the process was identified. The second People Overview and Scrutiny Committee report was presented in November 2025.

3.16 In July, officers conducted the first part of a Needs & Use Analysis, looking at the usage statistics of each library, the levels of deprivation and needs in each area, the cost of delivering services, and the geographic spread of sites across the city.

3.17 Part one of the needs and use phase consisted predominantly of desk-based research and data analysis. Data reviewed included footfall, borrowing data (about what resources are borrowed, when and where) from library management systems, 2021 Census data, Office for National Statistics and Department for Work & Pensions data available via the Local Insight platform, and additional information provided by colleagues from across BHCC including numeric Schools Census, travel and Adult Social Care data.

3.18 The original proposals were identified through analysis of four key factors – need, use, geography and cost.

3.19 **Need:** Consideration of the needs of those who live, work, study and visit in the area. Key demographic information was collated to create a picture of existing and potential needs from library and information services. The analysis considered variation in needs relating to social outcomes from area to area.

3.20 It is recognised that communities are not consistent or homogenous and within community areas there will be differences in need. However, the needs of residents and accessibility of services were the key factor driving decisions for proposals for change.

3.21 In the original proposal, emphasis was placed on protecting services in areas of greatest need. It is recognised that libraries support literacy for children through access to free materials and events. They provide access to digital resources and support for digital inclusion for residents of all ages. They support people to live healthier lives in a range of ways, including providing access to health information, hosting healthcare events and delivering books to those who are housebound, addressing social isolation and loneliness.

3.22 **Use:** Consideration of current, previous and projected use of existing library provision. Usage data was collated and analysed to find trends in use and compare usage across sites. This included but was not limited to:

- Footfall by library by hour
- Active borrowers

- Number of items borrowed
- Number of computer sessions

3.23 While use does not necessarily correlate with need, it was recognised that changes at the most used sites would impact on a greater number of people. This was considered when considering proposals for change.

3.24 Usage statistics only show part of the picture for libraries, particularly the largest and busiest, where footfall figures are a blunt measure of use and book borrowing is only part of the library's offer. It was recognised additional data was needed to understand better how customers used the spaces and services, what they valued and length and frequency of visits. This data needed to be gathered through the consultation process.

3.25 **Geography:** Consideration of variation in geographical spread of libraries. The spread and grouping of libraries across the city was considered. Public transport links, parking facilities and measures of car ownership were included, as well as a measure of miles between libraries. Transport links to central libraries from communities were considered, as well and those between smaller, local libraries, as data showed that customers at Jubilee Library were travelling in from other locations.

3.26 This included analysis of the postcodes of active borrowers and how many of them used multiple libraries. Further information was gathered on this through the consultation.

3.27 The availability of alternative library sites nearby was considered as part of the rationale for proposals for change.

3.28 **Cost:** Consideration of the cost of delivering services and savings required. The cost of delivering services was measured and included but was not limited to:

- Staff salaries – Library & Information Officers and Libraries Managers
- Weekend pay enhancements for Jubilee & Hove
- Cleaning
- Security

3.29 Some costs were not included; the book fund was not considered for reduction as the intention would be to reallocate stock to other libraries to support changes in use.

3.30 In summary, the balance of different factors was considered when agreeing proposals for change. It is understood that reducing hours at the central libraries necessarily affects the greatest number of people. However, the number of staff needed for those sites is far higher, so any reduction in hours would achieve a greater saving. Community libraries have much lower running costs than central libraries, but closure of these sites impacts on less individuals. The proposals for change were developed with consideration of balancing these elements of impact.

<u>Identifying initial proposals from the analysis of need, use, geography and cost</u>

3.31 It is recognised that the community profiles for each library, reviewing use, need, geographic spread and cost, are only a summary of data reviewed and cannot reflect the nuances of individuals using those libraries. The public and stakeholder consultation phase enabled the service to hear from a wide range of customers and residents and add some of those more nuanced experiences to the data for consideration.

3.32 To meet the need for savings, it was agreed to concentrate resources on fewer physical library locations, supporting the longer-term sustainability of the wider city service and safeguarding the quality of library provision.

3.33 Various options for reductions in services were considered by senior officers and councillors and the proposals were agreed at July 2025 Cabinet to go out to consultation. Members were asked to consider the process followed up to the decision to consult on the proposals outlined in that report, as well as the methodology and rationale for selecting those proposals.

3.34 The analysis of need, use, geography and cost identified which libraries were of highest priority for the city to maintain and promote, based on the needs of the areas they serve, giving appropriate weight and consideration to each of the elements considered. Certain libraries were identified as priorities to support those areas at most risk of disadvantage. The consideration of these factors led to the following proposals.

<u>Proposals put to Cabinet in July 2025</u>

3.35 It was proposed and agreed by Cabinet in July 2025 to agree to commence a public consultation on the proposals, specifically covering the following suggestions:

- Consult on a proposed closure of Hollingbury Library
- Consult on a proposed closure of Rottingdean Library
- Consult on a proposed closure of Westdene Library
- Consult on proposed changes in opening hours at Hove Library
- Consult on proposed changes in opening hours at Jubilee Library

3.36 These proposals were based on an analysis of the Needs & Use data and the need to make savings, as agreed at Budget Council in February 2025.

3.37 An Equalities Impact Assessment was prepared with regard to the consultation process.

<u>Public consultation July – October 2025</u>

3.38 In line with guidance from DCMS, as at paragraph 3.2, a public consultation period was completed and has influenced the development of final proposals. Council governance protocols have been followed throughout.

3.39 DCMS requires a public consultation period to engage with residents, users and non-users, for any proposals to change statutory library services. The

opening hour changes and libraries closure proposals were put to a public consultation which ran for 12 weeks from 18 July to 10 October 2025.

3.40 This consultation process included a survey, public meetings and drop-in sessions, email correspondence, and meetings with local community groups and stakeholders.

3.41 The consultation was well responded to by a wide range of library users, visitors to the city, and other stakeholders. Nearly 2,000 people engaged with the survey, and hundreds of people attended online and face-to-face public meetings. Views were shared on the value of libraries within the city and how they meet a wide range of community needs.

3.42 Officers and Councillors met with key community stakeholders, including Rottingdean Parish Council and Rottingdean Heritage, Westdene School and Old Boat Community Centre. At these meetings more detail was heard about the potential impact of proposed changes and alternative options for savings and service delivery were discussed in detail. These stakeholders and the local Save Our Library groups shared documents including letters directly to the Administration and petitions, stating their objections to the proposals.

3.43 All of the responses received during the consultation period are included in the Summary of Consultation Responses Report, appendix 1. The full responses from the consultation have been made available to Cabinet Members to support decision making. The information gathered through the consultation was used to develop the second part of the Needs & Use Analysis and to test the rationale for the proposals.

3.44 The data gathered through the survey further informed the development of the full Equality Impact Assessment and potential mitigations, appendix 4.

3.45 Further details on the public consultation can be found in section 5 below.

Alternative options

3.46 During the public consultation, residents were asked to contribute ideas for alternative ways to meet the savings and/or deliver library services. Suggestions ranged from minor changes to operational delivery through to fundamental redesigning of whole service delivery.

3.47 Those suggestions were reviewed by officers and developed as outlined in section 4 below. It is the recommendation of officers that, if the recommendations proposed in this report are formally approved by Cabinet today, then some of the alternative provision ideas raised through the consultation are explored further. These alternatives would not fully replace the council run services but could offset some of the impacts of reductions for residents in the affected areas.

3.48 During October to December 2025, council officers have continued to analyse the data from the Needs and Use Analysis and the public

consultation, to further review and refine the proposals for changes to the Library Service recommended in this report.

3.49 The second part of the Needs & Use Analysis was prepared, informed by the public consultation.

3.50 The People Overview & Scrutiny Committee met on Monday 10 November 2025 to review the consultation processes and responses from the public consultation into proposed changes to Library Services. Deputations from residents and responses from the committee were heard. The Committee made the following recommendations:

- recommends that Cabinet do not proceed with the libraries closure plan at this time. (referring to all proposals for closure of services – opening hours reductions as well as whole site closures).
- recommends that if Cabinet chooses to proceed with library closures, the library buildings are mothballed until the refreshed Libraries Strategy determines the future use of city libraries.

Overview of final recommendations and supporting rationale

3.51 During the consultation process further reflection took place, considering the key factors and what the final proposals should look like. This is detailed below for each of the libraries affected by proposals. To support the consideration of these final proposals, an Equality Impact Assessment has been developed, identifying the impacts of the proposals and potential mitigations, see appendix 4.

Jubilee Library

3.52 **Original rationale** Jubilee Library is by far the biggest and busiest library in the city, with over 850,000 visits and around 180,000 items borrowed per year. A reduction in opening hours would impact a large number of residents and customers. However, with the proposed reductions, the opening hours for Jubilee Library remain good and provide a range of options, including evenings and weekends, retaining a 7 day/week service.

3.53 In the original Part One Needs & Use Analysis (appendix 2) the footfall at different times of the day and days of the week was considered and contributed to the rationale for proposals. Hourly footfall at Jubilee peaks on weekday mornings, remains steady throughout the day but drops off gradually between 5pm and 7pm. 1% of Jubilee's weekly visits happen during these hours. Sunday mornings 11am-12pm at Jubilee are almost three times as busy on average as 4-5pm. Sunday 2-5pm accounts for 4% of the week's visitors here. At Jubilee, a reduction of two hours on a Monday evening (5-7pm) and three hours on a Sunday afternoon (2-5pm) would have the least impact in terms of footfall as these are the quietest times.

3.54 Savings can be achieved through a reduction in staffed hours, particularly at weekends. Most customers at Jubilee do not live close to the library but visit when travelling into the centre, often for work, leisure or studying. 80% of

survey respondents said they use other libraries as well as Jubilee. Those customers would retain access to other libraries at some of the times proposed for reduction at Jubilee. Although the Needs & Use Analysis showed changes would impact customers, with a range of needs, on balance, the savings achievable make this a viable proposal.

3.55 **Additional considerations** Through the consultation and in the public meetings, customers expressed how much the library was valued as a free, safe public space and community hub for all ages, including children, students, disabled people, and those facing social isolation or financial hardship.

3.56 There was particular emphasis on the importance of Sunday afternoons for families, and the importance of weekday evenings for students and across these hours for those seeking a warm, safe and free space, particularly older people and those who are disabled. Across the range of protected characteristics including those from Black and other racially minoritised backgrounds, and LGBTQ residents, was a concern that any reduction in the service would impact on the importance of the library for health and well-being, social contact, and community connection. There is also a concern that a reduced service can lead to increased digital exclusion, but it is considered that the relatively small reduction in overall hours would not be likely to have a proportionately significant impact on this issue. The specific impact on each protected characteristic group and ways to mitigate that impact is examined in the EIA appendix 4. The recommendation would maintain a comprehensive service, which can meet the needs of residents, including those who use the library to study outside of traditional school and college hours and those who work full time and wish to use services at evenings and weekends.

3.57 It was recognised that a reduction in opening hours at Jubilee could impact the service's ability to offer Libraries Extra as an option in community libraries, as this currently relies on library staff phone support from Jubilee. Alternative options or delivery of this service element are being explored and it will be retained as part of the key mitigations for reductions in hours at the central libraries; some customers who previously accessed Jubilee on a Monday evening or Sunday afternoon could still access library buildings through Libraries Extra at community libraries.

3.58 There were some suggestions for alternative ways to reduce costs, including introducing Libraries Extra at Jubilee, see paragraph 4.26.

3.59 However, there were no suggestions which would offset the savings which could be made from a reduction in hours at Jubilee Library and the rationale stands for this original proposal to be progressed.

<u>Hove Library</u>

3.60 **Original rationale** Hove is the second largest and busiest library in the city with around 159,000 visitors and over 90,000 items borrowed per year. A

reduction in opening hours at this library would impact a proportionally large number of residents and customers.

3.61 In the original Needs & Use Analysis, footfall across hours and days of the week were considered in the rationale for proposed changes. Hourly footfall at Hove peaks on weekday mornings, remains steady throughout the day but drops off gradually, with 5pm to 7pm accounting for 2% of the branch's weekly visits. Wednesdays 6-7pm currently sees an average of 29 people visiting and a reduction of two hours here (5-7pm) would have the least impact in the week. Saturdays 10-11am are twice as busy on average as 4-5pm. 2-5pm accounts for 6% of Hove's weekly visits, and a reduction in these hours would have less impact on the library's footfall than at other times.

3.62 The retention of services 6 days/week and access to Jubilee Library on Sundays and some evenings provides a range of options for customers coming into the centre of the city. Access to community libraries during evenings and weekends through Libraries Extra mitigates some of the impact of the changes proposed on those not able to use the libraries during standard weekday opening hours.

3.63 While the two central libraries have clear evidence of meeting the needs of a diverse range of customers and have high numbers of visitors, savings made in these locations are higher than those achievable through community library closures.

3.64 **Additional considerations** Respondents to the consultation said they use multiple libraries and only 6% exclusively use Hove. Many said that closing at 5pm or earlier would make the library inaccessible to anyone working standard hours, and that Saturday afternoons are prime time for families. Similarly to Jubilee, most customers would be able to use alternative libraries if the hours were to be reduced at Hove. It was clear from the consultation that older people and disabled people in particular value the accessibility of the library, and that it is a warm safe place for them to use. There is real concern among them about increased isolation as a result of these changes. Across all groups of respondents, including those from Black and other racially minoritised backgrounds, and LGBTQ residents, some described libraries as important for mental health, social contact, and community connection. The detailed exploration of these issues and the proposed mitigation are in the EIA at appendix 4.

3.65 The introduction of Libraries Extra unstaffed access or volunteer managed services at Hove was suggested; these options are not currently practicable as an alternative to reductions in hours. Opening later in the mornings and retaining a late closure was also suggested. Mornings are the busiest time of the day for the library and Council Help Desk; a change to start times would impact more people than the reduction in evening hours. The recommendation for Hove Library opening hours reductions remains the same as the original proposal.

Hollingbury

3.66 **Original rationale** The number of customers using this location is the lowest in the city; closure of this library will impact the least number of people. Hollingbury averages 7,000 visitors a year and 1,000 issues. The Patcham & Hollingbury ward contains two libraries, with Patcham and Hollingbury (Old Boat Corner) branches less than 2 miles apart. Footfall is considerably higher at Patcham (and consistently so) and management costs associated with Hollingbury's site are much higher than average; these contributed to the rationale for the proposal to close this library.

3.67 The original Needs & Use Analysis suggested that at ward level residents live at relatively low risk of deprivation. Ward residents are at a lower risk of digital exclusion than the city's average and 84% of residents own a car.

3.68 However, at a more granular level there are pockets of higher deprivation that should be acknowledged close to the centre in which the library is situated. This is detailed in the EIA given at Appendix 4.

3.69 Residents currently using Hollingbury Library would still be able to access statutory library services at other community libraries, including those close by in Coldean (2 miles), Moulsecoomb (3 miles) and Patcham (1 mile). The Old Boat Community Centre, where the library is based, remains a key community resource. In addition, the e-library provides access to many online resources and, for those unable to travel, the Home Delivery Service enables the service to meet the needs of residents and offset the impact of the proposed closure.

3.70 **Additional considerations** Although only 10% of respondents to the consultation use Hollingbury Library, it was clear that the impact on families and those with a low income was of concern. Some respondents said that they and their families would have no other way to access books if the library closed, due to the expense of bus travel to alternatives and the terrain between them making walking with children challenging. This would also be an issue for some elderly and disabled users. The impact of proposed changes on a range of people with protected characteristics is further explored in the EIA, appendix 4. Only 1% of the respondents indicated that Hollingbury was the only library they use. There are bus services available from the area to Patcham where the nearest alternative library is located.

3.71 Officers will continue to work closely with the Community Centre to explore how the council can support users of the centre who have the greatest needs, for example through donations of books and support for digital inclusion. There are particular concerns about the impact on those who rely on IT provision at the library if they are unable to get to an alternative library.

3.72 The development of the Moulsecoomb hub, 3 miles from Hollingbury, will provide a new library in 2027-28, improving accessibility and delivery of modern library services to the area, continuing to meet the statutory need to provide a comprehensive and efficient service to residents.

Rottingdean

3.73 The recommendation to close Rottingdean has been removed from the proposals for Cabinet.

3.74 **Original rationale** Rottingdean receives around 30,000 visits a year, and 12,000 items are borrowed. This level of use was in the mid-range when compared to other city libraries, with footfall higher than most other community libraries.

3.75 When the original Needs & Use Analysis was used as the rationale for proposals, the needs and geography of this area were considered. Rottingdean & West Saltdean is one of the least deprived wards in the city and is home to two community libraries, with Saltdean and Rottingdean branches less than 2 miles apart and well connected by bus. Changes to services at this library would impact a moderate number of individuals, but with low measures of deprivation and high car ownership, it was considered lower priority compared to others in the east of the city, including Whitehawk and Woodingdean.

3.76 The original rationale did acknowledge that the population of Rottingdean & West Saltdean is older than the city's average, with both the lowest percentage of 0-16s and the highest percentage of over 65s living in the ward. Nearly a third of the ward residents are over 65 but are the least likely in the city to be in receipt of Pension Credit.

3.77 Rottingdean Library was identified as a low priority library and recommended for closure partly due to its geographic position. In the east of the city there are three libraries situated close to each other in Saltdean (1 mile) and Woodingdean (3 miles). Both of the alternative libraries have bus links from Rottingdean, and are modern, accessible buildings with parking on site. These were agreed to be reasonable alternatives for residents to access library services, with the additional options of using central libraries and online services.

3.78 **Additional considerations** During the consultation there were more responses regarding Rottingdean than any other library and over 200 people attended the public meetings. Residents expressed concerns that closure would disproportionately impact those unable to travel to alternatives, such as the elderly, disabled, and families with young children. This ward has the highest number of older people in the city (31% of residents are over 65) and, according to the consultation responses, one of the highest proportions of disabled users among all branches. These customers value access to a community space within walking distance of their homes. Therefore, whilst there are regular bus services to other library locations, travel to alternative options could be more challenging for those residents in terms of accessibility and cost.

3.79 Many survey responses said that closure would increase isolation, reduce independence, and negatively affect mental health and wellbeing.

3.80 Rottingdean has a moderate level of usage which is considerably higher than that of Hollingbury or Westdene, therefore closure could impact a greater number of people. Rottingdean was identified as a location which could benefit from a community-led provision and variations on this were suggested during the consultation. This option could retain some access to book stock and meet the local need for a community space, using volunteers to maintain the offer. However, it was made clear during the consultation that residents could not resource this option within the timescales necessary to make the saving.

3.81 It is proposed that the library in Rottingdean is retained while options for alternative community-based provision are explored with partners. If alternatives are identified, a detailed review in line with guidance from DCMS would be conducted and could include further public consultation and equality impact assessment. A further report would be brought to Cabinet in around 12 months' time on any proposed changes.

3.82 The savings which could be achieved through closure of the library are relatively moderate and, on balance, the retention of the service while alternative options for community involvement are explored can be maintained whilst still achieving the majority of the overall saving for the Library Service.

3.83 The removal of the proposed closure for 2026-27 will reduce the savings achievable against the Library Service revenue budget by £40k and will provide additional financial pressure in subsequent years as the running costs of the location continue to rise without associated increase in revenue budget. Alternative savings will need to be made from elsewhere in the council revenue budget to offset the savings not made in Library Services through retention of this location.

<u>Westdene</u>

3.84 **Original rationale** The number of customers registered at this library is the second lowest in the city so closure would impact a relatively small number of residents. Westdene receives around 10,000 visits annually; its footfall is consistently lower than other community branches, currently forming 0.8% of the service's total visits. 6,000 items are borrowed annually; four times as much children's fiction as adult fiction is borrowed from this branch.

3.85 The original Needs & Use Analysis highlighted that the area has low measures of deprivation compared to the city average. Residents of Westdene & Hove Park ward are the most likely in the city to own a car and have qualifications. They are the least likely in the city to be digitally excluded, economically inactive or in receipt of benefits. It is the lowest scoring (least deprived) ward in Brighton & Hove with an IMD ranking of 28,634 and has the lowest number of economically inactive residents. The ward has the lowest crime rate in the city and children here are the least likely (by a significant majority) to be in receipt of free school meals.

3.86 The library is close to neighbouring Patcham Library and library data shows that those in the postcode sectors to the south of the ward already use neighbouring Hove and Hangleton branches.

3.87 For residents who are customers of Westdene there are alternative options within a short distance by car and bus links to the city centre. It is recognised that not all current customers would want or would be able to use public transport or car to travel to another library. However, the option of travelling to an alternative at Patcham (2 miles), Hangleton (3 miles) or one of the central libraries remains. In addition, the e-library provides access to many online resources and, for those unable to travel, the Home Delivery Service enables the service to meet the needs of residents and offset the impact of the proposed closure.

3.88 **Additional considerations** Many of the responses to the consultation reflected the value the school places on the library; it is adjacent to the school and there are regular class visits to supplement the school's library provision. While it is not the responsibility of the Local Authority Library Service to provide libraries for schools, it is recognised that closure would impact the school and pupils. Other responses to the consultation cited the difficulties particularly for elderly and disabled people accessing alternative libraries, indicating that there is no direct bus route to the nearest alternative library in Patcham and that it could be a difficult journey on foot. There is also limited allocated parking provision there. The various impacts on those with protected characteristics are further explored together with mitigations in the EIA attached as Appendix 4.

3.89 The recommendation to close Westdene Library remains a viable option to achieve savings whilst impacting a relatively small number of residents, with a range of options to offset that impact.

3.90 Officers will continue to work closely with the school to explore how Brighton & Hove and the Library Service can support pupils to access books and study space. There are options to explore which could provide an improved school library offer, with donations of books and furniture. For other residents, officers could also explore the option of community collections in the area.

<u>Conclusion on final proposals</u>

3.91 The revised and final proposals continue to support the rationale of protecting services in areas of greatest need. The data gathered through the extended Needs & Use Analysis and using the data from the public consultation, continues to support the original proposals for the closure of Westdene and Hollingbury Libraries and the reduction in hours at Hove and Jubilee.

3.92 According to the Libraries Basic Dataset 2023 from Arts Council England, Brighton & Hove City Council currently offers more library provision per resident than average across the country. Consideration was given to the travel times and convenience of library location; currently there are clusters,

particularly in the east and north of the city, with multiple libraries within 3 miles of each other. Were the proposal to reduce the city's libraries from thirteen to eleven to be taken forward, the city would still have more libraries per resident than the national average with a reasonable geographic spread.

3.93 Whilst it is recognised that any proposals to reduce services will affect some residents, most people will be able to access a comprehensive library service at the 11 remaining libraries, online and through the Home Delivery Service. Customers may need to alter their current usage habits and some will need to travel further, but the range of provision is still reasonably accessible.

3.94 If Cabinet approves the recommendations put to it in this report, officers will complete a staff consultation for library colleagues affected by any changes to rotas and sites. It is the intention of officers that any libraries agreed for closure will be decommissioned, with associated reductions in staffing, by April 2026.

4. Analysis and consideration of alternative options

Analysis of proposals

4.1 Any changes to public library provision will impact some residents. The consultation responses have made clear that the services provided in libraries are valued by their communities, and most respondents did not agree with the proposals to reduce opening hours or close libraries. However, in order to make the necessary savings and ensure an efficient service for the medium term, it was agreed at Budget Council that there is a need to reduce public-facing services.

4.2 Each financial year, budgets are reviewed, and options considered for offsetting increasing costs and meeting savings targets. In recent years the Library Service has taken action to reduce spending and make savings through closure of Mile Oak Library, reduction in staffed days at community libraries, deletion of vacant posts, restructure and reduction of the management team, closing the Booklover shop and moving other council services, including the Council Help Desk and Adult Skills, into libraries. Reducing opening hours and closing libraries is a difficult decision for the Council and only considered in response to an extremely challenging financial situation.

4.3 Officers acknowledge the impact that could be felt in communities affected by changes and are working on identifying actions to minimise this impact. There will be more work required to ensure the service is running as efficiently as possible into the longer term, and this will continue through the development of the next Library Service Strategy and through the council process of regular budget setting and review.

Analysis of alternative suggestions

4.4 A range of ideas for alternative ways to make the necessary savings and/or deliver services were suggested through the consultation period. Some of the most frequently suggested are examined below; a full list of suggestions is included in the consultation data summary, appendix 1 . Additionally, suggestions were gathered through meetings with local stakeholders; these included providing support for local schools to access library resources and to retain digital inclusion support in communities.

4.5 Some ideas have necessarily been discounted as not practicable, for example because they would not achieve the savings in the time allocated, or they require an expansion of services without allocated resource.

4.6 As per the recommendations at paragraph 2.1, if Cabinet were to agree to close libraries, it is recommended the Corporate Director for Families, Children and Wellbeing, in consultation with the Cabinet Member for Sport & Leisure, is given delegated authority to work with communities and colleagues to develop any practicable ideas.

Summary of alternative suggestions

Seek alternative funding (sponsorships, charging and membership)

4.7 During the public consultation meetings there was much discussion of the way public services and particularly libraries are funded. The Library Service is maintained through the Council's revenue budget. As a core statutory service, the funding needs to be permanent and reliable, to maintain the efficiency and sustainability of the service. Alternatives, such as sponsorship or donations, would not provide a sustainable or reliable income to maintain services.

4.8 Brighton & Hove already operates a donation system; the Libraries Legacy Fund helps provide a variety of cultural and creative events and activities in the city, such as children's author events for the Summer Reading Challenge. This adds value to the core offer maintained through the revenue budget.

4.9 In accordance with the Act, the Council has to provide a comprehensive and efficient service to all residents and those working, studying or visiting the city. This service needs to be free and accessible; fees for services and membership charges can be a barrier to access and are not a feasible option for offsetting the need for savings and there are statutory limitations on what can be charged for.

Reduce or alter hours at larger libraries to maintain smaller branches and protect evenings and weekends. Move closure hours to morning, not weekends or evenings. Flex the reduction in hours around needs across the year e.g. study times.

4.10 A range of alternative options were suggested for changes to opening hours, particularly at the two central libraries, Jubilee and Hove. Footfall numbers show that mornings in these libraries are busier than afternoons and evenings; therefore a reduction in morning hours to offset maintaining evening hours, would impact a greater number of people. Both central libraries contain the Council Help Desks, which are open 10am – 5pm. Any changes to opening hours can not impact on that core offer; opening the Help Desks without opening the libraries would not be practical and changing that core offer would impact residents' access to essential council services such as support with Council Tax, Parking and Benefits.

4.11 The consultation highlighted the potential impact on young people during the busy study seasons, particularly summer exams for secondary, college and university students. Flexing opening hours, as seen in some university libraries, to extend the hours during busier periods, was suggested. This would not be possible without a reduction in staffing at other times of the year, which could impact other users of the library, such as older people and families.

Reintroduce the mobile library service

4.12 The mobile library service used vans fitted with shelving for books and other resources. It provided regular visits to areas of the city not geographically close to library buildings. This service was discontinued some years ago due to rising costs and practical challenges of providing a mobile service, including the cost of maintaining and replacing vehicles. Community collections were set up in several areas which had previously been served by the mobile library to provide access to books, and the Home Delivery Service was expanded to meet the needs of customers who could not travel to other library sites. The reintroduction of a mobile library is not a viable alternative to savings through library closures as it would be more expensive to maintain and manage.

Provide community book collections

4.13 Community book collections are already in place in Hollingdean Community Centre and St Luke's Church; access to book stock can be supported in communities where a library building is no longer sustainable, and can build on relationships with other community groups and spaces, driving footfall and engaging with those who may be at risk of isolation. This model would require some input from the venue, with volunteers to tidy and maintain stock and to liaise with the Library Service for refreshing stock. It would not provide access to a full statutory library service but could mitigate concerns about access to free books, particularly in areas of more need, where the cost of travelling could be a factor.

4.14 This could be practicable for Hollingbury Old Boat Community Centre, where their existing book swap area could be enhanced and supported with stock from the Library Service. It could be provided for Westdene if a suitable venue was identified and officers could work with residents to explore options for this in the area.

Improve publicity and outreach to increase usage

4.15 Feedback through the consultation has highlighted a need to increase use and awareness of Libraries Extra. Similarly, the Home Delivery Service is highly valued by those accessing it. Although there is limited resource for increasing marketing activity, as a key way to offset reductions in opening hours and supporting more flexible use of libraries, it is important more residents are empowered to access these services, and this will be considered in the development of the new Library Service Strategy. Any additional resource implications of increased take-up need to be considered going forward.

Community run models

4.16 Library Authorities around the country have a wide range of delivery models, with varying levels of Local Authority involvement, including CICs and volunteer-led libraries. Brighton & Hove Library Service have offered support to community groups in the areas affected by changes to explore options for this type of delivery model. The service could hand over furniture, book stock and shelving and provide support to set up a community space. The Council would not retain any responsibility for the operation or provision of these services and they would no longer be part of the statutory library provision, however, they could still meet some of the needs of the community, providing a third space in their locality, access to books and opportunities for volunteering.

4.17 However, feedback from communities during the consultation has expressed concerns about their capacity to take on this level of responsibility and the resources needed to sustain a service long term. The Council remains open to exploring options for community-led library spaces.

Explore third-party provider options

4.18 In February 2025, there was a Budget Council decision to make savings within the Library Service in the financial years 2025-27. There was no requirement to review the long term delivery model or explore third party options at this time.

4.19 To make changes of this extent would require a long term strategic review for the whole service. Any changes must maintain and support the provision of a comprehensive and efficient library service and benefit the city beyond limited short term or localised savings. Whole delivery model reviews are costly, complex and time-consuming pieces of work; if this were pursued, it would not achieve the agreed savings within the allocated timeframe.

4.20 The new Library Service Strategy will be reviewing the medium- and long-term sustainability of the service, and options for alternative models of provision could be considered if they were to meet the needs of the service and residents of the city.

Rebalance staffed and Libraries Extra days across sites

4.21 It was suggested through the consultation that Libraries Extra and staffed days could be reallocated across the 11 community libraries in order to achieve savings and reduce impact on some of the libraries proposed for closure.

4.22 Libraries Extra (LE) days were increased by 7, reducing staff numbers across 6 libraries, to meet savings in 2023-24. Consideration was given to the spread of staffed days across different geographic areas and days of the week. For example, days at Hangleton and Portslade were retained to offset the impact of closing Mile Oak Library.

4.23 Redistribution of LE days could mitigate some of the impacts of reductions in services but would only address the reductions in staff costs. Part of the savings will be met through the closure of sites and related reduction in running costs. To achieve the savings whilst maintaining those running costs would necessitate additional unstaffed days, achieving savings through staff reductions. This would increase the potential impact on residents in more areas of the city and the risk of redundancy for staff.

4.24 Experience and data show that fewer people use libraries during LE, which impacts on overall usage. People prefer to use the library when there is a member of staff there, and the consultation results agree with this. LE isn't fully accessible; young people under 16 can't use it and people with disabilities cannot always access the spaces when unstaffed.

4.25 Any reduction in services could affect residents. The proposals were developed with the aim of minimising impact on those areas of the city with the most need. Increasing Libraries Extra days across other libraries could impact a greater number of communities across the city.

4.26 The introduction of Libraries Extra to Jubilee and Hove Libraries was also suggested, as a way to retain some access during the times proposed for closure. Currently the buildings are not suitable for this level of unstaffed access, as they require a daily security presence and on-site staff to manage the large number of visitors each day. The development of this type of access would require considerable investment and potential changes to the buildings; these could be explored if deemed appropriate in future years.

Increase use of volunteers or replace paid staff with volunteers

4.27 Brighton & Hove City Council have not developed or considered proposals to replace paid staff with volunteers. Changes of this nature would need considerable development and consultation with staff and trade unions.

4.28 Replacing staff with volunteers does not sufficiently reduce costs, as they require significant management oversight, training, support and guidance. This would not achieve the broader service budget reductions as planned.

4.29 The Library Service has an existing and successful volunteer programme. Providing volunteer opportunities positively impacts the service, by adding value to core services, and can also reduce loneliness and increase wellbeing for those volunteering. While it is likely the use of volunteers will be developed as part of the next Library Service Strategy, this would require time and staff resource and could not be achieved within the timeframe for savings, whilst maintaining a comprehensive statutory service.

4.30 However, where existing volunteer roles exist, the service will consider where this resource could support the service through the proposed changes to provision. The Home Delivery Service works with a network of volunteers to deliver books to residents who cannot easily leave their homes due to disability or caring responsibilities. By increasing the number of volunteers, this service could be extended to meet the needs of those residents who may be impacted by the closure of a local library building.

4.31 Where communities and individual residents have engaged with the service during the consultation, it is clear there is a high level of interest in and care for libraries within communities. Those who have offered their support for their local libraries may wish to continue that support through giving time as volunteers.

Support local schools to maintain access to books

4.32 Throughout the consultation, the links between local schools and public libraries have been highlighted. This was particularly strongly expressed in Westdene, where the public library is part of the school building, albeit with its own separate entrance. Concern was raised that the reduction in public library services in that location could impact school pupils who have limited dedicated space and resources within the school.

4.33 Brighton & Hove City Council could explore ways to support the school to continue to provide access to books for pupils; there are options for the school to set up a school library in the space vacated by the public library or to improve their existing library area. The service could hand over furniture, shelving and children's book stock and provide support in the short term to set up a dedicated school library. These options would need to be scoped in more detail, working closely with the school.

4.34 The Library Service would fully withdraw from the space and would no longer provide a library at that site. This option would not provide a public library provision or community space for residents but could continue to meet some of the needs of the school. Residents could continue to access a fully comprehensive library service by using alternative sites and online resources.

Support communities with digital inclusion

4.35 The Needs & Use Anaysis and feedback during the consultation highlighted the need for accessible wifi and computer facilities in community venues and the impact on local residents who are not digitally confident. Survey

responses indicated that computer use was a key reason for customers visiting libraries.

- Computer use and printing (710 respondents - 28%)
- Using wifi (818 respondents - 30%)
- Study/Homework (536 respondents - 20%)
- Work (611 respondents - 23%)

4.36 The closure of libraries and reductions in opening hours will impact on those who are currently using library computers; they will need to travel further or change their visiting times to be able to access these facilities. The impact of the loss of IT facilities if Hollingbury Library were to close has been raised by residents and the Old Boat Community Centre. A suggested mitigation for this impact, for the Council to continue to provide wifi and to donate IT equipment no longer in use by the library service, is being considered to enable the centre to continue to support residents in this way. This would incur a cost to the Council and the centre would need to be able to maintain support for the facility in the longer term.

4.37 The Library Service could continue to advertise its Libraries Connect computer support volunteer service at the centre, which could be delivered at other library locations as part of the statutory, comprehensive service. This mitigation could be explored in other venues for areas where libraries are proposed to close.

Reduce savings targets for libraries and reallocate to other council services

4.38 The financial challenges facing the Council impacts on all services, not only libraries. All Directorates are working to reduce their revenue budget spending and achieve savings in the short and medium term. The significant amount of saving identified for the Library Service could not be reallocated to other council services without similarly serious impact in other areas.

4.39 This suggestion has been considered and actioned with regard to Rottingdean Library. The saving identified and associated financial pressures for 2026-27 have been reallocated into the council's saving targets.

Impact & mitigations

4.40 A range of mitigations have been identified to offset the impact of reductions in public library services. These are explored in more detail in the Equalities Impact Assessment; they can broadly be summarised as:

- Ensure communications about any agreed changes to library services are fully accessible to all affected groups.
- Continue with targeted engagement and support for vulnerable groups about the changes and how to access alternative services
- Establish ways of monitoring any impacts and of reviewing and adapting mitigating actions as required

4.41 We will further explore and develop alternative options as described above.

5. Community engagement and consultation

Public consultation activities

5.1 DCMS requires a public consultation period for any proposals to change statutory library services, in order to engage with residents, users and non-users. Changes to opening hours and library closures were included in a public consultation which ran for 12 weeks from 18 July to 10 October 2025, see appendix 1 for a summary of the consultation responses.

5.2 The consultation responses included:

- 2711 survey responses
- 164 emails
- Nearly 400 people attended 9 public meetings, online and in person

Consultation engagement

5.3 The consultation and associated survey were publicised online, in libraries and other council buildings. Councillors and officers met with a range of stakeholder groups on request, including Rottingdean Parish Council, the Save Our Library (Rottingdean) campaign, Old Boat Corner Community Centre and Westdene Primary School.

5.4 City schools were informed via the schools' bulletin and schools closest to libraries affected by the proposals were contacted directly with the offer of additional support to enable pupils' and teachers' engagement with the consultation.

5.5 Stakeholders and community organisations were contacted with information about the proposals and survey and were invited to share a response as an organisation or group. They were also asked to share details with a wide range of residents from across the city, including young people, those living with disabilities, those at risk of digital exclusion, Black and Racially Minoritised diasporas, older people, care leavers, the LGBTQ+ community, those with neurodivergence, low-income families and those experiencing mental health issues. A range of visits were also made by library staff to community groups, including the Network of International Women, StoryTree and the Social Prescribers Forum to give additional support to engage with the consultation.

5.6 Monitoring data received via the survey and the level of email responses were both evaluated throughout the period. As of 9th September, only 6% of respondents that shared monitoring information were from Black and Racially Minoritised background, which was not representative of the city's residents, 26% from Black and Racially Minoritised backgrounds (Census 2021).

5.7 Partner organisations and colleagues were proactively approached for support to ensure the range of voices heard were as diverse as possible. Additional online marketing that features more diverse imagery (of real library customers) was created to support engagement with Black and

Racially Minoritised residents on the proposals. At the consultation conclusion, 12% of respondents identified as being from a Black or Racially Minoritised background, doubling that area of engagement.

Consultation responses

5.8 The detailed response data is available in the Summary of Consultation Responses, appendix 1. The majority of respondents do not agree with the proposals for reductions in services; they see libraries as vital public spaces whose closure or reduction would have far-reaching negative impacts.

5.9 The following themes were identified through the consultation process and a response is provided to each of them below.

Opposition to reduction in library budgets

5.10 Respondents overwhelmingly oppose library closures and reductions in opening hours, describing libraries as vital, irreplaceable community assets that provide much more than just access to books.

5.11 Many respondents believe the proposed savings are small compared to long-term social and educational costs. They urge the council to find savings elsewhere.

5.12 The concerns expressed about reductions to the Library Service budget are understood. The report sets out how the impacts of the savings will be mitigated and how a comprehensive and effective library service will be delivered. The report also sets out how the savings amount for Rottingdean Library has been removed from the Library Service savings.

Concerns over impact on children and literacy, and schools' use of libraries

5.13 Many stress the crucial role libraries play in encouraging children to read, supporting schoolwork, and providing educational opportunities that may not be available at home.

5.14 Many parents and carers described libraries as essential for children's literacy and development, offering access to books they could not otherwise afford and providing educational activities. School links were highlighted as important, and libraries located near schools are especially valued.

5.15 The view that libraries are important for children's reading skills and enjoyment of reading is fully accepted. The children and young people's offer across the city's Library Service will continue to be promoted and developed. Supporting the communities using libraries proposed for closure with ongoing access to books and resources for children and young people will be work undertaken in t2026.

Loss of study space for young people and students

5.16 There was strong opposition to reducing Jubilee and Hove's opening hours, with many respondents stressing that current late openings and weekend hours are essential for people who work full-time, parents, students, and families. Students under 16 are unable to use Libraries Extra unaccompanied, limiting their access to alternatives.

5.17 A wide range of learners wishing to study within the Council's libraries is welcomed, and the impact of earlier closing of central libraries is recognised. Libraries Extra will continue to be available in community libraries during the hours proposed for reduction at Jubilee and Hove and the service will retain two late nights at Jubilee on Tuesdays and Thursdays.

Libraries as 'third' spaces that support community cohesion and reduce social isolation

5.18 Libraries were repeatedly described as safe, warm, and inclusive spaces that support social connection, wellbeing, and provide free spaces for all ages, especially children, the elderly, low-income families, and vulnerable groups.

5.19 Libraries were also described as safe havens for LGBTQ+ people, migrants, and other minorities - places where they feel welcome and can access relevant resources. Several respondents mentioned the importance of libraries as neutral spaces for community cohesion and integration.

5.20 The feedback shared by library users about their feeling of safety and support within city libraries is welcomed. The Council recognises the concerns raised during the consultation and will continue to work with communities in the city to understand and respond to needs appropriately within the Library Service, as detailed in the EIA, appendix 4.

Difficulty travelling to alternatives, particularly for families, elderly and disabled

5.21 There was strong concern that closures or reduced hours could disproportionately affect those who cannot easily travel further, such as people with disabilities, older people, families with young children, and those on low incomes.

5.22 Concerns were expressed about financial constraints and public transport costs, as well as the inconvenience of travelling longer distances to reach another library.

5.23 While some would consider driving to the next available library, parking is cited as a barrier to this (the example of limited spaces in the on-site car park at Patcham being given by multiple respondents).

5.24 Parents with young children highlighted the difficulty of travelling to alternative libraries, especially when they rely on walking or public transport due to climate change concerns and financial constraints.

5.25 The concerns of residents regarding additional or more challenging travel options are acknowledged. Some customers will need to travel further to access services, but the proposals retain 11 libraries across the city, in areas which are accessible by public transport or by car. Online services support those who wish to travel less, with online ordering and loan renewal as well as access to e-resources.

Digital and financial exclusion

5.26 Digital exclusion was frequently mentioned and the fact that libraries provide essential internet and computer access for those who cannot afford it at home, which is crucial for job-seeking, benefits, homework and administrative tasks.

5.27 Libraries are seen as one of the last remaining places where people can spend time without having to spend money or face commercial pressures.

5.28 The Council appreciates the impact of internet and computer access in communities. Those who are digitally less confident can be supported through the Library Connect network of volunteers, which will continue to operate from the remaining libraries.

5.29 The feedback that libraries are a free and warm space is recognised. The Council will continue to work with communities in the city to understand and respond to needs appropriately within the Library Service, as detailed in the EIA, appendix 4.

Jubilee & Hove

5.30 There was a strong response to retain late nights and weekends at Jubilee and Hove Libraries, noting these are peak times for working people, students, and families.

5.31 Many respondents strongly disagreed with the proposal to reduce Jubilee Library's opening hours. There was particular emphasis on the importance of Sunday afternoons for families, and the importance of weekday evenings for students.

5.32 The Council acknowledges that the impact of any changes at the central libraries will impact on the greatest number of people, due to the high levels of use. The service would retain 11 libraries across the city and 7 day/week access.

Community libraries

5.33 There was a strong response to keep Rottingdean and Westdene libraries open. Respondents highlight their usage (especially by children and older people), their role as community and cultural hubs (Rottingdean Library's position within The Grange), proximity to schools, and the minimal financial savings compared to the social cost. Many argue that closing these libraries would increase isolation and reduce access for those unable to travel.

5.34 The Council acknowledges the impact of changes at community libraries upon residents in those areas. The Council will continue to work with communities in the city to understand and respond to the needs of specific areas, particularly where libraries are proposed for closure.

5.35 Suggestions were made for alternative ways to make savings or deliver services, as at paragraph 4.4

5.36 59% of respondents shared monitoring information which is summarised, alongside all of the consultation data in Appendix 1. As well as being asked about their use of libraries services, respondents were asked if they would be impacted in relation to their personal characteristics and these responses were taken into consideration in development of the Equalities Impact Assessment, appendix 4.

6. Financial implications

6.1 The net General Fund budget for the Libraries Service in 2025/26 is £4.3m, whilst the gross budget after allowing for income is £6.3m. The employee staffing element of the budget is approximately £2.6m.

6.2 The total savings assigned to the Libraries Service in 2025/26 was £0.111m £0.042m has been achieved through operational streamlining in 2025-26.

6.3 Within the Medium Term Financial Strategy further savings of £0.140m have been identified for 2026/27 to be met through reductions in library services and staff hours.

6.4 The impact on savings of removing Rottingdean Library is £30k, which is made up of £25k direct costs and £5k associated management costs.

6.5 As a consequence of rising costs and Rottingdean Library remaining open, there is likely to be an additional pressure of £10k in 2026/27 for this library. Therefore, in total the proposed Libraries savings in 2026/27 have been reduced by a total of £40k taking the total from £140k to £100k.

Name of finance officer consulted: Steve Williams Date consulted: 27/11/25

7. Legal implications

7.1 A decision to change the operation of the library service must be made in accordance with the statutory duty in Section 7 of the Libraries and Public Museums Act 1964. The Cabinet needs to be satisfied that, if the changes proposed in the report are made, the Council as a library authority will still be able “to provide a comprehensive and efficient library service for all persons desiring to make use thereof.” The duty relates to those whose residence, place of work or study is within the Council’s area. In fulfilling its duty, a library has to have regard to the desirability of (a) securing that facilities are available for the borrowing of books and other materials, sufficient in number, range and quality to meet the requirements of both adults and

children and (b) of encouraging both adults and children to make full use of the library service, and of providing advice as may be required by persons using it.

7.2 Case law has clarified that "a comprehensive service cannot mean that every resident lives close to a library. This has never been the case. Comprehensive has therefore been taken to mean delivering a service that is accessible to all residents using reasonable means, including digital technologies. An efficient service must make the best use of the assets available in order to meet its core objectives and vision, recognising the constraints on council resources." *Bailey v London Borough of Brent [2011] EWHC 2572 (Admin) (approved by the Court of Appeal [2012] EWCA Civ 1586).*

7.3 The Department of Culture Media and Sport has produced non-statutory guidance entitled "Libraries as a Statutory Service" (updated 21 February 2025) which is designed to assist councils when considering its statutory service and in particular when proposing changes to it. This includes reference to the need to demonstrate plans to consult with local communities alongside an assessment of their needs. A "Needs and Use Analysis" in two parts is attached to this report and should be considered by the Cabinet when making its decision. Case law has also indicated the importance of an analysis of needs if making changes to provision.

7.4 Given the nature of the changes proposed, a period of consultation with those potentially affected has been carried out. The process of consultation has been done in accordance with the *Gunning* principles:

- Proposals were consulted on at a formative stage to allow for genuine input and potential changes prior to any final decision.
- Consultees were provided with sufficient information about the proposals to understand them and provide meaningful feedback.
- Sufficient time had to be given for respondents to participate in the consultation process- in this case 12 weeks was given
- The consultation responses need to be conscientiously considered by the Cabinet before making a final decision.

7.5 A summary of the consultation responses has been provided as appendix 1, and these have been further analysed in part two of the "Needs and Use" analysis and the Equality Impact Assessment which are both attached, and in the report itself which includes a consideration of the responses to points that were put forward.

7.6 The Equality Act 2010 states that, when carrying out their functions, public bodies must have "due regard" to the need to eliminate discrimination, and advance equality of opportunity and foster good relations between those who share a "protected characteristic" and those who do not (Equality Act 2010, Section 149). Case law indicates that due regard means "the regard that is appropriate in all the particular circumstances in which the public authority concerned is carrying out its function as a public authority" but that it is a duty to give due regard rather than achieve a particular result. It also

means that the public body should take account of any countervailing factors.

7.7 An equalities impact assessment has been carried out in relation to the recommendations. Cabinet needs to have significant regard both to the equality impact assessment itself and to the analysis of it in the body of this report. This is particularly important given that the equality impact assessment has identified negative impacts for some people with different protected characteristics, including age (both for older people and children) and disability.

Name of lawyer consulted: Allan Wells Date consulted: 25/11/2025

8. Risk implications

8.1 Local Authorities have a statutory duty under the Public Libraries and Museums Act 1964 to provide a comprehensive and efficient library service for all persons who live, work or study in the area (section 7). Case law indicates that consideration of the duty can take into account the constraints on council resources. Any changes to provision can be challenged at any time through a complaint to DCMS. The processes followed and decision making can be challenged through Judicial Review.

8.2 If changes are made to the library service, staff will then be part of a consultation on changes to their roles and rotas. Risks which could impact on staff will be addressed in a separate Equality Impact Assessment and a full support package as part of the staff restructure consultation period. The integration of other services has also impacted staff and added to the levels of change being managed by the team. This level of change presents the risk of potential for industrial unrest. Colleagues have been engaged in the consultation process as key stakeholders and all staff are supported through the usual HR processes and line management.

9. Equalities implications

9.1 The Equality Impact Assessment has been updated. The original Needs & Use Analysis informed the first EIA, which particularly indicated possible impacts on those under 16, older people, those with disabilities, those from black and racially minoritised communities, women, carers, those experiencing homelessness, and those experiencing socio-economic disadvantage.

9.2 The public consultation period provided additional feedback and information from respondents about how the changes could impact them, and if they would be impacted in relation to their personal characteristics. This data has been used in the development of the extended EIA, appendix 4, which examines the potential impact of each proposal on each of the affected groups.

9.3 It is recognised the proposed changes to library services are likely to impact a large number of people and could have more impact on certain groups or

in certain geographic areas. There could be a disproportionate impact on vulnerable groups in the city, including disabled people, older people, children and young people, carers, migrants, refugees, and those living in poverty. These groups are more likely to rely on libraries for access to resources, including internet and computers, and safe spaces to meet and spend time within their community.

9.4 The consultation highlighted particular concerns about the potential impact on older people and the availability of community spaces in the areas proposed for closures. Libraries are valued as free spaces to improve wellbeing and decrease loneliness.

9.5 There were also responses highlighting the potential impact on children and young people, particularly children in the community libraries and young people studying in the central libraries. It's recognised that libraries help level the playing field for children and families from disadvantaged backgrounds by providing free access to books, learning resources, and enrichment activities. Reductions in access to services risk widening educational and social inequalities.

9.6 The EIA includes possible mitigations for those impacts, and the Library Service is committed to responding to the needs of all residents to continue to provide a comprehensive service across the city.

9.7 The EIA concludes with a series of SMART actions to ensure those mitigations are taken forward. These broadly fall into three areas of work:

- Ensure communications about any agreed changes to library services are fully accessible to all affected groups.
- Continue with targeted engagement and support for vulnerable groups about the changes and how to access alternative services
- Establish way of monitoring any impacts and of reviewing and adapting mitigating actions as required

10. Sustainability implications

10.1 Travel is kept to a minimum, but, where necessary, active and sustainable travel is prioritised. The proposals retain 11 libraries across the city, in areas which are accessible by public transport, and many of which are co-located with or close to other community assets such as schools, shops, Family Hubs and GP surgeries. Online services support those who wish to travel less, with online ordering and loan renewal as well as access to e-resources.

10.2 Through the consultation, the service has heard that customers value having access to a library within walking distance of their home and that they use the service in conjunction with other journeys, such as school pick-ups and shopping trips. Maintaining services within communities enables residents to minimise journeys by car or public transport. Brighton & Hove enjoys an excellent and comprehensive network of public transport including buses and trains, and a network of cycle lanes and traffic calming to incentivise greener transport options. However, some residents will need to journey by car due to their needs, such as disability or young families, which makes

public transport journeys less practical for them or where the public transport links from their home to a particular library are not very practicable.

10.3 The areas where there are proposed closures are served by frequent bus routes. For Westdene the number 27 runs between Westdene and Saltdean, via the city centre but also passing bus stops where changes to other bus routes are provided. Hollingbury is well served by the number 46 route and several of the 5s – which enable connections and some direct routes to Patcham Library. A map indicating these bus routes is included in the EIA.

10.4 The Council is exploring ways to make the best use of resources, including buildings. The co-location of libraries with other community spaces is part of the long-term sustainability strategy, including a new library in the Moulsecoomb Hub in 2027-28, co-location of Council Help Desks and Adult Education & Skills at Jubilee in place from 2025. The service is actively seeking other opportunities to share spaces in communities, to both reduce running costs of libraries and improve access for residents.

11. Health and Wellbeing Implications:

11.1 Throughout the consultation, respondents (both within the survey and at public meetings) highlighted health and wellbeing implications associated with proposed reductions to library services. Some emphasised that libraries are seen as vital safe spaces for social connection, combating loneliness and isolation, particularly for older adults, disabled people, carers, and parents/carers with young children. Libraries were described by some as essential spaces, providing a warm, welcoming environment for those who may otherwise struggle with social exclusion, digital poverty, or the ongoing cost of living crisis. Some noted that as libraries offer free access to books, information, and digital resources, these can support both lifelong learning and emotional wellbeing. The proposed loss or reduction of local library services was linked by respondents to increased risks of social isolation, reduced opportunities for community engagement, and diminished access to educational and cultural resources, all of which could have a detrimental impact on the health and wellbeing of individuals and the wider community.

11.2 The savings will be made mostly through a reduction in staff numbers with an associated risk of redundancy and associated impact on wellbeing. Wherever possible, the service is holding vacancies to minimise the risk of redundancy. All staff consultations are supported by HR and include the option of retraining and redeployment. Early and regular engagement with all Library Service staff has been maintained through the public consultation phase and line managers will continue to support their teams through the staff consultation period.

Other Implications

12. Procurement implications

12.1 There are no procurement implications resulting from this report or its recommendations.

13. Crime & disorder implications:

13.1 There are no crime and disorder implications resulting from this report or its recommendations

14. Conclusion

14.1 The report outlines proposed changes to the city's library services.

14.2 The report has detailed the processes followed and steps taken to examine and understand the needs of residents. The report recommendations would support the library services to continue to meet those needs and provide a sustainable and affordable library service across the city, particularly focused on serving those in most need.

14.3 Cabinet are asked to approve the recommendations. The proposals enable the Library Service to meet the majority of the savings allocated whilst maintaining a comprehensive and efficient library service for the city.

Supporting Documentation

1. Appendices

1. Summary of Consultation Responses Report
2. Needs and Use Analysis Part 1
3. Needs and Use Analysis Part 2
4. Equalities Impact Assessment

2. Background documents

1. Report for Cabinet in July 2025 "Library Sustainability Plan"
2. EIA produced in July 2025 to inform public consultation – available in July 2025 Cabinet papers

Brighton & Hove City Council Sustainability Plan for Libraries

Summary of public consultation responses 2025

Why we held a public consultation

In July 2025, City councillors agreed to hold a public consultation on the proposed closure of 3 community libraries and changes to the opening hours of Jubilee and Hove libraries.

These proposals were part of a wider strategic plan for Brighton & Hove libraries, which included the introduction of customer service points earlier this year and some reductions in vacant staff posts.

The consultation invited views on whether the library spaces proposed for closure could continue to be provided through a different operating model, for example transfer to a community or voluntary sector organisation.

The wider plan aims to ensure Brighton & Hove City Council maintains a sustainable and affordable library service across the city, particularly focused on serving those in greatest need. If agreed, these proposals would maintain 10 libraries across Brighton & Hove.

The proposed changes to library services in Brighton & Hove covered in this public consultation were:

- Closing Hollingbury, Rottingdean and Westdene libraries
- Reducing the opening hours of Jubilee Library by 2 hours on Monday evenings and by 3 hours on Sunday afternoons
- Reducing the hours of Hove Library by 2 hours on Wednesday evenings and by 3 hours on Saturday afternoons

Officers considered a number of factors when looking at the libraries proposed for closure, based on their use and the needs of the communities in the areas they serve.

This included an analysis based on economic activity and receipt of benefits and free school meals to prioritise areas in most need, as well as each library's usage, the proximity of alternative community libraries and operational costs.

The proposed changes at Jubilee and Hove libraries reflect the times when the fewest people access them.

The Department for Culture, Media and Sport requires a public consultation for any proposals that reduce or significantly change statutory library services.

How the consultation ran

The consultation ran for a period of 12 weeks from 18 July - 10 October 2025.

The consultation included:

- A survey open to anyone, hosted on the council's YourVoice website, open from 18 July until 10 October 2025. The survey was available online and in paper format from libraries.
- 2 publicly advertised online consultation meetings held in July and October.
- 3 drop-in sessions at Hollingbury, Rottingdean Westdene Libraries
- 4 in-person consultation meetings spread throughout the time period - 2 planned for Jubilee Library and Hove Town Hall, 2 added in response to high levels of interest at Westdene Primary School (on the same site as Westdene Library) and St Margaret's C of E Primary School (near to Rottingdean Library).

There was a general email address available for questions and representations – libraries.consultation@brighton-hove.gov.uk plus residents submitted Member enquiries and enquiries to the Customer Feedback Team. During the consultation, a number of FOI requests were also made.

A Young People's Guide and an Easy Read Guide to the consultation were created and made available on the Your Voice platform alongside the survey and proposal documents. The availability of the information in accessible formats was also promoted.

Consultation marketing and engagement

The consultation and associated survey were publicised (via flyers, posters, stickers, digital screens and word of mouth) in Libraries, at Council Help Desks, the Homelessness Help Desk and Family Hubs. Publicity was also supported by local organisations and businesses, particularly those in close proximity to the affected library branches.

Council and Libraries' social media accounts were also used to share the information.

Tannoy announcements were made at Jubilee during the proposed affected hours to increase visibility of the consultation and staff engaged in person with customers, raising awareness of the proposals and promoting the survey.



Library user stakeholder engagement

Targeted communication and engagement was made with regular library users who book rooms and/or meet in libraries. This included the citywide library network of book groups and community groups that meet regularly in libraries. This enabled groups who may be directly impacted to have the opportunity to consider and respond to the proposals.

Wider stakeholder engagement

Over 100 local stakeholder / community organisations were contacted with information about the proposals and survey and were invited to share a response as an organisation or group directly via the consultation email address or to complete the survey. Stakeholders were also asked to share details of the proposals and the survey/meetings and email address with their networks - a wide range of residents from across the city, including young people, those living with disabilities, those at risk of digital exclusion, Black and Racially Minoritised diasporas, older people, care leavers, the LGBTQ+ community, those with neurodivergence, low-income families and those experiencing mental health issues, reaching communities all across the city. A follow-up reminder email was sent to all stakeholders halfway through the consultation period.

City schools were informed via the city's schools bulletin and an accompanying article. Schools closest to libraries affected by the proposals were contacted directly by the

Libraries' Senior Management Team with the offer of additional support to enable pupils' and teachers and school staffs' engagement with the consultation.

Councillors and officers met with a range of stakeholder groups on request, including Rottingdean Parish Council, the Save Our Library (Rottingdean) campaign, Old Boat Corner Community Centre and Westdene Primary School.

A range of visits were also made by library staff to community groups, including the Network of International Women, StoryTree and the Social Prescribers Forum to give additional support to engage with the consultation.

Responsive marketing throughout consultation period

Monitoring data received via the survey and the level of email responses were both evaluated throughout the period. As of 9th September, only 6% of respondents that shared monitoring info were from Black and Racially Minoritised backgrounds – this was not representative of the fact that 26% of the city's residents are from Black and Racially Minoritised backgrounds (Census 2021).

Partner organisations and colleagues were proactively approached for support to ensure the range of voices heard were as diverse as possible.

Additional online marketing that features more diverse imagery (of real library customers) was created to support engagement with Black and Global Majority residents on the proposals.

At the consultation conclusion, 12% of respondents identified as being from a Black or Racially Minoritised background.

How people responded to the consultation

2711 completed responses were made to the YourVoice survey – it was possible for individuals to submit multiple entries

164 emails were sent to the consultation email address which have been accepted as responses to the consultation

1 formal member enquiry was received during the consultation

374 people engaged with 9 public consultation meetings, online and in person

Summary of the consultation

Explanatory note:

This report provides a summary overview of responses received to the public consultation. It includes a summary analysis of the Your Voice survey, of the emails received directly to the council, of group/organisational responses, and a summary of the comments/questions raised at the meetings facilitated by the council.

The full raw data from the survey, the emails and letters cannot be shared publicly because they could contain personal and sensitive information which might identify the consultee and which the council is therefore not able to put into the public domain.

Please note that AI has been used to support the summary analysis of the free text responses to the YourVoice survey. Officers have read all individual responses, and AI has been used to support the collation of themes and summaries.

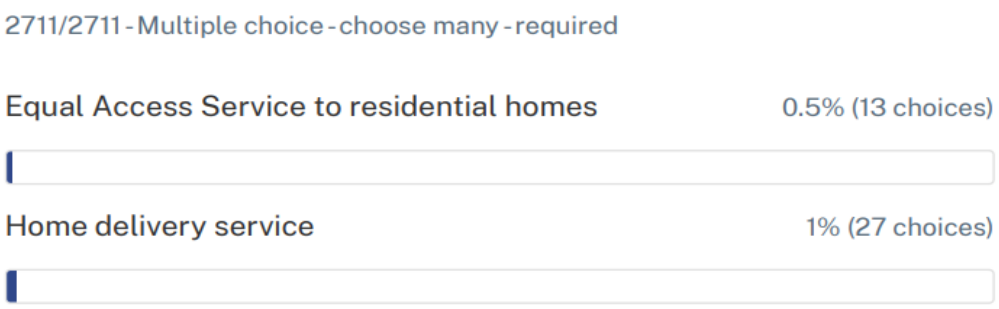
Survey Responses

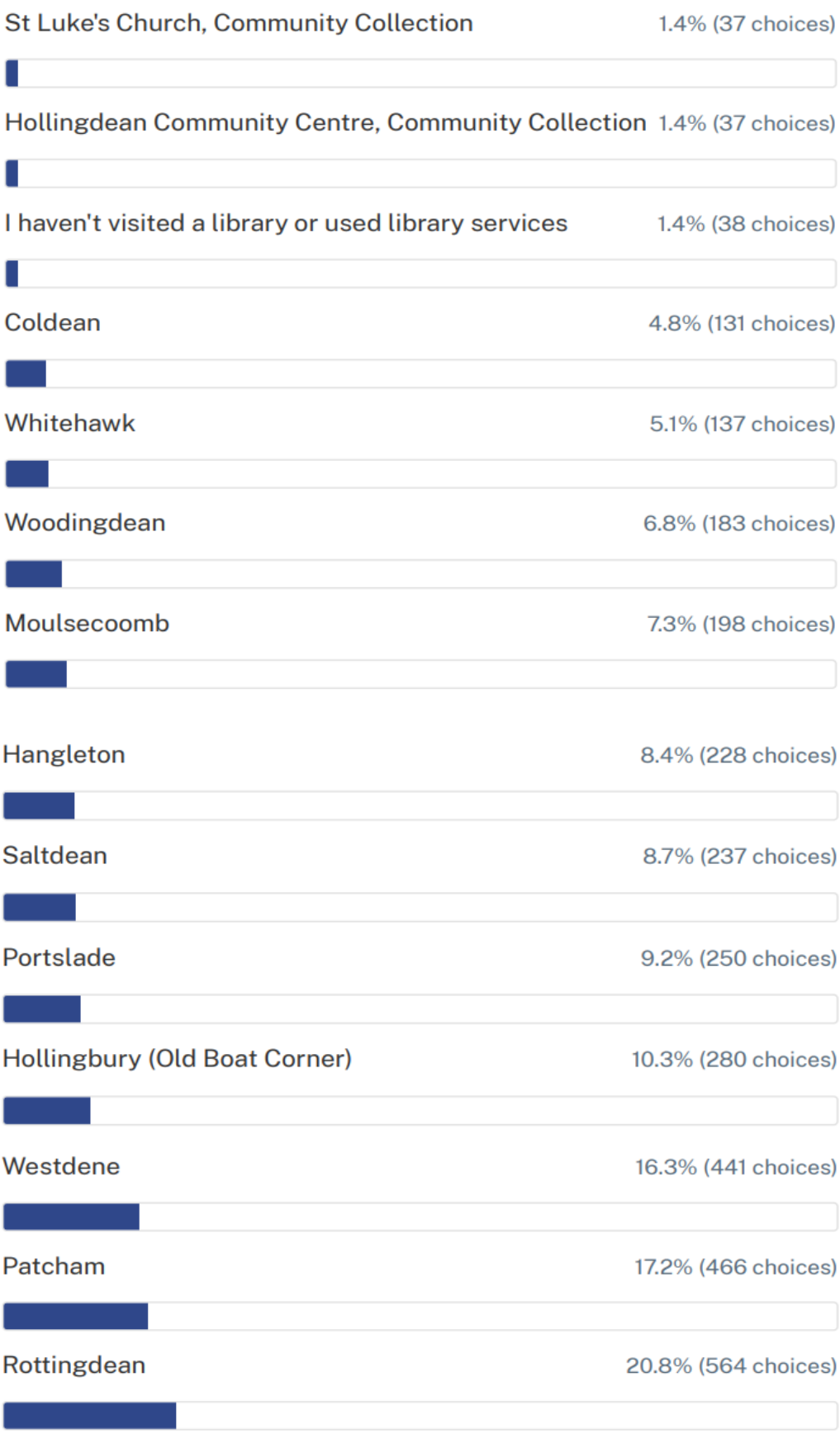
A total of 2711 people responded to the online survey. All responses were anonymous, and we encouraged views from both users and non-users of Brighton & Hove libraries services.

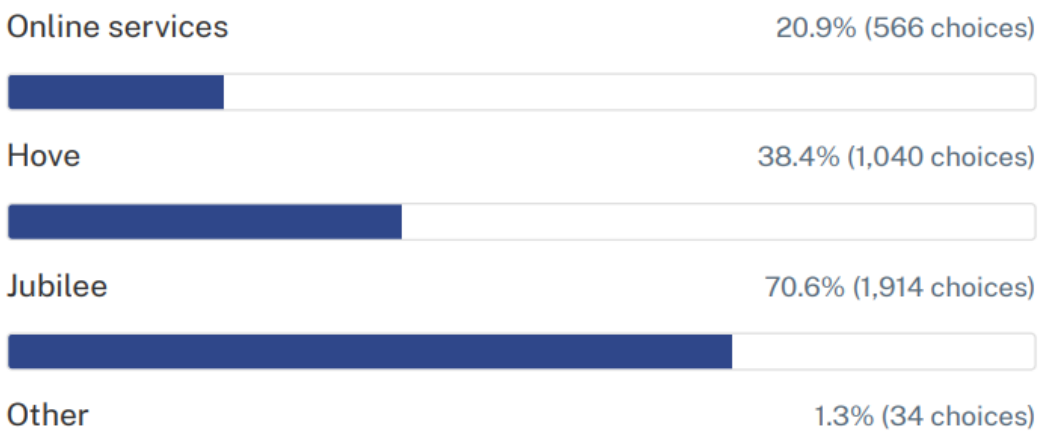
This section addresses each individual survey question, providing a summary of responses and descriptive statistics where appropriate.

Q1. Which libraries and services have you used in the past 12 months?

A range of checkboxes were offered and there was no limit to the number of boxes responders could tick. Options included Community Collections at St Luke's Church and Hollingdean Community Centre, as well as Equal Access, Home Delivery and online services. There was also the option to declare that the respondent does not use library services.




St Luke's Church, Community Collection 1.4% (37 choices)
Hollingdean Community Centre, Community Collection 1.4% (37 choices)
I haven't visited a library or used library services 1.4% (38 choices)
Coldean 4.8% (131 choices)
Whitehawk 5.1% (137 choices)
Woodingdean 6.8% (183 choices)
Moulsecoomb 7.3% (198 choices)
Hangleton 8.4% (228 choices)
Saltdean 8.7% (237 choices)
Portslade 9.2% (250 choices)
Hollingbury (Old Boat Corner) 10.3% (280 choices)
Westdene 16.3% (441 choices)
Patcham 17.2% (466 choices)
Rottingdean 20.8% (564 choices)

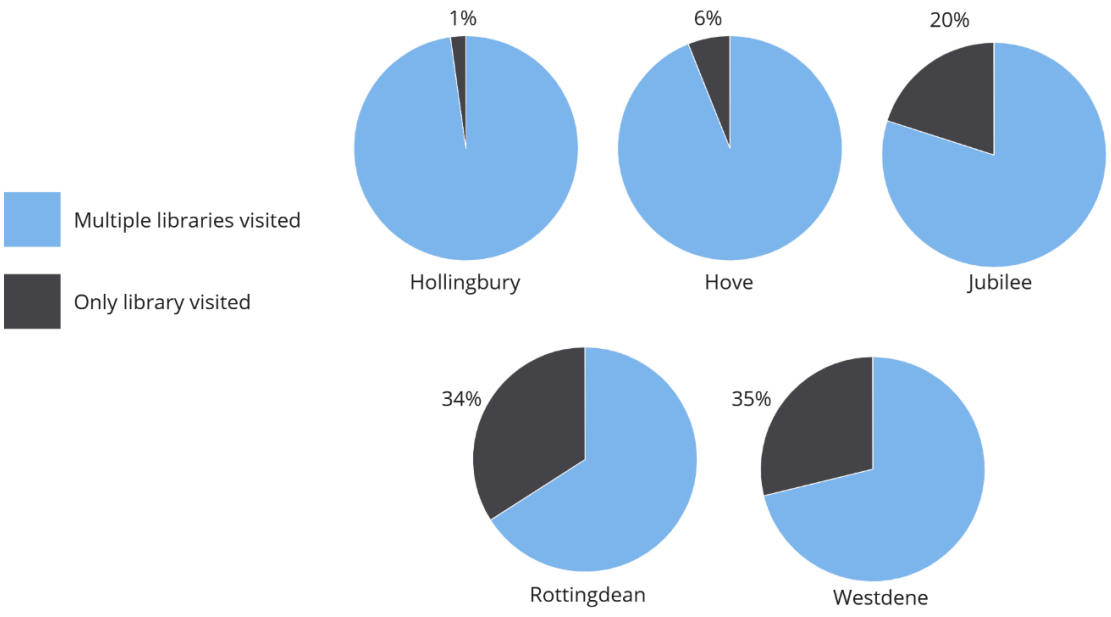


'Other' locations and services can be categorised as follows:

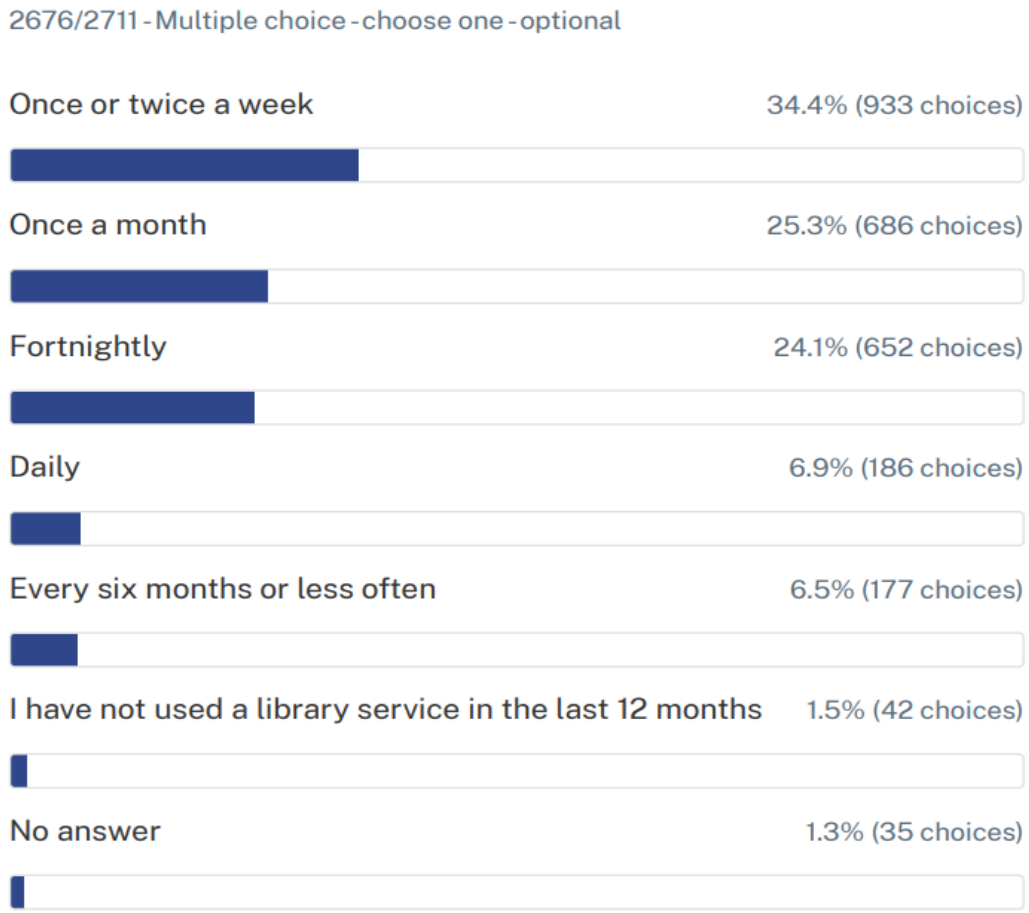
- Repeats of libraries already listed and chosen
- Other locations such as 'Rottingdean Gallery' and 'The Grange'
- Libraries outside of the authority (elsewhere in South East and UK)
- 'Reserving books'
- Council Help Desks
- School libraries
- Libraries Extra
- Specific online services such as 'Borrowbox'

Single site use vs multiple site use in areas affected by the proposals

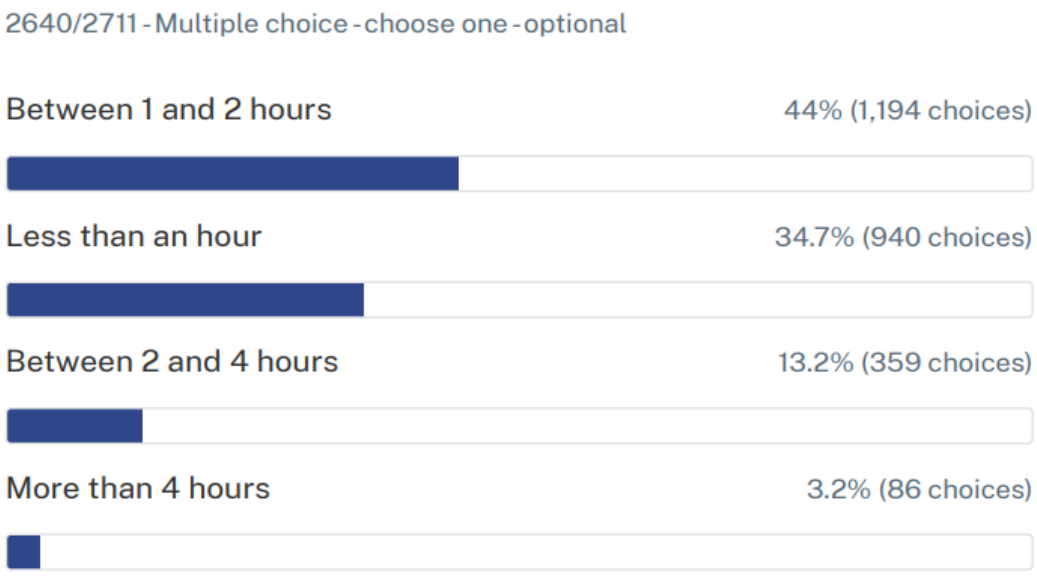
Among respondents who reported visiting the areas affected by the proposals, the proportion who had used only one specific library in the past year varied significantly between branches — from just 1% of Hollingbury users to 35% of Westdene users exclusively using that branch.

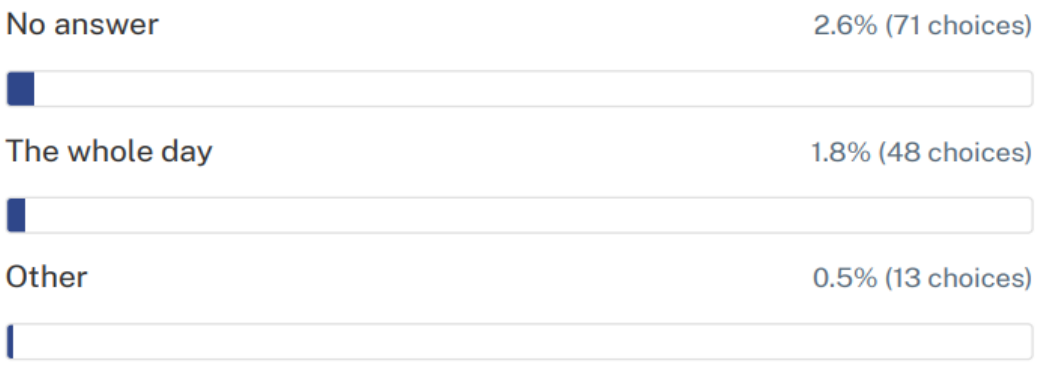


Q2. On average, how often do you use Brighton & Hove libraries? (optional)

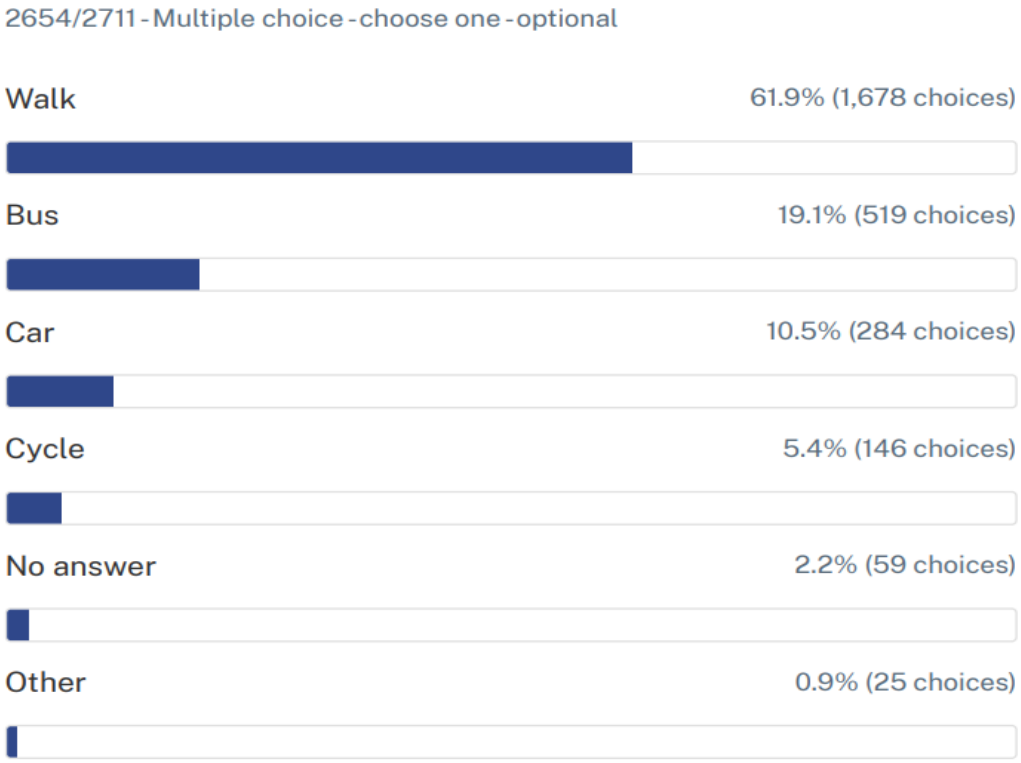


Q3. How long do you spend in Brighton & Hove libraries on an average visit? (optional)





Q4. How do you usually travel to the library you visit most in Brighton & Hove? (optional)

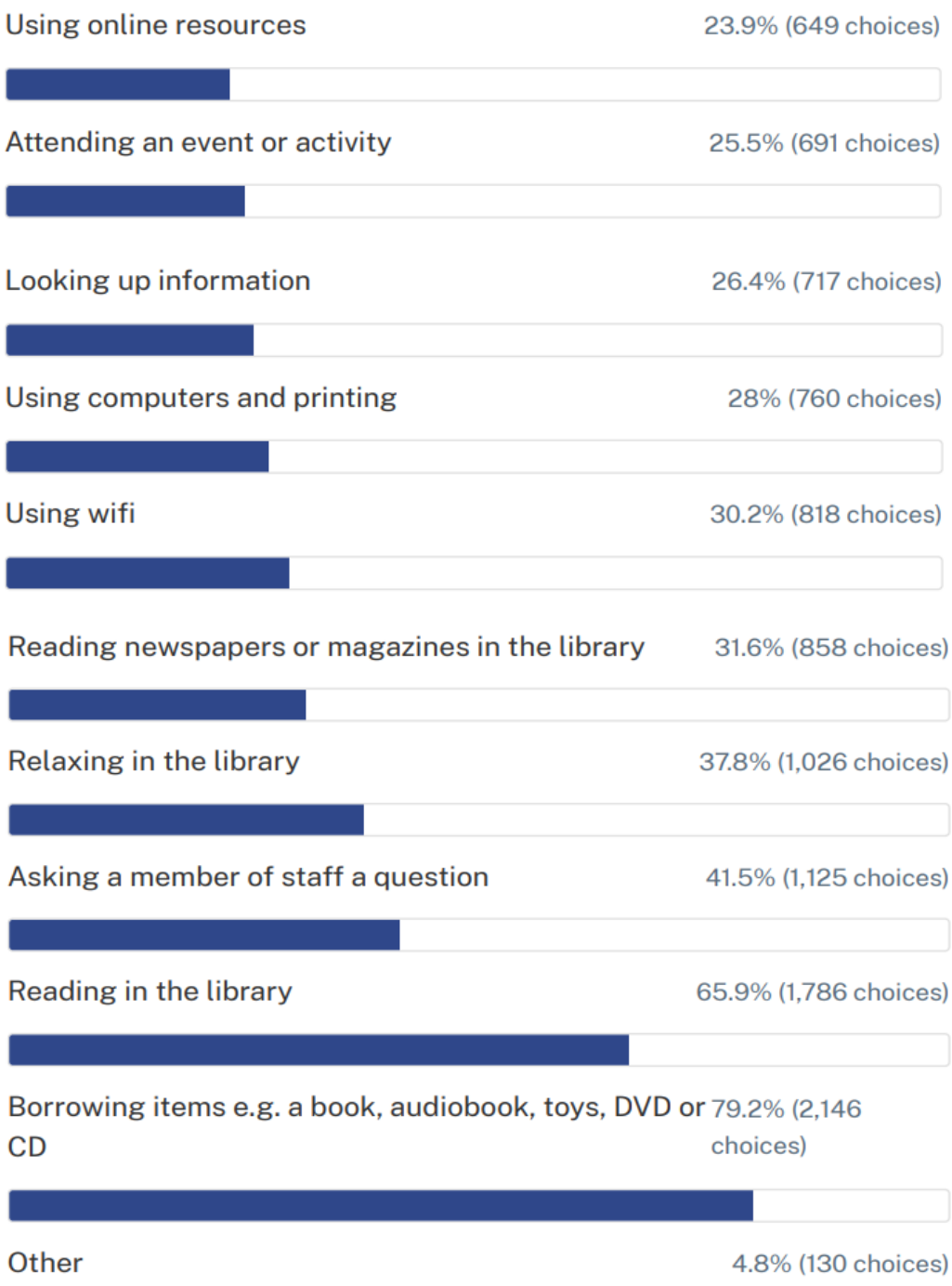


The majority of those who chose 'other' travel by train. A few respondents travel by wheelchair, mobility scooter or taxi. One respondent travels by broomstick.

Q5. Which of the following library services have you used in the last 12 months? (optional)

Respondents were given the option to tick as many services as they liked, as well as the chance to specify other service aspects not listed.





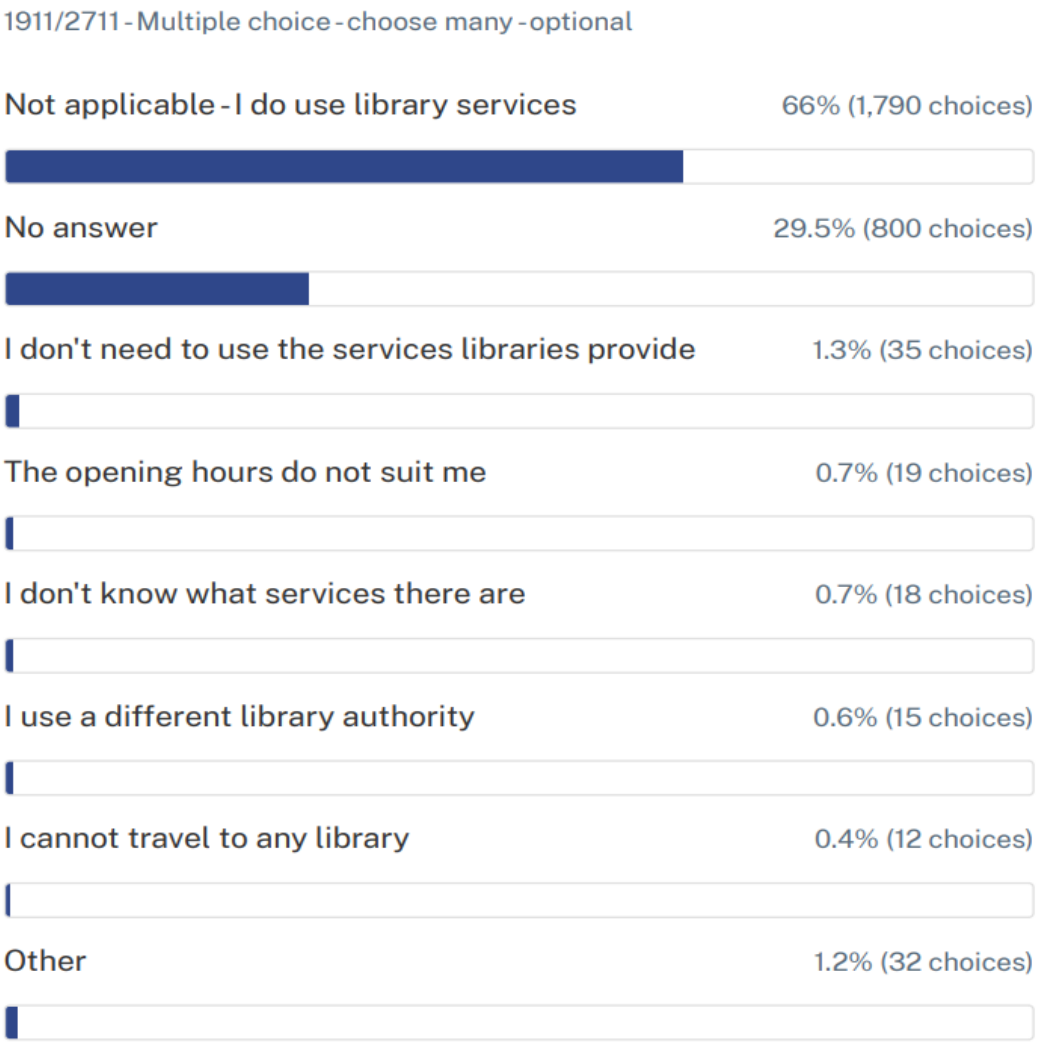
The answers of respondents who chose 'other' can be categorised as follows (in order from most to least cited):

- Baby changing
- Playing with and reading to children
- Using the toilet
- Using the cafe (Jubilee)

- Meeting with a Library Connect volunteer (computer support)
- Revising
- Breastfeeding
- Sheltering from bad weather
- Attending social groups and events
- Paid employment in a library

Q6. Why do you not use library services? (optional)

If respondents said that they did not use library services in the last year, we wanted to know more about why. Respondents could tick all that applied or specify another reason.

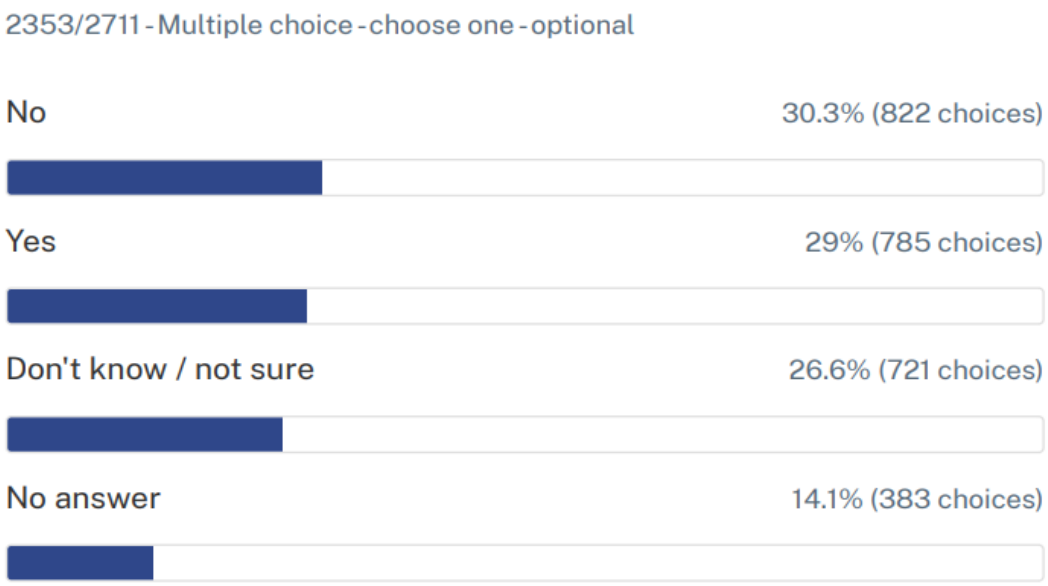


32 respondents shared detailed qualitative information about their reasons for not visiting libraries, categorised as follows (in order from most to least cited):

- Being too busy / no time to read
- Haven't used since children were younger
- Transport/travel issues
- Technical issues with cards (Libraries Extra)
- Insufficient lighting in buildings
- Ideological disagreement with some of the stock on offer
- Not permitted to bring pet into libraries
- Out of the 'habit'
- Live outside of the area

Q7. Can you access those or other alternative libraries? (optional)

Respondents were given a list of nearest alternative libraries to those proposed for closure before answering this question.



Q8. If you can't access alternative libraries or if you have concerns about accessing alternative libraries, please tell us why. (optional)

This free text question was answered by 38% of respondents.

The most cited concerns relating to access were for those living with disabilities and for families for whom the library is on their route home from school.

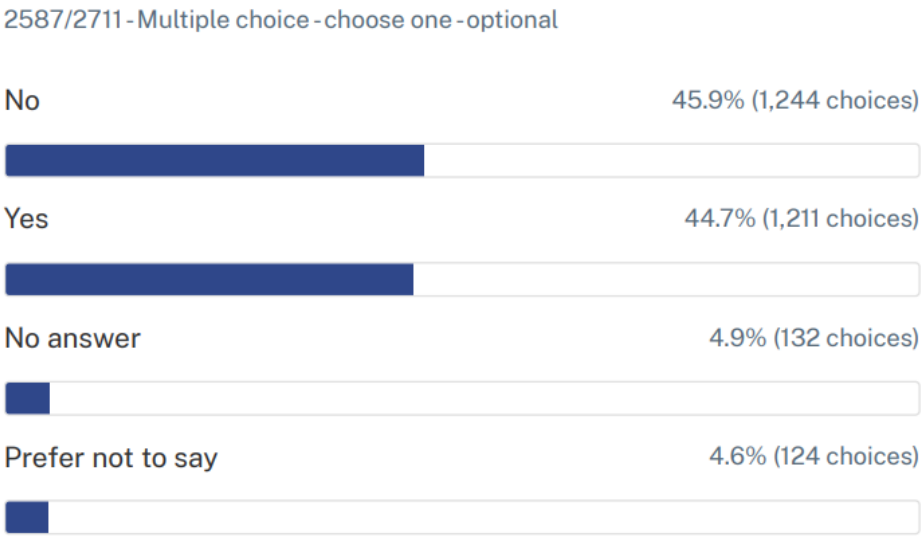
Concerns were also expressed about financial constraints and public transport costs, as well as the inconvenience of traveling longer distances to reach another library.

Respondents living with a disability said they would find accessing alternative libraries via public transport very challenging. Some of those who state they could make the journey by public transport fed back that their disability would mean they were unable to carry books home on the bus. Some highlighted the fact that their library offers the only accessible public toilet in their area. While some would consider driving to the next available library, parking is cited as a barrier to this (the example of limited spaces in the on-site car park at Patcham being given by multiple respondents).

Parents with young children highlight the difficulty of traveling to alternative libraries, especially when they rely on walking or public transport. They mention that using a car daily is not feasible due to climate change concerns and financial constraints. The comments also stress the importance of libraries being within walking distance, as they are often used for after-school visits and are integral to the daily routines of families.

Many comments moved beyond the scope of the question on access, to reflect a deep and broad concern about the potential closure of local libraries, emphasizing their importance as vital community resources.

Q9. Do you use Libraries Extra at any libraries? (optional)



Q10. If you don't use Libraries Extra, please tell us why. (optional)

This free text question was answered by 25% of respondents.

The trend in responses is that most people do not use Libraries Extra because they are unaware of it. Many also said they had heard of it but were not sure what it was or how to sign up for it.

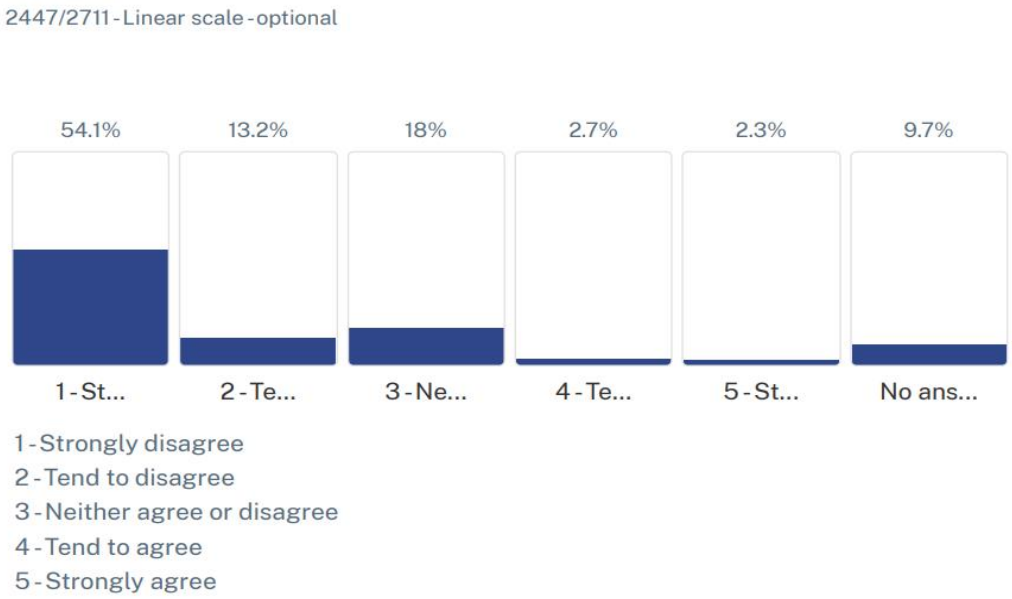
A significant number of respondents stated they do not need to use Libraries Extra because their needs are met during regular staffed hours or at libraries (Jubilee or Hove were both cited here) that have good opening times. Some haven't needed to use it yet or haven't got around to registering. A small number cited technical issues as a barrier to using Libraries Extra. Another common theme is that Libraries Extra is not available at the libraries respondents use most often (namely, Jubilee and Hove).

Safety and comfort concerns about being in an unstaffed library were raised by several respondents and were more likely to be raised amongst older respondents or those living with a disability.

Older respondents were more likely to report that they prefer to visit the library on staffed days. As well as citing safety as a reason for this, they also cite concern for the impact on staff employment and the loss of the social/community aspect of libraries.

Those respondents who do use Libraries Extra express that they find it useful but even among respondents who are users, there is still a preference for staffed hours. Technical issues are cited by some as being off-putting.

Q11. How much do you agree or disagree with the proposal to close Hollingbury Library?



Q12. If Hollingbury Library was to close, do you have any comments or suggestions for alternative ways to deliver local library services? We welcome comments from community groups interested in working with us to deliver local library services. (optional)

This free text question was answered by 17% of respondents.

Most respondents highlight their strong opposition to the proposed closure of Hollingbury Library, emphasising its vital role as a community hub, especially for children and low-income families. Some respondents cite that they and their families would have no other way to access books if the library closed, due to the expense of bus travel to alternatives and the terrain between them making walking with children challenging.

Summary of suggestions for alternatives to closure shared during the consultation:

- Reinstating a mobile library service to serve those unable to travel to other branches

- Using volunteers or community groups to staff or help run the library, sometimes alongside paid staff

- Expanding Libraries Extra or open access hours but ensuring self-service facilities work

- Partnering with local businesses, schools, cafes, or other community venues to host book collections within them

- Offering the Home Delivery Service for those unable to travel

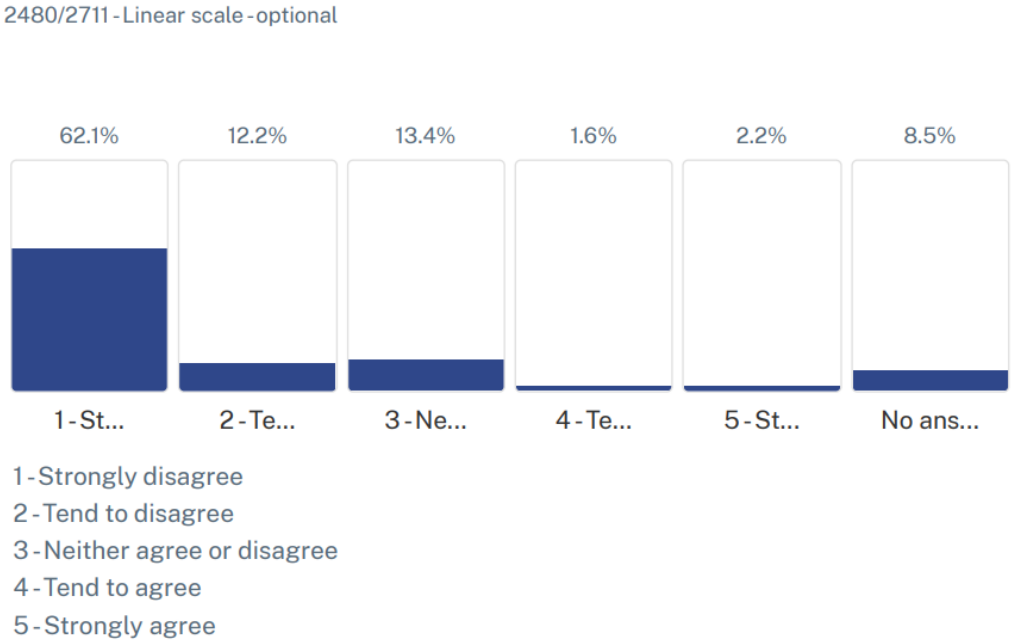
- Better promotion and marketing of the library

- Seeking alternative funding sources such as sponsorships or grants

- Reducing opening hours at larger libraries or cutting other council services instead

- Working with bus company to improve transport links between Hollingbury and Patcham

Q13. How much do you agree or disagree with the proposal to close Rottingdean Library? (optional)



Q14. If Rottingdean Library was to close, do you have any comments or suggestions for alternative ways to deliver local library services? We welcome comments from community groups interested in working with us to deliver local library services. (optional)

This free text question was answered by 19% of respondents.

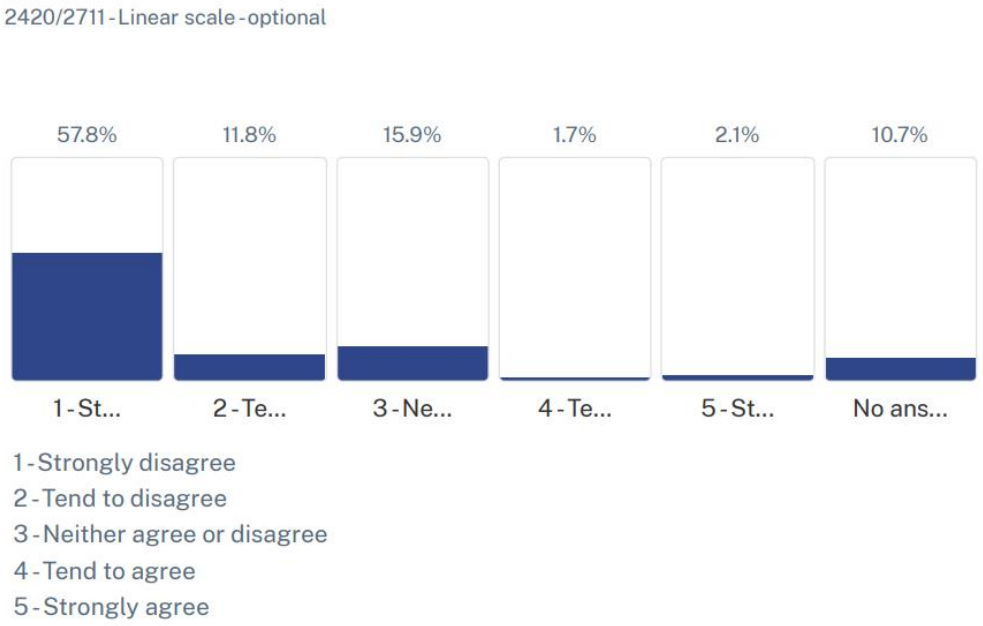
The overwhelming majority of respondents strongly oppose the closure of Rottingdean Library. Many highlighted the library's importance for education, literacy, social connection, and as a safe, free public space. There is widespread concern that closure would disproportionately impact those unable to travel to alternatives, such as the elderly, disabled, and families with young children. A few respondents mention using Saltdean Library as a viable alternative, but many state it is not easily accessible for Rottingdean residents.

Suggestions for alternatives to closure:

- Use volunteers or seek support from groups such as Rottingdean Heritage to run the library (though some respondents recognise this is not a substitute for professional library staff)
- Reducing staffed hours and increasing Libraries Extra hours at Rottingdean Library

- Reducing staffed hours across other/all community libraries to avoid closure of Rottingdean Library
- Offering mobile library services or home delivery for those unable to travel
- Reconsider spending priorities and look for savings elsewhere rather than closing libraries
- Charge for entrance to libraries in the way museums do

Q15. How much do you agree or disagree with the proposal to close Westdene Library? (optional)



Q16. If Westdene Library was to close, do you have any comments or suggestions for alternative ways to deliver local library services? We welcome comments from community groups interested in working with us to deliver local library services. (optional)

This free text question was answered by 17% of respondents.

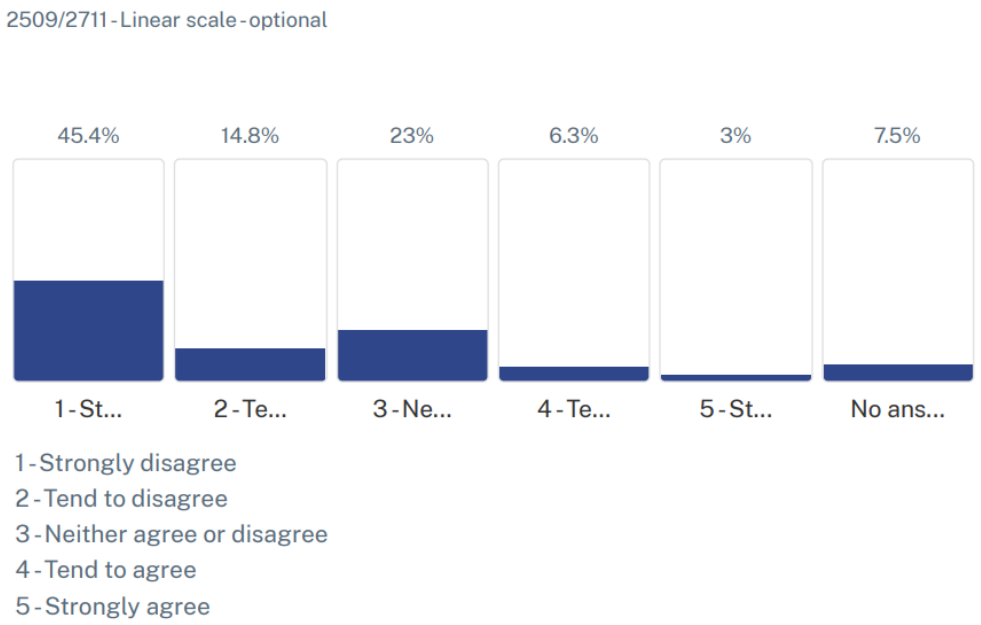
Most respondents to this question strongly oppose the closure of Westdene Library, emphasizing its role as a community hub, particularly for children at the neighbouring school, the elderly, disabled people, and those without easy access to transport. Many respondents stated that Patcham Library is not a viable alternative due to distance and poor transport links. A minority felt the library was underused and suggested focusing resources elsewhere, but these views were far outweighed by those stressing the library's value.

Suggestions for alternatives to closure:

- Reducing hours at larger libraries (such as Jubilee) or cutting other council spending instead
- Using volunteers or community groups to staff or run the library
- Increase Libraries Extra hours
- Partnering with the school or local organisations (local churches, school and leisure centre all mentioned) to share responsibility for the space and service
- Reintroducing mobile library services for those unable to travel
- Fundraising
- Increasing council tax or parking charges to support libraries
- Reduce spending on books to keep the building open

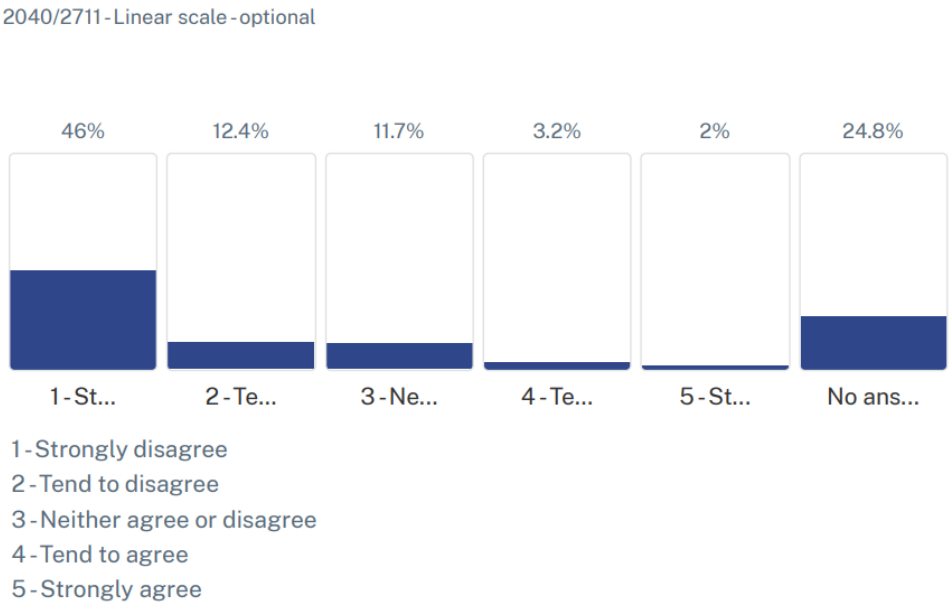
Q17. How much do you agree or disagree with the proposal to reduce the opening hours at Hove Library on a Wednesday evening? (optional)

Respondents were reminded of the precise proposed changes to hours before answering this question.



Q18. How much do you agree or disagree with the proposal to reduce the opening hours at Hove Library on a Saturday afternoon? (optional)

Respondents were reminded of the precise proposed changes to hours before answering this question.



Q19. If the opening hours at Hove Library were to change, do you have any comments or suggestions for alternative ways to deliver library services? (optional)

This free text question was answered by 21% of respondents.

There is strong opposition to reducing Hove Library's opening hours, with many respondents stressing that current late openings and weekend hours are essential for people who work full-time, parents, students, and families. Many said that closing at 5pm or earlier would make the library inaccessible to anyone working standard hours, and that Saturday afternoons are prime time for families. Several noted that school-age children and students would also be disadvantaged if weekend or late hours were cut. A minority of respondents accepted reduced hours as preferable to full closure.

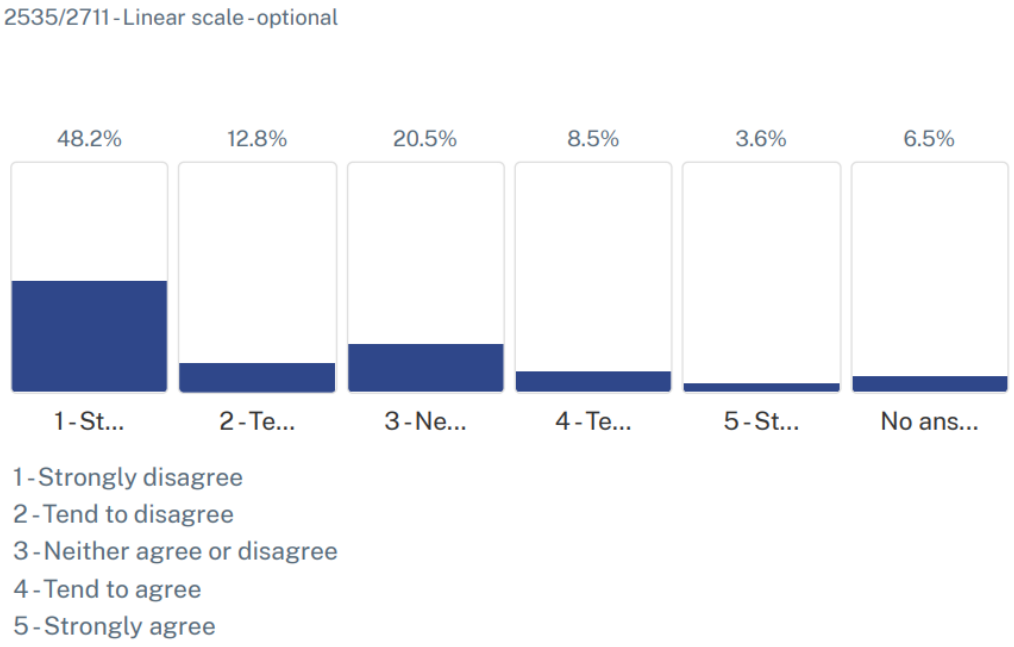
Suggestions for alternatives to a reduction in opening hours:

- Introduce Libraries Extra to Hove Library to reduce staffed hours
- Using volunteers to keep the library open

- Reduce hours on less busy weekdays rather than evenings or weekends
- Later opening in the morning to allow for later closing
- Alternative funding sources and fundraising efforts
- Increased use of volunteers and community partnerships to deliver library services
- Expand online library offer and resources
- Reintroducing a mobile library

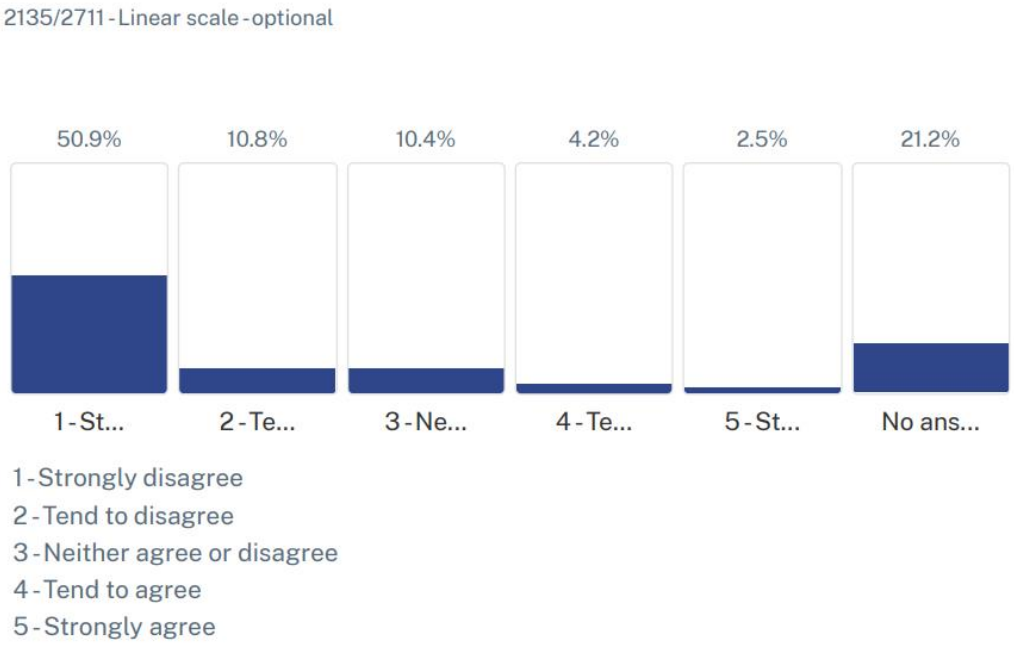
Q20. How much do you agree or disagree with the proposal to reduce the opening hours at Jubilee Library on a Monday evening? (optional)

Respondents were reminded of the precise proposed changes to hours before answering this question.



Q21. How much do you agree or disagree with the proposal to reduce the opening hours at Jubilee Library on a Sunday afternoon? (optional)

Respondents were reminded of the precise proposed changes to hours before answering this question.



Q22. If the opening hours at Jubilee Library were to change, do you have any comments or suggestions for alternative ways to deliver library services? (optional)

This free text question was answered by 22% of respondents.

Many respondents strongly disagree with the proposal to reduce Jubilee Library's opening hours. Many feel that the library is always busy at these times and serves as a vital, free, safe public space and community hub for all ages, including children, students, disabled people, and those facing social isolation or financial hardship. There is particular emphasis on the importance of Sunday afternoons for families, and the importance of weekday evenings for students and those seeking a warm, safe and free space. A minority accept that some reduction in hours may be necessary for financial reasons but urge that cuts be made at less busy times or that reductions be minimal.

Suggestions for alternatives to a reduction in opening hours:

- Introduce Libraries Extra to Jubilee to reduce staff costs

- Use volunteers to help keep the library open longer

- Close some floors at Jubilee on certain days and times and minimise staffing at those times, to avoid reducing hours

- Collaborate with local businesses or community groups to run library services

- Close earlier on a weekday rather than Sundays or only reduce hours outside of exam periods

- Prioritise funding for libraries over other services

- Alternative funding models such as crowdfunding or taxing the wealthy

Q23. How might these changes impact you? (optional)

We want to understand how our proposals may impact different people in our city, especially in relation to personal characteristics. These characteristics were listed as follows, as a precursor to this free text question:

- Age
- Disability
- Sex (including pregnancy and maternity)
- Gender identity or reassignment
- Race or ethnicity
- Religion or belief (including lack of belief)
- Sexual orientation
- Marriage or civil partnership
- Caring responsibilities
- Low income or digital exclusion
- Refugee, asylum seeker, or migrant status

Respondents overwhelmingly emphasised that libraries are vital community resources, especially for groups at risk of exclusion: children and families (particularly those on low incomes), older people, disabled people, those with caring responsibilities, and people experiencing digital exclusion. Many highlighted that libraries are often the only free, safe, warm indoor spaces available for social interaction, study, work, and access to information and technology.

A major concern was that reducing opening hours - especially evenings and weekends - or closing local branches would disproportionately impact those who cannot travel far or afford alternative spaces. This includes working people who rely on evening/weekend access, parents with young children who need local, accessible activities, and those with mobility issues or disabilities. Many noted that public transport is expensive or impractical for these groups.

Digital exclusion was frequently mentioned and the fact that libraries provide essential internet and computer access for those who cannot afford it at home, which is crucial for job-seeking, benefits, homework and administrative tasks. Respondents also stressed the importance of libraries in improving mental health and combating loneliness and isolation, particularly for elderly people and new parents.

Many parents and carers described libraries as essential for children's literacy and development, offering access to books they could not otherwise afford and providingeducational activities. School links were highlighted as important, and libraries located in close proximity to schools are especially valued.

Disabled people and neurodivergent users repeatedly stressed the need for accessible, local, quiet spaces; respondents express concern that closures or reduced hours would increase barriers and distress. Some respondents noted the lack of alternative accessible toilets in the city outside of those provided by local libraries.

Libraries were also described as safe havens for LGBTQ+ people, migrants, and other minorities - places where they feel welcome and can access relevant resources. Several respondents mentioned the importance of libraries as neutral spaces for community cohesion and integration.

A number of respondents expressed concern that closures or reduced hours would further erode community spirit and increase inequality. Some suggested alternatives such as using volunteers to keep libraries open but raised concerns about consistency and inclusivity in volunteer-run services.

A minority said they would not be personally affected but recognised the negative impact on others, especially vulnerable groups. A few expressed a view that the consultation was poorly designed or that decisions had already been made.

Q24. Please share any final comments or suggestions you have about our proposals. (optional)

This free text question was answered by 45% of respondents.

Respondents overwhelmingly oppose library closures and reductions in opening hours, describing libraries as vital, irreplaceable community assets that provide much more than just access to books. The most common themes and concerns in response to this question are:

Libraries as essential community hubs

Libraries are repeatedly described as safe, warm, and inclusive spaces that support learning, social connection, mental wellbeing, and provide free access to information and technology for all ages, especially children, the elderly, low-income families, and vulnerable groups.

Negative impact on disadvantaged groups

There is strong concern that closures, or reduced hours will disproportionately harm those who cannot easily travel further afield, such as people with disabilities, older people, families with young children, and those on low incomes.

Importance of libraries for children's education and literacy

Many stress the crucial role libraries play in encouraging children to read, supporting schoolwork, and providing educational opportunities that may not be available at home.

Rottingdean and Westdene Libraries

There is a particularly strong response to keep Rottingdean and Westdene libraries open. Respondents highlight their high usage (especially by children and older people), their role as community/cultural hubs (Rottingdean Library's position within The Grange), proximity to schools, and the minimal financial savings compared to the social cost. Many argue that closing these libraries would increase isolation and reduce access for those unable to travel.

Concerns about reduced opening hours at central libraries

There was also a particularly strong response to retain late nights and weekends at Jubilee and Hove Libraries. Many object to reducing evening and weekend hours at main libraries (Jubilee and Hove), noting these are peak times for working people, students, and families. There is particular concern about Sunday closures or early closing.

Opposition to cost-cutting

Many respondents believe the proposed savings are small compared to the long-term social and educational costs. They urge the council to find savings elsewhere.

Libraries as free public spaces

Libraries are seen as one of the last remaining places where people can spend time without having to spend money or face commercial pressures.

Respondents suggest a range of alternatives to closure or cuts, the most cited being:

- Increase use of volunteers or community-run models (though with some caution about sustainability)

- Seek alternative funding (sponsorship, donations, crowdfunding, tourist tax)

- Reduce hours at larger libraries to maintain smaller branches

- Expand library services (increased digital offer and mobile libraries most frequently mentioned)

- Improve publicity and outreach to increase usage

Other notable points:

- Some call for greater transparency in decision-making

- A minority of respondents do suggest rationalising the service by focusing on fewer but better-resourced libraries

In summary, the vast majority of respondents see libraries as vital public spaces whose closure or reduction would have far-reaching negative impacts, and they urge the council to seek alternative savings or funding and to recognise the long-term value of libraries over short-term financial savings.

We invited survey responders to complete optional equalities monitoring questions at the end of the survey. A summary of the responses are provided at the end of this report.

Email Responses

We received a total of 164 emails to the dedicated consultation inbox. Engagement came from a range of people, summarised as follows:

Response type	Count
Public	133
Community Group	7
School	2

MP	1
Organisations	3
Councillors	2
Library Staff	2
Access Requests	14
Total	**164**

As well as this, 195 pages of letters and handmade posters from children at Westdene Primary School were written, scanned and shared by email to the consultation inbox as an attachment. In addition, 7 handmade posters were shared in-person by children from Rottingdean which were scanned by library staff and sent to the consultation inbox.

14 access requests were predominantly for PDF versions of the survey or for signposting to proposal details and appendices.

The majority of email responses from the public specifically relate to Rottingdean and Westdene Libraries, whereas group and organisational responses tended to be more general in nature.

The most common themes and concerns from email correspondence, echoing some of those from the survey responses, are:

Potential impact on families, children and young people

Respondents highlight that for many children, the library is on their way home from school or close to a swimming lesson, and concern is expressed that families may be unable to maintain this healthy library habit. The two responses from local schools in Westdene and Rottingdean both state the importance of their local public libraries' impact on improving and maintaining literacy outcomes for pupils. Westdene Primary School's response highlights the fact that all of their classes visit the library every fortnight but do not use the main entrance. Pupils that responded directly to the consultation by written letter are overwhelmingly against the proposed closure of Westdene Library and share the many ways the library supports their love of reading. They also outline the role it plays in the lives of other people in their community – particularly those experiencing fuel poverty and digital exclusion. They also reference the calming and relaxing nature of the space.

Similarly, concern is expressed by members of the public for families who utilise Jubilee and Hove libraries at weekends who would find this opportunity reduced were the proposals to be taken forward.

Potential impact on older people, specifically those digitally excluded

Multiple respondents highlight that older people are vulnerable to digital exclusion and social isolation, regardless of their financial means. As well as this, older respondents share their personal experience of living with disabilities, and their inability to use public transport.

Libraries as vital safe spaces

Many examples of the benefits of physical library spaces for vulnerable groups are shared, particularly young people, refugees and asylum seekers, and the unhoused community at Jubilee and Hove Libraries.

Dissatisfaction with consultation process

A number of respondents expressed their concern over the lack of multiple suggestions being consulted on, as well as the size of the potential saving compared to the potential impact on communities and the financial savings that libraries contribute to elsewhere (school attainment, employment, reducing social isolation and digital exclusion are all cited in relation to this).

Event Engagement

Over 370 people were recorded as being in attendance at nine consultation events to share their views in person.

Key themes and concerns

Transparency & Evidence

Requests for detailed cost breakdowns and clarity on how decisions are made were made at multiple meetings and concerns expressed about long-term planning.

Accessibility & Equity

Strong objections were made across the board to reduced hours or closures. Concerns about impact on children, elderly, and disabled residents were cited in all locations.

Carbon Impact

Questions were put to Councillors and Officers at multiple meetings about increased travel and emissions if residents at Rottingdean, Hollingbury and Westdene must travel further to access libraries.

Social Value

Libraries were frequently described as safe, free spaces for children and families. Personal stories highlighted the role of libraries in post-COVID recovery, job seeking, and community connection or combatting of social isolation. Libraries were seen by attendees as essential to fund, and it was suggested that they mitigate excessive screen time for children and young people. Particularly in Rottingdean and Westdene, event attendees highlighted a lack of other free community spaces.

Ideas from event attendees

Alternative models

Shared funding, reduced staffing hours, fully volunteer-led models, or blended (staff and volunteer) models were all suggested as alternatives to closures or reductions.

Income generation

Encouraging more public donations, seeking sponsorships, and running income-generating community events were frequently suggested. Collaboration with businesses (including national bookshops) was also suggested as an area for exploration.

Youth engagement

There were strong calls to consult thoroughly with young people, especially students from local schools. Suggestions to involve students in running libraries services via Duke of Edinburgh volunteering were made.

Partnerships

Career coaching, adult education, and digital support were suggested areas to work in partnership with other services and save resources. Greater collaboration with school libraries was also proposed.

Smartphone Use & Education

Libraries are seen as a counterbalance to screen time; calls to align library policy with national moves to reduce smartphone use among children and the National Year of Reading in 2026.

Rottingdean & Westdene-Specific Issues

- Cultural Hub: The Grange houses the library, gallery, museum, and gardens; it is seen as a vital cultural centre.
- Community Impact: Residents from Rottingdean, Ovingdean, and Westdene expressed concern about losing key social and educational resources.

- Accessibility: Praised for disabled access and proximity to schools and play areas.
- Heritage & Covenant: Questions raised about historical agreements requiring the building to be used for library services.
- Synergy with Other Services: Highlighted the interconnectedness of services at The Grange and Westdene School.

Summary of all responses

Most frequently cited ideas and suggestions from all responses

Reduce savings targets for libraries and reallocate to other council services
Increase use of volunteers or community-run models
Seek alternative funding (sponsorships, donations, crowdfunding, charging and membership)
Reduce or alter hours at larger libraries to maintain smaller branches and protect evenings and weekends
Expand or alter library services (digital support and e-resources, mobile libraries, extend Libraries Extra hours at community libraries and consider introducing at Jubilee and Hove)
Improve publicity and outreach to increase usage

Key themes and concerns from all responses

Opposition to reduction in library budgets
Concerns over impact on children and literacy, and schools' use of libraries
Loss of study space for young people and students
Libraries as safe, warm, 'third' spaces that support community cohesion and reduce social isolation
Difficulty travelling to alternatives, particularly for families, elderly and disabled
Digital and financial exclusion

How this report will be used

This report is created to facilitate discussion at a November 2025 meeting of the People Overview and Scrutiny Committee in Brighton & Hove.

This report plus further analysis of the public consultation will be shared as part of the final proposal paper going to Cabinet in December 2025.

Supplementary information: Your Voice Survey Monitoring Information

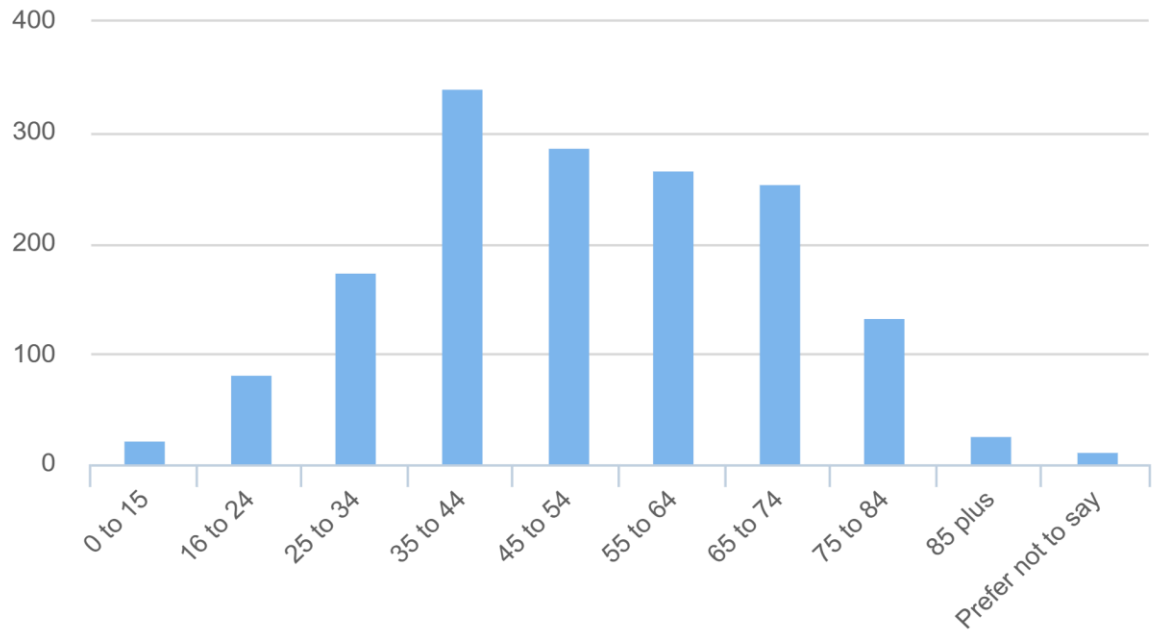
A series of optional equalities monitoring questions were asked at the end of the survey. Before these questions, it was stated that:

- *All responses are anonymous.*
- *Data is used to help the council fulfil its legal equalities duties and ensure its services meet the needs of customers and service users*
- *The information you give will be used to see what impact these proposals may have on particular groups. We can also adjust our approach if we find a particular group is under-represented.*

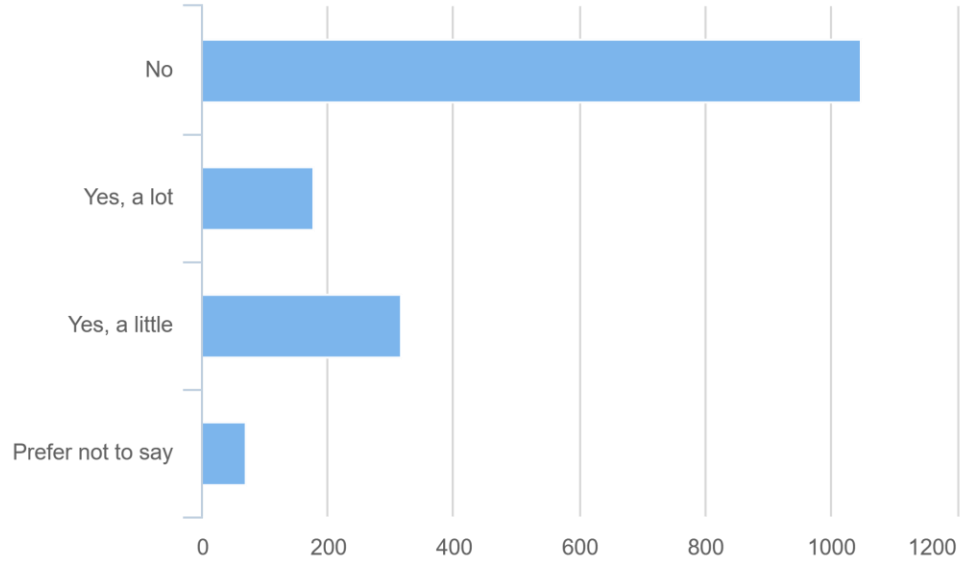
59% of respondents shared monitoring information.

Here is a summary of those responses:

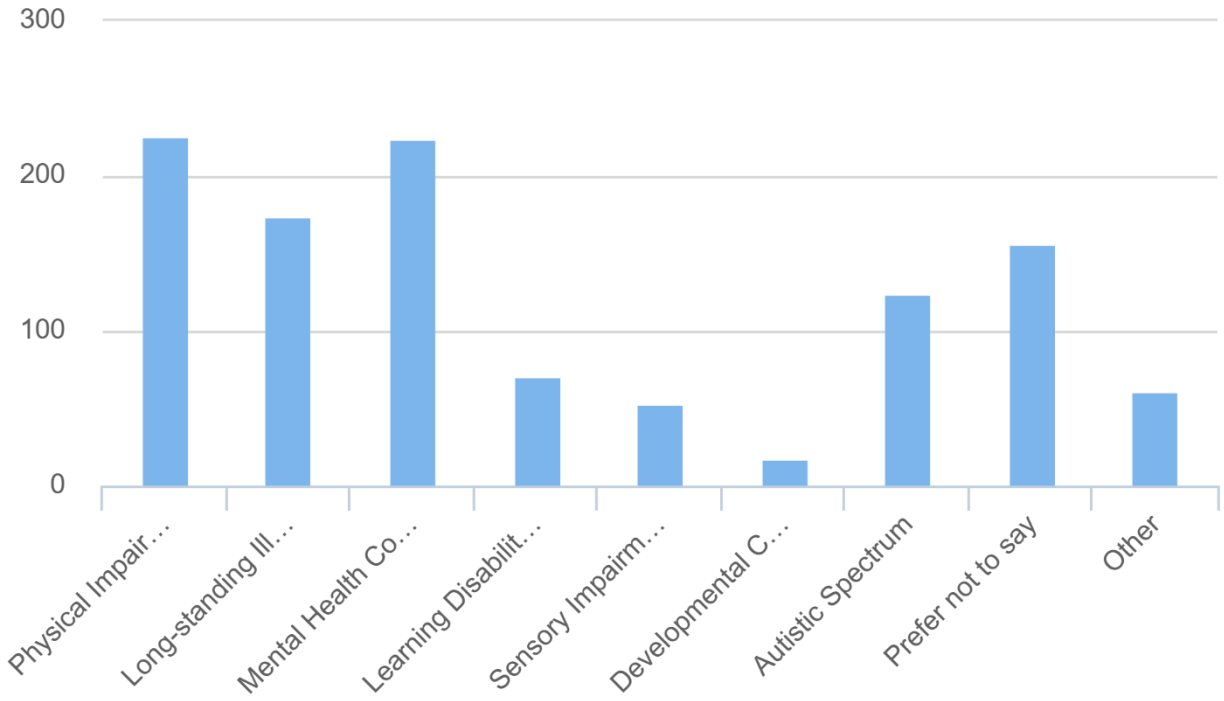
Q32. What is your age? (optional)



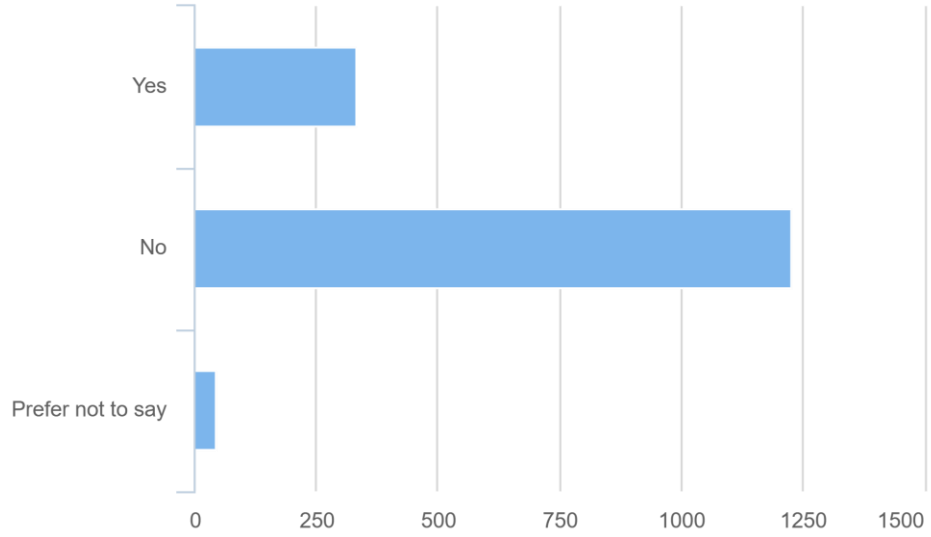
Q 33. Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months? (optional)



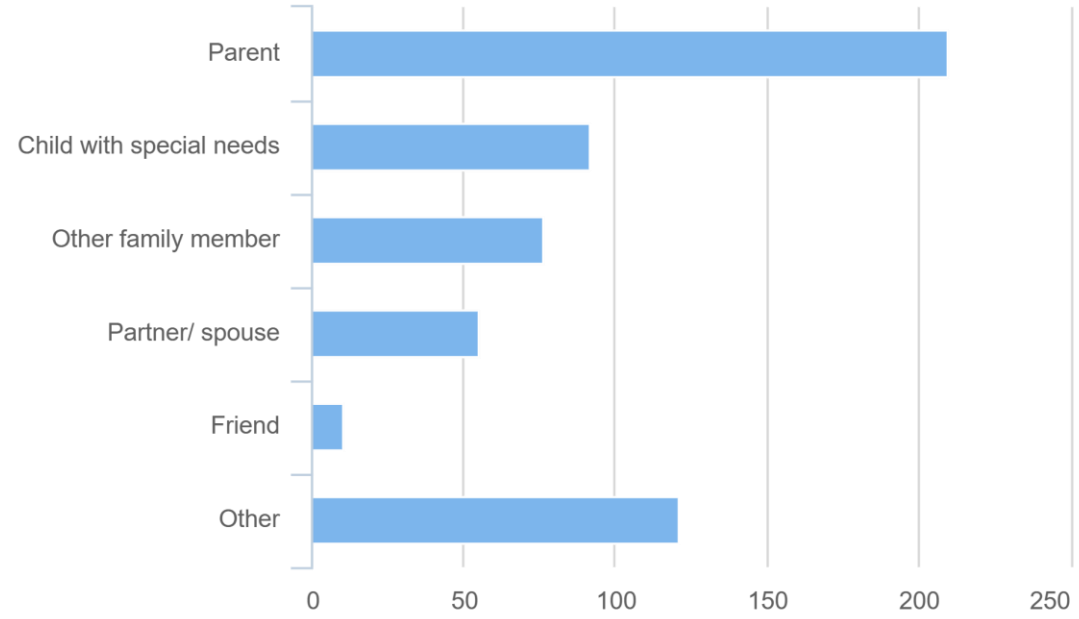
Q34. Do any of your conditions or illnesses reduce your ability to carry out day-to-day activities? (optional)



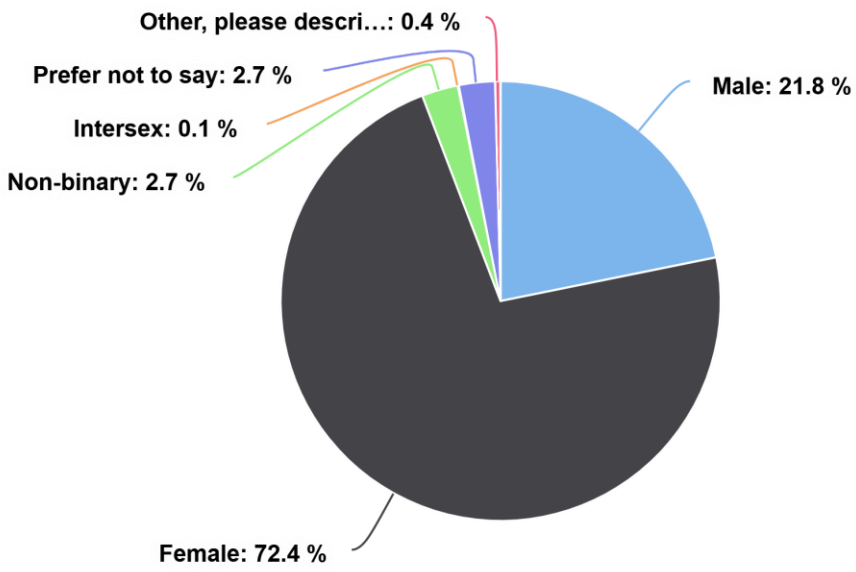
Q35. Are you a carer? (optional)



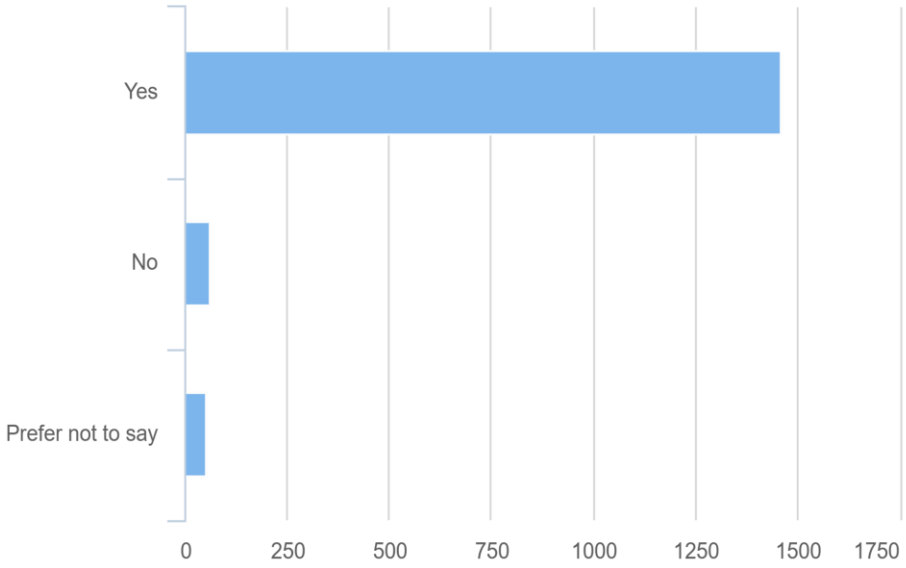
Q36. If you answered 'yes' above, please state who you care for. If you care for more than one person please tick all that apply. If none apply, please mark 'other' (optional)



Q39. What best describes your sex?



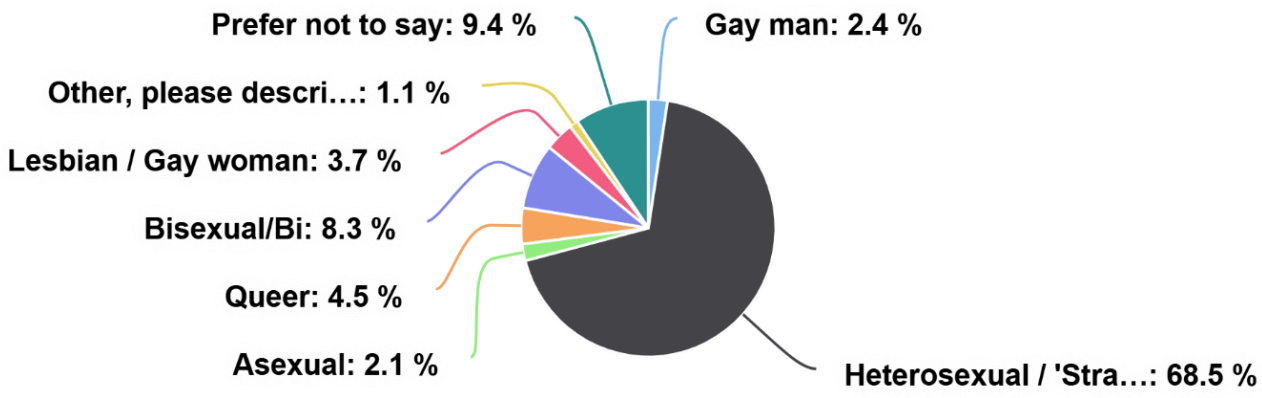
Q40. Is the gender you identify with the same as your sex registered at birth? (optional)



Q42. How would you describe your ethnic origin? (optional)

Asian / Asian British: Bangladeshi	4
Asian / Asian British: Chinese	8
Asian / Asian British: Indian	33
Asian / Asian British: Other (please share details below)	12
Black / Black British: African	17
Black / Black British: Caribbean	14
Black / Black British: Other (please share details below)	2
Mixed: Any other mixed / multiple ethnic background	32
Mixed: Asian and White	17
Mixed: Black African and White	8
Mixed: Black Caribbean and White	9
Other ethnic group, please describe	29
Other Ethnic Group: Arab	12
Prefer not to say	42
White: English, Welsh, Scottish, Northern Irish, British	1099
White: Gypsy or Irish Traveller	2
White: Irish	32
White: Other	191
Asian / Asian British: Pakistani	2
(blank)	1146

Q44. Which of the following best describes your sexual orientation? (optional)



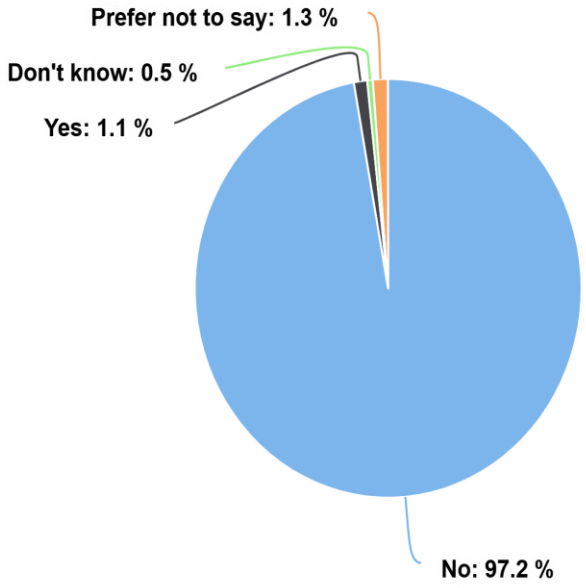
Q46. What is your religion or belief? (optional)

Jewish	24
I have no particular religion or belief	749
Prefer not to say	86
Other philosophical belief	53
Hindu	15
Christian	367
Other religion or belief, please describe	29
Atheist	115
Pagan	15
Buddhist	25
Agnostic	47
Muslim	19
Sikh	2

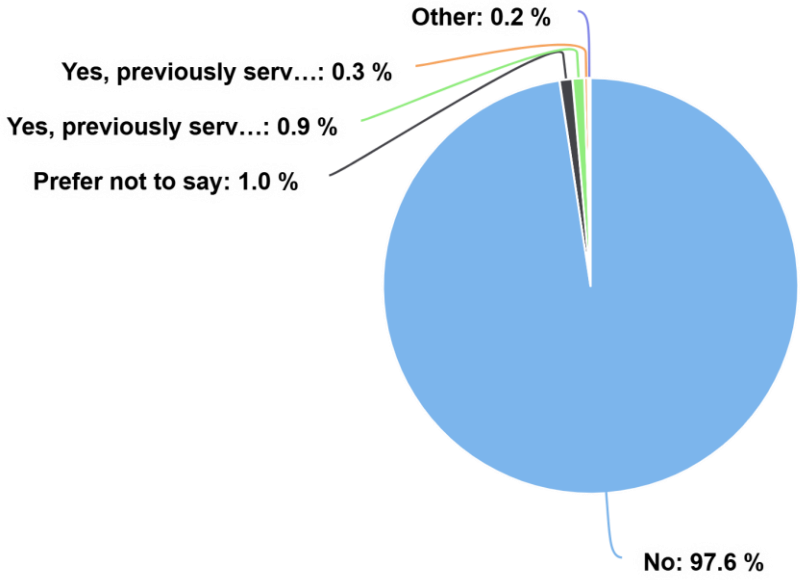
Q48. What is your legal marital or registered civil partnership status? (optional)

Never married and never registered in a civil partnership	455
Married	704
Separated but still legally married	19
Divorced	127
Widowed	71
In a registered civil partnership	43
Formerly in a civil partnership which is now legally dissolved	4
Separated but still legally in a civil partnership	4
A surviving member of a legally registered civil partnership	2

Q49. Are you, or have you been, looked after by a local authority for at least 13 weeks since the age of 14? (optional)



Q50. Have you previously served in the UK armed forces? (optional)



Brighton & Hove Libraries

Needs and Use Analysis

Part 1: Data Analysis

To be informed by Public Consultation - Summer 2025

Brighton & Hove City Council

Contents

1. Summary of Findings

2. Introduction

3. Current Library Use

4. Community Profiles

5. Opportunities

6. Recommendations

7. Next steps

1. Summary of Findings

Savings need to be identified across a range of Brighton & Hove City Council services for 2025-27. The 2025-26 budget includes proposals to reduce staff costs through a reduction in

opening hours at Jubilee and Hove Libraries and the proposed closure of up to 3 community libraries.

To support the development of these proposals for public consultation, senior library professionals have conducted a needs and usage analysis. Part 1, summarised here, focuses on available data and will be further informed by feedback gathered during the consultation process. A key consideration of this analysis has been how to minimise the impact of necessary service reductions—particularly identifying which library services should be protected from closure.

Rigorous analysis of current library data, combined with sociodemographic information at both a ward and a 'library catchment' level from a range of sources, were used to identify options that would have the least impact possible on the city as a whole, as well as a consideration of the impact on individual communities.

Jubilee & Hove – Footfall vs operating costs

At Jubilee, a reduction of two hours on a Monday evening (5-7pm) and three hours on a Sunday afternoon (2-5pm) would have the least impact in terms of footfall. Sunday mornings 11am-12pm at Jubilee being almost three times as busy on average as 4-5pm.

At Hove, where Wednesdays 6-7pm currently sees an average of 29 people, a reduction of two hours (5-7pm) would have the least impact in the week. Saturdays 10-11am are twice as busy on average as 4-5pm and so a reduction in hours in the afternoon (2-5pm) would have less impact on the library's footfall.

Community Libraries – Need and use vs operating costs

When reviewing the library usage and sociodemographic data, three factors stand out that should inform the decision-making process:

1. **Variation in geographical spread of libraries**
2. **Variation in operating costs and current use**
3. **Variation in needs relating to social outcomes from area to area**

Concentrating resources on fewer physical library locations will support longer-term sustainability of the wider city service, as well as safeguarding the quality of library provision.

Rottingdean & West Saltdean is one of the least deprived wards in the city and is home to two community libraries, with Saltdean and Rottingdean branches less than 2 miles apart and well connected by bus. Rottingdean has the highest building costs of all the community libraries and can expect ongoing high maintenance and management costs due to its heritage status.

Data shows that Westdene & Hove Park is the least deprived ward in the city. Westdene Library's footfall is consistently lower than other community branches, currently forming 0.8% of the service's total visits. The library is close to neighbouring Patcham Library and there are good public transport links and high car ownership levels in the area. Library data shows that those in the postcode sectors to the south of the ward already use neighbouring Hove and Hangleton branches.

Patcham & Hollingbury is another ward containing two libraries, with Patcham and Hollingbury (Old Boat Corner) branches less than 2 miles apart. Footfall is considerably higher at Patcham (and consistently so) and management costs associated with Hollingbury's site are much higher than average.

We recognise that communities are not consistent or homogonous and within community areas there will be differences in need. These factors are considered in more detail below.

2. Introduction

Local authorities UK-wide are facing a growing funding gap, with the Local Government Association (LGA) warning of an £8.4bn gap by 2028-29. Research from the County Council's Network (CCN) in January 2025 suggested that over one in three (35%) of county and unitary authorities are likely to reduce their number of branches and opening hours in 2025-26.

Savings need to be identified across a range of Brighton & Hove City Council services for 2025-27. The recently adopted 2025-26 budget includes proposals to reduce staff costs through a reduction in opening hours at Jubilee and Hove Libraries and the proposed closure of up to 3 community libraries.

The purpose of this document is to provide a thorough assessment of local needs and use, in order to support proposals for consultation and decision-making in relation to public library services provided in Brighton & Hove. Specifically, to present:

- Key demographic information to create a picture of existing and potential needs from library and information services
- An improved understanding of current library use

The findings will also be used to inform, in part, a new Libraries Strategy for 2026-2030.

Methodology

As outlined in the Charteris Report (2009)[1], and at the stipulation of the Department of Culture Media and Sport (DCMS), this process will include:

Consideration of the needs of those who live, work and study in the area

An assessment of accessibility

Consideration of the views of existing users

An assessment of whether any specific communities or groups would suffer adverse impacts

Consideration of information from partner organisations and other departments

The wider process, undertaken throughout 2025, is formed of four phases, designed with the above criteria at the fore:

Phase 1: Needs and Use Part 1 - Data Analysis - Spring 2025

Phase 2: Needs and Use Part 2 - Public & Stakeholder Consultation – Summer/Autumn 2025

Phase 3: Staff Consultation – Winter/Spring 2025/2026

Phase 4: Implementation of changes - Spring 2026

Part one of this needs and use phase consists predominantly of desk-based research and data analysis. Data reviewed includes footfall, borrowing data (about what resources are borrowed, when and where) from library management systems, 2021 Census data, ONS and DWP data available via the Local Insight platform[2], and additional data provided by colleagues from across the council, including numeric Schools Census, travel and Adult Social Care data.

When reviewing the need associated with the communities each library serves, it has been necessary to look at information on both a ward level (where this is the level at which data is collected) and what we refer to here as a 'library catchment' level. These catchment areas can be found on the local insight tool and are based on data from the library management system to ensure the highest accuracy possible when associating residents with different branches. The opportunities section towards the end of this document references other more granular geographical levels to capture nuances of the needs of some of our communities.

Part two of the needs and use analysis will comprise a formal Public Consultation as detailed in section six of this document, alongside stakeholder engagement events.

Brighton & Hove

Brighton & Hove had a population of approximately 277,100 as of the 2021 Census, reflecting a modest 1.4% increase since 2011. The median age was 38 years, an increase from 35 years

[1] A Local Inquiry into the Public Library Service Provided by Wirral Metropolitan Borough Council - GOV.UK

[2] www.brighton-hove.localinsight.org

in 2011, yet still younger than the South East average of 41 and England's 40. Notably, the number of residents aged 50 to 64 increased by 30% between 2011 and 2021, while those aged 35 to 49 decreased by 7.9% during the same period.

Brighton & Hove has become increasingly ethnically diverse. 26% of residents (approximately 72,272 people) identified as Black and racially minoritised in 2021, up from 19.5% in 2011. This proportion is higher than the South East average of 21% and aligns with the national average for England.

Administratively, the city is divided into 21 electoral wards, across which the needs of residents vary greatly.

A library service responsive to change

The city's public library service currently comprises 13 libraries (see Fig.1.), including the flagship Jubilee Library in central Brighton, Hove Library, and 11 community libraries located in Coldean, Hangleton, Hollingbury, Moulsecoomb, Patcham, Portslade, Rottingdean, Saltdean, Westdene, Whitehawk and Woodingdean. Jubilee Library, opened in 2005, stands out as one of the most visited libraries in the UK, recording over 830,000 visits in the 2023/24 period and accounting for about 50% of the city's library transactions.

Over the past decade or so, Brighton & Hove Libraries has undergone significant transformation to adapt to changing community need and financial constraints, as well as the Covid-19 pandemic. In 2013, the mobile library service was withdrawn and replaced by a more cost-effective Home Delivery Service that has maintained access for residents unable to visit library branches. Against a backdrop of national library cuts, the city retained all of its branches for the next decade, until Mile Oak Library was closed in July 2023 due to low visitor numbers and high buildings costs. In the same year, staffed days at community libraries were reduced and in 2024 the Libraries Management Team was also reduced, both in order to meet savings targets.

In the three years preceding this, the service responded quickly and effectively to the Covid-19 pandemic. Pivoting to a click and collect format of delivery and sharing online Storytimes and activities for children at home, whilst ensuring the safety of staff and customers as a priority.

Despite these challenges, Brighton & Hove Libraries has embraced innovation and inclusivity. The introduction of the 'Libraries Extra' initiative (at a time when libraries nationally were closing) has extended opening hours and improved access through a combination of staffed and unstaffed periods. In 2020, Jubilee Children’s Library was refurbished and still receives public acclaim today.

Furthermore, in 2024, all 13 libraries in the city were collectively awarded the 'Library Service of Sanctuary' status, recognising their commitment to providing welcoming spaces for refugees, asylum seekers, and other marginalized groups. In the same year, the newly refurbished Saltdean Library, based within Saltdean Lido, was opened. Part of a broader development of

the listed site, the majority funder of this project was the National Lottery Heritage Fund.

Fig.1. Library locations and ward boundaries



In May 2025, council customer services were integrated with libraries. Two new help desks opened at Jubilee and Hove, operating Monday – Friday 10am-5pm, which, along with the council's telephone switchboard, are now staffed by library staff. With the addition of free self-help telephones and PC use across all branches, libraries are enabling more face-to-face support to access council services for those who need it most.

This context underscores the evolving landscape of public library provision in Brighton & Hove, reflecting efforts to balance resource limitations with the goal of serving a diverse and growing urban population.

3. Current library use

Footfall

Brighton & Hove Libraries' 13 libraries attracted a total of 1,256,033 visitors in 2024-25 (see Fig.2). A comparison to 2019-20 (1,462,923) shows us that library footfall has gradually climbed and almost returned to pre-pandemic levels.

Jubilee and Hove, being the most central libraries, remain the busiest buildings. Of the remaining 11 community libraries, the newly refurbished Saltdean Library (based at Saltdean Lido) received over 40k visits in this timeframe. Hollingbury Library (based at Old Boat Corner Community Centre) received the least visits at 6.5k.

Analysis of the postcode sectors of active borrowers from 2023-25 shows that between 40-60% of each community branch's customers live in the building's immediate vicinity. The geographic reach of both Jubilee and Hove is broader, as expected with larger and more centrally located branches, serving the city centre's employees, students and visitors as well as city residents.

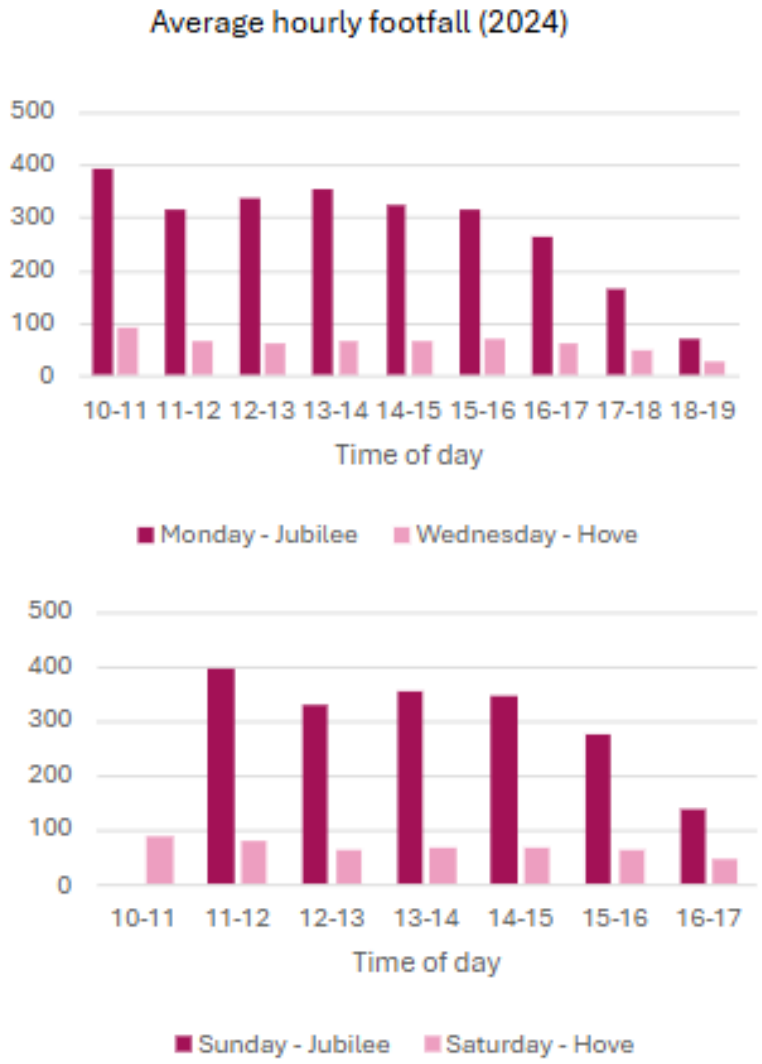
The percentage of visits that happen during unstaffed Libraries Extra periods ranges from 28% at Portslade Library to 66% at Westdene Library. Overall, this data is reflective of the fact that some community libraries have more staffed days than others and highlights the importance of the promotion of the Libraries Extra service (a free upgrade to regular library membership) to all users.

Fig.2. Visitor numbers 2024-25 by branch (ranked)

	All Days	LE days	LE %
Jubilee Library	857,109	N/A	N/A
Hove Library	158,981	N/A	N/A
Saltdean Library	40,861	15,237	37%
Portslade Library	31,655	8,928	28%
Hangleton Library	29,435	12,454	42%
Rottingdean Library	28,837	14,488	50%
Patcham Library	28,288	11,917	42%
Woodingdean Library	20,268	11,192	55%
Whitehawk Library	18,576	8,078	43%
Moulsecoomb Library	14,633	7,844	54%
Coldean Library	10,797	5,200	48%
Westdene Library	10,039	6,582	66%
Hollingbury Library	6,554	2,908	44%
Grand Total	1,256,033	104,828	8%

Hourly footfall at both Jubilee and Hove (see Fig.3.) peak on weekday mornings, remain steady throughout the day but drop off gradually between 5pm and 7pm on their respective late opening days. Saturdays are particularly busy at Jubilee and sustained high footfall matches that of weekday mornings. Sunday footfall here tails off more with 11am-12pm being almost three times as busy on average as 4-5pm. At Hove, Wednesdays 6-7pm are particularly quiet, currently seeing an average of 29 visits. Saturday footfall tails off later in the day, with 10-11am being twice as busy on average as 4-5pm.

Fig.3. Footfall – Late nights and Weekends at Hove and Jubilee



Borrowing and PC use

As visits have reached pre-pandemic levels we have seen a natural plateau in the last year's data, but despite this, issues of both physical and online resources as well as PC use continue to rise (see Fig.4. and 5). Borrowing of eBooks has risen by 48% in the last two years alone. Multiple factors may explain this, including acceleration of the move to digital due to the pandemic, as well as a cost-of-living crisis driving customers towards public PC use and away from costly audiobook subscriptions.

Fig.4. Total item issues vs total visits 2022-25

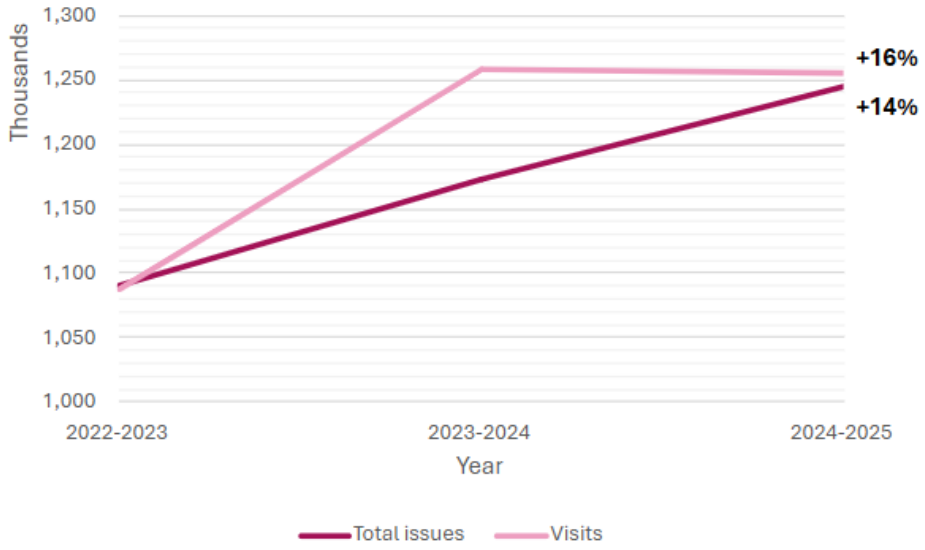


Fig.5. eBooks issued and Public PC hours used 2022-25

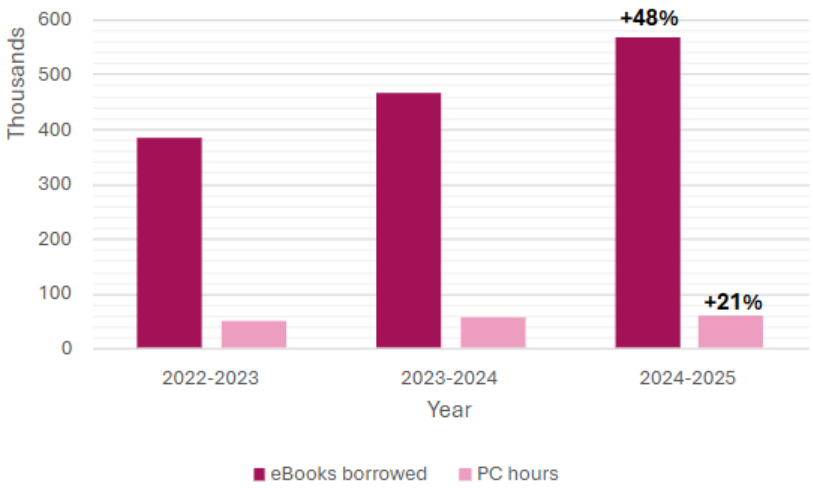
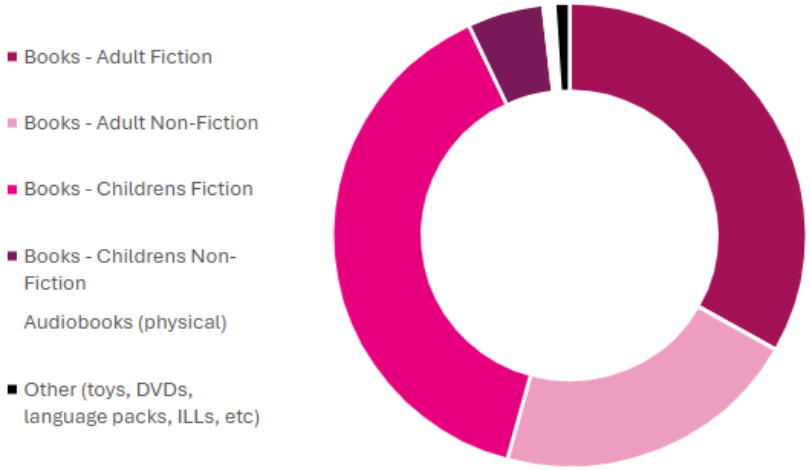


Fig.6. Issues by item category 2024-25



High-level analysis of issues by category shows that children's fiction remains the most borrowed of all items and resources, forming almost 40% of total issues (see Fig.6.) Borrowing of non-fiction continues to decline, following national trends.

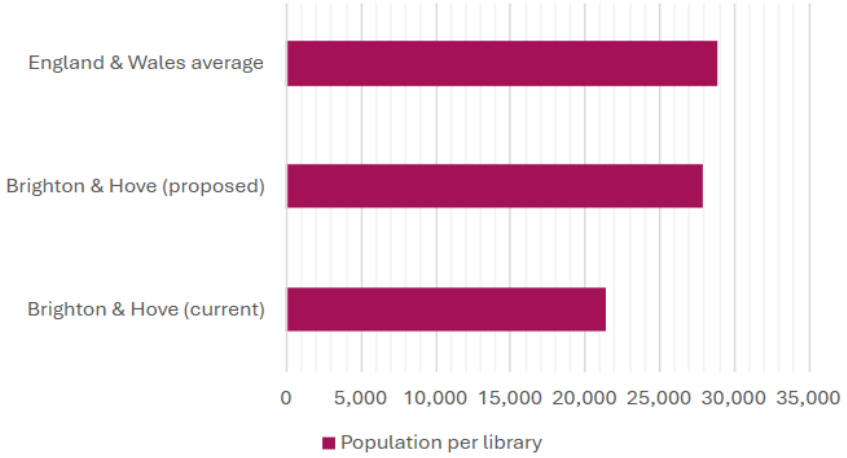
Comparison to national landscape

Recent data[3] released on the number of staffed libraries that each public library service in England and Wales has by population size provides useful context to the proposal to reduce the number of branches in Brighton & Hove and consolidate resources.

[3] Libraries Basic Dataset 2023, Arts Council England

Fig.7. highlights the fact that Brighton & Hove City Council currently offers more library provision per resident than average. It also shows that were the proposal to reduce the city's libraries from thirteen to ten to be taken forward, the city would still have more libraries per resident than the national average.

Fig.7. Population by paid staffed library – B&H vs national average



4. Community profiles and assessment of need

When assessing the needs of the communities served by each library branch, we used library catchment areas as defined on the Local Insight tool. These areas were sense-checked using recent borrower data, to ensure they remain accurate, and in the case of community libraries (all but Jubilee and Hove) they essentially cast a slightly wider net than the ward each library is located in. Sociodemographic data was analysed in part by these catchment areas where available, and in part by ward. Many libraries clearly predominantly serve a single ward. Where a library serves multiple wards, wards have been assigned based on library borrower data, and sociodemographic data has been aggregated to ensure all residents are represented in this process.

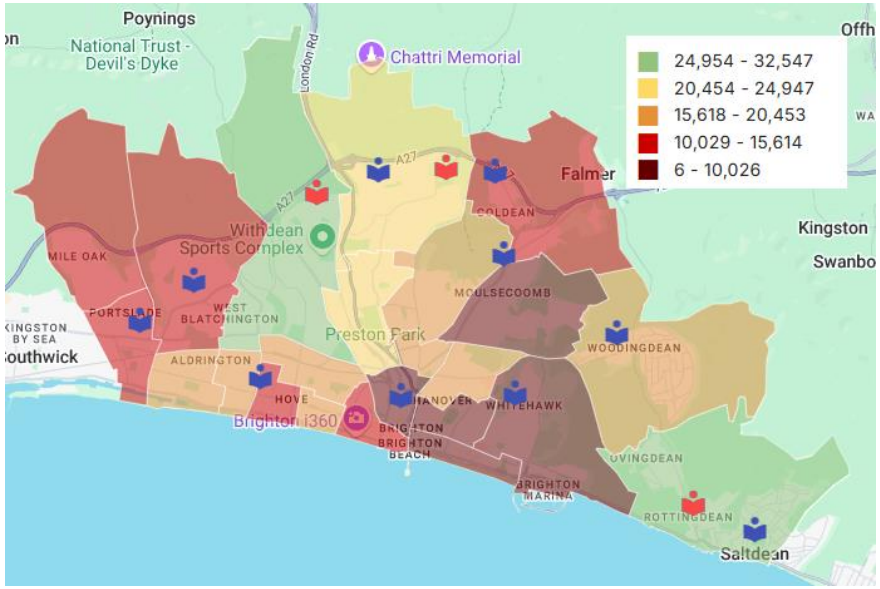
Index of Multiple Deprivation (IMD) 2019

The Index of Multiple Deprivation (IMD) datasets are small area measures of relative deprivation across each of the constituent nations of the United Kingdom. Areas are ranked from the most deprived area (rank 1) to the least deprived area. Each nation measures deprivation in a slightly different way but the broad themes include income, employment, education, health, crime, barriers to housing and services, and the living environment.

While this tool does not fully capture the nuances of individual experiences of deprivation, it does give a useful snapshot of need across the city, with Westdene & Hove Park and Rottingdean & West Saltdean ranked the least deprived in the city.

The subsequent sections highlight further detail about the demographics and social characteristics of each individual library catchment area, as well as necessary equality and inclusion considerations that emerge from the data.

Fig. 8. IMD 2019 rankings by ward (lower ranking = more deprived)



These community profiles by library are only a summary of the data reviewed and cannot reflect the nuances of individual experience in those catchments. A full Public and Stakeholder Consultation on a Cabinet decision will further inform the anlaysis.

Our Libraries

Coldean

Coldean & Stanmer ranks among the most deprived wards in the city with an IMD score of 28.08 (compared to the city's average of 20.76). 38% of the city's council-owned housing is situated in the ward and it has a higher working age population than average, due to the prevalence of university housing in the area.

0-16s make up only 10% of the ward's population, but they face relative challenge. 43% of school pupils are eligible for free school meals and a relatively high proportion of children and young people (35%) have special educational needs (SEN).

Operating costs at Coldean Library are relatively high compared to other community provision and a decline in visits in the last year gives it the highest cost per visit of all branches.

Hangleton

Hangleton is home to a relatively high percentage of children and young people (21% of ward total) and one of the highest numbers of Adult Social Care clients by ward. A relatively high number of the city's young people who are not in education, employment or training (NEET) live in Hangleton & Knoll.

Hangleton Library maintains reasonably high footfall, around 30k visits per year and strong membership figures – 3,668 active library members list this as their 'home branch' (25% of ward population). The ward's young demographic is reflected in borrowing here, with around twice as much children's as adult fiction issued annually.

Hollingbury (Old Boat Corner)

Hollingbury Library, based within Old Boat Corner Community Centre, has the lowest footfall of all branches (6,554 visits in 2024/25). The ward it is situated in (Patcham & Hollingbury) has two libraries, with neighbouring Patcham Library within 2 miles of here. Most recent membership figures for Hollingbury are 11% of ward population, compared with Patcham's 23%.

While at ward level, the area's IMD ranking suggests residents live at relatively low risk of deprivation, at a more granular level there are pockets of higher deprivation that should be acknowledged close to the centre in which the library is situated. Ward residents are at a lower risk of digital exclusion than the city's average and 84% of residents own a car.

Hove

Unlike the trend with community libraries, Hove Library's membership base is less concentrated in one area, with the majority of active borrowers spanning multiple wards to the west of the city. In aggregate, data suggests that those living in the library's catchment area are at low risk of deprivation, although certain nuances should be noted.

There are fairly high discrepancies between wards served by Hove Library – for example nearly 20% of over 65s in Brunswick & Adelaide are in receipt of pension credit, compared with 5% of those in Westdene & Hove Park.

Children living in the Hove coastal wards and Goldsmid are among the least likely in the city to be in low-income families (as defined by the DWP). Brunswick & Adelaide, Central Hove and Goldsmid wards have higher levels of school pupils from Black and racially minoritised backgrounds, as well as a higher percentage of pupils for whom English is an additional language (EAL).

Hove Library's listed status means that it is expensive to run and maintain, although income generated from a nursery school tenancy as well as room rental, goes some way to mitigate this.

Jubilee

The city's flagship Jubilee Library is situated centrally, in the heart of the North Laine area. It serves residents of its immediate central wards, as well as those from further afield travelling in and out of the city centre for work, play and study. These central wards are home to a higher percentage of the city's Black and racially minoritised residents.

The library also serves some of the city's most deprived wards, in particular West Hill & North Laine, Queens Park and Kemptown. 35% of pupils in nearby Kemptown and Queens Park wards are disadvantaged according to the Schools Census and 1 in 3 are in receipt of free school meals.

Jubilee Library is home to Temptations Cafe, the Business & IP Centre Sussex, Council Help Desks and will soon house Adult Education and Skills services.

Moulsecoomb

Moulsecoomb Library is situated close to the University of Brighton's Moulsecoomb campus in an area that has seen huge development in recent years – the introduction of a wealth of new student accommodation, housing and co-working spaces. A quarter of all Brighton & Hove City Council owned housing is located in Moulsecoomb & Bevendean ward.

Although very well connected by public transport, with many university bus routes serving it and its close proximity to a train station, footfall at this branch is relatively low compared to other suburban branches. It is located on the busy A270. While the library has a sizeable car park relative to its footprint, Moulsecoomb & Bevendean ward residents are among the least likely in the city to own a car. 1,858 residents of the city have Moulsecoomb listed as their home branch – 12% of the ward.

Similarly to Coldean, the ward has a high proportion of 'working age' residents, due to the location of the city's universities and the percentage of student housing nearby. Children, however, are still the most active borrower group here (the trend across many community libraries), with issues for children's fiction in 2024/25 being double that of adult fiction.

Half of children in the ward are in receipt of free school meals and 42% are deemed by the school census as being disadvantaged. The ward has the highest proportion of school pupils with special educational needs (37%) and the highest number of NEET young people in the city – some of whom are tutored at Moulsecoomb Library.

Looking at health indicators, 14% of people in the ward are living with a disability that limits them 'a little' and 9% have a disability that limits them 'a lot' - these are amongst the highest levels in the city. 7% of residents are economically inactive due to long-term illness or disability. The IoD Health and Disability ranking places Moulsecoomb & Bevendean residents amongst the most deprived in the city, alongside Whitehawk.

Patcham

Patcham Library has maintained very steady footfall of 28k visits per year for the last three years and has a strong membership base of 3,723 members (almost a quarter of the ward's total residents). The building is co-located with a community centre and is one of two libraries in the ward (with the aforementioned Hollingbury Library within 2 miles).

According to the Schools Census, 17% of children and young people in the ward are disadvantaged, lower than the city's average of 26%. DERI scores show that residents are at a relatively low risk of digital exclusion.

Portslade

Portslade Library, situated in South Portslade ward, is a busy community library averaging 30-35k visits a year and is co-located with the South Portslade Family Hub. It is also located on the same site as a local GP practice with which it shares a car park, and is a couple minutes' walk from Benfield Primary School.

Almost 60% of Portslade's current active borrowers live in North and South Portslade wards, with a further 15% coming from neighbouring Hangleton & Knoll.

With an IMD rank of 13,146, South Portslade is relatively deprived compared to the city average, and akin to neighbouring North Portslade and Hangleton & Knoll. 25% of residents in the library's catchment area do not own a car but the area is well connected by public transport – both bus and rail. Portslade is a relatively 'young' ward with 19% of the population being aged 0-16 and 29% of school pupils are in receipt of free school meals.

Rottingdean

The population of Rottingdean & West Saltdean is older than the city's average, with both the lowest percentage of 0-16s and the highest percentage of over 65s living in the ward. Nearly a third of the ward are over 65 but are the least likely in the city to be in receipt of Pension Credit and residents are at a relatively low risk of digital exclusion (2.78 DERI score compared to UK average of 3.0).

The ward has two libraries, with Saltdean Library situated aless than 2 miles eastward. An IMD rank of 25,035 suggests that residents in the ward are at a low risk of deprivation (second only to Westdene).

Rottingdean Library maintains good footfall, around 30k visits per year. It is however the most expensive community library in the city to run due to its location within a Grade II listed building (The Grange) and the associated maintenance costs.

Saltdean

Saltdean Library was refurbished as part of the wider Saltdean Lido development and reopened in March 2024. Footfall at the branch goes from strength to strength and with over 40k visitors in 2024-25 it is now the city's busiest community library, with only Hove and Jubilee libraries exceeding this figure.

The ward (Rottingdean & West Saltdean) has two libraries, with Rottingdean Library situated less than 2 miles westward.

An IMD rank of 25,035 suggests that residents in the ward are at a low risk of deprivation. Saltdean has a higher membership than its neighbouring branch, with 2,460 people registered here compared to 1,609 at Rottingdean.

Westdene

Westdene Library has one of the smallest footprints and is co-located with Westdene Primary School. It is perhaps therefore not surprising that four times as much children's fiction as adult fiction is borrowed from this branch.

Westdene Library is the second least visited in the city and has the biggest percentage of Libraries Extra footfall with 66% of customers attending during unstaffed hours. It incorporates no commercial space.

Residents of Westdene & Hove Park ward are the most likely in the city to own a car and have qualifications. They are the least likely in the city to be digitally excluded, economically inactive or in receipt of benefits. It is the lowest scoring (least deprived) ward in Brighton & Hove with an IMD ranking of 28,634 and has the lowest number of economically inactive residents. The ward has the lowest crime rate in the city and children here are the least likely (by a significant majority) to be in receipt of free school meals.

Whitehawk

Whitehawk Library is co-located with other council services at Whitehawk Community Hub and the library service manage commercial spaces within the same building that are income-generating. It also incorporates a Toy Library.

The library is situated in Whitehawk & Marina ward, though library management system data shows that it has a lower-than-average core audience living its immediate vicinity. A significant number of active borrowers also travel here from Kemptown and Queen's Park and it is interesting to note that residents of these three wards are the least likely in the city to own a car.

According to the IMD, Whitehawk & Marina ward is the most deprived in the city. Schools Census data shows that 56% children living in the ward are in receipt of free school meals – far above the UK average of 24.6% - and that the ward has the highest number of NEET young people.

Residents of the ward are the most likely in the city to be digitally excluded, with a DERI score of 3.48 (compared to UK average of 3.0). Nearly 10% of residents are economically inactive due to long-term sickness or disability (Census 2021) - the highest in the city.

Woodingdean

The population of Woodingdean has a high percentage of over 65s (22%) compared to the city's average (14%). Residents here are at higher risk of digital exclusion than in other wards with a DERI score of 3.01. Alongside Whitehawk, the ward has the highest percentage of adults over 16 without qualifications in the city. 31% of children living in the ward are in receipt of free school meals, higher than the city average of 26%.

Woodingdean Library is co-located with Woodingdean Medical Centre and is in the immediate vicinity of Woodingdean Primary School, with Downs View special school nearby.

Ward comparisons

In order to make decisions about where need for library branches is greatest, it is necessary to compare area data against some key socioeconomic indicators. While we offer a 'cradle to grave' service, we know that libraries improve quality of life for residents at particular points of need in life, including in childhood and youth, in ill-health and in older age.

