

# Cabinet

Date: **22 January 2026**

Time: **2.00pm**

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

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

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

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Chief Executive  
Hove Town Hall  
Norton Road  
Hove BN3 3BQ

Date of Publication - Wednesday, 14 January 2026

# AGENDA

## Part One

## Page

### 94 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*

### 95 MINUTES

To Follow

To consider the minutes of the meeting held on 11<sup>th</sup> December 2025.

### 96 CHAIR'S COMMUNICATIONS

### 97 CALL OVER

### 98 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 16<sup>th</sup> January 2026.
- (c) **Deputations:**  
To receive any deputations submitted by the due date of 10am on the 12<sup>th</sup> January 2026.

### 99 ISSUES RAISED BY MEMBERS

To consider the following matters raised by Members:

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

**100 MATTERS REFERRED TO THE EXECUTIVE**

**101 REPRESENTATIONS FROM OPPOSITION MEMBERS**

**102 YOUTH PARTICIPATION UPDATE** **7 - 16**

*Contact Officer:* Joanne Templeman  
*Ward Affected:* All Wards

**103 MORE RECYCLING, LESS WASTE - A NEW COLLECTION MODEL** **17 - 26**

*Contact Officer:* Rachael Joy  
*Ward Affected:* All Wards

**104 2025/26 MID-YEAR COUNCIL PLAN PROGRESS UPDATE** **27 - 152**

*Contact Officer:* Rima Desai, Luke Hamblin  
*Ward Affected:* All Wards

**105 SUSSEX AND BRIGHTON DEVOLUTION AND MAYORAL ELECTION** **153 - 172**

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

**106 COUNCIL TAX BASE AND BUSINESS RATES RETENTION  
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*Contact Officer:* Heather Killick  
*Ward Affected:* All Wards

**107 CIRCULAR ECONOMY ROUTEMAP AND ACTION PLAN 2025-2035** **187 - 244**

*Contact Officer:* Sophie Moss  
*Ward Affected:* All Wards

**108 ORBIS SERVICES - FUTURE MODEL** **245 - 254**

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

**109 URGENT WORK FOR INCOMING & LATERAL ELECTRICAL MAINS  
REPLACEMENT IN COUNCIL HOUSING** **To Follow**

*Contact Officer:* Martin Reid  
*Ward Affected:* Kemptown; Whitehawk & Marina

<b>110 HOUSING MANAGEMENT PROCUREMENT FOR BRICKFIELDS DEVELOPMENT</b>	<b>255 - 264</b>
 <i>Contact Officer: Anne Richardson-Locke</i> <i>Ward Affected: Wish</i>	

<b>111 BIODIVERSITY HABITAT BANK PILOT AT ST MICHAELS FIELD</b>	<b>265 - 278</b>
 <i>Contact Officer: James Woodward</i> <i>Ward Affected: Patcham &amp; Hollingbury</i>	

## **PART TWO**

<b>112 URGENT WORK FOR INCOMING &amp; LATERAL ELECTRICAL MAINS REPLACEMENT IN COUNCIL HOUSING (EXEMPT CATEGORY 3)</b>	<b>To Follow</b>
 <i>Contact Officer: Martin Reid</i> <i>Ward Affected: Kemptown; Whitehawk &amp; Marina</i>	

<b>113 HOUSING MANAGEMENT FOR BRICKFIELDS DEVELOPMENT (EXEMPT CATEGORY 3)</b>	<b>279 - 282</b>
 <i>Contact Officer: Anne Richardson-Locke</i> <i>Ward Affected: Wish</i>	

<b>114 BIODIVERSITY HABITAT BANK PILOT AT ST MICHAEL'S FIELD (EXEMPT CATEGORY 3)</b>	<b>283 - 288</b>
 <i>Contact Officer: James Woodward</i> <i>Ward Affected: Patcham &amp; Hollingbury</i>	

<b>115 PART TWO MINUTES OF THE PREVIOUS MEETING</b>	<b>To Follow</b>
 To consider the Part Two minutes of the meeting held on 11 <sup>th</sup> December 2025.	

<b>116 PART TWO PROCEEDINGS</b>
 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](mailto:john.peel@brighton-hove.gov.uk)) or email [democratic.services@brighton-hove.gov.uk](mailto:democratic.services@brighton-hove.gov.uk)

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- You will be asked to sign in upon arrival and may be asked to show proof of identity.

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- Paint spray or similar items;
- Padlocks, chains and climbing gear;

- Items that make a noise (e.g. whistles, loud hailer, megaphones); and,
- Banners, placards and flags or similar items.

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You must follow the Mayor's/Chair's direction, including any requests to sit down or stop acting in a way that disrupts the Council business.

In most meetings, there are no incidents and Council is not disturbed. We hope this continues so there is no need for the Mayor or any Chair of a meeting to take these actions.

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

# Brighton & Hove City Council

## Cabinet

## Agenda Item 102

**Subject:** Youth Participation update

**Date of meeting:** 22<sup>nd</sup> January 2026

**Report of:** Cabinet Member for Children, Families & Youth Services

**Contact Officer:** Name: Gemma Doughty Youth & Commissioning Service Manager  
Email: [gemma.doughty@brighton-hove.gov.uk](mailto:gemma.doughty@brighton-hove.gov.uk)

**Ward(s) affected:** All

**For general release**

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

- 1.1 Following the decision to move to a Cabinet system, the Youth Council has worked with council Officers to review its operating model to be better aligned with the council. This report sets out the proposals from representatives of the Youth Council to move to a Cabinet system.
- 1.2 The report also sets out proposals for a Youth Takeover Day to take place during 2026.
- 1.3 The Youth Council remodel proposals link to Outcome 3 of the Corporate Plan: A better future for children and young people. We will put young people at the heart of decision-making through development of our youth participation and engagement arrangements.

### **2. Recommendations**

- 2.1 That Cabinet approves the Youth Council remodel proposals as below:
  - The Youth Council to move to a Cabinet system of operation and to meet with relevant Cabinet members and senior officers as appropriate
  - The Youth Council to present to Corporate Leadership Team biannually and to meet regularly with the Corporate Director for Families Children & Wellbeing.
  - The Youth Council to present an update of its priorities and work to Full Council on an annual basis
  - Officers to explore the Youth Council being located in council offices.

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

- 3.1 The Youth Council is formed of elected volunteer members from schools and colleges in Brighton and Hove. This is a two-year elected term for children and young people ages 11-19 (up to 25 with SEND).

- 3.2 The purpose of Youth Council is to amplify the voice of children and young people across the city and share this with decision makers to create change via a manifesto, campaigns, consultations and representation in UK Youth Parliament.
- 3.3 During a youth-led review in March 2025, young people identified priorities which included closer ties with decision makers, campaigning, council integration, training, and broader representation.
- 3.4 The review raised the following issues:

**How do we ensure Youth Council is front and centre without additional budget?**

**Proposals from youth council:**

- 10 annual consultations embedded in council strategy.
- Quarterly meetings with Director for Families, Children and Wellbeing.
- Biannual Corporate Leadership Team presentations.
- Annual Full Council presentation.
- Open invite to Councillors and senior officers to meet with youth council representatives.
- Co-location of an office space for the youth council in council offices.
- Support collaborative working across council and youth voice networks.

**How do we ensure we are capturing a wide range of voices including those from harder to reach communities?**

- Targeted consultations for young people in underrepresented groups.
- Citywide consultation with young people to broaden representation.
- Host listening events focused on diverse issues of young people.
- Provide youth council representatives with portfolio roles to elevate marginalised voices.
- Develop ambassador roles with focus on marginalised voices.

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

- 4.1 The Youth Council is committed to representing the voices of children and young people across the city. The proposals outlined in this report provide the opportunity for closer links with Cabinet Members and senior officers to be established, and for the Youth Council to have meaningful involvement in and influences over decisions that directly affect them.

**5. Community engagement and consultation**

- 5.1 The remodel proposals are based on findings from a youth-led review in March 2025. Young people identified their priorities which included closer ties with decision makers, campaigning, council integration, training, and broader representation. The Youth Council wish to adopt a structure that reflects the Cabinet model of Brighton and Hove City Council.

**6. Financial implications**

- 6.1 There are no significant financial implications arising from the recommendations of this report. However, there may be some additional

costs relating to the bi-annual listening event and funds will need to be identified to support this initiative. In addition, there are requirements for the use of council space and additional passes, although these will not need funding to be identified.

Name of finance officer consulted: David Ellis    Date consulted 17/12/2025:

## **7. Legal implications**

- 7.1 Youth Councils are voluntary advisory groups which assist Councils in meeting their statutory duties to involve young people in shaping services. There is no regulatory framework which governs how they should run. Councils are therefore able to define their procedures and practices.

Name of lawyer consulted: Serena Kynaston    Date consulted 18/12/2025:

## **8. Risk implications**

- 8.1 No risk associated with the proposed Youth Council model

## **9. Equalities implications**

- 9.1 This question has been fully considered in the proposed Youth Council model, ensuring a wide range of voices, including harder to reach communities, are captured through the proposals in the report.

## **10. Sustainability implications**

- 10.1 No impacts identified

## **11. Conclusion**

- 11.1 Based on the Youth Council review completed by young people it is proposed to remodel the youth council as outlined in the report to ensure a clear pathway between the voices of children and young people and council decision makers.
- 11.2 A Youth Takeover Day will be set up in 2026. This will support the Youth Council to feel more involved with the work of the council.

## **Supporting Documentation**

### **Appendices**

1. Youth Council Remodel Proposal slides



# Remodeling Proposal



**Brighton & Hove  
Youth Council**

By Young People for Young People



**Brighton & Hove  
City Council**

# Strategic Context

- Brighton & Hove City Council Plan 2023-27



- Outcome 3: Create more opportunities whereby the voices of all children, young people and families can be heard and can influence and improve the services that support them

- 5 Pillars: Ways of Working

- Pillar 4: Be diverse and inclusive
- Pillar 2: Be connected



- Rationale

- Youth Council is a youth led program establishing a pathway for the voice of young people in the city to be heard by decision makers on issues that impact them.
- Youth Council highlighted challenges with the current model including relationships and connection to decision makers leading to a review in spring 2025

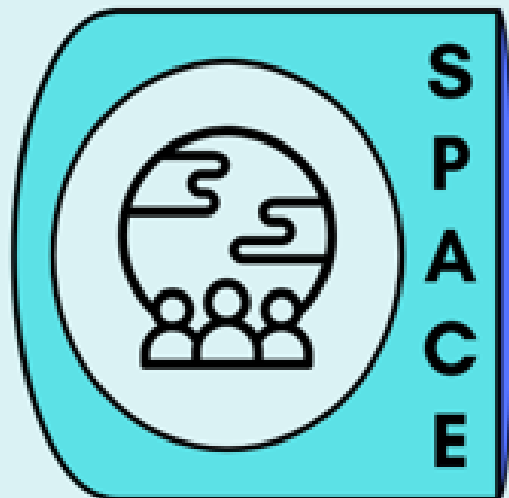


# CHALLENGES

## Youth Council

- No consistent relationship or connection to decision makers
- Involvement in decision-making processes at times felt performative
- Campaigns were a tool for acting on voice, but felt limited on their own
- Change in governance model altered the connection to decision-making
- Identity as a standalone group rather than part of the council
- Space to have a voice was there, but the acting on that voice and influence was not
- A suitable meeting space was sometimes difficult to find
- The frequency and sporadicity of meetings felt confusing and overwhelming
- Knowledge of how the council functions was lacking.

# Youth Council Proposed Model for Consideration



Youth Council HQ based alongside decision makers

ID badge and shared IT Access

Consistent Programme of Training, Listening Campaigns and Evaluating



Presentation to Corporate Leadership twice annually

Presentation of Youth Council Manifesto and Campaigns to Full Council Annually

Corporate Director for FCW to attend Youth Council

Inclusive Election Process across all schools and colleges

Additional spaces for underrepresented voices

Bi-ennial listening event for young people across the city

Training Programme



Election of Youth Council Portfolio Leads

Elected leads to meet with relevant cabinet leads and councillors  
8 hours of internal/external consultation annually.  
Agreed with young people



# RECOMMENDATIONS

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## Youth Council

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Following the Youth Council review, a request that the proposed new model is approved, including Councillor agreement to the following adjustments;

- Request for basic funds for a bi-annual listening event, to include young people from schools and colleges across the city.
- 15' Request for a commitment from Cabinet Members to meet with Youth Council portfolio leads on relevant issues
- Request for an office space for a Youth Council HQ (ideally located near Councillors)
- Request for ID badges for access and shared IT access
- Request for a Presentation of Youth Council Manifesto and Campaign at Full Council annually
- Request for a Presentation to the Corporate Leadership Team twice a year



# Brighton & Hove City Council

## Cabinet

## Agenda Item 103

**Subject:** More Recycling, Less Waste - A New Collection Model

**Date of meeting:** Thursday, 22 January 2026

**Report of:** Cabinet Member for Net Zero & Environmental Services

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

**Contact Officer:** Name: Rachael Joy- Interim Director of Environmental Services

Email: rachael.joy@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 Increasing our rates of recycling and reducing waste is a key part of our goal to deliver a clean and sustainable city to be proud of, a central ambition to our Council Plan 'A Better Brighton & Hove for All'. By promoting the responsible use of resources, minimising waste and providing a reliable refuse and recycling service we will continue to develop pride in our place and our commitment to a circular economy.
- 1.2 Since May 2023, there has been ongoing increased investment in waste and recycling services to ensure significant improvement in this essential service. This report outlines an ambitious programme to continue our service improvement and to work toward doubling our recycling rates over the next decade.

### 2. Recommendations

- 2.1 Cabinet agrees the actions set out in the report to explore and develop a proposal for a future model of delivery for waste collection services, in particular through modelling and independently assessing round structures.
- 2.2 Cabinet approves the use of a waste composition survey to assess how the current service is being used.

- 2.3 Cabinet approves the engagement with residents and staff as set out in the report to ensure a collaborative and evidence led approach to the redesign of the waste collection services.
- 2.4 Cabinet notes that a further report will be brought to Cabinet to assess the outcome of the waste composition survey, round analysis and engagement with residents and staff, and for a further decision to be made on the future model of the service based on this data.

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

- 3.1 Over the last 18 months significant progress has been made to improve the performance of the waste and recycling service and, in May 2025, alongside ongoing significant work to improve the workplace culture in the service, Cabinet approved a programme of investment to accelerate the pace of change, resolving historic issues of under-investment in fleet, introducing digital technology to improve historically unreliable systems, and continuing the work to embed culture change. Since then, the range of materials that can be recycled in our kerbside and communal collections has been expanded, and a separate food waste collection service has been successfully rolled out across most of the city.
- 3.2 The expansion of materials accepted in mixed recycling and the introduction of weekly food waste collections means that we are now seeing the volume of residual waste (refuse) fall. This reduction is expected to continue.
- 3.3 Alongside these new services, the performance of the collection service has improved so that in most weeks around 99% of the circa 194,000 (sometimes much higher) collections we make are achieved during the week. We continue the drive toward zero missed collections.
- 3.4 Digital transformation in the service has seen the introduction of in-cab technology, allowing far more efficient planning and management of rounds, greater transparency, and detailed real-time information available for customers on the website.
- 3.5 Alongside our local changes, Government has set a target for all authorities to ensure that 65% of waste is recycled by 2035 and also set clear rules around service delivery including weekly food waste collections, and making companies pay for the packaging they produce. In addition, the government are planning a Deposit Return Scheme which will give people money back when they return bottles and cans, and the introduction of stricter rules on landfill carbon emissions trading that will make throwing things away or sending waste to energy recovery facilities more expensive.
- 3.6 The council has progressed changes to recycling and introduction of food waste collections ahead of the statutory timeline and will continue to strive for improvements over and above those required statutorily.
- 3.7 Local Government Reorganisation (LGR) may result in boundary changes for Brighton & Hove. If this is the case, the work described in this report will

provide the basis for taking forward changes to the waste service over a revised geography.

- 3.8 Recycling rates in the city hover around 26%. This still leaves around 73% of the city's waste being sent for energy recovery, with less than 1% of material not suited to recycling or energy recovery going to landfill. The changes outlined in this report are aimed at significantly shifting the rate of recycling, whilst continuing with a very low rate of waste ever going to landfill.
- 3.9 Research from INCPEN (The Industry Council for Packaging and Environment) shows that residents recycle more when they
- are confident that recycled materials actually go for recycling
  - see neighbours like themselves recycling
  - receive regular information on recycling performance direct from their Council.
  - Opportunities to recycle are easy with most decisions about what to recycle being made in the kitchen rather than at the kerbside.
- 3.10 This report addresses all four of these factors working with residents, businesses and government to make possible a doubling of recycling rates over the next decade.
- 3.11 Brighton and Hove is an outlier in continuing weekly refuse collections. Currently, only 62 out of 317 English councils collect residual waste every week<sup>1</sup>. More than 80% of councils collect fortnightly or every 3 or 4 weeks.

### **Waste Composition Survey**

- 3.12 Our future waste collection model will be developed based on the improved data we now have available following our digital transformation, with expert analysis and engagement with residents and staff to establish the round structure that will work best for the city. We will apply the principles of our learning organisation as we learn from the past and apply those lessons to the future. The first step in this process will be an assessment of the current situation.
- 3.13 A waste composition survey is planned to provide accurate local data to tell us how residents are using the current services. For example, how much more could be diverted into food or recycling streams rather than going to energy recovery and, crucially, the extent of contamination leading to the rejection of recycling materials. The results of this survey will form the foundation for our planning and our communications plan with residents.

### **What we know about recycling levels already**

- 3.14 Additional recycling materials have been introduced to the kerbside dry recycling stream since 1 June 2025. We now collect plastic pots, tubs and trays (PTT) in addition to the existing recycling mix of paper, card, metal tins,

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<sup>1</sup> WRAP local authority portal

aerosols and can and separate glass. There is a drive to increase compliance with PTT recycling through an awareness campaign which has so far seen leaflets notifying residents of the inclusion of this material to over 70,000 households and to the whole city by the end of February.

- 3.15 In 2024/25 households residual waste was 580kg/hh. The last waste composition analysis carried out in 2022 showed 38% of residual waste was food waste. With food waste collections now in place, the waste movements will mean the residual waste has further reduced.
- 3.16 Our initial data from the current food waste collection in place for 72,000 households shows that over 600 tons has been collected so far. As household refuse is still collected weekly, some residents continue to dispose of recyclable items in the residual stream. The benchmarking data with CIPFA Nearest Neighbour local authorities with similar demographics, property types, and collection schemes, the projected annual food waste yield for Brighton & Hove was estimated at 5057 tons, or 0.74 kg per household per week on a weekly refuse collection. If refuse was on a fortnightly collection, it is projected there is potential to increase this by 50%.

### **Engagement with Residents**

- 3.17 As part of the consideration of the new collection model, focus groups with residents will take place to ensure that feedback informs our future service design, and our future collection model makes it as clear and easy to recycle as possible.

### **Reliable and Efficient Round Design**

- 3.18 Brighton's and Hove's waste collection routes were designed over a decade ago and no longer reflect current traffic patterns, housing growth, or service changes. By building on the insights from our new digital round management platform, Bartec's Collective, we can use advanced modelling to create smarter, more efficient routes. Once the modelling is complete, an independent expert will validate the new rounds, ensuring they meet best practice standards and deliver real-world improvements. Crucially, this process will draw on the local knowledge of our crews, who understand access challenges, seasonal variations, and community needs. As a learning organisation, we see this as an opportunity to combine technology, external expertise, resident experience and staff insight to improve reliability and efficiency. The result will be routes that reduce wasted mileage, cut fuel costs, and give residents greater confidence that collections will happen on time, every time. The outcome will also provide an assessment of the logical frequency of collections, and the viability of alternate weekly collections for residual waste, dependant on the assessment of increased recycling and the removal of food waste from our residual waste.

### **Alternative Weekly Collection**

- 3.19 All of the analysis of data, described above, is likely to lead to evidence of reductions in residual waste, and therefore supporting the potential



introduction of alternative weekly collection for residual waste. A study by the University of Southampton found that switching to alternate weekly collections increased recycling rates by up to 9% and reduced residual waste volumes by 13%<sup>2</sup>. This evidence has resulted in around 80% of councils already operating with fortnightly collection of refuse, with particular success in areas where there is also a food waste collection.

- 3.20 The global UK based charity organisation, Waste and Resources Action Programme (WRAP) carried out national analysis which shows that councils with alternate weekly collections achieve recycling rates 5–10 percentage points higher than those with weekly refuse collections<sup>3</sup>.
- 3.21 A Defra-funded Health Impact Assessment found no significant health risks associated with reduced collection frequencies, provided common-sense measures are taken<sup>4</sup>
- 3.22 Alternate weekly collection with other simpler recycling measures should see recycling levels increase to around 40%. Nationally, the Extended Producer Responsibility Scheme will contribute around 20%-25% to increased recycling and the deposit return scheme, when implemented a further 5-8%, opening the way for the city to achieve 65% recycling levels over the next decade.

### Environmental Services Culture Change – further developments

- 3.23 :The Council underwent a Local Government Association sponsored peer review of all of its service between 1st and 4th April 2025. The review noted the positive direction in Environmental Services. The report stated that "significant work is underway within environmental services, early results show that transformation efforts are beginning to yield improvements in both the culture at the depot and in service delivery" The report noted the need for continued momentum, recognising the progress, the peer reviewers emphasised the importance of maintaining "ongoing focus on strengthening industrial relations, improving workforce engagement, and embedding new ways of working"
- 3.24 In May 2025, Cabinet was updated on progress about the Culture Change programme which was built on the principles of our learning organisation.



Be connected



Be confident



Be innovative  
and creative



Be diverse  
and inclusive



Be healthy and  
psychologically safe

- 3.25 **Being Connected** – In recent months the service has become better connected replacing its rudimentary paper-based systems with the latest digital platform shared by crews, back office staff and the customer contact

<sup>2</sup> [Fortnightly collections | Engineering | University of Southampton](#)

<sup>3</sup> [Technical report templates](#)

<sup>4</sup> [Microsoft Word - HIA of AWC Q and A v5 final.doc](#)

team. This has enabled a more effective deployment of resources and provides a clear picture of day-to-day performance.

- 3.26 **Being Confident-** the service has become increasingly confident in delivering multiple change projects at once. On going learning from each phase of a project is built into weekly project board meetings ensuring that feedback is built into successive stages of the project. This has been most noticeable on the roll out of Food Waste Collections with each phase being significantly more complex and larger than earlier phases.
- 3.27 **Being Innovative and Creative-** the service used the opportunities presented by digitalization to introduce, as far as we know, the UK's first real time information service for residents. Prior to the digitalization there was no way of knowing how well the service was performing. Since the summer, collection performance has steadily improved and now regularly achieves 99% collection levels each week.
- 3.28 **Being Diverse and Inclusive-** equality and diversity issues are picked up in the weekly staff newsletter and a programme of training has commenced for all staff. Digital inclusion has been progressed through the provision of increased communal IT equipment at the Hollingdean site enabling staff to keep up to date and learning to take place, and a programme to provide access to digital council systems on personal phones is underway. In addition, managers have been trained in agile ways of working.
- 3.29 **Being Healthy and Psychologically Safe-** an anonymous reporting tool has been introduced to enable people to report concerns independently of the service. When staff have concerns about their role, there is an increasing emphasis and expectation that informal processes such as mediation will be used to bring people only using formal processes as a last resort where the nature of the concern justifies this.
- 3.30 As the culture change continues, further improvements are planned to ensure the service is resident focused using data and digital systems effectively and listening to and working with residents to co-create solutions where issues exist.

### **Weekly Service Performance Reporting**

- 3.31 the service is in the final stages of developing a weekly public performance dashboard demonstrating a commitment to full transparency about how the service is doing. This will provide information for each waste stream.

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

- 4.1 This report recommends exploration of options to secure an efficient and effective model of waste collection based on a target operating model that increases recycling and reduces residual waste while maximising efficiency in the service.

- 4.2 The alternative option is 'do nothing', which would see the continuation of significantly reduced residual waste stream, collected on the same operational model at higher cost with lower recycling levels and cannot be recommended.
- 4.3 The further cabinet report, in the early summer 2026, will outline in detail all the options based on the evidence collected in the waste review process outlined in this report.

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

- 5.1 Effective community engagement is central to achieving high participation, supporting behaviour change, and ensuring the success of these service changes.
- 5.2 Early independent engagement will take place through focus groups to gather opinions from residents in kerbside refuse collection areas regarding their views on recycling can be improved through a new collection model.

The results and analysis will be reported to cabinet alongside the service options modelling.

## **6. Financial implications**

- 6.1 If approved the report recommendations will result in some minor spend commitments for the Council. Estimated revenue costs are associated with the exploration of the new collection model and the commissioning of the waste composition survey. As part of the introduction of Food Waste across the city £0.512m has been identified as one off project funding to support these costs and is included in the 2025/26 budget position. The current year forecast includes a commitment to fully spend this budget, as such consideration at year end will be given to the carry forward of the unspent project budget into 2026/27 to ensure that the results of the review and survey can be implemented.
- 6.2 It is expected that a long-term revenue saving can be made in relation to a round redesign and review of the delivery model. High level estimates based on a refresh of round design to increase efficiency will be included as part of the 2026/27 budget report to Cabinet and Full Council in February. Assumptions have been made related to the very historic round design currently in place, and will be further assessed as a result of the detailed analysis that is described in 3.12 to 3.22 above.
- 6.3 Capital investment relates to the costs incurred regarding glass collection. The estimated investment totals £0.076m and can be met from existing capital resources.
- 6.4 The report is not seeking any new budget either revenue or capital, however it is possible further investment will be required. This will need to be approved by cabinet as a full business case outlining the one-off investment

and on-going revenue implications. The financial implications are likely to exceed £1m as a result of the work undertaken.

Name of finance officer consulted: Craig Garoghan      Date consulted: 09/01/26

## **7. Legal implications**

- 7.1 Procurement of consultancy services will be undertaken in accordance with the requirements of the Council's Contract Standing Orders. No decisions are sought in this report regarding a proposed revised model of service and therefore there are no further legal implications to address at this stage.

Name of lawyer consulted: Elizabeth Culbert Date consulted 07.01.26

## **8. Risk implications**

- 8.1 Risk will be managed through the project governance process with an officer Project Board meeting weekly and reviewing risk and issues as a part of a structured project process. Significant risk is highlighted to the lead Cabinet Member through a regular progress reporting process. This report is seeking permission to review the current model of collection, and undertake work to consider the optimum model of collection in the future to reduce waste, increase recycling and improve efficiency and reliability. Risks related to the future model recommended will be covered in the cabinet report when the outcome of this work is presented.

## **9. Equalities implications**

- 9.1 The final proposals will be accompanied by a full impact assessment, reported to Cabinet alongside a future report.

## **10. Sustainability implications**

- 10.1 The proposal supports net zero objectives through a sustained increase in recycling and reduction in collection vehicle journeys.

## **11. Health and Wellbeing Implications:**

- 11.1 The cost and consequences of not addressing climate change fall unequally on marginalized and vulnerable groups.

## **Other Implications**

## **12. Procurement implications**

- 12.1 An appropriate procurement process will take place for suitable round design consultancy and a waste composition survey.

## **13. Crime & disorder implications:**

None

#### **14. Conclusion**

- 14.1 Accepting the recommendations in this report will lead to a programme of work to develop a possible new collection model capable of increasing recycling, reducing waste delivered by a more efficient, effective and reliable service.. A formal decision on whether or not to proceed with a new collection model will be considered at a future Cabinet meeting.



# Brighton & Hove City Council

## Cabinet

## Agenda Item 104

**Subject:** Mid-year Council Plan performance update 2025/26

**Date of meeting:** 22 January 2026

**Report of:** Cabinet Member Customer Service and public realm

**Contact Officer:** Name: Rima Desai  
Email: [rima.desai@brighton-hove.gov.uk](mailto:rima.desai@brighton-hove.gov.uk)  
Name: Luke Hamblin  
Email: [luke.hamblin@brighton-hove.gov.uk](mailto:luke.hamblin@brighton-hove.gov.uk)

**Ward(s) affected:** All

### For general release

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

- 1.1 Our vision is to deliver a better Brighton & Hove for all where everyone can thrive as part of a healthy, fair and inclusive City and this report provides information on the council's progress towards this vision.
- 1.2 Our vision is set out in our Council Plan under 4 outcomes:
  - A city to be proud of
  - A fair and inclusive city
  - A healthy city that helps people to thrive
  - A responsive and learning council with well-run services
- 1.3 The information in the report outlines the progress made against the delivery of each of these outcomes and highlights what we have achieved and delivery areas of focus.
- 1.4 The report is a key part of council's Performance Management Framework (PMF) which underpins our statutory duty towards continuous improvement.
- 1.5 The PMF directly supports the Council Plan Outcome 4: A responsive and learning council with well-run services – Good governance and financial resilience and is aligned to our Learning Framework.
- 1.6 The report also includes our Risk Management Framework and our current Strategic Risks which may affect the delivery of the Council Plan. Cabinet is responsible for ensuring that the council has a robust risk management framework in place. Audit, Standards and General Purposes Committee provide assurance on the adequacy and effectiveness of the risk management framework.

#### 2. Recommendations

- 2.1 Cabinet notes the progress made in relation to delivering the Council Plan in 2025/26 as outlined in section 3 and with full details in appendix 1.
- 2.2 Cabinet approves the Risk Management Framework (appendix 2) and notes current strategic risks as detailed in appendix 1.

### **3. Mid-year performance report for 2025/26**

- 3.1 The overarching document which sets out the outcomes which the council aims to deliver is [Brighton & Hove City Council's Council Plan 2023 - 2027](#).
- 3.2 Progress towards delivery of the Council Plan outcomes is evidenced by the Corporate KPI results, delivery of the [Corporate Leadership Plan](#) (which is linked to the Council Plan commitments) and updates in relation to other elements of our Performance Management Framework.
- 3.3 Following a Corporate Peer Challenge in April 2025, the council received the following feedback from the review team:

The council has a comprehensive and structured Performance Management Framework (PMF) in place, which plays a critical role in supporting the delivery of its Council Plan outcomes. The PMF enables the organisation to monitor, assess, and improve performance at the individual, service, and organisational levels.

As a Best Value Authority, the council recognises its duty to secure continuous improvement in the exercise of its functions, with a clear focus on economy, efficiency and effectiveness. The PMF is designed around eight interconnected components that collectively drive ongoing improvement. These elements ensure a holistic understanding of performance across the council. Most services contribute to multiple aspects of the framework, reinforcing a culture of shared responsibility for improvement.

Delivery against the Council Plan is tracked through a combination of corporate key performance indicators (KPIs), progress updates on the Corporate Leadership Plan, and performance reporting aligned to each of the PMF's elements. The Corporate Leadership Plan itself translates the strategic ambitions of the Council Plan into priority activities, providing a mechanism to ensure accountability, transparency, and demonstrable impact.

- 3.4 This report includes progress made between April and September 2025 against the eight key recommendations from the Corporate Peer Challenge. A full report on progress made will be developed in Quarter 3, with input from lead officers, to share with the Corporate Peer Challenge progress review team. Detailed updates against each recommendation are provided in Appendix 1.

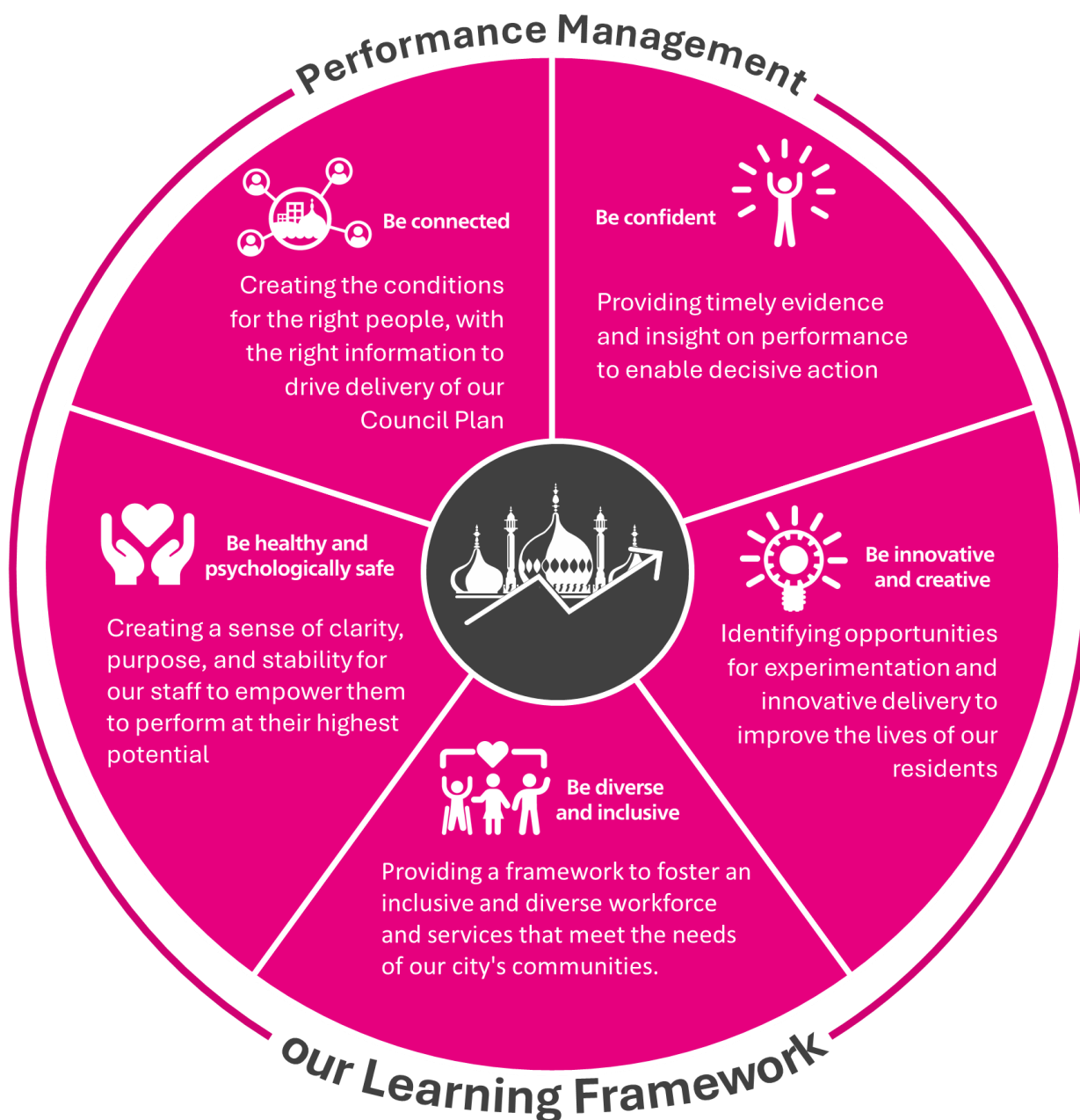


- 3.5 The information in this report outlines progress made against the delivery of the Council Plan between April and September 2025, highlighting our achievements and delivery areas of focus in achieving a better Brighton & Hove for all.

The information outlined in this report is in the context of unprecedented financial challenges for the council, we are currently projecting an overspend of around £7.8 million in 2025/26 (source: TBM7), mainly due to rising temporary accommodation costs and increasing demand for children's and adult social care placements. 36% of our targeted savings are at risk of not being delivered (£5.8 million at risk).

In addition to the in-year pressures, there is a projected £25 million shortfall in 2026/27, based on funding assumptions and net expenditure projections and over £86 million for the period of 2026/27 to 2029/30 (source: General Fund Draft Budget & Resource Update - 2026-27 to 2029-30).

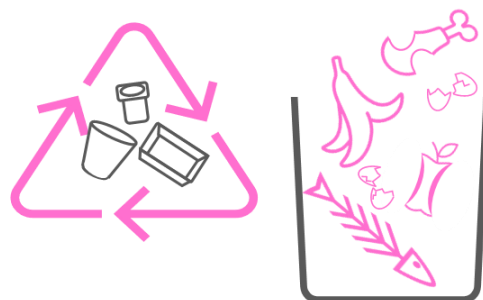
Our Performance Management Framework is aligned to our Learning Framework



## What we've achieved

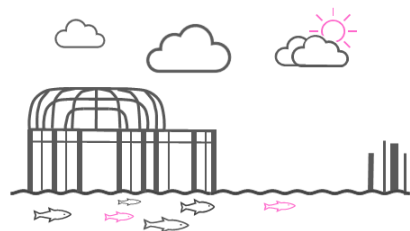


Gained global recognition with the redesignation and expansion of The Living Coast UNESCO Biosphere, bringing our communities closer to nature and a more sustainable future.



Expanded our recycling collections to include plastic pots, tubs and trays and rolled out weekly food waste collections to 11,000 households in the east of the city

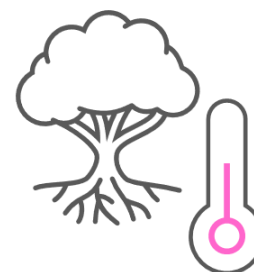
Awarded Gold standard<sup>1</sup> for planning performance, placing Brighton & Hove City Council within the top 31 authorities in the country



Established the Seafront Development Board and Brighton & Hove Growth Board to drive the development, regeneration and economic growth across the city



503 electric vehicle charging points installed across the city, with a further 6,000 planned over the next 10 years



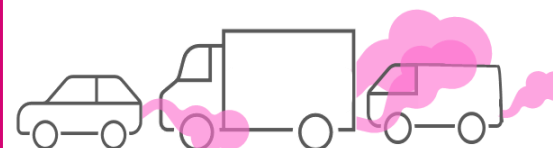
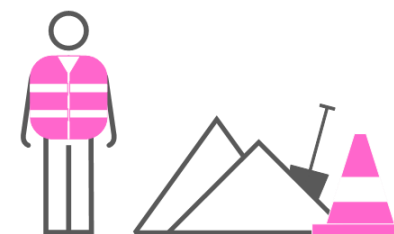
Preserving the future of our trees by limiting the spread of disease and planting 190 trees in streets and parks, plus 1,250 saplings in woodlands, to ensure a healthy future.

We have proactively treated 14km of roads and pavements and completed over 2,800 safety repairs to keep our city's infrastructure safe and accessible. (Strategic Risk)

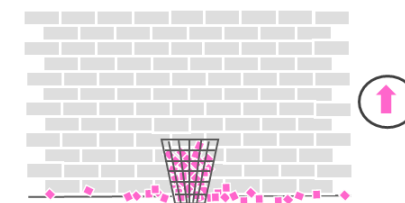
## Delivery areas of focus



Increase our recycling rate from 26% to 33.5% and reduce residual household waste from 571kg to below 507kg (target values)



Delivering our fleet replacement plan for more sustainable service delivery



6.06% of streets inspected were found to have widespread or heavy levels of litter (target 4.9%)

The council continues to deliver impressive achievements across its strategic priorities, with some notable progress delivering an accessible, sustainable and clean city, and investing in our city. The city's tourism sector has thrived, highlighted by the successful hosting of the 2025 Women's Rugby World Cup and the opening of a new Visitor Information Hub at the i360 on September 27th, which supports both visitors and local businesses. VisitBrighton.com generated 774,466 page views and engaged 168,000 followers across social media, while nine major conferences and events were secured, projected to deliver £4.2 million in economic benefit. The Brighton Centre welcomed 54,790 visitors over 48 booked days, generating £18 million for the local economy, with £208,230 worth of accommodation booked for delegates. The city also received high-profile media coverage, including features in Time Out Magazine and Condé Nast Traveller, further boosting its reputation as a top destination.

The Brighton & Hove Growth Board, created with the Department for Business & Trade, brings together local businesses to drive economic growth and support innovation. The city's creative sector benefited from £1,032,505 in public art projects, support for 58 creative organisations, and the securing of 475 sqm of creative workspace. Cultural sites attracted 212,953 visitors this quarter, with 3,140 school children engaged in formal learning, and the Adult Skills Hub enrolled 170 learners in September, including 101 ESOL students, supporting lifelong learning and employment opportunities.

Seafront restoration is ongoing, with the refurbishment of the cucumber benches on Hove Promenade, working with residents engaged in the Community Payback Scheme to sand and redecorate these iconic seafront assets. Restoration of the seafront lanterns has also begun, enhancing the area's appeal and safety. The seafront property portfolio remains fully occupied, reflecting strong demand and a thriving local business environment, while new beach huts and a sauna opportunity are being developed. The city's commitment to the armed forces is recognised by the Armed Forces Covenant ERS Gold Award, reflecting ongoing support for personnel, veterans, and their families.

Developing a circular economy, making it easier to recycle or re-use resources and reducing waste, is key to creating an accessible, clean and sustainable city. The council is investing £1.2 million in new weekly food waste service and has expanded recycling collections to include plastic pots, tubs, trays, cartons, and Waste Electrical & Electronic Equipment (WEEE). The first phase of food waste collections began in June 2025, and with the continued expansion of other recycling materials, the amount of residual waste collected is expected to fall. Other infrastructure



improvements include tackling weed growth to keep roads and pathways safe and accessible, and announcing plans to install a further 6,000 new EV chargers over the next decade, supporting the city's transition to sustainable transport. The summer 2025 Park & Ride pilot was also completed, and a public consultation on the future shape of transport in the city launched, to inform 'Our City Transport Plan 2035'.

The Culture Change Programme in Environmental Services has delivered substantial improvements, with key achievements including stabilising leadership, and empowering managers to address operational challenges proactively, whilst leadership and manager training and an expanded wellbeing support have fostered a stronger, more engaged workforce.

Guided by the Council's learning framework, the programme has significantly enhanced psychological safety, inclusivity, and staff wellbeing. Constructive engagement with unions and a focus on mental health and positive leadership behaviours have helped embed these values into daily practice, laying the foundation for continuous cultural improvement and ensuring all staff feel valued and supported.

Looking ahead, the Culture Change Programme will progressively expand to place greater emphasis on meeting the needs of residents and businesses. This future direction aims to align operational improvements and cultural transformation with the needs of our community, ensuring services are responsive, inclusive, and reflective of the priorities of those living and working in Brighton.

Environmental initiatives progressed, such as biodiversity pilot sites, a solar farm feasibility study, and partnerships for Net Zero, although grant funding remains a challenge. Parks and green spaces saw elm tree inoculation, play area refurbishments, and a Green Flag award for Stanmer Park, with five new areas identified for rewilding. Major regeneration projects like King Alfred, Madeira Terrace, and Black Rock are advancing, ensuring Brighton & Hove remains a vibrant, attractive, and accessible destination for residents and visitors alike.



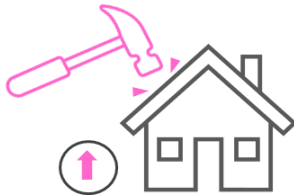
What we've achieved



5,645 out of 5,671 (98.74%) emergency repairs were completed within 24 hours of being reported (target 99%)

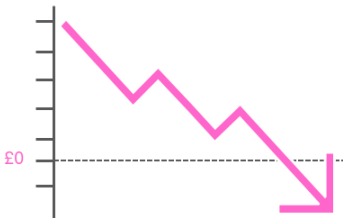


Supported 190 welfare cases generating over £1,450,000 in monetary outcome direct to residents



Continue improvement in the number of routine housing repairs completed on time from 58.6% to 70% (target 70%)  
New jobs raised since April 25 are at 74%

Delivery areas of focus



Ensuring the ongoing financial sustainability of the Housing Revenue Account

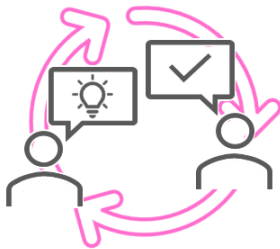
33 Projected to deliver 144 additional affordable homes (new build, acquisitions & conversions) in 2025/26 (target 110)



Increase the number of homelessness cases presenting during the prevention duty stage from 35.08% to 45% (target value)



59.94% [14% above benchmark] of homelessness prevention cases have been closed with a successful prevention outcome, supporting residents into settled accommodation



Working with our tenants by co-producing actions for an improvement plan to become a Great Landlord.



A continuing increase in the number of households in temporary accommodation (2,125 in September 2025)



Increasing the % of rent collected from current tenants of council homes from 92.8% to 95.9% (target value)



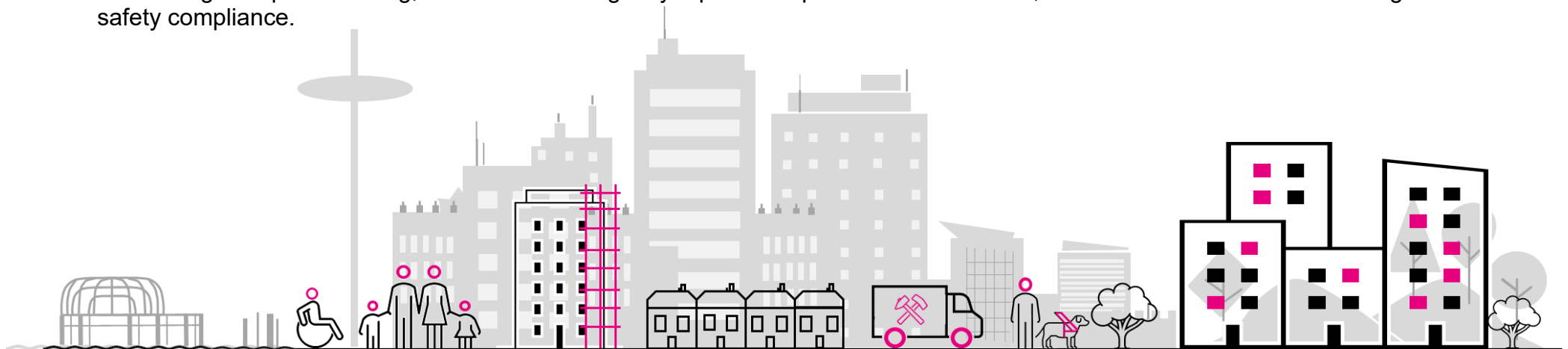
The council has made substantial progress towards the goal of being a fair and inclusive city, with a strong focus on community engagement, support for vulnerable groups, and embedding equality in both service delivery and internal operations.

Strategic partnerships with organisations such as the Trust for Developing Communities and Brighton & Hove Citizens Advice are on track, with half-year reviews scheduled, and new grant agreements set up through the Community Catalyst Fund for 2025–2027. The city is also preparing a formal application for City of Sanctuary accreditation, with a costed Sanctuary Action Plan being finalised. Since 2021, 47 Afghan households have been resettled in the city, and Brighton & Hove continues to participate in national schemes supporting people fleeing violence and persecution, including the Homes for Ukraine and Hong Kong Welcome Programmes. The council is also piloting new accommodation models for asylum seekers and actively monitors their welfare.

The council is on track to exceed its housing delivery targets, with 47 homes completed between April and September 2025 and a projected total of 144 homes by March 2026. These include both new builds and buy-back acquisitions, with a longer-term pipeline of over 560 homes and a commitment to deliver at least 2,000 affordable homes by 2029.

Focus remains on improving the standards of private rented property across the city with 2,244 Houses in Multiple Occupation (HMOs) and 1,117 other privately rented homes licensed between April and September 2025. In addition to this, the council continues to provide a responsive service to residents experiencing disrepair in their private rented property, responding to 215 requests for assistance with 70 of those cases where the home was improved due to the council's intervention.

Efforts to address under-occupation in social housing are underway, with a comprehensive strategy and resident engagement milestones set through 2027. The Housing First contract has been extended to ensure continuity of support for individuals with complex needs, and the recommissioning of Street Outreach services is in progress. The council has also made significant progress in reducing its repairs backlog, with 99% of emergency repairs completed within 24 hours, and continues to invest in building and fire safety compliance.

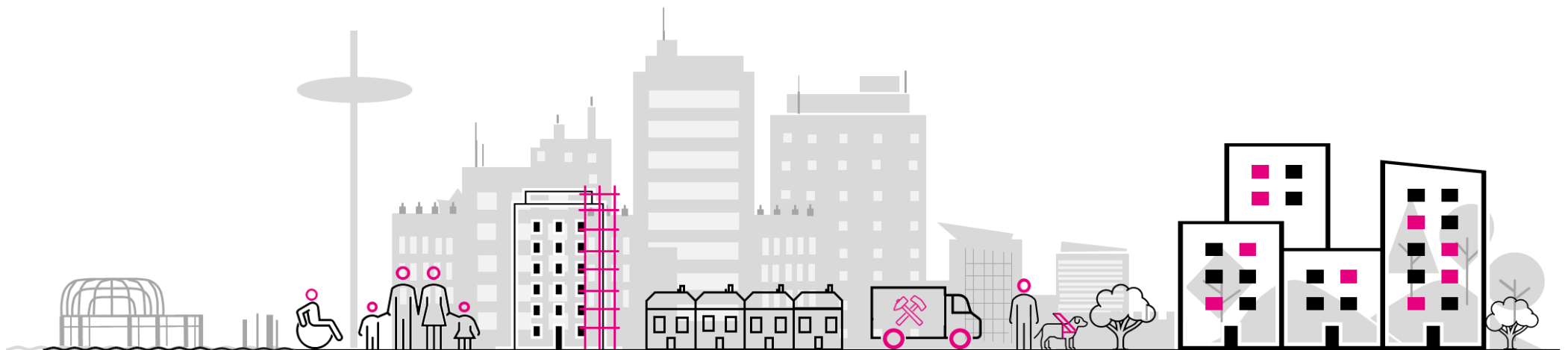


The council has made strong progress in housing safety and compliance since the C3 rating from the Regulator for Social Housing in August 2024, moving from recovery to sustained improvement. Key safety actions have been addressed, leadership and governance reinforced, and data reliability enhanced, restoring confidence in council homes. These improvements are now embedded in daily operations, with residents seeing clearer communication, quicker safety responses, and more visible safety works. Oversight of risks and governance has also been strengthened to maintain ongoing progress and resilience.