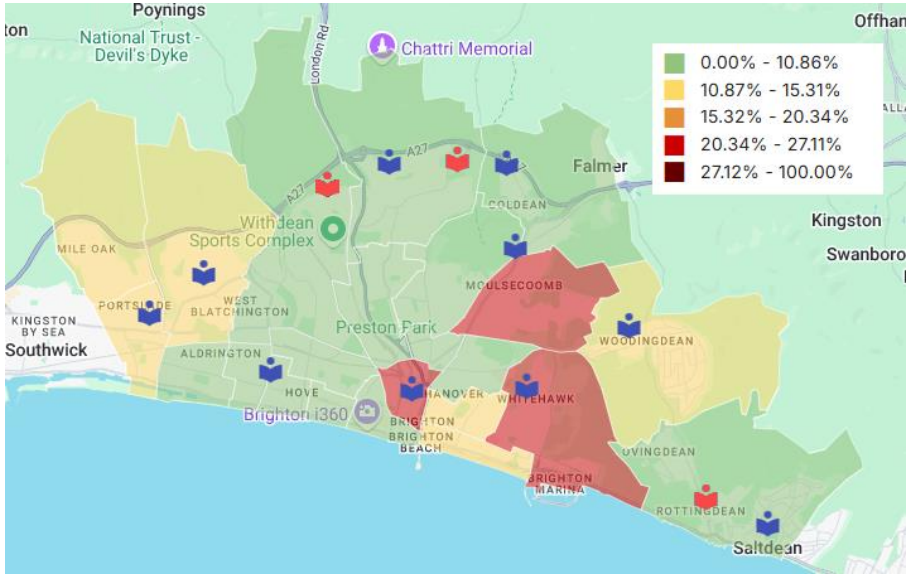
Protecting children and young people living at disadvantage in Brighton & Hove from the effects of library closure:

In 2023, the National Literacy Trust found that the percentage of children and young people aged 8 to 18 who said that they didn't have a book of their own at home increased compared with the year before, particularly for those from lower-income homes[4].

In 2022 nearly 1 in 10 children receiving free school meals (FSMs) said they did not have a book of their own. Since then that figure has risen to 1 in 8. Children who are on FSMs are twice as likely not to own a book as those who are not. In fact, the percentage-point (pp) gap in book ownership between children and young people who receive FSMs and their peers who do not (6.6 pp) is now at its largest in a decade.

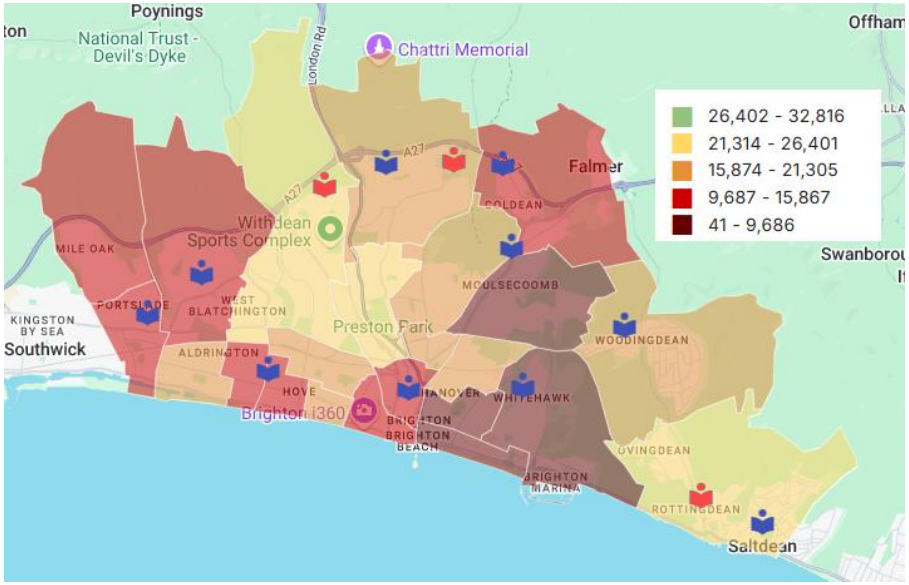
Fig. 10. Percentage of children aged 0-19 in relative low-income families

[4] www.nlt.cdn.ngo/media/documents/Book_ownership_in_2023_k6ovIWY.pdf



information and Books on Prescription, hosting healthcare events and opportunities, delivering books to those who are housebound and addressing social isolation and loneliness.[5] While overall life expectancy has risen in Brighton & Hove, healthy life expectancy has declined in recent years, meaning people are living longer but with more health issues. Additionally, the number of people with long-term health conditions or disabilities is increasing.

Fig. 11. IoD Health Deprivation and Disability Rank



Protecting those at greatest risk of health deprivation in Brighton & Hove from the effects of library closure:

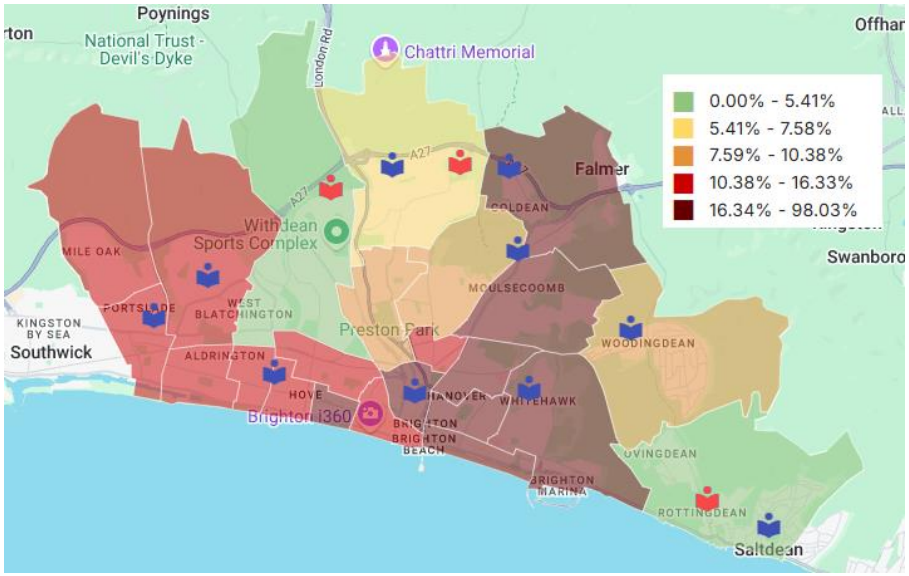
We also know that libraries support people to live healthier lives in a range of ways, including providing access to health

[5] www.dcmslibraries.blog.gov.uk/2016/09/26/healthier-and-happier-lives-how-libraries-deliver/

Protecting older people living at disadvantage in Brighton & Hove from the effects of library closure:

The effects of our aging population are also among the biggest social challenges we will face over the coming decades, as a society, economically, and within our own families. There is a wealth of evidence that libraries have a huge part to play in combatting social isolation.[6] Brighton & Hove has a higher proportion of older people living in poverty compared to England and the South East.[7]

Fig. 9. Percentage of pensioners living in poverty



Protecting other groups at risk of disadvantage in Brighton & Hove from the effects of library closure:

We recognise there are other demographics of communities that could be considered when looking at the effects of library closure. This is information we are looking to seek views on during the public consultation, if approved at Cabinet. These considerations will include intersectionality of residents, where people may be members of multiple communities at risk of disadvantage or where changes to library closures may affect them.

[6] Stand by Me - The contribution of public libraries to the well-being of older people, Arts Council England, 2017.

[7] Ageing Well in Brighton & Hove

5. Opportunities

There are opportunities to make more data-led decisions about library provision in the future, responding directly to patterns of use and the specific needs of residents in different areas of the city. This would extend to mitigating the risks of potential community library closures with alternate provision, for example:

Community Collections tailored to residents

Community Collections are an existing model for trust-base book collections in community spaces, currently operating from Hollingdean Children's Centre and St Luke's Church, which could be introduced in more areas. With the addition of the library service's new Collection HQ tool which makes library data analysis much more possible, these collections could be tailored accurately to the communities they serve.

Targeted marketing of the Home Delivery Service

The Home Delivery Service (HDS) could be marketed in a more targeted way going forward, using the most recent data we have on where older people in the city who are most in need live. We acknowledge that library use is not just about book borrowing, and many current HDS clients benefit from seeing their HDS volunteer on a regular basis. Where proposals for library closure are taken forward, we can identify and reach new customers for the HDS who may be put at risk of social isolation from the loss of a library branch.

Retaining customers and improving their experience

Were a reduction of evening opening hours and library closures to be taken forward, we would want to do everything in our power to retain and consolidate our customer base. We know that customer experience is key to retention, and so we will not miss the opportunity at public consultation to better understand what residents value most about their current library access.

Further promotion of popular online library offer to compliment physical resources

Since 2021, UK public libraries have experienced a 34% increase in eBook and audiobook checkouts, indicating a sustained rise in digital borrowing[8]. Demand for, and use of, Brighton & Hove Libraries' free online collection of eBooks, eAudio and electronic resources reflects this and continues to grow exponentially year-on-year. This already compliments the rest of the library offer by expanding access, convenience, and

[8] UK Libraries Achieve Record-Breaking Circulation of Digital Media in 2023 - OverDrive

resource diversity, but with strategic focus on marketing activity around it, its audience could be significantly extended.

Addressing disparity between ‘need’ and ‘use’ in areas of the city

This analysis has identified disparities in some areas of the city between need (in terms of social outcomes that we know libraries can support) and current library usage. Predominantly, this is the case in Whitehawk and Moulsecoomb. There is a case for strategic focus around these libraries, to work with residents (both current library users and potential) to drive use and ensure we have a library offer at these locations that feels relevant and has impact.

6. Recommendations

Proposal of a reduction in hours at Jubilee and Hove

At Jubilee, a reduction of two hours on a Monday evening (5-7pm) and three hours on a Sunday afternoon (2-5pm) would have the least impact in terms of footfall. Sunday mornings 11am-12pm at Jubilee being almost three times as busy on average as 4-5pm.

At Hove, where Wednesdays 6-7pm currently sees an average of 29 people, a reduction of two hours (5-7pm) would have the least impact in the week. Saturdays 10-11am are twice as busy on average as 4-5pm and so a reduction in hours in the afternoon (2-5pm) would have less impact on the library's footfall.

Proposal to consider closure of Rottingdean Library

Rottingdean & West Saltdean is one of the least deprived wards in the city and is home to two community libraries, with Saltdean and Rottingdean branches less than 2 miles apart and well connected by bus. Rottingdean has the highest building costs of all the community libraries and can expect ongoing high maintenance and management costs due to its heritage status.

Proposal to consider closure of Westdene Library

Data shows that Westdene & Hove Park is the least deprived ward in the city. Westdene Library's footfall is consistently lower than other community branches, currently forming 0.8% of the service's total visits. The library is close to neighbouring Patcham Library and there are good public transport links and high car ownership levels in the area. Library data shows that those in the postcode sectors to the south of the ward already use neighbouring Hove and Hangleton branches.

Proposal to consider closure of Hollingbury Library

Patcham & Hollingbury is another ward containing two libraries, with Patcham and Hollingbury (Old Boat Corner) branches less than 2 miles apart. Footfall is considerably higher at Patcham (and consistently so) and management costs associated with Hollingbury's site are much higher than average.

7. Next steps

The data presented here only forms part of the picture, and any decisions made about changes to library provision in the city should be justifiable, considered and socially responsible. It is therefore imperative that the views of, and the impact on, library users and residents is taken into account, alongside any assessment of data.

A formal12-week public consultation on proposed changes will be conducted in order to more fully understand the potential impact, the findings of which will form Part 2 of this Needs and Use Analysis.

Brighton & Hove Libraries

Needs and Use Analysis

Part 2: Consultation feedback

Informed by Public Consultation – Summer - Autumn 2025. Link paper to the Part 1 data analysis produced in July 2025.

December 2025

Brighton & Hove City Council

Analysis contents

1. Purpose of document
2. Executive summary
3. Summary of proposals
4. Process we've followed
5. Understanding of needs and use of the library service
    a. Understanding of Library Use
    b. Understanding of Community Profiles and assessment of need
6. Reflection on the four key factors – need, use, geography and cost
7. Assessment on impact of proposals
8. How this links to wider strategy and sustainability work
9. Opportunities and alternative models
10. Conclusions, next steps and recommended actions
11. Linked documents

1. Purpose of this needs and use analysis

A needs and use analysis is required whenever a council proposes changes to its statutory library provision. The Public Libraries and Museums Act 1964 obliges councils to provide a “comprehensive and efficient” library service for all who live, work, or study in the area. The analysis helps demonstrate that any proposed changes will still meet this duty. The full analysis comprises the part 1 document produced in July 2025 and this part 2 document, which has been prepared following a public consultation and additional research. There are other linked documents which set context and rationale, details of which can be found in Linked Documents at the end of section 11.

A needs and use analysis is one of the key tools for councils to make lawful, fair, and effective changes to library services. It ensures that decisions are evidence-based, inclusive, and transparent, and that the council continues to meet its statutory duties while responding to local needs and financial realities.

This needs and use analysis:

- Assesses who uses library services, how and why.
- Identifies which groups are most affected by changes.
- Evaluates whether alternative provision can meet essential needs.
- Demonstrates that proposals are evidence-based and proportionate, especially regarding equality duties

2. Executive summary

This needs and use analysis (parts 1 and 2) covers the statutory, evidence-based review of Brighton & Hove’s public library services, combining quantitative data and extensive public consultation to assess current and future needs across the city. The analysis identifies who uses library services, how and why, and which groups would be most affected by proposed changes. It considers the impact of proposals to reduce opening hours and close specific libraries, with particular attention to vulnerable groups such as children, older people, disabled residents, low-income families, and marginalised or disadvantaged communities. The findings highlight the value of libraries as inclusive, accessible community assets and inform recommendations to ensure that any changes maintain a comprehensive and efficient service, in line with legal obligations and the city’s long-term sustainability goals.

3. Summary of proposals for change

Brighton & Hove City Council has proposed changes in public library provision in the city to not only improve sustainability but also to deliver on the savings plan for 2025-27. Concentrating resources on fewer physical library locations and a reduction in opening hours, whilst maintaining a geographic spread across the city, will support longer-term sustainability of the wider city service, as well as safeguarding the quality of library provision.

In February 2025 as part of the council budget decisions councillors agreed to reduce the Library Service revenue

budget by £210,000, likely to be achieved through a reduction in public services, to include library closures and a decrease in opening hours.

In the spring and early summer of 2025, council officers worked closely with the administration to develop proposals for changes to the public library offer to meet the savings whilst maintaining a comprehensive and efficient service

Officers conducted the first part of a Needs & Use Analysis, looking at the usage statistics of each library, the levels of deprivation and needs in each area, the cost of delivering services and the geographic spread of sites across the city. Proposals were identified through analysis of four key factors – need, use, geography and cost.

It was proposed and agreed by Cabinet in July 2025 to commence a public consultation on the proposals, specifically covering the following suggestions:

- Consult on a proposed closure of Hollingbury Library
- Consult on a proposed closure of Rottingdean Library
- Consult on a proposed closure of Westdene Library
- Consult on proposed changes in opening hours at Hove Library
- Consult on proposed changes in opening hours at Jubilee Library

An Equalities Impact Assessment was prepared with regard to the consultation process.

The opening hour changes and libraries closure proposals were put to a public consultation which ran for 12 weeks from 18 July to 10 October 2025.

The consultation was extensive and provided much feedback and reflection, not only on the proposals but also on the wider needs and use of the city's library service. This provides a valuable insight ahead of drafting a new city library strategy in 2026 – covering many elements of providing a comprehensive and efficient service.

Following the public consultation, the review of Part 1 of the needs and use analysis, collation of this Part 2 and with reference to the other linked documents, the following proposals are being made to Cabinet in December 2025.

That having considered the information provided in this report and its appendices, Cabinet agrees to make the following changes to existing library provision, being satisfied that its remaining provision complies with its statutory obligation to provide a comprehensive and efficient library service

Cabinet agrees to reduce opening hours at Jubilee Library by 5 hours/week on Monday evenings and Sunday afternoons from 1st April 2026;

Cabinet agrees to reduce opening hours at Hove Library by 5 hours/week on Wednesday evenings and Saturday afternoons from 1st April 2026;

Cabinet agrees to close Hollingbury Library on 31st March 2026 and notes that officers will work with partners in exploring alternative options for future community based provision;

Cabinet agrees to continue the existing library provision in Rottingdean with a further report to be brought back to Cabinet in 12 months to review the outcome of work with community partners;

Cabinet agrees to close Westdene Library on 31st March 2026 and notes that officers will work with partners in exploring alternative options for future community based provision;

That Cabinet delegates authority to the Corporate Director for Families, Children and Wellbeing, working in consultation with the Cabinet Member for Sport & Leisure, to take all steps necessary or incidental to the delivery of the recommendations in the paragraphs above.

4. Process we've followed

A detailed data-based needs and use analysis was published in July 2025 to inform the Cabinet report proposing the public consultation. It is a stipulation from the Department of Culture Media and Sport (DCMS), that changes to library provision in a local area should be informed by a local needs and use analysis approach. This should include:

Consideration of the needs of those who live, work and study in the area

- An assessment of accessibility
- Consideration of the views of existing users
- An assessment of whether any specific communities or groups would suffer adverse impacts
- Consideration of information from partner organisations and other departments

The following phases form the local needs assessment, designed with the above criteria at the fore:

Phase 1: Needs and Use Part 1 - Data Analysis - Spring 2025

Phase 2: Needs and Use Part 2 - Public & Stakeholder Informed by Consultation – Winter 2025

Should library service changes be decided upon then a further 2 phases will be delivered:

Phase 3: Staff Consultation – Winter/Spring 2026

Phase 4: Implementation of changes - Spring 2026

Part one of this needs and use phase consisted predominantly of desk-based research and data analysis. Data reviewed included footfall, borrowing data (about what resources are borrowed, when and where) from library management systems, 2021 Census data, ONS and DWP data available via the Local Insight platform[1], and additional data provided by colleagues from across BHCC including numeric Schools Census, travel and Adult Social Care data.

Part two of the needs and use analysis (this document) details an analysis of needs and use of library service users informed by the formal Public Consultation that was held in Summer/Autumn of 2025, as well as additional data necessary for evidencing and contextualising what we heard. This additional data has come from a further look at what is available on the city's Local Insight website (where we gained further insight into English as an Additional Language rates and further information about Black and racially minoritised residents) and from the latest release of the English indices of deprivation 2025.

The consultation ran for 12 weeks, with 2711 survey responses, over 150 emails, posters and letters from school children and engagement from nearly 400 residents in online and in-person consultation meetings. A full report on the consultation outcome is available within the linked documents. That report, alongside the accompanying equalities impact assessment, fully details what those consultation responses tell us about the needs and use of residents, customers and the library services in the city.

It is clear from the responses received to the public consultation that the library service is a valued and important community asset, especially for children, families, older people, disabled residents, and those experiencing digital or financial exclusion.

Respondents offered a variety of alternative models and funding suggestions, often emphasising the long-term social value of libraries over short-term financial savings.

5. Understanding of the needs and use of existing or potential library service users

Context of Brighton & Hove

Brighton and Hove had a population of approximately 277,100 as of the 2021 Census, reflecting a modest 1.4% increase since 2011. The median age was 38 years, an increase from 35 years in 2011, yet still younger than the South East average of 41 and England's 40. Notably, the number of residents aged 50 to 64

[1] www.brighton-hove.localinsight.org

increased by 30% between 2011 and 2021, while those aged 35 to 49 decreased by 7.9% during the same period.

Brighton & Hove has become increasingly ethnically diverse. 26% of residents (approximately 72,272 people) identified as Black and Racially Minoritised in 2021, up from 19.5% in 2011. This proportion is higher than the South East average of 21% and aligns with the national average for England.

Administratively, the city is divided into 21 electoral wards, across which the needs of residents vary greatly.

A library service responsive to change

The city's public library service currently comprises 13 libraries (see Fig.1.), including the flagship Jubilee Library in central Brighton, Hove Library, and 11 community libraries located in Coldean, Hangleton, Hollingbury, Moulsecoomb, Patcham, Portslade, Rottingdean, Saltdean, Westdene, Whitehawk and Woodingdean. Jubilee Library, opened in 2005, stands out as one of the most visited libraries in the UK, recording over 830,000 visits in the 2023/24 period and accounting for about 50% of the city's library transactions.

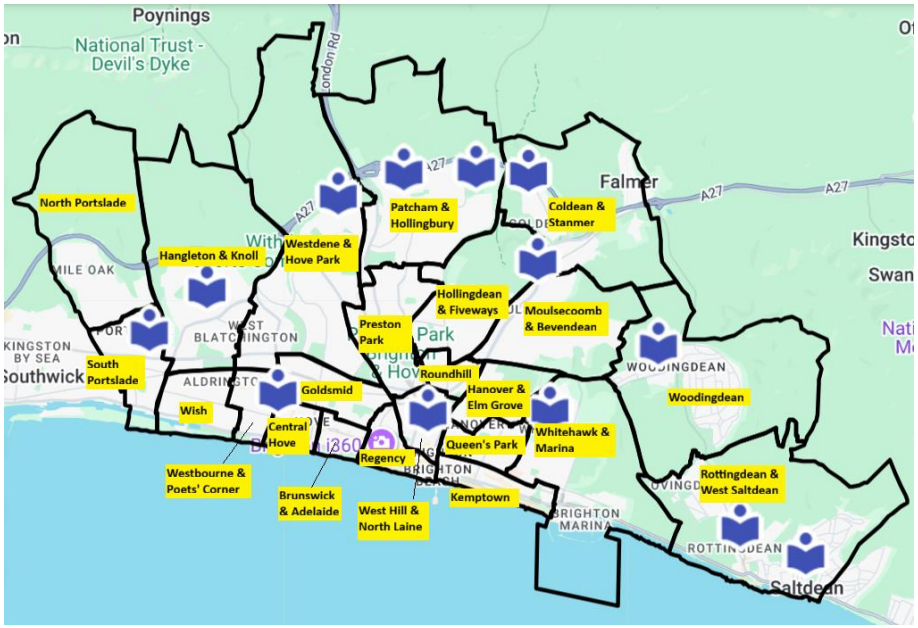
Over the past decade or so, Brighton & Hove Libraries has undergone significant transformation to adapt to changing community need and financial constraints, as well as the Covid-19 pandemic. In 2013, the mobile library service was withdrawn and replaced by a more cost-effective Home Delivery Service that has maintained access for residents unable to visit library branches. Against a backdrop of national library cuts, the city retained all of its branches for the next decade, until Mile Oak library was closed in July 2023 due to low visitor numbers and high buildings costs. In the same year, staffed days at community libraries were reduced and in 2024 the Libraries Management Team was also reduced, to meet savings targets.

In the three years preceding this, the service responded quickly and effectively to the Covid-19 pandemic. Pivoting to a click and collect format of delivery and sharing online Storytimes and activities for children at home, whilst ensuring the safety of staff and customers as a priority.

Despite these challenges, Brighton & Hove Libraries has embraced innovation and inclusivity. The introduction of the 'Libraries Extra' initiative (at a time when libraries nationally were closing) has extended opening hours and improved access through a combination of staffed and unstaffed periods. In 2020, Jubilee Children’s Library was refurbished and still receives public acclaim today.

Furthermore, in 2024, all 13 libraries in the city were collectively awarded the 'Library Service of Sanctuary' status, recognising their commitment to providing welcoming spaces for refugees, asylum seekers, and other marginalised groups. In the same year, the newly refurbished Saltdean Library, based within Saltdean Lido, was opened. Part of a broader development of the listed site, the majority funder of this project was the National Lottery Heritage Fund.

Fig.1. Library locations and ward boundaries



In May 2025, council customer services were integrated with libraries. Two new Council Help Desks opened at Jubilee and Hove, operating Monday – Friday 10am-5pm, which, along with the council's telephone switchboard are now staffed by library officers. With the addition of free self-help telephones and PCs across all branches, libraries are enabling more face-to-face support to access council services for those who need it most.

This context underscores the evolving landscape of public library provision in Brighton & Hove, reflecting efforts to balance resource limitations with the goal of serving a diverse and growing urban population.

Future populations of Brighton & Hove

As per the Context of Brighton & Hove section above, by looking at trend data and the 2021 census data, some more information about current and potential future populations of the city can be extrapolated.

Brighton & Hove's population changes are not evenly distributed across all age groups

Difference between 2021 Census and 2020 Mid-Year Estimates.
In the 2021 Census there are...

- Fewer children aged 0 to 10 years old, a decrease of 9% (2,805 people)
- Fewer adults aged 21 to 32 years old, a decrease of 22% (15,253 people)
- More adults aged 49 to 52 years old, an increase of 9% (1,353 people)

Difference between 2021 Census and 2011 Census.
In the 2021 Census there are...

- Fewer children aged 0 to 7 years old, a decrease of 16% (3,826 people)
- Fewer adults aged 23 to 46 years old, a decrease of 10% (10,284 people)
- More adults aged 48 to 62 years old, an increase of 32% (13,826 people)
- More adults aged 65 to 77 years old, an increase of 20% (4,341 people)

Brighton & Hove has a different population profile compared to the South East and England

Brighton & Hove has a much higher proportion of people aged 18 to 34 years old (28%, 78,759 people) compared to only 20% in the South East and 22% in England.

Brighton & Hove has a lower proportion of children aged 0 to 15 years old (15%, 41,735 people) compared to 19% in both the South East and England.

Brighton & Hove has a lower proportion of people age of 57 to 87 years old. In Brighton & Hove just over one in five of the total population (22%, 59,583 people) is aged 57 to 87 years old compared to 28% in the South East and 27% in England.

The higher population of people 18-34 may well be explained by being a double university city. We know many areas of the country are experiencing the decline in child population

numbers, but it is starker here in Brighton & Hove than many places.

In the last year the City Council has begun consultation on its longer-term City Plan, setting out the framework for development—including housing—up to 2041. The plan, due to launch in 2027, will:

- Set out policies to guide future development, including the scale and location of new housing.
- Identify how much new housing is needed to meet the needs of residents.
- Encourage high-quality, well-designed, and sustainable places.
- Ensure new development is supported by necessary infrastructure.
- Address affordability, accessibility, and the needs of diverse communities.

The city faces severe land constraints, so meeting these targets will require creative solutions, including higher-density development, redevelopment of brownfield sites, and collaboration with neighbouring authorities.

5a Understanding of library use

Part 1 of this Needs and Use Analysis, published in July 2025, provided a comprehensive data review of the current use of library services in the city.

During the public consultation we asked for further information from respondents, to provide further insight and understanding to the raw data collected by the service.

An overall summary of the responses gained during the public consultation included the following reflections and contributions:

- Libraries are used by a diverse range of users, including children, families, older people, disabled people, carers, and by people who are part of communities that are less represented in the wider population or who may face additional barriers to inclusion and access.
- Respondents reported using a wide range of library services, including community collections, home delivery, online resources, and physical visits
- Usage patterns and dependencies on other libraries vary by branch:
- Most library visits are made on foot or by public transport, with accessibility and proximity being crucial for many users, especially those with mobility challenges.
- Libraries are valued by many as safe, free, and inclusive community spaces, providing warmth, shelter, and opportunities for social interaction.

- Children and young people were reported to use libraries for literacy, homework, and after-school activities, with comments made about links to local schools enhancing their value.
- Older people and those experiencing social isolation depend on library services for social contact and access to information, particularly those who are digitally excluded.
- Disabled users appreciate libraries for their accessible facilities, such as public toilets and quiet spaces.
- Low-income families and digitally excluded residents were reported to rely on libraries for free access to books, computers, and the internet, supporting job-seeking, benefits, and education.
- Groups at risk of marginalisation/disadvantage, including LGBTQ+ people and those with neurodiversity often see libraries as welcoming and neutral spaces, important for community cohesion and access to relevant resources for those communities.
- Responders reported a reliance on libraries for regular visits, social activities, and essential services such as baby changing, computer support, and shelter from bad weather.

Comparison with data collected in Part 1

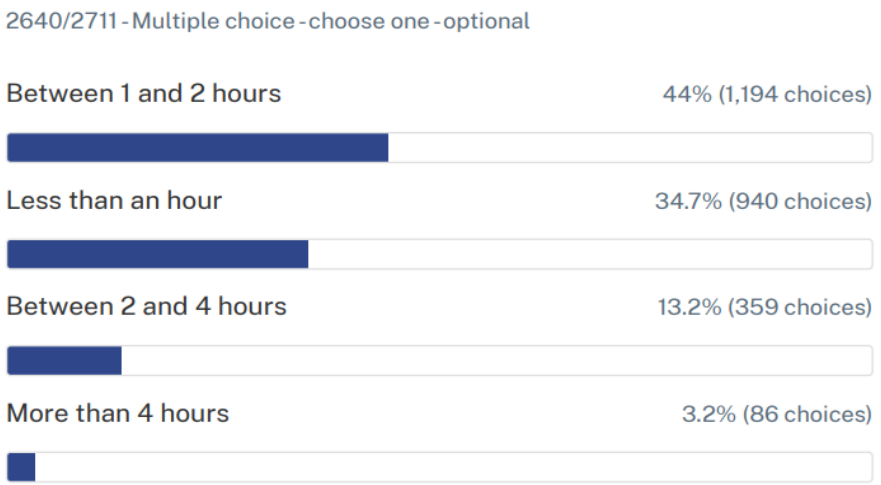
The public consultation responses provide a wider understanding of the impact of the proposals.

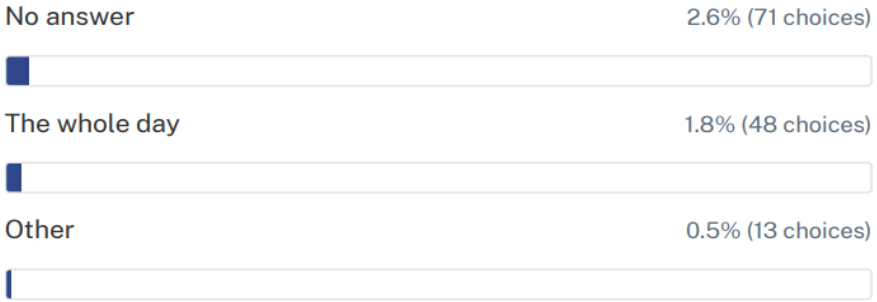
Footfall vs length of time spent in libraries

Part 1 detailed data collected across all libraries on footfall – this is measured by a heat sensor at each library front door. This provides useful data on the numbers of people entering and leaving the buildings. However, what it doesn't provide is an overview of how long individuals are staying in the libraries.

This was asked within the consultation and the following information was gained from the survey responses.

We asked how long people spent in the libraries, on an average visit:





Part 1 of the analysis provided an hourly average breakdown in the footfall numbers at Hove and Jubilee Libraries. This informed an understanding of the quieter times in the library spaces, to inform proposals to reduce opening hours.

For reference here are the current full opening hours:

Jubilee

Monday, Tuesday and Thursday – 10am to 7pm

Wednesday, Friday and Saturday – 10am to 5pm

Sunday – 11am to 5pm

Hove

Monday, Tuesday, Thursday, Friday and Saturday – 10am to 5pm

Wednesday – 10am to 7pm

Here is the footfall data for the relevant times – expressed below as a percentage of each library's average weekly total visits (2024-25).

Jubilee

Mondays 5-7pm	1%
Sundays 2-5pm	4%

Hove

Wednesdays 5-7pm	2%
Saturdays 2-5pm	6%

The new information about how long people spend within the libraries provides valuable insight into how many people may be impacted by arriving at a library an hour or two ahead of a proposed closure time; some people would still be hoping to use the library for an extended time and therefore will be impacted by an earlier closure. Head counts taken during the consultation at times affected by the proposals do suggest this may be the case at Jubilee on Monday evenings, where despite less new customers entering, many are staying up until closing at 7pm. However, weekend head counts at Jubilee and Hove, and Wednesday evenings at Hove fell below the footfall figures, suggesting that visitors on these days and times aren't visiting for long.

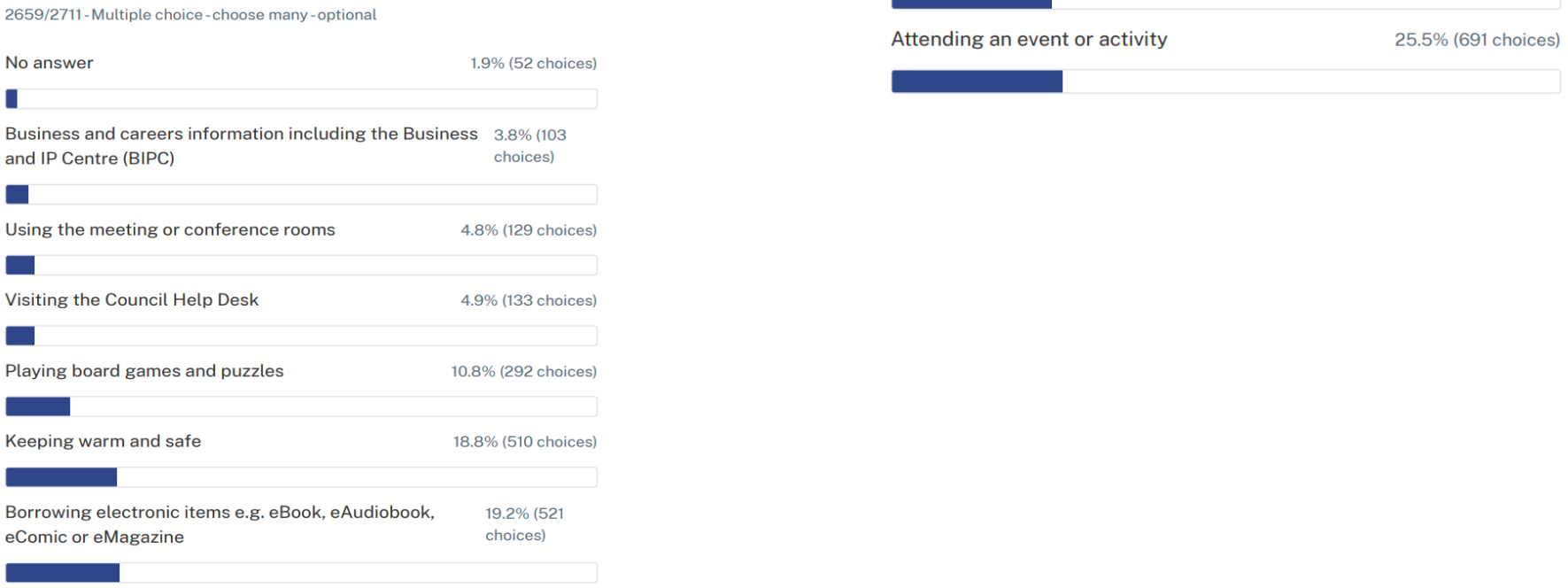
Data on issues/PC use vs what people actually do with the library service offer

Part 1 of this analysis provided data on items issued (typically referred to as borrowing), comparing it with the data already

known about footfall within the libraries. That shows us that more people were using the libraries than there was borrowing activity.

During the public consultation we asked people about what services they use whilst visiting or using (as some are online) library services:

Respondents were given the option to tick as many services as they liked, as well as the chance to specify other service aspects not listed.





The answers of respondents who chose 'other' can be categorised as follows (in order from most to least cited):

- Baby changing
- Playing with and reading to children
- Using the toilet
- Using the cafe (Jubilee)
- Meeting with a Library Connect volunteer (computer support)
- Revising
- Breastfeeding
- Sheltering from bad weather
- Attending social groups and events
- Paid employment in a library

This additional information gathered within the public consultation provides us with valuable insight into the wide and varied range of uses of the library services, which adds to and expands upon what was already known about borrowing.

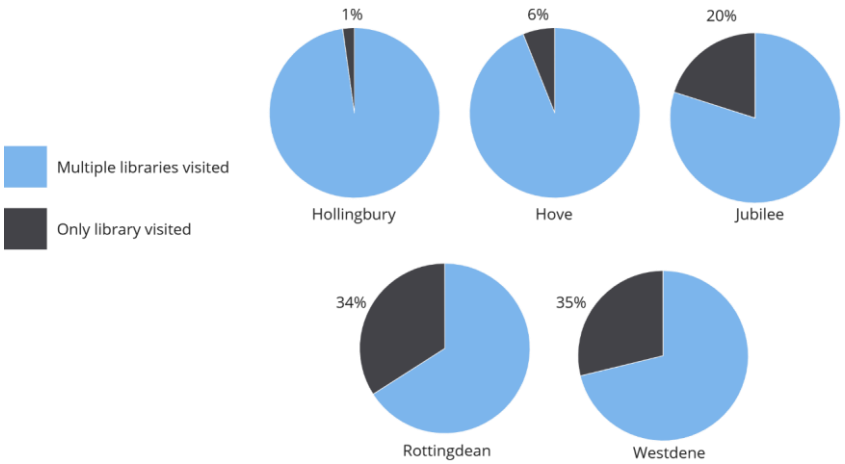
Another area of helpful insight was understanding better whether people used one sole library or visited multiple sites. This helps us start to understand what alternative library use could look like, when considering reductions to library services.

The survey within the public consultation asked responders about single library site use vs multiple library site use in areas affected by the proposals.

From this we learnt that among respondents who reported visiting the libraries affected by the proposals, the proportion who reported that they had used only one specific library in the past year varied significantly between branches — from just 1% of Hollingbury users to 35% of Westdene users who exclusively used that branch.

While 35% of Westdene users only use this branch, the remaining 65% are likely to also use Jubilee or Patcham. 34% of Rottingdean users use Rottingdean alone and the remaining 66% are likely to use Saltdean or Jubilee. Hollingbury users are

likely to also use Patcham and Jubilee, with only 1% reporting using just this branch.



This tells us that whist there are a significant percentage of library service users who do use more than one library site, there are some that currently do not and this needs to be considered where there are proposals to reduce library service provision, but especially where closures are proposed.

In order to understand this better we asked survey respondents whether they can access alternative libraries, and for the three proposed closure libraries, the nearest alternatives were named as examples of ones nearby.

We heard that 30% of those that responded to this question answered that they couldn't access alternatives, and 29% answered that they could. 27% responded that they were not sure and 14% answered with 'no response'.

We asked a follow up free text question to understand more about those that cannot access alternatives.

A frequently cited concern is the difficulty of physically accessing alternative libraries, especially for:

- Disabled residents who face mobility barriers and cannot easily use public transport or carry books.
- Families with young children, for whom walking longer distances or navigating hilly or difficult terrain is impractical.
- Elderly users, who rely on proximity and familiarity and often cannot drive or afford transport.

Public transport was described as inadequate, expensive, and inconvenient, with some routes requiring multiple buses or crossing busy roads.

Many respondents expressed that transport costs—whether bus fares or fuel costs if driving —make regular visits to alternative libraries unaffordable. This concern was more acute for:

- Low-income families who use libraries as a free resource for books, internet, and community engagement.
- Those who would need to drive instead of walk, raising both cost and environmental concerns.

Some also stressed the importance of libraries being within walking distance, as they are often used for after-school visits and are integral to the daily routines of families.

Some highlighted the fact that their library offers the only accessible public toilet in their area. While some would consider driving to the next available library, parking is cited as a barrier to this (the example of limited spaces in the on-site car park at Patcham being given by multiple respondents).

The public consultation was also an opportunity to find out more about people's use/thoughts about Libraries Extra. The Part 1 analysis provided data on visitor numbers during Libraries Extra opening hours but in order to fully understand how proposed library reductions can be best managed or mitigated it was important to ask for more detail.

We asked in the survey whether respondents used Libraries Extra at any libraries (an offer that is currently only available at community libraries). 46% answered no and 45% answered yes. We already recognise that not everyone would / could use the Libraries Extra offer. For example, young people under the age of 16 are not allowed to use it for Health, Safety and Wellbeing reasons, but some may have replied to this question in the survey.

In order to understand the responses further, we asked a supplementary question on why people don't use Libraries Extra.

Most people replied that they do not use Libraries Extra because they are unaware of it. Many also said they had heard of it but were not sure what it was or how to sign up for it.

A number of respondents stated they do not need to use Libraries Extra because their needs are met during regular staffed hours or at libraries (Jubilee or Hove were both cited here) that have good opening times. Some haven't needed to use it yet or haven't got around to registering. A small number cited technical issues as a barrier to using Libraries Extra. Another common theme is that Libraries Extra is not available at the libraries respondents use most often (namely, Jubilee and Hove).

Safety and comfort concerns about being in an unstaffed library were raised by several respondents and were more likely to be raised amongst older respondents or those living with a disability.

Older respondents were more likely to report that they prefer to visit the library on staffed days. As well as citing safety as a reason for this, they also expressed concern for the impact on staff employment and the loss of the social/community aspect of libraries.

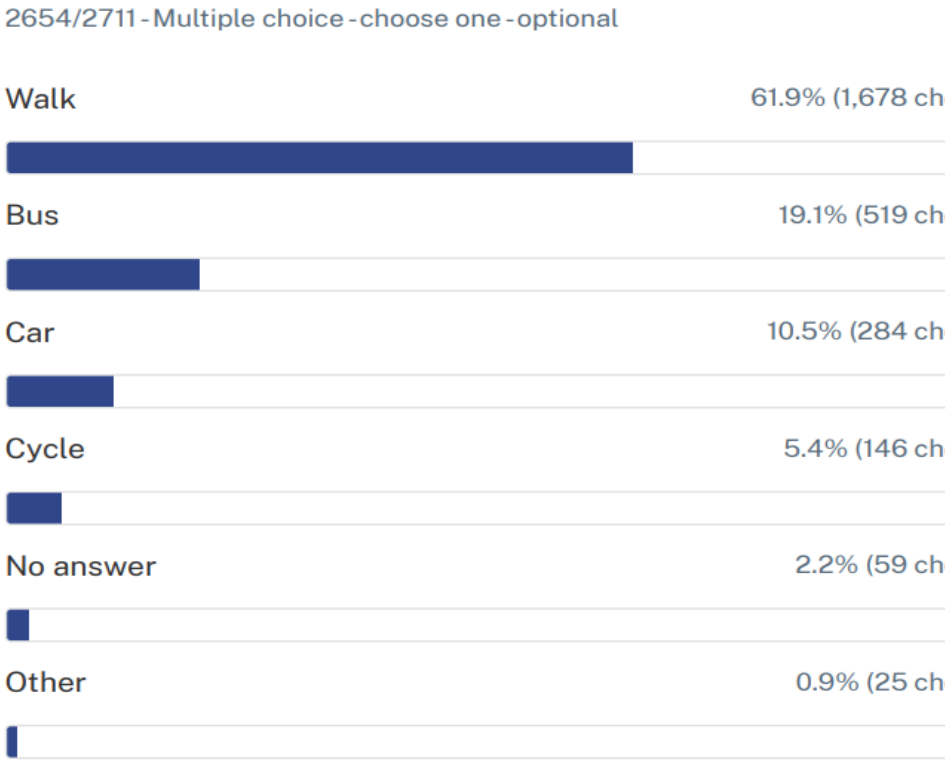
Those respondents who do use Libraries Extra expressed that they find it useful but even among respondents who are users, there can still be a preference for staffed hours.

This valuable insight helps us better plan, promote and manage the Libraries Extra part of the library service provision,

especially where it is given as potential mitigations to the impact of library service reductions.

Part 1 of the analysis had little data on how people travel to libraries in the city, so the public consultation was a useful opportunity to understand that better.

We asked survey respondents to tell us how they normally travel to the library they use the most.



The majority of those who chose 'other' travel by train. A few respondents travel by wheelchair, mobility scooter or taxi.

This tells us that walking to a library appears to be an intrinsic part of using a library service in person for many, under the current arrangements. It doesn't tell us why people use that form of transport, however with the answers provided about why people cannot travel to an alternative library we get a good picture of why many people walk. This is an important insight for thinking about the proposals, their potential impacts and any necessary mitigating actions.

During the consultation period we extracted some further data on PC usage at the three libraries we consulted on for closure.

PC usage for the financial year 24/25:

Library	**Children's PCs – total hours used**	**Main library PCs total hours used**	**Combined total**	**Total % of entire library opening hours (including Libraries Extra)**
Hollingbury	26:15	134:49	161:04	2.28%
Rottingdean	179:43	577:05	756:48	9:45%
Westdene	54:06	217:51	271:57	2:53%

This shows a variance in use, just across 3 community libraries and helps give further insight into community needs and uses.

5b Understanding of community profiles and assessment of need

Geographical communities

Part 1 of the needs and use analysis provided in July 2025 details known published data on the geographical communities around the city libraries.

Library use varies significantly by branch location. As found above, the consultation responses indicate that some branches, such as Westdene, have a higher proportion of users who rely solely on their local library, while others, like Hollingbury, have more users who also use other branches.

Proximity appears to be a key factor in library usage. Many respondents reported visiting libraries that are closest to their homes, with walking and public transport being the main modes of travel. This came up in the public meetings held around Rottingdean and Westdene Libraries too.

Accessibility concerns can be linked with geography. Users with mobility challenges, disabilities, or caring responsibilities emphasised the importance of having a local branch within easy reach, as travelling further can be difficult or impossible for some. Some areas of the city have a challenging environment for some e.g. with steep hills and busy roads in between one library and the nearest alternative.

School links influence geographical patterns. Libraries located near schools were particularly valued for the potential for after-school visits and educational activities, making their location central to some family routines.

Some community libraries serve as informal community hubs for specific neighbourhoods. Local libraries can be seen as safe, inclusive spaces for social interaction, especially in areas that may be lacking other community facilities.

Communities of interest and identity

Age

- Children and Young People: Many parents and carers who responded to the survey, contacted the council directly or attended public meetings described libraries as essential for children's literacy and development, offering access to books they could not otherwise afford and providing educational activities. School links were highlighted as important, and libraries located in close proximity to schools are especially valued. There was particular concern that closures could disrupt after-school routines and reduce opportunities for learning and socialisation. It was reported that many felt that libraries are crucial for children's literacy, education, and social development. School partnerships and proximity to schools are highly valued, with Westdene Primary School's classes visiting the library regularly. Concerns were raised that the closure of some community libraries could disrupt family routines and reduce access to books

and educational activities. Concerns were also raised about the risk to children of excessive time spent on smart phones and other digital devices. It was reported by some that access to a community library or evening / weekend access to a central library could help minimise smart device use.

- Older People: Many older respondents highlighted their vulnerability to digital exclusion and social isolation. Libraries were described by some as crucial for maintaining social connections and accessing information, especially for those living alone or with limited mobility. Older respondents highlighted difficulties with public transport and the importance of accessible, local facilities. Many older people were heard during the consultation process, both through paper and digital survey responses and through public meetings.

Disability

- Some respondents living with disabilities expressed concerns about accessing alternative libraries, citing challenges with public transport and the physical difficulty of carrying books. Libraries were valued for their accessible public toilets and as quiet, local spaces. There was concern that closures or reduced hours would increase barriers and potential distress for disabled and neurodivergent users. It was stated that alternative provision would need to be accessible and inclusive.

Sex, Gender Identity, and Sexual Orientation

- Libraries were described as safe havens for some LGBTQ+ people and women—places where they feel welcome and can access relevant resources. Several respondents mentioned the importance of libraries as neutral spaces for community cohesion and integration and the importance of this to those groups.

Race and Ethnicity

- Several Black and Racially Minoritised respondents emphasised that libraries feel like important, safe, and inclusive spaces, especially for those who may be facing digital exclusion, low income, or social isolation. They highlighted the importance of libraries for children's literacy, community connection, and access to resources that may not be available at home. Concerns were raised about the impact of closures or reduced hours on vulnerable groups, including those with intersectional needs around disabilities and caring responsibilities. Some respondents stressed that libraries support good mental health, can provide opportunities for learning, and help bridge inequalities.

Religion and Belief

- Libraries were described as inclusive spaces for people of all faiths and beliefs, including those with no particular religion. The equalities monitoring section of the survey

captured a range of religious backgrounds among respondents, highlighting the diversity of library users.

Caring Responsibilities

- Many respondents highlighted the importance of libraries for carers and those with caring responsibilities, noting that libraries provide respite, support, and access to resources for both carers and those they care for. A loss of local library provision could reduce access to these essential services, especially for those who are carers.

Low Income and Digital Exclusion

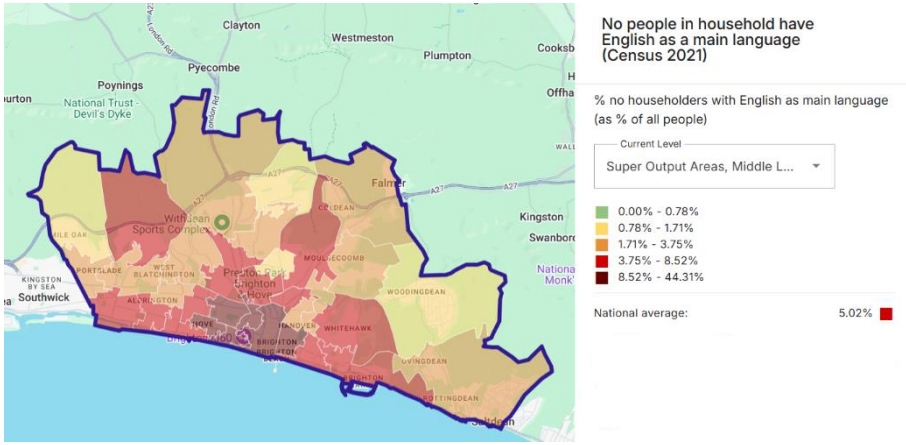
- Libraries were described as essential for low-income families and those experiencing digital exclusion, providing free access to books, computers, and the internet. There was concern that closures would exacerbate inequality and reduce opportunities for job-seeking, benefits access, homework, and administrative tasks. Concerns were raised about how closure or reduced hours could exacerbate inequality; alternative provision should maintain free access and digital support.

Refugees, asylum seekers and migrants

- Libraries were also described as important for refugees, asylum seekers, and migrants, offering a welcoming environment and access to information and support.

Those with English as a main language

- In order to further understand the ranges of needs across Brighton & Hove and across different communities we've also looked at where there are no people in a household with English as a main language. Information gathered from the 2021 Census is shown below. This shows us that the central city area has a higher mix of households where there are no people with English as a main language. Areas where library closures are proposed have lower rates of households were no people have English as a main language.



Communities less heard

The survey included optional equalities monitoring questions, with 59% of respondents providing information. The data showed a range of ages, ethnicities, religions, sexual orientations, and caring responsibilities among respondents, partially reflecting the diversity of library users in Brighton & Hove.

Efforts were made during the consultation to make it more accessible to a wider range of city residents and actual or potential library users. This included writing directly to dozens of community organisations asking them to share details about the proposals and how to engage with the consultation to their networks.

Within the library service some areas of demographic data are not collected or held about service users, for example those who are Black or Racially Minoritised. The survey therefore was a good opportunity to collect this data.

During the consultation, efforts were made to ensure Black and Racially Minoritised communities were able to engage, recognising that these groups were initially underrepresented in responses. Additional marketing and outreach were undertaken to improve representation. At the conclusion, 12% of respondents (an increase from 6% at consultation midpoint) identified as being from a Black or Racially Minoritised background, compared to 26% of the city's population (Census 2021).

Assessment of need around proposals for specific libraries

Hollingbury

Many respondents highlighted their strong opposition to the proposed closure – 54% respondents 'strongly disagree' while a further 13% 'tend to disagree' - emphasising their view of Hollingbury Library's role as part of a community hub, especially for children and low-income families. Many stated that they and their families would have no other way to access books if the library closed, due to the expense of bus travel to alternatives and the challenging terrain for walking with children.

Concerns were raised about the impact on those living with disabilities and families who rely on the library as part of their daily routine, particularly after school. Respondents noted that public transport costs and limited parking at alternative libraries could create barriers for people using them.

Westdene

58% of respondents strongly disagree with the closure of Westdene Library while a further 11% 'tend to disagree with it', emphasising its role as a community hub, particularly for children at the neighbouring school, the elderly, disabled people, and those without easy access to transport. Many stated that Patcham Library is not a viable alternative due to distance and poor transport links.

Respondents highlighted that the library's proximity to Westdene Primary School makes it especially valuable for families and children, and that its closure would disproportionately affect those who rely on walking or public transport. The lack of alternative accessible community spaces in the area was also a recurring concern.

Rottingdean

62% of respondents 'strongly disagree' with the proposed closure while 12% 'tend to disagree', emphasising the library's importance for education, literacy, social connection, and as a

safe, free public space. Many highlighted that they felt that closure would disproportionately impact those unable to travel to alternatives, such as the elderly, disabled, and families with young children.

Several respondents noted that Saltdean Library, while mentioned as an alternative, is not easily accessible for many Rottingdean residents.

The library was described as a vital community hub, supporting not just reading and learning but also social inclusion and wellbeing.

Jubilee Library

Many respondents strongly disagreed with the proposal to reduce Jubilee Library's opening hours. 48% of respondents strongly disagree with plans to reduce opening hours on Monday evenings. 51% 'strongly disagree' with planned reduction on Sunday afternoons. They felt the library is always busy during these times and serves as a free, safe public space and community hub for all ages, including children, students, disabled people, and those facing social isolation or financial hardship.

There was emphasis on the importance of Sunday afternoons for families and weekday evenings for students and those seeking a warm and free space. Respondents noted that these are peak times for working people, students, and families.

Respondents highlighted the role of the library in supporting mental health, combating loneliness, and providing essential internet and computer access for those experiencing digital exclusion.

Hove Library

There was strong opposition to reducing Hove Library's opening hours, with many respondents stressing that current late openings and weekend hours are essential for people who work full-time, parents, students, and families. Many said that closing at 5pm or earlier would make the library inaccessible to anyone working standard hours, and that Saturday afternoons are a prime time for families to visit the library. 45% respondents 'strongly disagree' with plans to reduce opening hours on a Wednesday evening and 46% 'strongly disagree' with plans to reduce hours on a Saturday afternoon.

A minority of respondents accepted reduced hours as preferable to full closure – 9% agreeing with reduction in evening hours at Hove - but many suggested that if hours must be reduced, it would be better to cut hours on less busy weekdays rather than evenings or weekends.

Overarching understanding of need

Through both Needs and Use Analysis, the wider public consultation, plus the other documents referred to in Linked Documents, a range of needs in relation to the library service is well set out through both quantitative and qualitative data.

The city's libraries serve a diverse population, including children, families, older people, disabled residents, carers, and marginalised groups. Libraries are valued as safe, inclusive community spaces that provide access to books, digital resources, social interaction, and essential services.

The analysis demonstrates that proximity and accessibility to existing or alternative libraries is important, especially for those with mobility challenges, and that many users currently use their nearest local library, although for some that is just one of the libraries used. The consultation revealed that closures or reductions in service could present an impact on vulnerable groups, such as low-income families, disabled people, and those experiencing digital exclusion.

A case was also made for the importance of libraries for children's literacy, older people's social connections, and as welcoming spaces for LGBTQ+ communities, women, refugees, and migrants.

6. Reflection on the four key factors – need, use, geography and cost

Following the production of Part 1 of the needs and use analysis and having the immediate driver of the budget savings to achieve, the original proposals were identified through analysis four key factors – need, use, geography and cost.

Need Consideration of the needs of those who live, work, study and visit in the area.

Key demographic information was collated to create a picture of existing and potential needs from library and information services. The analysis considered variation in needs relating to social outcomes from area to area.

It is recognised that communities are not consistent or homogenous and within community areas there will be differences in need. However, the needs of residents and accessibility of services were key factors driving decisions for proposals for change.

Use Consideration of current, previous and projected use of existing library provision.

Usage data was collated and analysed to find trends in use and compare usage across sites.

While use does not necessarily correlate with need, it was recognised that changes at the most used sites would impact on a greater number of people. This was taken into account when considering proposals for change.

Geography Consideration of variation in geographical spread of libraries.

The spread and grouping of libraries across the city was considered. Public transport links, parking facilities and measures of car ownership were included, as well as a measure of miles between libraries. Transport links to central

libraries from communities were considered, as well as those between smaller, local libraries, as data showed that customers at Jubilee Library were travelling in from other locations.

This included analysis of the postcodes of active borrowers and how many of them used multiple libraries.

The availability of alternative library sites nearby was considered as part of the rationale for proposals for change.

Cost Consideration of the cost of delivering services and savings required

The cost of delivering services was measured and included but was not limited to staff salaries, cleaning and security costs. Some costs were not included; the book fund was not considered for reduction as the intention would be to reallocate stock to other libraries to support changes in use i.e. if a library were to close, the stock could be moved to the nearby alternative libraries to allow users access to the same volume and variety of stock, albeit from a different site.

The balance of different factors was considered when making and agreeing proposals for change. It is understood that reducing hours at the central libraries necessarily affects the greatest number of people. However, the number of staff needed for those sites is far higher, so any reduction in hours would achieve a greater saving. Community libraries have much lower running costs than central libraries, and closure of these sites impacts on less individuals.

The analysis of need, use, geography and cost identified which libraries were of highest priority for the city to maintain and promote, based on the needs of the areas they serve, giving appropriate weight and consideration to each of the elements considered. Certain libraries were identified as priorities in order to support those areas at most risk of disadvantage.

The proposals for change that were consulted on in July – October 2025 were developed with consideration of balancing these factors..

The fuller details of what we heard during the public consultation is in the summary report, referred to in the Linked Documents section.
Following the public consultation and the compiling of this Part 2 analysis each proposal was reconsidered and the factors of needs, use, geography and cost reassessed in light of insights received. This is detailed further in the report to Cabinet listed in the Linked Documents section.

It is the council's view that on balance, the revised and final proposals continue to support the rationale of protecting services in areas of greatest need. The data gathered through the extended Needs & Use Analysis, and the additional data from the public consultation, continues to support the original proposals for the closure of Westdene and Hollingbury Libraries and the reduction in hours at Hove and Jubilee Libraries.

However, is it proposed that the library in Rottingdean is retained while options for alternative community-based

provision are explored with partners. The savings which could be achieved through closure of the library are relatively moderate and, on balance, the retention of the service while alternative options for community involvement are explored can be maintained whilst still achieving the majority of the overall saving for the Library Service.

According to the Libraries Basic Dataset 2023 from Arts Council England, Brighton & Hove City Council currently offers more library provision per resident than average across the country. Consideration was given to the travel times and convenience of library location; currently there are clusters, particularly in the east and north of the city, with multiple libraries within 3 miles of each other.

Were the proposal to reduce the city's libraries from thirteen to eleven to be taken forward, the city would still have more libraries per resident than the national average with a reasonable geographic spread.

Whilst it is recognised that any proposals to reduce services will affect some residents, most people will be able to access a comprehensive library service at the 11 remaining libraries, online and through the Home Delivery Service. Customers may need to alter their current usage habits and some will need to travel further, but the range of provision is still reasonably accessible.

7. Assessment on impact of proposals plus mitigations

The Linked Documents refer to a full Equalities Impact Assessment written after the production of Part 1 of the analysis and after the public consultation. This provides detail and insight into the potential impacts of the proposals.

Summary of the impacts that have been identified

Impact on vulnerable groups: The assessment finds that proposed library closures and reduced opening hours could impact certain groups, including:

- Children and young people (especially from low-income families, those with special educational needs, and those without access to books or digital resources at home)
- Older adults (risk of increased social isolation and reduced access to community hubs)
- Disabled people (barriers to travel, digital exclusion, and loss of accessible, inclusive spaces)
- Black and Racially Minoritised communities, migrants, refugees, and those for whom English is not a first language (loss of inclusive, culturally relevant spaces and resources)
- Carers, people experiencing socio-economic disadvantage, and those at risk of homelessness (loss of free, warm, safe spaces and digital access)

- LGBTQ+ individuals and those with diverse gender identities (loss of safe, inclusive environments)

The EIA highlights that individuals with multiple protected characteristics (e.g., age + disability + low income) may experience compounded negative effects.

Main mitigating actions proposed within the assessment

Accessible Communication: Ensure all information about changes (closures, reduced hours) is provided in accessible formats (plain English, multiple languages, Easy Read, Braille, etc.) and channels, so all affected groups are informed and supported.

Targeted Engagement and Support: Continue proactive outreach to vulnerable and underrepresented groups (older people, disabled residents, carers, minority ethnic communities, migrants, those experiencing poverty) to help them adapt to changes and signpost alternative resources.

Alternative Access and Services: Promote and expand services such as:

- Home Delivery Service for those unable to visit libraries
- Digital library resources (eBooks, audiobooks, online support)
- Libraries Extra (extended access to alternative libraries)
- Publicise alternative “warm spaces” and community venues

Monitoring and Review: Systematically monitor the impact of changes on protected and vulnerable groups, using ongoing feedback and data to adjust mitigations as needed. Findings will be reported to decision-makers for accountability.

Staff Training and Inclusive Practice: Ensure staff are trained to support diverse needs, maintain safe and inclusive spaces, and signpost to relevant local services.

8. How this links to wider strategy and sustainability work

The current Libraries Strategy expires at the end of 2025 and a new strategy will be launched in 2026, developing the longer-term plan for libraries including post Jubilee Library PFI contract arrangements in 2029. The extensive work and inputs gathered throughout the change management process this year all provide valuable contributions to the development of the new strategy.

Here are some of the ways this process will inform the new strategy – which will have a continued focus on the longer-term sustainability of the library service in the city.

- **Importance of evidence-based, inclusive decision-making.** Part 1 and Part 2 of the Needs and Use Analysis plus the Summary of Consultation Responses document demonstrate the importance of using both

quantitative data (usage statistics, demographic analysis) and qualitative feedback (public consultation, community engagement) to ensure that any changes to library services are well informed and considered. It also ensures changes are lawful, fair, and effective. This approach should be embedded in the longer-term strategy to ensure decisions are transparent, inclusive, and responsive to local needs.

- **Understanding diverse community needs.** The analysis highlights the varied needs of different user groups—children, families, older people, disabled residents, low-income households, and marginalised communities. A successful and comprehensive future strategy must recognise these differences, ensuring that library services remain accessible and relevant to all, especially those most at risk of exclusion.

- **Balancing different factors such as accessibility, geography, and cost.** Insights into how people use libraries (e.g., reliance on local branches, travel barriers, importance of proximity) can guide decisions about the location, opening hours, and types of services offered, while also considering financial sustainability.

- **Mitigating negative impacts.** The Equalities Impact Assessment and consultation responses identify potential adverse effects of service reductions or closures. The strategy should include robust mitigation measures to any future service changes—such as enhanced communication, targeted outreach, alternative access (e.g., Home Delivery, digital resources), and ongoing monitoring—to support those most affected.

- **Exploring and considering alternative models.** Feedback from the consultation suggests there is interest in alternative delivery models, such as volunteer-led services, community partnerships and expanded digital and volunteering offers. The strategy can explore the viability of some of these models to increase resilience, flexibility, and potentially of community partnership in delivery of library services.

- **Continuous engagement.** The process described in this document—phased analysis, consultation, and ongoing review—shows the value of continuous engagement with residents and stakeholders. The longer-term strategy should commit to regular consultation, data collection, and willingness to adapt approaches based on feedback and changing needs.

- **Linking to wider city strategies.** This analysis notes the importance of aligning library strategy with broader council goals, such as social inclusion, digital transformation, sustainability, and community wellbeing. Libraries can play a key role in delivering these wider

objectives, and the strategy should make these connections explicit and sustainable.

The insights from these needs and use analyses provide a robust foundation for a longer-term library strategy that is evidence-based, community-focused, and adaptable. Libraries need to remain vital, sustainable, and responsive to the evolving needs of all residents and service users.

9. Alternative models

Throughout the consultation much was heard about potential alternative models – as a way of avoiding or mitigating potential closure or reductions in opening hours. Suggestions are fully explored elsewhere within the Linked Documents referred to below, but they include:

- Expanding the use of volunteers
- Expanding use of non-staffed Libraries Extra days
- Considering transfer to a community run provision
- Reinstating mobile library services
- Finding another provider to run the libraries
- Partnering with local community spaces to host community book collection points
- Seeking alternative funding sources such as sponsorships or grants
- Considering reduction of hours at other libraries
- Removing the savings targets and reallocating to a different council budget
- Increasing council tax or parking charges

Some models are more practicable to deliver on than others. Some require a greater commitment from those outside of the city council, often including members of the local communities around the libraries. Some models are not viable to take forward and some require greater exploration.

In reaching the final proposals presented to Cabinet in December 2025 there is a commitment to exploring alternative models further, in the short, medium and longer term.

Any significant changes to library provision in the future would be subject to a public consultation process and the council would still need to meet its statutory duty in providing a comprehensive and efficient library service.

10. Conclusions and next steps

The Needs and Use Analysis (Part 1 and 2), informed by both quantitative data and extensive public consultation, demonstrates that Brighton & Hove's libraries are highly valued by a diverse cross-section of the communities that live, work and visit in the city. Libraries are seen as key for enhancing literacy, digital inclusion and for social connection particularly for children, older people, disabled residents, low-income families, and marginalised groups.

The analysis confirms that while changes to provision are necessary and appropriate to ensure long-term sustainability,

these must be carefully balanced to maintain accessibility, inclusivity, and statutory obligations.

The consultation has also highlighted the importance of proximity, flexible service models, and the need for robust mitigation measures to support those most affected by any changes. The process has reinforced the value of continuous engagement, evidence-based decision-making, and alignment with wider city strategies.

Next Steps

- Finalise and communicate decisions:
  Present the final proposals to Cabinet in December 2025 ensuring that all decisions are clearly communicated to the public and stakeholders in accessible formats.

- Implement approved changes:
  Officers to decommission sites for closure and complete staff consultation on changes to rotas and reductions in staffing.

- Monitor and review impact:
  Establish a system for ongoing monitoring of the impact of changes, particularly on vulnerable and protected groups, and report findings to decision-makers for accountability.

- Engage with and support affected groups:
  Continue proactive outreach to those most affected, including targeted support and signposting to alternative resources.

- Promote and expand alternative services:
  Enhance awareness and uptake of Home Delivery, digital resources, and Libraries Extra.
  Publicise alternative “warm spaces” and community venues.

- Staff training and inclusive practice:
  Ensure staff training continues to support diverse needs and maintain safe, inclusive spaces

- Prepare for future strategy development:
  Use the insights and evidence gathered to inform the development of a new library strategy in 2026, ensuring ongoing consultation and adaptability to changing needs.

11. Linked documents and key contacts

July 2025 Cabinet papers : Brighton & Hove City Council - Agenda item - Library Sustainability Plan

- particularly Needs and Use Analysis Part 1

December 2025 Cabinet papers: Brighton & Hove City Council - Agenda for Cabinet on Thursday, 11th December, 2025, 2.00pm

- Summary of consultation responses
- Equalities Impact Assessment
- Cover report for Cabinet

General Equality Impact Assessment (EIA) Form

1. Assessment details

Name of activity or proposal being assessed:	**Proposed closure of some community libraries and a reduction in opening hours at Jubilee and Hove Libraries – Cabinet 11 December 2025**
Directorate:	Families, Children and Wellbeing
Service:	Library Service
Team:	Senior Leadership Team
Is this a new or existing activity?	New
Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)	Yes – Budget EIA that went to Budget Council February 2025 Appendix 7 - Equality Impacts Assessments.pdf (budget proposal 2) Yes – EIA that went to Cabinet in July 2025 to seek approval to commence a public consultation General Equality Impact Assessment (EIA) Form Libraries public consultation

2. Contributors to the assessment

Responsible Lead Officer:	Anna Gianfrancesco – Director of Commissioning and Communities
Accountable Manager:	Ceris Howard – Head of Library and Customer
Additional stakeholders collaborating or contributing to this assessment:	Carolyn Bristow – Service Manager for Policy for Families, Children and Wellbeing

3. About the activity

Briefly describe the purpose of the activity being assessed:

In July 2025, Cabinet agreed to undertake a Public Consultation into the following proposals.

- closure of Hollingbury Library
- closure of Rottingdean Library
- closure of Westdene Library
- changes in opening hours at Hove Library
- changes in opening hours at Jubilee Library

The public consultation ran for 12 weeks from 18 July to 10 October 2025.

This consultation process included a survey (digital and paper versions available), public meetings and drop-in sessions, email correspondence, and meetings with local community groups and stakeholders.

The consultation was well responded to by a wide range of library users, visitors to the city and other stakeholders. We heard from 1000s of people through the survey form and from 100s of people via online and face to face public meetings. There was also an email address where people could email in their views. Many views were shared on the value of libraries within the city and how they meet community needs in a wide range of ways.

The responses to the consultation have been read, considered and analysed by council officers.

Following the public consultation July-October 2025 and the response analysis which followed, the following proposals are being made to Cabinet in December 2025. The full background and context can be found in the accompanying Cabinet paper - Brighton & Hove City Council - Agenda for Cabinet on Thursday, 11th December, 2025, 2.00pm

Recommendations to Cabinet:

- That having considered the information provided in this report and its appendices, Cabinet agrees to make the following changes to existing library provision, being satisfied that its remaining provision complies with its statutory obligation to provide a comprehensive and efficient library service
  - Cabinet agrees to reduce opening hours at Jubilee Library by 5 hours/week on Monday evenings and Sunday afternoons from 1st April 2026
  - Cabinet agrees to reduce opening hours at Hove Library by 5 hours/week on Wednesday evenings and Saturday afternoons from 1st April 2026
  - Cabinet agrees to close Hollingbury Library on 31st March 2026 and notes that officers will work with partners in exploring alternative options for future community based provision;
  - Cabinet agrees to continue the existing library provision in Rottingdean with a further report to be brought back to Cabinet in 12 months to review the outcome of work with community partners;
  - Cabinet agrees to close Westdene Library on 31st March 2026 and notes that officers will work with partners in exploring alternative options for future community based provision;
- That Cabinet delegates authority to the Corporate Director for Families, Children and Wellbeing, working in consultation with the Cabinet Member for Sport & Leisure, to take all steps necessary or incidental to the delivery of the recommendations in paras 2.1.1 to 2.1.5 inclusive.

The main change to the recommendations, further to those that were proposed in July, is that the original proposals include closing Rottingdean Library. The recommendation now is to keep the library open with a review in 12 months' time.

What are the desired outcomes of the activity?

To ensure that within its decision making at Cabinet in December 2025, Councillors ensure there remains a comprehensive and efficient library service which also meets our public Sector Equality Duty within the Equality Act 2010. The purpose of the EIA is to ensure they are appropriately sighted on a wide range of implications that have been informed by the public

consultation and to consider them and their mitigations, as presented within this assessment and the accompanying Cabinet report.

An EIA was conducted late last year on the original budget proposals. An EIA was conducted earlier this year to support the design and delivery of the public consultation process. Both of those have informed this assessment.

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

- Library users
- City residents
- Visitors to the city including those who work, look for work and those who study in the city

Staff within the council's library service are an essential and significant stakeholder in this process. They have had specific mechanisms to engage with and contribute to the public consultations. If changes are confirmed to be made to the library service, staff will then have a separate staff consultation. Equalities implications for staff members will be considered as part of that and a separate EIA prepared.

4. Consultation and engagement

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

Following Cabinet in July 2025, a public consultation was held on the following recommendations:

- Consult on the proposed closure of Hollingbury Library
- Consult on the proposed closure of Rottingdean Library
- Consult on the proposed closure of Westdene Library
- Consult on the proposed changes in opening hours at Hove Library
- Consult on the proposed changes in opening hours at Jubilee Library

The consultation ran for a period of 12 weeks from 18 July - 10 October 2025. The consultation included:

- A survey open to anyone, hosted on the council's YourVoice platform, open from 18 July until 10 October 2025. The survey was available online and in paper format from libraries.
- 2 publicly advertised online consultation meetings held in July and October.
- 3 drop-in sessions at Hollingbury, Rottingdean and Westdene Libraries
- 4 in-person consultation meetings spread throughout the time period - 2 planned for Jubilee Library and Hove Town Hall, 2 added in response to high levels of interest at Westdene Primary School (on the same site as Westdene Library) and St Margaret's C of E Primary School (near to Rottingdean Library).

- There was a general email address available for questions and representations – libraries.consultation@brighton-hove.gov.uk plus residents submitted Member enquiries and enquiries to the Customer Feedback Team. During the consultation, a number of FOI requests were also made.

- A Young People's Guide and an Easy Read Guide to the consultation were created and made available on the Your Voice platform alongside the survey and proposal documents. The availability of the information in accessible formats was also promoted.

- Pre-consultation, our analysis made us aware of the particular importance of reaching seldom heard or marginalised groups, exploring all available options to make consultation documents and communications fully accessible for disabled people, those with access requirements, different literacy or language requirements and non-digital engagement for those who are digitally excluded. We targeted communications about the consultation with a wide range of community groups and networks, to reach as many residents and visitors as possible. We have also analysed our consultation feedback/data intersectionally where possible.

- Library staff at several levels will be affected by the proposals and a consultation with over 60 colleagues is likely to be required, once the public consultation has closed and decisions have been made, likely to be early 2026. However, during the public consultation, internal work was undertaken to inform and engage with staff on the proposals.

5. Current data and impact monitoring

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

(State Yes, No, Not Applicable as appropriate)

Age	YES
Disability and inclusive adjustments, coverage under equality act and not	YES
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	YES
Religion, Belief, Spirituality, Faith, or Atheism	YES
Gender Identity and Sex (including non-binary and Intersex people)	YES
Gender Reassignment	YES
Sexual Orientation	YES
Marriage and Civil Partnership	YES
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	YES
Armed Forces Personnel, their families, and Veterans	YES
Expatriates, Migrants, Asylum Seekers, and Refugees	YES
Carers	YES
Looked after children, Care Leavers, Care and fostering experienced people	YES

Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	YES
Socio-economic Disadvantage	YES
Homelessness and associated risk and vulnerability	YES
Human Rights	NO
People on a low income and people living in the most deprived areas	YES

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

A large number of stakeholders were contacted during the public consultation, comprising community groups and networks. They were provided with details of the proposals and the various ways people could respond to the consultation. This included stakeholders covering a wide range of communities, including those relevant to the list provided above, including groups for where we have more limited data sets including Brighton Womens Centre and Rise.

All responses to the public consultation have been considered, including where people have talked about personal circumstances and any intersectionality of their characteristics. The digital and paper survey also collected equalities monitoring data during the public consultation. We were also informed about personal and individual experiences via a number of public meetings where the proposals were presented and attendees had multiple opportunities to ask questions and share their views. During these discussions many personal experiences were shared with us covering a wide range of both protected characteristics plus wide factors impacting on people's lives. That has all contributed to this assessment.

Some data about library users is gathered by the Library Management System when customers join the library. Not all equalities data for protected characteristic and groups listed above are able to be covered through that system. The public consultation encouraged responders to provide equalities monitoring data as part of their response, so that the impact of the proposals can be considered appropriately.

The accompanying Part 2 of the required Needs and Use Analysis is also provided with this assessment in the report to December's Cabinet. This, alongside Part 1 of the analysis, details what other data sets are available in the city to consider the needs and use of city library services, including the impact of the proposals set out in the report.

Staff data is managed through BHCC HR systems.

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

The feedback received through the public consultation will be fully considered, available to Cabinet members who will be making the decisions on any resulting final proposals.

Data will be available on numbers of visitors and items loaned at libraries affected.

Feedback via comments and complaints.

This will be through direct communication, social media promotion and engagement with partners and stakeholders.

Formal consultation with staff, 1:1s, team meetings.

Data and feedback will be monitored by the Libraries Senior Management Team and reported to the Communities and Commissioning Director and Senior Leadership Team.

Public Consultation feedback has been read in full. Themes have been identified and presented to Councillors when they are considering next steps and any final decisions.

General known data about library use is presented in section 3 (current library use) of the Needs and Use Analysis Part 1, which was presented to Cabinet in July 2025.

6. Impacts

Please note:

- The sections below feature some direct quotes provided by responders to the public consultation. Where these may have contained clearly identifiable information these have been slightly modified, to protect the identity of those quoted. The sentiment and meaning of the quote has not been affected
- The analysis below features inclusion of comments made about the Rottingdean proposals. Despite this proposal no longer going forward in its original form, these comments and accompanying analysis have been left in as it informs the assessment.

6.1 Age

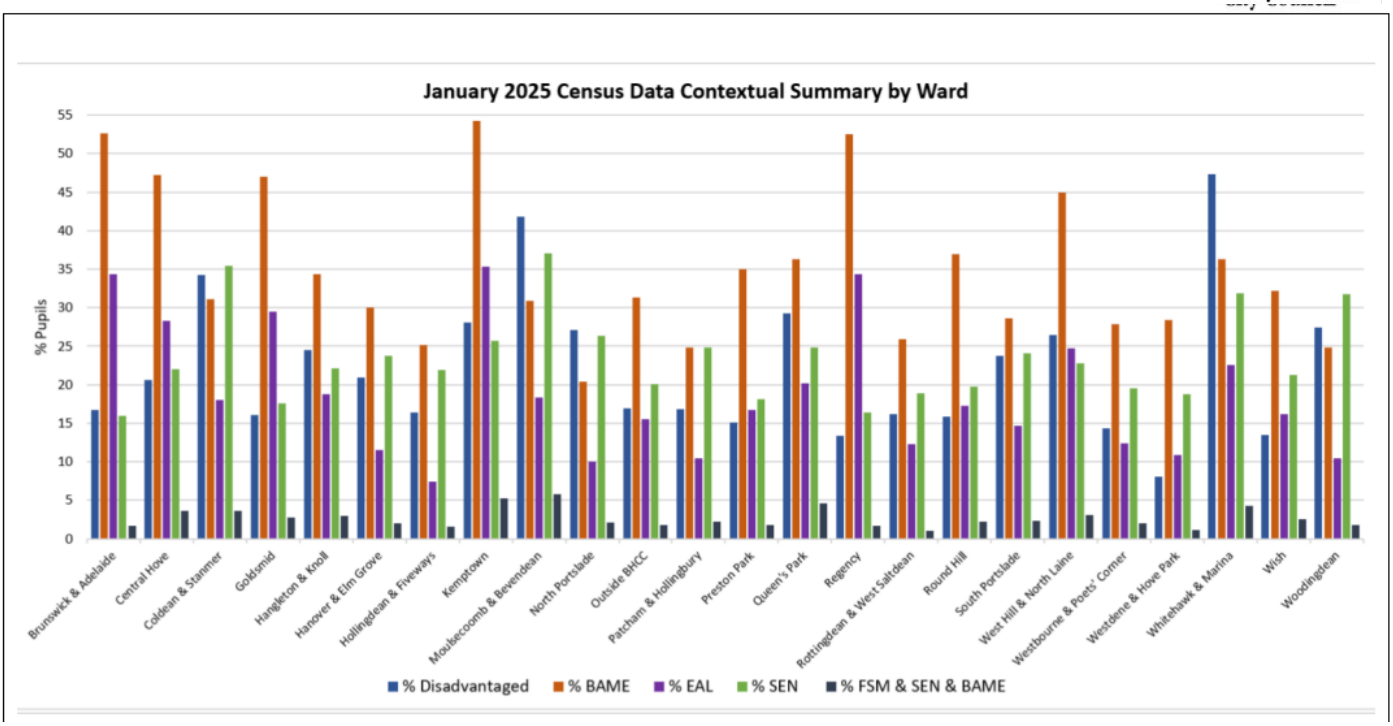
Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: people who may be housebound, those under 16, young adults, with other intersections.	YES

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

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

What we know about library use/children and young people/older people in the city and how any changes to library provision may impact on them:

At a 2023 population estimate there were 46,666 children and young people under 18 living in Brighton & Hove. The chart below provides data on school aged children, showing the range of demographic characteristics we see across the city. The chart details each ward in the city and provides information on the percentage of pupils within each ward who are disadvantaged, Black, Asian and Minority Ethnic group (DfE use this terminology), English as a Second language, special educational needs and how some children have more than one of those characteristics. This will be especially relevant for the wards where there are proposed closures but already recognising that residents/library users from across the city may be impacted by the proposed reduction in opening hours at the central libraries.



In 2023, the National Literacy Trust found that the percentage of children and young people aged 8 to 18 who said that they didn't have a book of their own at home increased compared with the year before, particularly for those from lower-income homes. In 2022 nearly 1 in 10 children receiving free school meals (FSMs) said they did not have a book of their own. Since then, that figure has risen to 1 in 8. Children who are on FSMs are twice as likely not to own a book as those who are not. In fact, the percentage-point (pp) gap in book ownership between children and young people who receive FSMs and their peers who do not is now at its largest in a decade.

The effects of our aging population are also among the biggest social challenges we will face over the coming decades, as a society, economically, and personally within our own families. There is evidence that libraries have a part to play in combatting social isolation. Brighton & Hove has a higher proportion of older people living in poverty compared to England and the South East.

The recent public consultation heard deeper and more actionable insight into the age of people using libraries. This then expands on the data we explored in part 1.

These new insights include:

- For those that were happy to provide their age when completing the survey, the distribution skews to working age adults and older adults. We therefore need to be mindful of hearing the views from young library users and may need to continue to develop mechanisms for doing that more consistently and successfully.
- This same reflection is also made for the ages of survey responders who told us about their library usage. Weekly and daily usage is highest in families and working-age adults but with older adults also showing strong routine usage.
- When looking at travel arrangements to the libraries, travel modes vary by age, with walking dominant for most groups; bus dependency increases among older adults; car/cycle use is more common among the 45–64 grouping. The data indicates that library location and appropriate transport availability is of greater importance to those who are older and / or less mobile.

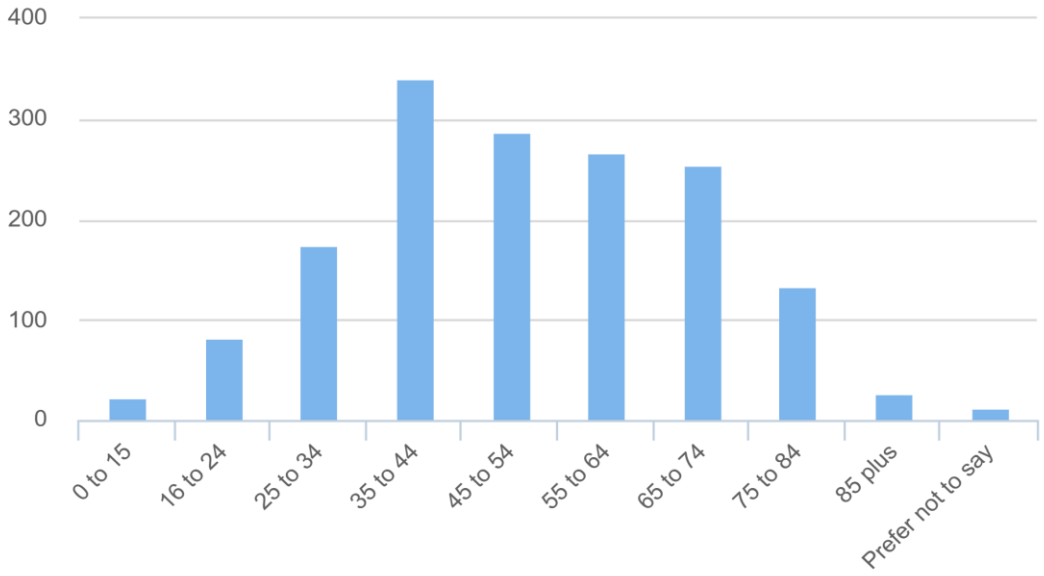
- Older people told us about potential barriers to using alternative libraries as being mobility, cost of travel, road safety and fatigue. Parents of young children talked about distance, availability of time and the cost of travel as being of concern. This enables us to consider that age intersecting with disability and / or caring responsibilities can present an impact/barrier to alternative library use.

Who we heard from during the consultation – related to age

The consultation was widely promoted through council platforms/social media accounts and local press. We also sent targeted information about the proposals and the consultation to a wide range of community groups and networks. This included groups supporting parents/carers of children and young people and groups that support older people in the city. A young person's guide to the consultation was provided on the YourVoice portal.

In the public consultation survey, responders were invited to share their equalities monitoring data. 59% of respondents shared monitoring information. We had 2711 completed survey submissions.

Here's what people told us about their age:



The image above displays the age ranges of people who responded to the survey – showing that the majority of respondents are between 35 and 74, with much smaller numbers of responses from those under 24 or over 85.

YourVoice, the council's engagement portal, is designed for people aged 13 and above, so it is not surprising that we heard from fewer people 15 and younger. We know that some adult responders provided their children's views on their behalf.

195 pages of letters and handmade posters from children at Westdene Primary School were written, scanned and shared by email to the consultation inbox as an attachment. In addition, 7 handmade posters were shared by children from Rottingdean.

Due to the demographics of the area of the city, the public meetings were well attended by residents aged 50 and over, so we know we heard from a significant number of people in that age group.

Efforts were made within Hove and Jubilee Libraries to encourage the young adults using the space for studying to respond to the consultation and in the last couple of weeks we heard from more users of Jubilee Library, we think partly as a result of that targeted encouragement.

This meant that we were able to hear the views of a wide range of ages for city residents and visitors to the libraries.

What we heard within the consultation process

Accessibility and Mobility

- Many older respondents and some of those who attended public meetings emphasised the importance of having a library within walking distance. For those with mobility issues, walking to a local library is manageable, but travelling further afield can be felt to not be feasible due to steep hills, long distances, or the need to cross busy roads or use multiple buses. Some responders said that for these reasons, if their local library closed, they would likely stop using library services altogether.

Social Isolation and Community

- Libraries were described by some as a “lifeline” for older people, providing not just access to books but also an important social hub. Some older respondents said the library is sometimes the only place they speak to someone all week. The closure of local libraries was seen by some as likely to increase social isolation and loneliness among the elderly.

Physical and Mental Health

- Several older people responding to the survey mentioned that the library helps them maintain their mental health and cognitive abilities. For some, it’s a place to keep their mind active, access information, and feel part of the community. The loss of a local library was described as likely to have a negative impact on both physical and mental wellbeing – this matter came up through survey responses and was raised a number of times within the public meetings.

Digital Exclusion

- There was concern expressed by some that not all older people are comfortable or able to use digital services. Libraries provide access to computers, the internet, and staff support, which are considered essential for those who do not have these facilities at home. Some respondents felt that digital exclusion would worsen if local libraries closed.

Intergenerational Impact

- Some respondents highlighted that libraries are used by all ages, but the impact of closure would be particularly severe for both the very young and the very old. Libraries were seen as places where older people can interact with younger generations, such as grandchildren, and where families can visit together. This came up both in the survey responses and in the public meetings.

Volunteering and Community Solutions

- Some older respondents expressed willingness to volunteer to help keep libraries open, but others noted that relying on volunteers is not a sustainable solution, especially as many potential volunteers are themselves elderly or have health issues.

Libraries as Essential for Early Literacy and Education

- Many survey respondents and people that attended the public meetings described libraries as important for fostering a love of reading and supporting literacy from an early age. Many parents, carers, and educators said that regular library visits help children develop reading skills, discover new genres, and access a wide range of books they could not otherwise afford.
- Libraries were seen by some as crucial for supporting homework, research, and independent study, especially for children and young people who may not have a quiet or suitable space at home.

Libraries as Safe, Inclusive, and Free Spaces for children and families

- Many families and young people described libraries as one of the few free, safe, and welcoming indoor spaces available to them, especially during bad weather or school holidays. Libraries were valued as places where children can read, play, attend events, and socialise without the pressure to spend money.
- Several respondents highlighted the importance of libraries for children with special educational needs, disabilities, or neurodivergent conditions, as libraries offer calm, structured, and supportive environments.

Access and Proximity Matter

- Some parents and carers stressed that having a library within walking distance is essential for regular use, especially with young children or for those without access to a car. The closure of local libraries was seen by some as likely to reduce library use dramatically among children and families, as travelling further afield is often impractical or unaffordable.
- Some noted that libraries attached to or near schools are particularly valuable, as they enable children to visit after school, with their class, or as part of school activities.

Libraries as Community Hubs

- Libraries were described as community hubs where children and young people can meet friends, participate in activities (e.g. Summer Reading Challenge, story time), and engage in cultural and educational pastimes. Many parents said that libraries help reduce isolation for both children and carers and provide opportunities for intergenerational connection.

Impact of Reductions and Closures

- Some respondents expressed strong concern that closing libraries or reducing hours would disproportionately affect children and young people, especially those from low-income families, those with disabilities, and those living in areas with fewer community resources.
- Some feared that reduced access to libraries would lead to lower literacy rates, less enthusiasm for reading, increased screen time, and greater social isolation among children and young people. Concerns about screen time were raised within the survey and multiple times at the public meetings.
- There was particular concern about the loss of after-school and weekend access, as these are the main times when children and families can visit libraries.

Some quotes from survey respondents, specifically related to age.

> “Libraries are a vital hub for older people to get out of the house, keep up with news, and socialise.”

"As an older person, having a library within walking distance is important to help me get over these limitations. Having to travel further would leave me very isolated."

"I am 94, cannot walk long distances, and struggle with the hills in the area. The library is where I meet people, feel part of the community, and use the internet to communicate with my family abroad. Losing it would affect my social life and connection to others."

"The closure of the library would have a significant impact upon my children's life chances given what we now know about the correlation between access to literature and positive outcomes. My mental health would also suffer owing to the fact that the library offers a space for social interactions for busy yet isolated parents."

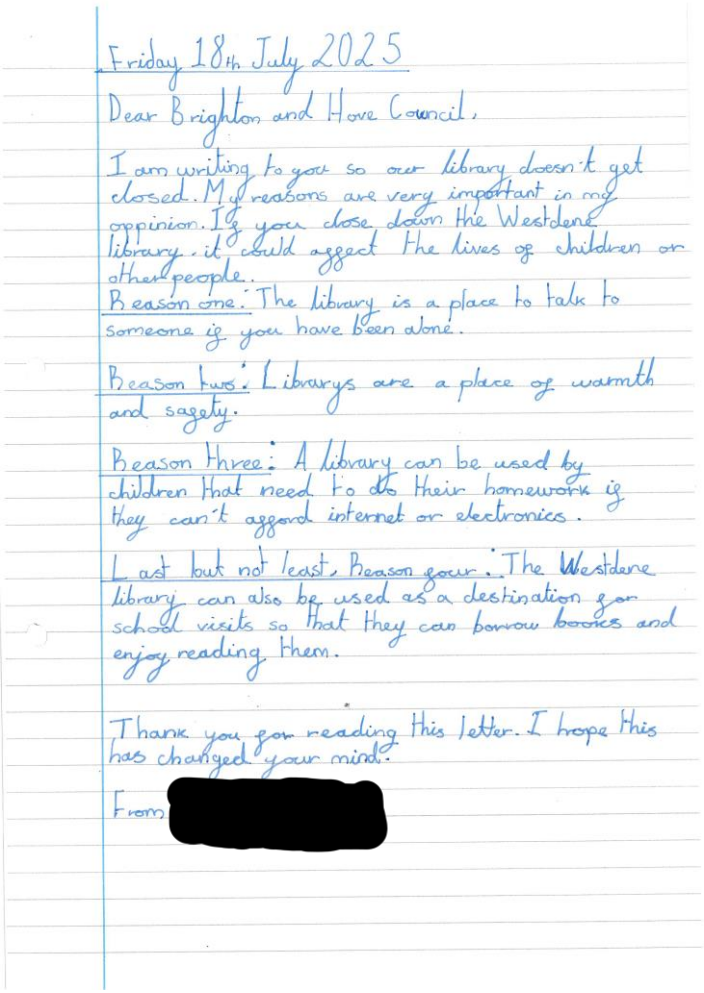
"Our young children spend so much time here we foster a love of reading there. The library is one of the few places people can go for free at the weekend. It is incredibly well used. Families are there all the time on a Sunday. Also it is one of the few places you can comfortably breastfeed for free and this will have a detrimental impact. "

"The library is a much loved asset and doesn't cost much to run each year. With a few funding ideas I hope it can be kept open as the local community would be devastated if it closed. As a working mum I have chosen to have Fridays with my pre-school children and prefer to use local services when possible. Closing the library would take away one of the few good indoor activities for kids in the area and rob them of a key educational and cultural resource."

We received a number of letters and posters from children attending Westdene School. These are available privately to Cabinet Members ahead of the decision meeting on 11 December, but here are a couple of examples to demonstrate how children have been able to express their views through the consultation process.


Badger's class
SAVE
Westene
Library


Our School uses this Library
SAVE
THE
LIBRARY!
please keep the LiBRary open
it's got my favrout books in it



Friday 18th July 2025

Dear Brighton and Hove Council,

I am writing to you so our library doesn't get closed. My reasons are very important in my opinion. If you close down the Westdene library, it could effect the lives of children or other people.

Reason one: The library is a place to talk to someone if you have been alone.

Reason two: Librarys are a place of warmth and sagety.

Reason three: A library can be used by children that need to do their homework if they can't afford internet or electronics.

Last but not least, Reason four: The Westdene library can also be used as a destination for school visits so that they can borrow books and enjoy reading them.

Thank you for reading this letter. I hope this has changed your mind.

From [redacted]

The images above show 2 posters and 1 letter provided by pupils at Westdene Primary School, opposing the proposed closure of Westdene Library.

Summary of potential impacts

- Children and Young People:
  - It was felt by some that CYP were likely to be disproportionately affected by library closures and reduced hours, especially those from disadvantaged backgrounds, those with special educational needs, and those without access to books or digital resources at home.
  - Impacts include loss of after-school study spaces, homework support, digital access, and safe, inclusive community spaces. Libraries are considered important for early literacy, education, and social connection.
- Older Adults:
  - Face increased risk of social isolation, loneliness, and reduced opportunities for social contact if local libraries close or centrally used libraries reduce their opening hours.
  - Many older people rely on libraries as accessible, walkable community hubs for mental stimulation, social interaction, and digital inclusion.

    - Those with mobility issues may find it difficult or impossible to travel to alternative libraries, especially if closures mean longer journeys or reliance on public transport.
- Working Age Adults
    - May experience reduced access to job search facilities, IT support, lifelong learning, and designated Warm Spaces in winter.

Mitigations against potential impacts

- Maintain seven-day access at Jubilee Library and through Libraries Extra to ensure continued availability for all age groups, especially those most affected by reduced access elsewhere.
- Promote access to alternative libraries by targeted communications with users at libraries proposed for closure and those who use Hove and Jubilee at the times the library is proposed to close, to ensure they know about the change in delivery and where the alternatives are
- Further campaigns promoting Libraries Extra – to ensure library users affected by closure or reduction in hours have the option of flexible access to alternative libraries
- Continue to prioritise children's offer within remaining libraries, including maintaining after-school study spaces and resources for homework support
- Ensure alternative local Warm Spaces are well promoted within all libraries
- Consider work with schools and colleges to ensure they are aware of any changes to library services and are aware that children and young people may lose access to local libraries
- For Westdene, explore potential with the school to provide books and online resources for the children's use
- Expansion and targeted promotion of Home Delivery Service to older people who may lose access to local libraries
- Further promotion of the library service's online offer of eBooks, eAudiobooks and online resources
- The areas where there are proposed closures are served by frequent bus routes. For Westdene the number 27 runs between Westdene and Saltdean, via the city centre but also passing bus stops where changes to other bus routes are provided. Hollingbury is well served by the number 46 route and several of the 5s – which enable connections and some direct routes to Patcham Library.

The image below (From Brighton & Hove Buses website) shows the bus routes in proximity to libraries proposed for closure and the alternative libraries. Libraries are shown in the black stars.



The image above is a screen shot from a page on the Brighton & Hove Buses website – detailed the main bus routes through the city centre. It also details the locations of a number of libraries (excluding Woodingdean, Rottingdean and Portslade) to show the proximity of libraries to regular bus routes.

6.2 Disability:

Does your analysis indicate a disproportionate impact relating to Disability, considering our anticipatory duty?	YES

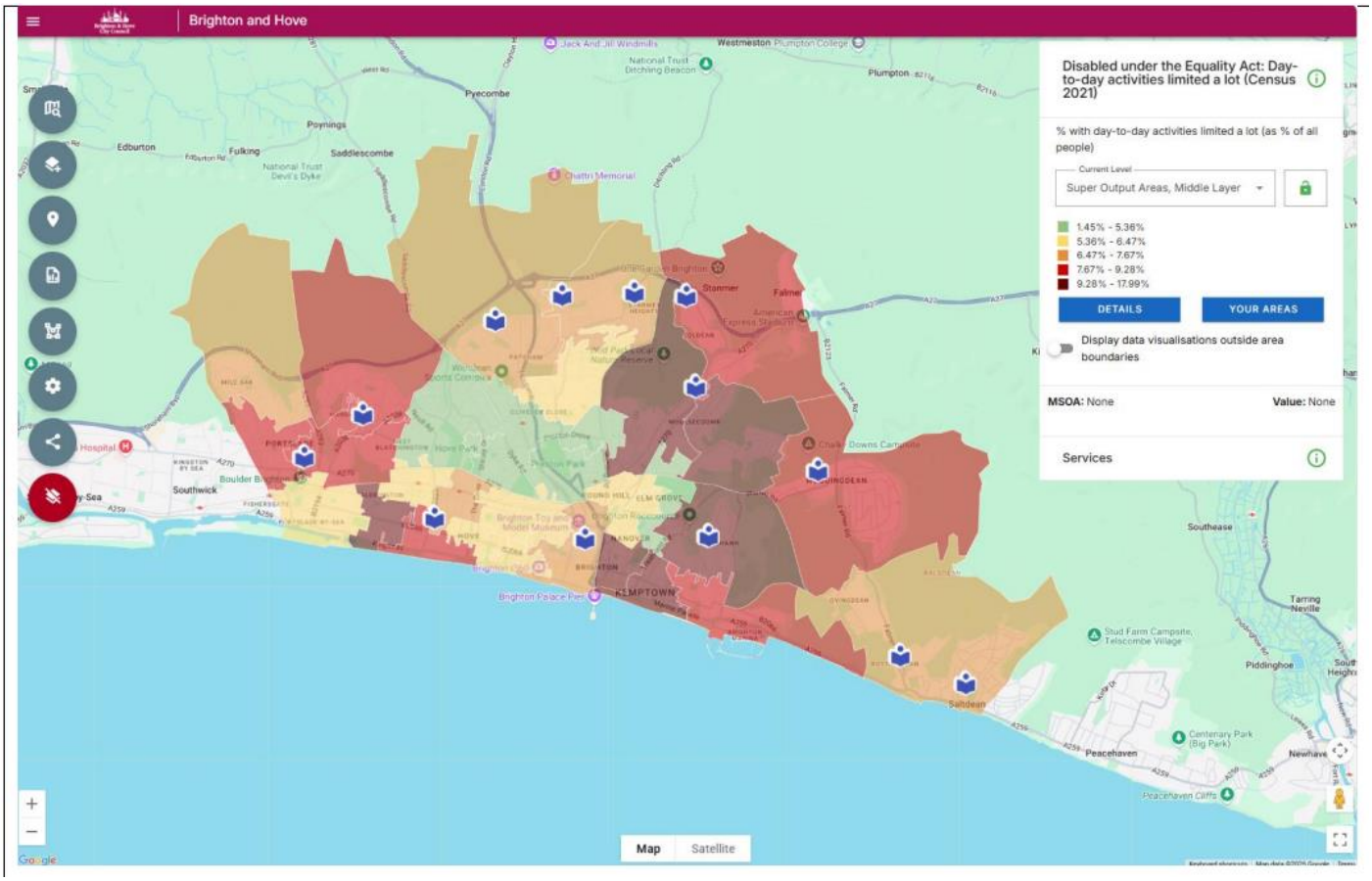
If "YES", what are the positive and negative disproportionate impacts?

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

What we know about library use/disabled people in the city and how any changes to library provision may impact on them:

Brighton & Hove has an aging population and a significant proportion of residents with long-term health conditions, mental health issues, or those who are disabled. Among disabled residents, for

two out of five (20,351, 39%) their day-to-day activities are limited ‘a lot’ and for three in five (31,446 people, 61%) their activities are limited ‘a little’. Both proportions are similar to what is seen in the South East and England. Over four out of five residents (225,306 people, 81%) are not disabled as defined by the Equality Act. This is lower than seen in both the South East (84%) and England (83%). Nearly three quarters of residents have no long term physical or mental health condition (74%). This is lower than seen in the South East (76%) and England (76%). Among residents who are not disabled, nearly one in ten (20,502 people, 8%) have a long term physical or mental health condition. However, this condition does not affect their day to day activities. This is similar to what is seen in both the South East (8%) and England (7%). Residents who are disabled under the Equality Act are concentrated in the central/eastern area of the city, particularly in East Brighton, Queens Park and Hollingbury & Stanmer wards. However, there are also higher proportions of disabled people in the east in Woodingdean and to the west in Hangleton & Portslade. This is shown in the image below.



The image above is a screen shot from the Local Insight website, detailing a map of the city and showing the percentages of residents who told the 2021 census that their day to day activities were limited a lot by being disabled. The data shown is at the middle layer of the super output areas. The image also details the location of the city libraries.

This shows us that in the areas where community libraries are proposed to close there are lower levels of disabled people. It also shows that there is a higher density of disabled residents near to Hove and Jubilee Libraries, where opening hours are proposed to reduce.

Ranking upper tier local authorities by the proportion of disabled residents shows that Brighton & Hove (19%) is ranked 51 out of 152 authorities (second quintile). Disabled customers may not be able to travel independently to access a library further from their home. They may also face additional costs through the increased travel, especially people who need to use a private vehicle for travel. Disabled households are already more likely to be under greater financial strain due lower income and greater household costs.

Disabled users could find Libraries Extra more challenging to use than staffed library services, so this being available in community libraries will have limited impact in areas where a library has closed and will not mitigate loss of opening hours in Jubilee and Hove libraries.

We also know that libraries support people to live healthier lives in a range of ways, including providing access to health information and Books on Prescription, hosting healthcare events and opportunities, delivering books to those who are housebound and addressing social isolation and loneliness. While overall life expectancy has risen in Brighton & Hove, healthy life expectancy has declined in recent years, meaning people are living longer but with more health issues. Additionally, the number of people with long-term health conditions or those who are disabled is increasing.

The recent public consultation provided a range of individual level responses and free text comments which inform this assessment and analysis.

- About 1 in 5 respondents to the survey reported that their day-to-day activities are limited by a health problem or disability (combining “Yes, a little” and “Yes, a lot”). This means that among those who answered, disability or long-term health conditions are a significant factor for library users.
- We heard that some community branches (e.g., Rottingdean, Portslade, Whitehawk, Woodingdean) have a higher share of users reporting a disability than some city-centre branches, however Jubilee and Hove do support some disabled users.
- The data reflects that disability often intersects with age (older adults), caring responsibilities and with those on a low income. This means it’s important to consider intersectional and cumulative impacts within mitigating actions.
- We heard that some disabled users rely on library computers and staff support for digital access, benefits, and health information.

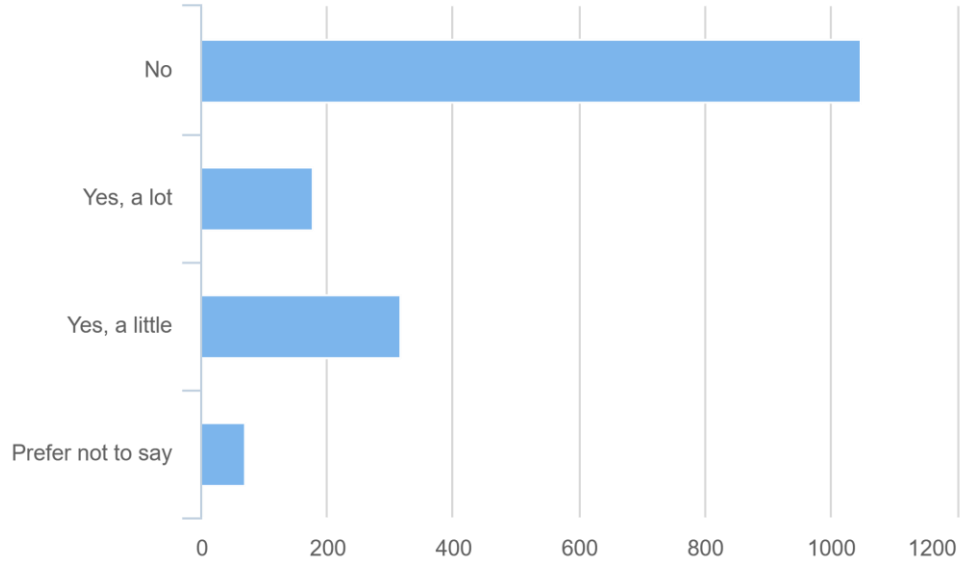
Who we heard from during the consultation – relating to health problems and disabilities

The consultation was widely promoted through council platforms/social media accounts and local press. We also sent targeted information about the proposals and the consultation to a wide range of community groups and networks. This included groups supporting parents/carers of disabled children and young people and groups that support disabled people in the city.

In the public consultation survey, responders were invited to share their equalities monitoring data. 59% of respondents shared monitoring information. We had 2711 completed survey submissions.

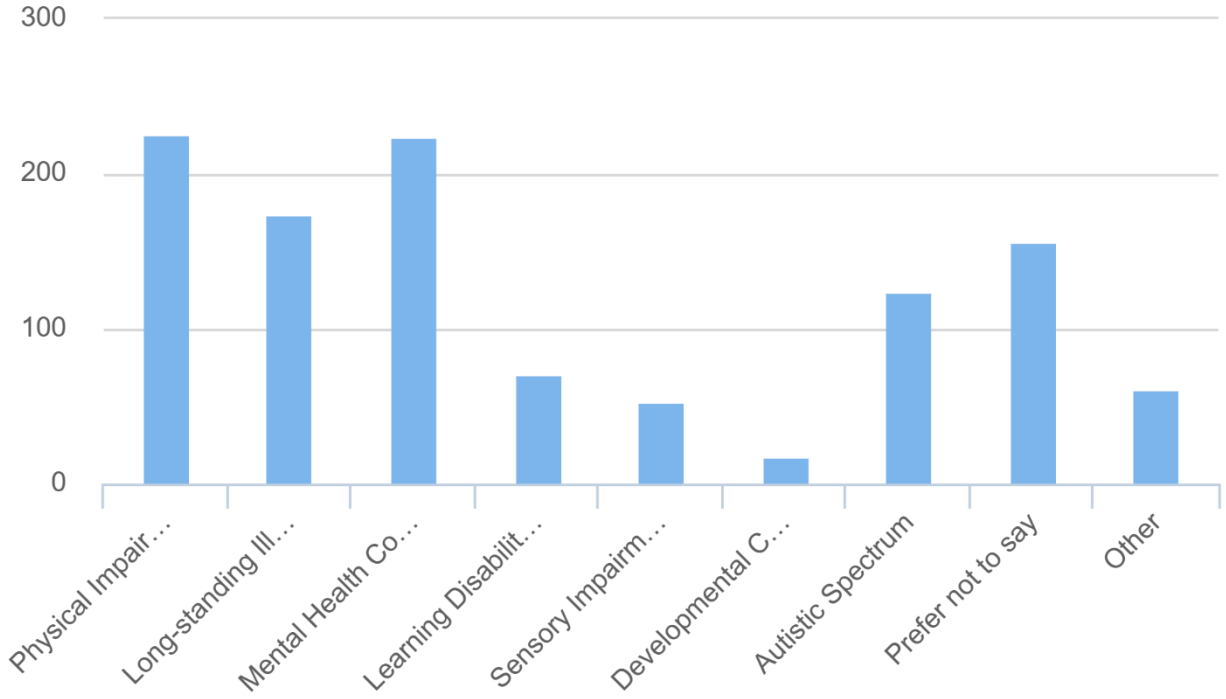
Here's what people told us about health problems or disabilities:

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?



The image above shows data from the libraries survey for the question on whether your day to day activities are limited due to a health problem or a disability. The majority of respondents said no, but there are still significant numbers of those who said 'yes, a little' (over 200) and 'yes, a lot' (over 150).

Do any of your conditions or illnesses reduce your ability to carry out day-to-day activities?



The image above shows data from the libraries survey asking people which conditions affect their ability to conduct day to day activities. A high response was made for mental health condition and physical impairment. Below that was long standing illness and having autism. A significant people also opted for 'prefer not to say'.

What we heard during the consultation:

Access and Mobility

- Disabled respondents to the survey highlighted the importance of having a library within walking distance. For those with physical impairments, mobility issues, or chronic health conditions, travelling further afield (especially to alternative libraries) could be felt to not be feasible. Steep hills, long distances, and the need to use multiple buses were cited as significant barriers.
- Some specifically mentioned that if their local library closed, they would lose access to library services altogether, as they could not manage the journey to another branch.

Libraries as Safe, Inclusive Spaces

- In some cases, Libraries were described as “lifelines” for disabled people, offering not just access to books but also a safe, warm, and welcoming environment. For some, the library is the only public space they feel comfortable and included.
- Several respondents with neurodivergent conditions (such as autism or ADHD) said that libraries provide a calm, quiet, and predictable environment that is important for their wellbeing.

Digital Exclusion

- A few respondents noted that not all disabled people can use digital services. Libraries provide essential access to computers, the internet, and staff support for those who do not have these facilities or skills at home. The closure of local libraries could worsen digital exclusion for disabled people.

Financial Barriers

- The cost of public transport was cited as a potential barrier for disabled people, especially those on low incomes or benefits. Some said that having to pay for buses or taxis to reach a more distant library would be prohibitive, effectively excluding them from library services.

Independence and Social Connection

- Libraries were seen as important for maintaining independence and social contact. For some disabled people, the library is the only place they can go independently, meet others, and feel part of the community. The loss of a local library was described by some as likely to increase isolation and dependence on others.

Accessible Facilities

- Several respondents mentioned the importance of accessible facilities in libraries, such as disabled toilets, step-free access, and staff support. Some noted that their local library is the only place nearby with an accessible toilet.

Impact on Carers and Families

- Carers of disabled people (including parents of disabled children and adults caring for elderly relatives) emphasised that local libraries are essential for their caring responsibilities. Libraries provide a safe, accessible space for outings, respite, and social interaction for both carers and those they care for.

Emotional and Mental Health

- Several disabled respondents described libraries as crucial for their mental health, providing a place to relax, escape isolation, and access information and support. The closure of libraries was seen as likely to have a negative impact on mental wellbeing.

Some quotes from survey respondents, specifically related to disability

"I am disabled and unable to access another library. You would be closing a vital service for me and others in the community. Closing the library will severely impact me as I am unable to visit any other library due to my disability and cannot afford to buy books, magazines or ebooks. You would be removing a vital service which would have a serious negative impact on my life."

"I have mobility issues, and the closure of the library would severely limit my access to a very valuable community resource."

"I have a PIP award for high mobility needs. I am disabled and there are very few places I can access in the city without transport. I can just about walk to the library and want to keep doing this. The library is part of the community. Don't take away parts of our community."

"There is no direct bus route or public transport between Westdene and Patcham library. There is a large hill and busy A23 which I cannot navigate due to disabilities."

Summary of potential impacts

- We heard from disabled people that local libraries are considered essential for their independence, social connection, mental health, and access to information. The closure or reduction of library services could disproportionately affect disabled people (and their carers) increasing isolation and digital exclusion. Accessible, local libraries are seen as an important part of an inclusive community and travel can be a barrier to accessing alternatives.

Mitigations against potential impacts

- Distance and travel to alternative libraries is a key consideration when considering closure. As with the age section above, the city is well served by public transport arrangements and most customers will be able to travel to alternative libraries. We recognise that this may be more difficult for disabled people who may be unable to walk far and rely on transport (public or private car) to travel to another library. The need to travel to an alternative site could impact those who are neurodivergent and may find it more difficult to adapt to a change in routine.
- For each of the proposed library closures there are alternative libraries within 2 miles and the city is generally well served by public transport.
- As part of business-as-usual work within the Library Service we'll continue to review accessibility of libraries, but especially those identified as alternatives for those impacted by closures. This will also be a kay way of informing the future strategy for the city.
- Expansion and targeted promotion of Home Delivery Service to those who are housebound who may lose access to local libraries.
- Further promotion of the library service's online offer of eBooks, eAudiobooks and online resources.
- Libraries near the ones proposed for closure will work on Welcome events, where informal inductions can be held, supporting users to become familiar with the space. Further promotion of the online 360 tours, to be used to help people familiarise themselves with other libraries before attending - Brighton & Hove libraries virtual tours

- Staff at libraries proposed for closure will support customers to sign up to and use the Libraries Extra offer, to access alternative local libraries and to understand the full offer made at Hove and Jubilee Libraries if more convenient.
- Targeted promotion of Large Print and eAudiobooks available for those with visual impairments.
- Targeted promotion of these facilities: How our libraries support people with sensory needs and disabilities

6.3 Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers):

Does your analysis indicate a disproportionate impact relating to ethnicity?	YES

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

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

What we know about library use/Black and Racially Minoritised people in the city and how any changes to library provision may impact on them:

According to the 2021 census 26% of people are Black or racially minoritised (27%):

- 4.8% Asian or Asian British (10%)
- 2.0% Black or Black British (4%)
- 4.8% Mixed or multiple ethnic group (3%)
- 1.1% Arab (0.6%) •

11.5% White Irish or White other (8%)

Despite the overall number of residents only increasing by 1% since the last Census, the number of Black and Racially Minoritised (BRM) residents has increased by over a third (35%, 18,921 people), especially in young population groups.

Certain Black and Racially Minoritised communities may be disproportionately affected, dependent on the demographic of the areas affected by library closures. This can be viewed in the image below which is the geographical spread to Census 2021 responders who identified as anything other than White. This shows that for the areas of proposed library closure there are fewer BRM residents.



The image above is a screen shot from the Local Insight website, detailing a map of the city and showing the numbers of people that told the 2021 census that they were from a non-white ethnic group. It shows that there is more of a diverse mix of residents in central areas as well as West Blatchington and Hangleton, plus Moulsecoomb, Coldean and Falmer. The image also details the location of the city libraries.

The recent public consultation heard the following:

- Jubilee and Hove libraries had the most ethnically diverse survey responder base, with higher proportions of respondents from Black, Asian, Mixed, and Other backgrounds compared to community branches.
- Community libraries (e.g., Rottingdean, Westdene, Hollingbury) were used predominantly by White British respondents, reflecting local population demographics.
- Libraries in more diverse parts of the city (e.g., Whitehawk, Moulsecoomb, Portslade) saw higher proportions of non-White respondents, though overall numbers were lower.
- Community libraries are less diverse in their reported user base, but there is a call for greater inclusion and representation in collections and programming.
- Race and ethnicity often intersect with other factors such as disability, digital exclusion, and low income. Responders from Black and Racially Minoritised backgrounds were more likely to mention barriers related to language, digital access, and feeling welcome in certain branches.
- The survey provides evidence that the central libraries (Jubilee, Hove) are particularly important for the more diverse communities in Brighton & Hove and any reduction in hours or accessibility at these branches is likely to have a disproportionate impact on Black, Asian, Mixed, and Other ethnic minority residents, as well as migrants and refugees.

Who we heard from during the consultation – related to race and ethnicity

The consultation was widely promoted through council platforms, social media accounts and local press. We sent targeted information about the proposals and the consultation to a wide range of community groups and networks, including groups supporting Black and Racially Minoritised

residents and visitors to the city. We also approached groups who support an intersectionality of identity of residents e.g. Black and Racially Minoritised LGBTQ residents.

In the public consultation survey, responders were invited to share their equalities monitoring data. 59% of respondents shared monitoring information. We had 2711 completed survey submissions.

Here's what people told us about their race and ethnicity:

How would you describe your ethnic origin?

Asian / Asian British: Bangladeshi	4
Asian / Asian British: Chinese	8
Asian / Asian British: Indian	33
Asian / Asian British: Other (please share details below)	12
Black / Black British: African	17
Black / Black British: Caribbean	14
Black / Black British: Other (please share details below)	2
Mixed: Any other mixed / multiple ethnic background	32
Mixed: Asian and White	17
Mixed: Black African and White	8
Mixed: Black Caribbean and White	9
Other ethnic group, please describe	29
Other Ethnic Group: Arab	12
Prefer not to say	42
White: English, Welsh, Scottish, Northern Irish, British	1099
White: Gypsy or Irish Traveller	2
White: Irish	32
White: Other	191
Asian / Asian British: Pakistani	2
(blank)	1146

Monitoring data received via the survey and the level of email responses were both evaluated throughout the period. As of 9th September, only 6% of respondents that shared monitoring information were from Black and Racially Minoritised backgrounds – this was not representative of the fact that 26% of the city's residents are from Black and Racially Minoritised backgrounds (Census 2021).

Additional online marketing that featured more diverse imagery (of real library customers) was created to support engagement with Black and Racially Minoritised residents on the proposals. At the consultation conclusion, 12% of respondents identified as being from a Black or Racially Minoritised background.

What we heard during the consultation relating to race and ethnicity

Libraries as Inclusive, Safe Spaces

- Some respondents from Black and Racially Minoritised backgrounds described libraries as safe, welcoming, and inclusive spaces. Several specifically mentioned that libraries are among the few public places where they feel comfortable, respected, and able to access resources without judgement or discrimination.
- Libraries were highlighted as important for people from all backgrounds, including migrants, refugees, and asylum seekers, who use them for English classes, support with paperwork, internet access, and as a neutral, inclusive environment.

Representation and Cultural Resources

- Some respondents noted the value of libraries in providing books and materials that reflect a diverse range of cultures, languages, and experiences. For example, parents mentioned the importance of their children seeing themselves represented in library books and resources.
- There were positive comments about libraries hosting events, book clubs, and displays that celebrate different cultures and histories, including LGBTQ+ and Black History Month activities.

Barriers and Concerns

- A few respondents from Black and Racially Minoritised backgrounds expressed concerns about feeling less comfortable in certain library environments, particularly if they are unstaffed or if there is a lack of visible diversity among staff and users.
- Some mentioned that language barriers or lack of culturally relevant materials can make libraries less accessible or welcoming for people from certain backgrounds.

Access to Education and Opportunity

- Libraries were described as crucial for supporting educational attainment and social mobility, especially for children from Black and Racially Minoritised backgrounds or low-income families who may not have access to books or study spaces at home.
- Several respondents highlighted that libraries help to close the gap in educational resources and opportunities for children from different ethnic backgrounds, providing free access to books, computers, and a quiet place to study.

Community and Social Connection

- Libraries were seen as important community hubs where people from different backgrounds can meet, interact, and build social connections. Respondents valued the opportunity to participate in multicultural events, language exchange groups, and community activities hosted by libraries.

Concerns About Cuts and Closures

- Some respondents expressed concern that closing libraries or reducing hours would disproportionately affect Black and Racially Minoritised communities, who may rely more heavily on public resources for education, social connection, and digital access.
- There was a sense that libraries play an important role in promoting equality, inclusion, and community cohesion, and that reductions in library services risk undermining these values.

Some quotes from survey respondents, specifically related to race and ethnicity

> “I am Black British and use the library as a safe space to study and meet others. There are not many other places in the city where I feel as comfortable and included.”

"As a Black / Black British: African woman, having the library as a safe, warm place to go is really important for me. Closing or reducing hours would make it much harder to find somewhere welcoming and accessible."

"The library is a safe space for me as a Black person, especially as I have a disability. I use the library to keep in touch with my community and to access resources I can't afford at home. Losing this would be a huge blow."

Summary of potential impacts

- Some people from a range of Black and Racially Minoritised backgrounds have said that libraries are essential for inclusion, representation, education, and community connection. Libraries are valued as safe, welcoming spaces that help bridge gaps in opportunity and provide resources that reflect and celebrate diversity. There is concern that reductions to library services would disproportionately impact minority ethnic communities and undermine efforts to promote equality and cohesion.

Mitigations against potential impacts

Black and Racially Minoritised communities who are resident in the city are most likely to be impacted by the proposed reduction in opening hours at Hove and/or Jubilee library due to density of resident populations.

- Clear and inclusive communications on any new opening hours of those central libraries, to ensure notice is given for users to amend when and how they use the service will be needed.
- Further promotion of the online library service offers to support people when the libraries are closed. This applies to all service users but may impact directly on local Black and Racially Minoritised residents due to the density of population in central areas of the city. If Black and Racially Minoritised service users are impacted by community library closures, travel and access to alternative libraries will be a consideration. Alternative libraries will be available within 2 miles of each library which are proposed for closure and the city is generally well served by public transport.
- Library users for whom English is not their first language require clear and accessible communications about any changes in library service offer and their regular library(ies).
- During the consultation families from a minoritised diaspora in the city told us that their language support groups would be directly affected by the proposals. Library staff will aim to work with them to find an alternative space or day and time to meet.
- Libraries across the city could do more to reflect the diversity of the city in their collections, events, and staffing. This will be reviewed in the development of the new Library Strategy in 2026 and in reviewing the Stock Policy.

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

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

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

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

What we know about library use/People of faith, belief, religion, spirituality or atheism in the city and how any changes to library provision may impact on them:

According to the 2021 census 55.2% of people have no religion or belief

- 30.9% Christian (46%)
- 3.1% Muslim (6.7%)
- 0.9% Jewish (0.5%)
- 0.9% Buddhist (0.5%)
- 0.8% Hindu (1.8%)
- 0.1% Sikh (0.9%)
- 1.0% Other religion (0.6%)

The recent public consultation heard the following:

- The majority of respondents identified as having no religion or belief or as Christian, but there was representation from Jewish, Muslim, Hindu, Buddhist, Sikh, and other faiths, as well as those who preferred not to say.
- Jubilee and Hove libraries had the most reported religiously diverse user base, with higher proportions of respondents from minority faiths compared to community libraries.
- Community libraries (e.g., Rottingdean, Westdene, Hollingbury) were used predominantly by respondents identifying as Christian or having no religion, reflecting local population demographics.
- Libraries in more diverse neighbourhoods (e.g., Whitehawk, Moulsecoomb, Portslade) also saw higher proportions of respondents from minority faiths, though overall numbers were proportionally lower than at Jubilee.
- Those who provided information about their religion and belief often had intersectional links with other factors such as ethnicity, disability, digital exclusion, and low income.
- Respondents from minority faith backgrounds were more likely to mention barriers related to language, digital access, and feeling welcome in certain libraries.

Who we heard from during the consultation – related to faith, religion and beliefs

- The consultation was widely promoted through council platforms/social media accounts and local press. We also sent targeted information about the proposals and the consultation to a wide range of community groups and networks. This included groups supporting residents of different faith groups.

- In the public consultation survey, responders were invited to share their equalities monitoring data. 59% of respondents shared monitoring information. We had 2711 completed survey submissions.

Here's what people told us about faith, religion and beliefs:

What is your religion or belief?

Religion or Belief	Count
Agnostic	47
Atheist	115
Buddhist	25
Christian	367
Hindu	15
I have no particular religion or belief	749
Jewish	24
Muslim	19
Other philosophical belief	53
Other religion or belief, please describe	29
Pagan	15
Prefer not to say	86
Sikh	2

What we heard during the public consultation relating to faith and belief

Libraries as Neutral, Welcoming Spaces

- Many respondents, including those from faith backgrounds described libraries as neutral, inclusive, and welcoming spaces. Libraries were valued as places where people of all faiths and beliefs can gather, learn, and feel safe without judgement or pressure to conform to any particular worldview.
- Some respondents specifically mentioned that libraries are among the few public spaces where they feel comfortable practising or expressing their faith, or simply being themselves, regardless of their religious background.

Faith-Based Community Use

- Several people noted that libraries are used by faith-based groups for meetings, book clubs, and community events. This may range from formal to informal.
- There were suggestions that libraries could partner with local churches, mosques, or other faith organisations to provide additional community services, especially if library hours are reduced.

Access for Religious Minorities

- Respondents from faith backgrounds expressed appreciation for libraries providing materials and resources that reflect a range of religious traditions and beliefs. Some

mentioned the importance of access to books, newspapers, and information relevant to their faith.

- A few respondents noted that libraries are important for religious minorities who may not have access to community spaces elsewhere, or who may feel marginalised in other public venues.

Libraries and Religious Practice

- Some respondents highlighted the practical role of libraries in supporting religious practice. For example, several mentioned using libraries on Sundays after attending church, or as a place to meet with others from their faith community.
- There were comments about the importance of weekend and evening opening hours to accommodate those who observe religious practices or attend services during the week.

Concerns About Cuts and Closures

- A number of respondents expressed concern that reducing library hours or closing branches would disproportionately affect people who rely on libraries for faith-related activities, community connection, or access to religious materials.
- Some noted that libraries are particularly important for those who may be isolated due to their faith, or who use libraries as a safe space to practise or explore their beliefs.

Some quotes from survey respondents, specifically related to faith and belief

"I am a Christian and the library is a place where I can educate myself and my children for free, reducing access hurts that ability."

"As a Muslim, I attend worship in Brighton on a Sunday morning and having somewhere to go afterwards to do some life admin or just read a magazine is really crucial. My Sunday morning is taken up with religious worship, I need Sunday afternoon facilities. It also has the biggest impact on working age people for whom Monday Friday 9-5 public services are inappropriate."

"The library is used by people of all ages, ethnicities, religion or belief. Closing it would impact the community, especially those who use it as a safe and inclusive space."

Summary of potential impacts

- People from a range of faith backgrounds reported that libraries are essential as neutral, inclusive spaces that support religious practice, community connection, and access to faith-related resources. There is concern that reductions in library services would disproportionately impact those who rely on libraries for faith-based activities, social connection, and safe, welcoming environments.

Mitigations

- The city retains a comprehensive library service which is available in a range of venues, dates and times – accommodating religious observances, festivals and prayer times.
- Provide accessible information about service changes in multiple formats and languages, ensuring faith communities are aware of new opening hours, closures, and alternative resources.
- Maintain and promote collections of faith-related materials (books, newspapers, resources) in remaining libraries and online, ensuring continued access for religious minorities.

- Any group losing their place to meet by a closure or reduction in opening hours will be supported to find alternative times/spaces within the library service, recognising the need to provide a safe inclusive space. Library staff to work with regular users of affected libraries to ensure regular but informal use is understood and supported to continue. Partner with local faith organisations (churches, mosques, temples, etc.) to explore the need for alternative meeting spaces when library access is reduced.
- Ensure libraries remain neutral, inclusive, and welcoming spaces, with staff trained to support people of all faiths and beliefs and provide prayer-friendly spaces where possible.

6.5 Sex:

Does your analysis indicate a disproportionate impact relating to Sex	YES

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

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

What we know about library use and sex and how any changes to library provision may impact on groups:

During the recent public consultation we heard the following:

- Female respondents were more likely to report frequent library use, especially for family and caring-related activities (e.g., visiting with children, attending storytime, using the library as a warm space for family).
- Male respondents also reported regular use, but were more likely to mention individual study, digital access, or leisure reading.
- Caring responsibilities: Many female respondents described themselves as primary carers for children or elderly relatives, and emphasised the importance of local, walkable libraries for family wellbeing and social connection.
- Safety and inclusion: Female respondents highlighted the library as a safe, welcoming space, particularly for those who may feel vulnerable or isolated elsewhere.
- Access to facilities: Female respondents were more likely to mention the importance of accessible toilets, baby changing, and breastfeeding-friendly spaces.
- Impact of closures/reduced hours: Female respondents, especially those with caring responsibilities, expressed concern that closures or reduced hours would disproportionately affect them and their families, making it harder to access books, social contact, and support.
- Female respondents who are also disabled, carers, or from minority backgrounds described the library as a lifeline for social contact, respite, and access to information.
- The survey provides evidence that women, especially those with caring responsibilities, are among the most frequent and dependent library users.

Who we heard from during the consultation – related to sex

- The consultation was widely promoted through council platforms/social media accounts and local press. We also sent targeted information about the proposals and the

consultation to a wide range of community groups and networks – including women-only groups and those impacted by domestic abuse.

- In the public consultation survey, responders were invited to share their equalities monitoring data. 59% of respondents shared monitoring information. We had 2711 completed survey submissions.

What People Told Us About Sex in the Survey Responses

Libraries as Safe, Inclusive Spaces

- Many respondents, including women, and those from LGBTQ+ communities, described libraries as some of the few public spaces where they feel safe, respected, and able to be themselves without judgement or harassment.
- Libraries were valued for their neutrality and inclusivity, with several respondents noting that they are welcoming to people of all genders and sexual orientations.

Women and Mothers

- Women, particularly mothers and carers, frequently mentioned that libraries are essential for their wellbeing and that of their children. Libraries were described as safe, warm, and free spaces to take children, breastfeed, meet other parents, and access resources.
- Some women highlighted the importance of libraries as places where they can go alone or with children and feel secure, especially during maternity leave.
- Several respondents mentioned that libraries are among the few places where women can breastfeed or change babies without pressure to spend money.

Boys

- We heard from a family concerned about the potential impact on their two boys if their local library closed. They raised the concern that some boys already struggle with finding enjoyment in reading and the closure of the local library could mean these boys end up less likely to enjoy reading as they reach teenage years and adulthood.

Barriers and Concerns

- A few respondents, particularly women, expressed concerns about feeling less comfortable in unstaffed libraries, especially in the evenings. Some mentioned that the presence of staff is important for their sense of safety and inclusion.
- There were also concerns about the impact of library closures or reduced hours on women, carers, and LGBTQ+ people, who may rely more heavily on libraries for social connection, information, and support.

Impact of Cuts and Closures

- Respondents expressed concern that closing libraries or reducing hours would disproportionately affect women (especially mothers and carers), LGBTQ+ people, and those who may not feel safe or welcome in other public spaces.
- Some noted that libraries are among the few places where people of all genders and sexual orientations can access resources, socialise, and feel part of the community without discrimination.

Some quotes from survey respondents, specifically related to sex

"I am a female mother trying to build a business so I need access the library as a working space and a safe place for my kids to work while I do this as we have no broadband.

Rather than trying to cut costs and save money, turn the library into a hub of activity where people want to come and work, read, study, meet."

"As a young mother who experienced a traumatic birth last year, I know this firsthand. Like many new parents navigating a health system under enormous pressure, I was left feeling overwhelmed, isolated, and frightened, especially with a sick newborn. The library became a lifeline. It was the one place I could go where I felt safe, welcome, and seen. There, I found solace in books about early years development and parenting. I discovered stories that helped me bond with my baby when everything else felt like it was falling apart. And, crucially, I found community—others to talk to, smile with, and share those fragile early days of parenthood."

"The closure of the library will mean two boys will likely end up less likely to read for enjoyment as they reach teenage years and adulthood. "

A summary of potential impacts

- Some respondents said that libraries are essential for people of all sexes and genders, providing safe, inclusive, and supportive spaces for women, mothers, LGBTQ+ people, and gender-diverse individuals. Service reductions or closures are likely to have a disproportionate impact on these groups, increasing isolation and reducing access to important resources and community support.

Mitigations

- Clear and inclusive communications on any new opening hours of central libraries, to ensure notice is given for users to amend when and how they use the service will be needed. This helps women—especially mothers and carers—plan their visits and adapt to new arrangements.
- Promote Alternative Breastfeeding-Friendly Spaces: Signpost and promote other breastfeeding-friendly venues in the city, ensuring women with young children continue to have access to safe, welcoming environments.
- Maintain and Publicise Safe, Inclusive Spaces: Keeping central libraries open as safe, inclusive spaces for women, mothers, and and ensure staff presence during key hours to support feelings of safety and inclusion.
- Expand Home Delivery and Online Services: Promote and, where possible, expand home delivery services and digital library resources (eBooks, audiobooks, online activities) to support women who may face barriers to accessing physical libraries.
- Engage with Women's Groups and Carers: Continue targeted engagement with women's organisations, carers' networks, and community groups to understand ongoing needs, gather feedback, and co-design further support or mitigation measures as service changes are implemented.

6.6 Gender Identity /Gender Reassignment:

Does your analysis indicate a disproportionate impact relating to Gender Identity/Gender Reassignment?	YES

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

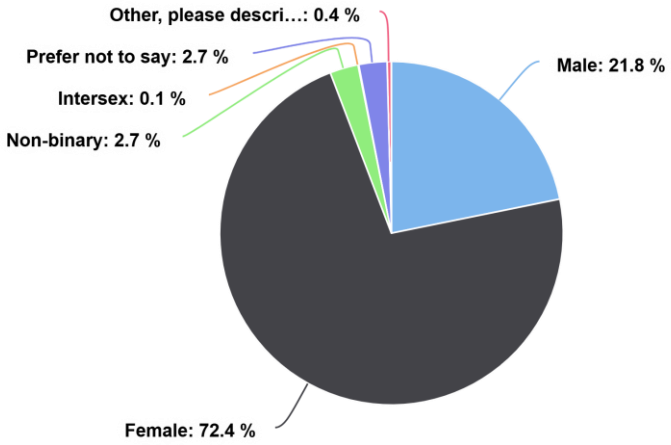
Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Who we heard from during the consultation – related to gender/gender identity

- The consultation was widely promoted through council platforms/social media accounts and local press. We also sent targeted information about the proposals and the consultation to a wide range of community groups and networks – including those supporting our trans, non-binary and intersex (TNBI) communities.

- In the public consultation survey, responders were invited to share their equalities monitoring data. 59% of respondents shared monitoring information. We had 2711 completed survey submissions.

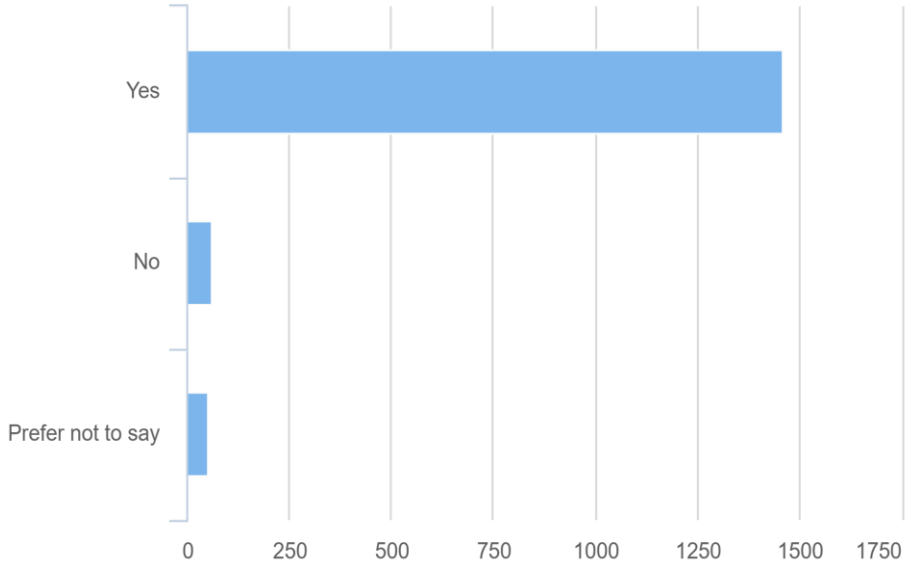
What best describes your sex?



The image above is pie chart detailing responses from the libraries survey in relation to the question about what best describes your sex. The vast majority of respondents (72.4%) said Female, followed by Male (21.8%). 2.7% of people said they were non-binary and 0.1% said they were intersex. The others either said other or prefer not to say.

Here's what people told us about gender and gender identity:

Is the gender you identify with the same as your sex registered at birth?



The image above is bar chart from the libraries consultation, detailing the answers to the question on whether your identity is the same as the one you were assigned at birth. The vast majority of respondents said Yes with smaller (under 100) saying No or Prefer not to say.

What we heard during the consultation relating to gender and gender identity

Diverse Gender Representation:

- The survey captured responses from a broad spectrum of gender identities, with the majority identifying as female, a significant proportion as male, and additional representation from non-binary, “prefer not to say”, and “other” gender identities

Patterns of Library Use by Gender:

- Female respondents were most likely to use libraries frequently, especially for family and caring-related activities. Male respondents tended to use libraries for individual study and digital access, while non-binary and gender-diverse respondents highlighted the importance of libraries as safe, inclusive, and gender-neutral spaces

Intersectional Impacts:

- The data shows that women—particularly those with caring responsibilities—are among the most dependent library users, and any reduction in local provision is likely to disproportionately affect them and their families. Non-binary and gender-diverse users may be especially impacted by changes that reduce staffed hours or access to gender-neutral facilities

Gender Diversity

- Respondents from LGBTQ+ backgrounds, including non-binary and transgender people, described libraries as safe havens where they can access information, meet others, and feel accepted. Some specifically mentioned that libraries provide resources and events relevant to LGBTQ+ identities and that staff are supportive and inclusive.
- There were positive comments about libraries hosting LGBTQ+ book clubs, displays, and events, and about the presence of gender-neutral toilets in some branches.

- Some non-binary and transgender respondents noted that they feel safer in libraries than in other public spaces, and that libraries are important for accessing information about gender identity and sexual orientation.
- Non-binary and “other” respondents described the library as a safe, inclusive space, and some highlighted the importance of gender-neutral facilities and staff sensitivity.
- Safety and inclusion: Some non-binary respondents highlighted the library as a safe, welcoming space, particularly for those who may feel vulnerable or isolated elsewhere.

Some quotes from survey respondents, specifically related to gender/gender identity

> “As a non-binary person I find the resources for LGBTQ+ people very useful, and in particular I appreciate the various art installations by local LGBTQ+ organisations which have been hosted at Jubilee Library.”
>
> “As a trans person, libraries are a safe place I can go to while in town to escape unwanted situations (which I have done many times)”
>
> “I am disabled and trans and the library is somewhere I go to feel safe and less lonely, I feel safe there are visits if something has triggered a panic attack. I usually visit in the late afternoon, after I've been to support groups or volunteering and I stay until closing. I am on low income and it is one of the few spaces in the city I can be without spending money. The proposed changes will effect me a lot, I am very sad to hear about them.”

A summary of potential impacts

Libraries are described as safe havens by LGBTQ+ individuals, offering access to information, community, and a sense of acceptance. Reducing library spaces and hours may make women, non-binary and transgender people feel less safe, especially at a time when trans safety nationally is perceived to be under threat.

- Libraries provide resources and events relevant to LGBTQ+ identities, as well as supportive, trained staff and gender-neutral toilets, which are valued by these communities.
- Some respondents noted that libraries are among the few public spaces where they feel safe from discrimination and able to be themselves.
- Changes to library services risk increasing isolation and reducing access to important and valued safe spaces for LGBTQ+ people.

Mitigations for Potential Impacts

- Maintain and Promote Safe, Inclusive Spaces: Ensure all remaining libraries continue to be explicitly welcoming to LGBTQ+ users, with visible signage, inclusive policies, and ongoing staff training to reinforce a zero-tolerance approach to discrimination and celebrate diversity.
- Retain and Publicise Gender-Neutral Facilities: Keep gender-neutral toilets and changing facilities available in as some Ibraries and clearly signpost these amenities so that customers feel comfortable and safe.
- Continue and Expand LGBTQ+ Resources and Events: Offer and promote resources, book clubs, displays, and events relevant to LGBTQ+ identities, ensuring that gender diverse users see themselves represented and supported in library programming.

- Consult and Engage with LGBTQ+ Communities: Regularly seek feedback from LGBTQ+ users (and relevant community groups) to identify emerging needs and co-design further improvements or mitigations.
- Provide Clear, Accessible Communication About Service Changes: Ensure that any changes to opening hours, facilities, or services are communicated in accessible formats and through channels that reach LGBTQ+ communities, so users can plan their visits and access alternative support if needed.

6.7 Sexual Orientation:

Does your analysis indicate a disproportionate impact relating to Sexual Orientation?	YES

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

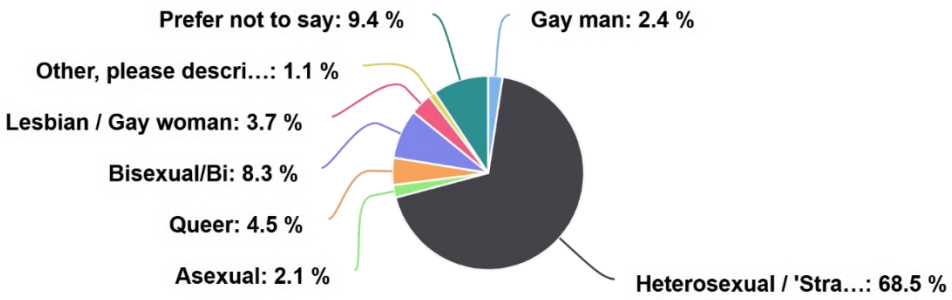
Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Who we heard from during the consultation – related to sexual orientation

The consultation was widely promoted through council platforms and social media accounts and local press. We also sent targeted information about the proposals and the consultation to a wide range of community groups and networks; this included groups supporting LGBQ+ residents

In the public consultation survey, responders were invited to share their equalities monitoring data. 59% of respondents shared monitoring information. We had 2711 completed survey submissions.

Which of the following best describes your sexual orientation?



The image above is a pie chart detailing the responses in the libraries consultation on what best describes the respondents sexual orientation. The majority (68.5%) said heterosexual/straight. Others included 2.4% saying Gay Man and 3.7% saying Lesbian/Gay Woman. Nearly 10% of respondents said they'd Prefer not to say.

What People Told Us About Sexual orientation in the Survey Responses

- The majority of respondents identified as heterosexual/straight, but there was significant representation from lesbian/gay women, gay men, bisexual, asexual, queer, and "other" respondents, as well as those who preferred not to say.

- LGBTQ+ respondents (including lesbian, gay, bisexual, asexual, queer, and non-binary users) described the library as a safe, inclusive, and affirming space, particularly for those who may feel marginalised or isolated elsewhere.
- Heterosexual respondents also reported regular use, but were less likely to mention safety or inclusion as a primary concern.
- Some LGBTQ+ respondents who are also disabled, non-binary, or from minority backgrounds described the library as a lifeline for social contact, support, and access to information.

Libraries as Safe, Inclusive Spaces

- Some respondents from LGBTQ+ communities described libraries as some of the few public spaces where they feel safe, respected, and able to be themselves without judgement or harassment.
- Libraries were valued for their neutrality and inclusivity, with some respondents noting that they are welcoming to people of all sexual orientations.

LGBTQ+ and Gender Diversity

- There were positive comments about libraries hosting LGBTQ+ book clubs, displays, and events, and about the presence of gender-neutral toilets in some branches. Some specifically mentioned that libraries provide resources and events relevant to LGBTQ+ identities and that staff are supportive and inclusive.

Barriers and Concerns

- A few respondents, particularly women and non-binary people, expressed concerns about feeling less comfortable in unstaffed libraries, especially in the evenings. Some mentioned that the presence of staff is important for their sense of safety and inclusion.
- There were also concerns about the impact of library closures or reduced hours on women, carers, and LGBTQ+ people, who may rely more heavily on libraries for social connection, information, and support.

Impact of Reductions and Closures

- Respondents expressed concern that closing libraries or reducing hours would disproportionately affect women (especially mothers and carers), LGBTQ+ people, and those who may not feel safe or welcome in other public spaces.
- Some noted that libraries are among the few places where people of all genders and sexual orientations can access resources, socialise, and feel part of the community without discrimination.

Resources

- LGBTQ+ respondents highlighted the importance of diverse collections, inclusive events, and visible representation in library spaces, noting that access to resources and community support is a key reason for their frequent library use.

Some quotes from survey respondents, specifically related to sexual orientation

> “As a queer person, it also gives me a safe space to be when I am out… and not ready to go home yet as it is a difficult place to be.”

> “As a lesbian/gay woman, I find the library a welcoming and inclusive space. Reducing hours or closing libraries would mean losing one of the few places in the city where I feel comfortable and safe.”

"I am bisexual and feel that libraries are places in which I am safe from discrimination."

Summary of potential impacts:

- People told us that libraries are essential for people of all sexes and genders, providing safe, inclusive, and supportive spaces for women, mothers, LGBTQ+ people, and gender-diverse individuals. Reductions or closures are likely to have a disproportionate impact on these groups, increasing isolation and reducing access to important resources and community support.

Mitigations against potential impacts

- Maintain and Promote Safe, Inclusive Spaces: Ensure all remaining libraries continue to be explicitly welcoming to LGBQ+ and gender diverse users, with visible signage, inclusive policies, and ongoing staff training to reinforce a zero-tolerance approach to discrimination and harassment.

- Retain and Publicise Gender-Neutral Facilities: Keep gender-neutral toilets and changing facilities available in some libraries and clearly signpost these amenities so that all users feel comfortable and safe.

- Continue and Expand LGBTQ+ Resources and Events: Offer and promote resources, book clubs, displays, and events relevant to LGBQ+ and gender diverse identities, ensuring that users see themselves represented and supported in library programming.

- Consult and Engage with LGBTQ+ Communities:
  Seek feedback from gender queer, non-binary, trans, and LGBQ+ users (and relevant community groups) to identify emerging needs and co-design further improvements or mitigations.

- Provide Clear, Accessible Communication About Service Changes: Ensure that any changes to opening hours, facilities, or services are communicated in accessible formats and through channels that reach LGBTQ+ communities, so users can plan their visits and access alternative support if needed.

6.8 Marriage and Civil Partnership:

Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?	NO

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

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

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

Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)?	NO

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

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

6.10 Armed Forces Personnel, their families, and Veterans:

Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?	NO

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

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

6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

Does your analysis indicate a disproportionate impact relating to Expatriates, Migrants, Asylum seekers, Refugees, those New to the UK, and UK visa or assigned legal status? (Especially considering for age, ethnicity, language, and various intersections)	YES

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

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

The recent public consultation heard further detail below.

- There was clear representation from migrants, refugees, and asylum seekers, including those who identified as having English as an additional language or who described themselves as new to the UK.
- Jubilee and Hove libraries are reported to be important for migrants and asylum seekers, as these branches may be more likely to offer:
    - Books and resources in multiple languages
    - English language learning materials
    - Staff support for digital access, paperwork, and integration
    - Community events and social opportunities
    - Council Help Desks
- Community libraries are used by some migrants, especially those living in more diverse neighbourhoods (e.g., Whitehawk, Moulsecoomb, Portslade).
- Migrant and asylum seeker status often intersects with other factors such as ethnicity, language, digital exclusion, low income, and disability.

- Additional data, gained from the 2021 census, shows a higher density of households where no people have English as a main language in the proximity of Jubilee and Hove libraries.

What we heard in the consultation relating to migrants, asylum seekers and refugees

Libraries as Safe, Inclusive Spaces

- Libraries were frequently described as some of the few public spaces where migrants, asylum seekers, and refugees feel safe, welcome, and included. Respondents noted that libraries are neutral environments where people from all backgrounds can access resources and support without fear of discrimination or judgement.

Access to Information, Language Support, and Digital Inclusion

- Several respondents highlighted the importance of libraries for migrants and refugees who may not have access to the internet, computers, or printers at home. Libraries provide essential digital access for job searches, benefit applications, and communication with family or support services.
- Libraries were also valued for providing English language learning resources, books in different languages, and support with paperwork or official forms. Some mentioned that libraries host English classes, conversation groups, or provide information about local services.

Community and Social Connection

- Libraries were seen as important community hubs where migrants, asylum seekers, and refugees can meet others, build social networks, and reduce isolation. Some respondents mentioned that libraries help newcomers to the UK feel part of the local community and offer opportunities to participate in multicultural events or activities.

Support for Children and Families

- Respondents noted that libraries are especially important for migrant and refugee families with children, providing free access to books, homework support, and a safe place to learn and play. Libraries help children from migrant backgrounds develop literacy skills and confidence and offer parents a supportive environment to connect with others.

Barriers and Concerns

- Some respondents expressed concern that language barriers, lack of culturally relevant materials, or unfamiliarity with library systems can make it harder for migrants and refugees to access services. There were also worries that cuts to library hours or closures would disproportionately affect these groups, who may rely more heavily on libraries for support and inclusion.

Some quotes from survey respondents, specifically related to migrants and asylum seekers

> “I am a neurodiverse migrant woman from the LGBT community. The libraries in Brighton and Hove have been some of the most welcoming, safe spaces I have been able to access.”
> “I am not a migrant but I work closely with the refugee and migrant community and libraries are a crucial resource for many of these people. The home office does not provide WiFi which is an essential utility in 2025 and many people can only access it at the library.”

"Libraries are a crucial third space – used by myself, my partner and almost every single person I know. I cannot afford to buy the books I read, and in a world of increasing cost and reducing opportunity, the library is a literal beacon of opportunity. I would do anything I could to help the library survive, thrive, and stand against reduction of any kind."
(This quote is from a user who identifies as a migrant and highlights the importance of libraries for access and inclusion.)

Summary of potential impacts:
People told us that libraries are essential for migrants, asylum seekers, and refugees, providing safe, inclusive spaces, digital and language support, and opportunities for social connection and learning. Reductions or closures are likely to have a disproportionate impact on these groups, increasing isolation and reducing access to important resources.

Mitigations against potential impacts:

- Maintain Safe, Inclusive Spaces: Ensure that all remaining libraries continue to be welcoming, neutral environments where people from all backgrounds can access resources and support without fear of discrimination or judgement.

- Promote and Expand Access to Digital and Language Resources: Continue to provide and publicise access to computers, internet, printers, and English language learning resources, including books in different languages.

- Targeted Communication and Outreach: Communicate any changes to library services in multiple languages and accessible formats, and work with local organisations to ensure migrants, asylum seekers, and refugees are aware of alternative resources and support available.

- Support Community and Social Connection: Facilitate opportunities for migrants, asylum seekers, and refugees to meet others, build social networks, and participate in multicultural events or activities within libraries or through partnerships with community groups.

- Provide Support for Children and Families: Ensure that migrant and refugee families continue to have access to free books, homework support, and safe spaces for children to learn and play, and offer parents a supportive environment to connect with others.

6.12 Carers:

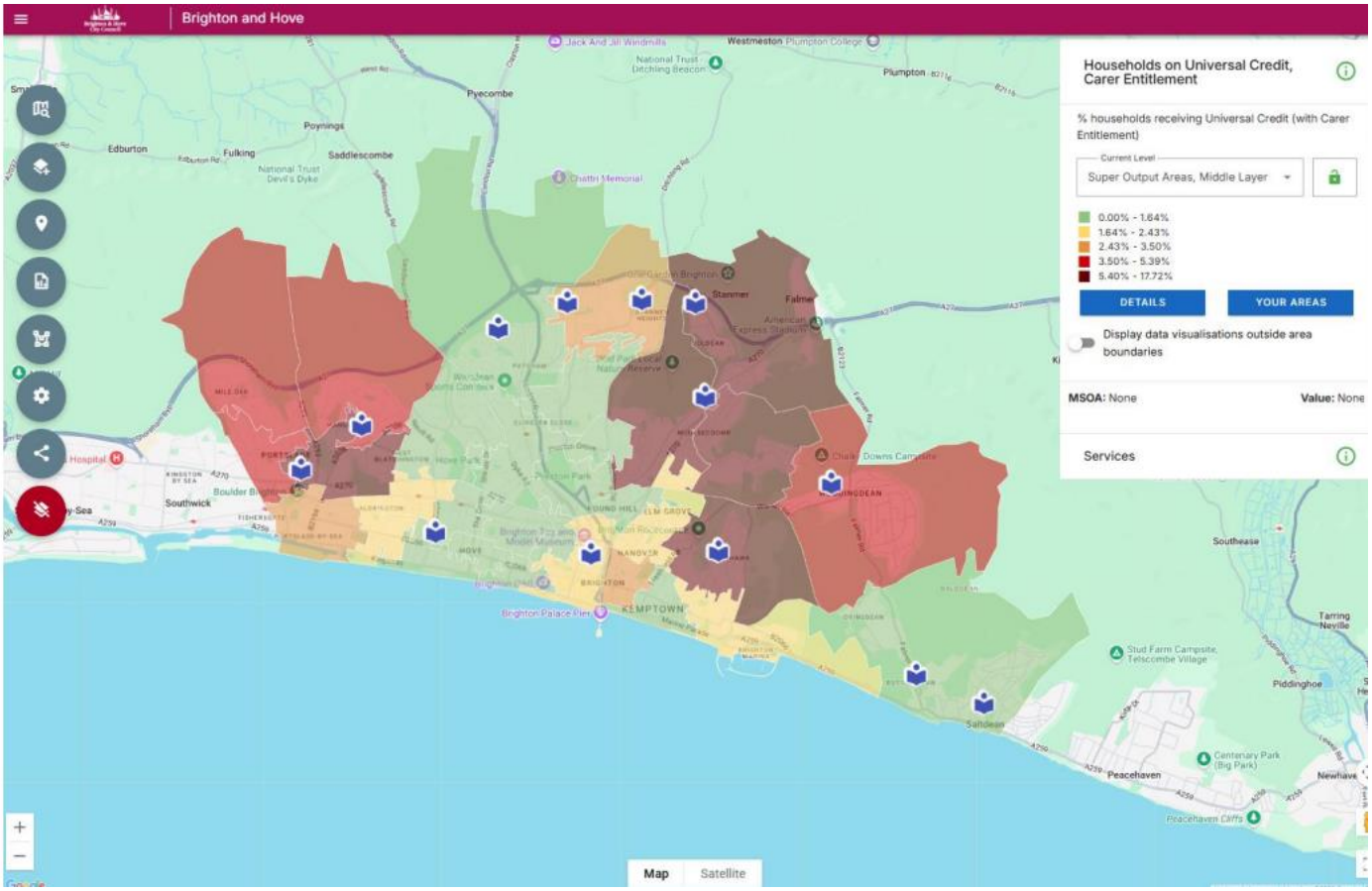
Does your analysis indicate a disproportionate impact relating to Carers (Especially considering for age, ethnicity, language, and various intersections).	YES

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

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

According to the 2021 census, 1 in 12 residents (20,800 people, 7.8%) provide un-paid care (9%).

The image below shows a geographical spread of households who receive Universal Credit with carer entitlement. This shows us that there is a lower density of those residents in the area around Westdene Library but an increased % of the population around Hollingbury Library. It also shows us that there is an increased % of the population around Jubilee Library and near to Hove Library, where there are proposed reductions in opening hours.



The image above is a screen shot from the Local Insight website, detailing a map of the city and showing the percentages of households receiving universal credit with carer entitlement. The image shows that rates are higher in some of the 'periphery' areas of the city such as Mile Oak, Falmer and Woodingdean. The image also details the location of the city libraries.

The recent public consultation heard the following:

- Those who identified as carers are frequent library users.
- Some carers described the library as one of their only opportunities for social contact and a break from caring responsibilities.
- Many carers are also women, disabled, or from Black or Racially Minoritised backgrounds.

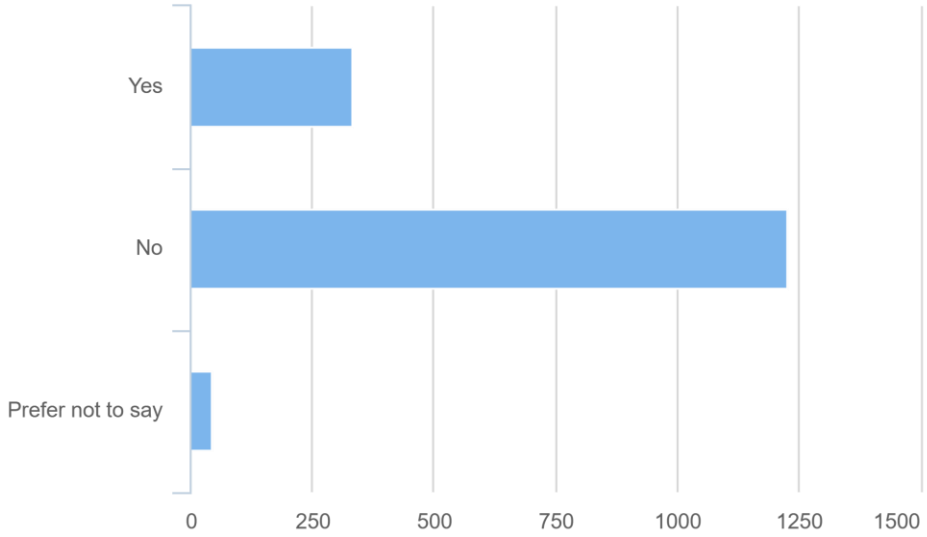
Who we heard from during the consultation – related to being a carer

- The consultation was widely promoted through council platforms and social media accounts and local press. We also sent targeted information about the proposals and the consultation to a wide range of community groups and networks, this included groups supporting carers.

- In the public consultation survey, responders were invited to share their equalities monitoring data. 59% of respondents shared monitoring information. We had 2711 completed survey submissions.

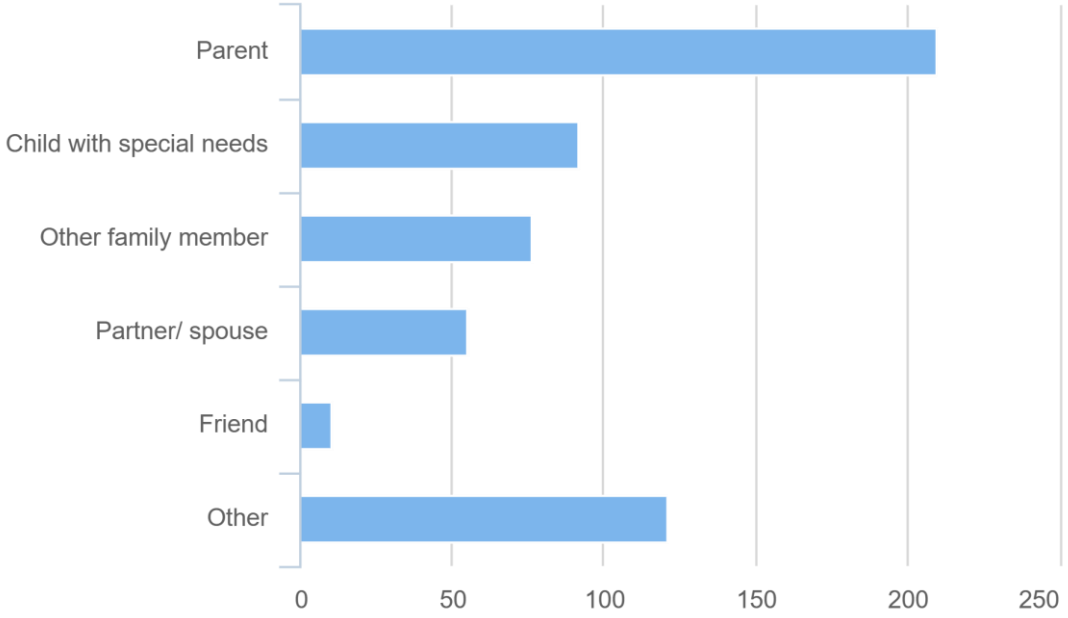
Here's what people told us about being a carer:

Are you a carer?



The image above is a sbar chart from the libraries survey, showing the that majority of respondents said that they were not a carer, but a significant number of people (around 300) replied that they were.

If you answered 'yes' above, please state who you care for. If you care for more than one person please tick all that apply. If none apply, please mark 'other'



The image above is a bar chart from the libraries survey, detailing who people care for (if they indicated that they are a carer). The highest response was 'parent', followed by other, child with special needs, other family member, partner/spouse and then friend.

What we heard in the consultation about carers

Libraries as Essential Support for Carers

- Many carers (including parents, those caring for elderly relatives, and those supporting people with disabilities or special needs) described libraries as a lifeline. Libraries provide a safe, accessible, and free space for both carers and those they care for to visit, relax, and engage in activities outside the home.
- Carers highlighted that libraries offer respite, opportunities for social interaction, and a break from isolation. For some, the library is the only place they can go with the person they care for, especially if mobility or behavioural needs make other venues difficult.

Accessibility and Proximity

- Carers repeatedly stressed the importance of having a library within walking distance. Travelling further afield, especially with someone who has mobility issues, learning disabilities, or young children, is often impractical or impossible. The closure of local libraries was seen as likely to reduce outings and increase isolation for both carers and those they support.

Libraries as Community Hubs

- Libraries were described as community hubs where carers can meet others in similar situations, access information, and participate in activities or support groups. Some mentioned attending story time, book groups, or simply using the library as a warm, welcoming space to connect with others.

Digital and Practical Support

- Several carers noted that libraries provide essential access to computers, printers, and the internet, which are needed for managing care responsibilities, accessing benefits, or supporting the cared-for person's education and wellbeing. Staff support was also valued for help with paperwork or finding information.

Impact of Cuts and Closures

- Respondents expressed concern that closing libraries or reducing hours would disproportionately affect carers, who may have limited time, energy, or resources to travel further or pay for alternative activities. Some worried that the loss of local libraries would increase stress, reduce opportunities for respite, and negatively impact the wellbeing of both carers and those they care for.

Intergenerational and Family Value

- Carers of children, grandchildren, and elderly relatives described libraries as places where different generations can come together, share experiences, and access resources tailored to their needs. Libraries were seen as supporting family cohesion and providing opportunities for learning and enjoyment for all ages.

Some quotes from survey respondents, specifically related to being a carer or having caring responsibilities

> "My husband doesn't drive and is the primary carer for our children. He also has mobility issues which means taking the children out using the buggy and walking is vital. Public

transport is not possible for him with a baby and toddler. Closing the library will restrict him even further & make his and my children's lives smaller."

"As someone with caring responsibilities I have an extremely limited options for leaving my home but the local library is a little haven for me to access. The wonderful librarian is a precious source of contact and understanding and I'd feel lost without her."

"I look after my parent with Alzheimer's and cannot leave her on her own without getting someone to sit with her …the local library here is close enough for me to manage everything."

Summary of potential impact on carers

- Carers told us that libraries are essential for their wellbeing and that of those they care for. Local, accessible libraries provide respite, social connection, practical support, and opportunities for learning and enjoyment. Reduction in services could impact on carers, increasing isolation and reducing access to valued resources.

Mitigations against potential impacts

- Library users who have caring responsibilities or who require care will require accessible, affordable and timely access to alternative libraries. For each of the proposed library closures there are alternative libraries within 2 miles and the city is generally well served by public transport.
- Library users who are full-time carers are entitled to concessionary library membership, with longer loan periods and lower fees and charges. This service could be actively promoted to offset potential impact of closures and reductions in opening hours.
- The library service does offer a Home Delivery Service, available for those who might struggle to visit a library in person, including carers. This may be an alternative for some who could be impacted by a community library closure.

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

Does your analysis indicate a disproportionate impact relating to Looked after children, Care Leavers, Care and fostering experienced children and adults (Especially considering for age, ethnicity, language, and various intersections). **Also consider our Corporate Parenting Responsibility in connection to your activity.**	YES

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

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

Brighton & Hove City Council have adopted Children in Care and Care Experienced as a protected characteristic and will demonstrate commitment to this group aligned to our responsibilities under the Public Sector Equality Duty.

For Brighton & Hove there were 345 Children in Care at 31st July 25. The rate per 10,000 is 73.9, above the 23/24 national average of 70, the South East average of 56, and the statistical neighbour average of 62.1.

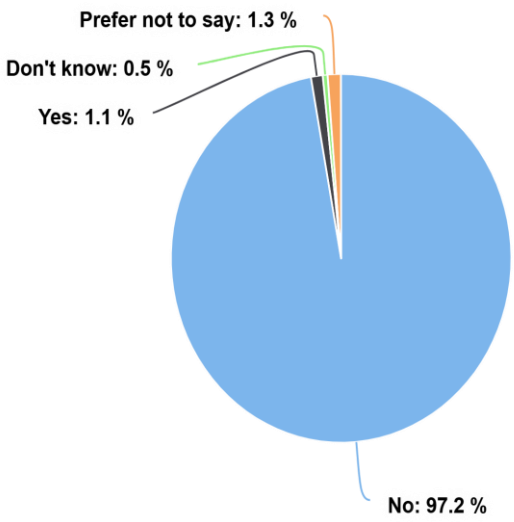
Who we heard from during the consultation – related to being care experienced

- The consultation was widely promoted through council platforms and social media accounts and local press. We also sent targeted information about the proposals and the consultation to a wide range of community groups and networks. This included groups supporting young people in care, care leavers and those who are care experienced.

- In the public consultation survey, responders were invited to share their equalities monitoring data. 59% of respondents shared monitoring information. We had 2711 completed survey submissions.

Here's what people told us about being care experienced:

Are you, or have you been, looked after by a local authority for at least 13 weeks since the age of 14?



The image above is a pie chart from the libraries survey showing that the vast majority of residents reported that they had never been looked after (in care) by a local authority. Only 1.1% of respondents said that they were.

What we heard during the consultation about Being Care Experienced

Direct Mentions and Representation

- A small number of respondents directly identified as care experienced or answered questions about being looked after by a local authority. Some mentioned this in the context of equalities monitoring or demographic questions, but there were very few extended comments specifically about the experience of being in care.

Libraries as Safe and Supportive Spaces

- Where care experience was mentioned, libraries were valued as safe, neutral, and supportive spaces for young people who may not have stable homes or family support. Libraries were described as places where care experienced young people can access books, computers, and a quiet place to study or relax without stigma or cost.

- Some respondents noted that libraries are important for care experienced children and young people to access resources for homework, reading for pleasure, and social connection, especially if they move placements or lack books at home.

Barriers and Concerns

- There were concerns that care experienced young people may face additional barriers to accessing libraries, such as frequent moves, lack of transport, or not knowing how to use library services. Some respondents suggested that libraries could do more outreach to children in care, foster carers, and care leavers to ensure they know about and can access library services.

- A few respondents highlighted that libraries can be really important for care experienced young people who may otherwise be isolated, and that closures or reduced hours could disproportionately affect this group.

Equal Opportunities and Inclusion

- Some responses referenced the importance of libraries in providing equal access to books, learning, and safe spaces for all children, including those who are care experienced. Libraries were seen as helping to level the playing field for children who may not have the same opportunities or support as their peers.

Some quotes from survey respondents, specifically related to being care experienced

> "It is used by children's social services for contact sessions, for child protection cases, both supervised and unsupervised. It is perfect as it is never empty and has access to a garden too. I can't think of anywhere else local that offers that. It is also used by young mothers in temporary accommodation as a place to go. Which is brilliant for their children."

> "As a foster parent, my foster son has disabilities. I value library space as a welcoming, calm public space where I don't have to spend any money, my son can witness all kinds of interesting social interaction and see how our collective knowledge and stories are stored in communal spaces free of charge and without barriers."

A summary of potential impacts

- People told us that libraries are especially important for care experienced children and young people, providing safe spaces, equal access to resources, and opportunities for learning and social connection. There is concern that barriers to access and the impact of cuts could disproportionately affect this group, and that libraries should do more to reach out and support care experienced individuals.

Mitigations

Targeted Communication and Outreach

- Ensure care experienced children, young people, and their carers are proactively informed about any changes to library services, including closures or reduced hours.
- Use multiple channels (schools, social workers, foster care networks, community groups) to reach care experienced individuals who may not be connected to standard council or city-wide communications such as the social media accounts.

Alternative Access Arrangements

- Signpost and facilitate access to alternative libraries within a reasonable distance, ensuring that care experienced young people know where and how to access these services.
- Provide information about public transport options, travel support, or digital resources to help overcome barriers such as lack of transport or frequent moves.

Digital Inclusion Support

- Ensure care experienced young people have access to digital resources (eBooks, audiobooks, online learning tools) and the library service should link with care support services to ensure digital library resources are well promoted to care experienced children and young people.
- Continue to offer digital literacy support and guidance on how to use online library services.

Safe Spaces and Social Connection

- Work with schools, youth services, and community organisations to identify and promote alternative safe spaces for study, social connection, and support if local libraries are unavailable.

Staff Training and Awareness

- Ensure library staff are trained to understand the needs of care experienced children and young people, including the barriers they may face and how to offer sensitive, non-stigmatising support.

Ongoing Engagement and Feedback

- Continue to engage with care experienced individuals and their advocates as part of library service Business As Usual work to monitor the impact of changes and adapt support as needed.
- Use feedback from care experienced users to inform future service planning and enable their voices to be heard in decision-making.

6.14 Homelessness:

Does your analysis indicate a disproportionate impact relating to people experiencing homelessness, and associated risk and vulnerability? (Especially considering for age, veteran, ethnicity, language, and various intersections)	YES

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

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

What we know about library use/people who are homeless or at risk of homelessness and how any changes to library provision may impact on them:

There are a number of vulnerably or un-housed customers who regularly use Jubilee Library as a safe, warm space, particularly in winter. Any reduction in opening hours could disproportionately affect this group.

What we heard in the consultation about Homeless and Rough Sleepers

A number of respondents identified as currently or previously homeless, rough sleeping, or living in temporary accommodation, and several others described working with or supporting people experiencing homelessness.

Libraries as Safe, Warm, and Inclusive Spaces

- Respondents highlighted that libraries are one of the very few places in the city where homeless people and rough sleepers can go to be safe, warm, and sheltered without any expectation to spend money. Libraries were described as important for those who are homeless, providing a refuge from the streets, especially during cold or bad weather.
- Some respondents mentioned that libraries are used by people who are homeless to access basic facilities such as toilets, warmth, and a place to rest or read during the day.

Access to Information and Digital Inclusion

- Libraries were valued for providing free access to computers, the internet, and information. For people who are homeless or rough sleeping, this access is crucial for job searches, benefit applications, communication with support services, and staying connected with friends and family.
- Several respondents noted that digital exclusion is a significant issue for homeless people, and libraries help bridge this gap.

Social Connection and Reducing Isolation

- Libraries were described as important for reducing social isolation among homeless people and rough sleepers. They offer a non-judgemental environment where people can feel part of the community, interact with others, and access support or advice.

Practical Support and Staff Kindness

- Respondents appreciated the kindness and support of library staff, who often help homeless people with information, printing, or accessing services. Some mentioned that staff are understanding and treat everyone with respect, regardless of their housing status.

Some quotes from survey respondents, specifically related to homelessness, vulnerably housed and rough sleepers

> “As a member of the homeless community, I find the Jubilee Library an essential community resource. i.e. as a safe warm space, a source of essential information and Yes also the staff are very decent and welcoming.”
>
> “Libraries are a vital community service. Not only do they offer free resources for learning and self development but also offer warm spaces and a sense of community to some of the most vulnerable members of our society. To limit access to such vital services by reducing opening hours could have serious impact on frequent vulnerable users’ health and wellbeing.”

A summary of the potential impacts:

- People told us that libraries are essential for homeless people and rough sleepers, providing safe, warm, and inclusive spaces, digital access, social connection, and practical support. Reductions or closures are likely to have a significant negative impact on these groups, increasing isolation and hardship.

Mitigations

- Promote alternative warm spaces for periods of library closure. Ensure this information is visible within libraries.

- Continue to provide access to computers, internet, and printing for job searches, benefit applications, and communication/ signposting with support services.

- Ensure library staff are trained to support people experiencing homelessness with sensitivity and can signpost to relevant local services (housing, health, benefits, food banks). Consider outreach partnerships with local homelessness charities for in-library advice sessions.

- Maintain access to essential facilities such as toilets and drinking water points (where possible) during staffed hours.

- As part of business as usual, consider the establishment of a mechanism for ongoing feedback from people experiencing homelessness and frontline organisations, to monitor the impact of any changes and to adapt any mitigations as required.

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

Does your analysis indicate a disproportionate impact relating to Domestic Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)?	YES

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

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

During the survey, we heard from a few respondents about their experience of domestic abuse and how libraries have provided a safe alternative space in their lives. These examples of lived experience help inform our wider understand of the impact of reducing the library service in the city.

6.16 Socio-economic Disadvantage:

Does your analysis indicate a disproportionate impact relating to Socio-economic Disadvantage? (Especially considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections)	YES

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

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

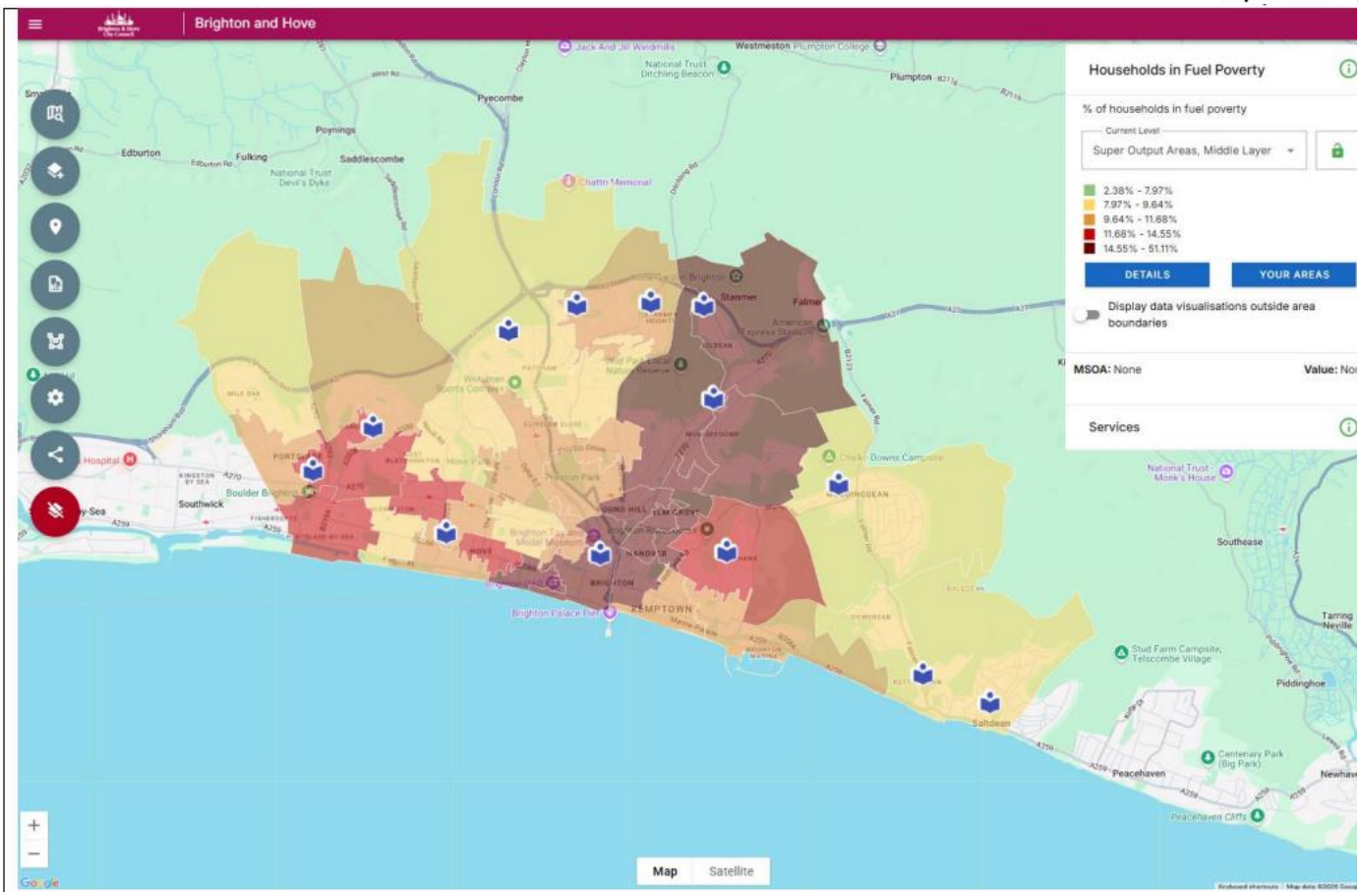
What we know about library use/people who are at socio-economic disadvantage or at risk of homelessness and how any changes to library provision may impact on them:

Customers at a socio-economic disadvantage may be less able to pay for travel to alternative provision.

Regarding Hollingbury Library, while at ward level the area's IMD ranking suggests residents live at relatively low risk of deprivation, at a more granular level there are pockets of high deprivation that should be acknowledged close to the centre in which the library is situated. Overall, ward residents are at a lower risk of digital exclusion than the city's average and 84% of residents own a car.

Regarding Westdene Library, residents of Westdene & Hove Park ward are the most likely in the city to own a car and have qualifications. They are the least likely in the city to be digitally excluded, economically inactive or in receipt of benefits. It is the lowest scoring (least deprived) ward in Brighton & Hove with an IMD ranking of 28,634 and has the lowest number of economically inactive residents. The ward has the lowest crime rate in the city and children here are the least likely (by a significant majority) to be in receipt of free school meals.

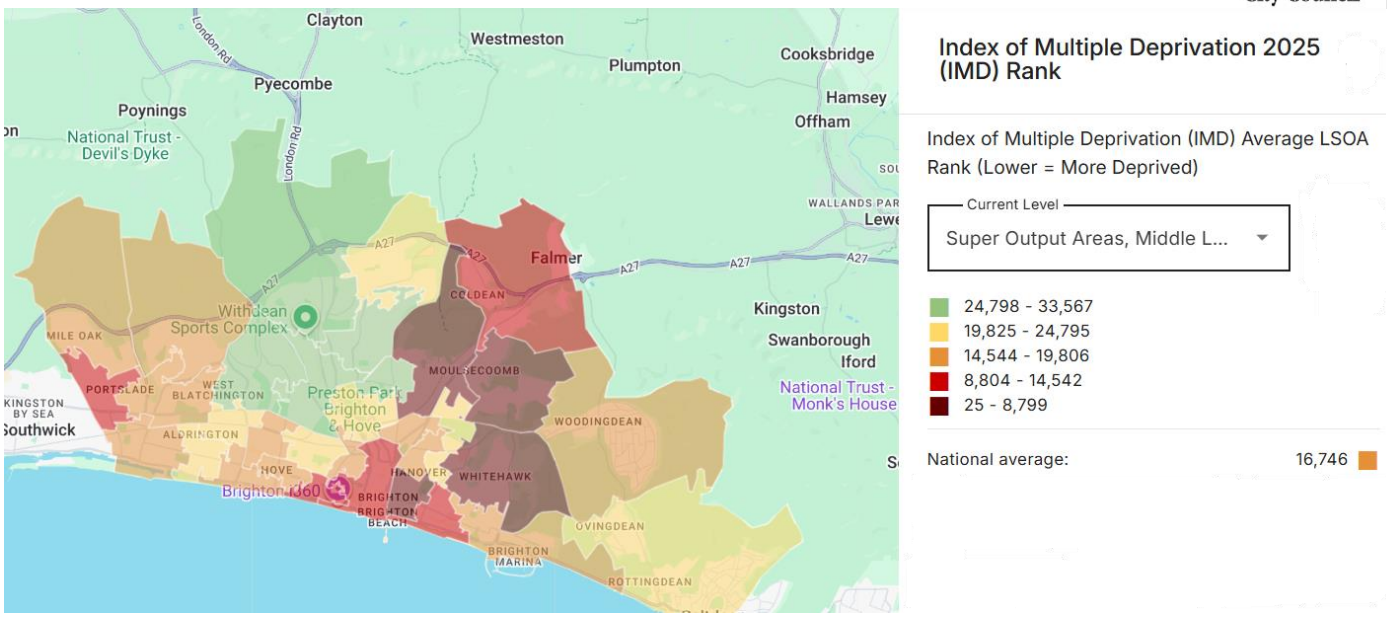
The image below shows the geographical spread of households in Fuel Poverty. This shows us that there are lower % of houses in fuel poverty around Westdene Library but a higher % around Hollingbury. There is a greater density of households in fuel poverty directly around Jubilee Library and near to Hove Library, where opening hours are proposed to be reduced.



The image above is a screen shot from the Local Insight website, detailing a map of the city and showing the % of household in fuel poverty from the 2021 census. It shows that there are areas of the city with greater densities of fuel poverty. The image also details the location of the city libraries.

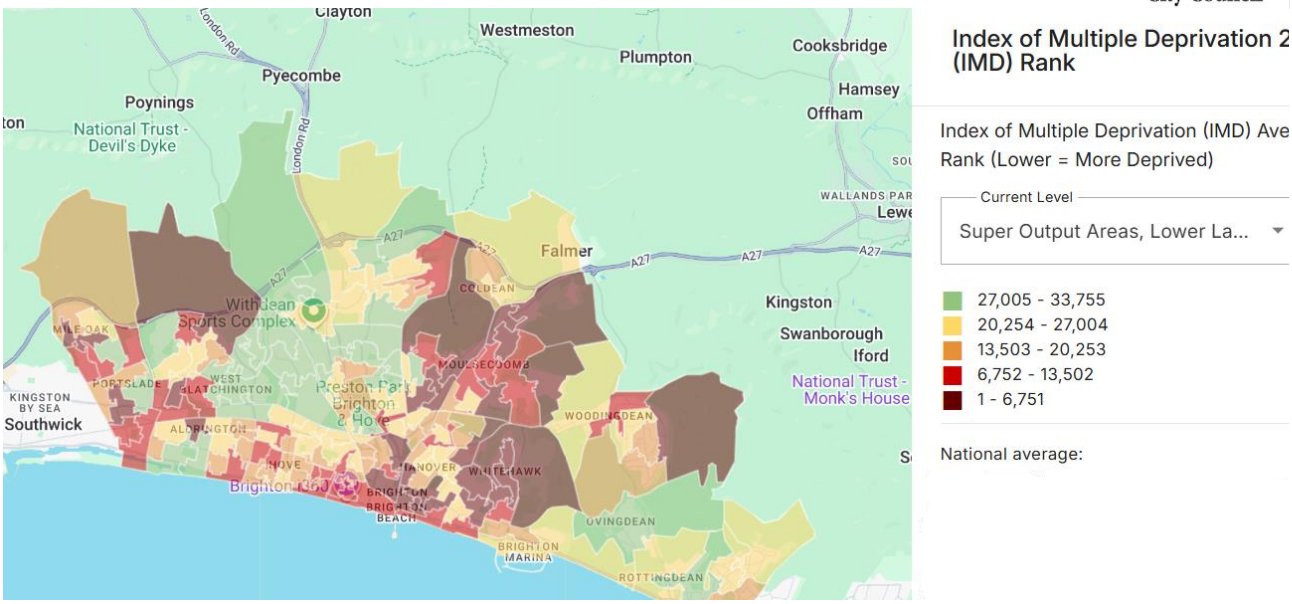
Since the public consultation commenced, more recent Index of Multiple Deprivation data has been released that shows the following:

- Brighton & Hove continues to contain neighbourhoods which are among the most deprived in England, particularly in East Brighton (Whitehawk, Moulsecoomb, Bevendean, Hollingdean, Queen's Park). These areas rank in the top 10–20% most deprived nationally, with some LSOAs (Lower Super Output Areas) in East Brighton falling within the top 1,000 most deprived in the country.
- Compared to other South East authorities, Brighton & Hove continues to stand out for having pockets of severe deprivation alongside areas of affluence. While the city as a whole is less deprived than some northern cities, it is one of only two South East authorities (alongside Hastings) to rank among the lowest 50 nationally for income and employment deprivation.
- The IMD maps and ward-level breakdowns show stark contrasts. For example, Westdene & Hove Park and Rottingdean & West Saltdean are among the least deprived, while East Brighton and parts of Moulsecoomb & Bevendean are among the most deprived. This is shown below in the image which shows the middle layer of super output areas.



The image above is a screen shot from the Local Insight website, detailing a map of the city and showing the rank of indices of multiple deprivation across the city. This is the middle layer of data.

- Brighton & Hove's deprivation is most acute in income, employment, and health domains, but barriers to housing and services are also significant due to high housing costs and limited affordable options.
- The city's overall deprivation ranking has improved slightly in recent years, but persistent pockets remain, and the gap between the most and least deprived areas has not narrowed substantially.
- The IMD 2025 shows that some neighbourhoods around Hollingbury rank among the most deprived in Brighton & Hove, and are well above the national average for deprivation. Westdene, while generally more affluent, contains some groups (for example older adults, carers, and families without cars) who are at risk of isolation and digital exclusion. This is shown below in the image which shows the lower layer of super output areas.



The image above is a screen shot from the Local Insight website, detailing a map of the city and showing the rank of indices of multiple deprivation across the city. This is the lower layer of data.

- Central Brighton shows continued persistent deprivation amongst affluence. While central Brighton includes some affluent neighbourhoods, the IMD 2025 data shows that it also contains LSOAs, ranking among the most deprived in England, particularly in domains such as income, employment, health, and digital exclusion. This means a number of residents who live locally to Jubilee Library and use its facilities will be from for these deprived areas.
- Central Hove is generally more affluent than central Brighton, but the IMD 2025 data reveals that there are still pockets of deprivation, particularly among older adults, carers, and those living on low incomes or with limited access to digital resources. As above, that means that some of those that live locally to Hove Library and use the facilities there, will be from areas of deprivation.

What we heard in the consultation About Disadvantaged People and Those Living in Poverty

Libraries as Equalisers

- Some respondents described libraries as “levellers” or “equalisers” for people living in poverty. Libraries provide free access to books, computers, the internet, and were reported to offer a safe, warm space—and it was recognised that these are resources that many disadvantaged people cannot afford at home.
- Some said that for children and families on low incomes, libraries could be the only way to access a wide range of books, support with homework, and digital resources needed for education, job searches, and benefit applications.

Warmth, Shelter, and Social Connection

- Libraries were described as one of the last remaining free, warm, and safe public spaces in the community. Respondents living in poverty or on low incomes said they rely on libraries to keep warm in winter, to meet others, and to avoid isolation without having to spend money.

- Some mentioned that libraries are important for those who cannot afford to heat their homes, buy books, or pay for internet access.

Digital Inclusion and Practical Support

- Some disadvantaged respondents highlighted the importance of libraries for digital inclusion. Libraries provide free access to computers and WiFi, which are essential for job hunting, accessing benefits, and managing daily life when you cannot afford these at home.

Financial Concerns

- The cost of public transport was frequently cited as a barrier for older people on fixed incomes. Many said that having to pay for buses to reach a more distant library would be prohibitive, especially for regular visits. Some also mentioned that they cannot afford to buy books, making the library an essential free resource.
- Several noted that library staff help with paperwork, printing, and accessing information, which is especially valuable for those who are digitally excluded or have limited literacy.

Impact of Cuts and Closures

- Some said that reductions to library services would “make life smaller” for those already struggling, and that libraries are often the only place where people can go without being expected to spend money.

Children, Young People, and Families

- Respondents stressed that children from disadvantaged backgrounds are particularly at risk if libraries close. For many, the library is the only place to access books, do homework, and participate in free activities. Parents and carers said that libraries help to “level the playing field” for children who cannot afford books or digital devices at home.

Social Mobility and Opportunity

- Libraries were seen by some as crucial for supporting social mobility, providing opportunities for learning, self-improvement, and community engagement for those who might otherwise be excluded due to poverty.

Some quotes from survey respondents, specifically related to living in poverty or being in economic disadvantage

> “Libraries are a crucial third space – used by myself, my partner and almost every single person I know. I cannot afford to buy the books I read, and in a world of increasing cost and reducing opportunity, the library is a literal beacon of opportunity.”
>
> “As a low income family, we are unable to buy a computer and aren't able to buy lots of different books for education and teaching reading purposes, we use the library for those.”
>
> “I am on a low income and it is one of the few spaces in the city I can be without spending money. The proposed changes will effect me a lot, I am very sad to hear about them.”
>
> “Libraries are a vital community service. Not only do they offer free resources for learning and self development but also offer warm spaces and a sense of community to some of the most vulnerable members of our society.”
>
> “Hollingbury library is in a great location for the children being right next to the park. We often use it during a combined visit especially when the weather is changeable. Whilst I can also walk to Patcham, it is a different experience. Hollingbury is a deprived area and when the original library was closed, we were promised a replacement. If we want

children to access books, we have to make it easy for them. They will not access them in Patcham which is at least a half hour walk compared to the Old Boat where you could pop in whilst at the playground or visiting the community pantry."

A summary of potential impacts

- Some people told us that libraries are essential for those who are disadvantaged or living in poverty, providing free access to books, digital resources, warmth, and social connection. Reductions or closures are likely to have a significant negative impact on these groups, increasing hardship, isolation, and educational inequality.

Mitigations

- For each of the proposed library closures there are alternative libraries within 2 miles and the city is generally well served by public transport. For some, these alternative libraries will be walkable and therefore affordable, but not for all.

Promote and Expand Digital Access

- Ensure continued access to computers, WiFi, and printing at remaining libraries. Where possible, increase the number of devices and extend digital support, especially for job searches, benefit applications, and essential online services. Further promotion to be undertaken to highlight the free to use online library service offers to support people when the libraries are closed.

Partnerships with Community Organisations:

- Consider further work with local charities, food banks, schools, and community centres to provide access to books, digital resources, and information in alternative venues.

Warm Spaces and Social Support:

- Publicise and partner with other local "warm spaces" (community centres, churches, etc.) to support people to access safe, free places to go during library closures or reduced hours.

Travel Support and Information

- Provide clear information about public transport options to alternative libraries

Targeted Support for Children and Young People

- Maintain or expand free activities at remaining libraries or partner venues, to ensure children from low-income families continue to have access to educational opportunities.

Digital Literacy Training

- Continue to provide access to volunteer support and work with partners to explore the potential for digital skills workshops and one-to-one support to help digitally excluded residents access online resources, benefits, and job opportunities.

Staff Training

- Ensure staff at remaining libraries and partner organisations are trained to support people facing socio-economic disadvantage, including signposting to relevant local services.

6.17 Human Rights:

Will your activity have a disproportionate impact relating to Human Rights?	NO

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

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

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

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

It is important that we were able to hear from a wide range of residents, customers and stakeholders during the proposed public consultation as this has enabled greater analysis and understanding of the impacts of the final proposals. The data above indicates that there could be a greater impact on residents who are younger, older, disabled and those at risk of socio-economic disadvantage.

Through targeted promotion of the consultation, we've been able to draw out more reflections on the potential cumulative impact there could be of the proposed changes. This includes using an intersectional lens when reviewing the consultation responses and considering how some individuals or communities may experience multiple impacts.

However, several protected characteristic groups appear to be underrepresented or less vocal in the survey which we need to be mindful of when considering equalities implications and any resulting planned actions.

- Race/Ethnicity: While there are some responses from people of Black and Racially Minoritised backgrounds, the majority of responses are from White British respondents. There is therefore less reflection across all areas of the proposals of specific barriers faced by Black, Asian, or other racially minoritised groups.
- Religion or Belief: Although some respondents mention their religion (e.g., Christian, Jewish, Muslim, Buddhist), there is little in-depth discussion of how library changes would impact religious minorities or those with particular faith-based needs. Some respondents referred to having particular philosophical beliefs but very few explicitly linked their philosophical stance to the impact of the proposals.
- Gender Reassignment/Transgender: There are a few references to non-binary and trans identities, but overall, the voices of transgender people are limited compared to other groups.
- Pregnancy and Maternity: While mothers and parents are well represented, there are fewer explicit references to the needs of pregnant women or those on maternity leave, beyond general comments about families and carers.

Intersectional and Cumulative Impacts of Library Service Reductions

Potential for disproportionate Impact on Vulnerable Groups

- Reducing library services could most affect people who are older, younger, disabled, carers, or at risk of socio-economic disadvantage. These groups can rely on libraries for social contact, digital access, learning, and a safe, warm environment

Intersectionality intensifies disadvantage

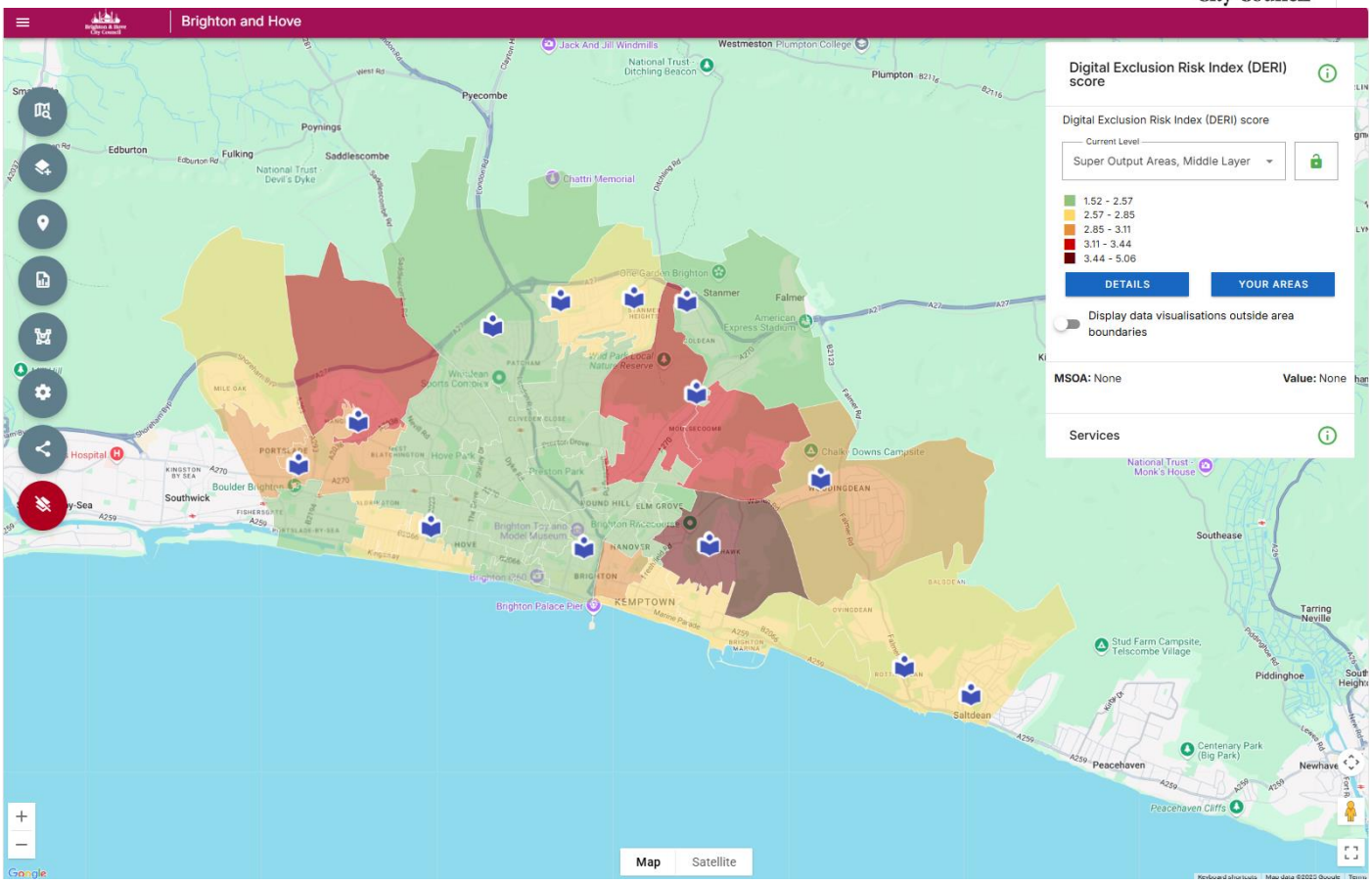
- Individuals with multiple protected characteristics face compounded barriers. The loss of local, accessible library provision can increase isolation, digital exclusion, and can limit access to important services
- Disability + Age: Older adults with disabilities could be particularly affected by the closure of local, accessible libraries. For these users, libraries are not just about access to books, but could also contribute to independence, social contact, and in providing a safe, warm space. They may find travelling to alternative sites more challenging.
- Ethnicity + Digital Exclusion + Low Income: Respondents from Black and Racially Minoritised backgrounds were more likely to mention digital exclusion and low income. Libraries can provide essential digital access, language learning, and community support. Reducing hours at central libraires can mean some people have reduced access to important services and opportunities for social integration.
- Caring Responsibilities + Disability + Gender: Many carers are women, some of whom are also disabled. Reduced library services can mean fewer opportunities for respite, support, and social contact, potentially leading to increased stress and barriers to community participation. They may find travelling to alternative sites more challenging.
- Race/Ethnicity + Disability + Language: Libraries are often one of limited accessible spaces for people who are both from Black and Racially Minoritised backgrounds and disabled, especially those with English as an additional language. A reduction in services can multiply the barriers they face.

Cumulative Effects have the potential to increase disadvantage further / act as a multiplier

- The impact of service reductions multiplies for those with intersecting vulnerabilities (e.g. disability + age + low income). Libraries are more than book lenders—they are important for social connection, digital inclusion, and community support

Digital and social exclusion

- It is recognised that a reduction in library services may have a detrimental impact on residents who are digitally excluded. The image below shows the geographical spread of the Digital Exclusion Risk Index score (which shows risk or likelihood of exclusion) across the city. This shows that there are areas of the city not directly impacted by the proposed closures of community libraries which have higher densities of digital exclusion risk. It is important to note that users of the two central libraries of Jubilee and Hove may come from all over the city so could be impacted by the proposed reduction in opening hours.



The image above is a screen shot from the Local Insight website, detailing a map of the city and showing the digital exclusion risk index across. It also shows the libraries across the city.

- It is important to note that during the public consultation we heard that having a good level of income or being financially secure does not mean people will not be digitally and / or socially isolated. Having financial security does not necessarily reduce the risk of the impact of loneliness. It is also not the case that individuals being financially secure means they have access to a good range of community spaces/resources/support.

- The recent IMD data shows that deprivation is not just about income, but also about access to services, transport, and community resources. For residents in these areas, the local library is often the only walkable, free, warm, and inclusive public space. Closure would disproportionately affect those who cannot afford or physically manage longer journeys to alternative libraries, especially disabled people, older adults, carers, and low-income families.

- Other disadvantaging factors can impact negatively on people's lives too, regardless of financial security, for example impact of domestic abuse.

What we heard about specific proposals – related to protected characteristics.

These impacts are explored in more detail above, however here is a summary of some key points made in relation to protected characteristics groupings, relevant for this EIA.

<u>Proposed reduction in opening hours at central libraries</u>

- Some working age adults felt that the 5pm closing time reduced after-work access time for them, undermining abilities to study, use the computer and printing and access to a quiet space.
- Families with young children were concerned about potential losses of after school and / or weekend access and that this may impact on children's reading as well as family routines and social connection opportunities.
- Some older adults were concerned that reducing opening hours could increase isolation, reduce access to warm spaces and potentially reduce their use of libraries.
- Some disabled adults and those who are neurodivergent highlight the need for staffed, quiet spaces and were concerned that the reduction in opening hours compromised access, safety and confidence in using the space.
- Both central libraries serve a high proportion of disabled users (Jubilee: 18.2%, Hove: 18.8%). Reduced hours would impact some of those with mobility, sensory, mental health, and neurodivergent conditions, who reported in the survey responses that they rely on extended and quieter hours for access and wellbeing.
- Many disabled users are also elderly. Reduced hours could increase isolation and reduce access to safe, warm spaces, especially for older people who may not wish to use unstaffed Libraries Extra hours.
- Reduced hours could make it harder for carers to access library services after work or school, impacting their ability to support those they care for.
- Jubilee and Hove libraries have the most ethnically diverse user base of all branches, including significant numbers of Black, Asian, Mixed, and Other backgrounds, as well as migrants, refugees, and asylum seekers. Reduced hours could limit access to culturally relevant resources and support.
- The libraries serve users from a wide range of faith backgrounds. Reduced hours could affect access to religious materials, quiet reflection, and community events, especially when opening times may not align with religious observances.
- Female users, especially those with caring responsibilities, could be disproportionately affected, as reduced hours limit access to family-friendly facilities and support.
- The libraries are described by some respondents as essential safe spaces for LGBTQ+ users. Reduced hours would limit access to affirming environments, community events, and support, potentially increasing isolation for LGBTQ+ individuals.
- Trans, non-binary and gender-diverse users express concerns about safety and inclusion during unstaffed hours.
- Many users experiencing poverty, digital exclusion, or homelessness can partially or completely rely on the libraries for free access to computers, Wi-Fi, and support with benefits and job applications. Reduced hours could exacerbate digital exclusion and financial hardship.
- The libraries can provide essential facilities (toilets, shelter, charging points) for people experiencing homelessness or insecure accommodation. Reduced hours could remove a valued safe space during some evenings and weekend afternoons.
- Across all groups of respondents, some described libraries as important for mental health, social contact, and community connection. Reduced hours risk increasing isolation, stress, and negative mental health outcomes.

Proposed closure of Hollingbury Library

- Hollingbury Library is considered accessible for disabled residents, offering step-free access and proximity to essential services. Closure could affect disabled adults and children, who may face barriers in travelling to alternative libraries due to long, hilly walks and limited direct public transport.
- The library is a described by some as a “lifeline” for elderly residents, who may not be able to travel further to alternative libraries, and for families with young children who rely on combined visits to the library, playground, and nearby food bank. Closure could increase isolation and reduce access to educational resources for both groups.
- Hollingbury serves a more ethnically diverse community than some other community libraries, with a higher proportion of Black, Asian, Mixed and Other backgrounds. Some Black and Racially Minoritised families may rely on the library for access to culturally relevant books, computers, and events, language learning, and social connection. Closure could impact these families, increasing isolation and digital exclusion.
- The library supports a more religiously diverse community than some other community libraries, including Muslim, Jewish, Hindu, and Buddhist families. It provides access to some religious education materials and the library has been described as a safe space for some faith-based families. Closure could affect these groups, especially those on low incomes or with limited transport options.
- Some female respondents, particularly carers and older women, described the library as an important space for social contact, respite, and children’s literacy. Closure could impact women, especially those who are carers, disabled, or on low incomes.
- Some carers, especially those supporting disabled children or elderly relatives, rely on the library for support and social connection. Closure could increase isolation and stress for carers, particularly those without access to a car.
- The library serves a community with high deprivation, financial hardship, and digital exclusion. It is a valued, free, warm space for those experiencing poverty or homelessness. Closure could increase isolation, reduce access to digital resources, and remove a support hub for the most vulnerable.

Proposed Closure of Westdene Library

- Westdene Library serves a proportion of disabled users. 17% of survey respondents who use Westdene Library told us they are living with a disability or limiting health condition which is approximately reflective of census data. Closure could affect those with mobility issues, as other libraries may not be seen as viable alternatives due to distance, steep hills, bus connections and limited free parking.
- While the user group is predominantly White British, there are respondents from Black and Racially minoritised backgrounds. Some of those families, especially those less likely to own a car, could be affected by the loss of a local, walkable, and inclusive library.
- Some female respondents, particularly mothers and grandmothers, described the library as essential for after-school visits and as a safe space for children.

- Some LGBTQ+ respondents, including families with children at the local school, described Westdene as a safe, inclusive space. Closure could affect LGBTQ+ people who may not have access to a car or feel less comfortable in other venues.

- Carers (especially mothers, grandmothers, and those caring for disabled or elderly relatives) may rely on Westdene for respite, support, and social connection. Closure could increase isolation and stress for carers, particularly those on low incomes or without access to a car.

- Despite perceptions of affluence and the low scores on the Index of Multiple Deprivation, Westdene is also home to low-income families, single parents, and older people living in poverty. The library provides free resources and social contact; closure could impact those unable to afford paid activities or travel further afield.

- Westdene Library is described by some as the only free, safe, warm space in the area, acting as a community hub. Closure could increase digital exclusion, isolation, and reduce access to books, computers, and social contact for disabled and vulnerable residents.

7. Action planning

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

Ensure communications about any agreed changes to library services are fully accessible to all affected groups.

- Develop an accessibility statement for communications in January 2026
- Ensure information about service changes are provided in digital and paper formats.
- Provide information about service changes in accessible formats as requested (plain English, Braille, Easy Read, BSL, translated into different languages).
- Conduct accessibility audits on identified alternative libraries to those which may close
- Plan and host ‘welcome events’ and informal inductions at alternative libraries.
- Promote the online 360 tours to help users familiarise themselves with new spaces.
- Develop a promotion strategy for Libraries Extra, ensuring all who use a library which is closing have every opportunity to use Libraries Extra in the future.

Continue with targeted engagement and support for vulnerable groups about the changes and how to access alternative services

- Maintain proactive engagement with vulnerable and underheard groups (including older people, disabled, carers, minority ethnic communities, migrants, socio-economically disadvantaged). This supports open communication channels through which to promote changes, alternative library options etc.
- Develop a statement to use in all libraries where changes have been agreed, to ensure signposting to good alternatives is clear
- Maintain seven-day access at Jubilee Library, and at community libraries through Libraries Extra, to ensure there is a comprehensive offer all week

- Expand and target promotion of Home Delivery Service for older people, disabled people, and carers who may lose access to local libraries
- Communicate to schools/colleges near libraries affected by service reduction to keep them informed about potential impact on children and young people's ability to study and use library resources at those times
- Further promote online offer of eBooks, eAudiobooks, and online resources for all users, especially when libraries are closed
- Targeted promotion of city-wide facilities supporting sensory needs and disabilities including promotion of Large Print and eAudiobooks for visually impaired users
- Promote and expand access to computers, WiFi, and printing at remaining libraries
- Support regular groups who book space in libraries affected to find alternatives at other times or in other libraries
- Actively promote concessionary library membership for full-time carers and disabled people (longer loan periods, lower fees)
- Consider promotion across libraries about which sites have accessible / gender neutral facilities so users can make informed choices about which alternative sites to use
- Retain existing and publicise gender-neutral facilities
- Proactively inform networks and groups that support care experienced children and young people about changes
- Provide clear information about public transport options to alternative libraries. Highlight bus routes serving areas affected by closures.

Establish way of monitoring any impacts and of reviewing and adapting mitigating actions as required

- Continue to facilitate library service staff to access training and development opportunities focussed on supporting people facing disadvantage and marginalisation, including signposting to local services.
- Develop a manageable way of monitoring the impacts of closures and reduced hours on protected and vulnerable groups, informed by feedback and data collected during the consultation
- Consider ways of expanding equalities monitoring across the library service, building in a focus on intersectional analysis if possible. This data can then inform further mitigating actions and adjustments as needed.
- Explore the potential other models set out within the public consultation and ensure the findings of this EIA inform those considerations
- As part of business-as-usual work within the Library Service we'll continue to review accessibility of libraries, but especially those identified as alternatives for those impacted by closures. This will also be a key way of informing the future strategy for the city's libraries.

Through inclusion in action plans (see below) and through discussions at Library Service Management meetings, consider how progress on these actions can be reported to senior council officers to ensure oversight and holding accountability of these agreed actions.

Which action plans will the identified actions be transferred to?

- The library service business plan for Q4 in 25/26 and the plan for 26/27

- The Families, Children and Wellbeing Fair and Inclusive Action Plan
- At the appropriate time, the new Library Strategy for the City

8. Outcome of your assessment

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

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

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

This assessment explores what we know about the city population and how this needs to inform the decision making and then implementation of changes to city library provision. Actions are identified to increase and enhance underheard and underserved community voices and to minimise the impact of any changes on those protected characteristics at risk of negative impact.

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

A range of mitigations have been identified to offset the impact of reductions in public library services. These are explored in more detail in the Equalities Impact Assessment; they can broadly be summarised as:

- Ensure communications about any agreed changes to library services are fully accessible to all affected groups.
- Continue with targeted engagement and support for vulnerable groups about the changes and how to access alternative services
- Establish a way of monitoring any impacts and of revieing and adapting mitigating actions as required

9. Publication

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

N/A – this is to be a public document

10. Directorate and Service Approval

Signatory:	Name and Job Title:	Date: DD-MMM-YY
Responsible Lead Officer:	Anna Gianfrancesco	27/12/2025
Accountable Manager:	Ceris Howard	27/12/2025

Notes, relevant information, and requests (if any) from Responsible Lead Officer and Accountable Manager submitting this assessment:

EDI Review, Actions, and Approval:

Equality Impact Assessment sign-off

Signatory:	Name:	Date: DD-MMM-YY
EDI Manager:	Deborah Totney	27 November 2025

Notes and recommendations (if any) from EDI Manager reviewing this assessment:

Brighton & Hove City Council

Cabinet

Agenda Item 87

Subject: **Our City Transport Plan 2035**

Date of meeting: **Thursday, 11 December 2025**

Report of: **Cabinet Member for Transport & City Infrastructure**

Lead Officer: **Alison Mcmanamon, Corporate Director- City Operations**

Contact Officer: **Name: Andrew Westwood**

Email: Andrew.Westwood@Brighton-hove.gov.uk

Ward(s) affected: All Wards

Key Decision: Yes

Reason(s): It 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 report updates members on the development of Our City Transport Plan 2035, with a focus on the changes made to the draft document following public consultation. The adoption of Our City Transport Plan 2035 as a council policy will deliver on a commitment made in the Council Plan 2023-27, to develop and launch a new ten-year strategy setting out a long-term vision for the city's transport network and a pipeline of transport projects to deliver this vision.

1.2 The English Devolution and Community Empowerment Bill, currently being debated in Parliament, once made law, will create a Mayoral Strategic Authority covering Brighton & Hove and the wider Sussex region. The Mayoral Strategic Authority will be in place by May 2026. The Act will also transfer responsibility for creating a 'Local Transport Plan' from Brighton & Hove City Council to the Mayoral Strategic Authority. Our City Transport Plan 2035 will act as a tool to communicate what Brighton & Hove's transport needs are to the Mayoral Strategic Authority, our residents and stakeholders.

2. Recommendations

2.1 Cabinet agrees to adopt Our City Transport Plan 2035 (Appendix 1) as the city's over-arching transport policy.

3. Context and background information

3.1 Development of Our City Transport Plan 2035 started four years ago with the preparation of a document called 'Developing a new Transport Plan for

Brighton & Hove'. A public consultation on this document was held in autumn 2021, the results of which were reported to the Environment, Transport & Sustainability Committee in March 2022. This policy development was timed to coincide with the planned release of updated guidance on preparing Local Transport Plans from the Secretary of State.

3.2 Changes in Government led to a delay in the publication of the guidance. In response the council paused work on transport policy development. But as the council's existing long-term transport strategy (Local Transport Plan 4) became increasingly in need of an update, work resumed on the new strategy. Our long-term transport strategy is the basis of our annual transport capital investment programme so needs to be current.

3.3 Our City Transport Plan 2035 was aligned with national transport policies and made use of tools developed for local transport authorities. For example, the impact our policies will have on carbon emissions has been assessed using a Carbon Assessment Playbook developed by Transport for the South East (TfSE). This is because the DfT policy 'Decarbonising Transport' made a commitment to 'drive decarbonisation and transport improvements at a local level by making quantifiable carbon reductions a fundamental part of local transport planning and funding'.

3.4 The draft version of Our City Transport Plan 2035 was based on the document 'Developing a new Transport Plan for Brighton & Hove'. Changes were made to align it with subsequent council policies, such as the Council Plan 2023 - 2027 outcomes and the Accessible City Strategy. A detailed evidence base, provided in Appendix 2, was also produced to support the development of the plan. The vision it seeks to deliver is for **getting around a cleaner, fairer and growing city**.

3.5 The draft plan identified five key challenges the city faces. It sets out six objectives to address these challenges and deliver the plan's vision. It also contains a short-term delivery plan of schemes. These are summarised below. Where text is in red, this highlights changes from the draft document that was consulted on.

1	Enabling more people to live safer, healthier and more active lives
2	Reducing congestion ~~Improving the flow of traffic~~ on our roads.
3	Supporting the transition to zero and ultra-low emission transport
4	Creating a transport network that is more inclusive
5	Maintaining our roads and managing them as efficiently as possible

Table 1: Challenges identified in our City Transport Plan 2035

1	Increase public transport use
2	Enable the uptake and use of zero and ultra-low emission ~~vehicles~~ transport
3	Deliver a safe, inclusive and integrated transport system
4	Create well-maintained streets, pavements and rights of way
5	Provide active travel choices for all and excellent public spaces
6	Promote and use technology to reduce and manage travel

Table 2: Objectives of Our City Transport Plan 2035



Figure 1: Summary of capital projects and ongoing works proposed in Our City Transport Plan 2035

3.6 The consultation results indicate broad support for the challenges and objectives. They remain largely unchanged, although the challenge of 'Improving the flow of traffic on our roads' has been amended to 'Reducing congestion on our roads' to make it clear that congestion is the issue that needs to be tackled.

3.7 Other changes that have been made in response to feedback received during the consultation are:

- Creation of a new scheme ‘Improving the look and feel of the city’. This will increase the amount of funding spent on delivering improved pavements and roads, which was the best supported objective.
- Providing greater detail of what is planned around the objective of ’Promote and use technology to reduce and manage travel’, given this was the least supported objective.
- A new commitment to publishing a streetscape design guide. This will address issues around the consistency and standards of street works, cover accessibility standards and set out when new street trees will be introduced and what climate change mitigation is appropriate to be introduced.
- Additional detail, on areas such as rail, powered two wheelers, e-scooters and parking policy.
- Including an indicatively costed 3-year delivery plan, based on the current transport capital programme (noting that the programme is approved annually and subject to future funding availability and cabinet decisions).

3.8 All schemes included in the draft plan remain in the final version. Notable schemes include the ambition to create strategic mobility hubs on the edge of the city. A core part of any mobility hub would be provision of Park & Ride, which will reduce the need to drive into the city and alleviate congestion in the city centre. There is also the ambition to deliver a Sussex Coast Mass Rapid Transit system. This would be a high-capacity public transportation system designed to move large numbers of people efficiently across Brighton, Hove and neighboring coastal towns.

3.9 The plan also commits to developing a road safety action plan to focus on actions that will reduce the number of people killed and seriously injured on our roads.

4. Analysis and consideration of alternative options

4.1 There is a statutory duty to ensure the council has a robust and evidence-based transport strategy, which in future will allow us to effectively engage with the new Mayoral Strategic Authority as the statutory duty for a Local Transport Plan will sit at mayoral level. While the policies within Our City Transport Plan 2035 must conform with national and regional policies there is scope within this for alternative schemes, than those chosen, to be taken forward.

4.2 As part of the assessment of the emissions reductions impact the policies will result in alternative scenarios have been looked at using the Carbon Assessment Tool. The three most effective measures to reduce emissions would be cordon based charges & restrictions, provision of EV infrastructure and road user charging and tolls.

4.3 In order to provide equitable choices for local journeys, measures within the plan allow people to choose the mode of transport that suits them best and

have a strong focus on improving accessibility for all. Measures which place access restrictions on motor vehicles, such as zero emission zones, have not been included within this plan. Currently zero emission vehicles are more expensive to purchase so large-scale restriction-based measures that favour these vehicles are not included in the plan.

5. Community engagement and consultation

5.1 Public consultation on developing a new long term transport strategy for the city was first undertaken in 2021. The council published and sought views on a document termed 'Developing a New Transport Plan for Brighton & Hove'. The results of this consultation were reported to Environment, Transport & Sustainability Committee on 15 March 2022.

5.2 National government had announced that they would issue new guidance for local authorities on how to develop new Local Transport Plans by spring 2022[1]. This publication date was pushed back, and we paused development of our transport policy to await the publication until it became clear that the delay could be indefinite. We drafted Our City Transport Plan and held a 12-week public consultation on it between 18 June 2025 and 12 September 2025.

5.3 The consultation was carried out in line with the Community Engagement framework, ensuring:

- Evidence-based proposals, supported by data.
- Inclusivity, engaging a wide range of residents and groups.
- Clarity of purpose, with clear explanations of why input was sought.
- Timing & resources, with a full 12-week consultation period and tailored activities for different groups, including young people.
- Accessibility, though multiple formats and venues.
- Communication & partnership, with feedback shared openly with stakeholders.

5.4 The main channel for the consultation was a survey hosted on the council's consultation platform, Your Voice. This was promoted through the council's website and social media, posters in community venues and direct contact with stakeholder groups. There were also multiple opportunities for people to speak directly with officers. These included:

- 1 a week-long public exhibition and 7 public drop-in sessions held in libraries.
- 11 workshops/ meetings with stakeholders including five schools, and stakeholder groups including the Transport & Travel Partnership, the Local Access Forum and the Destination Experience Group.
- A dedicated session with the Get Involved Group (organised by Possability People) to gather feedback from disabled people.
- 500 responses via the Your Voice online survey (paper copies were also available).

[1] The Transport Network

5.5 Views were sought on whether the challenges identified in the plan were ones that people agreed were the priority to focus on and whether the objectives in the plan were supported. As detailed in the consultation report in appendix 3. There was over 70% support for each of the challenges. Support for the objectives ranged from 48% - 73%, with support strongest for “well-maintained streets” and “providing active travel choices for all and excellent public spaces”.

5.6 The public were also invited to rank project priorities. “Subsidising public transport to make it more affordable” and “Improving priority routes for active travel (walking, wheeling and cycling)” received the strongest support which aligns with the headline survey results, while “Installing electric vehicle chargepoints” and “New transport hubs at the city’s edge offering Park & Ride, EV charging, vehicle hire and help reduce city trunk traffic” received the least.

5.7 The public were able to provide their additional comments in the online survey. Below are the themes raised the most which are also consistent with the above results.

- Concerns about bus affordability, frequency, and reliability
- Traffic congestion, particularly in the city centre
- Strong calls for better road and pavement maintenance
- Support for active travel and safer cycling routes
- A view that EVs alone won’t solve congestion or wider environmental challenges
- Interest in Park & Ride and mass rapid transit schemes
- Desire to reduce car use and overall traffic levels

5.8 This feedback was used to inform amendments to the draft document, along with comments provided by members of the Overview & Scrutiny Committee, who reviewed the plan at their meeting in October 2025.

6. Financial implications

6.1 Having an agreed long term City Transport plan is required to qualify for the significant sums of external funding needed to implement the proposals outlined in the plan. While there are ambitious schemes proposed within the plan, it is anticipated that with the plan agreed the service would be able develop a business case for each one and secure the grant required.

6.2 There are no direct financial implications arising from this report, all funding levels included in the plan are indicative. The purpose of this report is to enable future schemes to be considered for submission as part of the transport capital program. Each of those proposals will have their own reports issued clearly setting out the business case to confirm the budget implications for each scheme once the level of external grant funding is known.

Name of finance officer consulted: David Wilder Date: 19/11/2025

7. Legal implications

7.1 While this plan followed extant guidance and requirements relating to preparing a Local Transport Plan, It is understood that beyond May 2026 it will not be considered a Local Transport Plan, as defined by the Transport Act 2000 (subsequently amended by the Local Transport Act 2008) because the English Devolution and Community Empowerment Bill, once made law, will transfer responsibility for creating a 'Local Transport Plan' from Brighton & Hove City Council to the Mayoral Strategic Authority.

7.2 This report is asking for the Council to adopt this Plan under the current legislative requirements that have been complied with.

Name of lawyer consulted: Katie Kam Date: 13/11/25

8. Risk implications

8.1 Key risks relating to the approval of this report have been assessed in accordance with the council's risk management guidance. Mitigating actions have been identified to reduce all risks to the lower ("green") level, except for the uncertainty about long-term funding which will continue to remain uncertain. A lack of funding could significantly impact the future delivery of projects and services.

8.2 Should the recommendation to adopt Our City Transport Plan as council policy not be enacted it could weaken our ability to bid for funding that the DfT award on a competitive basis. It could also make engagement with the new Mayoral Strategic Authority difficult in terms of setting out the transport challenges and needs of the city.

9. Equalities implications

9.1 Accessibility is a key issue in transport particularly for disabled people and older people, who are more likely to experience age-related disability. Our Equality Impact Assessment (EIA) also considered impacts on groups beyond those who have protected characteristics. Our evidence base highlighted the outsize impact that transport availability has on low-income groups.

9.2 Feedback was received from a workshop with Possability People's Get Involved Group and written feedback from the Brighton & Hove Older People's Council. The EIA has been updated to focus on the impacts of the transport plan on these groups, which share similar accessibility challenges. The updated EIA accompanying the final version of Our City Transport Plan 2035 is provided as Appendix 4 to this report.

9.3 Feedback highlighted concerns about unsafe pavements, crossings and shared space where reckless cycling posed perceived safety risks to pedestrians. Participants also reported difficulty accessing some bus stops due to long distances between stops.

9.4 The council is working to improve city centre walkability, maintain pavements and install more dropped kerbs to enhance accessibility and reduce trip hazards for everyone, particularly older people and those with mobility issues. The new commitment to publish a streetscape design guide is intended to improve how accessible our streets are for disabled people.

9.5 The Bus Service Improvement Plan which sits underneath the transport plan, includes proposals for 2025 and beyond to enhance the bus network and services, including improvement to bus stops and network coverage which may address concerns about bus accessibility. Disability group representatives have expressed a desire to be properly engaged in the consultation process.

10. Sustainability implications

10.1 The sustainability implications checklist has been completed for the transport plan. Overall, the plan will have positive impacts on sustainable travel and transport, as well as on health, safety, wellbeing and local communities.

10.2 The draft version of Our City Transport Plan 2035 underwent a strategic environmental assessment, (Appendix 5). This found that the likely effect of the plan on the environment ranged from minor positive to significant positive, with the exception of the effects on; land, soil and waste, water resources and quality, which are unknown. The effects on historic environment are likely to be both positive and negative.

10.3 The SEA has been circulated to Historic England and Natural England for comment. Historic England was content with the report which covered the issues that may arise to impact on heritage assets and Natural England advised that there are no significant issues related to their remit.

10.4 In addition, we have assessed the impact of our policies on carbon emission reductions using the Carbon Emissions Playbook (developed by sub-regional transport bodies to be used by all English local authorities for this purpose) and found that they all have a positive impact. However, the level of emission reduction looks to be insufficient for national targets to be met, if we assume that other local authorities perform similarly to us. This was also the case even under a scenario when all carbon reduction policies were maximized and suggests that greater measures at the national level are required.

11. Health and Wellbeing Implications:

11.1 Impacts on human health were considered within the environmental report (appendix 5) on Our City Transport Plan 2035. It was judged that the plan would have a significant positive impact, due to the focus on active travel, improving air quality and road safety.

11.2 The health and wellbeing implications checklist has also been completed for the transport plan. Overall, the plan will have positive impacts on creating

healthy places and communities as well as improving access to fair education, employment and transport. The plan assists in delivering the council's Joint Health & Wellbeing Strategy and Physical Activity Strategy.

11.3 As noted in the sustainability impact section, the proposals will help residents lead more active and healthy lives and contribute to a less stressful and healthier environment. By delivering a safe, inclusive and integrated transport system (another objective in the plan), the plan will improve access to education, employment, social connections and leisure opportunities.

Other Implications

12. Procurement implications

12.1 There are no direct procurement implications arising from this report. The policies and projects contained within Our City Transport Plan 2035 do not commit us to any procurement activity. Projects would be subject to their own procurement process, for which various framework agreements are available.

13. Crime & disorder implications:

13.1 While personal safety consideration affects how people travel, the policies within Our City Transport Plan 2035 show no significant implications on the council's statutory duty (s17 Crime and Disorder Act 1998) to do all they can to reasonably prevent crime and disorder.

13.2 It tends to be at the scheme level, where the design of our urban realm is considered that there are opportunities to improving safety and design out crime.

14. Conclusion

14.1 We have undertaken a robust exercise to determine what challenges the city faces and what objectives and schemes will address them. Adopting Our City Transport Plan 2035 as the council's overarching transport policy will set out the city's transport challenges and objectives ahead of engaging with the Mayoral Strategic Authority from May 2026.

Supporting Documentation

1. Appendices

1. Our City Transport Plan 2035
2. Our City Transport Plan 2035 – Supporting Evidence Base
3. Our City Transport Plan 2035 – Consultation Report
4. Equality Impact Assessment for Our City Transport Plan 2035
5. Environmental Report for Our City Transport Plan 2035
6. Table of risks

Note that this document highlights where changes have been made from the draft version of Our City Transport Plan 2035. A clean version, of the final plan will be published on the council website after Our City Transport Plan 2035 has been approved.

~~Deleted text is shown using strikethrough~~

New text is shown in red.

The costs included in the three-year delivery plan are indicative, based on funding we received in 2025/26. We are yet to receive confirmation of our funding settlement for 26/27 onwards and the capital programme delivery plan will be confirmed through a separate cabinet decision.

Foreword

Travel is a means to an end. People undertake most journeys for a purpose, be that shopping, visiting friends, getting to work or school. In the same way, Our City Transport Plan 2035 is a means to achieving the wider outcomes we want for Brighton & Hove:



Councillor Trevor Muten, Cabinet member for Transport and City

- a growing economy, including our visitor, night-time and innovation sectors
- a fairer, more equitable, accessible and inclusive city
- a city that has low emissions, clean air and is sustainable
- a city that is easy to get around, with well- run services

Our City Transport Plan 2035 sets out an ambitious vision for getting around a cleaner, fairer and growing city over the next decade. By 2035 more people will choose to make more of their journeys within the city by active travel (walking, wheeling, cycling) and public transport, because it will be safer, quicker and more convenient for them to do so. To achieve this, we will improve our public spaces, pavements, cycle infrastructure and key routes. With more people choosing active travel and public transport we can make better use of our road space which will help reduce congestion and delays on our roads, benefiting all users.

By 2035 all new vehicles sold in the UK must be zero emission. Petrol and diesel vehicles are already being replaced by electric ones and by 2035, if not sooner, more than half of the vehicles in Brighton & Hove will be electric. This huge change will require an increase in electric vehicle chargepoints. The shift to electric vehicles will make the single biggest contribution to reducing carbon emissions from our transport network, helping the UK meet its global commitments to tackling climate change. It will also mean that the air we breathe is cleaner. Brighton & Hove City Council are already one of the leading local authorities for providing electric vehicle chargepoints and have ambitious plans to provide even more, so that people can be supported to make the choice to switch to greener transport. We are determined that this transition to a cleaner transport system will be done in a way that doesn't exclude or leave behind those on low incomes or who are otherwise at risk of being marginalised. The city needs to remain a welcoming place, that is open for businesses and visitors.

After years of underfunding for local authorities, we are entering a new era of devolved government. For Brighton & Hove and the wider Sussex area the proposal is to establish a new Mayoral Strategic Authority, with responsibility for strategic transport across the region. It is our hope that the devolution of powers to this new regional body, and the associated re-organisation of local government,

will provide fresh impetus to deliver ambitious schemes, such as purpose-built Park & Ride facilities for the city. This document sets out what we wish to see delivered in the coming 10 years.

Executive Summary

Our City Transport Plan 2035 is the council's over-arching transport policy for the coming decade. ~~This is a draft version of the plan that we are seeking people's views on through a public consultation.~~ It sets out our strategic vision for getting around a cleaner, fairer and growing city. To achieve this vision, there are five key challenges that we need to address.

Challenge 1: Enabling more people to live safer, healthier and more active lives

Challenge 2: Reduce congestion ~~Improving the flow of traffic~~ on our roads

Challenge 3: Supporting the transition to zero and ultra-low emission transport ~~vehicles~~

Challenge 4: Creating a transport network that is more inclusive

Challenge 5: Maintaining our roads and managing them as efficiently as possible

Challenge 1: Enabling more people to live safer, healthier and more active lives. Our City Transport Plan 2035 has been written to work in harmony with the objectives that have been set out in the Council Plan 2023-2027. This has four outcomes, one of which is for Brighton & Hove to be a healthy city where people thrive. By providing attractive public spaces that are safe and easy to get around by active travel, we will enable more people to choose to incorporate physical activity into their day. While the number or people killed or seriously injured on our roads is relatively small, fears about road safety are a significant barrier for many people adopting more active travel. We are also aware that some pavements in the city can be narrow or in poor condition.

We want to give more people the option of choosing active travel by providing infrastructure, like protected cycle lanes and attractive well-maintained pavements, that make people feel safe and provide them with the support and training to feel confident in travelling actively. We also want to reduce further the number of people killed or seriously injured on our roads by 2035.

Challenge 2: Reducing congestion ~~Improving the flow of traffic~~ on our roads. Brighton & Hove is a great place to be, but our road network struggles to cope when there are lots of people on the move at the same time. At busy times congestion causes delays which affects all users including businesses and our visitor economy. The space allocated to roads in the city is relatively fixed, this plan does not advocate extensive new roadbuilding, therefore we need to strike a balance between different road users' needs. Advances in technology will also enable innovative

solutions utilising technology such as Artificial Intelligence (AI) within network management of the city's strategic roads.

Our approach will be to encourage more efficient use of the road space we have. Buses and active travel are the most efficient forms of transport and suitable for many short trips. We aim to provide mobility hubs, that will improve access to public transport, car clubs and other shared transport. Strategic mobility hubs on the edge of the city can provide Park & Ride facilities for those visiting and commuting, while smaller neighbourhood mobility hubs can provide easy access to public transport, car or bike hire.

Challenge 3: Supporting the transition to zero and ultra-low emission transport ~~vehicles~~.
Switching away from petrol and diesel-powered vehicles is the single most important measure that will improve local air quality and reduce carbon emissions from transport. ~~For heavy vehicles there is still uncertainty about whether the switch will be to hydrogen or electric vehicles (EVs). For cars and vans however,~~ The switch to EVs is already taking place, with about 22% of new car sales in 2025 being battery EVs. These vehicles are commonly refueled when parked. Fifty-four per cent of households in Brighton & Hove lack off-street parking and the council will play a key role in providing the necessary charging points for these households that own vehicles[1]. Alongside Our City Transport Plan 2035, we are developing a dedicated Electric Vehicle Charging Plan, setting out exactly how we will address this challenge.

Challenge 4: Creating a transport network that is more inclusive. Disabled people and those on lower incomes make fewer trips than the general population. In part this is because these groups find travel harder to access. We will focus our resources on reducing barriers that these people face. We commit to updating our streetscape design guidelines. We will do this in close consultation with groups representing disabled people in the city. There are areas of the city where people on low incomes are at greater risk of transport-related social exclusion because it is difficult to access basic services and employment without a car. We will continue to provide and aim to enhance subsidised bus services to these areas. We will also focus our resources on improving the accessibility of our city for disabled people.

Challenge 5: Maintaining our roads and managing them as efficiently as possible. This is a major challenge. Over the past decade the money we received from central government, which is ring-fenced for roads maintenance, has been insufficient. With other local authority funding also in decline over the past decade, we have not been able to increase the amount we spend on roads maintenance without it impacting on other council services. Without adequate investment, the condition of our roads will continue to get worse.

We will continue to use the resources we have in the most efficient way possible and deliver new schemes that cost less to maintain. This includes lane rental charges for utilities digging up our roads to incentivise them to minimise disruption. However, this

[1] Zapmap & Field Dynamics, 2024. National Map of EV Charge Point Coverage.

challenge is not something that the council can solve by ourselves. We will also make the case to central government for greater investment in our local roads to reverse the decline they have suffered. In addition, managing our roads is a key challenge and we can look to future technology solutions to help manage our busy network.

To address the 5 challenges, Our City Transport Plan 2035 focuses on 6 objectives. Each of these addresses one or more of the above challenges we face.

	Challenge				
Objective	**Safer, healthier lives**	**Reduce Congestion**	**Zero emission vehicles**	**Inclusive transport**	**Maintain roads**
1. Increase public transport use	✓	✓		✓	
2. Enable the uptake and use of zero and ultra-low emission transport	✓		✓		
3. Deliver a safe, inclusive and integrated transport system	✓			✓	
4. Create well-maintained streets, pavements and right of ways	✓			✓	✓
5. Provide active travel choices for all and excellent public spaces	✓	✓		✓	
6. Promote and use technology to reduce and manage travel		✓	✓		✓

Table 1: How Our City Transport Plan objectives meet the challenges we face

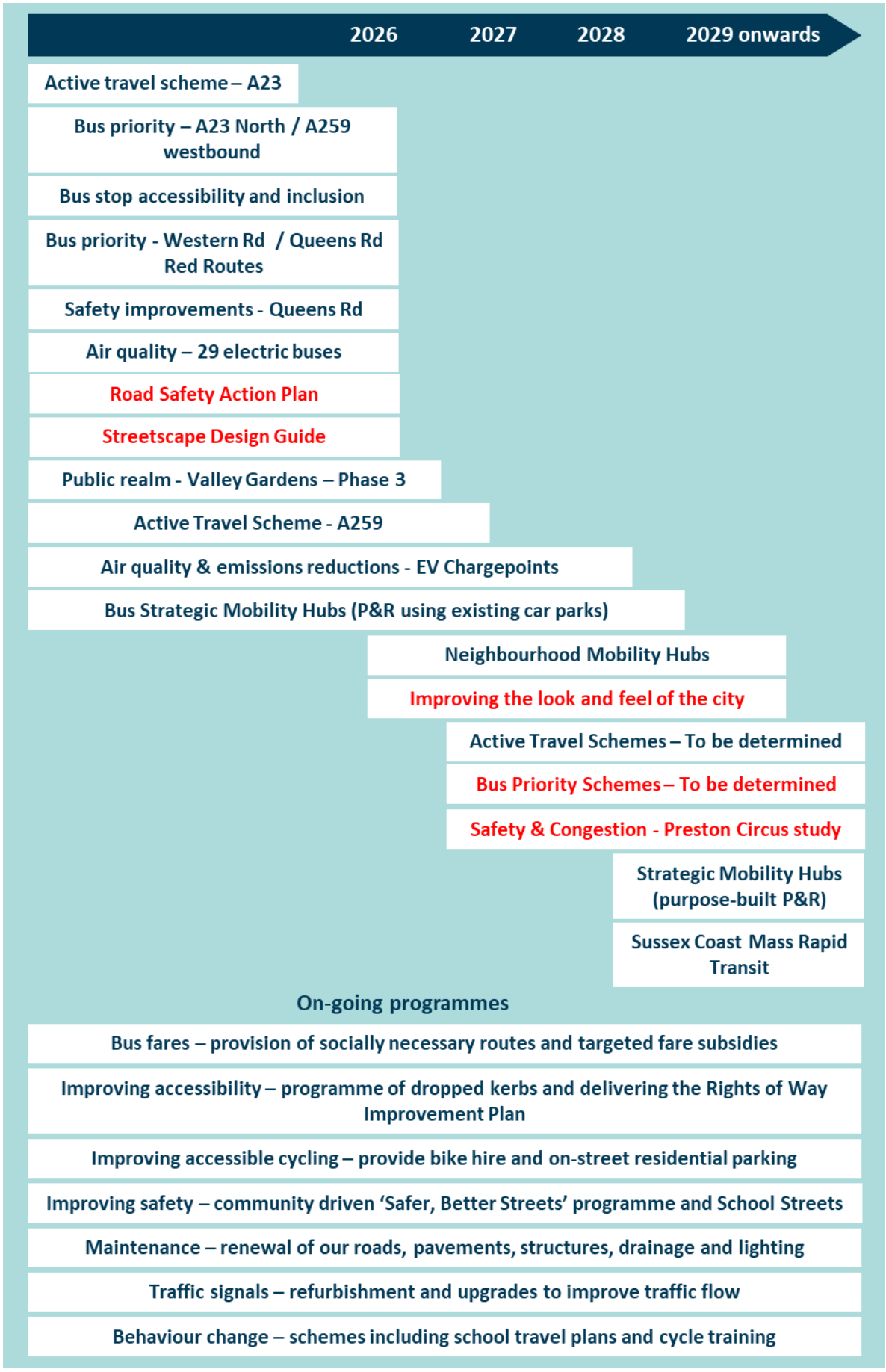


Figure 1: Summary of capital projects and ongoing works proposed in Our City Transport Plan 2035

Introduction

How and why we are writing Our City Transport Plan 2035

Our City Transport Plan 2035 guides how we will spend the funding we receive from Government to improve transport in the city. It is our over-arching transport policy document, which replaces our fourth Local Transport Plan (LTP4), adopted in 2015. At the time of writing, the creation of a new regional governmental body, the Sussex Mayoral Strategic Authority, is anticipated to take place in the spring of 2026. This body will be responsible for producing a 'Local Transport Plan' for the wider region. Our City Transport Plan 2035 is designed to inform the Mayoral Strategic Authority, along with other stakeholders and residents, how we plan to deliver our vision for **getting around a cleaner, fairer and growing city**.

In addition to setting objectives to achieve this vision this plan contains a short-term programme of work for specific transport schemes we plan to deliver. Delivery of this programme of work will depend on how much funding the council receives, and any funding referred to in this plan is indicative. Confirmation of the funding we will receive typically occurs shortly before the start of the financial year. We will update the programme of work included in this plan by publishing an annual capital programme for transport schemes. The capital programme will be approved by cabinet - the council's executive decision-making body, made up of elected councillors. The schemes in the capital programme will be designed to achieve the objectives set out in this plan.

Accompanying this plan are policies that set out greater detail for specific areas. For example, our Bus Service Improvement Plan (BSIP) focuses on improving bus travel in the city. We receive a dedicated grant to implement the BSIP and use this funding to deliver targeted cheaper fares, new bus lanes and other infrastructure. The BSIP is regularly reviewed and updated as the feasibility of potential new bus infrastructure schemes are assessed.

Since the adoption of LTP4 in 2015 there have been significant changes in national policy that this plan has taken account of. A significant change has been the Department for Transport's (DfT) publication of 'Decarbonising Transport' policy. This made a commitment to 'drive decarbonisation and transport improvements at a local level by making quantifiable carbon reductions a fundamental part of local transport planning and funding'[2]. This commitment has been followed up by the release in 2024 of a Carbon Assessment Playbook, which is a tool designed to help local authorities estimate the impact that a variety of transport policies will have on reducing carbon emissions in their area. The Carbon Assessment Playbook has been used to understand the impact of the policies within this plan.

The process we undertook to write Our City Transport Plan 2035 is illustrated in

[2] DfT, 2021. Decarbonising Transport: A Better, Greener Britain



Figure 2. The starting point was to collate information into an evidence base and use this to identify what challenges the city faces. We then identified how we should respond to these challenges based on the vision we want to achieve.

In autumn 2021, we published a document called 'Developing a new Transport Plan for Brighton & Hove' and held a public consultation. We received over 900 responses, which were broadly positive of our proposals. A detailed report on the consultation is available on the council website[3]. After a pause in developing our transport policy, while we awaited publication of government guidance, a draft version of Our City Transport Plan 2035 was published in June 2025. This was aligned with the Council Plan 2023-2027 and other council policies such as the Accessible City Strategy 2023-2028. Public consultation on the draft version of this plan was carried out in the summer of 2025. Amendments have been made to this final document in response to the feedback received.



Figure 2: Process for developing Our City Transport Plan

Each annual capital programme is typically approved immediately before the beginning of the financial year. This is done once we know exactly what funding we will receive and can make firm plans on how to spend it. This document also includes proposed key performance indicators that we will use to monitor how we are reaching our objectives.

~~Our City Transport Plan covers the period 2025-2035. It is our over-arching transport policy document, which sets out both our long-term strategy and a short-term programme of work to deliver specific schemes. One of the key functions of Our City Transport Plan is to communicate to central government, who provide the majority of funding for local transport, what schemes need to be delivered in the city over the coming decade.~~

[3] Brighton & Hove City Council Environment, Transport & Sustainability Committee, 15 March 2022. Local Transport Plan: Engagement Outcomes

Accompanying this plan are other policies that set out greater detail for specific topic areas, such as our Bus Service Improvement Plan (BSIP). It is a legal requirement that we write this document, which in the relevant legislation, is referred to as a Local Transport Plan (LTP). Our City Transport Plan 2035 is our fifth LTP. The Transport Act 2000, amended by the Local Transport Act 2008, directs us to:

- develop policies for the promotion and encouragement of safe, integrated, efficient and economic transport to, from and within our area, and carry out our functions to implement those policies, and
- have regard to any guidance issued by the Secretary of State on preparing a Local Transport Plan.

Detailed requirements for an LTP are set out in guidance issued by the Secretary of State for Transport. LTP guidance was last published in 2009 and, although central government announced that new guidance would be published in autumn 2022, it has yet to do so. We do however have an insight into what updated guidance may contain from recently published national transport policies and other central government communications.

We have written Our City Transport Plan using these insights into what it is reasonable to assume will be included in the new guidance when it is eventually released. The most significant change we anticipate being included in updated guidance is the requirement to quantify our local carbon emissions.

The Department for Transport (DfT) published a policy on Decarbonising Transport in 2021 which made a commitment to 'drive decarbonisation and transport improvements at a local level by making quantifiable carbon reductions a fundamental part of local transport planning and funding. This commitment has been followed up by the release in 2024 of a Carbon Assessment Playbook, which is a tool designed to help local authorities estimate the impact that a variety of transport policies will have on reducing carbon emissions in their area. We have therefore written Our City Transport Plan 2035 using the Carbon Assessment Playbook in the expectation that any new guidance will include a requirement to assess what impact our policies will have on carbon emissions.

The starting point for writing Our City Transport Plan 2035 was for us to collate the available evidence about travel and transport in the city into an evidence base and use this to identify what challenges the city faces. We then identified how we should respond to these challenges by creating a vision for how we want our transport system to function in the future. At this point, in autumn 2021, we involved key stakeholders and the wider public to share the work we had undertaken by publishing a document called 'Developing a new Transport Plan for Brighton & Hove'. The public consultation on the proposed vision in this document involved an online survey, workshops with key stakeholders and sessions with groups that can otherwise be under-represented in order to ensure responses from a representative cross section of Brighton & Hove's population. We received over 900 responses, which were broadly positive of our proposals. A detailed report on the responses we received, along with amendments made to this initial work following the public input

~~is available on the council website.~~

~~This draft version of Our City Transport Plan 2035 contains further amendments made to align it with the Council Plan 2023-2027, which is the over-arching policy document for the council, setting out what we want to achieve up to 2027. While the horizon of this plan is 2027 the 4 identified outcomes will require sustained work beyond this to be fully achieved. We are now undertaking public consultation on this draft Our City Transport Plan 2035 document to shape the final version, which will then become council policy.~~

~~This document contains a greater level of detail than the previous 'Developing a new Transport Plan for Brighton & Hove' document. It provides greater context and in addition to the vision and objectives it looks at how our capital investment programme will change in the coming financial years. For the later years of this plan there are proposed schemes that we wish to deliver but which are not yet programmed to come forward. This is because our funding is chiefly from central government grants and the level of funding we will receive is not yet known. Because of this we have had to plan for different scenarios. The scenario planning has looked at what is possible under higher and lower levels of funding and what could happen if different policies are implemented at the national and regional level in pursuit of stated objectives.~~

~~Each annual capital programme is typically approved immediately before the beginning of the financial year by the council's executive decision-making body, the cabinet, which is made up of elected councillors. This is done once we know exactly what funding we will receive and can make firm plans on how to spend it. The schemes delivered by the capital programme are designed to achieve the objectives set out in this plan. This document also includes proposed key performance indicators that we will use to monitor how well we are doing in reaching our objectives.~~

~~The public consultation on this draft version of Our City Transport Plan 2035 focuses on gathering feedback on the more detailed measures, such as the proposed future schemes and how we will monitor our progress against our set objectives. Our public consultation will consist of an online survey, drop-in events providing an opportunity for residents to ask questions and share their views in person and sessions with key stakeholder groups. Key stakeholders include groups with a focus on transport users, economic growth, and those that could be under-represented without us making a conscious effort to include them such as disability groups and young peoples' voices. After the public consultation on this draft document, we will analyse all feedback and summarise it in a stakeholder engagement report, which will be considered by the council's cabinet when making a decision on adopting the final version of Our City Transport Plan 2035.~~

Review of work since our last transport plan

Our City Transport Plan 2035 supersedes Local Transport Plan 4 (LTP4), which was approved by the council in March 2015. Over the past 10 years, approximately

£148m has been allocated to deliver transport projects in the city. We receive grant funding from central government, typically ring-fenced for specific transport uses and this made up £107m of the total. The other £41m was allocated from the council's own funds.

Forty-eight per cent of the funding over the previous 10 years has been allocated to planned maintenance of existing assets: roads, pavements, paths, bridges, drains, signage and street lighting. Fifty-one per cent has been spent on schemes that created new assets or altered existing roads and pavements. One per cent was spent on revenue schemes where investment was made in people – receiving training or other assistance. Some of the main projects that have been delivered over this time are listed below:

Highway maintenance
This includes resurfacing roads and pavements, replacement of drainage and lighting infrastructure, upkeep of bridges and retaining walls, and the associated record keeping and surveys of all our assets. Nearly £32m has been spent keeping these in working order. There are around 20,000 streetlights in the city and over 18,000 have been switched to energy efficient light emitting diode (LED) lighting. This saves the council about £500,000 a year in lower energy costs.

Valley Gardens Phases 1&2
The green spaces of Valley Gardens used to be cut off from the North Laine area of the city centre, as they were surrounded by busy dual carriageways on both sides. The delivery of Valley Gardens Phases 1&2 has re-planted these green spaces and reconnected them with the city centre, making them spaces residents and visitors to the city centre can enjoy. By re-purposing the road on the western side of the gardens as a corridor for buses and taxis, space has been created for more direct active travel routes (particularly for walking & wheeling); improved and accessible gardens, public realm and event spaces. The third and final phase of Valley Gardens project is in progress, and this will deliver an excellent public space immediately in front of the Royal Pavilion, one of the city's main visitor attractions.

Western Road
This busy bus and active travel corridor has been transformed with improvements including a resurfaced road, resurfaced and tidier pavements, a simpler road layout with a central area to help with crossing for pedestrians; more cycle parking, seating and tree planting; and new bus shelters and street lighting. These major works have been funded from a range of sources, bringing together funding to ensure wide benefits to a range of users on this key route.

A259 seafront arches & Shelter Hall
The seafront arches support the A259 so they are classified as transport infrastructure. Ongoing maintenance work has taken place over the past 10 years along the length of the seafront, from the i360 in Hove, to Dukes Mound near the marina. We have taken the opportunity during the work to create attractive new spaces on the beachfront. This included the creation of Shelter Hall, a new seafront restaurant space.

Bus infrastructure

Since 2015 a mix of technological improvements and new bus lanes have delivered large benefits for both passengers and other road users. The Brighton & Hove Bus Ultra-Low Emission Zone covers well over 90% of buses operating in the city and has ensured that their engines meet the highest emissions standards for diesel vehicles. Smart traffic signals have been installed, which recognise when buses are approaching and adjust signal timings to give them priority. New Red Routes, recently created on the important bus corridors of Lewes Road and the A23, have prevented buses being delayed by inconsiderate parking, as well as keeping traffic moving and making these key routes safer for cyclists and pedestrians.

Electric Vehicle Chargepoints
LTP4 stated that there were 10 EV chargepoints in the city that the council had installed. There are now 525 chargepoint sockets that we have installed, which are a mix of low powered, fast and rapid chargers. There are 250 low powered chargepoint sockets, installed on lamp-columns in residential areas where households lack off-street parking and are designed for convenient recharging while cars are parked up. There are also 100 fast chargers around the city which provide a quicker charge or top-up. The council has provided 6 public rapid chargers, located where people will only be parked for a relatively short time, and 12 rapid chargers dedicated for taxi drivers. A minimum of 1,200 lamp column chargepoints, 350 fast chargepoints and 100 rapid chargepoints are planned to be installed across the city in the next 3 years.

Bikeshare
In September 2017 we launched the city's first public bike hire scheme with 50 hire stations and 500 bikes. In March 2023 this was refreshed with a new operator, additional hire stations and a new fleet including electric bikes. There are now 780 bikes for hire from over 100 hire stations. 60% of the bikes are now electric, so hilly areas are more accessible, and the scheme extends over a vast majority of the city. New sites to serve large housing developments will be sought to increase its reach. The scheme allows adjacent authorities to use our contract with the current provider to install hire stations and create one hire area across the greater Brighton area.

Active travel infrastructure
Our first Local Cycling and Walking Infrastructure Plan (LCWIP) was adopted in 2022 and shows the ambition of the city for improving active travel infrastructure, with 39 strategic network routes for improvement (including 17 priority routes), 32 local links for improvement, and 33 areas for area-based treatment improvements. Having the highly ambitious LCWIP in place allows us to showcase to central government the need for investment in active travel across the city.

Since 2015 we have added to the existing protected cycle network by delivering the Valley Gardens (Phases 1 and 2) scheme and upgraded facilities on the seafront roads of the A259 and Maderia Drive. This addresses one of the major barriers preventing people from accessing cycling; road safety concerns. Having somewhere safe to store a bike is another barrier and the council has installed 150 on-street residential cycle hangers, capable of storing 900 bikes securely, which residents can rent for the year at low cost.

Improvements to active travel infrastructure have also focused on connecting urban centers to the South Downs National Park. Woodingdean and Falmer are now

connected by a new 2.5km path. Woodingdean has also benefited from a new 1.5km path on Drove Road and path improvements in the Happy Valley area where 1.1km of new paths have been created. Stanmer Park is also accessible from Brighton via a new 2km path alongside Ditchling Road.

Road safety
Road safety measures can take the form of changes to particular road layouts, where there have been a high number of collisions, or area wide measures. Research shows that on urban roads with low average traffic speeds, any 1mph reduction in average speed can reduce the collision frequency by around 6%[4]. Most of the city's residential roads are now 20mph with phase 3 having been completed in the summer of 2015. Examples of more targeted safety measures includes our School Streets and Safer, Better Streets programmes. There are 15 schools in the city where School Street schemes have been delivered, and more are planned. The Safer, Better Streets programme[5] applies a set of principles and rules to assess and prioritise safety improvements, with an annual top ten locations identified where improvements are most urgently needed.

Training & behaviour change schemes
The council has funded a wide range of schemes to help keep people safe and allow them to access active travel and public transport. The three Bikeability levels teach the Highway Code and moves learners from learning balancing and riding skills off-road to mastering riding on quiet, and in due course, busier roads. We offer courses delivered in schools and in parks during school holidays to under 14s. Adult (14+) training takes place in parks and on roads. We also offer adult cycle maintenance basic and advanced training. We deliver child pedestrian training to Year 3 cohorts teaching them safe crossing skills.

Policy Context

[4] DfT, 17 March 2024. Setting local speed limits
[5] Brighton & Hove City Council. Safer, Better Streets programme

Our City Transport Plan 2035 must conform with relevant national, regional and local policies. National transport policies are created by the Department for Transport, ~~with regional policy the responsibility of Transport for the South East (TfSE). TfSE is one of eight relatively new regional transport bodies~~. Regional policy has been the responsibility of Transport for the South East (TfSE). TfSE has created policies that cover an area south of London from Kent in the east to Hampshire and Berkshire in the west. It was established in 2017, to determine what transport infrastructure is needed to boost the region's economy. Its board is made up of elected councillors from each local transport authority within its area and representatives from other national and regional partners including National Highways, Network Rail, South Downs National Park and Transport for London (TfL).



Figure 3: National and regional policies influencing Our City Transport Plan 2035

National
Integrated National Transport Strategy
Inclusive Transport Strategy
Decarbonising Transport
Future of Freight Plan
Gear Change: A bold vision for cycling and walking
Bus Back Better: National Bus Strategy
The Plan for Drivers
Cycling & Walking Investment Strategy
Connecting People: A Strategic vision for Rail
UK Electric Vechicle Infrastructure Strategy
Road Safety Statement
Future of Mobility: Urban Strategy
Strategic road network and the delivery
of sustainable development'
Regional
Transport for South East's:
• Transport Strategy
• Strategic Investment Plan

Figure 3 shows the key national and regional policy documents that have influenced the development of Our City Transport Plan 2035. Central government is currently developing an Integrated National Transport Strategy. A range of national transport policies that are either mode specific, such as rail or bus, or thematic, such as decarbonisation or accessibility and which applies to all modes, sit under the

Integrated National Transport Strategy. Central government funding streams are aligned with these policies and designed to deliver them. For example, the Cycling and Walking Investment Strategy and UK Electric Vehicle Infrastructure Strategy both have an accompanying funding stream; the Active Travel Fund (ATF) and Local Electric Vehicle Infrastructure (LEVI) fund. At the regional level TfSE has created a Transport Strategy and Strategic Investment Plan (SIP). Figure 4 shows schemes included in the SIP, which covers a period up to 2050, in the vicinity of Brighton & Hove.

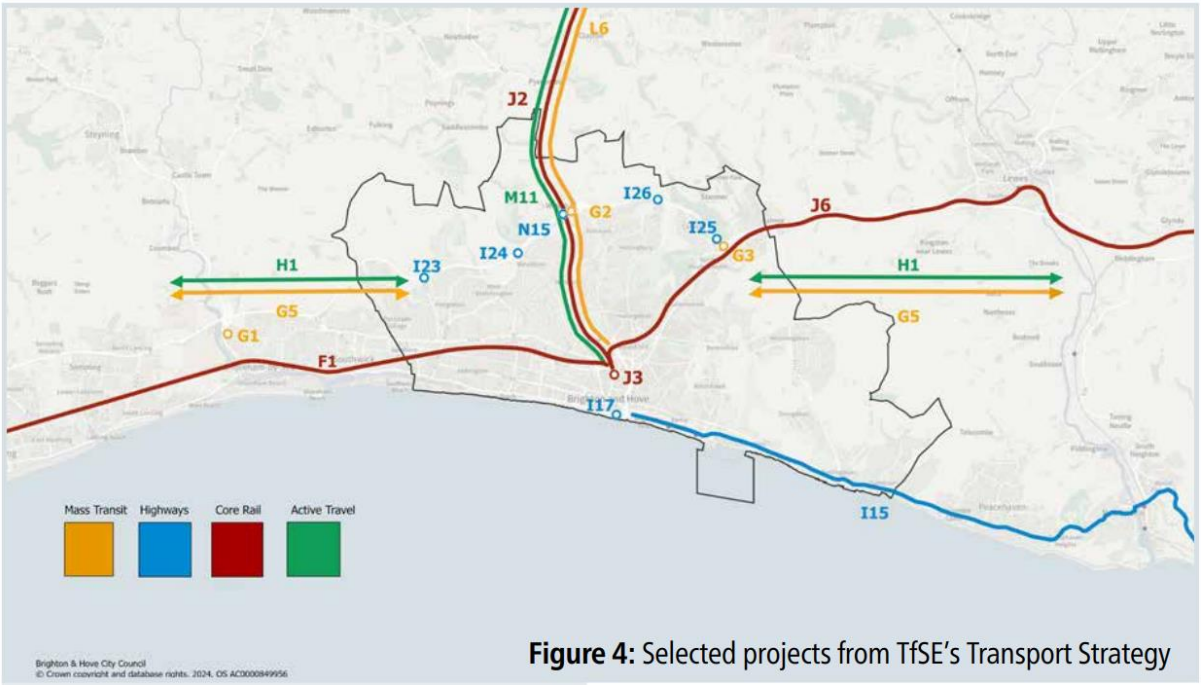


Figure 4: Selected projects from TfSE's Transport Strategy

KEY

F1	West Coastway Strategic Study
G1	Shoreham Strategic Mobility Hub
G2	A27/A23 Strategic Mobility Hub
G3	Falmer Strategic Mobility Hub
G5	Sussex Coast Mass Rapid Transit
H1	Sussex Coast Active Travel Enhancements
I15	A259 Highway Improvements
I17	A259 (Kings Road) Arches Renewal
I23	A27 Hangleton Junction Enhancements
I24	A27 Devils Dyke Junction Enhancements
I25	A27 Falmer Junction Enhancements
I26	A27 Hollingbury Junction Enhancements
J2	Brighton Main Line 100mph Operation
J3	Brighton Station Additional Platform
J6	East Coastway Line faster services
L6	A23 Corridor Rural Bus Enhancements
N15	A27/A23 Junction Enhancements
M11	Brighton/London National Cycle Network

Note that there are additional schemes not shown on this map that will also have a beneficial impact on Brighton & Hove. This is especially true for rail-based schemes, which are best planned at the regional level because routes cross over several local authorities and our ambitions for rail need to align. The most significant improvement on the Brighton Mainline would be delivered by the Croydon Area Remodelling Scheme, which would involve the rebuilding of East Croydon station with additional platforms. New bridges and fly-unders would separate rail lines that currently cross over one another. This is at the concept design stage but would improve reliability, capacity and the speed of some rail services on the Brighton Mainline.

Other transformative regional schemes that are proposed include Sussex Coast Mass Rapid Transit and strategic mobility hubs at Falmer, the A23/A27 junction and Shoreham-by-sea. A Sussex Coast Mass Rapid Transit would link up the cities and towns along the Sussex Coast. One inspiration for this scheme is the Belgium coastal tram that links ports, towns and seaside resorts along 60 kilometers of the coast. The Sussex scheme is not sufficiently developed to have decided what form it will take. Inspiration for a bus-based solution exists in Cambridgeshire where a dedicated busway connects Cambridge with commuter towns along the congested A14 corridor, where significant housing growth is planned.

Buses and active travel are the most efficient forms of transport and suitable for many short trips. The strategic mobility hubs on the edge of Brighton & Hove would have Park & Ride at their core and could also incorporate electric vehicle rapid recharging, and freight consolidation centers which have the potential to reduce the number of trucks within our city. The aim of these mobility hubs would be to enable easy interchanges between transport modes, encourage more efficient use of the road space and reduce congestion ~~improve the flow of traffic~~ within our city by providing a choice for visitors from outside to conveniently transfer onto public transport to access the city centre.

TfSE's funding is currently limited to developing business cases and feasibility work for the schemes within the SIP. However, ~~In the very near future there will be large changes to how local and regional governmental bodies are organised, as set out in the central government's white paper on Devolution. A~~ the new Mayoral Strategic Authority, ~~covering East Sussex, West Sussex and Brighton & Hove is anticipated to be in place by 2027. This is likely to~~ will have responsibility for strategic transport policy and may have greater scope to ~~control significant amounts of funding to~~ deliver the type of schemes set out in the SIP.



Figure 5: Our City Transport Plan 2035 and related policies

Figure 5 illustrates how Our City Transport Plan 2035 relates to other Brighton &

Hove City Council policies. It is subordinate to and supports the delivery of the overarching Council Plan 2023–27. The Council Plan identifies transport specific measures, under the Outcome ‘A City to be Proud of; an accessible, clean and sustainable city’. It commits the council to make it easier for people to move around the city and to:

- Have a clear plan to address the city’s transport needs and challenges
- Continue investing in maintaining and upgrading our highways network

It also has an important role to play in delivering the aspirations of other ~~whole~~ council-wide policies, such as the Accessible City Strategy, given that our roads and pavements make up such an important part of our public space. Transport is also crucial to the council policies on land use (which set out what can be built where), growing our economy and increasing our populations’ health and physical activity.

Sitting below Our City Transport Plan 2035 are several more detailed policies that cover areas such as improving conditions for walking, wheeling and cycling (Local Cycling and Walking Infrastructure Plan or LCWIP), or bus journeys (Bus Service Improvement Plan or BSIP). The Electric Vehicle Charging Plan is in development and following the adoption of Our City Transport Plan 2035 we will create a new Road Safety Action Plan that sets out targets for reducing casualties on our roads and what actions we will take to achieve this.

Key Council Policies influencing Our City Transport Plan 2035

Accessibility: The Accessible City Strategy establishes priority actions for each directorate within the council. Actions for the City Operations Directorate include improving city centre accessibility. Dedicated funding for improving accessibility is included in our capital works programme.

Economic development: A good transport network supports economic growth while traffic congestion adds to business costs. Our Economic Plan 2024-27 sets out 10 imperatives, one of which is the imperative to 'build a stronger, more inclusive labour market'. Our City Transport Plan objective to 'deliver a safe, inclusive and integrated transport system' supports this imperative.

Land use: City Plan 2041 is the overarching planning document for the city, setting out our policies for what can be built where. Subordinate to this are other planning policies. When we receive planning applications, approval is granted based on how well the application complies with our planning policies. There are close ties between land use and transport. Transport polices concerning new development are set out in the City Plan. Recent public consultation on City Plan 2041 shows strong levels of support for attractive streets and public spaces, supporting healthier lifestyles by reducing the impact of traffic, provision of local transport hubs, Park & Ride and delivery consolidation.

Health and physical activity: The Physical Activity Strategy 2024 – 2034 has five key areas of focus, one of which is to create Active Environments. Our City Transport Plan 2035 can help develop the city so that it is a place where people feel safe to travel actively as part of daily life. This key focus is reflected in the objectives to 'Provide active travel choices for all and excellent public spaces.' and 'create well-maintained streets and pavements'.

Carbon emissions: In the UK the transport sector is responsible for the largest volume of CO2 emissions. Our Carbon Neutral Programme collates actions that are being taken across different council departments. With transport CO2 emissions being critical to us achieving our ambitions to be a carbon neutral city, four objectives in Our City Transport Plan 2035 contribute to reducing them: enabling the uptake and use of zero and ultra-low emission vehicles, increasing public transport use, providing active travel choices for all and excellent public spaces and promoting and using technology to reduce and manage travel.

Air quality: The main source of pollutants causing poor air quality in Brighton & Hove are the petrol and diesel vehicles on our roads. Six Air Quality Management Areas (AQMA) have been declared in the city because levels of Nitrogen Dioxide (NO2) exceeded UK air quality standards. Vehicles are also a significant source of particulate matter (PM) air pollution. Our Air Quality Action Plan 2022-27 has influenced the creation of Our City Transport Plan 2035. The interventions supporting the objective 'enabling the uptake and use of zero and ultra-low emission transport' will have the biggest impact on improving air quality.

Challenges

Brighton & Hove is a relatively compact city, with a population of 277,100[6]. Housing affordability and housing quality are major issues that the city faces, as the supply of housing has not kept pace with the demand from people who wish to live here. Our population growth has been slower than the average for England and the southeast region. Delivering new housing and commercial space must largely be achieved within the existing urban area as expansion is tightly constrained by the South Downs National Park, which makes up 40% of the area that the council administers, and ~~also~~ by the sea ~~to the south~~. The city's two universities mean that students make up about 10% of the population.

The city acts as a regional hub for employment, transport, culture, leisure and shopping. Employment tends to be concentrated in the centre of Brighton and there are similar inflows and outflows of commuters of around 30,000 trips per day.

Figure 6 shows the main road and rail infrastructure which serves the city. The Brighton Mainline provides fast and frequent rail connections to Gatwick airport and London from several stations within the city. This rail line is also a cause of severance within the city with relatively few roads connecting east/west across it. The east and west Coastway rail lines provide links to smaller urban centers nearby; Lewes, Eastbourne, Worthing and Shoreham-by-sea.

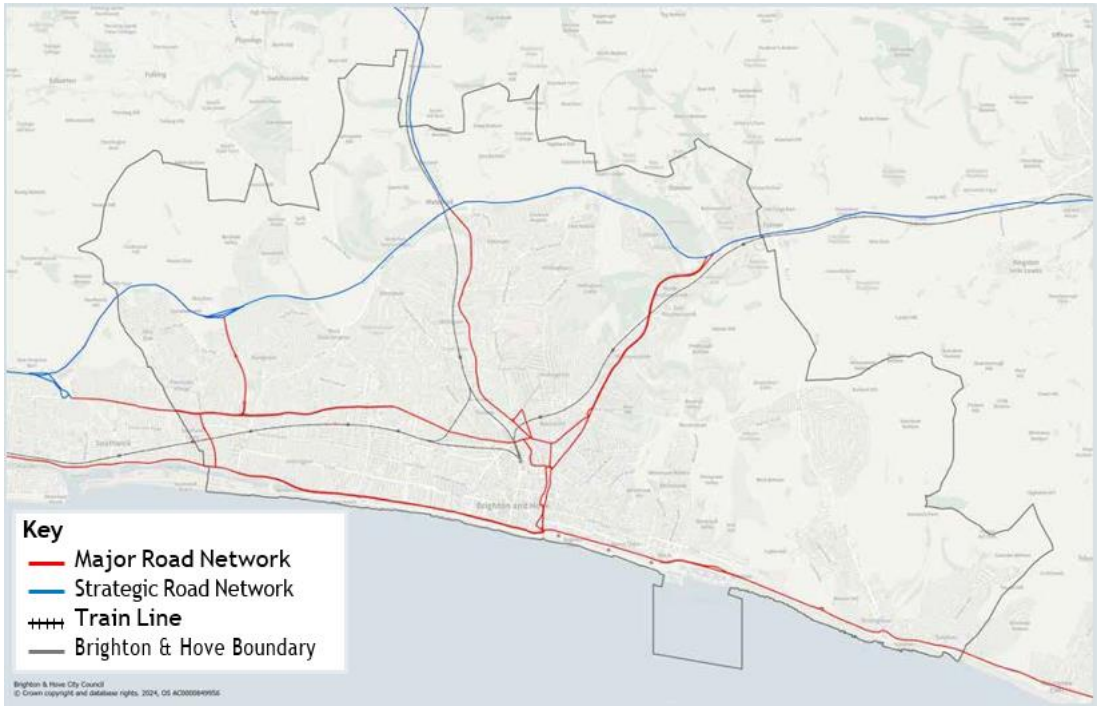


Figure 6: The strategic and major road network

The A27 skirts the northern edge of the city, acting as a bypass. The A23, running north/south through Sussex provides connections to Burgess Hill, Gatwick Airport and London. The main roads into the city from the north and northeast (London Road and Lewes Road) converge at the edge of the city centre and it is here that congestion is the most acute.

[6] Brighton & Hove City Council, 2021. Census results 2021

The transport challenges presented here are a summary of the findings of our analysis, which set out in greater detail in the accompanying evidence base document.

Challenge 1 - Enabling more people to live safer, healthier and more active lives

> **"If physical activity were a drug, we would refer to it as a miracle cure, due to the great many illnesses it can prevent and help treat".**
>
> UK Chief Medical Officers' Physical Activity Guidelines. 2019

Sedentary lifestyles contribute towards ill health. The NHS recommended that adults get at least 150 minutes of moderate intensity activity a week, or 75 minutes of vigorous activity, while children over six should try to do at least 60 minutes of moderate to vigorous intensity activity every day. Brighton & Hove is one of the better performing areas in the UK for physical activity, ranking 17th highest for physical activity amongst adults in England, but even so nearly 1 in 5 adults do less than 30 minutes of physical activity each week and fewer than half of children under 16 in the city meet recommended activity guidelines each day[7].

Brighton & Hove is a relatively compact city, with the city centre and other destinations within a short walk or cycle for many. Achieving recommended activity levels, and the subsequent health benefits, can come from simple changes to routines such as choosing to walk to school rather than take the car. There are a large number of short trips currently made by car which could be switched to active means. There is a large body of evidence that shows road safety fears are the main barrier preventing more people from taking up cycling[8]. Investment in better active travel infrastructure that provides high quality public realm and protected cycle lanes will open up the choice of cycling to many more people and not just those confident cycling in traffic. Better pavements in the city, that are free of obstruction, and attractive paths to access the national park on our doorstep will also make walking & wheeling an attractive option for short trips.

Schemes to provide protected facilities for cyclists on roads which carry a lot of traffic are currently ongoing on the A23 and A259. Phase 3 of the Valley Gardens scheme will deliver improved crossing facilities, higher quality public realm, protected cycle lanes and safer junctions. By creating streets and public spaces which enables and encourages active travel, by walking, wheeling or cycling, we create an environment where it is easier for everyone to incorporate physical activity into their daily routine. This will also assist with improving traffic flow, especially if car trips are removed from the network during peak travel times.

The delivery of better infrastructure and space for active travel could improve both the feeling of safety and reduce the number of collisions. While serious injuries or deaths caused by collisions on our roads are relatively rare, with 146 recorded in 2023, we believe this can and should be reduced further over the coming 10 years.

[7] Brighton & Hove City Council Physical Activity and Sport Strategy 2024 to 2034
[8] Cycling Embassy of Great Britain, 2020. Barriers to cycling

We commit to developing a Road Safety Action Plan that includes targets for reducing the number of people killed and seriously injured (KSI) on our roads. This is likely to focus on actions we can take to improve conditions for vulnerable road users; motorcyclists, cyclists and pedestrians. An initial assessment of KSI figures shows that in 2023 over half were pedestrians or cyclists. It is already the case that safety is the primary reason for some of the traffic schemes we undertake, and it is a consideration in all of them. Our continuous programme of Safer, Better Streets delivers smaller scale improvements in response to concerns raised by the public and collision data.

Challenge 2 – Reduce congestion on our roads

"A good transport network is not an end in itself, rather it is the means through which people and businesses live their lives and achieve their ambitions. The provision of a safe, reliable, resilient, responsive and efficient transport network can significantly expand the opportunities for success and encourage greater ambitions."

Road Investment Strategy 2:2020- 2025

There are an average of 108,000 daily trips originating within Brighton & Hove. While 73,000 of these trips begin and end in the city, 35,000 are to destinations outside of it. Approximately 30,000 trips are made into the city from the surrounding areas. The average delay on Brighton & Hove's local A roads is among the highest of any local authority outside of London. With 36% of emissions generated by private car trips of 5 miles or less[9] there is considerable scope to switch these journeys onto public transport, walking or cycling.

Figure 7 illustrates where congestion is most acute on the road network. It shows that delays are much greater on the local road network compared to the higher capacity strategic road network of the A23 and A27. Various junctions of the A27 can be affected by local traffic queuing to access Brighton & Hove. The local A road network is generally single lane and therefore has lower capacity. Delays tend to be worse closer to the city centre with the most severe delays of over 200 seconds per vehicle per mile occurring on:

- The A2023 between the seafront / Old Shoreham Road
- A2010 between the seafront and Seven Dials
- The A23, London Road, between St Peter's Church and Preston Circus.
- The A270, Upper Lewes Road and Viaduct Road, between Preston Circus and Vogue Gyratory

[9] WSP, City Science and Steer, 2024. Decarbonisation Baseline Report for Brighton and Hove

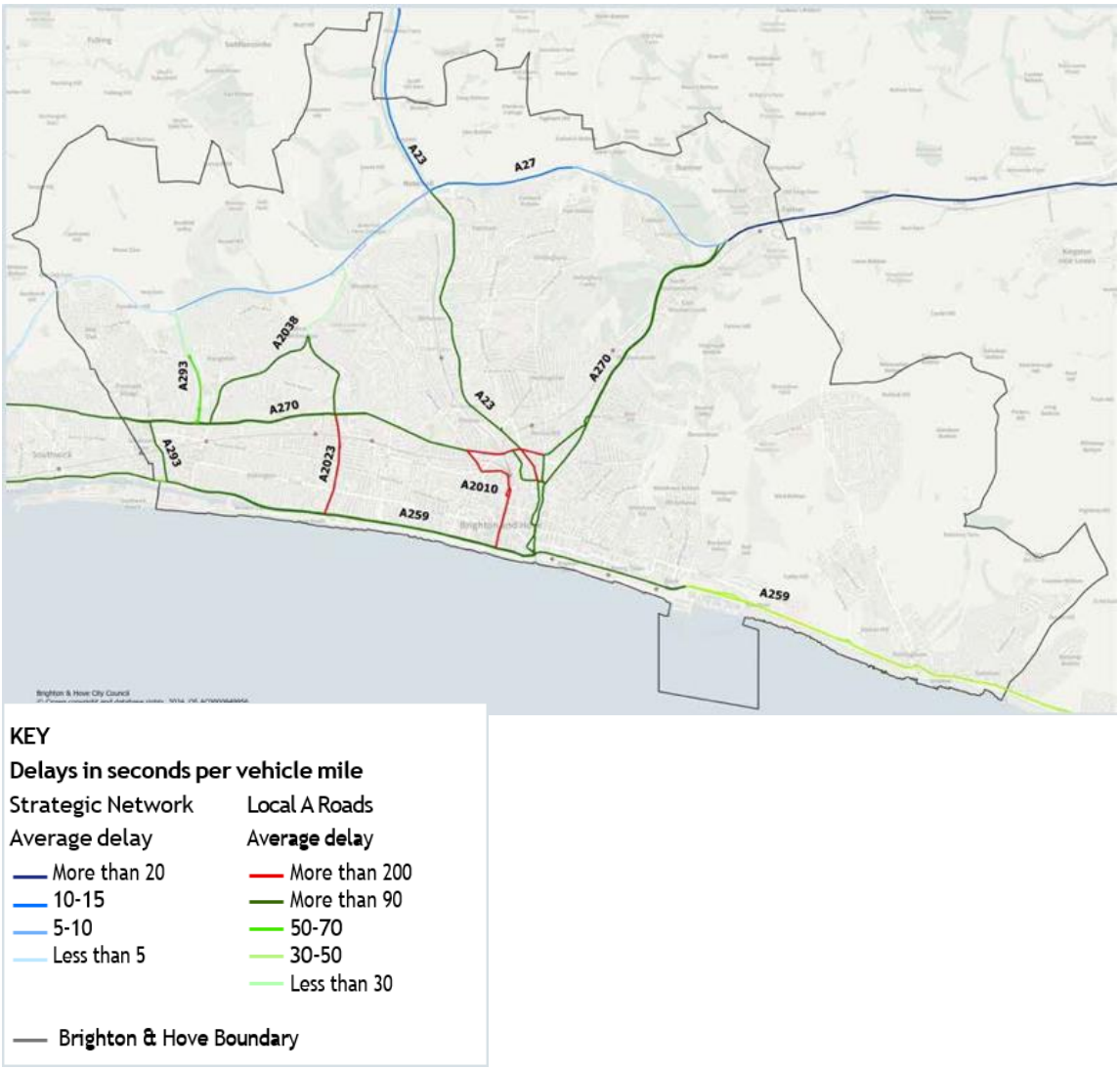


Figure 7: Average traffic delay on strategic roads in Brighton & Hove across 24 hours

In the built-up area of Brighton & Hove there is no available land for increasing road capacity without demolishing existing buildings. Even if it were possible to widen existing roads there is a sizeable body of evidence that increasing road capacity induces more traffic to use them rather than reduces delays. Instead, our approach is to increase how efficiently our existing road space is used. With buses and active travel being the most efficient modes of transport for moving people short distances in an urban area, the plan is to create additional bus and cycle lanes and to make these modes more convenient, faster and attractive relative to car travel.

Much of the data available to us focuses on weekday peak time congestion, when the road network is typically under the greatest stress. However, congestion also affects visitors to Brighton & Hove, particularly during the peak summer holiday season or when there are major events like Pride. With tourism being an important part of Brighton & Hove's economy, we want to ensure that getting here is hassle free for the estimated 11m visitors each year. Delivery of strategic mobility hubs at the edge of the city, which would have ~~include~~ Park & Ride at their core, would reduce the number of cars entering the city centre, where congestion is most acute, and improve journeys for all.

Key to managing congestion in the city lies in effective management of our road network, including through the Traffic Control Centre, this includes effective enforcement of Red Routes in the city to keep traffic moving along major routes serving the city. A challenge of this work is considering future technology and Artificial Intelligence (AI) solutions.

Challenge 3 - Supporting the transition to zero and ultra-low emission transport ~~vehicles~~

To reduce emissions from transport the preferred hierarchy of actions are to firstly eliminate the trip if it is not necessary, then switch to lower carbon modes, and if that is not possible, improve the emissions of private car trips. Because of the large number of trips that will still need to be made by private cars, switching away from petrol and diesel-powered vehicles is the single most important measure that will improve local air quality and reduce carbon emissions from transport.

~~For heavy vehicles there is still uncertainty about whether the switch will be to hydrogen or electric vehicles (EVs)~~ The transition to EVs for cars and vans ~~however, the switch to EVs~~ is already taking place, with battery EVs making up about a quarter of new sales. Central government has made it clear that local authorities have an important role in providing the necessary infrastructure for the UK to transition to electric cars and vans[10]. This is because EVs are commonly refuelled when parked.

Fifty-four per cent of households in Brighton & Hove have no access to off-street parking like a garage or driveway. If these households own a vehicle, then it will be parked on street. If the vehicle is an EV these households will largely be dependent on the publicly available charging network. As the manager of the roads and pavements in Brighton & Hove, the council has a key role to play in providing the necessary public chargepoints. Alongside Our City Transport Plan 2035, we are developing a dedicated Electric Vehicle Charging Plan setting out how we will address this challenge.

Because of the threat climate change poses, the UK Government, along with 195 other bodies, signed the Paris Agreement in 2015. This has the goal of holding the increase in global average temperature to well below 2°C above pre-industrial levels and avoiding the significantly more severe impacts arising from climate change.

> **"The fact is that no species has ever had such wholesale control over everything on Earth, living or dead, as we now have. That lays upon us, whether we like it or not, an awesome responsibility. In our hands now lies not only our own future, but that of all other living creatures with whom we share the Earth."**
>
> David Attenborough

The UK Government has committed to achieving Net Zero carbon emissions by 2050. This means that emissions will be reduced to as close to zero as possible with any remaining emissions offset by mitigating action. To assist with meeting these commitments the Committee on Climate Change (CCC) was established by the

[10] DfT and Office for Zero Emission Vehicles, 30 March 2023. Electric vehicle charging infrastructure: help for local authorities.

Climate Change Act 2008. This expert, independent body advises the UK and devolved governments on emissions targets and reports to Parliament on progress made in reducing greenhouse gas (GHG) emissions. It is the leading authority on how the UK can achieve Net Zero by 2050 and has published a large amount of research and guidance including the role ~~of~~ local authorities have to play and what transport specific actions we need to take.

Surface transport (which excludes flights) is responsible for 22% of the UK's GHG emissions[11], with the overwhelming majority of these from road transport. In Brighton & Hove transport is responsible for a third of the city's carbon emissions so is the key sector where action is needed. The action that will have the greatest impact on reducing our transport GHG emissions is switching vehicles to EVs as early as possible. This will also improve air quality in the city, as exhaust pipe emissions of Nitrogen Dioxide and particulate matter will be eliminated. Air pollution is covered in detail already in other policies[12].

GHG emissions explained

GHG refers to seven emissions that have a heating effect on the earth's atmosphere. The most prevalent are carbon dioxide and methane. GHG emissions from vehicles is overwhelmingly made up of carbon dioxide and the terms are used interchangeably in this document.



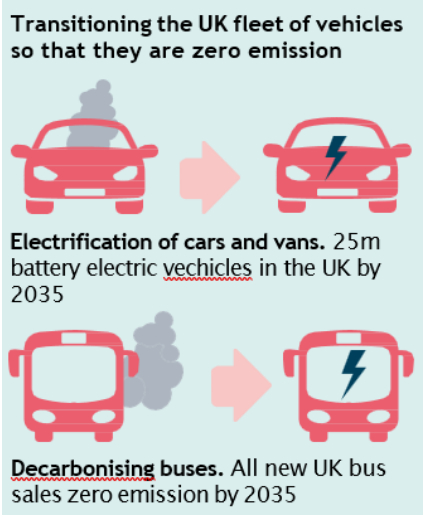
Figure 8: Brighton & Hove emissions by sector. Source - Decarbonisation Pathway Study

[11] CCC, December 2020. The Sixth Carbon Budget Surface Transport.

[12] Brighton & Hove City Council, October 2022. Air Quality Action Plan 2022 to 2027.

The CCC has produced a preferred 'Balanced Pathway' of how Net Zero is reached and published carbon budgets that cover 5-year periods. It is clear from this that the journey of how we get to Net Zero by 2050 is of vital importance. The most recent 6th Carbon Budget was published in December 2020. Under the CCC Balanced Pathway there are 3 key actions for road transport:

- Reducing travel demand and shifting journeys onto lower carbon modes
- Transitioning the UK fleet of vehicles so that they are zero emission.
- Making fossil fuel-powered vehicles more fuel efficient.



There were 38.7m cars and vans registered in the UK at the end of June 2024[13]. By 2035 25m, or 60% of the current fleet needs to be fully battery electric (not including hybrid vehicles). In Brighton & Hove there are currently 2,392 battery electric vehicles registered[13] as shown in Figure 9. This is out of a total of 111,700 vehicles registered in the city, meaning that 2.1% of the fleet is battery electric. Adoption of EVs varies considerably by region with more affluent areas adopting EVs much earlier. In 2023 16% of new car sales were EVs in the Brighton & Hove area, which is around the UK average; whereas in more affluent areas such as south-west London and Oxfordshire nearly 50% of new car sales were EVs.

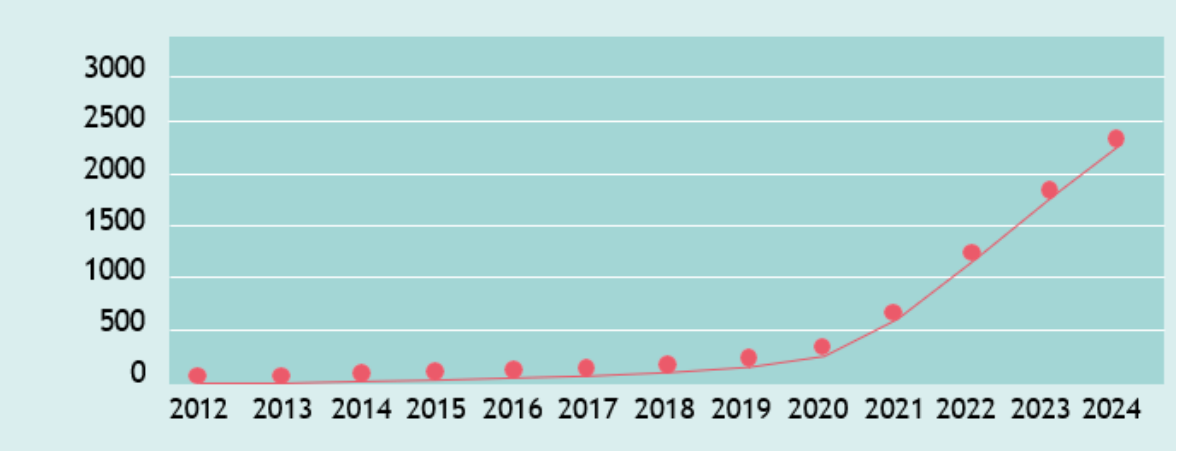


Figure 9: Licensed Battery Electric Vehicles (BEVs) in Brighton & Hove (June 2013 to June 2024)

The council's draft Electric Vehicle Charging Plan estimates that by 2035 there could be 64,000 EVs registered in Brighton & Hove. Depending on the type of chargers installed, the city may need up to 6,900 chargepoint sockets to cater for this demand.

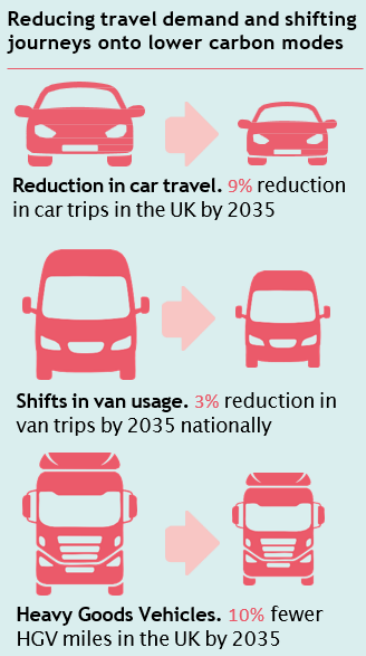
While electrification is established as the most likely way that cars and vans will decarbonise, there is uncertainty over the best way to decarbonise heavier vehicles. Both electric and hydrogen power are possible solutions. By 2035 about 33% of the UK's heavy goods vehicles (HGVs) and coach fleet (about 170,000) need to be zero emission and 67% by 2040[11].

Depots will need refuelling facilities, supplemented by refuelling points likely to be on

[13] DfT and Driver and DVLA, 24 September 2024. Vehicle licensing statistics data tables.

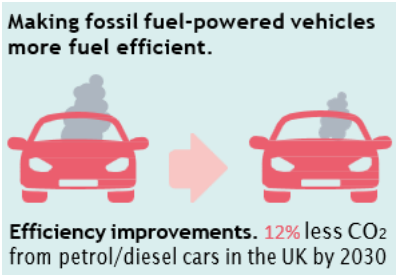
the main trunk network. As we are not responsible for trunk roads the council's main role will be in decarbonising our own heavy vehicle fleet, such as refuse collection vehicles and facilitating infrastructure at sites such as Shoreham Port and bus depots. There are now 72 electric vehicles in operation across the council[14]. The CCC states that all new bus sales will need to be zero emission by 2035. The council will have a role to play in decarbonising the local bus fleet. We will work with operators to provide any necessary on-street infrastructure, power cables and provide the regulatory framework for what kind of buses can operate on our roads.

Rapid electrification of the UK's car fleet will not be enough by itself to achieve Net Zero. Nationally a 9% reduction in car trips is needed. This will be delivered by fewer journeys being made (from greater homeworking for example) and car trips being shifted to modes such as active travel or public transport. Towns and cities are far better able to deliver modal shifts than rural areas because there is better public transport provision. Figures from the National Traffic Survey (NTS) show that around 71% of all trips are under 5 miles and two thirds of these are made by car or van[15], meaning there are a large number of trips which potentially can be shifted.



Internet shopping and home delivery services have, in part, been responsible for van usage increasing from 10% to 16% between 1994 to 2019[16]. In addition to electrifying the van fleet a 3% reduction in van use by 2035 is needed. HGV miles also need to be reduced by 10%. To deliver this, measures such as consolidation centers and last mile delivery to urban centers being undertaken by portering or e-Cargo bike can be effective. There is a lack of detailed local data on van and HGV usage trends in Brighton & Hove. This will be an area of future study to assess exactly what measures will be taken and to what extent the fleet can be decarbonised.

Under the CCC Balanced Pathway to Net Zero, new petrol and diesel vehicles need to improve fuel efficiency by 12% by 2030. This is not just about technological improvements to engines; it also includes trends in vehicle purchases. The popularity of larger heavier vehicles, such as SUVs, means that fuel efficiency has been getting worse. While manufacturers will largely be responsible for delivering this change, we can also incentivise the uptake of more fuel-efficient vehicles through emissions-based pricing for parking costs. The introduction of any emissions-based scheme will factor in, and mitigate, the impact on those on low incomes, with disabilities and other marginalised groups.



[14] Brighton & Hove City Council, 28 May 2024. Plugged in depot a first for zero emission fleet.
[15] DfT, 14 December 2023. National Travel Survey:2022
[16] DfT, 15 April 2021. Final Van Statistics April 2019 - March 2020

Challenge 4 - Creating a transport network that is more inclusive

> **"As a disabled person I have to think and plan far more than anyone else. If I want to catch a bus I have to consider whether the ramp works, whether there will be someone in the one space who doesn't want to move. It can be a constant worry."**
>
> Tanni Grey-Thompson

Our transport network reflects wider inequalities in our society, and it is a challenge to re-balance this to be more inclusive. We are committed to meeting our equalities duties towards groups with protected characteristics, under the 2010 Equalities Act, and to go beyond this to ensure that the less well-off are not unfairly excluded too. There are some stark differences in transport usage related to income.

Analysis undertaken by Transport for the North has assessed the risk of transport-related social exclusion[17]. This is defined as areas where households without access to a car face disadvantages in accessing essential services such as employment, education, health and banking. People in these areas may also be committed to owning a car, which is a stretch on their personal finances, but see it as the only viable way they can access these services.

During the public consultation the specific issue of transport-related social exclusion regarding access to secondary education was raised with the council. The distribution of schools across the city is uneven and in the east that results in some areas being within a single school catchment area. The council recently changed schools' admissions criteria to facilitate greater choice for those in single school catchments, and this was supported with a re-organisation of the city's bus services to make accessing schools easier. Cost of public transport remains an issue.

The main areas in Brighton & Hove where people are at risk are highlighted in red and dark red in Figure 10. This includes Woodingdean, Bevendean, Mile Oak, Hangleton, Coldean and Hollingbury. Building on this analysis the council have commissioned an analysis of bus services to understand how we can improve those areas at risk of social exclusion.

[17] Transport for the North, 22 September 2022. Risk of transport-related social exclusion

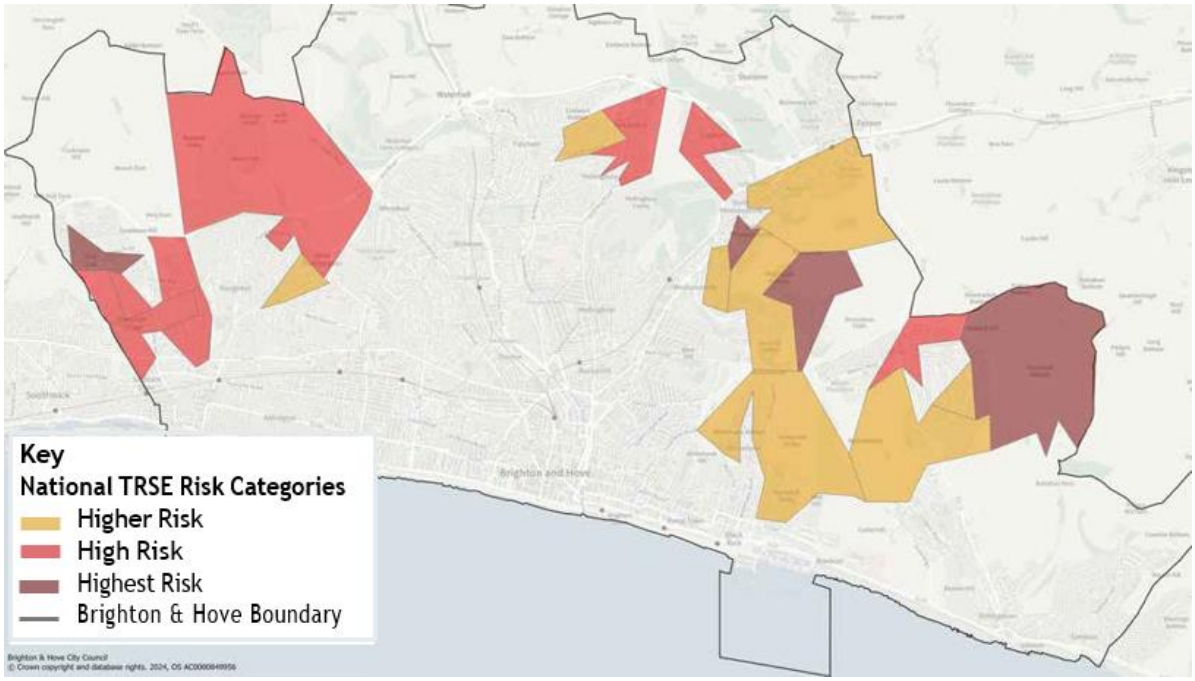


Figure 10: National transport related social exclusion risk categories map – Brighton & Hove

There are also marked differences in people's travel habits according to how wealthy they are. The UK has a very high level of income inequality compared to other developed countries. In 2022 20% of households with the lowest incomes had an equivalised disposable income of £13,218, while the 20% of households with the highest incomes had an equivalised disposable income of £83,687[18].

More affluent households make more trips than less well-off ones and there are large variations in the modes of transport used across different household income bands. The 20% of households in the lowest income bracket shown in Figure 11 typically make the most trips on foot and are the only income group that make more walking trips than car trips. For all other households walking is the second most frequent mode of transport after car[19].

Figure 12 illustrates that the more disposable income a household has the more car trips they make. The 20% of households in the highest income bracket make double the number of car trips than households in the lowest income bracket. The difference is even starker when looking at the distance travelled by household income. Both before and after the Covid pandemic (2019 & 2022), the most affluent households travelled three times further by car than the least affluent households.

[18] Equality Trust, 2022. The scale of economic inequality in the UK

[19] DfT, 28 August 2024. Travel by vehicle availability, income, ethnic group, household type, mobility status and NS-SEC. https://www.gov.uk/government/statistical-data-sets/nts07-car-ownership-and-access.

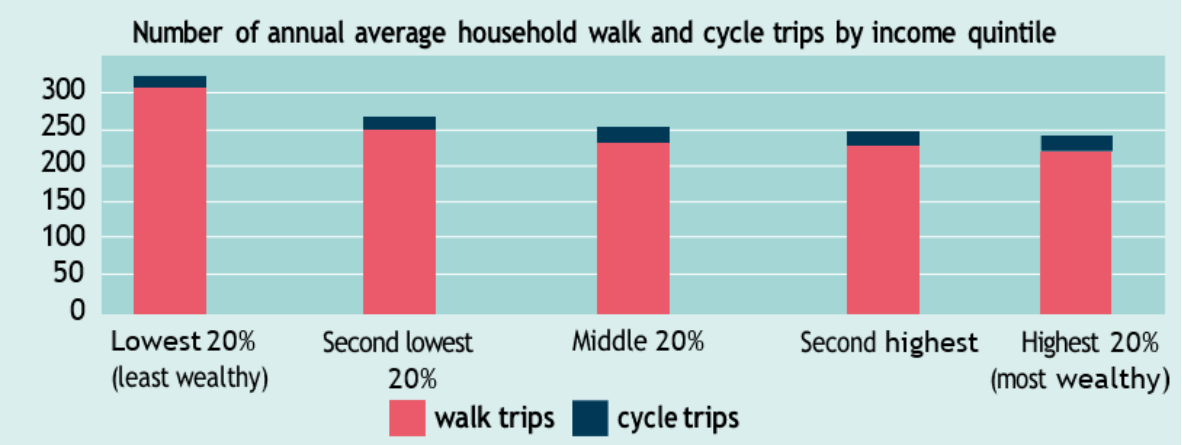


Figure 11: National household walking and cycling trips by income (National Transport Survey)

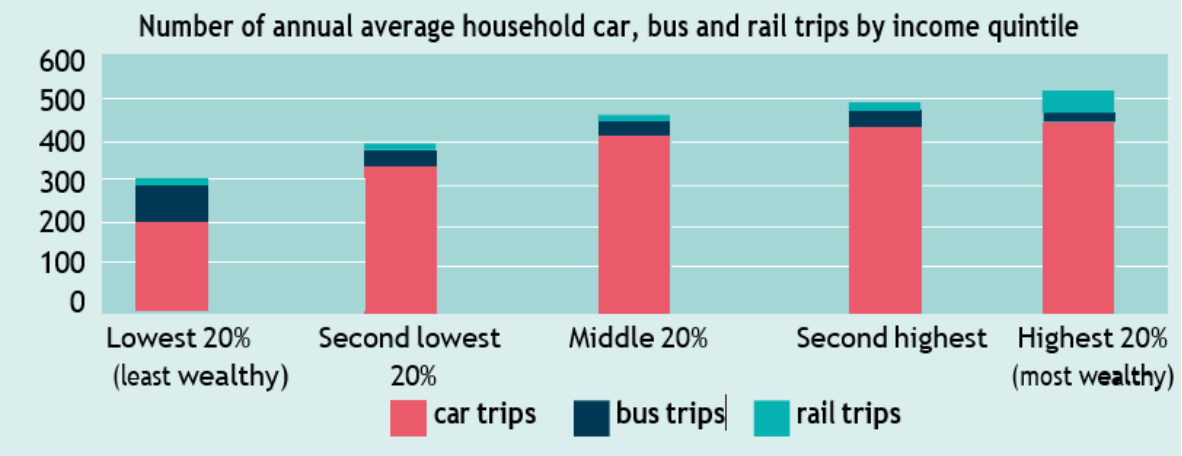


Figure 12: National household trips by mode and income (National Transport Survey)

Public transport accounts for far fewer trips per household, although this average will mask how important rail and bus services are for some households. Rail use is dominated by more affluent households with 41% of trips made by those in the most affluent 20% of households and just 11% made by those in the lowest 20%. The reverse is true of bus journeys with 33% of local bus journeys outside London made by people in the lowest income band compared with 9% by people in the highest income band.

Post-pandemic the number of cycling trips made annually is roughly equivalent to the number of trips made by rail, although rail travel may recover to pre-pandemic levels in time. Walking and cycling are the modes with the least pronounced variation by household income. While bus skews heavily to use by less well-off households and car and train to use by the most well-off households the lowest income households account for 16% of all cycling trips and 25% of all walking trips, while the highest income households account for 25% of cycling trips and 17% of walking trips. A transport network that prioritises walking and bus users is one that helps to make it more inclusive for all.

There is also a challenge to ensure that the transport network is inclusive for those with disabilities. Disabled people undertake far fewer trips than those without disabilities. Results from the 2024 National Highways & Transportation survey, which allows us to benchmark our performance against other local authorities, shows that disabled people scored access to services in Brighton & Hove in line with the

national average. However, at 62%, this is a full 11% points lower than the score given by disabled people in Brighton & Hove, who scored ease of access to services at 73%. The same trend is true regarding the ease of use of pavements and footpaths by disabled people. The score for Brighton & Hove is in line with the national average, but at 41% this is a low overall score.

During public consultation on this policy, we received feedback about specific issues. Some disabled people, who are reliant on cars for transport, felt that pavement widening in The Lanes made it harder to access the city centre because it reduced places that Blue Badge holders could park. Similar concerns were raised about Red Routes, although Blue Badge holders can be picked up or dropped off, so long as the vehicle is not parked. There were also concerns raised about cycle infrastructure, street clutter and the quality of our streets.

To address these concerns we commit to update our streetscape design guidelines which set the standards for the materials, street furniture and layout of our roads and pavements. The guidelines will be developed in close consultation with groups representing disabled people. The aim will be to improve the quality and consistency of street works and address specific accessibility concerns.

In addition to this we will dedicate funding to a rolling programme of accessibility improvements, that deliver simple improvements such as dropped kerbs at each road crossing point. This will make a big difference to people's lived experience when travelling around the city. We will also work with transport providers, such as bus companies, to identify what improvements are of most importance to disabled users. Through our BSIP programme we recently held focus groups with a range of bus users including LGBTQ, neurodiversity groups, Special Educational Needs & Disabilities (SEND) organisations, ethnic minorities, refugees, mental health community organisations. The council also uses its powers as a taxi licencing authority to implement policies that support the use of wheelchair accessible vehicles. Statistics from the Department for Transport for 2024 show that the percentage of wheelchair accessible vehicles in taxi fleets in England, excluding London, is 15.6% whereas in Brighton & Hove the figure is 45%. In private hire fleets the national figure is 5.2%, compared to Brighton & Hove's 19%[20]. We also regularly keep under review the provision of dedicated disabled bays in the city as well as responding to requests received.

Challenge 5 - Maintaining our roads and managing them as efficiently as possible

> **"An ounce of prevention is worth a pound of cure."**
>
> Benjamin Franklin

We know that the conditions of the pavements and roads in the city have been worsening. We regularly survey their condition and in 2023 commissioned a condition projection model to help make the case for greater investment. This model estimates the total value of our roads and pavements and how much annual

[20] DfT, 22 January 2025. Taxi and private hire vehicle statistics, England:2024(revised)

maintenance is required to keep the assets in good condition. It found that in Brighton & Hove, the value of the carriageway infrastructure is currently reducing by £6.9 million per year. In the financial year 2023/24 the allocation from Government for highway maintenance was approximately £2.9 million[21], which is 42% of the yearly wear and tear cost and only 0.3% of the total asset worth. This amount is insufficient to maintain them in good condition and is of high importance to the public[22].

While maintenance work is a challenge we use a data and technology-led approach to optimise how we spend the funds we receive to use it as efficiently as possible, and will look to more efficient ways of doing this in future with new technologies. The highway asset management plan guides where in the city will receive investment so that sections of road or pavement that is close to failing is maintained before this occurs. Reactive maintenance also takes place to deal with sections of road and pavement where potholes or other critical failures have to be addressed.

Pavement parking is a major issue in the city and we have campaigned to convince central government for a number of years to simplify how we ~~have the powers locally to be able to~~ enforce pavement parking. Currently, pavement parking enforcement is only possible where a defined scheme is in place. The council is seeking powers from central government which would mean that the default is for pavement parking to be banned, unless signage shows otherwise. This would make it easier for the council to keep pavements clear of obstructions and not be subjected to additional wear and tear from vehicle damage. Managing our fixed road space efficiently is an ongoing challenge and the council has a permit scheme in place to effectively manage the cities roads, the council intend to implement a Lane Rental scheme to manage the busiest sections of the road network when necessary works are taking place, with charges for the occupation of the carriageway and penalties for over-running works which impact on traffic flow and bus timings.

The good news is that there has been an increase in the dedicated funding we receive from central government for maintaining our roads and pavements in the most recent financial year. In 2025/26 central government awarded us £5.3m which is an increase of nearly 83% on the funding we received in 2023/24. We will continue to make a clear evidence-based approach for greater funding to deal with the backlog of maintenance work that needs to be tackled.

Vision, Objectives & our Capital Programme of work

Our vision for Our City Transport Plan 2035 is **getting around a cleaner, fairer, and growing city**. Having identified the main challenges the city faces we have set out six objectives that respond to them.

[21] BHCC Condition Projection Model Results. Oct 2023. Xais Asset Management

[22] NHT, 2024. 2024 NHT Public Satisfaction Survey Report - Brighton & Hove City Council - 92% said road condition was important to them, but only 22% said that they were satisfied with the condition of roads

Objective 1: Increase public transport use.



Objective 2: Enable the uptake and use of zero and ultra-low emission transport.



Objective 3: Deliver a safe, inclusive and integrated transport system.



Objective 4: Create well-maintained streets, pavements and rights of way.



Objective 5: Provide active travel choices for all and excellent public spaces.



Objective 6: Promote and use technology to reduce and manage travel.



Achieving these objectives will help to address one or more of the challenges that the city faces. For example, to address the challenge of reducing congestion there is no single solution. Instead, there are multiple actions we can take that will have a cumulative impact on reducing congestion; greater use of public transport, switching more journeys to active travel, increased home-working and re-timing of journeys outside of peak times.

Objective 1: Increase public transport use

The initiatives in this section focus primarily on buses, as the council has far greater scope to influence bus services within the city, than it has rail services.

Spotlight on Rail

The Brighton mainline is hugely important for residents who commute to central London by rail. It is the most popular destination from Brighton & Hove. Prior to the Covid pandemic overcrowding at peak times was a major issue but reduced passenger numbers in the peak post pandemic mean this has eased. Reliability and resilience of these services remains an issue. Trains travelling along the coastway, east and west of Brighton, must terminate at Brighton station because of the capacity constraints. A new platform at Brighton station would be needed to resolve this. Through-trains and faster, better timetabled services on the Coastway would strengthen economic links with neighbouring towns.

Rail infrastructure improvements are decided on by the DfT and the council has relatively little influence over what rail services are provided at the 8 stations in the city. For our voice to be heard we must work with other local authorities, and the new Mayoral Strategic Authority, to agree joint priorities. Short term priorities for rail are: ~~As a member of TfSE we work with other local authorities across the South East to lobby for improvements to benefit the wider region. In the short term the priorities are for:~~

- optimising fares, ticketing, and on-board amenities.
- refining timetables to support fast- growing markets like leisure travel and rescheduling maintenance to reduce disruption.

Longer term priorities are:

- improving resilience, reliability and capacity on the Brighton Mainline to London by removing bottlenecks and delivery of the Croydon Area Remodelling Scheme.
- upgrading the railway on the Brighton – Southampton coastal corridor to strengthen economic ties
- upgrading the eastern Coastway to improve line speeds and reliability.
- exploring Mass Rapid Transit (not necessarily rail) – express public transport services along the coastal corridor

Bus usage in Brighton & Hove is the highest anywhere in the UK outside of London, with 147 bus trips per person in 2023/24. There is still significant room for growth, as before the pandemic bus use was around 174 trips per person. Some studies suggest that remote working has significantly reduced the frequency of commuting trips[23] and this may be one of the reasons for the decline in bus trips per person in Brighton & Hove. In 2021 we created our first Bus Service Improvement Plan (BSIP) and were awarded £27.9 million by central government to improve bus services in the city and help ridership recover following the pandemic. At the same time, we

[23] DfT, 31 October 2024. Transport behaviours, traffic forecasting and long-term impacts of COVID-19

entered into an enhanced partnership with bus operators in the city to ensure closer working arrangements with clear targets, roles and responsibilities.

The BSIP funding is used to deliver a mix of physical infrastructure like bus lanes or Red Routes and subsidies to lower fares or provide bus services to areas where it is not commercially viable. Fare offers funded by BSIP include free travel for accompanied children and 50p off-peak travel for unaccompanied under 19s. Much of the new bus lane infrastructure has only recently, or is still in the process, of being delivered so it has not yet had an impact on journey times. Between 2019 and 2023 there was a 1.2% increase in journey times, based on monitoring of 20 unchanged routes operated by Brighton & Hove Bus & Coach company. Our aim is to reduce journey times by 5%, from the 2018/19 baseline, by 2024/25.

The new express 1x service, supported by BSIP funding, and operating on one of the heavily used routes in the city, saw journey time improvements of 28% over comparable services on the same route. A second express service, the 3x, launched in August 2025 and links the city centre with Falmer, Hove and Hangleton. The BSIP has been refreshed for 2025 and sets out what actions we will take up to 2030. Our understanding of what bus users want, and what we will therefore seek to deliver is:

- clearer and simpler tickets
- faster and more reliable journeys
- lower fares
- more frequent services to underserved parts of the city and the South Downs

Fuller detail on specific measures can be found in the BSIP document, but the actions include:

- investigating the feasibility of strategic mobility hubs to deliver Park & Ride on the edge of the city
- better bus shelters, accessibility improvements, new real time bus information and maps to assist with onward travel at bus stops
- applying equality and accessibility standards across all buses
- delivering more bus priority infrastructure including Red Routes, bus lanes and priority at signalised junctions
- discounted travel for young people
- making it easier to get the cheapest ticket
- better integration between bus operators, rail and cycle (including Bikeshare)
- more frequently supported bus services
- more express services

Spotlight on Park & Ride

Park & Ride would form a core part of any strategic mobility hub on the edge of the city. Anyone using their car to access the city could park on the edge of the city and continue their journey using a bus. TfSE have identified that strategic mobility hubs, which would include Park & Ride, are required at Falmer, Shoreham-by-sea and the A23/ A27 junction. Bus Service Improvement Plan (BSIP) funding is being used to help make the business case for Park & Ride and the creation of a purpose-built facility.

While this work is on-going the council is looking to see how existing car parks outside the city centre, that have spare capacity, can be used ~~alongside existing bus services~~ to provide some Park & Ride capacity to ~~improve traffic flow~~ reduce congestion in the short term. Recent public consultation on City Plan 2041 indicated strong levels of support for both strategic Park & Ride and local mobility hubs.

In summer 2025, the council ran a Park & Ride service at the University of Sussex campus on selected weekend dates. The aim was not only to support travel into the city during the busy summer period but also to gather feedback from users and the public to inform the development of a permanent Park & Ride facility. Learnings from the summer Park & Ride Satisfaction levels were high with users, and of those surveyed 81% would have driven a car or van into the city if the Park & Ride had not been available. We will continue to work with car park owners to both investigate the feasibility of a permanent Park & Ride scheme and provide affordable and sustainable Park & Ride facilities in the interim.

Objective 2: Enable the uptake and use of zero and ultra-low emission transport.

For car owners looking to understand how the council will assist them to switch to an EV, the council's draft Electric Vehicle Charging Plan, which is in development, will set out how the planned new charging infrastructure will be rolled out across the city.

- We will install a minimum of 1,650 public EV chargepoint sockets by March 2028 using the Local Electric Vehicle Infrastructure (LEVI) funding we have secured. We aim to install many more chargepoints than this by using our grant funding to attract additional private sector investment.

We will focus delivery on areas where households lack access to off street parking and ensure that distribution across these areas is equitable, with the aim of reducing the distance people have to walk to find their nearest chargepoint. In areas with Controlled Parking Zones (CPZs) the cost of parking permits is already based on emissions. We regularly review our pricing structure and will continue to use incentivising zero and ultra-low emission vehicles as a guiding principle of our pricing.

Spotlight on Parking Policy

The issue of how households without off-street parking recharge an EV illustrates how important our parking policy is in influencing people's transport choices and assisting in delivering the objectives of this plan. The availability of parking also affects people's transport choices. The city's 27 controlled parking zones (CPZs) are in place to manage parking demand on behalf of residents. Parking permits in CPZs are priced according to emissions, to encourage the uptake of ultra-low and zero-emission vehicles and support air quality objectives. The cost of using kerbside space for parking also varies depending on location and how accessible an area is by public transport. These considerations are balanced against the need to have a pricing structure that is simple and easy to understand.

The Council also manages off-street car parks. The pricing of our off-street car parks is designed to offer users choices of where to park, with those on the edge of the city centre offering lower prices to reduce city centre congestion. The parking team also manage the Blue Badge and concessionary travel schemes, which issues free bus passes to those over 66 and qualifying disabled people. Concessionary passes are funded from parking revenue surplus. Greater detail of our parking policy can be found in our Parking Annual Reports.

It is a priority for us to give additional assistance to taxi and private hire drivers looking to switch to EVs because these high mileage drivers have an outsize impact on local air quality and carbon emissions. We will provide additional dedicated taxi-only chargers and explore what opportunities devolution and local government reorganisation offers to work collaboratively with other taxi licensing authorities to harmonise environmental standards. We want to ensure that locally licensed taxis are not at a disadvantage if higher environmental standards are required.

Environmental standards for taxis and private hire vehicles can be set as part of the license. This would be an effective tool to speed up the adoption of zero emission vehicles, but taxis and private hire vehicles licensed elsewhere are able to ply for trade in Brighton & Hove. If they are not subject to the same environmental standards, locally licensed taxis will be at a disadvantage and we want a level playing field.

The council sets the terms of operation for car clubs in the city, which provide flexible and conveniently located hourly car hire across the city. Some of the new chargepoints we install will serve car club bays. Once in place we will require operators to ensure that half of their fleet is EV by 2028. Like taxis, car club vehicles are high mileage vehicles, seeing more intensive usage than the average privately owned car so switching these fleets to be zero emission has a greater impact on air quality and carbon emissions.

The Brighton & Hove Bus Ultra-Low Emission Zone (ULEZ), which is in operation on Western Road and North Street, has been responsible for improving bus emissions by ensuring that all buses travelling through the ULEZ meet the highest Euro VI standards for diesel engines. The new challenge is to see the bus fleet convert to be zero emission. The council, in partnership with Brighton & Hove buses, has secured funding from the second round of central government's Zero Emission Bus Regional Areas fund (ZEBRA2). This will pay for the electrification of Hove bus depot and by

2028 there will be 29 zero emission buses in the city. The depot electrification will allow for future buses to be electrified once the performance of the initial batch has been assessed.

The council contracts Beryl to operate the city's bike hire stations. This was launched in March 2023 and there are now 780 bikes in the fleet with 60% being e-bikes. By May 2025 we will have 108 bike hire hubs across the city, meaning the bike hire scheme is the most comprehensive the city has ever seen. The electric bikes make travelling up hills much easier, which opens new journeys and widens the appeal of the scheme.

~~There is the potential to~~ The council are currently consulting on whether to widen the hire scheme to include e-scooters.~~, although this is dependent on central government permitting their use. Once national legislation is in place, elected members will then decide whether e-scooters will be added to the scheme.~~ While private e-scooters are illegal to use, the government has allowed trials of hire schemes in England since July 2020. Hire schemes can be better regulated, requiring that e-scooter users must hold a driving license for example. Hire scheme operators can use geofencing to ensure they are parked in designated locations and can limit the speed of the scooters.

A survey conducted by Collaborative Mobility UK (COMOUK)[24] of people who use e-scooter hire schemes; half of active users travel to work or school using them. 21% said they would have used a car for their most common e-scooter journey if shared e-scooters had not been available. E-scooters can complement public transport if hire locations are co-located with bus stops. This can form the basis of neighbourhood mobility hubs. If scooters replace car trips, they will contribute to reducing carbon emissions.

Objective 3: Deliver a safe, inclusive and integrated transport system

To deliver the safe element of this objective we will:

- produce a Road Safety Action Plan with targets and actions to reduce the number of people killed and seriously injured on our roads
- update our Streetscape Design Guidance
- deliver targeted highway improvements at collision hotspots, schools and where issues have been highlighted by the public

The Road Safety Action Plan will review what measures have been successful elsewhere, investigate what the specific safety issues are on Brighton & Hove's roads. It will then have clear actions to improve safety that will be delivered through our capital programme. There are already projects within the capital programme that are focused on improving safety such as the Safer, Better Streets and School Streets programmes. The action plan will identify what additional actions are required.

To ensure we have an inclusive transport system we will:

- deliver an annual programme of accessibility improvements for pedestrians
- allocate £300,000 per year from BSIP funding to deliver accessible and safe bus stops

[24] COMOUK, 5 May 2025. Annual Shared Micromobility Report UK 2024

- work with transport providers to deliver improved outcomes for disabled passengers

We have greater influence and control over bus infrastructure, which is why we can commit funding to improve bus stop accessibility, but disabled access to the rail network is equally as important. We will seek opportunities and funding to improve access at rail stations in the city, through funding programmes such as Access for All. In addition to working at bus stops we will provide annual funding for dropped kerbs and other accessibility improvements on our pavements. We will review our streetscene guidance and publish updated Streetscape Design Guidelines to standardise our approach to providing street trees so that the impact on pavement width and condition is minimised. As street trees that are the cause of pinchpoints or uneven pavements reach the end of their life, any replacements will give greater consideration to their impact on the usability of our streets.

To improve the integration of our transport system we will:

- create neighbourhood mobility hubs that improve the interchange between public transport and other modes

Neighbourhood mobility hubs can include bike, e-scooter or car hire (through car club provision), bus stops or train stations. Integration refers to both the co-location of transport provision and the ease of use between different modes of travel. Ticketing is an area which can be greatly improved with simpler fares and access. One good example of the ease of access to low fares is the use of ‘tap on and tap off’ payment on buses being harmonised with the mobile and smart ticket offer so that users get the lowest priced ticket for their journey with minimal effort. Integration of payment and ticketing across different modes of transport is an area where much can be done. Neighbourhood mobility hubs will be created from 2029 onwards.

Objective 4: Create well-maintained streets, pavements and rights of way

To deliver this objective we will:

- dedicate funding to improving the look and feel of the city.
- lobby central government for the necessary increased funding
- deliver an annual maintenance programme which maximises the lifespan of our assets
- improve lighting on important active travel routes
- ensure that active travel routes are included in winter maintenance schedules
- continue to lobby central government for pavement parking enforcement powers

The increase in funding available for maintenance in 2025/26 is welcome. We will continue to use our evidence base about the condition of our streets to make the case for adequate levels of maintenance funding. With the resources that we do receive we will use this efficiently to keep our streets in the best condition possible. We will continue to invest in our street lighting and where funding allows improve lighting where required on well-used active travel routes.

The public consultation revealed that there was very strong support for this objective and as a result we have looked at how we can use our capital funding to support this

objective. Our project to ‘Improve the look and feel of the city’ will be focused on prominent areas and seek to deal with issues around tackling uneven pavements, greening and other public realm enhancements.

As part of our winter maintenance plan, we maintain a list of roads that are a priority for gritting to keep them clear. As new protected cycle routes are added we will make provisions for how these are kept clear in the winter and ensure that pavements on the most important active travel routes are considered in the maintenance schedules.

Objective 5: Provide active travel choices for all, and excellent public spaces

To deliver this objective we will:

- deliver city centre walkability and accessibility improvements
- enable car club growth with a more flexible model
- provide secure residential cycle parking facilities
- deliver active travel infrastructure enhancements on the A259 and A23 corridors by 2028
- deliver area wide and priority corridor active travel improvements identified in the LCWIP
- continue to deliver improvements to routes and paths that provide access to the national parks

Once Valley Gardens Phase 3 is completed, the area in front of the Royal Pavillion will be pedestrianised and become an attractive space for visitors and residents to enjoy. We want to transform the experience of using the city centre in other key locations, such as routes between the train station and seafront, and in popular retail areas. Covid-era projects have provided additional footway space in the Old Town but over the life of this plan we will develop schemes that provide excellent public spaces to support our visitor economy and improve the accessibility of the city centre.

To support active travel choices, we will enable car club growth by introducing a more flexible model that does not depend on dedicated bays but permits that allow vehicles to be parked in a wider area, rather than a fixed spot. This will reduce the cost of providing car clubs, which will open up the city to new operators and allow the introduction of vehicles to new areas.

The secure on-street residential cycle parking we have introduced has been very popular, with long waiting lists for many locations. We will continue to provide this parking and seek opportunities to expand the number of spaces available. Our current priority for active travel improvements is on the A259 and A23 corridors. These are identified in the LCWIP as priority routes. Once these are completed, and linked up by the Valley Gardens project, we will identify which priority corridor routes, already identified in the LCWIP, are to be delivered from 2028 onwards.

The LCWIP also sets out where area-wide, as opposed to corridor, improvements are desired. Our Rights of Way Improvement Plan contains details of what the priorities are for footpaths and access to the national park. Funding to deliver these projects will be identified from 2028 onwards and, in the case of area wide

improvements, could be combined with accessibility improvements for an area.

Objective 6: Promote and use technology to reduce and manage travel

Technology has great potential to improve transport in the city. Connected and driverless vehicles are likely to be on our roads in some capacity by 2035. We welcome innovation and will look to be early adopters of it. The council will not be investing or developing our own technology, rather working with the private sector to deploy technology that can deliver the objectives in this plan.

Our immediate focus is on:

- improving the availability of live parking and bus information
- ~~investigating whether the National Parking Platform can deliver improved customer experience and cost savings for the council~~
- investigating how we can tackle the issue of drivers needing multiple parking apps across different local authorities.
- replacing end-of-life signals with units that optimise traffic flows
- utilising technology to improve data collection, customer experience and enforcement, including the use of Artificial Intelligence (AI)
- utilising the Traffic Control Centre for innovative approaches to keep traffic moving in the city including for Red Routes
- seeking powers for Moving Traffic Enforcement from central government

We are in the process of updating the real-time bus information displays at bus stops and will look to make live parking availability information more widely available so that those seeking parking spaces can easily find correct and up to date information. An irritation of modern car driving is the multitude of parking apps needed to pay for parking at different locations. ~~The National Parking Platform was designed to solve this by acting as the platform which hosts multiple providers in one place.~~ We want to solve this issue and are interested in the potential the National Parking Platform ~~this~~ has to improve ~~customer experience for~~ drivers experience of parking. We will investigate how this could be introduced.

As we replace traffic signals in the city, we have already installed smart versions that are designed to respond to live traffic flows. There is also the potential for them to identify and prioritise buses as they approach. Other technology that is helping to improve bus journey times is the camera enforcement on the recently installed Red Routes. This is much more efficient and effective than relying on Civil Enforcement Officers to patrol our key transport corridors. We will seek powers from central government for Moving Traffic Enforcement, which will give us authority to effectively enforce restrictions on our network, such as School Streets and key sections of our road network. The council has recently completed a Strategic Transport Model for the city which relies on anonymised mobile phone data to understand the traffic flows into, within and out of the city. We will continue to use technology to improve our data collection and understanding of travel patterns.

Capital programme of work 2025/26

Each year we will produce a capital programme of work that is focused on delivering the objectives of Our City Transport Plan 2035. ~~The funding~~

~~allocations to the programme of projects / schemes shown on the next page have been agreed for the current financial year 2025/26.~~ The table below shows an indicative capital programme of transport projects for the coming three years. Our capital programme is largely funded from a variety of external grants, explained below. Because of this, the transport capital programme is subject to confirmation each year, via a cabinet decision, once the exact level of our grant funding is known. At the time of writing the biggest unknown is the funding we will receive for maintenance from the Local Transport Grant.

To support this capital programme some funding from the consolidated active travel fund (CATF) is used on complimentary behaviour change programmes. This includes Bikeability cycle training for children and adults, working with schools and businesses to promote modal shift and other ~~promotional~~ activities to support active travel.

Primary Objective	Project/ Scheme	Description	Funding allocations (£000's) 2026/27	Funding allocations (£000's) 2027/28	Funding allocations (£000's) 2028/29
Increase public transport use	Bus priority and targeted fare subsidies.	BSIP funded bus lanes, bus priority and accessibility and subsidies for targeted fares and support for new routes	£8,817	£8,542	£8,281
Enable the uptake and use of zero and ultra-low emission transport	EV Chargepoints	On-street EV chargepoints for residents, taxis and businesses	£903	£903	£0
Deliver a safe, inclusive and integrated transport system	Improving accessibility	Dropped kerbs accessibility programme and delivering the Public Right of Way improvement and maintenance	£610	£610	£910
	Improving accessible cycling	Bike hire facilities and cycle parking development			
	Targeted Safety Improvements	Safer Better Streets, School Streets and School Travel Plan measures, Collision Reduction, vehicle safety barriers,			
	Mobility hubs	Creation of strategic and neighbourhood mobility hubs			
Create well-maintained streets, pavements and right of ways	Carriageway maintenance	Renewals and an ongoing Seek and Fix programme	£5,283	£5,283	£5,283
	Pavement maintenance	Renewals and an ongoing Seek and Fix programme			
	Drainage, structures and lighting maintenance	Covering gullies, pipes, retaining walls lamp-columns, in-fill works on major roads and maintaining accurate data			
Provide active travel choices for all and excellent public spaces	Supporting active and inclusive travel	Delivering our LCWIP – including the A259 active travel scheme	£2,566	£2,580	£2,588
	Delivering major schemes	Major Projects match funding, Project Management support and delivery of Section 106 schemes			
	Improving the look and feel of the city	City centre renewal - road, pavement and signage enhancements, pothole prevention			
Promote and use technology to reduce and manage travel	Traffic signals	Traffic signal upgrade, maintenance and network improvement programme.	£150	£150	£150
	Future scheme development	Funding for business case development, policy creation, scheme development – e.g. mobility hubs and road network studies	£297	£297	£297
		Grand Totals	**£18,626**	**£18,365**	**£17,509**

Primary Objective	Project/ Scheme	Description	Funding allocations (£000's) 2028/29
Increase public transport use	Bus priority and targeted fare subsidies.	BSIP funded bus lanes, bus priority and accessibility and subsidies for targeted fares and support for new routes	£9,280
Enable the uptake and use of zero and low emission vehicles	EV Chargepoints	On-street EV chargepoints for residents, taxis and businesses	£903
Deliver a safe, inclusive and integrated transport system	Improving accessibility	Dropped kerbs accessibility programme and delivering the Public Right of Way improvement Plan	£200
	Improving accessible cycling	Bike hire facilities and cycle parking development	£125
	Improving safety	Safer Better Streets, School Streets, Plan Measures and Collision Reduction School Travel	£415
Create well-maintained streets and pavements	Carriageway maintenance	Renewals and an ongoing Seek and Fix programme	£3,950
	Pavement maintenance	Renewals and an ongoing Seek and Fix programme	£628
	Drainage, structures and lighting maintenance	Covering gullies, pipes, retaining walls lamp-columns, in-fill works on major roads and maintaining accurate asset data, historic	£555
Provide active travel choices for all and excellent public spaces	Supporting active and inclusive travel	Delivering our LCWIP - including the A23 & A259 active travel schemes	£1,200
	Delivering major schemes	Valley Gardens Phase 3 (match funding)	£728
Deliver a safe, inclusive and integrated transport system **Create well-maintained streets and pavements** **Provide active travel choices for all and excellent public spaces**	Delivering major schemes (support)	Project Management Support and delivery of Section 106 (developer contributions secured through planning) sustainable transport schemes	£415
Promote and use technology to reduce and manage travel	Traffic signals	Refurbishment of signalised crossings/junctions	£150
		Grand Totals	**£18,549**

Table 2: 2025/26 capital programme

Transport funding explained

The transport projects set out in the capital programme are funded through a mix of central government grants, often ringfenced for specific uses, and money from the council's own budget. Our main income streams and their restrictions are explained below:

Bus Service Improvement Plan (BSIP): First introduced in 2022/23, and covering three years up to 2024/25, this central government grant is for both capital schemes (like bus lanes) and revenue schemes (like subsidised fares for children). We were awarded £27.9m in 2022. In the second phase of BSIP funding, which covers one financial year, 2025/26, we were awarded £9.1m.

Local Electric Vehicle Infrastructure Fund (LEVI): We secured £3.3m from central government's LEVI fund, which is ring-fenced for EV chargepoint sockets. This funding is to be spent over the coming three years 2025/26 – 2027/28. After this it is envisaged that the council's network of chargepoints will be self-financing.

Consolidated Active Travel Fund (CATF): Administered by the central government body Active Travel England the CATF was introduced in 2025/26 to replace separate funds for infrastructure and behaviour change schemes that promote modal shift to active modes. In 2025/26 the council was awarded £1m.

Local Transport Grant (LTG): Introduced in 2025/26 this replaces the Integrated Transport Block (ITB). The LTG, like the ITB, is determined by a formula (central government set a national budget and this is then apportioned to local authorities based on population and deprivation levels). The grant is provided for maintenance and delivering new schemes, with central government deciding how much of the grant can be spent on each. LTG funding announcements cover a three-year period to give local authorities better long term funding certainty. Capital and resource allocations, for delivering new schemes, have been announced but the grant for maintenance is yet to be set. In 2026/27, and each of the next two financial years we will receive around £3.4m

Parking Surplus: Any surplus from income generated by penalty charge notices or parking permits is ring-fenced for transport use. Typically, this is used to pay for bus passes that older people qualify for. A detailed breakdown of spending is provided in an annual report.

Section 106: This funding is received from developers when they build a new development that will require changes or mitigation to the transport network in the vicinity of the development.

Community Infrastructure Levy (CIL): The CIL is a charge which can be levied by local authorities on new development, for example new residential and office spaces to pay for infrastructure across the city. This includes transport improvements (such as cycleways, bus stops and roads) schools, and other facilities.

~~**LTP Highway Maintenance Block & Integrated/Sustainable Transport Block:** Each year we receive a Local Transport Plan allocation from central government, and this is split between funding we can spend on maintenance and funding we can spend on delivering new schemes. This is the grant that we have the most power in determining what it is spent on. The level of funding we receive is determined by a formula (central government set a national budget and this is then apportioned to local authorities based on the road length they manage and other criteria). Historically this funding would be set for a three-year period, but post pandemic allocations have been annual, making medium term planning more difficult. In 2025/26 we have been awarded £5.3m for maintenance and £3m for new schemes. The maintenance allocation is a substantial rise from the £1.5m awarded in 2024/25.~~

BSIP funded bus lanes, bus priority and accessibility, subsidies for fares and routes. These projects are funded by a grant dedicated to delivering our Bus Service Improvement Plan (BSIP - see above box; transport funding explained). We aim to improve bus journey reliability and grow bus usage. A detailed Bus Network Review has been used to prioritise which schemes can best meet this aim. A full list of schemes was included in a March 2025 report. Designs have already been consulted on for important bus corridors on Marine Parade (A259) and the A23 in Patcham and further schemes will be brought forward. The BSIP grant has also allowed us to fund the launch of new services, such as the 1x bus, provide on-going funding for bus routes to areas of the city where a commercial service is not viable and deliver targeted fare subsidies, such as those which exist for young people in the city. This is in addition to the funding for concessionary fares for older people, which is paid from the council's own budget, typically from parking surplus. BSIP funding has been allocated to assist in identifying and bringing forward existing car parks that are suitable for Park & Ride operations. While the immediate focus is on setting up Park & Ride facilities to ease congestion in the city centre in future years this project can look at improving neighbourhood mobility hubs that allow for better integration of public transport with other modes.

EV Chargepoints. This project is funded from LEVI money (see above box; transport funding explained). Brighton & Hove already has one of the densest networks of public chargepoints in the UK, with the vast majority of households who lack access to off-street parking, already within a 5-minute walk of a chargepoint. This project will deliver a minimum of 1,650 sockets and provide even more convenient access to public chargepoints for those who need them most. Our Electric Vehicle Charging Plan, which is in development, sets out in detail our approach to delivering this infrastructure.

Improving accessibility. This project provides dedicated funding which allows us to meet resident requests for small scale accessibility improvements such as handrails and dropped kerbs to make crossing the road easier. It also funds improvements on our network of paths which link the city to the South Down National Park.

Improving accessible cycling. This project will allow for continued provision of residential cycle parking storage and the city's bike hire stations.

~~**Improving safety**~~ **Targeted Safety Improvements.** This project provides funding for safety focused schemes such as the Safer, Better Streets programme, whereby

schemes are developed in response to issues raised by residents that are supported by councillors. It also covers work on School Streets and supporting schools to create School Travel Plans. It will also fund a programme to ensure vehicle safety barriers in the city are located in the right place and meet required standards.

Mobility Hubs. Initial business case development for a strategic mobility hub, with Park & Ride as a central feature, will be funded from the future scheme development budget. The business case will identify a preferred location and any supporting measures needed to make the scheme a success. This will also develop pilot neighbourhood mobility hubs. Dedicated funding provision for mobility hubs in 2028/29 has been made on the assumption that progress has been made on the strategic case for park and ride and more significant funding is needed to progress the scheme further.

Maintenance. Three projects are dedicated to maintaining our roads, footways and associated infrastructure like drains and lighting. All are delivered using ~~LTP~~ LTG maintenance funding. Detailed condition surveys for our highway assets are used to direct where the limited funding can achieve maximum value for money. For many years the level of funding available for maintenance means that our highways have been in managed decline. The level of maintenance funding shown will arrest this decline.

Supporting active and inclusive travel. This project seeks to deliver the improvements set out in the Local Cycling & Walking Infrastructure Plan using ~~LTP~~ LTG and CATF grants (see above box; the council funding explained). The immediate focus is on delivering infrastructure on two priority corridors; A259 and A23. This will create improved pedestrian facilities and cycle lanes that are protected from traffic, making cycling accessible to a far wider range of people who might not cycle on roads with heavy traffic. The Consolidated Active Travel Fund also provides funding to support behaviour-changing initiatives that the council provides, such as offering schools free cycle training.

Delivering major schemes. Our immediate focus is on completing the third phase of the Valley Gardens project, which will deliver a transformed public space around key visitor destinations, Brighton Pavillion and Palace Pier, in the city centre. Funding for this project has come from the ITB ~~LTP~~, the council's own resources, and the Local Growth Fund. The scheme features a simplified road layout, a better experience for public transport users and improved spaces for pedestrians and cyclists. The completion of the Valley Gardens project will see a priority north/south active travel route connected to the seafront east/west routes which are all part of the National Cycling Network (NCN). This funding ensures the necessary project management and design work is in place to both develop and oversee the delivery of schemes that are detailed above and schemes that are funded by funding secured from developers, as part of their planning permission.

~~A future priority will be city centre improvements, including to the public realm and the access arrangements, particularly for pedestrians.~~

Improving the look and feel of the city. The objective of 'creating well-maintained streets and pavements' gained the most public support during the consultation. In response we have brought forward delivery of this project to improve city centre walkability and expanded its scope beyond the city centre. We want to make sure

our city is accessible to everyone who is walking and wheeling. By renewing our streets we have tackle accessibility issues, add more greenery and other enhancements to make Brighton & Hove a place that people want to visit.

~~**Delivering major schemes (support).** This funding ensures the necessary project management and design work is in place to both develop and oversee the delivery of schemes that are detailed above and schemes that are funded by funding secured from developers, as part of their planning permission.~~

Traffic signals. This project funds the upgrade of traffic signals with intelligent systems that respond to live traffic flows. This smooths the flow of traffic and improves journey times.

Future scheme development. This funding stream will be used to make the case for major schemes such as Mass Rapid Transit and Strategic Mobility Hubs at the edge of the city. Delivery of these projects will require external funding and to secure this we need to demonstrate that the projects would be good value for money. It will also be used to undertake network studies of roads to identify how congestion can be tackled. New policy documents such as the Road Safety Action Plan and Streetscape Design Guide will be delivered from this funding.

Capital Programmes beyond 2028/29 ~~2025/26~~

~~Levels of funding beyond 2025/26 are not known. Currently central government confirms an annual funding allocation before the start of the new financial year. The council's Cabinet then decides how to apportion funding between projects. This process may change because the council, along with East and West Sussex County Councils are part of the devolution priority programme. This will create a Mayoral Strategic Authority, a new government body, which may have responsibility for strategic transport across Sussex, Brighton & Hove. It is expected that a mayor will be in place by 2027.~~

~~The final version of Our City Transport Plan 2035 will set out a three year delivery plan up to financial year 2028/2029~~

We have set out in Figure 13 below the schemes that we aspire to deliver through our annual capital programmes over the course of this plan. ~~Some~~ Schemes described as on-going programmes already exist and ~~are existing ones that~~ we plan to continue throughout the 10-year life of this plan. Typically, these involve the provision of a service such as our planned roads maintenance, subsidised bus routes, bike hire and behaviour change schemes. Also included are some projects such as our Improving accessibility and Improving safety projects, which tend to be smaller scale changes to the highway. Larger projects which alter road layouts or use are shown as individual schemes with a proposed start and finish date.

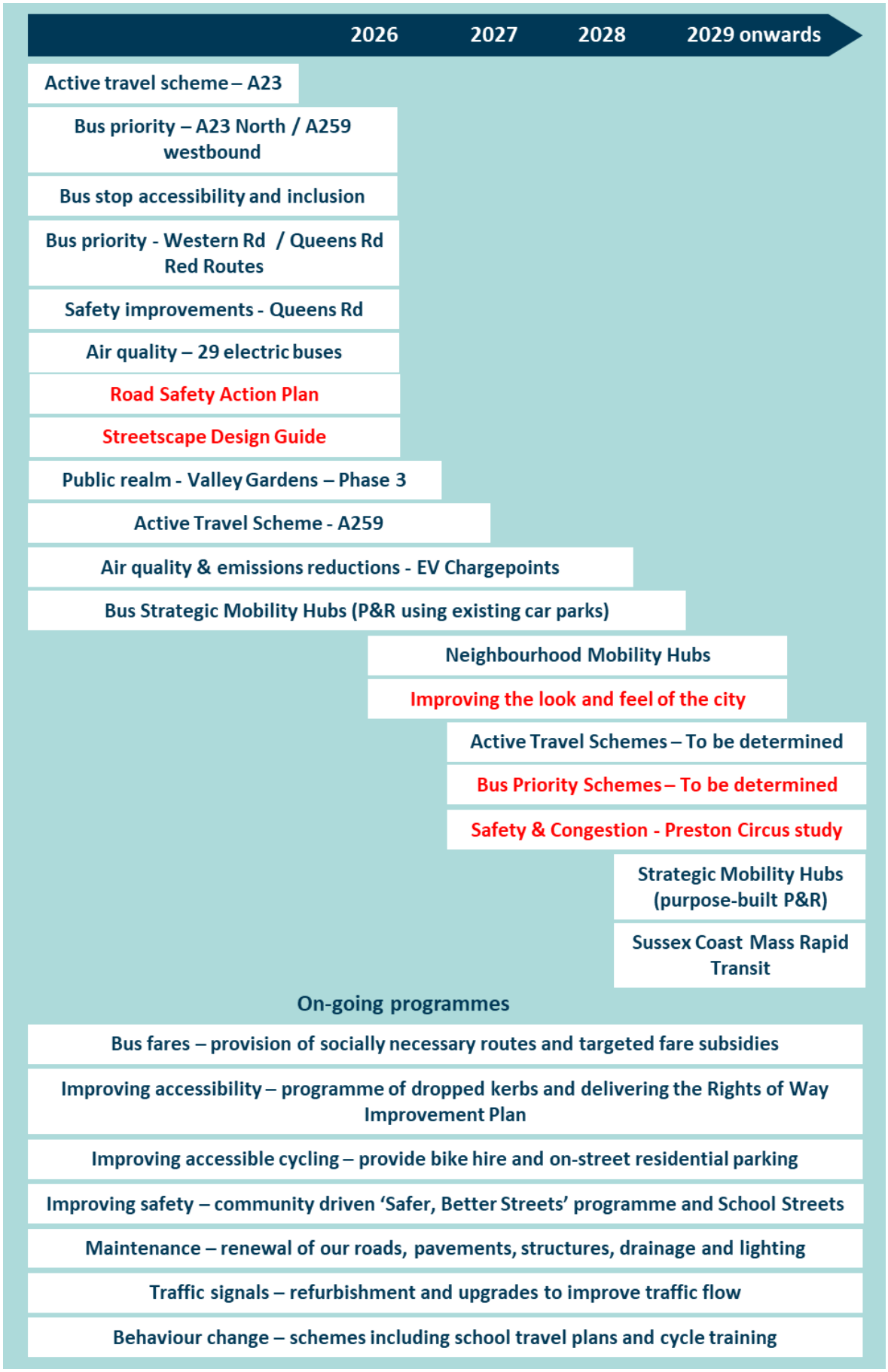


Figure 13 Summary of capital projects and ongoing works proposed in Our City Transport Plan 2035

Schemes in Figure 13 shown taking place in financial years 2025/26 up to 2027/28 are already being actively worked on, either being designed or built. ~~Valley Gardens Phase 3 and the A23 active travel scheme are being constructed with the A23 active travel scheme due to be completed in 2025 and the larger Valley Gardens Phase 3 scheme by the end of 2026.~~ The A23 active travel scheme was completed in 2025 with new stepped cycle tracks created along Preston Park and more space for pedestrians and cyclists on Preston Road. The third and final phase of Valley Gardens is in progress with work due to be completed in 2026.

Councillors have approved in principle the creation of red routes on Western Road and Queens Road and an outline design for the A259 active travel scheme. Detailed designs are currently being prepared for these schemes. Funding is in place for delivery of 29 fully electric buses, a minimum of 1,650 chargepoint sockets and safety improvements on Queens Road. We are also working with owners of car parks to deliver Park & Ride spaces that will serve the city centre. In summer 2025 the University of Sussex Falmer Campus was used to provide a Park & Ride on selected days. Future opportunities will also be investigated and lessons learnt used to inform the development of a business case for a purpose built Park & Ride facility. ~~Three schemes are planned from 2027/28 onwards: neighbourhood mobility hubs, a major scheme to improve the walkability of the city centre and additional active travel schemes.~~

In financial year 2026/27 we plan to begin, subject to confirmation of funding, two new schemes; Improving the look and feel of the city and exploring where neighbourhood mobility hubs could be located. Improving the look and feel of the city is described above. Neighbourhood mobility hubs will provide a focal point to seamlessly integrate different modes, such as public transport with shared and active mobility. Often, they provide a first or last mile connection to the nearest bus or railway station and provide alternatives to private car travel. The exact form mobility hubs take will be fully defined once the project gets underway.

In 2027/28 we anticipate initiating schemes on improving new active travel corridors, delivering additional bus priority measures and undertaking a study of the road network to identify how congestion can be tackled. By 2027 that work on the A259 active travel scheme will be substantively complete and the funding we receive from Active Travel England will be focused on another of the priority corridors in our LCWIP. Exactly which priority corridor we will work on next has yet to be decided but we will look to make connections with existing high-quality routes to create a connected network across the city suitable for all to use. Future bus priority measures are in the process of being identified to see which are feasible and will have the greatest impact. Future updates of the BSIP will confirm what measures are taken forward.

~~**Neighbourhood mobility hubs.** Mobility hubs provide a focal point in the Transport network that seamlessly integrate different modes, especially mass public transport, shared and active mobility. While the city has good provision of car club vehicles and a bike hire scheme, not all areas of the city are covered by them. We want to explore whether neighbourhood mobility hubs can extend provision and give greater transport choices to all areas of the city~~

~~**Improving City Centre Walkability.** The city centre, with its great cultural and retail~~

~~offerings, is a major reason why people come to visit our city. The streets make up a large part of the public realm and how people experience the city centre. We want to explore how we can improve the look and feel of the city centre. To make sure it is accessible to everyone who is walking and wheeling. We propose that it is the focus of our next major scheme.~~

~~**Future Active Travel Schemes.** Our LCWIP has already identified priority routes and areas for further active travel schemes. We are working on two priority corridors (A23 and A259) at the moment and once these are completed we will begin work on the other routes and areas so that we create a connected network across the city suitable for all to use. 100k per year has been allocated for this purpose and can be combined with the funding allocated under the title of Supporting Active and Inclusive Travel.~~

From 2029 onwards we would plan to deliver, in conjunction with other local transport bodies, a Sussex Coast Mass Rapid Transit scheme and a purpose-built Strategic Mobility Hub. ~~While our ambitions are subject to funding, Table 3 below indicates how we would distribute additional funding across our capital programme. should we benefit from a rise in central government funding from 2026/27. As funding levels are unknown, Table 3 (deleted) is indicative only. we have included an indication of whether our ambition is to keep funding the same, increase or decrease it.~~ Park & Ride would form the core of any strategic mobility hub. The aim would be to alleviate congestion in the city centre and improve the experience of visitors, residents and businesses using our road network. A mass rapid transit scheme would be a high-capacity public transportation system designed to move large numbers of people efficiently. It would aim to increase mobility across Sussex, reduce air pollution by providing an alternative to cars and support economic growth. Both these schemes would require significant capital sums, most likely from central government, to take forward. Scheme development would focus on creating a business case to demonstrate that the projects are worth investing in.

Quantifying Carbon Reduction

This section sets out what the baseline carbon emissions are from usage of the road network within Brighton & Hove City Council's administrative area. It also estimates what carbon emission reductions could be expected from the policies contained in this plan.

The scope of this exercise is limited to territorial road emissions because in our role as the local transport authority we have a reasonable degree of influence over them, unlike for example the rail network which we have no direct oversight or management of. We are doing this because central government has committed to making quantification of carbon reduction a fundamental part of local transport planning and funding decisions, as set out in the DfT's Transport Decarbonisation Plan[2]. To estimate carbon emissions, we have made use of the Carbon Assessment Playbook (CAP), developed by England's Subnational Transport Bodies specifically for this purpose. The CAP is an evidence-based tool that can be consistently applied across England.

What is the Carbon Assessment Playbook?

Parts of the CAP are publicly available on-line. The CAP includes a dashboard, estimating what emissions were produced from the road network in the council area from 2005 up to 2019.

2019 is used as a baseline year as it is unaffected by the Covid pandemic. The dashboard also shows three scenarios of what future emissions, from 2019 to 2050, are likely to be. In this plan we have chosen to show just one of the future scenarios as a future baseline for clarity and simplicity. Our chosen scenario takes account of the Zero Emission Vehicle (ZEV) mandate, which came into effect in 2024, and local factors that will affect the rate of EV uptake by consumers. The ZEV mandate is a national policy that requires car manufacturers to sell an ever-increasing percentage of zero-emission vehicles each year up until 2035, by which time 100% of new cars and vans must be zero-emission. The policy is backed by financial penalties for manufacturers not meeting the targets.

In addition to the baseline data and projection of future emissions there is a 'Policy Builder' tool. This tool has 29 different policy areas which can be built into packages of measures. The CAP allows us to input where and when we would implement different policy measures in the city and it then estimates what the cumulative impact of the chosen policy measures will be. While the CAP is an excellent first step in developing our understanding of the impact of different policy measures the Policy Builder tool is not comprehensive. To account for this there is provision within the CAP to estimate carbon reductions without identifying specific policy measures that will achieve this outcome. For example, the Policy Builder tool does not include measures that reduce HGV traffic, so the CAP provides estimates of what the carbon emissions impact of reducing HGV traffic by set percentages is. Our City Transport Plan 2035 Evidence Base sets out further detail on how we have used the CAP to estimate carbon reductions shown in this plan.

Figure 14 on the next page shows the output of our work to estimate what impact the policies contained in this plan will have on reducing carbon emissions from 2019 to 2050. The graph shows three lines. The future baseline is an estimate of future emissions excluding any policies set out in this plan. Our City Transport Plan 2035 is an estimate of what our future emissions would be if all elements of this plan are delivered. Finally, the CCC national balanced pathway shows the national pathway to Net Zero scaled down to apply to local emissions in Brighton & Hove. As with any modelling exercise of future events it is based on a set of assumptions about what is likely to happen and is an informed guess, not a prediction.

The future baseline in the graph is based on funded national policy commitments, such as the ZEV mandate (see above box) and is based on estimates of what the uptake of EVs will be in the local area. It is important to understand that the CCC national balanced pathway is only included as a rough guide of what emissions need to be reduced by. It is not a target that we must achieve. Each local authority across the country will make progress on reducing carbon emissions at different rates depending on local factors such as the rate of EV uptake, or the ability for a particular area to shift short car trips onto less carbon intensive modes. The CAP tool doesn't provide a localized transport decarbonisation pathway that takes account of

local circumstances, meaning that there is no specific emissions reduction target for Brighton & Hove.

The graph shows that while Our City Transport Plan 2035 policies will make a positive impact on reducing carbon emissions there remains some way to go to get close to the CCC balanced pathway. In 2035 the future baseline projection is that 149ktCO2e will be emitted from use of the road network. If the policies within this plan are all delivered, we estimate that emissions will be reduced to 130ktCO2e.

It may be that some other local transport authorities, where EV uptake is very rapid, are delivering greater carbon reductions than the CCC balanced pathway. However, given that the Brighton & Hove area sees an average uptake of EVs, which is the largest factor in reduced emissions, it seems reasonable to assume that more needs to be done to reduce emissions.

There is however a limit to what can be achieved through local transport policy and implementing measures that are solely focused on carbon emission reduction, which risk being unfair on those less able to afford the switch to EVs and making Brighton & Hove unattractive as a place to visit or for businesses. We need to take an approach that balances emissions reduction with the need to encourage growth and be equitable to residents. Additional action may be better achieved through national policies, rather than local. The switch to EVs will necessitate a change to how vehicles are taxed, as zero emission vehicles are exempt. Currently there is a weak link between the costs of owning and running a car and how much it is used. If the current Vehicle Excise Duty was scrapped in favour of a national system that taxed according to how much a vehicle was used this could be a powerful tool in reducing car use and tackling congestion.

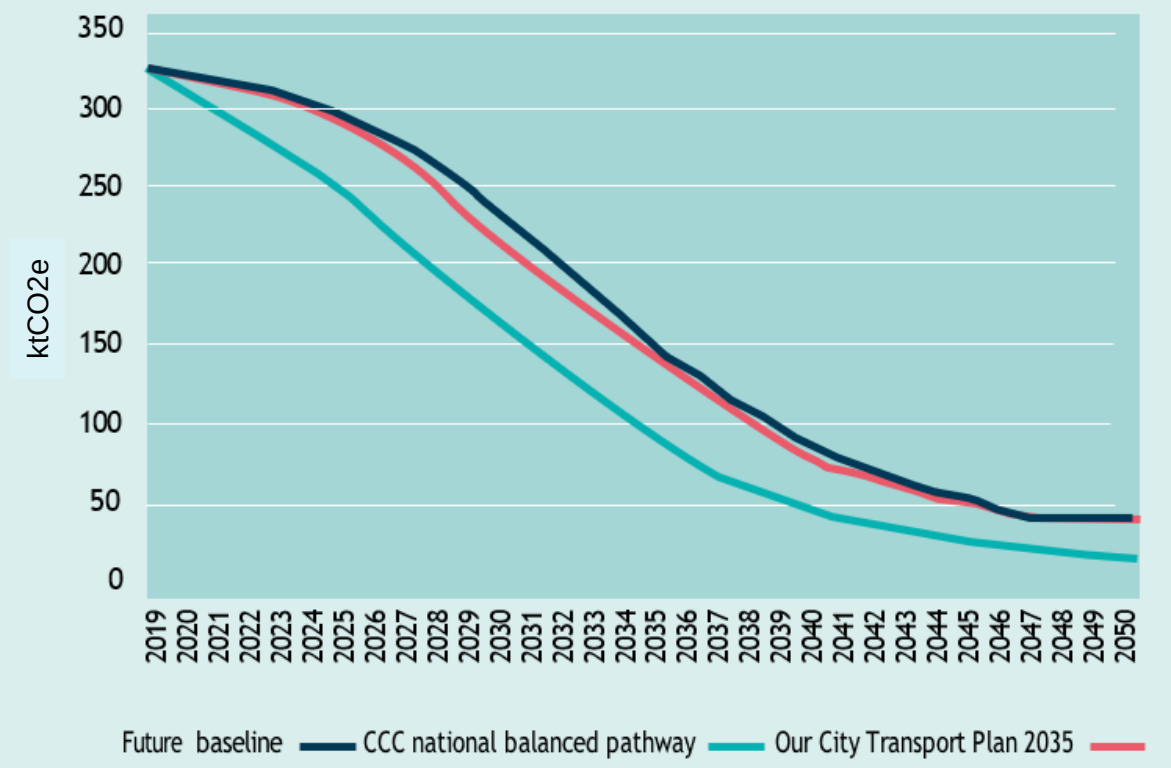


Figure 14 Projected future emissions from road transport within Brighton & Hove

Monitoring

It is important to note that it is not possible to measure or quantify everything that has been detailed in this plan. Where it is possible we have chosen the following Key Performance Indicators (KPIs), which can be monitored to provide an indication of progress. Some of the outcomes we propose monitoring are beyond our direct control but will give an indication as to how well transport is performing in the city.

Objective	KPI	Baseline 2024 (unless stated)
Increase public transport use	Journey times	1.20% increase [25]
	Punctuality	75% [26]
	Passenger satisfaction (overall)	73% [25]
	Passenger satisfaction (fares)	60% [25]
	Passenger journeys (in millions)	41.1 [27]
Enable the uptake and use of low and zero emission vehicles	Number of charging sockets delivered	500 [28]
	Households without off-street parking within a 5-minute walk of a public chargepoint	83.1% [29]
	Percentage of battery electric vehicles out of total vehicles registered in Brighton & Hove	2.1%[13]
Deliver safe, inclusive and integrated transport system	Accessibility of public transport - how easy buses are to get on/off	79% [30]
	Provision dropped kerbs - drop kerb at crossing points	53% [29]
	Number of people Killed or Seriously Injured in traffic collisions	153 [31]

[25] BSIP 2025 Refresh.
[26] Brighton & Hove City Council, 18 July 2024. 2023/24 year-end performance and target setting for 2024/25
[27] DfT, 19 March 2024. Annual bus statistics:year ending March 2023 (revised).
[28] Brighton & Hove City Council, 5 August 2024. City named number one for Electric Vehicle charging
[29] Field Dynamics, 2024. On-street households EV charhing report for 2024.
[30] NHT, 2024. 2024 NHT Public Satisfaction Survey Report - Brighton & Hove City Council.

Objective	KPI	Baseline 2024 (unless stated)
Create well-maintained streets and pavements	Proportion of principal roads in critical condition	18.32% [26]
	Proportion of non-principal roads in critical condition	14.96% [26]
	Proportion of unclassified roads in critical condition	7.89% [26]
	Public satisfaction - Condition of highways Public satisfaction - Pavements & footpaths (overall	22% [30] 39% [30]
Provide active travel choices for all and excellent public spaces	The proportion of physically active adults	80.40% [26]
Promote and use technology to reduce and manage travel.	Average delay on local main road network - seconds per vehicle per mile	111 seconds per vehicle per mile (2023) [32]
	Population with access to fibre optic - Superfast 30 Mbps and faster Coverage	99.3% (Feb 2025) [33]

Table 3: proposed Key Performance Indicators

[31] DfT, 29 May 2025. Road safety statistics

[32] DfT, 6 March 2025. Road congestion and travel time

[33] thinkbroadband, 2025. Local Broadband Information

Brighton & Hove City Council

Our City Transport Plan 2035:
Supporting Evidence Base

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1. Part 1: Brighton & Hove's transport infrastructure

1.1. This evidence base has been used to compile Our City Transport Plan 2035. It is published alongside the plan so that it is clear what information was used to formulate the plan and how issues and actions have been identified.

1.2. There are five parts to the evidence base. The first provides an overview of the city's physical transport infrastructure, an assessment of its performance and impacts, and a consideration of what changes are known about or planned. The second part is centred around understanding how people travel in Brighton & Hove and how well the transport network is meeting those needs, depending on the type of journeys being made.

1.3. The third part of this evidence base considers what the carbon emissions of the transport network are and the reductions in emissions this plan is likely to deliver. It directly responds to the commitment made in the Department for Transport's (DfTs) Decarbonising Transport policy which states that quantifying carbon emission reductions will be a fundamental part of local transport planning. The fourth part collates relevant national, regional and the council's specific policies that inform Our City Transport Plan 2035. The fifth concludes the document by summarising the main challenges the evidence base has identified.

1.4. Population & communities

1.5. To understand people's travel behaviours and needs requires a knowledge of the city and its population. Brighton & Hove is a tightly constrained, compact city situated between the South Downs National Park and the sea. In 2021, the population was 277,100. The city's population increased at a lower rate (+1.4% between 2011 and 2021) than the South East region (+7.5%) and England and Wales (+6.3%)[1].

1.6. There is lot of demand to live in the city, but providing an adequate supply of housing to meet this demand is challenging. The result is that housing affordability is an issue. In 2022, those on the lowest 25% of earnings needed 12 times their earnings to afford a property in the lowest 25% of house prices[2]. Left unchecked, this is likely to result in greater commuting into the city as people seek more affordable housing outside the city. In the decade up to 2021, there has been a net influx of 4,640 people into the city from London and other areas of the UK, while there has been a net migration of 2,335 people out of the city to East and West Sussex[3].

1.7. The city has a below average proportion of the population over 60 and under 16 (see Figure 1.). There is an above average proportion of those aged 15-52, and the two universities mean there is a very high proportion of people in their early 20's. Growth over the next 20 years is likely to be strongest in those people aged 60 and over.

[1] Census 2021; population and household estimates, England & Wales.
[2] Council Plan 2023 to 2027; earnings and tenure.
[3] Brighton & Hove Joint Strategic Needs Assessment, March 2024

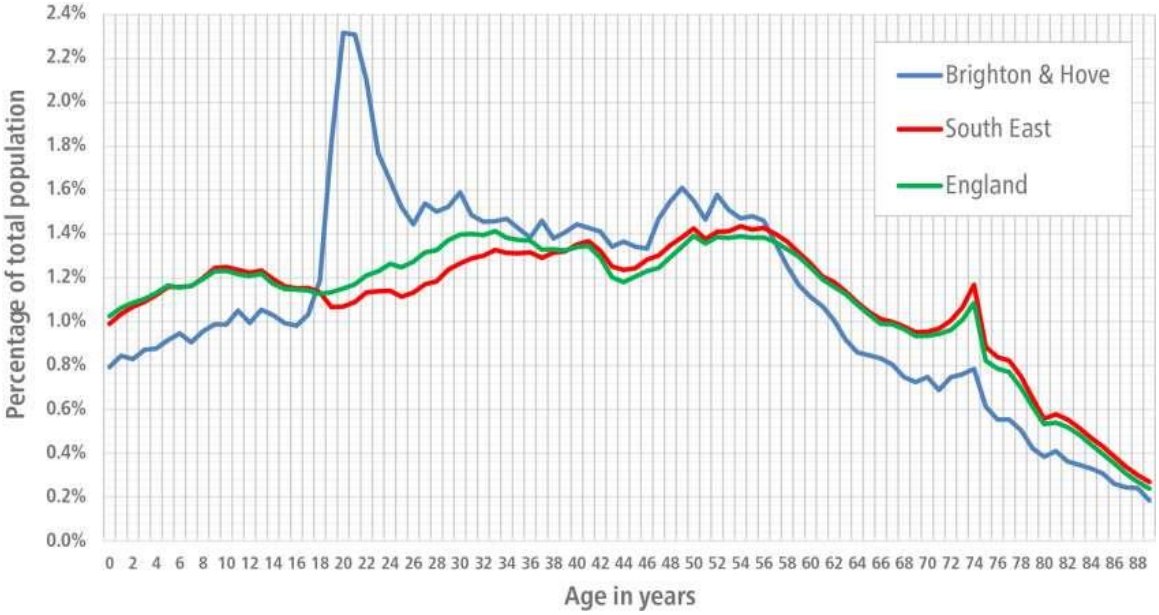


Figure 1. Brighton & Hove Population Profile, June 2021 (Source: Council Plan 2023 to 2027, Brighton & Hove demographics)

1.8. In 2021, 26.2% of residents were employed in professional occupations, which is higher than the English average of 20.3%. The largest employment sectors by broad industrial groups are health (16.3%), retail (11.3%), and education (11.3%)[4].

1.9. Employment is concentrated in the centre of Brighton, where a well-defined network of retail and office space is located. Health services providers, particularly the hospitals in Kemptown and Elm Grove, are the largest employers. The University of Sussex and the University of Brighton, with campuses located in Falmer and Moulsecoomb, also contribute significant employment opportunities. Smaller industrial estates and offices are scattered throughout Brighton & Hove.

1.10. The area administered by the council includes settlements such as Woodingdean, Ovingdean, and Rottingdean, which are separated from the main urbanised area by agricultural land. Forty percent of the council's administrative area is within the South Downs National Park, which borders the urban areas to the north and east. The National Park designation protects the existing character of the Downs for residents and visitors to enjoy. It also means that the city is largely constrained within its existing boundaries, and future development to accommodate jobs and housing growth must be within these boundaries.

1.11. Areas where new residential and commercial developments are welcomed are outlined in City Plan Part 1 and 2. Figure 2 shows the 8 development areas where most new development is anticipated. Some of this has already been delivered or is being built, such as along the Lewes Road corridor or at Hove station. New development is planned in areas with existing levels of good public transport provision to encourage the adoption of sustainable modes of transport.

[4] Census 2021; employment and level of qualifications.