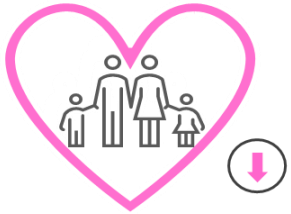
Internally, Brighton & Hove City Council is advancing its Fair and Inclusive Action Plan, with regular staff network meetings, leadership engagement, and targeted talent programmes for underrepresented groups. The workforce profile for Black and Minority Ethnic (BME) staff has reached 12.4%, surpassing the target of 12.1%, and representation in senior roles (M8 and above) is now at 11.7%.

The council processed 1,500 applications to the Local Discretionary Social Fund between April and August 2025, distributing £215,784, while the Welfare Rights and Benefit Cap Support Teams secured over £768,000 for clients in quarter 2 alone. Service delivery remains strong, with 97% of food hygiene inspections, 99% of noise complaints, and 100% of licensing applications processed on time. Public consultations and digital engagement projects ensure that resident voices continue to shape future strategies and improvements, reinforcing the city's commitment to fairness, inclusion, and responsive governance.

The council continues to look at all options to increase affordable housing supply using a blended mix of new build, conversions and acquisitions to maximise our opportunities. This year we are now anticipating completing 100 'buy backs' our largest projected annual delivery since the scheme started which has meant we are on track to exceed our supply target by 24%. Importantly we are delivering homes to meet a range of needs in our city including the delivery of permanent homes, temporary accommodation and supported housing for residents with physical disabilities and/or acquired brain injuries. We are exploring opportunities to minimise our use of spot purchase for Temporary Accommodation as a priority action and with a longer term aim to have an alternative model of delivery that maximises prevention and increases move-on for families to more stable longer term accommodation.



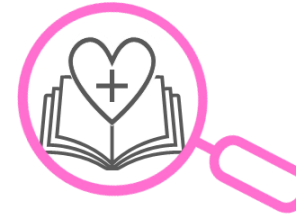
## What we've achieved



90.9% of Strengthening Family Assessments completed in 45 days, ensuring timely support is initiated to meet family needs [6.4% above national average]

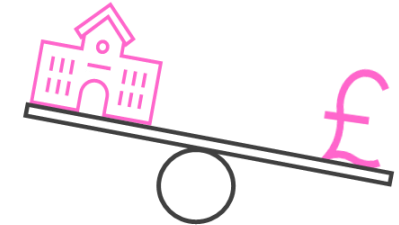


71% of all adults in receipt of a long-term service are supported to remain at home rather than in residential care



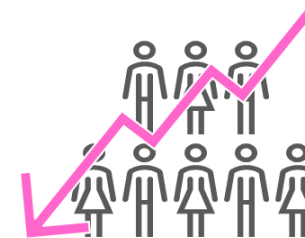
Rising demand and complexity in Education, Health & Care needs assessments and children's services

## Delivery areas of focus



Falling numbers of school aged children present significant challenges in school placements and balancing school budgets

3 Launched a city-wide strategy to reduce drug and alcohol harms, improve health equity, and build stronger communities through prevention, treatment, and recovery.



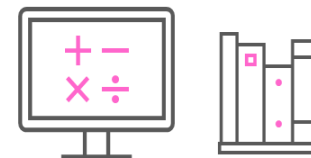
Reducing the number of admissions into residential care of younger adults, to enable more people to live independently



Launched the Schools Strategic Finance Working Group in collaboration with Headteachers across the city to address budget deficits



Delivered over 3,000 sessions, supporting 981 children, young people and families with emotional and mental health needs to keep them safe and well



Supporting children at risk of disadvantage through their education to achieve better outcomes



Managing risk for service users on waiting lists (including reviews) for Adult Social Care

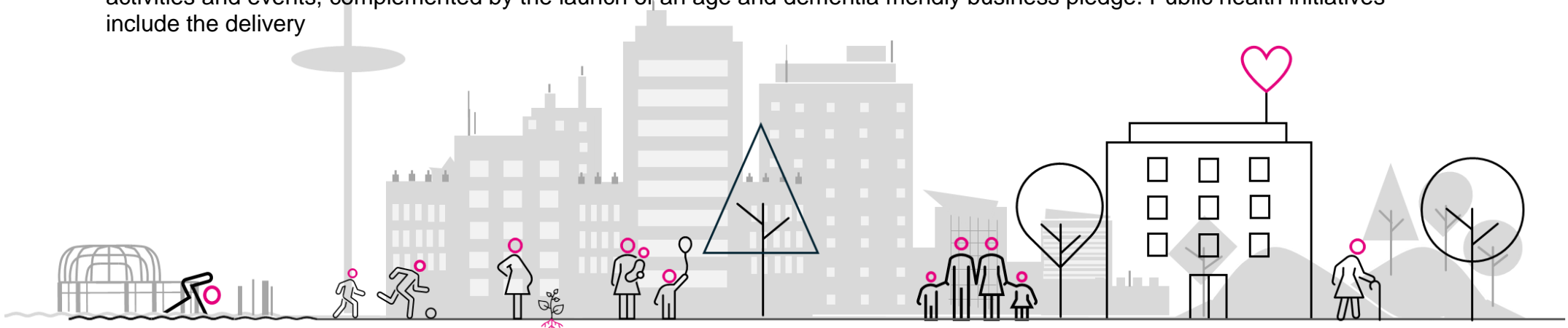


Brighton & Hove City Council continues to make notable progress in promoting health and wellbeing across all ages. Youth services have been strengthened, with the extension of commissioned provider contracts for a further two years, the successful launch of the Brighton Youth Centre in October 2025, and the anticipated opening of the Knoll Park Youth Centre. The city's selection as an early adopter for Young Futures Hubs, set for implementation in 2026, further demonstrates its commitment to supporting young people. In the last quarter alone, 1,078 sessions were delivered supporting 435 children, young people, and families, by our Mental Health Support Team and School Wellbeing Service, with only three onward referrals to specialist mental health services, meeting our performance targets.

The council's Living Well programmes have also delivered positive outcomes. The "Let's Get Moving" initiative continues to encourage physical activity, while the Gloji weight management service has exceeded targets, with 58% of clients achieving at least 3% weight loss and 42% achieving 5%. Smoking prevalence is on track to reach the 2025/26 target of 13.4%, supported by a newly established in-house stop smoking service. In May 2025, drug and alcohol services engaged 2,770 adults in treatment, and a new adult mental health support service, UOK Brighton and Hove is currently being mobilised. The city's health visiting service has performed above both regional and national benchmarks for all five Healthy Child Programme indicators, and 81% of young people exiting substance use treatment had planned exits, closely matching the national figure of 85%.

Innovation in adult social care is being embraced through pilots such as “Magic Notes” and the use of AI tools to enhance assessment accuracy and efficiency. Progress continues on the Adult Social Care Improvement Plan, which includes initiatives to address key performance areas in Waiting List Management, Annual Reviews and Residential Admissions. We have invested in a new dedicated reviews team, with our current performance at 41% of annual reviews completed on time, historically this has been below 30%. The target for 2026/27 will be to have completed 55% and therefore in line with our statistical neighbours.

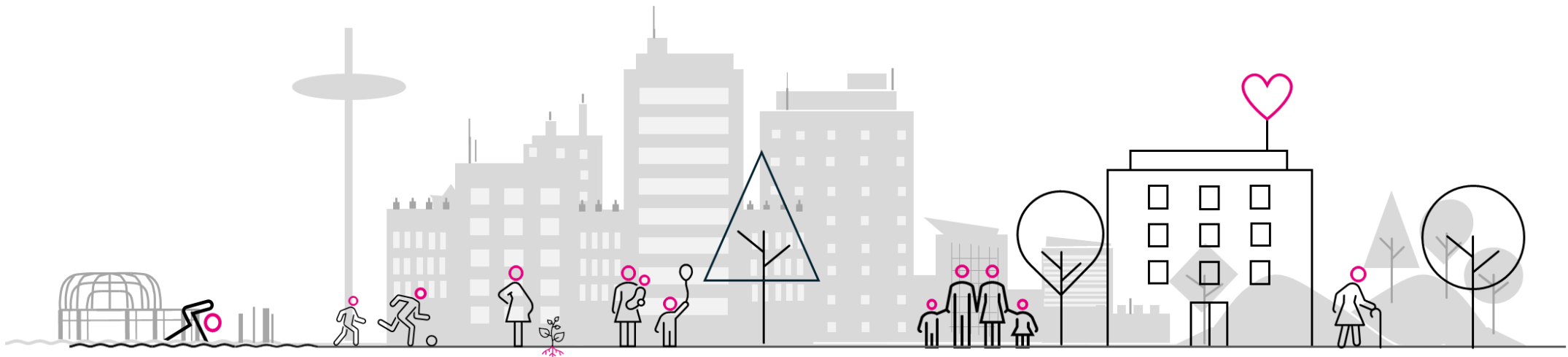
Integrated care has been strengthened with the rollout of neighbourhood Integrated Community Teams and the establishment of the Homeless & Multiple Compound Needs Programme. The recent Ageing Well festival in autumn 2025 featured more than 120 activities and events, complemented by the launch of an age and dementia friendly business pledge. Public health initiatives include the delivery



of falls prevention guidance and collaboration on a Sussex-wide falls workshop.

Children's services have benefited from transformation projects such as Mockingbird, Reunification, and Families First, with robust social work performance maintained throughout. The council is proactively addressing school sustainability, reviewing pupil numbers and supporting schools in financial management. Continued investment in inclusive educational facilities is evident through SEND service improvement works and the successful completion of the school summer programme. The SEND Strategy is advancing, with new inclusive intervention spaces and specialist teams now supporting several schools.

Further achievements include enhanced Home to School Transport arrangements, effective health protection systems, including pandemic planning and TB screening for the homeless and support for economic activity through the Get Sussex Working Plan. Collectively, these efforts underscore the council's dedication to fostering health, wellbeing, and opportunity for all residents, ensuring Brighton & Hove remains a healthy city where people can genuinely thrive.



## What we've achieved



Delivered 9 technology pilots to drive service efficiencies and savings across the council



Transformation & Innovation Portfolio of strategic programmes established to support delivery of the Council Plan, MTFS and operationalising the Learning Framework



Increased representation in our workforce profile across the council  
BME 11.9% to 12.4% [City 12.1%]  
Disability 9.9% to 10.2% [City 11.7%]  
LGBT 15.7% to 16% [City 12.2%]



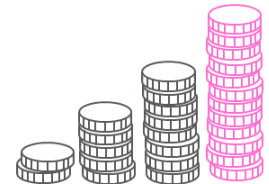
Submitted our proposals for Local Government Reorganisation in September 2025 and received Government approval for the creation of Sussex & Brighton Combined County Authority



Launched our new Health, Safety & Wellbeing policy and governance framework

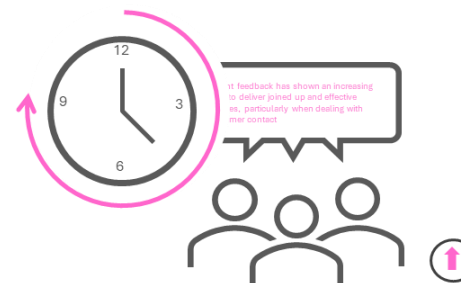


36% of the savings package is at risk with a projected overspend of around £7.8 million in 2025/26

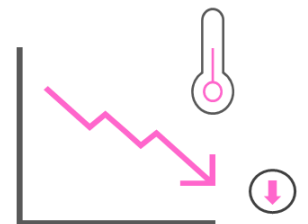


The Council's reserves position has moved from less than £7m at the beginning of 24/25 to £9m but is still lower than it should be

Delivering the Transformation & Innovation Portfolio of strategic programmes (including Asset Strategy, Contract Management, Commercialisation and Organisational change)



69% of complaints responded to in timescales (this is in the context of a projected 30% increase in complaints received)



Reducing the average number of working days lost to sickness from 10.26 to under 10 (target value)

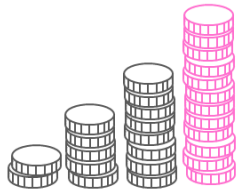
Our financial position is the biggest challenge for the council. The primary issues stem from surging demand for temporary and emergency accommodation due to the housing crisis, as well as increased demand for adult and children's services. Although we have seen small increases in our reserves position, it is still lower than required to have the flexibility to overspend this year. With 28% of our savings at risk, we are implementing additional controls and financial recovery plans to reduce the budget gap this year.

In addition to managing current pressures, we must focus on building long-term financial sustainability and transforming the council to ensure medium-term viability. This is in the context of preparing for Local Government Reorganisation and Devolution for the new Sussex and Brighton Mayoral County Combined Authority. We have agreed our Transformation and Innovation Portfolio of strategic programmes, which includes transforming our digital capabilities by integrating AI and automation to boost productivity and move away from manual processes towards cost-effective digitalisation, as well as reviewing our capital assets and office spaces to ensure maximum cost-effectiveness in how and where we work. We continue to explore innovative ways to address rising demand in adult social care, children's services and temporary accommodation alongside implementing robust commissioning and procurement arrangements.

We continue to embed our learning organisation framework to foster a culture that is connected, confident, creative, innovative, diverse, inclusive, healthy, and psychologically safe. We have seen increased representation in our workforce profile, and we are working to improve wellbeing, reducing sickness rates, through our refreshed health, safety and wellbeing policy and associated targeted support.

Our customers remain at the heart of the council, so within the challenging context we find ourselves, we strive to improve our services to meet the needs of our communities and deliver a better Brighton and Hove for all.





## Financial Strategy and Resilience

The council is implementing a Medium Term Financial Strategy and Transformation & Innovation portfolio, with Cabinet and CLT holding several workshops. A first draft of savings proposals was shared as part of the December budget report, showing progress despite financial challenges.



## Cultural Transformation in Environmental Services

The Culture Change Programme has enhanced leadership, digital access, and staff wellbeing, driving psychological safety, inclusivity, and continuous improvement across Environmental Services.



## Becoming a Learning Organisation

Progress has been made in operationalising our Learning Framework, with ongoing development of Ideas & Learning Labs, and a refreshed performance management, values and behaviour framework being prepared for further discussion.



## Mitigating Homelessness Pressures

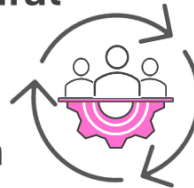
The Under Occupation Group has been re-established to strategically address under-occupation in social housing, and the council's Homelessness and Rough Sleeping Strategy for 2025–2030 is on track, with broad consultation underway and key milestones set for the coming years.

## Shared Vision for Devolution and Local Government Reorganisation



A Devolution Programme Board is in place. The council has published a Cabinet report advancing the creation of a Mayoral County Combined Authority for Sussex and Brighton, with formal partnerships and leadership established. A proposal for LGR has been submitted.

## Driving Cultural Change and Learning Organisation



Bespoke development interventions for directors and leadership teams are underway, and the Culture Shift Mission Group has been designed to operationalise the learning framework, with a focus on staff engagement and organisational development.

## Council Housing Service Improvement



Significant progress has been made in reducing the backlog of routine repairs for council housing, with the service meeting its target of 99% of emergency repairs completed within 24 hours and customer satisfaction targets being achieved.

## Governance Model Transition and Scrutiny



The transition to the leader and cabinet model has been well managed, with the full Council approving changes to enhance scrutiny through additional Task & Finish Groups and a new Scrutiny report planner, ensuring more inclusive and effective governance.

## 4. Strategic Risks

4.1. The council operates a Risk Management Framework, detailed in appendix 2, which outlines the process and controls in place to manage risks that may impact the council's ability to deliver the Council Plan. This framework is amended to take into account feedback received from the Corporate Peer Challenge team. The Strategic Risk Register is detailed in appendix 1.

4.2. Our Risk Management approach was audited in 2024/25 and received 'reasonable assurance'. The purpose of the audit was to provide assurance that controls are in place to meet the following objectives:

- The Council has in place a robust Risk Management Framework which facilitates effective identification, assessment and response (where appropriate) to risks.
- Management ensure that risks are subject to appropriate identification, assessment and response (where appropriate) in accordance with the organisation's Risk Management Framework.
- Effective mitigations are in place to minimise the impact and / or likelihood of occurrence of the risks identified.
- Robust reporting arrangements are in place to allow for effective senior officer and Member oversight

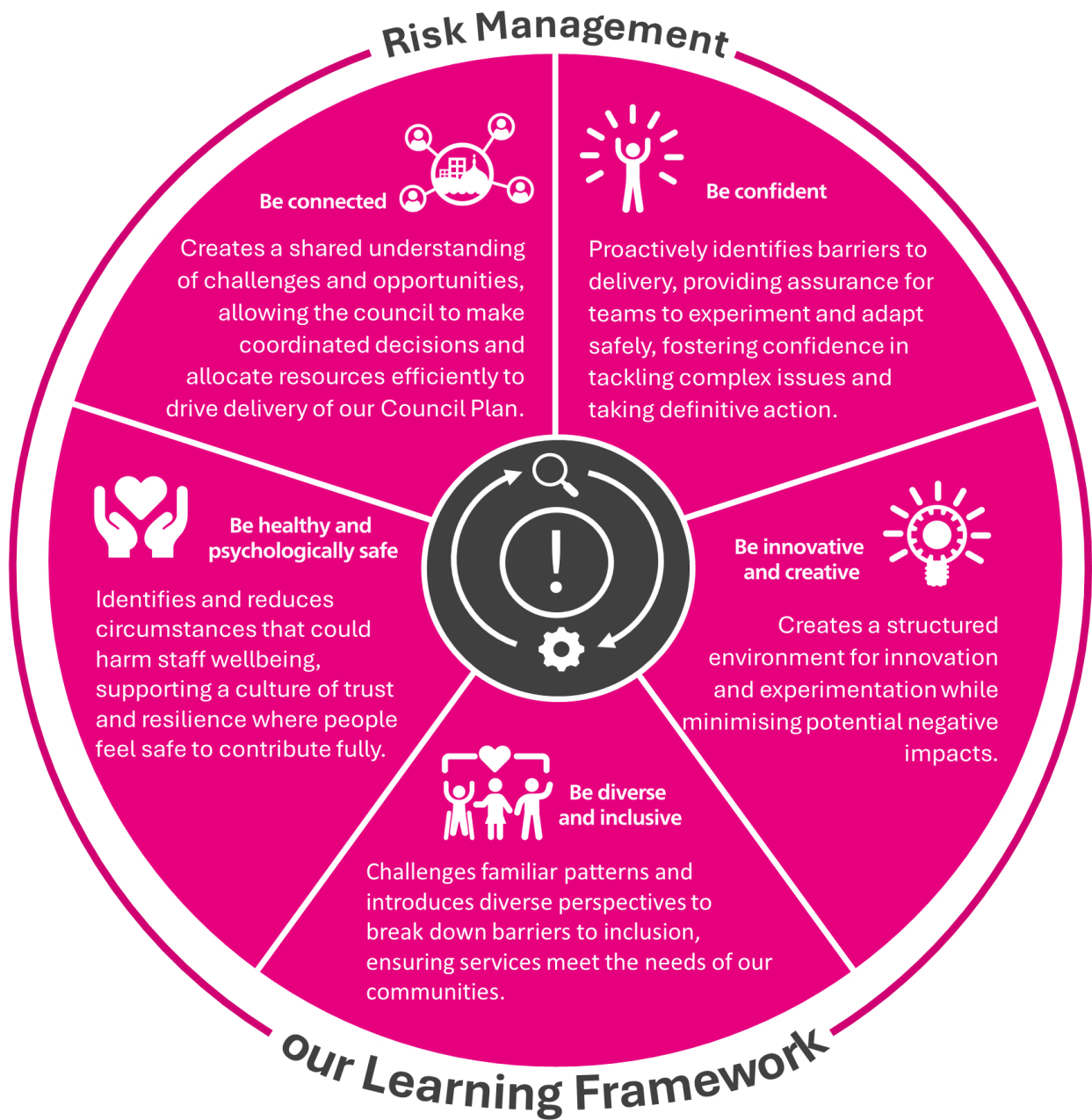
4.3. The Peer Review team provided the following feedback on risk:

To fully maximise the benefits of this new system (Cabinet and Leader system), attention must now be given to the quality and usability of risk management information. Risk reporting should be enhanced to provide clearer, more focused outputs, including succinct executive summaries that highlight key risks, mitigations and implications. This will help both members and officers engage more effectively with risk and make well-informed, proportionate decisions. A more tailored and accessible approach to risk information will also support stronger scrutiny, oversight and assurance.

In addition, there is a need to clarify the council's risk appetite. During the peer challenge it was not clear to the team what level of risk the organisation is willing to accept or tolerate in different decision-making contexts, whether in commercial ventures, innovation, service transformation, or capital projects. A clear articulation of risk appetite, aligned with the council's strategic ambitions and financial resilience, would enable officers and members to take measured risks confidently and responsibly.



4.4. Our Risk Management Framework is aligned to our Learning Framework



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

- 5.1 Appendix 1 provides the supporting information to section 3 and further details on council performance. Information in appendix 1 has been analysed to provide the summary of performance updates included in section 3.
- 5.2 Appendix 2 provides the council's approach to managing risks and Appendix 1 includes further details on the current strategic risks which feeds into developing summary of performance updates included in section 3.

## **6. Community engagement and consultation**

- 6.1 This is an internal performance reporting mechanism and as such no engagement or consultation has been undertaken in this regard.

## **7. Financial implications**

- 7.1 The Council has a challenging financial position, the most challenging in the Council's history. Reserve levels are very low, and pressures on statutory services, particularly emergency and temporary accommodation, are significant. Spend controls are in place across the authority, and this could result in performance challenges across services as a result. Actions within this report to manage the financial position, for example around increasing the supply of temporary accommodation and reducing demand, are fundamental if the Council is to be able to maintain financial sustainability.
- 7.2 It is also the case that poor performance and/or a lack of robust actions to treat identified risks can result in poor value for money or financial loss to the authority. The external auditor will therefore seek evidence, as provided in this report, that demonstrates the authority has an effective framework for monitoring, reporting and managing performance and risk and balance performance and financial risks appropriately.

Name of finance officer consulted: John Hooton    Date consulted: 08/01/2026

## **8. Legal implications**

- 8.1 The Risk Management Framework described here and the actions reported on are a key part of the arrangements put in place by the council to ensure that it meets its general duty (pursuant to section 3 of the Local Government Act 1999) to ensure continuous improvement in the exercise of its functions.
- 8.2 No other direct legal implications have been identified.

Name of lawyer consulted: Allan Wells    Date consulted: 16/12/2025

## **9. Equalities implications**

- 9.1 Being a fair and inclusive council is one of the four outcomes of the Council Plan as outlined above in section 3, and with equalities related actions within the Corporate Leadership Plan, detailed in appendix 1.



- 9.2 The council monitors workforce profiles for groups with protected characteristics through the PMF and Corporate KPIs detailed in appendix 1.

## **10. Sustainability implications**

- 10.1. There are a number of actions directly linked to sustainability within the Corporate Leadership Plan, detailed in appendix 1.
- 10.2. Sustainability related KPI measures are included within this report, detailed in appendix 1. These relate to:
- % of household waste sent for reuse, recycling and composting
  - Nitrogen Dioxide levels in Brighton and Hove (go/m<sup>3</sup> - micrograms per cubic meter): Lewes Road, North Street and London Road
- 10.3 The council has a strategic risk linked to Net Zero and the adaptation and mitigation of climate change detailed in appendix 3.

## **11. Other Implications**

### **Social Value and procurement implications**

- 11.1 No further significant implications arising from this report.

### **Crime & disorder implications:**

- 11.2 No further significant implications arising from this report.

### **Public health implications:**

- 11.3 There are a number of actions directly linked to public health within the Corporate Leadership Plan, detailed in appendix 1.

## **12. Conclusion**

- 12.1 The council believes it has a robust Performance Management Framework as evidenced by this report to meet the challenges of delivering the Council Plan in the financial context that local authorities are now working in.

## **Supporting Documentation**

### **1. Appendices**

1. Mid-year Council Plan performance update 2025/26: supporting information
2. Risk Management Framework



# Mid-year Council Plan performance update 2025/26

## Appendix 1: Supporting information

Creating the conditions for the right people, with the right information to drive delivery of our Council Plan



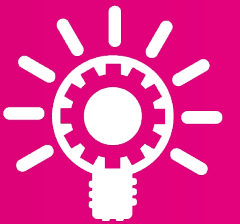
Be connected

Providing timely evidence and insight on performance to enable decisive action



Be confident

Identifying opportunities for experimentation and innovative delivery to improve the lives of our residents



Be innovative  
and creative

Providing a framework to foster an inclusive and diverse workforce and services that meet the needs of our city's communities.



Be diverse  
and inclusive

Creating a sense of clarity, purpose, and stability for our staff to empower them to perform at their highest potential



Be healthy and  
psychologically safe

# A better Brighton & Hove for all

Performance Management Framework	03
Corporate Leadership Plan	06
Corporate Peer Challenge	21
Corporate Key Performance Indicators	32
Customer insight	38
Other elements of the Performance Management Framework	48
Housing safety and compliance	71

## Performance management is fundamental to ensuring the council delivers its intended outcomes

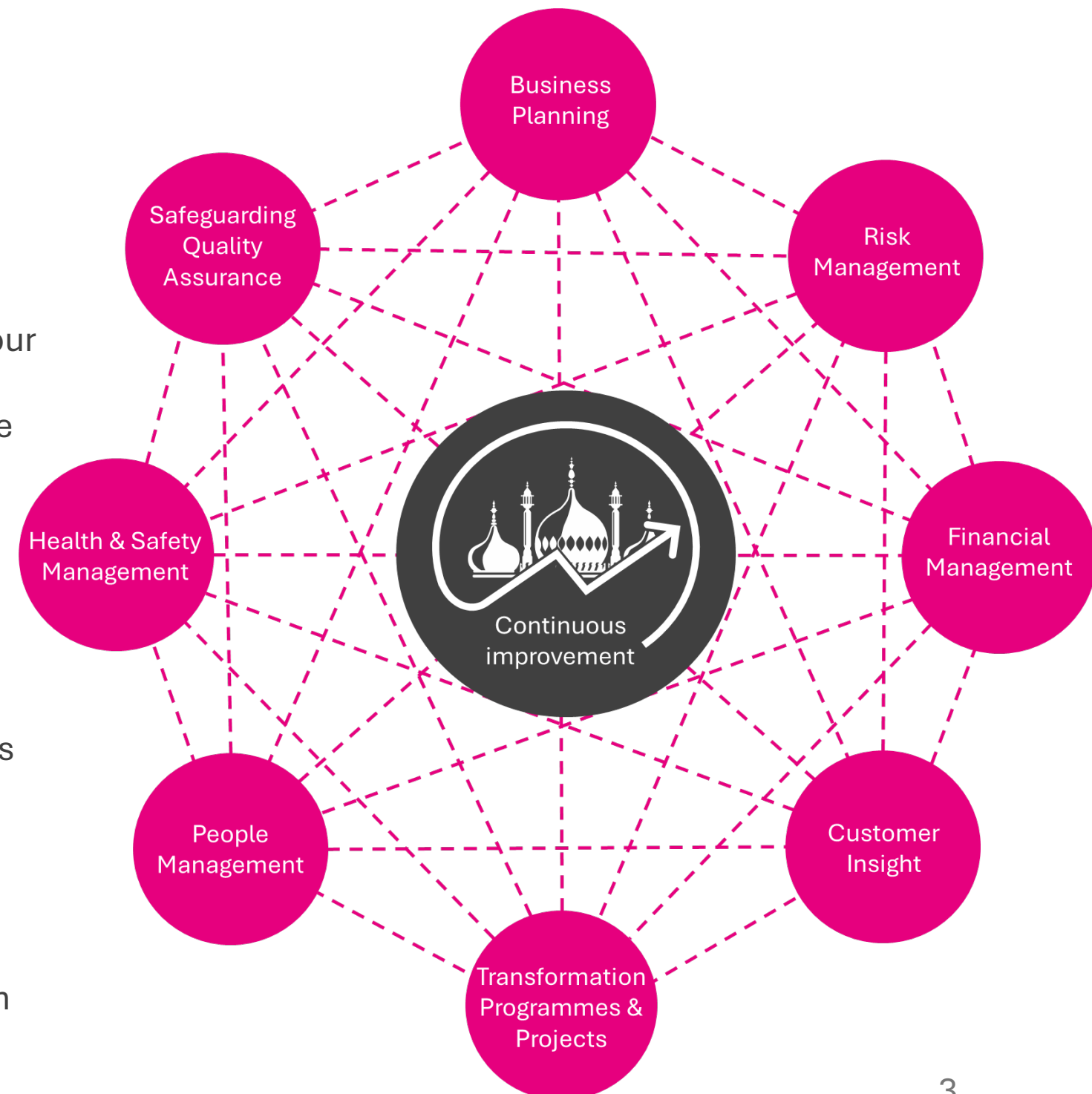
Best Value Authorities are under a general Duty of Best Value to “make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness.”

The eight elements of the Performance Management Framework are key to our Corporate Governance and allow us to understand the performance of the council which provide us with a better context in which we are operating. The elements are inter-related; most services contribute to every element in the framework.

The Performance Management Framework sets out to ensure:

- strong leadership at all levels that is consistent, fair, and challenges blame culture
- commitment to the accountability that has been assigned to individuals
- the right information reaching the right people at the right time so that suitable decisions are made and actions are taken
- ongoing evaluation, review and learning to help improve future performance
- the ability to identify and commitment to rectify poor performance at an early stage

The primary purpose of performance management is to define our intended outcomes and then monitor our progress and performance in delivering them. Where progress or performance is not as expected, this is highlighted to allow the council to take corrective action.



# Ensuring **all council activities** are aligned with **Council Plan outcomes**

National context  
and local factors

Outcomes the council  
want to achieve

The  
Council  
Plan

Rolling 4-year plan  
Refreshed annually in line with  
financial planning

Reviewed annually

Corporate  
Leadership  
Plan

Key activities to deliver  
the council plan and  
meet essential &  
statutory duties

Reviewed annually

How services and teams  
contribute to the Council  
Plan and Corporate  
Leadership Plan

Team /  
Service  
Plans  
(as needed)

Reviewed bi-annually

Performance  
Development  
Plan (PDP)

How individual staff  
contribute to the Council  
Plan and Corporate  
Leadership Plan

# Data in this report

The progress status, results and data in this report relate to the period of 1<sup>st</sup> April to 30<sup>th</sup> September 2025.

Any data included outside of this period will be highlighted and only relate to that specific information.

Data is collected from a range of sources across the council, and where appropriate included within the report. Where a RAG rating has been included this is detailed except for the following three pages.

Page 43: Savings monitoring is rated as follows:

- Red: Forecast overspend of 5% or more or £0.250m whichever is lower
- Amber: Forecast overspend of less than 5% of budget or £0.250m, whichever is lower
- Green: Breakeven or forecast underspend.

Page 44: Workforce profile is rated based on the Corporate KPI targets as detailed on page 31

Page 45: Sickness absence is rated based on the Corporate KPI targets as detailed on page 31. The DoT detailed in the table is comparing the April – September 2025 with results between October 2024 – March 2025.

Arrows within the report indicates Direction of travel (DoT) to show if performance is:

↑

 Improving | increasing

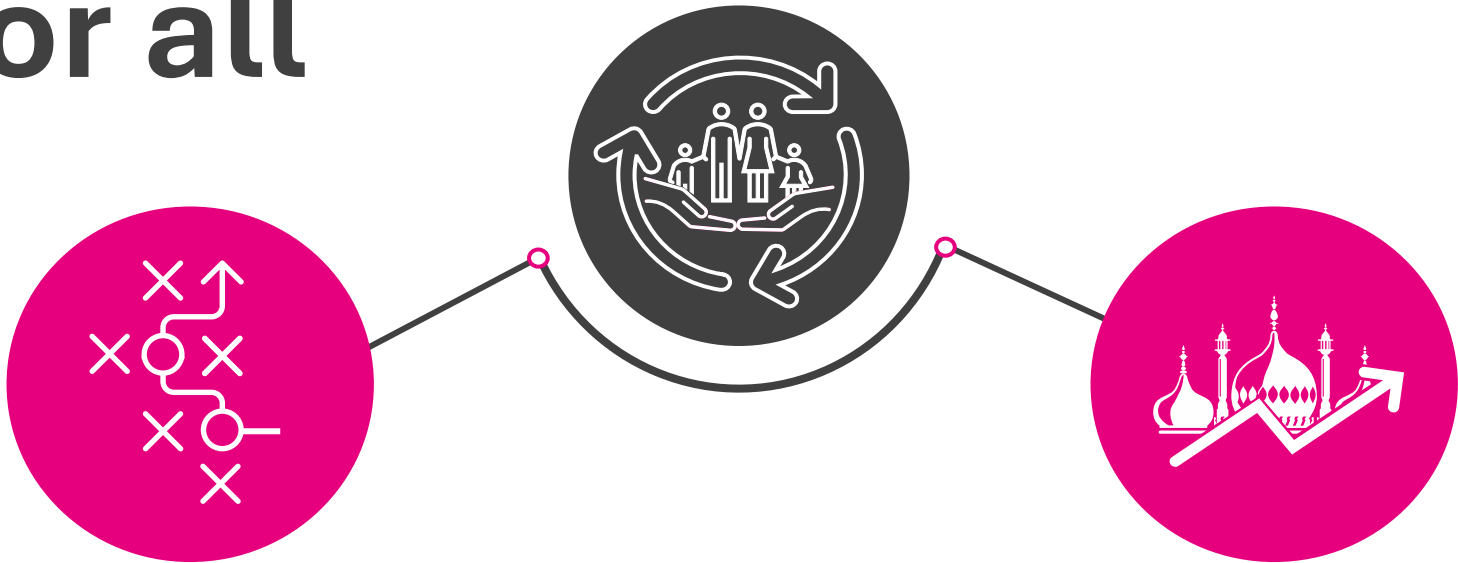
↓

 Worsening | decreasing

↔

 No change

# A better Brighton & Hove for all



The Corporate Leadership Plan ensures a Connected Council view of strategic delivery of our Council Plan. Alongside other performance insight, such as Key Performance Indicators, customer data, strategic risks, it serves as the tool for monitoring delivery of the Council Plan.

The information in this report outlines progress made against the delivery of the Council Plan between April and September 2025, highlighting our achievements, challenges and areas of focus in achieving a better Brighton & Hove for all.

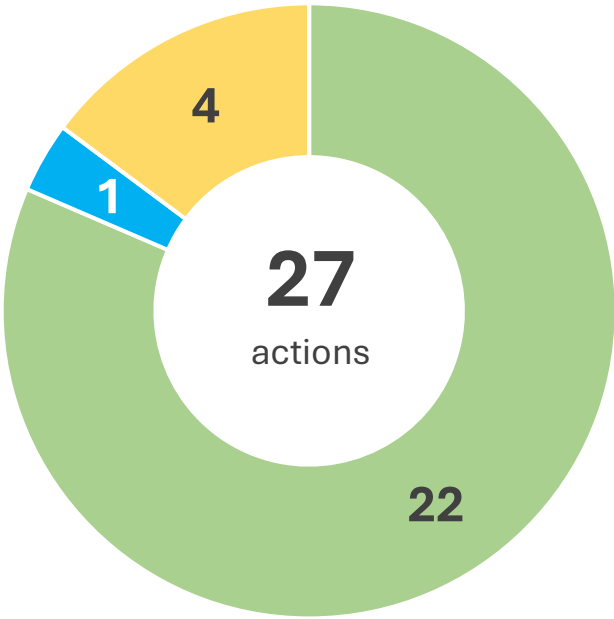
The progress, challenges and areas of focus outlined in this report are in the context of unprecedented financial challenges for the council, we are currently projecting an overspend of around £7.8 million in 2025/26 (source: TBM7), mainly due to rising temporary accommodation costs and increasing demand for children's and adult social care placements. 36% of our targeted savings are at risk of not being delivered (£5.7 million at risk).

In addition to the in-year pressures, there is a projected £25 million shortfall in 2026/27, based on funding assumptions and net expenditure projections and over £86 million for the period of 2026/27 to 2029/30.

# Corporate Leadership Plan

Mid-year progress update 2025/26

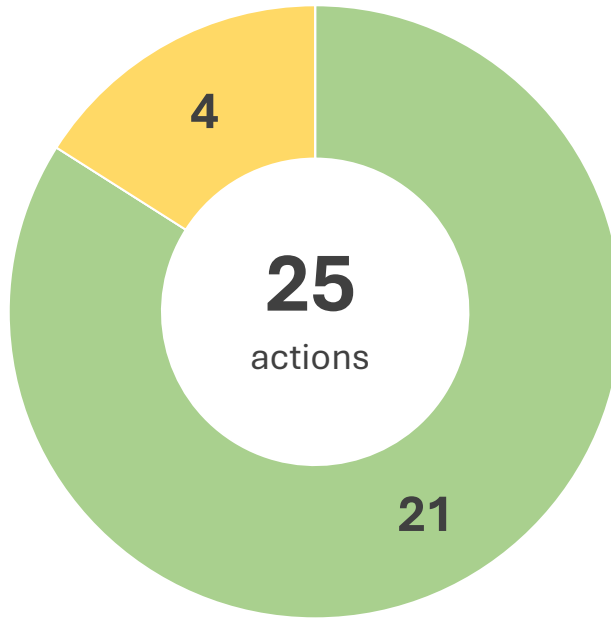




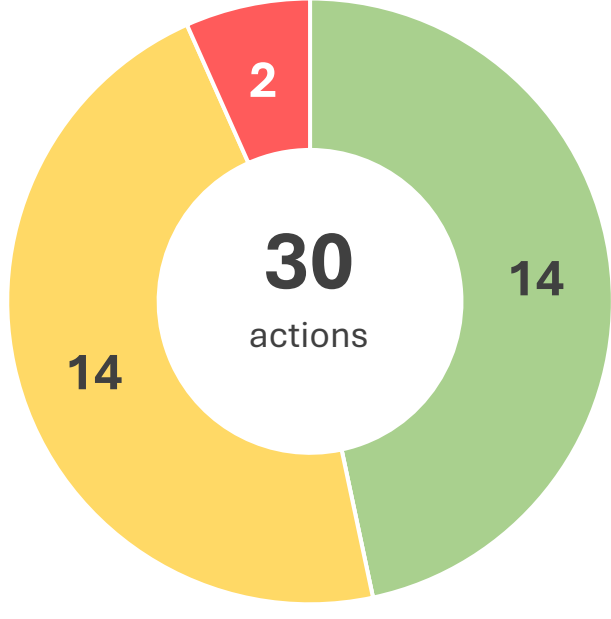
A city to be proud of



A fair and inclusive city



A healthy city where people thrive



A responsive council with well-run services

Action Status Description



The action is on-track and being delivered as expected, or with slight variance that has no meaningful impact on overall benefits. For example, it was slightly delayed but there was no impact on our customers.



The action is off-track but will be delivered largely as expected with any impact on overall benefits not considered significant. For example, you have plans in place to deliver the required action but there are challenges or issues that may impact, or are impacting, our ability to deliver it as previously expected – this requires us to pro-actively monitor the action



The action is off-track with the potential to have a significant impact on the delivery of the expected benefits, or outcome. We do not expect to deliver the work as planned and further action is required to bring the work back on track.



The action has been completed and has had the anticipated impact and delivered the expected benefits, or the action has been completed with slight variance but there is no significant impact on overall benefits. Outcomes have been realised through delivery of the action



All work on this action has currently stopped and we will not deliver the expected outcomes.











# Council Plan Outcomes: Corporate Leadership Plan action references

## Ref Outcome








1	A city to be proud of
1.1	Investing in our city
1.1.1	Develop Brighton & Hove as a place where people want to live, work, and learn
1.1.2	Grow a diverse and sustainable city economy
1.1.3	Promote and protect what makes Brighton & Hove unique
1.1.4	Develop talent and enable lifelong learning
1.2	An accessible, clean, and sustainable city
1.2.1	Keep our city clean and manage waste
1.2.2	Work towards carbon net zero
1.2.3	Protect and enhance the city's natural environment
1.2.4	Make it easier for people to move around the city
2	A fair and inclusive city
2.1	An inclusive and fairer city
2.1.1	Engagement and collaboration
2.1.2	Fight discrimination and embrace diversity
2.1.3	Work to reduce inequality
2.2	A city where people feel safe and welcome
2.2.1	Tackle crime and antisocial behaviour
2.2.2	Create safe public spaces that are accessible for all
2.3	Homes for everyone
2.3.1	Improve housing quality
2.3.2	Increase housing supply
2.3.3	Improve housing support for residents











## Ref Outcome











3	A healthy city that helps people to thrive
3.1	A better future for children and young people
3.1.1	Keep children and young children safe and ensure no child or family is left behind
3.1.2	Develop our prevention and family support offer
3.1.3	Support the provision of high quality and inclusive education from early years through to adult learning
3.1.4	Work with partners to deliver ambitious employment, training and apprenticeship opportunities
3.2	Living and ageing well
3.2.1	Enable people to live healthy, happy and fulfilling lives
3.2.2	Provide joined up services and ensure everyone has access to the information, advice and services they need
3.2.3	Ensure there is a safe, effective, sustainable and quality health and care provision in the city
4	A responsive and learning council with well-run services
4.1	Meeting the needs of our residents and other customers
4.2	Our ways of working
4.3	Good governance and financial resilience

Ref	Action	Action status
1.1.1	Continue to attract major international events to raise the profile of Brighton & Hove as an international destination and develop the citywide events programme to ensure greater ownership for residents.	
1.1.1	Further develop the seafront as a key leisure destination for the benefit of visitors and residents.	
1.1.1	Deliver the Sports Facilities Investment Plan (SFIP) to improve indoor sports facilities in the city.	
1.1.1	Prepare and implement the City Plan to shape development and design of land use and the city's built environment, including infrastructure to meet the city's needs	
1.1.1	Develop and consult on proposals for Local Government Reorganisation to achieve the best outcomes for the city and the region.	
1.1.2	Use our parking assets to support an inclusive economy and meet the city's diverse needs.	
1.1.2	Attract multi-date conferences and a varied live entertainment programme for the Brighton Centre to increase visitors to the venue, and to maximise revenue and economic impact to the city.	
1.1.2	Work with neighbouring authorities to establish the Sussex & Brighton Mayoral County Combined Authority and prepare for mayoral elections.	
1.1.2	Lead the city's major regeneration portfolio to protect and enhance the environment and attract investment	
1.1.2	Deliver our Economic Plan for the city to grow the local economy, creating more jobs for city residents and building community wealth.	











Ref	Action	Action status
1.1.3	Effectively manage contractual and funded partnerships to deliver a varied and inclusive cultural offer across the city for residents and visitors.	●
1.1.3	Promote Creative & Cultural Industries across the city in relation to creative destination management, public art, cultural and creative sector development, and culture at risk.	●
1.1.3	Deliver the Shared Prosperity Fund to support core programmes in line with allocations agreed with MHCLG that benefit our communities	●
1.1.3	Ensure the city remains a leading national and international visitor destination, promoting the city as a place to host events and conferences that deliver an economic benefit.	●
1.1.4	Deliver high quality adult skills courses to support life long learning and to maximise employment opportunities.	●
1.1.4	Develop a Libraries Plan to provide a sustainable model for the future	●
1.2.1	Deliver the Environmental Services Improvement Programme to develop a sustainable, efficient waste management service with a focus on minimising waste and keeping the city clean and attractive.	●
1.2.2	Increase resilience of the city for Surface Water Flooding, Ground Water Flooding and the impact of climate change.	●
1.2.2	Develop a new programme to address the climate and biodiversity emergencies and help the city transition to carbon net zero.	●
1.2.2	Develop the Fleet Strategy and deliver fleet replacement plan to ensure sustainable service delivery	●

Ref	Action	Action status
1.2.3	Enhance and preserve the city's parks, trees and green spaces to keep them safe and attractive for residents and visitors, and increase biodiversity.	
1.2.3	Implement the objectives of the City Downland Estate Plan (CDEP) to protect and enhance the land for future generations.	
1.2.4	Begin construction of phase 2 of the coastal protection scheme and undertake the Kings Road Arches structural work.	
1.2.4	Develop and launch a new City Transport Plan setting out a long-term vision for the city's transport network including a better connected network integrating the different modes of transport.	
1.2.4	Make parking services fairer and more simple to understand	
1.2.4	Efficiently manage movement on the transport network to promote a safer, healthier, and more accessible city	
1.2.4	Continue to develop and enhance the Highway Asset Management Framework to manage asset condition, deliver planned maintenance programmes and improve public safety on the highway.	











Ref	Action	Action status
2.1.1	Enable effective consultation and engagement with communities, staff and stakeholders over key council strategies and policies in order to provide the insights, lived experience and expertise and learning to drive innovative service delivery and change	
2.1.1	Effectively communicate information about and also progress and achievements for the council's corporate priorities and services with our residents, businesses, staff and stakeholders so that people are informed how they can access, engage or shape our services.	
2.1.1	Refresh the city's strategic partnership arrangements to collectively address city challenges	
2.1.2	Develop a gender inclusion toolkit	
2.1.2	Actively seek to understand, engage with, and address the needs of the city's diverse communities through inclusive, accessible, and anti-racist service delivery that responds effectively to changing demographics.	
2.1.2	Create a council that is equitable, diverse, inclusive and accessible as an employer by implementing the Fair and Inclusive action plan, leading on initiatives to deliver the corporate aim of a diverse workforce at all levels and work actively to achieve the council's commitment to being a fair and inclusive place to work.	
2.1.3	Deliver the Thriving Communities Investment Fund in support of the CVS across the City	
2.1.3	Secure our re-accreditation as a City of Sanctuary and implement the associated Action Plan	
2.1.3	Enable cross council and city collaboration to address poverty	
2.2.1	Collaborate with city partners in delivering the Community Safety Strategy	











Ref	Action	Action status
2.2.2	In partnership with communities, develop a Community Cohesion strategy	
2.2.2	Protect public health and the environment and support local businesses to maintain a fair and safe trading environment.	
2.3.1	Maximise rent collection and reduce arrears to secure consistent revenue to reinvest in housing and improve the financial position for residents to sustain their tenancy.	
2.3.1	Take forward Cabinet recommendations for future remediation/regeneration of LPS Blocks	
2.3.1	Improve the condition of private rented sector accommodation to improve the health, safety and wellbeing of tenants.	
2.3.1	Deliver Planned and Major Works Capital Programmes to ensure our housing assets are maintained, improved and kept in a good state of repair.	
2.3.1	Invest in building and fire safety to meet duties under the Building Safety Act and new Fire Safety (England) Regulations and ensure we are compliant with Health & Safety.	
2.3.1	Ensuring ongoing viability of Housing Revenue Account (HRA)	
2.3.1	Ensure the council complies with Social Housing Regulation Act 2023 and meets the four consumer standards to improve safety and quality of homes, resident engagement and satisfaction. Prepare for potential regulator of social housing inspection.	
2.3.1	Improve the energy performance of council and private sector homes to make homes warmer, reduce costs for residents and reduce our carbon footprint.	



Ref	Action	Action status
2.3.2	Commission single homelessness and rough sleeper supported accommodation to provide support for people to transition towards independent living.	
2.3.2	Create additional social housing lets by reducing under occupancy to make best use of available housing in the city.	
2.3.2	Transform how we deliver housing services by embracing innovation to meet rising demand and growing complexity with agility and impact	
2.3.2	Implement the new Housing Strategy to deliver accessible, affordable and high-quality homes for everyone in Brighton & Hove.	
2.3.2	Increase housing supply of additional, affordable and Council homes to meet the needs of current and future residents.	
2.3.2	Becoming a 'Great landlord' where tenants know that they are valued, treated with respect; and the staff who work with and for tenants are empowered and given the time to be creative and kind	
2.3.2	Build new council homes to meet the number of homes required in the city.	
2.3.3	Develop and deliver a temporary accommodation acquisition strategy	
2.3.3	Develop and deliver the Homelessness and Rough Sleeping Strategy	
2.3.3	Optimise the repairs and maintenance service for council owned housing, maintaining high tenant satisfaction and maximise social value.	