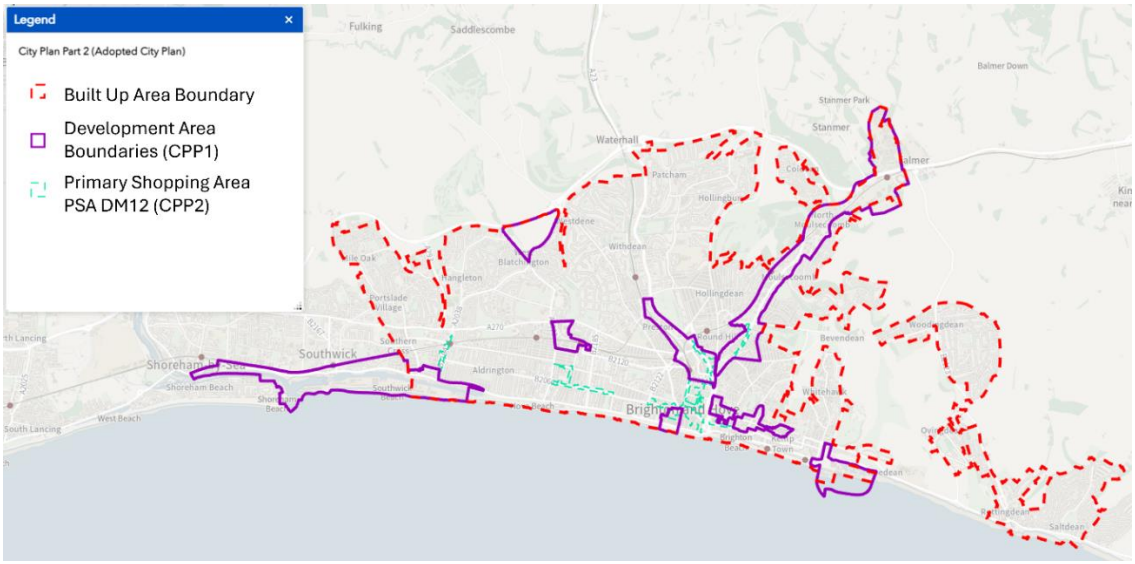


Figure 2. Planning policies showing development areas, the built-up area and National Park area (Source: Adopted Policies Map)

1.12. Population density, which is hugely important for the viability of public transport and ensuring that services are within walking distances of neighbourhoods, varies greatly across the city. Generally, the more historic areas of the city, apart from the city centre, which has lower residential density because of the large number of buildings used for commercial activity, have much high population density. Those areas of the city developed between 1945 and 1990, which tend to be further from the centre, have lower population densities and were often designed with the expectation that residents will rely on motor transport to access goods and services. Figure 3. Brighton & Hove population densitybelow shows the different population densities across the city.

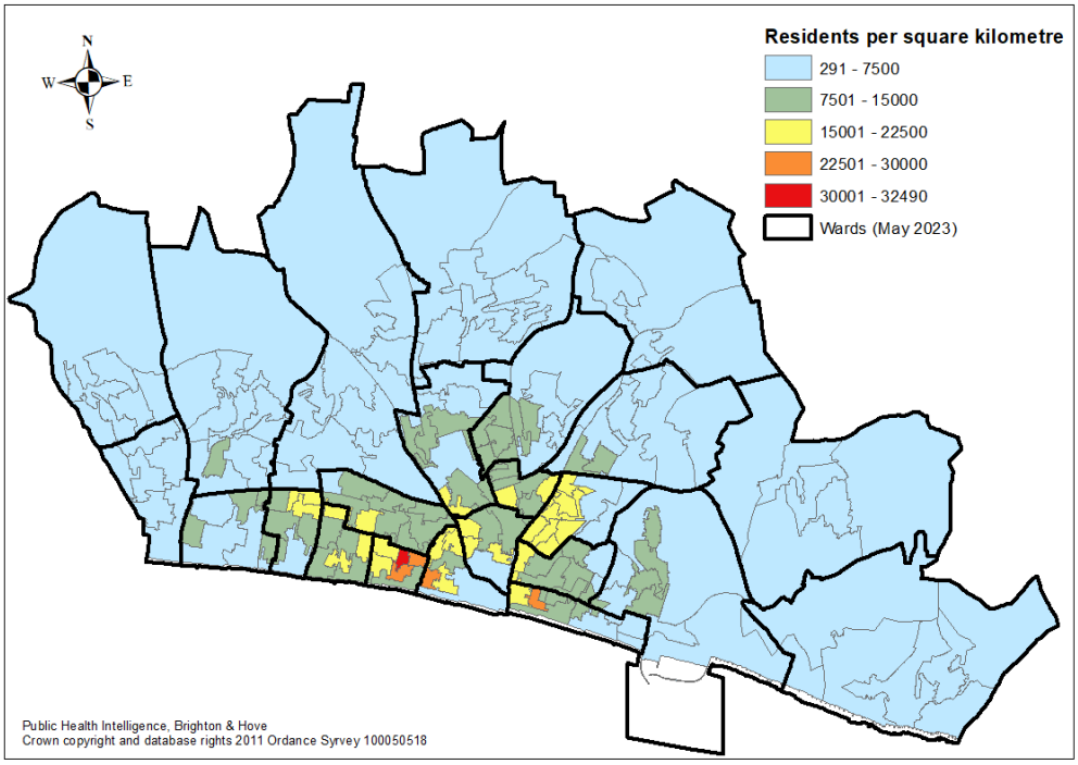


Figure 3. Brighton & Hove population density

1.13. There are concentrations of deprivation in both the centre and more outlying areas of Brighton & Hove. However, low-income households in more central areas generally have excellent access to services whereas low-income households living in more outlying areas are at risk of transport-related social exclusion[5]. This means that they will face significant disadvantages in accessing essential services such as employment, education, health and banking.

1.14. Figure 4 below shows the areas of the city at risk of transport-related social exclusion: Woodingdean, Bevendean, Coldean, Mile Oak, Hangleton, and parts of Hollingbury. Low-income households in these areas may be spending a large proportion of their income on private transport. Alternatively, households in these areas who lack access to a car, will face significantly longer journeys to access essential services.

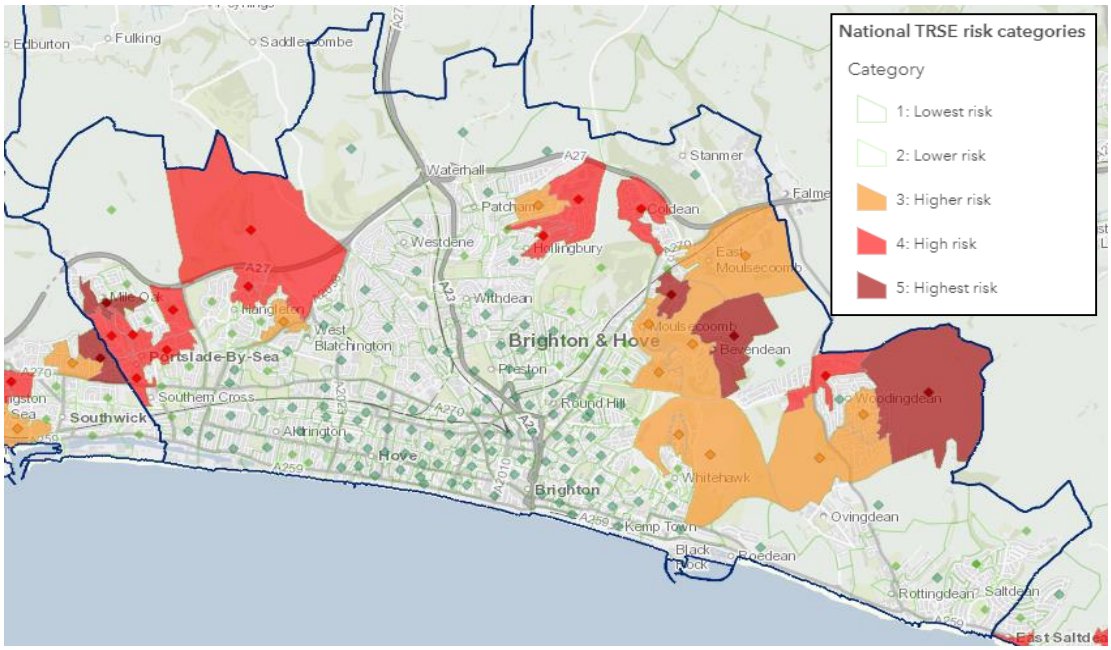


Figure 4. National transport-related social exclusion risk categories map. Source: Transport for the North.

1.15. Transport infrastructure overview

Roads & pavements

1.16. The council is responsible for managing and maintaining the vast majority of roads and pavements in the city. We are responsible for 621km of roads and 1,026km of footway (pavements alongside roads). The exceptions are roads considered to be of national importance, which are classified as part of the Strategic Road Network (SRN). The A27 and A23 north of the A27, as shown in Figure 5 below, are part of the SRN. These are managed by the central government body National Highways.

1.17. Below the SRN in the hierarchy of roads is a middle tier referred to as the Major Road Network (MRN), which is made up of busy and economically important A roads. The MRN and the rest of the road network, from B roads to the unclassified streets which make up the majority of the network, are managed by us.

[5] Transport Related Social Exclusion; Transport for the North research

1.18. The classification of roads into Motorways, A roads, B roads and local roads is what many people will be familiar with. However, within the field of transport planning, there has been an increasing recognition over the past two decades that roads, outside the SRN, do not solely exist to move traffic. In addition to their traffic movement function, streets also provide for parking, loading and other uses. Streets, particularly those adjacent to cultural institutions, cafes and parks are important public spaces, where people visit to spend time.



Figure 5. The Strategic and Major Road Networks in the local area

1.19. This approach to managing roads is set out in technical guidance published by the DfT, the Manual for Streets. It provides advice on how lightly trafficked streets and important locations such as high streets should be designed so that their 'movement' and 'place' functions are both considered. When road improvement schemes are undertaken, we consider the movement and place functions of the space when designing the new layout.

Other public paths

1.20. In addition to footways, we are responsible for a further 159km of footpaths, bridleways, and byways. These are mostly located on land north of the A27 or in the east of the city. The council has published a Rights of Way Improvement Plan 2017-2027 setting out how these paths will be managed and improved. The priority is on improving connectivity to green spaces and accessibility for diverse users. The council maintains a map of public rights of way on its website. Table 1 lists the number and length of each public rights of way type.

Public right of way type	Number	Length (km)
Footway	574	86
Bridleway	56	63
Restricted Byway	8	7
Byway	8	3

Table 1. Public Rights of Way within Brighton & Hove, type and length

Bus infrastructure overview

1.21. Buses are the most important form of public transport within the city, with annual bus journeys more than double those made by rail. We support bus services by dedicating road space for bus lanes and managing the bus stops, shelters, and real-time bus information on the city's footways. Bus lanes are concentrated on the MRN and in the city centre.

1.22. There are approximately 6.5km of bus lanes in both directions on the A270 Lewes Road, which connects the city centre to the two university sites in the north-east of the city. The A23, London Road, which runs from Patcham in the north to the city centre in the south, has approximately 1.3km of bus lane, with the majority in the southbound direction. The A259 seafront road Marine Parade, which runs east/west also has about 2km of bus lane in the settlements of Rottingdean and Saltdean.

1.23. In the city centre, there is a mixture of bus lanes and bus gates to give buses priority on the road network. This includes significant provision on Edward Street, North Street, and Western Road.

1.24. The infrastructure that we maintain supports the operation of buses provided by the privately run bus operators in the city. The Brighton & Hove Bus Company (owned by the Go-Ahead Group) is by far the most significant operator, providing about 96% of services. Compass Travel operate some subsidised routes in the city while Stagecoach and Metrobus tend to provide longer distance connections to settlements across Sussex. The Brighton & Hove Bus Company route map is reproduced in Figure 6 and Figure 7.



Figure 6. Brighton & Hove Buses Route Map



Figure 7. Brighton & Hove Buses Central Brighton map with updates from October 2024

1.25. The council subsidises bus services to areas of the city that would not otherwise have direct services. Brighton & Hove Buses operate the 21, 77, 78, and 79 subsidised services, while Compass Travel operates the 16, 37, 47, and 52 City Buzz subsidised services. The council also subsidises some school bus services.

1.26. A significant proportion of bus journeys are made by people using a concessionary bus pass; people who are of pensionable age and people with qualifying disabilities. There are over 42,000 pass holders in Brighton & Hove, of whom 7,000 are issued to disabled residents. The cost of these journeys is met by the council under the English National Concessionary Travel Scheme, at a cost of approximately £10.2 million in 2024/25.

1.27. The council published a Bus Service Improvement Plan (BSIP) in 2021, setting out how we would use £27.9 million of central government funding to improve services between 2022 and 2025. This plan has been refreshed and a further £9.3 million of funding secured from central government for the financial year 2025/26.

Cycle infrastructure overview

1.28. People on cycles can make use of the wider road network, but the risk of injury from a collision with a car, van, or lorry is a major deterrent for many people who might otherwise cycle. This is especially the case on roads with high traffic volumes. Cycle facilities, which are segregated from heavier and faster motor traffic, are needed on busier roads to make it a viable option for the majority of people.

1.29. Quantifying the amount and quality of cycle infrastructure in Brighton & Hove is not straightforward. Cycle lanes, which do not physically segregate cyclists from motor traffic, generally do not meet the most recent design standards as set out in the DfT's guidance note LTN 1/20. On lightly trafficked roads, segregated cycle facilities are not necessary if motor traffic speeds and volumes are low. Many urban roads in Brighton & Hove have a 20mph speed limit.

1.30. Figure 8 shows the current cycle network. Provision is good on the A259 seafront road, sections of the A23, the A270 Lewes Road, and some other major thoroughfares. Brighton's Local Cycling and Walking Infrastructure Plan (LCWIP) sets out the priorities for future improvements with 12 priority routes identified for future upgrades.



Figure 8. Cycle Network Map within Brighton & Hove

Rail infrastructure overview

1.31. Brighton's rail infrastructure consists of the Brighton Mainline, east and west Coastways. The Brighton Mainline connects to London and beyond. The East Coastway line connects the city to Lewes, Eastbourne, Hastings and Ashford in Kent. The West Coastway line connects the city to Chichester, Portsmouth and Southampton. Brighton station acts as a terminal point for all three lines meaning journeys east/west along the coast must interchange here. Figure 9 below shows these lines along with locations north of London that can be directly reached on Thameslink cross London services.

1.32. The council has no direct control over rail infrastructure or services in the city. The city's 8 rail stations, highlighted in Figure 10, are currently all operated by Govia Thameslink Railway, the train operating company that holds the contract to run rail services in our area. However, central government plans to nationalise all rail services by 2027.



Figure 9. Rail Network connected with the Brighton & Hove area, with though London services highlighted in purple.

1.33. A forthcoming Railways Bill will create Great British Railways, which will be responsible for both the train services and the rail infrastructure currently managed by Network Rail. Network Rail have been responsible for planning improvements to the rail network on behalf of the DfT. They organise the rail network into 14 routes, with the Sussex Route encompassing the Brighton Main Line and its associated branches. Network Rail has undertaken studies to explore what future enhancements to the rail network are feasible[6]. The DfT ultimately sets the priorities for rail infrastructure improvements, meaning the council must lobby the DfT for infrastructure improvements or any desired service changes.

[6] Sussex Area Route Study, 2015, for Brighton Mainline
West Sussex Connectivity: Modular Strategic Study, 2020, for West Coastway line
East Sussex Coast & Marshlink Strategic Study, 2025



Figure 10. Detailed rail network map in the South East, with Stations within Brighton & Hove highlighted in the red box

Port infrastructure

1.34. The western end of Shoreham Harbour is within the council's administrative area. The majority of the port lies within the neighbouring authorities of West Sussex County Council and Adur District Council.

1.35. The council is working in partnership with Adur & Worthing Council, West Sussex County Council, and Shoreham Port Authority on a joint project to regenerate Shoreham Harbour and the surrounding areas. The vision is that by 2031, Shoreham Harbour will be transformed into a vibrant, thriving waterfront destination made up of a series of sustainable, mixed-use developments alongside a consolidated and enhanced Shoreham Port, which will continue to play a vital role in the local economy.

1.36. The Shoreham Port Industrial Cluster has been successful in its application to the Local Industrial Decarbonisation Plans competition. This funding will allow businesses and partners to work together on plans to reduce emissions, learn from each other, and also have access to technical advisors to prepare for adopting measures such as using hydrogen or carbon capture.

Digital infrastructure

1.37. While not strictly transport infrastructure, internet connectivity and digital infrastructure are included here because of their importance in reducing the need to travel, as they facilitate online shopping and remote working. Our local economy also specialises in the creative, digital, and IT sectors.

1.38. Our City Plan Part 1 outlines how we support the supply and maintenance of efficient digital and telecommunication infrastructure across the city. Installation of full-fibre broadband was planned across the entire city by the company City Fibre, but rollout has been partial to date: Moulsecoomb, Bevendean, Woodingdean, east Brighton, parts of Hanover, and Elm Grove have been completed. Additional areas are expected to be completed, but timing information is unavailable.

1.40. Transport infrastructure performance

Roads & pavements

1.41. To assess the performance of our roads and pavements, we have considered their physical condition, data on journey times, and surveys of public satisfaction. The physical condition is assessed from inspections and surveys we have commissioned[7]. The DfT compiles traffic delay data[8] which compares an estimate of free-flowing traffic speed against reported travel times. Public satisfaction is gauged using the National Highways & Transport (NHT) public satisfaction survey[9].

1.42. Figure 11 below shows the location of the automatic traffic count sites that the council maintains. These are located on the MRN across the city. The annual average daily flows recorded at these sites show that traffic volumes are generally lower than 10 years ago, with only one site recording higher volumes of traffic[10]. The DfT also estimate the volume of traffic kilometres per local authority based on their own count sites[11].

1.43. The DfT records date back to 1993 and show that the number of vehicle kilometres travelled in Brighton & Hove rose steadily from 1,205 million to the highest they have ever been in 2002; a peak of 1,361 million vehicle kilometres (vkm). Traffic then declined until it reached 1,228 million vkm in 2010. The trend from 2010 to 2019 was rising, with 1,289 million vkm recorded in 2019. The pandemic saw traffic volumes drop sharply in 2020 to 1,022 vkm. By 2022 traffic volumes had risen to 1,203 million vkm and by 2024 there were 1,222 million vkm recorded. While rising, the level of traffic in 2024 was among the lowest recorded in the past 30 years. It remains to be seen if the reduction in travel, observed after the pandemic, will be a long-lasting change.

[7] Carriageway & Footway Condition Modelling Report 2023, XAIS Asset Management
[8] Local A Roads Speed and Delay & data tables
[9] NHT 2024 public satisfaction survey
[10] Brighton & Hove City Council Traffic count sites
[11] DfT Road Traffic estimates by local authority & data tables

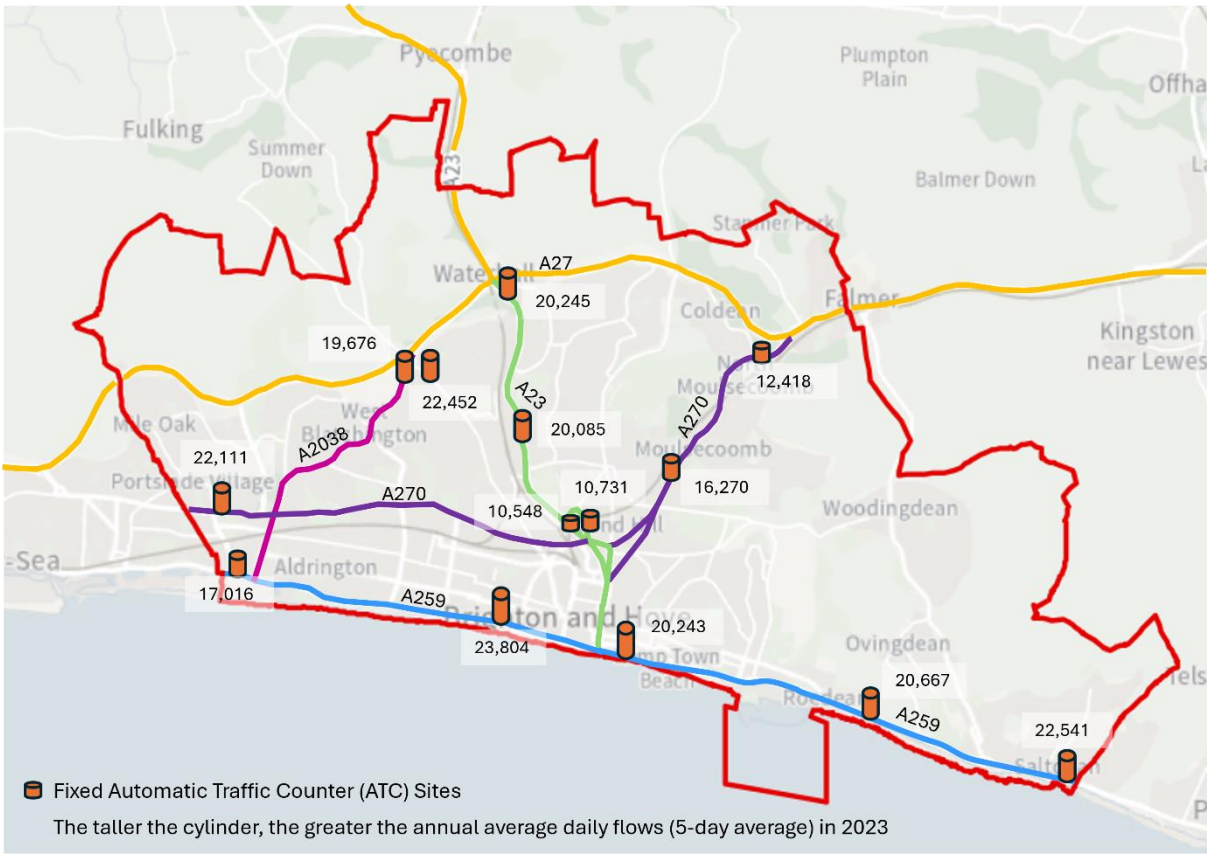


Figure 11. Annual average daily traffic flows within Brighton and Hove based on the Fixed Automatic Traffic Counters

1.44. Like other local authorities the dedicated budget we receive from central government for roads and footway maintenance has been insufficient in recent years, and the condition of these assets has been worsening. The 2023/24 budget for planned maintenance of our roads was £2.9 million, with an additional £400,000 allocated for footway maintenance. Condition surveys show that there is a maintenance backlog of £57 million on our roads and £37.3 million on our footways[7]. While the 2025/26 budget saw a significant increase in grant funding for maintenance, to £5.3m, additional funds are required to tackle the backlog of work.

1.45. To use our limited maintenance budget effectively, the council currently delivers a 'seek and fix' footway maintenance programme. Our highway inspectors identify footways where there are clusters of defects and areas nearing defect status and prioritise these areas for resurfacing. In addition to planned repair work, circa £680,000 is spent on reactive carriageway maintenance (pothole repairs) and £450,000 on reactive footway maintenance each year to repair defects that pose a hazard to users.

1.46. We currently lack data on how much of our footway network meets minimum width standards, but we are aware of many examples where this is not achieved, particularly in older parts of the city. DfT guidance on Inclusive Mobility states that a footway width of 2m is the minimum that should be provided. If this is not feasible due to physical constraints, then a minimum of 1.5m could be regarded as the minimum acceptable under most circumstances. Where there is an obstacle, such as a lamp column or tree, the absolute minimum width should be 1m, with the maximum length of this restricted area being 6m.

1.47. DfT travel data[8], reproduced in Figure 12 and Figure 13 below, show that the average delay on Brighton & Hove's local A roads is among the highest of any local authority outside of London, with roads in other urban areas on the south coast performing better. In 2023, the average delay in Brighton & Hove was 111 seconds per vehicle per mile (spvpm). This compares with the inner London average of 160 spvpm, Southampton's 102 spvpm, Portsmouth's 76 spvpm, and Bournemouth, Christchurch & Poole's 64 spvpm[12]. DfT data for travel time on local A roads is only available from 2020 onwards so trends pre-pandemic are not available.

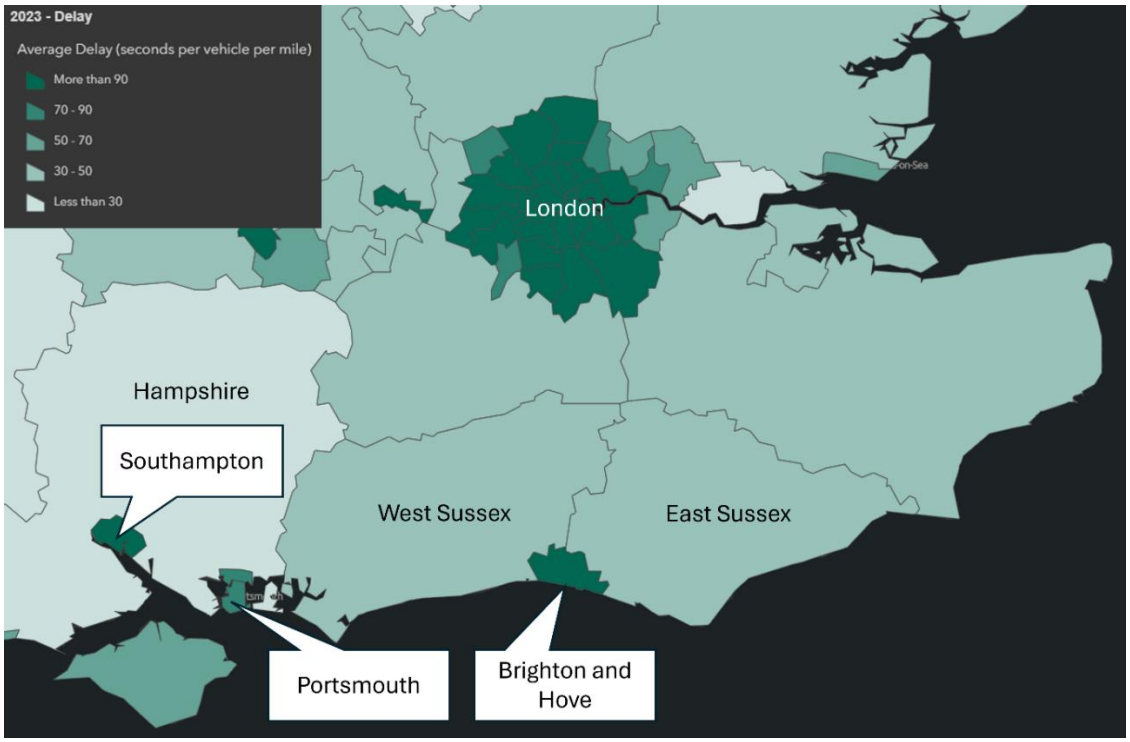


Figure 12. Average delay on Brighton & Hove's local A roads. Source: DfT

1.48. As could be expected, delays in rural areas are lower than in urban areas. East Sussex and West Sussex both experience much lower average delays of between 30–40 spvpm on their local A roads. The DfT data also allows us to compare the performance of individual roads. Figure 13 shows average delays on both the SRN, which is managed by National Highways, and the 7 local A roads that the DfT monitor, which Brighton & Hove is responsible for.

1.49. In the vicinity of Brighton & Hove, the SRN comprises the A27 and A23, both of which are multi-lane dual carriageways that generally perform well with low average delays. However, as a city with a high number of visitors, there can be delays on these roads at particularly busy times. The only routine issue on the SRN is with minor delays on the eastern section of the A27, from the junction with the A270 at Falmer. This delay is likely to be caused by a bottleneck at the junction.

1.50. Figure 13 illustrates how delays increase significantly as traffic transfers from the higher capacity SRN to the local A road network, which is generally single lane and therefore has lower capacity. Delays tend to be worse closer to the city centre. The most severe delays exceeding 200 spvpm occur on:

[12] Average Speed and delay on local A roads 2023 (Table CGN05). DfT.

- A2023 between the seafront and Old Shoreham Road
- A2010 between the seafront and Seven Dials
- A23, London Road, between St Peter's Church and Preston Circus.
- A270, Upper Lewes Road and viaduct Road, between Preston Circus and Vogue Gyratory

1.51. In the built-up area, there is no available land for increasing road capacity without demolishing existing buildings. Instead, our approach is to increase the efficiency with which our existing road space is used, with buses and cycles being the most efficient modes of transport for moving people short distances in an urban area[13].

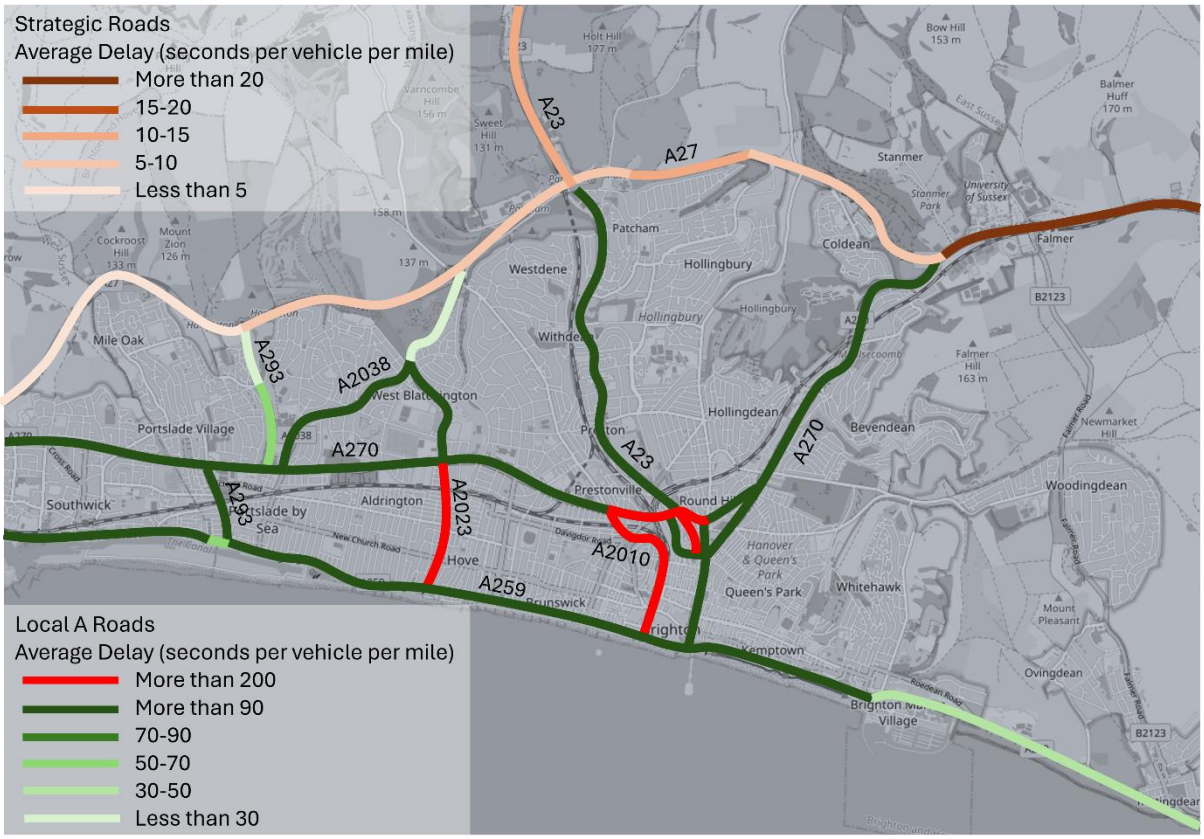


Figure 13. Detailed map with an average delay of SRN and Local A Roads within Brighton & Hove across 24 hours by Link

1.52. The council participates in the NHT public satisfaction survey[9], which provides feedback on the public's perception of how local authorities are managing their transport assets. In 2023 111 local authorities took part, and these results are used to create a national average score against which we can benchmark our performance. This report includes tables showing the council's score along with a colour indicating how well we performed against relative to other local authorities.

Colour indicating the council's performance is in the top quartile, 1% - 25%
Colour indicating the council's performance is in the second quartile, 26% - 50%
Colour indicating the council's performance is in the third quartile, 51% - 75%
Colour indicating the council's performance is in the bottom quartile, 76% - 100%

[13] Getting Cities Moving, National Infrastructure Commission, 2022

1.53. Table 2 shows selected indicators related to roads and pavements that are managed by the council. Satisfaction with the condition of pavements and roads is low nationally. In the past 5 years, the council has generally been perceived as performing above the national average, but in the most recent 2023 survey, the results fell below average. There is a perception that there is a particularly acute issue with weeds on pavements and delays in repairs where needed.

Indicator	National Average	the council	Gap
Condition of highways	27%	24%	-3%
Number of potholes	14%	11%	-3%
Weed killing on pavements	39%	28%	-11%
Action to repair local roads	27%	19%	-8%

Table 2. Public Satisfaction of Selected Indicators Related to Roads and Pavements

1.54. In 2019, the council moved to a maintenance schedule that relied on manual weeding, but in May 2024 introduced a controlled-droplet application of glyphosate, which is more targeted and sustainable than previous methods of glyphosate application. It is expected that this will improve outcomes by keeping the pavements weed-free and mitigating environmental risks.

Other public paths performance

1.55. The council manages a 159km countryside network comprising footpaths, bridleways, restricted byways and byways open to all traffic shown in Figure 14. The network includes 155 gates, 312 waymarks and 26 stiles.

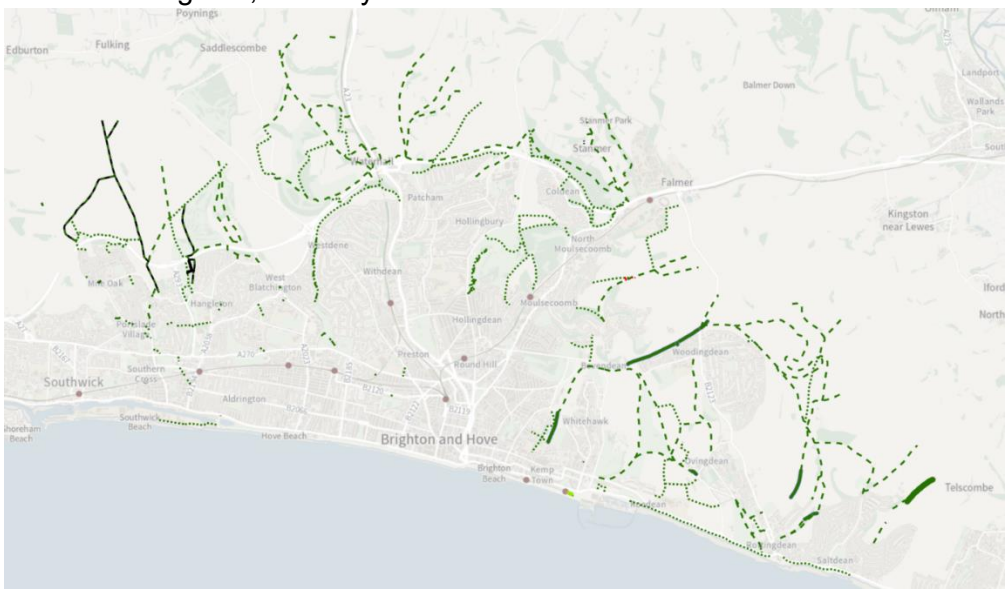


Figure 14. Public Rights of Way Network

1.56. In early 2026 the results of an updated Public Rights of Way Asset Survey will be available. At the time of compiling this evidence base 47% of footpaths, 78% of bridleways and 100% of byways open to all traffic had been surveyed. Among these, 81% of footpaths, 69% of bridleway and 63% of byways open to all traffic are reported to be in good condition. Moreover, 15% of gates require repairs while 14% need to be replaced. Furthermore, 32% of waymarks are either missing or in need of repair and 17% of stiles require repairs.

1.57. The performance of the paths that make up the public rights of way network is best gauged through the NHT public satisfaction survey. Overall, the performance of the public rights of way network presented in Table 3 is perceived as being above the national average, with the main issue being overgrown footpaths.

Indicator	National Average	The council	Gap
Condition of rights of way	52%	57%	5%
Ease of use by those with disabilities	42%	46%	4%
Information on rights of way	46%	50%	4%
Overgrown footpaths and bridleways	37%	36%	-1%
Rights of way overall	54%	55%	1%

Table 3. Public Satisfaction of Selected Indicators Related to Public Rights of Way

1.58. With an annual maintenance budget of approximately £24,000, a prioritisation method is in place to ensure effective planning. Maintenance focuses on paths and assets that fail to meet statutory requirements or pose significant risks of injury or damage, which are therefore given higher priority.

Bus infrastructure performance

1.59. Bus use in Brighton & Hove is high compared to other UK cities[14]. The number of bus journeys per head of population is the second highest in the UK, with only London having more. Figure 15 shows the annual number of journeys made by bus in Brighton and Hove over the past decade.

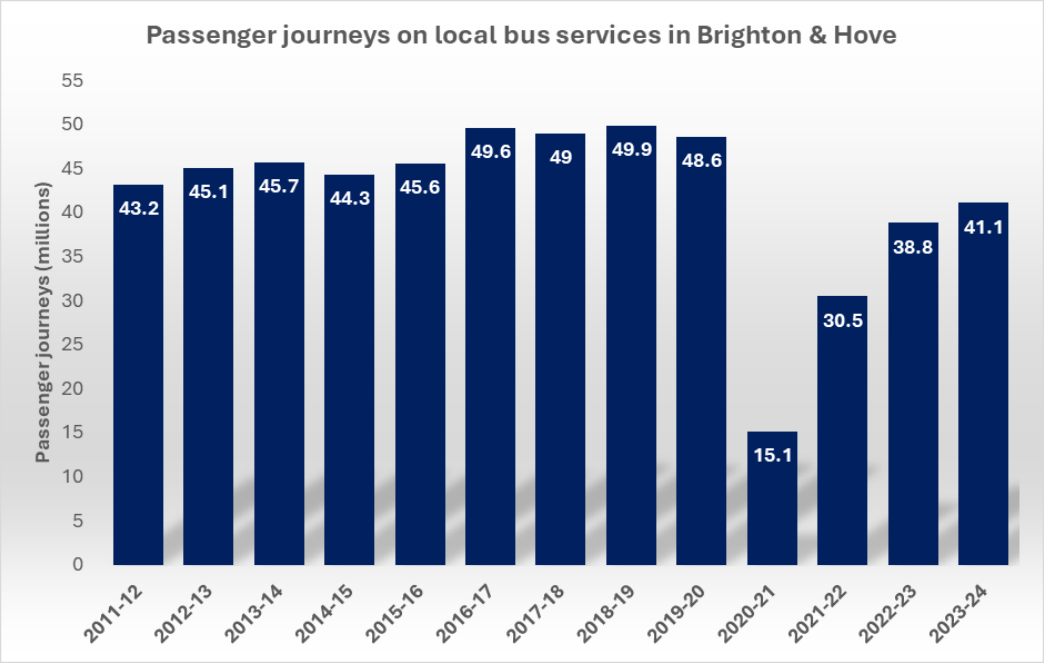


Figure 15. Number of Bus Journeys on Brighton & Hove Bus Services

1.60. While usage is recovering from the lows seen during the Covid pandemic, in the year ending March 2024, there were just over 41 million trips by bus. This is significantly

[14] Local bus passenger journeys (table BUS01), DfT statistics.

lower than in 2019, pre-pandemic, when the number of annual journeys was close to 50 million.

1.61. To aid the recovery of bus travel, the council has published a BSIP, which was refreshed in 2025[15]. Funds are used for a mix of fare subsidies and bus infrastructure designed to improve bus journey times. For bus travel to be attractive, it needs to be affordable and provide competitive journey times compared to car travel. The council provided approximately £1.14 million in 2024/25 in funding for supported bus services, including services to the South Downs National Park, communities not served by the commercial bus network and school buses.

1.62. The DfT publishes data on what percentage of non-frequent services run on time and the average excess waiting time for frequent services. However, data on frequent services' excess wait time is largely incomplete, with no data available for the council's area. The punctuality of non-frequent services in the city is broadly in line, although slightly below, the English and Southeast regional average[16].

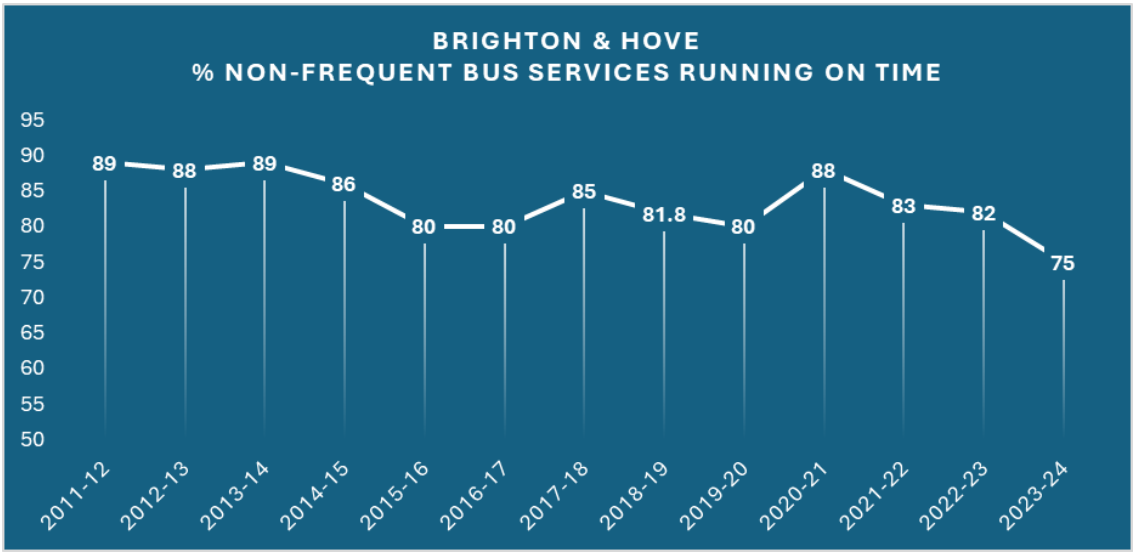


Figure 16. Percentage of Non-frequent Bus Services Running on Time in Brighton & Hove

1.63. Punctuality figures for Brighton & Hove Buses, representing most bus services in the city, reduced from 85.5% between April 2014 and March 2015 to 80.4% for 2019-2020. In 2020-2021, which includes the Covid-19 lockdowns, the figure improved to 87.6%. However, the punctuality decreased again in 2023/24. We have also engaged with Brighton & Hove Buses to understand long term trends in scheduled journey times of bus routes. The trend has been for increased journey times on the majority of routes. Between 2008-16 there was an average increase of 12% on journey times. Between 2016-2025 there was a further 11% average increase in route journey times.

1.64. There are likely to be varied causes for the rise in bus journey times. As seen in Figure 15 bus ridership was rising until the pandemic and passenger volumes will affect journey times, particularly on high-frequency urban services, where boarding and alighting rates are high. Other possible causes include roadworks, road space

[15] Concessionary Fares and BSIP update, Brighton & Hove City Council cabinet report, 2025
[16] Local bus passenger journeys (table BUS09) DfT statistics

reallocation, signal phase changes, and more stringent driver safety margins built into schedules to maintain reliability. However, traffic congestion is often an important factor in bus journey times.

1.65. Through our enhanced bus partnership we will work with bus operators to identify bus priority measures to reduce bus journey times. BSIP projects include schemes at Dyke Road/Upper North Street, A259 Marine Parade, and A23 North (Patcham). The BSIP target is to increase the punctuality of bus services to 95% and a 10% reduction in journey times by 2030, using 2018/19 as a baseline.

1.66. The public perception of the local bus services is very good. In the NHT public satisfaction survey, all but one of the 28 questions about buses scored a response in the top quartile. The only area where satisfaction fell below the national average was the issue of bus fares. Selected questions are shown in Table 4.

Indicator	National Average	The council	Gap
Frequency of bus service	51%	72%	21%
Number of bus stops	64%	79%	15%
Whether buses arrive on time	48%	60%	12%
Bus fares	54%	52%	-2%
Local bus service overall	54%	71%	17%

Table 4. Public Satisfaction of Selected Indicators Related to Bus Service

1.67. The council has undertaken an analysis of how well served neighbourhoods across the city are by bus services as part of the BSIP 2025 Refresh[17]. This study has identified areas with lower bus accessibility and priority areas for action. Prioritisation was based on how accessible areas are, the number of deprived households and/or full-time student population, and the potential for modal shift based on accessibility and car availability.

1.68. Mile Oak, Coldean & Falmer, Woodingdean, Bevendean, and Saltdean were identified as lower accessibility areas, meaning residents in these areas are reliant on public transport and will travel for longer to access employment or key services such as schools, GPs, and so on. Figure 17 sets out areas with the lowest accessibility by time period[18].

[17] 2025 BSIP Refresh
[18] Source: Jacob's BSIP Accessibility Study for Brighton & Hove City Council. 2024

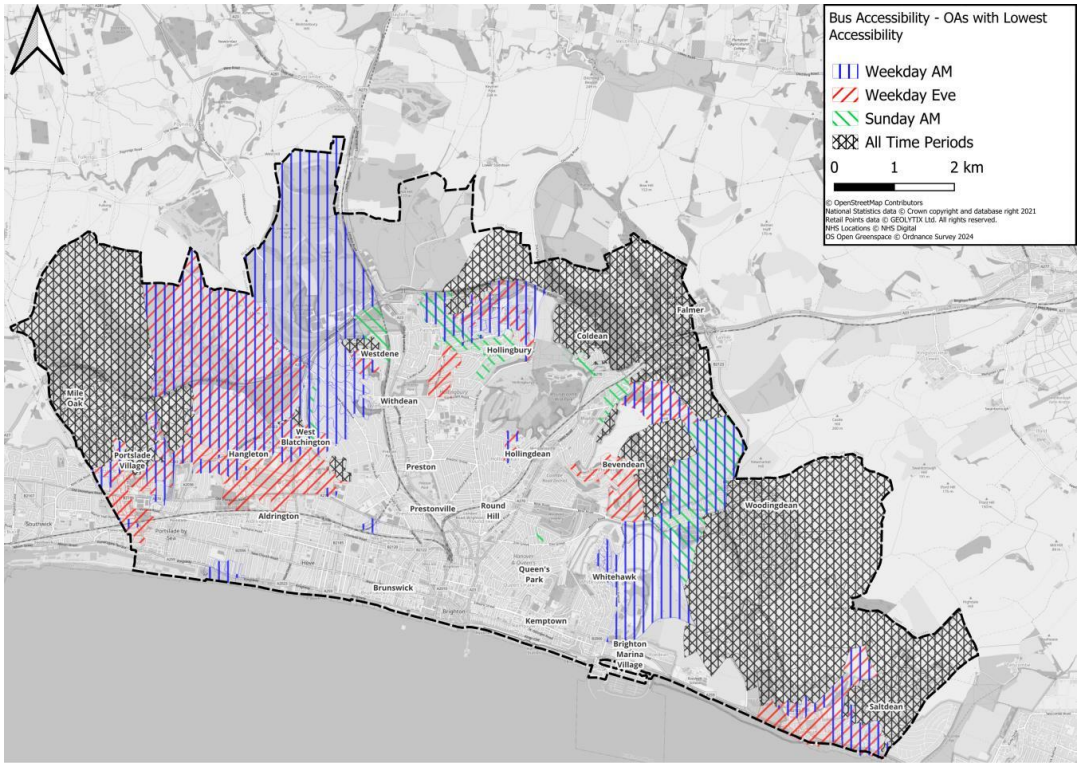


Figure 17. Lower Accessibility areas across all three tested time periods in 2024

1.69. Mile Oak, Coldean & Falmer, East Bevendean, and East Woodingdean were identified as the highest priority for local need (see Figure 18), while Mile Oak, Portslade, West Blatchington, Woodindean, Ovingdean, and Saltdean were determined as high potential for modal shift (see Figure 19).

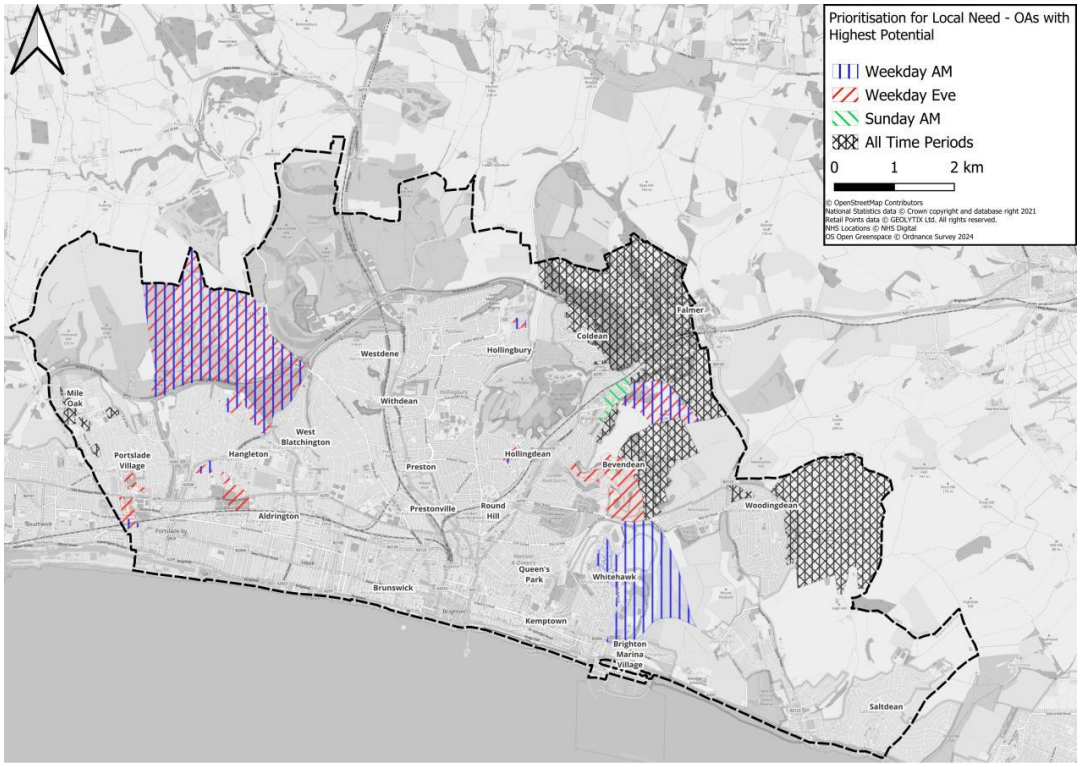


Figure 18. Highest Priority for Local Need across all three tested time periods in 2024[18]

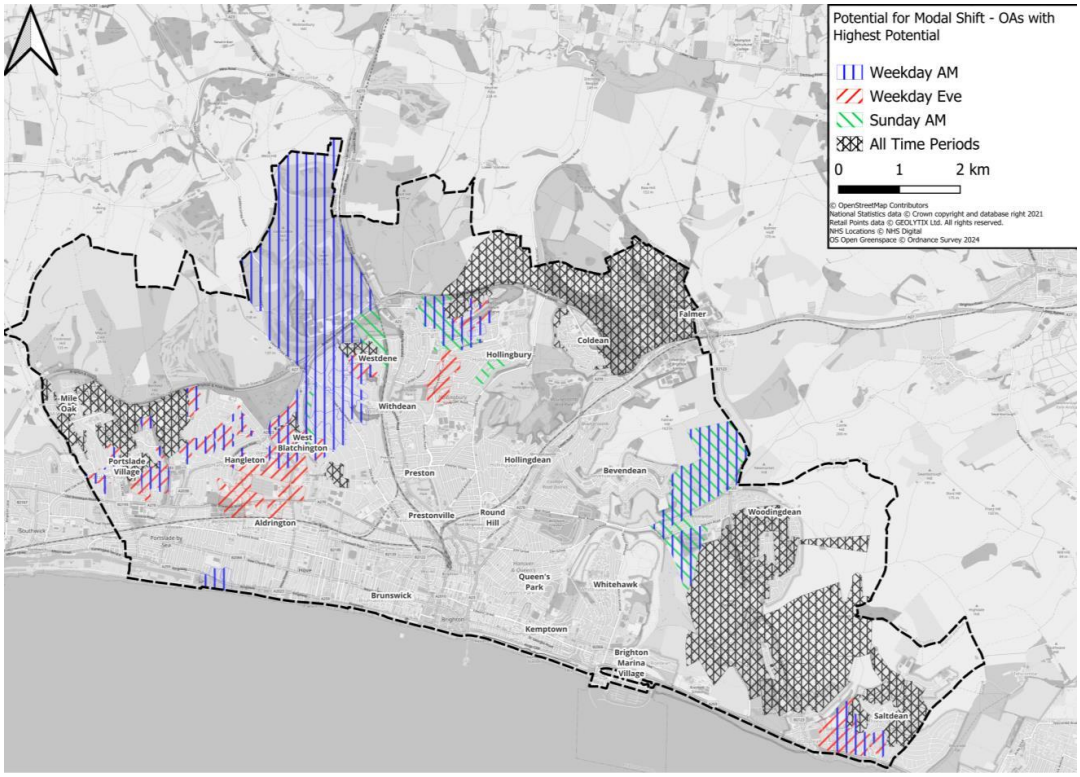


Figure 19. High Potential for Modal Shift across all three tested time periods in 2024[18]

1.70. Some high-level improvements were suggested in the report to provide the greatest social benefit. Regarding local need, bus priority measures on Church Road or Western Road could benefit Mile Oak residents using the 1X route, as well as benefit parallel routes. A service connecting the area to Hangleton or Old Shoreham Road during the evening and Sunday morning periods could also be beneficial. Bus priority measures on Lewes Road between Coldean and Moulsecoomb would likely reduce bus journey times, which could benefit Coldean & Falmer residents.

1.71. To offer the highest potential for modal shift to bus, localised information campaigns, particularly delivered alongside any service improvements or fare offers, were proposed for all areas of focus. More localised proposals include providing an express route to central Brighton to benefit Downs Park/ Hangleton residents and bus priority measures on the A259 to benefit Saltdean residents and other services.

Cycle infrastructure performance

1.72. The number of people choosing to cycle is probably the best indicator of how well our cycling infrastructure is performing. Trends on the number of people choosing to cycle is difficult to judge with the information available to us. Since 2020, we have been carrying out dedicated cycle counts at 15 locations across the city. However, 2020 is not a good year to use as a baseline because across the UK, there was an increase in cycling trips, stages, and miles travelled during 2020 associated with the pandemic. By 2023, the average number of trips and stages have returned to similar levels seen in 2019[19].

1.73. Taken as a whole, the 15 count sites reflect this UK wide trend, with cycling having declined slightly from 2020 to 2023 in Brighton & Hove. The exception to this is the two

[19] DfT statistical release, walking & cycling Aug 2024

count sites located on the Old Shoreham Road, where there is a segregated cycle facility, which both recorded an increase in cycle trips over the period.

1.74. The 2021 census data, which asks how people travel to work, is also affected by the pandemic, with a far greater increase in home working and a decline in other modes. It cannot be usefully compared to 2011 to see what trends there are across the city. The census data does show us which areas of the city have higher rates of cycling for trips to work, with the Round Hill area of Brighton and much of Hove seeing cycling to work at rates of 7-10%. The LCWIP document sets out in greater detail an analysis of cycling across the city.

1.75. Since 2016 the DfT have annually surveyed people as to their walking and cycling habits[20]. This reveals how frequently people walk and cycle for either travel or leisure purposes. The rates of cycling in Brighton & Hove are much higher than the UK average. This is true for both regular (3 or more times a week) and infrequent (once a month) cyclists. For example in 2016, 16.3% of Brighton & Hove residents cycled once a week for travel purposes compared with 6.3% for England.

1.76. The trend since 2016 has been downward in both Brighton & Hove and England. In 2023 only 11.4% of Brighton & Hove residents cycled once a week for travel compared with 5.4% in England. The fact that Brighton & Hove's results mirror those at the national level suggest that the decline in cycling is not primarily due to local factors.

Rail infrastructure performance

1.77. The long-term trend over the past 25 years has been increasing usage of the rail network, although growth has been slower in the past decade. Figure 20, showing entries and exits for the 8 stations in the Brighton & Hove area, is consistent with nationwide trends brought about by the pandemic. Patronage of the rail network is still significantly lower than pre-pandemic levels.

1.78. In Brighton & Hove, immediately prior to the pandemic, there were 24 million entries and exits through the city's 8 train stations. This sank to less than 6 million at the height of the travel restrictions imposed during the pandemic, and in 2022/23, this had recovered to just over 19 million, which is 21% fewer trips than in 2019/20.

[20] DfT National Travel Survey and Active Lives Survey

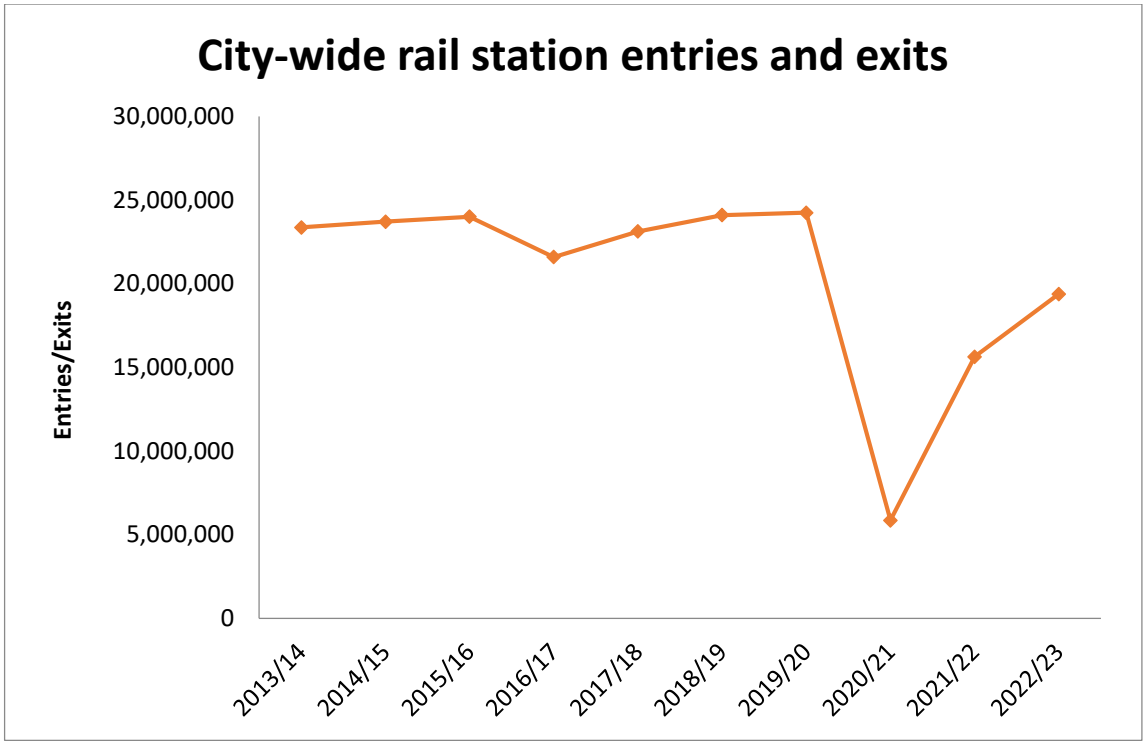


Figure 20. Graph showing combined entry and exit figures for the 8 Brighton & Hove stations. Note that figures for 2016/17 were affected by industrial action.

1.79. Approximately 27,000 rail passengers arrived at Brighton station on a typical weekday in 2023[21]. Immediately prior to Covid, this figure would have been around 33,000. In the morning peak, between 7am and 10am, just under 6,000 people arrived, whereas before the pandemic, it would have been around 8,000.

1.80. Govia Thameslink has reported a strong bounce back in leisure travel post-pandemic, with weekend travel now higher than pre-Covid. Journeys to Brighton are now busier on Saturdays than on weekdays[22]. However, commuter travel has returned in smaller numbers as businesses find more efficient ways of working with less travel, for example, working from home and hybrid working.

1.81. Rail services have responded to the new travel patterns with fewer services arriving and departing the city. In 2019, there were 360 train services arriving and departing the city, but by 2023, this had reduced to around 270 services. The decline in the rail capacity serving the city is much less pronounced. In terms of seated capacity, there were an average of 118,000 arriving in the city in the three years prior to the pandemic, compared with 102,000 in 2023.

1.82. Before the pandemic, passenger crowding and comfort in the morning and afternoon peaks were major issues, but this is no longer the case with lower passenger numbers. The percentage of passenger crowding in Brighton was recorded at zero from 2020 to 2023, indicating that the number of passengers remained lower than the capacity.

[21] Rail passenger numbers and crowding on weekdays (RAI02)
[22] DfT Statistical release, Sep 2024

1.83. National Rail publishes data on train punctuality by station, although this is most conveniently viewed on the 'On time trains' website[23]. In general, Brighton & Hove stations are in line with the UK average performance for cancelled and delayed trains with the exception of Preston Park, which in 2023 suffered from a high number of cancellations and late trains (see Figure 21). Stations on the West Coastway, Falmer, Moulsecoomb and London Road generally had better performance than elsewhere.

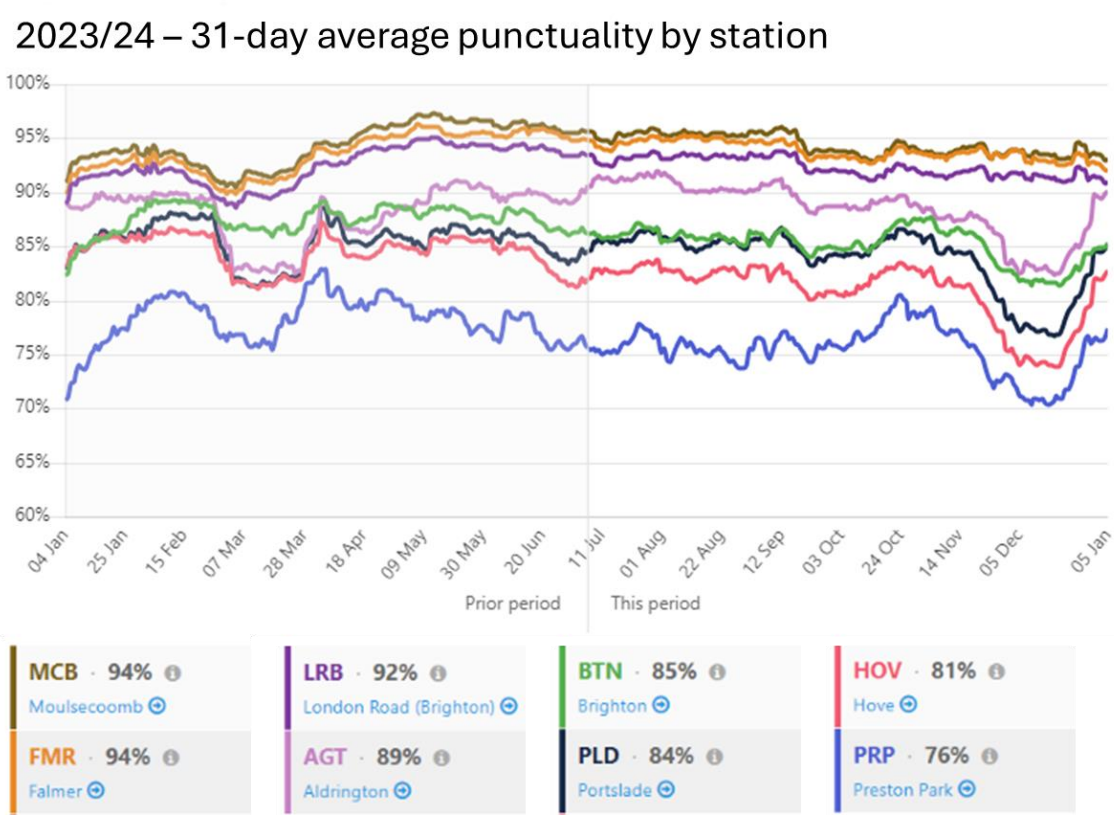


Figure 21. 31-day average punctuality performance. Reproduced with permission from OnTimeTrains.

1.84. Transport infrastructure impacts

1.79. The transport network brings clear benefits, increasing accessibility, connecting people and facilitating trade. However, it also has negative impacts, the most significant of which are:

- greenhouse gas (GHG) emissions
- air pollution
- noise pollution
- casualties

1.80. Section 3 of this document covers GHG emissions from the transport network.

Air Pollution

1.81. Poor air quality is the largest environmental risk to public health in the UK[24]. Legal limits are in place, which set the maximum allowed concentrations for several air

[23] On Time Trains
[24] Public Health England, Estimating local mortality burdens associated with particulate air pollution

pollutants. Most measured pollutants in the UK are under the legal limit. However, the two pollutants of most concern, and which have breached legal limits in many urban areas, are particulate matter (PM) and Nitrogen Dioxide (NO_2).

1.82. PM refers to any pollutant in the air which is not a gas. PM is classified according to size, with PM10 referring to particulates less than 10 micrometres in diameter and PM2.5 those less than 2.5 micrometres in diameter. For reference, a human hair is about 60 micrometres wide. PM10 is small enough to enter the lungs. Road traffic is a major source of both PM and NO_2 pollutants.

1.83. Long-term exposure to lower concentrations of pollutants and short-term exposure to higher levels of pollution are both damaging to people's health. For this reason, legal limits for air quality standards are set for both scenarios. Concentrations of PM and NO_2 are measured in micrograms per cubic meter, µg/m3.

1.84. Table *5* shows the current legal limits.

	Current legal limits		
Pollutant	**PM10**	**PM2.5**	**NO_2**
Annual average	40 µg/m3	20 µg/m3	40 µg/m3
24-hour average	*50 µg/m3	-	-
1-hour average	-	-	**200 µg/m3

Table 5. Legal limits for PM and NO_2. * Note the 24-hour limit cannot be exceeded more than 35 times a year. **The hourly average cannot be exceeded more than 18 times per year.

1.85. In response to exceedances of the legal limit for NO_2, the council declared two Air Quality Management Areas (AQMA) in 2013. We are required to undertake enhanced monitoring, publish annual Air Quality Status Reports, and an Air Quality Action Plan setting out what measures we will implement to reduce emissions within legal limits.

1.86. Annual monitoring reports have been published since 2015 with the latest one being the 2024 Report. Over the past decade air quality has steadily improved and the original two AQMAs have been replaced with six smaller ones, shown in Figure 22 below. Road transport is responsible for 80% of NO_2 concentrations at roadside, with diesel vehicles the largest source in local areas of greatest concern[25]. As could be expected all of our AQMA are focused on roads and junctions that carry high volumes of traffic.

[25] DEFRA / DfT, UK plan for tackling roadside nitrogen oxide concentrations, 2017

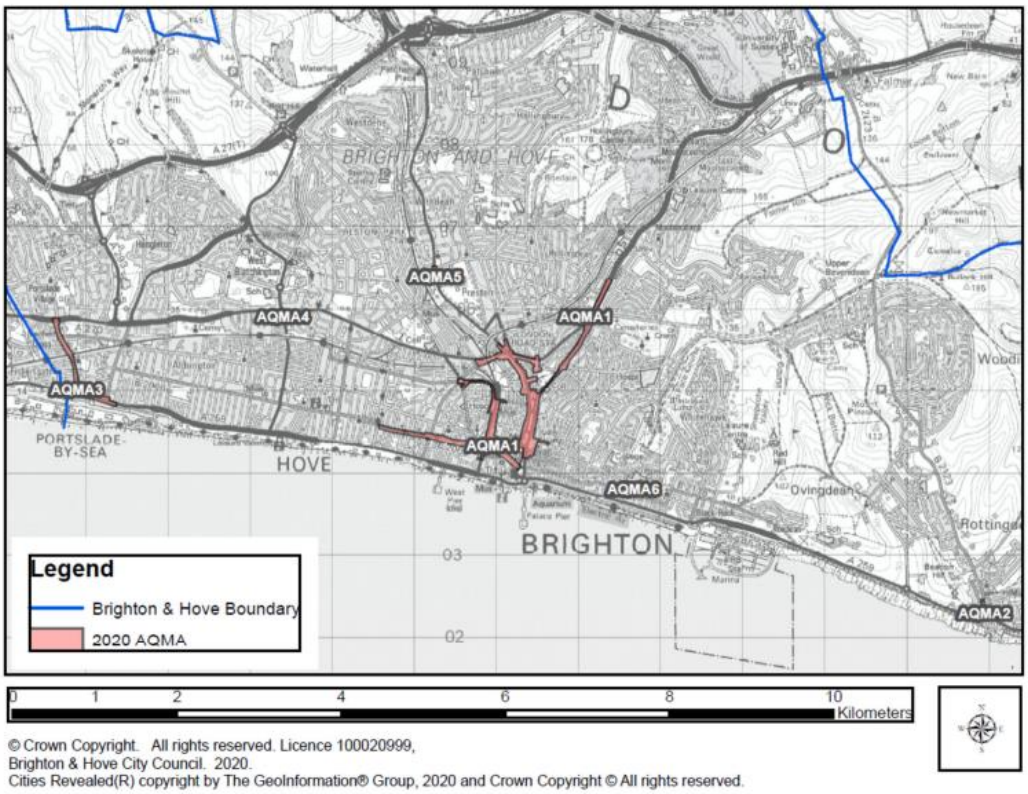


Figure 22. Air Quality Management Areas (AQMA) in 2020

1.87. The council has implemented various actions, including the Brighton & Hove Bus Ultra-low Emission Zone (ULEZ). While the bus ULEZ covers a relatively small area on Western Road and North Street, it captures well over 90% of buses operating in the city. A detailed breakdown of the sources of NO_2 in each AQMA and future actions to reduce NO_2 will be set out in the most recent status reports or AQMA action plan[26].

Noise pollution

1.88. Noise can have a significant impact on our health, with the volume, timing and duration of a sound relevant to its effects on human health. In 2018, the World Health Organisation (WHO) published environmental noise guidelines for the European region, which were based on systematic reviews of the scientific literature. This defined the harmful long-term noise exposure level above which a significant increase in negative health effects occurs as 55 dB (averaged over a 24-hour cycle) or 50 dB (averaged overnight)[27].

1.89. The UK's Environmental Noise Regulations 2006 require that exposure to environmental noise from major sources of road, rail and aircraft in urban areas is determined by noise mapping. Every 5 years, DEFRA publish noise mapping data which illustrates noise impacts associated with the road and rail network[28]. The most recent round 4 noise maps, based on data from 2021, are available to view online[29].

[26] Brighton & Hove City Council air quality webpages
[27] House of Lords, Science and Technology Committee: The neglected pollutants: the effects of artificial light and noise on human health.
[28] DEFRA noise mapping data.
[29] DEFRA, round 4, road noise online map.

Figure 23 shows the Lden noise indicator, which is an amalgamated day-evening-night level of noise based on annual averages.

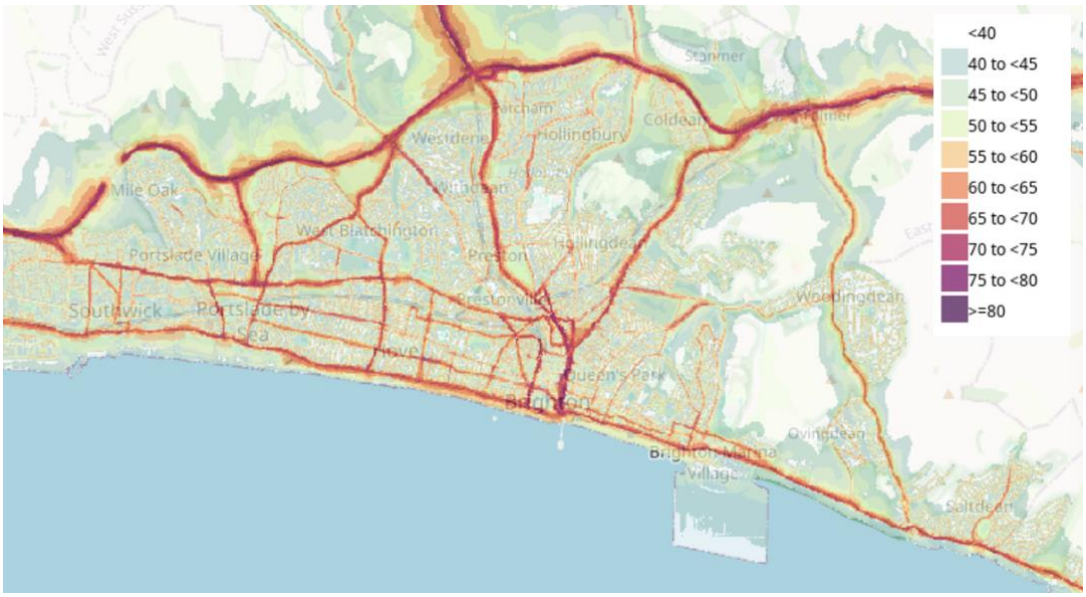


Figure 23. Noise levels in 2021. Source: Road Noise Lden

1.90. Using this data, DEFRA identifies 1% of the population affected by the highest noise levels from roads or railways and designates them Noise Important Areas. In Brighton & Hove, Noise Important Areas have been identified along the A23, from The Level to the seafront sections of Lewes Road, Queens Road, and the A259 seafront road.

1.91. The external noise that a passenger car can emit is a regulated pollutant. The exact noise level allowed is related to the vehicle's type approval. Details are available on the Vehicle Certification Agency website. The current limits, set in 2016, are 72 dB(A) for most cars. In 2026, the limit for most new passenger cars will be reduced to 68 dB(A).

Road casualties

1.92. The council has a record of taking action to reduce casualties on our roads. Safety was the rationale for making many of the city's roads 20mph. An assessment of Brighton & Hove's 20mph limit in 2018[30] concluded that there had been a statistically significant change in collisions and casualties, relative to the 30mph comparator area. The results show a significant reduction in overall collisions (-18%) and overall casualties (-19%).

1.93. However, the number of people killed or seriously injured (KSI) on Brighton and Hove's roads has risen slightly over the past 8 years. In Great Britian over the same period the trend has been for a slight decrease in KSIs. Changes in severity reporting mean that serious injury figures from 2016 onwards are not directly comparable with earlier years.

1.94. In the three-year period 2021 – 2023 there were an annual average of 172 KSIs recorded in Brighton & Hove compared with 161 KSIs over the period 2016-2018. In

[30] 20mph research study - 2018 - Report by Atkins, AECOM, and Professor Mike Maher (UCL)

Great Britain in the three-year period 2021 - 2023, there was an annual average of 28,835 KSIs compared with 31,493 for the period 2016 – 2018. This is illustrated in Figure 24.

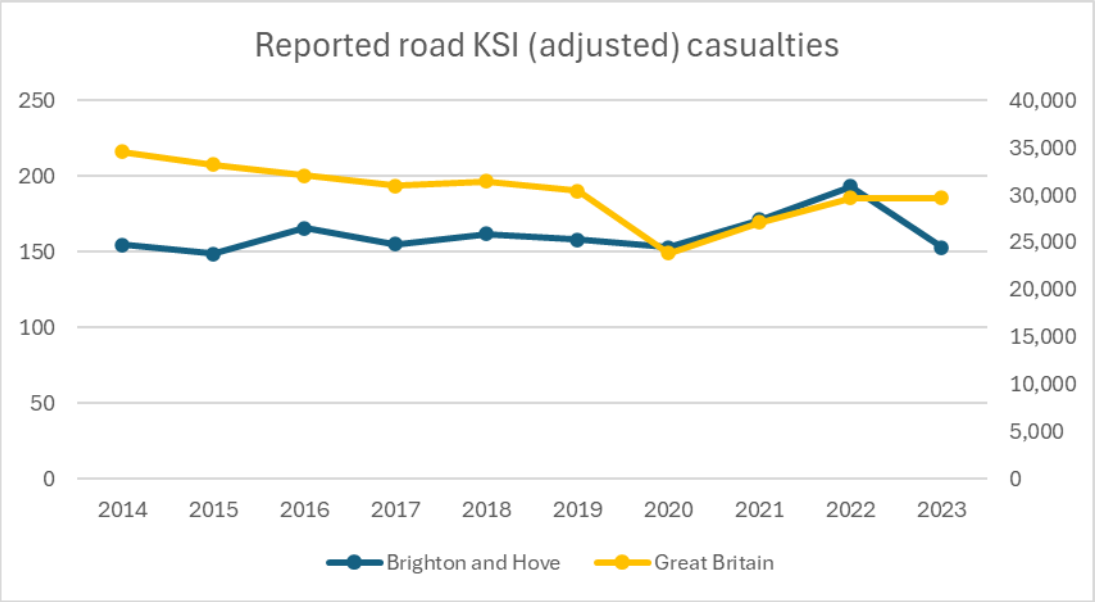


Figure 24. Reported road KSI casualties (source: Road safety statistics)

1.95. The location of traffic collisions over the past five years is shown in Figure 25. These incidents predominantly occurred along the main traffic corridors across the city. However, there is a noticeable concentration of collisions in the centre of the city, likely due to the high footfall and traffic volumes in this area.

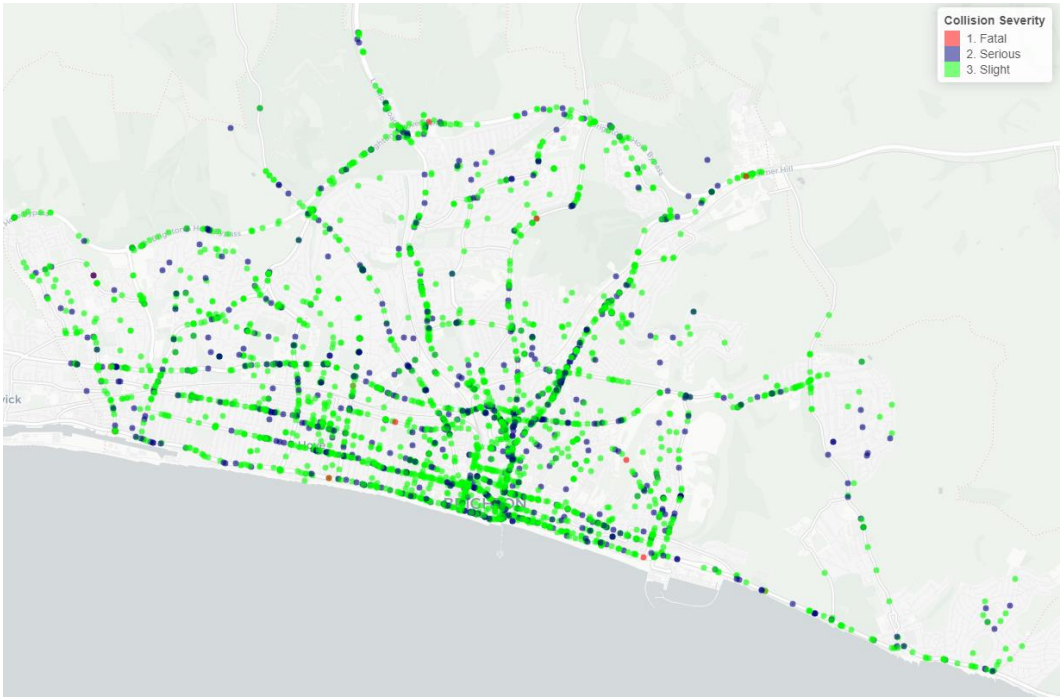


Figure 25. Collision Map in Brighton & Hove between 01/01/2019 and 31/10/2024 [31]

[31] Sussex Safer Roads Partnership Data Portal

1.96. When police officers attend the scene of a collision, they are able to select up to 6 contributory factors, from a list of 78, that they believe contributed to the collision. These contributory factors reflect the reporting officer's opinion at the time of reporting and are not necessarily the result of an extensive investigation. While s u b j

1.97. T The most frequently recorded contributory factors when a collision has resulted in a casualty fall into the categories of 'Driver or rider error or reaction' or 'Behaviour or inexperience'. This includes the specific factors of 'Driver or Rider failed to look properly' and 'Driver or Rider careless, reckless, or in a hurry'. Next on the list of most frequently recorded contributing factors are 'Injudicious action' and 'Impairment or distraction'. All of the above were recorded in 47%-18% of collisions resulting in a casualty in Brighton & Hove in 2023.

1.98. T This suggests that to make the biggest reductions in road casualties, our focus should be on driver behaviour and designing our roads, particularly junctions and crossings, so that driver errors are less likely to result in a casualty. We will develop and publish a Road Safety Action Plan after further analysis of the available data to set out what actions we believe will result in delivering reductions in casualties.

1.99. A A general trend in national casualty statistics is that vulnerable road users – pedestrians, cyclists, and motorcyclists – make up a large proportion of casualties. With Brighton and Hove having higher levels of walking and cycling than the national average[33], we want to ensure that our focus is on making these forms of travel safe. We have analysed pedestrian and cycle casualties to understand what the trend is within Brighton & Hove.

1.100. T The number of pedal cycle KSI casualties has decreased over the past 4 years. From 2015 to 2021, there were between 40-50 casualties a year. In 2022 and 2023, there were under 35 KSIs. The number of annual pedestrian casualties has remained relatively consistent over the past ten years, with an average of around 45 KSI casualties[34].

a

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[32] DfT road safety statistics. Data table RAS07
[33] DfT walking and Cycling statistics, 2024.
[34] Sussex Safer Roads Partnership Data Portal

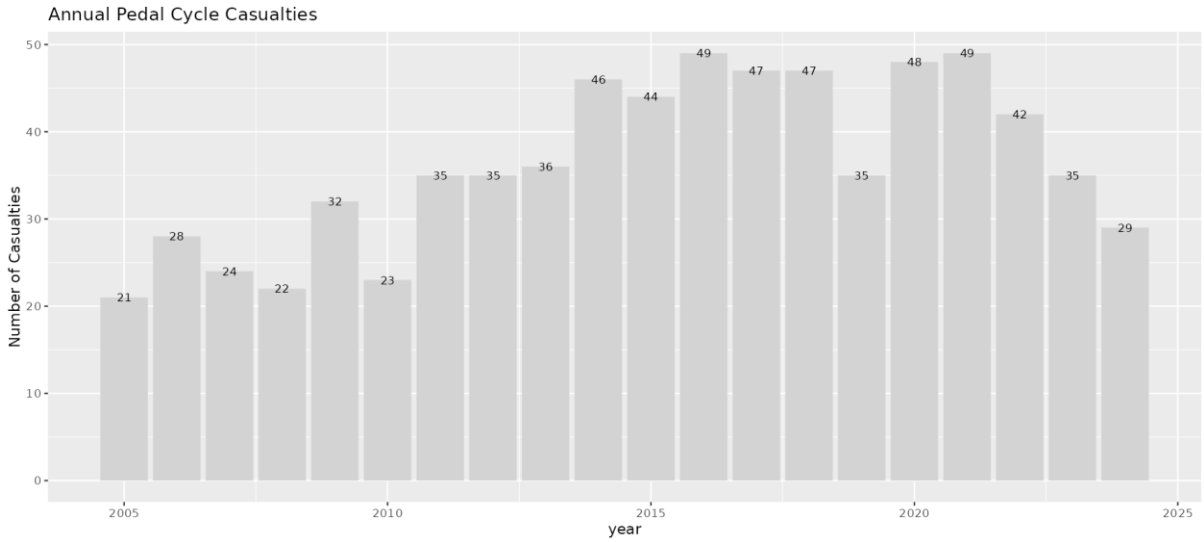


Figure 26. Annual Pedal Cycle KSI up to 2024

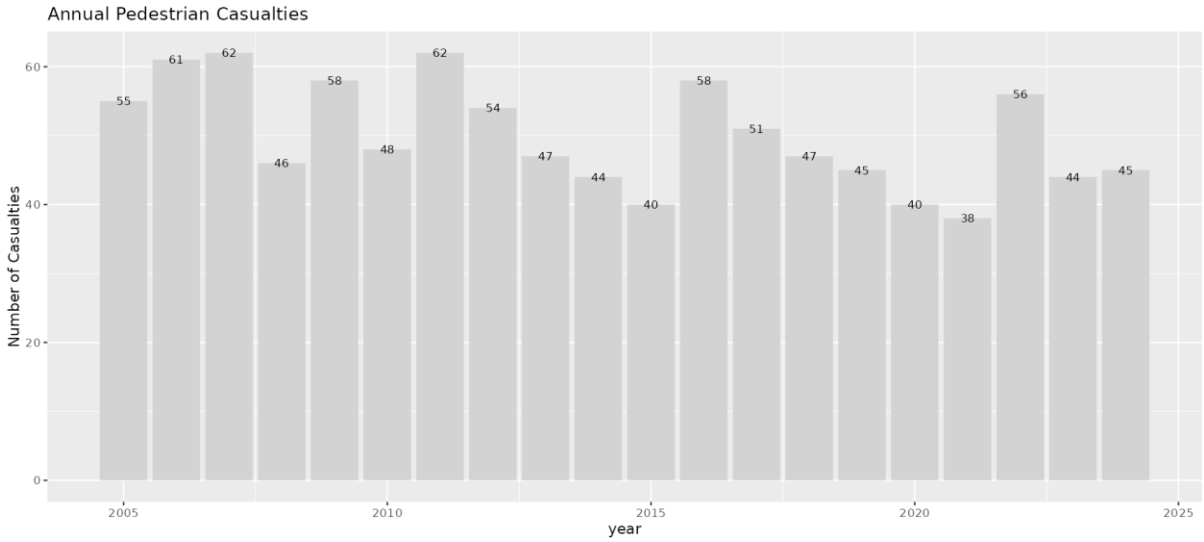


Figure 27. Annual Pedestrian KSI up to October 2024

1.101. A more detailed analysis of road traffic accidents focusing on collisions involving cyclists and pedestrians in Brighton and Hove in the last 5 years (01/01/2019 – 15/10/2024) has been requested from Sussex Safer Roads Partnership for a deeper understanding of any contributory factors of the collisions.

1.102. While fatalities involving cyclists remain relatively low, the severity of injuries tends to be higher than the overall average. Cyclists are more likely to be involved in accidents during peak commuting times both morning and afternoon. Pedestrians in Brighton and Hove are notably more likely to sustain fatal or serious injuries in accidents. The main contributory factors of these collisions are ‘driver/rider error or reaction’. The police also record ‘Pedestrian failure to look’ or ‘in a hurry’ frequently. There may also be under-reporting of slight injuries for these groups.

1.103. To understand the relative risk different motor vehicles pose to cyclists and pedestrians, we analysed the number of collisions resulting in a fatality or serious injury to these vulnerable road users alongside the kilometres travelled by the different vehicle types. Figure 28 and Figure 29 illustrate these findings.

1.104. HGVs are more than twice as likely to be involved in a collision resulting in fatality or serious injury to both cyclists and pedestrians, relative to their kilometres travelled. LGVs also pose a greater threat than cars. The risk of motor vehicles being involved in a serious injury or fatality per vehicle-km is higher for people walking than for those cycling. We do not have accurate figures on how many pedestrian and cycle kilometres are made each year, which would be needed to fully assess the relative risk faced by these modes of travel.

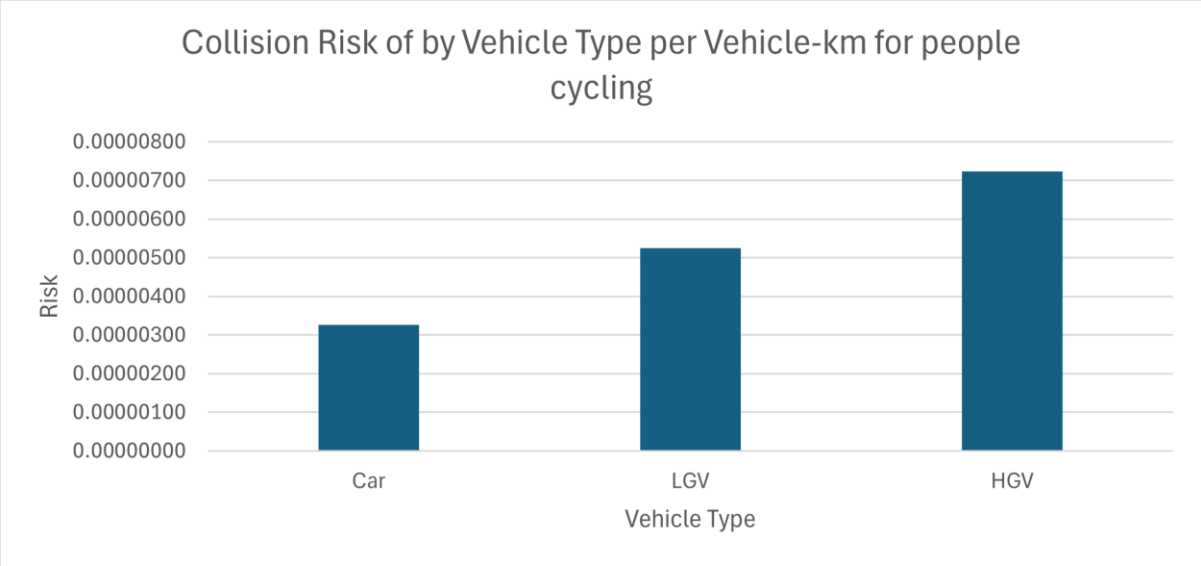


Figure 28. Risk of motor vehicles being involved in fatal or serious injury collisions per vehicle-km for people cycling

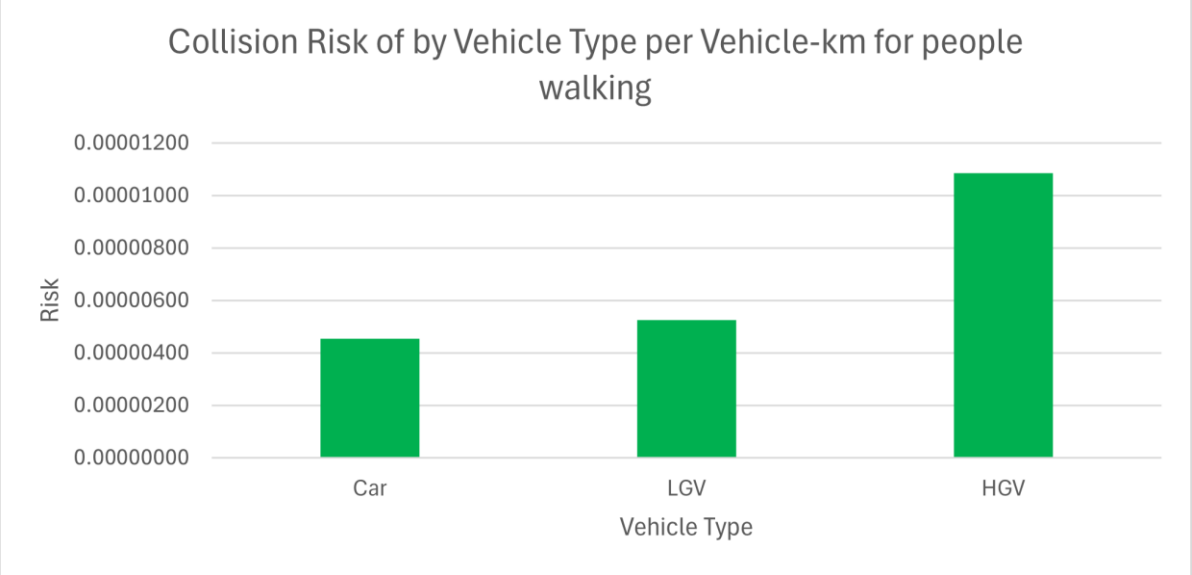


Figure 29. Risk of motor vehicles being involved in fatal or serious injury collisions per vehicle-km for people walking

1.105. Further analysis is required to fully understand how we can reduce collisions and casualties. The draft Our City Transport Plan 2035 makes a commitment to produce a Road Safety Action Plan to focus on how we can reduce casualties.

2. Part 2: Understanding travel in Brighton & Hove

2.1. The previous part of the evidence base focused on the city's transport infrastructure. This part seeks to understand people's reasons for making journeys and the travel choices they make. Brighton & Hove specific data is much scarcer on this topic than on our transport infrastructure. This part is divided into three sections that consider:

- leisure and shopping travel
- commuter travel
- servicing & deliveries

2.2. In the UK, for at least the past 20 years, shopping has generated more trips than any other reason for travelling. The chart below shows the average number of trips according to purpose, based on the 2022 National Travel Survey (NTS)[35]. This is completed by approximately 16,000 individuals in 7,000 English households every year. In 2022, shopping accounted for a quarter of all trips. A further 12% of trips are visiting friends, and a significant number of the 15% of 'other' trips are also likely to include leisure trips. Shopping and leisure are, therefore, the most common reasons for a trip to be made.

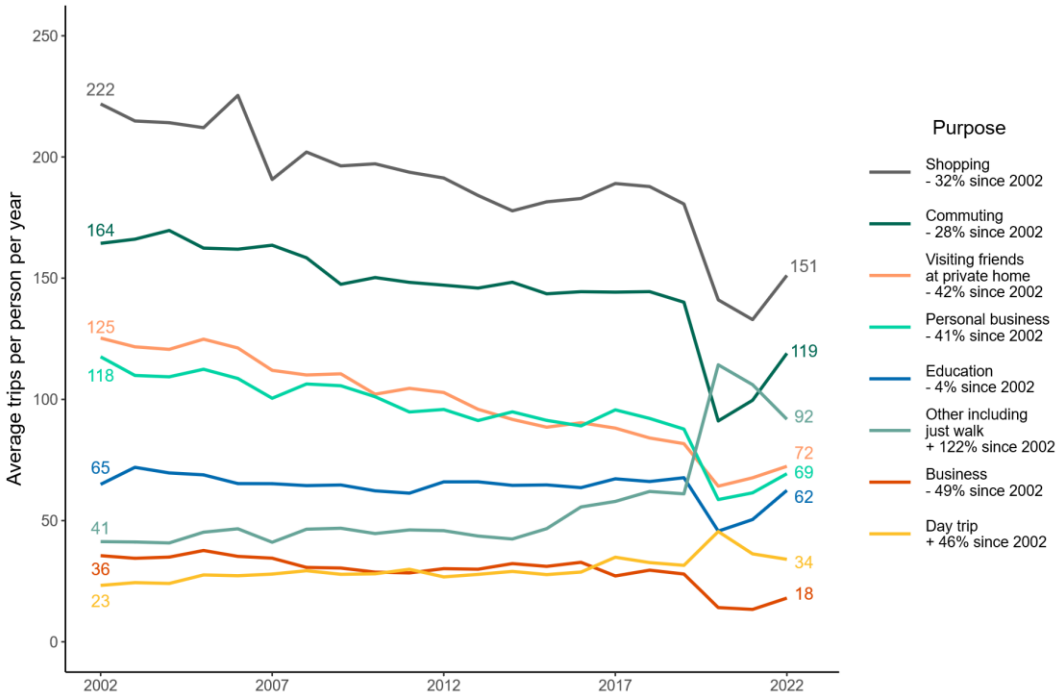


Figure 30. National data on trips per person per year by purpose

2.3. Commuting is the second most common trip purpose, responsible for a fifth of all trips. A further 10% of trips are made to visit educational establishments. Both commuting and education-related trips are likely to occur during the morning and evening peak travel periods.

2.4. Although day trips make up only 6% of all trips nationally, the tourism sector remains vital to Brighton & Hove's economy. Easy access to Brighton & Hove is an important

[35] 2022 National Travel Survey

issue for the economic health of the city. Similarly, while business trips represent just 3% of trips in the NTS, deliveries and servicing are critical to the local economy. Efficient goods delivery supports a thriving business sector.

2.5. To supplement the NTS, we have also commissioned Qa Research to conduct a large-scale household travel survey with a representative sample of residents living across all wards in Brighton & Hove. In total 2,017 surveys were carried out. The primary purpose of this survey was to validate a strategic transport model for the city, but it also affords us useful insights.

2.6. Leisure and shopping

2.7. Despite it being the most common trip purpose, there is far less data available on shopping and leisure trips than on travel to work, which has a dedicated question within the national census. The data we have on traffic volumes and congestion is not matched to survey data on trip purpose so it is difficult to estimate the impact that leisure and shopping activity has on the performance of the road network.

2.8. Ninety three percent of respondents to the council household travel survey, conducted by Qa Research said that they make journeys for 'local shopping / personal business'. The more local nature of these types of journeys was reflected in the modes of transport used, with 'walk' the most common mode. Around a fifth of respondents most often drive a car or van for these types of journeys.

2.9. The council has commissioned an analysis to understand which areas of the city have services such as education, health, leisure, and retail within a walkable distance. The output of this analysis is shown in Figure 31, which is a heatmap showing which areas of the city have a concentration of different services within walking distance.

2.10. Most areas of Brighton & Hove benefit from proximity to convenience retail and other associated local centre uses. In the council's City Plan a local centre is defined as a retail cluster that typically includes a small supermarket, a newsagent, post office, pharmacy, hot food takeaway and launderette.

2.11. Some areas, such as Moulescoomb, Hollingbury and Bevendean, have no identified retail clusters that meet the criteria to be classified as a local centres though local shops and smaller parades do provide for day-to-day services. We could expect that residents of these areas will need to travel further afield to meet their retail needs. To understand each area in detail we are able to draw on comprehensive Urban Characterisation Studies, which forms part of the evidence base for the City Plan[36].

[36] Brighton & Hove City Council 2009, Urban Characterisation Study

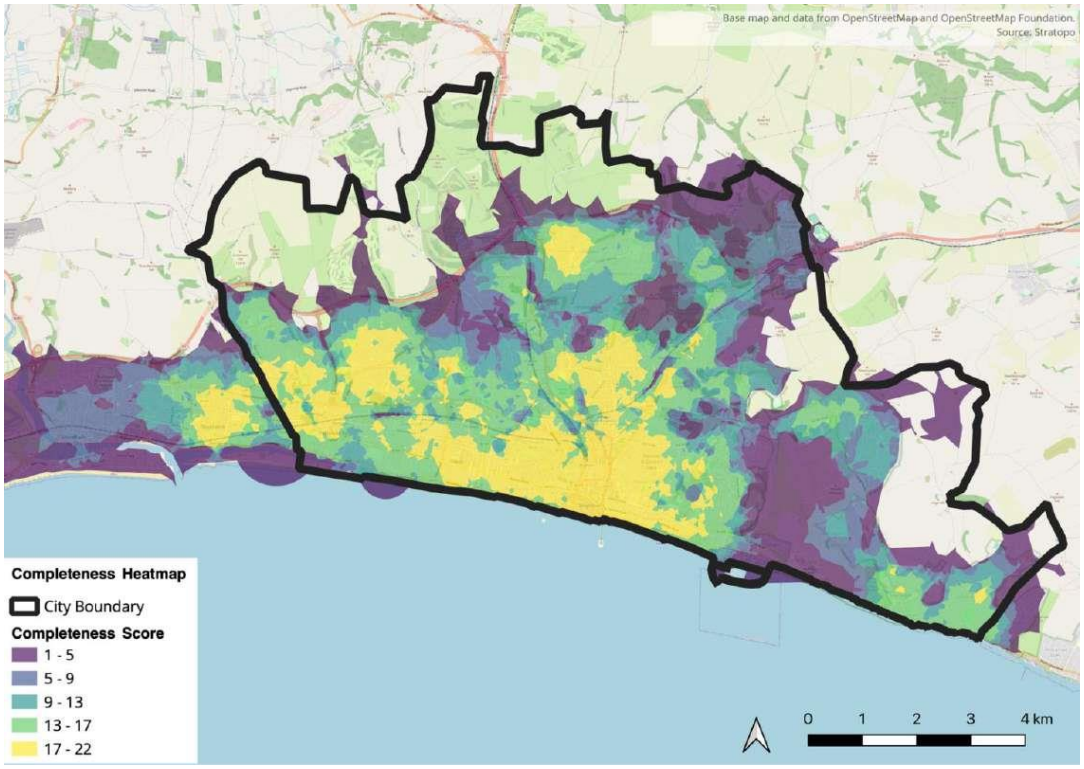


Figure 31. Heatmap of facilities within walking distance. The higher the score, the more complete the provision of services and facilities. Troy Planning + Design in partnership with Stratopo

2.12. Respondents to the council household travel survey said that when making journeys for 'city centre shopping / personal business', the most common mode of transport was 'bus' (45%), followed by 'walk' (23%), and responses varied significantly by ward. Those living in more central wards were more likely to walk, and those living in outlying wards were more likely to use a bus or car.

2.13. Respondents were most likely to use delivery services for 'other goods, for example, clothes, homeware, with 73% ever receiving deliveries, and this was also the most likely to be received more often than once a week (10% said 2-5 days a week).

2.14. Fifty-five percent of respondents reported that they receive deliveries of 'Takeaway food' and 36% receive deliveries of 'groceries (including milk deliveries)'. A smaller proportion of respondents ever receive deliveries of 'Prescriptions' (13%) or 'Subscription boxes (for example, fruit and veg)' (12%).

2.15. There were some significant differences by age group, particularly those aged 65+. Respondents in this age group were significantly less likely than other age groups to ever receive deliveries of 'other goods' (50%), 'groceries' (28%), and 'takeaways' (23%). They were, however, significantly more likely than other age groups to receive 'prescriptions' via home delivery (26%).

2.16. Overall, 83% of respondents said that they do not currently use pick-up points (as an alternative to home delivery). Of the 17% that do use dedicated pick-up points, walking or wheeling to collect (12%) or driving to collect (3%) were the two most common methods used to collect the goods. There was some demographic variation

in the usage of pick-up points. Those aged 25-34 are the most likely to use them (26%), and those aged 65+ are the least likely (9%).

2.17. Brighton & Hove's city centre is a regional destination, with a catchment extending beyond Sussex for both shopping and leisure trips. Brighton & Hove is also in the top 10 urban destinations for international visitors to the UK with 339,000 visits[37]. Proximity and easy access to Gatwick and London are contributory factors to the city's performance in international tourism.

2.18. Research[38] on visitors tends to focus on the number, origin and value of visitors to the city rather than impact on the transport network or visitors' satisfaction with it. However, results from a 2018 survey of visitors[39] show that 42% of all visitors had travelled to Brighton & Hove by private vehicle (car/ van/ motorcycle or motorhome), 54% of all visitors used public transport (a train or coach/bus service) and 2% had arrived in the city as part of a coach tour.

2.19. The most popular activity undertaken by visitors was just walking around (81%), followed by going out for something to eat (76%), visiting the beach/seafront (75%), shopping (51%), and visiting a tourist attraction (46%). The main attractions visited were the pier (59%), the Royal Pavilion (29%), and the British Airways i360 (23%). This suggests that walking was the primary mode of transport used by visitors.

2.20. Transport in the city was generally positively rated across different modes. 'Ease of finding way around' was scored 8.66 out of 10. Transport in the city – cycles and Transport in the city – buses both scored over 8. The one exception was 'value for money of parking' which scored 5.27 out of 10.

2.21. In 2019, the last year before the impact of Covid, there were 1.67 million visitors who stayed overnight and 10.7 million day visits. Visitors are most likely to come from the London area or the south east and consequently the A23 corridor is the most important for visitors to the city. The city receives a lot of day visitors who tend to travel from the capital at weekends, in the summer months and for big festivals and events.

2.22. In 2023, Brighton & Hove attracted approximately 11.8 million visits[40]. Of these, 1.6 million were overnight visitors. While this is below the 2019 figure it still generated £1.3 billion in economic impact and supported more than 23,742 full-time equivalent jobs. Day visitors and conference tourism are particularly strong markets for Brighton & Hove. The city ranks 15th position in the UK for corporate and national association meetings.

2.23. Commuter travel

2.24. In the 2021 census, there were 196,400 people of working age (16-64) in the city. 150,000 of these people were economically active, with 74,500 in full-time employment, 27,200 in part-time jobs, and 30,700 self-employed. A large number of

[37] International Passenger Survey 2022
[38] Sussex and Brighton & Hove visitor economy baseline report
[39] Brighton Visitor Survey 2018
[40] BRIGHTON & HOVE VISITOR ECONOMY - 2023

those in full-time employment are likely to have jobs with typical working hours and will be on the move in the AM and PM peak travel times.

2.25. There is a significant student population, making up about 12% of the city's residents. This figure is inclusive of those attending the two universities, students in 6th form education, and those attending further education colleges.

2.26. While the 2021 census was severely affected by Covid it acts as a useful case study for what the maximum level of working from home could possibly be; 42.7%. However, it does not tell us much about more typical commuting patterns. For this we have to look back to the 2011 census, while acknowledging that the pandemic will have led to some permanent alterations in how people travel. In 2011 only 7.6% of people worked from home in Brighton & Hove. The most popular method of travel to work was by car, at 37.5%, walking, at 20% and bus, at 13.6%.

2.27. In 2011 there were 32,000 people commuting into the city to work and 37,000 commuting out[41]. The below heatmap shows job density in the city. The concentration of jobs is highest in Brighton Central, although parts of Hove, the University campuses in Falmer and Shoreham port all have high job densities. These employment sites are trip generators at peak periods.

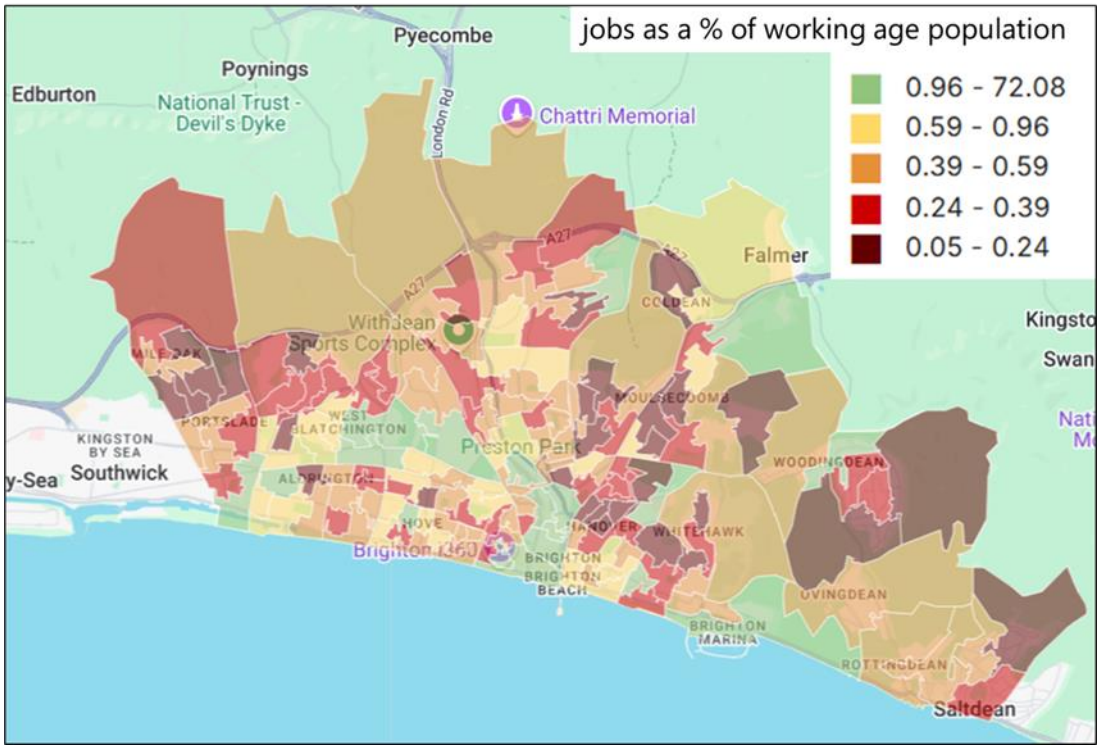


Figure 32 Brighton & Hove Job Density - jobs as a % of working age population

2.28. Figure 33 below illustrates travel-to-work inflows to central Brighton based on the 2011 Census. The thickness of the blue lines represents the number of people commuting from different destinations. The DataShine tool this map is taken from[42] illustrates the large number of journeys made by residents of Brighton & Hove to

[41] Brighton & Hove Economic Strategy, Socio-Economic Evidence Base 2018
[42] Datashine Commute. Produced by Oliver O'Brien

reach jobs in the city centre. It also shows the catchment area for commuters outside of the city who are far more likely to travel by car or rail to access jobs in the centre.

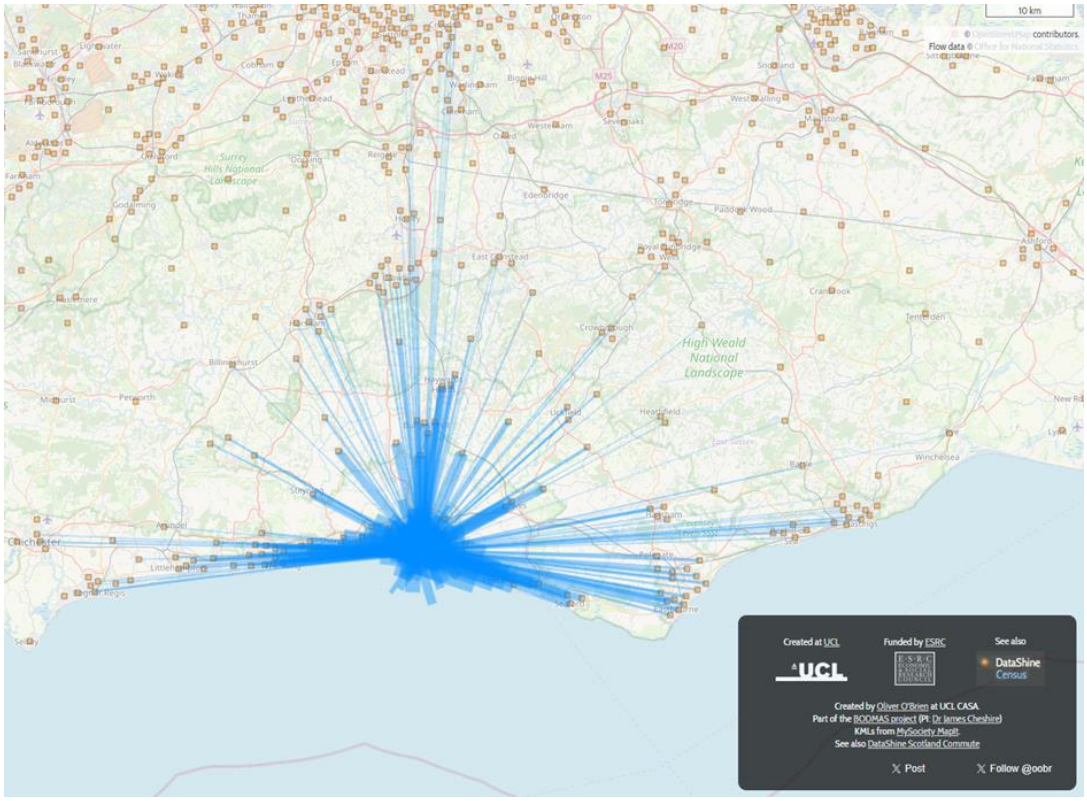


Figure 33: In commuting destinations to central Brighton produced by Oliver O'Brien

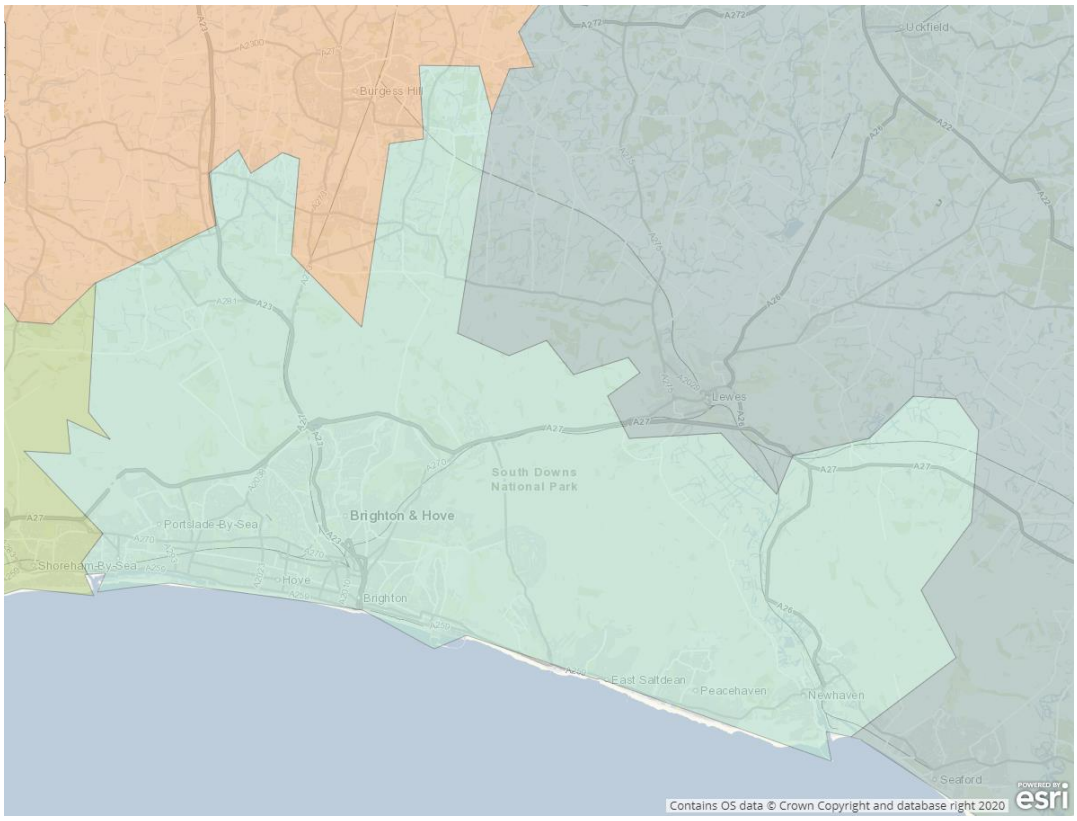


Figure 34 Travel To Work Areas (TTWA) Map

2.29. The commuting catchment of Brighton & Hove is shown by Figure 34 which is the Travel To Work Area (TTWA), based on the 2011 census. TTWAs are produced by statistical analysis and illustrate self-contained labour market areas. They represent areas where most people both live and work, and therefore, relatively few commuters will cross a TTWA boundary on their way to work. Brighton & Hove's TTWA is compact. It only reaches north to some parts of Burgess Hill and extends west just beyond the council's administrative boundary. It extends furthest eastwards, reaching as far as Newhaven.

2.30. Patterns for out commuting from Brighton & Hove are similar to in-flows, with residents of the city travelling to other local settlements such as Lewes for work. There are a significant minority of residents who commute out to central London, with rail being the predominate mode of travel for these trips.

2.31. According to the 2021 Census 37.4% of households within Brighton & Hove have no access to cars or vans, which is higher than England's average of 23.5%. Much of the city has a good level of bus service with 91% of households within 400m of a bus stop with a weekday daytime frequency of 15 minutes or more (BSIP 2021). There are higher rates of working from home, public and active transport use than the average for England. In Brighton & Hove 28.1% commuted via sustainable modes of transport, including 14.3% on foot, 7.1% by bus, 3.8% by bike, 2.5% by train, and 0.4% by taxi.

2.32. The council household survey shows that since Covid travel patterns have changed significantly. A quarter of those either employed or self-employed said that they work from home 'every day', whilst a further 30% said they work from home '2 to 4 days a week'. A minority said they work from home 'once a week' or less often, showing that where an individual works from home, it tends to be for a reasonable proportion of the time. Two fifths (38%) said that they 'never' work from home.

2.33. This pattern varies by the type of employment. Those in part-time paid employment were the most likely to say they 'never' work from home (58%). Meanwhile, those in full-time self-employment were the most likely to say they work from home 'every day' (37%).

2.34. Those working from home at least once a week were then asked to provide more detail about how a typical working week is split between home and their place of work. Levels of home working amongst this group are highest on a Monday and Tuesday (81%), with the proportion then dropping throughout the remaining weekdays to 77% on a Wednesday, 66% on a Thursday, and 65% on a Friday. As would be expected, the proportion working on a Saturday or Sunday is low, with a minority working at home at the weekend (5% on a Saturday and 3% on a Sunday).

2.35. Servicing & deliveries

2.36. Servicing and deliveries are hugely important for the economic health of the city. Detailed city level information about these kinds of trips is lacking so to understand trends that may be affecting Brighton & Hove we have relied on national studies that

are relevant to us. While it is true that more and more shopping is being done online[43] the impact of e-commerce on traffic is less than often imagined. The RAC foundation has concluded that e-commerce has actually had a limited positive effect[44]. A briefing note by the Centre for Sustainable Road Freight[45] also concluded that last-mile delivery of online shopping has resulted in an increase in total commercial freight transport between shops/depots and homes but with a related reduction in car trips and other modes of consumer shopping transport.

2.37. With regards reducing the impact of online shopping impacts on the transport network there are actions that can be taken, particularly around reducing failed delivery rates and reducing the frequency of returned goods. Further analysis is needed of the impact of general freight on the road network and how this can be minimised.

2.38. Figure 35 shows the upward trend of Light Goods Vehicles (LGVs) registered in the city. There were 11,900 LGVs or vans registered in the Brighton & Hove area in 2023, which is 10.7% of the total fleet. However, most vans (54%) are used for carrying equipment, tools, and materials in the service of tradespeople or builders[46]. Delivery or collection of goods accounts for 16% of van usage, although a greater proportion of mileage as they are more intensively used.

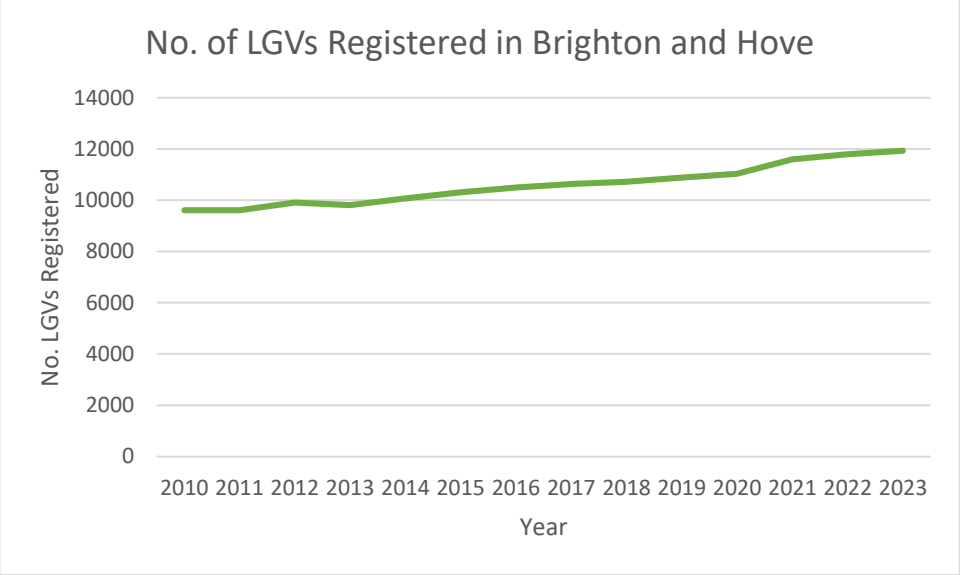


Figure 35. Number of licensed LGVs in Brighton and Hove between 2010 and 2023. Source: Vehicle licensing statistics data tables

[43] ONS. E-commerce & ICT activity
[44] RAC Foundation. 2017: Implications of Internet Shopping Growth on Van Fleet and Traffic Activity
[45] Centre for Sustainable Road Freight. 2021: Online shopping and last mile deliveries.
[46] DfT. Statistical Release – Vans. April 2021

3. Part 3 Carbon emissions and quantifying reductions

3.1. This part of the document is split into three sections. The context and background section covers what the national requirement for carbon emission reduction is and specific actions required in the surface transport sector. The second section on baseline emissions looks at what future emissions in Brighton & Hove are estimated to be, excluding policies contained in Our Transport Plan 2035. It also discusses what emissions need to be reduced by if national emission reduction targets are to be met. The third section assesses what impact the policies in Our City Transport Plan 2035 will have on reducing emissions. **Error! Reference source not found.** illustrates the emissions assessment processes we have undertaken.



Figure 36. Process for quantifying the impact transport policies will have on carbon emission reduction

3.2. Context and background

3.3. To help meet the UK's legally binding commitments around carbon emission reduction, the 2008 Climate Change Act (amended in 2019) established the Committee on Climate Change (CCC). This expert, independent body advises the UK and devolved governments on meeting greenhouse gas (GHG) emission targets and reports to Parliament on the progress made in reducing them. While the end goal is to achieve Net Zero by 2050, the volume of emissions emitted between now and 2050 is just as important. The UK has agreed a set amount of carbon it can emit over this period, referred to as a carbon budget.

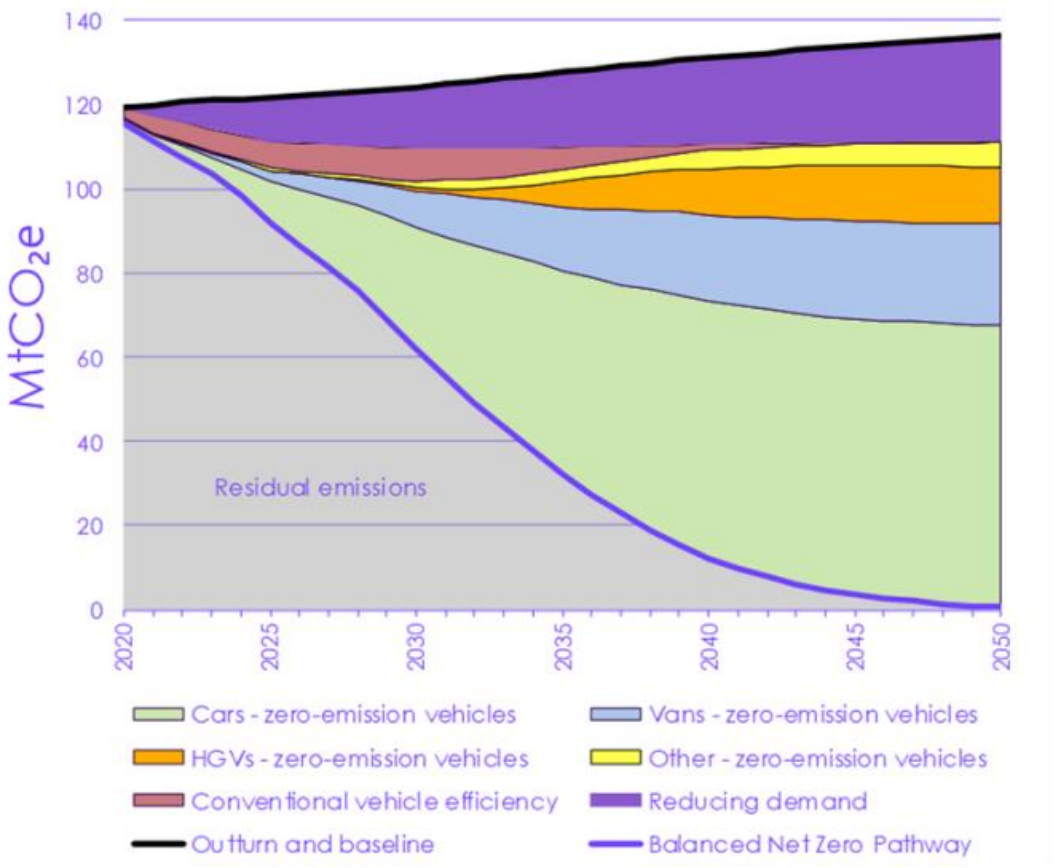
Greenhouse gases (GHGs) explained. GHG emissions refers to a group of gases, which includes carbon dioxide, methane, nitrous oxide and others. When present in our atmosphere these GHGs trap heat within it. In this document the term 'carbon emissions' is used to refer to all GHGs. Carbon dioxide is the most prevalent of the GHGs and GHG emissions are reported in units of carbon dioxide equivalent (**CO_2e).** This unit takes account of the different heating impacts of the various GHGs, methane for example traps 28 times more heat over a 20-year period than carbon, and reports them as an equivalent amount of carbon dioxide.

3.4. Since 2008 central government has been required to set carbon budgets for 5-year periods, twelve years in advance. The CCC assists in the budget setting process by producing a report with recommendations. We are now in the 4th carbon budget period, which covers 2023-2027 and allows 1,950MtCO2e to be emitted within that period. The 5th and 6th carbon budgets have already been published to cover the period up to 2037. For context, in 2019, the total emissions from surface transport in the UK were 113MtCO2e; 22% of the total annual UK GHG emissions.

3.5. The CCC has assessed how the UK can stay within its carbon budget and have produced a preferred 'balanced pathway' to Net Zero. They have also published a summary of what measures are required to reduce carbon emissions from the surface transport sector[47]. There are three key actions:

- transitioning the UK fleet of vehicles so that they are zero emission
- reducing travel demand and shifting journeys onto lower carbon modes
- making fossil fuel-powered vehicles more fuel efficient

3.6. The chart below illustrates how these three actions will contribute to achieving the balanced pathway to reduce emissions at the national level. Up to 2025, the most significant emissions reductions will be made by reducing demand / achieving modal shift and improving conventional vehicle efficiency. As the proportion of zero-emission vehicles in the UK fleet grows, so does their contribution to reducing emissions. Zero-emission cars and vans will make the earliest and largest impact, with HGVs decarbonising from 2030 onwards.



Source: BEIS (2020) *Provisional UK greenhouse gas emissions national statistics 2019*; CCC analysis.

Figure 37. Surface Transport GHG emission reductions by area in the balanced pathway scenario. Chart reproduced from the CCC's Sixth Carbon Budget: Surface Transport.

[47] The Sixth Carbon Budget, Surface Transport. CCC

3.7. While carbon budgets at the national level are well established, they do not exist for individual local authority areas. Our City Transport Plan 2035 is the first transport strategy we have written that includes an estimate of local carbon emissions and an estimate of the impact our policies will have on reducing them. To do this, we have used a tool commissioned by England's sub-national transport bodies (STBs) specifically for this purpose: the Carbon Assessment Playbook (CAP), which was launched in September 2024.

3.8. Guidance on how local authorities should quantify carbon emissions for local transport planning was published in August 2025[48]. Chapter 3 of this guidance,on estimating current and future emissions at an area-wide level refers to the CAP; 'In most regions, area-wide estimates of user carbon have already been prepared at a regional level. Where this is the case, authorities can obtain this and will not need to undertake the analysis themselves. Tools and resources also exist to help local authorities estimate infrastructure emissions across their activities.'

3.9. Brighton & Hove Baseline Emissions

3.10. There are different ways of measuring GHG emissions. The CAP tool measures territorial emissions, those generated within the administrative boundary of the council. The territorial focus means that transport activity by residents of Brighton & Hove, which occurs outside the boundaries of the council, is excluded. The CAP tool limits the scope of emissions to only include those elements of the transport network that we have direct influence or control over; the road network. Emissions from the use of the rail lines within Brighton & Hove are outside of our influence. For the avoidance of doubt, emissions that are out of scope are listed in Table 6, along with the responsible body.

Excluded emissions	Reason	Responsible body
Travel by Brighton & Hove residents is outside of the council's administrative area.	Outside of the council territorial area and control.	DfT
From the manufacture of vehicles and fuel used within the council's administrative area.	Outside of the council territorial area and control.	No single organisation.
From the rail network within Brighton & Hove.	Outside of the council control	DfT
From the maintenance/repair of the local road network.	To be assessed in future Highway Asset Management Plan updates.	The council

Table 6. Out-of-scope Emissions, Corresponding Reasons and responsible bodies

3.11. Underpinning the data in the CAP tool are estimates produced by the Department for Energy Security and Net Zero (DESNZ) of CO_2 emissions attributable to the local road network for each local transport authority. This estimate is based on the observed mileage travelled, the fleet composition, and fuel consumption. A fuller

[48] Local Transport quantifiable carbon guidance

explanation of the methodology is available in the relevant technical note[49]. The baseline year used in the CAP tool is 2019 to avoid the disruption caused by the Covid-19 pandemic.

3.12. The CAP tool shows historic GHG emissions from vehicles using the council's road network, up to 2019. It also contains three future scenarios of what annual emissions up to 2050 could be. The main variable between the three scenarios is the rate at which EVs replace conventionally powered vehicles. The rate of uptake of EVs varies greatly across the UK, meaning that road-based emissions will fall much faster in some areas than others. Sales of EVs in the Brighton & Hove area tend to be around the national average[50].

3.13. In this document, we have chosen to use just one of these scenarios as our future baseline (known as localised ZEV uptake within the CAP) as it best reflects current national policies, such as the Zero Emission Vehicle (ZEV) mandate. As with any modelling of future events, the future baseline is not a prediction of what will happen, but rather a guide to what is probable.

> The Zero Emission Vehicle mandate came into effect in January 2024. It requires car manufacturers to sell a minimum percentage of electric vehicles each year or face financial penalties. In 2024 22% of manufacturer's new car sales and 10% of their van sales had to be zero emission. This target rises each year so that by 2030 80% of new car sales and 70% of new van sales have to be zero emission. By 2035 100% of car and van sales need to be zero emission.

3.14. It should be noted that up until 2023, the uptake of EVs within Brighton & Hove was below the projections used in our future baseline scenario. Under the future baseline, 5% of the car and van fleet using our roads were projected to be zero-emission in 2023. However, only 2% of vehicles registered in Brighton & Hove in 2023 were zero-emission. With approximately 104,300 vehicles registered in Brighton & Hove, this means that there were around 3,100 fewer zero-emission vehicles registered than projected. We anticipate that the ZEV mandate will greatly increase the sales of zero-emission vehicles. Full year data on local vehicle registrations have yet to be released for 2024, but we will continue to monitor uptake data to ensure that our chosen future baseline is the most appropriate to use.

3.15. While the CAP includes future baseline scenarios that take into account the varying uptake of EVs in different areas, it does not include localised carbon pathways that do the same. Instead, it scales the CCC national balanced pathway for road-based emissions to each local area. This acts as an indicative trajectory of how quickly road-based emissions would need to fall if following the same pace as that of the national pathway. Some local authority areas could be expected to overperform against the national balanced pathway, while others underperform. Without localised carbon reduction pathways that coordinate the variable emissions reductions across regions, we do not have specific carbon emission reductions that we need to achieve.

[49] 2005-2020 UK local and regional greenhouse gas emissions technical report
[50] DfT Vehicle licensing statistics

3.16. Figure 38 below shows Brighton & Hove's historic GHG emissions up to 2019, our projected future baseline of emissions, and a locally scaled version of the CCC national balanced pathway, which acts as a rough guide of where emissions need to be. It illustrates that more than 400ktCO_2e of GHG emissions were produced by vehicles within Brighton & Hove in 2005. While there have been some fluctuations, the overall trend has been downward, reaching 329ktCO_2e in 2019.

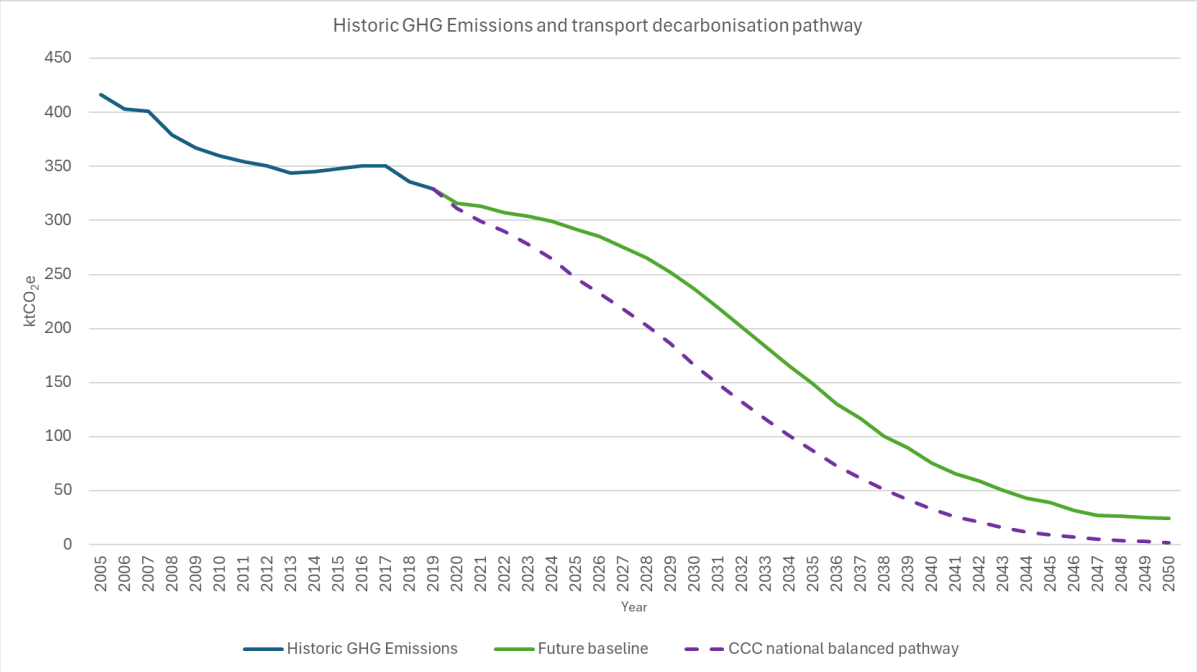


Figure 38. Past and projected emissions from vehicles using the road network within Brighton & Hove.

3.17. The future baseline scenario anticipates that carbon emissions will continue to decrease, but the reductions will not be enough to meet the locally scaled national balanced pathway to Net Zero. By 2035, emissions are projected to drop to 149ktCO_2e under the future baseline scenario. If local emissions within Brighton & Hove were to exactly mirror the rate of reduction required at the national level, then by 2035 local emissions would need to be 87ktCO_2e.

3.18. Figure 39 shows the cumulative carbon emissions over the period 2019 – 2050 under both the future baseline and locally scaled CCC national balanced pathway. Using the balanced pathway as a guide, Brighton & Hove's approximate carbon budget from road transport emissions would be around 3,978ktCO_2e. between 2019-2050. Under the future baseline scenario, we are projected to emit 5,300ktCO_2e, which is 1,322ktCO2e more. To greatly reduce this gap, additional policy measures are needed at both the national and local levels.

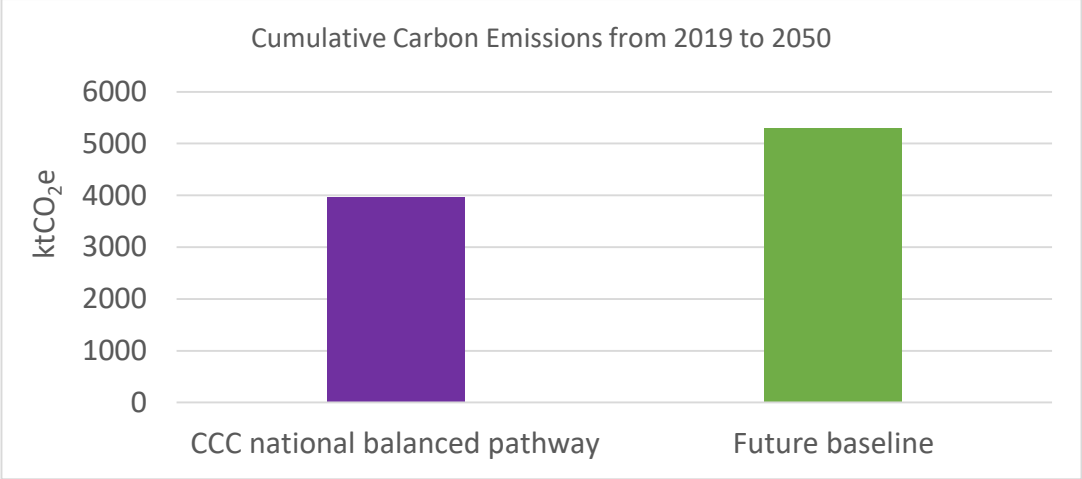


Figure 39. Cumulative carbon emissions from 2019 to 2050

3.19. Quantifying emissions reductions of local policy measures

3.20. This section presents our assessment of the impact that policies contained in Our City Transport Plan 2035 will have on reducing emissions. As noted in paragraph 3.5 the CCC has set out three key actions required to reduce carbon emissions from the surface transport sector. Firstly, transitioning the UK fleet of vehicles so that they are zero emissions. Secondly, reducing travel demand and shifting journeys onto lower-carbon modes. And thirdly, making fossil fuel-powered vehicles more fuel efficient.

3.21. National policies, such as the ZEV mandate, will be instrumental in delivering these three measures, but local policies also have a role to play. The council can support people switching to zero-emission vehicles by providing access to electric vehicle charging infrastructure. This is essential for those who do not have access to off-street parking and who will rely on public chargers to refuel. For larger vehicles, like buses and trucks, it is unclear if the route to Net Zero will be electrification or an alternative, like hydrogen. However, for cars and vans, electrification is the most likely route, with many EV models already available. The council's Electric Vehicle Charging Plan sets out the details of how we will provide charging infrastructure.

3.22. Reducing travel demand can be achieved through measures such as increased homeworking. Through management of the roads under our control, the council can also influence people's travel choices and make choosing low-carbon modes, such as public transport, walking, and cycling, easier. The CCC has concluded that these measures are necessary to achieve Net Zero[47] and stay within the national carbon budget. Improving walking and cycling infrastructure, along with bus priority measures, are proven ways for transport authorities to enable more people to use these modes.

3.23. The third key action, making fossil fuel-powered vehicles more efficient, is a measure that will largely be driven by central government regulation and industry. Over the past two decades, vehicle fuel efficiency has improved, but since 2017, average vehicle emissions have increased. The CCC attributes this to the increase in purchases of larger vehicles, such as SUVs[51]. Through our parking policies, it is possible that the council could incentivise the purchase of smaller, lighter vehicles.

[51] Sector Summary: Surface Transport, page 62

3.24. The CAP includes a Policy Builder tool that contains 29 different types of transport interventions. In the tool, the city is split into 33 zones, known as medium level super output areas (MSOA), as shown in Figure 45. The areas are categorised into inner urban and city suburban based on the typical transport usage profile of households within the MSOA.

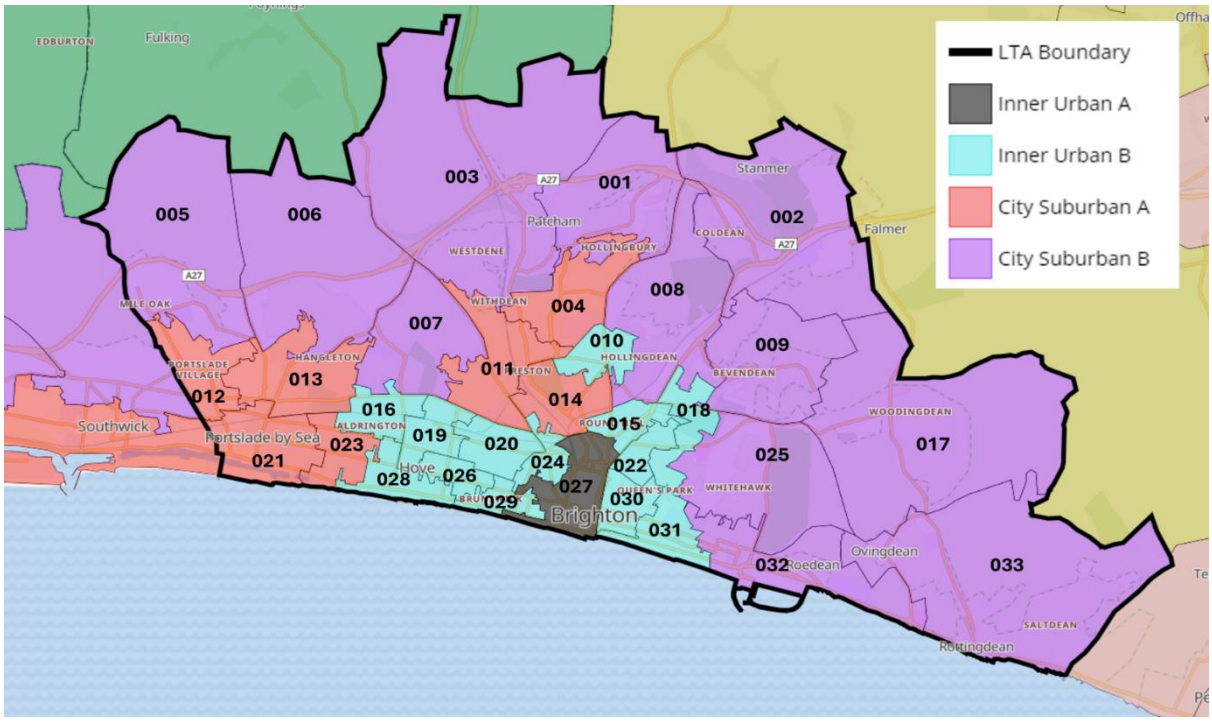


Figure 40. MSOA-sized Zones within the council

3.25. In the Policy Builder tool, we can build up a package of interventions. For each intervention, we can choose where (geographical scope), when (build profile) and at what intensity the different interventions would be implemented up until 2050. The tool then estimates what the cumulative impact of the chosen policy measures will be.

3.26. The 29 interventions are shown in Table 7 below. One limitation of the Policy Builder tool is that the list of policy measures is not exhaustive. For example, there are no measures that will impact van freight emissions, such as freight consolidation centres.

Category	Intervention
Active travel	Improved pedestrian infrastructure
Active travel	Improved cycling infrastructure
Active travel	(e-)Mobility hire schemes
Behavioural change	Area-wide travel planning/mobility management
Behavioural change	EV car clubs
Behavioural change	Incentive-based apps
Behavioural change	Campaigns for a switch to LEV fleets

Behavioural change	Business Travel Plans
Behavioural change	Support for car sharing
Behavioural change	School Travel Plans
Integrated planning policy	20-Minute neighbourhoods
Integrated planning policy	High-density developments
Low-emission vehicles	Low-emission public transport fleets
Low-emission vehicles	EV Charging infrastructure
Low-emission vehicles	Support EV uptake in corporate fleets
Parking, charging & traffic management	Road user charging/tolls
Parking, charging & traffic management	Off-street parking measures
Parking, charging & traffic management	On-street parking measures
Parking, charging & traffic management	Workplace parking levy
Parking, charging & traffic management	Low Traffic Neighbourhoods (LTNs)
Parking, charging & traffic management	Cordon-based charges and restrictions
Public transport	Bus priority measures
Public transport	Improved bus/LRT frequency
Public transport	Mobility hubs
Public transport	Reduced public transport fares
Public transport	Demand-responsive transport (DRT)
Public transport	Extended public transport network
Public transport	New rail stations/line opening
Technology	Integrated ticketing, information & Mobility as a Service

Table 7. The 29 interventions in the CAP Policy Builder tool

3.27. We created three packages of interventions in the Policy Builder tool to represent different scenarios. These are listed in Table 8. The Business-as-Usual scenario (BaU) is based on existing commitments that have been made, excluding any new proposals in Our City Transport Plan 2035. In contrast, the Do Max scenario attempts to understand what impact local policies would have if we committed to doing everything possible to reduce carbon emissions. It is intended to illustrate what the limit is to what we can achieve locally. The Our City Transport Plan 2035 scenario is based on the policies contained in the proposed plan.

Scenarios	**Assumptions**	**Number of interventions applied**
Business as Usual (BAU)	Current levels of funding and a similar level of intervention in the recent past	15
Our City Transport Plan 2035	Some increased funding and a greater level of intervention	27
Do Max	Generous resources and GHG reduction are the overriding priority	28

Table 8. The council Transport Policy Scenarios and Assumptions

3.28. Each scenario is underpinned by a set of assumptions about which interventions will be implemented, where, how intensely, and over what time period. Table 9 shows a

worked example for the intervention road user charging/tolls to demonstrate our approach.

Scenarios	Assumption	Geographical Scope	Build Profile	Intensity
BAU	No road user charging is introduced.	NA	NA	NA
Our City Transport Plan 2035	The UK govt. introduces a road user charging scheme to replace other road taxes /fuel duty.	Whole city	2040-2042	100
Do Max	The UK govt. introduces a road user charging scheme to replace other road taxes /fuel duty.	Whole city	2030-2032	100

Table 9. Assumptions used for intervention on road user charging/tolls.

3.29. In the BAU scenario, we assume that there is no introduction of road user charging. In the Our City Transport Plan 2035 and Do Max scenarios, we make the assumption that road user charging would only work as a nationwide scheme that replaces existing taxes on vehicles such as fuel duty. In the Do Max scenario, we assume that the date of implementation is at the earliest feasible date, 2030-2032. In the Our City Transport 2035 scenario, we assume that charges are introduced in 2040-42.

3.30. This worked example illustrates how the Policy Builder tool necessitates us to make assumptions about possible future scenarios. Assumptions used for specific interventions in the Our City Transport Plan 2035 scenario should not be interpreted as policy commitments. They only represent one possible way that policies could be implemented.

3.31. In the case of a national road user charging scheme, it is not something that the council has the power to implement. Our assumptions regarding road user charging are based on it being a possible future measure and that if it were implemented, it would make sense to do so at the national level rather than individual cities or regions bringing forward their own.

3.32. Because the list of policy interventions in the Policy Builder tool is not exhaustive, the CAP includes a function that allows us to address this by applying estimates of what impact policies may have on areas that are not covered in the tool. These are referred to in the CAP as emission levers.

3.33. We have applied 3 emission levers in the dashboard:

- urban freight solutions – modifying HGV and LGV movements within the urban area
- HGV fuel composition – assessing the impact of accelerating reduction in internal combustion engine-powered HGVs
- car speed on the Strategic Road Network – considering the effect of a reduction in car speed across all types of vehicles

3.34. In the CAP tool, freight vehicles are projected to account for 34.34% of road user emissions by 2050. This represents a significant opportunity for emission reduction that could be addressed. By applying the above emission levers, freight vehicles'

emissions are projected to decrease from 46.57ktCO_2e to 3.48ktCO_2e, with their share of overall emissions falling from 34.34% to 19.80%.

3.35. Figure 41 and 42 show the outputs of the modelling exercise using the Policy Builder tool. The graph in Figure 41 shows the annual reduction in carbon emissions under the modelled scenario and Figure 42 shows the cumulative carbon emissions from 2019 to 2050 under each scenario, compared with the CCC national balanced pathway scaled to local emissions.

3.36. Under the future baseline scenario emissions from use of roads within Brighton & Hove are projected to be 5,300 ktCO2e between 2019 - 2050. Under the locally scaled CCC balanced pathway Brighton & Hove's carbon budget for the same period is 3,978 ktCO_2e, a difference of 1,322 ktCO2e.

3.37. It is clear that all three policy scenarios we have modelled, even the BaU scenario which would be a continuation of our existing policies, will have a significant impact on carbon emissions. However, even the do maximum scenario where emissions are projected to be 4,557 ktCO2e, will not meet those of the locally scaled CCC balanced pathway.

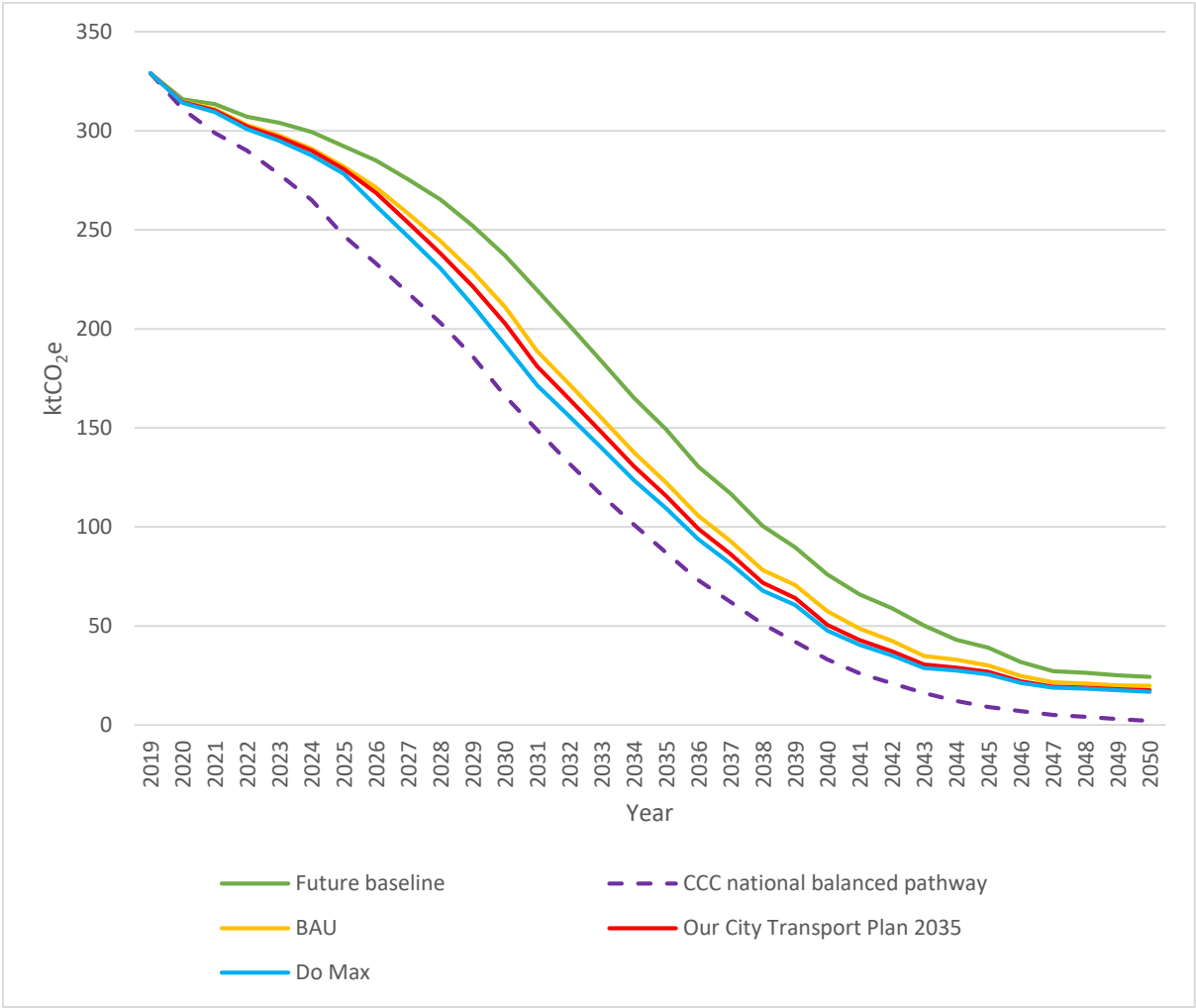


Figure 41. Estimated carbon emission reductions under three future policy scenarios

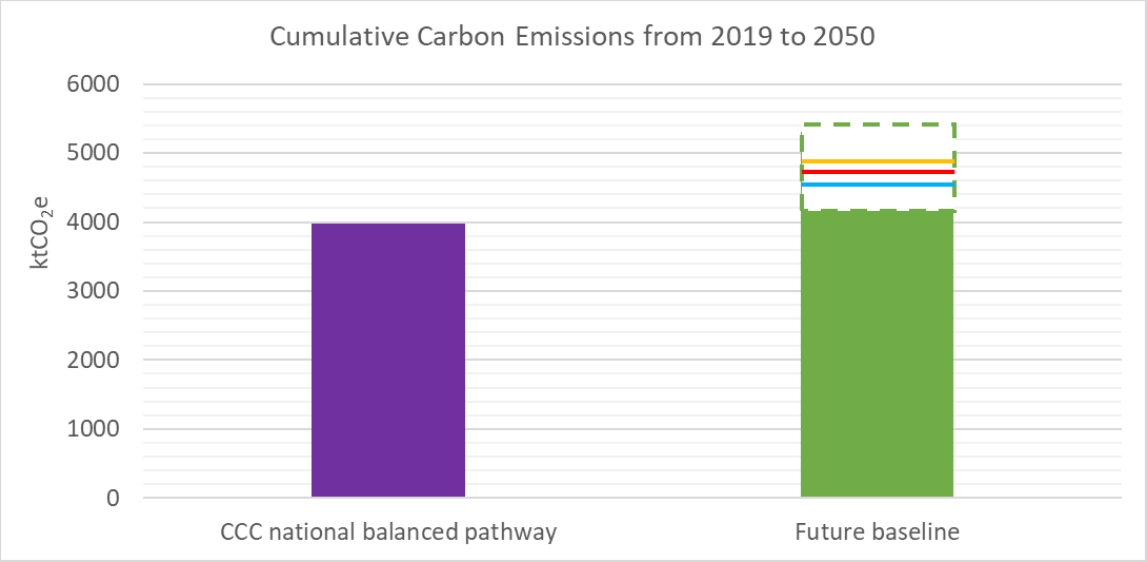


Figure 42. Cumulative carbon emissions from 2019 to 2050

3.38. What this finding means will depend on what other local authorities' findings are. It may be that some are going beyond the locally scaled CCC balanced pathway, to counteract those areas not reaching it. However, if the majority of local authorities are in the same position as us then a discussion with central government will need to take place to understand what additional actions are required and how they will be implemented.

4. Part 4: Policy Alignment Review

4.1. Table 10 lists relevant policies and guidance that has been considered in the creation of Our City Transport Plan 2035.

Publishing body, date: policy	Scope	Alignment
DfT, Integrated National Transport Strategy	National	N/A - Currently being formulated after a call for ideas.
DfT, 2017: Investment Strategy	National	There is good alignment between Our City Transport Plan the Objectives of the DfT Investment Strategy and Our vision, explicitly aligns with the four objectives of the Investment Strategy particularly the objective of creating a more reliable, less congested and better-connected transport network and ultimately making Brighton & Hove a more attractive place for business, trade and invest.
DfT, 2017: Cycling & Walking Investment Strategy	National	There is excellent alignment between these objectives and those in Our City Transport Plan 2035. Similar to the objectives outlined in the Cycling and Walking Investment Strategy, our focus is on creating well-maintained streets and pavements, expanding active travel choices, and delivering a safe, inclusive, and integrated transport system. These efforts aim to encourage more residents to adopt active travel modes and reduce the number of KSI cyclists and pedestrians.
DfT, 2021: Transport Decarbonisation Plan	National	There is good alignment with the Transport Decarbonisation Plan and Our City Transport Plan has been completed using the Carbon Assessment Playbook tool to quantify the impact of our policies.
DfT, 2018: Inclusive Transport Strategy	National	There is excellent alignment between our policies and the Inclusive Transport Strategy. Our approach includes improving pavement and road design for better accessibility, enhancing bus and taxi services, and addressing transport-related social exclusion. We aim to work collaboratively with Brighton & Hove Buses to provide more accessible services with key destinations across the city.
DfT, 2019: Future of Mobility: Urban Strategy	National	We aim to leverage technology to improve travel management and reduce congestion through enhanced data collection and enforcement. Recognising electric and hydrogen power as key solutions for decarbonisation, we also see the potential of innovative mobility hubs in creating a more integrated transport network. The council remains adaptable to future advancements in technology and shifts in consumer adoption.
DfT, 2020: Gear Change – a bold vision for cycling and walking	National	The document highlights the benefits of cycling and walking in relation to health, wellbeing, congestion, environmental and air quality, economy. By providing a better-connected transport network with well-maintained streets, pavements, and cycling

		infrastructure and by encouraging residents to shift to active travel, we can improve public health and wellbeing, enhance air quality, reduce road congestion, and boost shopping footfall.
DfT, 2021: Bus Back Better	National	The strategy focuses on making buses more frequent, faster, reliable, cheaper, and comprehensive. Our vision aligns excellently with this by enhancing bus reliability and speed through dedicated bus priority corridors, improving connections to the suburbs and beyond, and providing better bus service information.
DfT, 2022: Future of Freight Plan	National	While not all of the actions of the Freight plan are for local authorities to deliver there is good alignment in the area of Net Zero and decarbonising transport.
DfT, 2022: UK Electric Vehicle Infrastructure Strategy	National	There is excellent alignment between our plan and this strategy with a strong focus on the challenge of supporting householders without off street parking to be able to switch to EVs.
DfT, 2023: The Plan for Drivers	National	We share the goal of providing smoother journeys and supporting the transition to zero-emission driving. Our 'seek and fix' programme helps identify and repair defective carriageways efficiently.
DfT, 2024: National Networks National Policy Statement	National	The statement focuses on maintaining network performance, meeting customer needs, supporting economic growth, ensuring resilience in networks, advancing net-zero priorities, and enhancing safety. Our key objectives align with these aims by reducing road congestion, maintaining streets and pavements, supporting the transition to low and zero-emission vehicles, and leveraging technology for more effective road management.
DfT, 2024: National Bus Strategy: 2024 Bus Service Improvement Plans	National	The strategy focuses on making buses more frequent, faster, reliable, cheaper, and comprehensive. Our vision aligns with this by enhancing bus reliability and speed through dedicated bus priority corridors, improving connections to the suburbs and beyond, and providing better bus service information.
HM Treasury, 2020: The National Infrastructure Strategy	National	The strategy aims to decarbonise the economy and adapt to climate change by electrification of vehicles and advancing newer technologies such as carbon capture and low-carbon hydrogen. We also focus on facilitating the transition to low and zero-emission vehicles and recognising electric and hydrogen power as a viable solution.
Defra, 2019: Clean Air Strategy	National	The strategy prioritises protecting public health by reducing emissions, including those from transport. We aim to support the transition to low and zero-emission vehicles and recognise electric and hydrogen power as a viable solution.
Department for Levelling Up, Housing and Communities, 2022: Levelling Up the United Kingdom	National	Levelling Up aims to provide everyone with the opportunity to thrive by improving transport, digital connectivity, health, wellbeing, and so on. One of its key missions is to enhance transport networks in all major urban centres and improve local public

		transport connectivity across the country, closer to London's standards. Our vision aligns with this striving for a better-connected city that enhances quality of life in a healthy, inclusive, and sustainable city.
DfDCMS, 2022: Digital Strategy	National	It aims to drive economic growth and innovation by enhancing digital infrastructure, supporting tech businesses, improving digital skills, and strengthening cybersecurity. While not directly related to transport, advancements in digital technology may reduce the need to travel by enabling more remote work. The City Plan outlines how we support the supply and maintenance of efficient digital and telecommunication infrastructure across the city.
Department for Energy Security and Net Zero, 2023: Carbon Budget Delivery Plan	National	This plan outlines how the government aims to meet its legally binding carbon budgets and progress toward net zero by 2050. It includes policies to accelerate the transition to clean energy, support low-carbon transport, and more. As part of the national effort, we have adopted the newly launched Carbon Assessment Playbook to evaluate the carbon impact of various interventions, helping to guide decision-making toward lower emissions.
Department for Culture, Media and Sport, 2023: Get Active: A Strategy for sport and Physical Activity	National	This strategy sets out how the government's commitment is to ensuring everyone has the opportunity to be active. Aligning with this goal, we focus on providing safe and inclusive active travel choices to encourage more people to incorporate physical activity into their daily journeys.
Ministry of Housing, 2025: National Policy Framework	National	It provides a framework for locally prepared plans that can provide for housing and other development sustainably. Our City Transport Plan 2035, alongside the City Plan, sets out a vision and strategic approach for delivering sustainable transport and development in the city.
Defra, 2023: The Air Quality Strategy for England	England	It defines local authorities' powers, responsibilities, and actions to improve air quality for communities. Our focus on reducing road congestion, promoting low and zero-emission vehicles, increasing public transport use, and encouraging active travel aligns with these goals to create cleaner air in the city.
Public Health England, 2020: PHE Strategy	England	The strategy aims to enhance safety, prevent poor health, reduce health inequalities, and support a strong economy. Encouraging people to incorporate physical activity into their daily travel can improve overall health and wellbeing.
TfSE, 2020: Transport Strategy	Regional	This strategy has been referred to throughout the document and schemes in it included within this Plan.
TfSE, 2023: Strategic Investment Plan	Regional	It outlines the region's priorities for transport infrastructure and investment to support sustainable economic growth. Some of the proposed schemes in this plan will

		enhance the connectivity of the city to other areas, improving access to key destinations and supporting regional development.
TfSE, 2018: Economic Connectivity Review	Regional	It emphasises the importance of improving transport links to boost economic performance and ensure greater resilience in the region. We share this goal of improving our transport and travel network to ensure people can move around safely, sustainably, and easily.
Brighton & Hove City Council, 2023: The Council Plan	Local	Our vision is for Brighton & Hove to be a city to be proud of, a healthy, fair, and inclusive city where everyone thrives. Our City Transport Plan 2035 was developed to help achieve this vision by shaping a sustainable and accessible transport future.
Brighton & Hove City Council, 2023: The City Plan part 1 & part 2	Local	They are development plans for the city and a key plan to deliver the transport goals in our City Transport Plan 2035.
Brighton & Hove City Council, 2018: Economic Plan 2024-2027	Local	It outlines a strategic pathway towards a more competitive, productive, fairer and greener economy. Our City Transport Plan 2035 supports delivery of this vision by reducing congestion on our roads and aiming to create a more sustainable, inclusive and accessible transport network.
Brighton & Hove City Council, 2019: Joint Health & Wellbeing Strategy	Local	This strategy envisions that everyone in the city will have the best opportunity to live a healthy, happy and fulfilling life. Our City Transport Plan 2035 supports this by encouraging active travel, helping people stay more active and healthier.
Brighton & Hove City Council 2024-2034: Sport and Physical Activity Strategy	Local	This strategy envisions a more active, healthier city. Our City Transport Plan 2035 supports this goal by enhancing pavements and cycling facilities and delivering new walking and cycling infrastructure to encourage active travel.
Brighton & Hove City Council, 2023: Accessible City Strategy	Local	The council envisions a welcoming, inclusive and accessible city, striving to go beyond legal minimum when providing barrier-free services. Our City Transport Plan 2035 aligns with this vision, aiming to create a truly inclusive transport system.
Brighton & Hove City Council, Air Quality Action Plan 2022-27	Local	Our plan is strongly focused on improving air quality and reducing carbon emissions with the objective of facilitating the uptake of low and zero emission vehicles.
Brighton & Hove City Council, 2030 Carbon Neutral Programme	Local	Our plan is strongly focused on improving air quality and reducing carbon emissions with the objective of facilitating the uptake of low and zero emission vehicles.

Table 10. Relevant Policies and Guidance considered in Our City Transport Plan

5. Part 5: Challenges and Summary

5.1. While there are a variety of transport challenges facing the city this evidence base has been used to identify the priorities that will be addressed in Our City Transport Plan 2035.

Challenge 1: Enabling more people to live safer, healthier and more active lives

5.2. Each year over the past decade the number of people killed and seriously injured on our roads has not reduced and remains around 150 per year. This is unacceptably high. Vulnerable road users, those walking, wheeling, cycling and on motorbikes are at most risk. We believe this number can and should be reduced.

5.3. Related to improving safety is encouraging more people to live active lives because of the health benefits this will being. The council's Sport and Physical Activity Strategy sets out the evidence on the levels of inactivity in the city. For example, less than 50% of children under 16 in the city meet recommended activity guidelines each day. It also sets the objective of creating active environments, which this objective in Our City Transport plan 2035 supports.

Challenge 2: Reduce congestion on our roads

5.4. Figure 13 illustrates that the average delay on local A Roads within Brighton & Hove is among the worst in the country. This is an important challenge to prioritise and tackle because reducing congestion and improving the speed of journeys within the city underpins the economic growth of the city and peoples experience of whether this is a good place to live and visit.

Challenge 3: Supporting the transition to zero and ultra-low emission vehicles

5.5. This challenge focuses on a specific measure that will be highly effective in both improving air quality and reducing carbon emissions. The council's Air Quality Action Plan 2022-27 sets out what the health impacts of air pollution are and why it needs to be addressed. The threat of climate change and need to kerb GHG emissions is also set out elsewhere, such as the DfT's Transport Decarbonisation Plan.

5.6. It is in the Transport Decarbonisation Plan that central government has identified the role local authorities have to play in facilitating the shift to electric vehicles, particularly for households that lack access to off-street parking.

Challenge 4: Creating a transport network that is more inclusive

5.7. The Council Plan 2023-2027 and Accessibility Strategy set out the council's aim to ensure that the city is an inclusive place for all. The evidence presented here is clear that accessing key services is more difficult for those who are less well-off and live in more suburban parts of the city. The evidence is also clear that disabled people make fewer trips and find it harder to access transport. Making a more inclusive transport network has therefore been identified as a challenge that is a priority.

Challenge 5: Maintaining our roads and managing them as efficiently as possible

5.8. Surveys we have commissioned into the condition of our footways and roads shows clearly that the funding which has been allocated to their upkeep over the past 10 years has been inadequate to maintain them. If this continues the state of our streets will continue to worsen. It is basic and fundamental to the good functioning of the city that our streets are kept in a good condition, but securing the finance to do this will be a challenge.

6. Glossary

AQMA – Air Quality Management Areas

Brighton & Hove City Council – The council

BSIP – Bus Service Improvement Plan. A plan setting out improvements up to 2025 and backed by over 27m of central government funding.

CAP – Carbon Assessment Playbook

CCC – Committee on Climate Change. An independent, statutory body established by the Climate Change Act 2008. Its purpose is to advise central government on emissions targets and to report to Parliament on progress made in reducing greenhouse gas emissions and preparing for and adapting to the impacts of climate change.

DESNZ – Department for Energy Security and Net Zero

GHG – Greenhouse Gases

HGV –Heavy Goods Vehicle

KSI – Killed or seriously injured

$ktCO_2e$ – Kilotons of carbon dioxide equivalent. A standardised measure of greenhouse gases, which includes carbon dioxide, methane, nitrous oxide and so on, and expresses the impact they have as an equivalent amount of carbon dioxide.

LGV – Light Goods Vehicle

LCWIP – Local Cycling and Walking Infrastructure Plan

MRN – Major Road Network

MtCO2e – Million tons of carbon dioxide equivalent. A standardised measure of greenhouse gases, which includes carbon dioxide, methane, nitrous oxide and so on, and expresses the impact they have as an equivalent amount of carbon dioxide.

NHT – National Highways and Transport. An organisation which runs a public satisfaction survey. In 2023 111 local authorities participated. In this report tables show the council's score along with a colour indicating how well we performed against other local authorities.

Colour indicating the council's performance is in the top 25% or quartile
Colour indicating the council's performance is in the second quartile and above average
Colour indicating the council's performance is in the third quartile and below average
Colour indicating the council's performance is in the bottom 25% or quartile

NO_2 – Nitrogen Dioxide

NSL – National Speed Limit

NTS – National Travel Survey. Annual survey of approximately 16,000 individuals in 7,000 English households.

PM – Particulate Matter

SRN – Strategic Road Network

STB – Sub-regional transport bodies

TfSE –Transport for the South-East

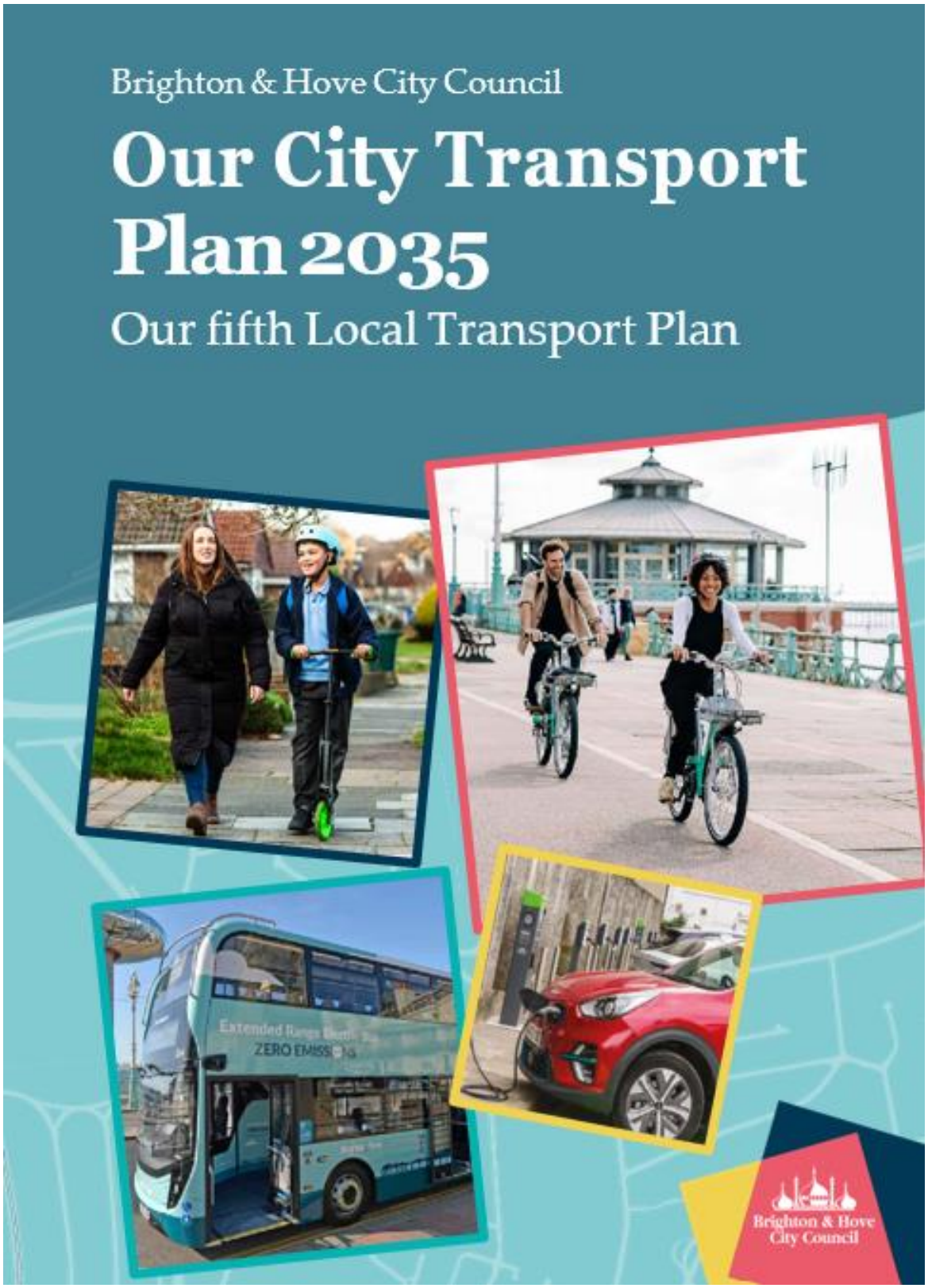
TTWA – Travel To Work Areas

ULEZ – Ultra-low Emission Zone

ZEV – Zero Emission Vehicle

Consultation Report:

Our City Transport Plan 2035



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2 Public consultation – summary

We held a public consultation between 18 June 2025 and 12 September 2025, on the policies contained within the draft version of ‘Our City Transport Plan 2035’. The consultation was chiefly promoted through the council’s website, social media, press releases and through direct emails to local stakeholder groups. We also had advertisements on screens at libraries and sent posters to various organisations across the city.

Our City Transport Plan 2035, along with supporting documents, was available to read online. Paper copies were available in libraries or on request. The main channel for public feedback was an online survey hosted on the council’s consultation portal, Your Voice. There were also opportunities for people to discuss the plan face to face with council officers at drop-in sessions held in local libraries.

We held dedicated sessions at schools to hear from young people, and on Your Voice we hosted a survey adapted to be more accessible for under 18s. We held a 90-minute workshop with a Get Involved Group, organised by Possability People to hear the views of disabled people. A full list of events, poster distribution and workshops/ focus groups are shown in Annex 1 – List of events, workshops and poster distributionIn summary our engagement activity consisted of:

- 500 on-line survey responses.
- A week-long public exhibition at Jubilee Library
- Seven drop-in sessions held in 6 libraries across the city
- Eleven workshops or meetings with stakeholders, including with the Transport Partnership, Local Access Forum and Destination Experience Group.



Figure 1: Consultation postcard

Figure 1 shows an example of the promotional materials developed for the consultation. Postcards, with QR codes to the on-line survey were handed out at events to people who didn’t have time to stop and talk to us.

The main learning from the consultation was that:

- There was a broad agreement that the challenges facing the city had been correctly identified by the plan.
- There was strong support for four of the plans objectives with the objective of 'maintaining our roads and managing them as efficiently as possible' being the best supported.
- All objectives had more support than opposition.
- Disabled people raised strong concerns around accessibility.

3 Online survey feedback

3.1 Process

Our consultation platform, Your Voice, hosted two surveys; our main survey and an adapted version aimed to be more accessible to young people. We invited people to answer a series of questions on; their general travel habits, the challenges identified by the plan, the objectives of the plan and whether they supported specific schemes to be delivered over the coming 5 years. Paper copies of the consultation documents and the questionnaire were available on request. Questions of the survey are listed in Appendix A – Online survey questions. 490 (98%) responses were received online and 10 (2.0%) were received by emails, mainly from organisations or groups.

3.2 Survey results

Respondents & their travel habits

The survey was open to everyone; residents, visitors, people who work here.

Q How are you responding to this survey?

The overwhelming majority of responses, 87%, were from residents. 10% were from people who work or study in the city, 8% were on behalf of an organisation or business and just 3% were from visitors to the city.

The survey asked about people's travel habits before moving onto questions specific to the transport plan. This allows us to see whether the travel habits of people responding to the survey are broadly representative of the general population.

Q What mode of travel do you mostly use for different types of trips?

- Commuting to work: 35% said not applicable. Among the rest, travel modes were fairly evenly distributed, with walking, cycling, bus, train and car accounting for 10-15% each.
- Education: 75% said not applicable. Of the remainder, 8% walk, around 5% use cycling, bus or car; and 2% travel by train.
- Shopping: 35% walk, 24% travel by car, 22% use the bus and 14% cycle.

- Leisure: 33% walk, 23% cycle, while bus and car use are slightly lower at 16-19%.
- Visit the city: 30% walk and 33% use the bus, 13% cycle, 6% travel by car and 5% by train.
- Other modes (Taxi or private hire vehicle, mobility scooter or wheelchair, motorbike or moped): each account for than 1% across all trip purposes.

	1 - Not applicable	2 - Walk	3 - Cycle	4 - Bus	5 - Train	6 - Car	7 - Taxi or private hire vehicle	8 - Mobility scooter or wheelchair	9 - Motorbike or moped
Commuting to work	35.11%	14.04%	15.5%	9.93%	12.59%	11.86%	0.48%	0.24%	0.24%
For education	74.93%	8.45%	5.72%	4.9%	1.63%	4.09%	0%	0.27%	0%
For shopping	3.94%	34.24%	14.04%	21.67%	1.48%	23.89%	0.25%	0.25%	0.25%
For leisure	1.96%	33.33%	23.04%	19.36%	4.66%	16.18%	0.74%	0.49%	0.25%
Visit the city	11.93%	30.46%	13.2%	32.74%	4.82%	6.35%	0.25%	0.25%	0%

Figure 2: Mode of travel respondents mostly use for different types of trip

We have compared the travel habits of respondents to the public consultation with those of a household survey carried out in 2024, which was designed to be representative of the city's population. This shows that respondents to the consultation were more likely than the general population to use sustainable transport such as walking, cycling, buses and trains for work, education and leisure trips.

This means the consultation responses lean towards sustainable transport users, and therefore are *not fully representative* of the wider city population.

For shopping, two categories were considered in the household survey, city centre and local shopping. Respondents who walked or used buses fell between the proportions seen for city centre and local shopping. Cycling was chosen at around 3 times the general public rate, while car use was similar to local shopping levels but higher than for city centre shopping. Train use among respondents was comparable to both shopping categories. There was no direct trip purpose for visiting the city in

the data (though more detailed purposes like visiting health facilities were included), so no comparison was made for this category.

Transport challenges

Respondents were asked to indicate their level of agreement with the key transport challenges the plan identified. A five-point scale allowed people to: strongly agree, agree, neither agree nor disagree, disagree or strongly disagree.

Q Do you agree or disagree that these 5 challenges are what we should focus our resources on tackling?

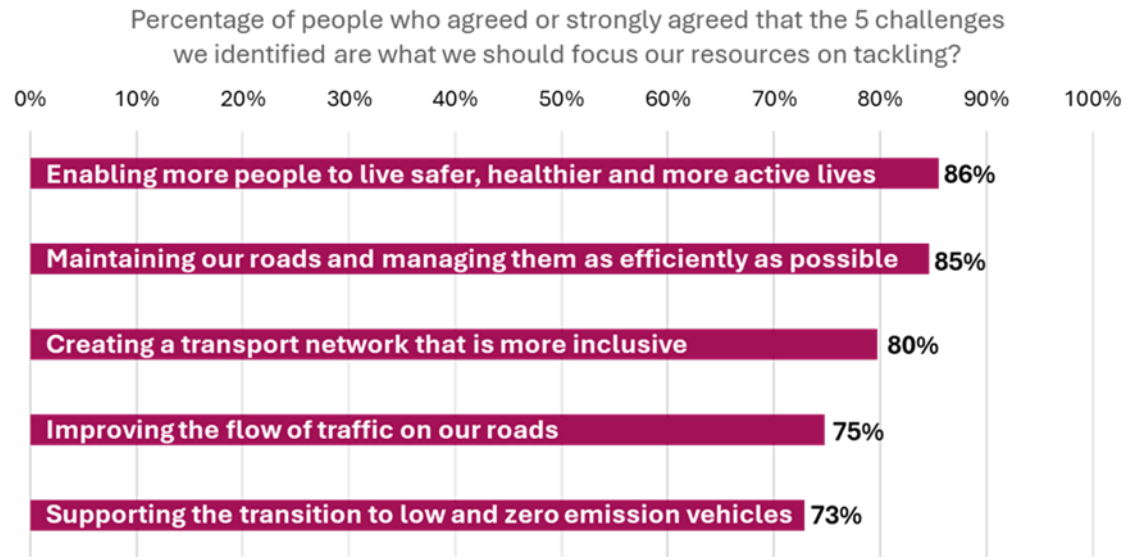


Figure 3: Percentage of respondents who selected 'strongly agree' or 'agree' with the identified transport challenges in the plan

458 people responded to this question. Figure 3 shows the percentage of respondents who selected 'strongly agree' or 'agree' with the transport challenges identified in the plan. Each challenge received support from at least 73% of respondents. In the case of 'Supporting the transition to low and zero emission vehicles', which had the lowest level of support, only 11% of respondents actively disagreed with this challenge while 17% neither agreed nor disagreed. The challenges that had the most support, with greater than 85% of respondents agreeing with them, were 'Enabling more people to live safer, healthier and more active lives' and 'Maintaining our roads and managing them as efficiently as possible'.

People were offered the opportunity to provide comments at specific points in the survey, one of which was on the challenges. However, it was rare for people to use the comments box to respond directly to the questions asked and the comments given were more general in nature regarding transport in the city. For this reason, all comments provided have been analysed together. This is presented in Table 3: Respondents' comments by themesTable 3.

Transport objectives

Again, respondents were asked to indicate their level of agreement using a five-point scale: strongly agree, agree, neither agree nor disagree, disagree or strongly disagree.

Q Do you agree or disagree that these objectives will address the challenges facing the city?

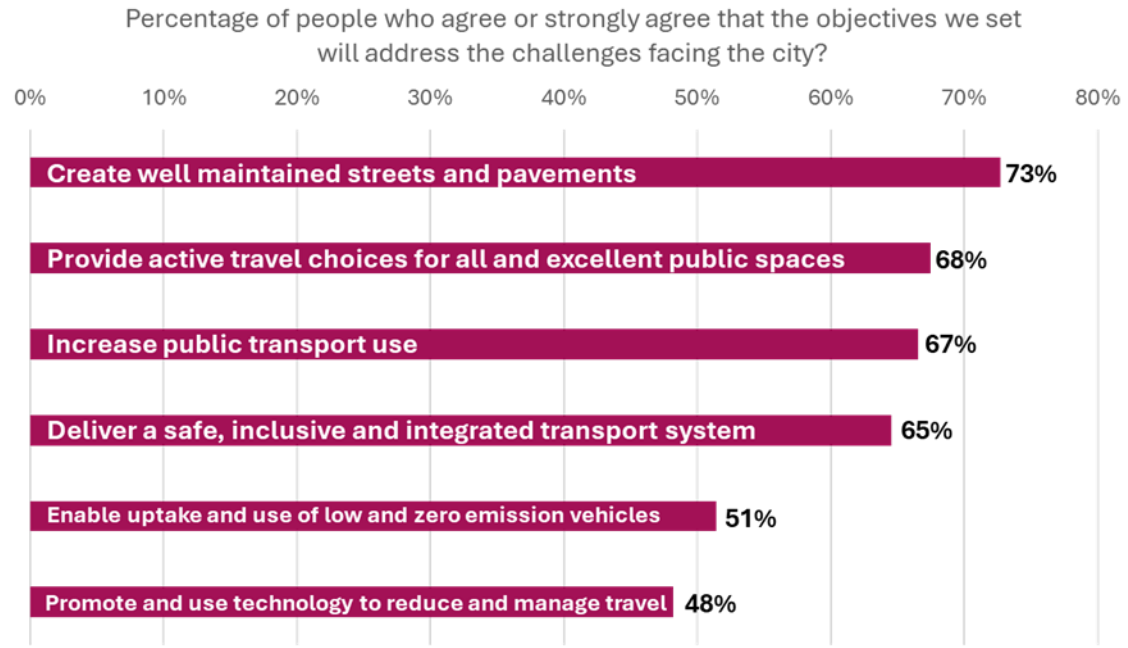


Figure 4: Percentage of respondents who selected 'strongly agree' or 'agree' with the proposed objectives in the plan

455 people responded to this question. Figure 4 shows the percentage of respondents who selected 'strongly agree' or 'agree' with the 6 proposed objectives in the plan. There was a good level of support for four of the objectives with at least 65% of respondents agreeing with them. The objective of 'Create well maintained streets and pavements' was best supported with 73% of respondents in agreement. There was less support for the objectives of 'Enabling the uptake and use of low and zero emission vehicles' at 51% and 'Promote and use technology to reduce and manage travel' at 48%. The percentage of people who disagreed with these objectives were 32% and 27% respectively.

Project types

Q Please rank the project types below in order of importance to you.

The plan set out they were invited to rank both the project types and major schemes according to their importance. The ranking of the seven project types is presented below with *Subsiding public transport to make it more affordable* receiving the strongest support while *Installing electric vehicle chargepoints* receiving the least support.

		Average Score
1.	**Subsidising public transport to make it more affordable**	3.0
2.	**Supporting and encouraging residents, visitors and businesses to use public transport and active travel**	3.3
3.	**Maintenance of our roads and pavements**	3.7
4.	**Improving safety with new crossings for pedestrians, targeted improvements at junctions and outside schools**	3.7
5.	**Improving the accessibility of our streets**	4.3
6.	**Providing local transport hubs where a range of transport modes can be accessed**	4.5
7.	**Installing electric vehicle chargepoints**	5.6

Table 1: Ranking of proposed projects

On the right-hand side, the average scores alongside each project type are shown. The average was calculated by weighting the number of respondents across the priority levels. A lower average score indicates that more respondents ranked the project as a highest priority (i.e. closer to rank 1), while a higher average score reflects lower priority rankings. The scores range from 3.0 to 5.6 which is relatively wide, suggesting that respondents expressed strong differences in their priorities across the project types.

Major schemes

Q Please rank the below major schemes in order of importance to you.

Similar to project types, the ranking of the six major schemes with the average score shown alongside each type.

		Average Score
1.	**Improving priority routes for active travel (walking, wheeling and cycling)**	2.9
2.	**Improving the look and feel of the city centre to make it more pedestrian friendly**	3.1
3.	**Improving bus journeys times in the city through bus lanes and red routes**	3.3
4.	**Sussex Coast Mass Rapid Transit – an express bus or tram that provides quicker connections between Brighton & Hove and other nearby coastal towns**	3.8

5.	**Improving access to the city centre**	3.9
6.	**New transport hubs at the city's edge offering Park & Ride, EV charging, vehicle hire and help reduce city truck traffic**	4.0

Table 2: Ranking of major schemes

Among the six major schemes, Improving priority routes for active travel (walking, wheeling and cycling) received the strongest support. In contrast, *new transport hubs at the city's edge offering Park & Ride, EV charging, vehicle hire and help reduce city truck traffic* received the lease support. This pattern broadly reflects the priorities seen in the project types.

Compare with the average scores of project types, the variation in the scores of major schemes is smaller ranging from 2.9 to 4.0, indicating that respondents viewed all six major schemes as having relatively similar importance.

Public's responses

Respondents also had the opportunity to provide additional comments on the challenges, objectives and the overall plan. For the purpose of analysis, we have amalgamated the answers to these two questions: ***Do you wish to share any comments to support your answers*** **and** ***Please share any other comments about Our City Transport Plan 2035*****.** Many respondents did not answer the questions as written but tended to give general comments as answers to both.

Comments have been coded into themes and number of times each theme was raised has been recorded in Table 3.

Written comments are consistent with how they rated or ranked the challenges/ objectives and projects. For examples:

- The public requested safe cycle network linking different parts of Brighton and more segregated cycle lanes. This reflects the most supported challenges and the second most supported objective, both of which focus on active lives and active travel choices, as well as the highest-ranked major scheme.
- Pavement condition was the third most frequently raised theme under active travel and road condition issues were also highlighted. These concerns align with the most supported objective, the second most supported challenge and the third-ranked project type.
- Public transport affordability was the most raised sub-theme under public transport, echoing the project type ranked first.

Themes	Sub-themes	Comments (top 10 for each theme)	No. of times raised
Active travel	Cycle network	Safe cycle network linking different parts of Brighton/ more segregated cycle lanes	41
	General support	Active travel should be the main priority/ is an effective way to improve transport	34
	Pedestrian	Pavement condition issues (e.g. tree roots growing through pavements, weeds, narrow)	26
	Pedestrianisation & public realm	More designated pedestrian areas	26
	Cycle network	Unsafe to cycle/ insufficient clear and safe cycle routes/ gaps within network	20
	Cycle parking	More secure cycle parking including parking for e-bikes	20
	Less focus	Stop prioritising cycling and red routes	12
	General opposition	Active travel options are not always appropriate.	7
	Pavement clutter	Obstructions block pavement	6
	School streets	School streets are good and should expand	3
Micromobility	E-scooter	Legalise e-scooters	4
Public transport	Bus & train	Affordability - expensive fares	74
	Bus	Dissatisfied with bus services - unreliable, delays, long journey times, live information not working, crowded, unsafe	62
	Mass rapid transit scheme	Calls for trams, underground train systems	30
	Bus	Improve coverage - more bus routes and bus stops to link up every part of Brighton	27
	Inclusivity	Public transport is not accessible and inclusive enough (e.g. not everyone knows how to use app).	25
	General support	Promote use of public transport	21
	Ticketing	Lack of integrated ticketing on local trains and different bus companies	10

Themes	Sub-themes	Comments (top 10 for each theme)	No. of times raised
	Rail connectivity	Improve regional connectivity	7
	Carbon emissions	Support for low and zero emission public transport	6
	Bus	Support for locally own buses/ public ownership	4
Congestion	Congestions	Congestion due to delivery vehicles, tourists, spaces for pedestrians and cyclists	47
	Rat runs	Call to tackle rat runs	1
Maintenance	Roads	Roads condition issues (e.g. potholes)	42
	General comments	Road maintenance is important but not as important as the others	3
	General comments	Maintain existing roads before developing something new	2
Electric vehicles (EVs)	General opposition	EVs do not address congestion, road safety and wilder environment issues. Also, EVs are expensive.	38
	EV chargepoints	Calls for affordable, accessible EV chargepoint network	17
	Opposition to private EVs	Disagreement for EVs as private vehicles	7
Parking	Inclusivity	Parking stress - insufficient spaces, high parking cost, accessibility for disabled people and ease of parking (e.g. do not know how to use mobile phone)	18
	Infrastructure	Better parking infrastructure such as underground/ off-street parking	8
	Cost	Increase parking charges for visitors	6
	Specific jobs	Some jobs such as social workers and traders require vehicles to function	6
	Less parking spaces	Free up on-street parking spaces for protected cycle infrastructure and wider pavements	4
Park & Ride (P&R)	Support with suggestions	Calls for an affordable P&R and to restrict parking in the city centre	34

Themes	Sub-themes	Comments (top 10 for each theme)	No. of times raised
	General opposition	Disagreement in P&R as it still involves vehicles.	7
	General support	Support for P&R	4
Mobility hubs	General support	Support for mobility hubs	5
Environment	Air & noise pollution	Concerns about pollutions especially in the city centre	22
	Street greening	Greater focus on greening our streets and showcasing our heritage	3
Car club	Accessibility	Efficient car club infrastructure/ car club on every street	5
	Affordability	Not affordable	3
	Informal car share	Support for informal car share	2
City centre	Congestion charge	Support for congestion charge/ car free city centre	28
	Parking	City centre is unattractive to visit as it is difficult to park.	15
	Parking	Reduce city centre parking/ reallocate parking spaces to residents' parking	11
	General comments	City centre is accessible/ Valley Gardens makes the place safer	2
Crime	Enforcement	Suggested parking and speeding on 20mph roads enforced by CCTV and Traffic Regulation Orders	7
Inclusivity	School travel	Concerns about transport inclusivity, accessibility and affordability for students	11
	Council's responsibility	Council needs to actively consult and engage with the community	9
	Council's policy	Red routes reduce accessibility to disabled people	8
	Disabled parking	Insufficient disabled parking, parking duration	7
	Access for all	Need a transport system that is inclusive regardless of income	4

Themes	Sub-themes	Comments (top 10 for each theme)	No. of times raised
	Accessibility	More dropped kerbs	3
Private car	Reduce cars	Reduce cars and car journeys	34
	Negative impacts	Concerns about car dominance/ car reliance/ high car ownership	24
	Alternatives	Prioritise viable alternatives (safer, more accessible, cleaner)	19
	Negative impacts	Vehicle size concerns - larger and heavier vehicles pay the same parking charge, but induce more pollution	9
	A27 junctions	Improve A27 junction capacity	2
	Education	Educate drivers on the Highway Code	2
Safety	Pedestrians	Concern about risks posed by e-scooters, delivery e-bikes and cyclist behaviour	23
	Parking	Pavement parking creates safety issues and reduces spaces/ pedestrians	13
	Cycling	Careless drivers make cycling dangerous	9
	Cycle theft	Risk of bikes being stolen/ insufficient safe parking and cargo bike parking	5
	Pedestrians	Concern about pedestrian safety/ unsafe crossings	8
		Campaign for cyclists/ Powered-two-wheeled vehicles to obey road rules	6
	Floating bus stops	Disagreement on floating bus stops	3
	Lighting	Unsafe in unlit areas	3
	Active travel	Properly segregate shared space	2
	Traffic calming	Speed bumps, continuous/ zebra crossings to slow vehicle speeds	2
	Safety concerns	Increasing anti-social behaviour	2

Themes	Sub-themes	Comments (top 10 for each theme)	No. of times raised
Technology	General opposition	Never sure about technology being a clear positive/ costly	9
	Driverless cars	Concern about their introduction (e.g. vague responsibility of collisions)	8
	General support	Technology will be useful if it increases convenience for people	3
Our City Transport Plan 2035	General opposition	The plan will inconvenience car drivers	15
	General support	Support for all objectives and want to see them to be executed	15
	Online survey	Dissatisfied with the survey design	10
	General support	Support for all challenges	7
	Challenge 2	Traffic flow includes flow of people/ improve traffic flow has a limit and should not be the primary focus	7
	General opposition	Too much emphasis on cycling - no more cycle lanes and narrow pavements and widening the roads	5
	Document	Specific things such as disabled access and parking, neighbouring towns, transition away from car ownership has not been mentioned sufficiently in the document.	4
	Follow-up	Great to have a follow-up with more quantified targets when time and funding allow	4
	Objectives	Objectives are not appealing	3
	Contradiction	Not realistic to improve traffic flow and safety at the same time/ improve traffic flow and rely on tourism	3
Scheme specific	Preston Village	Support for Renew Preston Village Campaign	31
	Beryl Bike	Expensive, no nearby bike bay, bike design is too big for some people	10
	A23 active travel scheme	Concern about Dyke Road/ Dyke Road drive layout/ complete safe cycle lanes along the road	4
	School transport	Not mention enough about school transport/ call for school team to do a plan	3

Themes	Sub-themes	Comments (top 10 for each theme)	No. of times raised
	Red routes	Support for more red routes	2
	Parking companies	High charges	2
Other	Council policy	Council policy can cause congestion (e.g. Valley Gardens, A259 pier roundabout)	20
	Funding	Make sure an even coverage of - city investment	4
	Vision	Be ambitious on making the city cleaner and more active	3

Table 3: Respondents' comments by themes

Organisational responses

A wide range of organisations provided comments, including public bodies, neighbouring local authority, internal council teams and local stakeholder groups and local businesses. Their key points are summarised by organisation below, in alphabetical order. Full comments are provided in Appendix C - Organisational responses.

Bricycles

- Include reducing car journeys as a specific objective.
- Ensure the Park & Ride scheme is effective by removing city centre parking and reallocating spaces for residents and active travel infrastructure.
- Promote active travel through safe and secure cycling options, accessible to children, low-income residents, and disabled people.
- Support a car-free city centre in key areas (Lanes and North Laine) to improve walkability.

Brighton & Hove Bus and Coach Company

- Highlighted congestion is the biggest issue, harming bus speeds, reliability, and fares; called for stronger bus priority.
- Welcomed red routes and service improvements but raised concern that active travel schemes/traffic lights can slow buses.
- Noted challenges of converting depots to EVs.
- Called for fully accessible bus infrastructure, improved night bus services, and quicker rollout of bus priority at traffic lights.

Brighton & Hove City Council – Air quality

- Raise concern that emissions and air quality not specifically mentioned in the priority order.
- Recommend consistent reference to ultra-low and zero throughout the plan.

Brighton & Hove City Council – Planning Policy

- Strongly support the objective of giving more people the choice of active travel to manage impacts of new developments.
- Emphasised strong links between Our City Transport Plan 2035 and City Plan 2041
- Look forward to continued close working as both plans evolve.

Brighton and Hove Cycling UK

- Called for road traffic reduction with a monitored Key Performance Indicators and a car-free city centre, warning that EVs alone are not enough to cut emissions or danger.
- Welcomed current and planned active travel schemes (e.g. Valley Gardens, A23, A259) but stressed the need for a fuller, safer cycle network and better maintenance of road surfaces.
- Concerned Park & Ride will not cut traffic without removal of city centre parking; suggested demand-management measures such as road user charging instead.
- Highlighted land-use planning (15-minute neighbourhoods) and government lobbying (e.g. to ban pavement parking) as key to a low-traffic future.
- Warned against over-prioritising roadbuilding under the new Mayoral Authority; urged focus on sustainable and cycling schemes.

Brighton and Hove Clarion Cycling Club

- Stressed that EVs still produce emissions and risk encouraging driving over walking/cycling.
- Called for citywide 20mph limits, car-free areas (particularly the city centre, North Laine and the Lanes), and a full network of safe, segregated cycle lanes.
- Highlighted the need for wider, clutter-free pavements, more play streets, and street trees to improve safety, accessibility, and attractiveness.
- Suggested Park & Ride will only succeed if linked to reduced city centre parking and repurposed spaces for residents, cycling and public realm improvements.

Brighton and Hove Older Peoples' Council

- Highlighted accessibility and isolation issues; many cannot rely on active travel
- Raised concern about long distances between bus stops, lack of seafront bus service and high parking charge.
- Stressed that reliance on online systems (ticketing, parking permits, bike hire) disadvantages older people.
- Supported healthier lifestyles and clean air but warned about unsafe pavements, shared space and the cost barriers of EVs.

Brighton Buswatch

- Highlighted the importance of bus infrastructure such as red routes, bus lanes and real time information systems.
- Argued bus priority identified as the single most important factor helping bus services.
- Suggested creating a bus priority plan (like LCWIP) and adding priority at all signals.
- Criticised the transport plan for underplaying the role of buses in the city's economy and carbon reduction, compared with walking/cycling.
- Concerned BSIP funding is focused on revenue (subsidies, fares) rather than capital improvements.
- Warned against relying on national averages (Carbon Playbook) which undervalue Brighton's bus network

British Regional Transport Association (BRTA)

- Proposed a series of local and regional rail network improvements, reopening, upgrades and new links.
- Called for more direct bus/rail services to key destinations including the South Downs and more buses on Sundays.
- Proposed concessionary bus passes for under-30s and under-65s to boost ridership.
- Supported retrofitting low-carbon engines to existing bus fleets and further tram/ light rail schemes.
- Called for better accessibility standards, level boarding, kerbs. Autism/ dementia consideration.

Bristol Estate Leaseholders and Tenants Association (BELTA)

- Highlighted accessibility challenges at Bristol Estate, where steep geography and limited bus services restrict residents' access to vital services such as GP surgeries.
- Raised concern about hospital access, stressing the importance of clear routes for emergency vehicles and the need for road design that are logical, consistent and do not unintentionally disadvantage other users.

CPRE Sussex, the countryside charity

- Welcomed active travel and public transport focus but says proposals are insufficiently bold.
- Called for stronger restrictions on private car use including ULEZ, reduced parking, space reallocation.
- Objected to Park and Ride, citing evidence it increases car use and harms countryside/urban fringe.
- Supported neighbourhood hubs and integrated policies that encourage modal shift.
- Highlighted need to protect countryside and green space when planning new schemes.

East Sussex County Council

- Supported initiatives to improve cross-boundary journeys between East Sussex and Brighton and Hove for residents, businesses and visitors, recognising Brighton's visitor economy and the importance of maintaining and enhancing good connectivity by all modes, including bus, rail, active travel and freight.
- Stressed that the movement of goods is as important as the movement of people, welcomed opportunities to work jointly on freight strategy.
- Expressed willingness to collaborate on cross-boundary active travel and public transport corridors, highlighting previous joint schemes such as the A250 bus lanes and Falmer-Woodingdean cycle route.
- Emphasised the need for an inclusive transport network supported by equalities impact assessment (EqIA) and health impact assessment (HIA).
- Supported an increase in public transport trips across the border but cautioned that Park & Ride proposals should not divert users from existing public transport services.
- Requested further details on EV charging delivery, including private sectors involvement, grid capacity and renewable energy integration.

East Sussex Fire and Rescue Service

- Highlighted the plan does not demonstrate a proportionate strategy to cope and protect the increase of cyclists BHCC are promoting and urged considerations of physical controls across the city road networks to safeguard vulnerable road users.
- Expressed willingness to collaborate with the council on managing risks of implementing infrastructure of EV chargepoints including increase in substation capacity, access to these risk areas, noting the importance of a community risk management plan to support a timely emergency response.
- Emphasised the need to educate public access chargepoint users on safe usage to reduce risks
- Highlighted two major risks associated with EV parking in multi-storey car parks – the structural challenge due to heavier EVs (risk of building collapse) and the increased fire hazard as EVs are more volatile and thermal runaway incidents are harder to manage.

ELEVATE research team

- Expressed willingness to submit research evidence including Brighton & Hove resident feedback relevant to the consultation.

- Highlighted findings from the study showing that e-cargo bikes are a realistic and desirable form of mobility option, with the potential to reduce car use and associated emissions.

Historic England

- Supported for solutions and programmes that minimise the impacts of transport on the historic environment, heritage and townscape, delivering long-term environmental benefits.
- Emphasised integration of transport solutions into streetscape and the public realm, particularly in historically sensitive locations such as conservation areas and the setting of listed buildings.

Hove Civic Society

- Raised concerns about “land grab” from larger vehicles, including EVs, and loss of green space through paving drives.
- Proposed tiered parking fees by vehicle size and landscaping one space for each EV charger.
- Called for a better balance of investment in walking/cycling vs cars, including wider pavements in inner areas.
- Suggested greening all new highway works (trees, rain gardens, biodiversity net gain funding).
- Requested explicit recognition of Hove Station Neighbourhood Plan in the transport plan.

Living Streets Brighton and Hove

- Welcomed health and inclusivity aims but says the plan lacks detail on improving walkability.
- Called for a clear strategy to tackle pavement obstructions (bins, guard rails, EV boxes, signage, parking).
- Proposed removing all pedestrian guard railings, citing safety benefits.
- Concerned pavement maintenance receives far less funding than roads, despite new government allocations.
- Called for a new city-wide 20mph speed limit review and stronger enforcement.
- Welcomed proposed walkability and accessibility improvements in the city centre.

Metamorphosis Art Group and The Flamenco and Spanish Group

- Most people cannot afford electric cars, so widespread on-street chargers would be underused, create trip hazards, and should only be installed in purpose-built, out-of-town locations.
- Driverless cars are unlikely to be widely adopted, making investment unnecessary.
- Traffic used to flow more smoothly before 1980s changes (e.g. two-way side roads, no bus contraflow); current road layouts and bus lanes are seen as causing congestion and bottlenecks.
- Successive road planning decisions are viewed as worsening problems instead of addressing underlying issues.
- The council should avoid “vanity projects” and focus on maintaining a clean, reliable, and functional road and transport system.

National Highways

- Concerned about the safety, reliability, and operational efficiency of the Strategic Road Network (SRN), particularly the A27 and A23.
- Emphasised that the plan should reflect and align with DfT Circular 01/2022 – Strategic Road Network and the Delivery of Sustainable Development and the National Planning Policy Framework (NPPF), which set out the Government's policy framework for the SRN and emphasise a vision-led approach to development that reduces traffic impacts by promoting sustainable and active travel and supporting internalised trips in larger developments.
- The Government's Road Investment Strategy (RIS) sets investment priorities for the SRN. RIS2 concluded in March 2025. RIS3 will cover 2026–2031, with an Interim Settlement (2025/26) confirming that the focus will be on maintenance and renewal of the existing network. Not all schemes in the RIS2 pipeline will progress into RIS3.
- Welcomed the plan's promotion of sustainable and active travel to help reduce car dependency and ease pressure on strategic routes such as the A23 and A27.

The Carers Centre for Brighton and Hove

- Emphasised that when targeting accessible, inclusive transport, it is important to include people whose mobility is so limited that they require door-to-door accessibility.

Transport Action Network

- Supports LTP's overall vision but missing a Vision Zero approach to road safety and weak on climate adaptation (shade, SUDS, parking removal).
- Lacks strong demand management to reduce car use; criticism of park & ride for harming buses/rail and the South Downs.
- Too little focus on cycling, e-bikes, and mobility scooters (parking, charging, security).
- Pavement and path maintenance/accessibility issues (widths, kerbs, clutter, seasonal hazards); calls for a review and higher standards.
- Needs better rail improvements (e.g., Moulsecoomb, West Coastway), stronger support for active travel, and caution over autonomous vehicles.

Transport for South East

- Welcomed the strong alignment between the Our City Transport Plan 2035 and TfSE's Transport Strategy and Strategic Investment Plan (SIP), particularly in relation to decarbonisation, inclusion, and sustainable growth.
- Shared a vision for a low-carbon, inclusive and accessible transport system that enhances quality of life and supports sustainable economic growth.
- Adopted consistent approach in planning closely mirrors TfSE's approach to integrated, evidence-based transport planning.
- Appreciated the Plan's explicit recognition of the regional role of the sub-national transport body and the inclusion of the TfSE Transport Strategy and SIP to demonstrate policy alignment.
- Suggested the plan could further align with the SIP by referencing additional regionally significant schemes, such as the A27 East of Lewes–Polegate improvements, the West Coastway Strategic Study, and Brighton Station capacity enhancements.
- Encouraged continued collaboration to ensure Brighton & Hove's proposals remain fully integrated within the wider South East investment framework and contribute to delivering a resilient, inclusive, and net-zero transport system for the region.

University of Brighton

- University of Brighton supports the identified challenges.
- Accessibility at Moulsecoomb station remains a significant barrier for wheelchair users and those with mobility difficulties.
- Challenge 5 (cycling/active travel) is important, and red routes have had a positive impact.
- Cost and convenience are the main barriers to sustainable transport uptake, with more emphasis needed on reducing public transport costs and improving facilities.

Renew Preston Village Campaign

- Renew Preston Village, backed by 1,500 residents, 19 businesses, and community groups, seeks inclusion in the City Transport Plan 2035 to turn Preston Village into a neighbourhood mobility hub.
- The A23 divides the village, leaving it traffic-dominated, unsafe for walking/cycling, flood-prone, and unattractive despite its heritage and role as a city gateway.
- Proposals (8 priorities):

1. **Flood resilience** – Install rain gardens/SUDs to address repeat flooding.
2. **Crossings** – Safer east–west toucan crossings and north–south raised junctions.
3. **Active travel hub** – Cycle lanes, wider pavements, bike hire, bus stops, and rail links.
4. **Air & noise reduction** – Trees, landscaping, narrower carriageways for calmer traffic.
5. **Economic growth** – Support shops, attract investment, connect heritage and events.
6. **Public realm** – Heritage-sensitive upgrades with greenery to improve pride and safety.
7. **Community cohesion** – Create welcoming, people-centred communal space.
8. **Events infrastructure** – Improve capacity for major Preston Park events and capture local spend.

About you

Q How are you responding to this survey?

Many of the respondents were residents, 10% work or study here, 6% represented a business or organisation, 3% reported as a visitor and 2% were an owner of a business.

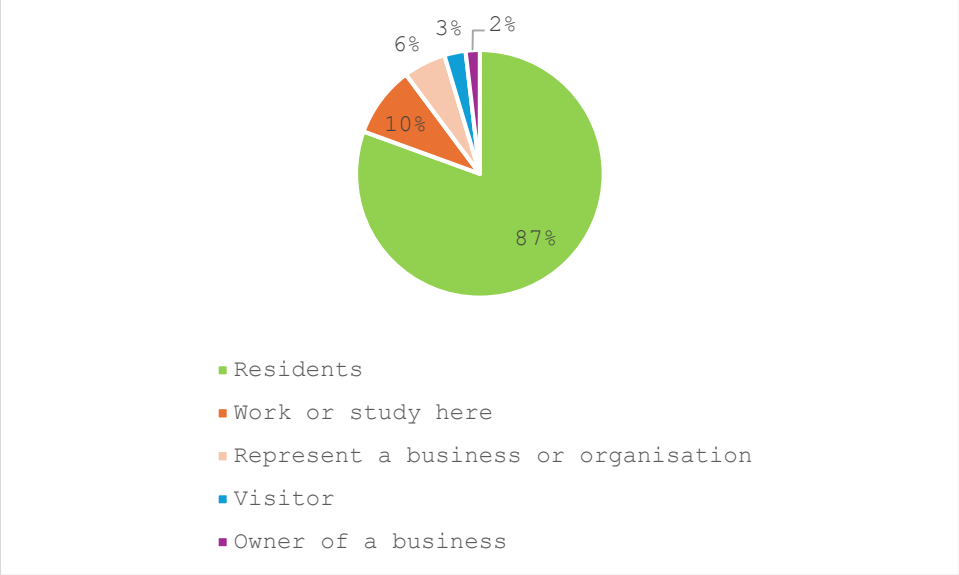


Figure 5: Results of question: How are you responding to this survey?

Q How did you hear about this consultation?

Nearly one-third of respondents heard about this consultation through social media. Around 10% heard by word of mouth. Smaller proportions heard through the council website, email or selected 'other'. Six percent heard through local press, 4% from an information leaflet and 2% because they attended an event.

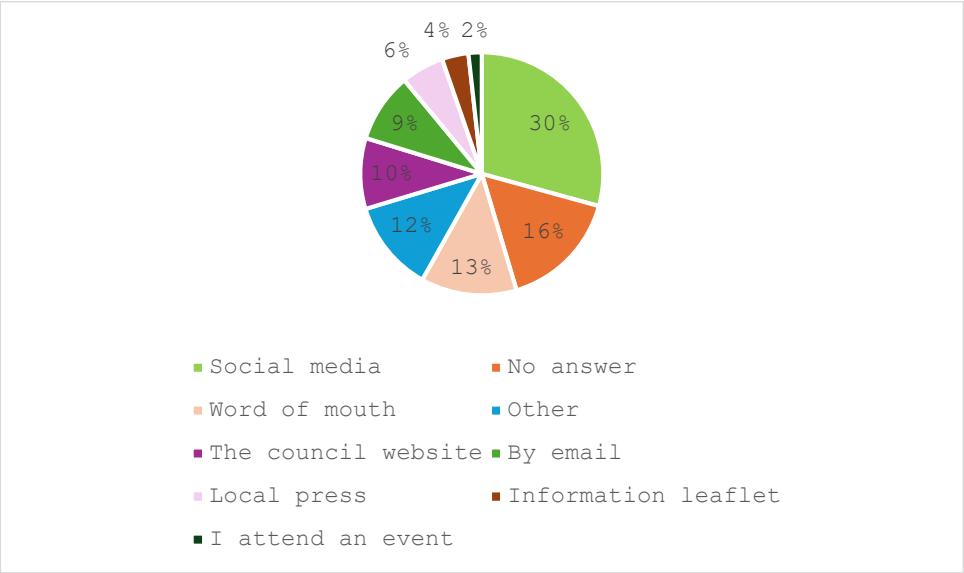


Figure 6: Results of question: How did you hear about this consultation?

Postcode map

Respondents were invited to provide postcode on an optional basis. These postcodes were categorised by areas and the number of responses in each area was recorded and illustrated indicatively in **Error! Reference source not found.**. A small number of postcodes fell outside the map area, which are likely to have be provided by visitors.

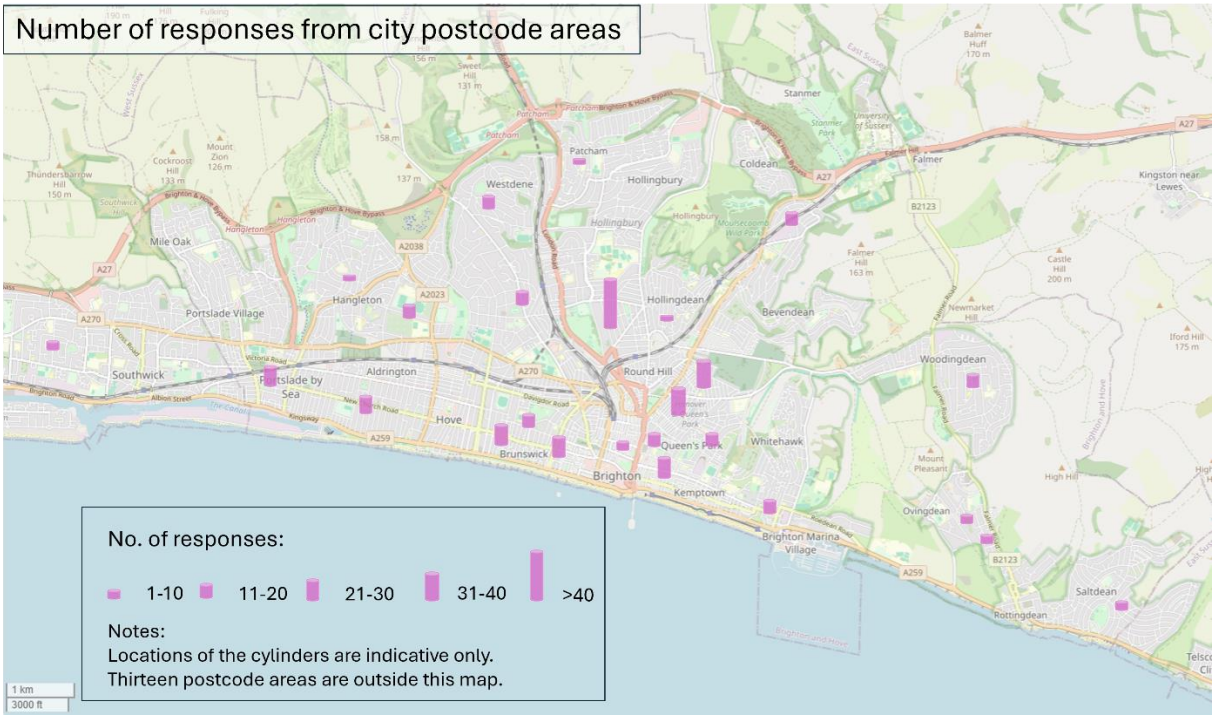


Figure 7: Postcode map

Equalities information

Q What gender are you?

Around one-third of respondents identified as female and one-third as male, while 5% identified as non-binary and 1% selected ‘other’.

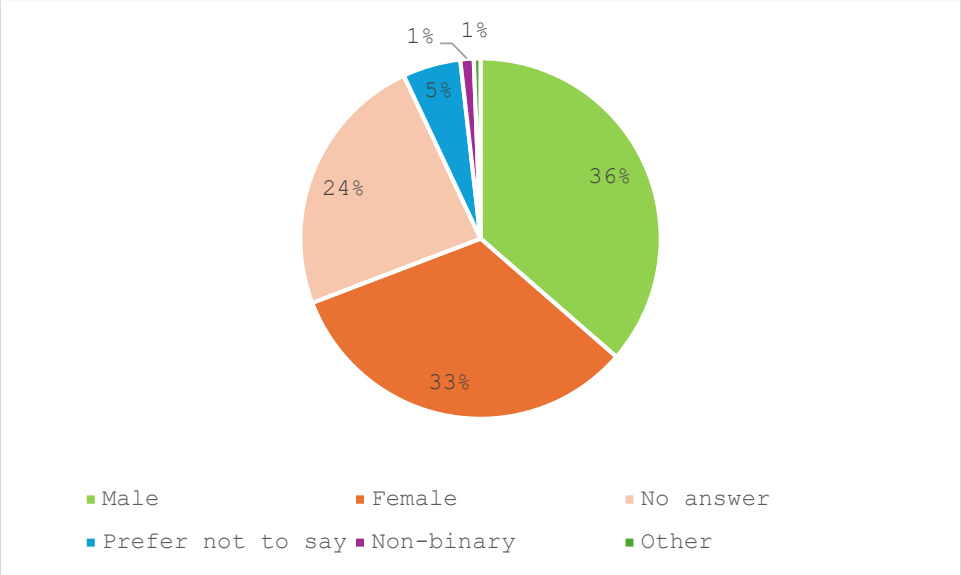


Figure 8: Results of question: What gender are you?

Q Do you identify as the sex you were assigned at birth?

Sixty-nine percent of the respondents identified with the sex they were assigned at birth, while 1% did not.

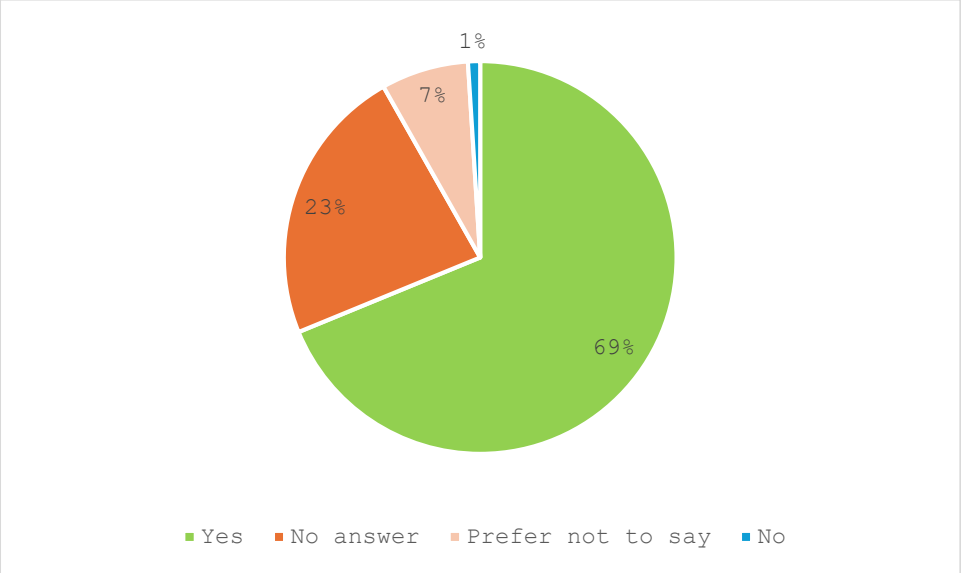


Figure 9: Results of question: Do you identify as the sex you were assigned at birth?

Q What is your age?

The age of respondents is broadly evenly distributed between 35 and 65+ ranging from 15%-17%. Younger adults were less represented with 9% aged 25-34 and only 3% aged 18-24.

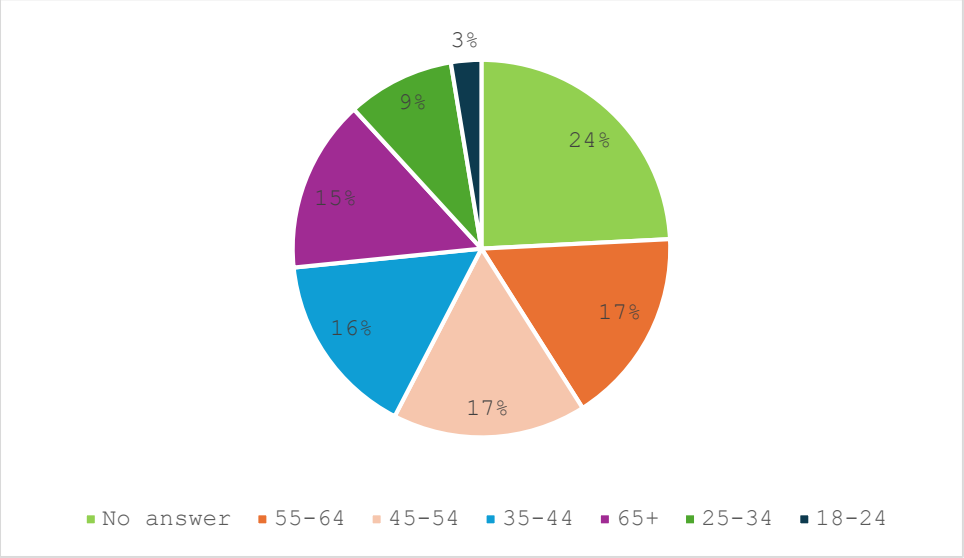


Figure 10: Results of question: What is your age?

Q What is your ethnic group?

Around 64% of respondents are white. Ethnic groups other than white are less represented with a total of around 5%.

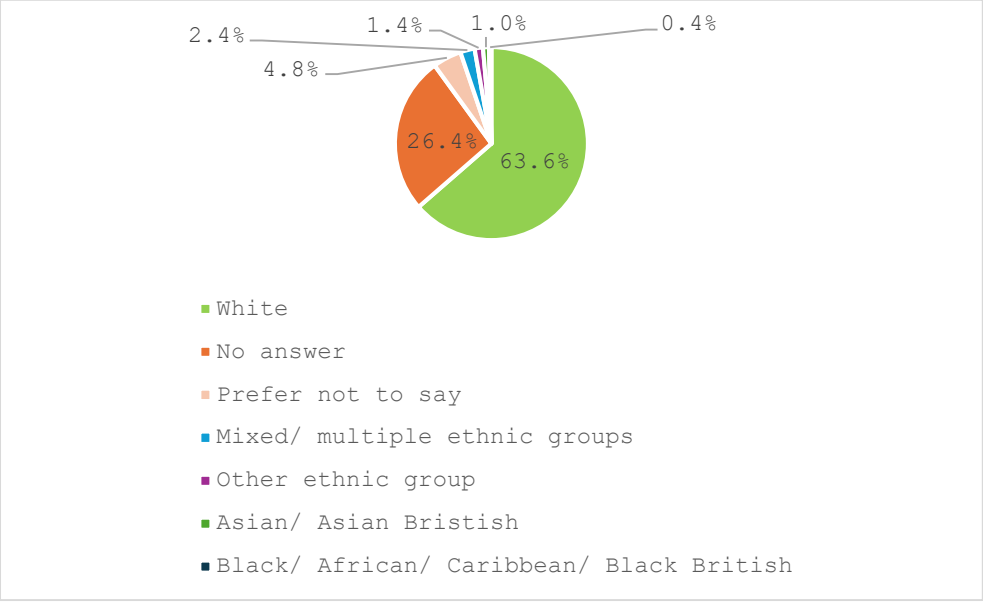


Figure 11: Results of question: What is your ethnic group?

Q Do you have a health problem or disability?

There are 17% of respondents have a lot or a little health problem or disability.

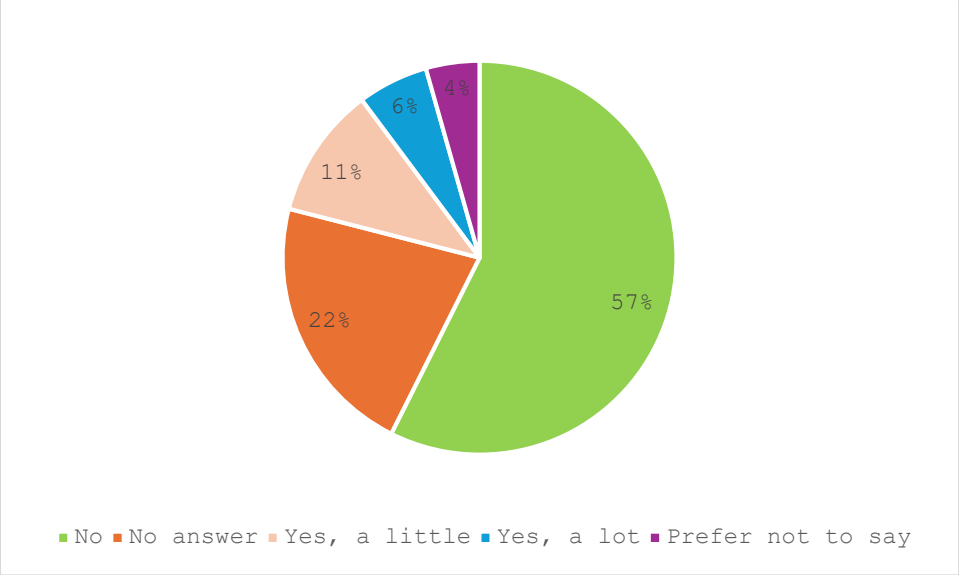


Figure 12: Results of question: Do you have a health problem or disability?

Q Your condition(s)

Among whom responded ‘Yes, a lot’ and ‘Yes, a little’ to the health condition question, they were asked to tell their condition. They could select more than one impairment that apply to them.

Two-thirds of the respondents reported having a physical impairment, one-third reported a long-standing illness, one-quarter reported a mental health condition, 17% were on autistic spectrum and 10% reported a sensory impairment. In addition, 6% reported having a developmental condition and 6% a learning disability/ difficulty.

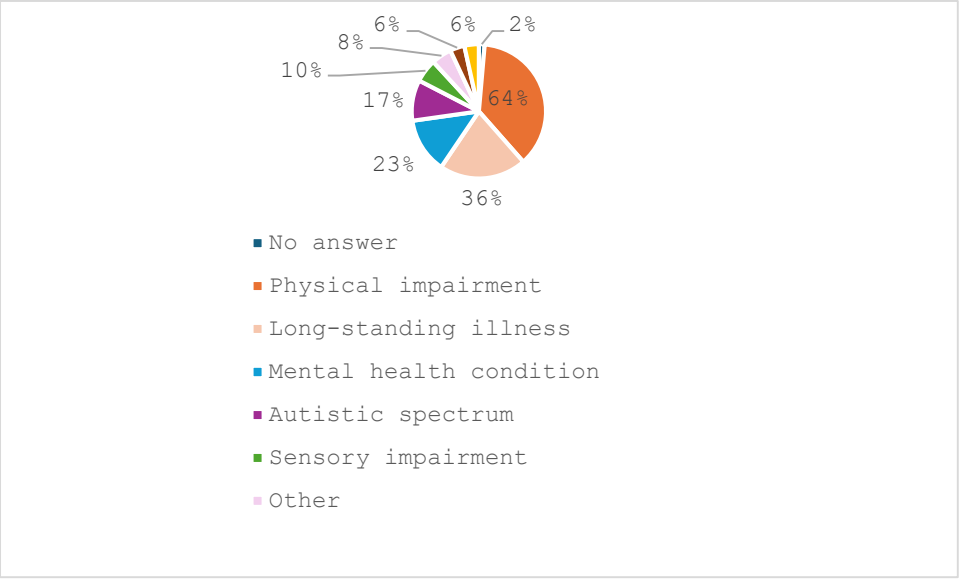


Figure 13: Results of question: Your condition(s)

4 Public exhibition feedback

4.1 Summary

A public exhibition was in place at the Foyer Gallery in Jubilee Library for a week between 30 June and 6 July 2025. Members of the public were able to view information about the consultation, take information away and leave comments, in response to three key questions, by sticking post-it notes on the wall of the exhibition. Figure 14 shows the exhibition with a close up of the ‘Have your say’ wall.



Figure 14: Public exhibition in the Foyer Gallery at Jubilee Library with the ‘Have your Say’ wall

During the exhibition week, a drop-in session was held at Jubilee Library to engage people in conversation about the consultation. For those unable to stop and talk, officers handed out postcards inviting people to go online to have their say (around 100 were distributed during the 2-hour session).

4.2 Feedback on the 'Have your say' wall

Comments from the exhibition were based around three key questions. Responses have been sorted into themes which are summarised below.

Question 1 – How do you usually travel around the city, and what works well (or not so well) about it?

Mode of transport for getting around the city	Number of times mentioned
Walking	11
Cycling	6
Taking buses	13
Driving	2

Table 4: Results of Question 1

Themes	Comments	Number of comments
Walking	Walking is good exercise and reliable	2
	Narrow pavements	1
	Unsafe walking environment	1
	Too hot to walk in summer	1
	Satisfied with green scenery	1
	Car free city centre	1
	Total	**7**
Cycling	Cycling areas in Valley Gardens and Preston Park much improved	2
	Gaps in the cycling routes and bad design are making cycling dangerous	2
	Greater awareness from pedestrians to stay out of the cycle lanes is needed	2
	More cycle lanes needed especially to link to the seafront	2
	The behaviour of car divers makes cycling dangerous	1
	Cycling should be a priority in our transport plan as it is healthy	1
	Total	**10**
Bus	Satisfied with bus services – lots of bus routes, comfortable, Wi-Fi, frequent, nice bus drivers	5
	Cheaper bus services	2
	Dissatisfied with bus services - cleanliness, crowded	2
	No air conditioning on buses	2
	Too many buses through city centre and long waiting times	2
	Make window open on Big Lemon	1
	More digital timetable boards on more bus stops as not all people have a phone	1
	Total	**15**

Themes	Comments	Number of comments
Congestion	Busy roads - congestion at Churchill Square, North Road, London Road	2
	Congestion zone in city centre (perks if car share)	1
	Total	**3**
Enforcement	Vans not abiding by double red lines on Lewes Road	1
	Total	**1**
Roads and pavements	Some roads and cycle lanes are very bumpy	1
	Total	**1**
Other public transport	Call for tram	1
	Total	**1**

Table 5: Respondents' comments for Question 1 by themes

Question 2 – Are there any changes that would make your daily journeys easier or better?

Themes	Comments	Number of times mentioned
Walking	More sitting areas for longer walking journeys	2
	More safe crossings	1
	Wider pavements	1
	Dropped kerbs at crossings	1
	Total	**5**
Cycling	More protected cycle lanes	2
	Car drivers to respect cyclists	2
	Better and more joined up cycle network	2
	More safe bike parking	1
	Public subsidy of Beryl Bike scheme	1
	Total	**8**
Bus	Cheaper bus services	3
	More frequent and reliable buses	2
	Air conditioning on buses	1
	Training for bus drivers on understanding deaf community	1
	Satisfied with bus services and drivers	1
	Accessibility seating at bus stops	1
	Free for students for bus services	1
	Total	**10**
Enforcement	Speed cameras on residential roads	1
	Total	**1**
Restriction	More car free areas - e.g. only public transport on North Road	1
	Total	**1**

Table 6: Respondents' comments for Question 2 by themes

Question 3 – If you could improve one thing about transport in your area, what would it be?

Themes	Comments	Number of times mentioned
Cycling	Better and more joined up cycle network	2
	More safe cycle parking	1
	Total	**3**
Bus	More direct routes	1
	Better inclusivity including inclusive drivers	1
	Working electronic timetables	1
	Cheaper bus services	2
	More zero emission buses	1
	Total	**6**
Congestion	Congestion charge during weekends and summer	1
	Total	**1**
Enforcement	Speed bumps or cameras on residential roads	2
	Total	**2**
Other public transport	Call for tram	1
	Total	**1**
Integrated transport system	Support for Park & Ride	1
	Total	**1**

Table 7: Respondents' comments for Question 3 by themes

4.3 Feedback received in drop-in sessions

Some residents attended the drop-in sessions and talked about their feedback on the city's transport. Table 8 summarises their feedback and suggestions.

Themes	Comments
Cycling	More protected cycle lanes to encourage cycling.
	Link up the cycle network – current gaps discourage use.
Public transport	Timetables: buses on same route often arrive together, reducing efficiency.
	Western Road/ North Street: suggested spreading bus stops to other roads to reduce bottlenecks.
	Direct connections: Rottingdean ↔ Universities (Falmer) needed via Falmer Road.
	Saltdean issues: - Low usage and frequency (routes 27, 47). - Roadworks and parked vehicles disrupt service.
	General Suggestions: - Smaller buses during low-demand periods. - Circular routes linking neighbourhoods to main corridors. - App-based demand-responsive transport to improve connectivity.
Congestion	Concerns from A259 Action Group about congestion.

Themes	Comments
	A259 traffic congestion causes delays and poor air quality.
	A259/High Street junction, Rottingdean: tight turning radius for buses, forcing them into adjacent lanes.
	Suggestion: optimise traffic signals (e.g. with SCOOT) to improve flow and reduce idling emissions.
Parking	Insufficient disabled parking
	Safety concern: disabled parking adjacent to cycle lanes – unsafe when opening doors as cyclists don't slow down.
Enforcement	Speeding on 20mph roads, but no enforcement.
Environment	Suggestion: biogas-powered vehicles as an alternative to electric vehicles:
	- Lower-cost conversions of existing fuel buses.
	- EVs criticised for high production and end-of-life carbon footprint.
	Develop a streetscape design code for transport projects and maintenance to improve quality of the public realm.

Note that they are all one-off comments.

Table 8: Feedback from residents

5 Workshop/ meeting feedback

5.1 Summary

Five workshops were held in five schools listed below and also in Annex 1 – List of events, workshops and poster distribution in June 2025. These took place before the public consultation started to better match with school schedules to avoid exams and before their end of term. In total, 71 students from years 7 to 10 were engaged. In the workshops, they were asked if they feel safe to getting around Brighton alone, and to vote for the greatest challenge they think the city faces and the objective they think is the most important. There were discussion sessions for them to raise questions and reflect their concerns and needs. The workshops took place at:

- Cardinal Newman Catholic School
- Brighton Aldridge Community Academy (BACA)
- Portslade Aldridge Community Academy (PACA)
- Longhill High School
- Dorothy Stringer School

These five schools were chosen because of their catchment areas: Cardinal Newman is a large faith school with a wide catchment; BACA is located to the north of the city, PACA to the west, Longhill to the east and Dorothy Stringer is relatively close to the city centre. Together, students from these schools were able to provide feedback that reflected concerns and needs from across different parts of the city.

5.2 Feedback

Most students felt safe to get around the city alone, but they also mentioned it would depend on areas and time of the day. For examples, they felt less safe getting around in the city centre, London Road and when it is dark.

The greatest challenge they thought the city faces is Challenge 1: Enabling people to live safer, healthier and more active lives and the most important objective went to Objective 3: deliver a safe, inclusive and integrated transport system.

Feedback from these school workshops is also presented by themes in Table 9. Where pupils have made suggestions as to how things could be improved, we have included these within the table.

Themes	Comments	Number of times mentioned
Walking & Cycling	Lack of safety for cyclists due to traffic	8
	Unsafe walking conditions – lack of lighting or poor road visibility	8
	Pavements too narrow and crowded	4
	Cycle lanes too close to roads	2
	Calls for better active travel choices and public spaces	2
	Feels unsafe crossing the road	2
	Total	**23**
	Suggested improvements:	
	Safer cycling infrastructure - better marked and separated cycle lanes	5
	Encourage people to walk or cycle for short trips to reduce traffic on roads	2
	More secure bike storage and cheaper rental bikes	1
	Prioritise pedestrians and cyclists	1
	Total	**9**
Public transport	Bus frequency & reliability - not matching school timetables, long waits, delays, buses not turning up	23
	Affordability of fares - too expensive for regular use	20
	Passenger safety and behaviour on buses - unsafe or uncomfortable environments	8
	Accessibility - difficult for older people, children, and disabled passengers	5
	Needing multiple buses to reach destinations	3
	Bus driver behaviour - rudeness, inconsistent fare charges	3
	Crowded buses or trains	3
	Tree branches brushing buses	2
	Total	**67**
	Suggested improvements:	

Themes	Comments	Number of times mentioned
	Free or cheaper bus fares or expanding free bus ID eligibility	5
	Increased frequency and route variety	3
	Improve safety and atmosphere on buses	3
	Better real-time tracking/ more real-time information screens needed	3
	Total	**13**
Congestion	Congestion	11
	Narrow two-way roads increasing congestion	1
	Road works impacting journey times	1
	Total	**13**
Roads and pavements	Poor road surface is a major problem - potholes	27
	Uneven pavements	4
	Total	**31**
Electric vehicles	Insufficient EV charge points, especially for those without driveways	1
	Confusion about how e-bikes work	1
	Total	**2**
Technology	Support for smart technology to improve transport planning and operations	7
	Total	**7**
Parking	Expensive parking costs	8
	More car parking in busy places, e.g. London Road	1
	Total	**9**
Inclusivity and accessibility	Support transport to be inclusive and accessible for all	13
	Total	**13**
Environment	Concern about CO□ emissions and environmental impact	7
	Total	**7**

Table 9 Students' feedback by themes

Additionally, officers attended six meetings during the consultation to give an overview of the Our City Transport Plan 2035 and collect feedback from the stakeholders including disabled people from Possibility People - GIG. Full details of meetings attended and focus groups held are detailed in Annex 1 – List of events, workshops and poster distribution.

Feedback from these meetings is presented by themes in Table 10.

Themes	Groups	Comments
Walking	Transport Partnership	Make good use of public rights of way network
	Destination Experience Group	Better city centre walkability as there are too many cars

Themes	Groups	Comments
	Local Access Forum	Street clutter including pavement parking, signage, recycling bins, and EV chargepoints was highlighted as a major barrier for pedestrians, especially those with buggies or wheelchairs.
		Pavement parking enforcement is key to ensuring safe and accessible pedestrian spaces.
	Possibility People - GIG	Wider pavement by narrowing streets for better accessibility for disabled people.
	Healthy Weight Programme Board	Looking to get people out to the South Downs, etc to enjoy the countryside and all its benefits.
Cycling	Local Access Forum	The cycle hanger scheme is popular, but waiting times are long, indicating strong demand.
		More safe, well-located, and well-lit cycle parking is needed, ideally with CCTV, especially important for women and others concerned about safety.
		Criticised capital allocated for delivering Public Right of Way Improvement Plan which is seen as insufficient.
	Possibility People - GIG	People with sight loss feel unsafe at around floating bus stops and unclear cycle lanes.
		At Preston Park, cyclists do not stop at zebra crossings, posing risks to pedestrians.
		Dotted crossings unsafe for people with learning difficulties.
		Suggestions: add clearer markings or dedicated crossings for cycle lanes, and better education for cyclists and stricter use of cycle lanes.
Public transport	Transport Partnership	Priority for buses
	Destination Experience Group	The focus needs to be on getting around the city by public transport, bus and train as Brighton is too hilly for cycling.
	Local Access Forum	Bus frequency and affordability were highlighted as priorities.
		Higher bus fare and lower parking fees in the city discourage shift to public transport.
	Possibility People - GIG	Long gaps between bus stops are challenging, especially in areas like between Norfolk Square and Waitrose, or from The Pavilion to St Peter's Church.
		Lack of a stop at Clarence Square.
		Newer buses may not accommodate all wheelchair sizes, and drivers often don't wait at the raised parts of stops.

Themes	Groups	Comments
		Issues with real-time tracking for certain services (e.g. Compass buses in Patcham) makes journey planning difficult.
Congestion	Transport Partnership	Road traffic reduction
	Destination Experience Group	Gridlock in the city centre, especially during events. Call for a strategic plan to get rid of cars, so people would get on buses or active travel.
		Suggestion: better use of wayfinding and digital messaging/ intelligence to improve traffic flow.
	Local Access Forum	Eastern section of the A259 was missing from the plan. Call for improvement on traffic congestion.
Roads and pavements	Possibility People - GIG	Street clutter (like cycle parking or café/restaurants furniture) create barriers for those with visual impairments who rely on a kerb or building lines to navigate.
		Uneven surfaces, steep cambers (e.g. Gardner Street), and potholes on pavements are dangerous for wheelchair users. It also requires expensive maintenance of chair outside of the usual cycle regularly
		Wheelchair users end up in the road owing to pavement congestion on some streets such and Ship Street.
		The incline at Eye Hospital makes access difficult for the mobility impaired, though benefitting the visually impaired.
Electric vehicles	Local Access Forum	Electric vehicles still produce emissions from tyre and brake wear.
Parking	Local Access Forum	Consider parking charges based on vehicle weight to discourage excessive car use.
	Possibility People - GIG	Require accessible parking spaces near GP, workplaces or shops, so they can be able to work and live independently. End of twinning blue badges with yellow lines and red routes created issues for people who are disabled car users.
Restriction	Possibility People - GIG Action Group	Wheelchair users reported taxi drivers avoiding pickups due to their perception it is difficult to stop or turnaround on red routes.
Shared space	Possibility People - GIG	Shared spaces rely too much on social understanding; some users (cyclists, e-scooter riders) don't yield to pedestrians.
		Large delivery vehicles at Middle Street make it uncomfortable for pedestrians to share space.
Our City Transport Plan 2035 document	Transport Partnership	Traffic includes non-motorised vehicles eg cycles and also pedestrians.
	Possibility People - GIG Action Group	The plan seems to prioritise cycling.

Themes	Groups	Comments
	Local Access Forum	Members believed tackling challenge 1 could help address several of the other challenges too.
		Challenge 1 deserves more detailed coverage within the plan.
		Walking should be considered part of the overall traffic flow.
		The plan is still too focused on vehicles.
		Referenced Gear Change: a bold version for cycling and walking, the national strategy for walking and cycling. Urged the council to adopt a similarly bold approach.
		While all six objectives were supported, attendees recognised that delivery depends heavily on funding. They hoped that more of the plan could be implemented beyond statutory duties.
Valley Gardens	Destination Experience Group	Valley Gardens is great. The council needs to ensure it is maintained and remains a welcoming space.
		Valley Gardens focuses too heavily on cyclists.
City gateways and connectivity	Destination Experience Group	Improve access into the city for visitors – both public and private transport.
		Support for a good quality P&R facility which would be good for visitor economy.
		Improve gateways to the city both visually and in terms of functionally with gateways working as smooth transition points into the city. For example, coach and train station.
		Better east-west connectivity.
Environment	Local Access Forum	Attendees also raised concerns about the growing number of large SUVs, which take up more space and create more emissions.
Other	Possibility People - GIG	Conditions of the roads for blind and partially sighted people, flat surfaces useful for mobility needs are difficult for people with vision impairments owing to use of lips and raised curbs to navigate.
		Concerns over a lack of learning from previous projects, like Elder Place, where accessible planning was not fully considered.
		Inconsistent standards across council departments when it comes to accessibility.
		Consultation processes are often inaccessible, lack of notice and insufficient work done to survey opinions from people with learning difficulties — Your Voice surveys are not enough, and more time and better formats are needed.

Note: no comments were received from the Taxi Forum for this consultation

Table 10: Stakeholder meetings' feedback by groups and themes

5.3 Survey results from respondents with health issues

83 respondents reported that their day-to-day activities are limited by a health problem or disability lasting, or expected to last, at least 12 months. Their responses were extracted for analysis to compare with the overall results in Section 4.2.

Travel habits

Q What mode of travel do you mostly use different types of trips?

- Commuting to work: 46% said not applicable. Among the rest, 18% use car, 12% use train, 8% walk, 8% use bus and 5% cycle.
- Education: 79% said not applicable. Of the remainder, 8% walk, around 5% use car, 3% cycle; and 2% travel by bus and train each.
- Shopping: 30% use bus, 28% walk, 25% travel by car and 10% cycle.
- Leisure: Walking is 30%, but more respondents cycle (17%), while bus and car use are 23% and 20% respectively.
- Visit the city: Walking and taking bus are similar to shopping trips, 13% use car and 12% cycle.
- Other modes (Taxi or private hire vehicle, mobility scooter or wheelchair): each account for around 1%-3% across all trip purposes with no one takes taxi or private hire vehicle to school and shopping and no one uses motorbike or moped for all trip purposes.

Compared with the results from Section 4.2, there are slightly higher proportion of respondents reported they are not studying or working. In general, they use more car. Proportion who walk for education and visiting the city is similar as well as cycling for visiting the city.

Transport challenges

Q Do you agree or disagree that these 5 challenges are what we should focus our resources on tackling?

Figure 15**Error! Reference source not found.** shows the percentage of respondents who selected ‘strongly agree’ or ‘agree’ with the identified transport challenges. Similar to the results in Section 4.2, at least 70% of respondents expressed agreement across all key challenges, but the ranking of the challenges is different. Challenge 4 instead of Challenge 1 received the strongest support with around 84% of respondents in agreement. Challenge 2 instead of Challenge 3 received the least support.

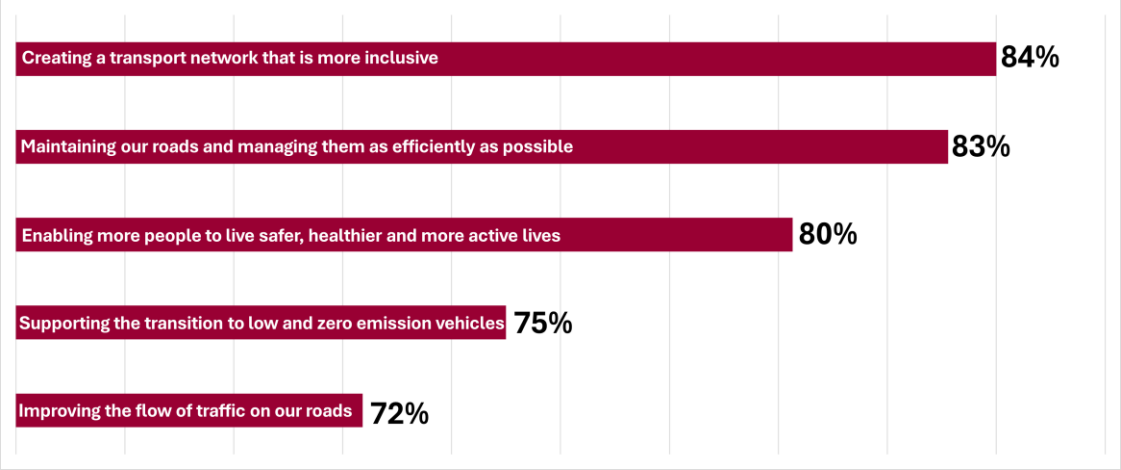


Figure 15: Percentage of respondents who selected 'strongly agree' or 'agree' with the identified transport challenges

Transport objectives

Q Do you agree or disagree that these objectives will address the challenges facing the city?

Figure 16Figure 16 shows the percentage of respondents who selected 'strongly agree' or 'agree' with the proposed objectives. The results are broadly consistent in term of ranking to those in Section 4.2, with over half of the respondents expressed agreement across Objective 1 to 5. Objective 4 received the strong support with around 78% of respondents in agreement while Objective 6 received the least support with 47% of respondents in agreement and around 26% of respondents expressed neither agree or disagree. The only different in ranking compared with Section 4.2 is between Objective 1 and 3: here, Objective 3 is ranked third and Objective 1 is ranked fourth, whereas their positions were reversed in Section 4.2.

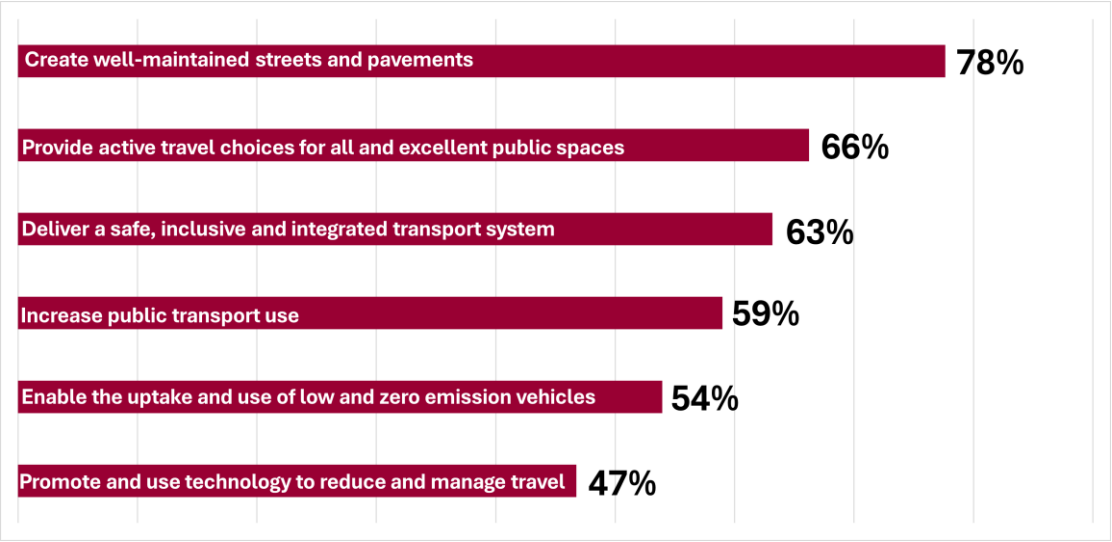


Figure 16: Percentage of respondents who selected 'strongly agree' or 'agree' with the proposed objectives

Project types

Q Please rank the project types below in order of importance to you.

The ranking of the seven project types is presented below. Similar to the results in Section 4.2, *Subsiding public transport to make it more affordable* receiving the strongest support while *Installing electric vehicle chargepoints* receiving the least support. The ranking between 2 and 5 are slightly different from those in Section 4.2.

		Average Score
1.	**Subsidising public transport to make it more affordable**	3.0
2.	**Maintenance of our roads and pavements**	3.4
3.	**Supporting and encouraging residents, visitors and businesses to use public transport and active travel**	3.9
4.	**Improving the accessibility of our streets**	4.0
5.	**Improving safety with new crossings for pedestrians, targeted improvements at junctions and outside schools**	4.1
6.	**Providing local transport hubs where a range of transport modes can be accessed**	4.3
7.	**Installing electric vehicle chargepoints**	5.4

Table 11: Ranking of project types

The average scores range from 3.0 to 5.4 which is relatively wide, suggesting that respondents expressed strong differences in their priorities across the project types.

Major schemes

Q Please rank the below major schemes in order of importance to you.

Similar to project types, the ranking of the six major schemes with the average score shown alongside each type.

		Average Score
1.	**Improving the look and feel of the city centre to make it more pedestrian friendly**	3.1
2.	**Improving bus journeys times in the city through bus lanes and red routes**	3.3
3.	**Improving priority routes for active travel (walking, wheeling and cycling)**	3.3

4.	**Sussex Coast Mass Rapid Transit – an express bus or tram that provides quicker connections between Brighton & Hove and other nearby coastal towns**	3.7
5.	**Improving to access the city centre**	3.8
6.	**New transport hubs at the city's edge offering Park & Ride, EV charging, vehicle hire and help reduce city truck traffic**	3.8

Table 12: Ranking of major schemes

Among the six major schemes, Improving the look and feel of the city centre to make it more pedestrian friendly received the strongest support instead of Improving priority routes for active travel (walking, wheeling and cycling) compared with Section 4.2. Again, new transport hubs at the city's edge offering Park & Ride, EV charging, vehicle hire and help reduce city truck traffic received the lease support.

Compare with the average scores of project types, the variation in the scores of major schemes is smaller ranging from 3.1 to 3.8, indicating that respondents viewed all six major schemes as having relatively similar importance.

From the above results, respondents with health issues broadly shared the same views as those in Section 4.2. The slight differences are that they placed higher priority on creating a more inclusive transport system and making the city centre more pedestrian friendly.

Written responses

Some of the comments from disabled people reflected the same views as the wider public, such as concerns about the affordability of public transport, traffic congestion, the need to reduce vehicle numbers, calls for Park & Ride and a more reliable public transport system (e.g. trams), high parking costs, the need for more buses and routes, and greater provision for pedestrianisation and safer cycle networks.

Specific concerns were raised about insufficient disabled access and parking, with some noting that additional double yellow lines and red routes make the city less accessible. Some felt very strongly that for certain groups, such as disabled people, tradespeople and social workers, active travel and public transport are not accessible for everyone. Some also highlighted barriers related to digital exclusion, noting that not everyone has a phone or the skills to use one, which makes parking or accessing other transport options more difficult.

5.4 Youth survey results

Apart from the school workshops held to engage with young people, a youth survey was also created and carried out using 'Your Voice' for gathering feedback from those aged 10 to 18. This survey was promoted during the workshops and distributed more widely through emails to schools across the city. A few schools also

supported by featuring the survey in their newsletters. 29 responses were received in Your Voice.

Travel habits

Respondents were asked about their travel habits before moving onto questions specific to the transport plan.

Q Tell us how happy or unhappy you feel about traveling on your own without an adult.

- Walk: 0% said not applicable. 77% of the respondents selected ‘Very happy’ and ‘Happy’.
- Bus: 14% said not applicable. Of the remainder, 50% selected ‘Very happy’ and ‘Happy’, 21% said ‘OK’ and 15% reported they were ‘Unhappy’ and ‘Very unhappy’ taking bus on their own.
- Cycle: 44% said not applicable. Among the rest, 32% were ‘Very happy’ and ‘Happy’, 8% said ‘OK’ and 16% were ‘Unhappy’.
- Scooter: Two-thirds said not applicable. No one was ‘Very happy’, 17% selected ‘Happy’, 8% were ‘OK’ and another 8% were ‘Unhappy’.
- Train: 40% said not applicable. 32% selected ‘Very happy’ and ‘Happy’, 8% were ‘OK’, 4% reported ‘Unhappy’ and 16% said ‘Very happy’.
- Other (e.g. as a passenger in vehicles): Two-thirds said not applicable. 11% reported ‘Very happy’ and ‘Happy’, 17% were ‘OK’ and 6% selected ‘Very unhappy’.

Overall, respondents predominantly use sustainable modes of transport such as walking, cycling, buses and trains when travelling on their own with walking be the happiest way. It is noted that 15% -20% of the respondents felt unhappy or very unhappy when cycling, taking bus or train. According to their feedback in the later sections, the main reasons are likely to be long travel times to schools caused by incompatible bus and school timetables as well as expensive bus fares.

	1 - I don't travel this way	2 - Very happy	3 - Happy	4 - Ok	5 - Unhappy	6 - Very unhappy
Walk	0%	26.92%	50%	15.38%	7.69%	0%
Bus	14.29%	25%	25%	21.43%	3.57%	10.71%
Cycle	44%	16%	16%	8%	16%	0%
Scooter	66.67%	0%	16.67%	8.33%	8.33%	0%
Train	40%	20%	12%	8%	4%	16%
Other	66.67%	5.56%	5.56%	16.67%	0%	5.56%

Figure 17: Satisfaction of respondents to use different mode of travel

Transport challenges

Respondents were asked to indicate their level of agreement with the key transport challenges using a four-point scale: agree, not sure, disagree and no answer. They were invited to provide their thoughts on each challenge.

Q Do you agree or disagree that we should help people be healthier and have picked the best way to do it?

Nearly 80% agreed that the council should help people be healthier, 14% reported they were not sure, 3% disagreed and 3% had no answer.

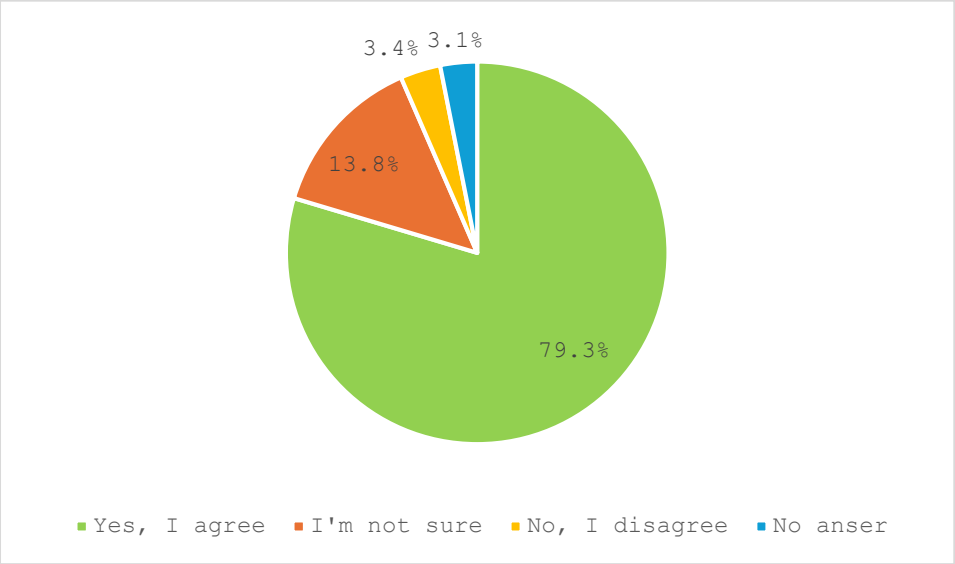


Figure 18: Results of question: Do you agree or disagree that we should help people be healthier and have picked the best way to do it?

Comments	No. of times raised
Walking and cycling	
Unsafe cycle network, particularly near schools and parks	2
Make walking and cycling safer	1
Total	**3**
Public transport	
Long travel times to schools	2
Insufficient public transport, especially buses during school hours	2
Expensive bus fares	1
Total	**5**
Environment	
Suggested to improve environment by planting more trees and enhance scenery to make journeys more pleasant and potentially reduce congestion	1
Total	**1**
Council policy	
Reported the new secondary school admissions policy could lead to students travel longer journeys to schools	1
Most young people only move if there is an incentive	1
Total	**2**

Table 13: Respondents' comments for by themes

Q Do you agree or disagree that we should focus on improving journeys for buses and bicycles and have picked the best way to do it?

Nearly 60% agreed that the council should focus on improving journeys for buses and bicycles, 21% reported they were not sure, 17% disagreed and 3% had no answer.

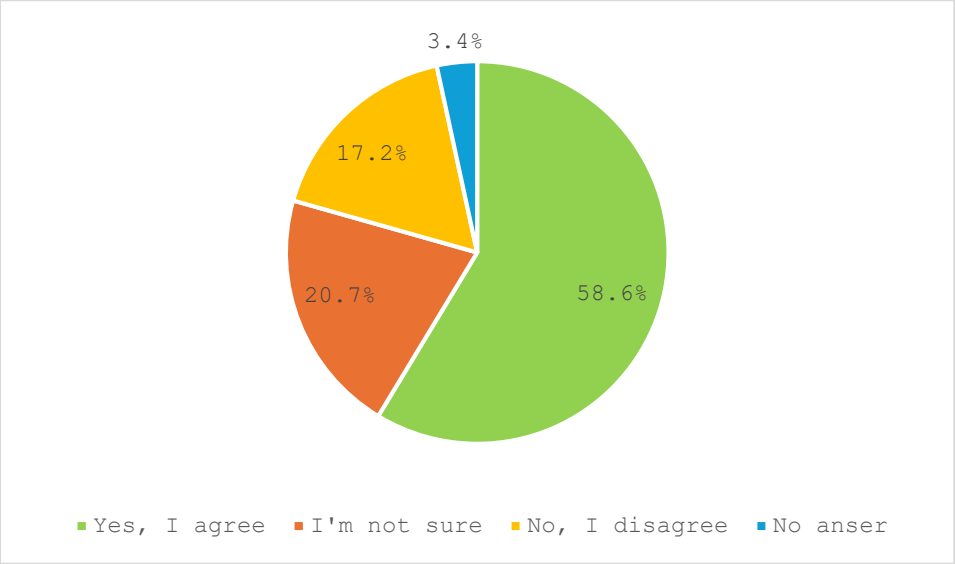


Figure 19: Results of question: Do you agree or disagree that we should focus on improving journeys for buses and bicycles and have picked the best way to do it?

Comments	No. of times raised
Walking and cycling	
Safer/ protected cycle lanes and calls for a full cycle network	5
Clearly separate pedestrians and cyclists	1
Unsafe cycle network, particularly near schools and parks	1
Total	**7**
Public transport	
Better bus connectivity to schools	2
Supported for bus lanes	1
Welcomed Park & Ride	1
Cheaper bus fares	1
Total	**5**
Environment	
Believed public transport and cycling can help reduce the city's carbon emission	1
Total	**1**
Council policy	
Concerned that parents will give their children a lift to school if students need to travel long journeys, especially bus timetables not matching with school timetables	1
Total	**1**
Driving	
Reduce cars	1
Total	**1**
Inclusivity	

Bus is not access for all, mainly for elderly and disabled people	1
Good public transport is important as not everyone has a car	1
Total	**2**

Table 14: Respondents' comments for by themes

Q Do you agree or disagree that we should reduce pollution have picked the best way to do it?

Around 60% agreed that the council should reduce pollution, 21% reported they were not sure, 10% disagreed and 7% had no answer.

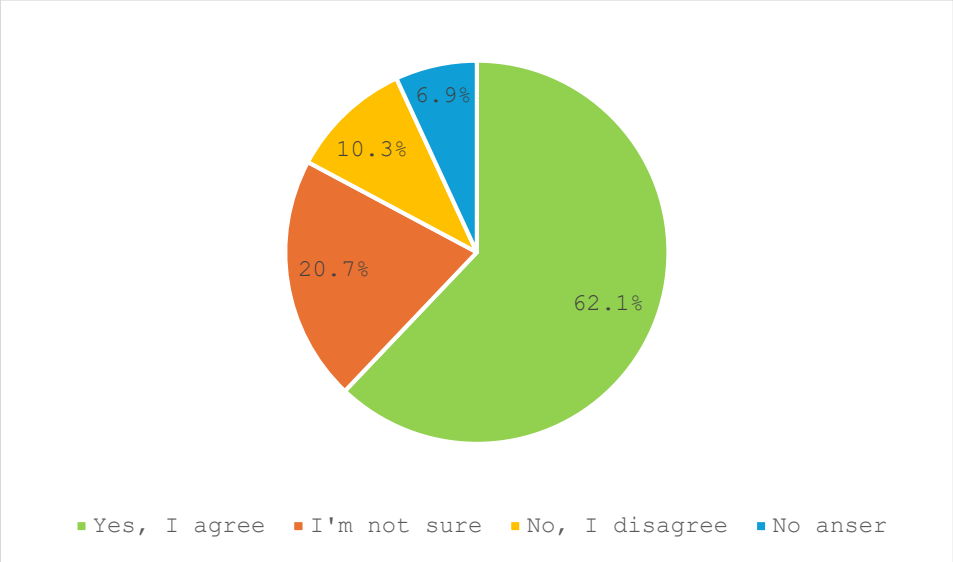


Figure 20: Results of question: Do you agree or disagree that we should reduce pollution have picked the best way to do it?

Comments	No. of times raised
EVs	
Need more chargepoints, fast chargers in accessible areas and affordable	3
Nota a viable option as EVs are not affordable to everyone	2
EVs cannot reduce congestion in the city	2
Supported for EVs to reduce air pollution	1
EVs damage roads and are unsafe as they are quiet	1
Total	**9**
Environment	
Vans are big polluters	1
Total	**1**

Table 15: Respondents' comments for by themes

Q Do you agree or disagree that we should make transport better for everyone and have picked the best way to do it?

Around 76% agreed that the council should make transport better for everyone, 10% reported they were not sure, 7% disagreed and 7% had no answer.

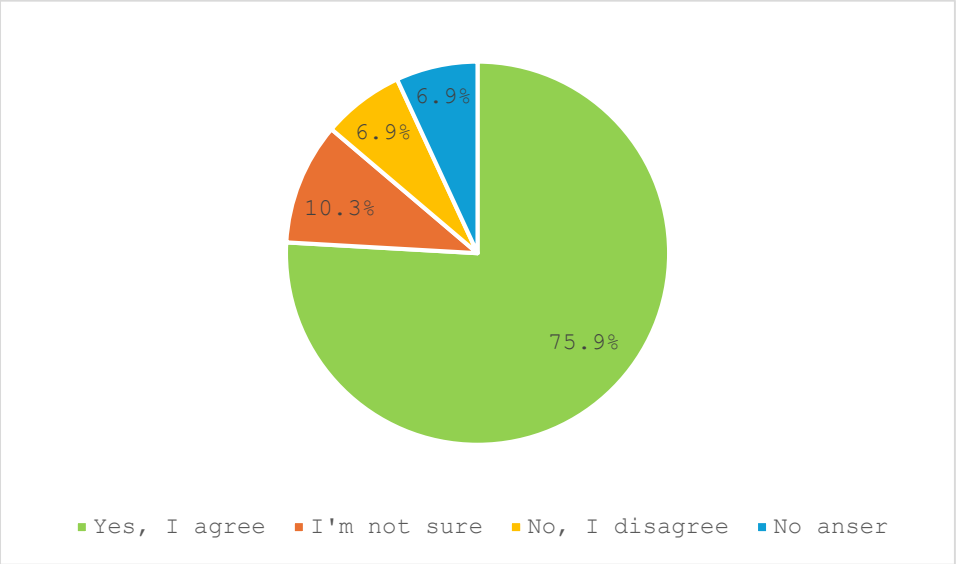


Figure 21: Results of question: Do you agree or disagree that we should make transport better for everyone and have picked the best way to do it?

Comments	No. of times raised
Public transport	
Cheaper bus fares/ free for students	2
Need more areas for wheelchair users	1
Extra bus services to allow students joining school clubs	1
Total	**4**
Parking	
Parking is difficult	1
Total	**1**
Pavements	
Rough pavements	1
Total	**1**

Table 16: Respondents' comments for by themes

Q Do you agree or disagree that we should improve roads and pavements and have picked the best way to do it?

Sixty-nine percent agreed that the council should make improve roads and pavements, 14% reported they were not sure, 10% disagreed and 7% had no answer.

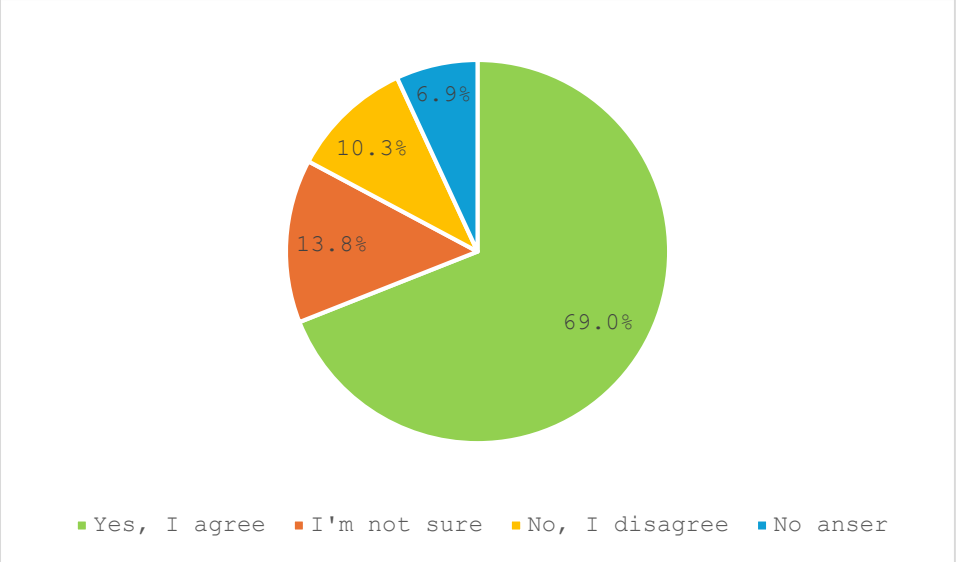


Figure 22: Results of question: Do you agree or disagree that we should improve roads and pavements and have picked the best way to do it?

Comments	No. of times raised
Roads and pavements	
Fix the road, so safer for everyone	4
Pavements are full of weeds and rough	2
Better pavements for everyone (e.g. runners, wheelchair users)	2
Focus on more sustainable routes rather than renovating old roads	1
Total	**9**
Public transport	
Cheaper fares	1
Call for tram	1
Total	**2**
Cycling	
Reduce cycle lanes	1
Total	**1**
Suggestion	
Residents probably wouldn't mind fundraising themselves with community events and donations	1
Total	**1**

Table 17: Respondents' comments for by themes

About you

Q What is your connection to Brighton & Hove?

Almost all of the respondents were residents, 3.4% visit Brighton & Hove regularly and 3.4% reported other.

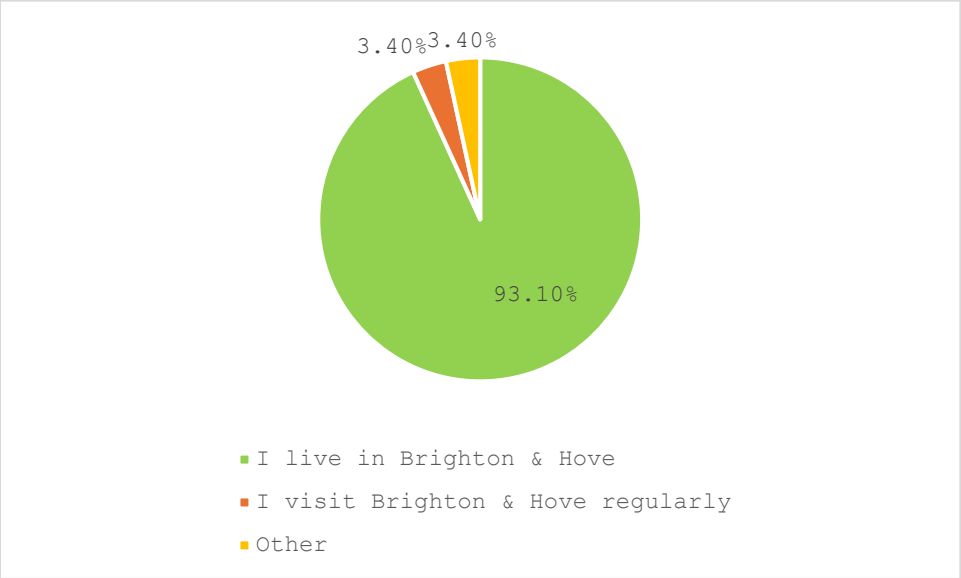


Figure 23: Results of question: What is your connection to Brighton & Hove?

Q What is your age?

Over half of the respondents were 13 to 16 years old, one-third of them were 10 to 12 years old, around 7% were 17 to 18 years old and preferred not to say each.

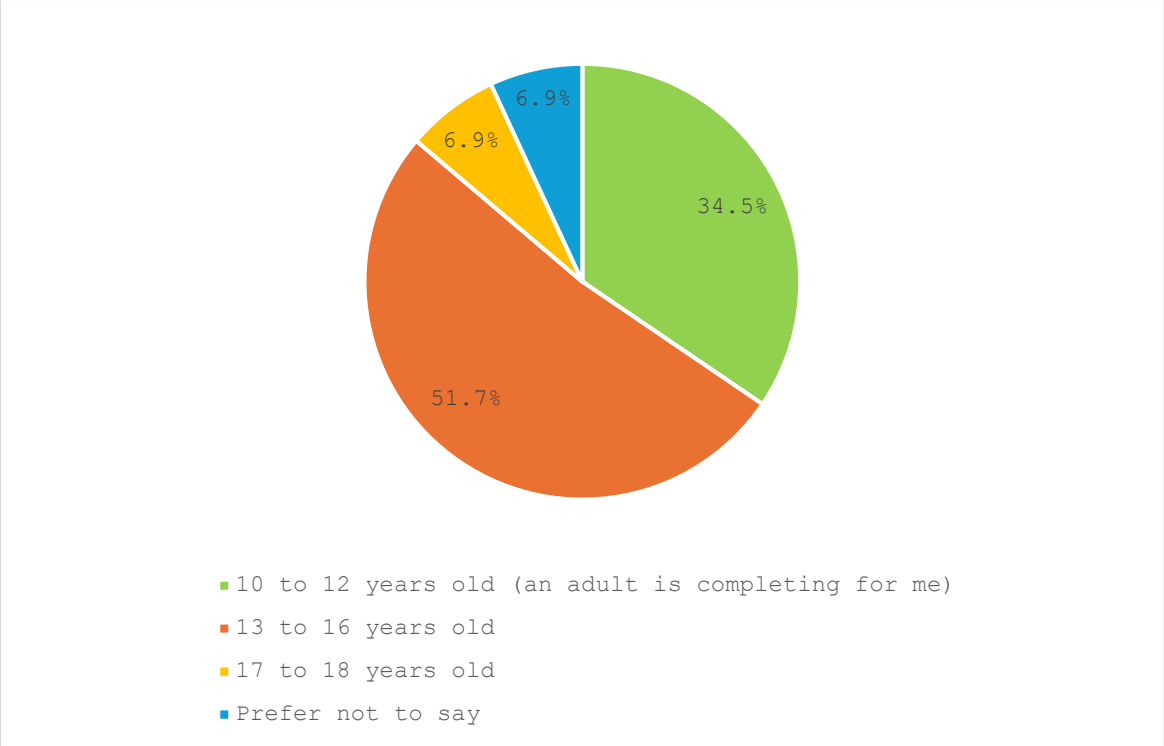


Figure 24: Results of question: What is your age?

Street map

Respondents were invited to provide the street they live on an optional basis. These streets were illustrated indicatively in Figure 25.

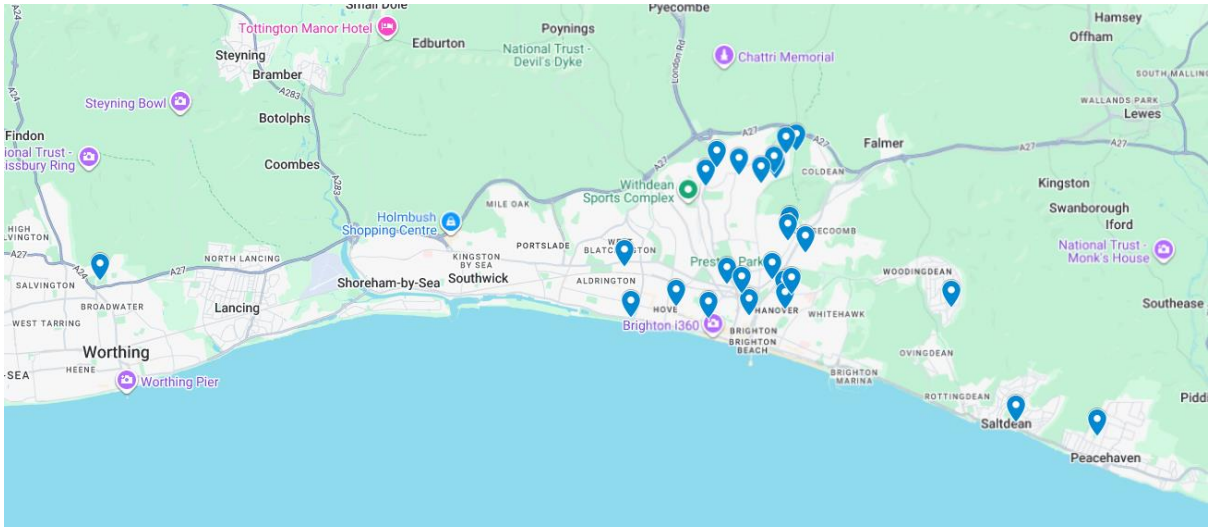


Figure 25: Street map

Feedback and suggestions

Q We want to continue hearing from young people like you. What are the best ways to get your feedback and ideas in the future?

Over half of the respondents reported joining a discussion at their schools is the best way to get their feedback in the future, 17% reported ‘No answer’, 10% selected ‘Completing a survey on Your Voice’, 7% chose TikTok, 3% Instagram and 3% selected ‘Other’ who elaborated that on a multitude of social media platforms would be the best way. They thought surveys and school visits can be useful, but not as many people may pay attention to them. No one selected Facebook and X.

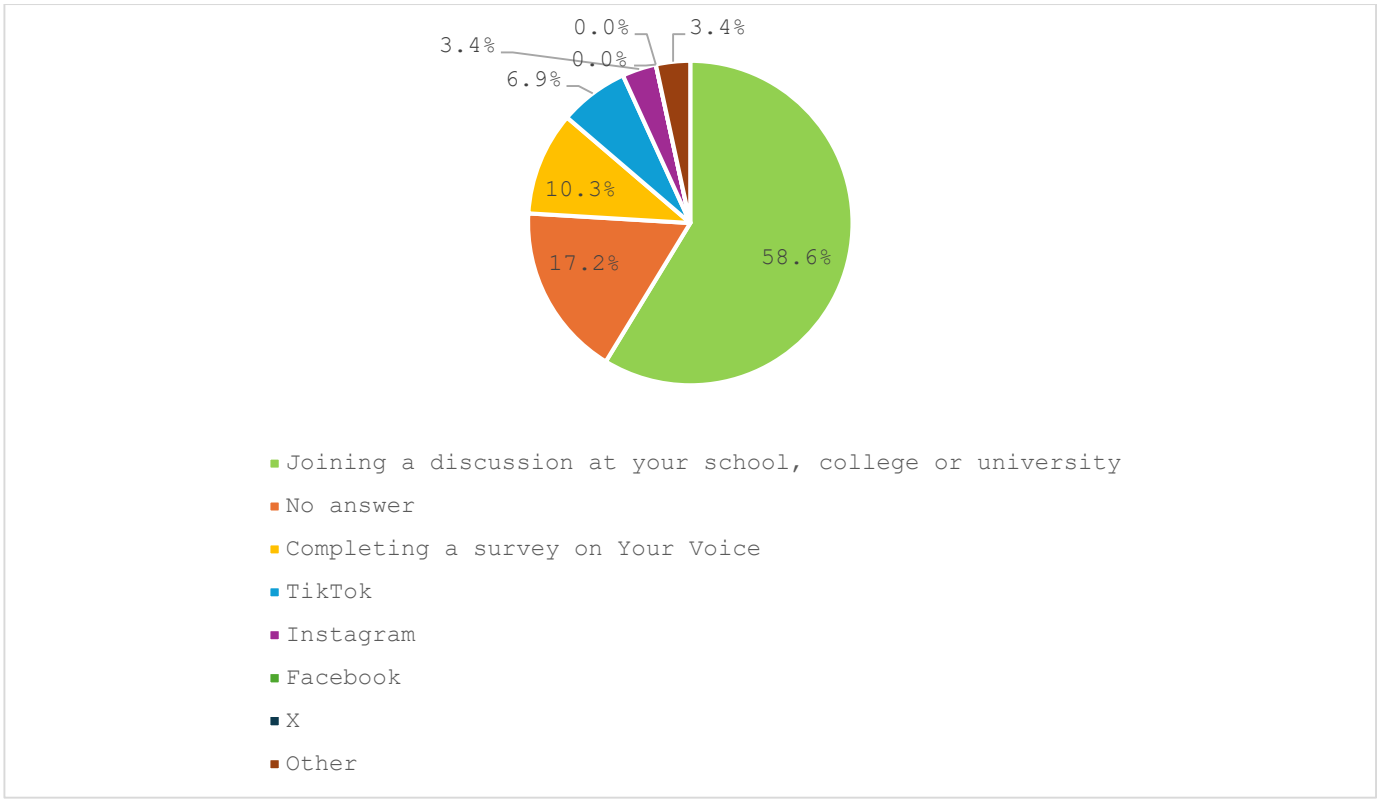


Figure 26: Results of question: We want to continue hearing from young people like you. What are the best ways to get your feedback and ideas in the future?

6 Annex 1 – List of events, workshops and poster distribution

Public events

A public exhibition was in place at the Jubilee Library on:

- 30 June (Monday) – 6 July (Sunday) 2025

Drop-in sessions were held at libraries on:

- Jubilee Library – 1 July 2025 (Tuesday)
- Patcham Library – 8 July 2025 (Tuesday)
- Hangleton Library – 10 July 2025 (Thursday)
- Rottingdean Library – 14 July 2025 (Monday)
- Portslade Library – 16 July 2025 (Wednesday)
- Jubilee Library – 19 July 2025 (Saturday)
- Hove Library – 21 July 2025 (Thursday)

The consultation was also promoted at the following wider events:

- Charge and Drive Experience Day – 21 June 2025 (Saturday)
- A259 Active Travel Scheme drop-in sessions:
  - King Alfred Leisure Centre Ballroom – 3 July 2025 (Thursday)
  - South Portslade Community Centre – 10 July (Thursday)

Workshops/ meetings

Workshops facilitated by officers:

- Cardinal Newman Catholic School – 4 June 2025 (Wednesday)
- Brighton Aldridge Community Academy – 5 June 2025 (Thursday)
- Portslade Aldridge Community Academy – 9 June 2025 (Monday)
- Longhill High School – 12 June 2025 (Thursday)
- Dorothy Stringer School – 12 June 2025 (Thursday)

Meetings attended by officers:

- Taxi Forum – 9 June 2025 (Monday)
- Transport Partnership – 10 June (Tuesday)
- Destination Experience Group – 16 June 2025 (Monday)
- Local Access Forum – 24 July 2025 (Thursday)
- Healthy Weight Programme Board – 28 July 2026 (Monday)
- Possibility People - GIG – 28 July 2025 (Monday)

Posters for the consultation were posted to the following organisations with a letter asking to recipients to display in their premises where possible. Postcards were also distributed to some large venues e.g. leisure centres:

- Brighton Met College, Pelham Street
- Amex
- Royal Sussex County Hospital
- Brighton General Hospital
- Hove Polyclinic
- BUPA Brighton Clinic
- Prince Regent Swimming Pool
- St Luke's Swimming Pool
- Brighthelm Centre
- King Alfred Leisure Centre
- Moulsecoomb Leisure Centre
- Withdean Leisure Centre
- Stanley Deason Leisure Centre
- Portslade Sports Centre
- Hollingdean Community Centre
- Hangleton Community Centre
- Kemptown Crypt Community Centre
- Community Base
- The Phoenix Community Centre
- West Hill Hall
- Millwood Community Centre
- Bmecp Centre
- The Hop 50+
- Vallance Community Centre
- Old Boat Corner Community Centre
- Meadowview Community Centre
- University of Brighton, Grand Parade
- The Ledward Centre
- Patcham Community Centre
- The Edge Community Centre
- Crowhurst Community Centre
- Cornerstone centre
- Hanover Community Centre
- Legal and General
- Amex Stadium
- New England House
- Jubilee Library
- Coldean Library
- Hangleton Library
- Hollingbury Library
- Moulsecoomb Library
- Patcham Library
- Hove Library
- Rottingdean Library
- Portslade Library
- Saltdean Library
- Westdean Library
- Whitehawk Library
- Woodingdean Library
- University of Sussex
- University of Brighton
- University of Sussex Library
- Exeter Street Hall
- St Peter’s House Library University of Brighton

7 Appendix A – Online survey questions

1. Firstly, how are you responding to this survey? Multiple choices

As a resident

I work or study here

On behalf of a business or organisation

As a visitor

As the owner of a business

2. Please tell us your postcode. Short answer

3. What mode of travel do you mostly use different types of trips? Matrix of trip purposes against mode of travel?

Trip purposes	Mode of travel
Commuting to work	*Not applicable*
For education	*Walk*
For shopping	*Cycle*
For leisure	*Bus*
Visit the city	*Train*
	Car
	Taxi or private hire vehicle
	Mobility scooter or wheelchair
	Motorbike or moped

4. What is the name of the business or organisation you're representing? Short answer

Only respondents who selected *On behalf of a business or organisation* and *As the* owner of a business needed to answer this question.

5. What is your name and position within the organisation?

Only respondents who selected *On behalf of a business or organisation* and *As the* owner of a business needed to answer this question.

6. Do you agree or disagree that these 5 challenges are what we should focus our resources on tackling? Matrix of challenges against level of agreement

Challenges	Level of agreement
Challenge 1: enabling more people to live safer, healthier and more active lives	*Strongly agree*
Challenge 2: improving the flow of traffic on our roads	*Agree*
Challenge 3: supporting the transition to low and zero emission vehicles	*Neither agree nor disagree*
Challenge 4: creating a transport network that is more inclusive	*Disagree*
Challenge 5: maintaining our roads and managing them as efficiently as possible	*Strongly disagree*

7. Do you wish to share any comments to support your answers? Long answer

This is a follow-up question to question 6.

8. Do you agree or disagree that these objectives will address the challenges facing the city? Matrix of objectives against level of agreement

Objectives	Level of agreement
Objective 1: increase public transport use	*Strongly disagree*
Objective 2: enable the uptake and use of low and zero emission vehicles	*Disagree*
Objective 3: deliver a safe, inclusive and integrated transport system	*Neither agree nor disagree*
Objective 4: create well-maintained streets and pavements	*Agree*
Objective 5: provide active travel choices for all and excellent public spaces	*Strongly agree*
Objective 6: promote and use technology to reduce and manage travel	

9. Do you wish to provide any comments to support your answer? Long answer

This is a follow-up question to question 8.

10. Please rank the project types below in order of importance to you. Ranking

Subsidising public transport to make it more affordable
Maintenance of our roads and pavements
Supporting and encouraging residents, visitors and businesses to use public transport and active travel
Improving the accessibility of our streets
Improving safety with new crossings for pedestrians, targeted improvements at junctions and outside schools
Providing local transport hubs where a range of transport modes can be accessed
Installing electric vehicle chargepoints

11. Please rank the below major schemes in order of importance to you. Ranking

Improving the look and feel of the city centre to make it more pedestrian friendly
Improving bus journeys times in the city through bus lanes and red routes
Improving priority routes for active travel (walking, wheeling and cycling)
Sussex Coast Mass Rapid Transit – an express bus or tram that provides quicker connections between Brighton & Hove and other nearby coastal towns
Improving to access the city centre

New transport hubs at the city's edge offering Park & Ride, EV charging, vehicle hire and help reduce city truck traffic

12. Please share any other comments about Our City Transport Plan 2035. Long answer

13. How did you hear about this consultation? Multiple choices

Social media

Word of mouth

The council's website

By email

Local press

Information leaflet

I attended and event

No answer

Other

14. What gender are you? Multiple choice

Male

Female

Non-binary

Other

Prefer not to say

No answer

15. Do you identify as the sex you were assigned at birth? Multiple choices

Yes

No

Prefer not to say

No answer

16. What is your age? Multiple choices

18-24

25-34

35-44

45-54

55-64

65+

No answer

17. What is your ethnic group? Multiple choices

White

Asian/ Asian British

Mixed/ multiple ethnic groups

Black/ African/ Caribbean/ Black British

Other ethnic group

Prefer not to say

No answer

18. Do you have a health problem or disability? Multiple choices

Yes, a lot

Yes, a little

No

Prefer not to say

No answer

19. Your condition(s) Multiple choices

Physical Impairment

Long-standing Illness

Mental Health Condition

Autistic Spectrum

Sensory Impairment

Learning Disability / Difficulty

Developmental Condition

Other

No answer

8 Appendix B – Youth survey questions

1. What is your age? Multiple choices

10 to 12 years old (an adult is completing for me)

13 to 16 years old

17 to 18 years old

Prefer not to say

2. What is your connection to Brighton & Hove? Multiple choices

I live in Brighton & Hove

I visit Brighton & Hove regularly

Other (please specify below)

3. What is the street you live on? Short answer

4. Tell us how happy or unhappy you feel about traveling on your own without an adult. Matrix of mode of travel against level of happiness

Mode of travel	Level of happiness
Walk	*I don't travel this way*
Bus	*Very happy*
Cycle	*Happy*
Scooter	*OK*
Train	*Unhappy*
Other	*Very unhappy*

5. Do you agree or disagree that we should help people be healthier and have picked the best way to do it? Multiple choices

Yes, I agree

No, I disagree

I'm not sure

No answer

6. Do you have any thoughts on this? Long answer

This is a follow-up question to question 5.

7. Do you agree or disagree that we should focus on improving journeys for buses and bicycles and have picked the best way to do it? Multiple choices

Yes, I agree

No, I disagree

I'm not sure

No answer

8. Do you have any thoughts on this? *Long answer*

This is a follow-up question to question 7.

9. Do you agree or disagree that we should reduce pollution have picked the best way to do it? Multiple choices

Yes, I agree

No, I disagree

I'm not sure

No answer

10. Do you have any thoughts on this? *Long answer*

This is a follow-up question to question 9.

11. Do you agree or disagree that we should make transport better for everyone and have picked the best way to do it? Multiple choices

Yes, I agree

No, I disagree

I'm not sure

No answer

12. Do you have any thoughts on this? *Long answer*

This is a follow-up question to question 11.

13. Do you agree or disagree that we should improve roads and pavements and have picked the best way to do it? Multiple choices

Yes, I agree

No, I disagree

I'm not sure

No answer

14. Do you have any thoughts on this? *Long answer*

This is a follow-up question to question 13.

15. We want to continue hearing from young people like you. What are the best ways to get your feedback and ideas in the future?

Joining a discussion at your school, college or university

Completing a survey on Your Voice

Tiktok

Instagram

Facebook

X

Other

No answer

Respondents selected *Other* can write down their suggestion(s).

9 Appendix C - Organisational responses

Bricycles
The challenge of reducing the number of car journeys should be specifically included - not just increasing public transport and active travel and switching to zero-emission vehicles.

The park and ride plan to increase public transport use can only succeed if it also removes city centre visitor parking, to make the P&R the more attractive option. If drivers can still easily park in the centre, they will not choose the public transport option. There also needs to be signs at/before the P&R location to indicate when any city centre parking is full and the P&R is the only option. City centre parking spaces that are replaced by P&R spaces should be reallocated to resident's permit holders to free up on-street parking spaces to be reallocated to protected cycle infrastructure and wider pavements. Objective 5 (to provide active travel choices) should include introducing new residents' bike hangars in areas with high demand until there are no waiting lists and also secure cycle parking at the destination - repurpose unused city centre shops to provide secure, guarded cycle parking during peak shopping and visit.

Active travel is key to addressing inequalities.
Safe cycling gives freedom to children that are too young to drive
For low/no income residents, the bus is likely to be expensive
Disabled people can also benefit from cycling investment. For some people with disabilities, cycling is more achievable than walking. Mobility scooters have been using cycle lanes, too, which is welcome.

The 'Major scheme to improve city centre walkability' which the plan refers to, needs to be a car-free city centre, covering at least the Lanes and North Laine areas (with the usual allowances for deliveries, residents and blue badges). This was the number one recommendation of the Climate Assembly in 2020 and has been shown to work really well in so many European cities.

Brighton & Hove Bus and Coach Company
Challenge 1 should also note that bus users walk to and from the bus stops so are closely associated with active travel.

Challenge 2 highlights the issue of congestion and the need to improve traffic flows. This is absolutely critical for bus services as slow bus operating speeds and poor reliability very negatively impact on bus use. The city has the highest bus use in the country outside London by a significant margin and much of this has been achieved by delivering bus priority measures in the city so buses can be attractive and reliable as every survey of bus users shows that this is the most important thing to them. It is vital for the plan to further recognise the importance of bus priority over private cars as this is a key factor in the city's exceptionally high bus use. Other measures such as lower speed limits, active travel schemes and additional traffic lights have slowed bus speeds in the city in recent years, increasing the cost of operating the service (and therefore fare levels) and making it less attractive than it would otherwise be. It is key that we do not stop developing further bus priority schemes. Without more bus priority there is a serious risk of bus patronage falling. The first two red routes have been excellent and the planned additional schemes will improve the service for bus users, as will traffic offence enforcement on buses.
Express services are deemed highly desirable has been demonstrated by the 1X launch in 2024 and enhancement in 2025. Another new limited stop service is being launched in 2025 and it is important to appreciate the importance of people's time that is saved by getting people to their destination more quickly.

Challenge 3 stresses the importance of switching to zero emission vehicles and this will include buses. A challenge with this is being able to convert bus depot infrastructure to electric vehicles as well as range challenges with them. There will be significant electric buses coming to the city in 2026/27 and beyond.
As noted in the detail, shifting journeys on to public transport is a way of making major reductions in emissions and the action of prioritising buses is the single biggest way to support this.

Challenge 4's ambition of an inclusive transport network is wholly embraced by Brighton & Hove Buses who are the UK's only bus company who are Leader status in the DfT's Inclusive Transport scheme and winner of the Best Practice in Diversity, Inclusivity and Accessibility Award at the National Transport Awards. It is vital that the infrastructure supporting bus services is fully accessible and we continue to advise strongly against the use of bus stop bypasses, especially where they are less than the DfT's minimum recommended width in LTN 1/20.
Although the city has one of the best Night Bus networks in the country (operated wholly commercially), there is scope to improve inclusion in the city by improving this further to help access to jobs and grow the night-time sector.
Enabling safe travel on public transport is key as inclusivity is damaged by some potential users feeling unsafe on buses and trains as well as getting to and from stops and stations. The provision of Travel Safe Officers on the bus network and CCTV and better lighting key bus stops could really help here.
New and improved bus services can help reduce inequalities in the city and planned service improvements in September 2025 help to provide new links to some of the areas identified as having some of the biggest challenges.
The price of bus services is determined by the cost of operation, which increases significantly when bus speeds worsen. Bus priority and faster bus operating speeds can keep fares lower for everyone.
Objective 1 includes an outline of the summary of the BSIP which we strongly support. However, there are other projects that could also help to increase public transport use such as more frequent commercial services, more Night Buses and safer travel initiatives (Travel Safe Officers and CCTV/better lighting at bus shelters) which also relates to Objective 3.
There is a lot of joint work that we are keen to partner with the City Council on to improve safety on buses, especially in relation to Violence Against Women and Girls. Objective 6 mentions bus traffic light priority which is very welcome but it would be good if this could be expediated - East Sussex has rolled it out across almost all traffic lights in the county over a very short period of time.
The document refers to buses being suitable for short trips but buses can also play a key role in longer journeys, as is demonstrated by the large number of bus users travelling from Brighton & Hove to regional destinations including Eastbourne, Newhaven, Worthing, Lewes, Uckfield, Tunbridge Wells, Crawley, Haywards Heath etc. Brighton & Hove Buses is keen to further develop these links.

The Transport funding section on page 38 in the bus section should also refer to the investment made by transport operators. For example, Brighton & Hove Buses is investing nearly £50 million in the city between 2024-2026 in 117 new buses and totally rebuilding the depot in Hove to be able to run EVs and additional buses. Likewise, the narrative about bus service should make the point that the city has an exceptionally high proportion of bus service operated commercially, without taxpayer support. The statement on page 44 that funding for bus services is historically high isn't correct in comparison with other areas which also generally have much poorer provision.

The BSIP refresh includes further development of proposals for bus priority or improvements that will help buses at Downs Hotel junction in Woodingdean and in Rottingdean. These aren't listed in the plan.

Brighton & Hove City Council - Principal Emissions and Air Quality

Road safety appears to be higher up the hierarchy than reducing pollution - a much higher risk factor for health

Social responsibility that maintained roads and pavements only use ultralow or zero vehicles and machinery
Relating to transport projects to objectives achieve: emissions and air quality not specifically mentioned in the priority order. Risk this is not part of pre-scheme discussion and assessment. Something added on as a secondary after thought or in reaction to public and Cllr enquiry. Low emission is not the wording used with bus-ULEZ and the AQAP and is incorrect. LTP needs to refer to ultra-low and zero throughout. Low emission is polluting and backward compared to the 2025 situation. Low emission has been available for twenty years and is not the future.

Brighton & Hove City Council – City Plan
As recognised in the draft LTP our road network struggles to cope when there are lots of people on the move at the same time and there are very limited opportunities to increase the capacity for motorised vehicles. Through the emerging City Plan 2041 we will be allocating additional development sites with the aim of meeting as far as possible the city's needs for additional housing and employment space. Further development could place additional demands on the existing transport infrastructure, in particular the road network. We therefore strongly support the objective of giving more people the option of choosing active travel so that additional development does not cause unacceptable impacts on the existing transport infrastructure. In particular, the junctions on the strategic road network along the A27 are all known to be near capacity with limited scope for upgrade without major works which are not currently funded. Additional traffic movements caused by significant new development risks the operation of these junctions becoming unsafe in the view of National Highways.

It is important that strong connections are made between the LTP and the City Plan 2041. We note that this connection is explicitly made in the draft and we look forward to continuing working closely together as both plans evolve.

Brighton and Hove Cycling UK
There is too much motor vehicle traffic everywhere and we need Road Traffic Reduction in Brighton and Hove, quantified and monitored as a KPI. A Liveable (car free?) City Centre was expected, but this does not appear.

The big question is how you interpret the challenges and the objectives and the subsequent actions. We welcome Brighton and Hove City Council's good work in extending the cycle network e.g. Valley Gardens Phase 3, the A23 Phases 1a and 1b, Better access to the Marina, continuing the roll out of bike hangars and bike share, also speed reduction, School Streets, cycle training and other work. We look forward to improved cycling/wheeling/walking facilities on the A259 and the A23 Phases 2 and 3 and other Active Travel schemes.

We are glad to see that you will continue to enable "active travel (walking, wheeling, cycling) and public transport" However, we are concerned that there is no major headline about Road Traffic Reduction or about a Liveable (car free) city centre in LTP5. We support strongly decarbonisation, but switching to electric vehicles isn't enough. Your own document says: "The graph shows that while Our City Transport Plan 2035 policies will make a positive impact on reducing carbon emissions there remains some way to go to get close to the CCC balanced pathway." And "more needs to be done to reduce emissions".

We need more than electric vehicles to reach carbon emission targets. We need Road Traffic Reduction. We also need this for air quality improvements and to reduce road danger. Reduction in motorised vehicle mileage should be included in your Key Performance Indicators (KPIs). "Balancing" essential carbon reduction against other policies an relying on national measures or other stricter authorities is not dealing with the issue. There needs to be consideration in the LTP of the need for a clear limit for road traffic coming into the city.

Given the current objectives in the LTP, the streets of Brighton and Hove might simply fill up with electric cars, EV charging places and buses, probably stuck in traffic jams. Even Objective 6 "Promote and use technology to reduce and manage travel" does not put forward a limit for car trips and seems to be more about managing high levels of motor traffic. It is very unfortunate that the government subsidies for electric vehicles do not provide the opportunity for people to switch to an e-bike and public transport i.e. no car as a first and cheaper option. Perhaps something along these lines can be introduced at local level? Research is showing that when people switch to EVs, they do more mileage because home charging is cheap. People are also choosing to buy bigger and heavier cars (43% SUVs) that are more likely to kill or seriously injure people (especially children), take up more road space, cause more damage to roads and infrastructure.

The permeability of the city by cycle is reducing. Roads like North Street are heavily trafficked and therefore unattractive, while the quieter streets are being used for café tables, trader equipment or closed for events, as are parks like Preston Park. We do need to see clear passage for cycling and cargo bikes if they are to replace deliveries by van and HGVs. Challenges 1-5 – points below. Challenge 1. Very strongly support the active travel schemes mentioned on page 19. It is well know that there is under reporting of cycling injuries this needs factoring in. Sussex Police are no longer in the SSRP. Does the council get full and timely data about collisions? Besides ensuring good provision for walking, wheeling and cycling, and public, shared and community transport, councils should seek to manage travel demand, both in general (e.g. through land-use planning policies and/or investing in digital connectivity) and specifically by private motor vehicles.

Land-use planning policies should ensure that the location and design of new developments support a low traffic future, reflecting the '15 minute neighbourhood' principle, where key destinations (schools, shops, healthcare, etc) can be reached within a short walk/wheel or cycle ride of people's homes. Challenge 2. "Improving the flow of traffic on our roads" is not necessarily a good thing at all if you are talking about motor vehicles! (The term traffic can also apply to cycling and walking.) Having fewer motor vehicles on roads and streets is desirable. Sometimes traffic needs to be held back because it is stopping people cross the road, degrading the streets, deterring active travel, causing infrastructure damage and preventing social contact due to noise, obstruction, emissions etc. Also, it has the capacity to kill and injure especially at higher speeds.

We observe the administrations enthusiasm for park and ride, described as "purpose built". This will be an additional car park somewhere on the city edge and will not reduce road traffic unless an equivalent number of car parking spaces are removed from the city centre. This is also an expensive way to reduce driving in the town centre, with the cost of a car park and subsidised bus fares. Road user charging schemes are needed to tackle congestion and pollution, by managing demand for private motor vehicle trips. Motor vehicle traffic restrictions should be considered to improve the ambience in the town centre, to reduce carbon and air pollution, the domination of streets, collisions and casualties. We strongly support the reduction of HGVs in the city. They are a danger to people. But there will need to be careful planning and management to ensure that "mobility hubs" on the edge of town do not simply become a big car park, adding to the many car parks already in the City.

Cars are also getting bigger and taking up more space. What will be the cost of providing Park and Ride? If Park and Ride is introduced, we need removal of an equivalent or greater number of parking places in the city centre or we will simply be adding to parking and motor vehicle movements, and also subsidising them with the £7 charge which covers both (all day?) parking and bus transport for all passengers. This would encourage more journeys along the A27 and from elsewhere to take advantage of a cheap rate. The Park and Ride site could be a car trip generator when we instead need investment in better end-to-end public transport and more safe, connected active travel routes.

We support the council to urgently and strongly lobby government for powers to stop pavement parking. There is a cycle route (Regional Route 90) running from Brighton-Falmer-Lewes. More Park and Ride motor traffic can bring hazard. We note there was a major collision at Knights Gate Road/Falmer Road in May 2025 which left a mass of debris and demolished a solid flint wall as the crash crossed a cycle track. We have asked BHCC for details Challenge 3 is not optimised. The best transition is not to another motor vehicle. EV's are only emission-free at the point of use, and a lot of carbon is used to manufacture electric cars. There are also Lithium mining issues as well as the ongoing toll of road injuries, and domination of public space due to car driving. It is unclear how exactly and to what extent Brighton will contribute to “60% of the UK fleet being fully battery electric by 2035” and a “9% car trip reduction by 2035”.

Vehicle scrappage schemes can help people give up older and more polluting cars or vans. However they should offer alternatives to another car, i.e. public transport season tickets, new e-bikes or cargo bikes etc. Yes, to cargo bikes instead of HGVs. but Brighton centre is becoming less permeable to cycling, especially if taking a cargo bike through Ship Street, Black Lion Street, parts of North Laine etc. Because people are buying larger cars (SUVs) fuel efficiencies are being negated. Electric cars also contain large heavy batteries.

Challenge 4 It is good to review bus services but also to review the potential for cycling. Regarding your point on P.28 that “Walking and cycling are the modes with the least pronounced variation by household income…A transport network that prioritises walking and bus users is one that helps to make it more inclusive for all.” It is unclear how the “areas at risk” of TRSE equate to the number of people/households actually at risk in the area. Buses cannot run everywhere all the time, but cycling (like walking) is unlimited by timetables and so is absolutely irreplaceable for those who do not or cannot drive. The point you make also refers to *current* transport choice, but cycling has been greatly disadvantaged over many years by the growth in motor vehicle traffic, increased road danger and the severance of cycle routes. Your conclusion does not consider the potential for cycling to replace motorised journeys or for cycling plus public transport to replace car trips once a fuller cycling network has been established. Currently we do not have such a network. Improved accessibility for disabled people also needs to be taken forward by the train service providers due to steps at many stations.

Challenge 5. Potholes and poor road surfaces are a hazard for active travel and we are strongly supportive of good maintenance. OTHER POINTS Neighbours: TfSE has a big roads agenda, and our closest neighbours (WSCC and ESCC) show little ability to build cycling infrastructure. We note two TfSE Active Travel routes listed in LTP5, H1 Sussex Coast and M11 Brighton to London, NCN. We support these of course, but there is no detail. Most funding is going to infrastructure for driving. Being in a single Mayoral Authority with ESCC and WSCC will expose the Brighton and Hove area to the roads agenda favoured by the county councils and therefore more road traffic being delivered via the major A roads.

TfSE was in favour of the Lower Thames Crossing, an expensive, traffic generating scheme. Brighton and Hove City Council has not yet fully distanced itself from this counterproductive agenda. We note that the LTP says: “this plan does not advocate extensive new

roadbuilding” and we strongly support a switch from funding road schemes to active travel infrastructure instead. This will also benefit nature and biodiversity. Funding: When there is such a mixed bag of schemes, it is important to ensure that the more sustainable and cycling schemes are not deferred, while the less sustainable (road upgrades) are taken forward. Joined up planning: From Brighton & Hove Physical Activity and Sport Strategy 2024 to 2034 “We need to widen access to opportunities to be active in our parks, the South Downs and on the seafront to harness the unique potential of our city’s location and the benefits of being active outdoors and in nature.” Whilst the LCWIP and ROWIP are separate documents for administrative and governmental purposes, we need to see some joined up planning, with ambitions for active travel combined in one plan.

The two council departments (ROW and Highways/transport) need to be brought much closer together so that routes for cycling are looked at holistically, and that the lack of safe crossings over major A-roads like the A23 and A27 or paths along these roads are given more attention. For example, as NCN20 (still within the BHCC boundary) turns left at Patcham’s Mill Road, it goes through a two-way narrow rail bridge onto a 60 mph (NSL) speed limit road where a right turn is expected to continue. Fast traffic needs to be slowed and narrow, dangerous areas for walking/wheeling & cycling need to be improved.
This survey limits the respondent far too much by offering only selected choices. It is designed to seek endorsement rather than views. Tiny linear text boxes in this survey for responses on these transport issues are inadequate.

Brighton and Hove Clarion Cycling Club
Low emission vehicles (i.e. electric cars) seem to be prioritised here over the importance of no emission vehicles such as bicycles and electric bikes (very small amount of emissions). Electric cars produce emissions, not least tyre particulates. Furthermore they encourage the use of car driving instead of walking and cycling, with roads designed for car use, not active travel use.

Instead of a bland 'improving the flow of traffic on our roads' we need to see a 20mph speed limit throughout the entire city. Not doing this and/or not enforcing this is in direct contradiction of challenge 1.

https://post.parliament.uk/research-briefings/post-pb-0065/

We also need to see much greater emphasis of making many more streets car free, particularly in the centre, North Laine and all of the Lanes for example.

There should be a target of a minimum width for pavements of two metres everywhere in the city. Brighton and Hove should pressure central government for a total ban on pavement parking and this should be enforced.

Pavements should also be freed up from bins and other street clutter. Bins, signs etc should be placed in the road.

There is nothing in the city plan which encourages the development of play streets. Many parts of the city have small or no gardens. Children have never been balloted about the denial of space for streets to play on.

https://playingout.net/

Other countries take play streets for granted and it is hugely disappointing that Brighton and Hove council do not have any vision for this.

Park and ride will only succeed if city centre parking is removed. There should be signs to

say that city centre parking is full and park and ride is the only option. City centre parking spaces should then be freed up for residents which in turn, would free up space for cycle parking, trees, pocket parks and so on.

Empty city centre shops could be re-purposed as cycle parking.

There is no mention of the importance of trees in making pleasant and attractive walking and cycling routes. Trees are hugely important in the regulation of temperature caused by climate change. They also encourage people to use streets as active travel thoroughfares.

Disabled people and children benefit massively from safe cycling and walking routes. Over a third of Brighton and Hove residents do not have access to a car and although bus fares have been pegged, they are still expensive. Many disabled people can cycle even if they can't walk. Children would benefit if they had access to completely safe cycle lanes (Paint is not Protection).

20 mph throughout the city. Prioritising active travel, cycling and walking, rather than electric vehicles. Making much more of the city car free especially the city centre, North Laine and the lanes. Making it much easier to cross roads by narrowing street entrances rather than having them convex. Provide a full network of segregated cycle lanes to the latest design specifications. Implement a series of play streets only open to residents at 5mph giving children the freedom to play out. Plant more trees in the streets.
Introduce low traffic areas and re-install the Old Shoreham Road bike land along with many other bike lanes

Brighton and Hove Older Peoples' Council

Transport and Parking Issues for Older People reported as consistent accessibility themes to Brighton and Hove Older People's Council.
Please take this submission into account with the transport strategy review and for the Equalities Impact Assessment
Sept 2025

Background
• Social Isolation remains a huge issue for older people in our City - Older people reporting social isolation are high, both nationally and locally.
• Reducing isolation needs continued attention- Accessibility issues mentioned below , exacerbate isolation, and lack of independence and well-being- (also closely linked to housing , community development, & health issues.)

• Health problems affect mobility for many older people, who do not qualify for a blue badge, but can not walk far or are concerned about falls. Issues affecting older people with mobility problems often intersect with issues affecting people registered as disabled.

• 'Active transport' is impossible for many of us. Car use remains essential for many older people's access to our City, resources and opportunities. Accessible parking (not all relying on having smart phones) therefore continues to be a huge issue for many older people and we believe it should be considered within any transport policy.

• Only 25% of older people over 75 have IT access.

1. Public Transport
1. You can only get cheaper transport tickets if online.
2. We welcome many considerations to promote accessibility issues on B&H buses. Also continued opening of rail ticket offices.

3. We need shorter bus stop intervals. Also on more outlying areas.

4. We need a bus along the seafront. Older people, and others with with mobility issues are excluded from vibrant hubs of central seafront. Could at least one of the 12 bus go along the lower promenade and up Dukes Mound rather than along the upper seafront road. Also 700 to start at the Steine and go along the seafront.(we appreciate it may need to go up to Churchill square at some point to be financially viable).

5. There are too long distances between bus stops , especially from Old Steine to St. Peters Church- renders North Laine area inaccessible. Also Churchill Sq to Waitrose on Western Rd renders shops along that stretch inaccessible. Please reinstate bus stops at King and Queen and Western Rd eg Clarence Square. We have concern about new seafront cycle paths reducing access by car and permanently ruling it out as a bus route?
6. We need beach access for people with mobility problems. This needs addressing urgently if a City promoting diversity and equalities.
7. Door to door community transport eg for shopping is good, but very limited
8. It would be great if new buses don't jolt as they stop- this is a falls risk.
9. Accessible Park and Rides would be welcomed.

2. Car Use is still necessary for many with mobility issues and disability-
1. Distance between bus stops makes reliance on buses difficult for many, especially in more outlying areas.
2. Mobility within the buses (However well adapted) is not possible for some. But wheelchair spaces and reserved spaces are welcome.
3. We appreciate the need to reduce traffic queues and pollution but for people with disability/blue badges no stopping red lines have stopped our access to shops and facilities in some are as further exacerbating our disadvantage.
4. Car use is not only needed for people with physical health issues, but also for many with mental health issues, eg anxiety, and neurodiversity. Cars can be a 'safe space' to enable access to the City and resources, where public transport or active transport is not possible.

3.Parking
1. Needing phones/apps to park discriminates against those who don't have can't use IT.
2. We need to be able to park without having to have Smart phones - For Older people without, or who can't manage, phones, & poorer people who may not be able to afford phone credit. Inability to park increases reluctance to go out, increases isolation and exclusion. We welcome the return of some pay by card meters. This needs extending to all areas. It is said this will be reviewed, but We would like involvement, to be heard, in review of this.

3. There could be scratch off vouchers you can buy in multiples of a £1 could be sold in shops with advertising space on the back to minimise council cost. Also it may result in increased revenue as more people use them

4. Visitor parking permits were really hard to apply for online. It has actually improved recently, hopefully as a result of feedback. Thanks. The system appears to have improved recently for online, but there is no encouragement of application in Council reception areas or by post. These alternatives need promoting.
5. Parking permits are hard to apply for- have to upload documents, then wrong size etc. (Again, this has improved a bit recently if you have already provided documentation. Thanks). Need to be able to take documents in. We have security and data protection concerns about the amount of personal information held by the council for parking permits. Eg Bank statements & utility bills.
6. Visitor permits are expensive and only for 24 hours- we need shorter cheaper ones- expensive, longer visitor permits stop people 'popping in'- increasing isolation.
7. Parking charges and fees remain relentlessly high. We welcome revision of these, at least

in city car parks.
-

4.Active travel, electric vehicles and pedestrian safety

We appreciate the need to encourage healthy lifestyles and clean air.
Unfortunately with some mobility issues for the majority of older people, at some point active travel is no longer possible.

Opportunities for walking for our health and access to facilities and green spaces is generally welcomed by older people. Walking outside is a safety issue frequently reported to us through uneven pavements, especially with tree routes, pavement furniture (signs and tables) etc. This is especially the case in the dark and for people with sight impairments, or who are unsteady.

Shared spaces for cycles and pedestrians are particularly hazardous.
Use of electric Brighton bikes requires internet access.
Whilst electric vehicles are positive for clean air, they remain very expensive, so to reduce parking spaces further for the less well off at this stage is a tension. Wires to houses for charging vehicles can be a trip hazard, although we understand that the Council is taking steps to reduce this hazard.

Brighton Buswatch

Starting with some praise: Much of the current LTP4 has basically offered a cycle and pedestrian only transport policy, with few positives for bus users, apart from some accessible kerbs. This has all changed with Trevor Muten becoming the lead Transport councillor, with his keen interest in bus services.

Since when, we are likely to obtain several red routes, two short bus lanes, and an updated real-time information system (although we cannot blame Trevor for its poor implementation). However, the key concern is- the LTP5 shows little sign of these positive ideas continuing beyond this brief golden age, with its current short-term programme. Especially if we have a change of Administration responsible for the transport portfolio. Beyond this brief positive window, the council's ongoing programme, only relates to items such as supporting bus routes, fare subsidies etc. None of the infrastructure that pays for itself over and over again is mentioned.

So, for Buswatch, the LTP5 is a hugely disappointing document. Whereas other councils let key stakeholders see the later drafts – so as to iron out important issues, before general publication; this was not the case in Brighton & Hove. It has stated that some consultation took place in 2021. Given the policies listed, there are question marks over how much input those connected with bus services had into the drafting of the document.

The main bus company has repeatedly stated that bus priority offers the single greatest help to bus services. This is barely mentioned, and does not appear at all in the forward programme (post 2025/6) at all! Let us first start by examining what a success Brighton's bus services have been:-

Over recent decades, most cities outside London have suffered a substantial drop in bus usage, whereas Brighton has seen at least a 50% increase, to what was the highest ever bus usage. Part of this success has been the unified network, built on positive ideas from the local bus companies. However none of this would have been possible without the positive infrastructure, such as the bus lanes, to make buses acceptably reliable (plus other measures such as the best bus real-time information system available, accessible bus stops etc.).

This increased bus usage has underpinned the regeneration of the city, from the run down eighties, to the vibrant buoyant city we see today.

This public transport solution has prevented more severe congestion problems, had a more car based approach to regeneration been pursued. Worsening traffic congestion within the city would have likely stifled this growth.

Buses are positive in so many other ways, offering a high quality all inclusive travel modes, including for those with disabilities. The high frequency on many bus routes makes it an attractive alternative to using a car, or even needing to own a car. Because Brighton has a lower car ownership rate than most cities, the bus often makes better sense- combined with the good rail connections.

And by offering such an attractive alternative to using the car, it reduces the city' Carbon emissions. All this has been achieved for many years, without any significant council subsidy, including a good night bus network- boosting the evening and night-time economy.

So how does the LTP5 respond to this golden transport mode, which is so essential to the social and economic fabric of the city? In a couple of words- very poorly.

While the report does mention that the city has the highest bus usage (pro-rata) outside London, this appears to be in isolation, not suggesting how this has been achieved, and could be maintained. We only need to look at the success of the express bus routes (1X, 12X, 13X etc.) to see how these could be further developed, if we had even more radical bus priority measures.

There is no mention as to how increased use of bus services has transformed the city. The only other mention of bus usage is to mention that bus usage has reduced slightly since the pandemic. What it does not mention is that bus usage has reduced less here, than in most other areas!

Also the main report fails to mention that the council's household survey showed that for shopping, or personal business- almost half (45%!) of respondents travelled into the central area by bus!, which is at least twice of that who travelled in by car. This important fact reinforces the vital importance buses play in the city's economy, and further emphasises the deficit in current policies towards buses, covered in the LTP5.
This information was hidden deep within the supporting Evidence base (P35).

Looking at LTP5: Starting in the Executive summary:

Challenge 1: should have been encouraging bus usage: This has so many advantages- economically and socially. Conversely if bus services are undermined by poorly designed policies and proposals; then this also undermines so many other bus positives- such as inclusivity, affordability, lowering toxic and Carbon emissions etc.

So where is encouraging bus usage in the list of challenges- it is not listed!

On supporting the transition to Low and zero Carbon vehicles (Challenge 3), the report concentrates on replacing diesel and petrol vehicles, with pure electric vehicles. These scenarios rely heavily on the public being willing to change their propulsion mode, for which there are increasing signs of resistance. Also there is the need for buses to have sufficient range, so that they can comfortably operate all day, without needing a recharge (otherwise there is substantial extra cost from duplicate buses- while the buses are being recharged;

and extra staffing costs).

There is no mention of how the current high bus usage significantly lowers the city's Carbon emissions, and how this should be encouraged. Especially as the Carbon reduction from increased bus usage is underreported, as covered later in this document. This will provide a guaranteed reduction in Carbon emissions.

While some valid points are made in 'creating a more inclusive network' (Challenge 4) particularly for disabilities, the disproportionate coverage of low income families (with some questionable graphics, and the overuse of national data) may not reflect local realities. The over reliance on this criteria, is likely to generate policies that undermine the overall needs of bus passengers.

Objectives:

It is good to see Increase public transport usage is 'Objective 1'. However that is where the good news ends.

If you look at both short term and long term priorities- you will not see bus priority (especially bus lanes) listed at all. The list relies heavily on rail schemes, for which the council has little mandate, and big schemes, for which the council has a particularly poor record.

Even looking at BSIP priorities for 2025 to 2030, bus priority does not appear on the four listed priorities. It is only within one of the eight 'actions' on page 32, that bus lanes (and other priorities) are mentioned. This is hardly a ringing endorsement within the council priorities. There is no other bus priority measure listed beyond this coming year, whereas the A259 Active travel scheme is listed perhaps to 2028.

The council does have a programme of suggestions for cycle and pedestrian enhancements (LCWIP). In addition, by the speed at which the new cycle lanes were introduced during the pandemic, this may indicate that council officers had already spent money on creating these designs, as these were ready to roll out, with weeks.

If only the same was true for bus priority. We have been reliant on Council Muten and the bus companies pushing for the bus lanes, red routes etc. that have been created over the past couple of years.

There was a document, misleadingly called the 'Bus network review', containing a number of bus lane proposals. While it could be argued that this document could have been far better, at least some priority was on the cards. The impression has been gained that this document has been dropped, leaving no bus lane priority measures in the pipeline. This action document is certainly not listed within the Council plan's 2023-27 decision documents, on page 16, whereas LCWIP is.

While signal priority is being considered for the Eastern Road corridor, this is tiny compared to the overall need (and may not be indicative of the best results achievable). At modest cost, East Sussex County council (covering a far larger area); is in the process of adding bus priority to every traffic signal in the county, where buses run. This should be a huge embarrassment to a city that is so reliant on its bus services.

Projects chart: The funding chart could be regarded as misleading.

The figure given is for BSIP funding. By leading with bus lanes etc. (rather than revenue funding- which represents most expenditure), this may leave a casual observer thinking the

council for 2025/6, is spending ten times as much on bus schemes, than most other items listed. This is highly misleading, as the vast majority of this money is being spent on revenue items such as supporting bus services, subsidising fares etc.

While the group are yet to obtain actual figures, the total money spent on bus lanes (etc.), is probably less than £1.5 million. Especially as only 10% of the Western Road scheme is positive for buses, with the rest of the scheme being slightly negative for bus services.

It was also understood that perhaps 29%? Of say £9 million BSIP expenditure should be allocated to capital items. If so, this £1.5 million figure works out at less than half of this allocated figure.

More importantly, this money only covers one or two years. There are no planned bus priority measures for future years, whereas the A259 Active Transport scheme may cost perhaps £6 million. This would be perhaps four times as much spent on bus priority, and is likely to be just one of many schemes.

Thirdly, it should be remembered this is almost the first significant sum spent towards helping buses in many years, whereas the council boasts about its many recent cycle (etc.) enhancement projects. While these environmental improvements can be positive, the needs of bus users also need to be respected.

Valley Gardens 3 could prove to be the most negative scheme for buses, in many years, with the LTP document inaccurately implying bus users will gain from the scheme.

Many potential bus priority schemes can also help cyclists/pedestrians and enhance the environment (especially a possible London Road and Lewes Road shopping area improvement scheme).

No wonder the council wanted to include BSIP funding, within its LTP funding envelope, because it is probable that none of these positive bus measures would have taken place without this BSIP funding, which should be another embarrassment. With the DfT national funding being cut by 5% a year, future BSIP funding could be at risk, certainly in the medium term.

Reducing bus punctuality problems: It has been noted that the main document also omits information about deteriorating bus punctuality.
This non frequent bus service punctuality figure has fallen from 89% in 2011/2 to 75% in 2023/4; in the face of traffic congestion, minimal new bus priority, and road-works.

It is good that the council is trying to reduce these problems. However, instead of trying to eliminate the congestion problems at source, with bus lanes and other priority measures; the chosen solution has been to add extra buses on a route. While the bus companies have been forced to adopt this costly solution, the council does have a choice.

Whereas providing a bus lane is a one off cost, the provision of extra buses is an annual expense. If you were to assume an extra bus costs £250,000 per year to run; over 20 years that would amount to £5 million, and that is just one bus, on one route. This figure needs to be multiplied many times for the whole network.

The council has recently used BSIP funding to finance an extra bus on each of the 24, 26 and 46 routes (totalling say £15 million over 20 years). If the council had not stepped in, this would have to be financed through higher bus fares, which passengers do not appreciate, or allowing unacceptably unreliable services to persist.

However, while a bus is more likely to turn up, adding these extra buses has resulted in more generous timetables, with buses sometimes unnecessarily waiting at bus stops to keep to the timetable. This can make the bus journey excessively slow, annoying passengers, and makes it more likely intending passengers will return to using a car. And, we thought the council wanted to encourage bus usage.

The forward capital programme beyond 2025/6 certainly does not mention Bus lanes or any other bus priorities.

Something that is mentioned (and has the potential to become a serious bus issue), is improving city centre walkability.

If this only refers to pedestrianizing St. James Street, this would not be so bad. However, when the council previously attempted to remove buses from the vital Churchill Square/ Western Road area, they tried to push buses on to the congested seafront. If that is what is intended by improving city centre walkability, that would be disastrous for the city and its bus services.

Quantifying Carbon emission reduction.

There is a risk that over reliance on the Carbon Assessment Playbook could also undermine the provision of bus services.

Firstly, it is fairly likely that the data used for this playbook is based on national averages. The city's bus network is far from average. For a start we have almost the highest bus usage, and run a number of hybrid vehicles, which further reduces the Carbon footprint of our local buses. Our bus lanes are generally in the right position, which is not always true in other areas. This tool has the potential to be quite crude, and unrepresentative. Especially as the background CCC National balanced pathway, does not give improved model choice, as a separate heading towards reducing Carbon emissions.

Secondly, the city will also soon be getting a number of electric buses, presumably using Carbon neutral electricity- so further reducing the Carbon footprint of buses.
And as the years roll by, this number of electric is likely to multiply (so further reducing overall footprint, of buses). With this plan we are looking towards 2035, so also need to look forward, with buses playing an increasingly important part.

Thirdly, nationally, the government previously suggested that three people in a small car produce less Carbon emissions, than the same people travelling by bus. This is ridiculous.

As the bus is already running, so the Carbon emissions have already been accounted for, by existing passengers. So the extra Carbon cost of having three additional passengers using the bus is tiny.

On the other hand, the entire Carbon footprint of running an extra car would need to be added to the city's total. So the suggestion that car passengers can ever produce less Carbon per passenger mile than when travelling by bus, is ridiculous.

Similarly cycling and walking may have gained over prominence in policy. When the national average Carbon footprint is utilised for comparison with buses the marginal Carbon footprint should be used instead, as it better reflects reality.

If a cyclist chooses to instead use a bus (perhaps because it is raining), then the extra Carbon produced would be minimal, because the bus is already running, and the Carbon

footprint has already been assigned to the passengers already on the bus.

The opposite is also true. If we lose a bus passenger, the Carbon footprint of the bus would remain almost the same; but use of some alternative travel modes may well add to the city's Carbon footprint.

Given the unbalanced nature of this LTP5 document; which does not recognise the essential nature of bus services to the city; it is difficult for Brighton Buswatch to give this Local Transport Plan our full support.

British Regional Transport Association (BRTA)
I am a member of the British Regional Transport Association (BRTA), which is a small unincorporated voluntary association which subject to resources, seeks to advance towards better public transport across the United Kingdom. Indeed, we are very keen to see a rolling programme of local line reopenings, rebuilds and select new builds of conventional railways for passenger and freight. We also campaign for an environmentally friendly, integrated, comprehensive, inclusive and affordable transport system including buses, cycling and pedestrian facilities.

Website: https://brtarail.com/

1. The three main items include Climate Change; Local Environmental Impacts and Transport Network Performance Issues. Active Travel(walking and cycling) is also very important.
2. Several disused railway lines should be re-opened where the old trackbeds survive plus also existing(or future) railway infrastructure improvements:
- Lewes-Uckfield;Tunbridge Wells-Eridge and Horsham-Shoreham which will all bring much-needed capacity to the Brighton Main Line. All these lines will serve areas with housing developments.
- BML2 - Purley - Elmers End (including spurs at Edenbridge), and then Lewisham - Stratford.
- A curve should be built at Arundel linking the Mid-Sussex Line with the Coastway Line.
- The Wealden Line and the Marshlink Lines should both be fully electrified.
- The Polegate-Stone Cross curve should be re-instated to allow through Brighton-Ashford/Hastings rail services, plus links with wider Kent and the Channel Tunnel(and vice versa) . It could also include possible freight benefit(including Channel Tunnel/Newhaven/Shoreham/Portsmouth/Southampton). Meanwhile the A259 South Coast(Brighton-Eastboune) along the west approach of Seaford Exceat Bridge with narrow links is causing pedestrian/cyclists creating traffic flows with vehicles, together with climate change impacts and would discourage active travel such as walking and cycling. Furthermore 1500 new homes in Newhaven and 500 in Seaford would benefit for this new rail link.
- A new railway line linking Gatwick with the Redhill-Tonbridge line is needed to enable direct trains between Kent and Gatwick Airport and will also bring capacity to the M25.
- Haywards Heath-Horsted Keynes - to connect with Bluebell Railway.
- Gatwick Airport Station upgrade.
- Croydon bottleneck.

3. Delays caused by congestion in your city are one of the highest outside London
4. Pavement parking is very high in your city.
5.More direct train and bus services to key destinations such as protected buildings and landscapes, including the South Downs National Park.
6. More trains and buses on Sundays
7. Raised kerbs for bus stops to encourage disabled people
8. All new trains should have level boarding, and that station platforms need to be adjusted. Also non-visible disabilities such as autism and dementia need to be addressed.

9. All operators should be joined with Southern Railway's KeyCo. smart card initiative, with rail fares with bus trips added on at both ends of the journey.
10..Requesting free and subsidised train and bus fares for all young people 18-30 years.
11. Rolling out under-65s concessionary bus passes would boost ridership making the case more for retention of bus services
12.Retrofit low-carbon engines to existing bus vehicles
13.Electric cars can still emit 2.5PM particles thereby shifting towards public and community transport.
14. Trams and light rail schemes could help deliver a sustainable transport network.

Bristol Estate Leaseholders and Tenants Association (BELTA)
Areas like Bristol Estate suffer from two main challenges, firstly, the geographical location, being at the top of the steepest hill in Brighton, compounded by a limited bus route, creates an access issue to many residents to vital services, such as the nearest GP surgery (Over an hour via public transport).

Secondly, the hospital provides a unique challenge as traffic flow is important in and out, and currently, it doesn't follow the typical design of other hospitals, such as Red Routes on the hospital approach to prevent impediment of emergency medical vehicles.
A common criticism received when talking about road design is that it doesn't always follow good, logical design, or typically has some major flaws in how it would be implemented. For example Kingsways road-based cycle lane, next to the pavement-based cycle lane, doesn't add to a cyclists capacity to travel, but on balance negatively affects motorists.
Red Routes tend to be unpopular by nature, but they do have a very strong effect on clearing traffic from those areas so far. Residents have stated that they are quintessential to keeping hospital routes open and clear, and to prevent loopholes from double yellow sections.

CPRE Sussex, the countryside charity
It's right that the plan aims to encourage active travel and public transport, and to cut carbon emissions.

But we're concerned that the actions proposed are insufficient to deliver these bold ambitions - and there is little vision about the potential for creating better places if we take cars out of more of the city centre, and worrying little attention paid to the impact on the urban fringe and our precious countryside.

If we're to deliver on climate, air quality and congestion, and to create spaces for people, we need to see private car use falling in the city - while ensuring that protections are in place for people who need to use cars, and decarbonising the car use that remains.

Shifting journey use to active travel and public transport will likely need bolder policies around Low Emission Zones, a reduction in parking places in the urban centre and so on, and the reallocation of 'road' space to other uses (walking/wheeling, places for sitting, pocket parks and green infrastructure, etc). Charging measures are likely to be needed to generate the funding for transport alternatives.

We remain unconvinced that Park and Ride will deliver on critical transport aims. A recent evidence review on Park and Ride found that it increases car kilometres travelled and has a negative impact on modal split – i.e. Park and Ride means people use their cars more, rather than less. Https://www.climatexchange.org.uk/wp-content/uploads/2024/02/CXC-Reducing-car-use-through-parking-policies-August-2023.pdf

Furthermore, we would strongly object to the creation of Park and Ride sites that have a negative impact on the National Park or its setting, or on the urban fringe or green spaces.

We would support local neighbourhood hubs if they are combined with other transport policies that encourage modal shift towards active travel and public transport, and reduce overall car use.

East Sussex County Council
We support initiatives and interventions that help improve journeys for businesses, residents and visitors between the local authority areas of East Sussex and Brighton and Hove. This is particularly given the close relationship between Brighton and our coastal communities of East Saltdean, Telscombe, Peacehaven and Newhaven, and also those that use the A27 corridor to access the city from Lewes and central East Sussex.

You may wish to draw attention to keeping the city connected. Brighton has a thriving visitor economy, and connectivity by road, rail, air (Gatwick) and maritime (proximity to Newhaven, Shoreham etc.) is important to ensure visitors and goods can get to/from the city. We have learnt through our recent consultation on the draft East Sussex Freight Strategy that the movement of goods can be considered as important as the movement of people and can be overlooked or not fully appreciated. As such, there should be reference to freight beyond some references to consolidation centres. It would be useful to understand how you see freight moving around - whether that be strategic movements (most likely to/from or through Brighton & Hove, or deliveries to retailers or personal addresses, particularly in communities where you reallocate road space towards active travel. As a neighbouring authority we would be happy to work with you on freight opportunities that may benefit both residents, visitors and businesses of East Sussex and Brighton and Hove, particularly along the coast towards Newhaven and Seaford or via the A27 towards Lewes.

We are in the process of reviewing and updating our Local Cycling and Walking Infrastructure Plan (LCWIP). We would be keen to work with you on cross-border trips along the A27 and A259 to help our communities undertake active travel trips for both leisure and commutes on these corridors. We have successfully worked together before on cross border trips with the A259 bus lanes from Peacehaven to Rottingdean, which has contributed to improved bus journey times for passengers along this popular cross authority corridor, and the Falmer to Woodingdean cycle route improvement providing an active link to/from the Amex Stadium.

We note that whilst you emphasise an inclusive transport network, there is no reference to the importance of undertaking an equalities impact assessment (EqIA). An EqIA can help support the justification for interventions and initiatives and help understand what and where other challenges are for people who identify as having one or more protected characteristics. Likewise, we suggest that a health impact assessment (HIA) is also undertaken to support your strategy. When developing the East Sussex Local Transport Plan 4 (adopted October 2024), we used both the EqIA and HIA to inform the development of the strategy. We're happy to work with you and learn from any items that arise from these studies that affect cross boundary journeys between our local authorities.
We have shown support for your objectives where they align with the fourth East Sussex Local Transport Plan (adopted October 2024), and any support is focused on cross-boundary connections, rather than specific considerations elsewhere in the city. An inclusive transport network is a key strand of our Local Transport Plan and we welcome that within yours, as this will support cross boundary journeys for all users. We support the principle of increasing the number of public transport trips that cross the border between our authorities along the A259 ('Coaster' bus services) and A27 ('Regency' bus services and rail route) corridors. We note the reference to park and ride at Falmer and would welcome further study / information into this aspiration/proposal to ensure that any park and ride opportunity does not extract existing cross-border public transport trips from the Regency bus routes (28/29/29a) between Brighton and Lewes (with direct through links to other large towns in

East Sussex) or train services between Brighton and Lewes (with direct through connectivity to towns along the coast as far east as Ore). Any extraction from the existing public transport offer would increase private vehicle use within East Sussex, bringing its own challenges for our authority and only benefit Brighton and Hove in terms of public transport trips, when users transfer to a park and ride offer. We note the scale and ambition for expanding your EV charging network. It would be beneficial to understand how you plan to deliver the 100 rapid chargers and whether you need any support from the private sector. We would also welcome references on how you will meet the increased electricity demand and how the grid will cope or renewable energy will be used. In developing the fourth East Sussex Local Transport Plan, we established that modal choice was important for our communities, both urban and rural. Whilst we appreciate the challenges that Brighton and Hove faces are different to those faced by East Sussex, we feel it is still important to provide cross-boundary modal choice of people travelling between our geographies. The public transport (bus and rail) networks are focused on the A259 or A27/A270 corridors into Brighton, with people requiring a change of bus or train to continue to communities in Hove or north Brighton, which adds journey time, making these modes less competitive against the private car. Modal choice is important for residents, visitors and commuters who have limited modes available to them for a variety of reasons including disabilities and other commitments where their needs are not met by shared or active transportation modes.
We have chosen not to rank your projects to achieve your objectives, as we appreciate that these are matters that largely impact the city of Brighton & Hove. That said, we support initiatives and interventions that support cross boundary journeys by all modes (walking, wheeling, cycling, bus and private vehicle).
With regard to Sussex Coast Mass Rapid transit, this is something that is not explicitly mentioned in LTP4. We refer to these as bus enhancements and faster rail journeys. Both rail and bus provide mass transit opportunities at present with turn up and go frequencies (up to every 15 minutes) between Brighton and Lewes (by bus and rail) and along the A259 (by bus to Peacehaven, Newhaven, Seaford and Eastbourne). Furthermore, the term mass rapid transit often evokes visions of light rail (tram) or heavy rail modes (train) within the UK, and there is a need to undertake further studies to understand what this ‘mass transit’ intervention could look like.

East Sussex Fire and Rescue Service
Challenge 1 stated there were 146 serious injuries or deaths by collision recorded in 2023. The prospect of the road safety action plan to reduce the number of KSI's sounds timely as BHCC are heavily promoting to increase the volume of cyclists by providing additional parking and a suite of schemes as detailed in the transport plan.

A core response function statistically of the fire service is for rescue activity's related to RTC's (road traffic collisions). The plan does not demonstrate a proportionate strategy to cope and protect the increase of cyclists BHCC are promoting. The project "improving safety" under objective "deliver a safe, inclusive and integrated transport system" does not outline what risk mitigation BHCC hope to employ. With reference to figure 13, it would appear this is a community driven scheme rather than infrastructure enhancements. While education for road users is important (as currently delivered by the bikeability scheme), this is not as effective as physical controls. We would urge you to consider what physical controls can be implemented throughout the city road network to better protect this group of vulnerable road users.

Challenge 3 - For consultation purposes, ESFRS hope to collaborate and see BHCC demonstrate a robust plan to manage EV risk when setting out to achieve its carbon neutral goals. While BHCC have stated they are currently developing a separate and dedicated electric vehicle charging plan, on the consultation homepage BHCC have stated a three-year plan to install 1600 charge points in addition to the current BHCC funded "lamp post" charging points.

It is a core requirement of each fire service to undertake a community risk management plan which forensically examines statutory requirements and local risks within a fire services core operating area through historic data and consultation. In this assessment of risk, collaborative working is key so the fire and rescue service can understand the potential risk to the public by BHCC implementing this infrastructure. HV-rapid chargers (currently in operation to support public and taxi use), increasing substation capacity's of volume change the type of risk within the city. Considering access to these risk areas and proportionate remote isolation when things go wrong is key for a quick emergency response.

While the plan is still being developed, there is no evidence of what BHCC have planned to do in respect of education for public access charging point users. Education on safe use for these points is key to reduce points of failure.

Parking - EV parking in multistorey car parks carry's a great risk in two strengths which we are confident BHCC are considering. For purpose of consultation;

1. Building collapse - EV's are heavier by design and with recent plans to increase B category licence weights to 4.25 tonnes for van derived EV vehicles, compounded by a general higher volume of heavier vehicles this means multi-story carparks need to have a robust assessment of what structural integrity these buildings can offer. Building owners (private or LA) must manage the safe working loads of said structures robustly to prevent a building collapse.
2. Fire - fires in multistorey car parks are very challenging to manage with a standard ICE vehicle (internal combustion engine) EV powered vehicles are extremely volatile which ramps up when thermal runaway begins. Fire prevention measures in buildings should be considered due to how volatile this technology is.

ELEVATE research team
On behalf of the ELEVATE research team I would like to submit research evidence including Brighton & Hove resident feedback relevant to the ‘Our City Transport Plan 2035’ consultation.

Our 5 year research project (2021-26) carried out national and local level data collection focusing on the cities of Brighton and Hove, Oxford and Leeds. We conducted national, city and neighbourhood-level surveys to investigate interest in and use of e-cargo bikes and other e-micromobility modes. Our focus neighbourhoods in Brighton and Hove were Preston Park and Hove Park. A major part of the research involved loaning e-cargo bikes to 49 households (15 in B&H) living in our study neighbourhoods for one month during summer 2023 and to 11 of those households (4 in B&H) for a further 6 months the following winter. Our findings show that e-cargo bikes represent a realistic and desirable form of mobility, with the potential to reduce car use and associated emissions.

Historic England
Historic England would support solutions and programmes that minimise the impacts of transport on the historic environment, heritage and townscape and that seek solutions that deliver long-term environmental benefits. We would also support integration of transport solutions into streetscape and the public realm, particularly in historically sensitive locations such as conservation areas and within the setting of listed buildings and other heritage assets (e.g. registered parks and gardens).
Historic England’s guidance on public realm in historic locations, ‘Streets for All’, which has been developed in conjunction with the Department for Transport, includes practical case studies and can be viewed at: https://historicengland.org.uk/images-books/publications/streets-for-all-south-east/.

Historic England welcomes the opportunity to comment on the City Transport Plan due to:
• the role the historic environment can play in influencing a plan's objectives, as for example enhancing public realm in historic centres and streets;
• the potential direct and indirect impact of a plan's proposals and programmes on historic remains, features, sites, townscapes, and landscapes; and
• the opportunities for new transport measures to promote and enhance access to and enjoyment of the historic environment.

Hove Civic Society
The Trustees of Hove Civic Society have considered the consultation documents for the City Transport Plan 2035 and make the following comments:

There is much to commend in the consultation document, here we comment on those matters that we feel need to be improved.

Land grab by increasingly larger vehicles
The Transport Plan consultation document is silent on the central issue of land use and the growing space requirements of cars. The growth in length, width and weight of cars, not least the electric vehicle fleet, puts an increasing pressure on our streets and makes traffic movements and road safety more difficult. New cars are increasingly too large for standard parking spaces, extend into the highway and take excessive space from adjoining parking spaces. The growth in vehicle sizes in effect reduces car parking availability.
In this context we are deeply concerned about the continuing development of vehicle cross-overs across pavements, parking in front gardens and conversion of private green areas throughout the city for parking purposes. This trend undermines efforts to green up the city. It is an issue that affects both transport and city planning.
We would urge the council to look at the land use impact of these developments – an effective "land grab" – and look at solutions to deal with this. We cite the efforts of the city of Basle that has varying parking fees according to the size of cars, where only the smallest cars are charged a normal fee with larger cars double and very big cars treble parking fees. Regrettably some of the largest and heaviest cars on the road now are electric. One way of compensating for that additional pressure would be to remove an existing adjoining parking space for each electric charging point and landscape it. This would demonstrate that electric vehicles are not just a substitute for traditional vehicles but that they signify an environmental change, which brings a more sustainable environment with it.

Better balance between investment for car-based and other modes of transport
As set out in the consultation document, transport planning should contribute to net-zero policies, health considerations and equality considerations. Most importantly, we believe, it should also reflect the makeup of transport users and transport modes in the city and give appropriate attention and budget to the approx. 40% of households in the city that do not have access to a car. Walking is an important mode of transport!
We should create a better balance between policies for cars and walking and cycling - especially in our inner urban areas with the emphasis swinging towards the more sustainable modes of transport.
This means for example: better and wider pavements at the cost of reduced car parking.

Transport planning can help create a greener city
We would suggest that any highways work such as widening of pavements or other "build outs" should by default optimise landscaping and new trees. The cumulative impact of such a policy would over the years fundamentally improve the climate resilience of our built-up areas without adding significantly to costs. We would also suggest some creative thinking - coupling this approach with the requirements for biodiversity net gain for new developments, helping to secure funding for greening up including rain gardens and associated maintenance.

This might require some changes in the City Council's highways' contracts and also in the procedures leading up to approval of highways projects. In essence we believe all improvements to ground surfaces in the city should by default be heavily influenced by landscaping advice.

Explicit recognition of transport planning provisions in the Hove Station Neighbourhood Plan
We draw your attention to the need to recognise the policies and provisions for transport in the Hove Station Neighbourhood Plan which are set out below. The plan is a statutory document which has been subject to exacting public consultation requirements including a public referendum.

Other comments
Once again we make the plea for plans to improve Church Road (our own Hove Boulevard) to be accelerated, as a demonstrator for more sustainable urban living.
And we would welcome your suggestions, albeit at an embryonic stage, for a Sussex Coastal Mass Transit.

Living Streets Brighton and Hove
The city is still poor on pedestrian safety. Vehicles are given priority in terms of access and speed. This is in spite of walking (and wheeling in wheelchairs etc) being the universal mode of transport, and the most vital for the poorest and most vulnerable in society.
New technology is unlikely to help pedestrians.
There is a lot to admire in the objectives and principles of the Plan. The only serious omission from our perspective is the lack of detail on proposals to improve the walkability of the city, especially safety.
Our City Transport Plan 2035 – Response from Living Streets Brighton and Hove

We welcome the opportunity to contribute to the development of Brighton & Hove City Council's Transport Plan 2035 (LTP5). We were actively involved in earlier drafts of the Plan in 2021.

Living Streets Brighton and Hove1 is primarily concerned with creating safer, cleaner, greener streets and neighbourhoods to create a better walking environment and inspire people to walk more. We have therefore only commented on issues for walking (which we always mean to include wheelchairs etc.).

We warmly welcome the emphasis in LTP5 on "Enabling more people to live safer, healthier and more active lives" (Challenge 1) in view of now extensive research showing the physical and mental health benefits of walking. We are also pleased to see a focus in the objectives on delivering a safe and inclusive transport system (objective 3) and creating well-maintained streets and pavements (objective 4). We are glad that Objective 5 recognises the importance of providing
active travel choices for all and excellent public spaces.

However, while there are useful suggestions in principle to support walking in the city, there is currently very little focus in the plan on practical steps to tackle the everyday problems which reduce people's willingness and ability to walk, and insufficient funding for this vital aspect of mobility around the city.

Inclusivity
There is some recognition in the Plan of the importance of walking in creating an "inclusive" transport system. The Plan recognises that "20% of households in the lowest income bracket typically make the most trips on foot and are the only income group that make more walking trips than car trips" (page 27). It also states that while feedback on the ease of use of

pavements and footpaths by people with disabilities is in line with the national average, at 41% this is a low overall score (p28).

As the Plan makes clear, “A transport network that prioritises walking and bus users is one that makes it more inclusive for all” (p28). In spite of the recognition of the importance of walking, especially to the poorest and most vulnerable people, the only specific measure to improve the situation mentioned in the Plan is dropped kerbs at crossing points, which is very disappointing.

Pavement obstructions
There is welcome recognition that “Better pavements in the city, that are free of obstructions” help make walking an attractive option (p19). However, the Plan does not spell out what these obstructions may be, nor include any proposals for dealing with them. As we pointed out in our earlier input to the development of this Plan, pavement obstructions include pedestrian guard railings, wheelie bins on the pavement, communal bins blocking crossing points and sight lines to avoid oncoming traffic, excessive signage – almost always for motor vehicles - which blocks pavements, traffic signal control boxes, electric vehicle fast charging boxes and associated signage and pavement parking. There is not a single mention in the Plan of any of these issues, although there are plans to extend EV charging points.

A very simple, inexpensive and immediately noticeable action would be removing the pedestrian guard railings at road crossings and elsewhere (often apparently installed for no apparent reason). There is now clear evidence that removing pedestrian barriers significantly reduces collisions: a fall of 56% in pedestrians being killed or severely injured (KSI) and a fall of 48% in the number of all KSI collisions - https://content.tfl.gov.uk/pedestrian-railings-removal-report.pdf. It would make a major contribution to creating safe and welcoming streets to remove all pedestrian barriers across the city as a priority. Removing them would show residents and visitors alike that the city welcomes people walking.

All obstructions on pavements are dangerous and discourage people from walking – people are so often forced off the pavement into the road simply because the pavement has become too narrow to use safely.

We recognise that it is part of the character of much of the city that we have narrow streets with narrow pavements. That is part of the charm and attractiveness of the city. But the lack of any strategy to tackle obstacles on pavements for people walking – especially those in wheelchairs, pushing buggies, children, those who have disabilities and/or visual impairment, or
are just elderly and more anxious about falling and more likely to be seriously injured in a fall – is simply no longer acceptable in our city.

Safety and funding
We welcome proposals for a new Road Safety Action Plan that “sets out targets on reducing casualties on our roads and what actions we will take to achieve this” (p16). Unfortunately, there is no further information about what this might cover, nor how this might affect pedestrians beyond a mention that it will include an “annual programme of accessibility improvements for pedestrians”. We very much hope there will be sufficient consultations with all the relevant
groups to develop this plan, including ourselves, so that the benefits to pedestrians are fully considered as well as those to cyclists and drivers.

We are also pleased to see that the Safer Better Streets programme is ongoing, part of meeting Objective 4 to “Create well-maintained streets and pavements” (p30). However, we note that almost all the proposals focus on roads, except for the final sentence which promises to “ensure that pavements on the most important active travel routes are

considered in the maintenance schedules" (p34), our emphasis added. This is really not sufficient attention to the importance of maintaining pavements in creating safe and attractive routes for people to walk.

The lack of importance in the Plan of pavement quality and the needs of pedestrians is amplified by the budget allocations under this objective: £415,000 for Safer Better Streets; £3,950,000 for carriageway maintenance. This is in spite of an increase of central government funding for maintaining roads and pavements for 2025/6 of 83%, to a total of £5.3 million. It seems that the maintenance of pavements will receive only a tiny fraction of that funding, in spite of their importance for everyone in the city.

Finally in terms of safety for pedestrians, we note that there are no proposals to reduce speed limits throughout the city. The Plan says that "Most of the city's residential roads are now 20mph" (p13), emphasis added. This is a surprise given that it has been very difficult in the past to find detailed information about which roads are actually 20mph.

No new roads have become 20mph since the last review in 2015, since when the case for reducing the speed limits in towns and cities has been widely accepted in terms of safety, and 20mph default speed limits are now used in urban residential areas throughout the UK. The problem with the situation in Brighton and Hove currently is that there is very poor enforcement of speed limits
and dangerous driving, and the use of 20mph speed limits is extremely piecemeal, with drivers being unsure of which roads have this speed limits.
We recognise that lowering the speed limit is not an immediately popular move politically but, given the benefits of lower accident rates, fewer deaths and fewer and less serious injuries caused by speeding traffic, we suggest that things must change. People are put off walking because of fear of dangerous driving as the Plan recognises: "fears about road safety are a significant barrier
for many people adopting more active travel" (p4 and p19).

The last review of a city-wide 20mph speed limit was in 2010 and a great deal has changed in Brighton and Hove over the past 15 years. It is clearly time for another review.

Looking forward
Finally, we are very pleased to see that the focus of the "next major scheme" to improve travel and transport in the city will be to "deliver city entre walkability and accessibility improvements", focusing on key locations such as "routes between the train station and the seafront" (p7 and p35). This will be a very welcome development.

We look forward to hearing more in due course about that walkability scheme among other improvements and hope that we can assist in the development of specific proposals.

the carers centre for brighton and hove
When targeting accessible, inclusive transport, it is important to include people whose mobility is so limited that they require door-to-door accessibility

Metamorphosis Art Group and The Flamenco and Spanish Group
People who drive vehicles cannot afford electric ones. Only very few can. So over supplying electric charging machines which will add pavement furniture when far fewer electric cars than catered for will be using these machines, will be both an obstruction, causing injuries with leads everywhere for disabled and pedestrians, and a waste of money. You can only put these machines in designated out of town locations which are purpose built so as not to cause possible tripping injuries or obstructions for pedestrians and mobility vehicle users. Don't over compensate because you think we should be using all these electric vehicles and yet won't be, in most cases.

Very few will use driverless cars. The road system needs to be taken back to its pre 1980s system whereupon all side roads from the Level to the seafront were both way traffic so traffic could filter in and out and we did not have that huge queue down the centre of Brighton, as no one can exit side roads easily. The problems arose when the Council decided to put in the bus contraflow system from the seafront up towards London and Lewes Road and blocked many of the side roads off and made many on way. All this encouraged was traffic unable to exit and join and having to go all around a long one way system to get to where they wished through he side roads. Adding the bus lanes on ancient roads built for horses and carts was not practical and unviable. You cannot squeeze large trucks, bikes, buses and other transport all into one lane in many cases, without creating standstill and bottle necks. Subsequent road planners have each made a pig's ear of their "improvements" as they had a poor design to start with. The traffic used to run like a Scale Electrix track figure of 8 where the crossover for all traffic was at St. Peter's Church in both directions. Traffic all ran down the left hand road to the Steine using both lanes and then curved around at the bottom of the Steine and all traffic came back up on the western side of the road. The London Road and Ditchling Road were two way to all traffic. The main bus depot and waiting room and toilets for the drivers and conductors were at the Steine. This meant visitors as well as residents could easily access most of the buses from the seafront in both directions coming and leaving town.
There is NO money for vanity projects which usually don't work (i360 comes to mind when the public said waste of money beforehand).
Just concentrate upon a clean and well run and maintained road and transport system without adding too many bells and bows, which never work and waste money.

National Highways
We are concerned about the safety, reliability, and operational efficiency of the Strategic Road Network (SRN), in this case the A27 and the A23.

We have reviewed the Plan.

We would like to highlight that in in terms of national transport policy, you need to be mindful of the Department for Transport's (DfT's) Circular 01/2022 'Strategic road network and the delivery of sustainable development' (December 2022) which is the government's policy for the SRN: **https://www.gov.uk/government/publications/strategic-road-network-and-the-delivery-of-sustainable-development/strategic-road-network-and-the-delivery-of-sustainable-development.**

This sets the policies and priorities for the SRN. It emphasises the need for a vision-led approach to development that manages down traffic impacts by promoting sustainable and active travel and internalising movements for larger developments. This vision-led approach to development now features in the government's National Planning Policy Framework (NPPF): **https://www.gov.uk/government/publications/national-planning-policy-framework--2.**

There is also the government's Road Investment Strategy (RIS) which sets the priorities for investment in the SRN. RIS 2 concluded in March this year. RIS 3 will cover the five-year period from 2026-2031. The government published the interim settlement for 2025/26 in March this year: **https://www.gov.uk/government/publications/strategic-road-network-interim-settlement-2025-to-2026.**

We are drawing this to your attention because the interim settlement is clear that for RIS 3 the focus will be on maintenance and renewal of the existing network (see para. 4.3). Not all schemes listed in the Pipeline in RIS2 and considered during Road Period 2 will be progressed as Pipeline schemes in the next road period. An updated list of Pipeline schemes will be published in RIS3.

Given this context, we welcome the promotion of sustainable and active travel. This can help support a shift away from the car as the main mode of transport which can help alleviate pressures on the roads, including the SRN.

The Carers Cantre for Brighton and Hove
When targeting accessible, inclusive transport, it is important to include people whose mobility is so limited that they require door-to-door accessibility.

Transport Action Network
Please see below for my comments on Brighton & Hove's Local Transport Plan to 2035.

Overall there is much to commend in the plan and I broadly welcome its priorities and focus to make a more equitable and fairer transport network, to reduce transport's negative impacts and to make it more attractive to travel in the city.

However, there are some serious issues that are not addressed, or only partially addressed, which need greater thought if the 5th LTP is to deliver the changes required.

Key issues with the LTP include that it appears to give no consideration of:
1. A Vision Zero approach to road safety
2. The need for greater adaption measures for climate change - the need for more shade from street trees and greater SUDS for example - where is the strategy to reduce on-street car parking to enable this?
3. Demand management measures particularly with regards to cars entering the city, such as through car parking costs and numbers.
4. Park & ride's impacts on regular public transport services (rail and bus) and transport related social exclusion as well as the South Downs National Park
5. On and off street cycle parking for traffic generators and improving its security
6. Promotion of e-bikes and mobility scooters and their charging needs (it shouldn't be just about buses and cars)
7. Better spring and summer maintenance of shared paths (cutting back green growth)
8. Better autumn and winter maintenance of all pavements for the benefit of elderly people to make sure they do not become trapped indoors.
9. A full pavement review and the need for better standards for pavement widths and dropped kerbs, better bin control and action to ensure that the large rollout of EV chargers does not lead to them being placed on pavements apart from in exceptional circumstances
Below are some comments, positive and negative on the various elements of the LTP:

Challenge 1 - there is a good acknowledgment of the issues but the key omission is any clear ambition to reduce casualties to zero, i.e. there is no mention of Vision Zero and of designing out road danger at a systems level. This is important if we are to drive real change to reduce the number of people killed and seriously injured on our streets. There is also the wrong categorisation of incidents as accidents.

Challenge 2 - welcome the acknowledgment that buses and cycling can improve traffic flows and are more efficient ways of moving large numbers around the city. While it is acknowledged that building wider roads just increases traffic, this is also true for other ways of increasing capacity/improving flow such as more efficient signalling. In addition, while parking in the centre remains attractive with many thousands of parking spaces, people will continue to drive there. In short some demand management measures will be needed to achieve the desired outcomes.

The idea behind the mobility hubs is sound but it would be useful to understand how many are envisaged for the city and their distribution. Regarding the larger park & ride sites, it is

disappointing to see this being pursued yet again when it wastes so much time and energy and delivers very little. None of the downsides of park & ride, such as how it undermines existing public transport and only works for people who drive into the city are considered. Neither is the impact it would have on the National Park due to its location within the National Park or its setting and the increased traffic flows it would generate through the South Downs.

By undermining existing public transport it potentially increases transport related social exclusion as rural people reliant on buses (and possibly trains) will have less choice while people without a car who want to access areas outside the city are similarly negatively impacted. It would be far better to link park & ride to train stations around the region, to boost services rather than undermine them. This would create pressure on the train operating companies (around until April 2028) for better weekend services to serve visitors and tourists. Thereafter thought needs to be given as to how improvements could be achieved. However, this will only be affordable by increasing passenger numbers and not deterring people travelling by trains into the city.

Regardless of where or how park & ride is developed, without demand management measures to dissuade people from driving into the city centre, such as more expensive parking and reduced spaces, there will be few space and congestion benefits from this policy and it will likely increase car use. Only by taking out space for cars, will the city be made more attractive for visitors and residents alike.

As part of this challenge it would be good to see a long term reduction on on-street parking, incrementally delivered to enable more street trees, SUDS, EV chargers, etc, especially in the central area. Doing it in this way would enable people to see the benefits and build support for it.

Challenge 3 - It is wrong to say there is uncertainty over whether heavy vehicles will follow a hydrogen or electric path. The consensus is that electric is the way to go apart from some bespoke vehicles. Therefore the city needs to be planning on that basis. What is disappointing in this section is that there is no mention of e-bikes of mobility scooters. Both are likely to increase in use, especially mobility scooters with an ageing population, yet no thought is given as to how to provide charging for these vehicles. Given their smaller footprint and more effective use of space, they should be a priority over private cars.

Challenge 4 - transport related social exclusion will be prevalent in many areas, not just in the areas where it is most prevalent. It's not just about subsidised bus services in a few areas but better buses all over and in particular cheaper fares.

Better active travel is also important as these are low cost solutions but people are deterred from using them, particularly cycling where a perception of road danger is real disincentive.

Challenge 5 - It should be recognised fewer motor vehicles would reduce wear and tear on the city's roads and reduce maintenance costs. Fewer crashes and injuries through a Vision Zero approach would also reduce costs.

Objective 1 - fully support apart from park & ride which is likely to undermine regular bus and train services and worsen transport related social exclusion. Would also like to see greater ambition on influencing rail services especially longer term such as faster services on West Coastway to help reduce the number of cars coming into the city.

Objective 2 - Fully support, but this should include e-bikes and mobility scooters. Currently there is no consideration as to the needs of these modes.

Objective 3 - Fully support but it needs to go further and advocate Vision Zero to deliver real and lasting change. Also, the transport hierarchy needs following placing the needs of people walking and cycling at the top of all considerations. There should also be some 20mph extension, such as up Ditchling Road from Fiveways to past Varndean and the park entrance opposite, to reduce road danger. Alongside this more measures should be implemented to address areas where the 20mph speed limit is being regularly flouted.

In terms of improving accessibility to rail stations, Moulsecoomb stands out as urgently needing attention, especially because of its importance for students and staff working at the University of Brighton.

Objective 4 - Fully support but this would benefit from traffic reduction measures and making the link would be helpful here.

Regarding cycle routes and shared paths, there needs to be better maintenance of plant growth in spring and summer that reduces the usable width of routes pushing people walking, wheeling and cycling into conflict. This needs to be better managed than at present. Routes most affected include those in less central areas. In terms of surfaces, the Level is extremely poor.

Regarding pavements, the removal of leaves and ice needs to be prioritised where there are more older people as falls by the elderly can be terminal, even if not immediate. This means considering more than just priority central areas. At present it is often safer for people to walk in the road, even if this exposes them to other dangers and of course many elderly people won't do this, so in effect can become trapped indoors.

Objective 5 - Fully support but this needs to go further to commission a full pavement review and revise standards to be more inclusive. A 2m width should be the minimum width considered for new pavements as with lamp posts, signs and bollards this is reduce down to around 1.5m. That's before considering the impact of A-boards, bins and other obstructions such as EV chargers. Regarding the latter these should be banned from pavements unless the pavements are wide enough to leave a 2m clear width with the charger installed.

Dropped kerbs should be 2m as standard for greater inclusivity. 1.2m and 1.6m are not wide enough to comfortably allow people to cross at the same time in opposite directions, and often don't reflect the width of the pavement either (see the A259 proposals).

On street cycle parking for destinations such as shopping areas, gyms, supermarkets, hospitals, needs to be part of the plan yet is not mentioned despite, for example, the cycle parking at the Royal Sussex County Hospital being virtually full up most of the time. It also needs to be more secure so that people can be sure that they will find their bike still there when they return. Combining this with e-bike charging also needs to be considered. Otherwise without better and more cycle parking the current situation risks being a constraint on increasing the numbers of people cycling.

Finally, there has been no mention of the need for adaption at a time of increasing climate change. One of the key things that will be needed in the future to keep people walking is more shade from street trees. Also there is a need for more SUDS to reduce water run-off during heavy rainfall. Removal of some on-street parking will be essential to enable these features.