Ref	Action	Action status
3.1.1	Deliver the city's Special Educational Needs & Disability (SEND) Strategy 2021-2026 to protect and improve outcomes for children and young people with special educational needs and disabilities	
3.1.1	Improve the educational outcomes for the city's most disadvantaged to support all children and young people to reach their potential	
3.1.1	Deliver a robust and improving social work and social care service that keeps children safe.	
3.1.1	Transform how we deliver children's services by embracing innovation to meet rising demand and growing complexity with agility and impact	
3.1.2	Improve the health and wellbeing of children and young people in Brighton & Hove through the delivery of our Starting Well programmes	
3.1.2	Work with partners to meet the needs of children & young people with emotional and mental health needs in order to keep them safe and well	
3.1.2	Work with partners to ensure all young people can access high quality youth services to support their transition into adulthood.	
3.1.2	Deliver Families First transformation programme	
3.1.3	Review the Home to School Transport arrangements to support a more efficient and cost effective service	
3.1.3	Support early years and childcare providers, including our nurseries and nursery classes to ensure the best start in life through providing high quality early years services	

Ref	Action	Action status
3.1.3	Implement a School Organisation Strategy to address surplus places and budgetary pressures to promote sustainability of the city's schools	
3.1.3	Continue investment in our education buildings to ensure learning environments are fit for purpose.	
3.1.4	Support the development of the Get Sussex Working Plan to tackle economic inactivity across the city	
3.2.1	Support people to age well in Brighton & Hove	
3.2.1	<p>Improve the health and wellbeing of adults across the city through the delivery of our Living Well programmes:</p> <ul style="list-style-type: none"> <li>- Physical Activity &amp; healthy weight</li> <li>- Public Mental Health and Suicide Prevention</li> <li>- Drugs &amp; alcohol</li> <li>- Tobacco control &amp; stop smoking</li> <li>- Sexual health</li> </ul>	
3.2.1	Provide assurance and support for health protection ensuring robust prevention and response systems are in place.	
3.2.1	Support the Council to deliver the Health and Wellbeing Strategy to address the broader determinants of health.	
3.2.2	Deliver the Carers Strategy to improve outcomes for carers in the city	
3.2.2	In partnership with the Integrated Care Board, refresh the Joint Health and Wellbeing Strategy and progress place-based integrated care - delivering more joined-up support and better outcomes for our residents.	
3.2.2	Deliver the next phase of Transitions Strategy to support young people moving into adult services and that they are integrated	











Ref	Action	Action status
3.2.3	Deliver the next phase of Adults Learning Disabilities and Autism Partnership Strategies	
3.2.3	Plan for mobilisation of new Supported Living Service	
3.2.3	Together with statutory partners of the SAB achieve the strategic priorities, contribute to all Safeguarding Adults Reviews (SAR), meaningful learning from SAR activities and influence change. Bring learning closer to front line safeguarding practice	
3.2.3	Deliver the Adult Social Care Improvement Plan meeting regulation standards and service redesign outcomes	
3.2.3	Transform how we deliver adult social care by embracing innovation to meet rising demand and growing complexity with agility and impact	

# A responsive and learning council with well-run services

Ref	Action	Action status
4.1	Develop and implement a Transformation & Innovation approach and portfolio to ensure focus remains on delivery of the Council Plan and Medium-Term Financial Strategy, and embedding Learning Organisation.	
4.1	Innovate our customers' experience by enhancing in-person services, improving telephone services, and simplifying access for residents through an improved digital offer and the exploration of new technology	
4.1	Turbo charge innovation through a series of technology pilots to drive service efficiencies and savings across the council and produce execution plans for 2026/27	
4.1	Improve organisational resilience through robust emergency planning and business continuity planning arrangements.	
4.2	Modernise and maintain the council's operational buildings so they remain fit for purpose, safe and secure	
4.2	Streamline the approach to employee relations case work across the council, embedding innovation while strengthening industrial relations with recognised trade unions.	
4.2	Deliver Our People Strategy to ensure the council has the diverse workforce needed to deliver council plan priorities, statutory and essential functions within our Learning Organisation framework	
4.2	Review of pay and reward framework to ensure it is modern and fit for purpose and supports recruitment and retention of a diverse workforce.	
4.2	Build organisational capacity by equipping staff with critical skills aligned with the council's transformation and innovation goals and strategic priorities.	
4.2	Deliver a transformative programme to operationalise our learning framework, to become a more connected, confident, creative and innovative, diverse and inclusive and healthy and psychologically safe organisation to deliver the council's vision of a better Brighton & Hove for all.	

Ref	Action	Action status
4.2	Align the priorities and actions of the Digital, Data and Technology portfolio to support the delivery of the council plan priorities and support in the transformation of service delivery	
4.2	Review the effectiveness of the Orbis Partnership including the Medium Term financial commitment and savings	
4.2	Deliver a programme of work to improve core finance and HR systems	
4.2	Improve the customer experience and operational efficiency within Council Tax, Housing Benefits and Pension and Payroll Service.	
4.3	Embed the new Health & Safety oversight arrangements to monitor compliance and drive improvements of health, safety and wellbeing performance and practice across the council	
4.3	Continually develop and implement the corporate performance management approach to provide oversight of the delivery of the Council Plan	
4.3	Develop and implement risk management framework to improve the quality of insight, enabling timely actions that support strategic planning and decision-making.	
4.3	Review Adult Social Care Finance pathways and processes, including financial assessments, debt management and provider payments	
4.3	Identify specific areas of the council where a commercial approach and / or innovative ways of generating income could strengthen financial sustainability, and progress identified projects to implement changes as part of the 26/27 budget process and medium-term financial plans.	
4.3	Maximise income generation through innovative service delivery across bereavement services	

## A responsive and learning council with well-run services

Ref	Action	Action status
4.3	Review the councils information governance vulnerabilities and cyber risks, and develop an action plan to reset and strengthen policy and processes to better manage the risks	
4.3	Ensure effective Monitoring Officer and Democratic Services support to deliver robust governance arrangements and embed changes to streamline support to the cabinet model of governance.	
4.3	Provide an effective scrutiny service and develop a sustainable model for scrutiny function within financial constraints	
4.3	Maximise income generation through innovative service delivery across registration and mortuary services	
4.3	Maintain the Contract Management Framework, including changes required by new procurement regulations, compliance with standing orders and implement improved oversight over contract management across the council.	
4.3	Optimise the use of council assets through generating capital receipts, increasing income, and delivering efficiencies.	
4.3	Develop a strategy to rebuild reserves and establish a stronger financial position.	
4.3	Strengthen financial controls and oversight of in-year budget management to achieve the required savings	
4.3	Develop the Medium Term Financial Strategy, capital programme and transformation programme to enable the council to deliver on its priorities and address its longer-term financial pressures in a structured way.	
4.3	Implement internal audit actions to improve key financial systems and processes (including pension/payroll, housing rent, housing benefits, council tax) with a view to address partial assurance	

# Corporate Peer Challenge

Mid-year progress update 2025/26



**Recommendation 01** The council needs to develop a robust and comprehensive financial strategy that delivers both the necessary savings and the longer-term financial resilience across all funding streams such as building back reserves, including the General Fund, Housing Revenue Account (HRA) the Dedicated Schools Grant (DSG), the equal pay claims risk and the transformation programme and its priorities. This work is urgent and must be progressed at pace.

**CLT Lead** John Hooton

**DLT Lead** Haley Wollard

**Action** Develop the Medium Term Financial Strategy, capital programme and transformation programme to enable the council to deliver on its priorities and address its longer-term financial pressures in a structured way.

**Q2 update** This is a significant piece of work for the Council which is being developed in the context of significant financial pressures. The main drivers of our financial pressures are demand and cost increases for temporary accommodation, adults and children's social care placements, and home/school transport. The Council also has one of the lowest levels of reserves in the country.

Cabinet and CLT have had multiple workshops and deep dives to support this work, and the first draft of savings proposals are being developed and reviewed in time for the budget report at December's Cabinet meeting. Priorities for next quarter continue to be scrutinising proposals, developing further mitigations and savings proposals and completing the review of the capital programme and capital receipts strategy.

**Status** Amber

**Action** Strengthen financial controls and oversight of in-year budget management to achieve the required savings

**Q2 update** There continues to be a significant focus on in-year budget management throughout 2025/26. The monthly position has been reviewed by both CLT and Cabinet and is published on a quarterly basis.

There is an improved position at TBM (from £14.5m at TBM3), however the projected overspend is still concerning at £9.4m. Work is continuing to further develop financial recovery plans to mitigate the overspend.

**Status** Red





**Recommendation 01** The council needs to develop a robust and comprehensive financial strategy that delivers both the necessary savings and the longer-term financial resilience across all funding streams such as building back reserves, including the General Fund, Housing Revenue Account (HRA) the Dedicated Schools Grant (DSG), the equal pay claims risk and the transformation programme and its priorities. This work is urgent and must be progressed at pace.

**CLT Lead** John Hooton

**DLT Lead** Haley Wollard

**Action** Develop and implement a Transformation & Innovation approach and portfolio to ensure focus remains on delivery of the Council Plan and Medium-Term Financial Strategy, and embedding Learning Organisation.

**Q2 update** The indicator is amber due to the corporate savings target of £15.789m being £4.179m (26pct) at risk at TBM5. A factor impacting the ability to deliver savings is a lack of organisational capacity to drive change.

A Transformation and Innovation portfolio containing ten strategic programmes has been agreed by the Corporate Leadership Team (CLT) and is being implemented to help meet ongoing budget challenges and the need for continuous improvement. The strategic programmes are developing proposals, savings targets, investment requirements and delivery plans in line with the budget timetable.

The Savings and Innovation Delivery Board is meeting fortnightly to drive delivery of the council's budget savings and associated Transformation and Innovation proposals.

CLT is holding five weekly Innovation themed meetings to oversee progress and conduct

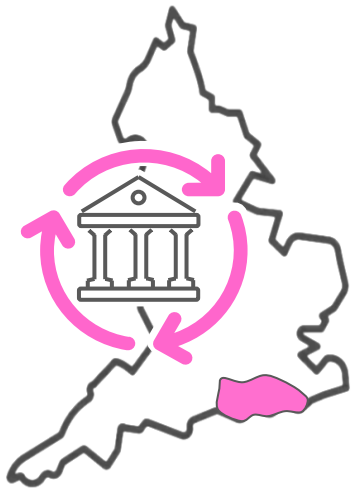
Work in progress to develop a Transformation & Innovation zone on the Wave, which will include a new Agile Toolkit. This will include guidance for document retention and ownership of commissioned work including reports. Once this work is completed, a briefing will be made available to senior managers to ensure consistency of approach.

**Status** Amber

**Action** Develop a strategy to rebuild reserves and establish a stronger financial position.

**Q2 update** The reserves position remains unchanged from Q1, and although the position has improved from the last financial year, it is still lower than the level at which reserves should be. The strategy that was agreed by Cabinet in July will continue to be implemented over the next 3-4 years.

**Status** Red



**Recommendation 02** Develop a shared vision and narrative with all tiers of local government including upper tier as well as district and borough councils across Sussex on devolution and Local Government reorganisation. A shared narrative developed in collaboration with partners across Sussex is essential in relation to Devolution and Local Government Reorganisation. Building a collective vision for the future of local governance will be vital to ensure influence and readiness in shaping any forthcoming changes.

**CLT Lead** Liz Culbert

**DLT Lead** Sanjan Haque/Tom Cottam

**Action** Work with neighbouring authorities to establish the Sussex and Brighton Mayoral County Combined Authority and prepare for mayoral elections.

**Q2 update** The Devolution Programme Director has started in role and new Devolution Programme Board has been established to support delivery across the Council.

An interim Chief Officer for an emerging MCCA has started and is appointing an interim team to guide the creation of the new MCCA.

An informal Partnership Board with representation from the three Upper Tier Authorities and senior partners from across Sussex has been scheduled with the first meeting taking place in early October.

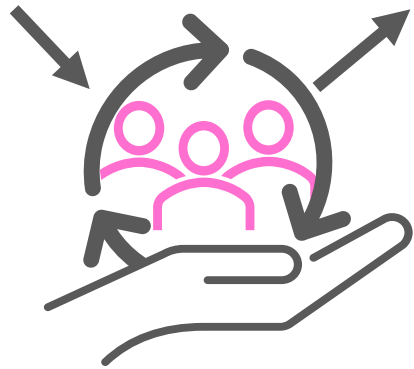
The Cabinet report seeking consent to move forward with the creation of a new MCCA for Sussex and Brighton has been published and will be debated by full Council on 13 October and by Cabinet on 16 October.

**Status** Green

**Action** Develop and consult on proposals for Local Government Reorganisation to achieve the best outcomes for the city and the region

**Q2 update** BHCC successfully submitted a proposal for the government's local government reorganisation on 26 September 2025.

**Status** Complete



**Recommendation 03** The cultural transformation within Environmental Services must continue, with an ongoing focus on strengthening industrial relations, improving workforce engagement, and embedding new ways of working. Any alleged criminal behaviour should be referred by the council to the relevant authorities.

**CLT Lead** Ali Mcmanamon

**DLT Lead** Rachael Joy

**Action** Deliver the Environmental Services Improvement Programme to develop a sustainable, efficient waste management service with a focus on minimising waste and keeping the city clean and attractive.

**Q2 update** Work is continuing to improve the recycling rate through the introduction of a new food waste collections service, with the first phase commencing in the East of the city in September, and further roll out planned late October, November and next year. Further work is continuing on introducing wider dry recycling materials such as pots, tubs and trays, cartons and aluminium foil. A recycling leaflet is being included in food waste caddies, as part of the introduction of the new service to assist resident understanding on all of the materials collected from their homes.

The activities associated with the waste minimisation plan as continuing to support the reduction of residual waste, which includes preparing a range of communications assets to support residents to reduce their waste, educating residents and crews on contamination and how to recycle correctly as well as working with the universities to improve student engagement.

The digitisation of the collections service is continuing to embed, to ensure lasting and sustainable improvements. The trade waste module has been fully implemented, with the service currently working in the test system for domestic refuse, recycling and garden waste modules which will soon go live. Drivers are trained and utilising the technology to record their work assisting back office processes where performance can be measured to drive future efficiencies. Once live, residents will benefit from timely information on their collections.

**Status** Green

**Action** Streamline the approach to employee relations case work across the council, embedding innovation while strengthening industrial relations with recognised trade unions.

**Q2 update** Work on streamlining employee casework has continued and will be linked to the introduction of the 'front door' system for initial employee relations queries. This will sit at the core of the HR department and ensure that requests for advice are directed to the appropriate person thus improving efficiency and targeting resources most effectively. The front door (now titled HR Service Desk) has been piloted since early September and has proven very successful with clear evidence of the benefits and the capacity this can create to focus on complex casework. Using the learning from this pilot we are now looking at how we scale up and expand this new model. The Council's Industrial Relations Strategy has been developed and agreed and, now that the Industrial Relations Manager has returned to his substantive post, will be taken forward in partnership with our recognised trade unions.

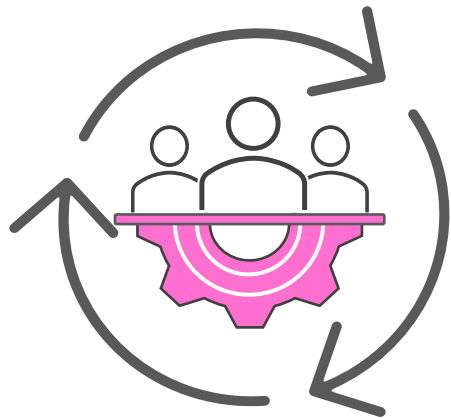
**Status** Amber



**Recommendation 04** The council should seek to drive the desired cultural change towards being a learning organisation more widely across the organisation, ensuring consistent communication, leadership behaviours and staff engagement in all departments and at all levels.

**CLT Lead** Alan Steeden

**DLT Lead** Lindsey Pearce



**Recommendation 05** The aspiration to become a learning organisation is commendable and presents a real opportunity. To continue to make this a reality, the council needs to define and operationalise what this means in practical terms across different service areas, embedding mechanisms for feedback, innovation and knowledge sharing.

**CLT Lead** Alan Steeden

**DLT Lead** Lindsey Pearce

**Action** Deliver a transformative programme to operationalise our learning framework, to become a more connected, confident, creative and innovative, diverse and inclusive and healthy and psychologically safe organisation to deliver the council's vision of a better Brighton and Hove for all.

**Q2 update** Bespoke development interventions being delivered to Directors and leadership teams. Development of Ideas and Learning Labs continuing. Performance management and values & behaviours framework refresh continuing and going to CLT for further discussion and shaping Q3. In-house development of bi-annual staff survey continuing following a shift in direction and decision by CLT to delay roll-out to Q4. Culture Shift Mission Group approach to operationalising the learning framework designed Q2 to be led by People & Innovation DLT.

Digital Innovation programme has impacted Learning, Inclusion and Organisational Development / Culture Shift capacity. Learning, Inclusion & Organisational Development service redesign started Q2, due to complete Q1 2026 and likely to impact on change capability/pace. Not delivering as expected may slow transformation in our journey to becoming a Learning Organisation.

Work under this action will be brought under the oversight of the Culture Shift Mission Group to ensure coherence and drive delivery. Mission Group due to launch Q3.

**Status** Amber



**Recommendation 06** The improvement work of the council housing service in response to the recent judgement by the regulator remains a top priority. The council should continue to build upon recent work with a renewed, ambitious strategy that addresses both operational challenges and long-term objectives that links to the financial strategy and is underpinned by a strong assurance framework.

**CLT Lead** Genette Laws

**DLT Lead** Martin Reid

**Action** Optimise the repairs and maintenance service for council owned housing, maintaining high tenant satisfaction and maximise social value.

**Q2 update** We continue to make consistent positive progress in significantly reducing our backlog of routine repairs, at the end of September 2025 the total number of outstanding repairs was 4999, during the same month we received 4504 new repair requests. The service no longer considers this a significant backlog but continues to work to improve turnaround times for repairs and improve customer satisfaction, in line with the corporate leadership plan that states we will "Optimise the repairs and maintenance service for council owned housing, maintaining high tenant satisfaction and maximise social value.". Our Q2 2025/26 figures show the service meeting our target of 99% of Emergency repairs completed within 24 hours. Customer satisfaction targets are also being met.

We continue to optimise the social value of the in-house service through our award-winning apprenticeship programme, our Material Supply Chain contract and contractors. Our Creating Great Homes Together – Continuous Improvement Plan seeks to address recurring issues and systemic challenges across key service areas, including day to day repairs.

**Status** Green

**Action** Invest in building and fire safety to meet duties under the Building Safety Act and new Fire Safety (England) Regulations and ensure we are compliant with Health and Safety.

**Q2 update** Investment in building and fire safety compliance resources continues as a priority. We have expanded our Fire Safety Team with a new Fire Safety Lead, Contract Manager, Fire Safety Surveyor and additional Planner.

We are regularising contractual arrangements to support contractor capacity and ensure compliance regarding works to high-rise blocks. Fire Risk Assessments are compliant, and consistent positive progress is being made in reducing open remediation actions, particularly high risk actions, with a programme delivering to Dec 2026. Monthly meeting and reporting is underway with ESFRS in addition to continued intensive engagement with RSH.

Building Safety resource has been expanded to continue development of Building Safety Cases and support responses to BSR direction to apply for a building assessment certificate for 9 blocks by March 2026.

Monthly Housing Safety & Quality Assurance Board meetings continue provide oversight and monitoring of progress

**Status** Amber





**Recommendation 06** The improvement work of the council housing service in response to the recent judgement by the regulator remains a top priority. The council should continue to build upon recent work with a renewed, ambitious strategy that addresses both operational challenges and long-term objectives that links to the financial strategy and is underpinned by a strong assurance framework.

**CLT Lead** Genette Laws

**DLT Lead** Martin Reid

**Action** Ensuring ongoing viability of Housing Revenue Account (HRA).

**Q2 update** HRA Medium Term Financial revenue position provides a net deficit after allocation of revenue and capital budgets. In line with MTFS we are reviewing actions and mitigations, particularly around maximising income. We have responded to Government rent convergence consultation and continue to review flexibilities around increasing rents. A review of all income streams will be conducted alongside review of service efficiencies, ensuring it is running as efficiently as possible to ensure the HRA maximises all of its resources.

We continue to review all external funding resources, including via MHCLG and Homes England, particularly where these may support remediation of existing buildings such as through Homes England Cladding Safety Scheme.

We will also review: Asset Management Strategy; Procurement; in house options; alternative delivery models; continue to support new housing supply, where we don't currently subsidise, creating a surplus based on our 30 year projections.

We are seeking external Treasury advice to inform structured investment modelling and reviewing HRA financial data to align investment priorities with capacity and risk with a view to a 30-year HRA Investment Strategy.

**Status** Amber



**Recommendation 07** Work to mitigate the financial pressures associated with homelessness needs to be accelerated. This should include proactive reviews, service redesign, improved partnership working, and innovative housing solutions to manage demand and associated costs.

**CLT Lead** Genette Laws

**DLT Lead** Harry Williams

**Action** Develop and deliver the Homelessness and Rough Sleeping Strategy

**Q2 update** Work to develop the Homelessness and Rough Sleeping Strategy for 2025 to 2030 is on track.

The draft strategy is currently in consultation ending in October 2026. Events have been held with partners working in the sector across the city, as well as public events, consultation with members and an online survey available to all. An easy read guide for the draft strategy has been produced to support access for all residents to respond to the consultation.

**Status** Green

**Action** Develop and deliver a temporary accommodation acquisition strategy

**Q2 update** Work to develop a Temporary Accommodation Acquisition Strategy has commenced, with initial efforts focused on scoping the strategy and reviewing existing models from other councils. The strategy will outline what types of Temporary Accommodation the council intends to source—whether through booking, leasing, or purchasing—over the coming years, informed by data on demand for Temporary Accommodation services.

Progress has been slower than anticipated due to competing priorities. However, we will be introducing the role of Programme Manager – which is currently under recruitment and is expected to bring additional capacity and support to this work. This new role is specifically designed to help drive forward key projects and is anticipated to enable more substantive progress over the next two quarters.

**Status** Green



**Recommendation 07** Work to mitigate the financial pressures associated with homelessness needs to be accelerated. This should include proactive reviews, service redesign, improved partnership working, and innovative housing solutions to manage demand and associated costs.

**CLT Lead** Genette Laws

**DLT Lead** Harry Williams

**Action** Transform how we deliver housing services by embracing innovation to meet rising demand and growing complexity with agility and impact

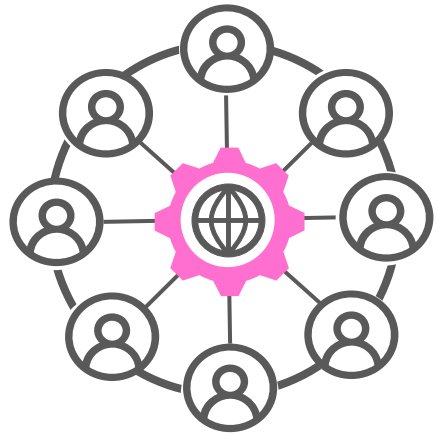
**Q2 update** The council's priority of Creating Homes for Everyone will be supported by targeted work to address under-occupation in social housing. This initiative is designed to free up larger homes for families currently living in overcrowded or temporary accommodation, helping to alleviate housing pressure and improve outcomes for those in greatest need.

To embed this work strategically, the Under Occupation Group was re-established in October 2025. This group will lead the development of a comprehensive strategy through the following milestones:

- December 2025: Complete analysis of occupancy data to identify trends and opportunities.
- April 2026: Form a Resident Advisory Group to ensure lived experience informs policy.
- July 2026: Co-produce a Consultation Strategy with residents and stakeholders.
- September 2026: Launch resident consultation to gather feedback and build consensus.
- January 2027: Develop a draft Under-Occupation Strategy.
- April 2027: Launch the final strategy

**Status** Green





**Recommendation 08** The transition from a committee system of governance to a leader and cabinet model has been well managed with members and officers adjusting to the new discussion and decision-making processes over the last year. The council should consider if further work is needed to ensure opposition parties do not feel excluded from the decision-making process through their inclusion more fully in the overview and scrutiny process.

**CLT Lead** Liz Culbert

**DLT Lead** Anthony Soyinka / Giles Rossington

**Action** Ensure effective Monitoring Officer and Democratic Services support to deliver robust governance arrangements and embed changes to streamline support to the cabinet model of governance.

**Q2 update** This Action relates to the Council Plan Priority to deliver a responsive and learning council with well run services. Additional legal support has been secured to support key projects such as LPS blocks and Housing Disrepair. In this period an external partner has been onboarded to support the backlog of housing disrepair cases. Recruitment is ongoing in relation property legal support for LPS blocks. On 16th October 2025 full Council agreed the Constitution changes to provide additional O&S task & finish groups (within existing resources) which will directly respond to the CPC review where the development of scrutiny was identified as an action. Other changes were agreed to clarify the need for urgency for Special Council meetings, which will ensure these only take place where it is essential. The volume of member questions will be managed through a voluntary agreement by Leaders to only submit 2 questions per member.

**Status** Green

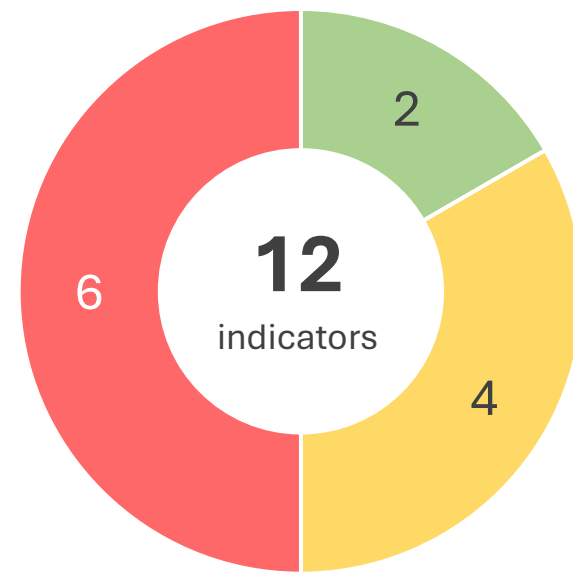
**Action** Provide an effective scrutiny service and develop a sustainable model for scrutiny function within financial constraints

**Q2 update** Full Council approved the changes to Task & Finish Group - which will now be increased to improve the focus of scrutiny to pre decision scrutiny. A Scrutiny report planner is also now in place. There is a budget pressure related to O&S when it transferred teams which is being raised and discussed as part of the overall pressures planning.

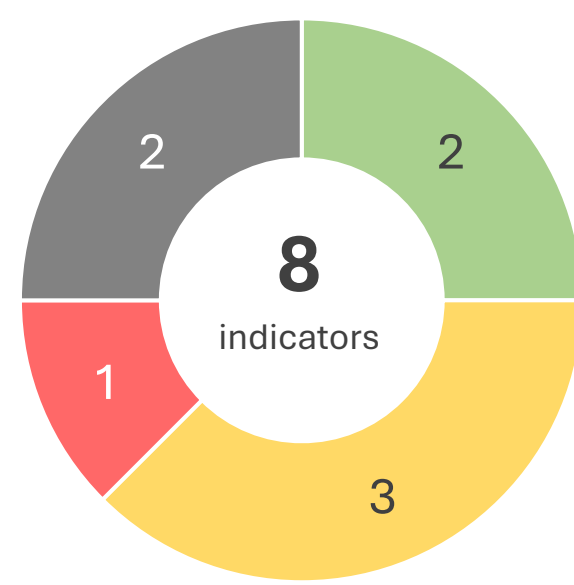
**Status** Green

# Corporate Key Performance Indicators

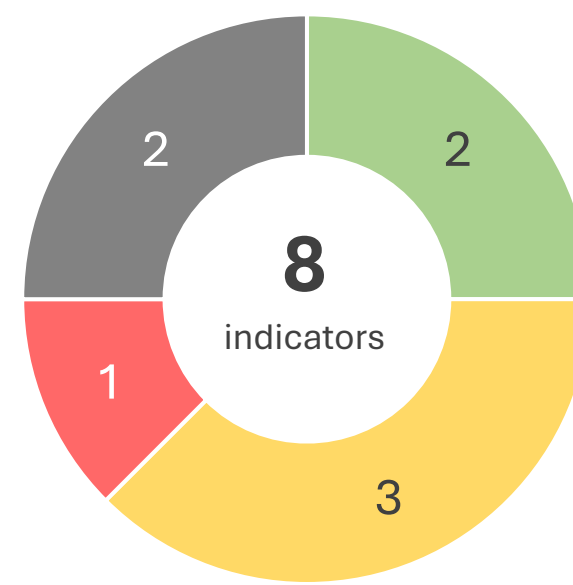
Mid-year results 2025/26



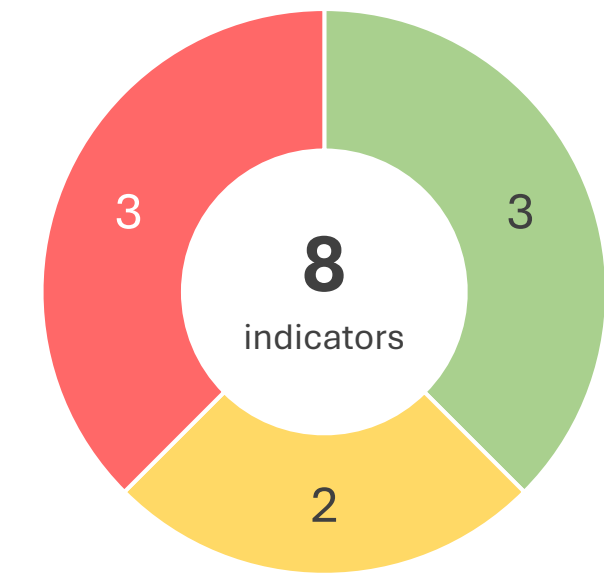
A city to be proud of



A fair and inclusive city



A healthy city where people thrive















A responsive council with well-run services

- 9 (28%) either met, or exceeded their target
- 12 (38%) did not meet their target but are within tolerance
- 11 (34%) were significantly below their target and require further intervention to improve performance
- 4 are monitored to provide trend data

DoT (Direction of travel) indicates if performance is:









↑ Improving / increasing   
 ↓ Worsening / decreasing   
 ↔ No change









Measure	Green target	Amber target	Jun-25	Sep-25	Status	DoT
% major planning application decisions that are overturned at appeal	1.20%	5%	1.61%	3.33%		↓
% non-major planning application decisions that are overturned at appeal	0.90%	5%	0.79%	0.94%		↓
% of major development applications decided within agreed timeframes (24-month)	92.65%	80%	96.30%	95.83%		↓
% of non-major development applications decided within agreed timeframes	89.73%	80%	93.40%	92.99%		↓
Number of attendances at council owned indoor sports facilities	1,797,425	1,617,683	1,798,384	1,777,298		↓
% of household waste sent for reuse, recycling and composting	33.50%	28.50%	26.47%	26.00% <sup>1</sup>		↓
% of streets inspected which are found to have widespread or heavy levels of litter	4.85%	5.50%	6.15%	6.06%		↑
Missed kerbside refuse or recycling collections per 100,000 collections reported	512	622	720	632 <sup>2</sup>		↑
Residual household waste per household	507.76	558.6	605.65	571.43 <sup>1</sup>		↑
Nitrogen Dioxide levels in Brighton and Hove (µg/m3 – micrograms per cubic metre) Lewes Road	32.4	34	34.7 <sup>3</sup>	34.3		↑
Nitrogen Dioxide levels in Brighton and Hove (µg/m3 – micrograms per cubic metre) London Road	33.2	34.9	New KPI	34.3		-
Nitrogen Dioxide levels in Brighton and Hove (µg/m3 – micrograms per cubic metre) North Street	30.5	32	31 <sup>3</sup>	32.2		↓

<sup>1</sup> There is a 3-month lag on waste data. The results shown here relate to the period of April to June 2025









<sup>2</sup> This KPI is under review following the implementation of In-Cab technology which provides more accurate data

<sup>3</sup> This KPI is monitored biannually. The previous result shown is for March 2025

Measure	Green target	Amber target	Jun-25	Sep-25	Status	DoT
% of council owned homes that meet the government's Decent Homes standard	100%	95%	96.94%	97.22%		↑
% of emergency repairs completed within 24 hours	99%	97%	99.14%	98.74%		↓
% of routine council housing repairs completed on time	70%	58%	56.42%	58.56%		↑
Number of private sector homes that have been improved due to council intervention	Baseline		34	70		↑
No. of additional affordable homes delivered by the council (new build, acquisitions & conversions)	110	83	116	144		↑
% of homelessness cases presenting during the prevention duty stage	45.00%	37.24%	35.35%	35.08%		↓
% of homelessness prevention cases closed with a successful prevention outcome	53.40%	52.19%	55.70%	59.94%		↑
Total number of households in temporary accommodation	Trend		2021	2125		↑

Measure	Green target	Amber target	Jun-25	Sep-25	Status	DoT
Number of children in care	Trend		332	359		↑
% of Family Hubs Strengthening Family Assessments completed within timescales	84.50%	78.50%	64.50%	69.60%		↑
% of Social Care Strengthening Family Assessments completed in 45 days	84.50%	78.50%	91.20%	90.90%		↓
% of Education, Health & Care Plans (EHCPs) issued within 20 weeks including exceptions	58.10%	45.30%	60.60%	57.80%		↓
% of those able to express desired outcomes who fully or partially achieved their desired outcomes	83.00%	77.00%	81.86%	87.90%		↑
Number of verified rough sleepers	Trend		36	37		↑
Adults in receipt of community support as a proportion of all adults in receipt of a long-term service	72%	67%	71.62%	71.33%		↓
% of Adults accessing long-term support for 12months+ with a review	45%	33%	40.98%	40.37%		↓

# A responsive and learning council with well-run services

Measure	Green target	Amber target	Jun-25	Sep-25	Status	DoT
Average number of working days / shifts lost per Full Time Equivalent (FTE) due to sickness absence (not including schools)	10.1	11.24	2.46	2.73		↓
Staff who declare that they have a disability as a % of the total workforce who declare whether they have a disability (not including schools)	11.70%	9.36%	9.90% <sup>1</sup>	10.20%		↑
Staff who declare themselves as BME (excludes White Irish and White Other) as a % of the total workforce who declare their ethnicity (not including schools)	12.10%	9.68%	11.90% <sup>1</sup>	12.40%		↑
Staff who declare themselves as White Other as a % of the total workforce who declare their ethnicity (not including schools)	13.10%	10.48%	9.10% <sup>1</sup>	9.40%		↑
% of high priority audit actions recommended by Internal Audit that have reached their due date for completion and have been implemented by services	95%	90%	76.5%	100%		↑
% of rent collected from current tenants of council owned homes	95.92%	94.12%	92.39%	92.79%		↑
Council tax collected as a percentage of council tax due	94.57%	93.62%	95.32%	95.28%		↓
Non-domestic rates collected as percentage non-domestic rates due	97.23%	95.73%	97.42%	93.30%		↓

<sup>1</sup> This KPI is monitored biannually. The previous result shown is for March 2025

# Customer Insight

Mid-year report 2025/26



# Responding to complaints and enquiries as a connected council.

Recent feedback has shown an increasing need to deliver joined up and effective services, particularly when dealing with customer contact.

As an organisation we do not always manage to respond to complaints and enquiries in a timely way, which often leads to increased customer dissatisfaction and escalation to later stages, resulting in more work for the organisation.

Things we can do to improve responses:

- When we first receive a complaint or enquiry, review it and plan in sufficient time to collect information, input from colleagues and write the response. If the complaint has been incorrectly assigned to a team, by reviewing the complaint/ enquiry as soon as we receive it, we can reduce delays in getting the complaint/enquiry to the right place.
- Not all complaints or enquiries have a clear main service who should lead on coordinating and sending the response, in these instances one officer should lead on the response whether the whole complaint or enquiry is for one service or not.
- Do not leave responding to the complaint or enquiry until the last minute, we have found this often leads to a rushed response that doesn't fully address the customers dissatisfaction and can delay the response being sent to the customer if we require additional information or input from another service.
- If we require input from another council service, we must communicate promptly and clearly to allow time for them to provide a considered response and ensure they understand what is required and by when.
- If we have been asked to contribute to a complaint or enquiry response, ensure that we fully understand what is being asked of us and plan time sufficiently so colleagues can respond if required.

## 1,475 stage 1 complaints received

To date since April 2025, we have received 1,475 stage 1 complaints, 67% of the total number of stage 1 complaints received in 2024/25. In quarter 2 we received 771 complaints, a 25% increase when compared with the same period in 2024/25 (619).

## 69.2% responded to within timeframes

1,020 complaints were responded to within timeframes, whilst this is a decline in performance of 5.2% when compared to the same period in 2024/25, we have responded to 176 more complaints within timeframes.

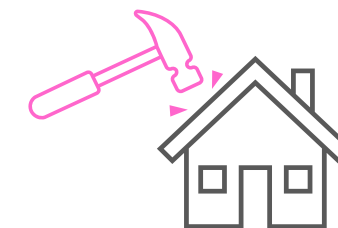
## 50.4% were upheld

The upheld rate is monitored as this can be indicative of underlying issues. However, there is no set target for the upheld rate as we aim to uphold all complaints where fault is found no matter how small. This period saw a 4.2% increase compared to the same period in 2024/25, though no specific service area showed a significant increase.

## Top 5 areas of complaint



Environmental Services  
276 complaints  
93.5% upheld



Housing Repairs  
249 complaints  
57.3% upheld



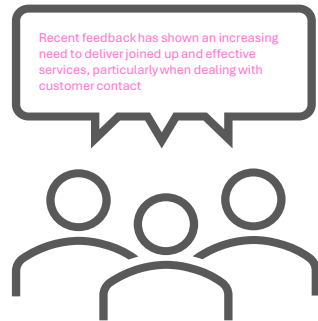
Tenancy Services  
137 complaints  
37.1% upheld



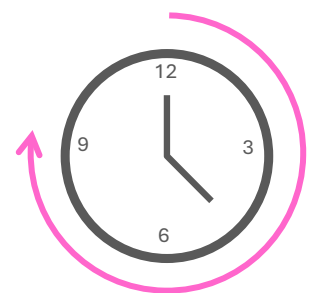
Council Tax  
121 complaints  
29.8% upheld



Homelessness & Housing Options  
93 complaints  
38.4% upheld



Recent feedback has shown an increasing need to deliver joined up and effective services, particularly when dealing with customer contact



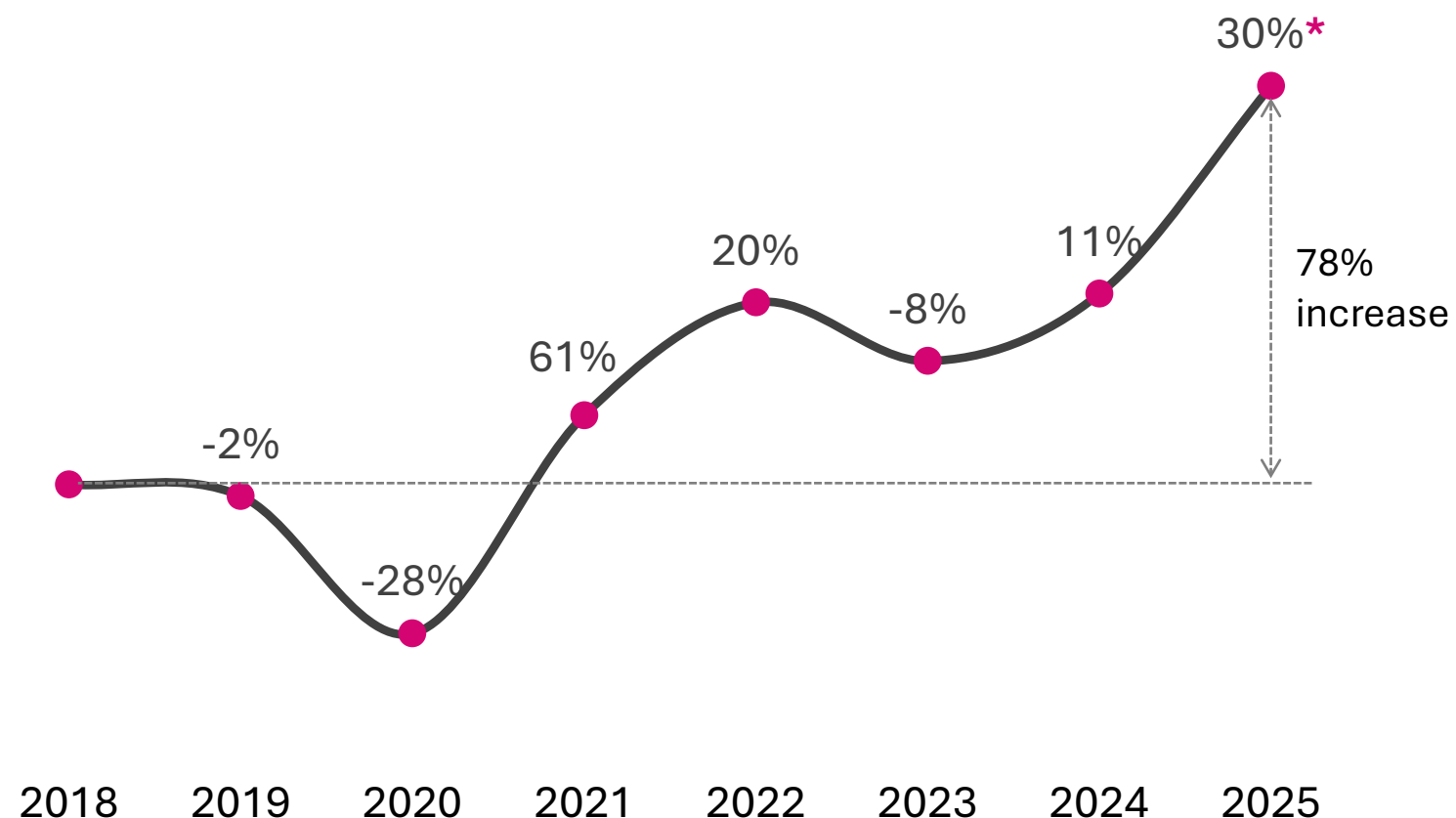
After investigation, if we have found a fault, no matter how small, we will uphold the complaint. Upheld complaints are then used to inform actions, learning or service improvements.

# \*Projected 30% increase in stage 1 complaints

Based on trend data from 2018-2024, we are projecting a 30% (665 complaints) increase in the number of stage 1 complaints received in 2025/26.

Since 2018, we have seen a 78% increase in the number of stage 1 complaints received.

## Year on year complaint volume trend



## Stage 1 complaints by directorate

### Central Teams

139 stage 1 complaints received  
43.9% responded to within target (61/139)  
32.8% of complaints were upheld (46/139)

### City Operations

518 stage 1 complaints received  
80.3% responded to within target (416/518)  
61.4% of complaints were upheld (318/518)

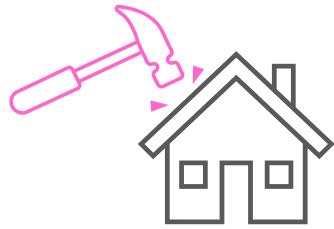
### Families, Children & Wellbeing

148 stage 1 complaints received  
52% responded to within target (77/148)  
44.4% of complaints were upheld (66/148)

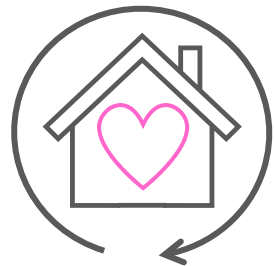
### Homes & Adult Social Care

656 stage 1 complaints received  
69.8% responded to within target (458/656)  
46.2% of complaints were upheld (303/656)

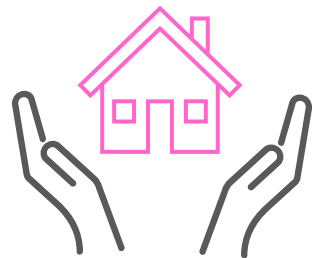
## Highest areas of complaint escalation



Housing Repairs  
42 stage 2 complaints  
16.8% escalation rate



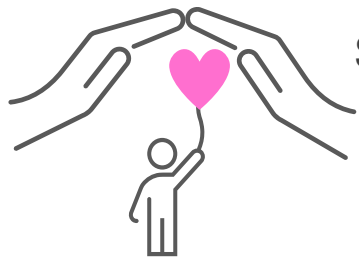
Tenancy Services  
32 stage 2 complaints  
23.3% escalation rate



Homelessness & Housing Options  
27 stage 2 complaints  
29% escalation rate



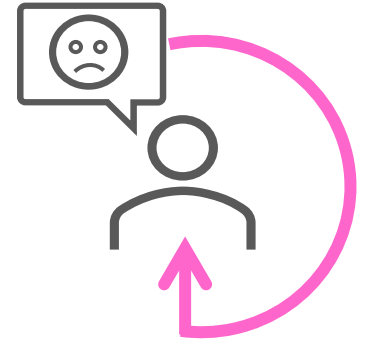
Environmental Services  
26 stage 2 complaints  
9.4% escalation rate



Special Educational Needs  
23 stage 2 complaints  
33.8% escalation rate

## 263 complaints were escalated to stage 2

To date since April 2025, 263 stage 1 complaints have been escalated to stage 2, 76% of the total number of stage 2 complaints received in 2024/25 (342). In quarter 2 alone 149 stage 2 complaints were received, a 62% increase when compared with the same period in 2024/25 (90).



## 40.8% were upheld

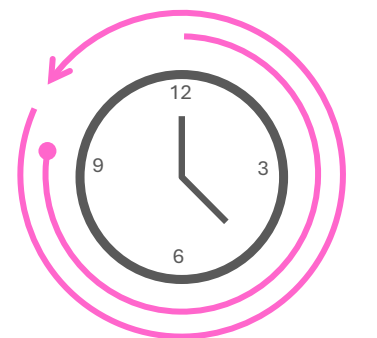
106 stage 2 complaints were upheld or partially upheld. 38 (14.6%) complaints were upheld at stage 2 when the original decision was to not uphold the complaint.

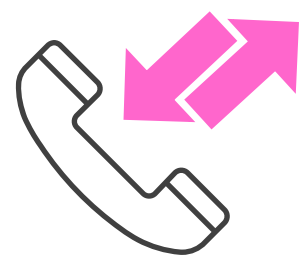


## 79.8% responded to within timeframes

Of the 263 complaints escalated to stage 2, 53 have been responded to outside of timeframes.

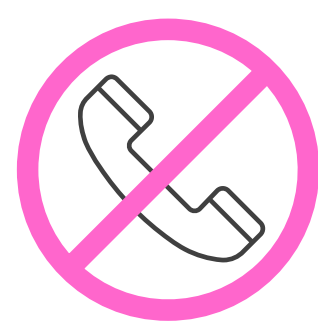
A determination was made on 222 (84.4%) of the complaints escalated to stage 2, with 162 (61.5%) of those requiring a thorough investigation.





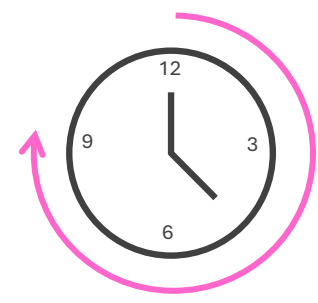
# We received 92,358 phone calls

We monitor 40 external phone lines across the council. 12 phone lines, which consistently receive more than 500 calls per month (high-volume), account for 79% (73,009) of all calls received.



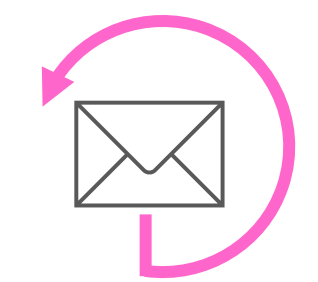
# 13.16% of calls were abandoned in queue

Across all phone lines, 12,150 calls were abandoned whilst the caller queued. High-volume services account for 9,111 of these calls, 12.48% of the calls they received.



# On average we answered the phone in 8m 04s

The average time to answer calls was 8 minutes and 04 seconds across all phone lines. High-volume services answered calls in 9m 01s on average.