Objective 6 - Fully support but would urge caution over autonomous vehicles and the potential negative impact they could have for people walking and cycling.

I trust these comments are helpful and I am happy to follow up with further comments or evidence if needed.

Transport for South East

1. Introduction

This document is the draft Transport for the South East (TfSE) response to the consultation on the Brighton & Hove City Council's draft 'Our City Transport Plan 2035'. This is a draft officer response that will be presented to our Partnership Board in January 2025 for approval. A further iteration may therefore follow.

TfSE is the sub-national transport body (STB) for the South East of England. Our principal decision-making body, the Partnership Board, brings together representatives from our 16 constituent local transport authorities, district and borough authorities, protected landscapes, business representatives, National Highways, Network Rail and Transport for London.

We have a vision-led Transport Strategy in place to influence government decisions about where, when and how to invest in our region to 2050. Our Strategic Investment Plan (SIP) provides the delivery framework for this strategy, setting out the infrastructure and policy interventions needed across the region over the next three decades. This is in the process of being refreshed.

TfSE welcomes the opportunity to respond to the consultation on the draft 'Our City Transport Plan 2035'. We trust that our response will add value to the development of the City Council's plan and form the basis for continued engagement as we strengthen the 'golden thread' between the local and regional strategies.

2. Approach

The draft 'Our City Transport Plan 2035' is structured around six objectives and a set of guiding principles reflecting active and healthy travel, efficient road networks, the transition to zero-emission vehicles, inclusive access, and well-maintained streets. This approach is closely aligned with the principles underpinning TfSE's Transport Strategy. Both emphasise evidence-based prioritisation, integration of transport with wider policy areas, and the need to balance economic, social and environmental outcomes in decision-making.

There are several common elements in the way the two documents have been developed. Each draws on the 'avoid–shift–improve' framework, promotes a 'Movement and Place' approach that balances the movement of people and goods with the role of streets as public spaces and incorporates aspects of 'Triple Access Planning' which integrates physical mobility, digital connectivity and spatial proximity in access planning. Both documents also support data-led monitoring to inform investment decisions.

3. Vision

The vision in the Brighton & Hove draft LTP5 is strongly aligned with the 2050 Vision in TfSE's Transport Strategy. Both commit to a low-carbon, inclusive and accessible transport system that enhances quality of life and supports sustainable economic growth. The shared emphasis on reducing emissions, improving connectivity, and creating healthier places provides a robust foundation for partnership working. Table 1 below sets out the alignment between the two vision statements.

Table 18: Alignment between the 'Our City Transport Plan 2025' and the 2050 vision in TfSE's Draft Transport Strategy

'Our City Transport Plan 2035' Vision	TfSE Transport Strategy 2050 Vision
A transport system that enables everyone to move around and access what they	Our vision is for the South East to offer the highest quality of life for all and be a

need easily, affordably and safely, while improving health and wellbeing, reducing carbon emissions, and enhancing the city's environment and economy.	global leader in achieving sustainable, net zero carbon growth. We will develop a resilient, reliable and inclusive transport network that enables seamless journeys and empowers residents, businesses and visitors to make sustainable choices.

4. Alignment between Brighton & Hove Objectives and TfSE's Missions

Table 2 presents an assessment of alignment between the objectives of the 'Our City Transport Plan 2035' and the five missions of TfSE's Transport Strategy. The analysis shows strong overall alignment, particularly in relation to decarbonisation, inclusion, and sustainable growth.

Table 2: Alignment between objectives of ‘Our Transport Plan 2025’ and TfSE’s five Missions

Brighton & Hove ‘Our Transport Plan 2035’ objectives	TfSE’s Missions				
	Strategic Connectivity	Resilience	Decarbonisation	Inclusion & Integration	Sustainable Growth
1. Increase the use of public transport and active travel.	X		X	X	X
2. Support the transition to zero-emission vehicles.			X		
3. Ensure safe, inclusive and affordable transport options for all.			X	X	
4. Maintain streets and public spaces to high standards.		X			X
5. Integrate transport with new housing, jobs and regeneration.	X			X	X
6. Harness technology and data to improve travel and reduce emissions.	X		X		X

As shown in Table 2, the objectives of ‘Our Transport Plan 2035’ are broadly consistent with TfSE’s missions. Notably, the emphasis on mode shift and zero-emission vehicles supports TfSE’s Decarbonisation Mission, while the focus on inclusion and accessibility aligns with the Inclusion & Integration Mission. The Council’s approach to technology, data and public realm improvements complements TfSE’s Resilience and Sustainable Growth missions.
TfSE welcomes the clear recognition in ‘Our City Transport Plan 2035’ of the regional role played by Transport for the South East and the inclusion of both the TfSE Transport Strategy and the Strategic Investment Plan (SIP) to demonstrate alignment with regional priorities. The Plan usefully reproduces the TfSE Strategic Investment Plan map, illustrating the alignment between Brighton & Hove’s local priorities and the wider regional network. It also identifies several shared priority schemes, including the Sussex Coast Mass Rapid Transit (MRT) concept, Brighton Main Line resilience and capacity improvements, A27 and A23 corridor enhancements, and the strategic mobility hubs proposed at Falmer, Shoreham, and the A23/A27 junction.

There is scope to strengthen the alignment between the two documents by referring to a small number of additional schemes from the Strategic Investment Plan that are directly relevant to the city’s wider connectivity. These include the A27 East of Lewes to Polegate improvements, which would enhance east–west resilience and improve access between

Brighton and Hove, Eastbourne and the wider coastal area; and the West Coastway Strategic Study, which aims to reduce rail journey times between Brighton, Lewes, Eastbourne and Hastings. Reference could also be made to the proposed additional platform at Brighton Station, which will increase capacity and improve the reliability of services to and from the station and the reinstatement of direct Cross Country services between Brighton, London and the Midlands to reduce journey times for long-distance travelers and support inbound tourism. Finally, reference to TfSE's electric vehicle charging infrastructure and wider decarbonisation work areas, in which the City Council has already been involved, would further demonstrate consistency with regional initiatives to reduce emissions.

Recognising these additional linkages would give a more complete picture of how Brighton and Hove's proposals fit within the wider regional investment framework and would help strengthen the case for future joint funding and delivery.

5. Conclusion

The draft 'Our City Transport Plan 2035' demonstrates a strong alignment with TfSE's Transport Strategy, notably through its recognition of the role of the Transport Strategy and Strategic Investment Plan. TfSE welcomes this clear acknowledgement of the regional context and the City Council's commitment to collaboration on future investment. There is an opportunity to build on this by incorporating explicit references to several regionally significant schemes beyond the city boundary, which would further anchor Brighton & Hove's proposals within the regional investment framework. Doing so would underline the City's contribution to delivering a resilient, inclusive and net-zero transport system for the South East.

University of Brighton

These challenges are accurate and are supported by UOB.
Accessibility is a current barrier to sustainable travel at our Moulsecoomb campus, with the train station being inaccessible to wheelers and those with mobility challenges. We have worked hard and continue to make our campus more accessible and the train station access is a significant barrier.
Challenge 5 is a significant challenge to uptake of active travel and cycling in particular. The adoption of red routes across the city has had a significant, positive impact and have been welcomed by our cycling community.
Cost and accessibility are the biggest challenges to uptake of sustainability transport modes. Our annual travel survey highlights costs and convenience being the two driver factors of mode share choice. A bigger emphasis on addressing public transport costs and physical public transport facilities would strengthen the action to address these challenges

Renew Preston Village Campaign

Renewing Preston Village presents a prime opportunity to develop a Neighbourhood mobility hub and deliver upon 4 of 6 CTP 2035 objectives.
At General Council on Thursday 10th July 2025, Cllr Trevor Muten requested that the Renew Preston Village input into the City Transport Plan.

Renew Preston Village are calling for changes consistent with our campaign material (as available at www.prestonvillage.org) to be included within the 2035 City Transport Plan.

The following has been compiled by the local resident team leading the campaign.

A copy of this document including supporting images will be sent to Cllr Trevor Muten directly on email.

Overview and introduction

Renew Preston Village is a campaign group supported by 1,500 residents, 19 businesses, two churches, one school and a range of community groups including Friends of Preston Park and The Brighton Society.

Preston Village is one of the oldest neighbourhoods in Brighton and Hove - it is the original gateway to the city and it is rich in cultural heritage and local identity. But today, most people experience it as little more than a noisy, six-lane carriageway, wedged between a Shell garage and a Sainsbury's Local on the A23.

Renew Preston Village is campaigning for changes which are deliverable under existing City Council policy so that Preston Village can once again become a thriving, walkable, and welcoming part of our city.

Preston Village has been split in half by the A23 and suffers from limited space for walking, air and noise pollution, flooding and high traffic speeds that makes it unattractive for residents and visitors.

Renew Preston Village is campaigning for;

- Street trees and rain gardens to mitigate flooding and prevent damage to property.

- Improved crossings to create a safer environment for anyone wheeling or walking

- Protected cycle lanes and more space for pedestrians to encourage active travel and create a place for the community to gather.

- Bus stops located to integrate with local facilities.

- Parking & loading bays to support local business.

Collectively, these simple changes can begin to knit Preston Village back together and create a distinctive place that is thriving, safer, protecting from flooding, walkable and people centred.

The following 8 items sets out the case for changes to transport and infrastructure in Preston Village on the A23:

1. Rain gardens to mitigate flooding

Preston Village is in a chalk valley on the route of the seasonal Wellsbourne river which has been culverted under the A23 roadway. Poor drainage has caused 5 surface flooding events between South Road and North Road in Preston Village since 2018 which have seriously impacted business and home owners.

Renew Preston Village is proposing the installation of SUDs (Sustainable Urban Drainage) rain gardens in order to mitigate flooding as part of a wider public realm improvement. Design of the SUDs should be integrated into the wider traffic management scheme.

2. Improved crossings:

East / West across the A23;

Improved crossings with better pedestrian phasing on a 'single stage toucan format' accommodating pedestrians and cyclists would support connectivity and build a positive network effect between east and west sides of the village.

Toucan crossings would connect the Preston Park Railway Station,the pubs and shops on the west side of the A23 at Preston Village with other local facilities and attractions—Preston Manor and the walled gardens, St Peter's Church, the velodrome, cricket ground, and the wider Preston Park.

North / South across North, Middle and Lauriston Road

Renew Preston Village supports use of junction entry features such as continuous pavements or raised continuous 'Copenhagen style' crossings for the lower volume vehicle access to North, Middle and Lauriston Roads which would simultaneously improve the pedestrian safety, experience and public realm.

3. Active Travel

At present Preston Village is not recognised as a transport node in the city but with segregated bike lanes and improved pedestrian infrastructure alongside Beryl Bike hire docks, strategically located bus stops and a wayfinding link to nearby Preston Park rail services it could become a well known hub for mobility.

Renew Preston Village would support a review or study of council owned land to the north east of the A23 & Preston Drove junction which may be suitable for a relocated Beryl Bike Hire station and Southbound bus / National Express coach stop.

4. Reducing Air & Noise Pollution

Trees, rain gardens, other landscape treatments and reduced carriageway space have been proven to reduce average motor vehicle speeds by increasing 'edge friction' - the slowing effect on vehicles caused by nearby elements like trees, buildings, or parked cars along the roadway.

Reduced traffic speeds on the A23 at Preston village would correspond with Improving Air Quality and Reducing Noise Pollution

5. Supporting economic growth

Transport and the associated environmental improvements in Preston Village on the A23 could boost the local economy by incentivising more journeys on bike and on foot - both of which are proven to have an associated increase on spend per head in local shops and businesses.

Repairing links across the A23 could also support the case for new development or recreation investment at the now-vacant vicarage bowls site, support the overall visitor experience at Preston Manor and draw footfall to and from Preston Park, particularly during the summer events season.

Furthermore, reducing or mitigation of local flood risk would be a major benefit to local businesses, providing them with greater access to investment and certainty.

6. Improving public realm

The quality of public realm influences how people behave.Research shows that well-

designed, attractive streets with greenery and coherent layouts lead to more walking, less anti-social behaviour, and stronger community interaction. People are more likely to spend time, feel pride in their surroundings, and engage with others in neighbourhoods that are pleasant and well cared for, with benefits for wellbeing and security.

The transport changes outlined by Renew Preston Village would entail updates in public realm. which could help to protect and leverage the unique architectural heritage of the Preston Park and Preston Village Conservation areas. Well maintained period architecture creates a sense of history and sense of place. When combined with a high standard of public realm, unique features in the village can be enhanced and celebrated to the benefit of the local community and the visitor economy.

7. Community cohesion

Good urban design prioritises walkability, active frontages, local shops, safe public spaces, and promotes environments that support chance encounters, community events, and everyday sociability.

The pedestrian experience in Preston Village today feels very hostile, unwelcoming and inhospitable. The transport changes proposed by Renew Preston Village could have indirect benefits for the community by creating a shared communal space at the physical heart of the community where local residents can meet.

8. Events infrastructure

Between May and October Preston Park is the city's largest designated event venue with Pride, Brighton Marathon, Comedy Garden, the Thai festival and fireworks night attracting tens of thousands of visitors.

Preston Village is a key corridor and central to ingress and egress of visitors using Preston Park railway station. Infrastructure should be fit for purpose and account for the peak volume of pedestrians facilitating a safer, cleaner area, with opportunities for unlocking higher levels of spend locally from local residents and regional visitors.

General Equality Impact Assessment (EIA) – Our City Transport Plan

1. Assessment details

Throughout this form, 'activity' is used to refer to many different types of proposals being assessed.

Read the EIA toolkit for more information.

Name of activity or proposal being assessed:	Replacement of Local Transport Plan 4 (LTP4) with Our City Transport Plan 2035
Directorate:	City Operations
Service:	City Infrastructure
Team:	Transport Policy & Strategy
Is this a new or existing activity?	There is existing transport policy in LTP4 but the process of writing LTP5 will be a new activity.
Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)	Yes. LTP4 and the local Cycling & Walking Infrastructure Plan (LCWIP) EIA.

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

Responsible Lead Officer:	Kieran Tayor, Principal Transport Planner
Accountable Manager:	Laura Wells, Transport Policy Manager
Additional stakeholders collaborating or contributing to this assessment:	Possability People – Get Involved Group (consultation workshop) Brighton & Hove Older Peoples' Council (consultation response)

3. About the activity

Briefly describe the purpose of the activity being assessed:

To produce a new long-term Transport Policy, which will assist the council in securing Government funding and communicate to residents, and other stakeholders what the transport needs of the city are.

Our City Transport Plan 2035 sets out the long-term strategy for the management, maintenance and improvement of the city's transport network, and a short-term implementation plan. It identifies the priorities and projects required to help people move around the city more safely, sustainably and easily.

What are the desired outcomes of the activity?

There are two desired outcomes. Firstly, the drafting and adoption of the city's main transport policy document. Secondly, that the process of drafting LTP5 involves stakeholders and that the end product has been co-produced.

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

All residents, visitors and workers will be affected to some degree, by the transport policy that the city adopts. In terms of those with protected characteristics most impacted by changes to our streets / transport network are:

- Disabled people, because the policy concerns the layout of our streets and public realm.

- Older people (because there is a high incidence of age-related disabilities).
- Young people, who have the greatest vested interests in the policy achieving the required greenhouse gas emission reductions.

Beyond those with protected characteristics defined in law other groups affected will be:

- Those on low incomes (Socio-economic disadvantage), particularly those living in outer areas of the city.

4. Consultation and engagement

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

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

A Direction of Travel document for developing LTP5 was the subject of a public consultation in 2021. This was focused on setting out the challenges the city faces and developing a vision for Our city Transport Plan 2035. The results of the public consultation were reported to the Environment, Transport & Sustainability Committee in March 2022.

This initial document, and period of engagement, formed the basis of the draft version of Our City Transport Plan 2035. We conducted a 12-week public consultation on this draft policy between 18 June and 12 September 2025. The main channel for feedback was an online survey hosted on the council's consultation portal, Your Voice. The draft policy, along with supporting documents, were available to read on-line and paper copies were available in libraries or on request. We received 500 survey responses.

Our engagement activity during the consultation period consisted of:

- A week-long public exhibition at Jubilee Library.
- Seven drop-in sessions held in 6 libraries across the city.
- Five workshops held with secondary school pupils.
- Six workshops/ meetings with stakeholders, including the Transport Partnership, Local Access Forum and a Get Involved Group organised by Possability People.

The purpose of having dedicated sessions in secondary schools was to ensure we heard from young people, who tend to be less well represented in consultation surveys.

A 90-minute workshop with a Get Involved Group, organised by Possibility People, was to ensure that the views of disabled people were also captured in the consultation. Of the 500 consultation responses there were 83 where respondents reported that they had a health issue that limited their day-to-day activities. Responses from these 83 people were analysed to see what if any differences there were from the overall responses. This was to highlight if disabled people had different priorities.

5. Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this activity? Consider all possible intersections. (State Yes, No, Not Applicable as appropriate)

The consultation survey on the draft version of Our City Transport Plan 2035 included questions that asked about gender, sex, age, ethnicity and disability. Equality questions were focused on legally protected characteristics that were felt to be most impacted by transport policy. To keep the survey concise, we did not ask additional questions about other categories, whether people were in the armed forces or had caring responsibilities for example.

We have also drawn on national, regional and local data that gives us an insight into the people's experience of transport. This is included in the evidence base for Our city Transport Plan 2035. This data relates to protected characteristics and socio-economic status. Data specifically on how the transport system in Brighton & Hove serves other groups, such as the homeless or armed forces personnel, is not available.

Age	YES
Disability and inclusive adjustments, coverage under equality act and not	YES
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	YES
Religion, Belief, Spirituality, Faith, or Atheism	NO
Gender Identity and Sex (including non-binary and Intersex people)	YES
Gender Reassignment	YES
Sexual Orientation	NO
Marriage and Civil Partnership	NO
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	NO
Armed Forces Personnel, their families, and Veterans	NO
Expatriates, Migrants, Asylum Seekers, and Refugees	NO
Carers	NO
Looked after children, Care Leavers, Care and fostering experienced people	NO
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	NO
Socio-economic Disadvantage	YES
Homelessness and associated risk and vulnerability	NO
Human Rights	NO
Another relevant group (please specify here and add additional rows as needed)	N/A

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

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

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

The answers in the table above relate to survey data recorded from the Your Voice consultation on the draft version of Our City Transport Plan 2035.

In addition to survey responses our analysis, for the evidence base of Our City Transport Plan 2035, included area-based demographic and deprivation data to identify inequalities in access to transport and inform where improvements are needed. The specific issue of access to education, for children living in the east of the city who are in a single school catchment, was raised during the consultation. School entry requirements have been amended to provide greater choice, and bus services re-organised to facilitate better access. However, there were concerns raised that the affordability of transport may impact people's uptake of the changed school entry criteria. This can be monitored through postcode plotting of school intake.

Consultation & engagement opportunities are always promoted to a wide range of stakeholders in the city, through different means, in order to obtain a wide range of views, particularly in terms of qualitative feedback. Good relationships have been established with many groups in the city to elicit these views which are vital to feed into policies and plans.

It should be noted that the individual projects referenced in Our City Transport Plan will be subject to their own equality impact analysis. This offers further opportunities for engagement and monitoring of impacts. The 2025 refreshed Bus Service Improvement Plan involved focus groups with disabled people for example. Where an impact on a specific group from a particular project is identified (such as Armed Forces personnel, refugees, or people experiencing homelessness), their needs may be more directly addressed through delivery of these projects.

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

The plan contains key performance indicators and the individual projects within this plan will have their own arrangements for monitoring and reviewing their impact.

6. Impacts

Advisory Note:

- **Impact:**
  - Assessing disproportionate impact means understanding potential negative impact (that may cause direct or indirect discrimination), and then assessing the relevance (that is: the potential effect of your activity on people with protected characteristics) and proportionality (that is: how strong the effect is).
  - These impacts should be identified in the EIA and then re-visited regularly as you review the EIA every 12 to 18 months as applicable to the duration of your activity.
- **SMART Actions mean**: Actions that are (SMART = Specific, Measurable, Achievable, Realistic, T = Time-bound)
- **Cumulative Assessment:** If there is impact on all groups equally, complete **only** the cumulative assessment section.
- **Data analysis and Insights:**
  - In each protected characteristic or group, in answer to the question 'If "YES", what are the positive and negative disproportionate impacts?', describe what you have learnt from your data analysis about disproportionate impacts, stating relevant insights and data sources.
  - Find and use contextual and wide ranges of data analysis (including community feedback) to describe what the disproportionate positive and negative impacts are on different, and

intersecting populations impacted by your activity, especially considering for Health inequalities, review guidance and inter-related impacts, and the impact of various identities.
    - For example: If you are doing road works or closures in a particular street or ward – look at a variety of data and do so from various protected characteristic lenses. Understand and analyse what that means for your project and its impact on different types of people, residents, family types and so on. State your understanding of impact in both effect of impact and strength of that effect on those impacted.
- **Data Sources:**
    - **Consider a wide range (including but not limited to):**
        - Census and local intelligence data
        - Service specific data
        - Community consultations
        - Insights from customer feedback including complaints and survey results
        - Lived experiences and qualitative data
        - Joint Strategic Needs Assessment (JSNA) data
        - Health Inequalities data
        - Good practice research
        - National data and reports relevant to the service
        - Workforce, leaver, and recruitment data, surveys, insights
        - Feedback from internal 'staff as residents' consultations
        - Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
        - Insights, gaps, and data analyses on 'who' the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.
- Learn more about the Equality Act 2010 and about our Public Sector Equality Duty.

6.1 Age

Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: those under 16, young adults, with other intersections.	YES /~~NO~~

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

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

Transport Policy will have a disproportionate impact on older and younger people. The outsize impact on older people stems from the high incidence of age-related disability (see section 6.2). Those over 66 are also in receipt of existing transport benefits, meaning that transport policy decisions are more likely to affect them. The council spends millions each year meeting the cost of older people's bus passes.

Older people have raised the following concerns:

- accessibility and isolation issues; many cannot rely on active travel
- long distances between bus stops, lack of seafront bus service and perceived high parking charges.
- reliance on online systems (ticketing, parking permits, bike hire) disadvantages them.
- supported healthier lifestyles and clean air but warned about unsafe pavements, shared space and the cost barriers of EVs.

The outsize impact on the young stems from the fact that the surface transport sector contributes 22% of the UK's total emissions and that decarbonising this sector will be essential to mitigating the worst impacts of climate

change. Through the Bus Service Improvement Plan under 19's also receive existing benefits in the form of subsidised fares. Decisions made regarding transport policy will also have an important impact on how accessible schools in the city are (The city has recently changed the schools admissions criteria so that up to 5% of places in each of the city's community secondary schools will now be open to pupils who live in single-school catchment areas).

Despite the considerable sums spent on fare subsidies the affordability of transport was an issue that was raised by younger people, and the general population.

6.2 Disability:

Does your analysis indicate a disproportionate impact relating to Disability, considering our anticipatory duty?	YES /~~NO~~

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

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

Disability has a large impact on travel habits. Disabled people travel less than non-disabled people. In 2020 they made 28% fewer trips, and significantly more disabled people live in households without access to a car or van. National research, commissioned by Government, provides relevant insights into the challenges disabled people face[1]. Our transport policy and projects will have a disproportionate impact on this group, both positive and negative. Because of this we engaged with a Get Involved Group, organised by Possability People. The feedback we received supported findings at the national level. The needs of individual disabled people varies according to their disability. Measures we can take to improve access for one group may disadvantage others. For example level surfaces between the footway and road surface are beneficial for those in wheelchairs but can make navigating difficult for those with sight impairments who use kerbs as a guide to locate themselves.

General feedback:

- The provision of disabled parking in some key locations was not felt to be adequate. This includes the old town, where widening of pavements, has removed spaces to park on double yellow lines and where red routes have been introduced.
- Shared spaces, between cyclists and pedestrians, created a feeling of insecurity. It was felt they rely too much on social understanding; some users (cyclists, e-scooter riders) don't yield to pedestrians. This was especially the case for blind or partially sighted people.
- It was felt that there were inconsistent standards across council departments when it comes to accessibility and that there was a lack of learning from previous projects where accessible planning was not fully considered.On public transport the long gaps between bus stops on Western Road were highlighted and that there are issues with real-time tracking for certain bus services and this makes journey planning difficult.
- Consultation processes are often inaccessible, lack of notice and insufficient work done to survey opinions from people with learning disabilities — Your Voice surveys are not adequate on their own and more time and better formats are needed.
- Street clutter (like cycle parking or café/restaurants furniture) create barriers for those who rely on a kerb or building lines to navigate. Flat surfaces useful for mobility needs are difficult for blind or partially sighted people owing to use of raised curbs to navigate.

[1] UK Disability Statistics: Prevalence and life experiences
Accessibility & Inclusivity of bus and coach
Disabled people's experience of rail
People with non-visible impairments' attitudes and experiences of transport qualitative research
Evaluation of the Inclusive Transport Strategy

Feedback related to wheelchair users:

- Newer buses may not accommodate all wheelchair sizes, and drivers often don't wait at the raised parts of stops.
- Uneven surfaces, steep cambers (e.g. Gardner Street), and potholes on pavements are dangerous for wheelchair users. It also requires expensive maintenance of chair outside of the usual cycle regularly
- Wheelchair users end up in the road owing to pavement congestion on some streets such and Ship Street.
- The incline at the Eye Hospital makes access difficult for the mobility impaired, though benefitting the visually impaired.
- Wheelchair users reported taxi drivers avoiding pickups due to their perception it is difficult to stop or turnaround on red routes.

Feedback related to learning difficulties:

- Dotted crossings unsafe for people with learning disabilities.

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

In response to the comments raised about consistent standards across projects the revised Our City Transport Plan includes a commitment to publish an updated Streetscape Design Guide. This will set out accessibility standards for schemes. It will be developed in close consultation with disabled people. Schemes in Our City Transport Plan will be delivered in accordance with this guidance. There are schemes within Our City Transport Plan that are focused on delivering improved public realm and pavements conditions.

Red routes schemes along London Road and Lewes Road have been successful in reducing pavement parking and improving traffic flow, particularly buses. As a results, further red route schemes are being proposed. It is our existing policy that licensed Hackney Carriages and private hire vehicles can stop to drop off disabled people. This policy clearly needs to be better communicated and this is an action taken from the consultation.

6.3 Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers):

Does your analysis indicate a disproportionate impact relating to ethnicity?	~~YES /~~ NO

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

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

No disproportionate negative impacts identified for this group at this time.

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

Does your analysis indicate a disproportionate impact relating to Religion, Belief, Spirituality, Faith, or Atheism?	~~YES /~~ NO

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

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

No disproportionate negative impacts identified for this group at this time.

6.5 Gender Identity and Sex:

Does your analysis indicate a disproportionate impact relating to Gender Identity and Sex (including non-binary and intersex people)?	~~YES /~~ NO

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

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

No disproportionate negative impacts identified for this group at this time.

6.6 Gender Reassignment:

Does your analysis indicate a disproportionate impact relating to Gender Reassignment?	~~YES /~~ NO

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

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

No disproportionate negative impacts identified for this group at this time.

6.7 Sexual Orientation:

Does your analysis indicate a disproportionate impact relating to Sexual Orientation?	~~YES /~~ NO

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

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

No disproportionate negative impacts identified for this group at this time.

6.8 Marriage and Civil Partnership:

Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?	~~YES /~~ NO

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

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

No disproportionate negative impacts identified for this group at this time.

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

Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)?	~~YES /~~ NO

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

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

No disproportionate negative impacts identified for this group at this time.

6.10 Armed Forces Personnel, their families, and Veterans:

Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?	~~YES /~~ NO

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

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

No disproportionate negative impacts identified for this group at this time.

6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

Does your analysis indicate a disproportionate impact relating to Expatriates, Migrants, Asylum seekers, Refugees, those New to the UK, and UK visa or assigned legal status? (Especially considering for age, ethnicity, language, and various intersections)	~~YES /~~ NO

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

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

No disproportionate negative impacts identified for this group at this time.

6.12 Carers:

Does your analysis indicate a disproportionate impact relating to Carers (Especially considering for age, ethnicity, language, and various intersections).	**YES / ~~NO~~**

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

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

As disabled people often rely on carers to drive them to essential services, carers may face similar difficulties in accessing these services along red routes, as mentioned in section 6.2.

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

Does your analysis indicate a disproportionate impact relating to Looked after children, Care Leavers, Care and fostering experienced children and adults (Especially considering for age, ethnicity, language, and various intersections). **Also consider our Corporate Parenting Responsibility in connection to your activity.**	~~**YES**~~ **/ NO**

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

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

No disproportionate negative impacts identified for this group at this time.

6.14 Homelessness:

Does your analysis indicate a disproportionate impact relating to people experiencing homelessness, and associated risk and vulnerability? (Especially considering for age, veteran, ethnicity, language, and various intersections)	~~YES /~~ NO

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

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

No disproportionate negative impacts identified for this group at this time.

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

Does your analysis indicate a disproportionate impact relating to Domestic Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)?	~~YES /~~ NO

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

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

No disproportionate negative impacts identified for this group at this time.

6.16 Socio-economic Disadvantage:

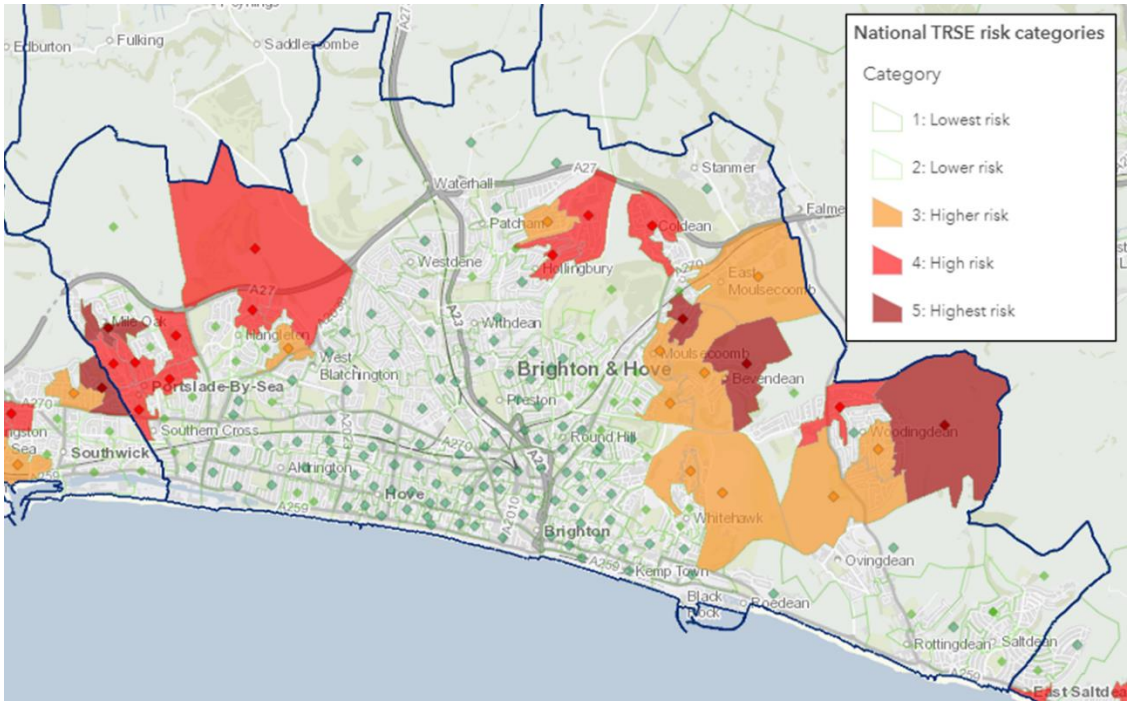
Does your analysis indicate a disproportionate impact relating to Socio-economic Disadvantage? (Especially considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections)	YES ~~/ NO~~

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

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

The evidence base includes an assessment of the Transport Risk of Social Exclusion. This identifies that lower income groups on the edge of the city (Woodingdean, Portslade, Bevendean, Coldean and Hollingbury) are at high risk of exclusion, because of the affordability of transport and their distance from key basic services – education, employments etc.

People living on the edges of the city requested better connectivity and more frequent bus services. The BSIP Accessibility Study has identified key areas for improvement and the BSIP Refresh includes proposals for 2025 and beyond to enhance the bus network and services, helping to reduce the risk of transport-related social exclusion in the city.



6.17 Human Rights:

Will your activity have a disproportionate impact relating to Human Rights?	NO

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

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

No disproportionate negative impacts identified for this group at this time.

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

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

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

People who are members of multiple Minoritised groups may experience compounded impacts similar to those already identified for older people, young people, and disabled people. For example, those with mobility issues may face greater challenges accessing parking or public transport, while people with literacy or language barriers may find it more difficult to use online or app-based transport services. These overlapping factors can make it harder for them to travel independently or access essential services, even though the underlying barriers are shared with other groups.

An evaluation of the national Inclusive Transport Strategy spoke with participants who chose to travel by modes that were less accessible to them, because they could not afford those that were. It also highlighted that younger disabled people and those with less outwardly visible health conditions could internalise societal preconceptions about what disability looks like, and feel undeserving of extra help or adjustments.

7. Action planning

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

- Summarise relevant SMART actions from your data insights and disproportionate impacts below for this assessment, listing appropriate activities per action as bullets. (This will help your Business Manager or Fair and Inclusive Action Plan (FIAP) Service representative to add these to the Directorate FIAP, discuss success measures and timelines with you, and monitor this EIA's progress as part of quarterly and regular internal and external auditing and monitoring)

- Feedback to the consultation showed greatest support for the objective of 'maintaining roads and managing the network efficiently' the funding to deliver this objective has been increased. Within Our City Transport Plan 2035 there is indicative funding for the coming three financial years. Funding levels will be confirmed in the transport Capital Programme, which will be published

before March 2026. This will address concerns raised about the quality of pavements and streets that disabled people raised.

- To address concerns raised by disabled people about applying consistent standards on our schemes we have committed to publish an updated Streetscape design guide. We aim to have this done by the end of 2026. We will develop this in close consultation with disabled people. The document will then be used on all schemes undertaken by the council. It will cover:
  - How the council will ensure adequate footway widths.
  - Our approach to installing street trees, greening and sustainable urban drainage.
  - Auditing the existing provision of disabled bays and yellow line parking in high demand areas.
  - The design and provision of disabled parking in transport schemes.

- To address concerns about disabled access to services and shops on red routes we will ensure that the consultation report on the Western Road Red Route sets out in greater detail how the existing policy that allows Blue Badge holders to be picked up or dropped off, so long as the vehicle is not parked, is applied. The consultation report will be published by summer 2026.
- Issues that have been raised regarding bus services, such as access to schools and provision in more outlying areas, will be monitored through the Bus Service Improvement Plan. School route bus loading can be assessed and updates provided annually alongside the key performance indicators.

Which action plans will the identified actions be transferred to?

- For example: Team or Service Plan, Local Implementation Plan, a project plan related to this EIA, FIAP (Fair and Inclusive Action Plan) – mandatory noting of the EIA on the Directorate EIA Tracker to enable monitoring of all equalities related actions identified in this EIA. This is done as part of FIAP performance reporting and auditing. Speak to your Directorate's Business Improvement Manager (if one exists for your Directorate) or to the Head of Service/ lead who enters actions and performance updates on FIAP and seek support from your Directorate's EDI Business Partner.

The above actions will be incorporated into the service plan for Transport Projects and Engineering once it is next updated. It is anticipated that this will be done in 2026 but no firm date is set for when it will be completed. In the interim the above actions will be incorporated into the Transport Policy & Strategy (part of Transport Projects & Engineering) service plan.

8. Outcome of your assessment

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

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

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

N/A

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

The recommendation in the draft cabinet report is for the revised Our City Transport Plan 2035 to be adopted. The revised Our City Transport Plan 2035, attached to the report, contains the commitment to develop a Streetscape design guide and an indicative three year spending plan.

9. Publication

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

N/A

10. Directorate and Service Approval

Signatory:	**Name and Job Title:**	**Date:** DD-MMM-YY
Responsible Lead Officer:	Kieran Taylor, Principal Transport Planner	12/11/2025
Accountable Manager:	Laura Wells, Transport Policy & Strategy Manager	25/11/25

Notes, relevant information, and requests (if any) from Responsible Lead Officer and Accountable Manager submitting this assessment:

EDI Review, Actions, and Approval:

Equality Impact Assessment sign-off

EIA Reference number assigned: DIRNAME##-DD-MMM-YY-EIA-Name
For example, HNC##-25-Dec-23-EIA-Home-Energy-Saving-Landlord-Scheme

EDI Business Partner to cross-check against aims of the equality duty, public sector duty and our civic responsibilities the activity considers and refer to relevant internal checklists and guidance prior to recommending sign-off.

Once the EDI Business Partner has considered the equalities impact to provide first level approval for by those submitting the EIA, they will get the EIA signed off and sent to the requester copying the Head of Service, Business Improvement Manager, Equalities inbox, any other service colleagues as appropriate to enable EIA tracking, accountability, and saving for publishing.

Signatory:	Name:	Date: DD-MMM-YY
EDI Business Partner:	Chris Brown	26-Nov-2025
EDI Manager:		
Head of Communities, Equality, and Third Sector (CETS) Service: *(For Budget EIAs/ in absence of EDI Manager/ as final approver)*		

Notes and recommendations from EDI Business Partner reviewing this assessment:

Notes and recommendations (if any) from EDI Manager reviewing this assessment:

Notes and recommendations (if any) from Head of CETS Service reviewing this assessment:

LOCAL TRANSPORT PLAN 5 – STRATEGIC ENVIRONMENTAL ASSESSMENT

Brighton and Hove City Council

2025

Brighton & Hove

PROJECT CENTRE

Document Control

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Job Number	Issue	Description	Originator	Checked	Authorised
10779	0.9	SEA	DB	MV	

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1 Non-Technical Summary

1.1 Introduction

1.1.1 This Non-Technical Summary provides an overview of the Strategic Environmental Assessment (SEA) for the draft transport policy 'Our City Transport Plan 2035'. This is the title of the fifth Local Transport Plan (hereafter referred to in this document as 'LTP5') produced by Brighton and Hove City Council (BHCC). The following sections of this Non-Technical Summary are comprised of the following:

- Description of the content, purpose and scope of the draft LTP5;
- Description of what an SEA is, its purpose and the SEA process and how it has been applied to the draft LTP5, including the SEA objectives and guide questions used in the assessment;
- Consideration of alternatives to the delivery of the LTP5;
- A summary presentation of the findings of the SEA of the draft LTP5; and
- Sets out the next steps in the SEA process including monitoring.

1.1.2 Under European legislation the Strategic Environmental Assessment (SEA) Directive (2001/42/EC) requires that responsible authorities ensure that due regard for environmental and sustainability impacts are comprehensively integrated when drawing up any plans.

1.1.3 The SEA Directive introduces the following requirements for an SEA:

- The findings of the SEA are published in an environmental report, which sets out the significant effects of the draft plan, in this case Brighton and Hove's fifth Local Transport Plan.
- Consultation is undertaken on the plan and the environmental report.
- The results of consultation are considered in decision-making relating to the adoption of the plan.
- Information on how the results of the SEA have been considered is made available to the public.

1.1.4 This environmental report builds on the SEA Scoping Report produced by BHCC.

1.2 What is the Brighton and Hove Local Transport Plan?

1.2.1 A local transport plan is a strategic document prepared by local transport authorities in the UK to outline their vision, objectives and proposals for transport related projects, schemes and improvements within their area.

1.2.2 The BHCC LTP5 is the council's over-arching transport policy for the coming decade, which sets out both a long-term strategy and a short-term programme of work to deliver specific schemes. The plan sets out an ambitious vision for getting around a cleaner, fairer and growing city. To achieve this, the LTP5 sets out five key challenges that will be addressed, these are as follows:

- Enabling more people to live safer, healthier and more active lives
- Improving the flow of traffic on our roads
- Supporting the transition to low and zero emission vehicles
- Creating a transport network that is more inclusive
- Maintaining our roads and managing them as efficiently as possible

1.3 What is a Strategic Environmental Assessment?

1.3.1 A strategic environmental assessment is a process used to evaluate the potential environmental impacts of plans and/or policies before implementation. It is designed to ensure that environmental considerations are integrated into high-level decision making.

1.3.2 SEAs are required under the SEA Directive (2001/42/EC) in the UK, the process includes identifying, describing, and assessing the likely significant environmental effects of proposed actions, consulting with relevant authorities and the public, and incorporating findings into the final plan or programme.

1.3.3 The stages of an SEA are outlined below:

- Stage A – Setting the context and objectives, establishing the baseline and deciding on the scope
- Stage B – Developing and refining alternatives and assessing effects
- Stage C – Preparing the environmental report
- Stage D – Consulting on the draft plan and the environmental report
- Stage E – Monitoring the significant effects of implementing the plan or programme on the environment.

1.3.4 It is important to note that this environmental report will cover stages A, B and C of the above stages.

1.4 Coverage of the Environmental Report

1.4.1 The following items have been examined during the assessment and are set out in the environmental report:

- Scope of the SEA and SEA methodology
- Background information on Brighton and Hove's LTP5 and its main objectives
- The environmental baseline
- The SEA framework/SEA objectives
- The compatibility of LTP5 objectives with SEA objectives
- Development of alternative options for the LTP5
- Assessment of the environmental effect of the LTP5 and its alternatives
- Identification and analysis of environmental problems
- Monitoring measures

1.5 Environmental context and baseline

1.5.1 An LTP is influenced by other relevant plans, programmes and strategies at international, national, regional and local levels. At international level, international agreements and EU directives establish requirements and guidance on issues such as sustainable development, climate change, biodiversity, habitats, water and air quality. There are also specific national plans, guidance and strategies on aspects such as transport, planning, climate change, air quality, biodiversity, the historic environment and sustainable development. At a local level, the *Brighton and Hove City Plan 2023 – 2027* and the *Accessible City Strategy* are key policy documents which influence the direction of the LTP5.

1.5.2 Key environmental objectives of these various plans and programmes have been considered in the assessment of the Brighton and Hove LTP5.

1.6 SEA framework

1.6.1 A SEA framework of objectives has been devised from the review of plans and programmes, analysis of baseline data and consideration of environmental issues within the Borough. This framework, which includes a series of environmental objectives, is used to assess the environmental effects of the LTP5.

1.6.2 The SEA Directive does not specifically require the use of objectives or indicators in the SEA, but objectives can usefully demonstrate how environmental effects can be described, analysed and compared. The SEA objectives include:

- Protect and enhance the environment and important landscapes in the local area;
- Create a city where people thrive;
- Protect and enhance soil quality;
- Protect and enhance water quality;
- Reduce transport related air and noise pollution;
- Reduce transport related emissions;
- Protect and enhance heritage assets and their settings; and
- Contribute towards an inclusive, accessible and fair city.

1.7 Consideration of alternatives for the LTP5

1.7.1 A key element of the SEA process is the consideration of alternative ways of delivering the plan so that an assessment can be made of the best environmental options to take forward. The aim of the exercise is to assess the variety of options available for implementing the draft LTP5 objectives. It also assisted decision making on the preferred options to prioritise, taking account of the potential environmental effects of the whole LTP5.

1.7.2 The alternatives set out in this report are as follows:

- Option 1 – Do nothing
- Option 2 – Mix of modal investment
- Option 3 – Stable investment levels
- Option 4 – Increasing investment in public, shared and active travel
- Option 5 – Increased investment focused on one travel mode

1.8 Summary of findings of the SEA for the LTP5

1.8.1 The assessments undertaken in the SEA find that the likely effect of the LTP5 on the proposed SEA topics are both minor positive and significant positive, with the exception of the effects on land, soil and waste and water resources and quality, which are unknown. The effects on historic environment are likely to be both positive and negative.

1.8.2 Of the alternative options set out in the document, it was found that 'Option 4 – increasing investment in public, shared and active travel' scored the highest against the SEA objectives, with mostly positive and significant positive scores. 'Option 1 – do nothing' scored the lowest of all the options, with mostly significant negative and minor negative scores.

1.9 Mitigation and monitoring

1.9.1 Monitoring helps to keep track of the actual environmental effects of implementing the Brighton and Hove LTP5. The LTP5 includes a programme to monitor delivery of the initiatives, including key performance indicators (KPIs) and baselines against LTP5 objectives. SEA monitoring is also proposed within the environmental report. KPIs have been set out, with targets set for each SEA objective. These measures are subject to on-going consultation and will be defined in more detail in the run up to publication of the SEA statement following adoption of the final LTP5.

2 Introduction

2.1 Background

2.1.1 The geographical scope of this SEA is that of Brighton and Hove City Council's administrative area.

2.1.2 Brighton and Hove City Council (BHCC), like all local authorities in the UK, is required under the Transport Act 2008 to produce a local transport plan. The plans should include strategic objectives, a policy framework, an implementation plan and measures for monitoring and evaluation.

2.2 The SEA and the regulations

2.2.1 Under the Strategic Environmental Assessment (SEA) Directive 2001/42/EC, Brighton and Hove City Council is required to undertake an assessment of the city's fifth Local Transport Plan (LTP5) to determine the likely significant environmental effects of the proposed objectives and initiatives set out therein.

What is an SEA?

2.2.2 In the SEA Directive, an environmental assessment is defined as 'the preparation of an environmental report, the carrying out of consultations, the taking into account of the environmental report and the results of the consultations in decision-making and the provision of information on the decision.'

2.2.3 The objective of the SEA directive is:

'To provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development'.

2.2.4 Thus, a SEA ensures that environmental and sustainability implications of the LTP5 are adequately identified, addressed, mitigated, communicated to decision makers and monitored. The process also provides adequate opportunities to engage stakeholders, thus reducing the potential harm done to the environment.

2.2.5 Article B of the Directive 2001/42/EC requires the Environmental Report and the results of consultation to be considered during the decision-making process. To be effective, an SEA should be undertaken as an iterative process and should be fully integrated into the plan-making process.

2.3 Scope of the SEA

2.3.1 The SEA Directive provides an indicative list of issues/topics that should be considered when looking at the environmental impacts of the LTP5. These include:

- Biodiversity, fauna and flora;
- Population and human health;
- Air;
- Soil;
- Water;
- Climatic factors;
- Material assets;
- Cultural heritage; and
- Landscape.

2.3.2 The SEA Directive requires that efforts are focussed on significant environmental impacts of the LTP5. The Environmental Report is not intended to cover all impacts or environmental issues. The Environmental Report is not meant as a replacement for any Council reports that publish data, targets or monitoring information. In addition, the Environmental Report is not designed to carry out an Environmental Impact Assessment of individual proposals, policies or programmes. It is a strategic assessment of potential significant impacts of the LTP5.

2.3.3 The SEA is restricted to the geographical area of the LTP5, in this case, the Brighton and Hove City Council area. The SEA will also cover the same period as the LTP5, which is from 2025 until 2035.

2.4 Draft Local Transport Plan 5

2.4.1 The BHCC LTP5 is the council's over-arching transport policy for the coming decade, which sets out both a long-term strategy and a short-term programme of work to deliver specific schemes. The plan sets out an ambitious vision for getting around a cleaner, fairer and growing city. To achieve this, the LTP5 sets out five key challenges that will be addressed, these are as follows:

- Enabling more people to live safer, healthier and more active lives;
- Improving the flow of traffic on our roads;
- Supporting the transition to low and zero emission vehicles;
- Creating a transport network that is more inclusive; and
- Maintaining our roads and managing them as efficiently as possible

2.4.2 To address the above challenges, objectives have been set within the LTP5, each aiming to address one or more of the challenges. The LTP5 objectives can be found below.

- Increase public transport use;
- Enable the uptake and use of low and zero emission vehicles;

- Deliver a safe, inclusive and integrated transport system;
- Create well-maintained streets and pavements;
- Provide active travel choices for all and excellent public spaces; and
- Promote and use technology to reduce and manage travel

2.4.3 The capital programme of work for 2025/26 can be found in Table 2.1 overleaf.

Table 2.1 - BHCC capital programme of work for 2025/26

Primary Objective	Project / Scheme	Description	Funding allocations 2025/26 (£000s)
Increase public transport use	BSIP funded bus lanes, bus priority and accessibility, subsidies for fares and routes.	A259 Marine Parade & A23 Patcham bus lanes, Queens Road and Western Road Red Routes, provision of socially necessary bus routes and targeted fare subsidies, mobility hub feasibility, accessible bus stops and passenger information.	£9,280
Enable the uptake and use of low and zero emission vehicles	EV charge points	On street EV charge-points for residents, taxis and businesses	£903
Deliver a safe, inclusive and integrated transport system	Improving accessibility	Dropped kerbs accessibility programme and delivering the Public Right of Way improvement Plan	£200
	Improving accessible cycling	Bike hire facilities and cycle parking developments	£125
	Improving safety	Safer Better Streets, School Streets, School Travel Plan Measures and Collision Reduction	£415
Create well-maintained streets and pavements	Carriageway maintenance	Renewals and an ongoing Seek and Fix programme	£3,950
	Pavement maintenance	Renewals and an ongoing Seek and Fix programme	£628
	Drainage, structures and lighting maintenance	Covering gullies, pipes, retaining walls, historic lamp-columns, in-fill works on major roads and maintaining accurate asset data	£555
Provide active travel choices for all and excellent public spaces	Supporting active and inclusive travel	Delivering our LCWIP – including the A23 & A259 active travel schemes	£1,200
	Delivering major schemes	Valley Gardens Phase 3 (match funding)	£728
Deliver a safe, inclusive and integrated transport system **Create well-maintained streets and pavements** **Provide active travel choices for all and excellent public spaces**	Delivering major schemes	Project Management Support and delivery of Section 106 (developer contributions secured through planning) sustainable transport schemes.	£415
Promote and use technology to reduce and manage travel	Traffic signals	Refurbishment of signalised crossings/junctions	£150
		Grand Totals	£18,549

3 SEA Methodology

3.1 Introduction

3.1.1 This section outlines the methodology employed in producing the SEA. The section will include the stages of the SEA process, including the approach taken at each stage. The section will also include the relationship between the LTP5 and SEA, showing links between the work stages of each document.

3.2 SEA process

3.2.1 The SEA process is completed during the preparation of plans and strategies, in this case a local transport plan. The role is to promote sustainability through the assessment of the extent to which objectives and plans will contribute to achieve social and environmental objectives.

3.2.2 The SEA process can be split into five stages. This document will address stages A-C, which can be found in Table 3.1 overleaf.

Table 3.1 - Stages of the SEA process

Stage	Description	Approach
Stage A	Identify other relevant plans, programmes and environmental protection objectives	At inception liaise with BHCC to collect all necessary documents that relate to LTP5.
	Collecting baseline information	Undertake holistic document review of available data, including existing local, regional and national policy.
	Identifying environmental problems	Appraise the LTP5 objectives, delivery plans and targets against a range of themes to identify their impact from significant positive effect through to significant negative effect, including uncertainties, minor positive and negative effect and neutral effect.
	Develop SEA objectives	Working with BHCC develop SEA objectives based around the LTP5 objectives
	Consulting on the scope of SEA	Given the timescales there is no allowance for consultation within our scope
Stage B	Testing the plan or programme objectives against the SEA objectives	Prepare a matrix to identify synergies across the SEA and LTP5 objectives. From the objective setting in Stage A and BHCC's work to date on the LTP5.
	Developing strategic alternatives	These will be at a strategic level in keeping with the status of the SEA. We envisage this will include high level themes in line with SEA Regulations. • Do nothing • Mix of modal investment • Stable investment levels • Increasing investment in public, shared and active travel • Increased investment focused on one travel mode
	Predicting the effects of the plan or programme, including alternatives	The impacts will be assessed and presented in a table to clearly show the type and level of impact.
	Consider ways to mitigate adverse effects	For the significant negative impacts, a series of potential mitigation measures will be proposed and discussed with the BHCC team.
	Proposing measures to monitor the environmental effects of the plan or programme implementation	Develop a mechanism for monitoring the performance of the LTP5 over time. We will consider and cross reference existing programmes of work already undertaken by BHCC and regionally so as to minimise extra burden on the council
Stage C	Preparing the Environmental Report	Prepare a report that can be used for consultation in the next stages.

3.3 SEA and LTP5 relationship

3.3.1 The Environmental Assessment of Plans and Programmes Regulations 2004 states that the authority preparing a plan for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use shall carry out or secure the carrying out of and environmental assessment.[1]

3.3.2 The environmental report explains the likely significant environmental impacts of the LTP5 objectives, strategy, the alternatives considered, and the mitigation measures proposed. It demonstrates compliance with the SEA regulations and will accompany the draft LTP5.

3.3.3 Table 3.2 below indicates the main work component stages for the preparation of the Brighton and Hove City LTP5, and the link with the SEA stages.

Table 3.2 - LTP5 and SEA process stages and links

LTP5 Stage	SEA Stage
Determining the scope of LTP5; clarifying goals; specifying the problems or challenges	**A:** • Identify relevant plans, programmes and environmental objectives. • Collecting baseline information • Identifying environmental problems • Develop SEA objectives • Consulting on the scope of SEA
Generating options to resolve these challenges; appraising the options and predicting their effects. **Selecting preferred options for LTP5 and deciding priorities.**	**B:** • Testing the LTP5 objectives against the SEA objectives • Developing strategic alternatives • Predicting the effects of the LTP5, including alternatives • Consider ways to mitigate adverse effects • Proposing monitoring measures
Production of the draft LTP5	**C:** • Preparing the environmental report

[1] The Environmental Assessment of Plans and Programmes Regulations 2004

3.4 SEA Key and Guide

3.4.1 Table 3.3 below sets out the SEA key and guide for the assessment of significance. For each effect that is identified, a score will be given using the framework set out below. This will be done using expert judgement, and by reviewing the evidence available.

Table 3.3 -SEA key and guide for the assessment of significance

Symbol	Effect Significance	Description
++	Significant positive effect	The proposed measure/plan contributes significantly to the achievement of the proposed objectives
+	Minor positive effect	The proposed measure/plan contributes to the achievement of the proposed objectives
-	Minor negative effect	The proposed measure/plan detracts from the achievement of the proposed objectives
--	Significant negative effect	The proposed measure/plan detracts significantly from the achievement of the proposed objectives
+/-	Minor positive and negative effect	The proposed measure/plan has the potential for both a minor positive and negative effect
?	Uncertain effect	The proposed measure/plan has an uncertain relationship to the proposed objectives and/or insufficient information is available to enable an appraisal
0	Neutral effect	The proposed measure/plan does not have any effect on the achievement of the proposed objectives

4 Review of Relevant Policies

4.1 National, regional and local policies

4.1.1 Both the LTP5 and the SEA should be set in the context of national, regional and local policies, to ensure compliance with targets and objectives related to planning, transport, health and sustainability.

4.1.2 Figure 4.1 below sets out the policies and guidance document that were reviewed and considered as part of the SEA.

4.1.3 A more in-depth review of relevant policies can be found in Appendix A of the associated scoping report.



Figure 4.1 - Policy and guidance reviewed and considered for the SEA

5 Environmental Baseline

5.1 Introduction

5.1.1 Environmental baseline information has been gathered as part of an SEA Scoping Report. Within the report, legislation, policy, datasets and trends have been reviewed, baseline data has been compiled, HRA sites that may be affected have been identified, an SEA assessment framework was set out and stakeholders have been identified.

5.1.2 This section of the SEA report will provide a brief overview of the key information from the scoping report, namely, the SEA topics and the assessment framework.

5.2 SEA Topics

5.2.1 It should be noted that the SEA regulations consider only the environmental effects of a plan, this SEA will consider the wider impacts associated with the LTP5. Although the requirements of SEA regulations are specific, a joint appraisal will be undertaken which includes both sets of requirements/topics.

5.2.2 The baseline evidence that has been compiled as part of the scoping report has been split into eight sections, which aim to cover various sustainability issues. However, there are many issues which are similar and crossover, Table 5.1 below shows the relationship between the topic chapters and how the requirements of the SEA Regulations have been met.

Table 5.1 - The relationship between topic chapters and the SEA Regulations

Topic Chapter	SEA Regulations
Natural Environment and Landscape	Biodiversity, fauna, flora, landscape
Population, Health and Wellbeing	Population, human health
Land, Soil and Waste	Soil, Material assets
Water Resources and Quality	Water
Air Quality and Noise	Air
Climate Change, Flooding and Coastal Change	Climatic factors
Historic Environment	Cultural heritage
Social and Cultural Infrastructure	

5.3 SEA Objectives

For each SEA topic (see above), SEA objectives have been set out, as well as key questions that will be used to inform the assessments that will be undertaken within this SEA report. SEA objectives and key questions can be found in Table 5.2.

Table 5.2 - SEA objectives and key questions

SEA Topic	SEA Objectives	Key Questions – Will our City Transport Plan 2035…
Natural Environment and Landscape	Protect and enhance the environment and important landscapes in the local area	• Affect sites designated for nature conservation? • Affect habitats or species of flora and fauna? • Affect important landscapes? • Provide opportunities to enhance the landscape or natural environment?
Population, Health and Wellbeing	Create a city where people thrive	• Affect people's ability to access active transport? • Affect people's safety?
Land, Soil and Waste	Protect and enhance soil quality	• Affect pollution run-off from roads? • Cause any loss of land or soil (from construction) • Provide opportunities to improve the land or soil?
Water Resources and quality	Protect and enhance water quality	• Affect pollution run-off from roads?
Air Quality and Noise	Reduce transport related air and noise pollution	• Affect emissions of air pollutants that impact human health? • Affect noise generated by the road and rail network?
Climate Change, Flooding and Coastal Change	Reduce transport related emissions and	• Affect carbon emissions from use of the road network? • Impact flooding from surface or ground water?
Historic Environment	Protect and enhance heritage assets and their settings	• Affect designated heritage assets? • Affect the setting of conservation areas?
Social and Cultural Infrastructure	Contribute towards an inclusive, accessible and fair city.	• Improve access to services for those with protected characteristics and at risk of transport related social exclusion?

6 Environmental Effects Assessment

6.1 Identification and analysis of environmental problems

6.1.1 The SEA Directive requires that environmental problems are identified and analysed within the Environmental Report. In this section of the report, both environmental problems and opportunities have been identified, considering the baselines set out in the scoping report, and the LTP5. Table 6.1 overleaf shows this.

Table 6.1 - Identification and analysis of environmental problems and opportunities

SEA Topic	Likely Effect	Problem	Opportunities	Project/Scheme?
Natural Environment and Landscape	+	Loss of trees	• The LTP5 includes plans to review the streetscene guidance to standardise the approach to providing street trees. Work has already been undertaken since the last LTP5 to ensure more planting is done, for example, Western Road	• Valley Gardens Phase 3 – planting of additional trees and landscaping
	+	Transport related impacts on biodiversity	• The LTP5 prioritises the use of alternative modes of transport, including public transport, active travel modes, and low and zero carbon modes.	• BSIP funded bus lanes, bus priority and accessibility subsidies for fares and routes (see Table 2.1)
Population, Health and Wellbeing	++	Road safety: road traffic casualties	• The LTP5 states that a new Road Safety Action Plan that will set out targets on reducing casualties on roads. • The plan also states that the delivery of better infrastructure for active travel could improve the feeling of safety	• School streets, Safer Better Streets, School Travel Plan Measures (see Table 2.1)

	++	Accessibility: exclusion of people with mobility impairment or those living in deprived areas	• Funding will be dedicated to a rolling programme of accessibility improvements. This includes accessibility for pedestrians when crossing roads, for example. • The LTP5 includes plans for improvements to bus accessibility	• Dropped kerb accessibility programme (see Table 2.1)
	+	Community severance: high road traffic volume, HGV volume, transport related infrastructure	• The LTP5 states that improving congestion and journey times for all road users through mobility hubs is a major objective.	• Valley Gardens Phase 3 – simplifying the road layout for motorists, introduction of signalised junctions
	+	Security: crime and fear of crime	• The LTP5 aims to create attractive public spaces that are safe and easy to get around by active travel.	• Valley Gardens Phase 3 – improvements to lighting and active travel infrastructure
Land, Soil and Waste	?	Contamination through land-based transport	• It is unknown the effects that the LTP5 will have on Land, Soil and Waste. There is no evidence to suggest that there will be a positive or negative effect	

Water Resources and quality	?	Ground water contamination through land-based transport	• It is unknown the effects that the LTP5 will have on Water Resources and quality. There is no evidence to suggest that there will be a positive or negative effect	
Air Quality and Noise	++	Reduced air quality: increasing road traffic volume congestion, CO_2 and NO_2.	• The LTP5 states that measures will be implemented to improve the air quality in the area, for example, EVs, car clubs, and an emphasis on the transition to low and zero emission vehicles	• Valley Gardens Phase 3 – improvements to active travel infrastructure e.g. cycle lanes, pedestrian crossings
Climate Change, Flooding and Coastal Change	++	Extreme weather conditions: increasing risk of flooding, disruption to the transport network, deterioration of road network.	• The LTP5 promotes the transition to low and zero emission vehicles, as well as other alternatives to reduce the impact of the transport network on climate change. In addition, ongoing programmes include measures to improve drainage structures to reduce the risk of flooding	• A strong focus on Sustainable Urban Drainage System (SUDS) as well as the addition of greening and trees to reduce impermeable areas on streets
Historic Environment	+/-	Damage and/or contamination to heritage sites	• The LTP5 makes reference to projects/schemes that will maintain historic structures such as lamp columns, however, information on this topic is limited in the	• Reconstruction of the seafront Victorian arches – A259 • Madeira Terrace

		and their settings	LTP5	restoration
Social and Cultural Infrastructure	+	Air quality damage to cultural and social infrastructure. Creation of a socially excluding transport network	• The LTP5 puts emphasis on creating a transport network that is more inclusive, with an analysis of bus services being commissioned to understand how to improve areas at risk of social exclusion. • An emphasis is also put on the delivery of accessible and sustainable transport infrastructure throughout the BHCC area.	• BSIP funded bus lanes, bus priority and accessibility subsidies for fares and routes (see Table 2.1)

7 Assessment of the LTP5 Objectives

7.1 Assessment of the environmental effects

7.1.1 The SEA Directive and Regulations require that the Council assesses the environmental effects of Brighton and Hove's fifth Local Transport Plan. This section first assesses the relationship between the LTP5 objectives and the SEA objectives. It then continues to assess alternative options, namely, do nothing, mix of modal investment, stable investment levels, increasing investment in public, shared and active travel, and increased investment focused on one travel mode.

7.1.2 Table 7.1 assesses the relationship between BHCC's LTP5 objectives and the SEA objectives set out previously in this report. 'X' indicates a positive relationship between the SEA objective and the LTP5 objective. A blank space indicates there is no clear relationship.

7.2 Identifying alternatives

7.2.1 A necessary part of the SEA process is to look at alternative methods of achieving the objectives of the LTP5 for BHCC. Table 7.3 sets out the SEA objectives and the proposed alternatives. These are then scored using the matrix used previously, shown in Table 3.3.

Brighton & Hove

PROJECT CENTRE

	SEA OBJECTIVES							
LTP5 OBJECTIVES	**Protect and enhance the environment and important landscapes in the local area**	**Create a city where people thrive**	**Protect and enhance soil quality**	**Protect and enhance water quality**	**Reduce transport related air and noise pollution**	**Reduce transport related emissions**	**Protect and enhance heritage assets and their settings**	**Contribute towards an inclusive, accessible and fair city.**
Increase public transport use		X			X	X		X
Enable the uptake and use of low and zero emission vehicles	X	X	X	X	X	X	X	X
Deliver a safe, inclusive and integrated transport system		X			X	X		X
Create well-maintained streets and pavements	X	X	X	X	X		X	X

Provide active travel choices for all and excellent public spaces		X			X	X		X
Promote and use technology to reduce and manage travel		X			X	X		X

Table 7.1 - Relationship between LTP5 objectives and SEA objectives

7.2.2 As shown in Table 7.1 above, several crossovers are present in the relationship between the LTP5 objectives and SEA objectives. All of the LTP5 objectives have a positive relationship with the following SEA objectives:

- Create a city where people thrive
- Contribute towards an inclusive, accessible and fair city

7.2.3 The SEA objectives with the least number of crossovers with the LTP5 objectives are as follows:

- Protect and enhance soil quality
- Protect and enhance water quality
- Protect and enhance the environment and important landscapes in the local area
- Protect and enhance heritage assets and their settings

7.2.4 This is due to many of the factors that may affect these objectives depend on the type of project or scheme as well as the geography of future projects or schemes.

7.3 Summary and Assessment of Alternative Options

Table 7.2 - Alternative options with descriptions and comments on the LTP5

Option	Description	Comment
Do nothing	No investment in sustainable travel modes	• Not aligned with the LTP5 vision for getting around a cleaner, fairer and growing city.
Mix of modal investment	A mix of measures in the LTP5, but the majority of spend would be on highway schemes. This would likely lead to the reduction in the investment spent on sustainable transport	• Risk of not demonstrating a package of multi modal measures that may be needed to secure funding or investment. • Does not support the vision of the LTP5, likely to result in the reduction of investment in sustainable transport projects.
Stable investment levels	A mix of highway, cycle and public transport projects and schemes	• Contributes to the vision and objectives of the LTP5. • External influences may impact the investment levels for local transport projects/schemes.
Increasing investment in public, shared and active travel	Increased focus on active travel and public transport	• Contributes to the LTP5 vision and objectives. • Contributes towards reducing carbon through promoting sustainable travel. • Aligns well with plans already set out in the LTP5 such as the move towards low and zero emissions modes.
Increased investment focused on one travel mode	LTP5 investment focused on a single mode choice. For example, investment mainly focused on active travel.	• This option would support multiple objectives set out in the LTP5 but is not likely to support on all. For example, increased investment on active travel will have a positive effect on the uptake of zero and low emission vehicles, however, may have a negative effect on the increase of public transport use. • Mode choice ultimately depends on location and journey, so this approach is unlikely to be suitable for the LTP5.

Table 7.3 - Assessment of alternative options against the SEA objectives

SEA Objective	Option 1 – Do nothing	Option 2 – Mix of modal investment	Option 3 – Stable investment levels	Option 4 – Increasing investment in public, shared and active travel	Option 5 – Increased investment focused on one travel mode
Protect and enhance the environment and important landscapes in the local area	-	+/-	+	+	+/-
Create a city where people thrive	--	+	+	++	+/-
Protect and enhance soil quality	?	?	?	?	?
Protect and enhance water quality	?	?	?	?	?
Reduce transport related air and noise pollution	--	-	+/-	++	+/-
Reduce transport related emissions	--	-	+/-	++	+/-
Protect and enhance heritage assets and their settings	-	+/-	0	0	0

Contribute towards an inclusive, accessible and fair city.	--	+	+	++	+/-

8 Monitoring

8.1 The purpose of monitoring

8.1.1 Under the SEA Directive, there is a statutory requirement to monitor the environmental impacts of the implementation of the LTP5. The LTP5 must therefore be monitored and reported to comply with the Directive as well as to continue to identify problems and issues that need resolving.

8.1.2 Monitoring is the systematic measurement of a parameter in terms of magnitude, time and space. Monitoring is not limited to quantitative or technological measurements and may include qualitative issues such as human health or landscape quality.

8.1.3 Questions that can be answered through the monitoring of the plan are:

- Is the plan contributing to the desired environmental objectives and targets?
- Is the plan performing as well as expected?
- Are mitigating measures performing as well as expected?
- Are there and undesirable environmental effects? Are these within acceptable limits, or is remedial action required?

8.1.4 This process is beneficial to the LTP5 as it allows any significant environmental effects of the plan's implementation to be identified and dealt with early in the planning process. It also allows the actual effects of the LTP5 to be assessed against those predicted in the SEA and can provide baseline information for future plans.

8.2 Monitoring for the SEA

8.2.1 To monitor the SEA, targets key performance indicators will be set out for each of the SEA objectives, with targets also being set for each objective. This will provide a baseline for the implementation of the LTP5 to be monitored and assessed throughout the planning process. Table 8.1 overleaf shows this.

Table 8.1 - Key performance indicators and monitoring targets for the SEA

SEA Objective	Key Performance Indicators	Target
Protect and enhance the environment and important landscapes in the local area	• Number of transport infrastructure projects/schemes granted contrary to advice from Natural England	• None
Create a city where people thrive	• Bus passenger statistics, number of elderly and disabled people on local bus services • Walking and cycling statistics, number of people walking and cycling to commute, for example	• Aim to maintain or increase
Protect and enhance soil quality	• None	• None
Protect and enhance water quality	• None	• None
Reduce transport related air and noise pollution	• Number of transport infrastructure projects/schemes granted contrary to advice from the Environmental Agency. • Air quality and noise monitoring, particularly in current areas of concern	• Aim to reduce or maintain
Reduce transport related emissions	• Air quality monitoring	• Aim to reduce or maintain
Protect and enhance heritage assets and their settings	• Number of transport infrastructure projects/schemes granted contrary to advice from Historic England	• None
Contribute towards an inclusive, accessible and fair city.	• Bus passenger statistics, number of elderly and disabled people on local public transport services • Walking and cycling statistics, number of people walking and cycling to commute, for example. Including people of all ages and people with disabilities.	• Aim to maintain or increase

9 Next Steps

9.1 Consultation on draft LTP5 and SEA

9.1.1 The SEA Regulations set specific requirements for consultation with the statutory consultees, the public and other interested parties and require that the environmental report is made available for consultation alongside the draft LTP5.

9.1.2 This environmental report will be made available for wider public consultation during the public consultation held in summer 2025. Both the environmental report and the draft LTP5 will be available on the Council's consultation platform, Your Voice.

9.2 SEA statement

9.2.1 When the LTP5 is adopted, it will be accompanied by an SEA post adoption statement. The SEA statement will provide the following information:

- How environmental considerations have been integrated into the plan;
- How the environmental report has been considered in the LTP5's development;
- How opinions expressed in relation to the consultations on the LTP5 and the environmental report have been considered;
- The reasons for choosing the LTP5 as adopted, in the light of the other reasonable alternatives dealt with; and
- The measures to be taken to monitor any possible significant environmental effects of the implementation of the LTP5.

Quality

It is the policy of Project Centre to supply Services that meet or exceed our clients' expectations of Quality and Service. To this end, the Company's Quality Management System (QMS) has been structured to encompass all aspects of the Company's activities including such areas as Sales, Design and Client Service.

By adopting our QMS on all aspects of the Company, Project Centre aims to achieve the following objectives:

- Ensure a clear understanding of customer requirements;
- Ensure projects are completed to programme and within budget;
- Improve productivity by having consistent procedures;
- Increase flexibility of staff and systems through the adoption of a common approach to staff appraisal and training;
- Continually improve the standard of service we provide internally and externally;
- Achieve continuous and appropriate improvement in all aspects of the company;

Our Quality Management Manual is supported by detailed operational documentation. These relate to codes of practice, technical specifications, work instructions, Key Performance Indicators, and other relevant documentation to form a working set of documents governing the required work practices throughout the Company.

All employees are trained to understand and discharge their individual responsibilities to ensure the effective operation of the Quality Management System.

Brighton & Hove

PROJECT CENTRE

Award Winning

CIHT AWARDS 2021 WINNER Employer of the Year

THE INVESTORS IN PEOPLE AWARDS 2021

ice Awards 2020 Winner

LANDSCAPE INSTITUTE AWARDS 2020 WINNER

british parking awards 2019 WINNER

british parking awards 2020 WINNER

british parking awards 2021 WINNER

Certifications

bsi ISO/IEC 27001 Information Security Management CERTIFIED

bsi ISO 14001 Environmental Management CERTIFIED

bsi ISO 9001 Quality Management Systems CERTIFIED

bsi ISO 45001 Occupational Health and Safety Management CERTIFIED

Accreditations

CIHT Diversity & Inclusion Charter

POSITIVE ABOUT DISABLED PEOPLE

INVESTORS IN PEOPLE™ We invest in people Platinum

constructionline

URBAN DESIGN GROUP REGISTERED PRACTICE

New Civil Engineer 100 COMPANIES OF THE YEAR 2018 RANKED COMPANY

Memberships

PLEDGE TO NET ZERO

CIHT Corporate Partner

ice Institution of Civil Engineers

nec GOLD Users' Group Member

RoSPA Member

Landscape Institute Registered practice

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Risk no.	Risk title	Causes	Level of risk exposure (0-5)		Current risk score	Mitigating actions	Adjusted level of risk exposure (0-5)		Target risk score
			Likelihood	Impact			Likelihood	Impact	
1	Policy or political change before approval	A change in local or national priorities (e.g. leadership change, devolution, government guidance updates) could affect the acceptance of the transport plan. However, as the plan is intended for Cabinet consideration in December, significant change is unlikely.	1	4	4	Remain flexible and adaptive to policy or leadership changes.	1	3	3
2	Uncertainty about long-term funding	Funding is allocated annually and no long-term guarantee. Hence, the 3-year programme represents a reasonable forecast based on the current capital programme.	3	4	12	Continue to lobby central government and seek grant opportunities and strengthen business cases for funding bids.	2	3	6
4	Technical or data uncertainty	Limited availability of local data or reliance on outdated datasets.	3	3	9	Use national datasets to fill the evidence gap and apply robust assumptions to produce credible results.	1	2	2
5	Loss of internal, political and public support	Disagreement with proposals in the transport plan	2	3	6	Undertake public consultation and engagement with internal teams and political leads and maintain ongoing engagement to address concerns.	1	2	2

6	Failure to balance diverse user needs	Limited spaces, funding or conflicting priorities between modes	3	3	9	Engaging proactively with communities especially underrepresented groups to ensure inclusive design	1	3	3

Brighton & Hove City Council

Cabinet

Agenda Item 88

Subject: **Regulator of Social Housing - response to Regulatory Judgement including Procurement of Stock Conditions Contractor**

Date of meeting: **11 December 2025**

Report of: **Cabinet Member for Housing**

Lead Officer: **Corporate Director Homes & Adult Social Care**
Email: Genette.Laws@brighton-hove.gov.uk

Contact Officer: **Martin Reid Director, Homes & Investment**
Email: Martin.Reid@brighton-hove.gov.uk

Ward(s) affected: All

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.

For general release

1. Purpose of the report and policy context

1.1 This report provides a six-month update on Brighton & Hove City Council's response to the Regulator of Social Housing's (RSH) C3 Regulatory Judgement (August 2024) relating to the housing Safety and Quality Consumer Standard. It sets out the current position across key areas of compliance – fire, water, electrical, smoke detection, and repairs – and evidences the improvements delivered since the Judgement, alongside the work already underway before it.

1.2 The report reflects and forms part of the council's formal intensive engagement with the RSH in relation to this standard and demonstrates that the direction of travel remains positive. Strengthened leadership, clearer accountability, and better data quality have provided a stronger foundation for sustained improvement. The council is now shifting from short-term recovery towards a more mature, systems-led approach where compliance activity is routine, data-driven, and verified through governance and resident assurance.

1.3 In parallel, the report seeks delegated authority for the Corporate Director (Homes & Adult Social Care), in consultation with the Cabinet Member for Housing, to procure and award a two-year Stock Condition Survey Contract. This decision is a direct response to the council's Root Cause Analysis, which

identified Data Quality & Use, and Prioritisation & Focus as core drivers of improvement. The contract will enable full survey coverage of all council homes, leading to an improved understanding of the condition of the council's housing stock, and provide the robust evidence base required for long-term investment planning and regulatory assurance.

1.4 The report reflects the council's wider improvement journey, which began prior to the Regulatory Judgement with early actions on governance and compliance. These actions have been accelerated and consolidated through intensive engagement with the RSH, supported by the Housing Safety & Quality Assurance Board, Corporate Leadership Team (CLT) and Cabinet-led oversight. Cabinet have considered reports on Responding to the Regulator for Social Housing's Judgement in September 2024, and a Housing Safety and Quality Compliance Update in May 2025. Place Overview & Scrutiny Committee considered the Housing Regulator Judgement, Report to Cabinet in September 2024 and Housing Safety and Quality Compliance Updates in January and September 2025.

1.5 This report aligns with the Council Plan 2023–2027 priorities of Homes for Everyone and A Responsive Council with Well-Run Services, reaffirming the council's commitment that compliance is the floor, not the ceiling, and that every resident lives in a safe, high-quality home. Cabinet oversight remains central to maintaining transparency, accountability, and confidence in the council's continuing improvement journey.

2. Recommendations

2.1 That Cabinet note the progress made in improving compliance with the Regulator of Social Housing, Safety & Quality Consumer Standard since the last Cabinet update in May 2025.

2.2 That Cabinet delegate authority to the Corporate Director (Homes & Adult Social Care), in consultation with the Cabinet Member for Housing, to procure and award a two-year Stock Condition Survey Contract via procurement of specialist contractor, with an estimated value of £2 million, and to take all necessary steps to mobilise and manage the contract.

3. Context and background information

Progress since the Regulatory Judgement

3.1 On 9 August 2024, following intensive engagement, the Regulator of Social Housing issued a C3 Regulatory Judgement for Brighton & Hove City Council, identifying failings against the Safety and Quality Standard. A C3 Judgement means the Regulator found the council was failing to meet the required consumer standard for the safety and quality of homes and significant improvement was required. The Regulator highlighted weaknesses in the council's management of electrical, fire, water and smoke-detection safety, a significant repairs backlog. Since that time the council has remained in formal intensive engagement with the Regulator. The council has taken decisive

action to address each area of concern. The Regulator has confirmed thar the Judgement can only be amended through a formal inspection visit that will take place within the next two years.

Table 1: progress since RSH judgement against areas identified as non-compliant.

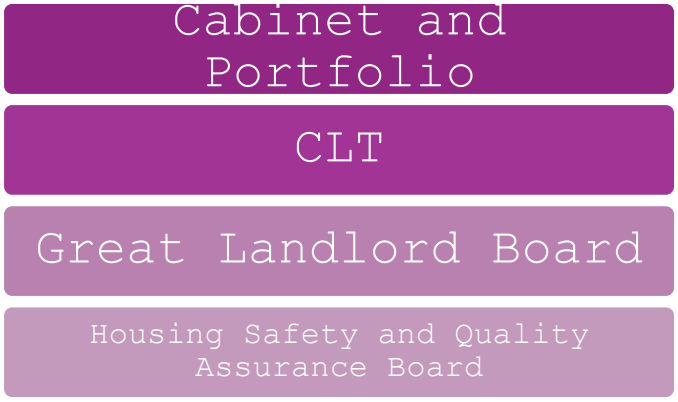
Areas	RSH judgement August 2024	June 2024 data	Position now (Oct 2025)
Electrical safety (domestic Electrical Installation Condition Report, EICR, and communal EICRs)	Around 3,600 homes without a current EICR and no evidence of a current certificate for over 600 communal areas.	53 percent homes with a valid 5-year EICR. 20.8 percent communal areas with a valid communal EICR.	93 percent homes with valid 5-year EICR. 77.3 percent communal areas compliant.
Smoke alarms	Cannot evidence compliance with legal requirements for smoke detectors.	81.5 percent of homes had a working alarm.	99.4 percent of homes have a working alarm.
Water safety (risk assessments and remedial actions)	More than 600 buildings require a risk assessment" and "more than 500 overdue water safety remedial actions."	52.1 percent of buildings with a valid risk assessment. (Nov 2024 - no June actions count published.)	90.4 percent of buildings with a valid assessment; 2,695 overdue actions (Sept 2025). This aligns to the significant increase in inspections.
Repairs backlog	A backlog of around 8,000 low-risk, low-priority repairs.	9,653 repairs older than 28 days.	2,479 repairs older than 28 days.
Fire safety remediation	RSH raised concerns about delays in completing over 1,700 fire safety actions identified across the stock.	4,253 FRA actions. Peaked at 8,268 in December 2024 with completion of updated FRAs on all blocks.	2,918 live FRA actions.

3.2 Over the past year the council has moved from recovery to consolidation and improvement, achieving substantial progress across all compliance areas while remaining realistic about where further work is required. The service has focused on closing the most critical safety actions, strengthening leadership and governance, improving data reliability and rebuilding confidence in the quality and safety of council homes. These improvements are being embedded into business-as-usual systems to ensure they are sustained and auditable. Residents are now experiencing clearer communication, faster

responses to safety issues and more visible safety works in their homes and blocks.

3.3 Governance has been strengthened through director-led oversight and the Housing Safety and Quality Assurance Board, supported by specialist appointments in fire and water safety. Delivery and financial risks (including access, contractor capacity, inflationary pressure on specialist works and temporary waking-watch costs) are monitored through the Corporate Risk Register, reported to CLT and the Cabinet Member, and reviewed through the Board each month.

Chart 1: Governance overview



3.4 The council continues to take a risk-based approach to ensure that we are prioritising the highest hazards first while strengthening data reliability. Mitigations include escalation under the no-access (to private dwellings) procedure, increasing contractor capacity, and monthly data-assurance checks re compliance activities. The direction of travel remains positive, with governance providing clear visibility of both progress and areas that still require improvement.

3.5 Sustaining improvement is now the council's central focus. Compliance performance is monitored monthly through director-led governance, with data assurance and early-warning triggers in place to prevent regression and ensure progress remains consistent across all compliance areas. Lessons from the past 18 months reflects the themes in the root cause analysis: stronger contractor management; improved data visibility through the NEC Housing system; and clearer ownership of compliance actions at every level, are being embedded into the service's continuous improvement plan.

3.6 These improvements mean that residents are experiencing clearer communication, faster responses to safety issues and more visible safety works in their homes and blocks. The council continues to work with residents to improve access for safety checks and to build confidence that their homes meet modern, compliant safety standards.

Progress against areas identified by the Regulator as non-complaint

3.7 **Fire safety** was one of the Regulator's key areas of concern, with assessments and remedial actions not previously completed in a timely way. In 2024 the total number of live fire-risk-assessment (FRA) remediation actions across the housing stock peaked at 8,228 following completion of updated fire risk assessments across all our blocks. As at October 2025, this number had reduced to 2,918, a reduction of more than 60 per cent. Within this total, the number of total high-risk actions fell from 417 in August 2025 to 14 in October 2025, and medium risk actions fell from 456 to 32 in the same time period. Each action is tracked to completion with named owners and verification checks. 2,872 low-risk actions remain, which are being managed through the council's dedicated fire-safety programme, prioritised by building risk and monitored through the fire-safety tracker.

3.8 L5 fire-alarm systems are being installed across eight large-panel-system blocks, including to support simultaneous evacuation and enable the removal of waking watch where in place and in agreement with East Sussex Fire and Rescue Service (ESFRS). Fire-door upgrade works are being taken forward at the Bristol Estate under compliant and closely managed oversight.

3.9 The council anticipates completion of the remaining fire safety actions and L5 installations by April 2026, maintaining close engagement with ESFRS to validate completion and update Fire Risk Assessments.

3.10 **Electrical safety** was also identified as an area of concern due to the number of overdue inspections and incomplete records. As of October 2025, 93% of our homes are within a compliant 5-year domestic testing programme, compared to just over half of all homes at the time of the Judgement. All Category 1 (C1) and Category 2 (C2) hazards identified at inspection are addressed as part of our certification. The electrical testing programme remains on trajectory to achieve full compliance by December 2026. The focus for the coming year is to sustain throughput, complete communal inspections, which have been undertaken on a risk prioritisation basis and now cover 77.3% of all communal areas, and continue improving record accuracy within the NEC system.

3.11 **Water safety** remains the most fragile area of compliance and continues to receive intensive director-level oversight. Performance has stabilised through weekly contractor meetings and strengthened leadership. A new Water Safety Specialist joined the council in October 2025 to improve both technical and data capacity. A comprehensive tank-remediation programme is being prepared for mobilisation from December 2025. The council recognises that it is not yet where it needs to be on water safety, and this remains a top priority. The next stage is to embed the new governance model, mobilise the remediation programme and improve contractor performance and data resilience.

3.12 **Smoke detection** had previously lacked consistent assurance that alarms were fitted and working in all homes. Installation and validation work has confirmed that as of October 2025, 99.4 per cent of homes have smoke detection, with 86 properties remaining, some under the no-access procedure.

Where hard wired smoke detection has not yet been fitted as part of a parallel works programme, battery powered smoke alarms have been installed to ensure compliance. The council expects to achieve full validation by December 2025 and has introduced an annual testing and reconciliation process to maintain compliance.

3.13 **Repairs and maintenance** were highlighted by the Regulator because of a significant backlog of overdue routine repairs. In June 2024, the total number of open repairs over 28 days stood at 9,653, reflecting historic backlogs that built up during and after the pandemic. By October 2025, this had reduced to 2,479, representing a reduction of almost three-quarters. The majority of remaining jobs are now within standard business-as-usual levels, although some older and more complex cases continue to be tracked through the backlog recovery plan. September 2025 recorded the highest inflow of new repairs since Council records began, driven by proactive damp-and-mould outreach ahead of the implementation of Awaab's Law. Overall more orders continue to be completed than the number of repairs raised each month, and workflows have been redesigned to align with statutory timescales. The service is maintaining a no-substantive-backlog position and continues to monitor completion rates and resident satisfaction to ensure sustained improvement.

3.14 **Data quality and oversight** has been identified as underlying weaknesses across all areas. These have been strengthened through monthly director-led meetings and the operation of the Housing Safety and Quality Assurance Board, which provides systematic oversight of compliance performance. A data-assurance routine covering source, validation and reconciliation has been embedded, and measures are in place to identify any deterioration in performance. A full Stock Condition Survey would complete the picture by providing comprehensive and validated data on the condition of all council homes within two years.

3.15 As a learning organisation, we are taking the learning from the different workstreams and the expertise of colleagues from across the council to sustain, further embed, and where necessary accelerate improvements in all areas of compliance. Compliance performance is monitored monthly through director-led governance, with data assurance and early-warning triggers in place to prevent regression and ensure that progress remains consistent across all compliance areas. The council has also identified common factors driving improvement across all services, including increased capacity in key regulatory and delivery roles such as fire safety, building safety and repair operatives, stronger contractor management, improved data visibility through the NEC Housing system and clearer ownership of compliance actions at every level. These lessons are being embedded as part of the service's approach to continuous improvement.

Other areas of safety and quality compliance

3.16 As part of our commitment to being a Great Landlord for our tenants and leaseholders we not just focused on the specific areas of compliance cited in

the Regulatory Judgement. Although not raised in the Regulator's judgement, the council continues to monitor and improve performance across all other statutory compliance areas.

a) Housing Health and Safety Rating System (home condition): Category 1 hazards reduced from 46 in August to 17 in September through targeted interventions. Re-inspections are scheduled and non-access cases are managed under approved procedures that include welfare checks.
b) Gas and fuel safety: All domestic and communal gas certificates are in date.
c) Asbestos management: Rolling re-inspection programme covering common ways is continually in progress to ensure full compliance is maintained.
d) Lift and lifting equipment safety: Servicing compliance under the Lifting Operations and Lifting Equipment Regulations is 100 per cent.
e) Carbon monoxide detection: 99.9 per cent of dwellings have carbon monoxide detection / alarms.
f) Leadership and culture: The council continues to promote a learning and resident-centred culture under the Great Landlord vision, ensuring staff empowerment and transparency in risk management. These improvements underpin the council's ambition to offer safe, high-quality services for all residents.

From recovery to systems-led assurance

3.17 The Root Cause Analysis presented to Cabinet in May 2025 identified six themes that explain the council's past compliance challenges. These were Resident Voice, Leadership and Culture, Data Quality and Use, Workforce Capacity and Capability, Prioritisation and Focus, and Responsibility for Compliance, which includes the management of contracts.

3.18 The council has made progress in addressing these areas and is bringing all learning together through a single Housing Delivery and Improvement Plan, to be completed by January 2026. The plan will provide one clear framework for progress and accountability, setting out actions, milestones and measures of success. It will be shaped by the feedback from residents and staff gathered through the Creating Great Homes Together consultation, regulatory consumer standards, and our vision for being a Great Landlord.

3.19 The Housing Delivery and Improvement Plan will include development of a Target Operating Model that is currently being developed for Housing Investment & Asset Management, and the Compliance Teams, and will sit within the council's corporate improvement framework (A Learning Council).

3.20 The Housing Delivery and Improvement Plan will embed a consistent approach to leadership, culture and resident engagement, ensuring that improvement is informed by the resident's voice, activities are well-resourced and improvement is sustained. This means one clear plan that brings together everything the council is doing to manage the safety and quality of homes and be responsive to the needs and preferences of tenants.

Stock Condition Survey Procurement

3.21 The Regulator of Social Housing's consumer standards require landlords to maintain a clear and current understanding of the condition of their homes. This is a statutory obligation under the Safety and Quality Standard. The council's root-cause analysis, undertaken as part of the response to the August 2024 judgement, identified weaknesses in the consistency of records and the integration of data systems. These limitations affected assurance about stock condition, maintenance and long-term investment planning. A report published by the Regulator in July 2025 reinforced the importance of landlords understanding their homes through comprehensive and up-to-date stock data, enabling earlier identification of hazards and more effective long-term financial planning.

3.22 In addition, Awaab's Law came into force on 27 October 2025. This new legislation mandates social landlords to investigate and resolve reported issues of damp, mould and other emergency hazards within strict timescales. The law will initially focus on damp and mould, with further housing hazards expected to be included and introduced during 2026. The completion of stock condition surveys will assist the council with legislative and regulatory compliance through the detection of issues and further demonstrate our commitment to proactively identifying, treating and preventing damp and mould within our tenants' homes.

3.23 The council's in-house stock-condition arrangements have progressed more slowly than projected when first established. Approximately 15.2 per cent of council-owned dwellings have had a survey recorded on the NEC housing system between March 2024 and October 2025. Our current resource of two in-house stock condition surveyors cannot achieve full coverage within the original five-year programme.

3.24 The council now intends to procure additional capacity so that all homes are surveyed within the next two years. Accelerating the programme will provide a complete and validated evidence base, strengthening compliance assurance and enabling informed investment planning. This reflects the principle that compliance is the floor, not the ceiling, and marks a shift from recovery to a proactive model of asset management.

3.25 Earlier and fuller data will allow the council to target investment where it most improves safety, quality and resident experience. It will support prevention of issues such as damp and mould, align building-safety works with major-works programmes and integrate retrofit and decarbonisation planning to reduce future costs. The same data will underpin the Housing Asset Management Strategy, future bids for capital investment and the Housing Revenue Account Medium Term Financial Strategy and 30-year Business Plan, supporting improved prioritisation, targeting of capital investment and value for money, including by reducing reliance on responsive repairs. The data will also inform corporate decisions on capital planning, climate commitments and financial resilience within the Housing Revenue Account. Understanding our homes in this way is fundamental to being a Great Landlord: it allows the council to

invest wisely, prevent problems and protect future generations of tenants. The programme will also place the council in a strong position to evidence compliance with the emerging review of the Decent Homes Standard and to prioritise future investment to meet new and emerging legislative and regulatory requirements.

3.26 Preparatory work, including a specification and data-integration protocols, has been completed to enable prompt mobilisation once Cabinet approval is secured. The estimated contract value is £2 million over two years, based on market analysis, benchmarking against the 2019 to 2020 programme and information from other social landlords that have undertaken similar work. Funding will be met from the Housing Revenue Account within the compliance and asset-management budgets approved by Cabinet for 2025 to 2026. Performance data will be overseen by the Contract Manager and reported through the Housing Safety and Quality Assurance Board, with monthly reporting on progress, budget and data quality. Mobilisation is expected to begin in spring 2026, with completion by spring 2028.

3.27 Procurement of a specialist contractor will be carried out to ensure quality, transparency and value. The appointed contractor will be required to complete comprehensive, high-quality stock-condition surveys across all council homes within two years, and to produce milestone summary reports showing key findings and investment requirements at agreed stages of the programme.

3.28 We propose to engage with residents in the procurement process, particularly considering quality elements of the contract such as customer service, resident engagement and being a considerate contractor.

3.29 The outcome of this procurement will be a complete, reliable and independently auditable picture of the council's housing stock. The new data will inform planned and major programmes of work and provide the foundations for the service 30 year HRA Business Plan. The council will utilise the time period over which the procured stock condition survey is undertaken to build in-house capacity and capability and ensure that future surveys can be maintained on a rolling basis without external support. For residents this will mean homes that are safer, warmer and better maintained, and clearer communication about planned works. The council will demonstrate that it knows its homes, acts on evidence and uses its resources responsibly to protect the condition of homes and plan investment for the future.

4. Analysis and consideration of alternative options

Progress against RSH concerns

4.1 The council continues to review and analyse progress against the areas of concern identified by the Regulator of Social Housing (RSH) in the August 2024 judgement. Formal monitoring meetings take place each month, and the Regulator has acknowledged steady improvement in the quality and

timeliness of the council's data and assurance reporting. The direction of travel remains positive. The council's focus is now on sustaining this progress, embedding consistent systems and culture, and addressing the remaining areas that require further work, particularly water safety and the integration of compliance data. Progress updates will continue to be shared with the Regulator as part of the council's formal engagement programme.

Procurement options for completing stock-condition surveys

4.2 A range of options have been considered to deliver this work. These are summarised below, together with an assessment of their risks and benefits.

4.3 Option 1: Procure a specialist contractor (recommended option)
This option would deliver full survey coverage within two years. It provides the capacity and specialist expertise needed to complete high-quality, accredited surveys and ensures that results are independently validated. This approach reflects best practice and responds to the Regulator's expectation that landlords understand the condition of every home they manage.

4.4 Option 2: Rely on in-house surveyors
The current in-house team of two surveyors would continue to deliver surveys under the existing rolling programme. This approach would achieve full coverage only over a period of at least five years. It would not provide the pace or independence required to assure the Regulator or support the council's investment and compliance planning. It would also increase the risk of inconsistent data quality due to limited resource and time.

4.5 If the procurement does not proceed, the council would not be able to complete surveys within the remaining two-year period and would continue to operate with partial and ageing stock-condition data. This would delay progress in identifying hazards or Decent Homes Standard failures and would limit the council's ability to produce an accurate long-term investment plan. It would also risk non-compliance with the Regulator of Social Housing's consumer standards and weaken the assurance framework that underpins the council's Building Safety, Fire Safety and Asset Management responsibilities. Risks associated with delivery are captured within the corporate strategic risk SR39 and monitored through the Housing Safety and Quality Assurance Board.

4.6 The recommended option provides the quickest and most reliable route to assist with regulatory expectations and to building the detailed asset knowledge required for long-term, value-for-money investment decisions. Financial performance of the contract will be monitored by the contract manager monthly and through the Targeted Budget Management (TBM) process and reported monthly to the Housing Safety and Quality Assurance Board.

5. Community engagement and consultation

5.1 The council continues to engage residents on progress since the Regulator of Social Housing's C3 judgement. Quarterly Area Panels receive updates on safety and quality, performance, and planned next steps, with questions captured and fed back into service delivery. These sessions provide a standing forum for scrutiny and for tracking progress against the themes highlighted by the Regulator.

5.2 Dedicated engagement continues at high-rise and Large Panel System blocks, including the Bristol Estate. Residents are informed through letters, notices, drop-ins and on-site tenancy visits. These activities support access for inspections and works, explain changes to evacuation strategies where relevant, and provide a route for individual concerns to be resolved quickly.

5.3 The council uses the tenant newsletter Homing In to provide regular citywide updates on safety, compliance and planned programmes. This includes plain-English explanations of what residents can expect before, during and after inspections or works, and signposts to further support.

5.4 Engagement feedback from Area Panels, building-specific activity at LPS and Bristol Estate, and Homing In will continue to be collated and reported through housing governance so that resident insight informs decisions and supports the council's vision of becoming a Great Landlord.

5.5 The Creating Great Homes Together consultation has involved residents and staff in co-designing service improvements. By the time of this report, consultation will have closed and the council will use the findings to inform priorities in the Housing Improvement Plan and to shape how services communicate and deliver at block and neighbourhood level.

5.6 For the stock condition survey programme, the council will follow clear resident communication protocols. Surveyors will carry identification, residents will receive advance notice of appointments, and reasonable adjustments will be offered for vulnerable households. Data will be recorded to the council's housing system and used to improve the safety, quality and upkeep of homes.

5.7 The survey results will provide data for our Asset Management System to inform our decisions on priorisation of investment in planned and major capital works to our homes and continual review of our Asset Management Strategy. As this work progresses, the council will create opportunities to test and learn different ways of engaging residents on priorities and approach. This will include targeted sessions at estate and neighbourhood level, and structured feedback on how investment plans reflect what residents say will make the greatest difference to safety, quality and day-to-day living.

6. Financial implications

6.1 The first recommendation in this paper is for noting only. The second recommendation is seeking approval to procure external consultant services to conduct a stock condition survey covering the Council's Social Housing stock.

6.2 The resulting information from the survey will enable the HRA to allocate the scarce capital maintenance budgets for major works in the most effective way, based on accurate data. Although the survey will drive the capital programme, it is itself revenue in nature and will need to be funded by the HRA Revenue Budget.

6.3 The 30-year HRA Business Plan is currently in the process of being updated. This update will include the allocation of an annual revenue budget of approximately £1m to cover the estimated cost of the Stock Condition Survey (over 2 financial years) and will also include budgets for capital investment from which the works identified to be carried out following the Stock Condition Survey would be funded.

6.4 It is understood that the Housing Investment & Asset Management service does not have sufficient capacity at this time to be able to carry out the Stock Condition Survey in-house so an external consultant procured through a framework will enable the council to take advantage of economies of scale which would not be possible if the survey was undertaken internally.

6.6 Given this will be a multi-year contract, it is expected that inflation will be added, especially since the majority of the cost is related to staffing. The likely inflation measure has not been determined yet for this procurement exercise, but the Business Plan assumes inflation for this item of expenditure in line with RPI, so should cover any inflation that may arise through the contract negotiation.

Name of finance officer consulted: Sophie Warburton Date consulted (19/11/25)

7. Legal implications

7.1 This report provides an overview of Brighton & Hove City Council's progress in addressing housing safety and quality compliance.

7.2 The Social Housing Regulation Act came into effect from 1 April 2024 and requires social landlords to comply with the standards set by the Regulator of Social Housing (RSH). On 9 August 2024 the Regulator of Social Housing issued a C3 regulatory judgment that there are serious failings in the Council as landlord delivering the outcomes of the consumer standards and significant improvement is needed specifically in relation to outcomes for the national Safety and Quality Standard.

7.3 The Regulator expects the Council as landlord to continue to drive significant change. The Regulator has very substantial powers of enforcement available but is not proposing to use enforcement powers at this stage, provided Brighton and Hove CC continues to seek to resolve these issues.

7.4 The issues identified in the report are relevant to the Council’s ability to meet multiple legal obligations and regulatory standards. As well as the RSH,

compliance falls under the scrutiny of the Building Safety Regulator, the HSE and East Sussex Fire & Rescue Service. The Council must comply with the enforcement notices issued by the fire service.

7.5 There is the potential for the council to be exposed to compensation claims arising from disrepairs which have not been addressed on a reasonable timescale.

7.6 The report seeks to delegate authority to the Corporate Director (Homes & Adult Social Care), in consultation with the Cabinet Member, Housing, to procure and award a two-year Stock Condition Survey Contract via procurement of specialist contractor with an estimated value of £2 million. The procurement must be conducted in accordance with the relevant procurement legislation, the Council's contracts standing orders, and will be the subject of further legal and procurement advice as necessary.

Name of lawyer consulted: Natasha Watson Date consulted: 2.12.25

8. Equalities implications

8.1 Improving housing safety and quality has clear equality benefits. The council's compliance programmes address risks that disproportionately affect some residents, including older and disabled people, families with young children, and those living with long-term health conditions. Reducing hazards such as fire, damp and mould, cold and electrical risk supports better health and wellbeing and helps to narrow inequalities in housing outcomes.

8.2 Stock-condition surveys depend on residents' consent and cooperation rather than legal enforcement to gain access. Some residents may face greater barriers to engagement, including disabled people, older residents, those with language or communication needs, and people with caring or safeguarding responsibilities.

8.3 To ensure equality of access, the council will provide clear and accessible information, flexible appointments, translation or alternative formats where required, and respectful, trauma-informed practice by identified and DBS-checked staff. Where access continues to be a challenge, Housing compliance teams and Tenancy Services will work together to provide support and engagement, using relationship-based approaches rather than enforcement.

8.4 Procurement documentation will require suppliers to evidence inclusive and anti-racist practice, workforce diversity and safeguarding awareness. The contract will include the council's standard equality and anti-racism clauses, monitored through regular performance meetings.

9. Sustainability implications

9.1 The housing safety and quality programmes described in this report contribute positively to the council's wider sustainability objectives by improving the

condition, efficiency and lifespan of homes. The proposed stock-condition surveys will provide detailed information on the state of the housing stock, which will support future planning for energy efficiency, decarbonisation and resource use.

9.2 Survey activity will have some temporary environmental impact through travel, digital data storage and the use of survey equipment. These impacts will be minimised by efficient route planning, use of low-emission or electric vehicles by contractors, and digital rather than paper-based reporting. The procurement documentation will include evaluation criteria for environmental performance and social value, in line with the council's Sustainable Procurement Policy.

9.3 In the longer term, the survey data will enable better-targeted investment in energy performance measures such as insulation, ventilation, and low-carbon heating. It will also support the council's compliance with the Minimum Energy Efficiency Standards and delivery of its Carbon Neutral 2030 ambition. The same data will assist in managing materials more efficiently and reducing waste through planned maintenance rather than reactive works.

9.4 No significant negative sustainability impacts have been identified beyond the short-term operational footprint of the survey programme. These will be managed through the contract, which will include requirements for waste minimisation, responsible sourcing, and sustainable travel.

10. Health and Wellbeing Implications:

10.1 The council's compliance and safety programmes have a direct positive impact on residents' health and wellbeing. Safer, warmer and well-maintained homes reduce the risks of fire, damp and mould, electrical hazards and cold-related illness. They also contribute to improved mental wellbeing by providing greater security and reassurance for residents.

10.2 The stock-condition surveys will help the council identify hazards earlier and plan targeted investment to improve living conditions, particularly for residents most at risk of poor health outcomes, including older and disabled people, families with young children and those living with long-term conditions. Better data will also support actions to reduce fuel poverty and improve energy efficiency, supporting the city's public health and carbon reduction goals.

10.3 The council recognises that inspections and works can cause short-term disruption or anxiety, especially for residents with additional needs. These impacts will be mitigated through clear communication, advance notice, and flexible appointment scheduling, with support from Housing compliance and Tenancy Services teams where necessary.

10.4 Taken together, the compliance programmes and the proposed stock-condition survey contract will strengthen the link between housing quality and health, help to reduce health inequalities across the city and support the

council's wider objective of improving the wellbeing of residents and communities.

11. Procurement implications

11.1 The first recommendation in this paper is noted. The second recommendation is referred to here as it has direct procurement impact.

11.2 It is noted that the Housing Investment & Asset Management Service does not have sufficient capacity to deliver the Sock Condition Survey in house.

11.3 Therefore, the most viable process will be to externally procure support to effectively deliver this service.

11.4 It would be prudent to build in some contractual contingency around an potential extension should that be needed to supplement the in-house provision - a 12 month period may be sensible - this could then be enacted if required at a later date (funding allowing).

12. Crime & disorder implications:

12.1 Under section 17 of the Crime and Disorder Act 1998, the council must consider the potential impact of its decisions on crime and disorder and do all it reasonably can to prevent them.

12.2 The procurement of surveyors does not in itself present any direct crime or disorder risks. Contractors will be required to hold Disclosure and Barring Service (DBS) checks, carry identification, and follow safeguarding and lone-working procedures. These measures will ensure the safety of residents and staff during home visits.

12.3 There are no negative crime or disorder implications identified. The overall impact of the programmes is to enhance safety, strengthen trust between residents and the council, and contribute to the wider objective of preventing crime and antisocial behaviour in local communities.

13. Conclusion

13.1 The council remains in formal engagement with the Regulator of Social Housing following the C3 Regulatory Judgement issued in August 2024. The direction of travel continues to be positive, with measurable progress across all areas of safety and quality and strengthened governance now in place. An acceleration in improvement in water safety and in integrating compliance data is required; these areas will continue to receive focused attention through senior leadership oversight.

13.2 The next phase is to embed improvement as business as usual. This will be driven through the Housing Improvement Plan, the Target Operating Model and the outcomes of the Creating Great Homes Together consultation, creating one framework for delivery, accountability and resident engagement.

13.3 As part of this approach, Cabinet is asked to delegate authority to procure and award the Housing Stock Condition Survey Contract.

13.4 Together these actions strengthen compliance with the consumer standards, provide a sound foundation for long-term stewardship of the housing stock and demonstrate the council's continuing commitment to its Great Landlord vision: to ensure every resident lives in a safe, well-maintained and high-quality home.

Appendices

1. Housing Safety and Compliance Performance Indicators

Appendix 1: Housing Safety and Compliance Performance Indicators

Areas identified by RSH as not compliant

	Jun 24	Sep 24	Dec 24	Mar 25	Jun 25	Sep 25	Oct 25
Smoke alarms/ detectors (% of homes)	81.5%	89.4%	95.7%	97.7%	98.8%	99.3%	99.4%
5 Year EICR domestic testing (% of homes)	53.0%	60.1%	67.9%	75.5%	84.1%	91.8%	93.0%
10 Year EICR domestic testing (% of homes)	72.0%	76.4%	80.9%	86.7%	91.9%	95.8%	96.6%
Communal EICRs (% of communal areas)	20.8%	33%	43.9%	48.5%	61.%	76.6%	77.3%
Repairs over 28 days - HRA	9,653	6,599	6,950	4,134	2,898	2,496	2,479

Areas identified by RSH as not compliant (continued)

	Jun 24	Sep 24	Dec 24	Mar 25	Jun 25	Sep 25	Oct 25
FRAs in High Rise buildings (% of buildings)*	100%	100%	100%	30.4%	58.7%	97.8%	100%
FRAs in Medium Rise buildings: (% of buildings)	100%	100%	100%	100%	100%	100%	100%
FRAs Low Rise buildings: (% of buildings)	20.9%	92.9%	99.4%	99.8%	98.8%	100%	100%
FRA remediation actions (snapshot number of live actions)	4,253	8,228	8,268	6,420*	6,071	3,180	2,918
Legionella Risk Assessments (% of buildings covered (of 12,672)			57.1%	62.1%	81.0%	90.43%	Month time lag

Wider Safety and Quality compliance data

Carbon Monoxide Detection / Alarms	Jun 24	Sep 24	Dec 24	Mar 25	Jun 25	Sep 25	Oct 25
Total detection in **domestic** dwellings		96.6%	97.9%	98.8%	99.6%	99.8%	99.9%

Gas/Fuel Safety	Jun 24	Sep 24	Dec 24	Mar 25	Jun 25	Sep 25	Oct 25
Communal Boilers certification in date - annual	100%	100%	100%	100%	100%	100%	100%
Domestic dwellings certification in date – annual	100%	100%	100%	100%	100%	100%	100%
Properties with a capped gas supply - reduction in numbers	40	32	24	19	20	22*	23*

Asbestos Safety	Jun 24	Sep 24	Dec 24	Mar 25	Jun 25	Sep 25**	Oct 25**
Common ways – Total rolling compliance	99.4%	99.6%	99.8%	100%	100%	97.38%	82.34%
Asbestos Re-inspection programme – Common ways. Rate of progress		17.06%	94.9%	100%	24.7%	60.7%	73.6%

Lift Safety (lifts & lifting equipment)	Jun 24	Sep 24	Dec 24	Mar 25	Jun 25	Sep 25	Oct 25
Communal (Passenger) lifts (LOLER) servicing	100%	100%	100%	97.5%	98.35%	97.54%	100%
Domestic lift and stair lift, equipment servicing	100%	100%	100%	100%	100%	100%	100%

Brighton & Hove City Council

Cabinet Briefing

Agenda Item 89

Subject: **Homelessness and rough sleeping strategy 2025 to 2030**

Date of meeting: **11 December 2025**

Report of: **Cabinet Member for Housing**

Lead Officer: **Genette Laws, Corporate Director for Homes & Adult Social Care**

Contact Officer: **Harry Williams, Director of Housing People Services**

Email: harry.williams@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 and policy context

1.1 Under the Homelessness Act (2002) all housing authorities must have a homelessness strategy based on a review of all forms of homelessness in their district. The strategy must be renewed every 5 years. The draft homelessness and rough sleeping strategy 2025 to 2030 sets out plans to prevent and reduce homelessness and rough sleeping and for ensuring that sufficient accommodation and support are available for people who are at risk or those who become homeless.

1.2 The draft strategy, revised following public consultation, can be found at Appendix 1. It contributes to the delivery of Outcome 2 in the council plan: A fair and inclusive city. Development of a strategy is identified as an action in both the council plan 2023 to 2027 and the housing strategy 2024 to 2029.

1.3 The proposed priorities for the homelessness and rough sleeping strategy 2025 to 2030 are to:

1. Increase our effectiveness in preventing homelessness and rough sleeping
2. Improve temporary accommodation pathways and experiences
3. Improve joined-up support with our partners for people who need most help
4. Tackle homelessness in children, families and young people

2. Recommendations

2.1 Cabinet agrees to adopt the Homelessness and Rough Sleeping Strategy for 2025 to 2030.

2.2 Cabinet delegates authority to the Corporate Director – Homes & Adult Social Care, in consultation with the Cabinet Member for Housing and the Cabinet Adviser for Homelessness to agree council led actions for inclusion in a joint delivery plan and structure agreed with our partners.

3. Context and background information

3.1 There is a national homelessness and rough sleeping crisis. At the end of 2024, there were 127,890 households living in temporary accommodation, representing a 13.6% annual increase. These households included 136,908 children under 18. Households with children increased by 13.7% to 81,060, and adult only households by 13.3% to 46,830. The annual national rough sleeping snapshot for 2024 identified 4,667 people sleeping rough. The national rate of people sleeping rough rose from 6.8 per 100,000 population in 2023 to 8.1 per 100,000 in 2024.

3.2 The last national rough sleeping strategy, *Ending Rough Sleeping for Good*, expired in 2025 and set out a four-pronged approach of prevention, intervention, recovery and a more transparent and joined-up system. Soon after coming to office in 2024, the current government announced the first cross-government national homelessness strategy, to be published in 2025 following the multi-year spending review. Other measures announced included increases in social and affordable housing supply and the abolition of Section 21 no-fault evictions through the Renters' Rights Bill (now the Renters' Rights Act). We still have no date for the publication of the national strategy.

3.3 In line with the national picture, there is an increasing number of people experiencing homelessness in Brighton & Hove. Analysis by Shelter in 2024 indicated that homelessness affects around 1 in 77 people in the city (3,580 people). They estimated that at the end of June 2024 there were 3,528 people experiencing homelessness and living in temporary accommodation. A further 52 people were sleeping rough.

3.4 Shelter also estimated that there were 1,411 homeless children in the city: almost 40% of the total homeless population. At the Census 2021 children made up 17.1% of the city's population. Most of the children experiencing homelessness were living in temporary accommodation. At the end of 2024, 47% of households in temporary accommodation contained children.

3.5 Rough sleeping is also rising, reflecting national and regional trends. The rate of rough sleeping in Brighton & Hove was 30 per 100,000 population in March 2025, up from 20 per 100,000 in October 2020. Brighton & Hove has the joint 19th highest rate of rough sleeping in England.

3.6 Trends in homelessness in the city, alongside other evidence informing the strategy, are set out in more detail in the *Review of Homelessness in Brighton & Hove 2025* at Appendix 2. The review makes 22 recommendations which have informed the strategy. The review identifies the need to move the approach to prevention 'upstream', identifying risk and intervening earlier, the need to improve the standard of temporary accommodation and the need to improve integration and partnership working when providing support for the most vulnerable.

3.7 There are specific legal duties that the council, as the local housing authority, must comply with. These include providing information and advice and preventing or relieving homelessness. If homelessness cannot be prevented the council may have a duty to help applicants find a settled home if they are eligible, have a priority need and other tests are met. There are other duties relating to homelessness, including the Duty to Refer, and responsibilities under the Children Act 1989, that also apply to the council's partners. There are some duties owed by adult social care in limited circumstances.

3.8 Homeless applications have been rising since 2021. In 2024, 2,624 households approached the council for help either because they were at risk of homelessness or because they were homeless. If people approach us before they become homeless, we can often help them stay in their home or find an alternative. 594 households approached the council for help before they became homeless in 2024. However, the number of households approaching the council after they had already become homeless rose from 993 in 2021 to 1,230 in 2024.

3.9 Prevention is central to our strategy because it offers the best outcomes for individuals while making the most effective use of limited resources. Homelessness can create or worsen trauma, disrupt employment and education, and damage physical and mental health in ways that become increasingly difficult and costly to address. Our first priority is to increase our effectiveness in preventing homelessness and rough sleeping. By working with our partners, sharing information and using digital technologies we aim to get better at identifying who might be at risk and offer support before they reach crisis point.

3.10 While people's homeless applications are being processed or while they are waiting to be rehoused, they may be placed in temporary accommodation. After falling between 2020 and 2022, the use of temporary accommodation by the council has again risen, with 1,928 households living in temporary accommodation at the end of 2024. We know from national evidence and local data, that living in temporary accommodation has adverse effects on people's health and wellbeing, employment, education and training, and other outcomes. Our second priority, therefore, is to improve temporary accommodation pathways and experiences. As well as reducing the inflow into temporary accommodation through better prevention, we aim to improve move on into settled accommodation and improve the quality and suitability of the temporary accommodation available to us.

3.11 More people are approaching services with significant and often complex needs. 68% of applicants owed a relief duty (that is people already experiencing homelessness) had at least one additional support need. The 4 most common support needs are:

- a history of mental health problems,
- physical ill health and disability,
- drug dependency, and
- experience of domestic abuse.

3.12 Data from a recent audit of people with Multiple Compound Needs indicates that there were 704 people in contact with services who were experiencing homelessness with 2 or more other compounding needs (mental health needs, substance use, experience of domestic violence, history of offending). People in this cohort are at significant risk of experiencing rough sleeping. This has informed the third priority area in the strategy 'Improve joined-up support with our partners to people who most need help'.

3.13 Our focus on prevention means that tackling homelessness in children, families and young people is central to delivering a long-term, positive step change. We also want to ensure that the challenges facing children, families, and young people experiencing homelessness are explicitly addressed. In developing the strategy, we listened to feedback from our partners and other stakeholders and have included a dedicated chapter. Our first 3 priorities provide the framework for the fourth - focused action to address homelessness in children, families and young people.

3.14 The draft strategy makes 3 commitments to underpin delivery of the strategy – to fairness and inclusion, to partnership working, and to make best use of resources.

3.15 The unequal impact of homelessness on some groups and individuals is striking. Our attention has been drawn to factors such as age, sex, ethnicity, sexuality, gender identity, disability and more. What is equally striking is that, while these factors can help us understand risk, none of them alone can help us predict who is likely to become homeless or the impact of homelessness on their lives. To make a difference we will work to understand how these and other characteristics interact in different contexts to develop fair and inclusive interventions and services that take into account the diversity of experiences and needs, and challenge stigma and exclusion.

3.16 Partners in the public, voluntary, community and social enterprise sectors make a major contribution, alongside the council, in tackling homelessness in the city. However, many of the factors that cause homelessness are beyond our direct control. Homelessness is rooted in structural inequalities and system wide challenges. Unemployment, disability, physical ill health, mental health needs, substance use, domestic abuse, and family breakdown create pathways into homelessness for many. The current cost of living crisis has intensified these pressures, meaning that even those in work can struggle.

3.17 The broader determinants of homelessness require comprehensive, coordinated responses that span multiple partners and levels of intervention. Sustainable progress will also depend on addressing the underlying causes of homelessness through a broader strategic lens. This includes actions set out in the council plan, housing strategy, the city plan, economic development strategy, health and wellbeing strategy and more. To achieve real change, we will need to collaborate with government, and with regional and local partners including other local authorities, the incoming regional Mayor, businesses, further and higher education sector and, critically, with people with lived experience of homelessness.

3.18 The cost of homelessness to the council and to our partners in the public and voluntary sectors is not sustainable, with rising prices and increasing demand. We also anticipate a significant reduction in government grant funding over the life of the strategy due to changes in the national funding formula. To deliver the strategy with its planned shift to prevention, it must be financially sustainable in the short and medium term to deliver the necessary long-term benefits.

3.19 Our challenging financial position, and that of our partners, means that we must think creatively about how we make best use of our resources, integrate services and develop innovative solutions. We need to invest in our collective workforce to ensure that they have the skills and knowledge that are required. We also need to make best use of our buildings and other physical assets across the city and develop a plan to ensure these are used to greatest effect. We will continue to develop our joint commissioning arrangements to ensure integrated, multi-agency, wrap-around support for people experiencing homelessness.

3.20 The *Homelessness code of guidance for local authorities* states that housing authorities should develop effective action plans, to help ensure that the objectives set out in the homelessness strategy are achieved. There is an expectation that plans are developed and owned with partners who will be jointly responsible for delivery. Any specific actions expected to be taken by another body or organisation cannot be included in an action plan without their approval.

3.21 Our approach to delivery follows principles set out in the council's learning framework. As a connected council we will work with our partners to put in place governance arrangements to ensure oversight and delivery of the strategy. Following agreement of the strategy we will work with our partners to develop, agree and implement a detailed action plan. This will include targets, milestones and arrangements for monitoring and evaluation. We will report on progress and update the action plan annually.

3.22 The strategy builds on our homelessness and rough sleeping strategy 2020 to 2025. Since that was agreed, our housing needs services have been remodeled, with prevention outcomes now consistently outperforming other councils in the region. We have revised our Housing Allocations Policy to ensure that people who have experienced homelessness can remain on the

housing register after moving into private rented housing. We have also set up a tenancy sustainment service to help prevent repeat homelessness.

3.23 Working with our valued partners in the voluntary sector we have offered advice and support, including outreach services, day centre provision and supported housing. With social care and the NHS, we have developed pathways for the most vulnerable, including rough sleepers, 16–17-year-olds, care leavers, refugees, and people with multiple compound needs.

3.24 In 2021, with cross party support, Brighton & Hove became the first UK local authority to sign the Homeless Bill of Rights. This was a core commitment in the last strategy, reinforcing our determination to uphold the rights of people experiencing homelessness.

4. Analysis and consideration of alternative options

4.1 The development of a homelessness and rough sleeping strategy at least every 5 years is a legal duty for the council as the local housing authority. We have based the strategy on the council's vision and core priorities. It has been tested and refined through engagement and consultation with our partners and other stakeholders. The final strategy reflects their feedback.

4.2 The council's vision is for a better Brighton & Hove for all. Homes for everyone is central to that vision. Tackling homelessness and rough sleeping will help us make Brighton & Hove a city to be proud of, a healthy, fair and inclusive city where everyone thrives.

4.3 Our housing strategy *Homes for Everyone*, sets out our priorities for housing in the city. These are to improve housing quality, safety and sustainability; to deliver the homes our city needs; to promote improved health and wellbeing for all; to provide resident focused housing services; and to prevent homelessness and meet housing need.

4.4 Our proposed priorities for the homelessness and rough sleeping strategy 2025 to 2030 build on our vision and priorities. They are to:

1. Increase our effectiveness in preventing homelessness and rough sleeping.
2. Improve temporary accommodation pathways and experiences.
3. Improve joined-up support with our partners for people who most need help.
4. Tackle homelessness in children, families and young people.

4.5 To ensure accountability and monitor progress, we will report regularly using performance indicators for each priority.

4.6 Our primary goal is to prevent homelessness. If someone becomes homeless, then their experience of homelessness should be brief, and it should not recur. If we are successful, then fewer people of all ages will experience homelessness and rough sleeping.

4.7 As well as a reduction in the overall number of people placed in temporary accommodation, people's experience of temporary accommodation will be improved. All households experiencing homelessness, whatever their needs, will be supported to move on into suitable housing.

4.8 By integrating our services, we will ensure that the people who are most vulnerable will receive the help they need. Our focus on support for rough sleepers and those with high level or compounding needs will mean improved outcomes for these groups.

4.9 A new national homelessness strategy was announced by the incoming government in 2024. At the point of writing this report, the national strategy has not been published and there is no indication when this will happen. When a national strategy is published, our local strategy and delivery plan may need to be refreshed and updated.

5. Community engagement and consultation

5.1 The statutory *Homelessness code of guidance for local authorities* sets out how a review of homelessness and strategy development should be undertaken. Section 2.10 of the guidance states that that 'Housing authorities must consult public or local authorities, voluntary organisations or other persons as they consider appropriate before adopting or modifying a homelessness strategy. Housing authorities will also wish to consult with service users and specialist agencies that provide support to homeless people in the district.'

5.2 Using the council's Community Engagement Framework to guide our approach, we began engagement with partners and other stakeholders in December 2024 with a call for evidence to inform our review of homelessness in the city. We established a project steering group with representatives from housing, children's services, health and adult social care, public health, the voluntary, community and social enterprise sector (the Homelessness & Rough Sleeping Network) and lived experience (Common Ambition).

5.3 We held a number of stakeholder engagement events and attended relevant network meetings between January and March 2025. With the support of Common Ambition and Justlife, people with lived experience of homelessness presented evidence and took part in this process. We also held briefings for members of the council. The cabinet member for housing and the cabinet advisor for homelessness were involved and briefed throughout the process.

5.4 Engagement with our partners and with people with lived experience continued over the summer to help us develop and refine the draft strategy. We organised dedicated sessions for key stakeholder groups including NHS commissioners and providers, voluntary, community and social enterprise sector leaders and frontline workers and others. During this time the project team also engaged with council corporate, directorate and senior leadership to ensure support for proposals.

5.5 We launched a formal public consultation on 8 September, running to 26 October 2025. The draft strategy and supporting documents, including the review of homelessness and an Easy Read guide to the strategy were published on Your Voice, the council consultation website. An accessible version of the draft strategy was also published on the main council website. The consultation was promoted using the council's communications channels, including social media, through our partner networks including Community Works, Homelessness and Rough Sleeping Network and equalities mailing lists. During the consultation we also reached out to refugee and migrant networks and older people's organisations based on lower response rates for these demographics.

5.6 Members of the public and other stakeholders were able to respond to the consultation in several different ways. An online survey could be completed on Your Voice. Printable copies of the survey could be downloaded or sent to people on request. An Easy Read version of the survey was also available. Through Common Ambition and other local voluntary sector organisations we provided support for people with lived experience of homelessness to complete surveys or to contribute through group discussions. We also presented the draft strategy at the Health and Wellbeing Board, People Overview and Scrutiny Committee as well as a other meetings and events including organising two public consultation events and a consultation roadshow at different venues across the city.

5.7 At the close of the public consultation we received 154 responses, of which 132 were from individuals and 22 were from groups or organisations.

5.8 The key themes arising in the public consultation were:

- prevention and early intervention;
- temporary accommodation;
- specific vulnerable groups;
- service design and delivery;
- resources and capacity;
- data, evidence and monitoring;
- housing supply and affordability;
- root causes of homelessness and systemic issues;
- and comment on wording, structure and specific actions.

5.9 Key changes to the strategy made following consultation include an amendment to the wording of priority 3 from 'Provide' to 'Improve', to acknowledge the need for greater collaboration and integration. We have also emphasised the commitment to partnership throughout. Other changes include strengthening the statement of vision and priorities, recognising the distinct needs of young people, being clearer about the connection to other strategic priorities for the council and its partners, for example, the delivery of more affordable housing.

5.10 We have included an additional action to better address standards in interim temporary accommodation. The wording of other some other actions has also been amended to address points raised by consultees. We have made

explicit reference to the needs of older people, and gypsies, Roma and travellers. The financial position of the council and its partners and the need to innovate to address new challenges has been re-emphasised. As requested by consultees, we have added a glossary of terms.

5.11 An engagement and consultation report can be found at Appendix 3. This sets out the themes arising from feedback on the consultation draft in more detail and how this feedback has informed the final draft of the strategy.

6. Financial implications

6.1 The financial appraisal of the strategy reveals significant and increasing risks associated with a finite budget resource and potentially reducing government grants. The strategy prioritises prevention and early intervention, as these represent the most cost-effective approaches. However, persistent pressures on temporary accommodation, including rising unit costs, limited supply, and extended stays, continue to drive up expenditure and put a strain on the Council's finances.

6.2 The Council's core budget in 2025/26 totals £7.9m. The external grants for this service include the Ministry of Housing, Communities and Local Government (MHCLG) Homelessness Prevention Grant (HPG) and Rough Sleeping Prevention and Recovery Grant (RSPARG) which are subject to change. Notably, following a formal consultation on the HPG funding formula for 2026/27, Brighton & Hove City Council faces a potential reduction of approximately 45%, falling from £10.9 million in 2025/26 to £6.0 million in 2026/27. Although transitional arrangements may partially cushion the impact, the reduction in grant income across the Medium Term Financial Plan will still be considerable.

6.3 RSPARG allocations for 2025/26 are currently stable, but there is no confirmed funding for 2026/27. New initiatives, such as a 'No First Night Out' model, would require decommissioning existing services or reallocating funds, as no new grant funding is expected. This poses a major financial risk.

6.4 Charitable and NHS contributions are also under financial pressure, which may further limit support and compound strain on Council services.

6.5 Short-term cost pressures impede progress towards prevention strategies, and reliance on expensive spot purchasing for temporary accommodation increases costs. Difficulties in moving individuals out of temporary accommodation result in further financial burdens.

Name of finance officer consulted: Sophie Warburton Date consulted: 20/11/2025

7. Legal implications

7.1 This is a very detailed report which sets out the legal requirements and so we do not propose to refresh these save to confirm that this is a legal

requirement. There are detailed considerations as to the equalities duties (public sector and others under the Equalities Act). The report has been prepared in line with the legal requirements including the duty to consult and the duty to consider equalities issues. There is no further legal comment.

Name of lawyer consulted: Simon Court Date consulted: 17 November 2025

8. Risk implications

8.1 The most significant risk is a failure to shift the balance between relieving homelessness and preventing homelessness. The strategy aims to improve outcomes and reduce the financial pressure on the council and its partners by focusing on prevention and reducing the flow into temporary accommodation. Outcomes for those experiencing homelessness can be improved by successful move on into settled accommodation. Achieving this shift is particularly challenging given increasing demand, increasing complexity of need, reducing resources and limited supply of move on options. A key mitigation in the strategy is to move prevention activity 'upstream', identifying those at risk of becoming homeless as early as possible and offering them advice and support.

8.2 The second key risk is a failure to improve temporary accommodation and thus outcomes for those living in temporary accommodation, especially for children and young people but also for other vulnerable people. Ensuring that there are adequate resources to do this, while managing demand and cost pressures, requires mitigation through financial and demand management, market development and measures such as dynamic purchasing as set out in the strategy.

8.3 A third key risk is failure to develop system wide, wrap around support for those in greatest need. Improving outcomes for people experiencing rough sleeping, those with mental health needs, disabilities, with substance use issues or fleeing domestic abuse depends on effective partnership working and coordination of resources across the system. There are a number of mitigations in the strategy, including a commitment to greater service integration and co-location and building on models of good practice such as the Changing Futures 'team around me' approach.

9. Equalities implications

9.1 Initial equality analysis was carried out for the review of homelessness at Appendix 2. This also informed the final Equality Impact Assessment (EIA) which can be found at Appendix 3.

9.2 The strategy has been developed with the input of people with lived experience of homelessness and other intersecting characteristics (as defined in the council's equalities framework). They have contributed evidence, robust challenge and constructive suggestions on how the strategy can help the council meet its Public Sector Equality Duty.

9.3 The EIA concludes that if the goals of the strategy are met, this is likely to have a positive impact on people with protected and other characteristics, including intersecting characteristics as set out in the council's Equalities Toolkit. The EIA makes 26 recommendations which have been taken into account in drafting the final strategy or which are material considerations in its delivery.

10. Sustainability implications

10.1 There are no immediate sustainability implications arising from this report.

11. Health and wellbeing implications

11.1 Poor health and disability can be both a cause and consequence of homelessness. Data and evidence on health and homelessness in the city is included in the review of homelessness at Appendix 2 together with summary information on healthcare services for people experiencing homelessness in the city. There is evidence from local Health Counts data and national research that living in temporary accommodation has a negative impact on both physical and mental health. People with multiple compound needs have significant health and care needs.

11.2 The strategy has had input from Public Health colleagues and draws on a public health approach with its focus on upstream prevention, service integration and tackling the root causes of homelessness. Other measures include drawing on evidence of effectiveness; the use of data to identify risk, drive service improvement and support innovation; supporting delivery by developing our workforce, creating clear referral pathways and providing guidance and policy support; and supporting learning by building in evaluation and creating rapid learning loops in our interventions.

Other Implications

12. Procurement implications

12.1 There are no immediate procurement implications arising from this report. Specific measure set out in the strategy, such as the recommissioning of outreach services will require procurement and social value advice as they are taken forward.

13. Crime & disorder implications:

13.1 The review of homelessness and draft strategy identify domestic abuse as a key cause of homelessness. Under the Domestic Abuse Act 2021 the council is required to set out its plans for accommodation for survivors of domestic abuse. It last did this in the Pan-Sussex Strategy for Domestic Abuse Accommodation and Support 2021-2024. The strategy was developed in partnership with the Sussex Police and Crime Commissioner, West Sussex County Council, East Sussex County Council.

13.2 Homelessness and rough sleeping are sometimes associated with begging and other forms of anti-social behaviour. While the strategy does not explicitly address these issues (as more appropriately matters for the Community Safety and Crime Reduction Strategy), it does make a commitment to challenge stigma, build trust and promote community integration and social connections. This is likely to have a positive impact on crime, disorder and community cohesion.

14. Conclusion

14.1 The council is required by law to review homelessness in its area and to agree a homelessness strategy based on that review every 5 years. The draft homelessness and rough sleeping strategy 2025 to 2030 sets out the council's priorities and approach for the next 5 years. The cabinet is asked to approve the strategy at Appendix 1.

Supporting Documentation

Appendices

1. Draft homelessness and rough sleeping strategy 2025 to 2030
2. Review of homelessness in Brighton & Hove 2025
3. Engagement and consultation report
4. Equality Impact Assessment

Homelessness and rough sleeping strategy 2025 to 2030

Brighton & Hove City Council

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Foreword

In July 2023, we set out a vision for a better Brighton & Hove for all - a city we can all be proud of, somewhere that is fair and inclusive and a healthy place where people can thrive. Accessible, affordable and high-quality homes for everyone is central to delivering that vision. Sadly, not everyone in the city enjoys the benefits of a settled home, with 1 in 77 people experiencing homelessness, including around 1,400 children. We are working tirelessly to change that.

This strategy builds on our homelessness and rough sleeping strategy 2020 to 2025. Since that was agreed, our housing needs services have been remodelled, with prevention outcomes now consistently outperforming other councils in the region. We have revised our Housing Allocations Policy to ensure that people who have experienced homelessness can remain on the housing register after moving into private rented housing. We have also set up a tenancy sustainment service to help prevent repeat homelessness.

We have worked with our valued partners in the voluntary sector to offer advice and support, including outreach services, day centre provision and supported housing. With social care and the NHS, we have developed pathways for the most vulnerable, including rough sleepers, 16–17-year-olds, care leavers, refugees, and people with multiple compound needs. In 2021, with cross party support, Brighton & Hove became the first UK council to sign the Homeless Bill of Rights. This was a core commitment in the last strategy, reinforcing our determination to uphold the rights of people experiencing homelessness.

Housing is a fundamental human right. Homelessness can happen to anyone, but it disproportionately affects people who are already vulnerable: those who can't afford to pay the rent, people fleeing violence and abuse, and those evicted by their landlord or asked to leave by family or friends. The consequences can be devastating.

Our overarching priority therefore is to stop people becoming homeless in the first place. The council and many other organisations can provide information, advice and support to help people stay put or to find alternative accommodation. They can also help prevent people from sleeping rough by intervening early and offering practical assistance.

If people do become homeless, the council can help them find a settled home, and in some cases offer temporary accommodation. However, too many people are spending too long in temporary accommodation, sometimes accommodation of a poorer quality. This is unacceptable and unsustainable. Our second priority, therefore, is to ensure that there is sufficient good quality temporary accommodation available; to support people while they are there; and to help them move on as quickly as possible.

Some people are more vulnerable when they become homeless or are more likely to sleep rough. This includes people fleeing domestic abuse, people with mental health needs,

substance use issues, or a history of offending. Our third priority is to work with our partners to provide joined-up support for people who most need our help.

Not only are children and young people more vulnerable when they become homeless, they are hugely over-represented in the city's homeless population. Approximately 2 in every 5 people experiencing homelessness in Brighton & Hove are under 18. This is unacceptable and we will give them the priority they deserve. We have chosen to place a special focus in this strategy on tackling homelessness in children, families and young people.

Our partners and people with lived experience of homelessness have helped shape this new strategy. We have developed and refined the priorities and commitments together. We will continue to work together to deliver our shared ambitions.

Councillor Gill Williams: Cabinet Member for Housing, Brighton & Hove City Council

Councillor Paul Nann: Cabinet Advisor - Homelessness, Brighton & Hove City Council

Introduction

Under the Homelessness Act (2002) all housing authorities must have a homelessness strategy based on a review of all forms of homelessness in their district. The strategy must be renewed every 5 years. This strategy sets out the council's plans for preventing and reducing homelessness and for ensuring that sufficient accommodation and support are available for people who are at risk or those who become homeless.

We are facing unprecedented challenges. There are specific duties that the council, as the local housing authority, must comply with. Demand for our services continues to rise however, with more people, including people with higher levels of need, approaching us for help. With this additional pressure and with rising costs, the council is spending too much on temporary accommodation. This means that we have fewer resources available for prevention and support services. We also anticipate a significant reduction in government funding over the life of the strategy. All this means that we must do things differently. To deliver our strategy it must be financially sustainable.

Preventing and alleviating homelessness are legal duties for the council. We will continue to meet our legal responsibilities and to deliver and improve our services. We will do everything we can to make sure that people are treated fairly and with respect when they approach us for help, whatever their housing situation. Everyone deserves our support, but we will prioritise those with greatest need and the most vulnerable. This includes providing support to access appropriate housing and to maintain independence and dignity.

Homelessness is rooted in structural inequalities and system wide challenges. Unemployment, disability, ill health, mental health needs, substance use, domestic abuse, and family breakdown create pathways into homelessness for many. The current cost of living crisis has intensified these pressures, while a chronic shortage of genuinely affordable housing means that even those in work can struggle.

The structural determinants of homelessness require comprehensive, coordinated responses that span multiple policy areas and levels of government. This draft strategy focuses on prevention and early intervention, temporary accommodation, and support for those in greatest need. We recognise that sustainable progress also depends on addressing the underlying causes of homelessness through a broader strategic lens. This includes the council plan *A Better Brighton & Hove for All,* with its focus on creating a city we can all be proud of, a fair and inclusive city that helps people to thrive.

As well as preventing homelessness and meeting housing need, *Homes for Everyone,* our housing strategy 2024 to 2025 sets out plans to improve housing quality, safety and sustainability, to deliver the homes the city needs, promote healthy housing and provide resident focused housing services. The overarching planning framework and targets for housing and infrastructure, including affordable and specialist homes can be found in the City Plan. Other key plans and strategies include the economic development strategy, joint health and wellbeing strategy, and more.

While many determinants of homelessness lie beyond our direct control, we will use our voice to advocate for policy change at regional and national levels. This includes pressing for increased investment in social housing, reforms to the welfare system, improved discharge planning from institutions, and better funding for mental health and substance use services. We will work with our local partners, the new Mayor for Sussex and Brighton, neighbouring local authorities, the Local Government Association, and other networks to amplify the case for addressing the root causes of homelessness.

As we developed our priorities we asked for input from people with lived experience of homelessness, frontline service providers and other partners. We also consulted publicly on a draft strategy. The priorities and areas for improvement that we have agreed are based on this engagement and consultation and on the data and evidence from our review of homelessness.

There was strong support for the principle of early identification and support to prevent homelessness. There was also an acknowledgement of the challenges we face. We need to shift resources to prevent homelessness, but we also need to ensure that those who are currently homeless receive the support they need.

The focus on temporary accommodation was also endorsed. We have put forward priorities and actions that we think will make the most difference including driving up standards in interim placements, an area of concern for many.

Our goal of improving and joining up services for those who most need help attracted many people's support. They told us that mental health, physical health and substance use needs should be addressed alongside housing needs to make the most difference. The widespread experience and impact of trauma was also emphasised by many. Domestic abuse and support for refugees and asylum seekers were areas of particular concern. The strategy contains measure that we believe will support progress in these areas. Work to integrate services is already underway.

We have chosen to give a particular focus to tackling homelessness in children, families and young people. This emphasis was strongly supported in the public consultation feedback. We acknowledge that this is a broad group with diverse needs and experiences. In delivering the strategy we will need to address the needs of children living with their family, of children separated from their family, and also of young people both within and outside families. If we can reduce the impact of homelessness on children and young people, we will have made a significant difference to their lives and to achieving the vision of a better Brighton & Hove for all.

This strategy should also be read alongside other plans and strategies to address need and vulnerability. In delivering the strategy we will develop our interventions in line with the cost-of-living plan, drugs and alcohol strategy, autism and learning disability strategies, mental health housing action plan, suicide prevention strategy, domestic abuse accommodation strategy, transition to adulthood strategy and others.

In 2024, the incoming government announced that they would begin work on a cross-government, national homelessness strategy. We anticipate that this will be published in the coming months and will have a strong focus on prevention. As we begin implementation of our local strategy, we will take national priorities into account in our delivery plans.

What our review of homelessness in the city tells us

Our *Review of homelessness in Brighton & Hove 2025* sets out the detailed data and evidence that inform this strategy. Key facts and figures from the review can be found below.

Analysis by Shelter indicated that there were 3,580 people experiencing homelessness at the end of June 2024 in Brighton & Hove. Most (3,528) were living in temporary accommodation and a further 52 were sleeping rough. There were 1,411 homeless children aged 0-17 in the city, almost 40% of the total homeless population.

- 3,580 people in Brighton & Hove experiencing homelessness June 2024
- 1,411 children experiencing homelessness June 2024
- 52 people sleeping rough June 2024

Homeless applications have been rising since 2021. In 2024, 2,624 households approached the council for help either because they were at risk of homelessness or because they were homeless. Of these 2,366 made a homeless application. If people approach us before they become homeless, we can often help them stay in their home or find an alternative. 594 households approached the council for help before they became homeless in 2024. The number of households approaching the council after they had already become homeless rose from 993 in 2021 to 1,230 in 2024.

- 2,624 household approached council for homelessness advice and support in 2024
- 2,366 homeless applications in 2024
- 594 households approached the council before they became homeless in 2024
- 1,230 households approached the council after they had become homeless in 2024

There are many reasons why someone can be threatened with homelessness or become homeless. The four most common reasons in Brighton & Hove are the end of a private rented tenancy; family or friends no longer willing to accommodate; fleeing domestic violence; and eviction from supported housing.

- End of private rented tenancy main reason for 58% of those owed a prevention duty
- Family or friends no longer willing to accommodate main reason for 24% of those owed a relief duty

If homelessness cannot be prevented the council may have an on-going duty to help someone to find a settled home if they are eligible, have a priority need and other tests are met. This is called the main housing duty. Households accepted as owed a duty under the

main housing duty have more than doubled over the last 5 years with 616 acceptances in 2024 compared to 261 in 2020.

- 616 main housing duty acceptances in 2024

While people's homeless applications are being processed or while they are waiting to be rehoused, they may be placed in temporary accommodation. Temporary accommodation can include private rented housing, council owned properties, hostels and refuges as well as Houses in Multiple Occupation, B&Bs or hotels. After falling between 2020 and 2022, the use of temporary accommodation by the council has again risen, with 1,928 households living in temporary accommodation at the end of 2024.

- 1,928 households in temporary accommodation December 2024

Almost half (47%) of households in temporary accommodation at the end of December 2024 contained children. 21% of households in temporary accommodation consist of a single female with children.

- 47% of households in temporary accommodation have children
- 21% of households in temporary accommodation single female + children

A third of households in temporary accommodation at the end of December 2024 consisted of single people.

- 22% of households in temporary accommodation single male no children
- 11% of households in temporary accommodation single female no children

There is an acute shortage of social and private rented sector accommodation in the city. For those waiting for social housing, the average waiting time is 3.3 years. If a household needs a larger home, the average wait for a 3 bedroom social rented property is 6.2 years.

- 3.3 years - average wait for socially rented home
- 6.2 years – average wait for 3-bedroom socially rented home

Almost a third of homes in the city are privately rented. This is much higher than the regional or England averages. The cost of renting in the private sector in the city is high, with a private renter on an average income expected to spend around 45% of their income on rent. This is much higher than the 'affordability threshold' of 30% of household income.

- 31% of homes in the city are privately rented (South East 17%; England 18%)
- A private renter on an average income in Brighton & Hove can expect to spend 45% of their household income on rent. The 'affordability threshold' is 30%.

Most people approaching the council when they are already homeless have at least one support need. The 4 most common support needs are a history of mental health problems, physical ill health and disability, drug dependency needs and experience of domestic abuse.

- 68% of main applicants owed a relief duty have 1+ support needs
- 35% of main applicants owed a relief duty have a history of mental health needs

Many people experiencing homelessness have more than one support need. In early 2025 there were 704 people in contact with homelessness services who were experiencing homelessness and had 2 or more other compounding needs, including mental health needs, substance use, experiencing domestic abuse, and a history of offending. People in this group are at much higher risk of experiencing rough sleeping.

- 704 people experiencing homelessness with 2+ compounding needs

The 2025/2026 budget for Housing People Services was £31.4 million. This includes the £28 million cost of providing temporary accommodation. Achieving the desired shift to prevention is particularly challenging in a context where increased demand and rising costs are absorbing more resources. Financial resources available are also expected to reduce over the life of the strategy.

- Council homelessness services £31.4 million in 2025/26 budget, of which £28 million for temporary accommodation

Our partners in the voluntary, community and social enterprise sector make a huge contribution to tackling homelessness in the city. The 2021 *Working Together* report estimated that the value of services provided by the sector in the city was well over £10 million.

- 110 voluntary, community and social enterprise organisations offering 204 specialist and support services
- 2,220 volunteer hours per week
- Voluntary, community and social enterprise sector estimated added value £10+ million

The NHS offers healthcare to people experiencing homelessness through universal services such as GPs, A&E and other primary and secondary care services. They also provide specialist healthcare services to some of the most vulnerable people experiencing homelessness.

- Specialist homeless healthcare services £3.3 million

Our vision and priorities

The council's vision is for a better Brighton & Hove for all. A home for everyone is central to that vision. Tackling homelessness and rough sleeping will help us make Brighton & Hove a city to be proud of, a healthy, fair and inclusive city where everyone thrives.

Our housing strategy *Homes for Everyone*, sets out our priorities for housing in the city. These are to improve housing quality, safety and sustainability; to deliver the homes our city needs; to promote improved health and wellbeing for all; to provide resident focused housing services; and to prevent homelessness and meet housing need.

Our primary goal is to prevent homelessness. If someone becomes homeless, then their experience of homelessness should be brief, and it should not recur. If we are successful, then fewer people of all ages will experience homelessness and rough sleeping.

As well as a reduction in the overall number of people placed in temporary accommodation, people's experience of temporary accommodation will be improved. All households experiencing homelessness, whatever their needs, will be supported to move on into suitable housing.

By integrating our services, we will ensure that the people who are most vulnerable will receive the help they need. Our focus on support for people experiencing rough sleeping and those with high level or compounding needs will lead to improved outcomes.

Our priorities for the homelessness and rough sleeping strategy 2025 to 2030 build on our vision and housing priorities. They are to:

1. Increase our effectiveness in preventing homelessness and rough sleeping
2. Improve temporary accommodation pathways and experiences
3. Improve joined-up support with our partners for people who most need help
4. Tackle homelessness in children, families and young people.

To ensure accountability and monitor progress we will report regularly using performance indicators for each priority.

Priority 1: Increase our effectiveness in preventing homelessness and rough sleeping

Why this is important

Prevention is central to our strategy because it offers the best outcomes for individuals while making the most effective use of our resources. Homelessness can create lasting trauma, disrupt employment and education, and damage physical and mental health in ways that become increasingly difficult and expensive to address. By working with our partners, sharing information and using digital technologies we can get better at identifying who might be at risk and offer support before they reach crisis point.

Helping people to stay in their home prevents the trauma and cost of homelessness while preserving social connections and stability. Proactive landlord engagement, financial advice and support, and mediation services are some of the most cost-effective interventions we can make. For those who need to leave their home, where attempts to stay have been unsuccessful or because it is unsuitable or unsafe, then support to find a new home is usually a better option than temporary accommodation.

Preventing rough sleeping is critical because rough sleeping carries the greatest risk of harm and typically requires the most intensive interventions once people are on the streets. Single people, those leaving institutions, people with very high support needs, and people with multiple compound needs are more likely to sleep rough. Targeted early intervention can break this cycle and prevent the deterioration in physical and mental health that makes future housing solutions more difficult to achieve.

What we will do

1.1 Early identification of risk and early intervention

- Develop a homelessness risk model using data from a range of sources to identify and target support to people at greatest risk of becoming homeless before they reach crisis point.
- Work with universal public services including health services, jobcentres, education and training providers, and foodbanks to identify and support those at risk of homelessness as early as possible.

1.2 Support people to stay in their homes or to find a new home

- Develop integrated tenancy sustainment services, bringing together housing, employment and skills, and financial inclusion partners to deliver coordinated support packages including income maximisation, debt advice, financial literacy training, and flexible crisis prevention funding.
- Improve access to alternative accommodation in the private and socially rented sectors for those who need to find a new home.

- Work with community, voluntary and faith organisations to develop targeted, culturally appropriate information and advice for people from Black and Racially Minoritised communities, including people seeking asylum and refugees, so they can access the support they need.

1.3 Targeted prevention for people at risk of rough sleeping

- Develop a financially sustainable 'no first night out' model to identify and support those who are known to services, including people in temporary or supported accommodation or leaving institutional or care settings, who are at greatest risk of going on to sleep rough.

How we will measure progress

We will track our progress using the following indicators:

- Number of Duty to Refer referrals
- % presenting at prevention duty stage
- % of duties owed where homelessness was prevented
- % of households placed in temporary accommodation
- Number of people sleeping rough on a single night

Priority 2: Improve temporary accommodation pathways and experiences

Why this is important

The number of households living in temporary accommodation has risen to unprecedented levels. Temporary accommodation is expensive, with costs rising over time. This impacts our ability to invest more in prevention. More importantly, it is insecure and may be unsuitable for people's specific needs long-term.

Too many people are spending too long in temporary accommodation. Children aged 0-17 make up around 40% of the city's homeless population, with most of them living in households in temporary accommodation. Extended stays in temporary accommodation can have a negative impact on children's educational attainment, social development, and mental health. For adults, the experience can worsen existing vulnerabilities and make it harder to find solutions and routes into settled accommodation. Living in temporary accommodation can disrupt support networks and community connections, especially where people are placed outside the city.

We recognise that while we need to prevent homelessness from occurring, we must also ensure that when people do need temporary accommodation, their experience is as positive as possible and that they move on to settled housing quickly. We want to reduce the overall numbers in temporary accommodation through effective prevention, improve the quality of the temporary accommodation that is available and reduce the length of time people spend in temporary accommodation through better pathways to settled housing.

Increasing the supply of good quality temporary accommodation reduces our dependence on more expensive forms of accommodation. Having an adequate supply also means we can better match households to appropriate accommodation types, ensuring people have suitable facilities and space. Finally, having sufficient supply reduces the pressure to place households out of area, helping them maintain their community connections and support networks.

What we will do

2.1 Improve move on from temporary accommodation into settled housing

- Reduce our overall use of temporary accommodation by working with our supported and social housing partners to develop bespoke pathways into settled housing.
- Develop intensive, personalised move-on support to households in temporary accommodation, including assessment of barriers to move on, practical assistance with housing applications, financial support for deposits and removals, and tenancy sustainment support once in permanent housing.

2.2 Support people living in temporary accommodation

- Explore floating support services for people living in temporary accommodation to help them maintain community connections and social support networks and develop the skills and confidence needed for move on.
- Undertake a comprehensive needs assessment to better understand the needs and support requirements of households in temporary accommodation and inform service improvements.

2.3 Improve the supply and quality of temporary accommodation

- Put in place a recovery plan to address the short- and medium-term impact of rising temporary accommodation costs, a changing private rented sector market and expected loss of grant funding.
- Develop a comprehensive temporary accommodation acquisitions strategy to increase supply, raise standards and achieve long-term financial sustainability by retendering block booking contracts, introducing dynamic purchasing and reducing the use of spot purchasing.
- Develop and publish contractual standards for interim accommodation.
- Strengthen accommodation supply by developing additional provision in partnership with private and social landlords and the voluntary, community and social enterprise sector.

How we will measure progress

We will track our progress using the following indicators:

- Total number of people in temporary accommodation
- Average length of stay in temporary accommodation
- % of temporary accommodation spot purchased
- Successful move-ons per quarter

Priority 3: Improve joined-up support with our partners for people who most need help

Why this is important

There is a high demand for support and services from people in urgent housing need, including those fleeing domestic violence, vulnerable families, refugees and asylum seekers, LGBTQ+ youth, people with mental health needs, neurodivergent people and others. These factors often interact to amplify need and vulnerability. Our services are seeing increasing numbers of people with significant, and often complex, needs. In responding to those needs we will tailor our services to ensure fair access to good quality, people centred, and trauma informed support.

People who experience three or more of the following are described as having multiple compound needs: homelessness, mental health needs, substance use, current or past offending and experience of domestic abuse. The term multiple compound needs attempts to capture the way these issues combine to impact someone's life. Addressing multiple compound needs is a priority for our Health and Care Partnership. Together, we aim to jointly commission and deliver wraparound services for people with multiple compound needs.

Our ambition is to end rough sleeping in the city. People who sleep rough have often experienced serious, sometimes multiple traumas in their lives. The experience of rough sleeping itself is traumatic. Women and young people are at greater risk of victimisation and physical and sexual violence when sleeping rough. As well as preventing rough sleeping where we can, we will work with our partners to review and improve our accommodation and support offer for people experiencing rough sleeping. This includes the development of our single homeless supported housing pathway, to better meet the needs of single people with high levels of need.

What we will do

3.1 Target support for people who are most vulnerable

- Establish multi-agency protocols for supporting priority groups including young people leaving care, 16–17-year-olds, pregnant people, families with children, survivors of domestic abuse refugees and asylum seekers, LGBTQ+ people and other vulnerable groups, ensuring coordinated assessment and support pathways.
- As required by the Supported Housing (Regulatory Oversight) Act 2023, develop a supported housing strategy and prepare for anticipated changes to supported housing standards.
- Improve housing options and pathways for survivors of domestic abuse, recognising their specific safety and support needs.

- Work with our partners to reduce health inequalities impacting people experiencing homelessness.

3.2 Create integrated services for people with multiple compound needs

- Improve the join up between the council's homelessness services and homeless healthcare services through a new Homeless and Multiple Compound Needs Partnership.
- Embed co-production approaches by working with people with lived experience to co-create innovative services, policies and practice improvements that reflect their expertise and priorities.
- Agree a care and support protocol for people with co-occurring mental health and substance use issues, which disproportionately affect people experiencing homelessness.
- Collaborate with our NHS and voluntary, community and social enterprise sector partners to take forward our shared ambition for a new integrated homeless healthcare hub.

3.3 Support people experiencing rough sleeping access services and accommodation

- Review and recommission our Housing First service to improve outcomes for residents and ensure a better distribution of Housing First tenancies across a range of housing stock.
- Provide enhanced support for those who return to rough sleeping, using data to track flow and target prevention work.
- Review and improve homeless day centre provision in the city to ensure that it meets a broader range of needs and is financially sustainable.
- Develop our housing offer and support services for those experiencing long term rough sleeping.
- Work with our partners to pilot a new multidisciplinary in-reach support approach to inform the development of the wider single homeless supported housing pathway.

How we will measure progress

We will track our progress using the following indicators:

- Households with accommodation secured at end of prevention/relief duty for households also experiencing at least two areas of overlapping disadvantage
- Number of households unable to be supported at domestic abuse safe accommodations due to being unable to meet additional needs.
- % of people with multiple compound needs achieving positive outcomes across at least 3 domains (housing, health, criminal justice, substance use) at 12 months
- Number of people sleeping rough over the month who are long term

Tackling homelessness in children, families and young people

Our focus on prevention means that tackling homelessness in children, families and young people is central to delivering a long-term, positive step change. We also want to ensure that the challenges facing children, families, and young people experiencing homelessness are explicitly addressed. In developing the strategy, we listened to feedback from our partners and other stakeholders and have included this dedicated chapter. Our 3 priorities provide the framework for focused action to address homelessness in children, families and young people. We acknowledge that this is a broad group with diverse needs and experiences. In delivering the strategy we will need to address the needs of children living with their family, children separated from their family, and also young people both within and outside families

Children (0-17) comprise around 17% of the population of Brighton & Hove but make up almost 40% of the city's homeless population. Most are part of families living in temporary accommodation. Families with children make up 42% of those seeking help from the council because they are at risk of homelessness, 19% of those owed a relief duty and 42% of those owed a main duty. National evidence tells us that outcomes for children living in temporary accommodation are significantly worse than for those in settled accommodation.

Young people aged 18-25 comprise 14% of the city's population but 20% of those experiencing homelessness. National and local data tell us that youth homelessness is increasing. Young people face distinct and often overlooked challenges that put them at greater risk of homelessness - from family breakdown, trauma and care experience, to lower pay, reduced benefit entitlements and limited access to safe housing. They are also more vulnerable if they do become homeless.

Priority 1: Increase our effectiveness in preventing homelessness and rough sleeping

- Increase early identification of children, families and young people at risk of homelessness through early help and universal services such as schools and Family Hubs.
- Improve the collection, sharing and use of data to better understand the needs of children, families and young people, target support and evaluate interventions.
- Develop our family intervention and mediation offer for young people.
- Deliver targeted prevention for young people at risk of rough sleeping, including emergency accommodation, outreach, advice and advocacy.

Priority 2: Improve temporary accommodation pathways and experiences

- Support children, families and young people maintain connections to services and support networks.
- Improve standards for children and families living in temporary accommodation.

- Minimise the use of B&B, other forms of non-self-contained accommodation and out-of-area placements for families with children.
- Support families with children and young people to move out of temporary accommodation into more secure tenancies.
- Develop tailored pathways for vulnerable young people that meet distinct needs and experiences.

Priority 3: Improve joined-up support with our partners to people who most need help

- Ensure that children, families and young people experiencing homelessness receive coordinated protection and support.
- Support care experienced young people and other vulnerable young people to sustain their tenancies.
- Strengthen our support offer for the most vulnerable children and young people through a 'team around me' model.

How we will measure progress

We will track progress using the following measures:

- Number of 16–24-year-olds owed a relief duty
- Number of households with children in temporary accommodation
- Number of children (0-17) in temporary accommodation
- Number of families in B&B over 6 weeks
- % of care leavers in suitable accommodation
- Number of people sleeping rough under 25 and care leaver

Our commitments

Fairness and inclusion are core values for the council. The first of our three commitments in this strategy is to be fair and inclusive in the way we design and deliver our services. We recognise the impact of trauma both as a cause and a consequence of homelessness. We will work to ensure that our services are holistic, person-centred and trauma informed. Some groups are over-represented amongst those experiencing homelessness, others are more vulnerable when they become homeless. Our delivery of the strategy will take this into account. We have a legal and moral responsibility to meet our public sector equality duty, and this will underpin our approach.

Our strategy is an ambitious, 5-year plan and is intended to contribute to delivering our long-term vision of a better Brighton & Hove for all with its goal of homes for everyone. We know that we can't do this on our own. To achieve real change, we need to work in partnership with people with lived experience of homelessness and with central government, regional and local partners including businesses, and the public and voluntary sectors.

We are in a situation where demand for support is increasing and where funding is reducing. We need to make the best use of the resources that we have. Our workforce is key to delivery. We need to ensure that they have the support, knowledge and skills to do their very best. We also need to manage our collective finances and assets effectively and share and use our data and evidence intelligently, targeting our interventions where they will have greatest impact.

To deliver our strategy, we commit to:

1. Be fair and inclusive
    a. Develop holistic, person-centred and trauma informed services
    b. Champion equality, diversity and inclusion
    c. Challenge stigma, build trust, and promote community integration and social connections

2. Work in partnership
    a. With people with lived experience to jointly design services and policy
    b. With government, regional and local partners to tackle the root causes of homelessness
    c. With the voluntary, community and social enterprise sector to identify additional resources and make full use of their knowledge and expertise

3. Make best use of our resources
    a. Ensure our workforce has the support, knowledge and skills to do their very best

b. Manage our collective financial resources and assets to ensure value for money and long-term financial health
c. Use data and information to better understand need, deliver evidence-based solutions and drive innovation

Delivering the strategy

The council is embedding a learning framework to support our journey to become a learning organisation. We will use this framework to underpin the delivery of our strategy.

Be connected

We are committed to work with our partners as equals, including people with lived experience, to design services and support for people at risk or who are experiencing homelessness. This means agreeing our plans together, reporting progress across different departments and organisations and ensuring shared accountability for delivery. We also recognise that our partnerships across the broader system will help us tackle the structural determinants of homelessness.

Together with our partners, we will put in place governance arrangements to ensure oversight and delivery of the strategy. As well as agreeing an annual action plan, more detail on delivery will be set out in our service and operational plans. We will work with our partners and with people with lived experience to develop these. We will report on progress and update the action plan annually.

Be confident

We face significant challenges. The cost of meeting our legal duty to provide temporary accommodation continues to rise rapidly. We allocated £28 million to meet the cost of temporary accommodation in 2025/26. It is likely that we will significantly overspend this by the end of the year. Due to a change in the funding formula for the Homelessness Prevention Grant we also expect that over the life of the strategy we will lose grant funding from central government.

All this means that we must do things differently. We know that we need to shift our approach to focus more on prevention and early intervention. Over the long term, we are confident that this will improve outcomes for people and reduce the cost of temporary accommodation to the council. In the short to medium term, however, we need to make some difficult decisions, including how and where we source our temporary accommodation.

Be innovative and creative

Our financial position means that we need to think creatively with our partners about how we pool resources, integrate services and develop innovative solutions. We need to invest in our collective workforce to ensure that they have the skills and knowledge that is needed. We also need to make best use of our buildings and other physical assets across the city and develop a plan to ensure these are used to greatest effect. We will continue to develop our joint commissioning arrangement to ensure integrated, multi-agency, wrap-around support to people experiencing homelessness.

Be diverse and inclusive

In reviewing homelessness and developing our priorities, the unequal impact of homelessness on some groups and individuals is striking. It is clear, for example, from our data that people from Black and racially minoritised groups are over-represented amongst those living in temporary accommodation. Our attention has been drawn to factors including age, sex, ethnicity, sexuality, gender identity, disability and more. What is equally striking is that while these factors can help us understand risk, none of them alone can help us predict who is likely to become homeless or the impact of homelessness on their lives. We have identified 3 groups where we need to do more work to understand need for services. These are people living in temporary accommodation, Gypsy, Roma, and traveller people, and people aged 55 and over at risk of or experiencing homelessness.

We also need to get better at understanding how characteristics interact in different contexts to develop interventions and services that recognise the diversity of experiences and needs, challenge stigma and promote inclusion. We believe that the best way to do this is by working in partnership with people with lived experience of homelessness.

Be healthy and psychologically safe

The impact of homelessness on health and wellbeing is clear from the evidence we have gathered. Poor health is also a factor that can contribute to someone becoming homeless. Changes in national policy including the Supported Housing Act and the Renters Rights Act give us more leverage to tackle poor housing conditions. We also plan to work with our providers to drive up standards in temporary accommodation.

The interaction between homelessness and mental health is one of the most significant issues that we have identified. Many individuals who become homeless have a history of traumatic experiences prior to losing their homes. These can include childhood abuse, neglect, domestic abuse, or significant life crises such as the death of a loved one or financial hardship. The trauma of homelessness compounds these earlier experiences. In delivering this strategy, we have committed to work in ways that are trauma informed and psychologically safe.

Glossary of terms

Asylum seeker: A person seeking protection from persecution in another country. See also ‘Migrant’ and ‘Refugee’.

Care leaver: A young person who has been in local authority care. Councils must support care leavers up to at least age 21, and sometimes to age 25. They are at increased risk of homelessness.

Co-production: People working in the system and those with experience of accessing the system working together, as equals, to deliver system change, service improvement and policy development and implementation.

Early intervention: Taking action as soon as possible to tackle problems before they worsen. In relation to homelessness, this means identifying and supporting people at risk before they lose their home.

Homelessness: Under UK law, a person is considered homeless if they have no accommodation that they are entitled to occupy, or they have accommodation but cannot reasonably be expected to continue occupying it. This includes situations where they have been evicted or asked to leave; where they cannot afford to pay rent or a mortgage and face eviction or repossession; where the accommodation is overcrowded, in poor condition, or unsuitable; where they face domestic abuse or harassment; or where they have been staying temporarily with friends or family but can no longer do so.

Homelessness prevention: Action taken to help someone keep their current home or find a new home before they become homeless. This can include help with rent arrears, mediation with family or landlords, financial advice, or assistance to find new accommodation. See also ‘Prevention duty’.

Housing First: An approach providing immediate access to independent, permanent housing with flexible support for people with complex needs. There is strong evidence of success with this approach for people experiencing rough sleeping long-term.

Interim accommodation: a form of temporary accommodation, often used to accommodate people owed a relief duty by the council while their homeless application is being processed. See also ‘Relief duty’ and ‘Temporary accommodation’.

Joint commissioning: When organisations work together to plan, fund and arrange services. In homelessness, this can involve councils working with health, social care and other partners to commission integrated support.

Lived experience: Direct personal knowledge and expertise from experiencing something yourself.

Main housing duty: The legal duty for a local authority to provide settled accommodation to someone who is homeless, eligible, has priority need, and whose homelessness was not caused by their own deliberate act or omission.

Migrant: Person who has moved from one country to another, with eligibility for services, including homelessness support dependent on immigration status. See also 'Asylum seeker' and 'Refugee'.

Move-on: The process of transitioning from temporary or supported accommodation, into settled housing. Good move-on options help reduce time spent in temporary or supported accommodation.

Multiple compound needs: When someone experiences several issues or needs at the same time that affect their ability to live independently. Our local definition is 3 or more of the following: experiencing homelessness, mental health challenges, substance use, experience of domestic violence, history of offending.

Out of area placements: When a local authority provides temporary accommodation outside its area, usually because of local shortages of suitable accommodation or for safety reasons.

Prevention duty: The legal duty for local authorities to take reasonable steps to help someone threatened with homelessness (within 56 days) keep their home or find another. Applies to all eligible applicants regardless of priority need.

Priority need: A legal category determining vulnerability. Includes households with dependent children, pregnant people, and people vulnerable due to age, mental illness, disability or other reasons. Affects what duties the council owes to people experiencing homelessness.

Private rented sector: Housing owned by private landlords and rented to tenants.

Relief duty: The legal duty for local authorities to take reasonable steps to help someone who is already homeless secure accommodation. Applies to all eligible applicants regardless of priority need. Lasts 56 days unless ended for specific legal reasons.

Refugee: Person with officially recognised refugee status who can access public funds and homelessness support. See also 'Asylum seeker' and 'Migrant'.

Rough sleeping: Sleeping outside or in places not designed for habitation, such as doorways, parks, cars or tents. The most visible form of homelessness, but most people experiencing homelessness are living in temporary accommodation, sofa surfing or other insecure or non-secure housing.

Settled accommodation: Housing that someone has a legal right to occupy for at least six months. Includes social housing, private rented tenancies, and owner-occupied housing. See also 'Temporary accommodation'.

Social housing: Housing provided by councils or housing associations at below market rent. Usually more secure and affordable than private rented accommodation. Access is allocated according to need, but supply is limited with long waiting lists.

Supported accommodation: Housing with additional support services to help people live independently. Support might include help with daily living skills, managing money, accessing health services, or addressing substance use. It can be a stage in moving towards settled accommodation or provided long-term according to needs.

Temporary accommodation: Short-term housing provided by local authorities to people experiencing homelessness while being assessed or while finding settled accommodation. Includes hostels, bed and breakfasts, and leased properties. Costs have increased significantly, creating unsustainable pressure on council budgets.

Trauma: Deeply distressing experiences that can overwhelm coping ability, often part of the history of people experiencing homelessness. The experience of homelessness itself can be traumatic.

Trauma-informed approach: Delivering services that recognise trauma's widespread impact and how it affects behaviour and wellbeing. Seeks to avoid re-traumatisation, emphasises safety and trust, and supports recovery and empowerment.

Voluntary, community and social enterprise sector: Not-for-profit organisations independent of government, including charities, community groups, and social enterprises. Play a vital role in homelessness services, often reaching people that statutory services struggle to engage.

Review of homelessness in Brighton & Hove 2025

Brighton & Hove City Council

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Introduction

Much has changed since the last review of homelessness in Brighton & Hove was undertaken in 2019, including the Covid-19 pandemic, a rapid rise in the cost-of-living, and a housing crisis that has intensified over time. In 2023 a new city council was elected which put 'homes for everyone' at the centre of its vision for a better Brighton & Hove for all.

Analysis by Shelter in 2024 indicated that homelessness affects around 1 in 77 people in Brighton & Hove (3,580 people or 1.3% of the city's population).[1] They estimated that at the end of June 2024 there were 3,528 people homeless and living in temporary accommodation and a further 52 people sleeping rough. They also estimated that there were 1,411 children experiencing homeless in the city: almost 40% of the total population experiencing homelessness. Most of these children were living in temporary accommodation. At the end of 2024, 47% of households in temporary accommodation contained children.

Homeless applications have been rising since 2021. In 2024, 2,624 households approached the council for advice and support either because they were at risk of homelessness or because they were homeless. Of these 2,366 made a homeless application. The number of households approaching the council after they had already become homeless also rose from 993 in 2021 to 1,230 in 2024.

If homelessness cannot be prevented the council may have an on-going duty to help applicants find a settled home if they are eligible, have a priority need and other tests are met. This is called the main housing duty. Those with priority need include pregnant people, families with children, and those who are homeless because of domestic abuse or due to an emergency such as a fire or flood or who are vulnerable in other ways. Households accepted as owed a duty under the main housing duty have more than doubled over the last 5 years with 616 acceptances in 2024 compared to 261 in 2020.

While people's homeless applications are being processed or while they are waiting to be rehoused, they may be placed in temporary accommodation. After falling between 2020 and 2022, the use of temporary accommodation by the council has again risen, with 1,928 households living in temporary accommodation at the end of 2024.

[1] Shelter, 2024, At least 354,000 people homeless in England today, https://england.shelter.org.uk/media/press_release/at_least_354000_people_homeless_in_england_today_

Rough sleeping is also rising. The rate of rough sleeping in Brighton & Hove was 20 per 100,000 population in October 2020. The rate in March 2025 was 30 per 100,000. Brighton & Hove has the joint 19th highest rate of rough sleeping in England.

Data from a recent audit of people with multiple compound needs indicates that there were 704 people in contact with services who were experiencing homelessness with 2 or more other compounding needs (mental health needs, substance use, experience of domestic violence, a history of offending).

The review of homelessness in Brighton & Hove is part of developing a new homelessness and rough sleeping strategy for the next 5 years. It aims to give a picture of homelessness in the city and identifies some of the issues and challenges the new strategy will need to address.

The review considers:

- the national and local context
- current levels of homelessness in the city and future estimates
- existing activities to prevent homelessness, secure accommodation for those experiencing homelessness and to provide support to households experiencing or at risk of homelessness
- the resources available to the council and other organisations to address homelessness

The review draws on quantitative information on homelessness collected by the council and its partners. Data cited are from the 5 calendar years from 1 January 2020 to 31 December 2024 unless otherwise stated. Figures for 2020, and to some extent 2021, are likely to have been skewed by the impact of the Covid-19 pandemic.

The review also contains qualitative evidence and insights from our partners including people with lived experience of homelessness, frontline workers and service providers across the city. All contributors have offered constructive challenge and feedback and have worked with us to identify the issues the new homelessness and rough sleeping strategy must address.

Our thanks to all of those who have contributed to this review.

Key findings and recommendations

This section summarises key findings from our review. The recommendations here are intended to be strategic and to inform the development of the new homelessness and rough sleeping strategy. There are other findings in the body of the review that may be relevant for commissioning and service improvement purposes.

Prevention

National and local evidence demonstrates that prevention works when deployed effectively – in Brighton & Hove 66% of prevention duties ended with positive outcomes in 2024. However, the council is seeing fewer people before they become homeless, with prevention assessments falling from 854 in 2023 to 594 in 2024. People with lived experience reported feeling 'isolated, unsupported, unsure of where to go' and said they faced barriers in accessing help before they became homeless.

Recommendation 1: Over the life of the strategy, work to shift the focus of prevention activity 'upstream' to identify individuals and households at risk and offer advice and practical support before they reach crisis point.

Moving prevention activity 'upstream' requires working with partners across health, social care, criminal justice, education, and voluntary sectors to identify people at risk of homelessness earlier. This should include improved use of data, including predictive analytics, training for frontline workers in universal services to recognise homelessness risk, and clear referral pathways.

Recommendation 2: Develop frontline partnership working, including through the duty to refer, and strengthen the approach to hidden homelessness.

While 517 referrals were made through duty to refer between 2020-2024, this represents significant untapped potential. Based on national evidence, women and young people are likely to be under-represented in council data, with many oscillating between different forms of insecure housing and homelessness and some not approaching the council for support at all. Targeted outreach and engagement approaches, combined with strengthened partnerships with universal and specialist services including employment, education and training, community safety and health and social care services.

Recommendation 3: Improve accessibility and coordination of advice services and reduce barriers to seeking help

People with lived experience of homelessness highlighted difficulties accessing support, including problems contacting the council, lack of clear information about processes and rights, and having to repeat their stories multiple times. A coordinated approach with clear access points, improved communication, and 'no wrong door'

principles would enable earlier intervention and prevent people reaching crisis before accessing help.

Recommendation 4: Strengthen prevention and early intervention work with key at risk groups including, people leaving institutions, care settings, including the asylum system, supported housing, and people fleeing domestic abuse.

The data shows that some groups are significantly over-represented among those experiencing homelessness. Discharge planning from institutional care, crisis support for those fleeing their homes and targeted early intervention can prevent homelessness and rough sleeping, with specialist protocols in place for at-risk groups.

Recommendation 5: Implement rapid response systems to prevent entrenched rough sleeping through fast-track access to assessment and accommodation.

With almost a third of people experiencing rough sleeping being new each month, rapid intervention can prevent entrenchment. This should include assertive outreach, improved assessment processes, rapid access to accommodation, and intensive early support to address the factors that led to rough sleeping. Eviction from temporary and supported accommodation due to unaddressed support needs can lead to cyclical or long-term rough sleeping.

Temporary accommodation

The number of households in temporary accommodation has risen over the last two years with 1,928 households at the end of 2024. As well as rising demand, there is a limited supply of suitable accommodation and escalating costs. The use of more expensive spot-purchased accommodation has also increased, with numbers rising from 114 to 379 units between 2022 and 2024. Move on from temporary accommodation is also an issue with a lack of suitable properties for private or social rent. Some people with lived experience reported feeling unsupported after move-on and highlighted an issue with a ‘revolving door’ of repeat homelessness for those whose support needs meant they were unable to sustain tenancies in settled accommodation.

There are also problems ensuring a supply of good quality temporary accommodation that is suitable for people’s needs within the city. People with lived experience and frontline support workers described properties that were ‘damp and in need of repairs’, lacking basic facilities, and feeling unsafe. Others highlighted that placement outside the city meant that their access to services, employment, education, and support networks were disrupted. The Health Counts survey found those in temporary accommodation were more likely to report poor mental health, feeling unsafe, and facing housing quality issues including damp, cold, and mould. These issues appear to relate mainly to interim accommodation (formerly known as emergency accommodation).

Recommendation 6: Implement a comprehensive approach to reducing the use of temporary accommodation over the life of the strategy focusing on prevention, increasing the supply of suitable accommodation, and accelerated move-on. This should have short, medium and long-terms goals, with an immediate goal of tackling rising costs to stabilise the system.

A projected 40% increase in net costs over the next two years demonstrates the unsustainability of current trends. A coordinated strategy should include prevention measures to reduce inflow, increased supply of suitable accommodation to meet both immediate needs and ensure improved quality in the long-term, and systematic approaches to accelerate move-on to settled housing. This requires a whole system approach given the housing supply and affordability challenges. It will also require difficult financial decisions in the short-term to stabilise the system and ensure longer term sustainability.

Recommendation 7: Improve standards for all temporary accommodation with a focus on interim accommodation.

The evidence from people with lived experience and health data indicates quality issues in some forms of temporary accommodation that impact health and other outcomes. This includes ensuring accommodation meets the specific needs of different household types. The expected extension of the Decent Homes Standard to private rented sector properties should facilitate this but enforcement may require additional resourcing.

Recommendation 8: Reduce reliance on spot-purchased accommodation through increased block-booking and direct provision

The significant increase in higher cost spot-purchased units highlights the financial unsustainability of current approaches. Developing longer-term arrangements with private landlords and increasing council-owned stock would provide better value for money and improved accommodation standards while reducing use of less suitable accommodation types, especially the use of B&B accommodation.

Recommendation 9: Improve our understanding of the support and service needs of people living in temporary accommodation through a comprehensive needs assessment.

Local Health Counts data indicate that there are significant health inequalities for those living in temporary accommodation. It does not consider the impact on children nor the impact on other outcomes such as employment, education and training. National evidence indicates that these are significant. Local specialist provision for people living in temporary accommodation is limited with most support services focused on single homelessness and rough sleeping.

Providing support

Most people experiencing homelessness have one or more support needs. The most common needs amongst those owed a relief duty include mental health needs (affecting 35% of those owed a relief duty), physical ill health and disability (22%), and substance use (12% drug, 10% alcohol).

More people are approaching the council with higher levels of need or with more complex needs. People with multiple compound needs are a particularly vulnerable group, with 704 people identified as experiencing homelessness with 2 or more other support needs. People sleeping rough often have the highest level of need, with complex and intensive support intervention needed. The current service landscape includes comprehensive provision but there are challenges with coordination, capacity, and sustainability. This includes existing day centre and supported housing models which should be reviewed.

Recommendation 10: Work with partners to develop integrated care pathways for people with multiple compound needs, including reviewing Housing First approaches for those with histories of long-term and repeat rough sleeping.

The independent evaluation of Changing Futures Brighton & Hove provides a clear framework for developing integrated support for the most vulnerable. This should include the planned Multiple Compound Needs Integrated Community Team and trauma-informed approaches. The existing Housing First service accommodates 60 people but could be expanded if financially viable given the evidence of its effectiveness for those with complex needs and histories of rough sleeping.

Recommendation 11: Strengthen mental health and substance use support with better integration between homelessness, health, and specialist services.

With mental health needs affecting significant proportions of people experiencing homelessness and substance dependency also being a major issue, better integration is needed between housing, health, and specialist services. This should include improved pathways, shared protocols, co-located services where appropriate, and enhanced partnerships with health services to address the healthcare needs of people experiencing homelessness.

Recommendation 12: Expand trauma-informed approaches across all homelessness services with enhanced peer support and lived experience involvement in service design and improvement.

The evidence shows high levels of trauma among people experiencing homelessness, including domestic abuse, adverse childhood experiences, and repeat homelessness. All services should adopt trauma-informed approaches, with staff training and service design reflecting understanding of trauma's impact on engagement and recovery. This

should include expanded peer support roles and systematic involvement of people with lived experience in service design and delivery.

Recommendation 13: Ensure that appropriate pathways and protocols are in place for those more vulnerable if they become homeless.

This includes care leavers, 16–17-year-olds, pregnant people, families with children, domestic abuse survivors, refugees and asylum seekers, LGBTQ+ people and other groups including people with mental health needs, those experiencing frailty, long term ill health or disability, to ensure coordinated assessment and support pathways.

Children, families and young people

Children (0-17) are disproportionately overrepresented amongst those experiencing homelessness. There were around 1,400 children experiencing homelessness in June 2024, representing almost 40% of all people experiencing homelessness in the city. Children make up about 17% of the city's population. At the end of 2024, 47% of households in temporary accommodation contained children. The number of young people aged 16-24 accepted as owed a main housing duty more than doubled from 52 in 2020 to 116 in 2024.

National evidence shows the significant consequences of homelessness for both children and young people. Survey research by Shelter found that 61% of parents felt temporary accommodation negatively impacted their children's stress or anxiety, while 47% of children had to move schools. The evidence also shows particular vulnerabilities for young people leaving care and young people with high or complex needs.

Recommendation 14: Develop a comprehensive approach to early identification and supporting families at risk of homelessness with early identification systems in schools, health services, and early help and family protection services.

The high proportion of children experiencing homelessness requires a dedicated focus that works across universal services. This should include training for staff to identify early warning signs, improved referral, and integration with children's social care assessment processes to address underlying issues before homelessness occurs. Preventing homelessness in families protects children from significant trauma and developmental harm. This can impact outcomes over a lifetime and potentially realise long term cost savings to the council and its partners.

Recommendation 15: Review and improve pathways and support for vulnerable families, children and young people including those fleeing domestic abuse, young people leaving care, young parents, and those with complex needs.

People fleeing domestic abuse represent a significant and vulnerable group. The pan-Sussex domestic abuse accommodation strategy is overdue for renewal. The increase in young people accepted as owed a main housing duty indicates potentially growing levels of vulnerability. Support service should address the distinct developmental needs of young people, including life skills training, education and employment support, and mental health provision. For young people leaving care, this should build on existing protocols to ensure transition to independence with adequate housing and support in place. Young parents require additional help combining parenting assistance with their own developmental needs.

Recommendation 16: Strengthen partnership working between housing and children's services, education, and youth services

Addressing the needs of children and young people affected by homelessness requires enhanced partnership working to address both immediate housing need and longer-term outcomes. This should include joint assessment processes, shared case management for families, and coordinated planning for young people transitioning to independence. Partnerships with education services are particularly important to minimise school disruption and support educational continuity.