# On average we respond to emails within 10 working days

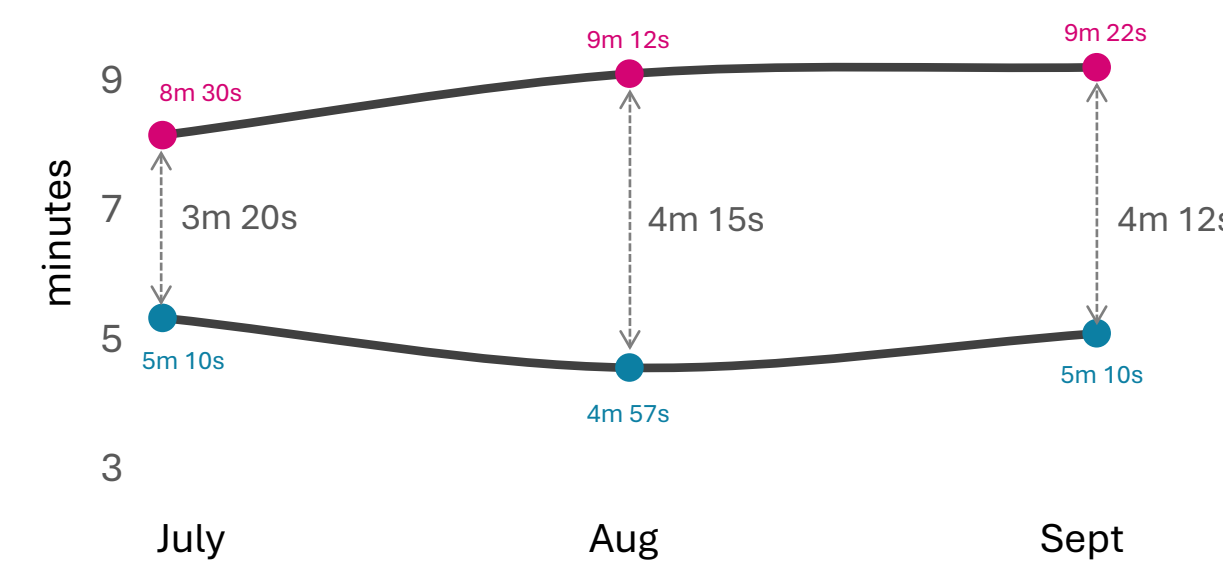
All services responded to emails on average within 10 working days with the exception of Council Tax, Housing Needs: Homemove, Housing Needs: Advice and Housing Customer Services

## High-volume services

	C	T	A
Access Point	1837	09:47	18%
Benefits	2557	08:44	11%
Council Tax	8593	47:48	31%
Environmental Services	5098	04:07	14%
Housing Customer services	5960	03:56	13%
Housing Income Management	3781	01:12	5%
Housing Needs Options	5451	14:13	23%
Housing Repairs	15352	00:59	7%
Parking Customer Services	11093	02:37	7%
Planning & Building Control	1985	04:23	11%
Switchboard	11302	01:30	8%

C = Calls received    A = % abandoned    T = time to answer in minutes

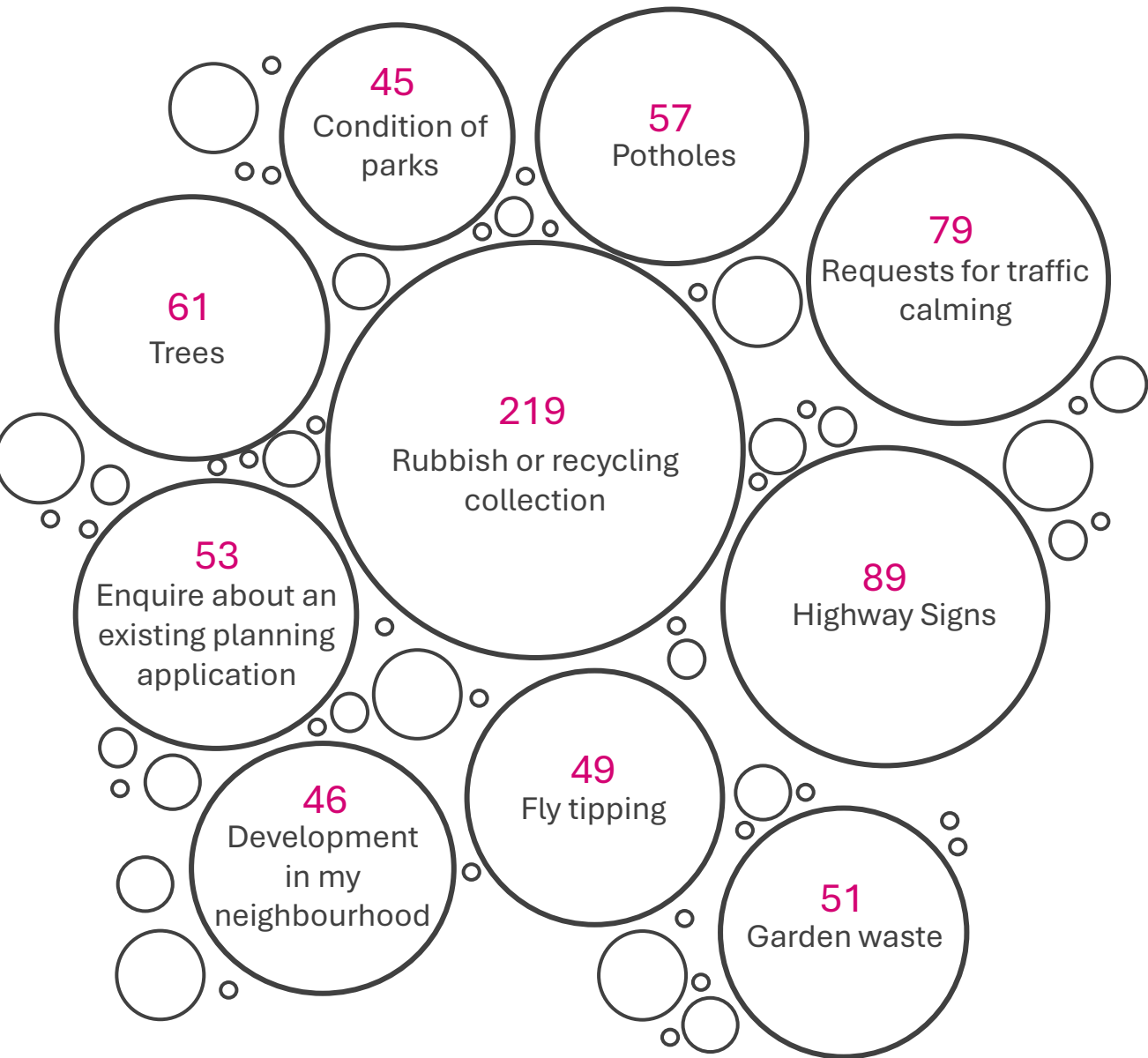
## Avg. abandoned time compared to avg. time to answer



High-volume services avg. time to answer —●—  
Avg. abandoned time for high-volume services —●—



Top reasons for contact



The most common reason for residents to contact their councillor was for Rubbish or recycling collection, accounting for 9.67% of all contact. Together, the top ten reasons for contact make up 38.76% (878 enquiries) of all contact received.

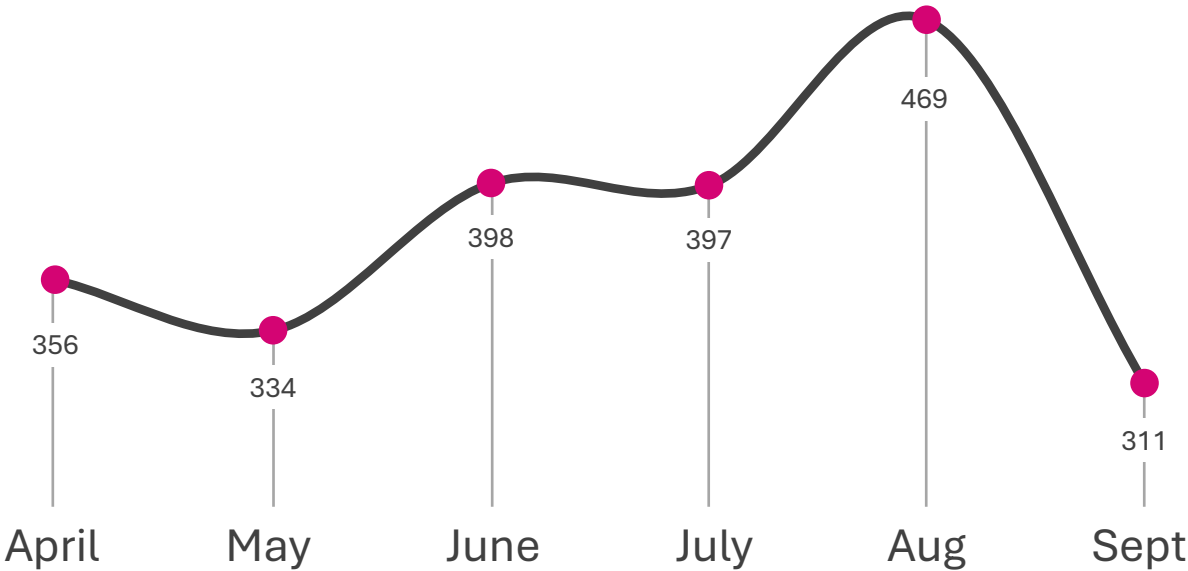
\* A number of enquiries were submitted under “My enquiry is about something else” that have not been included in the above chart.

# 2,265 enquiries were submitted to councillors

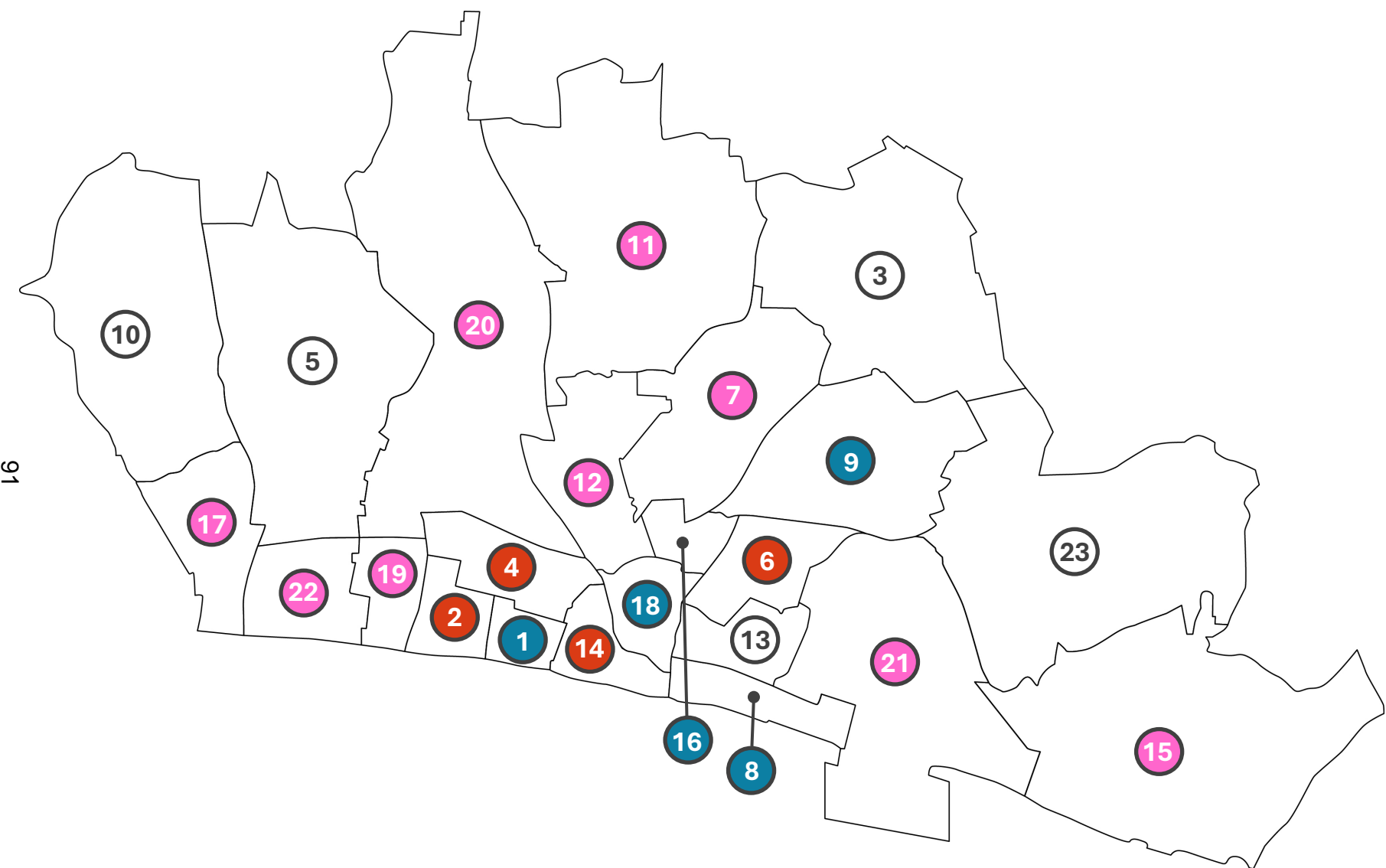
We have seen a 16% increase in the number of enquiries submitted when compared to the same period in 2024 (1952 enquiries submitted).

August saw the highest number of enquiries submitted to councillors since January 2025 (513 enquiries submitted). The top reason for contact in August was to enquire about an existing planning application, with 41 of the 53 enquiries submitted for the 6-month period coming in August.

Enquiries received by month



# Where enquiries came from



Requests related to traffic calming (●) and rubbish or recycling collection (●) represented the most common reasons for contact in 13 of the city’s wards, with traffic calming requests highest in four wards and rubbish or recycling collection requests highest in nine wards.

When viewing reasons for contact under broader categories, planning and development (●) was the most frequent area for contact across 5 of the city’s wards.

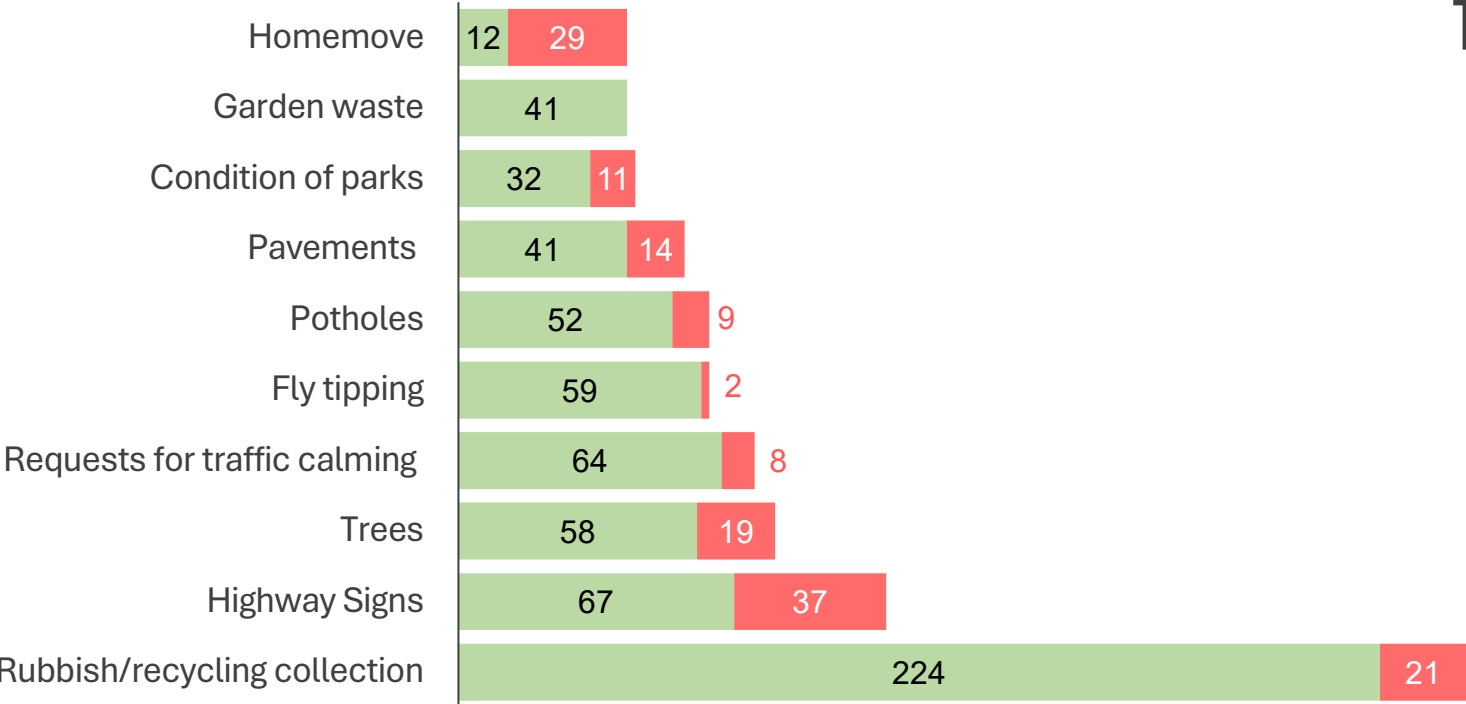
	Ward	Enquiries	Top reason for contact
1	Brunswick & Adelaide	97	Development in my neighbourhood
2	Central Hove	52	Traffic calming
3	Coldean & Stanmer	61	Parking permits
4	Goldsmid	43	Traffic calming
5	Hangleton & Knoll	146	Fly tipping
6	Hanover & Elm Grove	68	Traffic calming
7	Hollingdean & Fiveways	118	Rubbish or recycling collection
8	Kemptown	65	Enquire about an existing planning application
9	Moulsecoomb & Bevendean	87	Enquire about an existing planning application
10	North Portslade	22	Potholes
11	Patcham & Hollingbury	50	Rubbish or recycling collection
12	Preston Park	108	Rubbish or recycling collection
13	Queens Park	46	Anti-social behaviour
14	Regency	83	Traffic calming
15	Rottingdean & West Saltdean	299	Rubbish or recycling collection
16	Roundhill	36	Building regulations
17	South Portslade	37	Rubbish or recycling collection
18	West Hill & North Laine	43	Development in my neighbourhood
19	Westbourne & Poets Corner	80	Rubbish or recycling collection
20	Westdene & Hove Park	270	Rubbish or recycling collection
21	Whitehawk & Marina	48	Rubbish or recycling collection
22	Wish	130	Rubbish or recycling collection
23	Woodingdean	279	Highway signs

# 1,987 requests for a service response

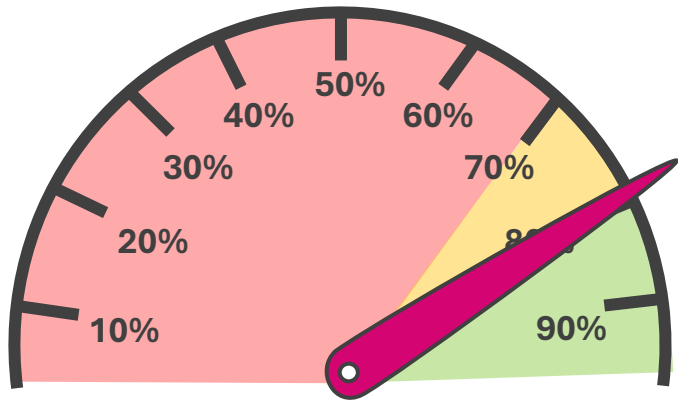
There has been a 2.6% decrease in the number of service requests compared to the same period last year.

The most common reason for councillors to request a service response was for Rubbish or recycling collection, accounting for 12.3% of all requests. Together, the top ten reasons for contact make up 40.2% (800 requests) of all service requests.

## Top 10 reasons for contact

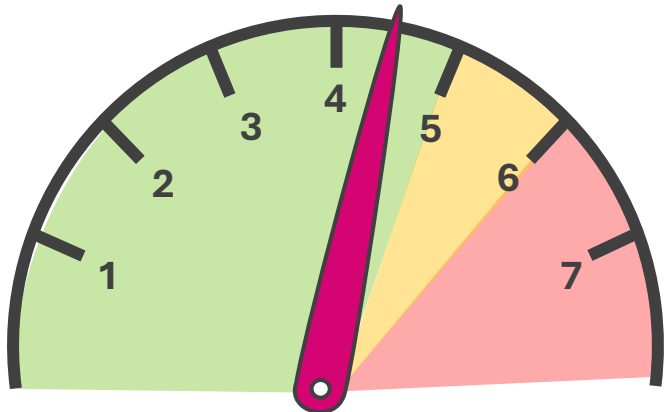


Responded to within 5 working days Responded over within 5 working days



79% of requests were responded to within 5 working days

On average it took 3.92 days for services to provide their response



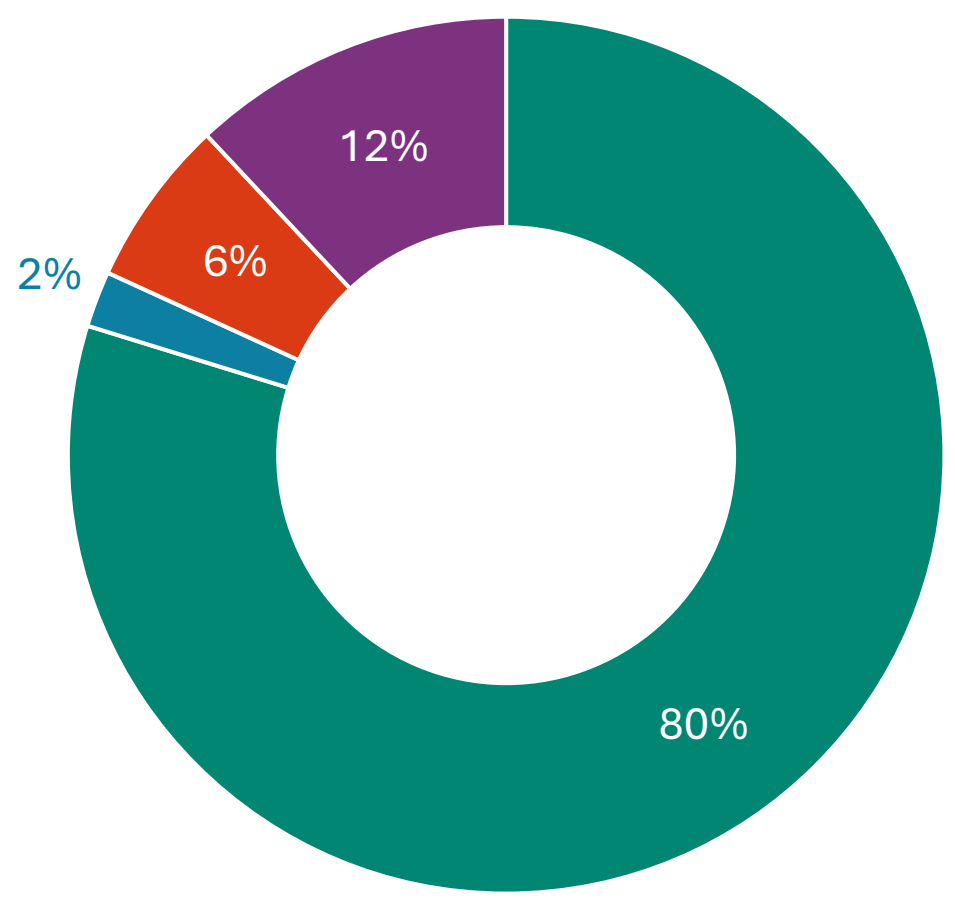
1,570 (79%) requests for a service response were responded to within 5 working days, with an average response time of 3 days and 22 hours.

This is comparable to the same period last year.



# City Operations account for 80% of all requests for a service response

Overall, the volume of requests for Central Teams, City Operations and Families, Children & Wellbeing are consistent with the same period last year, however, there has been a significant decrease in requests to Homes & Adult Social Care (324 in 2024/25)



## Councillor enquiries service requests by directorate

- ### Central Teams

123 requests for a service response  
91% responded to within 5 working days (112/123)  
On average it took 3.29 days to respond
- ### City Operations

1,585 requests for a service response  
82% responded to within 5 working days (1300/1585)  
On average it took 4.18 days to respond
- ### Families, Children & Wellbeing

41 requests for a service response  
78% responded to within 5 working days (32/41)  
On average it took 5.05 days to respond
- ### Homes & Adult Social Care

238 requests for a service response  
62.6% responded to within 5 working days (149/238)  
On average it took 6.96 days to respond

# Other elements of Performance Management Framework

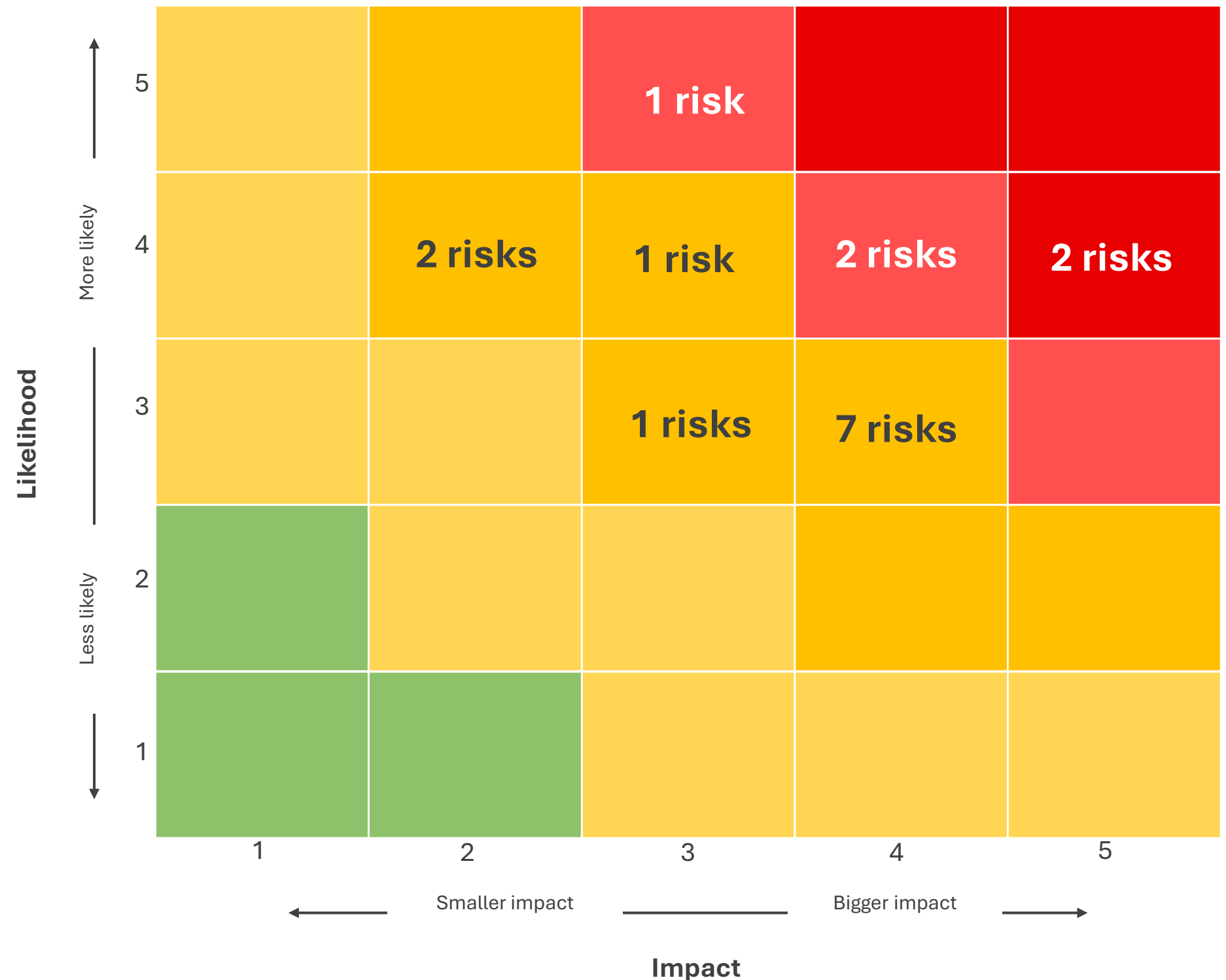
Mid-year report 2025/26

# Strategic Risk Register

Strategic risks refer to those considered to significantly impact the council's ability to meet the goals outlined in the council plan, or to impact several directorates, partners, or the city as a whole.

Strategic risks are managed by the Corporate Leadership Team with oversight from Cabinet and Audit, Standards & General Purposes Committee.

Five of the sixteen risks currently on the strategic risk register are considered to have a high level of risk exposure.



SR02	Risk title	Risk Owner	Current score	Target score
	Failure to develop and deliver a Medium-term financial plan (MTFP) to ensure financial sustainability and resilience	Director Property & Finance	20	16
Summary description				
Central government funding reductions and changes to local government funding have increased financial risks. Rising costs in social care, homelessness, inflation, and cost of living are major concerns and are growing significantly in Brighton and Hove.				
Our level of reserves has increased slightly following 24/25 outturn, but we still have one of the lowest levels of reserves in the country which is a major concern.				
Management controls		Oversight	Assurance	
The Council implements spending controls to address financial challenges, with the Savings Delivery Board overseeing efforts to reduce costs in key areas like temporary accommodation, social care placements, and transport. Directorate Leadership Teams are developing recovery plans to address reported overspend. Financial forecasts are regularly updated through the Medium-Term Financial Strategy, which includes taxbase, demographic, and cost changes, and identifies budget gaps early. Key measures include annual budget approvals, RAG-rated budget monitoring for overspending, and Cabinet-approved plans for capital receipts and transformation to meet financial targets.		Financial sustainability is supported by regular monitoring and review by the Corporate Leadership Team (CLT) and Cabinet of MTFS assumptions, including the impact of legislative changes, cost and demand pressures, savings programmes, and income, taxation, and grant assumptions. This monitoring is conducted through TBM reporting and various budget reports. Additional oversight is provided by the Capital Programme Board and the Savings Delivery Board, which focus on the delivery of savings and capital projects.	Assurance is provided through annual VfM reviews by the External Auditor, with the 2023/24 assessment highlighting major financial sustainability issues and resulting in one key and four improvement recommendations. Internal Audit regularly reviews financial management, governance, and reporting, reporting findings to the Audit, Standards & General Purposes Committee, which monitors the Audit Plan annually and receives updates on limited assurance audits. The LGA Corporate Peer Challenge in 2025 will further assess the Council’s financial management and sustainability.	
Mitigation actions				
Develop the Medium Term Financial Strategy, capital programme and transformation programme to enable the council to deliver on its priorities and address its longer-term financial pressures in a structured way.				
Develop and deliver a temporary accommodation acquisition strategy				
Approve balanced budget and capital programme in February, with plans to address reserves or working balance needs				
Develop a strategy to rebuild reserves and establish a stronger financial position				
Develop savings proposals aligned with Council Plan priorities and budget categorization				
Strengthen financial controls and oversight of in-year budget management to achieve the required savings				

SR10	Risk title	Risk Owner	Current score	Target score
	Failure to adequately protect information assets from a successful cyber-attack impacting our ability to deliver a responsive council with well-run services	Corporate Director City Operations	16	12
Summary description				
BHCC faces significant cyber risks due to its extensive digital assets, including business systems and emails. Threats come from various actors, such as employees, cyber criminals, hackers, and foreign states, as well as accidental data loss or publication.				
The growing volume of information and sophisticated cyber threats require advanced cybersecurity, Information Governance, and Information Management strategies.				
Post-pandemic working methods increase these vulnerabilities and make recovery efforts more challenging.				
Management controls		Oversight	Assurance	
Technical controls include firewalls, hard drive protection, strong password policies, secure hosting, and regular patching. Annual health checks and penetration tests are conducted, and the council is a member of the South East WARP for threat intelligence. Incident management processes are in place, and procurement is reviewed for compliance. Behavioural controls include mandatory training, published guidance, and privacy impact assessments. Recovery controls feature documented incident processes, data backups, and shared expertise.		The Information Governance Board (IGB) leads on information risk, with regular policy reviews and risk register updates. The Senior Information Risk Owner (SIRO) and Caldicott Guardians provide specialist oversight, and the Audit and Standards Committee reviews governance. A Data Protection Officer supports compliance.	Internal Audit reviews from 2021 to 2024 covered IT procurement, security, and data handling, with most areas receiving reasonable or substantial assurance; PCI/DSS and accessibility received partial assurance. Annual IT Health Checks by approved providers assess both applications and infrastructure. The organization maintains ongoing compliance with PSN CoCo, NHS Digital Data Security and Protection Toolkit, and PCI DSS.	
Mitigation actions				
Review the council's information governance vulnerabilities and cyber risks, and develop an action plan to reset and strengthen policy and processes to better manage the risks				
Prevention - Technical Controls: Improve the Council’s Information Risk Management process maturity. This will include elevating the visibility of the risk register, implementing technical solutions to improve information asset management and publicizing clear processes and guidance.				
Prevention - Technical Controls: Review and improve user access controls (network and application access rights for starters, leaver and movers) via the Access Management project				

SR13	Risk title	Risk Owner	Current score	Target score
	Failure to ensure effective safeguarding arrangements to keep adults safe	Corporate Director Homes & Adult Social Care	16	12
Summary description				
<p>The council has a duty to keep adults, for whom they have statutory responsibility for, safe from harm and abuse. Brighton &amp; Hove City Council has a statutory duty to co-ordinate safeguarding work across the city and the Safeguarding Adults Board. This work links partnerships across the Police and Health and Social Care providers.</p> <p>Under the Care Act, since 2015, the Local Authority has a statutory duty to enquire, or cause others to enquire, if it believes a person with care and support needs is experiencing or is at risk of harm and abuse and cannot protect themselves.</p>				
Management controls		Oversight	Assurance	
Performance management and data dashboards support adult social care planning, overseen by the Finance & Performance Board. Self-assessment and improvement plans are in place, with multi-agency procedures and dedicated safeguarding resources. Panels and steering groups support practice development, and referrals are assessed by social workers. Quality monitoring is conducted in partnership with the NHS and CQC.		Pan Sussex Safeguarding Adults procedures group and various boards provide multi-agency oversight, including the Health & Wellbeing Board and Care Governance Board.	<p>All local authority adult social care services receive regular CQC inspections from 2023, with published results for all registered providers.</p> <p>The Brighton &amp; Hove Safeguarding Adults Board, independently chaired, meets quarterly with statutory agencies to ensure city-wide assurance.</p> <p>The Safeguarding Lead serves on the SAR panel for detailed multi-agency reviews.</p> <p>The Local Government Association Test of Assurance (2022) made recommendations, reviewed in 2023.</p> <p>Internal Audits (2021–2024) covered data handling, financial assessments, direct payments, home care, and modernisation programmes, providing reasonable or partial assurance.</p>	
Mitigation actions				
Together with statutory partners of the SAB achieve the strategic priorities, contribute to all Safeguarding Adults Reviews (SAR), meaningful learning from SAR activities and influence change. Bring learning closer to front line safeguarding practice				
Develop and deliver the Homelessness and Rough Sleeping Strategy with a focus on adults with multiple compound needs				
Ensure that mandatory PREVENT training is embedded in all training induction and development plans within the organisation to support effective identifiers and that the referral pathway is known				
Provide assurance that there is a comprehensive clear Disclosure and Barring Service (DBS) check and recheck process in place which reduces risk to the organisation and to the community				



SR15	Risk title	Risk Owner	Current score	Target score
	Failure to ensure effective safeguarding arrangements to keep children and young people safe from harm and neglect	Corporate Director Families, Children & Wellbeing	16	12
Summary description				
<p>The Council has a legal responsibility to protect vulnerable children from harm and neglect, following national guidance. The Brighton &amp; Hove Safeguarding Children Partnership was established in 2019 to ensure an effective multi-agency safeguarding response.</p> <p>The complexity of circumstances for many children presents a constant state of risk which demands informed and reflective professional judgement, and often urgent and decisive action, by all agencies using agreed thresholds and procedures. Such complexity inevitably presents a high degree of risk. Children subject to harm, exploitation and/or neglect are unlikely to achieve and maintain a satisfactory level of health or development, or their health and development will be significantly impaired. In some circumstances, harm and neglect may lead to a child's death.</p>				
Management controls		Oversight	Assurance	
A robust quality assurance framework is in place, with a single point of access for safeguarding issues. Multi-agency partnerships, regular reviews, and family support hubs are established. Continuous professional development and Prevent strategy work are ongoing, with risk meetings for vulnerable adolescents.		Family Help Partnership Board, multi-agency quality assurance, Corporate Parenting Board, and annual practice weeks provide oversight. A dedicated coordinator reports on vulnerability and exploitation.	Children’s services have received strong external and internal validation, with Ofsted rating the service Outstanding in March 2024 and confirming positive assurance for SEND and Alternative Provision alongside the CQC in March 2023. Ongoing annual engagement with Ofsted HMI for social care and education, independent scrutiny commissioned by the BHSCP, and internal audits from 2022 to 2025, which gave reasonable or substantial assurance for key areas, further support the robust assurance framework in place.	
Mitigation actions				
Deliver a robust and improving family help and protection service that keeps children safe, providing the right support at the right time to families in need.				
Deliver the Families First transformation programme, as mandated by the Department for Education				
Deliver the Starting Well Family Hub transformation in line with Department for Education requirements by April 2026				
Provide assurance that there is a comprehensive clear Disclosure and Barring Service (DBS) check and recheck process in place which reduces risk to the organisation and to the community				
Ensure that mandatory PREVENT training is embedded in all training induction and development plans within the organisation to support effective identifiers and that the referral pathway is known				

SR18	Risk title	Risk Owner	Current score	Target score
	Failure to invest in and maximise use of digital technology to enable a responsive council with well-run services	Corporate Director City Operations	16	12
Summary description				
The organisation faces significant risks due to its reliance on technology for service delivery. Without continuous financial investment to keep up with technological advancements, there is a danger of service disruption resulting from technology failures. Key investment areas include foundational technology, end-user technology, business applications, digital transformation, and enhancing the tech competencies of leadership and staff. These investments are crucial to maintaining a secure infrastructure, providing appropriate devices and systems, ensuring service effectiveness, enabling modernization, and recognizing opportunities offered by technology.				
Management controls		Oversight	Assurance	
Annual capital investment is allocated for foundational and end-user IT through structured programmes overseen by the Corporate Leadership Team (CLT). Investments have delivered secure data centre storage, platform migrations, enhanced remote working, and widespread device upgrades. Major business applications, such as the Eclipse social work system and housing management system, have received targeted funding. The Digital Customer programme has sponsored digital transformation projects, including web migration and customer-facing apps. Leadership development is supported through the Leadership Network.		The Corporate Leadership Team (CLT) ensures alignment of digital projects with Council Plan objectives and reviews staff survey indicators on access to technology. The Tech & Digital Board monitors progress and strategic IT changes, while external assurance is provided for Microsoft 365.	Internal Audit reviews (2023/24: Surveillance Cameras follow-up, Robotic Process Automation, ERP and housing systems, PCI/DSS; 2022/23: Housing Management System, Accessibility Regulations; 2021/22: MCM Housing Repairs Application, Accessibility Regulations) provided reasonable or partial assurance.  Audit have provided advice for the Corporate Systems Improvement and housing system programme boards.  External assurance for Microsoft 365 by Silversands.	
Mitigation actions				
Align the priorities and actions of the Digital, Data and Technology portfolio to support the delivery of the council plan priorities and support in the modernisation of service delivery				
Investment in ‘end user’ technology - Foundational IT Programme: Strategic Telephony Review				
Turbo charge innovation through a series of technology pilots to drive service efficiencies and savings across the council and produce execution plans for 2026/27				



SR21	Risk title	Risk Owner	Current score	Target score
	Failure to optimise council housing stock, make best use of available housing in the city and deliver new affordable homes	Corporate Director Homes & Adult Social Care	16	12
Summary description				
The increasing demand for housing continues to outstrip new supply and as a consequence accommodation is becoming less affordable. Housing shortages are particularly acute for low-income households, affecting our ability to retain essential workers and families in the city. Demand for affordable rented homes is growing with a significant number of households in temporary accommodation. The private rented sector is currently contracting, increasing opportunities to increase our supply.				
Management controls		Oversight	Assurance	
The City Plan sets housing targets and policies for affordable housing, with the Housing Strategy action plan and Housing Allocation Policy approved by Cabinet. The Homelessness & Rough Sleeping Strategy is updated regularly, and working groups focus on bringing empty homes back into use. Asset management prioritises land release for affordable housing.		The Housing Supply Programme Board and Homes for Brighton & Hove Partnership Board monitor delivery, with key actions tracked through KPIs and the Capital Programme Board.	Internal Audit reviews (2024/25: Housing Major and Planned Works Programme, Housing Rents, Home Purchase Scheme; 2023/24: Housing Rents follow-up, Temporary Accommodation, Allocations; 2022/23: Housing Management System) provided partial or reasonable assurance.  Quarterly returns to the Ministry of Housing, Communities and Local Government on homelessness and rough sleeping.  Homes England monitors grant-funded schemes, with regular updates and drawdowns.	
Mitigation actions				
Build new council homes to meet the number of homes required in the city.				
Create new social housing lets by reducing under occupancy to make best use of available housing in the city.				
Implement the new Housing Strategy to deliver accessible, affordable and high-quality homes for everyone in Brighton & Hove.				
Increase housing supply of new and affordable homes to meet the needs of current and future residents.				

SR24	Risk title	Risk Owner	Current score	Target score
	Failure to provide an equitable approach to ensure equality of access, outcomes and experiences for all	Director People & Innovation	12	9
Summary description				
<p>The Public Sector Equality Duty (PSED, or “the duty”), which applies in Great Britain (England, Scotland and Wales), requires public authorities to have due regard to certain equality considerations when exercising their functions, like making decisions.</p> <p>There is a risk that the council fails to implement an equitable approach that ensures all individuals, regardless of background, characteristics, or circumstances, have fair access to services, opportunities, and positive experiences. This may include disparities in how resources are distributed, how decisions are made, or how individuals are supported, leading to unequal outcomes and experiences across different groups.</p>				
Management controls		Oversight	Assurance	
The Local Discretionary Social Fund (LDSF) and Community Hub provide emergency support, with strong links to the voluntary sector and multi-agency meetings to coordinate welfare responses. Council Tax Reduction awards and Welfare Rights casework support those most affected by welfare changes. The Corporate Debt Policy ensures ethical collection, and discretionary funding streams are closely monitored. In addition, oversight and improvement are further supported by the Directorate Equalities Delivery Group, provision of support and guidance for services on Equalities, Diversity & Inclusion, and the implementation of the Fair and Inclusive Action Plan.		The Corporate Equality Delivery Group, Cabinet, and Audit, Standards & General Purposes Committee oversee equality and welfare initiatives, including delivery of the Accessible City Strategy and the Anti-Racist Strategy. The Corporate Leadership Plan monitors three key actions on equality, diversity and inclusion, while workforce profile is tracked through as a key corporate performance indicator.	Internal Audit reviews (2023/24: Risk Management Actions; 2021/22: Welfare Discretionary Funding, Housing and Council Tax Benefits, Council Tax) provided substantial or reasonable assurance.  The Department for Work & Pensions oversees the Household Support Fund.  MHCLG and BEIS oversee energy and discretionary funds.	
Mitigation actions				
Continually review food insecurity and health implications via the Food Insecurity Group.				
Enable cross council and city collaboration to address poverty				
Deliver the Thriving Communities Investment Fund in support of the CVS across the City				
Automate the EIA process to ensure robust and consistent practice across the council				
Secure our re-accreditation as a City of Sanctuary and implement the associated Action Plan				

SR25	Risk title	Risk Owner	Current score	Target score
	Failure to use the council’s resources and capabilities to deliver the Council Plan and adapt to the evolving needs of the city	Director People & Innovation	25	20
Summary description				
A combination of factors such as lack of governance, strategic direction, and budget pressures, coupled with increasing service demand, the need for new technological skills, challenging industrial relations, and difficulties in retaining and recruiting skilled staff, all contribute to the risk of failing to deliver essential changes and services. This could negatively impact statutory duties, increase staff stress and sickness, and reduce the overall resilience and agility of the organization.				
Management controls		Oversight	Assurance	
The council manages resources and capacity to deliver its plan by ensuring robust decision-making during the budget process, providing funding for transformation programmes, and strengthening leadership through performance management and development programmes. Staff feedback is regularly reviewed, with actions agreed and monitored. Business planning identifies priorities and assigns responsibility, while HR collaborates with directorates to monitor workforce data and address capacity issues. Comprehensive wellbeing initiatives are offered, and there is a dedicated role to manage trade union relations.		The Corporate Leadership Team (CLT) provides oversight of governance arrangements and, alongside Directorate Leadership Teams (DLT), manages a portfolio of transformation programmes such as Digital, Data & Technology, Workspace Innovation, and People and Culture Change programmes. These include initiatives like the “Our People Promise” and efforts to promote a fair and inclusive workplace. Collaboration is further strengthened through joint working with the City Management Board, and the Cabinet has oversight of key policy priorities.	Local Government Association Corporate Peer Challenge in 2025 with a focus on Culture, Leadership and Industrial Relations. Internal Audit reviews in 2023/24 (Organisational Capacity – Workforce Strategy and Management, Performance Development Plans and 1:1s), 2021/22 (Agency Staff Contract), 2020/21 (Recruitment, Working Time Directive), and 2018/19 (Personal Service Companies, Wellbeing Project) provided reasonable or substantial assurance on workforce and management processes.	
Mitigation actions				
Devise a pipeline of potential technology pilots that can drive service efficiencies and savings using innovative tech; execute as directed by CLT; and produce candidate savings and execution plans for 2026/27				
Deliver Our People Strategy to ensure the council has the diverse workforce needed to deliver council plan priorities, statutory and essential functions within our Learning Organisation framework				
Deliver a culture change programme to align culture with the council's missions and priorities				
Build organisational capacity by equipping staff with critical skills aligned with the council's transformation and innovation goals and strategic priorities.				

SR29	Risk title		Risk Owner	Current score	Target score
	Failure to manage contracts to ensure value for money and achieve the best outcomes for the city		Director Property & Finance	20	16
Summary description					
Ineffective procurement activity, contract management and contract performance oversight may lead to sub-optimal service outcomes, financial irregularity and losses, non-compliance with the Procurement Act 2023 and reputational damage.					
Management controls		Oversight	Assurance		
Contract Standing Orders, a Contract Management Framework, and a suite of tools and templates guide procurement and contract management. Staff receive procurement and fraud awareness training, and a supplier code of conduct is in place.		Major contracts are reviewed in a forward plan by CLT, with internal audit findings presented to the Audit, Standards & General Purposes Committee. A Contract Performance Hub is in development.	Internal Audit reports (2024/25: findings on contract management across four non-opinion pieces, three partial opinion reviews, and school audits) highlighted areas for improvement.  Statutory regulatory control for contracts over £5m, with annual performance indicator reviews and public reporting.  Annual external audit reviews the Council’s value for money arrangements.		
Mitigation actions					
Maintain the Contract Management Framework, including changes required by new procurement regulations, compliance with standing orders and implement improved oversight over contract management across the council.					
Introduce a new way of managing and monitoring contract in Brighton and Hove to improve standards and increase visibility of contract performance and risk.					
Review third party spend across the organisation and develop strategies to ensure value for money.					

SR38	Risk title	Risk Owner	Current score	Target score
	Failure to take effective action to increase our city’s resilience to climate change, improve biodiversity and transition to net zero	Corporate Director City Operations	20	15
Summary description				
The climate is changing due to man-made greenhouse gas emissions. Climate change will bring costly and potentially catastrophic impacts to Brighton & Hove’s infrastructure, communities, economy, natural environment and quality of life over the next decades. The timing and intensity of these risks is unpredictable but inevitable.				
Management controls		Oversight	Assurance	
The Carbon Neutral Programme and annual progress reports track climate action across multiple domains. Updated plans for climate and nature action, flood risk, fuel poverty, and decarbonisation are in place. The council manages significant downland for biodiversity and water protection and delivers infrastructure through planning and partnership schemes.		Cabinet leads for transport and net zero oversee relevant functions, with the Living Coast Biosphere Delivery Board managing the biosphere strategy. The Sustainability Checklist and Local Transport Plan support decision-making.	The Environment Agency receives monthly reports on flood risk spending and monitors schemes such as coastal protection and sustainable drainage.  Local Air Quality Management reports are regularly submitted to Defra.  Internal Audit reviewed the Carbon Reduction Programme (2023/24), providing reasonable assurance.	
Mitigation actions				
Enhance and preserve the city's parks, trees and green spaces to keep them safe and attractive for residents and visitors and increase biodiversity.				
Increase resilience of the city for Surface Water Flooding, Ground Water Flooding and the impact of climate change				
Implement the objectives of the City Downland Estate Plan (CDEP) to protect and enhance the land for future generations.				
Develop the Fleet Strategy and deliver fleet replacement plan to ensure sustainable service delivery				
Develop a new programme to address the climate and biodiversity emergencies and help the city transition to carbon net zero.				

SR39	Risk title	Risk Owner	Current score	Target score
	Failure to maintain and demonstrate the building and fire safety of council homes	Corporate Director Homes & Adult Social Care	25	20
Summary description				
As a landlord, it's important that the housing we provide to our residents is safe and free from any hazards, including: building safety, fire safety, gas safety, electrical safety, water safety, lift safety and asbestos. Failure to maintain our council homes to the required standards or provide evidence of our compliance with regulations could have significant impacts on the health and wellbeing of our residents.				
Management controls		Oversight	Assurance	
Dedicated workstreams address fire, water, asbestos, electrical, gas, lifts, and building safety. The Housing Safety and Quality Assurance Group and Housing Compliance Board oversee compliance, with regular risk assessment reviews.		Weekly, monthly, and biannual update reports are provided to leadership, Cabinet, and committees, with regular scrutiny by the Place Overview & Scrutiny Committee.  The Corporate health, safety and wellbeing Board oversee health & safety compliance.	Monthly meetings are held with the Regulator of Social Housing, including sharing of performance trackers.  Internal Audit Position Statement on Housing Health and Safety Regulations (2024/25, January 2025).	
Mitigation actions				
Deliver Planned and Major Works Capital Programmes to ensure our housing assets are maintained, improved and kept in a good state of repair.				
Invest in building and fire safety to meet duties under the Building Safety Act and new Fire Safety (England) Regulations and ensure we are compliant with Health & Safety.				
Embed the new Health & Safety oversight arrangements to monitor compliance and drive improvements of health, safety and wellbeing performance and practice across the council				
Review the approach to collection, recording, review and use of stock condition information to ensure full compliance with Regulator of Social Housing Consumer Standard requirements by 30th April 2025				



SR40	Risk title	Risk Owner	Current score	Target score
	Failure to maintain a clean and safe city	Corporate Director City Operations	16	12
Summary description				
Inability to maintain the city streets - cleanliness, pavements, roads, weeds, etc. will impact the look and feel of the city and people's experience. This will directly impact the reputation of the city, and council, potentially impacting the level of investment, tourism, funding etc. Something about roads, pavements etc.				
Management controls		Oversight	Assurance	
The Highway Asset Management Plan, City Environment Improvement Programme Board, and service budget monitoring ensure prioritised spending. Transformation programmes and cross-council groups manage events and environmental improvements.		Progress on delivery of plans is reported to CLT and Members, with KPIs monitoring waste, recycling, and road conditions. The Capital Programme Board and Safety Advisory Group provide further oversight.	External groups such as the Local Authorities Events Organisers Group and DfT monitor key programmes, with the Independent Seafront Development Board overseeing seafront development.	
Mitigation actions				
Deliver the City Environmental Improvement Programme to develop a sustainable, efficient waste management service with a focus on minimising waste and keeping the city clean and attractive.				
Lead the city’s major regeneration portfolio to protect and enhance the environment and attract investment				
Develop and launch a new City Transport Plan setting out a long-term vision for the city’s transport network including a better connected network integrating the different modes of transport				
Continue to develop and enhance the Highway Asset Management Framework to manage asset condition, deliver planned maintenance programmes and improve public safety on the highway.				
Commission single homelessness and rough sleeper supported accommodation to provide support for people to transition towards independent living.				

SR41	Risk title	Risk Owner	Current score	Target score
	Failure to maintain and demonstrate the health & safety compliance and fire safety of the council's commercial property	Director Property & Finance	16	12
Summary description				
As a landlord, it's important that the commercial property we provide is safe and free from any hazards, including: building safety, fire safety, gas safety, electrical safety, water safety, lift safety and asbestos. Failure to maintain our property to the required standards or provide evidence of our compliance with regulations could have significant impacts on the health and wellbeing of tenants and users using our properties.				
Management controls		Oversight	Assurance	
Managing agents collect compliance data, with monthly meetings and dashboards. Project boards and new contract management processes are in place for key properties.		Regular reports are made to Directorate and Corporate Leadership Teams, with a Health & Safety Advisory Board in place.  The Corporate health, safety and wellbeing Board oversee health & safety compliance.	An internal audit is planned for 2025/26 to review compliance arrangements.	
Mitigation actions				
Develop and establish KPI reporting process within contracts to ensure value for money and assurance over compliance				
Develop and deliver a communication campaign on health & safety requirements and responsibilities for current tenants				
Develop a welcome pack from new tenants outlining their responsibilities with regards to health & safety including details on how to provide compliance data				
Strengthen governance arrangements to improve oversight and decision-making within projects				
Embed the new Health & Safety oversight arrangements to monitor compliance and drive improvements of health, safety and wellbeing performance and practice across the council				

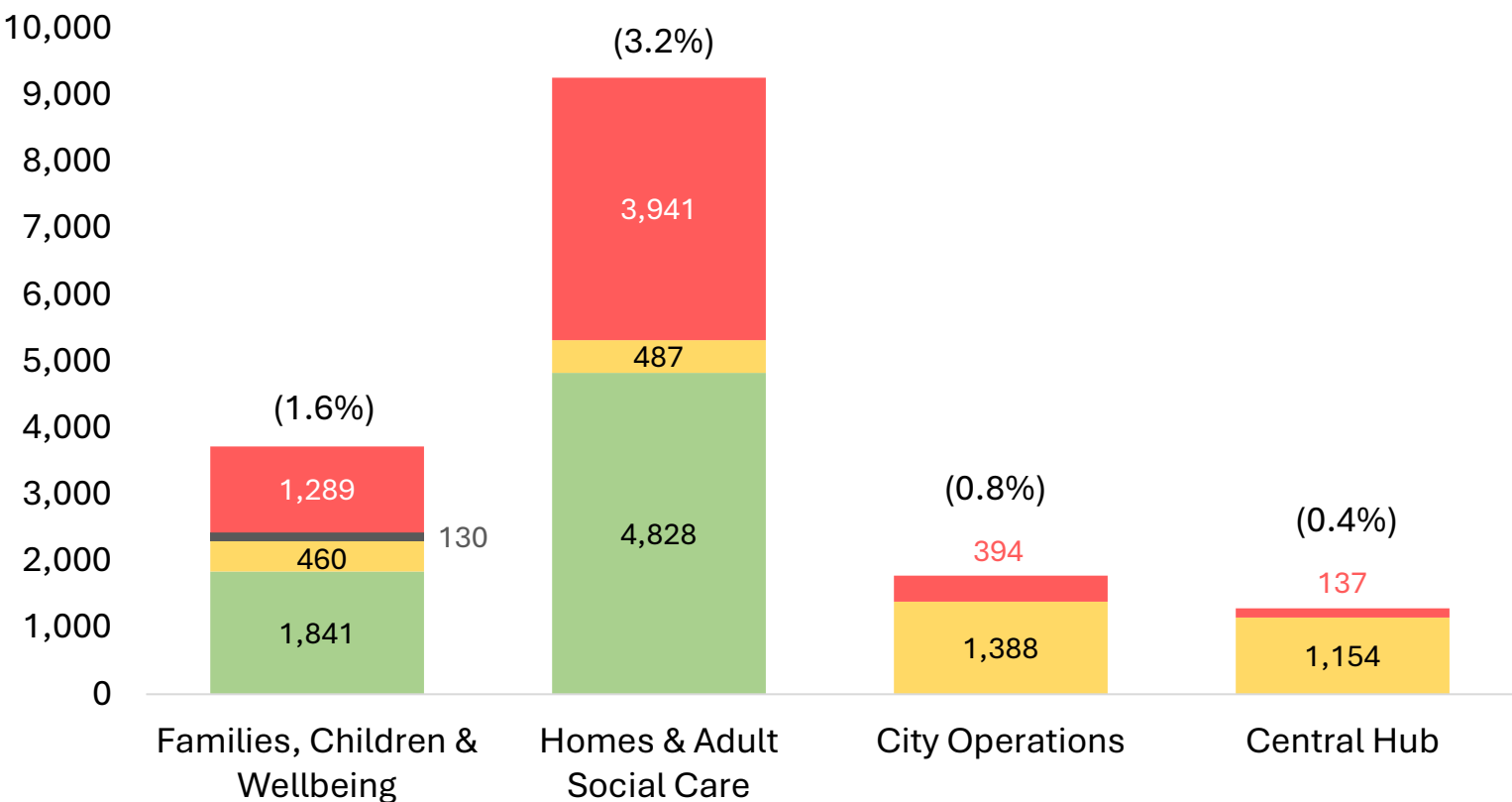


SR42	Risk title	Risk Owner	Current score	Target score
	Failure to deliver on or maximise opportunities of Devolution in the best interests of Brighton & Hove	Director Governance & Law	12	8
Summary description				
In December 2024, the government announced plans to replace District and County Councils with larger unitary Councils of at least 500,000 people. The English Devolution White Paper outlines devolved responsibilities, including transport, skills, housing, economic development, environment, health, public service reform, and public safety. Brighton & Hove, East and West Sussex are part of the priority programme for establishing a Mayoral Combined County Authority by May 2026, with Brighton & Hove hosting the mayoral election.				
Management controls		Oversight	Assurance	
The Devolution & LGR Programme Board oversees the programme plan and risk register, with internal engagement and horizon scanning. Brighton’s interests are represented in national conversations.		Progress is reported to CLT, Cabinet, Overview & Scrutiny Committee, and through member briefings and meetings.	Internal audit is planned for 2025/26, and regular meetings are held with the Ministry of Housing, Communities & Local Government on devolution matters.	
Mitigation actions				
Work with neighbouring authorities to establish the Sussex & Brighton Mayoral County Combined Authority and prepare for mayoral elections.				

SR43	Risk title	Risk Owner	Current score	Target score
	Failure to maximise the opportunities of Local Government Reorganisation in the best interests of Brighton & Hove	Head of Cabinet Office	12	8
Summary description				
While Brighton & Hove, as a unitary authority, is not required to undergo reorganisation, East and West Sussex are subject to this process, potentially impacting Brighton & Hove. Consequently, Brighton & Hove has been invited to submit a proposal. The government emphasises that local government reorganisation should not delay devolution and that both processes should complement each other.				
Management controls		Oversight	Assurance	
Progress is tracked by the LGR & Devolution Programme Board, with public consultation on proposals.		Updates are provided to CLT, Cabinet, Overview & Scrutiny Committee, and through member briefings.	No assurance activities have been conducted at this time.	
Mitigation actions				
Develop and consult on proposals for Local Government Reorganisation to achieve the best outcomes for the city and the region				

SR44	Risk title	Risk Owner	Current score	Target score
	Failure to maintain and demonstrate the health & safety compliance and fire safety of the council's operational property	Director People & Innovation	16	12
Summary description				
As an employer and a landlord, it's critically important that the premises we own and provide to our staff, service users and members of the public, is secure, compliant, safe and free from any hazards, including all regulatory compliance disciplines e.g. building safety, fire safety, gas safety, electrical safety, water safety, lift safety, asbestos, etc. Failure to maintain our council premises to the required standards or provide evidence of our compliance with regulations, could have significant impacts on the council’s reputation, financial sustainability, political positioning and health, safety, welfare and wellbeing of our staff, premises users and members of the public.				
Management controls		Oversight	Assurance	
Internal audits are conducted by the Health & Safety team, with a dedicated Fire Risk Assessor and reputable contractors for all disciplines. A Compliance Manager ensures adherence to schedules, and a dedicated role manages Legionella contracts.		The Corporate health, safety and wellbeing Board oversee health & safety compliance.	No assurance activities have been conducted at this time.	
Mitigation actions				
Embed the new Health & Safety oversight arrangements to monitor compliance and drive improvements of health, safety and wellbeing performance and practice across the council				
Invest in building and fire safety to meet new duties under the Building Safety Act and new Fire Safety (England) Regulations to ensure Health & Safety compliance through increasing personnel in associated teams and maintenance budgets to ensure they are adequate and sufficient.				
Continue to invest in required technologies such as Computer Aided Facilities Management (CAFM) system and associated personnel resource to bring operational efficiencies and data oversight for compliance and maintenance related tasks.				
Working with strategic property and finance colleagues ensuring a ‘one council’ approach in decision making and effective use of property portfolio				

Savings Monitoring 2025/26



■ Savings unachieved (000's) ■ In year pressures (000's) ■ Net savings anticipated (000's)  
■ Net saving achieved (000's) (Savings at risk as a % Of Net Budget)

36% of the savings package is potentially at risk

Directorate	25/26 Budget £'000	Forecast Variance £'000	Forecast Variance %	Status
Families Children & Wellbeing	79,774	1,445	1.8%	●
Homes & Adult Social Care	121,373	8,232	6.8%	●
City Operations	50,802	-1,793	-3.5%	●
Central Hub	33,207	388	1.2%	●
Sub total	285,156	8,272	2.9%	●
Corporate	-8,797	-496	-5.4%	●
Total General Fund	276,359	7,776	2.8%	●

The Month 7 forecast is important as it gives a clearer indication of trends than earlier forecasts.

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.

A significant level of savings is shown to be at risk with the report indicating that £5.761m (36%) of the substantial savings package in 2025/26 of £15.789m is potentially at risk.

# Increase in representation across the council

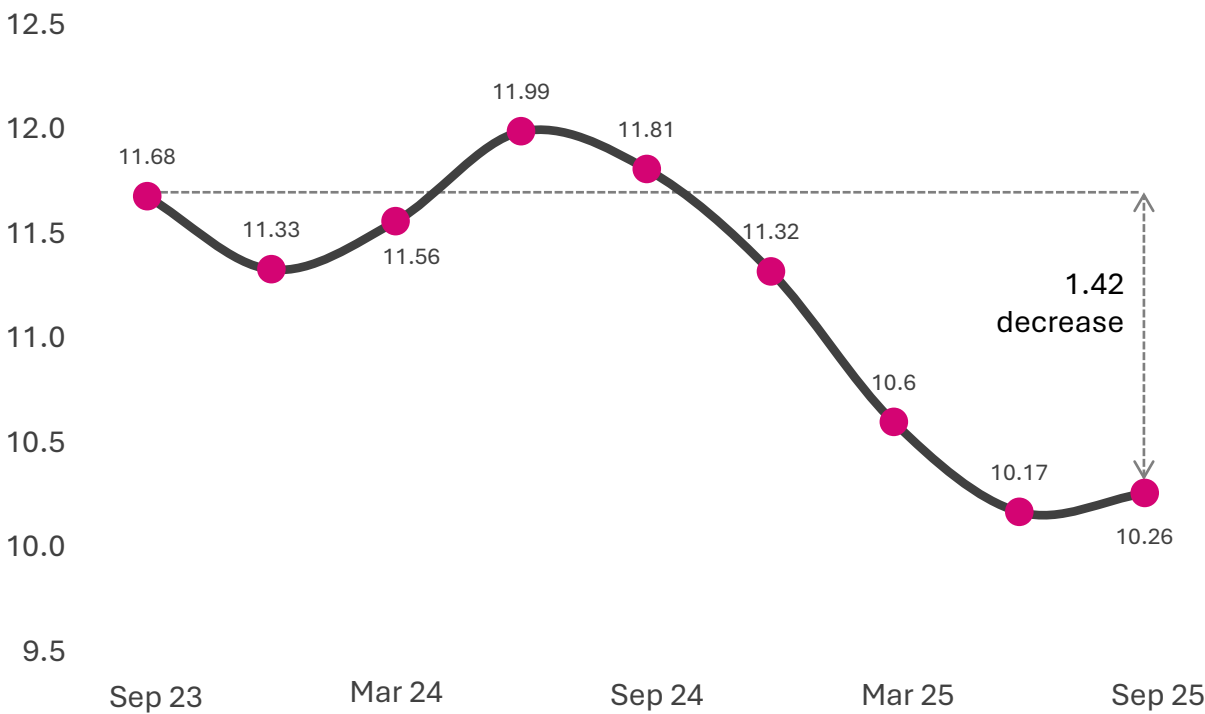
The council is committed to being a fair and inclusive place to work. Our corporate workforce profile targets are based on the city’s economically active population recorded in the 2021 Census.

The latest data shows an increase in rates of BME, disabled staff and LGBT across all levels of the council since March 2025. However, further improvement is required for disabled staff, particularly in roles graded M8 and above.

Directorate	Head count	BME			Disability			LGBT		
		target 12.1%			target 11.7%			target 12.2%		
		all staff	grade SO1/2 to M9	grade M8 and above	all staff	grade SO1/2 to M9	grade M8 and above	all staff	grade SO1/2 to M9	grade M8 and above
Central Hub	679	12.8%	11%	13.5%	13.5%	14.1%	6.8%	12.2%	15.4%	5.7%
City Operations	1,122	10%	13.3%	6.5%	9%	9.6%	4.4%	15.44%	16.5%	14.6%
Family Children & Wellbeing	1,263	13.3%	12.2%	13.3%	10.5%	9.8%	10.5%	17.23%	16.3%	24%
Homes & Adult Social Care	1,460	13.2%	9%	9.8%	9.1%	10.3%	10.3%	17.65%	20.8%	10.8%
Council	4,517	12.4%	11.3%	11.7%	10.2%	10.6%	8.4%	16.08%	17.5%	15.3%

# Sickness absence has decreased by 1.42 days on average per FTE

Sickness absence: average days lost (rolling 12 month)



Health & Safety: total incidents resulting in injury 2024/25



Sickness absence: average days lost by directorate

Directorate	Average days lost	Status	DoT
Central Hub	3.52	<div></div>	↑
City Operations	5.89	<div></div>	↓
Families Children & Wellbeing	4.33	<div></div>	↓
Homes & Adult Social Care	5.96	<div></div>	↑
Council	5.17	<div></div>	↓

Strategic enablers

Organisational Change

Digital Innovation & Technology

Devolution

Local Government Reorganisation

Corporately critical budgets

Adult Social Care transformation

Children's services transformation

Homes & Homelessness

Financial levers

Income & Commercialisation

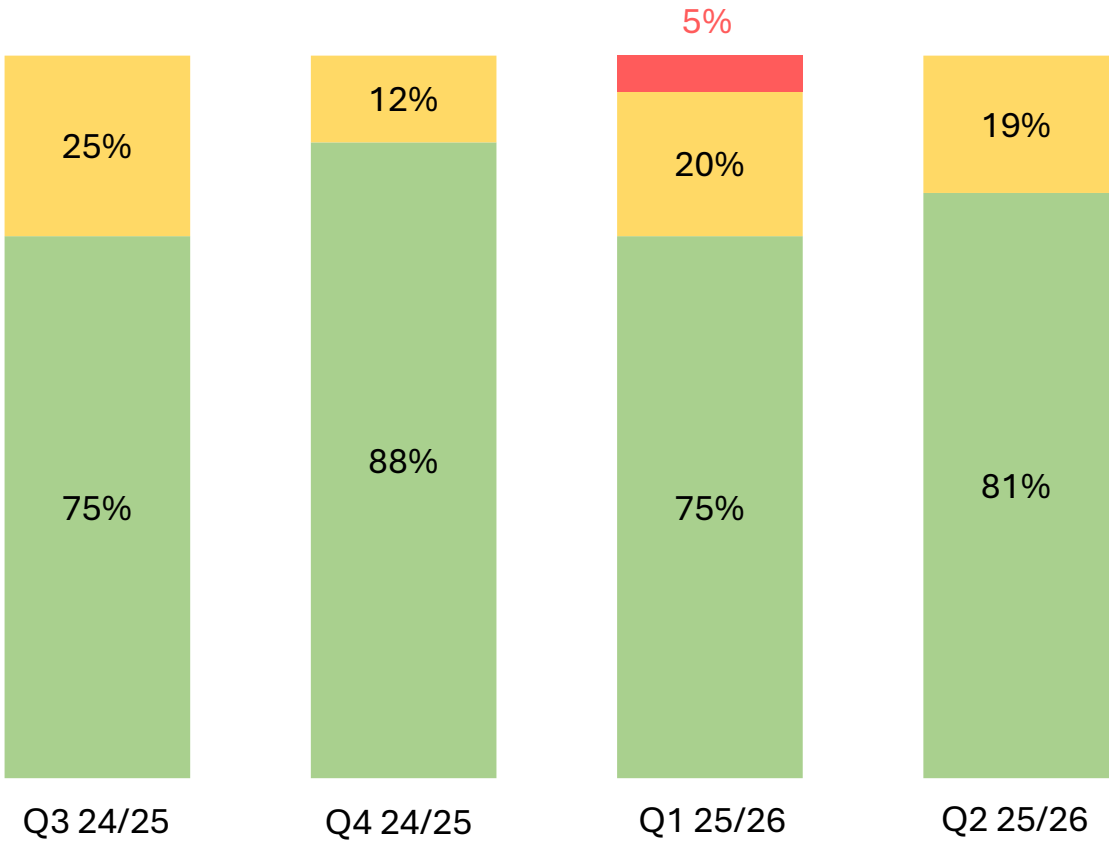
Procurement, Commissioning & Contract management

VfM

Asset Strategy

The council has taken necessary steps to ensure its financial sustainability through the development of a portfolio of Transformation & Innovation programmes and projects that support delivery of the Council Plan, Medium Term Financial Strategy and operationalising the Learning Framework.

Children’s safeguarding audits



Red – does not meet the required compliance standards

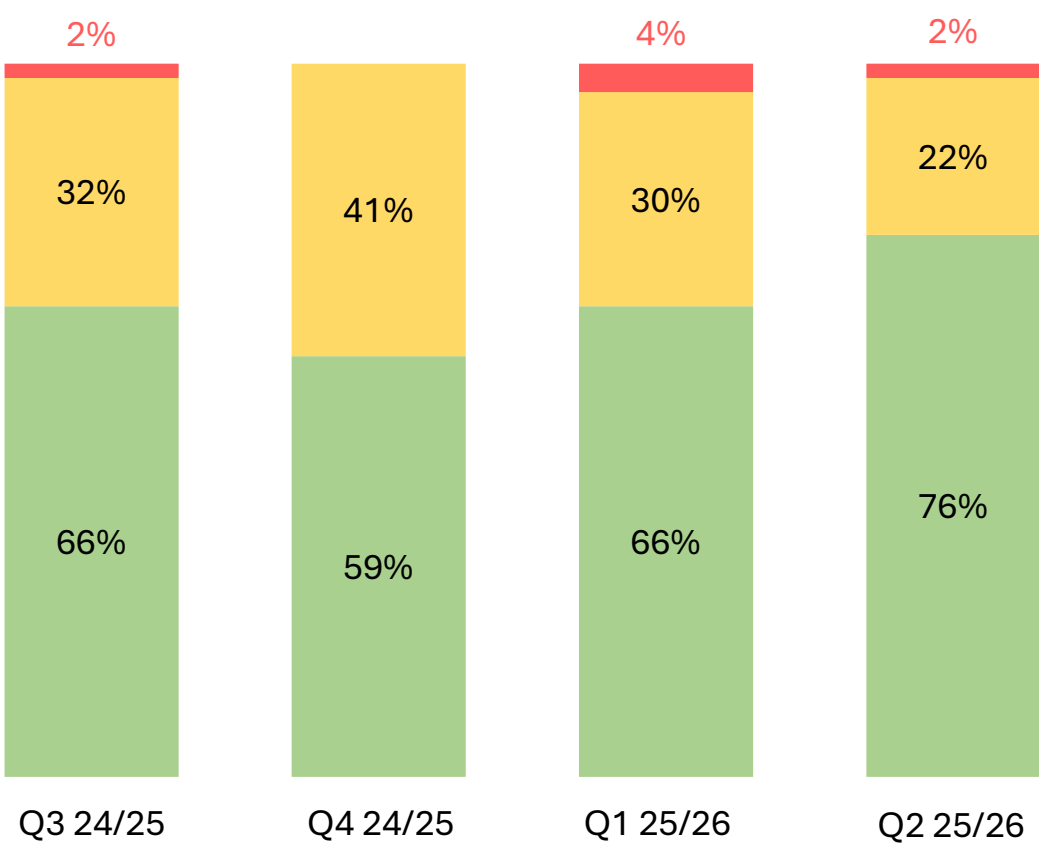
Amber – meets some of the required compliance standards

Green – meets the required compliance standards

Audits rated as **green**, **amber** or **red**.  
Part A of the audit tool relates to compliance with quality standards for key practice areas e.g. recording; statutory processes; supervision etc.

It is a requirement that if there is no up to date chronology, a case cannot be graded Green

Children’s safeguarding outcomes



Limited evidence that good outcomes have been achieved

Some progress but the child’s situation needs to improve

The outcomes for the child are good and sustainable

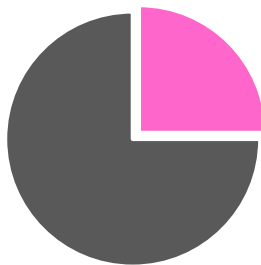
Managers (following a review of the audit with the social worker) are asked to provide an overall scale for the child’s outcomes





Audits

A quality assurance framework is in place for Safeguarding enquiries undertaken by social workers in Adult Assessment Service



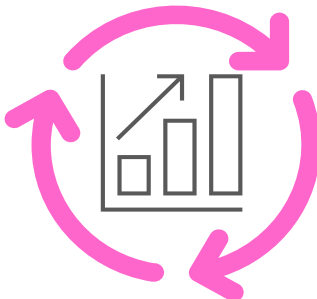
Each Quarter

Audits are completed by operational managers, general managers, the Principal Social Worker, Professional Standards & Safeguarding Team and the Head of Safeguarding for a selection of cases within that quarter



Compliance

The audit framework is overseen by the Moderation Panel which meets every quarter to validate the overall audit outcome



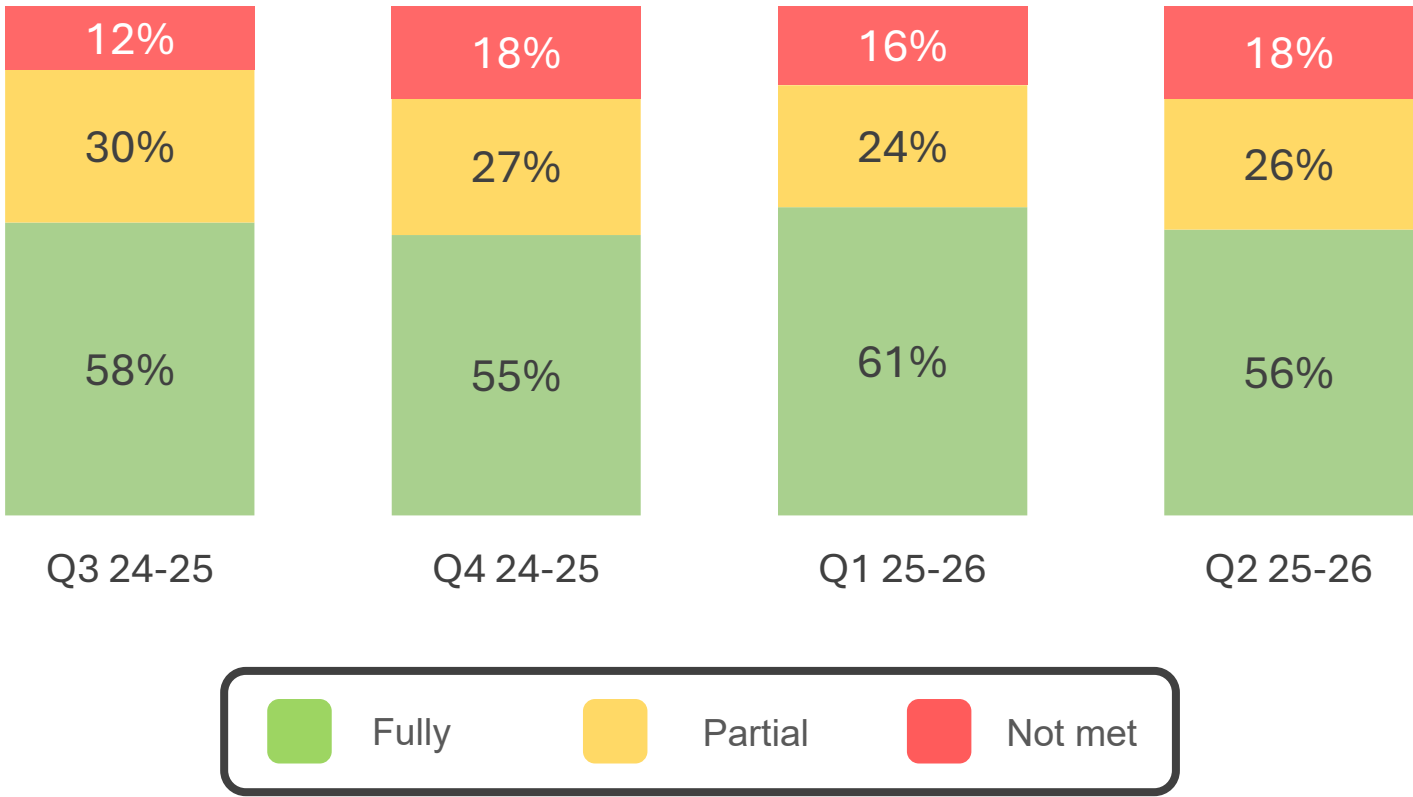
Improvement

Action plans are agreed in the Moderation Panel which also monitors the progress of remedial actions. Feedback by auditors to practitioners is a key part of the process

83% of people achieved their desired outcomes

Outcomes expressed by people when the council’s safeguarding duty is closed, as measured quarterly. This information does not include enquires closed where no outcomes were expressed

% of people achieving their desired outcomes by quarter



# Housing safety and compliance

Mid-year report 2025/26

The council has made substantial progress in housing safety and compliance since receiving a C3 rating from the Regulator for Social Housing (RSH) and is continuing its transition from recovery to a phase of consolidation and ongoing improvement, delivering significant progress in all compliance areas. We have tackled the most urgent safety actions, reinforced leadership and governance, and enhanced the reliability of our data, thereby restoring trust in the safety and quality of council homes. These positive changes are now firmly established in our day-to-day operations, ensuring continued improvement and accountability. Residents are benefitting from clearer communication, quicker responses to safety concerns, and a greater presence of safety works in their homes and communal areas. Governance is more robust, supported by the Housing Safety and Quality Assurance Board and expert appointments in fire and water safety. Furthermore, we have improved oversight of delivery and financial risks, with regular monitoring and reporting to ensure sustained progress and resilience.

Areas	RSH judgement in August 2024	Position as of June 2024	Position as of 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% homes with a valid 5-year EICR. 20.8% communal areas with a valid communal EICR	93% homes with valid 5-year EICR. 77.3% 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)	>600 buildings require a risk assessment” and >500 overdue water safety remedial actions	52.1% of buildings with a valid risk assessment. (Nov 2024 as no available data in June 2024)	90.4% of buildings with a valid assessment; 2,695 overdue actions (Sept 2025).
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 >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.

## Areas identified by Regulator for Social Housing as not compliant

	Jun-24	Sep-24	Dec-24	Mar-25	Jun-25	Sep-25	Oct-25
Smoke alarms/ detectors (% of homes)	81.50%	89.40%	95.70%	97.70%	98.80%	99.30%	99.40%
5 Year EICR domestic testing (% of homes)	53.00%	60.10%	67.90%	75.50%	84.10%	91.80%	93.00%
10 Year EICR domestic testing (% of homes)	72.00%	76.40%	80.90%	86.70%	91.90%	95.80%	96.60%
Communal EICRs (% of communal areas)	20.80%	33%	43.90%	48.50%	61.00%	76.60%	77.30%
Repairs over 28 days - HRA	9,653	6,599	6,950	4,134	2,898	2,496	2,479
FRAs in High Rise buildings (% of buildings)*	100%	100%	100%	30.40%	58.70%	97.80%	100%
FRAs in Medium Rise buildings: (% of buildings)	100%	100%	100%	100%	100%	100%	100%
FRAs Low Rise buildings: (% of buildings)	20.90%	92.90%	99.40%	99.80%	98.80%	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))	-	-	57.10%	62.10%	81.00%	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		96.60%	97.90%	98.80%	99.60%	99.80%	99.90%
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%
Asbestos Safety	Jun-24	Sep-24	Dec-24	Mar-25	Jun-25	Sep-25	Oct-25
Common ways – Total rolling compliance	99.40%	99.60%	99.80%	100%	100%	97.38%	82.34%
Asbestos Re-inspection programme – Common ways. Rate of progress		17.06%	94.90%	100%	24.70%	60.70%	73.60%
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%	97.50%	98.35%	97.54%	100%
Domestic lift and stair lift, equipment servicing	100%	100%	100%	100%	100%	100%	100%

# Risk Management Framework

# Overview of the Risk Management Framework

This framework supports the consistent and robust identification and management of risks at proportionate levels across the council, supporting openness, challenge, innovation and excellence in the achievement of council objectives.

The subsequent sections within this document explain how the council considers and manages risk in the pursuit of its objectives and provides assurance over its systems of internal control.

Elements of this framework are aligned to the Government's [Orange Book: Management of Risk – Principles and Concepts](#), [Risk Appetite Guidance Note](#), [Good Practice Guide: Risk Reporting](#) and the Local Government Associations [Must know guide: Risk management](#)

This document is structured in 2 parts:

**Part 1** outlines the fundamental principles and methodologies employed by the council in risk management. This section aims to clarify the rationale and objectives underpinning the design, implementation, and ongoing maintenance of the council's risk management

**Part 2** describes the methods used for managing risks to align with the principles outlined in Part 1.

## What is risk management?

Risk Management refers to the set of coordinated activities implemented to identify, assess, and control risk within the council.

A risk is the potential of an uncertain situation or event to impact on the achievement of the council's intended outcomes. Risk is usually expressed in terms of causes, potential events, and their impact:

- > A cause is an element which alone or in combination with other causes has the potential to give rise to risk
- > An event is an occurrence or change of a set of circumstances and can be something that is expected which does not happen or something that is not expected which does happen. Events can have multiple causes and consequences and can affect multiple objectives
- > the impacts, should the risk materialise, are the outcome(s) of an event affecting objectives, which can be certain or uncertain, can have positive or negative direct or indirect effects on objectives. Consequences can be expressed qualitatively or quantitatively

Risk is described in levels of exposure, which is a reflection of the amount of risk the council is exposed to as a combination of the likelihood of the risk occurring and the impact that may be experienced if that risk is realised.

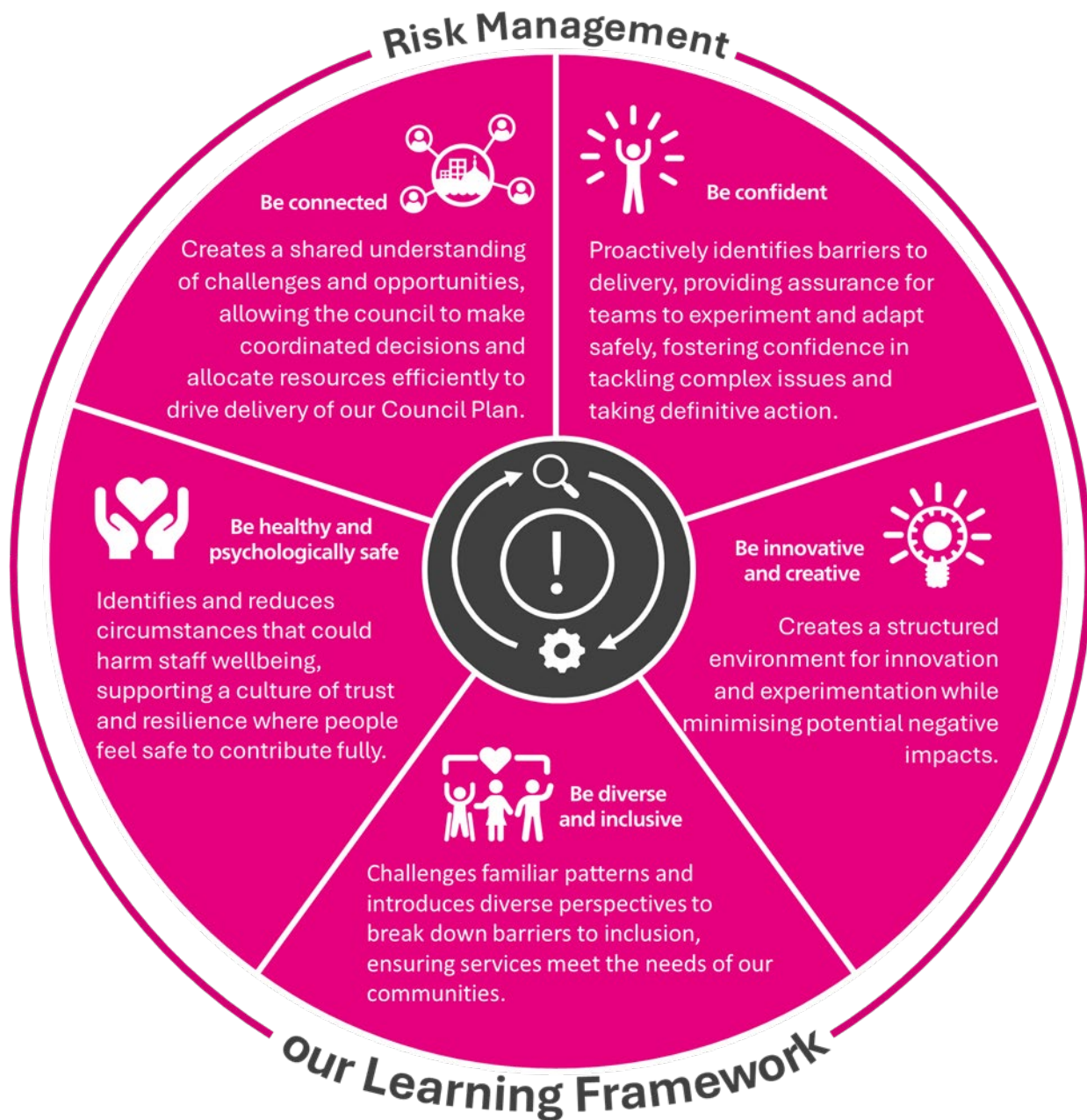
The level of risk exposure is determined through the evaluation and scoring<sup>1</sup> of the risk regarding the impact if the risk is realised and the likelihood of the risk being realised.

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<sup>1</sup> Further information of risk evaluation and scoring is detailed within [Part 2: Risk Management Process](#)



Our Risk Management Framework aligns with our Learning Framework



## Part 1: Principles of risk management



**Risk management is integral to the council's governance and leadership framework, underpinning its direction, management, and oversight at every level.**

### **Be confident**

Risk management is one of the eight elements in the Performance Management Framework, designed to support ongoing improvement and contribute to corporate governance by addressing risks that could affect the achievement of organisational objectives. The risk management framework aligns with CIPFA's Good Governance principles

*Determining interventions to maximise outcomes*

*Managing risks and performance through robust internal control and strong public financial management.*

View the [Local Code of Corporate Governance](#) for further details on the council's governance arrangements.



**Risk management is integral to all council activities to support decision-making in achieving our objectives.**

### **Be connected**

Risk management extends beyond the risk management processes and forms an integral part of all council activities to support decision-making and provide assurance in achieving our objectives.

The assessment and management of risk should be an embedded part of, and not separate from:

- > setting strategy and plans
- > evaluating options and delivering programmes, projects or policy initiatives
- > prioritising resources
- > supporting efficient and effective operations
- > managing performance
- > managing tangible and intangible assets
- > delivering improved outcomes

Risks that could affect decision-making are outlined in cabinet and committee papers, so councillors have complete information regarding any potential impacts on the achievement of council objectives.

This diagram shows how risks should be considered to inform planning and audit delivery to support achievement of our strategic objectives.

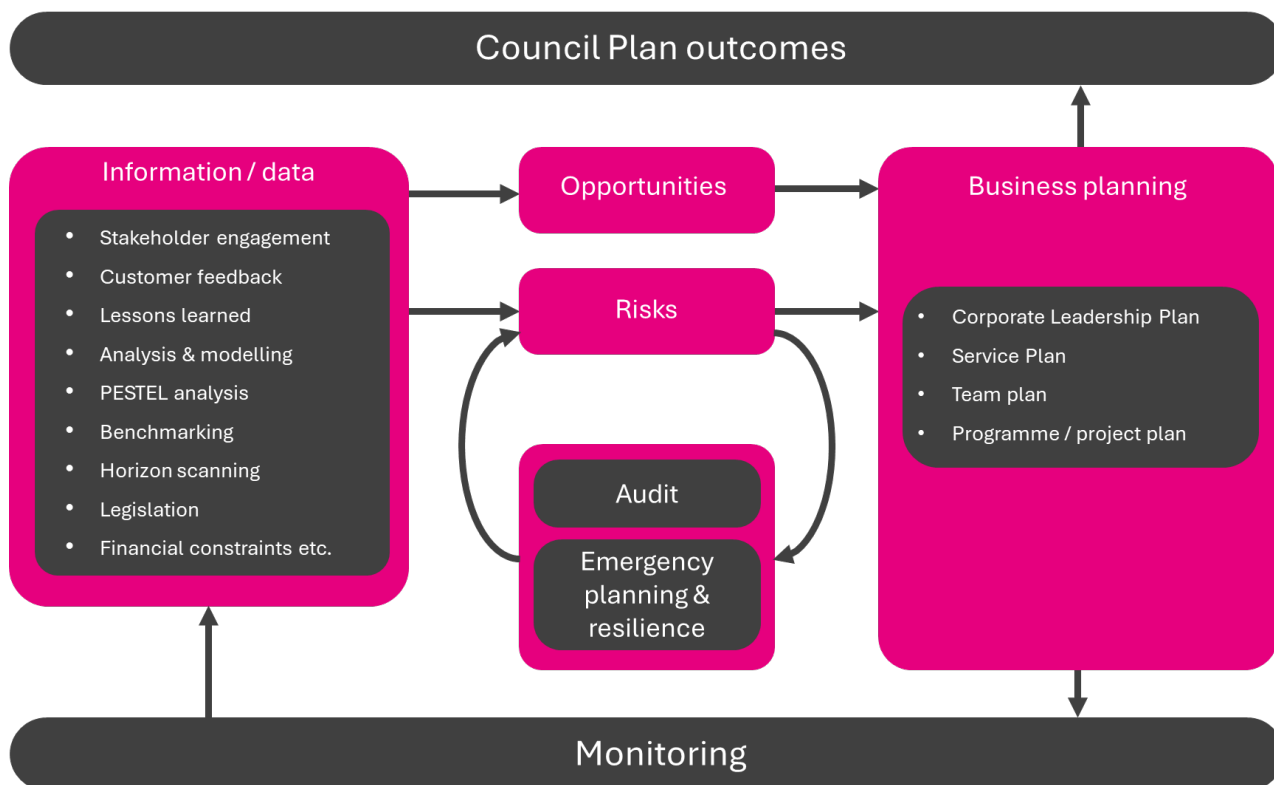


Figure 1: illustration showing how risk management informs council business



**Risk management processes are structured to include:**

### **Be confident**

#### **Risk Identification & Assessment**

Risk identification and assessment help the Council to determine and prioritise how risks should be managed.

Consideration of emerging risks, accurate descriptions of risk, including the causes and potential consequences and use of the Three Lines of Defence to evidence internal controls.

The council uses a range of techniques for identifying specific risks that may potentially impact on one or more objectives. The following factors, and the relationship between these factors, should also be considered:

- > tangible and intangible sources of risk

- > changes in the external and internal context
- > uncertainties and assumptions within options, strategies, plans, etc
- > indicators of emerging risks
- > limitations of knowledge and reliability of information
- > any potential biases and beliefs of those involved

Risks should be identified whether the causes are within the council's direct control or not. Even seemingly insignificant risks on their own have the potential, if they interact with other events and conditions, to have significant or create opportunities.

### Risk Treatment

Selecting and implementing the appropriate treatment using the Four Ts methodology (Treat, Tolerate, Terminate or Transfer). This supports the achievement of intended outcomes and ensures risks are managed to an acceptable level.

Correctly implemented, risk treatments will help prevent the risk from occurring and/or mitigate the impact of the risk if it does occur.

Re-assess the risk, on the basis that all planned treatments are completed to provide a Target Risk Score. This should be reflective of the organisations risk appetite for that risk area.

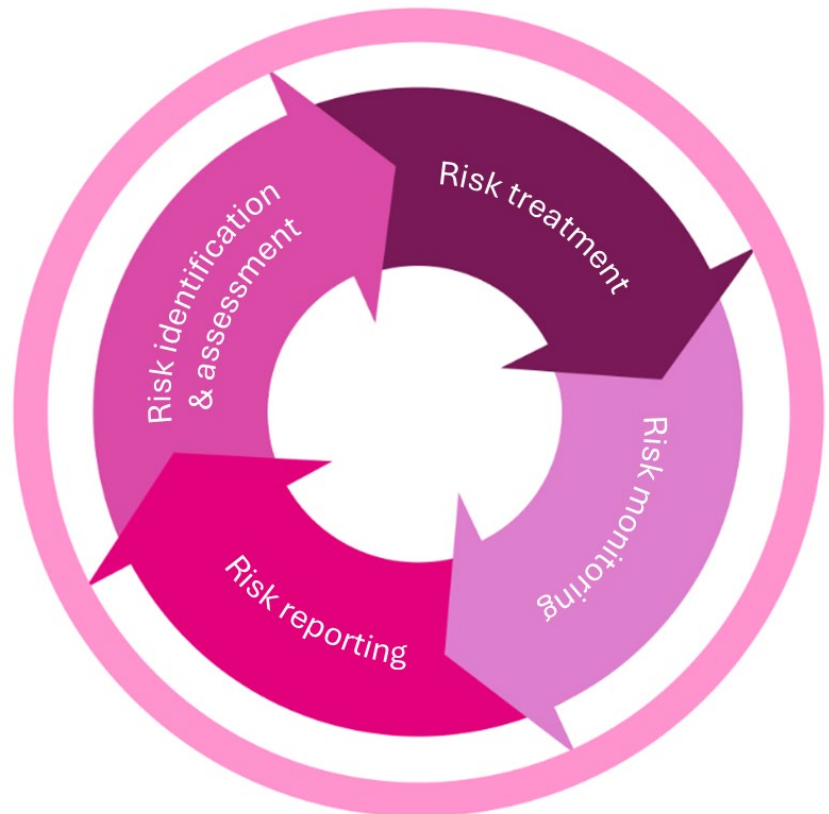


Figure 2: illustration of the risk management process cycle

### Risk Monitoring

The effective monitoring of risks ensures that timely and insightful action can be taken and supports strategic planning and decision making.

Implementing effective monitoring of the causes, progress of actions and effectiveness of controls to understand current level of risk exposure.

### Review & Report

Risk reporting enhances the quality of decision-making and supports management, and oversight bodies, in meeting their responsibilities.

Regularly review the risk descriptions, scores, controls, and actions in light of any new information or changes in circumstance timely, accurate and useful risk reporting to

enhance the quality of decision-making and to support management and oversight bodies in meeting their responsibilities.



**Be innovative  
and creative**

**Risk management shall be continually improved through learning and experience.**

The council continually monitors and adapts the risk management framework to address external and internal changes.

The council looks to continually improve the suitability, adequacy and effectiveness of the risk management framework and process. This is supported by the consideration of lessons based on experience and, an annual review of the risk management framework.

Annual risk management audits, scrutiny from Audit, Standards & General Purposes Committee and reviewing and testing our systems of internal control as part of the development of the Annual Governance Statement provide further opportunity for improvement.



**Be healthy and  
psychologically safe**

**Risk Management is an integral part of our behaviour and culture**

The council's risk culture supports transparency, welcomes constructive challenge and promotes collaboration ensuring an openness to scrutiny and embracing expertise to inform decision-making and learn.

The risk culture requires:

- > Leaders at all levels setting the tone and personally demonstrating the importance of the management of risk with clear accountability, to give greater confidence in decision-making.
- > Communication channels that enable and encourage conversations and challenge around risk throughout the organisation as well as communicating corporate messages of success and learning from both positive and negative experiences.
- > Empowering employees to own and therefore manage risks at an operational level, and for all employees to feel able and empowered to speak up where there is a concern that threatens success, delivery, achievement, and good performance.

- > An embedded and accessible source of information, practical examples and scenarios, and easy to understand guidance to make the 'risk process' real and relatable to everyone.

## Part 1a: Risk management approach

### Levels of risk management across the council

Risk identification and assessment supports the prioritisation of risks and ensures they are managed appropriately and with sufficient allocation of resources and oversight.

The council has three distinct levels of risk management:

- > Strategic (corporate)
- > Directorate
- > Service or Programme/Project

The table below provides an overview of the differences in risk management between the three levels.

Level	Owner	Level definition	Management process	Oversight
<b>Strategic Risks (SR)</b>	A member of the Corporate Leadership Team (CLT)	Significant impact on the achievement of Council Plan outcomes Impacts multiple directorates, partners or the city	Managed by Corporate Performance & Risk Team Reviewed quarterly at DLT and CLT meetings Reviewed biannually at Cabinet	Cabinet Audit, Standards & General Purpose Committee Lead Cabinet Member External & Internal Audit
<b>Directorate Risks (DR)</b>	A member of a Directorate Leadership Team (DLT)	Will impact on the ability to deliver Council Plan outcomes Impacts multiple services or departments	Managed by DLTs with support from Corporate Performance & Risk Team Reviewed quarterly at DLT and CLT	Corporate Leadership Team Lead Cabinet Member
<b>Service Risks</b>	Head of Service or Team Leader	Impacts on achievement of the service objectives Response can be managed within service	Managed within service	Directors Heads of Service



Programme & Project Risks	A member of the Programme or Project Board	Impacts on achievement of the Programme or Project's objectives Response can be managed within Programme or Project	Managed within programme or project	Directors Programme/Project Board
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The level a risk is managed at will depend on the scope, scale of potential impact and the type of response required. Risks can be escalated or de-escalated between the management levels as the level of risk exposure increases or decreases.