Recommendation 17: Review existing services and develop trauma-informed, age-appropriate provision that address the specific impacts of homelessness on children and young people's development

National evidence shows significant psychological and developmental impacts of homelessness on children and young people. Services should be designed with understanding of child development and the ways homelessness affects different age groups. Those working with children and families should receive training in trauma-informed approaches and child development.

Delivering the strategy

There are systemic challenges in achieving and sustaining long term change. These include a chronic shortage of affordable housing that meets people’s needs, including accessible and family housing. There are broader economic pressures with rising inflation, increases in private sector rents and a Local Housing Allowance that is insufficient to cover housing costs for those on low incomes. Those approaching the council for support have increasing levels and complexity of need. There are also acute financial pressures affecting the council and its partners.

Achieving the desired shift to prevention is particularly challenging in a context where increasing demand and costs are absorbing more resources. Financial resources are also expected to reduce over the life of the strategy. In this unprecedented scenario both evidence-based, and innovative solutions are required. Clear prioritisation and

difficult, strategic and operational decisions are needed to address short-, medium- and long-term goals.

Recommendation 18: Embed homelessness prevention and response within a broader strategic framework addressing issues of housing supply, affordability, and economic growth.

The homelessness and rough sleeping strategy should be framed within a broader strategic approach that addresses issues of housing supply, affordability and economic growth as set out in the council plan *A better Brighton & Hove for All*, the housing strategy *Homes for Everyone*, the City Plan and the economic plan *Fairer, Greener, More Productive*. Even if progress is made on the drivers of homelessness, significant impact is unlikely to be realised in a 5-year timeframe. The council should therefore continue to work with its partners at local, regional and national levels to achieve the long-term changes required.

Recommendation 19: Establish clear governance arrangements for strategy delivery and rationalise and strengthen partnership working.

The current 32 partnership groups potentially create confusion and duplication. A new governance structure should include a strategic steering group with themed delivery groups covering prevention, accommodation, support services, and children, families, and young people. This would provide clear accountability and coordination for strategy implementation while ensuring the distinct needs of different groups are addressed.

Recommendation 20: Develop a short to medium term recovery plan that addresses the impact of rising demand and increasing costs on the homelessness system across the pathway.

The potential reduction in grant funding and further restrictions on its use create a significant financial challenge. There are also pressures on the council's overall budget position and those of its partners. In the short-term, action is needed to manage demand and bring down cost. In the medium-term there may be opportunities to pool funding and develop innovative models for service provision, including exploring social investment approaches.

Recommendation 21: Strengthen co-production and lived experience involvement in service design and delivery across all aspects of homelessness services

Involving people with lived experience can have a significant impact in improving services. This should be embedded systematically across all services, with resources for lived experience involvement, peer support roles, and feedback mechanisms. Approaches should ensure the voices of different groups, including children, young people, and families, are heard and acted upon.

Recommendation 22: Improve the collection and use of data to enable a clearer picture of demand and need. This includes more 'real-time' data analysis including financial data. Address gaps in our understanding and develop systems to collect and analyse relevant data. This includes assessment of the needs of people living in temporary accommodation, including children and families and young people.

There are significant gaps in our understanding of the needs of people experiencing homelessness. For example, council data collection systems only capture the support needs of the main homelessness applicant, with the needs of other members of the household not recognised. Some groups, such as young people and women are likely to be underrepresented in our data. Work to better capture and understand their needs would facilitate a data-led approach to the commissioning and provision of services.

Context

Definitions

There are different ways to define homelessness. Many people think about rough sleeping when they think about homelessness. Rough sleeping includes people bedding down on the streets or sleeping in unsuitable places such as on public transport, or in disused buildings.

The definition of homelessness used in this review encompasses not only rough sleeping but also people experiencing statutory homelessness and those living in precarious or temporary housing situations. People can be considered homeless even if they have a roof over their head if that accommodation is temporary, unsafe, or they have no legal right to remain there.

Statutory homelessness is a legal definition of homelessness that triggers a local housing authority's duty to provide help. Under UK law, a person is considered homeless if they have no accommodation that they are entitled to occupy, or they have accommodation but cannot reasonably be expected to continue occupying it. This includes situations where they have been evicted or asked to leave; where they cannot afford to pay rent or a mortgage and face eviction or repossession; where the accommodation is overcrowded, in poor condition, or unsuitable; where they face domestic abuse or harassment; or where they have been staying temporarily with friends or family but can no longer do so.

Local housing authorities like Brighton & Hove City Council have specific duties toward those who are statutorily homeless, including conducting assessments and potentially providing temporary or permanent accommodation. However, these duties are subject to eligibility criteria, priority need categories, and requirements around local connection and intentionality.

Hidden homelessness refers to people or households that are generally not captured in official statistics, usually because they have not approached their local housing authority for help or have not met eligibility criteria. It could involve 'sofa-surfing', staying with friends or family, people sleeping in vehicles or people selling sex for accommodation.

Temporary accommodation is a broad term. In this review it refers to accommodation secured by the council to meet its duties to homeless households under the 1996 Housing Act. It can include interim accommodation to meet a homeless household's immediate needs. It also includes longer term accommodation provided while a household which has been accepted as owed a main housing duty waits to move into permanent housing. For some households this can lead to years living in temporary accommodation with which they may be happy. Temporary accommodation can

include private rented housing, council owned properties, hostels and refuges as well as Houses in Multiple Occupation, B&Bs or hotels.

The legal and policy context

Key legislation

Housing Act 1996 (Part 7) provides the main legal foundation for preventing homelessness and assisting those threatened with or experiencing homelessness. It was amended by the Homelessness Act 2002, which extended priority need categories to include 16–17-year-olds, care leavers (18-20), and people vulnerable due to time in care, armed forces, prison, or fleeing violence. It required all housing authorities to develop homelessness strategies (renewed every 5 years) and mandated a strategic approach to prevention and accommodation provision

The Homelessness Reduction Act 2017 extended the prevention duty period from 28 to 56 days and required housing authorities to provide support to all affected households, not just those with priority need. It introduced a 56-day support period for those already homeless and required housing authorities to work with applicants to agree personalised housing plans.

The Domestic Abuse Act 2021 extended priority need to all eligible domestic abuse victims and introduced a new definition of domestic abuse for housing assessments.

The Supported Housing (Regulatory Oversight) Act 2023 brought in enhanced regulation of supported housing with the introduction of national standards and licensing schemes. The regulations and provisions within the Act are expected to be implemented over the next 2 years.

Housing authorities must also consider Children Act 1989 duties, public sector equality requirements, and health and wellbeing responsibilities when addressing homelessness.

An overview of the homelessness legislation is available in the government's *Homelessness code of guidance for local authorities*.

Core duties and processes

Housing authorities have a legal **duty to provide advice and information** about homelessness and the prevention of homelessness and the rights of homeless people or those at risk of homelessness, as well as the help that is available and how to access it. This should be designed with certain listed vulnerable groups in mind. These are prison leavers, care leavers, former members of identifieslar armed forces, victims of domestic abuse, persons leaving hospital, persons suffering from a mental illness or

impairment, as well as any other group that the authority identify as being at particular risk of homelessness. Authorities can provide the advice and information themselves or arrange for other agencies to do it on their behalf.

Housing authorities have a **duty to carry out an assessment** in all cases where an eligible applicant is homeless or threatened with homelessness. This should identify what has caused the homelessness or threat of homelessness, the housing needs of the applicant and any support they need to be able to secure and retain accommodation. Following this assessment, the housing authority must work with the person to develop a **personalised housing plan** which will include actions (or 'reasonable steps') to be taken by the authority and the applicant to try and prevent or relieve homelessness.

The prevention duty
Housing authorities have a duty to take reasonable steps to help prevent any eligible person (regardless of priority need status, intentionality and whether they have a local connection) who is threatened with homelessness from becoming homeless. This means either helping them to stay in their current accommodation or helping them to find a new place to live before they become homeless. The prevention duty continues for 56 days unless it is ended by an event such as accommodation being secured for the person, or by their becoming homeless.

The relief duty
If the applicant is already homeless, or becomes homeless despite activity during the prevention stage, the reasonable steps will be focused on helping the applicant to secure accommodation. This relief duty lasts for 56 days unless ended in another way. If the housing authority has reason to believe a homeless applicant may be eligible for assistance and has a priority need, they must be provided with temporary accommodation.

The main housing duty
If homelessness is not successfully prevented or relieved, a housing authority will owe the main housing duty to applicants who are eligible, have a priority need for accommodation and are not homeless intentionally. Certain categories of household have priority need if homeless, including pregnant women, families with children, and those who are homeless because of being a victim of domestic abuse or due to an emergency such as a fire or flood. Other groups may be assessed as having priority need because they are vulnerable because of old age, mental ill health, physical disability, having been in prison or care or because of becoming homeless due to violence.

Under the main housing duty, housing authorities must ensure that suitable accommodation is available for the applicant and their household until the duty is ended, usually with an offer of a settled home. The duty can also be ended for other reasons, such as the applicant turning down a suitable offer of temporary accommodation or because they are no longer eligible for assistance. A suitable offer of a settled home (whether accepted or refused by the applicant) which would bring the main housing duty to an end includes an offer of a suitable secure or introductory tenancy with a local authority, an offer of accommodation through a registered provider (also known as a housing association) or the offer of a suitable tenancy for at least 12 months from a private landlord made by arrangement with the local authority.

Housing authorities have various powers and duties to secure accommodation for homeless applicants, either on a temporary basis, to prevent or relieve homelessness, to meet the main housing duty or as a settled home. Accommodation must always be 'suitable' and there are set standards when private rented accommodation is secured for households which have priority need. Bed and breakfast accommodation is not considered suitable for families with children and households that include a pregnant woman, except where there is no other accommodation available, and then only for a maximum of 6 weeks. It is also deemed unsuitable for 16- and 17-year-olds.

A person would be **intentionally homeless** where homelessness was the consequence of a deliberate action or omission by that person. A deliberate act might be a decision to leave the previous accommodation even though it would have been reasonable for the person (and everyone in the person's household) to continue to live there. A deliberate omission might be non-payment of rent that led to rent arrears and eviction despite the rent being affordable.

Where people have a priority need but are intentionally homeless, the housing authority must provide advice and assistance to help them find accommodation for themselves and secure suitable accommodation for them for a period that will give them a reasonable chance of doing so. If, despite this assistance, homelessness persists, any children in the household could be in need under the Children Act 1989, and the family should be referred (with consent) to the children's social services authority.

In the homelessness legislation, people may have a **local connection** with a district because of residence, employment or family associations in the district, or because of special circumstances. There are exceptions, for example, residence in a district while serving a prison sentence there does not establish a local connection. Where applicants meet the criteria for the relief duty or for the main housing duty, and the authority considers that the applicant does not have a local connection with the district but does have one somewhere else, the housing authority dealing with the application

can ask the housing authority in that other district to take responsibility for the case. However, applicants cannot be referred to another housing authority if they, or any member of their household, would be at risk of domestic abuse or violence (that is not related to domestic abuse) in the district of the other authority.

The definition of a 'local connection' for young people leaving care was amended by the Homelessness Reduction Act 2017 so that a young homeless care leaver has a local connection to the area of the local authority that looked after them. Additional provision is made for care leavers who have been placed in accommodation, under section 22A of the Children Act 1989, in a different district to that of the children's services authority that owes them leaving care duties. If they have lived in the other district for at least 2 years, including some time before they turned 16, they will also have a local connection with that district until they are 21.

The duty to refer

The Homelessness Reduction Act 2017 introduced a duty on certain named public authorities to refer service users who they think may be homeless or threatened with homelessness to a housing authority. The service user must give consent and can choose which authority to be referred to. Local housing authorities are required to incorporate the duty to refer into their homelessness strategy and establish effective partnerships and working arrangements with agencies to facilitate appropriate referrals.

National strategic and policy context

A **national strategy on rough sleeping**, *Ending Rough Sleeping for Good*, was published in September 2022 with funding to 2025. It set out a four-pronged approach to rough sleeping of prevention, intervention, recovery and a more transparent and joined-up system.

After the 2024 national election, the new Labour government made a commitment to introduce **a new cross-government homelessness strategy** to address all forms of homelessness, not just rough sleeping. It is expected to have a focus on preventing homelessness. The work to develop the strategy has been led by the Ministry of Housing, Communities and Local Government with a launch now expected in late 2025.

As well as specific legislation and policy to tackle homelessness, homelessness is impacted by policy across a range of other areas.

The **Local Housing Allowance** is set nationally and determines the maximum housing benefit for private renters. It is meant to cover the bottom 30% of rents in a local area. The allowance has been frozen since 2020. This has a significant impact in a city like Brighton & Hove with a large private rented sector and where rents have risen

significantly over the last 5 years. It means that very few properties are available at the Local Housing Allowance rate, making it difficult for people on low incomes to find and afford suitable accommodation in the city.

In addition, the amount local authorities can claim against the cost of placing people in temporary accommodation is pegged at 90% of 2011 private rental levels. As noted above, private sector rents have risen significantly since 2011, so the recoverable amount for the council is now much lower. This is a problem which affects all housing authorities but for Brighton & Hove the funding gap is particularly acute.

The government has also set out plans to provide 'the biggest increase in social and affordable housebuilding in a generation'. To date, it has announced an additional £500 million of investment in the current **Affordable Homes Programme (AHP)**, bringing total investment in the AHP for 2025/26 to over £5 billion. The government is also aiming to 'better protect our existing stock' of social housing by making changes to the Right to Buy policy.

National **health and social care policy** is currently focussed on 3 'strategic shifts', moving care from hospital to community, 'analogue to digital' healthcare and, a shift in focus from treatment to prevention. Work is underway across Sussex to mobilise community-based models, including Integrated Community Teams and Mental Health Neighbourhood Teams. The local footprints of the new teams should support integration of health with social care and housing services.

Local strategic and policy context

Brighton & Hove City Council published a new council plan *A Better Brighton & Hove for All* in July 2023. The plan has 'homes for everyone' as a core mission with the explicit goal of delivering 'accessible, affordable, and high-quality homes for all residents of Brighton & Hove'. The plan was refreshed in July 2025, with commitments to improve standards in the private rented sector, deliver at least 2,000 affordable homes, create additional social housing lets, reduce the number of households in temporary accommodation, work with people with lived experience of homelessness to improve homelessness and housing options services, and to improve housing solutions for domestic abuse survivors.

In October 2024, the council agreed *Homes for everyone*, a new housing strategy for 2024 to 2029. The priorities in the strategy are to improve housing quality, safety and sustainability; to deliver the homes our city needs; to prevent homelessness and meet housing need; to promote improved health and wellbeing for all; and to provide resident focused housing services.

The City Plan is the strategic planning framework that sets out the long-term spatial vision and development strategy for the city of Brighton & Hove. The current plan was

adopted in 2016. The ongoing review and update of the City Plan Part 1 will take it to 2041. The City Plan is informed by the Strategic Housing Market Assessment commissioned by the council in 2023 which makes recommendations for new housing delivery targets and the mix of housing in the city, including the delivery of affordable and socially rented homes. Plans for economic growth and the labour market are outlined in the city's 3-year Economic Plan for 2024 to 2027.

Other relevant strategies and plans include the *Community Safety and Crime Reduction Strategy 2023 to 2026*, which amongst other priorities contains plans for tackling domestic abuse and dealing with anti-social behaviour. More detailed plans on tackling domestic abuse are included in the *Preventing and Tackling Violence Against Women and Girls, Domestic Abuse and Sexual Violence Strategy 2025-2028*.

The council is also required to set out how it will help, support and protect survivors of domestic abuse (and their children) in safe accommodation, in line with duties under the national Domestic Abuse Act 2021. It last did this in the *Pan-Sussex Strategy for Domestic Abuse Accommodation and Support 2021-2024*. The strategy was developed in partnership with the Sussex Police and Crime Commissioner, West Sussex County Council, East Sussex County Council.

The Brighton & Hove mental health and housing plan was produced by Sussex Health & Care Partnership. It has 5 strategic priorities which aim to improve outcomes and increase access to support and accommodation for people with mental health needs through better integration of housing, health and care services. Delivery of the action plan is overseen by the multi-agency Mental Health Accommodation Group.

The council sets out who gets priority for social housing in its Housing Allocations Policy. In 2025, the council changed its Housing Allocations Policy with the goal of creating more opportunities to prevent homelessness, reduce reliance on temporary accommodation and provide more options for social housing tenants fleeing domestic abuse. Under the revised policy, if a household likely to be owed the main housing duty secures alternative accommodation while homeless or at risk of homelessness, they can remain on the housing register if they continue to qualify. The council anticipates that this will help reduce the number of households living in temporary accommodation in the city.

The council has recently developed a joint protocol to improve its response to the needs of homeless 16- and 17-year-olds. A care leavers' housing protocol has also been agreed, to ensure that looked after children have a firm offer of accommodation which meets their needs on leaving council care. Support for care leavers, including accommodation support is set out the Local Offer for Care Leavers. An Accredited Provider List to provide supported accommodation for care-experienced young people aged between 16 and 24 is in place. For 16- and 17-year-olds this offers an alternative

to foster care or residential childcare placements for young people who find it difficult to thrive in those environments.

The council took part in legal action against the Home Office concerning the treatment of unaccompanied asylum-seeking children, winning a landmark case in the High Court in 2023. The judgment has led to a change in national policy, so that unaccompanied asylum-seeking children can no longer be placed in hotels and B&Bs but must be placed by the National Transfer Scheme into foster placements under the Children Act.

The Pan Sussex Trauma-Informed Framework was developed by Brighton & Hove and Sussex local authorities, Sussex Health Trusts, the community and voluntary sector and people with lived experience. Its goal is to create lasting, high-quality trauma-informed practice across the region.

Planned legislation and policy changes

The Renters Rights Bill was introduced to parliament in September 2024. The government promises to transform the experience of private renting, including by ending Section 21 'no fault' evictions. The bill aims to give renters greater security and stability 'so they can stay in their homes for longer, build lives in their communities, and avoid the risk of homelessness'.[2]

As well as ending Section 21 evictions the bill introduces a range of reforms, including ending the system of assured shorthold tenancies; creating a new register of private rented sector (PRS) landlords and property portal to improve data on the PRS and drive up standards; protecting tenants from above market rent increases, providing stronger protections against backdoor evictions; applying both the Decent Homes Standard and Awaab's Law to the private rented sector (including temporary accommodation and supported housing); making it illegal for landlords and agents to discriminate against prospective tenants in receipt of benefits or with children; prohibiting landlords from soliciting rental bidding; establishing an Ombudsman to help tenants and landlords to resolve disputes; and enabling better enforcement through expanded use of Rent Repayment Orders.

Private landlords play an important role in housing in the city, with around 1 in 3 homes privately rented. While most private sector landlords provide a good service, the sector currently has some of the least affordable, poorest quality and most insecure housing of all forms of tenure. A well-functioning private rented sector should provide security for both tenants and landlords as well as alleviating homelessness.

[2] Guide to the Renters Rights Bill, Ministry of Housing, Communities & Local Government, https://www.gov.uk/government/publications/guide-to-the-renters-rights-bill/guide-to-the-renters-rights-bill

The Planning and Infrastructure Bill was introduced to parliament in March 2025. It is central to the government's ambitions to deliver 1.5 million homes and decide 150 nationally significant infrastructure projects before the end of the current parliament.

In June 2025 the government announced that it would repeal the Vagrancy Act 1824 which made rough sleeping a criminal offence. This will be done through a government amendment to the Crime and Policing Bill, with the change coming into effect in 2026. The Bill also includes a new offence of facilitating begging for gain and an offence of trespassing with the intention of committing a crime, both of which were previously part of the 1824 Act.

Alongside East Sussex County Council and West Sussex County Council, Brighton & Hove City Council successfully applied to join the Devolution Priority Programme. A new Mayoral Strategic Authority for Brighton and Sussex will be created with mayoral elections planned for May 2026. At this point, the range of devolved powers for the Mayoral Strategic Authority have not been confirmed. It is likely that powers will be devolved in stages over time. In a parallel process, plans for broader local government reorganisation could result in a shift in the boundaries of the city as a local authority.

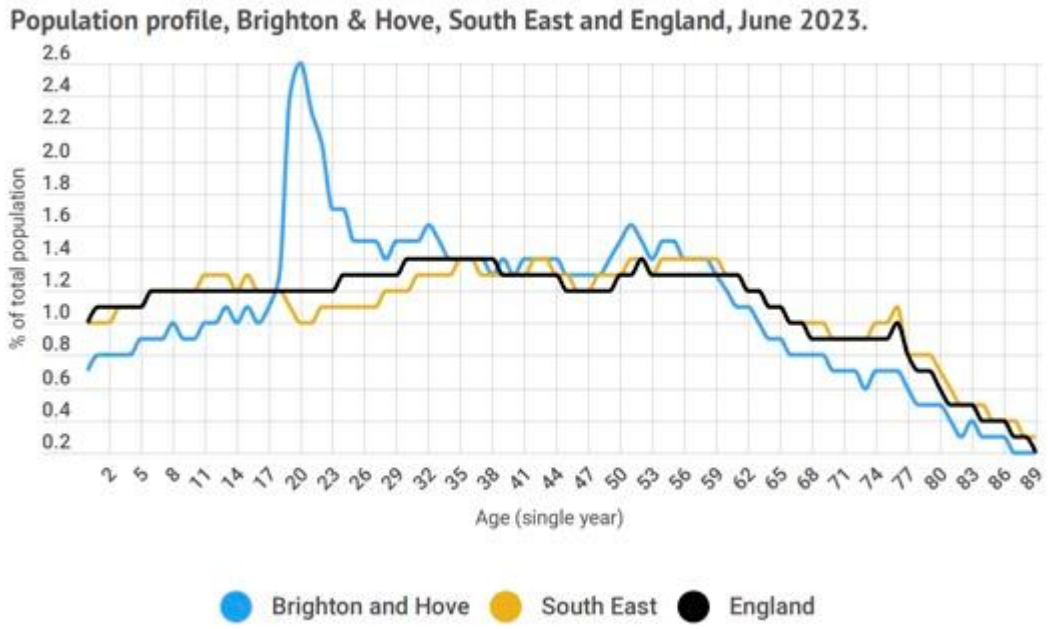
A key local ambition is the development of an integrated homeless healthcare hub that brings specialist homeless healthcare services into a central hub, so people who are homeless with Multiple Compound Needs can better access the healthcare they need Arch Health Community Interest Company have carried out several scoping exercises and have been developing this vision with partners over many years. Work with Common Ambition's lived experience group led to the publication of Our Big Hub Idea in 2023.[3] The Big Hub idea highlights the benefits of co-locating a range of welfare and support services alongside key health services. Partners are actively working together through the Multiple Compound Needs programme to realise this ambition.

[3] Common Ambition, 2023, *Our Big Hub Idea*
https://www.bhcommonambition.org/resources/#homeless-healthcare-hub

City population profile

There were 279,600 residents in the city of Brighton & Hove in 2023 according to the Office of National Statistics (ONS) mid-year population estimates.

In 2023, it is estimated that 40,800 people (15%) were aged 0 to 15 years old, more than two thirds (73%, 203,700 people) were aged 16 to 66 years old, one in ten (11%, 29,600 people) were aged 67 to 84 years old and 5,400 people (2%) were aged 85 years or older.



Brighton & Hove has an unusual population profile compared to the South East and England. The city has a much higher proportion of people aged 19–31 years (23%, 64,800 people) compared to only 15% in the South East and 16% in England. The difference is most pronounced between the ages 19 to 22 years old. Nearly one in ten of Brighton & Hove's total population (9%, 26,200 people) is aged 19 to 22 years old compared to only 4% in the South East and 5% in England.

Brighton & Hove has a lower proportion of children aged 0 to 17 years of age. (17%, 46,700 people) compared to 21% in both the South East and England. There are also fewer people across all ages from the age of 60 years old. In Brighton & Hove less than a fifth of the total population (19%, 54,600 people) is aged 60 years old or older compared to 26% in the South East and 25% in England.

Our city consists of different and diverse communities. Black and racially minoritised groups and Lesbian, Gay, Bisexual and Trans (LGBT) people are key population groups.

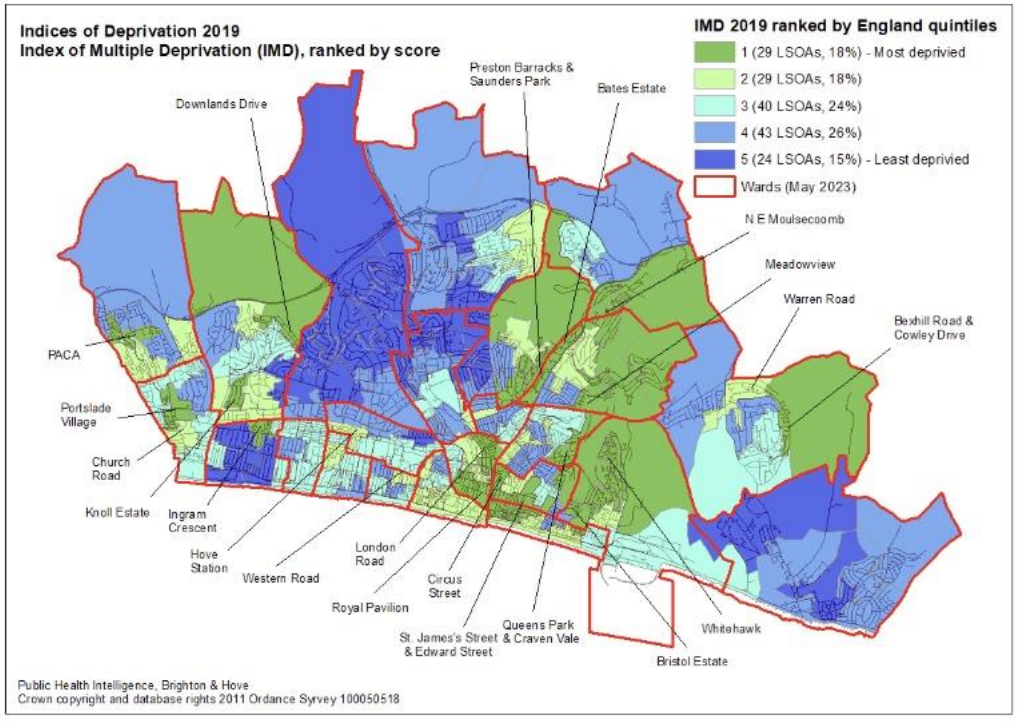
The most up to date data from the 2021 census shows that 72,272 residents (26%) are from a Black or Minority Ethnic group. This is higher than in the South East (21%), and similar to England (27%).

At least 25,247 residents age 16+ (10.6%) identified as Gay or Lesbian, Bisexual or Other sexual orientation. This is three times higher than seen in the South East (3.1%) and England (3.1%) and the highest proportion in any upper tier local authority in England. At least 2,341 residents aged 16+ (1.0%) identify with a gender different from their sex registered at birth. This is double what is found in the South East (0.5%) and England (0.5%).

The broader determinants of homelessness

Poverty, deprivation and housing quality

In 2019, 17% of the population of the city lived in one of the 20% most deprived areas in England and 13% lived in one of the 20% least deprived areas in England. Some areas are more affected by deprivation than others. The highest concentration of deprivation is in Whitehawk, Moulsecoomb, and Hollingbury. Along the coast, to the west of the city and in Woodingdean there are also pockets of deprivation. All these areas are in the 20% most deprived areas in England.



In 2023 12.1% of households in the city (15,522 households) were estimated to be in fuel poverty compared to 9.6% in the South East and 13% in England. In 2019 around 15% of children were estimated to live in poverty in the city, compared to 13% in the South East and 17% in England.

17% of occupied homes in Brighton & Hove are estimated to be non-decent under the Decent Homes Standard (20,500 homes). The percentage for England is 15%. In

Brighton & Hove, 20% of private rented homes are non-decent, 14% of social rented homes and 15% of owner-occupied homes.

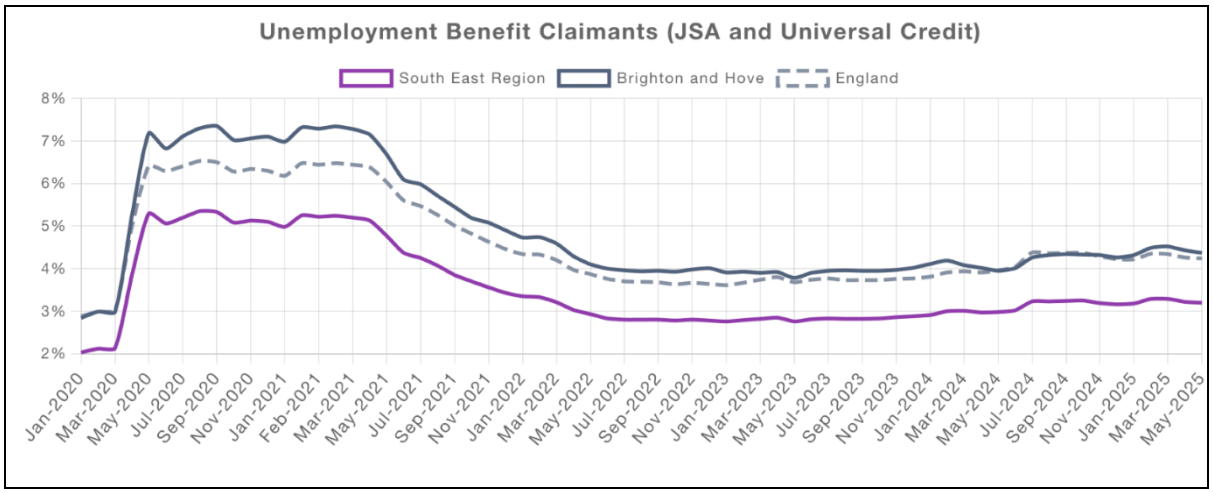
At the 2021 Census 12.53% of households in Brighton & Hove were living in overcrowded homes. This compares with 5.59% in the South East and 6.44% in England.

Education, employment and income

At the 2021 Census, 44.52% of people in Brighton & Hove (104,790 people) had a Level 4/5 qualification (HNC/HND or equivalent). This is higher than the rates for the South East (35.77%) and England (33.92%). The percentage of people in Brighton & Hove with no 16+ educational qualifications was 12.41% (29,215 people) at the 2021 Census. This compares with 15.38% for the South East and 18.08% for England.

In May 2025, 4.37% of working age people in the city were unemployed (8,630 people). This was higher than both the South East (3.2%) and England (3.8%) averages. At 3.58% (1,360 people), the rate of youth unemployment in Brighton & Hove was lower than the South East (4.39%) and England (5.58%) averages

The chart below shows the total proportion of people receiving unemployment benefits (Job Seekers Allowance or Universal Credit) between January 2020 and May 2025 for the South East, Brighton & Hove and England.



Source: Department for Work and Pensions

At the time of the Census in 2021, 4.42% of working age adults (10,400 people) in the city were economically inactive because of long-term sickness or disability. This is higher than the South East (3.11%) and England (4.07%). In addition, another 3.05% of working age adults (7,176 people) in Brighton & Hove were economically inactive for other reasons. This compares with 2.67% in the South East and 3.14% in England.

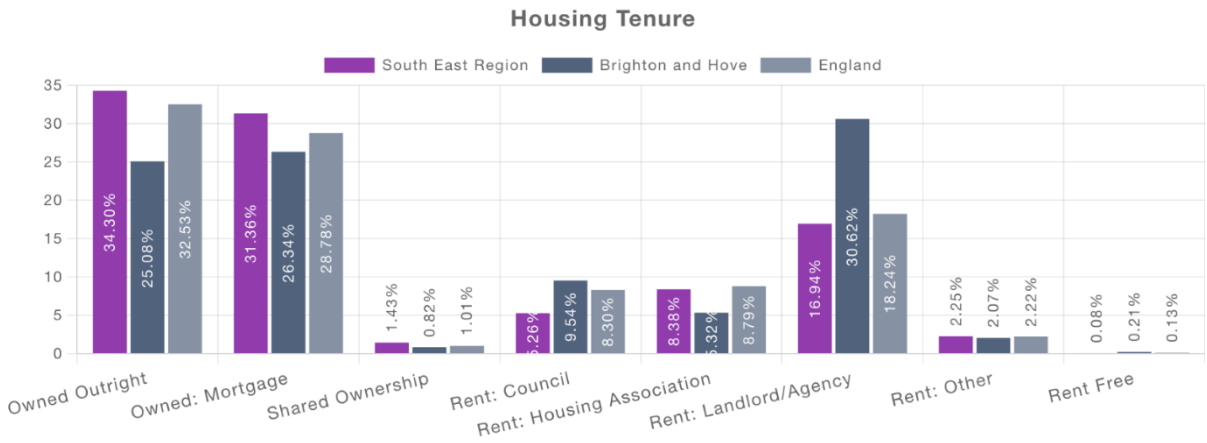
In 2023, some 16% of households had no individuals aged 16 or over in employment (15,000 households). This compares to 11% of households in the South East, and 14% in Great Britain.

The median gross weekly full-time employee earnings in Brighton & Hove in 2024 were £725. This was lower than in the South East (£754) and Great Britain (£730)

Housing supply and affordability

Housing tenure

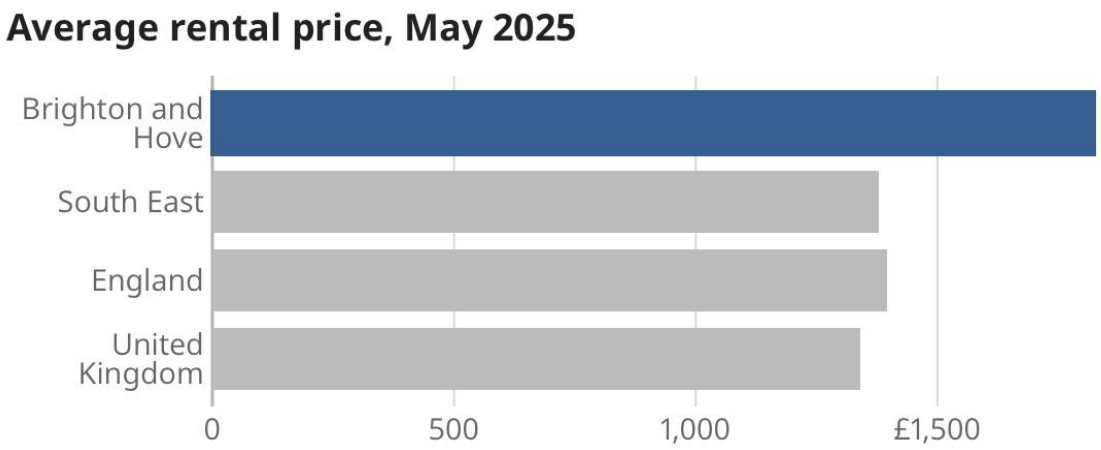
Compared with the South East and England, Brighton & Hove has a lower proportion of owner occupiers and a higher proportion of private renters. The private rented sector accounts for 30.62% of homes in the city (South East 16.94%; England 18.24%). The chart below shows the proportion of housing by tenure type for the South East, Brighton & Hove and England.



Source: Census 2021

Private renting

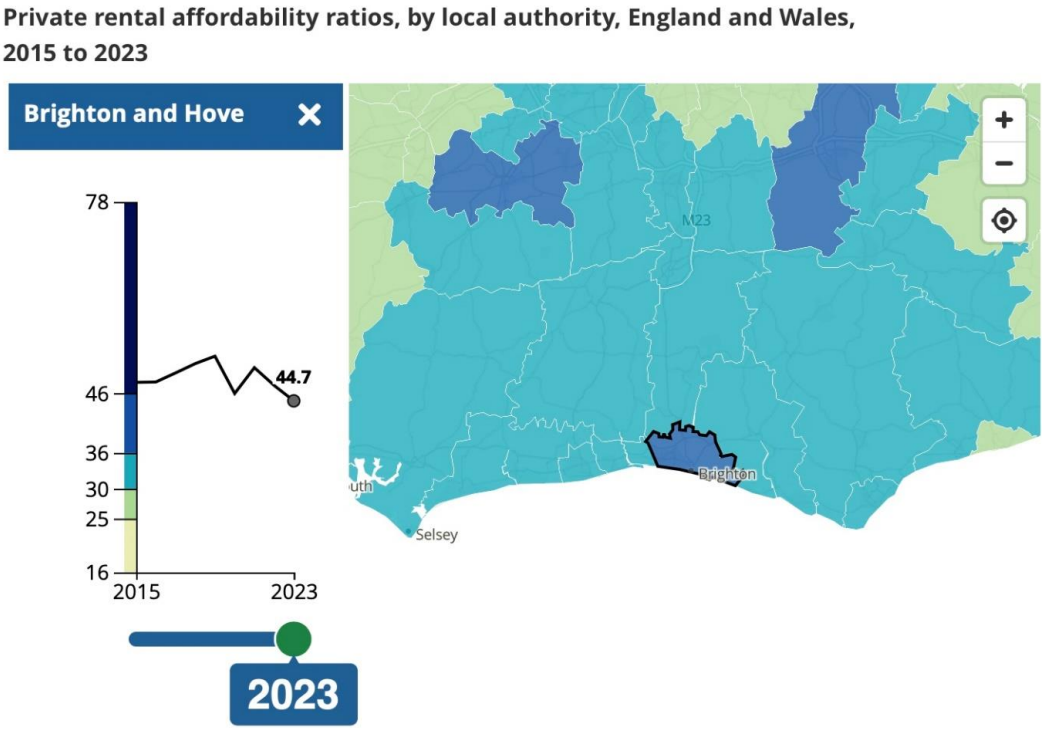
The average monthly private rent in Brighton & Hove was £1,824 in May 2025. This was an increase from £1,732 in May 2024, a 5.3% rise. This is significantly higher than the average across the South East (£1,377), and England (£1,394).



Source: Price Index of Private Rents, Office for National Statistics

The Office for National Statistics (ONS) publishes data on rental affordability. The latest figures are from 2023. The 'affordability threshold' is set by the ONS at 30% of a private renting household's income. A private renter on a median household income in Brighton & Hove could expect to spend 44.7% of their household income on an average-priced rented home. This is significantly higher than the South East (31.9%) and England (34.2%) averages.

The chart below shows private rental affordability over time in Brighton & Hove between 2015 and 2023. The accompanying map shows private rental affordability in Brighton & Hove compared with surrounding local authorities in 2023.



Source: Private rental affordability, England and Wales: 2023, Office for National Statistics

Research carried out in 2022 indicates that 'the rental property market in Brighton & Hove is very buoyant, with landlords demanding increasingly high rents as they seek to pass on the cost of mortgage/interest rate increases to renters. This is being supported by very strong demand and a shortage of rental housing stock in the city. These factors have combined to mean renters are having to bid for properties allowing landlords to secure record rents'.[4]

Home ownership

According to the Office for National Statistics, the average property price for all dwelling types in Brighton & Hove in April 2025 was £413,676. This was significantly higher than the averages for the South East (£380,428) and for England (£286,327). The table below shows average prices for different types of property for Brighton & Hove, the South East and England & Wales.

Average House Prices April 2025

	Detached	Semi-det	Terraced	Flat/mais	Average
BRIGHTON & HOVE	£848,405	£540,748	£470,139	£308,290	£413,676
SOUTH EAST	£690,816	£416,441	£317,638	£211,582	£380,428
ENGLAND	£467,414	£282,810	£234,219	£221,608	£286,327

Source: UK House Price Index, Office for National Statistics and HM Land Registry

Housing in Brighton & Hove is less affordable than England and is becoming more expensive at a faster rate. Those on the lowest 25% of earnings in the city need 12 times their earnings to afford the lowest 25% of house prices (2022). This was higher than in the South East (10.4 times), and England (7.3 times). Over the last decade, this has increased by 8.5 times in Brighton & Hove and by 6.6 times for England.

Future need for housing

A detailed analysis of the housing market in the city can be found in the Brighton & Hove Strategic Housing Market Assessment (SHMA) 2023. This report informs planning and housing policies in the city, including the ongoing review of the City Plan Part 1. The current City Plan expires in 2030, and the new plan will set out the strategic planning framework for Brighton & Hove until 2041. It will include targets for new housing, development and infrastructure.

The SHMA recommends a housing target of at least 810 new dwellings a year in the city. The SHMA also identifies a substantial need for an additional affordable rented homes in the city. It recommends that, while the link between overall housing need and affordable housing need is complex, the council should aim to maximise the delivery of affordable social rented housing. The Brighton & Hove housing strategy 2024 to 2029

[4] Brighton & Hove Strategic Housing Market Assessment (2023), Iceni Projects Ltd, p. 124.

sets a target for delivering at least 2,000 affordable homes over the five years of the strategy.

Health and disability

In the Census 2021, 7.34% of respondents said that their day-to-day activities were limited a lot by a long-term illness, health problem or disability. This was higher than the rate for the South East (6.26%) and similar to the rate for England (7.33%).

In Brighton & Hove 8.6% of the working age population (17,095 people) are receiving Personal Independence Payments (PIP). This is higher than the South East (7.4%) but lower than England (9.63%). The table below shows a series of indicators related to disability benefits providing the total numbers of claims and proportions within each area that are accessing the support systems available. Brighton & Hove is compared with the South East and England.

Community connectedness

The Community Needs Index was developed by Oxford Consultants for Social Inclusion to identify areas experiencing poor community and civic infrastructure, relative isolation and low levels of participation in community life. The index was created by combining a series of 28 indicators, conceptualised under three domains: Civic Assets, Connectedness and Active and Engaged Community. A lower rank indicates that an area has relatively higher levels of need. With an overall rank in 2023 of 22,368, Brighton & Hove has lower levels of community needs than the South East (17,783) and England (17,040).

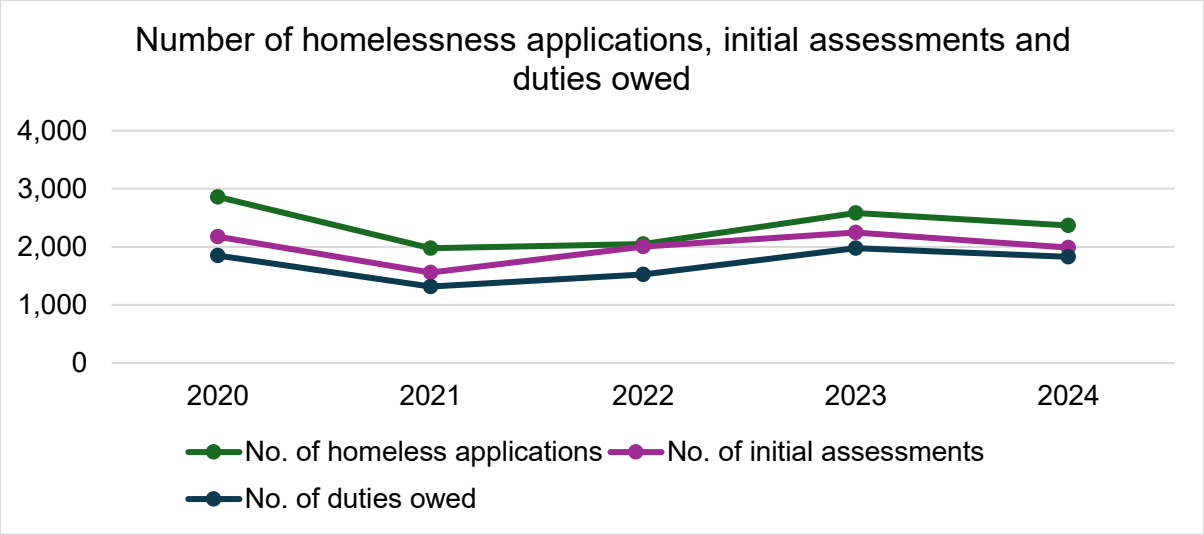
Data on homelessness and rough sleeping in the city

Homelessness approaches and applications

2,624 households approached the council for homelessness advice and support in 2024. Some people may approach other organisations for advice and support, but this is not captured in council data. Demand for advice and support from the council has fluctuated, with 3,014 households approaching the council in 2023. In 2022, 2,394 households approached the council.

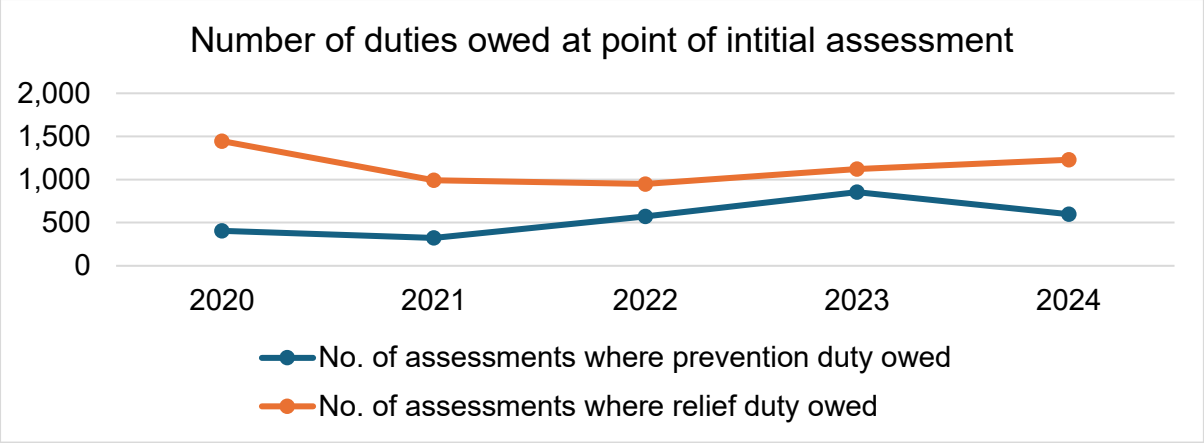
Not all approaches for advice and support result in a homeless application. For example, someone may decide not to apply if their housing situation is resolved with initial advice and support. In 2024 2,366 homelessness applications were made. This figure has risen since 2021 (1,976 applications).

The number of initial assessments has also risen since 2021, with 1,985 assessments in 2024 compared with 1,557 in 2021. Of those households assessed, a prevention or relief duty was owed in most cases, with 1,827 households owed a prevention or relief duty in 2024 compared with 1,316 in 2021.



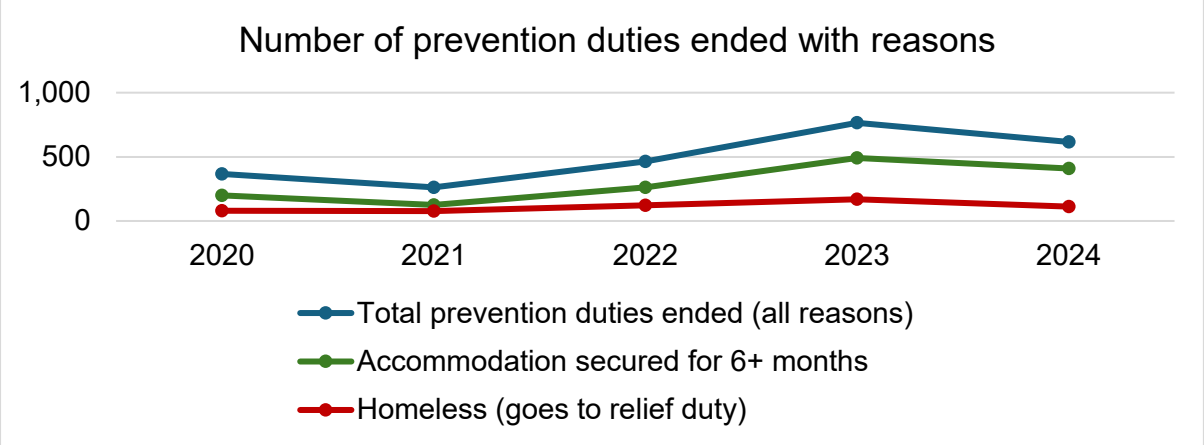
Source: Home Connections (data extracted 13 Jan 2025)

The chart below shows the number of duties owed at the point of initial assessment. Between 2020 and 2024, each year more people were assessed by the council at the relief stage (when they were already homeless) than those assessed at the prevention stage (when homelessness could potentially be prevented). While the number of assessments carried out at the prevention stage rose from 406 in 2020 to 854 in 2023, the number fell to 594 in 2024. After a fall in the number of those assessed as owed a relief duty to 949 in 2022, the number rose to 1,230 in 2024.



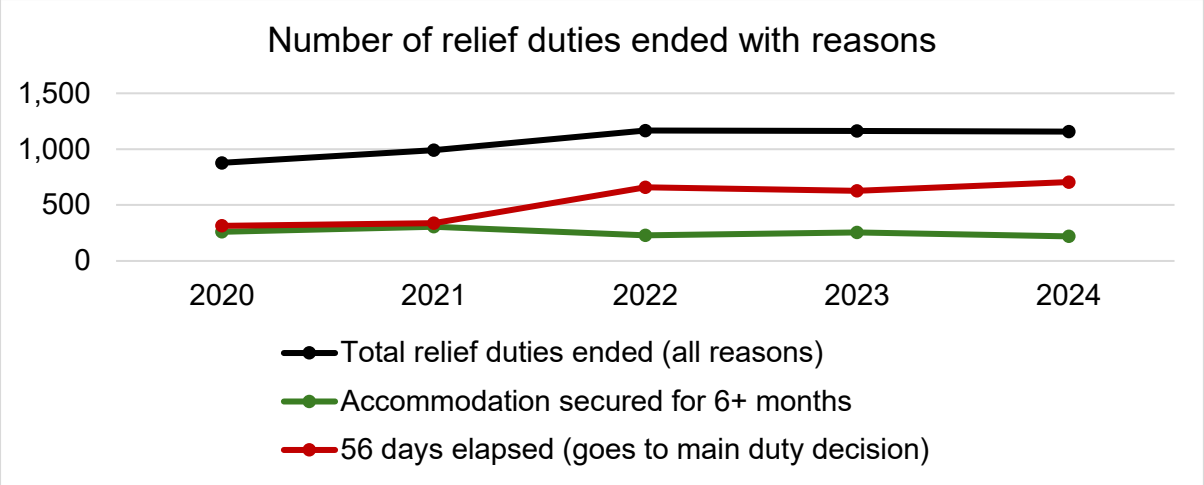
Source: Home Connections (data extracted 13 Jan 2025)

The chart below shows the reasons for ending a prevention duty between 2020 and 2024. For prevention duties which ended each year, the total number decreased from 765 in 2023 to 617 in 2024. Although the proportion of prevention duties which ended with a positive outcome (where existing or alternative accommodation was secured for 6 or more months) slightly increased, the number of households whose duty ended with a positive outcome fell, from 491 in 2023 to 410 in 2024.



Source: Home Connections (data extracted 13 Jan 2025)

The chart below shows the reasons for ending a relief duty between 2020 and 2024. The total number of relief duties increased over this period from 878 in 2020 to 1,157. The number of relief duties which ended in a positive outcome with accommodation secured for 6 months or more remained relatively stable. However, the number of relief duties which did not achieve a positive outcome and moved to a main duty decision more than doubled from 314 in 2020 to 706 in 2024.



Source: Home Connections (data extracted 13 Jan 2025)

The Homelessness Reduction Act 2017 introduced a duty on certain named public authorities to refer service users (with their consent) who they think may be homeless or threatened with homelessness to a housing authority. The table on the next page shows the number of applicants referred by those organisations. Most organisations making referrals do so at the relief duty stage, that is when their service user is already homeless.

Duty to Refer by duty owed at point of initial assessment and agency type (2020 to 2024 combined)	Where prevention duty owed	Where relief duty owed	Total referrals
Adult Secure Estate (prison)	0	8	8
Adult Social Services	8	23	31
Children's Early Help services / Children's Centres	1	1	2
Children's Social care	9	28	37
Community Based Health Service – physical health and well being	0	2	2
DWP – Jobcentre Plus	2	2	4
GPs	3	1	4
Hospital A&E or in-patient	6	66	72
Local authority landlord	2	1	3
Mental Health Service – Acute in-patient	5	50	55
Mental Health Service – Community based	24	13	37
National Asylum Service accommodation provider	1	2	3
National Probation Service	23	166	189
Other local authority service	0	4	4
Other service provider (not housing specific)	0	11	11
Police	1	20	21
Private Registered Provider (Housing Association)	0	1	1
Refuge provider	0	4	4
School, Youth and Education Services	1	10	11
Street Services for rough sleepers	0	4	4
Streetlink	0	3	3
Supported housing, hub or Housing Related Support Provider	3	6	9
Troubled Families / Families Intervention Programme	0	1	1
Youth Secure Estate	0	1	1
Total	**89**	**428**	**517**

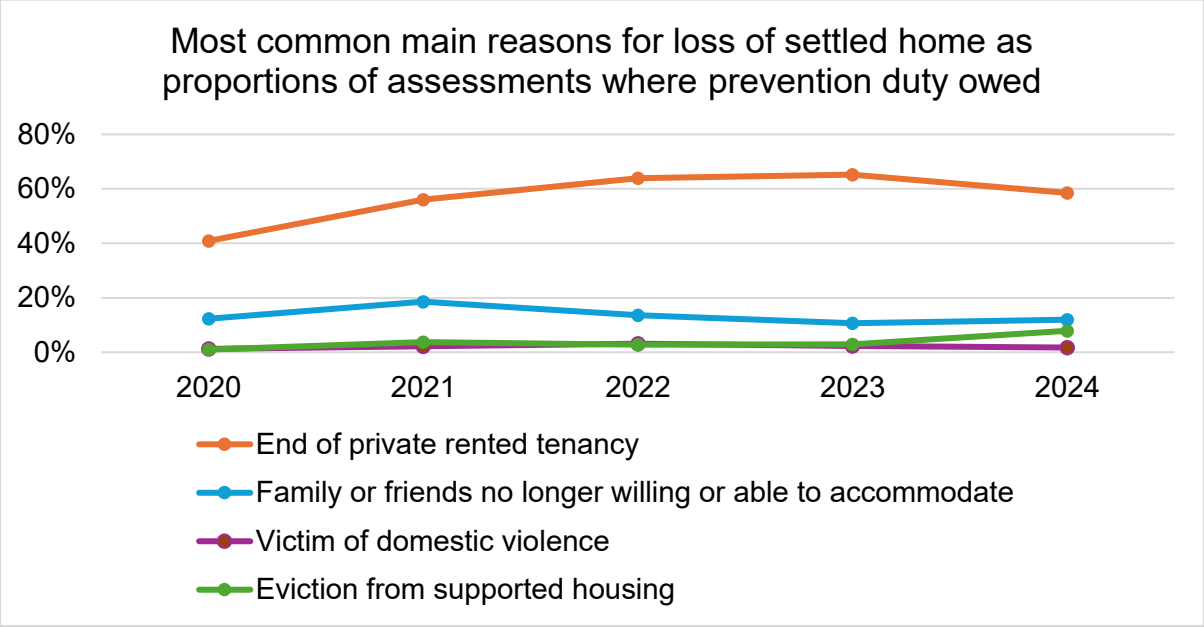
Source: Home Connections (data extracted 13 Jan 2025)

Reasons for loss of settled home

For those households owed a prevention or relief duty, there are four main reasons for loss of a settled home – the end of a private rented tenancy, family or friends no longer willing to accommodate, fleeing domestic violence and eviction from supported housing.

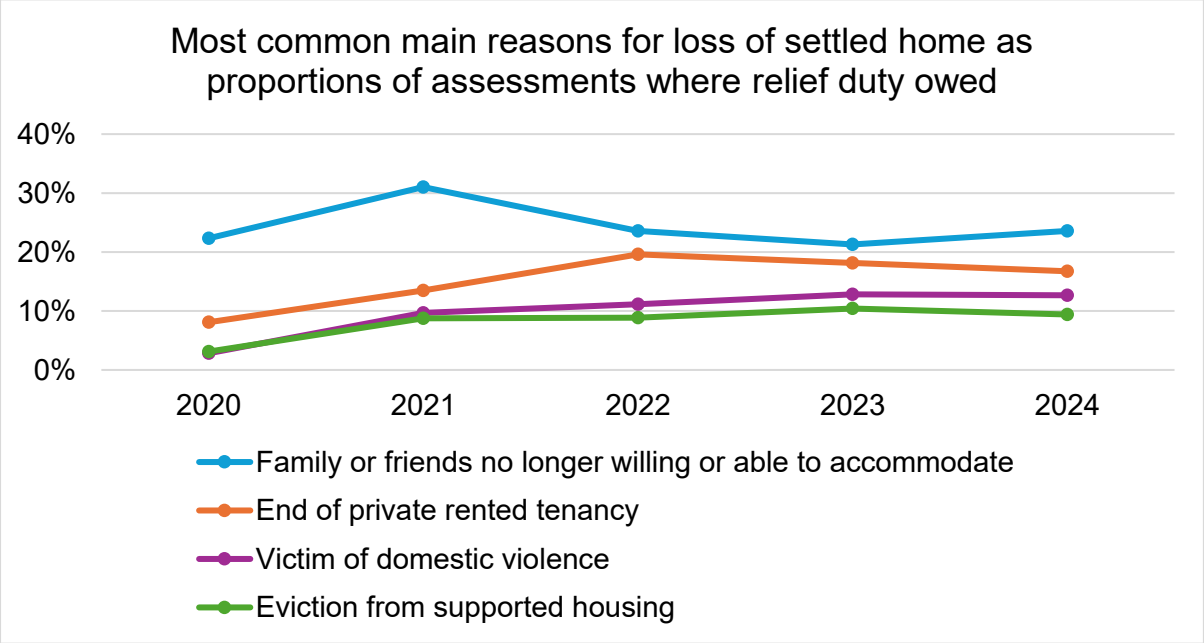
The chart below shows the most common reasons for loss of settled home for those owed a prevention duty by the council. For these households, the most common reason for threatened loss of a settled home was the end of a private rented tenancy.

The proportion of cases owed a prevention duty for this reason increased from 41% 2020 to 58% in 2024. Family or friends no longer willing or able to accommodate was the second most common reason.



Source: Home Connections (data extracted 13 Jan 2025)

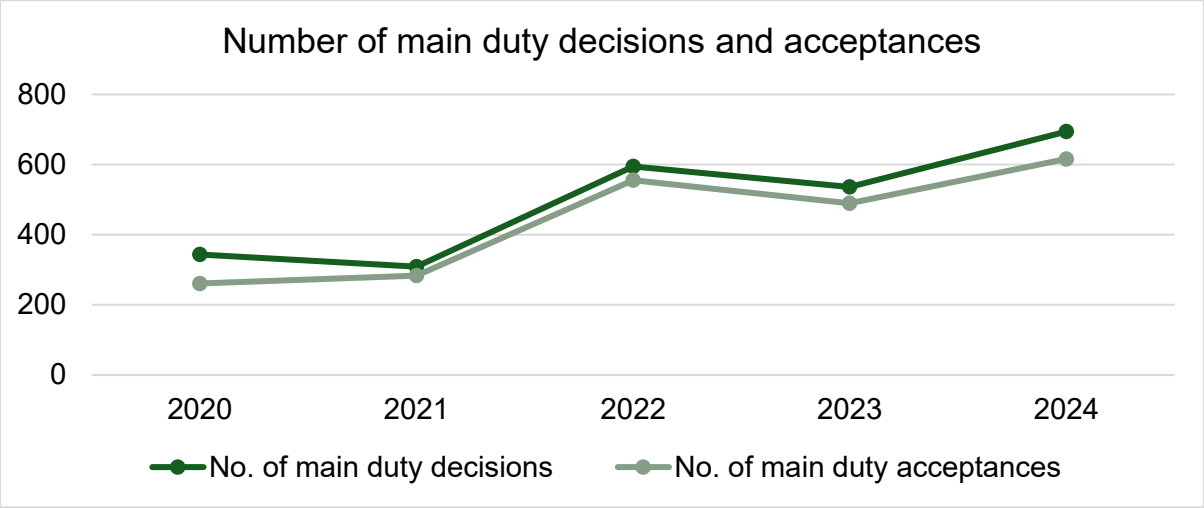
The chart below shows the most common main reasons for loss of settled home for those households owed a relief duty by the council. For households owed a relief duty, the most common reason for loss of a settled home was that family or friends were no longer able to accommodate them. The proportion of cases owed a relief duty for this reason increased slightly from 22% in 2020 to 24% in 2024. End of private rented tenancy was the second most common reason.



Source: Home Connections (data extracted 13 Jan 2025)

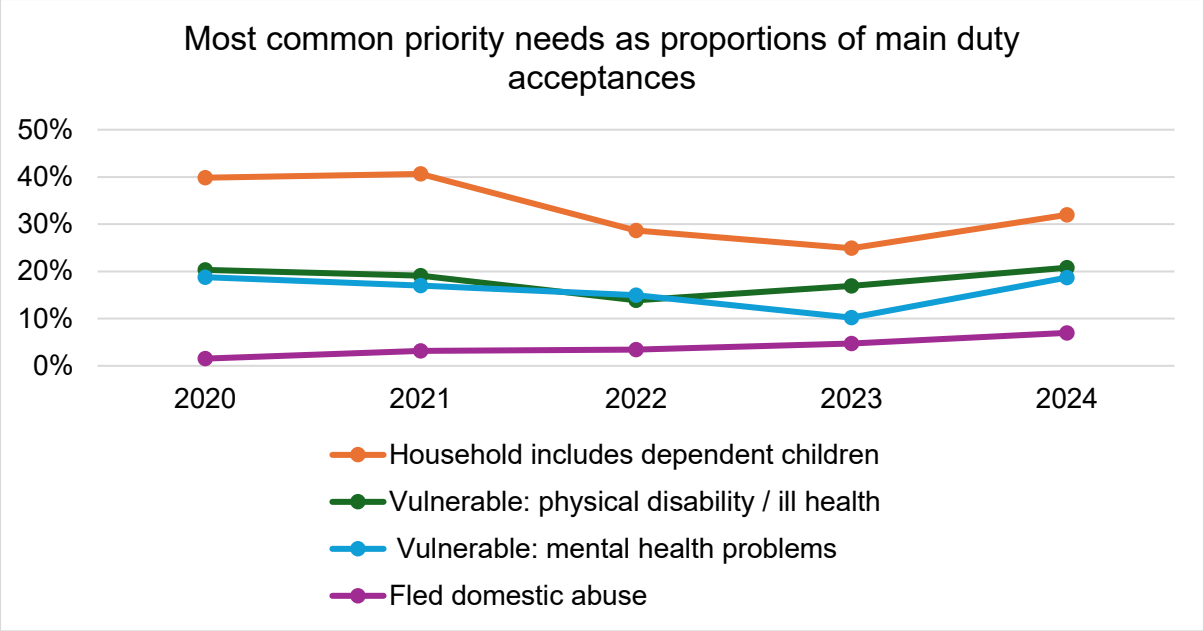
The main housing duty

If it is not possible to prevent or relieve a household's homelessness, then the council must decide whether the household meets the criteria for the main housing duty. The chart below shows the number of main duty decisions made and acceptances. Most decisions resulted in acceptance. The number of households accepted as being owed a main housing duty has increased since 2020. 261 households were accepted as owed a main duty in 2020. This figure had risen to 616 in 2024, an increase of 136%.



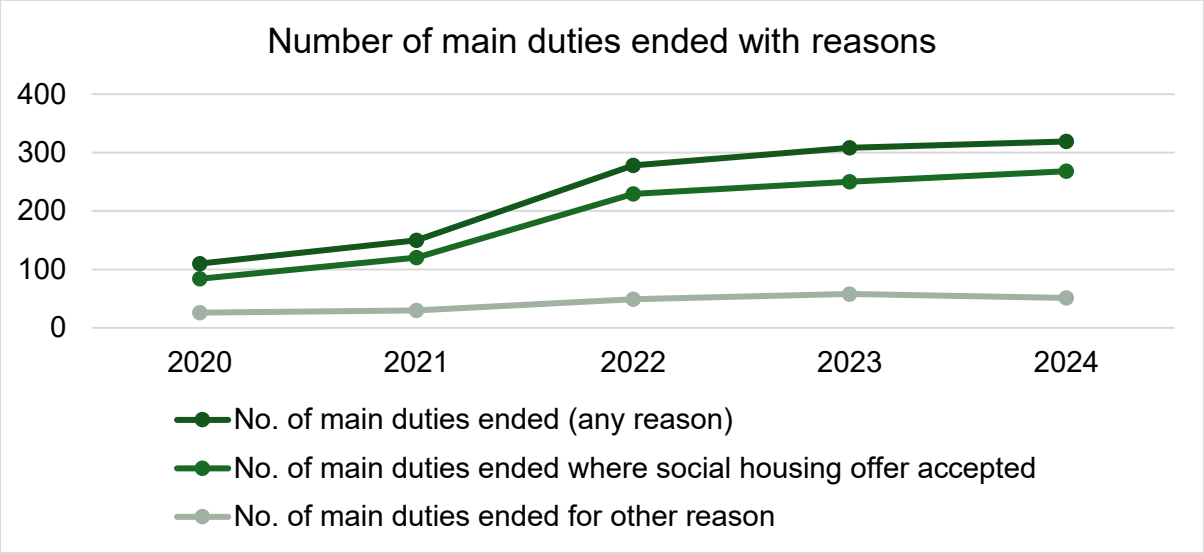
Source: Home Connections (data extracted 13 Jan 2025)

The chart below shows the most common priority needs amongst those accepted as owed a main duty. The most common priority housing needs amongst households accepted as owed a main housing duty were because the household included dependent children, physical disability or ill health, mental health problems, domestic abuse. Together these made up 70% of all households accepted as owed a main housing duty in 2024.



Source: Home Connections (data extracted 13 Jan 2025)

The chart below shows the number of main housing duties ended with reasons. Over the last 5 years around 82% of main duties ended with a social housing offer accepted. This proportion has remained constant even though the number of main duties accepted and ended have increased.

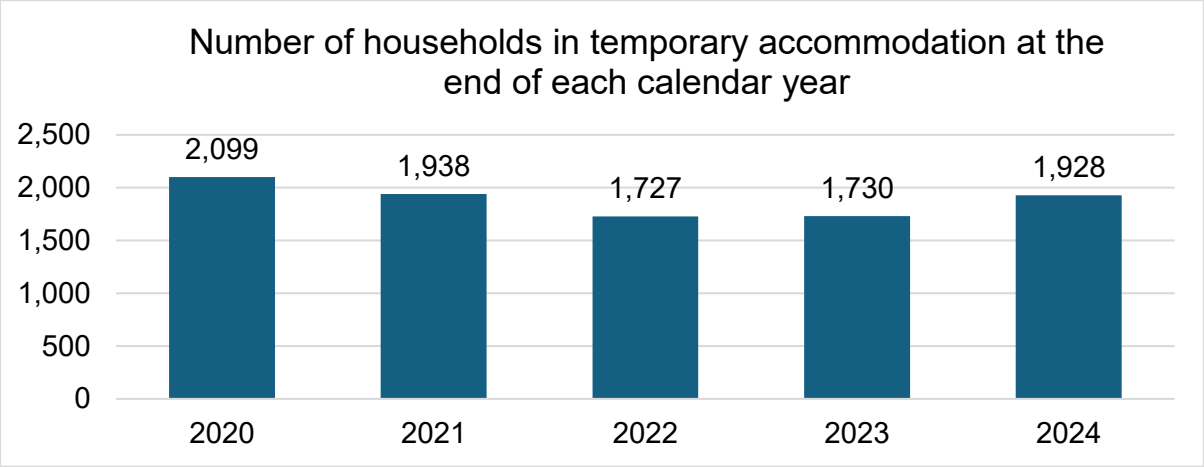


Source: Home Connections (data extracted 13 Jan 2025)

Households in temporary accommodation

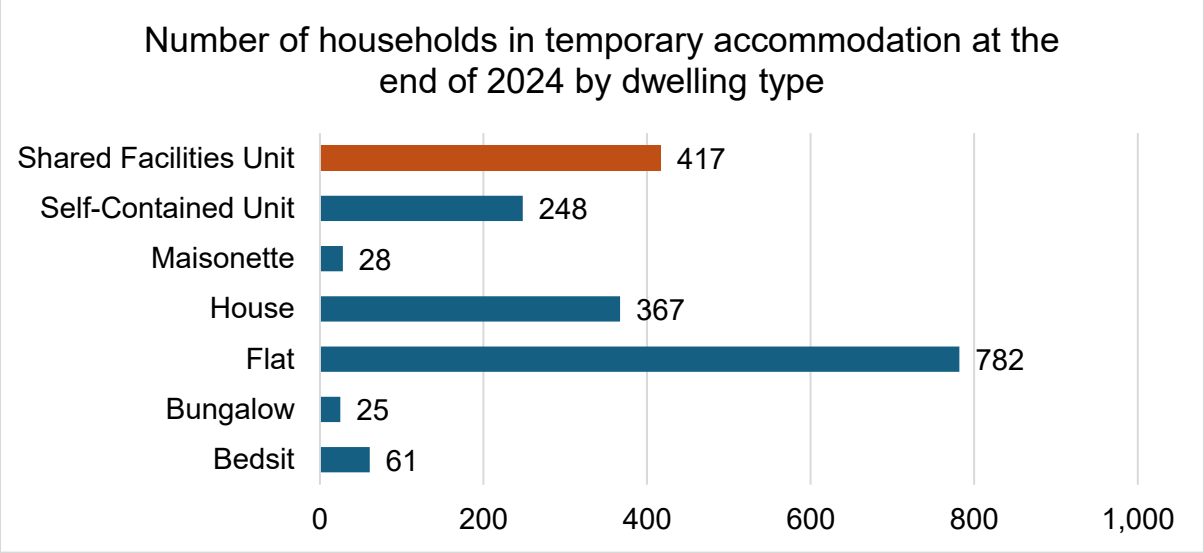
If there is no other accommodation available to a household owed a relief or main housing duty, placement in temporary accommodation by the council is often the only option. Temporary accommodation can include private rented housing, council owned properties, hostels and refuges as well as Houses in Multiple Occupation, B&Bs or

hotels. Although there are fluctuations over time, around 1,900 households are living in temporary accommodation at any one time. The chart below shows that after a fall in the number of households living in temporary accommodation between 2020 and 2022, numbers rose in 2023 and 2024.



Source: NEC Housing (data extracted 31 Dec 2024)

The chart below shows the number of households living in temporary accommodation by type of dwelling. All dwelling types have their own washing and cooking facilities apart from those categorised as a 'Shared Facilities Unit'. Most of these are rooms in B&B and hotels. At the end of 2024, 22% of households were in shared facilities accommodation (417 of 1,928) and 78% were in self-contained accommodation (1,511 of 1,928).



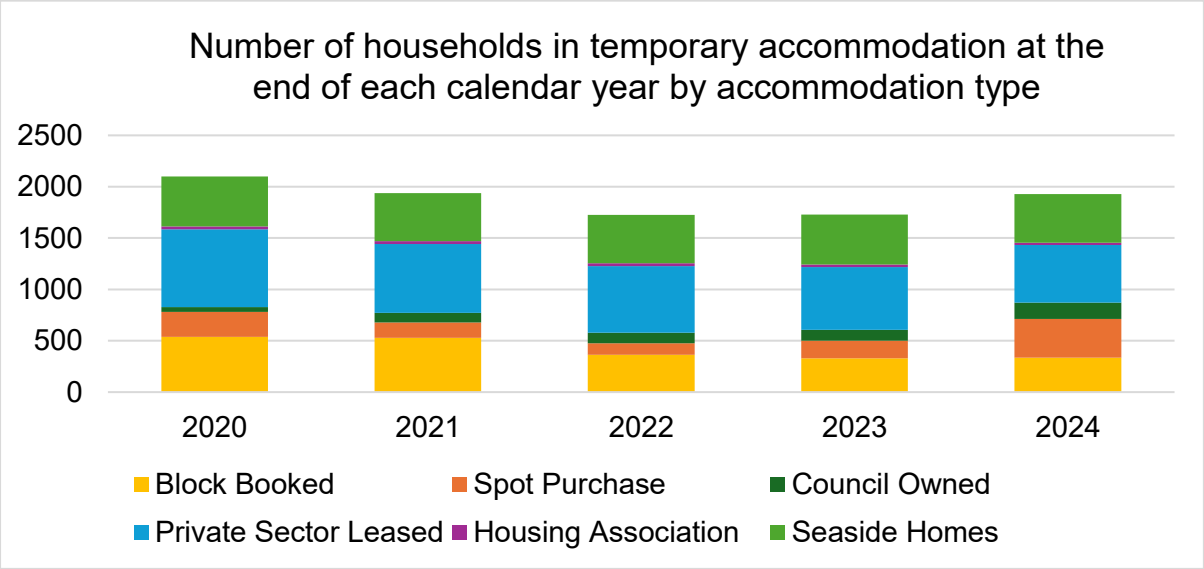
Source: NEC Housing (data extracted 31 Dec 2024)

Broadly speaking, temporary accommodation falls into two categories. The first, historically termed 'emergency accommodation', involves interim placement to meet immediate housing needs while a homelessness application is assessed. In the main, these placements are made using two forms of accommodation; block-booked, where

units are secured for a fixed period, and spot-purchased, where units are procured in real time on a nightly basis. Spot purchased accommodation is generally the most expensive form of temporary accommodation and often involves placement in hotels, B&Bs or Houses in Multiple Occupation.

Once people are assessed to be owed a housing duty they can be placed in longer term temporary accommodation where they may stay until they secure permanent rehousing. This type of temporary accommodation usually involves use of council owned accommodation or accommodation supplied through longer terms deals with private landlords.

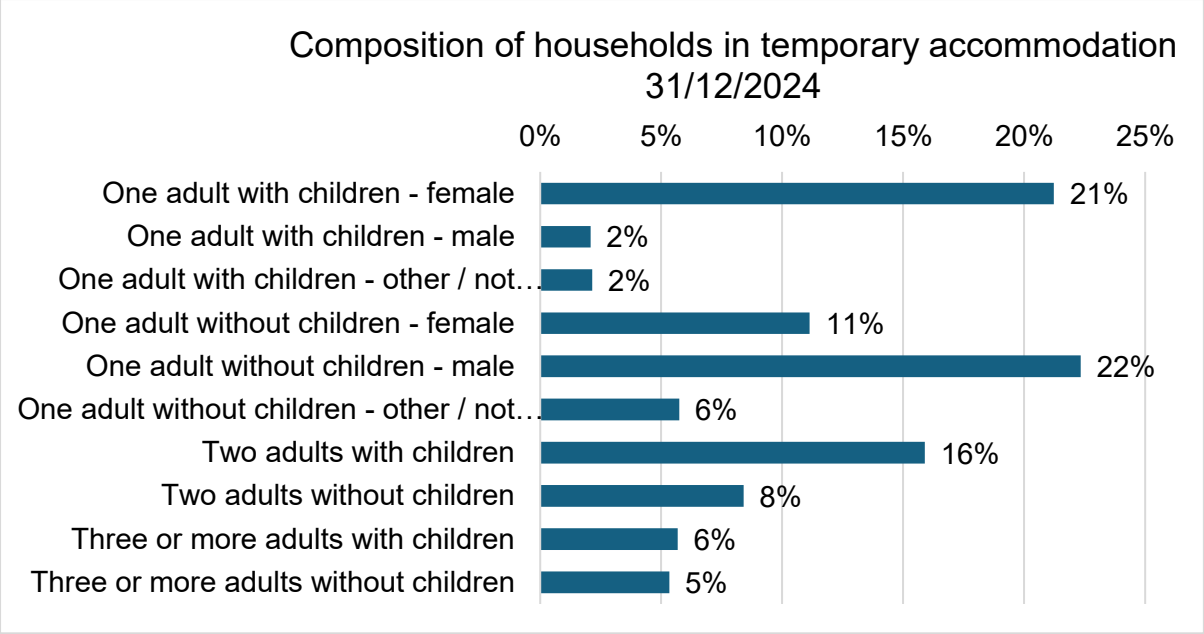
The chart below shows the use of different accommodation types by the council over the last 5 years. After a fall in the number of households placed in 'spot purchased' accommodation, the use of spot purchased temporary accommodation rose in 2023 and 2024.



Source: NEC Housing (data extracted 31 Dec 2024)

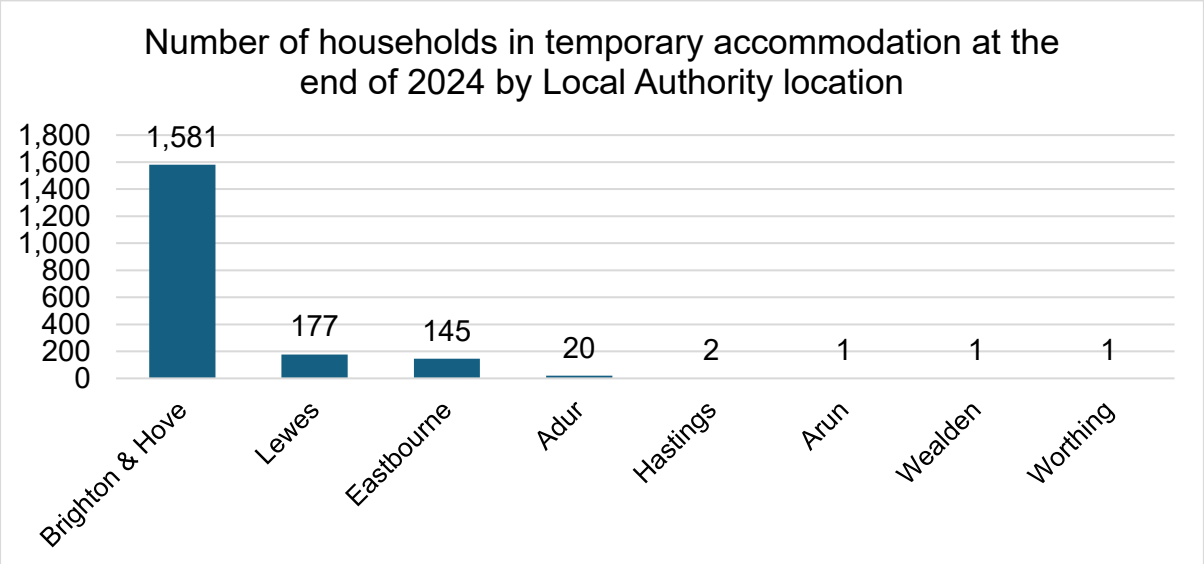
The increasing cost pressures associated with temporary accommodation are discussed in more detail in the Resources chapter.

The chart below shows the proportion of households in temporary accommodation by household composition at the end of 2024. At that point 47% of households living in temporary accommodation contained children. Just under half of these consisted of a single female with children. Single male households made up 22% of households in temporary accommodation.



Source: Home Connections (data extracted 10 March 2025)

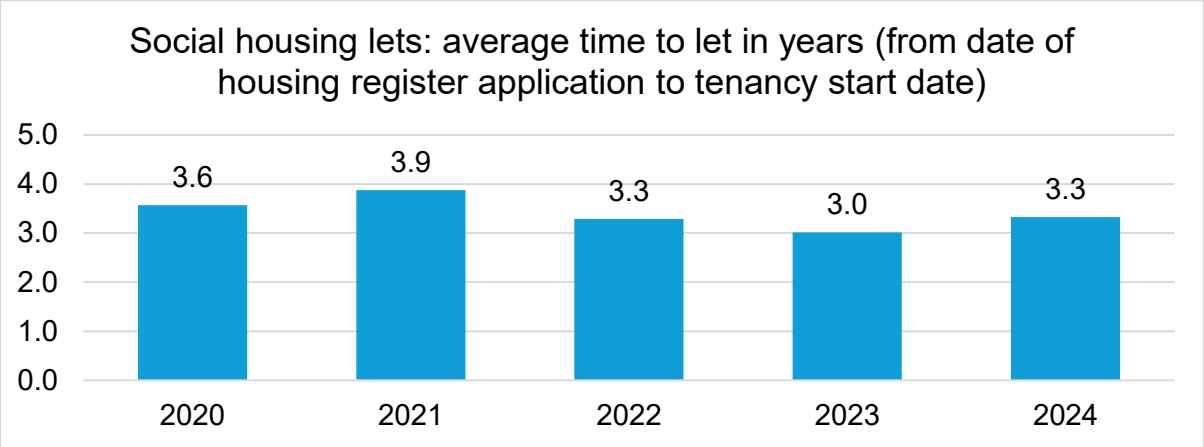
The chart below shows the location of placements for those living in temporary accommodation sourced by the council. Most households are placed in temporary accommodation in the city, but some are placed outside Brighton & Hove. This can be because there was no suitable accommodation available within the city, on grounds of safety or for other reasons. Of the 1,928 households living in temporary accommodation at the end of 2024, 1,581 (82%) were placed within the city, with 322 (16.7%) households placed in either Lewes or Eastbourne districts. Smaller numbers were placed elsewhere in East or West Sussex.



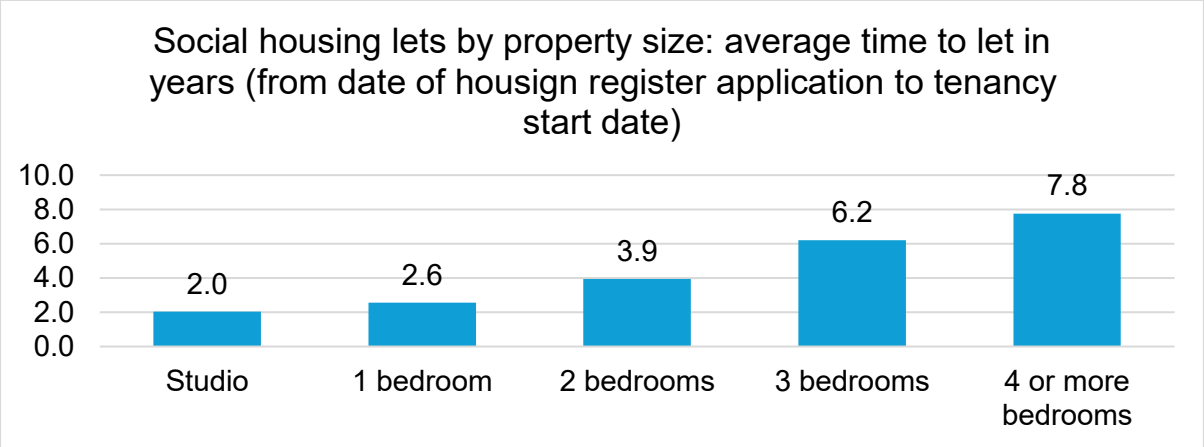
Source: NEC Housing (data extracted 31 Dec 2024)

Access to settled housing

As noted above, there is an acute shortage of social and private rented sector accommodation in the city. The charts below show the average waits for social housing and the average waits for different type of property. The average waiting time for social housing is around 3.4 years. The wait for a one-bedroom property is 2.6 years. For larger properties, suitable for families with children, the waiting time is much longer. The average wait for a 3-bedroom social rented property is 6.2 years.



Source: Home Connections (data extracted 13 Jan 2025)



Source: Home Connections (data extracted 13 Jan 2025)

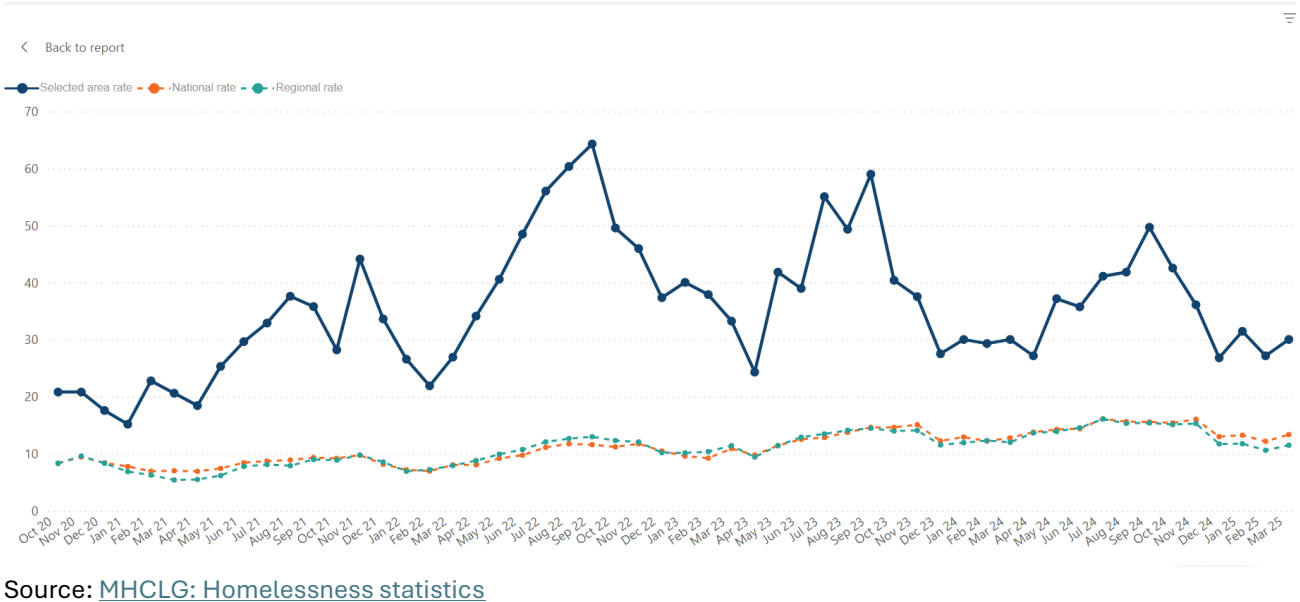
Rough sleeping

For the purposes of data collection, people sleeping rough are defined as people sleeping, about to bed down or bedded down in the open air (such as on the street, in tents, doorways, parks, bus shelters or encampments). The definition includes people in buildings or other places not designed for habitation (such as stairwells, barns, sheds, car parks, cars, derelict boats, stations or makeshift shelters. The definition of rough sleeping does not include people in hostels or shelters, people in campsites or other sites used for recreational purposes or organised protest, squatters, or travellers.

A snapshot of the number of people sleeping rough on a single night in November is captured as part of a national return each year. The figure for Brighton & Hove for 1 night in November 2024 was 76. The figure each year fluctuates widely with the lowest number recorded in 2010 (n=14) and the highest in 2017 (n=178). Although this figure is widely reported, it is probably not a reliable guide to trends in rough sleeping over time.

More detailed information on rough sleeping is recorded locally and reported as part of the national rough sleeping data framework.[5] This uses more frequent and more detailed information about people sleeping rough to capture the dynamic nature of rough sleeping and better understand the flow of people onto and off the street over the course of a month.

The chart below shows the monthly rates of rough sleeping between October 2020 and March 2025 for Brighton & Hove, the South East and England. An estimated 84 people slept rough in Brighton & Hove during the month of March 2025[6] This is a rate of 30.0 per 100,000 people, significantly higher than the average for the South East (11.5) and England (13.38). Alongside Portsmouth, Brighton & Hove had the joint 19th highest rough sleeping rate in England. In the South East region, only Eastbourne (30.1), Hastings (45.1) and Reading (46.0) had higher rates. Although the rate of rough sleeping in the city fluctuates, the overall trend is rising in line with national and regional averages, with a rate of 20.0 per 100,000 for Brighton & Hove in October 2020.

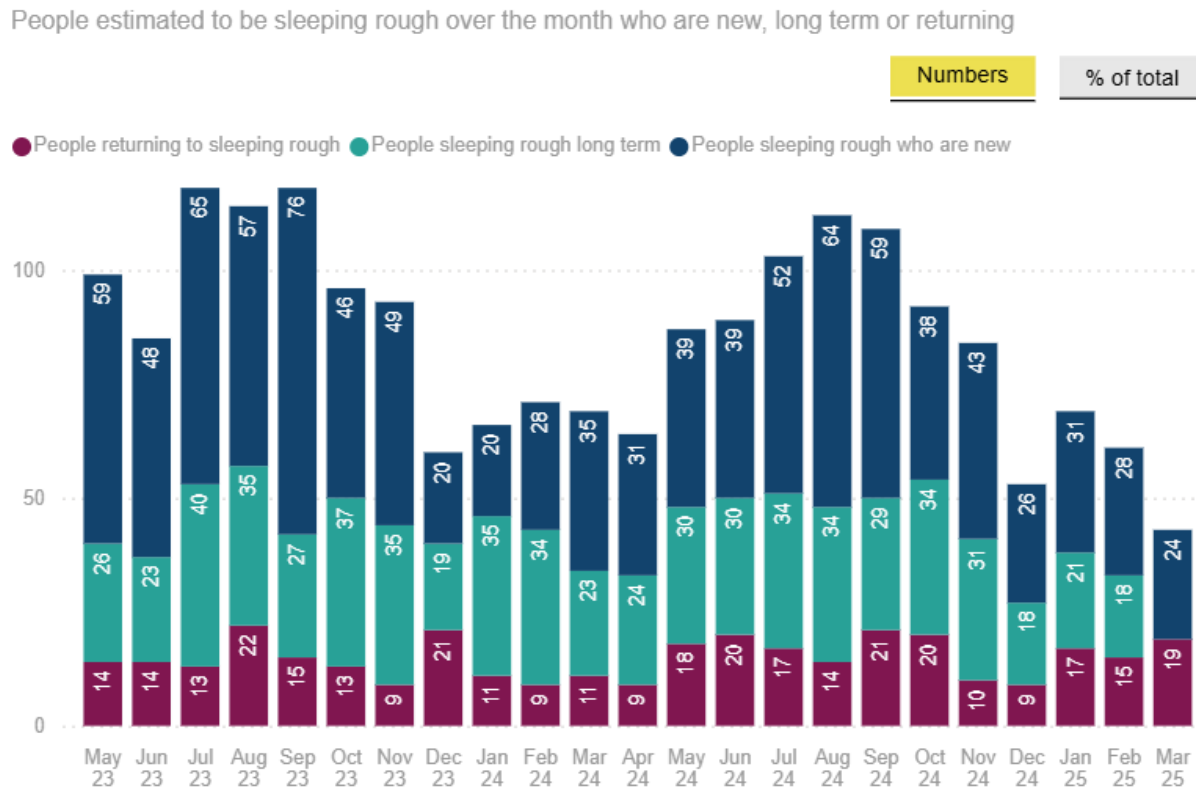


Source: MHCLG: Homelessness statistics

During the month of March 2025, 6 people sleeping rough had left an institution or were care leavers under 25.

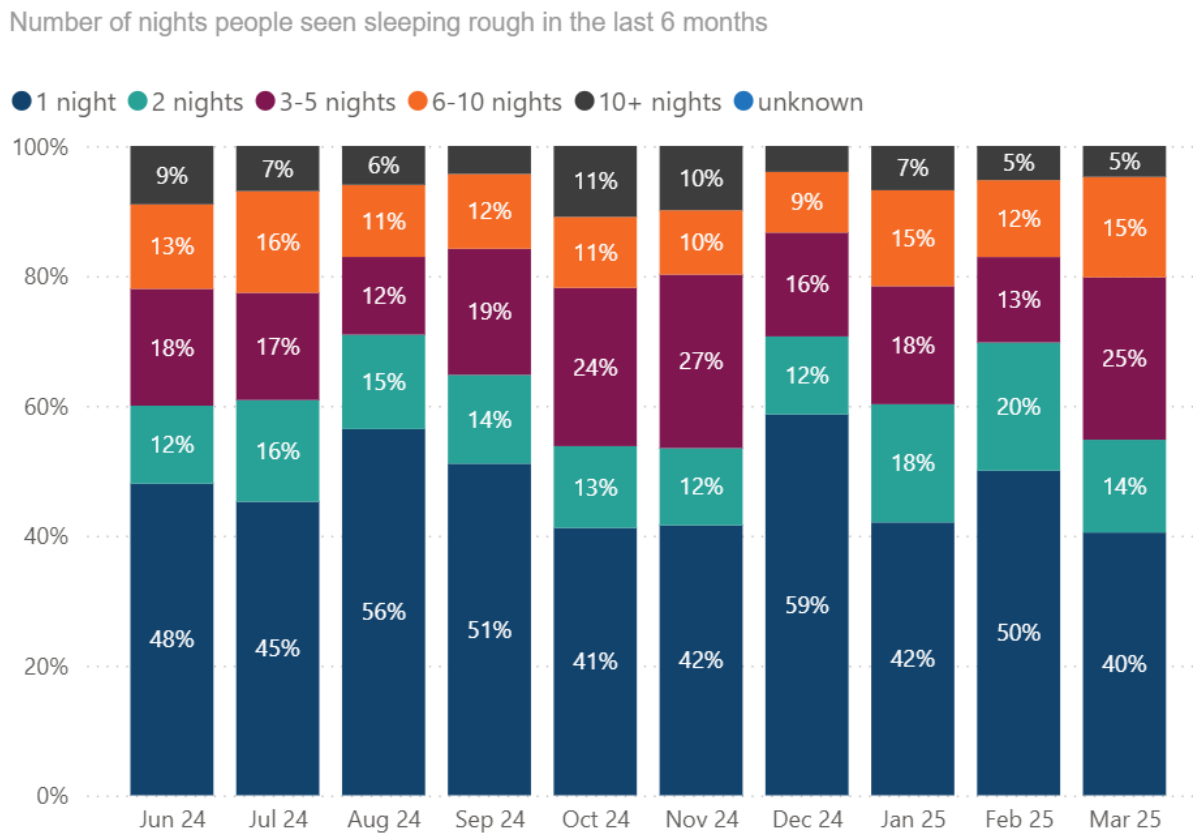
[5] Ministry of Housing, Communities and Local Government
https://www.gov.uk/government/collections/homelessness-statistics
[6] *Ibid.*

Of those sleeping rough in March 2025, 29% were new to rough sleeping (24 of 84). In that month, just under 23% of those sleeping rough were returning to rough sleeping (19 of 84). The chart below shows the number of people sleeping rough who are new, long term or returning to sleeping rough. Although numbers fluctuate, the average number of people per month sleeping rough who were sleeping rough long term between May 2023 and March 2025 was 24.



Source: MHCLG: Homelessness statistics

During the month of March 2025, 40% of people were seen sleeping rough on 1 night, with 5% sleeping rough for more than 10 nights. The chart below shows the proportion of those sleeping rough for 1 night or more in the last 6 months.



Source: MHCLG: Homelessness statistics

The annual snapshot captures data on age, gender and nationality, something not available from the monthly rough sleeping data. Of the 76 people sleeping rough on 1 night in November 2024, 3 (3.9%) were aged 18-25, 70 (92.1%) were 26 and over, (age was not recorded for 3 people). There were no children under 18 years old. Most people sleeping rough were men, with 69 (90.8%) recorded as male and 5 (6.6%) were recorded as female (gender was not captured for 2 people). Nationality was captured for 70 of the 76 people sleeping rough, with 48 (63.1%) recorded as UK nationality, 9 (11.8%) EU nationals, and 13 (17.1%) non-EU nationals.

Hidden homelessness

The number of households experiencing homelessness is likely to be higher than council and national data shows. Some people do not approach the council for help and there is no consistent or agreed way of capturing the number of those who are experiencing homelessness but who are not recorded in the official figures. The Office for National Statistics is working to address the challenge of quantifying levels of

hidden homelessness.[7] They concluded that 'the available evidence suggests some population groups, such as women, young people and ethnic minority groups, are more likely to experience "hidden" homelessness than others'.[8]

In 2024, Change Grow Live and Brighton & Hove City Council contributed to the third national women's rough sleeping census.[9] The census looks at women who have 'nowhere safe to stay' rather than just those sleeping rough according to the official definition. The census findings show that women are significantly underrepresented in the official snapshot figures both locally and nationally. The report argues that a lack of visibility means that women are less able to access services and accommodation, and that current policies, strategies and funding models do not recognise or address the true scale and nature of women's rough sleeping.

Findings from the national women's rough sleeping census indicate that rough sleeping is rarely a standalone experience for women. Most of them oscillate between rough sleeping and other forms of homelessness, meaning that traditional approaches to addressing rough sleeping and statutory homelessness may be less effective for women without children in their care.

Who experiences homelessness?

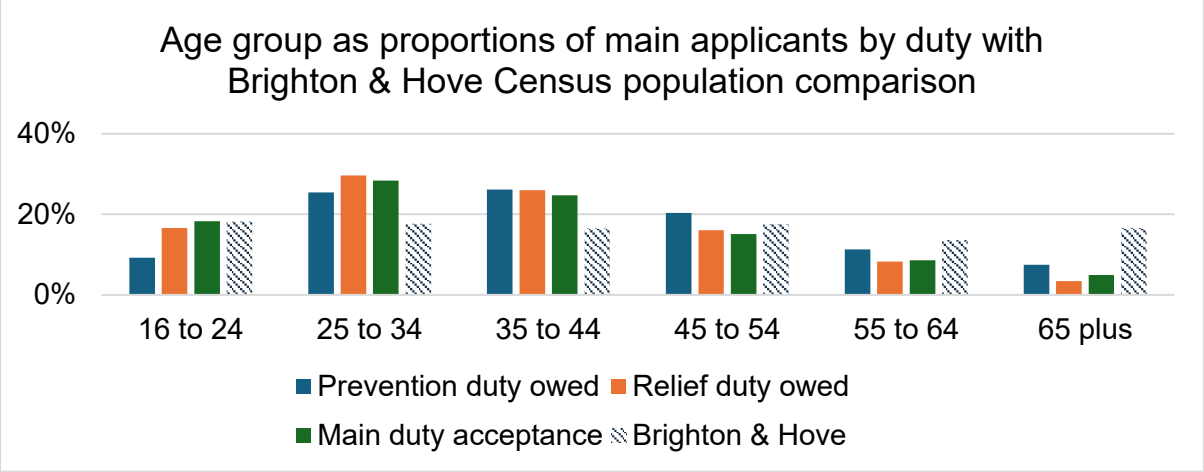
Although homelessness can affect anyone, council data shows that certain groups are more at risk of experiencing homelessness compared with the city's population as a whole. The numbers and proportions given below relate to the period 2020 to 2024.

The chart below shows the age group of main applicants compared with the city population. Between 2020 and 2024, people aged between 25 and 44 were significantly over-represented amongst those owed a prevention, relief or main housing duty compared to the city's population. People over 55 were under-represented.

[7] Office for National Statistics, 2023, *"Hidden" homelessness in the UK: evidence review* https://www.ons.gov.uk/peoplepopulationandcommunity/housing/articles/hiddenhomelessnessintheukevidencereview/2023-03-29

[8] Ibid. p.2

[9] Solace, 2024, *How do we sleep at night? Women's rough sleeping census 2024* https://www.solacewomensaid.org/womens-rough-sleeping-census/



Source: Home Connections (data extracted 13 Jan 2025)

Children (aged 0-17) are usually part of households where the main applicant is an adult. This means that they are not captured in the time series data on main applicants (with the exception of 16-17 year olds where they are the main applicant). Data on the numbers of children in temporary accommodation is only available from 31 March 2024, so it is not possible to identify a trend in numbers. From the data we do have, it is clear that children are significantly over-represented amongst those experiencing homelessness in the city. Shelter estimated that there were 1,411 children in Brighton & Hove experiencing homelessness on 30 June 2024. This figure was 39.4% of the 3,580 people they estimated to be experiencing homelessness on that date.[10] At the Census 2021 children made up 17.1% of the city's population.

47% of the households living in temporary accommodation at the end of December 2024 had children. The rate of households with children living in temporary accommodation in Brighton & Hove was 5.73 per 1000 households. This is higher than the national rate of 3.5 per 1000 households.

National evidence indicates that homeless young people may be underrepresented in official statistics.[11] The table below shows the number of main applicants aged 16 to 24 at time of application. While the number assessed as owed a prevention or relief duty have remained broadly stable over the last 5 years, the number accepted as owed a main housing duty has more than doubled.

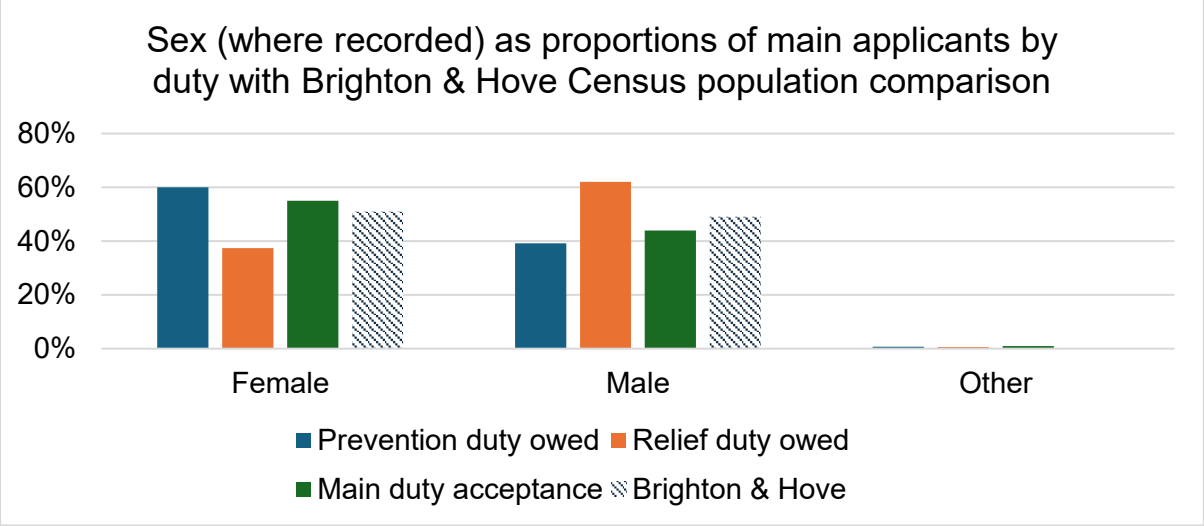
[10] Shelter, 2024, *At least 354,000 people homeless in England today* https://england.shelter.org.uk/media/press_release/at_least_354000_people_homeless_in_england_today_

[11] Office for National Statistics, 2023, *"Hidden" homelessness in the UK: evidence review* https://www.ons.gov.uk/peoplepopulationandcommunity/housing/articles/hiddenhomelessnessintheukevidencereview/2023-03-29

Number of main applicants aged 16 to 24 per year	Prevention duty owed	Relief duty owed	Main duty acceptance
2020	50	231	52
2021	27	175	48
2022	41	174	98
2023	58	172	89
2024	79	203	116

Home Connections (data extracted 13 Jan 2025)

The chart below shows recorded sex of main applicants by duty compared with the population of the city. Women comprised 51% of the population at the 2021 Census. Between 2020 and 2024, women made up 60% of those owed a prevention duty, 37% of those owed a relief duty and 55% of those owed the main housing duty. A greater proportion of men (62% compared with 49% of the city's population) were owed a relief duty by the council.[12]

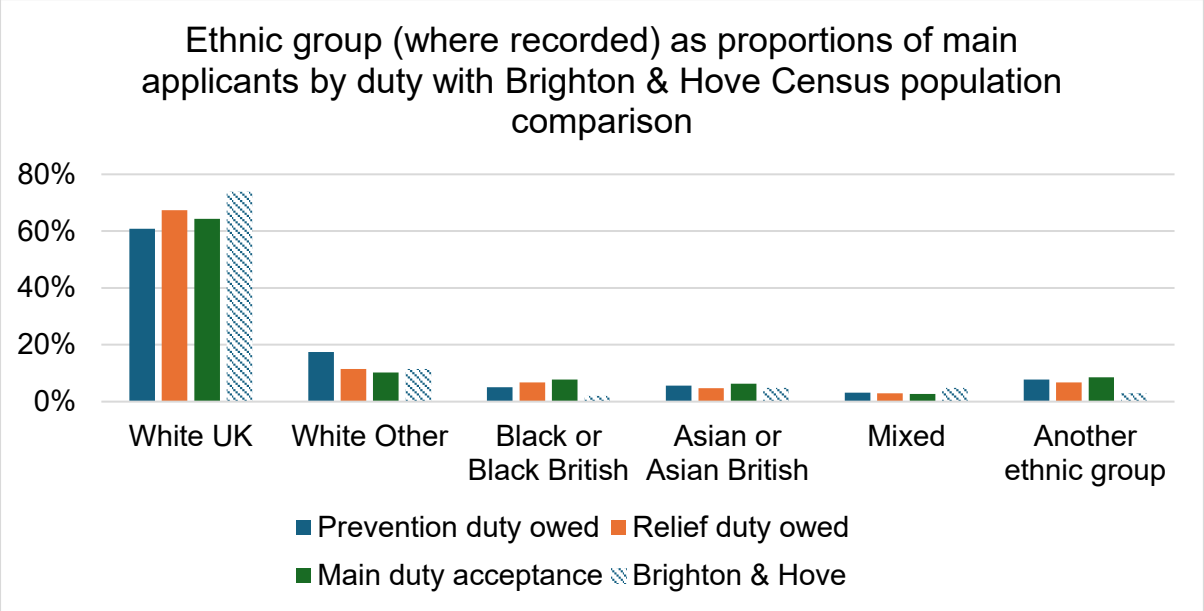


Source: Home Connections (data extracted 13 Jan 2025)

Gender identity refers to a person's sense of their own gender, whether male, female or another category such as non-binary. This may or may not be the same as their sex registered at birth. Data is collected by the council on gender identity using the question 'Is your gender the same as the sex you were registered at birth?'[13] The number of people who responded to this question is low. Between 2020 and 2024, of those who answered the question, 26 were owed a prevention duty, 71 were owed a relief duty, and 35 were owed a main housing duty.

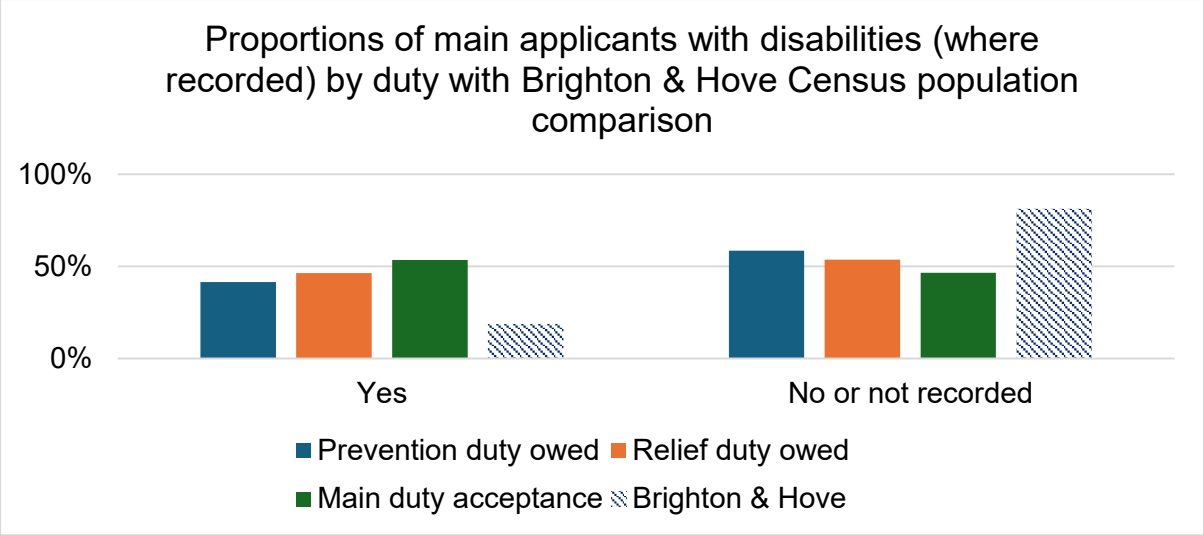
[12] Both the council's data recording system and the UK Census 2021 ask, 'What is your sex?'. The target concept of the question in the Census is sex as recorded on legal/official documents.
[13] This is similar to the UK Census 2021 question 'Is the gender you identify with the same as your sex registered at birth?'

The chart below shows ethnic group of main applicants as proportions compared with the overall population of Brighton & Hove by duty owed. Between 2020 and 2024, people of White UK ethnic background made up 61% of those owed a prevention duty, 67% of those owed a relief duty, and 64% of those owed the main housing duty. This group comprises 71% of the population of the city at the 2021 Census. People from White Other ethnic groups were over-represented amongst those owed a prevention duty compared to the city's population (17% compared to 12%). People from Black and Black British ethnic backgrounds are overrepresented amongst those owed all three duties by the council. These ethnic groups comprise 2% of the population of the city but 5% of those owed a prevention duty, 7% of those owed a relief duty and 8% of those owed a main housing duty.



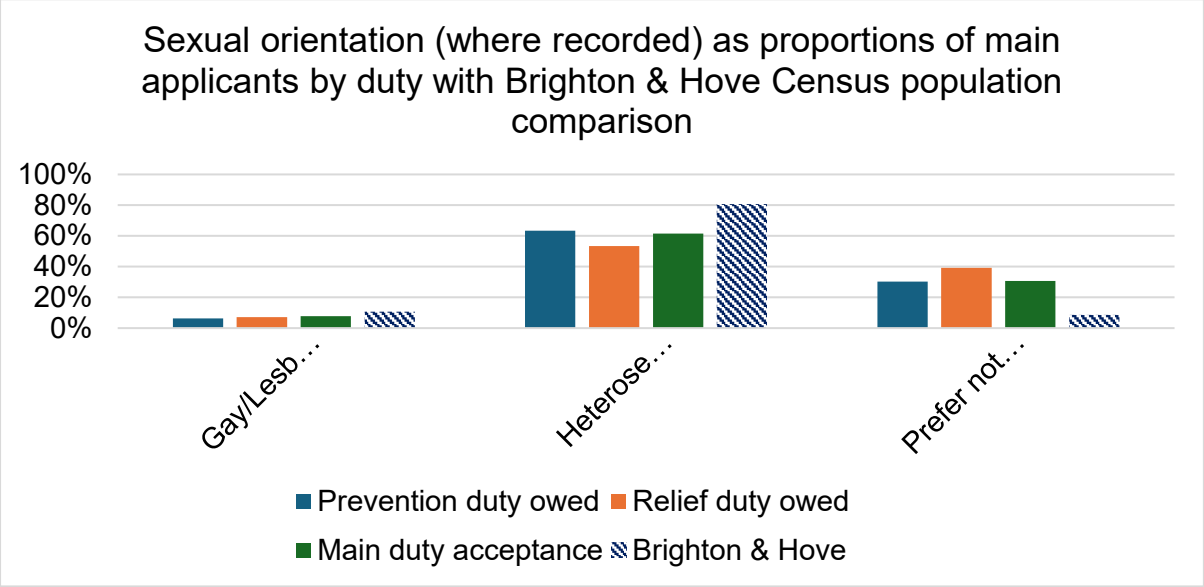
Source: Home Connections (data extracted 13 Jan 2025)

The chart below shows the proportions of main applicants recorded as having disability related support needs compared with the overall population of Brighton & Hove by duty owed. This includes people with physical ill health or disability, people with a history of mental health problems and people with learning disabilities. Disabled people comprised 19% of the city's population at the 2021 Census. Disabled people are significantly overrepresented amongst those owed all 3 duties. Between 2020 and 2024, disabled people made up 42% of those owed a prevention duty, 46% of those owed a relief duty, and 54% of those owed a main housing duty.



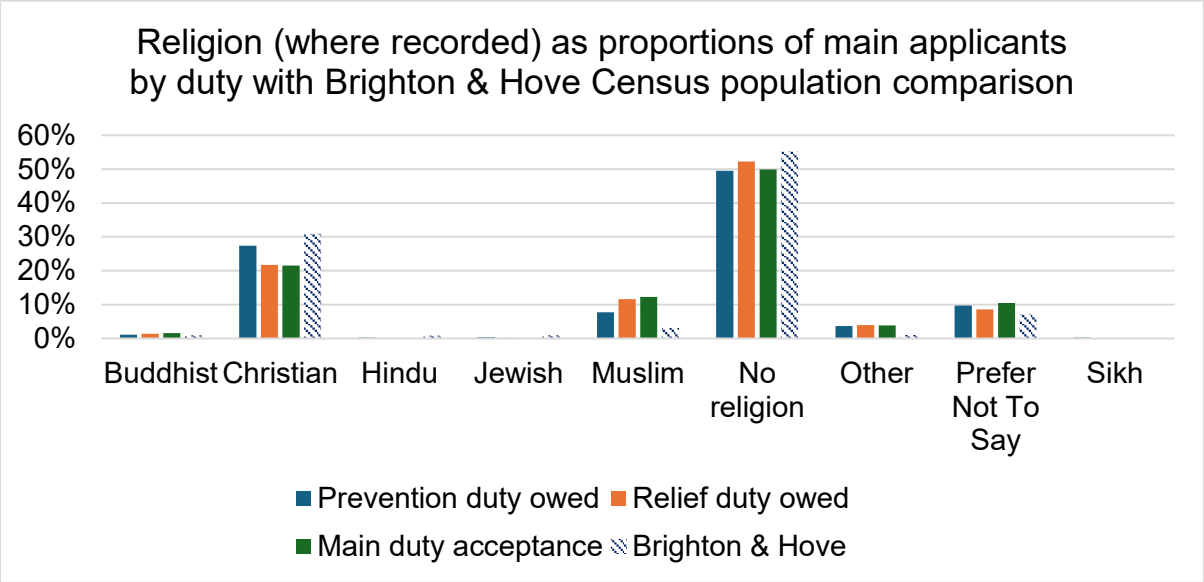
Source: Home Connections (data extracted 13 Jan 2025)

The chart below shows the proportions of recorded sexual orientation of main applicants by housing duty. Between 2020 and 2024, people who identified as Lesbian, Gay, Bisexual or Other sexual orientation assessed as owed a housing duty were underrepresented compared to the population of the city as a whole. They made up of 6% of those owed a prevention duty, 7% of those owed a relief duty, and 8% of those owed a main housing duty. People recorded as Lesbian, Gay, Bisexual or Other sexual orientation comprised 11% of the city's population at the 2021 Census.



Source: Home Connections (data extracted 13 Jan 2025)

The chart below shows the recorded religion of main applicants by housing duty. People whose religion was recorded as Muslim were significantly overrepresented. They made up 8% of those owed a prevention duty, 12% of those a relief duty and 12% of those owed a main housing duty. People recorded as Muslim comprised 3% of the population of the city at the 2021 Census.



Source: Home Connections (data extracted 13 Jan 2025)

The numbers and proportions of people owed a duty who are at risk of or who have experienced domestic abuse, sexual abuse or who are victims of modern slavery can be found in the tables on support needs in the next section. In 2024, 6% of those owed a prevention duty, 12% of those owed a relief duty and 16% of those owed a main duty were at risk of or had experience domestic abuse.

The table below shows the employment status of the main applicant over 5 years from 2020 to 2024. For all 3 housing duties a significant proportion of applicants were either registered unemployed or not working because of long term sickness or disability.

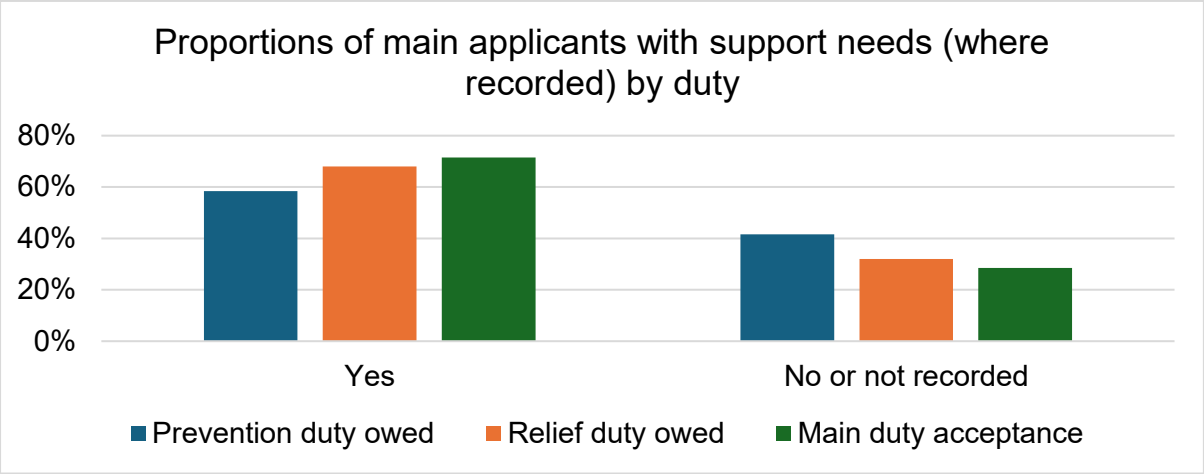
Employment status of main applicant	Prevention duty owed	Relief duty owed	Main duty acceptance
At home/not seeking work (including looking after the home or family)	5%	3%	7%
Don't know / Refused	4%	9%	5%
Full-time student	1%	1%	1%
Not registered unemployed but seeking work	2%	3%	2%
Not working because of long term sickness or disability	21%	24%	26%
Other	1%	2%	1%
Registered employed but currently off work due to ill health / disability on reduced or SSP	1%	1%	1%
Registered employed but currently off work on maternity/paternity/adoption leave on reduced or statutory pay	1%	0%	1%
Registered unemployed	25%	39%	31%
Retired (including retired early)	5%	2%	4%
Training Scheme / apprenticeship	0%	0%	0%
Working: 30 hours a week or more (contracted, regular or guaranteed)	13%	6%	7%
Working: irregular hours with variable or irregular pay	2%	1%	1%
Working: less than 30 hours a week (contracted, regular or guaranteed)	17%	6%	11%
Not recorded	2%	2%	2%

Source: NEC Housing (data extracted 31 Dec 2024)

Data on other characteristics, including protected characteristics, are recorded as support needs in the section below. Whilst some characteristics are in themselves predictive of risk or vulnerability, it is clear that these characteristics intersect with each other and with life events such as loss of employment, relationship breakdown or ill health to heighten risk and vulnerability.

Support needs of people experiencing homelessness

Of those assessed as owed a housing duty by the council, most had one or more support needs. Support needs were recorded for 58% of those owed a prevention duty, 68% of those owed a relief duty and 71% of those owed a main duty.



Source: Home Connections (data extracted 13 Jan 2025)

The table on the next page shows the recorded support needs of main applicant in households owed a housing duty by the council in 2024. Applicants may have more than one support need, so these categories overlap. For those households owed a relief duty, and therefore likely to be placed in temporary accommodation, the 5 most common support needs were 'history of mental health problems' (35% of those owed a relief duty), 'physical ill health and disability' (22%), 'drug dependency needs' (12%), 'At risk of/has experienced domestic abuse' (12%) and 'Alcohol dependency needs' (10%). The support needs of other members of the household are not recorded.

Support needs (overlapping categories)	Prevention duty owed	Relief duty owed	Main duty accepted
Access to education, employment or training	87	96	30
Alcohol dependency needs	100	574	148
At risk of/has experienced abuse (non-domestic abuse)	53	224	95
At risk of/has experienced domestic abuse	170	707	351
At risk of/has experienced sexual abuse/exploitation	51	199	78
Care leaver aged 18-20 years	8	72	33
Care leaver aged 21+ years (Retired)	8	74	20
Difficulties budgeting	187	133	55
Drug dependency needs	115	717	160
Former asylum seeker	58	163	72
History of mental health problems	737	2,020	816
History of repeat homelessness	81	515	104
History of rough sleeping	46	500	75
Learning disability	109	266	121
Offending history	73	605	118
Old age	95	74	43
Physical ill health and disability	628	1,238	659
Served in HM Forces	3	18	3
Victim of modern slavery	8	21	7
Young parent requiring support to manage independently	20	47	35
Young person aged 16-17 years	8	14	4
Young person aged 18-25 years requiring support to manage independently	74	278	111

Source: Home Connections (data extracted 13 Jan 2025)

Health and homelessness

Ill health can be both a cause and a consequence of homelessness. We know from national research that people experiencing homelessness have poorer physical and mental health than the general population.[14] Avoidable and unfair differences in health are more likely the longer a person experiences homelessness. Experiencing homelessness also impacts how people access health services. Health inequalities between those experiencing homelessness and the general population are due to a range of systemic, social, practical and administrative barriers.

[14] Homeless Link, 2022, *Unhealthy State of Homelessness 2022* https://homeless.org.uk/knowledge-hub/unhealthy-state-of-homelessness-2022-findings-from-the-homeless-health-needs-audit/

Homeless Link, in their 2021 national survey of 2,776 people experiencing homelessness, found that:

- 63% had a long-term illness, disability or infirmity
- 82% had a mental health diagnosis
- 45% reported self-medication with drugs or alcohol to help them cope
- 97% reported registration with a GP or homeless healthcare centre
- 53% were registered with a dentist
- 48% reported use of A&E services in the last year - three times more than the general population
- 38% had been admitted to hospital in the past 12 months
- 37% of hospital admissions related to a physical health condition, and 28% related to a mental health condition, self-harm or attempted suicide
- Of those admitted to hospital nearly a quarter (24%) had been discharged to the streets
- 33% of respondents reported that on average they eat only one meal a day

A review by the Local Government Association reported that a third of those sleeping rough are not registered with a GP and have an Accident and Emergency attendance rate eight times higher than the general population.[15]

National data from the Office for National Statistics indicate that in 2021 there were an estimated 741 deaths of people experiencing homelessness in England and Wales.[16] Most of these deaths occurred in men (87.3%). Almost 2 in 5 deaths (35%) in people experiencing homelessness were related to drug poisoning. There were an estimated 99 suicide deaths and 71 alcohol-specific deaths, accounting for 13.4% and 9.6% of deaths respectively. The average age of death for men in this cohort was 45 years and 43 years for women. This is compared to 77 years for men and 81 years for women in the general population.

The last comprehensive audit of the health needs of people experiencing homelessness in Brighton & Hove was undertaken in 2014.[17] The sources cited below contain more recent data and evidence.

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[15] Local Government Association, 2017, *The Impact of Homelessness on Health: A Guide for Local Authorities*
https://www.local.gov.uk/sites/default/files/documents/22.7%20HEALTH%20AND%20HOMELESSNESS_v08_WEB_0.PDF

[16] Office for National Statistics, Deaths of homeless people in England and Wales: 2021 registrations
https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/deaths/bulletins/deathsofhomelesspeopleinenglandandwales/2021registrations

[17] Brighton & Hove City Council, 2014, *Brighton & Hove Homeless Health Needs Audit*
https://www.brighton-hove.gov.uk/files/sites/bhconnected/files/Brighton%20and%20Hove%20Homeless%20Health%20Needs%20Audit%20FINAL.pdf

The Health Counts 2024 survey was conducted by Brighton & Hove City Council and the University of Brighton. Of the 16,729 people who responded, 0.9% (n = 161) reported living in temporary or emergency accommodation. Examples given in the survey of 'temporary or emergency accommodation' included 'shelter, sofa surfing, and bed & breakfast accommodation'. Trend data are not available.

Health Counts data shows that there are significant health inequalities across a broad range of health and social issues affecting people living in temporary accommodation. The report found that those living in temporary and emergency accommodation were less likely to report being in good health than the population of the city overall. They were more likely to report poor mental health and unhealthy lifestyle behaviours. They were also more likely to report being fairly or very worried about their housing conditions (including damp, cold and leaks) and feeling unsafe or unsupported in their homes and local area when compared with the general population.

The table below shows that those living in temporary or emergency accommodation were more likely to report a range of issues indicating poor health and less likely to report factors that protect health. The % figures are for temporary and emergency accommodation compared with the general population.

Health and disability	Lifestyle	Safety and social support
•be a **disabled** adult (67% vs. 37%) •report **anxiety** (72% vs. 38%) •have **self-harmed** in the last 12 months (20% vs. 9%) •have **thought of taking their own life** in the past 12 months, even though they wouldn't actually do it (48% vs. 25%) or have ever **made an attempt to take their own life** (24% vs. 12%) •**never visit the dentist** (29% vs. 10%)	•**smoke** (47% vs. 17%) •**binge drink** daily or almost daily (7.3% vs. 2.4%) •to have **used drugs** that were not prescribed for them and were not available at a chemist/pharmacy in the last year (35% vs. 20%) •experience **gambling** related harm (62% vs. 19%) •have done **less than 30 minutes of sport or fitness activity** in the last week which raised their breathing rate (64% vs. 53%)	•feel very or a bit **unsafe** at night (60% vs. 34%) •feel very or fairly **worried about physical violence** against themselves (36% vs. 22%) •to be fairly or very **worried about housing conditions** such as damp, cold and leaks (56% vs. 21%) •to be fairly or very **worried about being sexually assaulted/ raped** (34% vs. 21%

Health and disability	Lifestyle	Safety and social support
•report being **in good or better health** (33% vs. 69%) •**clean their teeth** twice a day (or more) (66% vs. 75%)	•eat five or more portions of **fruits or vegetables** (37% vs 49%) •spend **free time in nature** at least monthly (79% vs 89%)	•have a very or fairly strong **feeling of belonging** to their local area (35% vs. 53%) •**if ill in bed and need help, have someone they could ask** (51% vs. 70%) •feel very or fairly **satisfied with the local area** as a place to live (55% vs. 81%)

The Brighton & Hove Multiple Complex Needs JSNA 2020 reported particularly poor health outcomes in those experiencing homelessness with other compounding needs, particularly mental health needs and substance use issues. Changing Futures Sussex publish a quarterly audit of people with multiple compound needs in contact with homelessness and housing services in Brighton & Hove.[18] People with multiple compound needs experience some of the poorest health outcomes of any population group. The term multiple compound needs (MCN) is defined by the national Changing Futures programme as three or more of 'homelessness, substance misuse, mental health issues, domestic abuse, and contact with the criminal justice system'.[19]

The Q4 2024/25 audit report provides information about co-occurring needs alongside homelessness including mental and physical health, substance misuse, domestic abuse, history of offending and whether people are accessing support for their needs.[20]1909 individuals are represented in the audit of data supplied by 27 support providers. 37% clients (n = 704) were experiencing homelessness. Of this group:

- 88% were experiencing mental health needs
- 77% were experiencing substance use issues
- 53% had historic or current involvement in the criminal justice system
- 44% had a physical health need
- 31% were affected by domestic abuse
- 59% were homeless with 2 other needs; 33% were homeless with 3 other needs; and 8% were homeless with 4 other needs
- Most were male (67%), White British and aged between 35-44 years
- 88% were registered with a GP

A 2025 internal audit of deaths in temporary and supported housing conducted by Brighton & Hove City Council found that most deaths were due to overdose, cardiac arrest, suicide and chronic illness, with an average age at death of 48 years.

An audit of drug deaths in the city in 2024 found that many of those who died experienced multiple compound needs as well as unemployment, poor or insecure housing, insecure or unstable income, financial difficulties, or poor family or social support networks.[21] In the 12 months prior to death, 50% had experienced significant changes in their housing situation – including eviction, concerns regarding cuckooing, prison release, moving to and from Brighton & Hove or moving into student

[18] Changing Futures Sussex, *Brighton & Hove Multiple Needs Audit Reports,* https://www.changingfuturessussex.org/learning

[19] Ministry of Housing, Communities and Local Government, *Changing Futures: changing systems to support adults experiencing multiple disadvantage,* 2020 https://www.gov.uk/government/publications/changing-futures-changing-systems-for-adults-experiencing-multiple-disadvantage

[20] Changing Futures Sussex, 2025, Multiple Needs Audit – Brighton & Hove: January – March 2025

[21] Brighton & Hove City Council, 2025, *Audit of Drug Deaths 2024*

accommodation. Twenty percent were homeless (living in supported, emergency or temporary accommodation, sofa surfing or sleeping rough). Over a third (36%) may have met the criteria for a referral to the Changing Futures programme.

Data from Arch Healthcare, a GP practice specialising in healthcare for people experiencing homelessness, indicates that of a practice population of around 1,600 patients:

- Most were male (79% male, 21% female)
- The mean age is 41.6 years
- 80.1% are White, 5% Mixed/Multiple ethnic groups, 4.6% Black/ African/ Caribbean/Black British; 2.8% Asian/Asian British; 2.8% Other ethnic group; 4.6% Unknown
- There are around 40 children registered with the practice
- 54% of patients were coded as having depression, 44% anxiety and 12% PTSD
- 20% were coded as having self-harmed (this is reportedly more common and may not always be coded)
- 28% of patients were coded for substance use, 26% alcohol dependence and 74% were smokers
- 8% were coded as having COPD, 2% Coronary Heart Disease, 8% hypertension, 3% Chronic Liver Disease, 4% have Type 2 Diabetes mellitus and 7% are coded as having chronic pain
- 1% of patients have a code for TB, 2% for HIV, 1% Hepatitis C and 1% Hepatitis B
- In 2024/25, there were 16,807 appointments, with 1,603 people seen and an average of 10.5 appointments per patient

Although this data provides insights, it should be interpreted with caution due to several limitations, including potential under-coding, patients in the dataset representing both those experiencing homelessness and those who have been subsequently housed. We were also unable to assess for comorbidity as the data are for individual counts.

Being frail describes when someone loses their inbuilt reserves and therefore becomes vulnerable to serious adverse outcomes from seemingly minor stressors, such as a move to short term residential placement or a trip to the emergency department.[22] There is a growing understanding that more people are becoming homeless in later life. Those experiencing homelessness, especially those with multiple compound needs or with a history of rough sleeping, can also experience frailty at a younger age.

In Brighton & Hove, work is being undertaken to improve the identification of frailty in people experiencing homelessness. The Homeless Health and Inclusion team use the Edmonton Frail Scale to identify those who are frail. The main components of frailty in

[22] British Geriatrics Society, 2014, *Introduction to Frailty* https://www.bgs.org.uk/introduction-to-frailty

this group relate to malnutrition and mobility issues. The team are then able to organise onward support. Support could include outreach, physiotherapy, occupational therapy, hospital admission avoidance and identifying those who may require end of life care. If frailty is not identified and if chronological age and other issues like substance use are focused upon, individuals are vulnerable to their needs not being adequately met, including being placed in less suitable accommodation. Quantitative data is not yet available from this work.

There is a lack of local data on the impact on homelessness on the health of children and young people. However, there is a growing body of national and international evidence indicating a serious negative impact on health and other outcomes. Evidence submitted to the Housing, Communities and Local Government Committee in 2024-25 identifies the following common issues for children living in temporary accommodation: overcrowding, poor maintenance, lack of adequate facilities (like a kitchen, laundry and personal hygiene facilities, a desk or table for homework) and serious hazards (damp and mould, excessive cold, pests).[23] Witnesses informed the select committee that poor quality accommodation can result in numerous health conditions including respiratory illness, skin problems, gastro-intestinal illness, high rates of accidents, sleep deprivation, depression and anxiety.

Analysis conducted on behalf of the All-Party Parliamentary Group on Temporary Accommodation by the Shared Health Foundation estimates that temporary accommodation has contributed to the deaths of at least 74 children in the last 5 years (58 of these were under 1 year old).[24]

Survey research by Shelter found that 61% of parents living in temporary accommodation felt that temporary accommodation had a negative impact on their children's stress or anxiety; 52% reported that their children's depression has worsened; and 28% said their children were finding it hard to make or keep friends due to living in temporary accommodation.[25] Almost half (47%) of children of those surveyed had to move schools. More than half (52%) of parents reported their children had missed days of school. Of these, more than one in three (37%) have missed more than one month. One in four (26%) parents said their children were unable to keep up or have performed poorly because of living in temporary accommodation.

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[23] UK Parliament, House of Commons: Housing, Communities and Local Government Committee, 2025, *England's Homeless Children: The crisis in temporary accommodation* https://publications.parliament.uk/pa/cm5901/cmselect/cmcomloc/338/report.html#heading-0

[24] All Party Parliamentary Group: Households in Temporary Accommodation, 2025, Child *Mortality in Temporary Accommodation 2025* https://sharedhealthfoundation.org.uk/publications/child-mortality-in-temporary-accommodation-2025/

[25] Shelter, 2022, *Still Living in Limbo: Why the use of temporary accommodation must end* https://england.shelter.org.uk/professional_resources/policy_and_research/policy_library/still_living_in_limbo

The Local Government Association also identify a wide range of impacts that growing up in temporary accommodation can have on children and young people.[26] These range from disruption of access to universal healthcare like vaccinations; higher rates of infection and accidents; risk of sexually transmitted infections and unwanted pregnancies; higher rates of stress, anxiety, depression and behavioural issues; poorer educational attainment and attendance; bullying and isolation; increased experience of trauma, abuse and other adverse experiences; higher risk of exploitation, trafficking and involvement in gang or criminal activity.

[26] Local Government Association, 2017, *The Impact of Homelessness on Health: A Guide for Local Authorities* https://www.local.gov.uk/sites/default/files/documents/22.7%20HEALTH%20AND%20HOMELESSNESS_v08_WEB_0.PDF

Activities and services to address homelessness and rough sleeping

Services provided or commissioned by the council

The council's homelessness services cover homelessness and housing options and temporary and supported accommodation. They comprise Housing People Services within the council's Homes & Adult Social Care directorate.

Broadly speaking, the council's homelessness services offer:

- Housing advice and homelessness prevention
- Allocation of social housing
- Temporary accommodation
- Landlord liaison and housing solutions
- Supported housing and rough sleeper services

For the financial year 2025/26, the total budgeted cost of providing these services is £31.4 million, which is allocated as follows:

- £28m on temporary accommodation
- £2.9 million on housing options and homelessness prevention
- £0.5 million on travellers' services

The budget includes funds from the council's own resources and income from rents and charges and government grants, including the Homelessness Prevention Grant and Rough Sleeping Prevention and Recovery Grant.

Homelessness and Housing Options

Housing advice and homelessness prevention

For households at risk of homelessness in the next 56 days, the council will try to help people remain in their current home. The things the council may do to help stop someone from losing their home include:

- Information about landlords' responsibility for repairs and maintenance.
- Advice and representation if a landlord or lender have applied to a court for an eviction order.
- Information about unlawful eviction and how landlords must follow the correct legal steps.
- Advice for those living in council housing or who want advice on applying for council housing.
- Advice on benefits and money problems
- Advice on Universal Credit help with housing costs for renters.

- Advice on how to apply for a discretionary housing payment if universal credit or housing benefit does not cover someone's full rent.
- Advice on debt respite or 'breathing space' to give someone more time to deal with rent arrears.
- Advice for dealing with priority debts.

The initial point of contact for someone approaching the council for housing advice or support is through the Housing Advice and Triage team. As well as providing advice and information to prevent homelessness, the team process initial homelessness applications and refer these to one of three other teams within the service. These are:

- Homelessness Prevention and Relief
- Pathways and Partnerships
- Housing Allocations

The Housing Advice and Triage team deal with around 3,000 requests for housing advice and process around 1,700 homelessness applications a year.

Support and advice to prevent or relieve homelessness

Most of those who are assessed as being owed a prevention or relief duty by the council will be referred to the Homelessness Prevention and Relief team. For those who are owed a prevention duty by the council the team will focus on preventing homelessness, either by negotiating with landlords, referring applicants for additional support or linking them with properties in the private rented sector. However, around 70% of those making a homelessness application present at the relief stage, that is, when they are already homeless. The team will work with these applicants to agree steps that both the applicant and the council will take to secure accommodation. For most, this will mean a placement in temporary accommodation while their application is being processed.

Support and advice for people facing barriers to access or with complex or high levels of need.

The Pathways & Partnerships team carry out homelessness assessments and prevent or relieve homelessness for people facing barriers to access or who have complex or high levels of need. The team work closely with and take referrals from mental health services (Sussex Partnership NHS Foundation Trust), the Royal Sussex County Hospital, the Probation Service, services for people experiencing rough sleeping, services for young people aged 16-17 and care leavers aged 18-21, services for people with multiple compound needs and refugee support services as well as from supported accommodation providers.

Allocation of social housing

Social housing is allocated by the Housing Allocation team. If someone is assessed as being owed a main housing duty, the team will assess their housing and support needs

and assign them to the housing register – the waiting list for social housing. Given the long waits for social housing, the team will also support the applicant to access housing in the private rented sector as a route out of temporary accommodation.

Temporary and Supported Accommodation

Temporary accommodation

If the council cannot prevent a household from becoming homeless, or if the household is already homeless when they first approach to the council, the council will assess whether the household is eligible and has a priority need for accommodation.

Households who are homeless, eligible and have a priority need are offered temporary accommodation if they have no friends or family they can stay with. They must contribute towards the cost of temporary accommodation with income or Housing Benefit.

Nearly all the council's temporary accommodation is in Brighton & Hove. However, it is not possible to procure enough temporary accommodation in the city for everyone that needs it, so a small proportion is located outside the city. Temporary accommodation offered by the council comprises accommodation units within council owned stock, the private rented sector, housing associations, B&B and hostels. The council has 100% nomination rights to units managed by Seaside Homes, an independent charity providing affordable social rented housing in the city.

Housing solutions

The council's Private Rented Sector and Leasing team help people avoid homelessness by securing safe, affordable, and sustainable accommodation in the private rented sector. The service currently works with over 230 landlords across the city. The offer includes property assessment and negotiation, ensuring that homes meet safety and energy standards and negotiating fair tenancy terms. Tenancy establishment supports people with viewings, tenancy agreements, and provides financial assistance such as deposits and rent in advance. Post-move support includes helping people register for benefits, council tax, and utilities, and providing essential furnishings.

The Move On service helps residents transition from temporary accommodation or hosting arrangements into settled housing. As well as supporting people to move on from temporary accommodation, the service assists people in hosting arrangements such as Homes for Ukraine to formalise a tenancy with their host or to move on from their placement. The service provides tenancy support, financial assistance, and coordination with landlords to ensure successful transition into longer term housing. The service aims to deliver around 300 move-ons from temporary accommodation into the private rented sector and social housing per year. This target is part of a broader strategy to reduce numbers in temporary accommodation.

The council has a dedicated Tenancy Support team who work closely with vulnerable households to help stabilise tenancies and provide practical support. This includes ongoing support with budgeting, benefits, and tenancy responsibilities. Early intervention is triggered if issues arise within a tenancy, helping to prevent breakdowns.

The council also delivers several special projects. Homes for Ukraine supports Ukrainian guests through outreach, advice workshops, and tenancy support, enabling them to formalise arrangements or move into independent housing. Refugee resettlement provides financial packages and tenancy support to help refugees secure and sustain housing through the private rented sector access scheme. Accommodation for Ex-Offenders helps ex-offenders secure settled accommodation through tenancy support and landlord incentives.

During the pandemic, the council delivered the Everyone In programme, housing more households in a single year than at any time previously.

Commissioned services

Rough sleeping and homeless support services commissioned by the council's Homes & Adult Social Care directorate consist of a range of core and grant funded support and accommodation services delivered by voluntary, community and social enterprise organisations (with the exception of the Off Street Offer delivered directly by Brighton & Hove City Council).

Commissioned services fall into two main categories:

- Community support services which include street outreach, advice and floating support services offering support to people in community venues and their own homes.
- Accommodation based services with differing levels of support from high to low support for various client groups including homeless adults, young people, and families.

Community support services

Family Mediation

Family mediation is a core funded service delivered by YMCA Downslink through the Youth Advice Centre. The service aims to prevent homelessness and support young people to rebuild relationships with their families. Until June 2025 the council also worked in partnership with YMCA Downslink to deliver housing advice for young people through the Youth Advice Centre. The core statutory housing advice service is now delivered in full by the Council. The Youth Advice Centre receives funding separately and continues to provide youth support.

Rough Sleeper Street Outreach Service

The Rough Sleeper Street Outreach Service is a core funded service delivered by Change Grow Live. The service is responsible for identifying new rough sleepers and supporting existing ones. They engage with and assess the needs of people living on the streets and help them access accommodation, support, or with relocation when there is a support network or local connection elsewhere. This service offers a fast route away from the streets and to avoid long-term homelessness.

Change Grow Live also deliver the following grant-funded projects: Assessment & Reconnection Workers, Navigators, the Homeless Outreach Assessment Project (known as The Circle) and Surge Accommodation (The Fab).

Navigators

Navigators is a grant funded intensive support service providing tailored support for people with the most entrenched complex needs who have a history of repeat rough sleeping. The team support clients to move off the streets and to maintain accommodation as well as linking them to support services, including mental health and drug and alcohol support. The service is due to merge with the Changing Futures team during 2025/26 to deliver a more focused multi-disciplinary approach for people who have a history of long-term rough sleeping, multiple compound needs and social exclusion.

First Base Day Centre

First Base is delivered by Brighton Housing Trust and offers a range of services to support people who are sleeping rough or are insecurely housed in the city. These include food, showers, lockers and laundry facilities, case work support, accommodation and relocation services, as well as access to health services and employment and learning support. First Base hosts a range of external organisations and health workers who use it to engage with people sleeping rough. Grant funding from the council funds two full-time equivalent staff members who work to relocate those with no local connection if there is a support network or local connection elsewhere.

Homeless Recovery Service

The Homeless Recovery Service is funded through Brighton & Hove City Council's Public Health Grant and delivered by Change Grow Live. It has around 250 service users. It offers recovery focused drug and alcohol support to people who are homeless in the city.

Accommodation based support services for young people

The council's Homes & Adult Social Care directorate commission a variety of accommodation-based services designed specifically for vulnerable young people aged 16 to 25.

Young people using these services often require support with mental health challenges and complex needs, frequently stemming from rejection and other adverse childhood experiences. These services are expected to be creative and flexible, operating within a framework of personalised, trauma-informed care.

Support is delivered in collaboration with social care services and other specialist agencies working with this age group. A mix of one-to-one and group programmes help young people to develop positive social connections, daily living skills, access to work, learning and leisure activities.

Sussex Nightstop

Sussex Nightstop is a core funded service offering emergency accommodation for young people aged 16-25 who are homeless (including sofa-surfing) or at risk of homelessness in welcoming homes with vetted and trained volunteer hosts. The service also offers support, guidance, and access to other service and information to help young people to return home or secure alternative accommodation.

Brighton & Hove Foyer

Sanctuary Supported Living deliver the core funded Brighton & Hove Foyer. This supported housing scheme offers 50 units of accommodation and support for young people in 2-to-3-bedroom shared flats. The service includes 30 medium-support bedspaces and 20 low-support bedspaces. With staff available 24 hours a day, assistance is individually tailored, preparing residents for independent living.

YMCA DownsLink Group

With core funding from the council, YMCA DownsLink Group provide accommodation-based support across various properties in Brighton & Hove. This includes units with 24-hour support, as well as semi-independent accommodation for those with lower support needs, typically those transitioning from high-support settings.

The projects include Gareth Stacey House (high support), Lansworth House (high and medium support), and Chris Batten House and Blatchington Road (both offering medium to low support).

Young Families Support Service

YMCA DownsLink Group also deliver a core funded supported accommodation for young parents aged 16 to 25 with children up to 5 years old. It adopts a trauma-informed approach and works closely with NHS and social care services.

Stopover

The core funded Stopover project delivered by Impact Initiatives offers tailored support and accommodation for vulnerable young women, including those with complex and high support needs. Stopover's eleven houses and staff team give on-going support throughout the transition from 24-hour support to living independently.

Low support accommodation services for adults

Someone with low support needs can recognise their own needs, are fully engaged with the support offered and can seek help when they need it. Many people living in low support housing have stepped down from high or medium supported accommodation, rather than moving directly into a low support service.

Someone living in low support housing will typically have up to 2 hours individual support a week plus access to additional activities within or outside the service. They are not expected to require support from the service outside of normal office hours, being able to access help from universal services if needed.

George Williams Mews

Brighton YMCA provide 24 units of core funded self-contained accommodation. The support offered is based upon a personalised support plan. People using the service are supported to manage their accommodation in preparation for independent living. This includes claiming housing benefit, paying rent and utilities, and maintaining the condition of the property.

Quays Housing

Quays Housing provides grant funded, low support accommodation for people aged 18 and over who have been rough sleeping. The service offers 29 beds in self-contained accommodation with low-level on-site support. Residents receive 1 to 2 hours of flexible support a week, with regular contact tailored to their individual needs. They can participate in a variety of activities based on their preferences and aspirations. Support is delivered using a personalised approach within a psychologically informed environment.

St Mungo's

St Mungo's, in partnership with Clarion Housing Association, deliver a grant funded project for people needing low levels of support. The scheme comprises 23 self-contained flats, including bedsits, one-bedroom flats, and two two-bedroom flats, all let on Assured Shorthold Tenancies. Support from St Mungo's staff is available Monday to Friday from 8am to 6pm, with on-site security outside these hours.

The service takes a psychologically and trauma-informed approach, incorporating strengths-based and recovery-focused practice. Support offered is personalised and client-led, empowering people to work towards long-term independence.

Rapid Rehousing Service

Southdown deliver the grant funded Rapid Rehousing service which provides move-on homes with floating support. Referrals are taken for people with low support needs currently rough sleeping, those with a history of rough sleeping living in emergency accommodation, or those at risk of rough sleeping. The service comprises 29 private

rented sector flats secured under 10-year leases and located across the city. It offers personalised, flexible support, with the goal of enabling tenants to access settled accommodation within two years. The service works closely with the council's temporary accommodation team who allocate the accommodation.

Transition and Resettlement Service

Southdown also deliver a Transition and Resettlement Service, providing floating support to help people move successfully into independent accommodation. Commissioned with core and grant funding, it provides flexible floating support to people living in independent housing. This service is available to those who have moved directly from rough sleeping, from supported accommodation, including mental health supported accommodation, or from interim accommodation arranged by the council. It also supports people who are having difficulty living independently and sustaining their tenancy. The service works closely with the council's Housing Solutions Team. Eighty percent of referrals come through the rough sleeping and single homeless pathway with the remaining 20 percent via the mental health pathway.

Medium support accommodation services

Someone with medium support needs can engage with services but their level of engagement and motivation to change may be inconsistent and fluctuate. They will generally be able to manage with some support; however, their fluctuating needs could give rise to relapse or disengagement from services. A person with medium support needs may occasionally require access to support from staff overnight or at the weekend.

People with medium support needs will generally receive support from on-site staff or partner agencies for up to 5 hours a week. Support will need to be flexible to respond to an individual's changing support needs and aim to prevent crises or relapse. Additional group work and support to engage with off-site community activities can be part of someone's journey towards independent living.

Brighton YMCA

This core funded service provides 123 units of shared and self-contained medium support accommodation across three sites. Using psychologically informed environment, trauma-informed, and strengths-based approaches, the service tailors support to meet individual needs. It empowers clients to identify their aspirations, overcome barriers to recovery, build resilience, engage with their local community, and maximise their potential for independence. The service also offers peer-led support, in-house counselling, with on-site support for mental health, and substance misuse issues. There are daily activities, support to access work and learning opportunities, and enhance wellbeing. Personal budgets enable clients to access activities, either on or off site.

Seagull Project

Using a personalised trauma informed model, Safe Haven Sussex deliver the grant funded Seagull Project provides safe and stable supported accommodation for single adults, to enable an ongoing period of stability and step down into lower support whilst long term options are put in place to prevent repeat homelessness. Provision of smaller units of accommodation bridges the gap between current accommodation and independence for individuals requiring medium level of support. The Seagull Project provides 36 units of accommodation in houses across the city.

Housing Led Support Service

This grant funded project accommodates 40 residents with medium-support needs. It is delivered by the same St Mungo's team as the high support Housing First service. Residents are expected to be ready to move to a lower support or independent living setting within a two- to three-year timeframe.

High support accommodation services

Someone is deemed to have high support needs if they have trauma-related support needs such as mental health issues, substance misuse, physical frailty, offending behaviour or combinations of these. Some people using these services may be ambivalent or reluctant to engage with support offered. Residents may require access to support 24 hours a day, have one to one contact time with staff for at least 5 hours a week plus additional group and community activities.

Phase One

Brighton Housing Trust's Phase One is a core funded, 52 bed hostel for single homeless people with complex support needs. The service offers a strength and needs based service, tailored to the individual resident. It offers a psychologically informed and recovery focused approach, and flexibility and personalised support along with a range of life skills, group work, peer support, network building, community involvement and leisure activities all geared to increase engagement, build resilience and support positive change.

George Williams Mews

Brighton YMCA's George William Mews service also provides 25 high support accommodation units across five shared houses, offering support within a psychologically informed environment. Residents receive help to build relationships within the community, engage in health and wellbeing activities, and explore work and learning opportunities. Access to an in-house counselling service is also available.

Equinox Care

Equinox Care's core funded women's high and medium support service offers a specialist women only support and accommodation with a personalised, gender aware

and trauma informed model. The service offers 18 units of accommodation over two sites in Hove.

The high support site has 9 beds with 24/7 staffing. It provides intensive support and accommodation for women with multiple and complex needs and offers a safe environment for stabilisation and assessment. Residents can work to develop a personalised recovery plan and address the issues that led to them becoming homeless.

The medium support site provides step down accommodation for women from the high support service who are ready to live in a lower support environment but still need the help of staff to maintain and continue their recovery. It also offers support and accommodation for women coming into the service with less complex needs.

Housing First

The core and grant funded Housing First service delivered by St Mungo's offers 60 units of high support needs accommodation. People using the service are offered a home in council housing stock with flexible and personalised support provided. The housing offer is unconditional, and support is not dependent on behaviour. Clients are seen at least weekly, often daily, with staff using an assertive support model with creative, tailored approaches. The team has a personalisation fund to enable residents to engage in leisure or learning activities that align with their interests or to help them purchase items for their homes.

Off Street Offer

Off Street Offer is a grant funded accommodation-based rapid assessment and move-on service for men experiencing homelessness, including those with a history of long-term or reoccurring rough sleeping. It is delivered by Brighton & Hove City Council's Homes and Adult Social Care directorate. The service identifies a suitable accommodation option and makes appropriate referrals. It also facilitates reconnection to other local authority areas for those with recourse to public funds but who have no local connection to Brighton & Hove. The male only service has 30 units of accommodation and takes referrals from the Street Outreach Service. The service has no minimum stay but has a target for an average stay of 90 days.

Homeless Outreach Assessment Project

The Homeless Outreach Assessment Project, delivered by Change, Grow Live, is a grant funded 16 bed service. The project takes referrals from the Street Outreach Service. The service has no minimum stay but has a target for an average stay of 90 days. It prioritises women experiencing rough sleeping and will also work with couples. It also accepts referrals for people with no recourse to public funds.

Surge Accommodation

Change Grow Live also deliver Surge Accommodation, a grant funded 14 bed service that will accept referrals for people with no recourse to public funds. It takes referrals from the Street Outreach Service and has no minimum stay.

Severe Weather Emergency Protocol provision

Change Grow Live deliver severe weather emergency provision in the city. When activated, the Severe Weather Emergency Protocol (SWEP) offers shelter to all rough sleepers in the city. The SWEP is currently activated on the forecast of 'feels like 0 degrees' as predicted on the MET office website, when there is an amber weather warning or at other times when severe weather is predicted. Shelter is provided regardless of an individual's needs or local connection. The council is required to ensure that shelter venues are in place, are adequately staffed and are managed safely.

Services provided by the voluntary, community and social enterprise sector

Working Together, a 2021 report by Community Works, the Frontline Network, Justlife and YMCA DownsLink Group, mapped services provided by the voluntary, community and social enterprise (VCSE) sector to address homelessness in Brighton & Hove. Based on responses to a survey of 44 VCSE organisations they identified 110 VCSE organisations operating in the city, providing 204 relevant services. These covered accommodation, advice and practical support as well as help to prevent homelessness. The VCSE organisations identified included those specialising in support for people experiencing homelessness and non-homelessness-specific organisations. The information below is derived from the *Working Together* report unless otherwise stated.

The city's VCSE sector offers people experiencing homelessness a wide range of accommodation and other support services, including social connection, food, basic provisions, health and wellbeing support, life skills, training and employment advice.

In 2021, the sector provided 772 units of accommodation, including accommodation commissioned by the council and accommodation funded from other sources including grants and charitable donations. In 2020, with the support of VCSE organisations, 426 people achieved a positive move on from their accommodation, with 408 people securing accommodation in the private rental sector.

Of the 44 organisations who responded to the *Working Together* survey, all offered other support apart from accommodation. 41 provided help with basic needs, with the provision of food as the most common form of support, including foodbanks, food parcels and meals. Other support for basic needs included clothing, bedding, furniture, phones, and hygiene items.

Most of the organisations surveyed for *Working Together* provided help to promote independence, including developing personal resilience, pursuing interests and hobbies, and building critical life skills, such as budgeting, planning and managing conflict.

Twenty-nine organisations provided some form of advice and information, including signposting to other sources of support, 9 gave debt advice and 5 provided legal advice. Other areas of advice and information included welfare benefits and housing advice, including how to access the private rental sector. Several organisations offered advocacy, mediation, casework or key worker support.

Nine organisations offered regular drop-ins, with four providing a day centre service. Street outreach services were delivered by 5 of the organisations surveyed.

Health and wellbeing were identified as significant issues facing people experiencing homelessness. Almost half the organisations surveyed offered services to support health and wellbeing, ranging from mental health support (n=20), substance misuse (n=13), physical health (n=12) and sexual health (n=6). Others provided wellbeing activities, befriending, spiritual support and help with the welfare of people's pets.

Many organisations provided support for specific communities and groups of people including women (n=20), people with long term conditions (n=16), LGBTQI+ people (n=15), current or ex-offenders (n=14), children and young people (n=11), survivors of domestic violence (n=10), refugees (n=9) and others.

The VCSE sector also plays a significant role raising public awareness of the issues surrounding homelessness, fundraising, campaigning for change, and seeking solutions to prevent homelessness. Finally, the sector plays a key role in facilitating and contributing to partnership working to address homelessness. This is covered more fully in the section below on partnerships.

The *Working Together* report estimated that the value of services provided by the VCSE sector in the city was somewhere between £10 million and £20 million.[27] The report points to the ability of the sector to draw in additional funding to tackle homelessness from grants, charitable donations and other non-statutory sources.

Homeless healthcare services

People experiencing homelessness use a broad range of healthcare services, including universal services such as GPs, dentists and pharmacies, community healthcare and urgent care. Access to healthcare is often disrupted by the experience of homelessness

[27] Community Works, Justlife and the Brighton & Hove Frontline Network, YMCA DownsLink Group, 2021, *Working Together: Our Vision to End Homelessness* https://www.justlife.org.uk/our-work/publications/working-together-our-vision-to-end-homelessness

and some healthcare services are used disproportionately by people experiencing homelessness. These include A&E and some specialist services including mental health and drug and alcohol services.

As well as universal healthcare services, there are a number of specialist services in Brighton & Hove for people experiencing homelessness.

Arch Healthcare

Arch Healthcare offer GP services for people who are experiencing rough sleeping, living in temporary accommodation, sofa surfing or who are a traveller. With a list size of around 1,600 patients, the practice offers a full range of general practice healthcare services with GPs, nurses, and paramedics. It includes a hospital in-reach team, an outreach nursing team, and a health engagement team for people living in temporary accommodation based with Justlife. The service is commissioned by NHS Sussex and funded through the Better Care Fund.

Sussex Community NHS Foundation Trust – Health Inclusion Team

The Health Inclusion Team comprises nurses, health care assistants, a nurse prescriber, an occupational therapist, an associate therapist, and a physiotherapist. There is also a dedicated hospital in-reach nurse. With a caseload of around 150 patients, the service focuses on patients with tri-morbidity, meaning those with three or more chronic health conditions. The team works in a trauma-informed way, recognising the impact of past negative experiences on patients' engagement with services. The goal is to help patients manage their health needs and improve their engagement with both primary and secondary healthcare services. The team collaborates with other organizations, including Arch Healthcare, Justlife, and the council's housing and social care services. The service is funded through the block community health contract.

Sussex Partnership NHS Foundation Trust – Homeless Support Team

The Homeless Support team delivers mental health care to homeless and insecurely housed people in Brighton & Hove. With a caseload of approximately 125 patients, the service aims to provide high quality, easily accessible and flexible healthcare to people with a mental illness who are rough sleeping, living in temporary accommodation, or sofa surfing. The team does not work with people living in supported accommodation or people at risk of homelessness as these client groups are able to access mainstream or other support services.

Services for people with Multiple Compound Needs

People with Multiple Compound Needs experience 3 or more of the following: homelessness, substance misuse, mental health issues, domestic abuse, contact with the criminal justice system. Brighton & Hove Health and Care Partnership, comprising NHS commissioners and providers, the council, and the voluntary and community

sector, has agreed that Multiple Compound Needs should be one of its five population health priorities for the city. The partnership is delivering a Multiple Compound Needs transformation programme to drive greater integration across specialist homeless healthcare, housing and social care services to improve outcomes for people with Multiple Compound Needs.

Changing Futures Sussex

The national Changing Futures programme is a joint initiative by the Ministry of Housing, Communities and Local Government (MHCLG) and The National Lottery Community Fund. The Changing Futures Sussex pilot programme covers East Sussex, West Sussex and Brighton & Hove. Funding was initially allocated until the end of March 2025, but the government has extended funding for a further year.

Changing Futures Sussex operates at individual, service and system levels. Individuals referred into the service receive flexible, trauma informed, person-centred support when they need it, leading to more periods of stability and more opportunities to make positive changes in their lives. The service operates a 'no wrong door' approach and coordinates support across services, thereby reducing demand on 'reactive' services. At the system level Changing Futures aims to build effective multi-agency partnerships with data sharing agreements and better use of data shaping service commissioning.

Changing Futures Brighton & Hove is a multi-disciplinary team (MDT) based within Brighton & Hove's City Council's Homes and Adult Social Care Directorate. The service has 13 full time equivalent staff comprising social workers, housing options staff, peer support workers, domestic violence and drug and alcohol specialists. With a caseload of around 120 service users, it is jointly funded by the Changing Futures Sussex grant, the city council and the NHS Better Care Fund.

The Changing Futures MDT aims to provide a holistic 'team around me' service for people with Multiple Compound Needs. It also aims to deliver swifter and safer outcomes for women and fewer preventable deaths and Safeguarding Adults Reviews relating to women experiencing multiple disadvantage. The pilot service launched in December 2022 and was fully operational by summer 2023.

The Brighton & Hove MDT pilot was recently independently evaluated.[28] Recommendations made by the evaluators are summarised below, with detailed findings in the full report. Some of these relate to the planned creation of a new Multiple Compound Needs Integrated Community Team but others have broader implications for homelessness support and accommodation services.

[28] Imogen Blood Associates, Independent Evaluation of Changing Futures Multi-Disciplinary Team, Brighton & Hove, 2025

- Build on the trauma-informed, Team around Me, approach in the planned new Multiple Compound Needs Integrated Community Team.
- The design, delivery and ongoing monitoring and evaluation of the Integrated Community Team should be co-produced with people with lived experience.
- Increase the supply of safe and suitable emergency accommodation for people with Multiple Compound Needs who are particularly vulnerable to abuse and exploitation, including domestic abuse.
- Consider how gender-specific services for women with Multiple Compound Needs in the city might be better integrated and barriers to access reduced.
- Further work is needed to engage criminal justice agencies.
- Need for an integrated response to co-occurring mental health, substance use, and underpinning trauma.
- Build in a flexible personalisation budget for the Integrated Community Team to ensure people's immediate needs are met, for example, for food, drink, bedding, clothing, transport, personal and household items.
- Better join up existing resources, develop clear housing, care and support pathways for people with Multiple Compound Needs and consider how the Housing First offer might be scaled up as part of the next phase of Integrated Community Team development.
- Sustain the wealth of community recovery activities in the city and continue to develop the 'recovery pack' and training offer being developed by the MDT's peer support team.
- Ensure longer-term monitoring of outcomes and patterns of wider service usage across the caseload.

Resources

Partnership arrangements

A review of partnership arrangements by the Assistant Director of Housing in early 2024 identified 32 standing partnership groups and forums which were relevant to tackling homelessness and rough sleeping in the city. A mapping exercise by Common Ambition in 2023 (updated February 2024) identified 21 multi-agency meetings, forums and working groups.[29]

Some of these groups relate to a broader geographical area but most are specific to Brighton & Hove. They can be categorised along the following lines:

Statutory and non-statutory groups, where homelessness is a consideration but not the sole focus of the group. Examples include the Safeguarding Children Board, Safeguarding Adults Board, Health and Wellbeing Board, Community Safety Partnership, Violence Against Women and Girls Oversight Board, Mental Health Accommodation Group, Sussex Trauma Informed Community of Practice and others.

Networking and strategic groups where homelessness is the primary focus of the group. These include the following standing groups:

The Homelessness and Rough Sleeping Network, facilitated by Justlife, comprises leaders from the voluntary, community and social enterprise sector working towards preventing and ending homelessness through collaboration within the sector and with statutory partners and wider stakeholders. The network has around 25 member organisations and meets quarterly, with a strategic leads group meeting monthly. There are also sub-groups focused on workforce development, and psychological safety.

The Homeless Operational Forum is a monthly forum for homelessness services across the city to share updates on services, best practice, updates on commissioning. Initially set up by homelessness commissioners at Brighton & Hove City Council it is currently facilitated and chaired by Justlife.

Brighton & Hove Frontline Network provides a space for Brighton's frontline homelessness workers to connect. The network has a monthly e-newsletter and hosts in-person events where workers can learn, share ideas and discuss relevant topics and issues. Facilitated by Justlife, it is part of a national network organised by St Martin in the Fields.

The Brighton & Hove Homelessness Research Forum brings together academic, third sector and community researchers, including peer researchers, from across the city to

[29] Common Ambition, 2024, Multi-Agency Working Update https://www.bhcommonambition.org/wp-content/uploads/2023/03/Multi-Agency-Working-Update-March23-v1.pdf

exchange ideas, develop joint projects and bring about research-led change, improving the lives of people experiencing homelessness.

The Young Homeless Working Group is co-chaired by YMCA Downslink and Brighton & Hove City Council. The group's purpose is to ensure a strategic partnership approach in the planning and delivery of services to young homeless people (including young families), with the aim of preventing and reducing youth homelessness and ensuring that vulnerable groups, including care leavers and people with protected characteristics under the Equality Act, receive services that are sensitive to their needs.

Healthcare providers meet regularly through the Multi-Agency Homeless Health Meeting.

Multi-agency standing groups performing a specific role or function, for example, in project or programme governance or in managing resources or decision making. Homelessness may be a consideration or the primary focus of the group. Examples include the Changing Futures Strategic Sponsors Group, the Multiple Compound Needs Transformation Programme Board, the Multi-Agency Homeless Health Meeting, Common Ambition Steering Group, and the Supported Accommodation Panel.

The 2024 partnership group review by the Assistant Director of Housing pointed to a lack of appropriate governance arrangements to coordinate delivery of the 2020 to 2025 homelessness and rough sleeping strategy. It proposed a new structure to deliver the planned 2025 to 2030 strategy, comprising a Homelessness and Rough Sleeping Strategy Steering Group with 3 to 4 thematic delivery groups focused on homelessness prevention, securing accommodation, rough sleeping and, potentially, youth homelessness.

Involvement and co-production

Brighton & Hove Common Ambition brings together people with lived experience of homelessness, frontline providers and commissioners through co-production within homeless health services. It is a partnership project hosted by Arch Healthcare and Justlife. Common Ambition groups have co-created system and pathway maps, co-production toolboxes, service improvement and systems change prototypes and a range of other resources to support co-production.

Justlife Peer Researchers is a project funded by The Young Foundation to test the feasibility of peer research in the housing sector. Two peer research groups have focused on two specific questions related to temporary accommodation in Brighton.

Youth Voice feeds into the development of The Clock Tower Sanctuary's services as well as considering broader youth homelessness issues. The group bring a range of personal experiences of intersectionality that impact their experience of

homelessness. Youth Voice has contributed to developing thinking on a homeless hub, with a focus on young people.

Funding

The funding available for expenditure on council funded homelessness services is drawn from a combination of the council's own resources and income from rents, fees and charges and grant funding from central government.

The 2025/2026 budget for Housing People Services (comprising Housing Options & Homelessness, Temporary Accommodation and Travellers Services) was £31.447 million. This includes the £28.026 million cost of providing temporary accommodation.

The total budgeted income for Housing People Services for 2025/26 is £22.627 million, of which income for temporary accommodation is £20.146 million.

Council 2025/26 Revenue Budget										
Service Description	Employee Expenditure £m	Other Expenditure £m	Total Expenditure £m	Income From Fees, Charges & Rents £m	Other Income £m	Government Grants £m	Total Income £m	Total Budget Allocation £m	Capital Charges & Recharges £m	Net Expenditure / (Income) £m
Housing Options & Homelessness	2.812	0.098	**2.91**	-	-0.001	-2.371	**-2.372**	**0.538**	0.327	**0.865**
Temporary Accommodation	3.064	24.963	**28.026**	-11.50	-0.102	-8.536	**-20.146**	**7.88**	0.865	**8.745**
Travellers Services	0.198	0.313	**0.511**	-0.109	-	-	**-0.109**	**0.403**	0.153	**0.555**
Housing People Services Total	**6.074**	**25.374**	**31.447**	**-11.617**	**-0.103**	**-10.907**	**-22.627**	**8.82**	**1.345**	**10.165**

Source: Brighton & Hove City Council Budget Book 2025/26 & Medium Term Financial Strategy 2025/26 to 2028/29

Housing People Services have a 2025/26 savings target of £2.5 million.

The council also funds housing support for vulnerable individuals to help them live independently. The allocated Supporting People budget for 2025/26 is £1.012 million. A further £2.255 million is allocated to fund Supported Accommodation.

Other 2025/26 council funding allocated but not included in the figures above includes the provision of accommodation by Asphaleia for Unaccompanied Asylum Seeking Children (Asphaleia), the drug and alcohol recovery service (Change Grow Live) and grant funding for YMCA Downslink Group - Youth Advice Centre, Justlife and Sussex Homeless Support through the Household Support Fund.

Grant funding

As well as income from rents, fees and charges the council receives grant funding from central government.

The Homelessness Prevention Grant (HPG) is intended to prevent homelessness and households entering temporary accommodation. Brighton & Hove's HPG allocation for 2025/26 was £10,907,372.

The Rough Sleeping Prevention and Recovery Grant (RSPARG) consolidate the main rough sleeping and single homelessness focused grants into a single pot. RSPARG funding was first allocated to local authorities for 2025/26, with Brighton & Hove receiving £2,364,470 to help support people experiencing rough sleeping in the city.

Services provided through RSPARG include off street offer accommodation, reconnections services for those experiencing rough sleeping, long term supported accommodation, support for access to the private rented sector including specialist role working with those leaving prison.

The Rough Sleeping Accommodation Programme is intended to provide ongoing support costs to help rough sleepers into longer-term accommodation alongside specialist staff supporting their mental health and substance abuse problems to pave the way for job opportunities. Brighton & Hove's allocation for 2025/26 was £856,041.

Brighton & Hove is one of 83 areas receiving Rough Sleeping Drug and Alcohol Treatment Grant. This is intended to fund evidence-based drug and alcohol treatment and wrap around support for people sleeping rough or at risk of sleeping rough, including those with co-occurring mental health needs. The allocation for 2025/26 was £741,281. It funds 3 accommodation based supported housing projects including housing led support for people with council tenancies.

In 2024/25 the council also received an additional central government grant of £595,016 to address additional homelessness and rough sleeping pressures during winter 2024/25. This was announced as one off funding and there is no guarantee that a similar amount will be received in 2025/26.

Funding for specialist homeless healthcare services is approximately £3.34 million, with funding from NHS Sussex, the Better Care Fund, the national Changing Futures programme and the Public Health Grant.

Future cost pressures

The rising cost of temporary accommodation

The use of temporary accommodation brings major financial risks for the council as costs reflect levels of demand, price inflation and supply shortages. All these factors

drive the use of more expensive forms of accommodation to meet the council's legal duties. Over the last 2 years, the rising cost of temporary accommodation has placed significant pressure on the council's overall financial position. The council budgeted for costs of £28 million on temporary accommodation in 2025/26. It is projected that there will be a significant overspend on this allocation by the end of the financial year.

The scale of the private rented sector market in the city and the council's use of the sector to provide almost 30% of its temporary accommodation mean that the council is particularly exposed to inflationary pressures in the market. The net cost of temporary accommodation to the council is projected to rise by about 40% over the two years 2024/25 and 2025/26.[30]

The rent subsidy for temporary accommodation determines what local authorities are allowed to recover for temporary accommodation for homeless households. This is limited to 90% of 2011 Local Housing Allowance rates. This rent subsidy level is much lower than current market rents and means that the council must subsidise the cost of temporary accommodation with an increasing net cost to the council budget over time.

Broadly speaking, temporary accommodation falls into two categories: firstly, there is more settled temporary accommodation where people assessed to be owed a housing duty are placed until they secure permanent rehousing. This form of accommodation usually involves placement in council owned accommodation or accommodation supplied through longer terms deals with private landlords. The second category (historically termed emergency accommodation) involves interim placements to relieve homelessness while homelessness applications are assessed. In the main, these interim placements are generally made using two forms of accommodation; block-booked, where units are secured for a fixed period, and spot-purchased, where units are procured in real time on a nightly basis. Spot purchased accommodation is generally the most expensive form of temporary accommodation and often involves placement in hotels and B&B.

The private rented sector in the city used to be a source of lower cost block booked accommodation in the past. However, fewer units are now available through the sector, with landlords leaving the market as leases come to an end. Consequently, this form of accommodation has had to be replaced by spot purchasing as the most readily available form of supply to meet immediate needs. Between the end of 2022 and the end of 2024, the number of spot purchased accommodation units increased from 114 to 379. Inflation within the private rented sector overall has meant cost increases for both block-booked and spot-purchased units.

An internal review of temporary accommodation cost pressures in early 2025 concluded that the issue presented a significant corporate risk to the council.

[30] 2025/26 figure based on projected year end position.

Recommendations for immediate action included better use of financial and activity data to improve both monitoring and forecasting; improved forecasting of supply needs over the next 3 years; better understanding of triggers of homelessness to move prevention activity 'upstream'; improved move on from higher cost accommodation; various measures to increase supply including better use of council stock, and working with the private and social rental sector to deliver additional units.

Anticipated loss of grant funding

In 2024, the Ministry of Housing, Communities & Local Government (MHCLG) conducted a review of the Homelessness Prevention Grant (HPG) formula to look at different ways to capture and represent homelessness pressures to fairly reflect need in the distribution of funding. MHCLG consulted on proposed changes in early 2025.[31] Proposals included a change to the funding formula, separating the funding into two distinct elements to cover temporary accommodation pressures and prevention and relief pressures, and transitional arrangements to allow local authorities to mitigate the impact of changes in allocations.

The modelled impact of the proposed changes to the formula from 2026-27 onwards, using MHCLG illustrative figures, indicates that Brighton & Hove could see a loss of around 45% of its HPG funding. The grant allocation in 2025-25 under the current formula is just over £10.9 million. This would be reduced to about £6 million using the new formula. The consultation contained proposals for a taper in funding reduction over several years.

MHCLG published the outcome of the consultation and set out next steps on 20 June 2025. As a result of feedback, there has been a further change to the funding formula and an agreement to implement transitional arrangements. A final decision has not been taken on a maximum 45% of grant funding to be used for temporary accommodation and 55% on prevention and relief. MHCLG have indicated that the new allocations, transitional arrangements and funding split will be finalised later in the year.

Under current legislation, local authorities are permitted to spend the Homelessness Prevention Grant to discharge any of their duties under homelessness legislation. At present 78% of the grant is spent on the cost of providing temporary accommodation. In its consultation on changes to the funding formula the government indicated a future expectation that a maximum of 45% of the grant can be spent on temporary accommodation. The expected changes present two challenges for the council. Firstly, the overall reduction of grant funding available, and secondly, how to shift grant funding

[31] The original consultation documents and the government's response can be found at https://www.gov.uk/government/consultations/funding-arrangements-for-the-homelessness-prevention-grant-from-202627-onwards

away from temporary accommodation towards prevention at a time when temporary accommodation costs are rising rapidly.

Evidence submitted for the review

What people with lived experience of homelessness told us

Brighton & Hove Common Ambition aim to improve support systems in Brighton & Hove through co-production and advocating for lived experience voice to be central to service and system change. Evidence from Common Ambition included feedback on the homeless pathway and homelessness services in the city from people with lived experience of homelessness.[32] Challenges identified included:

- Feeling isolated, unsupported, unsure of where to go and your rights
  'All of your time and energy is put into finding somewhere safe to live, you are jumping from one option to the next. It can be very isolating.' 'It can be really hard to know where to turn to for support, it's hard to know what services exist and which ones will help in which situation.' - 'It can be really difficult to know what your rights are and where to go if they aren't being met.'
- Fear, mistrust, stigma and judgement
  'The process is all based on doubt not trust. Council staff don't take what you say at face value, you have to evidence all of your needs and it can be very difficult to do that. It feels like no one believes you or is even listening to you.' 'You are often asked to explain your story and situation over and over to different services which can be really hard to keep doing.'
- Lack of communication and consistency
  'It's really hard to get in contact with anyone for support, people don't call you back from the council.' 'Often services like the council require you to make phone calls which can be difficult if you don't have access to a phone, don't feel comfortable talking on the phone or aren't in a situation where you can make phone calls.' 'There is a lack of communication about what the process is or what the next steps look like.' 'It's hard to know where you are in the process or what the whole process looks like. The whole housing pathway is unclear so it's hard to know what the next steps are.' 'It's not always clear who your housing officer is or how to contact them.' 'No one talks to each other across services so you can be told different things.'
- Inadequate housing options
  'You can't really say no even if the housing you are given is out of area or inaccessible due to health care needs. The council might conclude you are intentionally homeless and won't give you any other accommodation.' 'You can be evicted from emergency accommodation very easily. For having pets, for drug use, antisocial behaviour.' 'You don't know how long you might be there. It can

[32] Common Ambition, 2022, *Brighton & Hove Housing Pathway Map* https://www.bhcommonambition.org/resources/#housing-pathway-map

be really hard to settle into somewhere as you don't know when you are going to be asked to leave.' 'Sometimes you aren't put in a place that supports your recovery. Sometimes people are placed in wet or dry houses but sometimes this isn't possible and can be very difficult for someone's recovery.' 'Emergency accommodation might not be accessible. Sometimes you might not have been able to prove your accessibility needs yet so the council put you somewhere that isn't accessible to you.' 'Emergency accommodation doesn't always have access to kitchens If you have dietary requirements and don't have access to a kitchen this can be really challenging.' 'Some people don't feel safe in emergency accommodation due to neighbours, location and relationships. Sometimes people leave and then it goes against their record that they have left housing and are therefore intentionally homeless, but they have left as it was negatively impacting their mental health too much to stay.' 'It's not always possible to find accessible council homes as there aren't many of them.'

- Struggling to gather the correct documentation and evidence
  'Often services like the council require identification documents. Getting ID can be a costly process. Some services also require a fixed address and proof of this. 'The council require evidence of health care needs which can be really hard to get if you don't have a GP (as many GPs won't take on a patient without a fixed address). Also getting a referral and diagnosis to prove your health care needs can take months.' 'It can be difficult to prove a local connection.' 'You have to prove lack of funds to be able to sort out your own accommodation. The council ask you to show your bank statement.'
- Not enough support
  'Staff don't always have much training or much empathy - there is a lack of support in emergency accommodation.' 'There's a lack of continuity of care and support whilst settling into a home.' 'It's hard to get appointments at GP surgeries and if you don't have a fixed address, they often won't take you on as a patient.' 'It's hard to know what other support you might be able to access. Hard to find out the support available and what criteria you have to meet to get that support.' 'Welfare checks once a month feel more like they are checking you aren't doing anything wrong.' 'Support in temporary accommodation is inadequate. Lack of mental health support in temporary accommodation.' 'Sometimes you are just given the basics - bed, fridge and microwave in temporary accommodation and you don't have money to go and buy a kettle and all the other things you need.' 'It's confusing and unclear who receives the money and when and then how the rent is paid.'
- Other issues identified included the poor condition of some temporary accommodation, digital exclusion and financial difficulties that are compounded by homelessness.

- Getting stuck for long periods of time at points in the pathway
  ‘There’s limited information on council properties. People can't look at the property before they say yes, there is only a small photo on the site, and they can't refuse it unless there are core issues like accessibility.’
- Difficulty moving from place to place
  ‘If you have stuff to move, it can be hard; taxis don't often want to take you, and they are expensive.’ ‘You don't get given much notice to move - it's often the same day This makes it really hard to plan for and can be very costly. Often taxi drivers don't want to take you but you have no other options. Sometimes you won't have enough money to move but you have to as otherwise the council will say you have made yourself intentionally homeless as you have not taken their accommodation.’ ‘There are service charges that Universal Credit doesn't cover.’ ‘Needing guarantors for private rental.’ ‘Discrimination against people who are unemployed or who have been unemployed.’ ‘The quality of housing and maintenance is very low - often places are damp and in need of repairs. Getting things fixed can be really hard and takes ages.’ ‘Affordability of council home, bills and everything else you need.’ ‘Lack of community, isolation.’
- Waiting for decisions
  ‘It can be hard to fill your time with positive things. Finding positive ways to fill your days and build positive relationships can be really hard.’ ‘You can be in emergency accommodation a very long time. 56 days is very rare - to be there just for that period of time.’

Suggestions for improvements included

- Awareness raising
  ‘There needs to be more education around being homeless, often people think it's just rough sleeping when actually it's much wider than that.’ ‘Explore ways the general public can help more.’
- Prevention
  ‘More help for people who know they are about to become homeless. It’s hard to access support until you are actively in a homeless situation and are a priority need.’ ‘A&E staff could ask everyone if they have somewhere to go and if they need any housing support This would help to make sure more people could access support.’
- Accessing support
  ‘Reduce the level of identification needed or enable people to provide one bit of identification and the rest can follow so it’s not a barrier to receiving support.’ ‘Having one place for people to go to access support and find out information.’ ‘Emergency numbers for the council seem to be deliberately hidden. They need to be easy to find.’ ‘Council helpline to be more easily accessible and

publicised.' 'Have a passport type system where all of your information can be kept in one place that you can share with services when you want or need to so you don't have to keep telling each service provider your story.' Better information and signposting in accommodations to ensure you know about all of the support services available.' 'Recruit and train more staff.' 'Financial and physical support to move home.' 'Better training for staff to dispel preconceptions and stereotypes.'