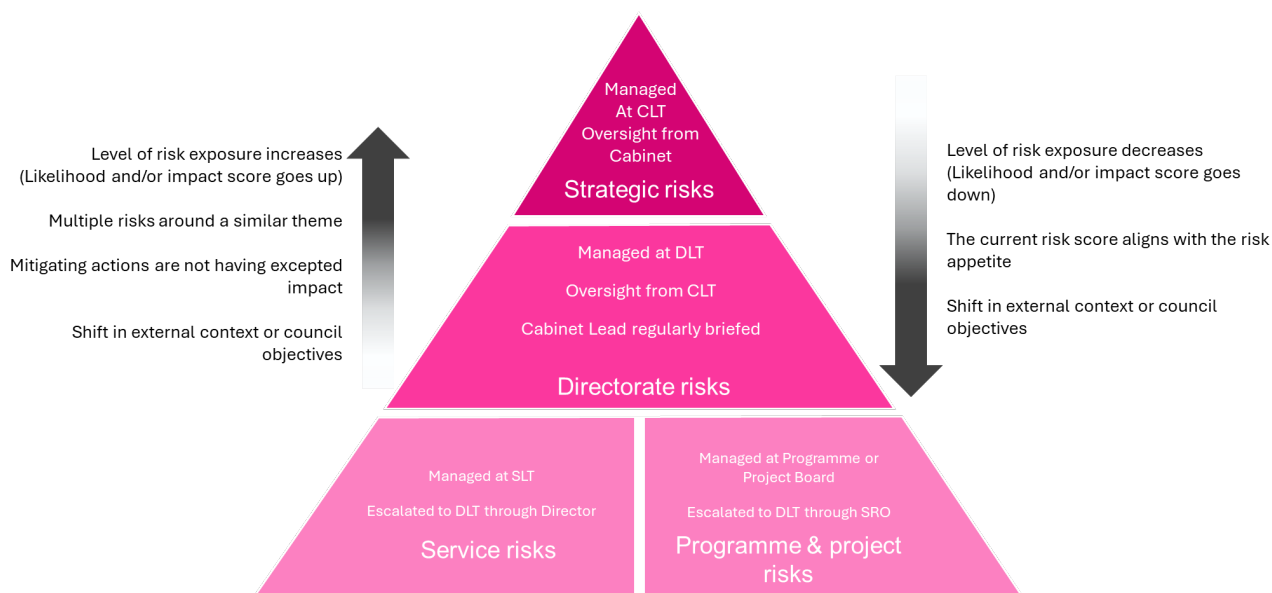


Figure 4: illustration of risk management levels

## Risk assurance

Risk assurance specifically refers to the processes and systems which can be used to hold the council to account and give confidence in how it delivers its duties, functions and outcomes through the management of risk.

Directly supporting the levels of risk management, the council uses the 'three lines of defence' model to assess and provide assurance of the effectiveness of our internal controls for any strategic risk.

The Three Lines of Defence model outlines three levels of assurance within our existing controls for each risk, providing evidence of the controls, oversight and existing processes specific to that risk.

The use of the Three Lines of Defence model demonstrates:

- > Robust controls are systematically established,
- > Comprehensive checks are in place across all control areas,
- > the best use of the assurance process, i.e. all areas checked have oversight and duplication is avoided

Risks managed at corporate, directorate, service or programme/project level need to include oversight and assurance arrangements within the details of their existing controls.

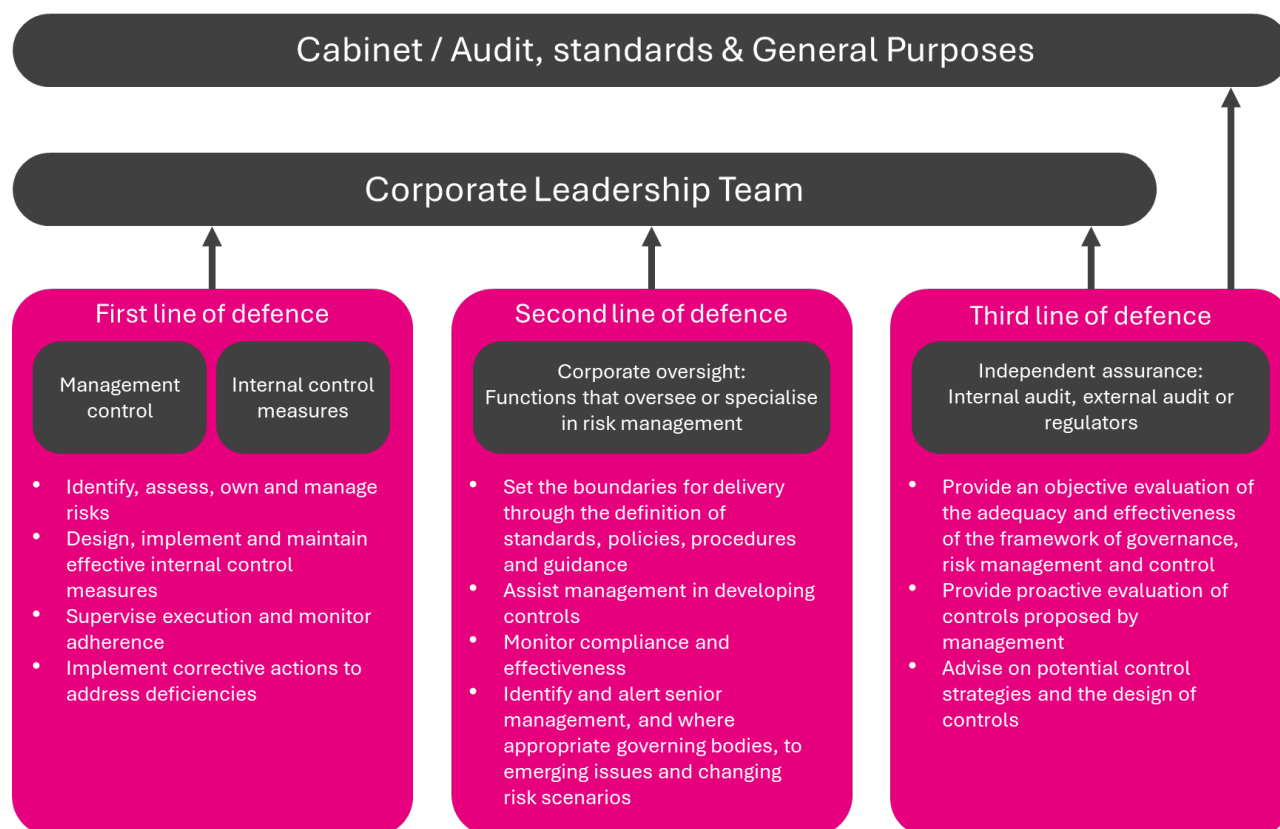


Figure 5: illustration of three lines of defence model

## Roles & Responsibilities

To ensure the effective and robust management of risk, specified council functions, members and officers are responsible and accountable for the management of risk.

The key responsibilities for the management and oversight of risk are detailed within the Council's Constitution. The table below outlines these responsibilities alongside those responsible for managing the process.

Role	Responsibilities
Cabinet	Approval of the Risk Management Framework Oversight and review of strategic risks
Audit, Standards & General Purpose Committee	Oversight of the risk management framework and recommend improvements to strengthen risk management
Cabinet Portfolio Leads	Oversight of relevant risks

Corporate Leadership Team (CLT)	<p>Accountable for the Strategic Risk Register</p> <p>Review the strategic risk register, ensuring it contains appropriate risks and they are managed effectively</p> <p>Escalation/de-escalation of risks between directorate and strategic levels</p> <p>Agree recommendations in changes to strategic risks</p> <p>Promote culture of risk management</p> <p>Each CLT member is responsible for their Directorate Risk Register</p>
Directorate Leadership Team (DLT)	<p>Management of the directorate risks, ensuring it contains appropriate risks, and they are managed effectively</p> <p>Escalation/de-escalation of risks between service and directorate</p>
Risk Owner	<p>Accountable for the management of assigned risks, ensuring descriptions, assessments and risk scores are accurate, and suitable controls and actions are in place to mitigate the risk</p> <p>Provide updates on the risk, including any emerging information which may impact the risk</p>
Risk Action Lead	<p>Responsible for delivering the action assigned</p> <p>Provide progress updates</p> <p>Support the risk owner to describe and mitigate the risk</p>
Corporate Risk Management Lead	<p>Maintain the Strategic Risk Register through regular reviews with DLTs and CLT</p> <p>Support DLTs to review their Directorate Risk Registers</p> <p>Implement and review the risk management framework</p>

## Risk appetite

Risk Appetite is the amount of risk the council is willing accept, in order to achieve its strategic objectives.

Fundamentally, it is the amount of uncertainty the council is prepared to accept in the pursuit of its objectives within any given scenario. Once defined, risk appetite improves the consistency across governance and decision making by increasing awareness of the council's tolerance for risk and ensures the council attention is directed towards the correct areas.

Each risk category has a risk appetite position statement that defines the level of risk the council is prepared to accept within that particular area at any given point in time and in

the context of our strategic objectives, current priorities, and our power to directly influence any given situation.

The risk appetite for each category is set out in the [council's risk appetite statement](#).

These position statements inform how we approach decisions within each risk category and ensure the council remains within its preferred level of risk appetite.

When assessing and scoring strategic risks, the risk appetite is considered, and a target score is set at a tolerable level.

The below table provides a general description of each appetite level.

Appetite Level	General description (for guidance only)
Averse	We are unwilling to tolerate risks in this area Will always select the lowest risk option Avoidance of risk is key to organisation objective Close to zero tolerance for uncertainty of outcome
Minimal	We will take the lowest possible risks in this area Preference for ultra-safe, low risk actions Activities will only be taken when essential, with strong governance in place and limited possibility or impact of failure
Cautious	We will consider taking risks within this area but hold a preference for safe options Willing to consider acting where benefits outweigh the risks and with strong governance in place Activities with a higher level of risk may be acceptable if it is deemed largely controllable
Open	We will tolerate risks with a higher level of uncertainty of outcome in the right conditions We aim to maintain a balance between a high likelihood of successful delivery and maximizing benefit and cost-effectiveness. Will take risks but manage impact
Eager	Willing to tolerate a high level of risk and accept uncertainty of outcome in order to maximise opportunity and potential higher benefit

For example, when determining how to address a risk within an area where the council has a minimal appetite, appropriate measures will need to be put in place to ensure the desired outcome is achieved. Whereas a risk in an area where the council has an open or eager appetite, whilst still requiring internal control, governance and oversight there will be an acceptance of a higher level of uncertainty in our actions to deliver the intended outcomes.

Strategic risks are presented to Cabinet at least annually. Cabinet, and the relevant Cabinet Lead, should take account of the risk appetite when considering whether the target score is appropriate and provide support and constructive challenge to the risk owner.

## Risk Categories

The [Orange Book](#) recommends risks should be organised by taxonomies or categories of risk. Grouping risks in this way supports the development of an integrated and holistic view of risks allowing the council to better understand and address risks as a connected council.

The below categories represent the core risk areas. Failure to manage risks in any of these categories may lead to financial, reputational, legal, regulatory, safety, security, environmental, employee, customer and operational impacts.

Category	Description
Governance	Related to weaknesses in internal control, lack of clear ownership & accountability, oversight or assurance.
Legal	Related to defective transactions, claims, or other legal events that may result in liabilities or losses or a failure to meet legal or regulatory requirements or to protect assets.
Property	Related to weaknesses in property asset management that may lead to non-compliance, harm, or suffering to employees, contractors, service users, or the public.
Financial	Related to weaknesses in managing finances in accordance with requirements and legislation, financial investment, maximising revenue opportunities or insufficient service funding.
Procurement, partnership or commercial	Related to weaknesses in the management of commercial partnerships, supply chains and contractual requirements, resulting in poor performance, inefficiency, poor value for money, fraud, and/or failure to meet business requirements/objectives. Includes risks associated with procurement of goods/works/services
People	Related to leadership and engagement, culture, behaviours, and non-compliance with employment legislation/HR policies or insufficient capacity and capability of services.
Safeguarding	Related to practices and internal controls for safeguarding to meet our statutory duties.
Health and safety	Related to the management of Health & Safety operational practices, compliance and reporting.
Technology	Related to technology not delivering the expected services due to inadequate or deficient systems/processes, a lack of investment and development, poor performance or inadequate resilience.
Information and data use	Related to a failure to produce robust, suitable, and appropriate data/information systems and processes or to exploit data/information to its full potential.

Information Governance & Security	Related to a failure to prevent unauthorized and/or inappropriate access to systems, assets and information including cyber security and non-compliance with UK General Data Protection Regulation requirements.
Project or Programme	Risks associated with innovation and change programmes that may not successfully and safely deliver requirements and intended benefits to time, cost, and quality.
Reputational	Related to adverse events, including ethical violations, a lack of sustainability, systemic or repeated failures, or poor quality that may result in damage to the council's reputation or destruction of trust and relations.

## Part 2: Risk Management Process

This section provides an overview of the council's risk management process.

### Recording risks

Before starting any risk identification or assessment, you should establish how you are going to capture and record the risks.

Risks are generally recorded in a risk register that captures all the details and provides a simple and effective way to view and prioritise risks. Risk registers can vary in format, however the most frequently used is an excel spreadsheet. Further details of what to include in a risk register are provided in [Part 2a: Supporting material](#).

Strategic and directorate risks are recorded and managed corporately on a central register.

Service, programme and project risks should use an appropriate register to capture and manage risks.

### Step 1: Risk Identification & Assessment

Identifying risks is the first stage of the risk management process. Risks can be identified by anyone, but they need to be clearly articulated so that the council is fully aware of the causes and potential impacts to ensure the right controls and treatment can be put in place.

This is often best done in groups of stakeholders who are responsible for delivering or are impacted by the objectives. It is important to identify risks when:

- > Setting strategic aims
- > Setting business objectives
- > Writing plans
- > Project planning
- > Appraising options
- > Making changes to business set up or service provision
- > Reviewing audits
- > Learning from incidents

It may be useful to use the [risk categories](#) as prompts when identifying risks.

### Risk Description<sup>2</sup>

Once identified, it is important to provide accurate and honest descriptions.

Start by describing the risk in a short summary that clearly explains the risk event. This often begins with terms such as:

- > Loss of ...
- > Uncertainty of ...
- > Ineffective Partnership with ...
- > Slow Development of ...

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<sup>2</sup> Definitions for risk event, causes and impacts is provided in [Part 1: Overview](#)



- > Unable to take up Opportunity to ...
- > Threat of ...
- > Failure to ...

Then detail what causes may lead to the risk event occurring and the impacts, should the risk materialise. It is best to use short and concise sentences when detailing the causes and impacts.

It may also be useful to consider when the risk is likely to occur (it's proximity), as this will further support decision-making and prioritisation.

### Existing Controls

Taking into consideration the causes and potential impacts of the risks, detail what current process, systems and measures already in place that support the prevention of the risk event from occurring or reduce the impact if it does occur.

It is important to be open and honest when detailing the controls to ensure the current level of risk exposure is understood and appropriate treatment can be applied.

### Assessing the level of risk exposure

Risks are prioritised by assigning scores of 1 to 5 to the likelihood (L) of the risk occurring, and the potential impact (I) if it should occur. These L and I scores are multiplied; the higher the result of  $L \times I$ , the greater the level of risk exposure. For example  $L4 \times I4$ , which denotes a Likelihood score of 4 (Likely) x Impact score of 4 (Major), which gives a total risk score of 16. This would be considered a high level of risk exposure.

Likelihood	Almost certain (5)	5	10	15	20	25
	Likely (4)	4	8	12	16	20
	Possible (3)	3	6	9	12	15
	Unlikely (2)	2	4	6	8	10
	Almost impossible (1)	1	2	3	4	5
		Insignificant (1)	Minor (2)	Moderate (3)	Major (4)	Catastrophic (5)
		Impact				

Figure 5: Risk scoring matrix

A colour coded system, similar to the traffic light system, is used to distinguish risks that require intervention. Red risks are those with the highest level of exposure (15-25), amber risks hold a significant level (8-14), yellow risks are moderate (4-7), and then green risks have the lowest level (1-3).

The purpose of scoring is to support prioritisation of risks to ensure resources are allocated to the most significant risks. Heat maps are a helpful way to see how risk scoring compares.

When assessing the current risk score, consideration must be made to the existing controls identified. For example, if we have robust systems in place that tell us how close we are to the risk occurring the likelihood of it occurring would be significantly lower.

Scoring should be a realistic assessment without optimism bias. The risk scoring guidance below can support you to assess the risk score by providing examples of what the impact may be in relation to specific impact areas. If the risk has the potential to impact multiple areas, this should be taken into consideration when determining the overall impact score for the risk, as the overall impact to the organisation may be higher as a result. For

example, if the risk has a moderate impact in 3 separate areas, you may wish to score the overall impact as major.

It should be noted that the below tables, and definitions, are to provide guidance and support when considering how to score risks. They are not intended to provide specific instruction when scoring the level of impact, and as such should be amended appropriately based on the risk being scored.

#### Likelihood Risk Score

Risk Score	Likelihood Descriptor	Guidance
1	Almost Impossible	Difficult to see how this could occur. Has happened very rarely before or never Is a highly unlikely climate scenario, even at the extremes of climate projections
2	Unlikely	Do not expect occurrence but it is possible. Less than 10% chance of occurrence May have happened in the past; unlikely to happen in the next three years
3	Possible	May occur occasionally. Only likely to happen once in 3 or more years Has happened in the past; reasonable possibility it will happen as part of climate change scenarios
4	Likely	Will occur persistently but is not an everyday occurrence. Likely to happen at some point within the next 1-2 years Circumstances occasionally encountered within likely climate change scenarios
5	Almost Certain	High probability of situation occurring Regular occurrence, Circumstances frequently encountered, daily/weekly/monthly

## Impact Risk Score

The below tables provide guidance on how to score the impact of the risk within specific areas.

Impact Area	1 Insignificant	2 Minor	3 Moderate	4 Major	5 Catastrophic
<b>Health &amp; Safety</b>	minor injury, basic first aid required, 1 person affected, no absence from work, no delay	non-permanent harm, short-term injury, resulting in absence of up to 6 days.	causing semi-permanent disability, injury, disease, or harm which could interrupt attendance at work for of 7 days or more	causing death, permanent disability, serious injury or harm, e.g. loss of function or body part(s), serious disability, single death of any person. Long term absence from work.	multiple deaths involving any persons, long term absence from work, more than 30 days extended hospital stay
<b>City &amp; community</b>	insignificant disruption to community services, including transport services and infrastructure	minor localised disruption to community services or infrastructure less than 24 hours	damage that is confined to a specific location, or to a number of locations, but requires additional resources. Localised disruption to infrastructure and community services	significant damage that impacts on and possible breakdown of some local community services. Requires support for local responders with external resources	extensive damage to properties and built environment in affected areas. General & widespread displacement of more than 500 people for prolonged duration. Community unable to function without significant support
<b>Service Delivery</b>	No or marginal service disruption No noticeable drop in service performance	service disruption or partial closure for 1 or 2 days Drop in service performance	service disruption or total closure for 1-3 days Poor service performance Slight impact on Council Plan outcomes	service disruption or total closure for 3-7 days Repeated poor service performance Impact to delivery of Council Plan outcomes	Service disruption or total closure for 7+ days Ongoing failure to provide an adequate service Failure to deliver on Council Plan outcomes
<b>Economic</b>	none/minimal financial burden (less than £100, can be resolved at local service / department level), minor interruption to income generation, no permanent loss	minimal financial burden or disruption to income generation (less than £1,000 but greater than £100). Can be resolved at line manager/ service manager level through usual budgetary measures	moderate financial burden (less than £10,000 but greater than £1,000). Interruption to income generation lasting less than 14 days, majority of income recoverable but at additional cost	major financial burden (less than £100,000 but greater than £10,000). Can include significant extra clean up and recovery costs.	Catastrophic financial burden (greater than £100,000). Extensive clean up and recovery costs

<b>Environment</b>	insignificant impact on environment	minor impact on environment with no lasting effects	limited impact on environment with short-term or long-term effects	significant impact on environment with medium to long term effects	serious long-term impact on environment and/or permanent change.
<b>Reputation</b>	organisation(s) reputation remains intact	minimal impact on organisation(s) reputation	moderate impact on organisation(s) reputation	major impact on organisation (s) reputation / National adverse publicity	catastrophic impact on organisation(s) reputation. International adverse publicity
<b>Personal Privacy Infringement</b>	No personal details compromised / revealed	Isolated individual personal detail compromised / revealed	All personal details compromised / revealed	Many individual personal details compromised / revealed	Personal Data revealed which leads to serious incident and lack of credibility in organisation's ability to manage data, fine

Project Delivery	1 Insignificant	2 Minor	3 Moderate	4 Major	5 Catastrophic
Project Status	Project on schedule to deliver the planned works on time and to budget	Project on schedule to deliver the planned works on time and to budget	The project has encountered some issues which could affect the delivery of the planned works within agreed time, costs, and resources	The project has encountered some issues which could affect the delivery of the planned works within agreed time, costs, and resources	Delivery of the planned works within agreed time, costs and resources is presently threatened
Timescales	No delays anticipated	The project is delayed by 1 week or under	The project is delayed by 1 week – 2 weeks	The project is delayed by 2 weeks or over	The project is delayed for an indefinite period
Resources	The project is fully resourced	The project is fully resourced	A lack of human resources which could impact overall delivery and require Programme Board attention	Lack of human resource is impacting successful delivery and needs to be addressed immediately	Lack of human resource is impacting successful delivery and needs to be addressed immediately
Issues	All issues under control and no outstanding issues requiring Programme Board attention	All issues under control and no outstanding issues requiring Programme Board attention	Outstanding issues which could impact overall delivery and require Programme Board attention	Outstanding issues which could impact overall delivery and require Programme Board attention	Outstanding issues which will impact the overall delivery require URGENT Programme Board attention
Risks	All risks under control and no outstanding issues requiring Programme Board attention	All risks under control and no outstanding issues requiring Programme Board attention	Risks that have a medium probability of occurring and will have a medium impact on the programme and require Programme Board attention if there is no change or is increasing	Risks that have high or medium probability and impact if they occur and require the Programme Board attention	Risks that have high or medium probability and impact if they occur require the Programme Board attention
Budget	Predicted costs are on track and within the cash limit budget	Predicted costs are on track and within the cash limit budget	Predicted costs are under 10% of budget	Predicted costs are up to 10% over budget	Predicted costs are higher than 10% over budget

## Step 2: Risk Treatment

Based on the Current Risk Score, and considering the risk appetite, determine the most appropriate treatment for the council to take in addressing the risks by using the four T's and record the reason for your choice.

<b>T</b> reat	Take further action to reduce the likelihood or impact
<b>T</b> olerate	Decide the risk level is tolerable and that no extra resources will be applied
<b>T</b> erminate	Stop undertaking the activity which leads to the risk
<b>T</b> ransfer	Pass to another party or organisation to manage and reduce the council's liability

The below table provides recommended approach based on the level of exposure

Risk Rating	Risk Score	Recommended action
High	15-25	Immediate action and/or escalation required Mitigating actions must be taken Monitor the risk to ensure action is having the desired effect
Significant	8-14	Review and ensure effective controls Mitigating actions should be taken Monitor the risk to ensure action is having the desired effect
Moderate	4-7	Monitor in case the risk levels increase
Low	1-3	Monitor as part of business as usual

### Mitigating Controls Actions

If you have decided that the risk should be treated, then mitigating actions should be taken to reduce the likelihood and/or impact of the risk. When developing mitigating actions, Risk Owners are strongly encouraged to work with all key stakeholders, including external partners to ensure the right actions are identified and stakeholder buy in into the delivery of these actions. The actions must be SMART (Specific, Measurable, Achievable, Realistic and Timebound) and agreed by the Risk Action Lead who is named responsible for delivering the action. Mitigating actions should have a start and end date and progress should be regularly tracked.

It is important to ensure that mitigating risk actions map to directorate or service plan actions, so that they are planned and resourced adequately to be completed within the timeframe indicated.

You should also detail any action required to tolerate, terminate or transfer the risk to ensure that this is completed in a controlled way, and any additional monitoring is established and embedded.

### Target Risk Score

The target risk score is scored similarly to the current risk score but is based on the assumption that the mitigating actions are completed at the expected time. This must reflect the level of risk the council is willing to operate at to bring the risk exposure down to

tolerable level. However, the score needs to be realistic and consider the uncertainty of the situation and resources available to deliver actions so the target risk score can sometimes remain as a high 'red' score regardless of mitigation.

### Step 3: Risk Monitoring

Risks must be regularly monitored to support understanding of whether the level of risk exposure is changing and to what extent the existing controls, or mitigating actions, are having the desired effect. A monitoring structure should be agreed that identifies key indicators to show the progress or effect of controls and actions at suitable intervals.

If there is not any current control that can be used to provide this insight, then serious consideration should be given to establishing a monitoring process. This should take into account whether costs, efforts or advantages of the controls and action being taken balances against potential benefit of achieving the objective.

### Step 4: Review and Report

#### Risk Reviews

It is important to regularly review risks, to determine if there is new information or changing circumstances that may impact the level of risk exposure.

Strategic risks are reviewed quarterly by Directorate Leadership Teams (DLT) and then the Corporate Leadership Team (CLT). Newly identified risks and suggested amendments to strategic risks are reported as part of this process.

Directorate risks are reviewed at least fortnightly by DLTs and CLT.

It is recommended that risk reviews are established within the governance arrangements for all services, programmes and projects with clear protocol for escalation.

Whilst risk reviews occur quarterly it is recommended for risk owners and services to provide additional reports to CLT, outside of the quarterly cycle, where risk scores are not reducing or where circumstances impacting the risk significantly change.

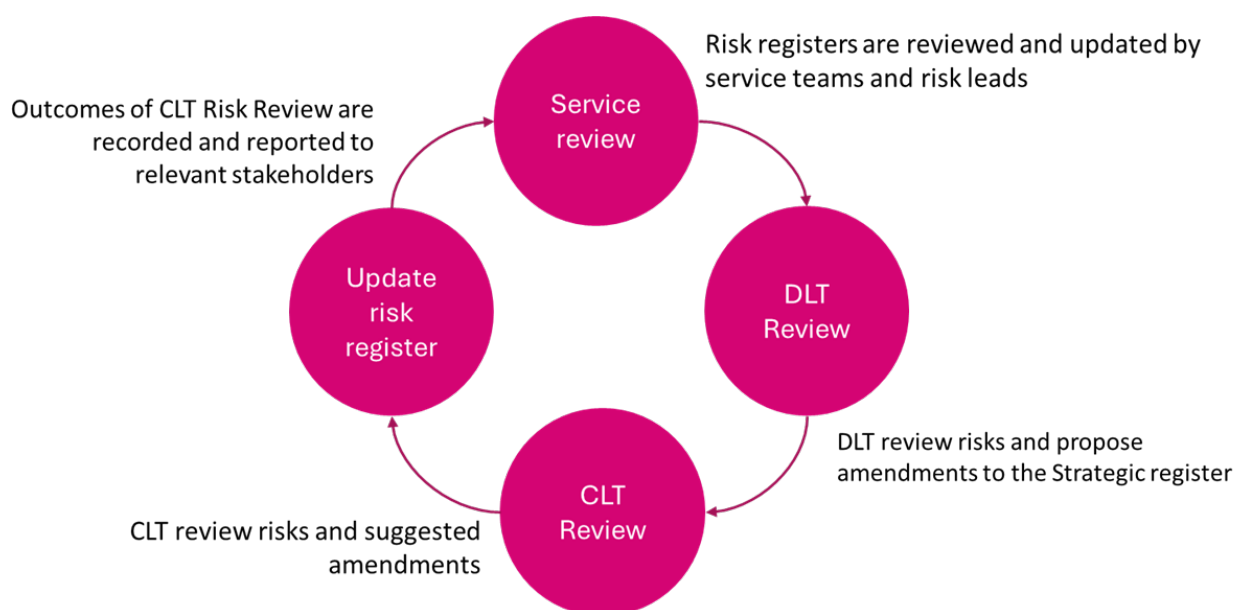


Figure 7: Risk reporting & review cycle



## Risk Reporting

Risk reporting provides a regular mechanism to give updates to key stakeholders, ensuring the right information is given to the right people, at the right level, at the right time. Strategic and directorate risks are recorded and managed corporately on a central register and reported on a quarterly cycle, alongside other key performance data (such as business planning and corporate key performance indicators) to support an ongoing narrative of information.

In doing so risk reporting enhances the quality of organisational decision-making, informs prioritisation of activity, and strengthens organisational oversight.

The benefits of regular risk reporting include:

- > Embedding a consistent understanding of risks, thereby reducing the uncertainty of outcomes
- > Enabling the council to understand the effectiveness of internal controls and take direct, timely and informed interventions as required
- > Integrating risk, planning, performance and prioritisation discussions to enable informed consequence-based decisions
- > Providing assurance to stakeholders, including oversight bodies, that risks are understood and being effectively managed
- > Providing oversight of business activities, enabling a dynamic response to unplanned events threatening delivery of priorities and strategic objectives

A reporting timetable is published annually to inform risk owners and action leads the dates they are required to provide updates to the risk details and actions.

Risk reviews are the best time to ensure risks are considered, although risks must be escalated at any time there is a change to the level of risk exposure.

Strategic risks are reported to Cabinet biannually as part of the Council Plan progress report.

The Risk Management Framework is reported annually to Cabinet, for approval, and Audit, Standards & General Purposes Committee, for the scrutiny and examination of the effectiveness of the council's arrangements for the management of risk.

## Part 2a: Supporting material

### Glossary of terms

Assurance	an evaluated opinion, based on evidence gained from review, on the organisation's governance, risk management and internal control framework.
Current risk score	The assessment of the risk (likelihood x impact) taking into consideration the existing controls already in place. This represents the level of risk exposure the council is currently facing
Exposure	the consequences, as a combination of impact and likelihood, which may be experienced by the council if a specific risk is realised.
Initial risk score	The assessment of the risk (likelihood x impact) before any controls are in place
Internal control	any action, originating within the organisation, taken to manage risk. These actions may address either the potential impact of the risk, should it materialise, or the likelihood/frequency with which the risk occurs.
Risk Appetite	the amount of risk that the council is prepared to accept, tolerate, or be exposed to at any point in time.
Risk assessment	the evaluation of risk with regard to the impact if the risk is realised and the likelihood of the risk being realised.
Risk management	all the processes involved in identifying, assessing and judging risks, assigning ownership, taking actions to mitigate or anticipate them, and monitoring and reviewing progress.
Target risk score	The assessment of the risk (likelihood x impact) taking into consideration the existing controls already in place and on the assumption of all mitigating actions having been delivered

### Risk registers

Risks are recorded in a risk register that captures all the details and provides a simple and effective way to view and prioritise risks. Risk registers can vary in format, however the most frequently used is an excel spreadsheet.

Information and data captured in risk registers can vary and should be proportionate to the potential level of risk exposure to the council. For example, operational risk register may not need to capture oversight arrangements as these will likely be detailed in other places.

A corporate template is available through the [Wave](#) and is designed to capture the below details:

<b>Risk Ref</b>	It is easier to monitor, report and manage multiple risks if they have reference numbers. There is no corporate standard so please use a system that works for your area
<b>What is the risk?</b>	Provide a description of the event or issue that may occur which could prevent achievement of your objective
<b>Risk causes</b>	What are the likely causes, or events, that could make the risk happen
<b>Risk Consequence or Impact</b>	What are the potential consequences or impact if the risk were to happen
	Considering the causes and existing controls in place, what is the likelihood of the risk happening now?
<b>Initial Likelihood (L)</b>	1 – Almost Impossible 2 – Unlikely, 3 – Possible 4 – Likely 5 – Almost Certain
	Considering the consequences, what would be the impact if the risk were to happen now?
<b>Initial Impact (I)</b>	1 – Insignificant 2 – Minor 3 – Moderate 4 – Major 5 – Catastrophic (or Fantastic, if an opportunity)
<b>Initial Risk Score (L x I)</b>	This is the current risk score indicating the likelihood and impact without controls
<b>Existing Controls already in place (BAU)</b>	What existing controls do we already have in place, and functioning, to mitigate this risk?
	Considering the causes and existing controls in place, what is the likelihood of the risk happening now?
<b>Current Likelihood (L)</b>	1 – Almost Impossible 2 – Unlikely, 3 – Possible 4 – Likely 5 – Almost Certain
	Considering the consequences, what would be the impact if the risk were to happen now?
<b>Current Impact (I)</b>	1 – Insignificant 2 – Minor 3 – Moderate 4 – Major 5 – Catastrophic (or Fantastic, if an opportunity)
<b>Current Risk Score (L x I)</b>	This is the current risk score indicating the likelihood and impact before any mitigating actions are taken
<b>Risk Indicator</b>	List how can you monitor the issue to determine if it is more or less likely to occur?
	Is the level of risk exposure increasing, decreasing or the same since it was last reviewed?
<b>Direction of travel</b>	↑ - increasing (the risk score has increased) ↓ - decreasing (the risk score has decreased) ↔ - no change (the risk score has stayed the same)

<b>Risk Treatment</b>	Select how you are going to manage the risk from the 4 T's
<b>Mitigating Actions</b>	<p>If you have decided to treat the risk please provide details of all the actions being taken to reduce likelihood or impact.</p> <p>If you are transferring, tolerating or terminating the risk please provide details.</p> <p>Risk actions should include details of who is responsible for delivering the action.</p>
<b>Action due date</b>	When is the action expected to be completed?
<b>Risk Owner</b>	Who has overall responsibility for managing the risk
<b>Target Likelihood (L)</b>	<p>Considering the causes &amp; controls, what would be the impact if the risk were to happen after we have delivered all mitigating risk actions.</p> <p>1 – Almost Impossible</p> <p>2 – Unlikely,</p> <p>3 – Possible</p> <p>4 – Likely</p> <p>5 – Almost Certain</p>
<b>Target Impact (I)</b>	<p>Considering the consequences, what would be the impact if the risk were to happen after we have delivered all mitigating risk actions.</p> <p>1 – Insignificant</p> <p>2 – Minor</p> <p>3 – Moderate</p> <p>4 – Major</p> <p>5 – Catastrophic (or Fantastic, if an opportunity)</p>
<b>Target Risk Score (L x I)</b>	This is the expected risk score following completion of all mitigating actions or risk treatment
<b>Date Added</b>	When was the risk added to the register
<b>Last reviewed date</b>	When was the risk last reviewed
<b>Status</b>	<p>Select the current risk status. You should not delete risks from register but mark them as closed, terminated or transferred</p> <p>Newly identified</p> <p>Active (ongoing)</p> <p>Closed (no longer a risk)</p> <p>Transferred</p> <p>Terminated</p>

## Risk management training and guidance

Risk management training and guidance is available to all members and officers, resources can be found on the [Wave](#).

## Appendices

### Risk appetite statement

Our risk appetite has been defined following consideration of organisational risks, issues and consequences. Given the complexities of Local Government and the wide array of services delivered by the council, it is not appropriate to define a single risk appetite that can be applied across the organisation.

Appetite levels will vary, in some areas the council will be cautious, in others it will be open to risk and willing to carry a higher level of uncertainty in the pursuit of its intended outcomes.

The council has described its appetite across core risk categories, detailed below, and sets target scores at its tolerable level.

We will always aim to operate organisational activities at those defined levels. Where activities exceed the defined levels, or a risk is outside its defined tolerance, this must be managed through appropriate governance mechanisms.

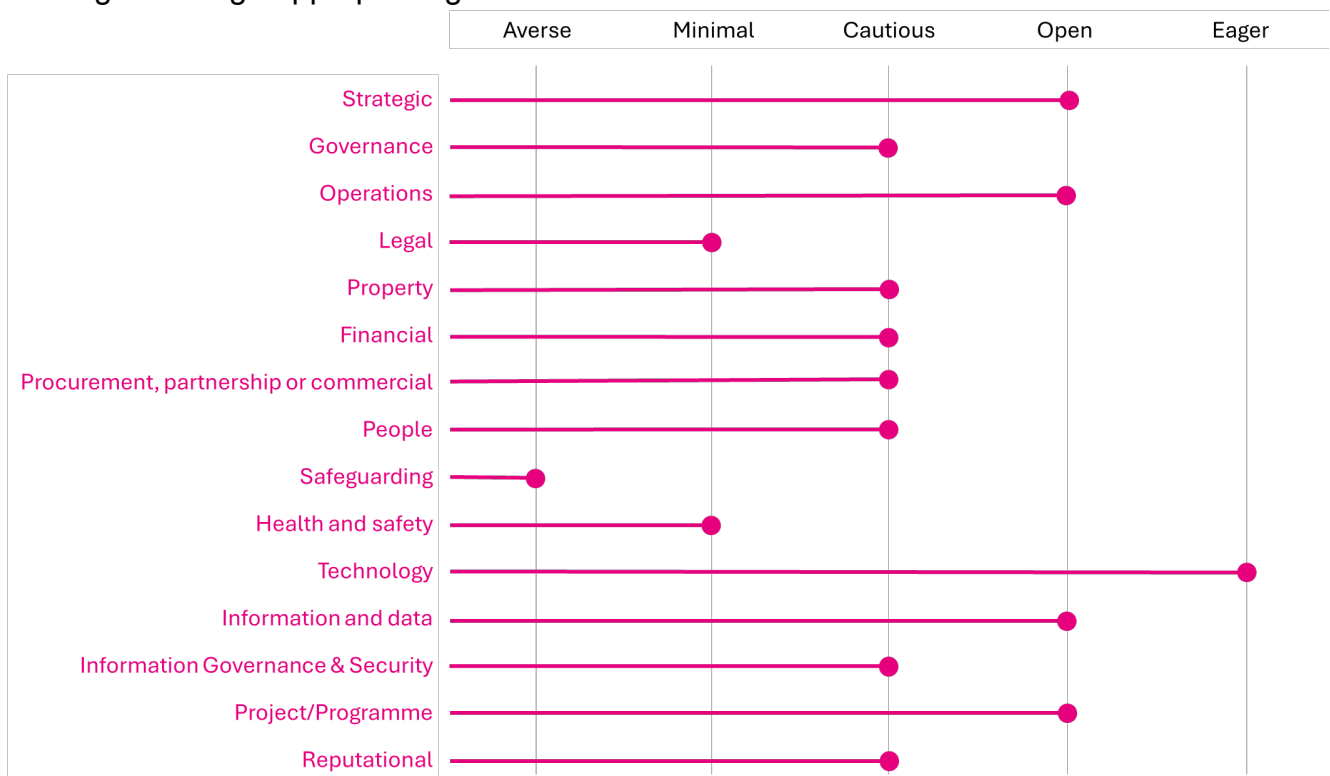


Figure 8: Visual of the council's risk appetite across the core risk categories

Governance	Cautious
<p>The Council recognises that strong governance is fundamental to achieving its strategic objectives, maintaining stakeholder trust and meeting its statutory requirements. However, it seeks governance innovation and process improvements that enhance efficiency and effectiveness. As such it has a <b>cautious</b> appetite for risk in relation to its governance arrangements, systems of internal control and assurance.</p> <p>This means the Council:</p>	

<ul style="list-style-type: none"> <li>• will not tolerate risks that could lead to failures in oversight, accountability, or decision-making processes or conflicts of interest that compromise integrity or transparency.</li> <li>• is willing to revise governance arrangements to enhance agility and responsiveness, while maintaining clear accountability.</li> <li>• is willing to adopt new technologies, or approaches, that may hold initial uncertainty but aim to strengthen governance outcomes</li> </ul>	
<b>Legal</b>	<b>Minimal</b>
<p>The Council has a <b>minimal</b> appetite for legal risk</p> <p>This means the Council:</p> <ul style="list-style-type: none"> <li>• Will not tolerate breaches of statutory or regulatory obligations,</li> <li>• will prioritise rigorous legal review, compliance monitoring, and risk mitigation strategies to avoid litigation, penalties, or reputational harm</li> <li>• will not knowingly undertake any activity that breaches law, statutory obligations, or actions leading to criminal liability, fraud, or corruption.</li> </ul>	
<b>Property</b>	<b>Cautious</b>
<p>The Council has a <b>cautious</b> appetite for risks that may impact our ability to manage council property (including housing, commercial and operational property) and deliver new housing supply.</p> <p>This means the Council:</p> <ul style="list-style-type: none"> <li>• prioritises resources on compliance with all regulatory and legislative requirements</li> <li>• adopts a range of agreed solutions for the purchase, rental, disposal, construction and refurbishment that ensures meeting our requirements</li> <li>• focuses resources on the prevention of homelessness and meeting its housing duty</li> <li>• will accept a moderate level of risk exposure in delivering new housing supply</li> <li>• will consider low risk actions which support delivery of housing priorities and objectives with robust controls, oversight and monitoring arrangements in place</li> </ul>	
<b>Financial</b>	<b>Cautious</b>
<p>The council has a <b>cautious</b> appetite for financial risks and puts in place appropriate controls through governance, policies, and procedures to manage risk.</p> <p>This means the Council:</p> <ul style="list-style-type: none"> <li>• has strong governance in place for investment capital</li> <li>• limits delegation of making significant financial decisions</li> <li>• has robust policies and procedures for financial planning, management and reporting</li> <li>• will consider options to invest and funding for delivery of modernisation and invest-to-save proposals</li> <li>• will consider value for money and tangible benefits (cashable and otherwise) to achieve service benefits and deliver a sustainable solution (not always select the cheapest option)</li> </ul>	
<b>Procurement, partnership or commercial</b>	<b>Cautious</b>
<p>The council has a <b>cautious</b> appetite for procurement, partnership, and commercial risk</p> <p>The means the council:</p>	

<ul style="list-style-type: none"> <li>• will balance risk with reward through robust due diligence, clear contracts, and ongoing performance management.</li> <li>• is open to innovative partnerships and commercial deals that offer cost-effective solutions, enhance services, and generate economic and social value</li> <li>• is willing to consider a higher level of risk where these activities align with our strategic objectives, enhance service delivery, and create new opportunities for the community.</li> </ul>	
<b>People</b>	<b>Cautious</b>
<p>The council has a ‘cautious’ to ‘open’ appetite for risks that may impact our ability to deliver services to our customers or adversely impact our capability to deliver services. The council is <b>cautious</b> in respect of any risk that may impact its ability to deliver essential services but is more open to risk when exploring innovation and modernisation opportunities.</p> <p>This means the Council:</p> <ul style="list-style-type: none"> <li>• will not tolerate breaches of employment legislation, HR policies, or health and safety regulations.</li> <li>• will not knowingly take actions that compromise equality, diversity, inclusion, or safeguarding standards</li> <li>• will not tolerate inappropriate behaviours or culture that undermine integrity or public trust</li> <li>• will explore new workforce models, organisational change, or cultural initiatives where risks are understood, mitigated, and supported by robust HR policies, engagement, and communication</li> <li>• will look to take initiatives that improve leadership capability, staff development, and engagement, provided risks are proportionate and controls are in place.</li> </ul>	
<b>Safeguarding</b>	<b>Averse</b>
<p>The Council has an <b>averse</b> appetite for risks materialising that are associated with preventable deaths, serious injury or serious harm to vulnerable adults, children, and young people that we have responsibility for.</p> <p>This means the Council:</p> <ul style="list-style-type: none"> <li>• have robust recruitment processes which incorporate safeguarding requirements such as disclosure and barring service (DBS) checks, checking references, proof of qualification and professional registration.</li> <li>• has clear and well communicated policies and procedures</li> <li>• monitors meaningful performance metrics to act as early warning signs</li> <li>• Has professional oversight, in terms of staff supervision and inspections by the Care Quality Commission and Ofsted.</li> <li>• maintains up to date and accurate risk records in relation to safeguarding adults and safeguarding children</li> <li>• works in partnership with key organisations to monitor safeguarding delivery across all agencies in the city</li> <li>• has strong controls in place to ensure any organisations delivering services on behalf of the council have robust safeguarding arrangements in place</li> </ul>	
<b>Health &amp; Safety</b>	<b>Minimal</b>
<p>The council has a <b>minimal</b> appetite to any risk that may impact the health and safety of customers or council officers and prioritises taking proportionate action to mitigate risk.</p>	



<p>The means the council:</p> <ul style="list-style-type: none"> <li>• focuses action on risks which have potential to cause serious injury or harm to customers and council officers</li> <li>• adopts a sensible approach, in relation to resources, for all other risks</li> <li>• takes proportionate action to minimise the potential for injury or harm to the lowest possible level</li> <li>• has policies, procedures and governance in place to provide robust oversight of health &amp; safety in service delivery</li> <li>• promotes a culture of health &amp; safety, including mental health and wellbeing, throughout the council</li> </ul>	
<b>Technology</b>	<b>Eager</b>
<p>The council has an <b>eager</b> appetite to risk when investing in and maximising use of technology.</p> <p>The means the council:</p> <ul style="list-style-type: none"> <li>• sufficiently invests in foundational technology to ensure that the IT infrastructure is capable to support use of technologies</li> <li>• ensures staff have the systems and devices to deliver services</li> <li>• is open to investment and use of modern technology to improve customer outcomes</li> <li>• invests in the development of council officers, managers and leaders to maximise the use of technology in the provision of services</li> </ul>	
<b>Information and data use</b>	<b>Open</b>
<p>The council has an <b>open</b> appetite for risk related to the management and use of data and information.</p> <p>The means the council:</p> <ul style="list-style-type: none"> <li>• is willing to accept a higher level of risk in the innovation and improvement in the management, sharing, and utilisation of data and information assets</li> <li>• will actively look to explore and adopt innovative data-driven technologies and practices (e.g. AI, data analytics, open data portals).</li> <li>• Seeks out potential digital transformation and data integration projects that improve efficiency and outcomes</li> </ul>	
<b>Information Governance &amp; Security</b>	<b>Cautious</b>
<p>The council has a <b>cautious</b> appetite for information governance and security risks with strong policies and procedures in place.</p> <p>The means the council:</p> <ul style="list-style-type: none"> <li>• ensures our IT infrastructure meets UK and international regulatory standards</li> <li>• is unwilling to have any risk exposure related to customer and staff data</li> <li>• embed comprehensive procedures for the identification and resolution of incidents that present a threat to information security</li> <li>• is willing to share data, within a controlled framework, for the benefit of customer outcomes</li> </ul>	
<b>Transformation</b>	<b>Open</b>
<p>The council has an <b>open</b> appetite to risk when exploring innovation opportunities, however it recognises the successful delivery of Council Plan outcomes will require associated programmes and projects being delivered on time and to budget.</p>	

<p>The means the council:</p> <ul style="list-style-type: none"> <li>• is willing to except a higher level of uncertainty to achieve its objectives</li> <li>• requires business cases that are properly costed with clearly defined outcomes and benefits.</li> <li>• provides appropriate challenge to ensure that any investment offers the best possible return and value for money</li> <li>• requires project and programme risks to be identified and managed in accordance with the Council’s Risk Management Framework.</li> <li>• will escalate any high or very high risks which exceed the Council’s risk appetite by the relevant corporate directorate management team. Where appropriate this may involve escalation to the Corporate Management Team.</li> <li>• Benefits realisation and lessons learnt should be completed following major programme and project work.</li> <li>• All major projects will be RAG rated with the appropriate level of governance, scrutiny, and reporting in place for projects assessed as high risk.</li> </ul>	
Reputational	Cautious
<p>Due to the nature of the council’s business, a certain degree of risk taking is required, therefore the council has a <b>cautious</b> appetite for risks which may negatively impact on the council’s reputation or the community’s trust in our ability to lead the city.</p> <p>This means the Council:</p> <ul style="list-style-type: none"> <li>• proactively engages with the community in significant changes or key decisions</li> <li>• is open, honest and transparent in its decision making</li> <li>• is willing to take decisions with limited potential to expose the council to additional scrutiny, but only with strong controls and governance in place to minimise risk exposure</li> <li>• accepts moderate level of local media and social media scrutiny or complaints relating to actions, or decisions, which deliver longer benefits to the community</li> </ul>	

The areas included in the above table are not intended to be an exhaustive list of statements. Risk appetite statements are developed as required and reviewed on an annual basis.