- Housing quality and meeting people's needs
  'In some areas they have a safe surrender initiative where someone can give up their housing if they feel like they need alternative housing support and it doesn't go against their file as intentionally homeless. Currently what happens in Brighton & Hove is if you leave accommodation they will say you have made yourself intentionally homeless and it will be on your record forever.' 'Higher quality temporary accommodation. Often things are in need of repair.' 'Minimum quality housing charter.' 'Better ways of being able to raise repair issues.'
- Information
  'Clear information about what the housing pathway looks like, how long it might take and what is involved so people know what the next steps are.' 'Translation of key documents and service information into foreign languages.' 'Clear explanation of the rules is needed - there are many reasons why you could be evicted from temporary housing.' 'Easier access to the housing plan that has been created by the council.' 'Standard letter template that tells someone who their main point of contact is and who their housing officer is.' 'More information about what addresses you can use if you don't have a fixed address and need to receive documents like benefit forms.'
- Evidencing need
  'Template referrals form that GPs have that they can quickly create a referral and pass onto the council so that people's healthcare needs are evidenced.'
- Move on
  'Minimum two days notice when asked to move home.' 'More help to settle into permanent accommodation. Mental health needs are often still there.' 'Clear support and pathway if the housing is not suitable or your needs change.'
- Peer advocacy
  'Peer advocacy - having someone there to help support you through the process would be really helpful.'
- Feedback and accountability
  'More transparency from the council about what is happening, gathering more feedback from people and letting them know what improvements they are making.' 'Feedback forms for people who have been through the housing pathway.'

Building on their work to map the housing pathway, Common Ambition have identified 6 'change spaces' where they recommend improvements in the pathway should be focused.[33] These are

- Homelessness prevention
- Finding support and preventing delays
- Housing needs service experience and improvement
- Living in supported or temporary accommodation
- Moving into and living in a permanent home
- Supporting recovery from the experience of homelessness

In 2023, Justlife secured funding from the Young Foundation for a peer research project. People with lived experience of homelessness identified two issues they wanted to explore. They submitted their findings to inform the review. The research questions were:

- How do we prevent people of different intersectionalities from ending up in temporary accommodation.
- How do conditions in temporary accommodation impact people's mental and physical health?

Several themes were identified by the project:

- Quality, safety and suitability of accommodation
  'Suitability in terms of identity and neurodiversity.' 'Is it suitable anyway, but people who find themselves in this situation. It gives it another level.' Places in dark basement flat. No sound insulation. Wake me up every single morning…Because the autism. They've now brought a drum kit.' 'The place they've put me in isn't suitable. I don't have a safe bedroom. Don't have a bedroom in my life where I can just sleep.'
- Accessibility of council services
  'It was impossible getting through to the council if it was not a local charity that put me in touch with a caseworker, but even then, anything that is not straightforward gets blocked like my application and it ends in dead end.' 'If you have a specific place where you could go and register as homeless, if the organisation is in one place. 1 stop shop. See people I need to see…I'd like that so much better. They'd talk to each other. I'll go talk to them.' 'Here is the phone number, and the phone number isn't manned anywhere.' 'I didn't have a housing officer. Mine was off sick.'
- Having to repeat stories

[33] Common Ambition, 2022, *Housing Pathway Change Spaces* https://www.bhcommonambition.org/wp-content/uploads/2023/02/Maps-Housing-Pathway-Change-Spaces.pdf

‘When I have given the info they need, they still don’t understand.’ ‘Always got to talk about the same stuff, it brings you down.’

- Lack of understanding and empathy
  ‘Why is this on me? A professional is there to help. Why is it on me to beg? All this effort, you’re still not listening to me. Training with neurodiversity and trauma. Complete lack of understanding.’ ‘There is a time when the council expect you to prove things. A friend asked to prove Domestic Abuse. It makes me so mad. What rights do you have to ask to prove abuse?’
- Poor quality temporary accommodation
  ‘Place where to get washed. You can’t.’ Safety. Police knocking all times of the night. Difficult for people to go to work when your are in TA.’ ‘No locks on door.’ ‘People shouldn’t be housed together in poor conditions.’ ‘Sometimes I find it difficult to be with so many different people with different needs and it can be triggering’ ‘Rooms aren’t soundproof.’
- Impact of system
  ‘System is traumatic. Navigating system is traumatic. That includes living in TA.’ ‘System is robbing people of meaningful future. If you’ve been homeless for long periods of time. Hard to apply for jobs.’ ‘Trauma, trust issues, identity issues, building healthy relationships, increased isolation, Unemployment, Stress-related health issues, Substance issues.’ ‘Revolving door clients - could go on for 10 to 20 years for some people. Revolving door clients are ruined mentally and physically from going through the system constantly for years.’
- Move on
  ‘If there was more support when people come out of accommodation, might be able to prevent them re-entering that situation. People are often in and onto. More support at that point, might increase prevention. Can prevent homeless. That model works with health, limit readmissions.’ ‘Could take years to recover from homelessness, it's a long process and takes years.’

What those working in the sector told us

Issues identified in written submissions

As well as evidence submitted by people with lived experience of homelessness, following our initial call for evidence in December 2024, reports and other written evidence were submitted by the following organisations:

- Brighton & Hove City Council Encampments Team
- Changing Futures Sussex
- Clock Tower Sanctuary
- Justlife
- LGBTQ Switchboard

- Oasis Project
- Rise
- Safe Haven Sussex
- Sisters Salon
- Sussex Interpreting Service
- Sussex Nightstop
- University of Sussex Students' Union
- Voices in Exile
- YMCA Downslink Group

Where this evidence is in the public domain references are provided in Appendix 1.

Young people

The Clock Tower Sanctuary, Sussex Nightstop and YMCA Downslink Group submitted a recent insight report conducted to better understand how young people seek out information and support, to understand how to improve service provision.[34] They made the following recommendations:

- Recognise young people as a cohort with specific needs within the emerging Brighton & Hove Homelessness and Rough-Sleeping Strategy through a youth-specific homelessness chapter. This could include a cross-themed commissioning group that recognises the economic and social value outcomes of prevention and early intervention within youth homelessness work.
- Design and capacity-build the frontline response to youth homelessness and develop the case for resourcing a coherent and consistent 'front door' support offer with kindness, advocacy and navigation at its heart.
- Design, deliver and consistently invest in a city-wide, young-people-facing communications initiative that puts inclusivity, clarity of service offer and an encouraging and supportive approach at the fore.
- Meet young people where they are through a city-wide educational and learning piece that raises understanding of the issues of youth homelessness across workers and individuals on the frontline and that builds a high-quality, collaborative and trauma-informed youth homelessness practice approach.
- Maximise the engagement of young people in the ongoing co-production of services through joined up and representative youth voice initiatives.
- Work with academics to produce and implement a data strategy for the consistent measuring and therefore improved understanding of youth homelessness.

[34] Clock Tower Sanctuary, Sussex Nightstop, YMCA Downslink Group, 2025, *Here For You: Insight Report. How do we ensure that young people experiencing homelessness in our city don't fall through the gaps?* https://www.thects.org.uk/wp-content/uploads/2024/11/Impact-Report-2024.pdf

The Clock Tower Sanctuary submitted a report summarising the impact of their service provision for young people experiencing homelessness in Brighton & Hove. They draw attention to increases in young people experiencing homelessness both nationally and locally. For their service users the cost-of-living crisis is the primary driver of their homelessness, with 65% of clients in unsuitable housing (emergency accommodation, rough sleeping, sofa surfing, etc.) 15% were rough sleeping at end of 2023, with numbers continuing to rise into 2024. Young people using their service had limited access to suitable accommodation despite housing advocacy efforts.

Those using the Clock Tower Sanctuary's services often have high level and complex needs:

- 80% have mental health conditions
- 30% are neurodivergent
- 20% are refugees/asylum seekers
- High levels of trauma and social isolation

The report highlights to importance of meeting basic needs first - providing showers, food, clean clothes, phones, and transport passes. This foundation enables young people to move beyond 'survival mode' and engage with longer-term support.

The keyworker model shows strong outcomes, with 534 conversations supporting 95 young people in 2024. 57% of clients felt more confident managing relationships and housing aspirations. Work with 14 local housing organizations and various health and social care providers demonstrates the need for coordinated wraparound support rather than siloed interventions.

The Tenancy Independent Living Skills (TILS) program addresses a critical gap - practical life skills not taught in schools. Only 7% of their clients accessed this, suggesting potential for expansion. The establishment of a Youth Voice Group represents best practice in co-production, ensuring services are shaped by lived experience.

The University of Sussex Students' Union identified the following issues from their casework.

- International students are disproportionately affected due to guarantor requirements and inadequate pre-arrival information
- International students sometimes struggle to provide 6+ months rent in advance if they lack UK guarantors
- Rent arrears puts students at risk of eviction with no financial means to secure alternative accommodation
- Unexpected campus accommodation costs that students cannot afford

- Severe overcrowding with 3-4 international students sharing single-person Airbnb accommodation
- Students sofa surfing and staying with friends
- There are examples of students fleeing domestic violence situations
- Vulnerable students estranged from family with no support network
- Problems peak at the start of academic year when housing demand is highest
- International recruitment agencies failing to adequately inform students about housing realities in the UK and Brighton & Hove specifically
- Students arriving without secured accommodation arrangements and unprepared for the local housing market requirements
- Students initially approach the University but often don't receive adequate help
- Need for independent Students' Union intervention to advocate with the University
- Inconsistent university response (emergency accommodation provided in some domestic violence cases but not systematically)
- Poor communication from letting agencies about actual housing costs and availability

LGBTQ+ people

Switchboard submitted a report summarising service data relating to 2024. During the year they supported 104 people with concerns relating to homelessness and rough sleeping. Of these, 66 had additional support needs, 18 were trans, non-binary and intersex, 12 were migrants, refugees or asylum seekers. 45% were at risk of rough sleeping and a majority required support relating to suicide prevention. Their recommendations reinforce those in their 2023 LGBTQ+ Housing Manifesto.[35] These are:

- LGBTQ+ specific accommodation for all life stages
- LGBTQ+ specific housing information and support
- Awareness training for commissioners and quality standards for inclusive providers
- Embedding intersectional needs in future planning
- High quality data monitoring around sexual orientation and trans status

Switchboard also conducted an audit of the rough sleeping and single homelessness pathway. They made the following recommendations:

- LGBTQ+ inclusion training to be commissioned and provided across the pathways, to service managers. Training was provided at service manager level,

[35] Switchboard, 2023, *LGBTQ+ Housing Manifesto 2023* https://www.switchboard.org.uk/wp-content/uploads/2024/05/Housing-Manifesto-for-web.pdf

intended to be disseminated to respective organisations internally. This took place in early 2024. It is recommended that providers seek training from organisations run by/for LBGTQ+ communities and monitor the effectiveness of the training in improving services accordingly.

- BHCC will aim to build in LBGTQ+ lived experience into future commissioning, considering LGBTQ+ specific services but ensure all services are inclusive.
- BHCC will include the information from the audit to help shape and support the Homeless and Rough Sleeping Strategy.
- BHCC will seek evidence of LGBTQ+-affirmative practices, policies and training in future contract reviews, including feedback from service users where possible
- BHCC will maximise any future funding opportunities that may be available to support LGBTQ+ residents, working in partnership wherever possible with LGBTQ+ services
- All services across the pathway are recommended to have a LGBTQ+ champion, and to ensure that bullying, harassment and discrimination procedures include specific reference to LGBTQ+ communities, and take into account intersectionality (ie, people who have more than one protected characteristic).

People living in temporary accommodation

Justlife submitted an evaluation of a health engagement worker for people placed in temporary accommodation outside the city.[36] The evaluation was based on interviews with 8 clients of the service. Key findings were:

- Most clients of the service had significant support needs including managing finances and admin, attending health appointments, accessing necessities like bedding and laundry, mental health support, and social contact.
- Being placed away from home areas created extra support needs and increased the risk of people disengaging from essential services.
- While some benefited from being closer to family or escaping disruptive environments in Brighton, the majority struggled daily with unfamiliar surroundings and lack of established support networks.
- Many clients suffered from PTSD, with some developing serious issues including addiction to crack cocaine as a coping mechanism and suicidal thoughts.
- Distance created barriers to attending health appointments, leading to missed appointments and unmet health needs with potential long-term consequences.
- The distance put additional pressure on personal relationships, with one individual giving up custody of his child due to the physical and financial burden of daily school transport.

[36] Justlife, 2022, *Out of Area Health Engagement Worker Evaluation* https://www.justlife.org.uk/our-work/research-and-policy/out-of-area-health-engagement-worker-evaluation

- Being separated from friends, family, and familiar communities significantly worsened mental health challenges for most interviewees.
- The support offered by the service provided hope and prevented clients from disengaging with services.

Justlife also submitted evidence from a review of the needs of disabled people living in temporary accommodation.[37] Key findings were:

- Higher prevalence of disability - over 35% of those interviewed had disabilities with much higher autism prevalence.
- Unsuitable accommodation creates additional barriers. Examples included placement on upper floors without lifts, heavy fire doors, inaccessible bathrooms and unopenable windows.
- Environmental stressors in temporary accommodation can worsen existing conditions and trigger relapses
- Physical barriers lead to accidents, falls, and further health deterioration
- Isolation increases when people cannot safely leave their rooms or buildings
- The inability to perform basic daily tasks affects mental health and independence

Recommendations were to:

- Provide disability training for housing officers, support staff, and temporary accommodation providers
- Implement tools like the autism toolkit for homelessness services
- Train staff to identify disabilities and assess individual needs
- Establish basic rights standards ensuring residents can independently enter/exit rooms, bathrooms, and buildings
- Proactively install assistive technology (handrails, door openers) without waiting for requests
- Prioritise essential maintenance, especially lift repairs in multi-story buildings
- Retrofit existing properties with accessibility features
- Increase collaboration between disability support services and housing and homelessness organisations
- Use Temporary Accommodation Advisory Groups (TAAGs) to bridge sector gaps
- Include residents with disabilities in service design and decision-making
- Develop clear communication tools available in multiple formats
- Create culture of open dialogue about accommodation needs
- Ensure people understand their rights and how to exercise them

[37] Justlife, 2022, *'I kept falling down the stairs': Disability recommendations for the homelessness sector* https://www.justlife.org.uk/news/2022/i-kept-falling-down-the-stairs-disability-recommendations-for-the-homelessness-sector

- Conduct more research on the intersection of disability and homelessness
- Make research findings accessible to frontline services and housing teams
- Integrate disability considerations into housing policies, strategies, and budgets

Women experiencing homelessness

Justlife also submitted an unpublished report from the Women's Emergency Accommodation Action Group, comprising members from Justlife, Rise, Change Grow Live, Brighton Women's Centre, Sussex Pathways, Arch Healthcare CIC and Lawstop. The report makes the case for dedicated women's emergency accommodation provision. Key issues identified include:

- Significant safety and security concerns including harassment, rape, sexual abuse and cuckooing in mixed accommodation.
- Trauma and mental health impacts, especially on women who have experienced domestic abuse
- Systemic failure including lack of staff awareness of trauma informed practice and domestic abuse awareness and insufficient specialist support
- The report includes data on higher levels of physical and sexual violence impacting single homeless women and high levels of support for women only emergency accommodation amongst professionals.

The Oasis Project submitted summary service user information from the sex workers' outreach project. Key findings were that:

- Nearly half of women in contact with the service had engaged in a 'sex for rent' arrangement
- This ranged from live in work in a parlour, use of hotel or AirB&B for sex work and accommodation due to lack of deposit for housing.
- Some women had relied on a 'Sugar Daddy' to pay for rent, or to provide a deposit.
- Some women reported remaining in sex work long term in order to pay rent and to prevent homelessness.
- Others reported providing unofficial live in care with elderly or disabled individuals in order to avoid homelessness.

Survivors of domestic abuse

Rise is an independent charity that helps people affected by domestic abuse, offering practical help ranging from direct advice to refuge accommodation for those whose lives are at risk. In their submission for the review, Rise highlighted the following points:

- Domestic and sexual abuse in family and intimate partner relations are a known to correlate with homelessness

- Woman and children are more likely to become homeless or to be more vulnerable when they are homeless
- Poor management of family and civil courts processes and the need to flee from abuse
- Sex as a protected characteristic intersecting with homelessness is widely ignored.

Single adults

Safe Haven Sussex submitted summary service user data from 2023 and 2024 with a number of points made.

- In both 2023 and 2024 Brighton & Hove City Council made roughly 30% of all our referrals. The next highest referrer in 2023 was YMCA DLG (Youth Advice Centre). In 2024 the second highest referrer was Change Grow Live Street Outreach Service. The number of organisations referring to our service highlights the importance and the need for the VCSE organisations. It also may indicate that not everyone who is homeless is accessing or receiving help through the local authority.
- In both 2023 and 2024 the largest age group of people referred to our service were under 35s. In 2023, 35% were under 25, 23% between 26 and 35, 58% under 35 in total. In 2024, 29% under 25, 37% were between 26 and 35, so a total of 66% of people referred to our service are under 35, showing this is increasing.
- The majority of our referrals are male. This is consistent with previous years.
- We have found that year on year the number of referrals of people from other nations has increased. In 2024 only 51% of people referred to our service were British. This trend has meant that our service has had to adapt and make changes to the support we are providing. Such as making visual posters on our noticeboards, getting documents translated, and providing interpreters. Also providing training to staff regarding Immigration, and eVisas. All of which come at a cost.
- Only 54% of people referred to our service in 2024 had English as their first language. Meaning our interpreting and translation costs are increasing significantly.

People experiencing rough sleeping

During the review our attention was drawn to the findings of Galvanise 2019, a report on street homelessness in the city.[38] The report found that:

- In Brighton & Hove people experiencing rough sleeping are predominantly males from the UK in their late 30s to mid 50s. They most often answered that they are

[38] Keas, Miranda, 2019, *Galvanise Brighton & Hove: Findings from Galvanise 2019. Part of Brighton & Hove's Campaign to End Street Homelessness*.

sleeping rough in Brighton & Hove because they were living here when they became homeless, or because they have family or friends here.

- One fifth of the people sleeping rough spoken to during Galvanise had been in local authority care as a child.
- 18% of people cited a relationship breakdown as the reason for becoming homeless the first time. Other common reasons for becoming homeless were traumatic events such as abuse, coming out of prison with nowhere to go, and job loss.
- People want jobs but last time and this time shows that homelessness still happens to people who are working.
- Many people surveyed experience cycles of going in and out of prison, and experience cycles of being housed and returning to the streets. This suggests a need for more consistent ongoing support and further examination of how to break these cycles.
- 40% of people said they have a serious or chronic health issue and almost a quarter are not registered with a GP
- Whilst some people have chosen to sleep in Brighton & Hove because it feels safe, safety is a real concern for many rough sleepers and 45% have been the victims of violence since becoming homeless
- 61% of people feel they have a mental health issue but only 27% are receiving support or treatment for this. Additionally, a few people expressed having made suicide attempts or having thoughts of suicide, indicating the severity of risk of untreated mental health.
- Day centres and the library are really relied on and valued by rough sleepers
- There is a real demand for more weekend services and many suggestions for additional services that would be useful
- Unsurprisingly, the main things that people want help with are support and housing. However, the availability of housing is a concern for rough sleepers, as is the difficulty in navigating housing systems and finding landlords who will house them
- The desires that people expressed for the future are much the same as many other people: wanting somewhere to live, stability, a family, a job.

Migrants, refugees and asylum seekers

Three migrant homelessness case studies were submitted by Voices in Exile. The case studies highlighted a number of issues including:

- Inadequate recognition of vulnerability
- Systemic issues in the assessment process leading to non-priority decisions
- Post-asylum claim homelessness support is lacking
- Compounding impacts on already vulnerable individuals

- The need for specialist legal and medical support for homeless migrants

Sussex Interpreting Service submitted 4 case studies highlighting the following issues:

- Inadequate language support, poor communication and clients unable to understand the process and consequences of key decisions
- Complex housing systems are particularly difficult to navigate without language support.
- Rapid transitions, particularly from asylum seeker accommodation creates additional hardship and compounds vulnerability
- Inadequate assessment of vulnerability, with medical evidence requirements, and mental health needs and complex needs of single people not taken into account.
- Exclusion from the private rental market, precarious housing situations and accumulation of rent arrears and debt
- System inefficiencies with expensive tribunal processes, multi-agency interventions instead of early intervention and repeat referrals and extended support periods
- Mistrust and miscommunication between applicants and housing support officers

Evidence from engagement activity

We held 2 whole system engagement events as part of the review process, plus a number of follow meetings with those who could not take part. We also organised 2 online workshops for NHS providers and commissioners, a workshop for councillors and attended other network and forum meetings to gather input.

The following thematic analysis suggests that while Brighton & Hove has significant challenges in addressing homelessness, there are also opportunities for system improvement through better coordination, early intervention, and innovative approaches to both prevention and support.

1. Increasing complexity of individual vulnerabilities & needs
    - Mental health emerges as a dominant concern
    - Multiple, compound needs frequently highlighted
    - Substance use and recovery challenges
    - Trauma histories and impacts
    - Neurodiversity and learning disabilities
    - Domestic abuse survivors
    - Care leavers
    - Impact of adverse childhood experiences
    - Complex needs requiring sustained support

2. Other emerging trends & concerns

- Concerns about young people's homelessness
- Rising numbers of refugees/asylum seekers
- More women experiencing homelessness
- Impact of cost-of-living crisis
- Changing demographics
- Hidden homelessness
- Brexit impacts

3. Systemic & structural issues
    - Housing market pressures (high rents, limited supply)
    - Benefits system limitations & Local Housing Allowance inadequacy
    - 'Rent trap' preventing work and progression
    - Impact of austerity on services
    - Complex planning restrictions
    - Geographical constraints of Brighton in terms of development potential
    - Private rental sector barriers (deposits, guarantors, discrimination)
    - AirBnB and second homes reducing housing stock
    - Limited social housing availability

4. Existing service strengths
    - Range of specialized support services
    - Strong peer support initiatives
    - Multi-disciplinary approaches
    - Trauma-informed services
    - Various accommodation pathways
    - Good third sector provision
    - Volunteer engagement
    - Specific support for diverse groups

5. Service delivery challenges
    - Crisis management vs prevention
    - System blockages preventing move-on
    - Support discontinuity
    - Limited specialized accommodation (women, couples, LGBTQ+, young people)
    - Fragmented pathways
    - Staff capacity issues
    - Out-of-area placement complications
    - Data and monitoring gaps
    - Coordination challenges between services

6. Prevention & early intervention needs
    - Education and life skills gaps
    - Limited early warning systems
    - Need for better tenancy sustainment support
    - Financial literacy support
    - Earlier mental health intervention

- Better identification of at-risk individuals
- Prevention duty awareness
- School-based prevention

7. Resourcing & Partnership Issues and Opportunities
    - Funding uncertainty
    - Opportunities for better business engagement
    - Better cross-service coordination
    - Partnership working challenges
    - Resource optimization opportunities
    - Joint commissioning potential
    - Better use of existing assets
    - Need for sustainable funding models

8. innovation & creative solutions opportunities
    - Potential for centralized hub service model
    - Better use of peer support
    - Digital coordination improvements
    - Alternative housing models
    - Business community engagement
    - Devolution possibilities
    - Learning from other cities
    - Personalized budget approaches

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Draft homelessness and rough sleeping strategy 2025 to 2030

Engagement and consultation report

Brighton & Hove City Council

1. Introduction

This report outlines the engagement and consultation activity which has informed the development of the homelessness and rough sleeping strategy 2025 to 2030. It summarises findings from the public consultation on a draft strategy and the council' initial response.

Under the Homelessness Act (2002) all local housing authorities must have a homelessness strategy based on a review of all forms of homelessness in their district. The strategy must be renewed every 5 years. The statutory *Homelessness code of guidance for local authorities* sets out how this process should be undertaken.[1] Section 2.10 of the guidance states that that 'Housing authorities must consult public or local authorities, voluntary organisations or other persons as they consider appropriate before adopting or modifying a homelessness strategy. Housing authorities will also wish to consult with service users and specialist agencies that provide support to homeless people in the district.'

The first phase of the project was a review of homelessness in the city. Stakeholder and partner engagement began in October 2024 with the formation of a multi-agency project steering group. Early engagement included a call for evidence in December 2024, followed by workshop events to share evidence and map services and gaps.

In the second phase, between April and August 2025 we engaged with partners to develop proposed priorities and areas for focused action in the strategy. This process also led to the inclusion of a dedicated chapter on tackling homelessness in children, families and young people and 3 commitments to inform delivery.

Public consultation on a draft strategy ran for 7 weeks from 8 September to 26 October 2025. When the consultation closed, we had received 154 responses. Of these, 132 were from individuals and 22 were submitted on behalf of groups, networks and organisations. Most were submitted online through Your Voice, the council's consultation platform. There were 21 paper surveys submitted and a small number of email responses.

Section 2 of the report summarises the key themes and issues arising from public consultation on a draft strategy. We received many detailed responses and have therefore summarised and grouped feedback into themes.

Whilst there was broad support for the proposed priorities and areas for action, there were different, sometimes conflicting, views on some issues. These reflect the views

[1] Ministry of Housing, Communities and Local Government, 2025, Homelessness code of guidance for local authorities

and opinions of those who responded to the consultation and do not represent the position or policies of the council. Respondents highlighted gaps and areas where they thought the strategy could be improved. Although we are not able to respond here to every point made, we will share the detailed feedback with relevant council officers and use this information to inform our action and service planning.

Section 2 also sets out the council's initial response to feedback and identifies how we plan to take forward key issues. Action as a result of feedback is likely to include one or more of the following: amendments to the strategy itself; inclusion of specific actions, deliverables and targets in the strategy delivery plan; feedback on work already underway; and discussion with elected members of the council on issues where the council does not have the power or the resources to act, but where it may wish to lobby central government.

Section 3 outlines the engagement and consultation process.

The report should be read alongside the *Review of homelessness in Brighton & Hove 2025*. This summarises the evidence and feedback submitted by partners and stakeholders, including people with lived experience of homelessness, during the review.

Feedback from engagement and consultation has also informed the Equality Impact Assessment which will be published alongside a report to the council's cabinet for decision.

2. Key themes from the public consultation

The thematic analysis in this section is derived from 154 consultation responses, 487 comments, and 1,912 coded segments of the free text responses to consultation questions.

2.1 Overall levels of support for proposals

There were high levels of support from respondents across the proposed priorities, areas for focused action, the proposed children's chapter and 3 commitments. Levels of support for proposals ranged from 82.7% to 93.4% of respondents agreeing or strongly agreeing with specific proposals). A breakdown can be found at Appendix 2.

The proposals in the draft strategy were developed collaboratively with our partners and other stakeholders, including people with lived experience of homelessness. When these were tested in the public consultation, levels of support were consistently high across the individual responses (n=132) and those submitted on behalf of groups or organisations (n=22) with slightly higher levels of support from groups and organisations. Groups and organisations showed 100% support for proposals on temporary accommodation and the children, families and young people chapter.

There were similar levels of support for our proposals between people who told us they had lived experience of homelessness or those who been at risk of homelessness, either currently or in the past (n=61) compared to those without lived experience (n=71). People with lived experience showed slightly higher levels of support for all proposals than those without. The most notable differences were stronger support for action to improve the supply and quality of temporary accommodation, supporting people to stay in their home or to find alternative accommodation, targeted prevention for rough sleepers, and integrated services for people with Multiple Compound Needs.

Initial response
There is very broad and strong support for proposals in the draft strategy across key stakeholders and members of the public. Based on feedback on the need to improve joined-up working between services we have amended priority 3 to recognise the need for greater collaboration and integration. The other proposed priorities, areas for action, inclusion of a children, families and young people chapter and the 3 commitments remain unchanged in the final strategy.

2.2 Prevention and early intervention

Theme: Early intervention and risk detection
While there was strong support for early intervention principles, consultees raised concerns about the capacity and effectiveness of current systems to identify people at risk before crises developed. Questions were posed about how early identification would work in practice, who would be responsible for flagging risks, and whether sufficient resources existed to respond effectively once risks were identified. There

was particular concern about reaching people who might not naturally engage with traditional services, and whether universal services like schools and healthcare providers had adequate training and capacity to recognise and respond to early warning signs of housing instability.

A critical tension was highlighted between the strategy's prevention ambitions and the reality of constrained resources. Consultees noted that while the consultation was seeking views on expanding prevention services, the council had previously cut funding to some prevention activity. There were concerns about whether prevention commitments could be delivered in practice. Respondents emphasised that prevention required upfront investment that would only show returns over time.

Respondents recommended building stronger connections between homelessness services and universal touchpoints where people might first show signs of housing difficulty. This included schools, Family Hubs, GP surgeries, DWP and community organisations. They called for clear training and protocols to help frontline staff in these settings recognise risk factors and know how to make appropriate referrals. Consultees emphasised that early identification systems would only be effective if backed by sufficient resources to provide timely, appropriate interventions when people were identified as at risk.

Consultees were clear that prevention represented one of the most critical investments the council could make and called for this to be stated explicitly in the strategy. They recommended that prevention funding should be protected and ideally increased, recognising that effective early intervention could reduce the much higher costs of crisis responses and temporary accommodation. There were calls for the strategy to acknowledge funding challenges openly while making a clear commitment to prioritising prevention resources despite broader budget pressures.

Initial response
Prevention is at the core of the strategy. A shift upstream is signalled in the strategy and we recognise the key role of universal services in delivering this. We also acknowledge the significant challenge in making this shift. We have identified promising international and UK evidence-based practice and have initiated a test and learn project to develop a predictive risk model as a first step.

2.3 Temporary accommodation

Theme: Quality and standards
Many respondents expressed concerns about the quality and suitability of temporary accommodation. This included safety, both in terms of facilities and risk from other residents. Consultees reported problems with infestations, damp and mould, and broken fixtures that were not addressed. The impact on children was emphasised, with concerns that poor quality temporary accommodation was adversely affecting their wellbeing and development. There was frustration that the current system was not delivering environments where residents could thrive or maintain dignity.

To address their concerns, consultees recommended establishing minimum standards for all temporary accommodation, with particular attention to health and

safety requirements. They called for robust monitoring systems with clear enforcement mechanisms and consequences for providers failing to meet standards. Regular property inspections were proposed to ensure ongoing compliance, alongside timely repairs and maintenance protocols. Respondents emphasised the need for properties that were not just safe but conducive to wellbeing, recovery, and family life.

Initial response
As well as aiming to reduce the overall number of people living in temporary accommodation, the strategy acknowledges that there will continue to be a need for such accommodation. The second priority set out in the strategy is to improve the quality of temporary accommodation and the experience of people living in temporary accommodation. From our review and feedback from consultees we believe that improving interim accommodation (formerly termed emergency accommodation) is a priority. In response to feedback we have added an action to develop and publish contractual standards for the interim accommodation that we purchase. The Renters' Rights Act extends protections already in place in social housing to private rented accommodation, including temporary and supported accommodation. This, alongside forthcoming regulations for supported housing, will give the council additional levers to drive up standards.

Theme: Out-of-area placements
The use of out-of-area placements was also mentioned as a key issue, particularly regarding the impact on families with children. Consultees highlighted how these placements disrupted education continuity, separated families from established support networks, and created additional trauma for children already experiencing homelessness. Lack of transport connections for some, made it difficult to maintain schooling, healthcare, and links with friends and family. There was also lack of clarity about the reasons why some families and individuals were made out-of-area offers and what happened if people declined such offers.

Respondents advocated for minimising or eliminating out-of-area placements altogether. Where such placements were unavoidable, they called for them to be as close as possible to Brighton & Hove, preferably within neighbouring areas that would allow families to maintain key connections. Consultees recommended transparent criteria for when out-of-area placements might be used and clear support for families to maintain links with their established networks. Better tracking of placement locations, durations, and outcomes was proposed, alongside measures to understand and address the reasons families might refuse out of area temporary accommodation.

Initial response
We have made a commitment in the strategy to minimise the use of out of area placements and B&B for families with children. It is likely that there will always be a need for some out of area placements, for example on safety grounds. Ongoing work to increase the supply of local good quality temporary accommodation will help us achieve the overall reduction we want to achieve.

Theme: Move-on pathways

Consultees identified significant challenges around move-on from temporary accommodation into settled housing. The extended duration of stays in temporary accommodation was highlighted as problematic, with some respondents noting instances of families remaining in temporary settings for years. This was attributed to insufficient move-on pathways and limited availability of suitable permanent accommodation. There were concerns that the system was becoming stuck, with people unable to progress despite being ready to move on.

To improve pathways, respondents recommended clear timescales and expectations for temporary accommodation stays, coupled with dedicated support to help residents prepare for and transition to permanent housing. They emphasised the need for increased provision of affordable, suitable permanent accommodation that would create the capacity for people to move on. Better coordination between temporary and permanent housing services was seen as essential to creating smoother transitions and preventing people from becoming 'stuck' in temporary arrangements.

Initial response
If we are to reduce the number of people living in temporary accommodation, we need to improve move-on. This is a core element of our approach in the strategy.

2.4 Support and service integration

Theme: Multiple compound needs
Respondents highlighted gaps in support for people with multiple compound needs, including those experiencing co-occurring mental health difficulties, substance use, and homelessness. Current services were described as fragmented, with poor coordination between different providers and unclear referral pathways. Consultees noted that people were often passed between services without receiving comprehensive, joined-up support. There was particular concern about long waiting times for mental health services and the challenges of accessing appropriate support for those with both mental health needs and housing instability.

To address these gaps, respondents called for integrated services that provide holistic support for people with multiple compound needs. This included co-located teams bringing together housing, health, and social care expertise, with shared assessment processes and coordinated care planning. Consultees recommended establishing a dedicated team focused specifically on people with multiple complex needs, with the skills and resources to provide intensive, sustained support. Better partnership working between statutory services, health providers, and voluntary sector organisations was seen as essential to creating truly integrated pathways.

Initial response
Our third priority recognises the need for better collaboration and service integration. We believe that the ways of working between the NHS, social care, housing and the voluntary sector developed through the Changing Futures programme shows the way forward. We will take this work forward with our partners through the development of Integrated Community Teams and led by a new multiple compound needs partnership.

Theme: Trauma informed approaches
There was widespread support for the need for services to adopt trauma-informed approaches, with many people experiencing homelessness having experienced significant trauma in their lives. However, consultees raised questions about whether staff had sufficient training and support to deliver it effectively. Concerns were expressed about services potentially re-traumatising people through inflexible rules, perceived judgemental attitudes, and failure to recognise people's trauma responses and how this impacted their behaviour.

Respondents recommended comprehensive training for all staff working with people experiencing homelessness to help them understand trauma and its impacts. They called for service design that recognised trauma responses rather than penalising them, with greater flexibility to accommodate people whose trauma might manifest in behaviours that services found challenging. Consultees emphasised the importance of building trust through consistency, transparency, and genuine person-centred approaches that gave people agency and choice in their support.

Initial response
We have committed to taking forward a trauma informed approach in the strategy and acknowledge that workforce capacity, capability and improving systems and processes are all part of this. We will continue to roll out staff training and to monitor the impact of changes on people's experience of using our services. Our commitment to working with people with lived experience of homelessness will help us design and deliver the improvements we want to see.

Theme: Health and social care integration
Respondents identified significant challenges in achieving effective integration between housing, health, and social care services. Current arrangements were characterised as siloed, with different organisations working to different priorities, timescales, and eligibility criteria. This created barriers for people trying to navigate multiple systems simultaneously, particularly those with complex needs requiring support from several services. Consultees noted problems with information sharing, conflicting advice from different agencies, and gaps between services that people could fall through without adequate support.

To improve integration, consultees recommended establishing formal partnership structures with clear governance, shared objectives, and joint accountability for outcomes. This included developing integrated care pathways that followed people's journeys rather than organisational boundaries, with named workers coordinating support across different agencies. Respondents emphasised the need for better information sharing protocols that allowed relevant information to be shared appropriately while respecting privacy. There were calls for joint commissioning approaches that could fund integrated services more effectively than traditional separate contracts.

Initial response
We believe we have already made progress in improving joint and integrated working. The structural alignment of adult social care and housing services is one area where we are working towards greater integration. We are also collaborating with NHS commissioners and providers to make improvements in a number of areas

including mental health services, learning disability and autism, and drug and alcohol services. See also the response to Theme: Multiple compound needs above.

Theme: The role of the voluntary, community and social enterprise sector
Consultees highlighted the vital role of voluntary and community sector organisations in the homelessness system but also revealed concerns about how these organisations were engaged and supported. Consultees noted that voluntary sector partners often had deep expertise and relationships with communities that statutory services struggled to reach, yet sometimes felt their contributions were undervalued or that partnerships were not genuinely collaborative. There were concerns about short-term funding that made it difficult for organisations to plan effectively or maintain specialist staff.

Respondents called for partnership approaches that recognised voluntary sector organisations as equal partners. This included involving them meaningfully in strategic planning and decision-making, not just service delivery. Consultees recommended longer-term funding arrangements that would allow organisations to develop sustainable services and retain skilled staff. There was emphasis on the need to recognise and draw on the distinctive strengths of different partners, including voluntary organisations' ability to provide flexible, person-centred support and reach communities that might be wary of statutory services.

Initial response
We have re-framed our partnership commitment to working as equals with all our partners and with people with lived experience. We realise that longer term financial stability would benefit not only the voluntary, community and social enterprise sector but the people they support. The strategy makes it clear, however, that the current financial position for the council is highly uncertain and that resources across the public sector are shrinking. This means that we must do things differently. In some cases it means we will need to reduce funding or to reprioritise how available funding is used. We will work with the sector to ensure that this is done fairly and transparently.

2.5 Children, families and young people

Theme: Impact of homelessness on children's wellbeing
The consultation revealed significant concern about the impact of homelessness and temporary accommodation on children's wellbeing, development, and life chances. Respondents highlighted how poor-quality temporary accommodation, frequent moves, and out-of-area placements disrupted children's education, damaged their mental health, and limited their ability to maintain friendships and support networks. There was recognition that children were bearing the trauma of their families' housing crises, with potentially long-lasting effects on their development and future outcomes.

To protect children, consultees called for their needs to be central to all decisions about temporary accommodation placements and support. This included ensuring that temporary accommodation was of high quality, stable, and as close as possible to children's schools and established support networks. Respondents recommended prioritising families with children for move-on into permanent housing and ensuring

that children had access to appropriate support services to address any developmental or emotional difficulties arising from their housing situation. There were calls for better coordination between housing services and children's services to ensure holistic support for children experiencing homelessness.

Initial response
The strategy addresses many of the points raised in the consultation. Partnership working, especially with children's and universal services will be critical for preventing homelessness and reducing the negative impact of homelessness on children if it does occur. Families with children are already a priority group for move on into settled housing, however, the lack of suitable family sized social and affordable housing means that waits are unacceptably long. Our housing strategy prioritises increasing the supply of affordable family sized homes. The need for a greater supply of affordable homes is also identified in our Strategic Housing Market Assessment 2023. Recommendations will feed through into the long-term City Plan which is currently under review. This will set new targets for housing supply.

Theme: The distinct needs of young people
Consultees identified gaps in provision for young people experiencing homelessness independently of family units, including care leavers and young people experiencing family breakdown. Current services were seen as poorly resourced. There was concern that if prevention strategies focused heavily on family-based approaches they could neglect the significant cohort of young people operating outside family structures, for whom school-based prevention for example would not be relevant or sufficient.

Respondents called for tailored pathways specifically designed for vulnerable young people, recognising their distinct needs and experiences. This included increased staffing dedicated to young people's services, particularly for care leavers who required intensive support to sustain their tenancies. Consultees recommended better data collection and monitoring around youth homelessness, including specific measures for young people rough sleeping, young people in emergency accommodation, and care leavers in temporary accommodation. There was concern that Brighton & Hove as a city with many young adults, has particular challenges around youth homelessness that needed explicit acknowledgement in the strategy.

Initial response
We have amended the strategy to better recognise the distinct needs of young people, especially those outside families. We have also included additional measures to track progress in relation to young people. We acknowledge that there is more to do in terms of improving data collection and monitoring youth homelessness in the city and will work with our partners in the Young Homeless Working Group to take this forward.

2.6 Equality, diversity and inclusion

Theme: Specific groups and protected characteristics
Respondents highlighted gaps in provision for various groups with protected characteristics or specific vulnerabilities. Concerns were raised about older people experiencing homelessness, who were seen as an under-acknowledged group with

distinct needs around health, mobility, and support. Similar gaps were identified for Gypsies, Roma, and Travellers, including van dwellers, who face challenges accessing appropriate accommodation and services.

Several consultees recommended that the strategy should explicitly address the needs of specific groups with protected characteristics, with action plans for cohorts currently under-served. This included ensuring that services were culturally appropriate and accessible, with staff training on equality issues and the particular challenges faced by different communities. Respondents called for better data collection disaggregated by protected characteristics to understand who was experiencing homelessness and whether services were reaching all communities equitably.

Initial response
We acknowledge that there were gaps in the draft strategy in relation to homelessness in older people and gypsies, Roma and travellers (including people living in vans and other vehicles). There is an ongoing needs assessment into the accommodation needs of gypsy, Roma and traveller groups and we will take its findings into account in delivering the strategy. From our review and equality impact assessment there is an indication of several issues affecting older adults and we have now included a commitment in the strategy to better understand the needs of the increasing numbers of older adults seeking support and ensure that our services meet their needs.

Theme: Inclusive or separate provision for specific groups
A significant area of differing opinion emerged around whether services should be inclusive or provide separate services for specific groups. Some consultees advocated for mainstream services to be designed inclusively from the outset, arguing that separate provision could be stigmatising or inadequate. Others contended that certain groups require specialist provision that recognised and responded to their specific experiences and needs, such as women-only services for survivors of domestic abuse or specialist provision for people from particular cultural or religious backgrounds. The consultation highlighted differing views on trans inclusion, with some respondents calling for trans-inclusive provision in single-sex services and others opposing this approach.

Rather than prescribing a single approach, respondents generally recommended that the strategy should support a range of provision models, recognising that different approaches might be appropriate for different services and groups. The emphasis should be on ensuring that all provision, whether mainstream or specialist, was of high quality, properly resourced, and genuinely met the needs of the people it served. Consultees called for ongoing dialogue with communities about what models of provision they found most helpful and responsive.

Initial response
We support the principle of a range of provision models. We will work to ensure that all our services are inclusive but where we have a legal obligation or there is a clear case for separate provision, we will work to ensure that this is in place to meet relevant needs. We also commit to dialogue with our partners and with communities to develop appropriate models of provision.

2.7 Root causes of homelessness and systemic issues

Theme: Housing supply and affordability
Many respondents draw attention to the fundamental challenge of a lack of affordable housing supply in the city. Consultees recognised that even the best prevention and support services could not fully address homelessness while the supply of genuinely affordable, suitable housing remains inadequate to meet need. The loss of social housing stock through Right to Buy was highlighted as having long-term consequences for housing availability, while new build rates are insufficient to replace lost stock or meet growing demand.

Respondents called for the strategy to clearly articulate the need for increased social and affordable housing supply. Consultees recommended that the council should use its voice to advocate at national level for policy changes including ending Right to Buy, increased investment in social housing, and introducing rent controls. Locally, they called for ambitious targets for new social housing development and creative use of all available tools to increase affordable supply, including use of council-owned land and partnerships with housing associations.

Initial response
The need for more affordable homes in the city to meet the differing needs of our communities is acknowledged in the strategy. As part of a broader strategic framework, this issue is addressed in our housing strategy, *Homes for Everyone*, agreed in 2024. This sets a target for the delivery of 2,000 additional affordable homes by 2029. Work is also underway to review and update the City Plan. This is the key document that will set long term housing goals for the city and the infrastructure to support additional homes. We also see the creation of a mayoral authority for Sussex and Brighton and the reorganisation of local government in the region as an opportunity to work together to deliver new homes.

Theme: The private rented sector
The private rented sector was identified as both a potential pathway out of homelessness and a source of housing instability. Consultees raised concerns about the quality and affordability of private rented accommodation, with many properties unaffordable on housing benefit rates and some falling below acceptable standards. The Renters Reform Bill (now Act) was seen as creating both opportunities and challenges that the strategy needed to address.

Respondents recommend that the strategy should reflect the changing private rented sector landscape, considering how legislative reforms might improve conditions in the private rented sector and what new challenges they might create. They called for better recording and understanding of why people lost private rented tenancies, to inform more effective prevention. Consultees emphasised the need for services supporting people to access and sustain private rented tenancies, including navigation support, tenancy training, and mediation. There were calls for stronger enforcement against rogue landlords and clearer standards for privately rented accommodation used in homelessness pathways.

Initial response

Our housing strategy sets out our overall policy position on working with the private rented sector. We want to work constructively with landlords and their networks to ensure that we have the good quality homes we need in the city. We are clear, however, that we will not tolerate rogue landlords. Recent legislation means that standards already in place in the social housing sector will be applied to the private rented sector. We will work with the sector to support implementation of the new legislation and, where necessary, take action to enforce it.

Theme: The benefits system
The inadequacy of benefit levels, particularly in high-cost areas like Brighton & Hove, was identified as a fundamental driver of homelessness. Consultees highlighted that Universal Credit levels were insufficient to meet housing costs, with the benefit cap creating particular difficulties for families. The interaction between employment and benefits was also problematic, with young people in supported accommodation potentially losing Local Housing Allowance eligibility when gaining employment, pushing them into rent arrears. These structural issues in the benefits system were seen as creating ongoing flows into homelessness that local services struggled to respond to.

While recognising that benefits policy is set nationally, respondents called for the strategy to acknowledge these systemic issues explicitly and commit to advocacy at national level. Specific recommendations included campaigning for Brighton & Hove to have benefit caps aligned with London levels given similar housing costs, increasing Local Housing Allowance rates to cover actual rent levels, and reforming rules around employment and housing benefit eligibility. Consultees emphasised the need for better benefits advice and support locally to help people maximise their entitlements within the current system.

Initial response
The benefits system impacts across our 3 priorities, with the consequences identified by respondents. A local level, we can work with our partners to support people at risk and those experiencing homelessness to maximise their income and mitigate some of the anomalies and disparities identified in the consultation. We will also discuss with elected members the council's role in lobbying for changes to national policy.

Theme: National policy
Respondents acknowledged that homelessness is impacted by national policy decisions beyond local control, including housing policy, welfare reforms, and public spending constraints. The Renters Reform Act will reshape the private rented sector with implications for both prevention and housing supply. Central government funding for homelessness services is insufficient to meet need, while broader austerity policies have reduced services that helped prevent homelessness such as mental health and employment support.

Consultees recommended that the strategy should be clear about this national context and the limitations it creates for local action. Rather than assuming the strategy can solve problems that required national policy change, it should explicitly identify areas where national advocacy was needed. Respondents called for the council to use its voice at the national level to argue for regulated rents, increased social housing investment, adequate benefits levels, and sufficient funding for

homelessness services. The strategy should set out how the council will engage in these advocacy efforts alongside its local delivery commitments.

Initial response
We welcome the reforms introduced by the Renters' Rights Act and will work to implement these locally. We will work with our neighbouring authorities and through our networks to lobby central government on the relevant policy issues including a fair funding settlement for local government, including funding for homelessness prevention and support services.

2.8 Delivery of the strategy

Theme: Implementation and follow-through
Some respondents were sceptical about the delivery of the strategy and called for the inclusion of more specific actions and deliverables. A few were also sceptical about the potential for real change or improvement, suggesting that past initiatives have not led to tangible impact from their perspective. Some asked for more clarity about how the strategy will be implemented and how progress will be tracked. The importance of using data to understand residents' needs and inform the delivery of the strategy was also mentioned.

Initial response
This is intended to be a short, high-level document setting out our priorities and where we will focus our activity over the next 5 years. We will work with our partners to develop a more detailed delivery plan. This will include actions, milestones, key performance indicators and targets. This first year will reflect activity that is planned or in progress and where funding is secured. However, we will use the strategy to guide action and financial planning, including seeking additional funding, for subsequent years. We will update on our progress and refresh the delivery plan on an annual basis.

Theme: Financial challenges
Some respondents argued that there is a fundamental tension between the strategy's ambitious vision and the reality of constrained resources. Consultees noted contradictions between stated ambitions and actual decisions, with some services being decommissioned while the strategy calls for better provision. This created scepticism about whether commitments could be delivered and concern that the strategy might be a wish-list rather than a realistic action plan. The role of central government underfunding was highlighted as a critical contextual factor that needed acknowledgement.

Respondents recommended that the strategy should be honest about funding challenges while making clear which actions were priorities for available resources. Rather than avoiding discussion of constraints, consultees wanted to see realistic assessment of what could be achieved with different funding scenarios and clear prioritisation of actions. They called for the strategy to make the case for investment in homelessness services, including the costs of not preventing homelessness and the returns from effective early intervention. There was emphasis on the need for joint funding and commissioning approaches that could make available resources work more effectively.

Initial response
We believe that we have been open in the strategy about the financial challenges facing the council. There are similar pressures on many of our partners. The actions we deliver will be shaped by the strategy, but this will need to be done in the context of our statutory duties and our financial and other resources. We will seek to collaborate with other organisations to make the most of our collective resources to deliver improved outcomes for the city.

Theme: Workforce
Staffing capacity emerged as a concern, with consultees stating that homelessness services were understaffed and that waiting times for support were too long. Specific gaps were identified in young people's services, with reportedly only one council officer supporting young people. Beyond numbers, respondents also raised questions about workforce skills and training, particularly around trauma-informed practice, equality and diversity, and working with complex needs. There was recognition that delivering the strategy's ambitions would require appropriately skilled and supported staff.

Consultees recommended increased staffing levels in key areas, particularly youth homelessness support and prevention work. They called for investment in workforce development including training in trauma-informed approaches, mental health awareness, and cultural competency. Respondents emphasised the importance of supporting staff wellbeing, recognising that homelessness work was demanding and that staff burnout could undermine service quality. There were suggestions for developing specialist teams focused on particular cohorts or needs, alongside development of staff in universal services to help them recognise and respond to homelessness risks.

Initial response
The feedback and suggestions made by respondents broadly reflects our assessment. There have been significant developments, including the ongoing roll out of trauma, mental health and cultural competency training. We acknowledge that there is more to do and will take this forward in the delivery of the strategy. The scale of the challenge facing us means that we will need to develop new ways of working as we do this.

Theme: Monitoring and accountability
Consultees highlighted gaps in current data collection and monitoring and also called for comprehensive and meaningful measures of progress. Existing proposed indicators were seen as missing key cohorts, particularly young people experiencing homelessness outside family units. There was concern that without robust monitoring, the strategy's commitments might not translate into real change and that gaps in provision might remain hidden. Respondents emphasised the importance of transparency in reporting progress.

Recommendations included developing a comprehensive set of performance indicators that covered all priority groups and measured both process and outcomes. Consultees called for specific measures around young people rough sleeping, young people in emergency accommodation, care leavers in temporary accommodation,

and length of stay in temporary accommodation. They recommended annual review of progress with evaluation and clear accountability mechanisms. Respondents emphasised the importance of disaggregating data by protected characteristics to understand whether services were reaching all communities equitably and to identify any disparities in outcomes.

Initial response
We recognise that there is more need to improve data collection and monitoring progress. Our systems and processes need to be strengthened and more sophisticated data capture and use is still needed in the areas indicated by consultees. We have identified a number of specific areas in our review of homeless and Equality Impact Assessment where we think we can improve.

2.9 Other issues

Beyond the themes above, consultees provided feedback on the wording of the strategy document itself. There were requests for greater clarity in terminology or a glossary of terms.

Initial response
A number of changes have been made to the strategy document wording based on feedback. We have also included a glossary of terms as suggested by several respondents.

3. The engagement and consultation process

The review of homelessness

Our process of engagement began with the formation of a project steering group in autumn 2024, bringing together internal and external stakeholders. This was led by the Director of Housing People Services and comprised service leads from council housing services, adults' and children's services, public health, NHS, the voluntary, community and social enterprise sector (Homelessness & Rough Sleeping Network). Common Ambition helped bring the voices of people with lived experience into the work of the steering group.

Three multi-agency groups informed the work of the project steering group - covering data, engagement and consultation and a frontline services reference group.

Regular in person updates were provided to the Cabinet Member for Housing and the Cabinet Adviser for Homelessness.

In December 2024 we put out a call for data and evidence to inform our review of homelessness. Invitations to submit evidence was sent to a mailing list of 130 individuals and organisations. The review was also promoted through the Homelessness and Rough Sleeping Network and Community Works mailing lists.

Organisations submitting evidence for the review were:

- Arch Healthcare
- Brighton & Hove City Council Encampments Team
- Changing Futures Sussex
- Clock Tower Sanctuary
- Common Ambition
- Justlife
- LGBTQ Switchboard
- Oasis Project
- Rise
- Safe Haven Sussex
- Sisters Salon
- Sussex Interpreting Service
- Sussex Nightstop
- University of Sussex Students' Union
- Voices in Exile
- YMCA Downslink Group

The evidence provided was a mixture of quantitative and qualitative information and included anonymised casework data, reports, research findings, case studies and presentations. A summary of the issues identified is set out in the *Review of homelessness in Brighton & Hove 2025*.

We organised two stakeholder workshops in January and February 2025, the first to share and map data and evidence, the second to identify relevant services and resources. Around 40 participants, including frontline workers and people with lived experience of homelessness, took part in each workshop. We also held a separate event for NHS commissioners and providers in late January 2025. In March 2025 we held an online workshop for those unable to take part in earlier engagement activities.

Throughout the review and development of the strategy we regularly engaged with the strategic leads group of the Homelessness and Rough Sleeping Network of voluntary, community and social enterprise organisations.

We provided a hybrid in person and online briefing, open to all councillors, in early April where we presented initial findings from the review.

Developing the draft strategy for consultation

The vision of ‘A better Brighton & Hove for all’ with ‘homes for everyone’ at its core was taken from the council plan 2023 to 2027. The housing strategy 2024 to 2029 has tackling homelessness and meeting housing need as one of 5 priorities.

Through engagement during, and following, the review of homelessness, three proposed priorities and areas for focused action for each, were developed and tested with our partners. We also presented review findings and tested proposals with council directorates and the corporate leadership team.

We held sessions with the City Leadership Board and the Violence Against Women and Girls Network, the West Area Health Forum, the Homeless Operational Forum, Young Homeless Working Group, and Safe Haven Sussex. A dedicated workshop was organised to engage with NHS colleagues. Proposals were taken for comment as they developed to the Common Ambition steering group of people with lived experience of homelessness and to the frontline services reference group.

By the end of August, we had a draft strategy ready to test through formal public consultation. We shared a pre-consultation draft with the Homelessness and Rough Sleeping Network strategic leads group for comment in advance of the formal launch.

Formal consultation on the strategy
The consultation on the draft strategy was launched on Your Voice, the council's consultation platform, on 8 September 2025. The project group reviewed progress fortnightly and considered potential changes to the consultation approach. This included reviewing responses received across the city's demographics. Based on these reviews the project group adjusted the consultation plan and included further targeted promotion to older people's organisations and to groups and individuals working with migrants, refugees and asylum seekers. The consultation closed on Sunday 26 October 2025.

Promoting the consultation
Allowing for duplication between the different mailing lists, around 500 individuals, groups and organisations were invited to take part in the consultation. In addition, they were asked to promote the consultation to their members, service users, staff and volunteers. All were sent reminders during the consultation encouraging responses.

An invitation to take part was sent to:

- 130 individuals and organisations on a core stakeholder list
- 250 individuals, groups and organisations on the Migrant and Refugee Forum mailing list.
- 552 Third Sector groups and organisations on the Community Works mailing list
- 25 organisations in the Homelessness & Rough Sleepers Network

Other publicity
The Wave (council staff intranet)
Social media
A range of e-newsletters produced by council services and our partners
100 posters were distributed for display in public buildings, including in housing offices and on service noticeboards.
Plasma screens in council buildings including libraries and family hubs

Face to face engagement
Two in person public consultation events were held during the consultation period, the first at Hove Town Hall and the second at Brighton Town Hall. A series of drop in sessions were arranged at Whitehawk Family Hub, Hangleton Community Centre, JobCentre Plus, the Youth Hub and the Jubilee Library. A dedicated workshop on the children, families and young people chapter was also held.

During the consultation we presented the strategy at the Brighton & Hove Health and Care Partnership Executive Board, the Health and Wellbeing Board, the Community Safety Partnership, People Overview and Scrutiny Committee, and at an event for registered providers of social housing. A session organised for the Combatting Drugs Partnership Board was deferred and held just after the close of consultation, but consultation material had been circulated in advance.

Accessibility

The online survey was hosted on Your Voice, the council's consultation platform. The platform is compatible with international accessibility standards for web content. It also has the option for people to complete a survey in any of the 10 most spoken languages in Brighton & Hove.

Large print, hard copy surveys were available on request by email or phone. An offer to provide the survey in other formats was made on the portal. An Easy Read guide and survey were also made available as hard copy and for download from Your Voice.

Appendix 1 Consultation responses submitted on behalf of groups, networks and organisations

- Arch Healthcare
- BHT Addiction Services
- BHT Sussex
- Brighton & Hove City Council - Adult Social Care Commissioning Team
- Brighton and Hove City Council Strategic Lead Commissioner Domestic Abuse and VAWG
- Brighton & Hove Hotel Association
- Brighton & Hove Older People's Council
- Brighton & Hove Speak Out
- Change Grow Live
- Headway Sussex
- Homelessness and Rough Sleeping Network
- Justlife
- NHS Sussex
- Pathways & Partnerships Housing Options team
- Phase One, BHT Sussex
- RISE
- Seaside Homes
- Sussex Nightstop
- The Clock Tower Sanctuary
- The Clocktower Sanctuary - young people's response
- Voices in Exile
- YMCA Downs Link Group

Appendix 2 Levels of support for proposals

Priority 1: Prevention

Question	Responses	Agree	Strongly Agree	Combined Support
Do you agree with our proposed priority to 'increase our effectiveness in preventing homelessness and rough sleeping'?	**136**	**30**	**95**	**125 (91.9%)**
Early identification of risk and early intervention	134	36	83	**119 (88.8%)**
Support people to stay in their homes or to find a new home	135	32	90	**122 (90.4%)**
Deliver targeted prevention for people at risk of rough sleeping	133	28	89	**117 (88.0%)**

Priority 2: Temporary Accommodation

Question	Responses	Agree	Strongly Agree	Combined Support
Do you agree with our proposed priority to 'improve temporary accommodation pathways and experiences'?	**129**	**29**	**84**	**113 (87.6%)**
Improve move on from temporary accommodation into settled housing	138	29	92	**121 (87.7%)**
Support people living in temporary accommodation	139	31	96	**127 (91.4%)**
Improve the supply and quality of temporary accommodation	136	27	93	**120 (88.2%)**

Priority 3: Support

Question	Responses	Agree	Strongly Agree	Combined Support
Do you agree with our proposed priority to 'provide joined-up support with our partners to people who most need help'?	**128**	**17**	**101**	**118 (92.2%)**
Target support for people who are most vulnerable	138	34	91	**125 (90.6%)**
Create integrated services for people with Multiple Compound Needs	136	25	103	**128 (94.1%)**

Support people experiencing rough sleeping access services and accommodation	138	22	103	**125 (90.6%)**

Chapter on Children, Families and Young People

Question	Responses	Agree	Strongly Agree	Combined Support
Do you agree with our proposal to include a chapter on children, families and young people?	**119**	**17**	**93**	**110 (92.4%)**
Increase early identification of children, families and young people at risk of homelessness through early help and universal services such as schools and Family Hubs	135	22	99	**121 (89.6%)**
Develop our family intervention and mediation services to prevent homelessness	133	27	86	**113 (85.0%)**
Deliver targeted prevention for young people at risk of rough sleeping	134	20	99	**119 (88.8%)**
Support children, families and young people maintain connections to services and support networks	133	26	95	**121 (91.0%)**
Improve standards for children and families living in temporary accommodation	132	18	102	**120 (90.9%)**
Minimise the use of bed and breakfast accommodation and out-of-area placements for families with children	133	14	96	**110 (82.7%)**
Develop tailored pathways for vulnerable young people that meet distinct needs and experiences	133	24	93	**117 (88.0%)**
Ensure that children, families and young people experiencing homelessness receive coordinated protection and support	131	18	101	**119 (90.8%)**
Support care experienced young people who have lived in care and other vulnerable young people to sustain their tenancies	132	19	104	**123 (93.2%)**
Strengthen our support offer for the most vulnerable children and young people	133	19	104	**123 (92.5%)**

Fair and inclusive

Question	Responses	Agree	Strongly Agree	Combined Support
Develop holistic, person-centred and trauma informed services	144	26	101	**127 (88.2%)**
Champion equality, diversity and inclusion	145	28	93	**121 (83.4%)**
Challenge stigma, build trust and promote community integration and social connections	145	30	97	**127 (87.6%)**

Partnership

Question	Responses	Agree	Strongly Agree	Combined Support
Work with people with lived experience to design services and policy	145	31	100	**131 (90.3%)**
Work with government, regional and local partners to tackle the root causes of homelessness	141	26	103	**129 (91.5%)**
Work with the voluntary, community and social enterprise sector to lever in additional resources and expertise to deliver the aims of the strategy	141	29	104	**133 (94.3%)**

Resources

Question	Responses	Agree	Strongly Agree	Combined Support
Ensure our workforce has the knowledge and skills to do their very best	141	21	111	**132 (93.6%)**
Manage our financial resources and assets to ensure best value and financial sustainability	142	29	96	**125 (88.0%)**
Use our information to better understand need, deliver evidence-based solutions and drive innovation	141	29	97	**126 (89.4%)**

General Equality Impact Assessment (EIA) Form

Support:

An EIA toolkit, workshop content, and guidance for completing an Equality Impact Assessment (EIA) form are available on the EIA page of the EDI Internal Hub. Please read these before completing this form.

For enquiries and further support if the toolkit and guidance do not answer your questions, contact your Equality, Diversity, and Inclusion (EDI) Business Partner as follows:

- Economy, Environment and Culture (EEC) – Chris Brown,
- Families, Children, and Learning (FCL) – Jamarl Billy,
- Governance, People, and Resources (GPR) – Eric Page.
- Health and Adult Social Care (HASC) – Zofia Danin,
- Housing, Neighbourhoods, and Communities (HNC) – Jamarl Billy

Processing Time:

- EIAs can take up to 10 business days to approve after a completed EIA of a good standard is submitted to the EDI Business Partner. This is not considering unknown and unplanned impacts of capacity, resource constraints, and work pressures on the EDI team at the time your EIA is submitted.
- If your request is urgent, we can explore support exceptionally on request.
- We encourage improved planning and thinking around EIAs to avoid urgent turnarounds as these make EIAs riskier, limiting, and blind spots may remain unaddressed for the 'activity' you are assessing.

Process:

- Once fully completed, submit your EIA to your EDI Business Partner, copying in your Head of Service, Business Improvement Manager (if one exists in your directorate), Equalities inbox, and any other relevant service colleagues to enable EIA communication, tracking and saving.
- When your EIA is reviewed, discussed, and then approved, the EDI Business Partner will assign a reference to it and send the approved EIA form back to you with the EDI Manager or Head of Communities, Equality, and Third Sector (CETS) Service's approval as appropriate.
- Only approved EIAs are to be attached to Committee reports. Unapproved EIAs are invalid.

1. Assessment details

Throughout this form, 'activity' is used to refer to many different types of proposals being assessed.

Read the EIA toolkit for more information.

Name of activity or proposal being assessed:	**Homelessness and rough sleeping strategy 2025 to 2030**
Directorate:	Homes and Adult Social Care
Service:	Homelessness and Housing Options Temporary and Supported Accommodation
Team:	n/a
Is this a new or existing activity?	New

Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)	Yes – see EIA archive Housing, Neighbourhoods & Communities EIAs

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

Responsible Lead Officer:	Harry Williams, Director of Housing People Services
Accountable Managers:	Alice Morel, Head of Homelessness and Housing Options Aaron Burns, Head of Temporary and Supported Accommodation
Additional stakeholders collaborating or contributing to this assessment:	Steve Morton, Policy & Public Affairs Officer Tom Matthews, Housing Performance Analyst

3. About the activity

Briefly describe the purpose of the activity being assessed:

Under the Housing Act (2002) as amended by the Homelessness Reduction Act (2017) all housing authorities must have in place a homelessness strategy based on a review of all forms of homelessness in their district. The strategy must set out plans for the prevention of homelessness and for securing that sufficient accommodation and support are or will be available for people who become homeless or who are at risk of homelessness. Our current strategy expires this year.

Initial equality analysis was undertaken to inform the Review of Homelessness in Brighton & Hove 2025. The final review will be published alongside the strategy. This final EIA contains data from the review, other national and local data and evidence as well as feedback from consultation and engagement activity.

What are the desired outcomes of the activity?

Commented [CB1]: Recommend including a specific reference to the EIA helping us meet our Public Sector Equality Duty. Include PSED's three aims:

- Eliminate discrimination
- Advance equality of opportunity
- Foster good relations

This Equality Impact Assessment (EIA) helps the council meet the Public Sector Equality Duty including the 3 aims of

- Eliminating discrimination
- Advancing equality of opportunity
- Fostering good relations

It has been produced to inform the development of a draft homelessness and rough sleeping strategy. Equality analysis was initially taken forward as part of a review of homelessness. The EIA has been updated following a 7-week public consultation on a draft strategy.

'Homes for everyone' is a key element of the council's vision of a better Brighton and Hove for all and for a fairer, more inclusive city. The three housing outcomes in the Brighton & Hove City Council plan 2024 to 2027 are:

- Improved housing quality
- Increased housing supply
- Improved housing support

The 5 priorities in Homes for everyone: Housing strategy 2024 to 2029 are as follows:

1. Improve housing quality, safety and sustainability

2. Deliver the homes our city needs
3. Prevent homelessness and meet housing need
4. Support independence and improved health and wellbeing for all
5. Provide resident focused housing services

The final draft homelessness and rough sleeping strategy 2025 to 2030 sets out 3 proposed priorities and 9 areas for focused action.

1. Increase our effectiveness in preventing homelessness and rough sleeping
    a. Early identification of risk and early intervention
    b. Support people to stay in their homes or to find a new home
    c. Deliver targeted prevention for people at risk of rough sleeping

2. Improve temporary accommodation pathways and experiences
    a. Improve move on from temporary accommodation into settled housing
    b. Support people living in temporary accommodation
    c. Improve the supply and quality of temporary accommodation

3. Improve joined-up support with our partners for people who most need help
    a. Target support for people who are most vulnerable
    b. Create integrated services for people with Multiple Compound Needs
    c. Support people experiencing rough sleeping to access services and accommodation

Based on engagement with partners we have also included a dedicated chapter focusing on tackling homelessness in children and young people. This builds on the first 3 priorities as they apply to children, families and young people. The proposed chapter received strong endorsement in the public consultation.

4. Tackling homelessness in children, families and young people

The strategy makes 3 commitments to ways of working which underpin our approach. These are to:

1. Be fair and inclusive
    a. Develop holistic, person-centred and trauma informed services
    b. Champion equality, diversity and inclusion
    c. Challenge stigma and promote community integration and social connections

2. Work in partnership
    a. With people with lived experience to co-produce and co-design services
    b. With government, regional and local partners to tackle the root causes of homelessness
    c. With our voluntary, community and social enterprise sector partners to bring additional resources and expertise to deliver the aims of the strategy

2. Make best use of our resources
    a. Ensure our workforce has the support, knowledge and skills to do their very best
    b. Manage our financial resources and assets to ensure best value and financial sustainability
    c. Use our information to better understand need, deliver evidence-based solutions and drive innovation

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

People at risk of homelessness or currently homeless across all protected characteristics and intersecting groups as set out in the council's Equality Impact Assessment (EIA) Toolkit 2023. Specific disproportionate and intersectional impacts are considered across all protected characteristics and vulnerable groups. Homelessness is identified as a specific factor to be considered within the council's equalities framework.

4. Consultation and engagement

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

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

The development of proposals in the draft homelessness and rough sleeping strategy was informed by other local consultation and engagement exercises that considered housing and related issues. This included the following published documents:

- Homes for everyone - housing strategy 2024 to 2029: consultation report
- Adult Learning Disability Strategy
- Autism Strategy
- Mental Health Housing Action Plan
- Preventing and Tackling Violence Against Women and Girls, Domestic Abuse and Sexual Violence Strategy
- Tackling Anti-social Behaviour Policy
- Community Safety and Crime Reduction Strategy
- Older People's Housing Needs Assessment
- Trans Needs Assessment
- Women's rough sleeping census 2024
- Homeless health needs audit
- Here for You: Youth Led Blueprint Project
- Working Together: Our Vision to End Homelessness
- Women's mental health through homelessness and housing transitions: barriers and sources of support
- LGBTQ+ Housing Manifesto
- Pan-Sussex Domestic Abuse Accommodation Strategy
- Cost of living plan

A call for evidence in December 2024 and subsequent submissions led to the consideration of the following unpublished reports on local needs which have informed the review of homelessness, strategy development and this EIA.

- Galvanise Brighton & Hove 2019
- Audit of drug deaths report 2024
- Switchboard LGBTQ+ audit
- Out of Area Health Worker evaluation
- Women's Emergency Accommodation Action Group Case for Support
- Impact Report 2024 Clocktower Sanctuary
- Switchboard LGBTQ+ Homelessness and Rough Sleeping 01/01/24 to 31/12/24
- Voices in Exile Migrant Homelessness Case Studies
- Safe Haven Sussex CIC Statistics for Homeless & Rough Sleeping Strategy
- Sussex Interpreting Services Homelessness Case Studies
- Safe Haven by the Sea: A Report on Housing Challenges and Solutions for Domestic Abuse Survivors in Brighton and Hove

Finally, public consultation on a draft homelessness and rough sleeping strategy was held from 8 September to 26 October 2025. Findings as they relate to equality impacts are summarised in this EIA. A consultation report accompanies the cover paper for cabinet decision.

5. Current data and impact monitoring

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

(Delete and indicate as applicable from the options Yes, No, Not Applicable)

Age	YES
Disability and inclusive adjustments, coverage under equality act and not	YES
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	YES
Religion, Belief, Spirituality, Faith, or Atheism	YES
Gender Identity and Sex (including non-binary and Intersex people)	YES
Gender Reassignment	YES
Sexual Orientation	YES
Marriage and Civil Partnership	YES
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	YES
Armed Forces Personnel, their families, and Veterans	YES
Expatriates, Migrants, Asylum Seekers, and Refugees	YES
Carers	NO
Looked after children, Care Leavers, Care and fostering experienced people	YES
Domestic and/or sexual abuse and violence survivors, and people in vulnerable situations (all aspects and intersections)	YES
Socio-economic disadvantage	YES
Homelessness and associated risk and vulnerability	YES
Human Rights	NO
Ex-offenders	YES
Lone Parents	YES
People facing literacy and numeracy barriers	NO
People who have experienced human trafficking or modern slavery	YES
People with experience of or living with addiction and/ or a substance use disorder (SUD)	YES
Sex workers	NO

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

- Ex-offenders and people with unrelated convictions
- Lone parents
- People experiencing homelessness

6

Commented [SM2]: Hi @Tom, could you cast your eye over this list in the draft EIA. I've taken direct from the housing strategy but based on our earlier conversations I think some of the answers need amending. Perhaps one for discussion when we meet?

Commented [TM3]: I think this is a "NO" as there aren't support needs specific enough to this, although there is one for "Learning disability" if that is worth commenting on

Commented [TM4]: "YES" as this is recorded as a support need

Commented [TM5]: "NO" as cannot find any data on Home Connections identifying a sex worker.

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

If you answered “NO” to any of the above, how will you gather this data to enable improved monitoring of impact for this activity? What are the arrangements you and your service have for monitoring, and reviewing the impact of this activity?

The final strategy will be accompanied by an annual action plan. Specific projects and programmes will be assessed and monitored for their equality impacts.

While equalities data is collected, this is often incomplete or partial. It is also not done consistently or across all services. There are gaps in data highlighted above. Much of our equality data collection is partial and our systems and processes do not facilitate the collection and analysis of data for all groups with protected characteristics. For example, data is held on temporary accommodation clients on both NEC Housing and Home Connections systems, information such as someone’s ethnic group may be on one system but not the other. There may also be practical reasons why data is not available or is not reliable. For example, data is not collected on pregnancy, maternity or paternity for housing register applications. It would be difficult to keep track of this data over time as most applicants remain on the register for several years.

See recommendation 26

6. Impacts

Advisory Note:

- **Impact:**
  - Assessing disproportionate impact means understanding potential negative impact (that may cause direct or indirect discrimination), and then assessing the relevance (that is: the potential effect of your activity on people with protected characteristics) and proportionality (that is: how strong the effect is).
  - These impacts should be identified in the EIA and then re-visited regularly as you review the EIA every 12 to 18 months as applicable to the duration of your activity.
- **SMART Actions mean**: Actions that are (SMART = Specific, Measurable, Achievable, Realistic, T = Time-bound)
- **Cumulative Assessment:** If there is impact on all groups equally, complete **only** the cumulative assessment section.
- **Data analysis and Insights:**
  - In each protected characteristic or group, in answer to the question 'If "YES", what are the positive and negative disproportionate impacts?', describe what you have learnt from your data analysis about disproportionate impacts, stating relevant insights and data sources.
  - Find and use contextual and wide ranges of data analysis (including community feedback) to describe what the disproportionate positive and negative impacts are on different, and intersecting populations impacted by your activity, especially considering for Health inequalities, review guidance and inter-related impacts, and the impact of various identities.
  - For example: If you are doing road works or closures in a particular street or ward – look at a variety of data and do so from various protected characteristic lenses. Understand and analyse what that means for your project and its impact on different types of people, residents, family types and so on. State your understanding of impact in both effect of impact and strength of that effect on those impacted.
- **Data Sources:**
  - **Consider a wide range (including but not limited to):**
    - Census and local intelligence data
    - Service specific data
    - Community consultations
    - Insights from customer feedback including complaints and survey results
    - Lived experiences and qualitative data
    - Joint Strategic Needs Assessment (JSNA) data
    - Health Inequalities data
    - Good practice research
    - National data and reports relevant to the service
    - Workforce, leaver, and recruitment data, surveys, insights
    - Feedback from internal 'staff as residents' consultations
    - Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
    - Insights, gaps, and data analyses on 'who' the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.
- Learn more about the Equality Act 2010 and about our Public Sector Equality Duty.

5.1 Age

Does your analysis indicate a disproportionate impact relating to any particular age group? For example: those under 16, young adults, with other intersections.	YES

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

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

The council collects detailed equality and other data on the main homelessness applicant but not on other members of their household. This is a significant limitation in our understanding of the needs of all people experiencing homelessness in the city. An exception is the age of household members under 18 but this has only been collected since 1 April 2024.

The table below shows the age group of main applicants owed a housing duty compared with the city population.[1] Between 2020 and 2024, people aged between 25 and 44 were significantly over-represented amongst those owed a prevention, relief or main housing duty compared to the city's population. People over 55 were under-represented.

Age Group	Prevention duty owed (2020 to 2024)	Relief duty owed (2020 to 2024)	Main duty accepted (2020 to 2024)	Brighton & Hove Census 2021
16 to 24	9%	17%	18%	18%
25 to 34	25%	30%	28%	18%
35 to 44	26%	26%	25%	16%
45 to 54	20%	16%	15%	18%
55 to 64	11%	8%	9%	14%
65 plus	7%	3%	5%	17%
Total	100%	100%	100%	100%

When compared with the wider city population, homelessness main applicants are more likely to be aged between 25 and 44 (51% of prevention, 56% of relief, 53% of main and 34% of citywide residents) and less likely to 55 and over (19% of prevention, 12% of relief, 14% of main and 30% of citywide residents). Some possible factors behind this are higher rates of home ownership and lower rates of private renting with increased age, shorter life expectancy of homeless people and the long periods households accepted as owed a main housing duty are likely to wait on the housing register before moving into settled housing.

Children (aged 0-17) are usually part of households where the main applicant is an adult. This means that they are not captured in the time series data on main applicants (with the exception of 16-17 year olds where they are the main applicant). Data on the number of children in temporary accommodation is only available from 1 April 2024, so it is not possible to identify a trend. From the data we do have, children are significantly over-represented amongst those experiencing homelessness in the city.

Shelter estimated that there were 1,411 children in Brighton & Hove experiencing homelessness on 30 June 2024. This figure was 39.4% of the 3,580 people they estimated to be experiencing homelessness on that date. At the Census 2021 children made up 17.1% of the city's population.

[1] For definitions of the main housing duties and other terms please see Review of Homelessness in Brighton & Hove 2025, pp. 13-14.

There is a growing body of national evidence showing the negative impact of childhood homelessness, including poorer health, education and access to services.2 These impacts can last a lifetime and include lower educational attainment, higher rates of unemployment, risk of future homelessness and risk of offending.3

The table below shows the percentage of households with children, with much higher proportions of households with children among those owed a prevention duty (42%) or accepted for the main duty (42%) when compared with citywide households (24%). The proportion among those owed a relief duty (19%) is lower than for citywide households, as households without children (such as single adult households) are comparatively less likely to present at the prevention duty stage or to be accepted for the main housing duty.

Children in household	Prevention duty owed (2020 to 2024)	Relief duty owed (2020 to 2024)	Main duty accepted (2020 to 2024)	Brighton & Hove Census 2021
Yes	42%	19%	42%	24%
No	58%	81%	58%	76%
Total	100%	100%	100%	100%

47% of the households living in temporary accommodation at the end of December 2024 had children. The rate of households with children living in temporary accommodation in Brighton & Hove was 5.73 per 1000 households. This is higher than the national rate of 3.5 per 1000 households.

Research undertaken by the UK Parliament's Housing, Communities and Local Government Select Committee identifies significantly poorer outcomes for children living in temporary accommodation compared with those in settled accommodation.[4] Their report highlights a particular concern about the use of Bed & Breakfast and out-of-area temporary accommodation for families with children. The Local Government Association also identify a wide range of impacts that growing up in temporary accommodation can have on children and young people.[5] These range from disruption of access to universal healthcare like vaccinations; higher rates of infection and accidents; risk of sexually transmitted infections and unwanted pregnancies; higher rates of stress, anxiety, depression and behavioural issues; poorer educational attainment and attendance; bullying and isolation; increased experience of trauma, abuse and other adverse experiences; higher risk of exploitation, trafficking and involvement in gang or criminal activity.

The 2025 review of homelessness conducted to inform strategy development indicates that there is very little specific service provision for children and families living in temporary accommodation in the city.[6] There appears to be variation in how universal and specialist children's services respond to the needs of

[2] All Party Parliamentary Group: Households in Temporary Accommodation, 2025, *Child Mortality in Temporary Accommodation 2025* https://householdsintemporaryaccommodation.co.uk/reports/child-mortality-in-temporary-accommodation-2025/

[3] UK Parliament, House of Commons: Housing, Communities and Local Government Committee, 2025, England's Homeless Children: The crisis in temporary accommodation https://publications.parliament.uk/pa/cm5901/cmselect/cmcomloc/338/report.html#heading-0

[4] UK Parliament, House of Commons: Housing, Communities and Local Government Committee, 2025, *England's Homeless Children: The crisis in temporary accommodation* https://publications.parliament.uk/pa/cm5901/cmselect/cmcomloc/338/report.html#heading-0

[5] Local Government Association, 2017, The Impact of Homelessness on Health: A Guide for Local Authorities https://www.local.gov.uk/sites/default/files/documents/22.7%20HEALTH%20AND%20HOMELESSNESS_v08_WEB_0.PDF

[6] Brighton & Hove City Council, 2025, Review of homelessness in Brighton & Hove 2025

the city's homeless children, with particular concern in the public consultation about children placed in temporary accommodation outside the city and those in interim accommodation.

Recent research carried out by Centrepoint indicates that youth homelessness across the UK is increasing.[7] Family breakdown is often the primary cause, with vulnerable groups like care leavers and LGBTQ+ youth being disproportionately affected. The Centrepoint report identifies gaps in support offered to young people, with many young people not receiving adequate assessment or assistance. It also points out that measuring the extent of hidden homelessness in young people remains a challenge.

National evidence indicates that homeless young people may be under-represented in official statistics.[8] This is an important caveat to the data presented here. The table below shows the number of main applicants to the council aged 16 to 24 at time of application. While the number assessed as owed a prevention or relief duty have remained broadly stable over the last 5 years, the number accepted as owed a main housing duty has more than doubled.

Number of main applicants aged 16 to 24 per year	Prevention duty owed	Relief duty owed	Main duty acceptance
2020	50	231	52
2021	27	175	48
2022	41	174	98
2023	58	172	89
2024	79	203	116

Home Connections (data extracted 13 Jan 2025)

Evidence submitted to our 2025 review of homelessness by organisation supporting young people identified significant intersections with other characteristics which may increase vulnerability and require tailored service responses. For example, of the young people using the Clocktower Sanctuary in 2024, the cost-of-living crisis was the primary driver of their homelessness. 65% of clients were in unsuitable housing (emergency accommodation, rough sleeping, sofa surfing, etc.) 15% were rough sleeping at end of 2023, with numbers continuing to rise into 2024. Young people using the Clock Tower Sanctuary's services often had high level and complex needs:

- 80% have mental health conditions
- 30% are neurodivergent
- 20% are refugees/asylum seekers
- High levels of trauma and social isolation

In their response to the consultation on the draft strategy, Sussex Nightstop pointed to an over-representation of young people of colour amongst young people using their services and, in the past 2 years of young migrants. The University of Sussex Students' Union in their evidence indicated that international students were disproportionately affected by difficulty finding suitable accommodation leading to insecure and unsuitable housing situations.

The 2025 review of homelessness indicates that the city has strong and well-developed service provision for young people aged 18-25. The Here for You report states that only 40% of young people seek help from

[7] Centrepoint, Hidden In Plain Sight: Understanding Youth Homelessness In The UK (2025), https://centrepoint.org.uk/research-reports/databank-2023-2024-hidden-plain-sight-understanding-youth-homelessness-uk

[8] Office for National Statistics, 2023, *"Hidden" homelessness in the UK: evidence review* https://www.ons.gov.uk/peoplepopulationandcommunity/housing/articles/hiddenhomelessnessintheukevidencereview/2023-03-29

their local council.[9] The report found that, while knowledge of youth specific service provision in the city is better than national data would suggest, around 44% of local young people are unaware of services.

Changing needs, particularly in relation to the intersections identified above may require services to adapt their offer. The local evidence indicates that this is a challenge that most services are embracing. During the engagement and public consultation on the strategy, resourcing to meet these needs remains a major issue for all service providers both statutory and non-statutory.

Older adults are significantly under-represented amongst those experiencing homelessness compared to the population of the city. There is a significantly increased risk of early death for older people who have experienced homelessness at any point in their life.[10] There are also challenges for this age group when homeless. Older adults are more likely to have a limiting long-term condition or disability which means that they may need accessible accommodation including accessible temporary accommodation. This is not always available. During the engagement phase of strategy development, health partners identified a rise in the number of clients (85+) who could live independently but who are particularly difficult to find suitable accommodation for due to their frailty. This section should be read in conjunction with section 5.2 on Disability impacts.

During the strategy consultation, the Older People's Council highlighted concerns about the precarious situation of some older people privately renting in the city. National survey research by Crisis indicates that nearly half (47%) of people 55+ on low incomes would have nowhere to go if they lost their home.[11] The research found that in the 2023-24 financial year, 40,320 people aged 55+ were facing homelessness, representing a 32% increase on two years prior.

People living in hostels and shelters: Census 2021[12]

National data from the Census 2021 indicates that the median age of people identified as experiencing homeless and living in hostels or shelters in England and Wales was eight years younger than the median age of the rest of the population of England and Wales (32 years old, compared with 40 years old, respectively). Over half of those living in hostels or temporary accommodation were between the ages of 15 and 34.

The chart below shows that over half of females living in hostels or shelters were aged between 15 and 29 years (54.7% of women identified as homeless). Females identified as homeless had a median age of 25 years old, which was 16 years younger than the median female age of 41 years old in the rest of the England and Wales population. Females identified as homeless had a median age nine years younger than males identified as homeless (25 years old for females, and 34 years old for males).

Males identified as homeless had a wider spread of ages, with 59.3% aged 15 to 39 years. Males identified as homeless had a median age of 34 years old, five years younger than the median male age of 39 years old in the rest of the England and Wales population.

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[9] Clocktower Sanctuary, Sussex Nightstop, YMCA Downslink Group, 2025, Here for You: Youth Led Blueprint Project
[10] P. Demakakos et. Al., 2020, *Lifetime prevalence of homelessness in housed people aged 55–79 years in England: its childhood correlates and association with mortality over 10 years of follow-up*, *Public Health.*
[11] Crisis, 2025, 'I didn't expect to be living the way I am': Older people's experiences of housing precarity and homelessness.
[12] The Office for National Statistics advises caution when using and interpreting this data. There were an estimated 13,955 people at hostels and temporary shelters in Census 2021; this is only a small proportion of all people experiencing homelessness, and therefore much lower than other official estimates for this group. Data was collected during the pandemic and the 'Everyone In' policy which may have skewed the data.



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Recommendations

Proposals set out in the draft strategy are likely to have a positive impact on all age groups but particularly on children, young people and older adults. With a clear rationale based on numbers affected, evidence of negative impact of homelessness on current and future outcomes and positive stakeholder feedback, the focus on children, families and young people is likely to improve outcomes for homeless people aged 0-25. Recommendations are:

1. Retain the focus on children, families and young people as proposed and recognise that:

- **0 to 25 is a broad age range and interventions to deliver the strategy should recognise the distinct needs of different age groups, and particularly those of young people aged 18-25.**
- **Considering children and young people's wellbeing in the context of the broader family reflects the council's 'Think Family' approach, however, family breakdown and domestic abuse are common causes of homelessness and services and interventions need to be aware of the complex issues involved during implementation.**

2. Age is both an independent determinant of risk and vulnerability and also intersects with other characteristics and circumstances which increase risk and vulnerability. Services and interventions to deliver the strategy should recognise and address those intersections with a particular focus on mental health, disability, neurodiversity, sexual orientation, gender identity, migration status and ethnicity.

3. **Ensure that the numbers of older people at risk or experiencing homelessness are monitored and their specific needs are met within the implementation of the strategy. This includes the need for supported and other forms of age-appropriate housing.**

4. **Improve the collection and use of data to enable a clearer picture of demand and need. This includes more 'real-time' data analysis including financial data. We need to address gaps in our understanding and develop systems to collect and analyse relevant data including equalities data on all household members. The assessment of the needs of all people living in temporary accommodation, including children and families and young people, should be a priority.**

5.2 Disability:

Does your analysis indicate a disproportionate impact relating to Disability, considering our anticipatory duty?	YES

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

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

The 2021 census indicates that 19% of households in the city have a member with a long-term health problem or disability. The 2023 Strategic Housing Market Assessment (SHMA) projects that the number of disabled residents is likely to increase substantially between 2022 and 2041 due to a forecast 46% increase in the population aged 65+ (whereas under 65s will remain static or decrease). There are also projected increases in the number of people with dementia and mobility issues which are likely to be concentrated in older age groups. The SHMA also indicates a future increase in demand for housing services for people with autism.

Demographic projections in the SHMA show:

- Significant increases in all areas of need and increasing complexity of need in the younger disabled adult population.
- People aged 18-64 predicted to have impaired mobility is estimated to increase by 9% from 2019 – 2030 in Brighton & Hove. This is significantly higher than the average in other areas where it is estimated to increase by 2%.
- It predicts that there will be 11% more people between 18 and 64 with a moderate disability and a 15% increase in people with a serious disability by 2030. This equates to 580 more people out of a total of 1,047 more people with moderate to serious disabilities with personal care needs.
- 22% of adults in Brighton & Hove have two or more long term health conditions and this is expected to grow by 20% or 10,500 more people by 2030.

Households with a disabled household member are more likely to be in housing need. For example, the 2021 Census showed that 44% of people identified as experiencing homelessness had a limiting long-term physical or mental health condition or illness, compared to 19% of residents citywide.

The table below shows council recorded data on three disability-related additional support needs for main applicants from 8,494 households who made homeless applications to the council in the five calendar years between 2020 and 2024 and were assessed as either threatened with homelessness and owed a prevention duty (2,753), already homeless and owed a relief duty (5,741) or eventually accepted for the main housing duty if homelessness was not prevented or relieved (2,205 out of the 8,494 total households). Most households accepted for the main housing duty will be placed into temporary accommodation while this duty is in effect, with 87% (1,924 of 2,205) recorded as having spent time in temporary accommodation. While not directly comparable with the 2021 Census data, because this uses a different question to those used to gather data on additional support needs, the measure for the proportion of main applicants with at least one of these three support needs recorded indicates a relatively high prevalence of disabilities among those owed a prevention (42%), relief (46%) or main (54%) duty.

Disability-related support needs (overlapping categories) recorded at time of assessment for homeless application	Prevention duty owed (2020 to 2024)	Relief duty owed (2020 to 2024)	Main duty accepted (2020 to 2024)
History of mental health problems	27%	35%	37%
Learning disability	4%	5%	5%
Physical ill health and disability	23%	22%	30%
At least one of the above	42%	46%	54%

Homeless Link, in their 2021 national survey of 2,776 people experiencing homelessness, found that:

- 63% had a long-term illness, disability or infirmity
- 82% had a mental health diagnosis
- 45% reported self-medication with drugs or alcohol to help them cope
- 38% had been admitted to hospital in the past 12 months
- 37% of hospital admissions related to a physical health condition, and 28% related to a mental health condition, self-harm or attempted suicide

Local data from the Health Counts 2024 survey found that those living in temporary and emergency accommodation were less likely to report being in good health than the population of the city overall. They were more likely to report poor mental health and unhealthy lifestyle behaviours. The survey found that 67% of respondents living in temporary accommodation reported poor health or disability, 72% reported anxiety, 48% reported suicidal thoughts, 20% had self-harmed, and 24% had tried to take their own life.

A history of mental health problems is the most common recorded support need of homelessness applicants to the council, affecting 27% of applicants owed a prevention duty, 35% of applicants owed a relief duty and 37% of those owed a main duty.

Data from Arch Healthcare, a GP practice specialising in healthcare for people experiencing homelessness, indicates that of a practice population of around 1,600 patients, some 20% had self-harmed. This is reportedly more common and likely to be under-recorded. 54% of Arch patients were coded as having depression, 44% anxiety and 12% PTSD.

The Sussex Partnership Foundation Trust Mental Health Discharge Improvement Plan for Sussex identified that between February and July 2021 there were 20 patients whose discharge was delayed. The main reasons for the delayed transfer of care in Brighton & Hove was a lack of available space in a residential home (5 persons) or supported accommodation (5 Persons). In March 2022 the embedded Homeless Prevention Officer had a case load of 20 in-patients, all of whom were suitable for supported or general needs accommodation, and all of whom were homeless. Adult Social Care data shows that as of October 2021 there were 175 people placed in Mental Health Care homes by the council. 54% were placed out of area. For most (70%) this was due to a lack of appropriate placement rather than through choice.

The 2023 SHMA concluded that there is a lack of provision of supported living and residential care accommodation for people with mental health support needs. Feedback from professionals as part of the engagement for the Brighton & Hove Mental Health & Housing Plan May 2022 found that 70% of respondents believed their clients would not be able to access accommodation suitable for their mental health needs.

Physical ill health and disability was the second most recorded support need of homelessness applicants to the council, affecting 23% of applicants owed a prevention duty, 22% of applicants owed a relief duty and 30% of those owed a main duty.

Disability is more common in older adults. This intersection is linked to increasing physical frailty. Being frail describes when someone loses their inbuilt reserves and therefore becomes vulnerable to serious adverse outcomes from seemingly minor stressors, such as a change in housing situation or a trip to the emergency department. There is a growing understanding that more people are becoming homeless in later life. Those experiencing homelessness, especially those with multiple compound needs or with a history of rough sleeping, can also experience frailty at a younger age.
In Brighton & Hove, work is being undertaken to improve the identification of frailty in people experiencing homelessness. The Homeless Health and Inclusion team use the Edmonton Frail Scale to identify those who are frail. The main components of frailty in this group relate to malnutrition and mobility issues. If frailty is not identified and if chronological age and other issues like substance use are focused

upon, individuals are vulnerable to their needs not being adequately met, including being placed in less suitable accommodation.

During consultation on the draft strategy our attention was drawn to research indicating high levels of traumatic brain injury amongst people experiencing homelessness.[13] Most of those interviewed by researchers had received their injury before they became homeless.

The Brighton & Hove Learning Disability Strategy estimates that 5,031 adults in the city have a learning disability, of whom 1,259 have a moderate or severe learning disability. This represents around 2.2% of the adult population. Learning disability is a recorded support need of 4% of applicants owed a prevention duty, 5% of applicants owed a relief duty and 5% of those owed a main duty. While the numbers are small, these proportions indicate that people with a learning disability are over-represented in the city's homeless population.

Engagement conducted as part of the strategy development highlighted the need for services which are responsive to the needs of people with a learning disability. People highlighted the increasing need for more individualised accommodation to address compatibility issues and the needs of people with challenging behaviours. There is also limited accommodation to meet the needs of those with physical needs alongside their learning disability. Due to the lack of appropriate accommodation in the city, some individuals are placed out of area away from family and friends.

The SHMA 2023 projects an increase of 2.9% in people 18-64 with autistic spectrum disorders (from 1,429 individuals in 2022 to 1,470 in 2041). Council data shows a rise in the demand for supported accommodation for autistic people.

Consultation with autistic adults to inform the Autism Strategy 2024 identified the following areas of need:

- appropriate and accessible information about housing options and housing support
- inclusive adjustments to enable autistic people to access housing support
- the provision of safe, stable and accessible housing that meets sensory needs across all types of tenure
- if homeless, that support is offered by staff that understand the needs of autistic people
- Emergency and temporary accommodation is not suitable for many autistic people
- Autistic people are at greater risk of conflict with neighbours

The Autism Strategy identifies a significant need for supported living accommodation for autistic people, many of whom also have access needs, a need for accommodation that takes account of sensory needs and physical health conditions. It also identifies a need for suitable provision for autistic adults with significant mental health conditions.

National Housing Benefit policy is based on adults under 35 sharing with others, and this is often not appropriate for autistic people who need their own space. There is also a lack of supported living options for autistic adults to move on from temporary accommodation. These factors mean that autistic people are likely to remain living with their family or guardians for longer. Relationships can often break down, and the individual may need to move out of the local area and away from their support networks or become homeless.

The housing strategy consultation in 2024 identified the following issues relating to service provision for people with autism:

- Ensuring reasonable adjustments are made
- Design standards to ensure suitability of housing including temporary accommodation
- Targeted homelessness prevention and housing support
- Training about autism for staff and contractors

[13] Michael Oddy et. al., undated, The Prevalence of Traumatic Brain Injury in the Homeless Community in a UK City https://brainkind.org/wp-content/uploads/2023/09/dtfoundation-briefing-2pp_web.pdf

The council collects data on a range of support needs of main homelessness applicants. 58% of those owed a prevention duty, 68% of those owed a relief duty and 71% of those accepted for a main duty were assessed as having at least one of the following support needs. The table below details the full list of recorded (overlapping) additional support needs.

All support needs (overlapping categories) recorded at time of assessment for homeless application	Prevention duty owed (2020 to 2024)	Relief duty owed (2020 to 2024)	Main duty accepted (2020 to 2024)
Access to education, employment or training	3%	2%	1%
Alcohol dependency needs	4%	10%	7%
At risk of/has experienced abuse (non-domestic abuse)	2%	4%	4%
At risk of/has experienced domestic abuse	6%	12%	16%
At risk of/has experienced sexual abuse/exploitation	2%	3%	4%
Care leaver aged 18-20 years	0.3%	1%	1%
Care leaver aged 21+ years (retired category)	0.3%	1%	1%
Difficulties budgeting	7%	2%	2%
Drug dependency needs	4%	12%	7%
Former asylum seeker	2%	3%	3%
History of mental health problems	27%	35%	37%
History of repeat homelessness	3%	9%	5%
History of rough sleeping	2%	9%	3%
Learning disability	4%	5%	5%
Offending history	3%	11%	5%
Old age	3%	1%	2%
Physical ill health and disability	23%	22%	30%
Served in HM Forces	0.1%	0.3%	0.1%
Victim of modern slavery	0.3%	0.4%	0.3%
Young parent requiring support to manage independently	1%	1%	2%
Young person aged 16-17 years	0.3%	0.2%	0.2%
Young person aged 18-25 years requiring support	3%	5%	5%
At least one of the above	58%	68%	71%

The intersection of more than one support need, including disability related need, is common. Evidence submitted to the review of homelessness by Changing Futures Sussex indicated that in January-March 2025 there were 704 people in contact with services who were homeless and had 2 or more of the following additional needs - substance misuse, mental health issues, domestic abuse, and contact with the criminal justice system.[14]

The 2025 review of homelessness in Brighton & Hove indicates that while there are statutory and VCSE sector services available in the city for people experiencing homelessness who have long term conditions and disabilities, these are clearly stretched, both by the level of demand and by the increasing complexity of need, often caused by the intersection of multiple support needs. The need for more resources and more tailored service provision was a common theme in the public consultation responses.

[14] Changing Futures Sussex, Brighton & Hove Multiple Needs Audit Reports, https://www.changingfuturessussex.org/learning

During the engagement and consultation process the importance of trauma and trauma-informed service provision was frequently mentioned in relation to homelessness and its intersection with other factors. Trauma and physical and mental health problems have a strong and well-established relationship. Although not everyone who experiences trauma develops problems, the experience of trauma (especially severe, repeated trauma or trauma in childhood) significantly increases the likelihood of mental or physical health problems developing. Trauma can affect memory, emotional regulation, and ability to form relationships. It can shatter assumptions about safety, trust, predictability, and self-worth - fundamental beliefs that underpin mental wellbeing. Trauma can leave the nervous system in a heightened state of alert, leading to ongoing anxiety and physical health problems. People with lived experience of homelessness told us that traumatic events including family breakdown, domestic and other forms of abuse, loss of employment, and other issues, often caused their homelessness. The majority indicated that the experience of homelessness was itself traumatic.

People living in hostels and shelters: Census 2021[15]
Data from the Census 2021 indicated that 44.1% of people living in hostels and shelters were disabled. This was more than double the percentage for the rest of the population of England and Wales (17.5%). Across all age groups, the percentage of people living in hostels and shelters who were disabled was much higher than for the rest of the population. This difference was greatest in those aged 35 to 49 years, where 52.1% of people identified as homeless were disabled, compared with 13.9% in the rest of the population for the England and Wales.

Recommendations

Proposals set out in the draft strategy are likely to have a positive impact on disabled people but only if disabilities are explicitly considered in policy and service development as the strategy is delivered and that they are aligned to the principles of the council's Accessible City Strategy.

Recommendations are that in delivering the strategy:

5. **Ensure that disability as a contributory factor to homelessness is recognised and that prevention strategies explicitly address disabled people with inclusive adjustments for D/deaf, hard of hearing, blind, neurodivergent people (with a focus on a neuro-affirmative approach), those with non-visible disabilities, and with access requirements that may not identify as disabled or meet the legal definition of disability, and have various intersections (Black and disabled, LGBTQ+ and disabled).**

6. **Address the lack of suitable temporary accommodation for disabled people the shortage of move on options for disabled people living in temporary accommodation.**

7. **Recognise the complex intersection of disability with other factors that increase risk and vulnerability and ensure that support services are both disability and trauma informed through the delivery of disability awareness and trauma informed practice training.**

Commented [CB7]: I suggest including somewhere in this section (or wherever else you think appropriate) a commitment to strategic alignment with the principles of our Accessible City Strategy

Commented [CB8]: Helpful to write D/deaf as this is inclusive of people with acquired hearing loss as well as those who identify as culturally Deaf.

- "Deaf" (with a capital D) typically refers to people who identify with Deaf culture and use sign language as their primary means of communication.
- "deaf" (lowercase) generally refers to the audiological condition of hearing loss.

Commented [CB9]: Edit for your consideration Steve - if you feel we can include this it would align with our strategic aims.

Commented [CB10]: What shape will this take e.g. disability awareness training and trauma informed practice training?

[15] The Office for National Statistics advises caution when using and interpreting this data. There were an estimated 13,955 people at hostels and temporary shelters in Census 2021; this is only a small proportion of all people experiencing homelessness, and therefore much lower than other official estimates for this group. Data was collected during the pandemic and the 'Everyone In' policy which may have skewed the data.

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

Does your analysis indicate a disproportionate impact relating to ethnicity?	YES

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

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

Differences in homelessness between ethnic groups may partly reflect differences in age profiles, so some caution is needed when interpreting the data in this section. The Office for National Statistics, however, has found that people from ethnic minority groups are more likely to be under-represented in official figures and more likely to form part of a broader group of 'hidden homeless'.[16]

Black and Racially Minoritised is defined by the council in its Joint Strategic Needs Assessment as all ethnic groups apart from White UK/British. Using this definition 26% of residents at the 2021 Census, or 72,272 people, were Black and Racially Minoritised. Brighton & Hove is becoming a more ethnically diverse city. While the overall number of residents increased by 1% between the 2011 and 2021 Census, the number of Black and Racially Minoritised residents increased by 35% or 18,921 people. More than a quarter (27%, 21,775 households) of multi-person households in the city are multi-ethnic households.

Analysis of national data by Shelter in 2020 indicated that Black, Asian and Minority Ethnic (BAME) households were more than three times as likely to be threatened with homelessness or to become homeless than all other ethnicities (1 in 23 households versus 1 in 83 households).[17] They also point to higher levels of overcrowding when compared to White UK/British households. In the 3 years to March 2019, 2% of White British households were overcrowded, compared with 16% of Black African households and 7% of Black Caribbean households.

Research published in 2022 confirmed that Black and minoritised ethnic communities experience disproportionate levels of homelessness in the UK.[18] Other key findings were that:

- In England the highest risk of homelessness is experienced by people from Black and Mixed ethnic groups.
- Asian people in England are more likely to experience 'hidden homelessness', such as living in over-crowded housing or 'doubling up' with other households.
- A third of Black people who had experienced homelessness reported previous discrimination from a social or private landlord.
- The greater risk of homelessness faced by Black and minoritised ethnic communities can't be fully explained by economic, social, or other factors. Irrespective of employment patterns, poverty levels, housing tenure and local housing market conditions, Black and Mixed ethnicity households still have a higher likelihood of experiencing homelessness.

National evidence points to several systemic issues:

[16] Office for National Statistics, 2023, "Hidden" homelessness in the UK: evidence review https://www.ons.gov.uk/peoplepopulationandcommunity/housing/articles/hiddenhomelessnessintheukevidencereview/2023-03-29

[17] Shelter, 2020, Black people are more than three times as likely to experience homelessness https://england.shelter.org.uk/media/press_release/black_people_are_more_than_three_times_as_likely_to_experience_homelessness

[18] Glen Bramley et. Al., 2022, Homelessness and Black and Minoritised Ethnic Communities in the UK: A Statistical Report on the State of the Nation

- Homelessness systems that, rather than compensating for existing inequalities, reinforce them through poor outcomes and discriminatory treatment
- Immigration status barriers mean that people with no recourse to public funds are shut out of most welfare support, leaving them vulnerable to homelessness
- Multiple sources indicate discrimination from landlords as a significant factor
- Data gaps with a lack of robust data and causal evidence on ethnicity and homelessness

The table below presents the percentage breakdown of ethnic groups where recorded for main applicants of households who made homeless applications to the council (6,395 out of 8,494 had this recorded) in the five calendar years between 2020 and 2024 and were assessed as either threatened with homelessness and owed a prevention duty (2,116 had this recorded out of 2,753), already homeless and owed a relief duty (4,279 has this recorded out of 5,741) or eventually accepted for the main housing duty if homelessness was not prevented or relieved (1,669 had this recorded out of 2,205).

Most households accepted for the main housing duty will be placed into temporary accommodation while this duty is in effect, with 87% (1,924 of 2,205) recorded as having spent time in temporary accommodation. The table below also includes 2021 Census data for citywide residents in Brighton & Hove for comparison.

Ethnic Group	Prevention duty owed (2020 to 2024)	Relief duty owed (2020 to 2024)	Main duty accepted (2020 to 2024)	Brighton & Hove Census 2021
White UK/British	61%	67%	64%	74%
White Other	17%	11%	10%	12%
Black or Black British	5%	7%	8%	2%
Asian or Asian British	6%	5%	6%	5%
Mixed	3%	3%	3%	5%
Another ethnic group	8%	7%	9%	3%

Housing service ethnicity data shows that larger proportions of main applicants owed a prevention, relief or main duty were Black or Racially Minoritised (any ethnic group other than 'White UK/British') compared to citywide residents. This breaks down as 39%, 33% and 36% respectively for these duties respectively and 26% of citywide residents. This indicates that people who are Black or Racially Minoritised in Brighton & Hove are more likely to become homeless than those who are White UK/British. This is especially the case for those recorded as 'Black or Black British) or categorised as part of another ethnic group.

Analysis of households accepted for the main housing duty between the 2020 and 2024 calendar years indicates notable differences in the recorded priority needs, which informed the main duty decision, for Black or Racially Minoritised (BRM) households and White UK/British households. This breakdown for the most common priority needs is presented in the table below. For example, BRM households were more likely to be in priority need because the household included dependent children (39% compared to 29% of White UK/British households) and less likely to be vulnerable because of mental health problems (9% compared to 19%).

Priority need for Black or Racially Minoritsed (BRM) households and White UK/British households accepted for a main housing duty	BRM households owed main duty 2020 to 2024	White UK/British households owed main duty 2020 to 2024
Priority need: household includes dependent children	39%	29%
Priority need: vulnerable as result of physical disability / ill health	16%	19%

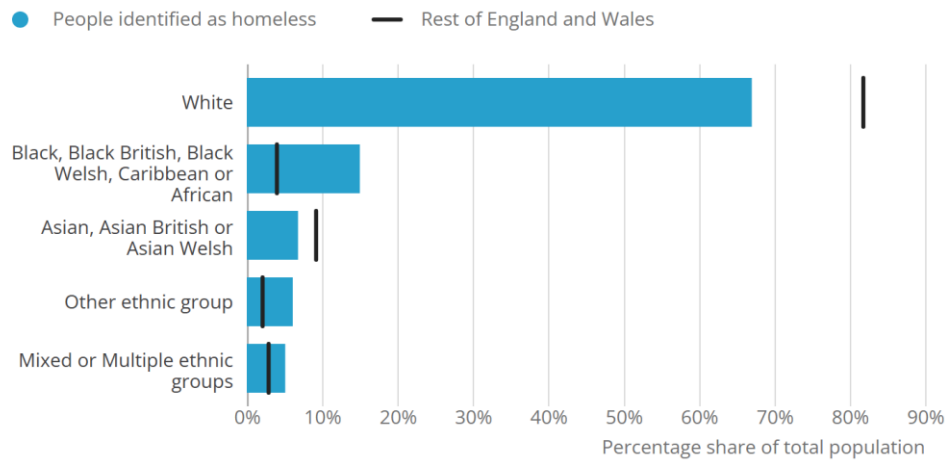
Priority need: vulnerable as result of mental health problems	9%	19%
Priority need: homeless due to having fled domestic abuse	4%	4%
Priority need: former asylum seeker	3%	0%

Analysis of data from the 2021 Census by ethnic group and housing tenure indicates that Black and Racially Minoritised residents across the city were significantly more likely to be in the 'Private rented or lives rent free' category (51.3%) when compared with total citywide residents of all ethnic groups (32.9%). They are therefore more likely to be impacted by the ending of a private rented tenancy as a reason for homelessness than White UK/British residents.

Responses to the public consultation on the draft strategy in 2024 point to a failure in the review of homelessness and the draft strategy to explicitly address the needs of gypsies, Roma and travellers.

People living in hostels and shelters: Census 2021[19]
People identified as living in hostels and shelters were three times more likely to identify as "Black, Black British, Black Welsh, Caribbean or African" than the rest of the England and Wales population.

Percentage of people identified as homeless compared with the rest of the population of England and Wales by high-level ethnic group, England and Wales, Census 2021



Source: Census 2021 from the Office for National Statistics

Recommendations

Commented [CB11]: I suggest including somewhere in this section (or wherever else you think appropriate) a commitment to strategic alignment with the principles of our Anti-Racism Strategy

[19] The Office for National Statistics advises caution when using and interpreting this data. There were an estimated 13,955 people at hostels and temporary shelters in Census 2021; this is only a small proportion of all people experiencing homelessness, and therefore much lower than other official estimates for this group. Data was collected during the pandemic and the 'Everyone In' policy which may have skewed the data.

Ethnicity, 'race' and ethnic heritage as a protected characteristic has many possible intersections including but not limited to religion, migrants, asylum seekers, and refugees. This section should therefore be read in conjunction with sections 5.4 and 5.11 with other intersections considered.

Proposals set out in the draft strategy may have a positive impact in relation to ethnicity, 'race', and ethnic heritage (including Gypsy, Roma, Travellers) if the following recommendations are addressed and are aligned with the principles in the council's Anti-Racism Strategy:

8. **Recognise and address issues leading to higher levels of homelessness in the city's Black and Racially Minoritised population. This includes consistent data collection and monitoring and continuing to embed anti-racist practice, ensuring that policies and services actively seek to identify and address adverse outcomes.**

9. **Ensure that homelessness prevention reflects the increasingly diverse, multi-ethnic nature of the city's population and design interventions that are appropriate to meet the needs of this population.**

10. **Ensure that the needs of the city's Black and Racially Minority homeless population are addressed in the provision of temporary accommodation and move on options for settled accommodation.**

11. **Set out how the needs of Gypsies, Roma and Travellers will be taken forward through a commitment to build on the forthcoming Gypsy, Roma, Traveller accommodation needs assessment with measures built into the strategy delivery plan to be agreed in Q4 2025/26.**

Commented [CB12]: Are you able to clarify how this might be done, Steve? Important given the failure identified in the 2024 consultation.

Could any more specific actions be included here, e.g. targeted GRT engagement, or a needs assessment within a certain timeframe, or identify GRT-specific barriers related to discrimination, site availability etc?

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

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

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

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

Information about faith is not consistently recorded on homelessness applications (2,795 out of 8,494 applicants had this recorded).

The table below presents the percentage breakdown for religion or belief where recorded for main applicants of households who made homeless applications to the council in the five calendar years between 2020 and 2024 and were assessed as either threatened with homelessness and owed a prevention duty (1,195 had this recorded out of 2,753), already homeless and owed a relief duty (1,600 had this recorded out of 5,741) or eventually accepted for the main housing duty if homelessness was not prevented or relieved (828 had this recorded out of 2,205). Most households accepted for the main housing duty will be placed into temporary accommodation while this duty is in effect, with 87% (1,924 of 2,205) recorded as having spent time in temporary accommodation. The table includes 2021 Census data for citywide residents in Brighton & Hove for comparison.

Religion or belief	Prevention duty owed (2020 to 2024)	Relief duty owed (2020 to 2024)	Main duty accepted (2020 to 2024)	Brighton & Hove Census 2021
Buddhist	1%	1%	2%	1%
Christian	27%	22%	21%	31%
Hindu	0%	0%	0%	1%
Jewish	0%	0%	0%	1%
Muslim	8%	12%	12%	3%
No religion	50%	52%	50%	55%
Other	4%	4%	4%	1%
Prefer Not To Say	10%	9%	11%	7%
Sikh	0.3%	0.1%	0.1%	0.1%
Total	100%	100%	100%	100%

The data shows that those main applicants owed a prevention duty were slightly less likely to be Christian (27%) than citywide residents (31%) and even less so for those owed a relief duty (22%) or accepted for a main duty (21%). This is similarly the case for people with no religion, who formed 55% of citywide residents but lower proportions among those owed a prevention (50%), relief (52%) or main duty (50%). The table indicates that Muslims are more likely to become homeless (8% of prevention, 12% of relief and 12% of main duty households) when considered in comparison with their 3% share of citywide residents. This is also the case for people categorised with another religion or belief, who form 4% of prevention, relief and main duty households but 1% of citywide residents.

There is likely to be a significant intersection between ethnicity, race and ethnic heritage and religion. Some religious and cultural practices may require specific housing arrangements, such as single sex accommodation or adherence to food preparation rules. Different cultural traditions within faith groups may also have certain housing preferences or needs. The age, family size, and socioeconomic status of members of a faith group can influence their housing requirements. Faith-based organisations in the city make a significant contribution to addressing housing need, providing practical, spiritual and moral support to those in greatest need, including those who are at risk or who are currently homeless.

Commented [CB13]: Please could you clarify why you think this is happening Steve? Are there barriers to recording/asking that could potentially be addressed through a recommendation?

Commented [SM14R13]: Have added a recommendation to explore why this might be the case. Can also be picked up under rec 26

Commented [TM15]: I have found a way to get this so I suggest I add some analysis of the Ethnicity data from the Housing Data for Homeless and Rough Sleeping Strategy.xlsx which will also need to go in the review document. Discuss with Steve.

Brighton & Hove City Council signed a Faith Covenant with the city's faith leaders in 2018. The Faith Covenant is a joint commitment between faith communities and local authorities to a set of principles that guide engagement, aiming to remove some of the mistrust that exists and to promote open, constructive and collaborative partnership working.

Recommendations

There are many intersections between faith, culture and protected and other characteristics, including but not limited to, ethnicity, 'race' and ethnic heritage, migration, asylum seekers and refugees, and human rights. This section should therefore be read in conjunction with others.

Proposals set out in the draft strategy may have a positive impact in relation to religion, belief, spirituality, faith, or atheism if they are considered in relation to recommendations in other sections, including but not exclusively 5.3 and 5.11.

12. Identify what might cause low response rates for the question on religion or belief and adapt practice accordingly.

5.5 Gender Identity and Sex:

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

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

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

The profile of Brighton & Hove mirrors that of England for Sex in the 2021 Census. The figure in brackets is for England. Female 51.1% (51.0%) Male 48.9% (49.0%). Both the council's housing data recording system and the Census ask, 'What is your sex?'. The target concept of the Census 2021 question is sex as recorded on legal/official documents.

Gender identity refers to a person's sense of their own gender, whether male, female or another category such as non-binary. This may or may not be the same as their sex registered at birth. The question on gender identity was new for Census 2021. The question was voluntary and was only asked of people aged 16 years and over. People were asked "Is the gender you identify with the same as your sex registered at birth?", and they had the option of selecting either "Yes" or "No" and writing in their gender identity. This question is also asked of homelessness applicants to the council.

In Brighton & Hove 92.79% of those asked about gender identity in the Census 2021 answered that their gender identity was the same as their sex registered at birth. The England average was 93.47%. In Brighton & Hove, 0.2% of those asked this question said that their gender identity was different from that registered at birth (2,341 people). Of these 476 gave no specific identity, 329 gave trans woman, 362 gave trans man, 835 gave non-binary, 339 gave another gender identity.

The table below shows the percentage breakdown of sex, where recorded, for main applicants who made homeless applications to the council (8,394 out of 8,494 had this recorded) in the five calendar years between 2020 and 2024. It includes those who were assessed as either threatened with homelessness and owed a prevention duty (2,737 had this recorded out of 2,753), already homeless and owed a relief duty (5,657 had this recorded of 5,741) or eventually accepted for the main housing duty if homelessness was not prevented or relieved (2,194 had this recorded out of 2,205). Most households accepted for the main housing duty will be placed into temporary accommodation while this duty is in effect, with 87% (1,924 of 2,205) recorded as having spent time in temporary accommodation. Census 2021 data for Brighton & Hove is included for comparison.

Sex	Prevention duty owed (2020 to 2024)	Relief duty owed (2020 to 2024)	Main duty accepted (2020 to 2024)	Brighton & Hove Census 2021
Female	60%	37%	55%	51%
Male	39%	62%	44%	49%
Other	1%	1%	1%	-

The data shows that main applicants for households owed a prevention duty or main duty were more likely to be recorded as female (60% of prevention and 55% of main) compared to citywide residents (51%). However, when it comes to main applicants owed a relief duty, the majority are recorded as male (62%) which is significantly higher than for the city population (49%). This indicates that men are more likely than women to present to the council once they are already homeless, rather than when threatened with homelessness.

Women are more likely to be accepted for the main housing duty. A factor which is likely to explain this is the presence of children in a household, which gives a household priority need under the main housing duty. Women are also more likely to be victims of domestic abuse and have priority status for the main

Commented [CB16]: I'd clarify that the intention is to record sex assigned at birth, which aligns with the Supreme Court's definition of sex as biological.

It might be helpful to explain why both are collected and analysed.

This info might be useful: Our work on data about sex and gender identity – Office for Statistics Regulation

Commented [SM17R16]: Hi @Chris - this is taken directly from the Census question descriptor. I've tweaked text and added a link so this is clear.

Commented [SM18R16]: Whether or not that is what it captures in practice is moot.

Commented [TM19]: This percentage presumably includes those who didn't answer in the denominator

housing duty. This section should be read in conjunction with section 5.15 Domestic and/or Sexual Abuse and Violence Survivors, people in vulnerable situations.

The table below gives a breakdown of the duties owed to households with or without children and whether the main applicant was female or male. When it comes to households accepted under the main duty, 62% of those with a female main applicant had children in the household whereas 19% of those with a male main applicant had children in the household. Similar patterns can also be seen for the prevention and relief duties.

Children in households with female or male main applicants (2020 to 2024)	Female main applicant owed prevention duty	Male main applicant owed prevention duty	Female main applicant owed relief duty	Male main applicant owed relief duty	Female main applicant owed main duty	Male main applicant owed main duty
Yes	59%	21%	42%	8%	62%	19%
No	41%	79%	58%	92%	38%	81%
Total	100%	100%	100%	100%	100%	100%

Data on rough sleeping in the city indicates that men are significantly over-represented among those experiencing rough sleeping.[20] The annual snapshot captures data on sex which is not available in the monthly rough sleeping data. Of the 76 people sleeping rough on 1 night in November 2024, most were men, with 69 (90.8%) recorded as male and 5 (6.6%) were recorded as female (sex was not captured for 2 people).

Men are also over-represented amongst those identified in local data as homeless and having Multiple Compound Needs.[21] Of the 704 individuals (homeless with 2 or more other compound needs) in contact with services between January and March 2025, 470 (67%) were recorded as male and 189 (27%) as female.

The table below gives the percentage breakdown of gender identity for main applicants owed a prevention, relief or main housing duty.

Gender identity	Prevention duty owed (2020 to 2024)	Relief duty owed (2020 to 2024)	Main duty accepted (2020 to 2024)	Brighton & Hove Census 2021
No (gender identity different from sex registered at birth)	1.1%	1.5%	1.8%	0.2%
Yes (gender identity same as sex registered at birth or not recorded)	98.9%	98.5%	98.2%	99.8%

Of those who answered 'No', 29 were owed a prevention duty, 84 a relief duty (and therefore were already homeless) and 40 were owed a prevention duty. Although the numbers are small, the data gives some indication that people whose gender identity is different from sex registered at birth are more likely to be at risk of homelessness or to become homeless.

More detailed information about gender identity can be found through cross-referencing the Housing service data about gender and gender reassignment: there were 114 homeless main applicants for any duty (1.3% of the total 8,494) whose gender identity was recorded as different from their sex registered at birth, and these identities are recorded as 41 female (trans woman) and 37 male (trans man) with 18 as part of the 'other' category and 16 who preferred not to say. There is not a specific category for non-binary, so any non-binary homeless main applicants are likely to be recorded within the 'other' category.

[20] Although see the point below on the likely under-representation of women in official figures.
[21] Changing Futures Sussex, 2025, Multiple Needs Audit – Brighton & Hove: January – March 2025

Women are likely to be under-represented in official statistics on homelessness.[22] This is especially the case for single women without children and in relation to various forms of 'hidden homelessness'. Evidence submitted during the review of homelessness mirrors national research findings. These indicate that women experiencing homelessness are more likely to occupy precarious forms of accommodation, including, sofa surfing, spending the night with an unwanted sexual partner to obtain a roof over their head, women engaged in sex work sleeping in parlours or hotel rooms.

The national women's rough sleeping census uses a broader definition of 'nowhere safe to stay' than the official rough sleeping definition.[23] Local and national findings submitted as evidence for the review of homelessness indicate that women are significantly underrepresented in the official snapshot figures. Findings indicate that rough sleeping is rarely a standalone experience for women. Most oscillate between rough sleeping and other forms of homelessness, meaning that traditional approaches to addressing rough sleeping and statutory homelessness may be ineffective for women without children in their care. A lack of visibility means that women are less able to access services and accommodation, and that current policies, strategies and funding models do not recognise or address the true scale and nature of women's rough sleeping.

Previous consultation responses on the draft housing strategy 2024 to 2029 identified the following issues in relation to sex and gender identity:

- Women are disproportionately impacted by homelessness and there is a need to fund services supporting women at risk of becoming homeless and homeless women.
- Need to address specific needs of homeless and insecurely housed women who are experiencing, at risk of or traumatised by abuse, trafficking, modern slavery and being prostituted.
- Need for single sex and additional specialist women's refuge provision.
- Women are more likely to experience violence and abuse both before becoming homeless and whilst homeless.
- There may be a conflict of rights in relation to inclusion and different protected characteristics. Need for balance and proportionality and use of exceptions in relation to the Equality Act.

People living in hostels and shelters: Census 2021[24]
Of all people identified in the Census 2021 as living in hostels and shelters, around two-thirds were male, and one-third were female (67.1% males compared with 32.9% females).[25] The percentage of males identified as homeless was higher than the rest of the population of England and Wales, but lower than females (49.0% males compared with 51.0% females).

Recommendations

This characteristic has several intersections in relation to homelessness including, but not limited to age, gender reassignment, sexual orientation, marriage and civil partnership, pregnancy and maternity/paternity, domestic and/or sexual abuse. This section should be read in conjunction with these other sections.

Proposals set out in the draft strategy may have a positive impact in relation to sex and gender identity if they are considered in relation to recommendations in other sections. Specific recommendations are:

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[22] Office for National Statistics, 2023, "Hidden" homelessness in the UK: evidence review https://www.ons.gov.uk/peoplepopulationandcommunity/housing/articles/hiddenhomelessnessintheukevidencereview/2023-03-29

[23] Solace, 2024, How do we sleep at night? Women's rough sleeping census 2024 https://www.solacewomensaid.org/womens-rough-sleeping-census/

[24] The Office for National Statistics advises caution when using and interpreting this data. There were an estimated 13,955 people at hostels and temporary shelters in Census 2021; this is only a small proportion of all people experiencing homelessness, and therefore much lower than other official estimates for this group. Data was collected during the pandemic and the 'Everyone In' policy which may have skewed the data.

[25] Office for National Statistics, 2023, People experiencing homelessness, England and Wales: Census 2021

13. **Given that men are more likely to present as homeless rather than at risk of homelessness, ensure that prevention initiatives target men explicitly.**

14. **Ensure that temporary accommodation and homelessness services meet the needs of women, especially in relation to intersections with other characteristics including but not exclusively pregnancy and maternity, gender reassignment, sexual orientation, domestic abuse etc. This includes ensuring that there are specific services designed for women and appropriate safe spaces.**

5.6 Gender Reassignment:

Does your analysis indicate a disproportionate impact relating to Gender Reassignment?	YES

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

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

To undergo gender reassignment usually means to undergo some sort of medical intervention, but it can also mean changing names, pronouns, dressing differently and living in one's self-identified gender.

Gender reassignment is a characteristic that is protected by the Equality Act 2010, and it is further interpreted in the Equality Act 2010 approved code of practice. It is a term of much contention and is one that Stonewall's Trans Advisory Group feels should be reviewed.

The data from the Census 2021 and service data in section 5.5 above give some indication of the numbers of people in the city and those using homelessness services who have this protected characteristic.

The Trans Needs Assessment undertaken by the council in 2015 identified the following issues in relation to housing:

- Trans people have a higher risk of homelessness.
- There are significant gaps in knowledge amongst trans people and support organisations around their rights and eligibility for housing services.
- Some trans people report poor experience of some homeless services, including safety concerns
- Training needs are indicated for housing staff.
- A high proportion of trans people live in the private rented sector and many report poor experiences with letting agents.
- Need to improve data collection in relation to gender reassignment and gender identity.

Consultation identified the following issues:

- Hate crime against trans people and the need for a zero-tolerance policy in social and supported housing.
- Safety issues, particularly in emergency / interim and other temporary accommodation.
- Fear of discrimination when approaching services for support.
- A clearer pathway for trans survivors of domestic abuse and sexual violence.
- The need for trans friendly accommodation and service provision in the city.

This protected characteristic has several intersections including, but not limited to, sex and gender identity, sexual orientation, marriage and civil partnership, pregnancy and domestic and/or sexual abuse. This section should be read in conjunction with these.

Recommendations

Proposals set out in the draft strategy may have a positive impact in relation to gender reassignment if they are considered in relation to recommendations in other sections.

15. **Ensure that the specific needs of trans people are addressed in the implementation of the strategy with a focus on ensuring that prevention, temporary accommodation and homelessness services are trans inclusive, with specific measures to address safety concerns.**

Commented [CB20]: Could this section more strongly address safety issues in light of the concerns raised here?

For example, could there be a specific analysis of temp accommodation safety concerns?

Or a safety audit of temp accommodation from TNBI perspective within 12 months?

Or clear placement protocols respecting gender identity and safety?

Can we ensure that single-occupancy options are available?

5.7 Sexual Orientation:

Does your analysis indicate a disproportionate impact relating to Sexual Orientation?	YES

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

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

The question on sexual orientation was new for Census 2021, with a national response rate of 92.5% of all aged 16 years and above. In Brighton & Hove, 10.7% of those responding identified as lesbian, gay, bisexual or other sexual orientation. This is the highest rate for any local authority and significantly above the rate for England and Wales (3.7%).

A similar question is asked of homelessness applicants by Brighton & Hove City Council. The table below presents the percentage breakdown of sexual orientation where recorded for main applicants of households who made homeless applications to the council (8,461 out of 8,494 had this recorded) in the five calendar years between 2020 and 2024 and were assessed as either threatened with homelessness and owed a prevention duty (2,748 had this recorded out of 2,753), already homeless and owed a relief duty (5,713 had this recorded out of 5,741) or eventually accepted for the main housing duty if homelessness was not prevented or relieved (2,200 had this recorded out of 2,205). Most households accepted for the main housing duty will be placed into temporary accommodation while this duty is in effect, with 87% (1,924 of 2,205) recorded as having spent time in temporary accommodation. The table below includes 2021 Census data for Brighton & Hove for comparison.

A relatively high proportion of households are recorded as 'prefer not to say' among homeless applicants (ranging from 30% of prevention duties to 39% of relief duties) compared to the proportion who responded this way in Census 2021 (9%). For this reason the table has been adjusted to calculate the percentages without this category, to allow for more meaningful comparison.

Sexual Orientation (excluding prefer not to say)	Prevention duty owed (2020 to 2024)	Relief duty owed (2020 to 2024)	Main duty accepted (2020 to 2024)	Brighton & Hove Census 2021
Bisexual	1%	1%	1%	4%
Gay / Lesbian	4%	6%	5%	6%
Heterosexual / Straight	91%	88%	89%	89%
Other sexual orientation	4%	5%	5%	1%
Total	100%	100%	100%	100%

Further work is needed to identify why there is such a high proportion of 'prefer not to say' responses but reasons could include lack of trust, fear of discrimination or the way the question is framed.

Council data shows that homeless applicants owed a prevention duty are slightly less likely to be recorded as gay or lesbian (4%) than citywide residents (6%) but those owed a relief duty (6%) are as likely. Homelessness applicants are less likely to be recorded as bisexual (1% across the three duties compared to 4% of citywide residents) and more likely to be recorded as having another sexual orientation (4% of prevention and 5% of relief and main duties compared to 1% of citywide residents).

When combining sexual orientation other than heterosexual / straight, the proportion of applicants owed a prevention duty (9%) is slightly lower than for citywide residents (11%) but those owed a relief or main duty are about the same or close (12% and 11% respectively).

National research on lesbian, gay, bisexual and transgender people's experiences of homelessness, commissioned by the Government Equalities Office, was published in 2024.[26] This aimed to synthesise

[26] Government Equalities Office, 2024, Lesbian, gay, bisexual and transgender people's experiences of homelessness

Commented [CB21]: Consider including adding some text explaining why 'prefer not to say' responses are so high.

Could be due to lack of trust, fear of discrimination, or the way questions have been asked.

Would a potential action be to review of when/how equalities questions are asked?

evidence, including from people with lived experience, to improve understanding of the experiences, attitudes and needs of homeless LGBT people, and how housing and support services are being delivered to LGBT people and how they can be improved to better meet their needs. Key findings were:

- There is no robust data measuring the number of LGBT people currently homeless in the UK. However, existing evidence indicates that LGBT people may be at greater risk of becoming homeless than people not identifying as LGBT.
- Published evidence suggest that some of the homelessness experiences of LGBT people are distinct and closely related to their sexual orientation or gender identity.
- Currently, the housing needs of LGBT homeless people are not being met fully by housing and support services.
- Mainstream temporary accommodation can be a hostile space for LGBT homeless people.
- LGBT homeless people sometimes rely on informal, hidden, and sometimes unsafe temporary housing
- 'Place' matters to LGBT homeless people, who have reasons for migrating to certain areas

Data from Switchboard identified 104 individuals who approached them in 2024 with concerns relating to homelessness and rough sleeping. This included 18 trans, non-binary and intersex people and 12 LGBTQ migrants, refugees and asylum seekers. Of all those seeking help, 80% received support relating to suicide prevention.

Some of the issues raised in public consultation in relation to sexual orientation included:

- Family breakdown and rejection as a driver of homelessness, especially in young LGBTQ+ people
- Low priority given to LGBTQ+ housing needs, safety and health/wellbeing
- Additional vulnerabilities including mental health conditions
- Impact of hate crime and the need for a zero-tolerance approach
- Barriers to housing including discrimination by private landlords and unsuitable housing
- Need for LGBTQ+ training for commissioners and homelessness services staff
- Better engagement and consultation with LGBTQ+ communities
- Safety concerns in emergency/interim and temporary accommodation
- Need for housing information and support and clearer pathways for LGBTQ+ people
- Better understanding and consideration of impact of intersectionalities with other protected characteristics e.g. age, disability or ethnicity
- Improved data collection and monitoring
- Need for LBGTQ+ specific accommodation
- Need for inclusive quality standards for homelessness service providers

People living in hostels and shelters: Census 2021[27]
Of all people identified in the Census 2021 as living in hostels and shelters, more than double identified as lesbian, gay, bisexual, or "other" (LGB+) (7.7%) than in the rest of the population of England and Wales (3.2%). More people identified as homeless chose not to answer the question (13.7%) compared with the rest of the population of England and Wales (7.5%). This reinforces evidence from other sources that sexual orientation is a factor in homelessness.[28]

Recommendations

[27] The Office for National Statistics advises caution when using and interpreting this data. There were an estimated 13,955 people at hostels and temporary shelters in Census 2021; this is only a small proportion of all people experiencing homelessness, and therefore much lower than other official estimates for this group. Data was collected during the pandemic and the 'Everyone In' policy which may have skewed the data.

[28] Brodie Fraser, et. Al, 2019, LGBTIQ+ Homelessness: A Review of the Literature

This protected characteristic has many intersections. This section should therefore be read in conjunction with other parts of this EIA.

Proposals set out in the draft strategy may have a positive impact in relation to sexual orientation if the implementation plan takes into account the following recommendations:

16. **Improve inclusive assessment of need, ensuring that all homelessness services, including commissioned services, routinely collect and monitor sexual orientation and gender identity data at all stages of engagement including addressing low response rates. Ensure that assessments of need identify whether homophobic, biphobic, or transphobic abuse has contributed to homelessness. (See also recommendation 26.)**

17. **Deliver comprehensive LGBT inclusion training for all frontline staff and commissioners, covering recognition of LGBT-specific homelessness triggers, suicide prevention, appropriate language and conduct, and inclusive policies**

18. **The draft strategy proposes to strengthen early intervention and family mediation. This should include targeted work with families at risk of breakdown due to LGBT identity issues, including working with mediation services with LGBT expertise. Create early intervention pathways through schools, youth services, and community organisations to identify young people at risk before crisis point.**

19. **Review relevant policies to ensure that LGBT people fleeing homophobic/biphobic/transphobic abuse can access support including temporary accommodation if appropriate.**

Commented [CB22]: Could we also support suicide prevention training for services given the high rate of suicidality identified here by Switchboard?

5.8 Marriage and Civil Partnership:

Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?	YES

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

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

Analysis of the Census 2021 indicates that 82.8% of people living in hostels or shelters in England and Wales had never been married or registered in a civil partnership, compared to 37.9% of the general population.[29] At the point the census was taken 5.4% of people experiencing homelessness were married or in a civil partnership, compared to 44.4% of the adult population. Being married or in a civil partnership appears to be a protective factor against homelessness - married people appear to be underrepresented in some homeless populations.[30]

Research indicates that relationship breakdown is a major and increasing cause of rough sleeping with 17.2% of new rough sleepers in London in 2024/25 citing this as the reason they lost their last settled base.[31]

[29] Office for National Statistics, 2023, People experiencing homelessness, England and Wales: Census 2021

[30] The Office for National Statistics advises caution when using and interpreting this data. There were an estimated 13,955 people at hostels and temporary shelters in Census 2021; this is only a small proportion of all people experiencing homelessness, and therefore much lower than other official estimates for this group. Data was collected during the pandemic and the 'Everyone In' policy which may have skewed the data.

[31] Greater London Authority, 2025, CHAIN Annual Report

Recommendations
This protected characteristic has many intersections, including but not exclusively sex and gender identity and domestic abuse. This section should therefore be read in conjunction with other parts of this EIA.

Proposals set out in the draft strategy may have a positive impact in relation to marriage and civil partnership.

20. In implementing the strategy recognise the relevance of relationships and relationship breakdown for homelessness prevention, temporary accommodation and support services.

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

Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)?	YES

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

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

The Census does not collect data on this protected characteristic and while this is not routinely collected for homeless main applicants owed the prevention or relief duty, it is for those who are accepted for the main duty. Of the 2,205 households who were accepted for the main duty between the 2020 and 2024 calendar years combined, 1.5% were recorded as in priority need because the applicant was or the household included a pregnant woman.

During informal engagement during the development of the strategy our attention was drawn to the lack of local temporary accommodation for young pregnant people This results in placements out of area with loss of family and other support networks.

Recommendations
This protected characteristic has many intersections, including but not exclusively age, and sex and gender identity. This section should therefore be read in conjunction with other parts of this EIA.

Proposals set out in the draft strategy may have a positive impact in relation to this characteristic.

21. In delivering the strategy, ensure that there is assessment and appropriate provision for the needs of pregnant people and parents with young children in temporary accommodation and support services.

5.10 Armed Forces Personnel, their families, and Veterans:

Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?	YES

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

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

The 2021 Census estimates that there are 5,618 people in Brighton and Hove who have previously served in the armed forces. This is around 2.4% of the population.

Housing service data on support needs for applicants between the 2020 and 2024 calendar years combined indicates that those recorded as having served in the armed forces were 0.1% of those owed a prevention duty, 0.3% of those owed a relief duty and 0.1% of those accepted for the main housing duty if homelessness was not prevented or relieved. The total number of applicants was 21, of which 3 initially owed a prevention duty and 18 a relief duty (with 3 of those who were owed a relief duty going on to be accepted for the main housing duty).

There are no military establishments in Brighton and Hove and only around 10 MOD employees stationed in the city. The 2023 Strategic Housing Market Assessment cites anecdotal evidence that the city attracts LGBTQ+ service leavers. It argues that the most acute and pressing housing issue is likely to be finding accommodation for those leaving the armed forces.

A review of the literature on homelessness amongst veterans conducted by the Royal British Legion indicates falling numbers of former service personnel in the homeless population, however the percentage of homeless veterans is still higher than for the general population.[32] Homeless veterans have been found on average to be older, be sleeping rough and have slept rough for longer, be less likely to use drugs and more likely to have alcohol-related problems. Post Traumatic Stress Disorder (PTSD) has been found among a small number of homeless veterans although other non-military related mental health problems were more common.

Survey research found that veterans who felt unprepared for life after service were significantly more likely to be homeless compared to those who felt prepared (0.5% versus 0.1%).[33] Veterans who said they had money worries or disagreed that they belonged to their local community were also more likely to experience homelessness.

During the consultation on the strategy issues raised relating to this protected characteristic included:

- Need for dedicated transitional and permanent supportive housing for veterans
- Increased priority on council housing waiting lists for former service members
- Housing assistance and homelessness prevention services specifically for veterans
- Coordinated support between veteran service organizations, NHS services, and housing providers
- Community integration programs to prevent isolation and community connections

Brighton & Hove City Council signed the Armed Forces Community Covenant in 2013 with the aims of encouraging local communities to support the armed forces community: nurturing public understanding and awareness among the public of issues affecting the armed forces community; and, ensuring that men, women and their families are not disadvantaged through serving or having served in the armed forces.

Recommendations
This protected characteristic has several intersections. This section should therefore be read in conjunction with other parts of this EIA.

Proposals set out in the draft strategy may have a positive impact in relation to this characteristic.

22. In delivering the strategy, ensure that there is appropriate provision for the needs of veterans.

Commented [TM23]: I think either the word "the" needs removing here or another word is supposed to be added at the end such as "area" or "local authority boundaries" or something like that?

Commented [TM24]: I checked if this is apparent in the homelessness data but it is not: most of the 21 applicants recorded as 'served in HM forces' have 'Prefer not to say' as their Sexual Orientation with none recorded as gay, lesbian, bisexual or other. This is of course likely to be a very small and unrepresentative sample of former services personnel across the city.

Commented [CB25]: In case helpful - we now have a Gold award in relation to the covenant: Celebrating a new milestone in our support of our Armed Forces community

[32] Royal British Legion, Literature review: UK veterans and homelessness
[33] Office for Veterans Affairs, 2022, Finance and housing, UK armed forces veterans: Veterans' Survey 2022, UK

5.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

Does your analysis indicate a disproportionate impact relating to Expatriates, Migrants, Asylum seekers, Refugees, those New to the UK, and UK visa or assigned legal status? (Especially considering for age, ethnicity, language, and various intersections)	YES

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

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

The Census 2021 indicates that 54,342 residents of Brighton & Hove were born outside the United Kingdom. This is 19.6% of the usual resident population of the city. Of these, most (28,524) had lived in the UK for 10 years or more. 7,926 had lived in the UK for less than 2 years.

Analysis of housing service data on the nationality of homeless main applicants between the 2020 and 2024 calendar years combined indicates that a sizeable minority were recorded as nationals of a country other than the UK, who were 19% (529 of 2,754) of those owed a prevention duty, 16% (945 of 5,741) of those owed a relief duty and 17% (383 of 2,205) of those accepted for the main housing duty. Furthermore, the service data on support needs for homeless main applicants over the same period indicates that those recorded as former asylum seekers were 2% (58 of 2,754) of those owed a prevention duty, 3% (163 of 5,741) of those owed a relief duty and 3% (72 of 2,205) of those who went on to being accepted for the main housing duty.

National research indicates that migrant homelessness and destitution is increasing, with sharp rises in the number of people seeking support directly after leaving Home Office accommodation and in the number of new refugees rough sleeping.[34]

The Centre for Homelessness Impact identify a number of issues affecting people being resettled in the UK.[35] These include:

- A correlation between the UK's asylum system and a major increase in people sleeping rough after leaving asylum housing.
- Large-scale resettlement programmes, including the Homes for Ukraine schemes, leave people with an increased risk of homelessness due to a lack of support when people leave host households.
- Short move-on periods after asylum application decisions, welfare reforms, the right-to-rent policy, and family reunifications significantly contribute to housing instability for refugees.
- Housing challenges are intricately connected to broader societal issues such as education, health, and employment and refugees face heightened disadvantages in these key areas, impacting their ability to secure and stay in stable homes.

Housing for asylum seekers is the responsibility of the Home Office. Once granted leave to remain, people are expected to find their own accommodation within 28 days. As a rule, refugees fall into a class of persons subject to immigration control who are eligible for housing assistance. Individuals leaving Home Office accommodation may not have sufficient funds to secure private rented housing without additional help. Because asylum seekers are not permitted to work, saving for a deposit may act as a barrier to access the private rented sector. They are also unlikely to have someone who can act as a guarantor. Processing benefit applications can take longer than 28 days. Furthermore, it can take time to receive a National Insurance number, delaying entry to the workforce. These factors mean that refugees can be at increased risk of homelessness.

[34] NACCOM, 2024, Understanding destitution and homelessness in the asylum and immigration system 2023 / 2024
[35] Phillip Brown et. al., 2024, Homelessness, refugees and resettlement

Those whose asylum claim has been refused have no recourse to public funds, no legal right to work, no right to rent in England and extremely limited support options, primarily through voluntary organisations. Others with no recourse to public funds are excluded from benefits and local authority assistance. Adults with care and support needs may receive financial and accommodation assistance from a local authority under the Care Act 2014.

Under the Children Act 1989, local authorities are responsible for asylum applicants below the age of 18 who arrive in the UK unaccompanied and do not have adult close family members already in the UK whom they could join. Support may involve the provision of food, accommodation, foster carers, leisure, language assistance and trauma counselling.

The consultation on the strategy identified specific vulnerabilities for migrants, asylum seekers and refugees (with some also affecting expatriates) including

- risk of trafficking and modern-day slavery
- pre-migration trauma with higher rates of physical and mental health problems, including higher rates of untreated illness
- post-migration stressors including poverty, financial insecurity, unemployment, poor housing conditions, social isolation, loneliness, racism, stigma, and discrimination
- lack of trust in authorities
- increasing hostility to migrants and a 'climate of fear'
- women and LGBTQ+ people may be more vulnerable to domestic and other forms of abuse if they are destitute
- disruption of family life and family support with children and parents sometimes separated

The council is a member of the local City of Sanctuary group, Sanctuary on Sea, with a commitment to build a culture of hospitality and welcome, especially for refugees seeking sanctuary from war and persecution.

Recommendations
As well as other intersections, particular consideration should also be given to sections 5.3 Ethnicity, 'Race', ethnic heritage, 5.15 domestic and/or sexual abuse, violence survivors and people in vulnerable situations and 5.17 human rights and this section should be read in conjunction with these.

Proposals set out in the draft strategy may have a positive impact in relation to this characteristic with the draft strategy explicitly recognising the needs of refugees and asylum seekers.

23. In implementing the strategy, recognise and tackle the multiple and intersecting vulnerabilities affecting refugees and asylum seekers.

5.12 Carers:

Does your analysis indicate a disproportionate impact relating to Carers (Especially considering for age, ethnicity, language, and various intersections).	YES

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

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

Data from the Census 2021 indicates that 20,804 people in the city provide unpaid care for someone who has long-term physical or mental ill-health conditions, illness or problems related to old age.

Carers can include people who have care needs themselves or be young carers looking after a parent or other family member. Financial vulnerability increases risk of homelessness in this group. Around 28% of carers in the UK live in relative poverty after housing costs, with 1.2 million unpaid carers living in poverty.[36] Only 51% of informal carers aged 16+ are in employment compared with 60% of the general population aged 16+.

Data on this protected characteristic is not recorded in the data held on homelessness applications and assessments in a structured way that can readily be analysed. For those assessed as owed a main housing duty, priority need of the main applicant or member of the household, can include a number of factors which indicate that one or more members of that household may have caring responsibility. These are set out in the table below.

This protected characteristic has intersections with age, sex, ethnicity, disability and others and should be read in conjunction with those sections.

Proposals set out in the draft strategy may have a positive impact in relation to this characteristic with the proposed measures to support people to stay in their homes or find new accommodation.

Detailed priority need (2020 to 2024 combined)	No. of households owed main duty	% of households owed main duty
Priority need: household includes dependent children	697	32%
Priority need: vulnerable as result of physical disability / ill health	395	18%
Priority need: vulnerable as result of mental health problems	345	16%
Priority need: homeless due to having fled domestic abuse	98	4%
Priority need: vulnerable as result of old age	41	2%
Priority need: applicant is / household includes a pregnant woman	33	1%
Priority need: vulnerable for other special reason	25	1%
Priority need: vulnerable as fled home because of violence / threat of violence (not domestic abuse)	24	1%
Priority need: applicant is care leaver and aged 18 to 20 years	23	1%
Priority need: vulnerable as result of learning difficulty	21	1%
Priority need: former asylum seeker	17	1%
Priority need: vulnerable as a care leaver 21+	11	0%
Priority need: vulnerable as been in custody or on remand	10	0%
Priority need: homeless because of fire, flood or other emergency	8	0%
Priority need: alcohol dependency	5	0%
Priority need: drug dependency	2	0%
Not in priority need	1	0%
Priority need not assessed as reapplication duty owed	1	0%
Priority need: applicant aged 16 or 17 years	1	0%
Priority need: homeless because of fire flood or other emergency	1	0%
Priority need: vulnerable as served in HM Forces	1	0%
Priority need: vulnerable served in HM Forces	1	0%
No priority need	0	0%
Priority need: homeless because of fire, flood or other emergency	0	0%
Priority need: vulnerable been in custody or on remand	0	0%
Total households owed main duty	2205	100%

[36] Rachel Harker et. al., 2025, Who provides informal care?

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

Does your analysis indicate a disproportionate impact relating to Looked after children, Care Leavers, Care and fostering experienced children and adults (Especially considering for age, ethnicity, language, and various intersections). **Also consider our Corporate Parenting Responsibility in connection to your activity.**	YES

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

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

In 2023 a total of 345 children were in care in Brighton & Hove. The number of children in care varies from year to year but has fallen over time in the city. In the same year, 163 children ceased to be looked after by the local authority.

Commented [CB26]: Might be helpful to add this info if you feel it relevant:

A full council meeting in July 2023 voted to recognise care leavers as a protected characteristic, recognising that care experienced people face significant barriers that impact them throughout their lives.

Analysis of housing service data on support needs for homelessness applicants between the 2020 and 2024 calendar years combined indicates that those recorded as care leavers at the time of their initial assessment were 0.6% (16 of 2,754) of those owed a prevention duty, 2.5% (146 of 5,741) of those owed a relief duty and 2.4% (53 of 2,205) of those accepted for the main housing duty.

Evidence compiled by the UK Parliament Education Committee indicates that care leavers are particularly vulnerable to becoming homeless.[37] In their call for evidence, they received an estimate that a third of care leavers become homeless within two years of leaving care, and that a quarter of homeless people have been in care. Analysis of national data indicates that most care leavers (61.2%) were already homeless when they approached a local authority for help.[38]

Research undertaken by Centrepoint in 2017 indicates that care leavers experience additional challenges on leaving care.[39] These include

- Difficulty managing money
- They are unable to afford to rent
- They may have to move to an unfamiliar area
- They have to get used to less support
- Higher risk of losing their tenancy and becoming homeless

Issues raised in relation to care experience in the consultation for the strategy included:

- Importance of the council's corporate parenting role
- Risk of care leavers being deemed intentionally homeless when their behaviours and trauma impact relationships and management of tenancies.
- Calls for care leavers to maintain their priority until they are 25

Brighton & Hove City Council's as corporate parent has collective responsibility to act as a good parent for the children and young people in its care, including care leavers. This legal duty involves all council employees, elected members, and commissioned services supporting these young people's education, health, welfare, and overall well-being.

In July 2023 the council voted to recognise care leavers as a protected characteristic, recognising that care experienced people face significant barriers that impact them throughout their lives.

[37] UK Parliament: Education Committee, 2025, Children's social care
[38] Become, 2023, 33% increase in homelessness among care leavers
[39] Centrepoint, 2017, From care to where? Care leavers' access to accommodation

Recommendations

This protected characteristic has intersections with age, sex, ethnicity, disability and others and should be read in conjunction with those sections.

Proposals set out in the draft strategy may have a positive impact in relation to this characteristic if the specific needs of care experienced young people are addressed in the delivery of the strategy.

5.14 Homelessness:

Does your analysis indicate a disproportionate impact relating to people experiencing homelessness, and associated risk and vulnerability? (Especially considering for age, veteran, ethnicity, language, and various intersections)	YES

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

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

A detailed review of homelessness in the city has informed the development of the draft strategy. Data on homelessness and rough sleeping can be found in the review document.

Intersections between homelessness and protected characteristics are identified in other sections of this equality impact assessment. Two categories of risk in relation to protected characteristics and their intersections need to be highlighted here: the risk of becoming homeless and increased risk when homeless. Other factors, not related to characteristics protected under the Equality Act 2010, are also likely to compound risk, for example, substance misuse, employment status, educational achievement, and personal circumstances. A data led approach to risk profiling and service development means that measures to improve and use equalities and other data as set out **Recommendation 24** will be key to successful delivery.

Although the number of people experiencing rough sleeping in the city is low compared to the overall number of people experiencing homelessness, outcomes for this group are particularly poor. People who sleep rough or in other forms of insecure accommodation have nearly five times the mortality risk compared to the general population.[40] The evidence shows significantly elevated rates of infectious diseases, musculoskeletal disorders and chronic pain, skin and foot problems, dental problems and respiratory illness. People experiencing rough sleeping are twice as likely to die of stroke compared to the poorest people with stable accommodation.[41]

In March 2025, of people sleeping rough over the month, 13% were returning to sleeping rough, and of these returners, 30% had moved into settled accommodation in the previous year - indicating high rates of housing breakdown and repeat homelessness. Long-term rough sleepers (those seen 2 or more times within a 6-month period) are the largest group of people sleeping rough over the month and have had the largest year-on-year increase nationally.[42]

People experiencing rough sleeping have often faced severe disadvantage including mental ill health, dependency on drugs and alcohol, adverse childhood experiences and histories of trauma and domestic abuse. Women who sleep rough are more likely than men to have experienced traumas, including self-

[40] James White et. Al., 2021, Mortality among rough sleepers, squatters, residents of homeless shelters or hotels and sofa-surfers: a pooled analysis of UK birth cohorts

[41] Public Health England, 2020, Health matters: rough sleeping

[42] Ministry for Housing, Communities and Local Government, 2025, Rough sleeping data framework, March 2025

harming and domestic violence, and experience of domestic violence and abuse is very common among women who become homeless.[43]

The rate of rough sleeping in Brighton & Hove has risen from 20 per 100,000 population in 2020 to 30 per 100,000 in 2025.

Issues raised in the consultation included:

- Need for financial and benefits advice to help prevent financial difficulties resulting in homelessness
- Identification of risk of homelessness plus early intervention / prevention
- Need for trauma/psychologically informed practice and training for staff
- Funding for organisations working with homeless people being reduced
- Support for innovative approaches but also calls to use evidence of effectiveness where this exists
- Systems and processes e.g. bidding for housing are complex and hard to understand for many people experiencing homelessness
- Intersection of homelessness with protected characteristics e.g. LGBTQ+, disability, ethnicity and sex
- Importance of partnership working to tackle increasing homelessness

Details of themes arising in the public consultation and the council's response can be found in the consultation report published with cabinet papers for decision on 11 December 2025.

24. Recognise the significant intersection between people experiencing rough sleeping and people experiencing multiple compound needs requiring a continued focus on this overlapping cohort

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

Does your analysis indicate a disproportionate impact relating to Domestic Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)?	YES

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

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

Housing service data on homelessness applications between the 2020 and 2024 calendar years combined includes the main reason for the applicant's loss of their settled home, with a category for cases where they are a victim of domestic abuse. This applied to 4% (104 of 2,754) of households owed a prevention duty and 9% (543 of 5,741) of those owed a relief duty. Of the 2,205 households whose homelessness was not prevented or relieved and who were accepted for the main duty during the same period, 4% were recorded as in priority need specifically because the applicant fled domestic abuse.

The proportion of people who are at risk of and/or have experienced domestic abuse is higher (16%) based on the data on additional support needs for homelessness applicants. The data on additional support needs includes three categories relating to different types of abuse, as shown in the table below. This shows that significant proportions of homeless applicants are likely to be survivors of domestic, sexual and/or other forms of abuse, ranging from 8% of those owed a prevention duty, 17% of those owed a relief duty, and 20% of those accepted for the main housing duty.

[43] Public Health England, 2020, Health matters: rough sleeping

All support needs (overlapping categories) recorded at time of assessment for homeless application	Prevention duty owed (2020 to 2024)	Relief duty owed (2020 to 2024)	Main duty accepted (2020 to 2024)
At risk of/has experienced abuse (non-domestic abuse)	2%	4%	4%
At risk of/has experienced domestic abuse	6%	12%	16%
At risk of/has experienced sexual abuse/exploitation	2%	3%	4%
At least one of the above	8%	17%	20%

Analysis of housing service data over time points to a significant increase in the numbers of victims of domestic abuse approaching the council at the relief stage (where they are already homeless). The table below shows the number of people assessed as owed a relief duty by main reason.

Calendar Year of assessment: Relief duty owed	Family or friends no longer willing or able to accommodate	End of private rented tenancy	Victim of domestic abuse	Eviction from supported housing
2020	323	117	41	45
2021	308	134	96	87
2022	224	186	106	84
2023	239	204	144	117
2024	290	206	156	116
Total	1,384	847	543	449

Source: Home Connections (data extracted on 13/01/25 using the 'Hope Extract' report)

The pan-Sussex domestic abuse accommodation strategy identified that over a three-month period, 64% of refuge referrals in Brighton & Hove where a postcode was provided were from out of area, indicating significant cross-boundary movement of survivors seeking safety.

Data reporting by Brighton & Hove City Council indicates that between 1 April 2024 and 31 March 2025, 594 domestic abuse survivors received accommodation support. This represents a rise of almost 36% (from 438 to 594) since 2022/23 the earliest year data is available). Of these, the majority (368) were supported in safe accommodations schemes, with 153 in Sanctuary scheme accommodation and 72 in refuge accommodation. Of the 594 individuals, 78% (n=466) were female adults, 8% (50) were male adults, and 6% (n=38) were trans or non-binary adults. There were 40 children (7%) living in domestic abuse safe accommodation.

Data on other characteristics of the 594 people supported in domestic abuse safe accommodation for Brighton & Hove in 2024/25 indicated over representation of Black and minoritised people, 33.5% (n=199) compared to 26% for the city as a whole; 27.6% were disabled (n=164) compared to 19% for the city as a whole; 12.1% (n=72) were recorded as LGBTQ+ compared to 10.7% of the city population.

The 4 most common recorded support needs for survivors supported in domestic abuse safe accommodation were mental health history (n=315 or 53%), drug support needs (n=11 or 20%), alcohol support needs (n=69 or 11.6%) and young person under 25 (n=52 or 8.8%). A total of 110 individuals could not be supported. While in many areas of the country this is due to service capacity issues, no household fell into this category, with most either declining a referral or were not contactable.

Analysis by the Office for National Statistics (ONS) of National Crime Survey data indicates that for the survey year ending March 2024, 8.0% of people aged 16 years and over experienced domestic abuse in the last year (equivalent to 3.9 million people).[44] When breaking the figures down by sex, they estimate that 9.5% of women (2.3 million) and 6.5% of men (1.5 million) have experienced domestic abuse in the last year.

[44] Office for National Statistics, 2025, Redevelopment of domestic abuse statistics: research update May 2025

The ONS also estimate 1 in 4 (26.1%) people aged 16 years and over have experienced domestic abuse since the age of 16 years, (equivalent to 12.6 million people). Split by sex, they estimate that 30.3% of women and 21.7% of men have experienced domestic abuse since the age of 16 years (equivalent to 7.4 million and 5.1 million, respectively).

Consultation responses included the following points

- there is under-provision of refuge accommodation for trans survivors of domestic abuse
- the gendered nature of domestic abuse was highlighted with consultees calling for protected, specialist services for women, children, and trans people fleeing abuse,
- the importance of recognising domestic and sexual violence as a root cause of homelessness
- the impact of financial hardship and economic abuse
- aneed for improved data collection
- Greater visibility for single women and trans people experiencing homelessness due to abuse
-

Recommendations

This characteristic has many possible intersections including but not limited to sex and gender identity, age, gender reassignment, ethnicity and disability. This section should therefore be read in conjunction with these sections and their intersections considered.

Proposals set out in the draft strategy may have a positive impact with the draft strategy recognising the importance of domestic abuse and a cause of homelessness.

25. **Ensure that the statutory domestic abuse accommodation strategy is updated as soon as possible and that the planned review of supported accommodation in the city and the development of a supported accommodation strategy considers the needs of survivors of domestic abuse.**

    See also recommendation 26

5.16 Socio-economic disadvantage:

Does your analysis indicate a disproportionate impact relating to Socio-economic Disadvantage? (Especially considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections)	YES

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

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

The lack of affordable housing options in the city negatively impacts people at socio-economic disadvantage and places them at higher risk of becoming homeless. Poor housing conditions also impact the health and wellbeing of low-income households. Inadequate insulation contributes to higher energy bills. This is likely to intersect with other characteristics (e.g. older people, young people, people from Black and Racially Minoritised groups and people with disabilities amongst others are more likely to have lower household income).

The table below shows the employment status of main homeless applicants over 5 years from 2020 to 2024. For all 3 housing duties a significant proportion of applicants were either registered unemployed or not working because of long term sickness or disability.

Employment status of main applicant	Prevention duty owed	Relief duty owed	Main duty acceptance

At home/not seeking work (including looking after the home or family)	5%	3%	7%
Don't know / Refused	4%	9%	5%
Full-time student	1%	1%	1%
Not registered unemployed but seeking work	2%	3%	2%
Not working because of long term sickness or disability	21%	24%	26%
Other	1%	2%	1%
Registered employed but currently off work due to ill health / disability on reduced or SSP	1%	1%	1%
Registered employed but currently off work on maternity/paternity/adoption leave on reduced or statutory pay	1%	0%	1%
Registered unemployed	25%	39%	31%
Retired (including retired early)	5%	2%	4%
Training Scheme / apprenticeship	0%	0%	0%
Working: 30 hours a week or more (contracted, regular or guaranteed)	13%	6%	7%
Working: irregular hours with variable or irregular pay	2%	1%	1%
Working: less than 30 hours a week (contracted, regular or guaranteed)	17%	6%	11%
Not recorded	2%	2%	2%

Source: NEC Housing (data extracted 31 Dec 2024)

The strategy is likely to have a positive impact on people at socio-economic disadvantage. Measures are included to support people to remain in their homes by tackling issues such as rent arrears and other forms of debt, education and skills etc. Other measures likely to have a positive impact include improving the quality of temporary accommodation and reducing the use of B&B and out of area placements for families with children. The draft strategy also makes a commitment to fairness and inclusion, including tackling the stigma and discrimination faced by people experiencing homelessness.

5.17 Human Rights:

Will your activity have a disproportionate impact relating to Human Rights?	YES

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

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

The right to adequate housing is a human right recognised in international human rights law. Without a right to housing, many other basic rights are compromised, including the right to family life and privacy, the right to freedom of movement, the right to assembly and association, the right to health, and the right to development. Adequate housing is essential for human survival with dignity. The right to adequate housing is defined by the United Nations as the right to live somewhere in security, peace, and dignity.

In 2021 the council was the first local authority in the United Kingdom to sign up to the Homeless Bill of Rights. This committed the council to respect and uphold the rights of people who are experiencing homelessness, particularly their right to housing.

The strategy is likely to have a positive impact on human rights with its focus on preventing homelessness, improving temporary accommodation and providing support to those who become homeless.

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

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

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

Intersections and complex impacts are considered in the sections above. Given the nature of this wide-ranging strategy, it has not been possible to identify and consider all such intersections. A number of key issues not considered above include:

Multiple Compound Needs – An assessment carried out as part of the Joint Strategic Needs Assessment programme in 2020 identified that around 90% of this population are homeless, with most having a significant history of rough sleeping. The SHMA identifies a gap in accommodation for people with multiple complex/compound needs, noting that this is an extremely challenging cohort to house. The housing strategy and Y1 action plan committed the council to work with partners to improve services and support for people with multiple, compound needs. This is reflected in the third priority of the draft homelessness and rough sleeping strategy.

People with some characteristics and intersections are at higher risk of exploitation and harm, for example, cuckooing or modern slavery. This includes, but is not limited to, care leavers, people with learning disabilities, or people with mental health issues. The increased complexity and level of need of those placed in social housing or living in the private rented sector is noted in the SHMA and was also raised as a concern by respondents to the consultation.

Recommendations relating to specific characteristics and their intersections are set out in each section of this EIA. There is one cross cutting recommendation below.

26. The collection and analysis of equality data should be reviewed and, where required, improved. This included reviewing the systems and processes used to collect and analyse equalities data.

7. Action planning

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

45

Commented [CB27]: The EIA contains 24 recommendations with no clarity around priority, timescale, or resourcing.

To assist decision-makers and support monitoring, a summary table would be useful that highlights for each action:

- Priority (High/Medium/Low)
- Timescale (Year 1-5)
- Success measures
- Resource implications

Commented [CB28]: Given the significance and cross-cutting nature of this action, can it be made SMART?

Would any of the following be useful accompanying actions?

conduct a comprehensive data audit within XX months

Develop a data improvement plan with clear timelines

Commented [SM29R28]: Hi @Chris. See the draft action plan. I started to add in Yx Qx against each of the actions. I really do understand the need to make these SMART but it felt like such a 'finger in the air' exercise that in the end I removed them. We are still to set up the data, research and insight group - this is likely to be Q4 2025/26. They really need to do the work on the prioritisation, baselining, reporting etc.. We should have the strategy action plan in place by end Q4 25/26. It will not go to cabinet with the strategy in December for a variety of reasons (unclear funding envelope, need to get partner sign off for actions etc). We're asking for delegated authority for Genette Laws & Cllr Williams to agree this.

Commented [CB30R28]: Understood - thanks for this additional context Steve.

Homelessness and rough sleeping strategy delivery plan – to be developed Q4 2025/26

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

- Summarise relevant SMART actions from your data insights and disproportionate impacts below for this assessment, listing appropriate activities per action as bullets. (This will help your Business Manager or Fair and Inclusive Action Plan (FIAP) Service representative to add these to the Directorate FIAP, discuss success measures and timelines with you, and monitor this EIA's progress as part of quarterly and regular internal and external auditing and monitoring)

Y0 = 2025/26, Y1 = 2026/27

1. Data, monitoring and research

Priority: Medium-High
Timescale: Year 0-1
Key actions:

- Seek to establish data, research and insight working group
- Agree baseline data for strategy monitoring
- Review and revise data collection for protected characteristics with a focus on gaps identified in this EIA e.g. young people
- Implement regular reporting mechanisms on equality outcomes
- Identify and implement priority recommendations from Gypsy, Roma Traveller needs assessment
- Seek to take forward needs assessment for people living in TA
- Review trend data and agree next steps on older people presenting to services

Resource implications:

- Staff time
- Potential need for externally commissioned TA needs assessment if unable to progress through JSNA

2. Workforce development and training

Priority: Medium-High
Timescale: Year 1-3
Key actions:

- Ensure all staff have undertaken mandatory equality and diversity training across homelessness & housing needs services FIAP HCW-W05
- Review options for additional EDI learning for areas identified in this EIA e.g. suicide prevention, trans inclusion, cultural competency
- Continue roll out of trauma-informed training & updates for all homelessness & housing needs staff

Resource implications:

- Mainly within existing resources
- Potential costs in buying in additional EDI learning

3. Prevention

Priority: High
Timescale: Year 1-5
Key Actions:

- Develop 'test and learn' methods for targeted prevention and early intervention for vulnerable groups with a focus on families with children, single men, and people from Black, Mixed and Other ethnic groups
- Monitor impact and scale up if appropriate
- Strengthen partnership working for prevention with a focus on engaging universal services
- Implement risk assessment tools that consider equality factors

Resource implications:

- Potential additional staffing or commissioned services if targeted prevention models rolled out
- Potential resource implications for universal services

4. Temporary accommodation

Priority: High
Timescale: Year 1-4
Key actions:

- Drive up quality standards in interim temporary accommodation
- Explore ways to reduce use of B&B and out of area placements for families with children
- Explore accommodation meets diverse cultural and religious needs
- Explore how to ensure that there are sufficient women only and single person spaces available
- Develop accessible accommodation options

Resource implications:

- Dynamic purchasing model resourced
- Potential cost implications from placements within city
- Work to diversify TA supply underway

5. Support

Priority: Medium-High
Timescale: Year 1-4
Key Actions:

- Explore options to improve access to mental health and substance misuse support
- Continue service integration between health, social care and housing
- Improve access to healthcare and social services for rough sleepers through homeless healthcare hub

Resource implications:

- Service integration depends on partners being able to jointly fund – risk
- Enhanced support services have funding implications
- Homeless healthcare hub requires premises and funding from partners to be viable

6. Children, families and young people

Priority: High
Timescale: Year 1-5
Key Actions:

- Develop support and service offer to families with children experiencing homelessness
- Explore options to make our services more child-friendly

Resource implications:

- No current provider market. Would require resourcing to stimulate provision
- Work to diversify TA offer underway

7. Safety and domestic abuse

Priority: High
Timescale: Year 1-3
Key Actions:

- Review refuge and safe accommodation provision through supported housing review and refresh of DA accommodation strategy
- Strengthen approaches to recording and safety planning for TA placements

Resource implications:

- Expected new burdens funding to support review of supported housing
- Staff capacity required for DA accommodation strategy refresh

8. Outcome of your assessment

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

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

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

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

This equality impact assessment considers the implications of proposals set out in the draft homelessness and rough sleeping strategy 2025 to 2030. The strategy is intended to be a high-level document, setting out the principles and priorities to contribute to the council's ambitious goal to deliver accessible, affordable and high-quality homes for everyone in Brighton & Hove. If that goal is achieved, then the strategy will have a positive impact on people with the protected and other characteristics considered in this EIA.

The EIA identifies several factors relating to protected characteristics and their intersections which impact homelessness and rough sleeping. The council can directly influence those factors relating to its statutory duties and its other services. There are other factors where it needs to work in partnership to deliver improved outcomes. Given the breadth and nature of the strategy, it has not been possible to identify the equality impact of specific proposals therefore separate equality impact assessments will need to be undertaken in line with council policy on all service development and change proposals undertaken as part of the implementation of the strategy.

9. Publication

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

10. Directorate and Service Approval

Signatory:	Name and Job Title:	Date: DD-MMM-YY
Responsible Lead Officer:	Harry Williams, Director of Housing People Services	20-11-25
Accountable Manager:	Alice Morel, Head of Homelessness and Housing Options	31-10-25
	Aaron Burns, Head of Temporary and Supported Accommodation	3-11-25

Notes, relevant information, and requests (if any) from Responsible Lead Officer and Accountable Manager submitting this assessment:

EDI Review, Actions, and Approval:

Equality Impact Assessment checklist and sign-off

EIA Reference number assigned:

EDI Business Partner to cross-check against aims of the equality duty, public sector duty and our civic responsibilities the activity considers and refer to relevant internal checklists and guidance prior to recommending sign-off.

Once the EDI Business Partner has considered the equalities impact to provide first level approval for by those submitting the EIA, they will get the EIA signed off and sent to the requester copying the Head of Service, Business Improvement Manager, Equalities inbox, any other service colleagues as appropriate to enable EIA tracking, accountability, and saving for publishing.

Signatory:	Name:	Date: DD-MMM-YY
EDI Business Partner:	Chris Brown	24-Nov-2025
EDI Manager:		
Head of Communities, Equality, and Third Sector (CETS) Service: *(For Budget EIAs/ in absence of EDI Manager/ as final approver)*	N/A	

Notes and recommendations from EDI Business Partner reviewing this assessment:

Notes and recommendations (if any) from EDI Manager reviewing this assessment:

Notes and recommendations (if any) from Head of CETS Service reviewing this assessment:

Brighton & Hove City Council

Cabinet

Agenda Item 90

Subject: **Royal Pavilion & Museums Trust Service Fee 2026-31**

Date of meeting: **Thursday 11th December**

Report of: **Cabinet Member for Culture, Heritage and Tourism**

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

Contact Officer: **Name: Louise Peim**

Email: louise.peim@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 report is seeking cabinet approval of the fee term 2026-31 for the Royal Pavilion & Museums Trust (RPMT) Service Agreement. The activities of the Trust support our Council Plan objective, A city to be proud of.

2. Recommendations

2.1 Subject to the matters set out in the part 1 and 2 reports Cabinet agrees to the proposed annual fee of £1.9m for the fee term 2026-31 for the RPMT Service Agreement.

2.2 Cabinet agrees to the deferral of loan repayments to 2031.

2.3 Cabinet agrees to delegate authority to the Corporate Director City Operations in consultation with the cabinet member to make such variations as required to the contractual documentation between the Council and RPMT to give effect to the recommendations above.

3. Context and background information

3.1 RPMT have been operating as an independent organisation for five years. Services transferred from the council in 2020. The Services Agreement held between the council and the Trust sets out five-year fee terms. This report seeks approval of the second five-year fee term within the twenty-five year contractual agreement.

3.2 The Services Agreement sets out service levels across the assets that RPMT are custodians of. The assets are Royal Pavilion & Garden, Brighton Museum & Art Gallery, Preston Manor and Garden, Hove Museum & Garden and Booth Museum.

3.3 The first five-year fee term, 2020-2025, established a reducing fee from the council. The fee for this current operating year 2025/26 is set at £0.870m. However, due to contractual clauses relating to pay award reimbursements, the council's contribution is likely to be £2.1m this financial year. For the next five-year term the council is seeking to consolidate the contribution it makes to the Trust and proposes £1.9m as a static fee from 2026-31.

3.4 The council has worked collaboratively with RPMT to agree the fee in principle, pending this cabinet decision. Close consideration has been given to the Trust's business and operating model with learning taken from the first five-year term.

3.5 RPMT's first five years as an independent organisation presented some exceptional challenges. Transferring services during a global pandemic had a significant impact on the business model. Visitor numbers have been slower to recover than anticipated, with an annual average of 15% fewer visitors than projected. Brexit has also had an adverse impact on the cohorts of European students that the business model had previously relied on when services were with the council.

3.6 Despite these challenges the Trust can demonstrate significant achievements, exceeding key performance indicators within the Services Agreement. They have delivered an engaging exhibition programme including Lee Miller: Undressed, Roger Bamaber: Out of the Ordinary, Wildlife Photographer of the Year, ABBA: One Week in Brighton and others.

3.7 RPMT's educational programmes served 91% of Brighton & Hove's schools in 2024-25. During 2024-25 they worked with more than 40 local community groups, 135 people volunteered across the asset base, contributing 7,331 hours, developing skills and reducing isolation.

3.8 Strategic and corporate partnerships have been built with a range of organisations to bring added value to the city: The Universities of Brighton and Sussex; Brighton & Hove Albion FC; Brighton & Hove Buses; Sussex County Cricket Club; Hove Civic Society; Plumpton College; Queer Heritage South and others.

3.9 RPMT have secured over £6m in capital investment for the estate, including £4.6m from National Lottery Heritage Fund and £1.46m from Arts Council England to replace the roof of the main Brighton Museum gallery.

3.10 To mitigate challenges presented by global events, the Trust undertook three staff restructures, creating a leaner and more agile staffing structure. This has achieved approximately £1m annual savings for the Trust.

3.11 The Trust was established without any reserves or working capital. In recognition of this financial challenge, particularly in the midst of a global pandemic with full building closures in place, a £4m loan facility was agreed by the Council's Policy & Resources Committee in 2020. RPMT have drawn down £3m from this facility, with the most recent drawdown agreed by cabinet in June 2024. A repayment plan was agreed with payments due to commence this financial year. Due to ongoing financial challenges, RPMT have not been able to meet these repayments.

3.12 In order to realise their business plan, inclusive of a proposed £1.9m annual fee from the council, loan repayments are not viable within this model until 2031. The Trust need to build reserves in line with their Reserves Policy, as identified in Charity Commission legislation, to ensure that they are sustainable. However, it is recommended if the Trust begin to generate revenue above their reserves policy, the council will claim loan repayments. If they do not exceed agreed level of reserves, loan repayments will commence in 2031.

4. Analysis and consideration of alternative options

4.1 As demonstrated above, RPMT have achieved a great deal since becoming an independent Trust. The objectives of transferring the services out of the council have been achieved through securing external funding to invest in the assets. Commercial funding has grown by over 100% since 2022/23. External factors including the pandemic and Brexit have impacted significantly on the business model and visitor numbers have not returned to pre-pandemic levels. This picture is reflected at a national level.

4.2 An alternative option is to bring the services back in-house, which would incur an estimated budget pressure of £2.1m a year. This would require all staff to be transferred back to the council and opportunities to secure external funding that is only available to charitable organisations would be lost.

4.3 Another option is to reduce service levels and close buildings in order to reduce the annual financial contribution. However, this would impact on the city's cultural and education offer and cause loss of employment opportunities in the city.

4.4 If the council pursues loan repayments, RPMT will become insolvent during year one of the new fee term, as their business plan will fail. The services would revert back to the council, incurring a budget pressure of approximately £2.1m, as outlined above.

5. Community engagement and consultation

5.1 There has not been any community engagement and consultation for the purpose of this report.

6. Financial implications

6.1 The current service agreement carries significant financial risk and uncertainty, due predominantly to the contractual clauses relating to pay award reimbursements. The impact is a total contribution of £2.1m in 2025/26 resulting in a budget pressure for 2025/26 of £0.495m. This has been reported through the council's TBM reports and is being mitigated in part from other underspends within the service.

6.2 By not fixing the fee, it continues to expose the council to financial risk an uncertainty and creates on-going issues across the MTFS period. A fixed fee of £1.9m represents a reduction of £2.1m on the current level. This still results in a budget pressure of £0.300m for 2026/27 but removes the risk of future increases contributing to the council being able to develop a more sustainable and less volatile MTFS. The pressure is forming part of the budget discussions for next year, which are required to be approved by Full Council in February 2026.

6.3 The business plans and proposals submitted by RPMT have been reviewed and due diligence undertaken to ensure that they are reasonable and reflect the risks that the sector is facing at the moment. However, this does not negate the fact it is a business plan and can be impacted by economic circumstances beyond either entity's control. Therefore, regular meetings between the council and RPMT will be conducted to review the financial performance and take any early action required to prevent any budget pressures for the council.

6.4 In order to agree a fixed fee of £1.9m RPMT have requested the loan repayments to be deferred to the end of the fee term in 2031. At the July 2024 cabinet a repayment schedule was agreed which due to the financial difficulties RPMT have faced they have been unable to make any repayments to date. Therefore, the council is carrying £3m on its balance sheet due for repayment as at March 2025.

6.5 The loan to the RPMT is interest free, and therefore there is no impact on the interest for deferring the loan repayments. There is, however, the loss of investment income for the council not being able to invest the funds in line with the original loan repayment schedule. However, any investment income loss has to be balanced with the risk of loss from non-repayment by RPMT were the council not to support the loan deferral. Agreeing to claim repayments if RPMT exceed their reserves position, as part of the new agreement, will provide the council with the opportunity to receive loan repayments upon review of RPMT's annual accounts ahead of 2031 when the repayment of the loan will be required to commence.

Name of finance officer consulted: Craig Garoghan Date consulted : 06/11/2025

7. Legal implications

7.1 The service agreement with RPMT provides for the service fees for each year to be set and agreed on a five yearly basis. The next five-year fee term commences 1st April 2026. In making the adjustments to the loan facility proposed by this report, an analysis will need to be made to ensure compliance with subsidy control rules. Further legal comments are set out in the part 2 report.

Name of lawyer consulted: Siobhan Fry Date consulted: 02.12.25

8. Risk implications

8.1 The risk of not agreeing the proposed fee of £1.9m, is that the current fee term rolls forward. This means that the opportunity to consolidate the council's financial contribution to the Trust will be missed.

8.2 Providing a reduced fee poses a risk to RPMT's ability to continue to operate independently. The risk is that the services will come back to the council causing significant budget pressures.

8.3 The risk relating to loan repayment deferral is that the business model will not succeed if loan repayments are made.

9. Equalities implications

9.1 As an independent organisation RPMT have adopted their own equalities policy and work with a diverse range of communities to support their objectives and ensure that the assets and services are accessible to all in the city.

9.2 RPMT have collaborated on the council's Ant-Racist Strategy and have become a Dementia Friendly organisation under the council's scheme. The Trust delivered a two-year funded Culture Change programme, which included a commitment to decolonising collections.

10. Sustainability implications

10.1 RPMT have worked with the council's net zero team to consider opportunities for the asset base to be more sustainable. RPMT are custodians of some of the council's most valuable heritage assets. Heritage buildings require extensive investment to make them future proof. Funding secured for the Brighton Museum roof replacement has resulted in thermal improvements to the building.

11. Health and Wellbeing Implications:

11.1 The activities of RPMT support health and wellbeing through the cultural offer they provide. It is widely recognised that engaging in culture improves people's sense of wellbeing. RPMT's volunteer programme engages 135 volunteers annually, providing a range of opportunities to provide a positive impact on people's health and wellbeing as well as enhancing skills and employment opportunities.

Other Implications

12. Procurement implications

12.1 There are no direct procurement implications. RPMT is an established independent charitable Trust.

13. Crime & disorder implications:

13.1 None identified.

14. Conclusion

14.1 The proposed £1.9m annual fee will consolidate the financial contribution made to RPMT, creating certainty with budget setting over the next five years. The fee will enable the Trust to deliver the current service levels outlined in the Services Agreement.

14.2 The service fee will comprise 19% of RPMT's overall projected annual income, which is lower than some other local authorities contributions to independent museums Trusts (Birmingham provide 25% of overall income for the local museums Trust and Sheffield 45%).

14.3 Whilst a budget pressure of £0.3m will be incurred during the first 2-3 years, by year four of this fee term, the Council will begin to see small savings with a fee of £1.9m. This will achieve the original objective of transferring the services out of the council, to incrementally reduce costs.

14.4 It will be challenging for RPMT over the next five years as they will receive a £0.2m reduction from the council. The Trust need to realise their business plan through achieving the projected 4% increase in commercial income and visitor numbers. For this reason, it is recommended that loan repayments are deferred to provide every opportunity for RPMT to succeed.

14.5 As outlined, if the Trust exceed their reserves policy, the council will claim repayments. If this does not happen, repayments will commence in 2031.

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