# Brighton & Hove City Council

## Cabinet

## Agenda Item 105

**Subject:** Devolution Update

**Date of meeting:** Thursday 22 December 2026

**Report of:** Leader of the Council

**Lead Officer:** Chief Executive

**Contact Officer:** Name: Tom Cottam

**Email:** tom.cottam@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 In October 2025 Cabinet agreed to provide its consent, with authority delegated to the Chief Executive, to the laying of the necessary Statutory Instrument by Government that would provide the legal force to create a new Sussex and Brighton Combined County Authority (SBCCA) with mayoral elections scheduled for 7<sup>th</sup> May 2026. The Government also previously confirmed that the SBCCA would receive an annual Investment Fund of £38 million for 30 years following the election of a mayor.
- 1.2 On 4<sup>th</sup> December 2025, the Parliamentary Under Secretary of State for Devolution and Faith Communities, Miatta Fahnbulleh MP, wrote to the Leaders of Brighton and Hove City Council (BHCC), West Sussex County Council (WSCC) and East Sussex County Council (ESCC) (appendix 1) to set out the Government's intention to continue with the establishment of a Mayoral Strategic Authority in Sussex and Brighton from 2026, but to postpone the mayoral elections in 4 Devolution Priority Programme (DPP) areas, including Sussex and Brighton, until 2028. The letter also included changes to the schedule of Investment Fund payments.
- 1.3 In light of these changes, an amended Statutory Instrument to create the SBCCA will be issued by the Government, for constituent councils to agree. The purpose of this report is to update Cabinet on these developments, set out the implications for BHCC where they differ from the previous report to Cabinet - [Devolution for Sussex Brighton.pdf](#) - and seek renewed approval in principle to consenting to devolution in the terms outlined.

## **2. Recommendations**

- 2.2 That Cabinet notes the content of this report, including the assessment of the implications for Brighton & Hove City Council of creating a new Sussex and Brighton Combined County Authority with a delay to the election of a mayor.
- 2.2 That Cabinet confirms its approval in principle to consenting to devolution and delegates authority to the Chief Executive, in consultation with the Leader, to undertake all steps necessary to provide consent on behalf of the Council to the Statutory Instrument that the Government proposes to lay before Parliament to create a new Sussex and Brighton Combined County Authority.
- 2.3 That Cabinet delegates authority to the Chief Executive, in consultation with the Leader, to approve any technical amendments to the Statutory Instrument on behalf of the Council.
- 2.4 That Cabinet agrees the proposed local 2-year Memorandum of Understanding for financial contributions and liabilities in establishing the Sussex and Brighton Combined County Authority as set out in appendix 3.

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

- 3.1 In December 2024, the Government published the English Devolution White Paper outlining its vision, priorities and plans for devolution in England. In February 2025, an application from WSCC, ESCC and Brighton and BHCC to join the DPP and to establish a Mayoral Combined County Authority (MCCA) for the Sussex and Brighton region was accepted by the Government.
- 3.2 In July 2025, following a public consultation, the Government confirmed that the proposal to create an MCCA for Sussex and Brighton had met the statutory tests and that it would move forward with mayoral elections scheduled for May 2026. In October, all three constituent councils agreed, via delegated authority to Chief Executives, to consent to the laying of a Statutory Instrument to create the new SBCCA.
- 3.3 On 4<sup>th</sup> December 2025, the Parliamentary Under Secretary of State for Devolution and Faith Communities, Miatta Fahnbulleh MP, wrote to the Leaders of BHCC, WSCC and ESCC (appendix 1) to set out the Government's intention to continue with the establishment of a Mayoral Strategic Authority in Sussex and Brighton from 2026, but to postpone the mayoral elections in 4 DPP areas, including Sussex and Brighton, until 2028.
- 3.4 The effect of this change would be that once the English Devolution and Community Empowerment Bill is passed and prior to the election of a mayor in May 2028, the new SBCCA would have access to those powers available to a Mayoral Strategic Authority, bar those that are only exercisable by a mayor. These are set out below in section 3.10.

- 3.5 The Government also confirmed that in light of the postponement of the elections, DPP areas that would now elect a mayor in 2028 would receive one third of their total allocated Investment Fund in the years 2026/2027 and 2027/2028. The reason provided by Government for postponing the elections was to allow for the completion of local government reorganisation in advance of the election of a mayor.
- 3.6 Subject to the consent of the three constituent councils, the Statutory Instrument will be laid in Parliament imminently and will be debated by both Houses. If approved, it is anticipated that it will take effect in Spring 2026.
- 3.7 Despite the postponement of the mayoral election and a reduction in Investment Fund available in the next 2 financial years, BHCC continues to believe that moving forward with the creation of a new SBCCA at the earliest opportunity represents a significant opportunity for Brighton and Hove and the wider region. A new SBCCA would still benefit from significant powers ahead of a mayoral election with the opportunity to take a more strategic approach to transport, develop a regional plan for growth, take responsibility for adult skills funding and take action on carbon reduction. The region would also still receive over £12 million a year in new investment funding.

### **Changes to the Statutory Instrument**

- 3.8 The Statutory Instrument (SI) will be called *The Sussex & Brighton Combined County Authority Regulations 2026*. Under parliamentary procedure for the introduction of legislation, the full and final text of the SI would be made public at the point it is laid in Parliament. To support Cabinet decision-making, a breakdown is provided that sets out the functions which will be available to the SBCCA ahead of the inaugural election, through both the SI and the English Devolution and Community Empowerment Bill, once it receives Royal Assent, and the powers and functions which will be reserved to the Mayor (Appendix 2). This summary was produced by government officials and represents their current understanding ahead of the publication of the SI.
- 3.9 The effect of the previous version of the SI was set out in detail in the previous report to Cabinet. The current proposed changes to the amended SI are as follows:
- Changing the date of the inaugural mayoral election from 7<sup>th</sup> May 2026 to 4<sup>th</sup> May 2028.
  - Extending the transitional period during which requirements relating to the production of a Local Transport Plan will be held concurrently by the CCA and constituent authorities from 31<sup>st</sup> March 2027 to the 31<sup>st</sup> March 2028.
  - Changing the date at which point Part 5 (Mayoral functions) comes into force from 11<sup>th</sup> May 2026 to 8<sup>th</sup> May 2028.

- Amendments to ensure that the SBCCA will have the ability to approve a Local Transport Plan before the mayor is in place.
- 3.10 As set out previously, should all three constituent councils consent to the laying of the SI, it will then need to be debated in and approved by both Houses of Parliament. Parliament can only approve or reject SIs; it is not possible for them to be amended once they have been laid. Parliament is allowed up to 8 sitting weeks in which to approve the SI, and it is expected that this process would be completed at some point in Spring 2026, at which point the SBCCA would formally come into existence.
- 3.11 The delay to the Mayoral Election has created some additional drafting challenges with the SI which MHCLG are addressing and which the Council will be reviewing before consent is formally given.

### **Changes to the impact of the English Devolution and Community Empowerment Bill**

- 3.12 The effect of the devolution aspects of English Devolution and Community Empowerment Bill and powers it would convey on a Mayoral Strategic Authority were set out in detail in the previous report to Cabinet. The implication of the recent government announcement to postpone the mayoral election until 2028 is that those powers that are exercisable only by the mayor would not be available until after the election. Those powers include:
- Key Route Network power of direction
  - Decision on whether to make a proposed franchising scheme
  - Spatial Development Strategy (clause 52 of the Planning and Infrastructure Bill: Part 1A of the Planning and Compulsory Purchase Act 2004) (An MSA would be able take steps to prepare an SDS prior to a mayoral election but it could only be signed-off once a mayor is in place)
  - Compulsory purchase powers under the Housing and Regeneration Act 2008 and Housing Act 1985 (Clause 34, 35 and Schedule 15, 16)
  - Power to convene and duty to respond
  - Duty to collaborate
  - Strategic Development Management Powers
  - Mayoral Development Orders
  - Mayoral Development Corporations
  - Mayoral Community Infrastructure Levy
  - Mayoral Council Tax Precept
  - Police and Crime Commissioner and Fire and Rescue Authority functions (subject to secondary legislation).
- 3.13 The English Devolution and Community Empowerment Bill seeks to move Mayoral elections from the current First Past the Post voting system to the Supplementary Vote system. The Government had confirmed that given the expected timescales for passing the Bill, mayoral elections planned for 2026 would have been conducted using First Past the Post. Subject to the Bill receiving parliamentary approval, it expected that mayoral elections that

take place in 2027 and beyond, including an election in Sussex and Brighton, will be conducted using the Supplementary Vote system.

### **Investment Fund**

- 3.14 Prior to the decision taken by Cabinet in October 2025 to consent to the creation of the SBCCA, Ministers had provided written confirmation that the Authority would receive a £38 million a year 30-year Investment Fund following the election of a mayor in 2026. In the letter on 4th December setting out the intention to postpone the mayoral until 2028, the Minister confirmed that the SBCCA would receive one third of its total allocated Investment Fund in the years 2026/2027 and 2027/2028 rising to the full allocation following the mayoral election. The fund will be split 50/50 between capital and revenue spend.

### **Proposed agreement on financial contributions and liabilities**

- 3.15 The SI includes a provision that the Constituent Authorities must meet the costs of expenditure associated with the exercise of its functions where these costs are not met from other resources available (such as the Investment Fund). Where these are related to mayoral functions, the Mayor, once in place, must agree with the CCA the total expenditure in advance of incurring such expenditure, and in the absence of such agreement, no such expenditure may be incurred.
- 3.16 It is anticipated that, as has been the case for existing combined authorities, any cost associated with the delivery of SBCCA functions will be met by resources available to the SBCCA, such as the Investment Fund, the promised £4 million in capacity funding or by top-slicing grant funding. In the unlikely event of an overspend, the SI makes provision for Constituent Authorities' contributions to be apportioned either through a mechanism of their own agreement or, if no local agreement is in place, based on the number of their residents as a proportion of the total population of the CCA area.
- 3.17 To make arrangements for how any overspend by a future SBCCA would be dealt with, an MOU has been drafted setting out that each constituent council would contribute one third towards the total cost of the overspend. This agreement aligns with the voting arrangements set out in the SI that provides for each Constituent Authority to have one third of the votes. Considering the low level of risk of an overspend and on the basis that this is a time-limited arrangement that will lapse in 2028 upon the vesting of new Unitary Authorities in Sussex following local government reorganisation, it is recommended that Cabinet agrees to this arrangement. The MOU is attached at Appendix 3 and the full risk implications and mitigations are set out below at paragraph 8.

### **Establishment of Devolution Delivery Programme**

- 3.18 Prior to the Government announcement to postpone the election, significant progress had been made to lay the foundations for the creation of a new



authority in Sussex and Brighton. This work continues at pace. Following the appointment of an interim Chief Officer for the shadow SBCCA, a Devolution Delivery Programme has been established to oversee the creation of the SBCCA. The interim Chief Officer is currently assembling a Programme Delivery Team to lead delivery of critical workstreams and work alongside the Constituent Authorities and other partners as part of a Devolution Delivery Programme Board. An Informal Partnership Board and a Stakeholder Forum have also been established to ensure effective engagement with stakeholders from across Sussex.

- 3.19 The early priority workstreams of the Devolution Delivery Programme include governance, organisational design, strategy and policy, communications and engagement, and finance. The Programme Delivery Team are in the process of developing a governance framework and an implementation strategy as well as other critical policies and processes. A two-day policy 'sprint' involving over 80 council officers and stakeholders from across Sussex was held in early December to start the work to develop a prosperity strategy for the new SBCCA.

#### **Development of a Local Assurance Framework**

- 3.20 Before the investment funding can be released and before the SI can take effect, it is necessary for Constituent Authorities to agree a Local Assurance Framework (LAF) with MHCLG. The purpose of the LAF is to set out how the new SBCCA will use public money responsibly, openly and transparently, and achieve best value for money. The LAF is a legal requirement.
- 3.9 An early draft LAF was submitted to MHCLG in November 2025 for initial feedback from government departments. A final draft of the LAF will be submitted on behalf of Constituent Authorities by 16th January 2026 to meet the deadlines set by Government.

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

- 4.1 The alternative to the recommendation to consent in principle to the laying of the amended SI outlined above is to refuse consent to move forward with devolution in Sussex and Brighton, which would have a number of negative impacts. This would include preventing or delaying the predicted benefits of devolution and the flow of new funding and powers from Government to Sussex and Brighton, including the new investment provided by the 30-year Investment Fund.
- 4.2 Alternative approaches to how Constituent Authorities meet the cost of an overspend were considered. Principally, this included arrangements based on population. Given the disparities in the populations of the Constituent Authorities and in the interest of partnership working it was felt that the approach set out in the MOU was appropriate for the interim period until April 2028 and the creation of new Unitary Authorities following local government reorganisation.

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

- 5.1 National government undertook an 8-week public consultation from 17 February to 13 April 2025 to engage and seek responses from a range of interested parties across the region.

## **6. Financial implications**

- 6.1 The reduction in the anticipated level of Investment Funding over the next two financial years from £38 million a year to a third of that amount will mean less funding in that period to spend on regionally agree priorities to drive economic growth, creation jobs and strengthen public services.
- 6.2 The postponement of the mayoral election until 2028 will postpone the previously estimated cost of delivering an election in 2026. These costs are anticipated to be met from resources available to the SBCCA. Any costs incurred by Local Returning Officers due to the cancellation will be assessed on their merit and reimbursed from capacity funding if necessary. BHCC has not incurred additional election costs.
- 6.3 The costs associated with the delivery of SBCCA functions prior to the mayoral elections will be met by resources available to the SBCCA, such as the Investment Fund, capacity funding or by top-slicing grant funding streams. The budget for any forthcoming year will need to be agreed with the Constituent Authorities in advance.
- 6.4 The proposed funding arrangements for the new SBCCA set out in the draft MOU are time-limited but could result in an additional cost burden to this council in the unlikely event of an overspend. The current default mechanism set out in the Statutory Instrument based on population would require BHCC to make a contribution of circa 16% of the total. The proposed change would increase that contribution to a third of the total in line with Constituent Authority representation in the SBCCA. The new authority will have governance arrangements in place to mitigate any risks of additional financial burden. Further risk mitigations are described in section 8 – Risk implications.

Name of finance officer consulted: James Hengeveld

Date consulted: 16/12/2025

## **7. Legal implications**

- 7.1 The current statutory provisions for the establishment of a CCA are set out in section 46 of the Levelling Up and Regeneration Act 2023. These include the requirement for each of the constituent authorities to consent to its establishment before the Secretary of State can make the necessary regulations, together with the need for consultation and for the Secretary of State to be satisfied of the relevant tests. The consultation was carried out as indicated in this report from February to April 2025, and the MHCLG confirmed its view that the relevant tests had been met in July 2025.

- 7.2 The report sets out a summary of the proposed Statutory Instrument, as amended, which will need to be approved by Parliament before the CCA can be established.
- 7.3 The decision to consent to the establishment of the CCA is an executive function and as a key decision ordinarily needs to be exercised by the Cabinet. The recommendations to this report reflect the MHCLG's preference for this decision to be delegated to the council's Chief Executive, to ensure that it can be made in a timely way once all the details have been clarified. This delegation is enabled by section 9E of the Local Government Act 2000.

Name of lawyer consulted: Elizabeth Culbert

Date consulted: 12/01/26

## **8. Risk implications**

- 8.1 A key risk is that one or more of the Constituent Authorities do not provide their consent to the creation of the new SBCCA under the new terms set out by the Government. This could delay or ultimately prevent the creation of the new authority and the devolution of relevant powers and funding.
- 8.2 As a result of the recommendation to agree local arrangements for how Constituent Authorities meet the cost of an overspend, there is risk of a greater cost burden to BHCC. However, it is assessed that the risk of overspend is low and BHCC have agreed a range of mitigations with other Constituent Authorities. These are set out in the MOU and include the following:
- The establishment of a clear process for monitoring the financial position of the Combined County Authority by the constituent councils, including regular reporting and forecasting.
  - The proactive management of budget forecasting will be managed proactively, with action taken before any overspend occurs.
  - The formal review of the arrangement in 2028, following local government reorganisation and the establishment of new Unitary Authorities. In the absence of agreement by all Constituent Authorities the arrangement will revert to the mechanism stated in the SI with contributions to be determined in accordance with population.
  - The option for any constituent council to call for a review of the funding arrangement if its financial position changes and it is unable to support additional costs.
  - Agreement that any contribution to overspend must not place any constituent council in financial jeopardy.
- 8.3 The risk of not agreeing to this recommendation would be to undermine efforts to establish trusting and collaborative relationships with other

Constituent Authorities as we embark on the important work of creating the new SBCCA.

## **9. Equalities implications**

9.1 As part of the Public Sector Equality Duty under the Equality Act 2010, the council must seek to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
- advance equality of opportunity between people who share a protected characteristic and those who do not; and
- foster good relations between people who share a protected characteristic and those who do not.

9.2 It is not anticipated that the recommendations in this report will result in disproportionate impacts for any specific group sharing any of the legally protected characteristics.

Name of equalities officer consulted: Deborah Totney  
Date consulted: 16/12/25

## **10. Sustainability implications**

10.1 The previous report to Cabinet set out the sustainability impacts of consenting to the creation of the SBCCA on the terms understood at the time. It is not anticipated that the likely impacts will be different as a result of the changes set out by Government.

## **11. Health and Wellbeing Implications:**

11.1 The previous report to Cabinet set out the health and wellbeing impacts of consenting to the creation of the SBCCA on the terms understood at the time. It is not anticipated that the likely impacts will be different as a result of the changes set out by Government.

## **12. Crime & disorder implications:**

12.1 The transfer of Police and Crime Commissioner functions to the newly elected mayor was due to take place in May 2027. Subject to secondary legislation, this transfer will now not take place until a mayor is elected in May 2028.

## **13. Staff implications**

13.1 Where staffing changes are needed, we are committed to an open and inclusive approach to working through impacts. This will include engagement with affected services, trade unions, and staff, the establishment of a clear plan to oversee workforce implications, and the development of specific proposals, which will be prepared in line with BHCC's normal processes for managing change.

## **14. Conclusion**

- 14.1 Brighton and Hove City Council is committed to devolution for Sussex and Brighton to unlock powers and funding to deliver significant benefits for the residents of the City and wider region. The Government's decision to postpone the mayoral election does not diminish that commitment. We are still on course for the creation of a Sussex and Brighton Combined County Authority with access to significant additional powers and new funding in 2026. Good progress has been made working with partners across the region to prepare for devolution to ensure a new authority is ready to deliver for residents from day one.

## **Supporting Documentation**

### **1. Appendices**

1. Letter from Miatta Fahnbulleh MP, Parliamentary Under Secretary of State for Devolution and Faith Communities.
2. Breakdown of the functions which will be available to SBCCA.
3. Memorandum of Understanding - Financial Contributions and Liabilities in establishing the Sussex and Brighton Combined County Authority.



Ministry of Housing,  
Communities &  
Local Government

**Miatta Fahnbulleh MP**  
*Parliamentary Under Secretary of  
State for Devolution, Faith and  
Communities*  
**Ministry of Housing,  
Communities &  
Local Government**  
2 Marsham Street  
London SW1P 4DF

Cllr Bella Sankey  
Cllr Keith Glazier  
Cllr Paul Marshall

4<sup>th</sup> December 2025

### **Update on the Devolution Priority Programme**

Thank you for speaking with me on 3 December. I am grateful to you for finding time at short notice.

As discussed, this Government is committed to extending and deepening devolution across England. For too long decisions have been made centrally in Whitehall, away from the places and communities those decisions impact.

Today, I issued a written ministerial statement reconfirming our commitment to the Devolution Priority Programme, including investment funds and next steps towards the establishment of the Sussex and Brighton Mayoral Strategic Authority

Following our appointments earlier in the autumn, the Secretary of State, Minister for Local Government and I have taken the opportunity consider the most effective way to ensure Mayoral Strategic Authorities are best placed to deliver. We believe that devolution works best when it is built on strong foundations, and so moving forward, I intend to align mayoral devolution in the Devolution Priority Programme areas with the establishment of new unitary authorities following local government reorganisation.

I have therefore informed Parliament today that we are minded to hold inaugural Mayoral election in Sussex and Brighton in May 2028, in order to complete the reorganisation process before Mayors take office. I recognise that this will be disappointing news and I am grateful for the work you have put into this Programme to date. I want to assure you the Government's intention is firmly to preserve this progress and ensure your area can still benefit from devolution as soon as possible, including in advance of the Mayoral election.

While recognising that you will need time to consider today's announcements, we are keen to move as quickly as possible to ensure that you can continue to make progress on building the new institution, and start delivering on our shared priority: driving growth across Sussex and Brighton. Consequently, today's announcement confirmed that we will ensure the new institution is able to start investing in local growth priorities in the years prior to the election of the Mayor,

including through the government providing one third of the annual value of your Investment Funds in 2026-27 and 2027-28.

Prior to the election of the Mayor, you will also be able to make use of a range of devolved powers to drive your priorities, including around the development of Local Growth Plans, transport and adult skills. Following the Mayor's election, as previously committed, you will then receive £38 million per year, split equally between resource and capital.

In addition – in order to support you to develop your institution's capacity to develop and deliver growth in your region – today's announcement confirms that we will provide £3 million as a minimum flat payment over the next three financial years, in addition to an initial payment of £1 million when the statutory instruments are laid in Parliament. This funding is intended to help with the costs of establishing your new Mayoral Strategic Authority and ensuring your area can benefit from devolution as soon as possible.

In order to unlock your ability to set up the new institution and begin delivering for your area, we of course need to lay the statutory instrument setting up the new Strategic Authority. The government stands ready to progress this as quickly as possible over the coming weeks, subject to your consent and local processes.

I suggest we arrange a further meeting next week, with you all collectively, to discuss how we can maintain momentum on establishing the Sussex and Brighton Mayoral Strategic Authority and driving growth for your region, and in particular the timing of laying the statutory instruments.

I am copying this letter to the Members of Parliament, District Council leaders and Police and Crime Commissioner in your area.

**Yours sincerely**

A handwritten signature in black ink, appearing to read 'Miatta Fahnbulleh', with a stylized, sweeping flourish extending to the right.

**MIATTA FAHNBULLEH MP**

Parliamentary Under-Secretary of State for Devolution, Faith and Communities

<b>Functions the CA will have through the SI</b>	<b>Functions the CA will have through the Bill</b>	<b>Mayoral functions</b>
Development of Local Transport Plans (s108, 109 and 112 of the Transport Act 2000) – see also clause 29 and schedule 9 of the Bill.	The General Power of Competence	Key Route Network designation – but not power of direction  Decision on whether to make a proposed franchising scheme.
Power to pay grant (s31 of the Local Government Act 2003) – a similar power is provide through clause 39 of the Bill	Local Transport Authority Functions, including powers and duties to prepare a bus strategy for carrying out their bus functions, enter into partnerships with bus operators and manage travel concessions - except local transport plans which are exercisable only by the mayor in the Bill but are separately provided for in the SI	Spatial Development Strategy (clause 52 of the Planning and Infrastructure Bill: Part 1A of the Planning and Compulsory Purchase Act 2004)
Data sharing (s17A Crime and Disorder Act 1998) - also clause 48 of the Bill	Transport Levy	Compulsory purchase powers under the Housing and Regeneration Act 2008 and Housing Act 1985 (Clause 34, 35 and Schedule 15, 16)
Incidental provisions (s142(2) and s222 of the Local Government Act 1972) – also clause 42 and Schedule 20 of the Bill	Agreements between authorities and strategic highways companies	Power to convene and duty to respond
Economic development and regeneration power of competence (s1 of Localism Act 2011 to the extent that those functions are exercisable for the purpose of economic development and regeneration) - also clause 20 and schedule 4 (not limited to economic development and regeneration)	Civil enforcement of road traffic contraventions	Duty to collaborate
	Transfer of duty of principal councils to make	Key Route Network power of direction



	reports on Key Route Network roads	
	Road User Charging	Strategic Development Management Powers - can't be used without SDS in place anyway
	On-Street Micromobility Schemes	Mayoral Development Orders
	Adult Education Functions – but subject to transition period	Mayoral Development Corporations
	Some housing and land powers, including compulsory purchase powers under the Town and Country Planning Act 1990 - excluding compulsory purchase powers under Housing and Regeneration Act 2008 and Housing Act 1985	Mayoral Community Infrastructure Levy - can't be used without SDS in place anyway
	Power to borrow up to an agreed cap	Mayoral Council Tax Precept (clause 11)
	Local Growth Plans	PCC and FRA functions – subject to further secondary legislation
	Duty to prepare an assessment of economic conditions	
	Powers to encourage visitors and provide entertainment	
	Power to place staff at the disposal of other authorities	
	Research and collection of information	
	Heat Network Zoning coordination role (s228(5) of the Energy Act 2023)	
	Bespoke health improvement and health inequalities duty	
	Sharing of information in relation to crime and disorder	
	Functions that may arise from the designation of the MSAs as a civil enforcement area for bus lane contraventions	







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## Memorandum of Understanding

### Financial Contributions and Liabilities in establishing the Sussex and Brighton Combined County Authority

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#### Purpose

This Memorandum of Understanding (MoU) sets out the agreed position of East Sussex County Council, West Sussex County Council, and Brighton & Hove City Council (hereafter referred to as 'the constituent councils') regarding the apportionment of financial contributions and liabilities under Clause 12(3) of the draft Statutory Instrument (SI) for the establishment of the Sussex & Brighton Combined County Authority (CCA).

#### Background

The Sussex and Brighton Combined County Authority constitution must set out that each constituent authority must appoint two members to join the Combined County Authority (CCA). The constituent authorities are East Sussex County Council, West Sussex County Council and Brighton & Hove City Council.

#### How the Combined County Authority will be funded

The constituent councils must meet the costs of expenditure associated with regulation 10 (Part 5 - mayoral functions) of the Statutory Instrument. However, once in place the mayor must agree with the Combined County Authority the total expenditure in advance of incurring the expenditure.

Any precept issued in relation to this expenditure under section 40 of the Local Government Finance Act 1992 is to be disregarded from the cost of expenditure.

The constituent councils contributions must be apportioned either through a mechanism of their own agreement or if no agreement is in place, based on the number of their residents as a proportion of the total population of the CCA area.

Clause 12 of the Statutory Instrument states:

- Para 12(1) Subject to paragraph (3), the constituent councils must ensure that the costs of the Combined County Authority reasonably attributable to the exercise of its functions are met.
- Para 12(2) Subject to paragraph (4), the constituent councils must meet the costs of the expenditure reasonably incurred by the mayor in, or in connection with, the exercise of the functions referred to in regulation 10, to the extent that the mayor has

not decided to meet these costs from other resources available to the Combined County Authority.

- Para 12(3) Any amount payable by each of the constituent councils to ensure that the costs of the Combined County Authority referred to in paragraphs (1) and (2) are met is to be determined by apportioning such costs between the constituent councils in such proportions as they may agree or, in default of such agreement, in accordance with the proportion of the total resident population of the Combined County Authority which resides in the area of each constituent council at the relevant date as estimated by the Statistics Board(a).
- 12(4)(a)(i) The mayor must agree with the Combined County Authority the total expenditure mentioned in paragraph (2) in advance of incurring such expenditure, and (ii) in the absence of such agreement, no such expenditure may be incurred.

The constituent councils acknowledge that this clause permits a locally agreed variation from the default population-based apportionment model.

## **Agreement**

**For the period from the legal establishment of the CCA to 31st May 2028, the constituent councils hereby agree, that:**

- 1) The apportionment of financial contributions and liabilities shall be aligned with the constitutional position of the Combined County Authority.**
- 2) This constitutional position provides for equal voting rights among the constituent councils (of 2 members each).**
- 3) Accordingly, financial contributions and liabilities shall be shared equally among the three councils, reflecting the principle of equal responsibility.**
- 4) The agreed apportionment shall be:**
  - **East Sussex County Council: 1/3**
  - **West Sussex County Council: 1/3**
  - **Brighton & Hove City Council: 1/3**
- 5) The constitution of the Combined County Authority shall reflect this position, requiring the majority agreement of constituent members to agree amendment to this position during the two-year period of this agreement.**

The constituent councils hereby agree in support of 1 to 5 above that:

- i. A clear process will be established for monitoring the financial position of the Combined County Authority by the constituent councils, including regular reporting and forecasting.
- ii. Budget forecasting will be managed proactively, with action taken before any overspend occurs.
- iii. This arrangement will be formally reviewed in May 2028, following Local Government Reorganisation and the election of the Mayor. In the absence of agreement by all

Constituent Authorities at the point of review then the position will revert back to the mechanism stated in the Statutory Instrument in Clause 12(3) i.e. contributions to be determined in accordance with the proportion of the total resident population of the Combined County Authority which resides in the area of each constituent council at the relevant date as estimated by the Statistics Board.

- iv. During this two-year period, any constituent council may call for a review of the funding arrangement if its financial position changes and it is unable to support additional costs.
- v. Any contribution to overspend must not place any constituent council in financial jeopardy.
- vi. Mayoral activities will be funded from the Combined County Authority budget. Election costs will be covered through capacity funding and/or top-slicing of the CCA Investment Fund.
- vii. If full coverage is not possible, election costs will be apportioned by population size among the constituent councils, as a fair mechanism directly linked to the nature of the expense.

Signed:

For **East Sussex County Council**:

Name:

Title:

Date:

For **West Sussex County Council**:

Name:

Title:

Date:

For **Brighton & Hove City Council**:

Name:

Title:

Date:



# Brighton & Hove City Council

## Cabinet

## Agenda Item 106

**Subject:** Council Tax Base and Business Rates Retention Forecasts 2026/27

**Date of meeting:** Thursday, 22 January 2026

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

**Contact Officer:** Name: Haley Woollard, Deputy Chief Finance Officer

**Tel:** 01273 291246

**Email:** [haley.woollard@brighton-hove.gov.uk](mailto: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 council tax base represents the amount that would be raised by setting a £1 council tax on a band D property. It is a requirement of the Local Government Finance Act 1992 and associated regulations that the tax base is calculated for the purpose of setting the council tax in 2026/27 before 31 January 2026.
- 1.2 There is a statutory requirement placed on all business rates collection authorities to calculate how much business rates income each authority is likely to receive for the coming year. Members will be aware there is considerable volatility in business rates income which makes it difficult to forecast, and the council is highly reliant on the data and decisions of the Valuation Office Agency (VOA). In addition, the process for estimating the business rates income for 2026/27 is more complex than previous years. This is as a result of the combination of a new valuation list effective from 1 April 2026, as well as a number of changes to the business rates system, outlined further in paragraphs 3.16 to 3.20.
- 1.3 The purpose of this report is to provide information to enable Members to agree the council tax base for 2026/27 and note the changes to the Business Rates Retention Scheme. The income through the Business Rates Retention Scheme will be included in the General Budget Report to February Cabinet.



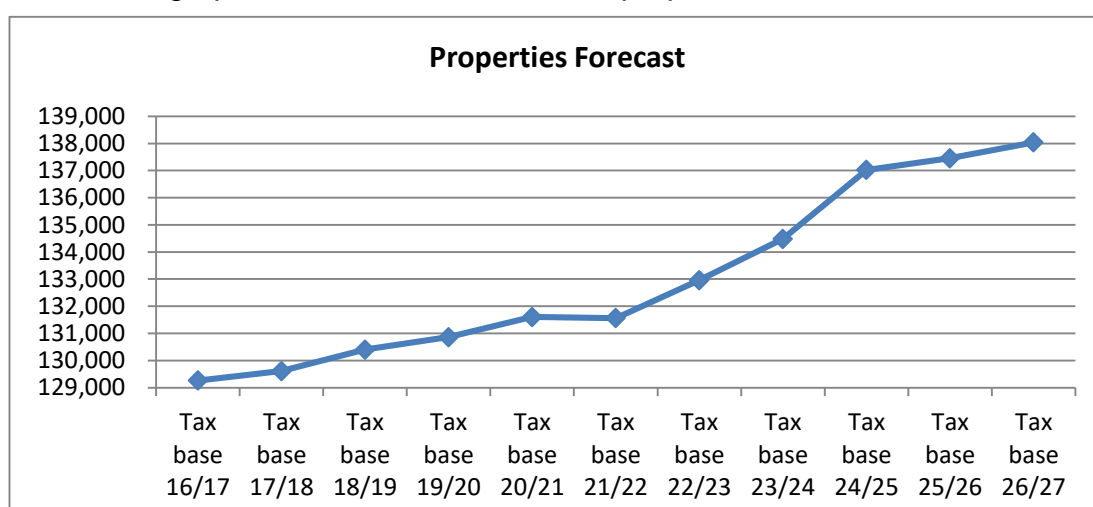
## **2. Recommendations**

- 2.1 That Cabinet agrees the calculation of the council's tax base for the year 2026/27.
- 2.2 That Cabinet notes the collection rate assumed is 98.75%.
- 2.3 That Cabinet notes that no change to the Council Tax Reduction scheme is proposed for 2026/27 except that, in accordance with the policy agreed by full Council on 3 February 2022, earnings bands will be uplifted to reflect government changes to the National Living Wage as set out in paragraph 3.7.
- 2.4 That Cabinet agrees that in accordance with the Local Authorities (Calculation of Tax Base) (England) Regulations 2012, the amounts calculated by Brighton & Hove City Council as its council tax base for the year 2026/27 shall be as follows:-
  - 2.4.1 Brighton and Hove in whole – 96,316.1 (detail in appendix 1).
  - 2.4.2 Royal Crescent Enclosure Committee – 29.7 (detail in appendix 2).
  - 2.4.3 Hanover Crescent Enclosure Committee – 41.1 (detail in appendix 2).
  - 2.4.4 Marine Square Enclosure Committee – 73.7 (detail in appendix 2).
  - 2.4.5 Parish of Rottingdean – 1,775.2 (detail in appendix 2).
- 2.5 That Cabinet agrees that for the purposes of Section 35(1) of the Local Government Finance Act 1992, the expenses of meeting the special levies issued to the council by the Enclosure Committees shall be its special expenses.
- 2.6 That Cabinet agrees that the Enclosure Committees and Rottingdean Parish are paid the required Council Tax Reduction Grant of c£5,000 in total, to ensure they are no better or no worse off because of the introduction of the Council Tax Reduction Scheme for the reasons set out in paragraph 3.15.
- 2.7 That Cabinet notes that the amount forecast to be received by the council in 2026/27 from its share of local Council Tax, including Adult Social Care precepts, is £210.010m based on latest available data.
- 2.8 That Cabinet delegates the agreement of the final business rates forecast and completion of the NNDR1 2026/27 form to the Section 151 Chief Financial Officer following consultation with the Cabinet Member for Finance & City Regeneration and this will be reflected in the General Fund Budget report to Cabinet in February 2026.
- 2.9 That Cabinet notes that the amount forecast to be received by the council in 2026/27 from its share of local business rates and section 31 Local Government Act 2003 compensation grants is £58.442m, based on the provisional local government finance settlement.

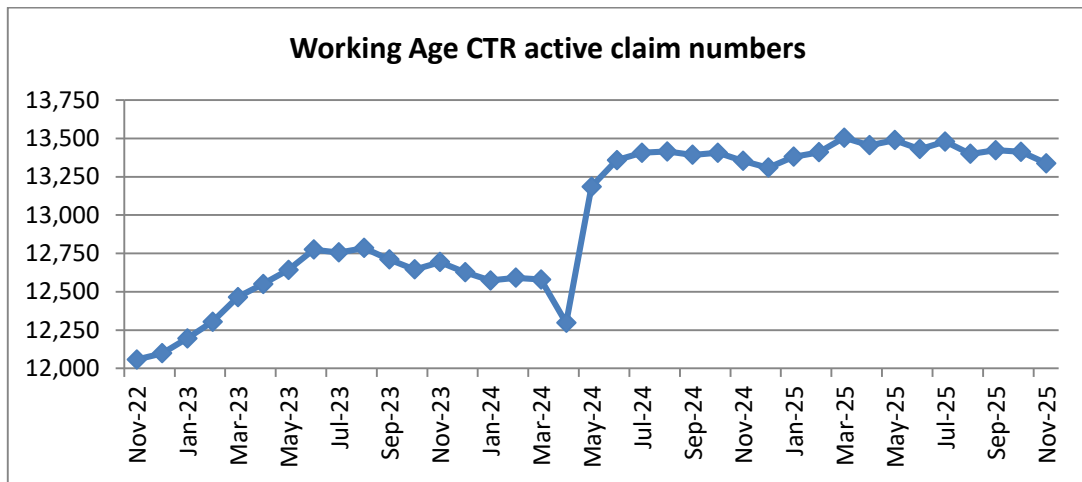
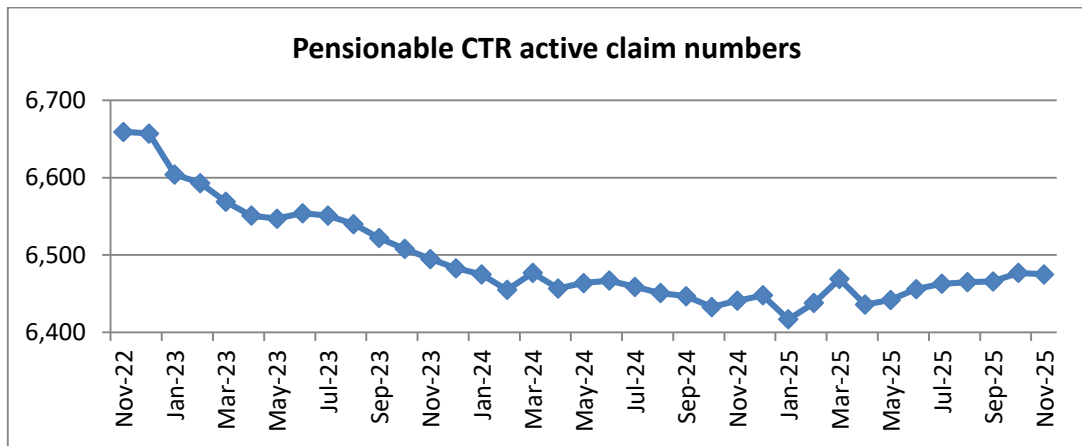
## **3. Context and background information**

### ***Council Tax***

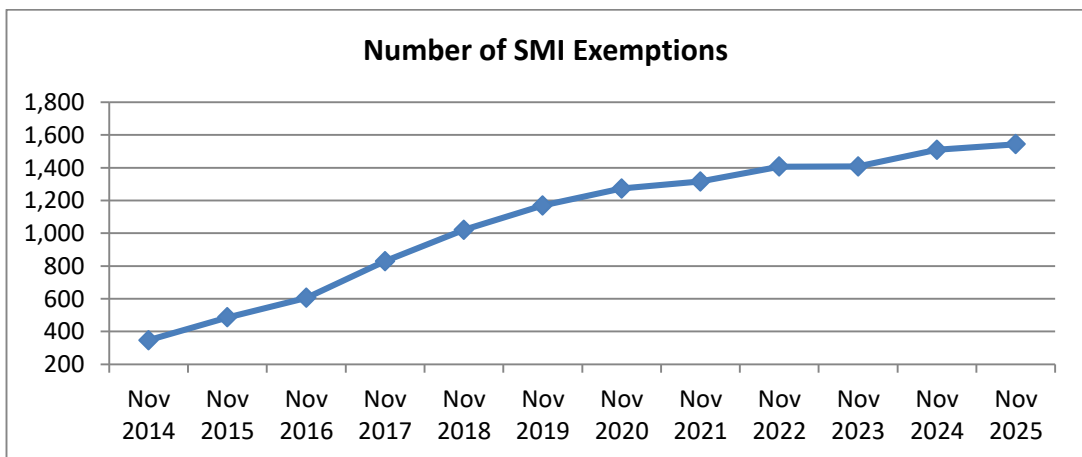
- 3.1 The tax base has been calculated in accordance with the Local Authority (Calculation of Council Tax Base) (England) Regulations 2012. The detail of the calculation for the whole of Brighton and Hove is shown at Appendix 1.
- 3.2 The tax base is calculated by estimating how many properties there will be in each tax band, determining what relevant discounts and exemptions apply, and how much council tax should ultimately be collected based on an expected collection rate.
- 3.3 The key changes to the proposed tax base for 2026/27 are set out below.
- 3.4 As of November 2025, there were 136,509 properties on the valuation list. It is forecast that 1,528 new properties will be added by March 2027 equivalent to a 1.1% increase in the housing stock of the city. The largest developments within this include Moda development (Sackville), Goldstone Apartments, Saunders Park View, The Cliffs in Ovingdean and Davigdor Road. The graph below shows the trend of properties over time.



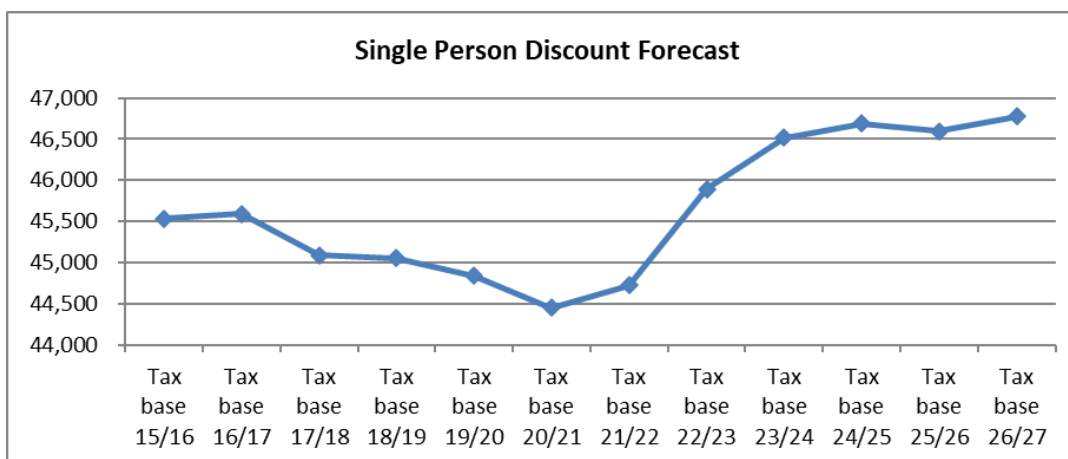
- 3.5 It is estimated that an average of 7,082 properties will be solely occupied by students (including halls of residence) during 2026/27 which is a reduction of 118 on 2025/26. The reduction reflects forecast vacancies in purpose-built student accommodation.
- 3.6 The overall number of working age claimants receiving CTR has gradually reduced from the peak point in March 2025 of 13,505 to 13,337 claimants. The pensionable claimants receiving CTR have slightly increased during 2025/26 and are now at 6,475. The tax base forecast assumes working age and pensionable claimants will remain at current levels and the cost of this support to the council in 2026/27 is estimated to be £21.318m.
- 3.7 The current Council Tax Reduction Scheme (CTR) was approved by full Council in February 2022. No changes were made to the scheme, but the Council approved the uplifting of earnings band thresholds in line with the changes to the National Living Wage announced by government. Similarly, no changes are proposed for the 2026/27 CTR scheme but the earnings bands will be uplifted as per the full Council's earlier decision. Therefore, there is no requirement to consult on the scheme.



- 3.8 The number of exemptions for Severely Mentally Impaired (SMI) eligibility has increased at a much slower pace over the last few years, with a small increase of new awards during 2025/26.



- 3.9 The proposed tax base for 2026/27 estimates the number of single person discounts (SPDs) to be 46,775, based on the 2025/26 forecast plus the proportion of discounts that relates to new properties.



- 3.10 In November 2025 there are 1,000 properties being charged the empty property premium, which has been used in the tax base for 2026/27. The council's share of the empty property premium is forecast to be £2.038m. The table below shows the November 2025 split across the different percentage bands.

Chargeable % for empty property premium	Number
100% on empty for over 1 year, up to 5 years	928
200% on empty for over 5 years, up to 10 years	64
300% on empty for over 10 years	8
<b>Total empty property premiums</b>	<b>1,000</b>

- 3.11 The first year of the 100% second home premium charge has seen the number of properties in receipt of this charge reduce as updated information has been received and any applicable exceptions awarded. However, the Taxbase in 2025/26 was set prudently, with an assumption that only 60% of the properties eligible for the charge would remain eligible due to the expectation of potential behavioural changes and updated circumstances from owners.
- 3.12 The number of properties in receipt of the charge at November 2025 is 1,320. It is assumed that this will reduce further due to the expectation of continued potential changes in circumstances and behavioural changes. The taxbase assumes a reduction to 1,094 properties in receipt of the charge. The council's share of second home premium is anticipated to be £2.251m and is included in this tax base projection.
- 3.13 The resultant tax base proposed for 2026/27 is 96,316.1 which is a 1.2% increase from the 2025/26 tax base of 95,160.3 for the reasons explained above and summarised in the table below.

Element	Tax base
2025/26 tax base	95,160.3
New properties and band changes	668.2
CTR claimants	-63.4
Net change in exemptions	192.0

Net change in discounts	-18.1
Empty Property Premium	138.6
Second Home Premium	238.5
<b>2026/27 tax base</b>	<b>96,316.1</b>

- 3.14 The regulations require a separate calculation for parts of a local authority area where special expenses apply. Appendix 2 show the summary calculation for Enclosure Committees in Brighton and Hove which fall under this category. Each Enclosure Committee sets a levy for maintaining the enclosure gardens, which is recovered through an additional council tax charge to the enclosure residents. Appendix 2 also shows the summary calculation for the Parish of Rottingdean.
- 3.15 The additional discounts generated by the council tax reduction scheme also have implications for the Enclosure Committees and Rottingdean Parish. In line with government guidance and what is considered fair to local residents it is proposed that the relevant proportion of council tax reduction grant is paid to each body to ensure they are no better or no worse off as a result of the local scheme. It is estimated the total grant payable in 2026/27 will be c£5,000 in line with previous years; the actual figure will depend on the tax level set by each body.

### ***Business Rates Retention***

- 3.16 The Business Rates Retention system (BRR) was initially implemented in 2013/14 and was designed to be regularly reset to redistribute growth of business rates income across local authorities. However due to complexity, this hasn't happened. The government has decided a full Business Rates Reset, alongside the Fair Funding Review (FFR). This results in the redistribution of all accumulated growth within the Business Rate system based on the measure of each authority's need. Thereby providing a new Baseline Funding Level (BFL) for business rates for 1 April 2026 with the opportunity to retain growth until the next reset.
- 3.17 The latest working forecast is that the Council's net share of local business rates retained will be £58.442m in line with the council's BFL set in the provisional local government finance settlement.
- 3.18 The BRR is being implemented in 2026/27 alongside a number of other changes to business rates that include:
- From 1 April 2026 a new valuation list reflecting rateable value changes since the last revaluation in 2023.
  - Replacement of Retail, Hospitality and Leisure (RHL) relief with two lower business rates multipliers for RHL properties with rateable values below £500,000.
  - Introduction of new High-value non-domestic rating multiplier for rateable values £500,000 and above.
  - The five multipliers were confirmed in the Autumn Budget as follows:
    - Small business RHL multiplier: 38.2p
    - Small business non-domestic rating multiplier: 43.2p

- Standard RHL multiplier: 43.0p
  - Standard non-domestic rating multiplier: 48.0p
  - High-value non-domestic rating multiplier: 50.8p
  - A redesigned Transitional Relief scheme covering three years to support ratepayers facing large bill increases at the revaluation.
  - Introduction of a Supporting Small Business Scheme (SSB relief) for 2026/27 to provide support for businesses where their Business Rates bill will increase within the new ratings list, and where they will lose some or all of their small business rates relief or rural rate relief.
  - Ratepayers who do not receive Transitional Relief or the Supporting Small Business scheme will be charged a 1p supplement for 2026/27 only.
  - Extending the Small Business Rates Relief (SBRR) grace-period from one to three years, meaning businesses will now remain eligible for SBRR on their first property for three years after expanding into a second property.
- 3.19 This report would ordinarily include an estimate of the retained Business Rates income including the Section 31 grants receivable for the coming financial year to be included in the NNDR1 return. However, the entries for the NNDR1 return for 2026/27 are still being compiled as system updates have been required to reflect the significant changes noted above. In addition, there is added complexity to interpret those within the changed scheme workings for the level of business rates retained. The NNDR1 form will be completed by the statutory deadline of 31 January 2026. This report recommends delegation of the final business rates forecast and the NNDR1 submission to the Chief Finance Officer.
- 3.20 The implications of the business rates forecast and any further technical updates around the BRR scheme will be included in the February budget report to Cabinet.

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

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

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

- 5.1 There are meetings between Finance and Revenues teams to discuss and review collection performance, movements in the tax base and the projections used for determining the tax base for the following year.
- 5.2 The Police & Crime Commissioner for Sussex and the East Sussex Fire Authority have been informed of the latest tax base projections as it forms part of setting their council tax precept.

- 5.3 The council has a duty to consult representatives of business ratepayers on the council's overall budget and this consultation will take place before February Cabinet.

## **6. Financial implications**

- 6.1 The proposed tax base is estimated to generate £210.010m in 2026/27 based on a 4.99% council tax increase (including 2% adult social care precept). This sum will be reflected in the 2026/27 budget proposals to be presented to Cabinet and Budget Council in February 2026. This generates £0.708m additional income compared to the assumptions presented to Cabinet on 11 December 2025.
- 6.2 The assumed level of income through the Business Rates Retention scheme is set in line with the Baseline Funding Level (BFL) set in the provisional Local Government Finance Settlement (LGFS) at £58.442m. This value may change in the Final LGFS, expected in early February. However, the government are providing a 100% Safety Net on BFL, therefore any change will not result in a pressure to the Council. The final figures in the NNDR1 form including the council's share of any business rates collection fund deficit or surplus will be included within the budget forecast for 2026/27 and reported to Cabinet and Budget Council in February 2026.

Finance officer consulted: Haley Woollard Date consulted: 08/01/26

## **7. Legal implications**

- 7.1 Under the Local Government Finance Act 1992, the council must determine the Council Tax base applicable to Brighton & Hove. In respect of 2026/27, the base must be determined before 31 January 2026 as required by regulation 8 of The Local Authorities (Calculation of Council Tax Base) (England) Regulations 2012.
- 7.2 All other references to the legal framework for setting the council tax base are contained within the body of the report.
- 7.3 Under Part 2 of the Non-Domestic Rating (Rates Retention) Regulations 2013 (SI 2013/452), the council must determine specified information relating to its business rates forecast and notify the Secretary of State and relevant precepting authorities of the amounts. In respect of the year commencing 1 April 2026, these amounts must be determined by 31 January 2026.
- 7.4 The calculation of the Council Tax Base and Business Rates Retention Forecasts are not functions reserved to full Council by legislation or by local agreement and, as such, it is a matter to be determined by the Cabinet.

Lawyer consulted: Elizabeth Culbert Date consulted: 12/01/26

## **8. Equalities implications**

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

## **9. Sustainability implications**

- 9.1 None.

## **10. Conclusion**

- 10.1 It is a requirement of the Local Government Finance Act 1992 and associated regulations that the tax base is calculated for the purpose of setting the Council Tax in 2026/27 before 31 January 2026 and this report enables the Council to fulfil that requirement.
- 10.2 The council has a statutory duty to agree a business rates forecast for 2026/27, set out a forecast surplus or deficit for 2025/26 and submit an NNDR1 form by the 31 January 2026.

## **Supporting Documentation**

### **1. Appendices**

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





Area:-

Brighton and Hove (Whole)

Appendix 1

Band: Range (£'k):	A entitled to disabled relief reduction	A <40	B 40-52	C 52-68	D 68-88	E 88-120	F 120-160	G 160-320	H >320	Total
1. Number of dwellings on list	0	30,074	30,592	35,619	20,624	11,710	4,830	2,841	219	136,509
2. Estimate of number of dwellings not listed *	0	210	183	410	318	74	5	7	1	1,208
3. Estimate of number of dwellings listed which will not be in band	0	(23)	(64)	(132)	(121)	(81)	(34)	(29)	(10)	(494)
4. Estimated exempt dwellings	0	(3,740)	(1,485)	(2,949)	(1,076)	(262)	(97)	(60)	(13)	(9,682)
5. Disabled relief dwellings from band above	23	64	132	121	81	34	29	10	0	494
<b>6. Number of chargeable dwellings (sum lines 1 - 5)</b>	<b>23</b>	<b>26,585</b>	<b>29,358</b>	<b>33,069</b>	<b>19,826</b>	<b>11,475</b>	<b>4,733</b>	<b>2,769</b>	<b>197</b>	<b>128,035</b>
7. Single person discounts (25%)	(12)	(15,627)	(12,257)	(9,959)	(5,049)	(2,537)	(912)	(402)	(20)	(46,775)
8. All residents disregarded (50%)	0	(19)	(58)	(61)	(39)	(36)	(34)	(37)	(27)	(311)
9. All but one resident disregarded (25%)	0	(375)	(494)	(482)	(261)	(116)	(35)	(13)	(1)	(1,777)
10. Second Home Job Related (ZERO) (50%)	0	(2)	(2)	0	(3)	(1)	(1)	0	0	(9)
11a. NEW 1 YEAR EMPTY PP 100%	0	239	191	178	103	51	23	21	1	807
11b. Empty Property Premium 100%	0	31	29	22	15	19	1	3	1	121
12. Empty Property Premium 200%	0	25	20	12	4	0	0	2	1	64
13. Empty Property Premium 300%	0	2	3	3	0	0	0	0	0	8
14. Second Home Premium 100%	0	206	241	214	196	148	45	37	7	1,094
15. Council Tax Reduction (CTR)	0	(4,870)	(3,771)	(2,727)	(765)	(238)	(57)	(20)	(1)	(12,449)
16. Total number of appropriate percentage discounts	(3.00)	(8,349.00)	(6,478.75)	(4,920.75)	(1,791.50)	(701.75)	(242.25)	(77.25)	(8.75)	(22,573.00)
<b>17. Aggregate of Lines 6+16</b>	<b>20.00</b>	<b>18,236.00</b>	<b>22,879.25</b>	<b>28,148.25</b>	<b>18,034.50</b>	<b>10,773.25</b>	<b>4,490.75</b>	<b>2,691.75</b>	<b>188.25</b>	<b>105,462.00</b>
18. Ratio to Band D	0.5556	0.6667	0.7778	0.8889	1.0000	1.2222	1.4444	1.6667	2.0000	
<b>19. Relevant Amount (Line 17 x Line 18)</b>	<b>11.10</b>	<b>12,157.30</b>	<b>17,795.00</b>	<b>25,020.70</b>	<b>18,034.50</b>	<b>13,167.30</b>	<b>6,486.60</b>	<b>4,486.30</b>	<b>376.50</b>	
May contain minor rounding adjustments							Aggregate of Relevant Amounts		97,535.30	
							Collection Rate		98.75%	
							Adjustment (contributions in lieu)		0.00	
* This reflects the part year effect of 643 dwellings to be added during 2026/27							<b>ESTIMATED TAXBASE 2026/27</b>		<b>96,316.10</b>	



## Tax base calculation for enclosure committees and the parish of Rottingdean

	Royal Crescent	Hanover Crescent	Marine Square	Rottingdean Parish
Number of dwellings on list	25	45	119	1,797
Number of chargeable dwellings	24	44	116	1,759
Total number of appropriate percentage discounts	(1.75)	(5.25)	(23.00)	(189.25)
Aggregate of chargeable dwellings and discounts	22.25	38.75	93.00	1,569.75
Aggregate of Relevant Amounts (Band D equivalent)	30.0	41.5	74.4	1,797.7
Collection Rate	99.00%	99.00%	99.00%	98.75%
<b>TAXBASE</b>	<b>29.7</b>	<b>41.1</b>	<b>73.7</b>	<b>1,775.2</b>



# Brighton & Hove City Council

## Cabinet

## Agenda Item 107

**Subject:** Circular Economy Routemap and Action Plan 2025-2035

**Date of meeting:** 22 January 2026

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

**Lead Officer:** Head of Cabinet Office

**Contact Officer:** Sophie Moss  
Sophie.moss@brighton-hove.gov.uk

**Ward(s) affected:** All

**For general release**

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

- 1.1 The purpose of this report is to seek approval for the 2nd iteration of the Circular Economy Routemap and Action Plan 2025–2035 (as detailed in Appendix 1). The Routemap sets out the strategic framework for embedding circular economy principles and practices across the city, supporting delivery of the Brighton & Hove City Council Plan 2023–2027 (a city to be proud of, a fair and inclusive city and a healthy city that helps people thrive) and the commitment to achieve net zero carbon (see Appendix 2).
- 1.2 It responds to local economic challenges by promoting resource efficiency, waste reduction and green business growth, while also aligning with national policy developments, including the forthcoming Circular Economy Strategy for England and wider government commitments to a green industrial transition.
- 1.3 Adoption of the Routemap will provide a clear policy direction for the Council and its partners, helping to ensure coordinated action to build a fairer, more resilient and sustainable local economy in line with the ambitions set out in the city's Economic Plan. It also builds upon the progress with the city's circular economy programme to date.

### **2. Recommendations**

- 2.1 That Cabinet approves the Circular Economy Routemap and Action Plan 2025-2035 as the strategic framework for embedding circular economy principles across the city and to inform council activity.
- 2.2 That Cabinet agrees to Brighton & Hove signing the Circular Cities Declaration to reinforce the city's role as a national and regional leader in circular innovation.

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

- 3.1 There are wider economic, social and environmental challenges that can constrain the potential for Brighton & Hove to achieve its growth potential. These include the cost-of-living crisis, a shortage of affordable and fit-for-purpose commercial and industrial space, persistent inequalities across the city, and the urgent need to cut carbon emissions. Together these issues are impacting productivity, investment and competitiveness.
- 3.2 The Circular Economy Routemap and Action Plan 2025–2035 provides a strategic framework to address these challenges by embedding circular principles across council operations, local business ecosystems, and community initiatives. Building on the progress achieved since the adoption of the original Routemap in 2020, this refreshed plan sets out a coordinated policy response aligned with key Council Plan outcomes and national policy developments on net zero, resource efficiency, and sustainable growth.

#### Council Plan Alignment

- 3.3 The Circular Economy Routemap strongly aligns with the Council Plan, directly supporting delivery across all four strategic outcomes, including:
  - **A city to be proud of:** the Routemap helps to advance the council's net zero ambitions, improving waste management, enhancing the natural environment and positions Brighton & Hove as a leader in the circular economy.
  - **A fair and inclusive city:** identifies initiatives that reduce inequality, foster community-led circular projects and supports efforts to build cost-of-living resilience.
  - **A healthy city that helps people to thrive:** the Routemap will help to create new green jobs, strengthen education and skills development and supports work to improve health and wellbeing through developing a greener, more sustainable economy.
  - **A learning council with well-run services:** helps to drive innovation, strengthen cross-council working and partnerships and supports responsible resource management.
- 3.4 The work also closely aligns with the Brighton & Hove Economic Plan 2024-2027 and its mission to decarbonise and create a more regenerative economy. It will help to address key economic challenges such as affordability, commercial space constraints, and low business scale-up rates. It outlines how circular economy approaches—such as reuse, repair, remanufacturing, and regenerative design—can unlock new revenue streams and opportunities for local businesses, reduce environmental impact, and build long-term economic resilience through future-proofing operations.

#### Strategic Role of the Programme

- 3.5 The Circular Economy Programme provides an overarching framework to monitor and accelerate the growth of circular activity across Brighton & Hove. While the Routemap sets out a visionary direction, the accompanying Action Plan delivers practical steps to raise the profile of circularity and embed it into everyday practice. By working collaboratively with stakeholders across sectors, the programme positions Brighton & Hove as a regional leader in circular innovation—acting as a catalyst for economic growth and resilience. As the circular economy expands, its influence will extend across

the region, enabling new start-ups, fostering industrial symbiosis, and creating conditions for sustainable investment. This approach aligns with the ambitions of the emerging Mayoral Combined Authority, ensuring that circularity becomes a driver of inclusive growth and competitiveness.

#### Benefits of the Programme for the City

##### 3.6 The benefits include:

- **Economic Growth and Investment:** Establishes Brighton & Hove as a safe and attractive destination for future investment in green innovation.
- **Job Creation and Skills Development:** Supports the creation of high-quality green jobs and upskilling opportunities, helping to diversify the local workforce and strengthen resilience.
- **Affordability and Cost-of-Living Resilience:** Circular practices such as reuse, repair, and sharing schemes reduce household costs and improve access to affordable goods and services.
- **Regional Leadership:** Positions the city as a hub for circular innovation, influencing policy and attracting funding through strong governance and partnerships.

#### The Approach

##### 3.7 The Routemap sets out four key strategic objectives that build on progress to date and has been developed collaboratively with stakeholders across priority sectors:

- **Maximise council influence to drive circular demand:** for example, exploring the potential to embed circular procurement requirements in all major Council contracts—such as reuse targets, repair obligations, and low-waste construction standards—to stimulate market demand for circular goods and services.
- **Build strategic partnerships for greater impact:** for example, seeking to establish a cross-sector Circular Innovation Partnership with universities, anchor institutions, and local businesses to pilot circular solutions in food, textiles, and construction.
- **Create the right conditions for circular business growth:** exploring the potential to develop a Circular Business Support Programme offering specialist advice for startups and SMEs adopting reuse, remanufacture, and materials-efficiency models.
- **Influence regional and national policy to unlock circular opportunities:** work with regional authorities including a future Sussex and Brighton Mayor and national networks to advocate for policy changes—such as fiscal incentives for reuse, consistent recycling standards, and funding for circular infrastructure—to enable city-wide scale-up.

##### 3.8 The Routemap prioritises key sectors with the greatest potential for circular transformation—construction and the built environment, the visitor and creative industries, food systems, and digital innovation—supporting new models of production, consumption, reuse, remanufacturing and repair. It is supported by a robust monitoring framework that applies clear milestones and measurable indicators—such as tracking the number of circular businesses supported into new markets—while using light-touch, low-



resource methods like annual partner reporting and short automated surveys to ensure progress remains transparent and accountability is maintained across all actions. By fostering collaboration between businesses, research institutions, and communities, the Action Plan seeks to enhance productivity, retain value within the local economy, and position Brighton & Hove city as a leader in a future regional hub for circular innovation and sustainable prosperity.

#### Circular Innovation and Collaboration

- 3.9 The council's leadership role is reinforced through active participation in national and regional networks, including DEFRA's Circular Economy Pathfinders and Taskforce, the Ellen MacArthur Foundation's Circular Cities Stand-Up, and collaboration with ReLondon and other pioneering local authorities. These partnerships enable Brighton & Hove to share best practice, access technical expertise, and align with cutting-edge national policy developments in resource efficiency, reuse, and waste reduction.
- 3.10 Continued engagement in these networks strengthens the city's capacity to pilot innovative circular projects, attract investment, and influence national direction on circular policy and funding. This collaborative approach ensures that Brighton & Hove remains at the forefront of the circular transition, benefitting from shared knowledge, data insights, and opportunities to scale innovation across the wider region – particularly with devolution on the horizon. Through this approach, the city aims to strengthen local economic resilience by creating high-quality green jobs, stimulating innovation in circular business models, and reducing reliance on finite resources.
- 3.11 Over the past six years, Brighton & Hove has secured significant national and European funding to accelerate its circular economy transition. This includes the [EU Interreg Blueprint project](#) (£450k, 2020–2023), which supported scalable pilots in communities, materials recovery, and sustainable procurement, and the National Lottery Climate Action Fund – [Climate for Communities](#) (£1.3m, 2025–2028), which is empowering neighbourhood initiatives such as repair cafés, reuse hubs, and sharing schemes. These programmes have strengthened partnerships with universities and local enterprises, delivered measurable reductions in waste and carbon, supported local jobs, and laid the foundations for major initiatives such as the regional Horizon-funded South East of England Hub for Circularity – helping to position Brighton & Hove as a leader in circular innovation.

#### Skills, Workforce and Economic Growth

- 3.12 The Circular Economy Programme is not only an environmental initiative—it is a driver of inclusive economic growth. By fostering new business models such as reuse, repair, and remanufacturing, the programme creates opportunities for green jobs and entrepreneurship. Working with universities, training providers, and industry partners, the Action Plan will deliver targeted upskilling programmes to equip residents with the skills needed for emerging circular roles. This approach supports workforce diversification by opening pathways for underrepresented groups and ensuring that local talent benefits from the transition to a low-carbon economy. In doing so, the programme strengthens Brighton & Hove's position as a regional hub for

innovation and investment, aligning with the ambitions of the Mayoral Combined Authority for sustainable growth.

### Communications

- 3.13 A communications and media plan will be developed to:
- Build citywide understanding of what the Circular Economy is and means for Brighton & Hove, moving it from an abstract concept to a relatable programme
  - Introduce more residents and businesses to a circular economy way of thinking and working and support behaviour change
  - Demonstrate circular economy principles in action within the council and with partners in the city
  - Position Brighton & Hove as a national leader in circular economy practices.
- 3.14 Communications will be delivered by the central communications team, linking in across services and with the Council Plan delivery.

### Circular Cities Declaration

- 3.15 The Circular Cities Declaration (CCD) is a high-profile European initiative bringing together over 80 cities committed to transitioning from a linear to a circular economy. There are currently only 3 [signatories](#) in the UK (Glasgow, London Borough of Newham and Wolverhampton).
- 3.16 By joining, Brighton & Hove will gain access to a collaborative network of pioneering cities, expert-led learning opportunities, and preferential access to funding and innovation programmes. It would also enhance the city's international visibility, enabling the Council to showcase its circular achievements and influence policy development at regional and national levels. The declaration supports light-touch reporting and provides a shared framework for monitoring progress, fostering accountability, and continuous improvement.
- 3.17 Signing the CCD presents a strategic opportunity for the council to reinforce its leadership in sustainability and accelerate delivery of the Circular Economy Routemap and the council's Carbon Neutral 2030 commitments. The CCD brief is provided as Appendix 3 to this report.

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

### Option 1: Stop the circular economy programme

- 4.1 Ceasing the circular economy programme would have a number of potential implications:
- Loss of strategic direction: Without a coordinated programme, the city would lack a clear framework to guide circular economy initiatives, resulting in fragmented efforts and missed opportunities for systemic change.
  - Reduced national leadership: Brighton & Hove has been recognised as a circular economy pathfinder by DEFRA. Ending the programme would undermine this leadership and diminish the city's influence in shaping national policy.

- Missed funding and investment: The programme has unlocked past external funding opportunities. Discontinuation would risk losing future investment and partnership opportunities.
- Negative environmental impact: The programme supports the city's Net Zero and Climate Action Plans. Halting it would slow progress in reducing Scope 3 emissions and waste and weaken resilience to climate impacts.
- Economic and social costs: Circular initiatives support local businesses, reduce cost-of-living pressures, and create green jobs. Ending the programme would limit these benefits.

4.2 As such, this option is not recommended due to its significant negative impact on environmental, economic and social outcomes.

#### Option 2: Reliance on service-level actions without an overarching framework

4.3 Not adopting the Circular Economy Routemap would mean that activity may continue, but the lack of an overarching framework would bring a number of potential implications:

- Lack of coherence and coordination: Service-level actions may be well-intentioned, but risk duplication, inefficiency, and inconsistent outcomes without a shared strategic framework. This has the potential to increase costs to the council.
- Limited scalability and innovation: The absence of a citywide Routemap would hinder cross-sector collaboration and innovation, reducing the potential to scale successful pilots and attract external funding.
- Weakened monitoring and accountability: Without a unified action plan, it becomes difficult to track progress, measure impact, and report outcomes to stakeholders and funders.
- Reduced visibility and engagement: A fragmented approach would dilute the city's messaging, which is likely to reduce public and business engagement with circular economy principles.

4.4 Accordingly, whilst service-level actions are important, it is strongly recommended that they are guided by the strategic framework set out in this report to maximise impact and ensure alignment with citywide goals.

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

5.1 The Routemap has been informed by wide-ranging engagement with local stakeholders, including businesses, community organisations, academic institutions and national circular economy policy organisations (including DEFRA, the Ellen MacArthur Foundation and ReLondon).

5.2 Targeted workshops and sector-specific consultations have shaped the priorities and actions set out in the plan. Ongoing engagement will be undertaken during delivery through established networks, forums and community initiatives to ensure that a wide range of voices continue to inform and support implementation.

- 5.3 A collaborative approach is crucial in driving the sustained impact and innovation that the Routemap seeks to support.

## **6. Financial implications**

- 6.1 There are no financial implications arising from this report. Activities relating to the Circular Economy programme will be covered by existing budget resources. The majority of actions within the Circular Economy Routemap and Action Plan will be delivered by external partners, supported by existing networks and funded programmes. Council involvement will primarily focus on coordination, monitoring, and enabling activity, which can be managed within current resources. Some officer time will be required for governance, stakeholder engagement, and communications, but this is expected to be absorbed through existing roles. Where specialist input or additional capacity is needed, opportunities for external funding and collaboration will be actively pursued to minimise any direct financial impact on the council.

Name of finance officer consulted: Ishemupenyu Chagonda Date consulted (11/12/25):

## **7. Legal implications**

- 7.1 There are no direct legal implications arising from the recommendations in this report. When seeking to implement the circular economy principles proposed by this report, the legal implications arising from such proposals will need to be considered as part of decision-making on future projects.

Name of lawyer consulted: Siobhan Fry Date consulted (19/12/25)

## **8. Risk implications**

- 8.1 Failure to adopt the refreshed Circular Economy Routemap and Action Plan may result in missed opportunities to address local economic, social and environmental challenges, including the potential to weaken the council's ability to meet its Net Zero targets.
- 8.2 There is also a risk that without a clear framework, local businesses and partners may face uncertainty when adapting to emerging national policy and regulatory requirements.
- 8.3 Delivery risks include limited availability of funding, capacity constraints and an over-reliance on external partners.
- 8.4 These risks can be mitigated through the strong governance provided by the circular economy programme, a collaborative approach and alignment to the emerging national circular economy strategy.

## **9. Equalities implications**

- 9.1 The circular economy programme supports inclusive economic growth through helping to create accessible training, employment and community opportunities. The Action Plan helps to address social inequalities by

supporting community-led initiatives (such as the Circular Communities project), working collaboratively to create opportunities for green skills and jobs, as well as reducing cost-of-living pressures through reuse, repair and sharing schemes.

## **10. Sustainability implications**

- 10.1 It is anticipated that implementation of the Circular Economy Routemap and Action Plan 2025–2035 will make a significant contribution to achieving the Council's Carbon Neutral 2030 target and wider sustainability objectives. By embedding circular principles such as resource efficiency, reuse, repair, remanufacturing, and regenerative design across council operations, local business ecosystems, and community initiatives, the Routemap promotes a shift from a linear 'take-make-dispose' model towards one that keeps materials and products in use for longer. This approach is expected to reduce greenhouse gas emissions, minimise waste generation, and optimise the use of natural resources.
- 10.2 In addition, the Routemap will enhance the city's climate resilience and environmental quality by supporting sustainable construction practices, encouraging low-carbon consumption patterns, and enabling community-led circular initiatives that build local capacity and neighbourhood resilience. The actions set out in the Routemap will also deliver co-benefits for health, wellbeing, and inclusive economic growth by helping to create green jobs and strengthening local supply chains. Collectively, these outcomes will support Brighton & Hove's transition to a more sustainable, low-carbon, and resource-efficient economy.

## **11. Other Implications**

### **Crime & disorder implications:**

- 11.1 There are no direct crime and disorder implications arising from this report. However, the Circular Economy Routemap supports wider social benefits, including community cohesion, access to affordable goods and services, and opportunities for training and employment. These outcomes may contribute indirectly to reducing social inequalities that can be associated with crime and disorder.

## **12. Conclusion**

- 12.1 The Circular Economy Routemap and Action Plan 2025–2035 provides a clear strategic and coordinated framework for embedding and delivering circular principles across Brighton & Hove. It supports delivery of the Council Plan 2023–2027, contributes to the city's net zero target, and responds to local economic and environmental challenges.
- 12.2 Adoption of the Routemap will strengthen the city's resilience, unlock external funding and investment, foster inclusive economic growth, and ensure alignment with emerging national policy. It is recommended that Cabinet approves the refreshed Circular Economy Routemap and Action Plan 2025-2035 as the strategic framework for embedding circular economy

principles and practices across the city, and endorses its adoption to inform council policy, procurement, service design, and partnership activity, thereby enabling the continued delivery and progression of the Circular Economy Programme.

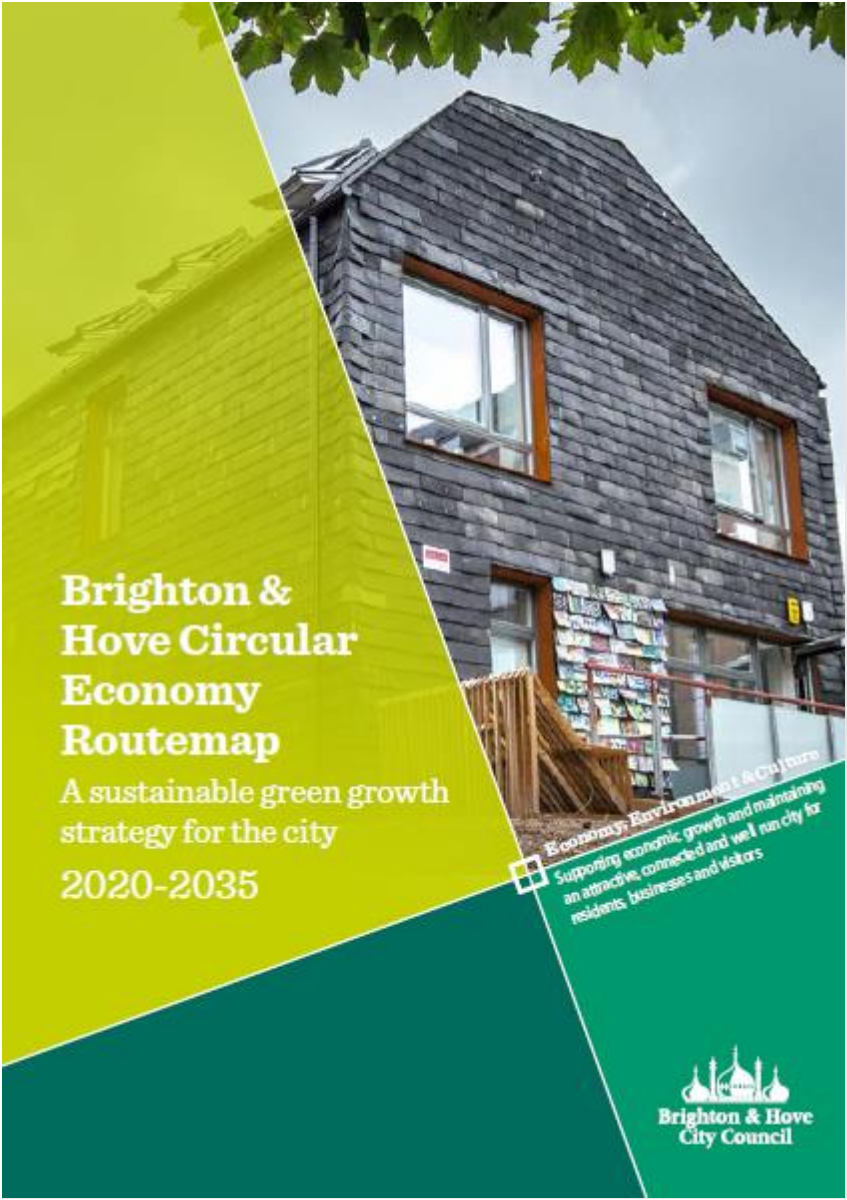
- 12.3 It is also recommended that Cabinet agrees to sign the Circular Cities Declaration, helping to cement Brighton & Hove's position as a leader in circular innovation in the UK.

### **Supporting Documentation**

#### **1. Appendices**

1. Circular Economy Routemap and Action Plan 2025-2035
2. Council Plan Alignment
3. Circular Cities Declaration Brief





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## Foreword – to be signed off

Brighton & Hove is known for its brilliant creativity and the city's entrepreneurial spirit is at the heart of our new Circular Economy Routemap and Action Plan.

We're proud to be at the forefront of developing a circular economy strategy locally and nationally, thanks to the talent, knowledge and forward-thinking in our universities, businesses, communities and public organisations working together for a more sustainable future.

Brighton & Hove is a leader in this field and was part of the government's Taskforce and Pathfinder programme to develop England's first national Circular Economy Strategy – The Circular Economy Growth Plan.

From designing out waste from products and materials, keeping them in use for longer, to strengthening local supply chains and finding ways to regenerate natural resources, our circular economy plan recognises the city's massive potential.

We've set out a vision that will provide economic opportunities, promote business innovation and develop new skills and jobs, building wealth within our communities. This plan will enable us to engage with our fast-growing digital and tech sector and strengthen knowledge and innovation partnerships working with the city's two universities.

Connecting local and national priorities not only reinforces our commitment to a sustainable future but also sets out a blueprint for other councils to follow.

Our Circular Economy Action Plan complements our Council Plan's commitment for building a fairer, healthier, and more sustainable city for all our residents, to grow a diverse and sustainable economy and work towards net zero.

The necessity for sustainable development and economic resilience has never been more pressing. We have completed the groundwork that will help us take advantage of emerging opportunities to develop a strong, resilient economy with tangible benefits for residents.

I am immensely proud of the collaborative efforts that have gone into shaping this plan. It reflects the dedication and innovation of our communities, universities, businesses, and public sector partners. Together, we are making strides towards a circular economy that works for everyone.

Our plan will support inclusive and sustainable growth and help us move forward with determination and unity, embracing the opportunities ahead. We invite you to develop your own actions to help achieve a circular economy in Brighton & Hove.

Councillor Bella Sankey, Leader of Brighton & Hove City Council

## Vision

Brighton & Hove city will continue to maintain a national leadership role in the development of a circular economy as a core component of inclusive and sustainable economic growth. By designing systems that retain material in use, reduce waste and regenerate natural resources, this approach supports long-term competitiveness, drives innovation, attracts investment and delivers high-quality local jobs.

A circular economy will strengthen our city's economic resilience by reducing dependence on volatile global supply chains and will foster innovation across industries. It will keep wealth circulating in the local economy by reducing dependency on overseas manufacturing as we shift to local remanufacturing, repair, upcycling and designing out waste.

By designing waste out of our systems, rethinking product lifecycles, and prioritising resource efficiency, we will unlock new markets and revenue streams for businesses.

Our vision is a city where businesses, communities, and residents embrace circularity as a core part of daily life, recognising the positive impact a circular model creates. By making this fundamental to the way we do business, we will tackle the

climate and biodiversity crisis, strengthen our economy, and improve social well-being.

Innovation will be central to this transition - not only as a means of adopting new technologies and practices, but as the driver of entirely new solutions, business models, and ways of living. By embedding innovation into the heart of our circular economy approach, Brighton & Hove can deliver measurable environmental and social impact while also generating sustainable economic growth, high-value jobs, and investment opportunities. In doing so, the city will position itself as a national leader in translating circular ambitions into real-world outcomes

Becoming a more circular city will also make a significant contribution towards the local delivery of the United Nations Sustainable Development Goals (SDGs):

Design to put in an info graphic from [THE 17 GOALS | Sustainable Development](#)

Brighton & Hove is uniquely positioned to lead this change. Through bold action, collaboration, and investment, we will build a circular city that is prosperous, sustainable, and inclusive, setting a national benchmark for what's possible. Our city's future is one where economic success and environmental responsibility go hand in hand—creating a model that others will follow.

## The city's economic challenges

The Brighton & Hove Economic Plan 2024-2027 outlines the economic challenges facing the city, and whilst it is a 3-year plan, it commences a 10-year strategic journey to become a more competitive, productive, fairer and greener city. Some of the main challenges facing the city are:

**Economic competitiveness:** There is a notable scarcity of businesses scaling up compared to other UK cities.

**Commercial space constraints:** Recent years have seen a decline in retail, office, and industrial floorspace, with much of the existing stock being of poorer quality and low energy efficiency.

**Affordability and cost of living:** The rising cost of living, coupled with declining real-term wages, exacerbates financial pressures on residents.

**Social inequality:** Disproportionately low average earnings mean communities often face additional challenges, including limited access to essential services and substandard housing, leading to increased risks of fuel poverty and food insecurity.

**Environmental sustainability:** there is a pressing need to support businesses in

reducing emissions and waste. Additionally, much of the existing commercial infrastructure requires upgrades to meet future sustainability standards.

## How the circular economy can address these challenges

Circular economy plays a vital role in underpinning a more sustainable economy and can transform these challenges into opportunities, fostering a more resilient and equitable urban environment through:

### **Enhancing economic competitiveness:**

Circular business models such as redesigning, repairing, sharing, remanufacturing, recycling, and recovering not only reduce environmental impact but also unlock significant economic benefits. By adopting these practices, businesses can lower production and energy, reduce reliance on volatile raw material markets, and cut waste disposal fees. In doing so, they drive innovation, enhance their competitiveness and build greater economic resilience — particularly as consumer and investor demand for sustainability increases. Unlike linear models, which leave local economies exposed to external shocks, circular approaches help create a more resilient and robust economic system with ‘spin out’ social, educational and well-being benefits. The ability to differentiate through

circular innovation is becoming a clear market advantage.

**Optimising commercial spaces:** Circular economy approaches encourage the adaptive reuse and repurposing of existing buildings, transforming underutilised properties into vibrant, fit-for-purpose commercial spaces. This helps address the shortage of affordable, quality workspace, particularly for SMEs and start-ups, and reduces the need for resource-intensive new builds. Supporting these efforts can also stimulate local construction and refurbishment industries, creating opportunities for upskilling and green jobs.

**Improving affordability:** Circular economy can address affordability and cost of living by reducing dependencies on resource intensive, linear consumption patterns and creating local, low-cost alternatives supported by community-based circular initiatives. Tool libraries, repair cafés, and sharing schemes help households lower their day-to-day expenses while promoting a culture of resourcefulness and mutual support. Circular strategies in construction — such as lean and modular design and reuse of building materials — can significantly reduce both construction and maintenance costs, making homes more affordable over the long term, especially as the cost of materials continues to rise.

**Reducing social inequality:** Implementing circular economy projects in underserved areas can open up new training, employment, and entrepreneurship opportunities. For example, upcycling workshops, localised remanufacturing, and repair-based enterprises offer accessible entry points into the green economy. These initiatives not only provide income and skills but also foster stronger, more resilient and cohesive communities by improving access to goods and services through low-cost, circular alternatives.

**Advancing environmental sustainability:** The circular economy directly contributes to environmental goals by keeping materials in use and circulation, thus reducing the need for virgin resource extraction—the source of half of global greenhouse gas emissions and over 90% of biodiversity loss and water stress (Global Resources Outlook, 2019). Practices such as urban mining, decentralised recycling, and regenerative local food and materials systems all reduce environmental impact while creating new business opportunities. As commodity prices rise and regulatory pressure increases, circular solutions become not only environmentally necessary but economically advantageous.

## Circular economy and net zero

The council is working closely with the city's fast-growing digital and tech sector, strengthening knowledge and innovation partnerships with both universities, and embedding circular economy principles to build a regenerative economy that supports our transition to net zero.

We are also collaborating with education providers and employers to develop a stronger, more inclusive labour market, ensuring that local people are equipped with the skills needed for a green economy.

The urgency of this transition is clear. The economic impacts of climate change are already being felt. Between 2022 and 2024, rising global temperatures contributed to 60% of the increase in UK food bills, costing households an average of £361 (ECIU, 2024). In addition, rising energy prices—driven by reliance on fossil fuels—added a further £244 to household costs.

These impacts stem from our transport and energy systems, and significantly, from the production, consumption, and disposal of goods and materials. The circular economy

provides a powerful framework to address the latter.

A key focus is on Scope 3 emissions—those embedded in products and materials. In

### Scope 1, 2 and 3 emissions

Carbon emissions are categorised into three scopes based on the source and control of the emissions. These categories are defined by the Greenhouse Gas Protocol for cities, a widely recognized framework for accounting and reporting greenhouse gas (GHG) emissions. These are:

**Scope 1** – GHG emissions from sources located within the city boundary (e.g. CO<sub>2</sub> emitted during the combustion of gas in boilers or the combustion of petrol or diesel in vehicles)

**Scope 2** – GHG emissions occurring as a consequence of the use of grid-supplied electricity, heat, steam and/or cooling within the city boundary (e.g. carbon dioxide emitted from electricity power plants or from waste to energy plants that power some cities' district heating networks)

**Scope 3** – All other greenhouse gases emitted outside the city boundary as a result of activities taking place within the city boundary, e.g. greenhouse gases emitted during the growing, rearing and processing of food and manufacturing and transportation of products and materials consumed within the city.

London, Scope 3 emissions are estimated to be three times higher than direct emissions. This is likely true for Brighton & Hove, where industrial activity is limited and car ownership relatively low. Tackling these emissions is essential to achieving our climate goals.

## The role of partners

The transition to a circular economy requires participation from the public sector, businesses, academia, residents and communities.

The public sector can drive the transition to a circular economy by setting clear policy direction, creating supportive regulation, and using its assets, procurement power and infrastructure to enable circular practices. Councils and public bodies can act as convenors, bringing together businesses, academia and communities to collaborate on solutions, while also acting as testbeds for innovation by opening up buildings, land and services for pilot projects. By embedding circular principles into planning, waste management, procurement and service design, the public sector can create the conditions that help residents and businesses reduce waste, extend the life of materials and accelerate the shift to a more regenerative local economy.

The business sector can accelerate the transition to a circular economy by redesigning products and services to minimise waste, extend product life, and keep materials in use for longer through reuse, repair, remanufacturing and sharing models. Companies can adopt circular operating practices — such as using recycled materials, reducing packaging, and offering take-back or leasing schemes — and collaborate with local networks, innovation hubs and other businesses to develop new solutions. By embedding circularity into their strategy, supply chains and customer offerings, businesses can reduce costs, create new revenue streams, and contribute to a more resilient, low-carbon local economy.

Academia can play a vital role in the transition to a circular economy by generating new research, technologies and design approaches that support circular innovation. Universities can act as testbeds for real-world experimentation, working with businesses, councils and communities to trial solutions, evaluate impacts and translate ideas into practical applications. By embedding circular economy principles into teaching and skills development, academia helps prepare the future workforce, while innovation hubs and collaborative research programmes connect

academic expertise with industry needs — accelerating the adoption and scaling of circular practices across the city.

Residents and communities can support the transition to a circular economy by making everyday choices that reduce waste and keep materials in use for longer — such as repairing items, choosing preloved, sharing tools and appliances, and reducing unnecessary consumption. Community groups, repair cafés, sharing libraries and local food initiatives create spaces where people can learn new skills, access affordable reused goods and connect with others taking practical action. By supporting local circular businesses, participating in recycling and reuse schemes, and encouraging neighbours to get involved, residents and communities help build a culture of circular living that strengthens the local economy and reduces environmental impact.

Together, these partners create the conditions for Brighton & Hove to shift towards a resilient, low-carbon and circular economy — supported by upstream innovation, midstream collaboration, and downstream community action.

## Our circular economy objectives

The Circular Economy Routemap sets out to drive circular innovation, foster economic growth, enhance resource security and support the city's journey to net zero.

Through co-delivery of actions in the refreshed Circular Economy Action Plan (2025-2035) in Appendix 1, the council will:

1. Maximise council influence to drive circular demand
2. Build strategic partnerships for greater impact
3. Create the right conditions for circular business growth
4. Influence regional and national policy to unlock circular economy opportunities

### 1. Maximising council influence to drive circular demand

We will leverage the council's operations, procurement policies, and regulatory powers to stimulate local demand for circular products and services.

#### Our approach will involve:

- Embedding circular economy requirements in public sector procurement.

- Commissioning a study to consider planning policy options to support net zero and circular economy to inform the new City Plan 2041 including potential requirements for embodied carbon.
- Embedding circular construction principles and piloting innovations (in planning, design, sustainable materials and methods of construction) in council-led developments and highways projects.
- Delivering food waste prevention actions included in the city-wide Food Strategy (2025–2030)
- Protecting the city’s main water source, the chalk aquifer, by supporting the adoption of regenerative farming practices and through the delivery of a sustainable drainage implementation plan

## 2. Building strategic partnerships for greater impact

Utilising the council’s convening power to forge collaborations across public, private, academia and third sectors, will help to unlock external funding and investment, scale circular initiatives, and amplify the work of local businesses, social enterprises and community organisations.

### **Our approach will involve:**

- Increasing anchor institutes’ membership of the Good Food Procurement Group to eliminate food waste and improve the provision of healthy, sustainable food across the city.
- Collaborating with the South East England Hub 4 Circularity (SEEH4C), on reducing carbon-intensive waste streams like construction waste, water, and food for industrial symbiosis.
- Collaborating with the University of Brighton Southeast Remanufacturing Catalyst (CaRE) to support businesses in the South East region to accelerate net zero and circular economy ambitions through incorporating remanufacturing and value retention processes.
- Working with communities to develop and promote circular living initiatives such as the Climate for Communities project led by Trust for Developing Communities with funding from the National Lottery Climate Action Fund (2025-2028).

## 3. Creating the right conditions for circular business growth

Circular businesses face several specific market barriers that hinder growth and scalability including access to finance, regulatory frameworks built around linear models and inconsistent consumer awareness and demand. Business support plays a critical

role by de-risking investment through grants or blended finance, providing tailored advice and mentoring and facilitating access to networks. We will work with business incubators, accelerators, and enterprise support organisations to equip local businesses with the skills, knowledge, and resources needed to thrive and build capacity.

### **Our approach will involve:**

- Exploring collaborative R&D funding and investment opportunities to accelerate circular growth.
- Raising the profile of circular economy within the local green skills agenda.
- Facilitating industrial symbiosis initiatives where businesses exchange by-products and waste materials as valuable inputs.
- Working with partners to strengthen the local circular business support offer, drawing on insights from our baseline assessment and best practice to address barriers to circular adoption.

## 4. Influencing regional and national policy to unlock circular opportunities

Brighton & Hove will play an active role in shaping the regional and national policy landscape to support a circular economy transition and leverage devolution for circular economy growth.

### Our approach will involve:

- Working with members of the Sussex & Brighton County Combined Authority to encourage the development of a regional Circular Economy Strategy, informed by leading circular economy advisers. This is aimed at decoupling economic growth and material consumption, aligning with the English Circular Economy Growth Plan and facilitating supply chain networking and collaboration to simulate and optimise circular and regenerative regional supply chains at scale.
- Engaging with national and international circular economy experts to identify policy improvements at local, regional, and national levels, ensuring that the policy landscape maximises the benefits of circular economy transitions for Brighton & Hove.
- Driving policy and investment in circular skills and jobs, advocating for policies and investment that expand workforce training, support job creation and develop skills for emerging circular industries.
- Supporting the expansion of Extended Producer Responsibility (EPR) schemes to reduce waste at source.

By embedding these circular economy principles into policy, planning, procurement, business support, and community initiatives, Brighton & Hove will build a more resilient,

inclusive, and sustainable local economy. This transition will create green jobs, reduce environmental impact, and keep resources circulating locally, ensuring the city remains at the forefront of the circular economy movement in the UK.

### How we will deliver

Brighton & Hove City Council is committed to transitioning towards a circular economy by embedding circular principles across its operations, engaging with businesses and communities, and influencing policy at regional and national levels.

To develop a robust sectoral action plan, we have consulted widely with stakeholders across key sectors—including built environment, food, and textiles—to identify opportunities, challenges, and priority actions.

These priority actions can be found in the refreshed Circular Economy Action Plan in Appendix 1. The action plan will be updated regularly based on progress made and the needs of local businesses.

Our approach is informed by a Theory of Change framework, ensuring that interventions are evidence-based, collaborative, and strategically targeted.

This process will be underpinned by a **baseline assessment** carried out in 2026 that:

- Maps local businesses transitioning to circular models and documents key innovations.
- Assesses sector-specific circular economy practices to understand current waste levels, resource use, and business engagement.
- Captures community-led circular initiatives contributing to local sustainability and economic resilience.
- Identifies gaps in business support, highlighting the greatest inefficiencies and opportunities.
- Provides data-driven recommendations to guide policy development, collaboration, and business support services.

### How we will monitor progress

To keep the council and its partners accountable and to encourage continual improvement, we will monitor progress on the four council commitments through the following performance indicators:

- % actions contained within the refreshed Circular Economy Action Plan (Appendix 1) delivered on time and to plan.
- # circular economy projects/initiatives with local private and community and

voluntary sector partners having bid for and successfully attracted external funding, and total value (£) of investment where available.

- # circular economy enterprises and community-led initiatives having received investment, funding or support-in-kind from the council, investors or its partners, and total value (£) of investment where available.
- # of circular innovation initiatives (e.g. startups, spinouts, pilots) supported through city partnerships - including those developing, testing and validating new solutions - and evidence of their progression (such as pilots completed, products launched, investment raised, or jobs created).
- # and % circular economy enterprises and community-led initiatives having reported positive benefits from participating in newly established local or regional circular economy forums/partnerships.
- # traditional SMEs having taken up business support offers that promote and facilitate the adoption of circular economy practices.
- Development of a regional Circular Economy Strategy, informed by leading circular economy advisors, aimed at decoupling economic growth and material consumption, aligned with the national circular economy strategy.

Tracking progress on circular economy goals is challenging, as many indicators don't capture real outcomes and data is often lacking.

Closing this gap requires coordinated action across councils, government, academia and business—through clear standards, robust reporting, better data systems, and open sharing.

The development of business reporting frameworks, such as the European Sustainability Reporting Standards (ESRS), supports the shift to a circular economy. Introduced in 2024, these standards create a consistent approach to measuring circular economy performance and ensure transparent, comparable reporting across all businesses.

Brighton & Hove is already working to narrow these gaps. We are partnering with local universities on baseline assessments to track progress, such as business engagement, local circular innovations, and community-led initiatives. Through the UK Circular Cities network, we share best practice on local data collection and continue to seek funding and partnerships to strengthen monitoring, reporting, and innovation in this area.

## The city's circular achievements to date

In 2018, the city was among the first in the UK to declare a climate and biodiversity emergency, setting the stage for bold climate action. As part of its response to this, the council adopted the first iteration of the **Circular Economy Routemap and Action Plan (2020-2035)**. Since then, emissions have fallen by 23% between 2018 and 2023 (DESNZ local authority GHG statistics).

This Circular Economy Routemap and Action Plan, along with the council's Net Zero Programme targeting energy decarbonisation, will support further city-wide emissions reductions.

The council has played a direct role in advancing circularity through policy and procurement. Between 2020 and 2025 Brighton & Hove has made significant strides in embedding circular economy principles into its policies, economy, and community initiatives.

By embedding circular principles into planning and infrastructure projects, it has encouraged the use of secondary materials in construction.

As the developer of new council housing and other major regeneration projects, the council



is leading the way in specifying circular construction design, materials and methods of construction. For example, all major projects must have a Circular Economy Opportunities Assessment carried out at the start of the project, and from 2026 the council's regeneration service will be monitoring and reporting the share of reused and reusable materials in new major projects.

As an owner of agricultural land, the council is working closely with its tenant farmers to produce farm plans and update lease agreements to drive the adoption of circular, regenerative farming practices at the city's edge – with benefits for consumers, nature and the local chalk aquifer – the city's main supply of clean water.

As a large public sector buyer, the council has put in place new measures to increase the specification of circular economy goods, works and services and to engage existing suppliers around opportunities to strengthen their circular economy knowledge and credentials. These measures include an updated Environmentally Sustainable Procurement Policy; a new Specification-writing Tool for Environmental Procurement (STEP); and delivery of an internal Circular Economy Specification-writing Masterclass with a focus on the built environment.

As the waste collection and disposal authority, the council announced a major expansion of its recycling provision with new materials having been added to collections in 2025, including food waste.

There have been a number of initiatives that the council has supported to stimulate circular growth. These include business grants through the Shared Prosperity Fund, meantime lease for circular businesses and access to circular business support and grant information through the BIPC.

Brighton & Hove has fostered strong partnerships to drive circular innovation. Collaboration between the council, universities, and business networks, such as Circular Brighton & Hove and Brighton & Hove Chamber of Commerce, has helped accelerate circular solutions across multiple sectors.

The city's innovation hubs, including Plus X Innovation and Sussex Innovation Hub, have supported start-ups in developing circular products and business models, while the University of Brighton has connected green enterprises with academic expertise. Plus X Innovation runs a Circular City Exchange, which provides a platform to convene businesses, academia, and communities around circular innovation projects. By championing initiatives like this, the council

can attract external funding and accelerate the scaling of successful circular innovations.

The Living Coast UNESCO Biosphere partners have led high-profile nature restoration projects such as Changing Chalk, and from 2026, the [Local Nature Recovery Strategy](#) will strengthen and focus local biodiversity protection and restoration measures.

Through communications and engagement with households, businesses and communities, the council and its partners have worked in close collaboration to increase local demand for circular economy goods and services.

Between 2021 and 2023 the council, its suppliers and local charities delivered a series of behaviour change initiatives under the EU Interreg-funded BLUEPRINT to a Circular Economy project engaging residents in circular workshops provided by over 15 local circular businesses.

In 2023/24 a business-facing communications campaign on LinkedIn and Instagram, Brighton & Hove Loop, reached more than 40,000 accounts in the first 5 months, gained 1,305 followers, and had a consistently high engagement rate, providing a valuable platform to promote circular business practices and highlight the work of local circular economy entrepreneurs.

The flagship Our City Our World environmental education programme delivered in primary and secondary schools with funding from The Living Coast UNESCO Biosphere continues to educate entire school communities on the environmental and financial benefits of circular living, disseminating information about circular businesses and services on our doorstep, and empowering action from the city's youth.

At a grassroots level, Brighton & Hove has a thriving network of community-led circular initiatives, including the South East England Hub 4 Circularity, The Wood Store, Brighton Repair Café, Smarter Uniforms, Brighton Bike Hub, The University of Brighton Waste House, and The Green Centre. These groups empower residents to embrace reuse, repair, and sharing, fostering a city-wide culture of sustainability.

The city's businesses are also stepping up, with many adopting circular business models and participating in initiatives like Net Zero Champions, a Brighton Chamber programme helping local enterprises integrate circular strategies

A fuller summary of achievements can be found in the 2025 Circular Economy Action Plan Progress Report: [\[Weblink to draft progress report, which brings activity to life\]](#).

## Get involved and inspired

A move to the circular economy must involve stakeholders across the city, including academics, innovators, businesses, institutions, communities and residents.

In Brighton & Hove, there are several circular solutions already in action. To find inspiration

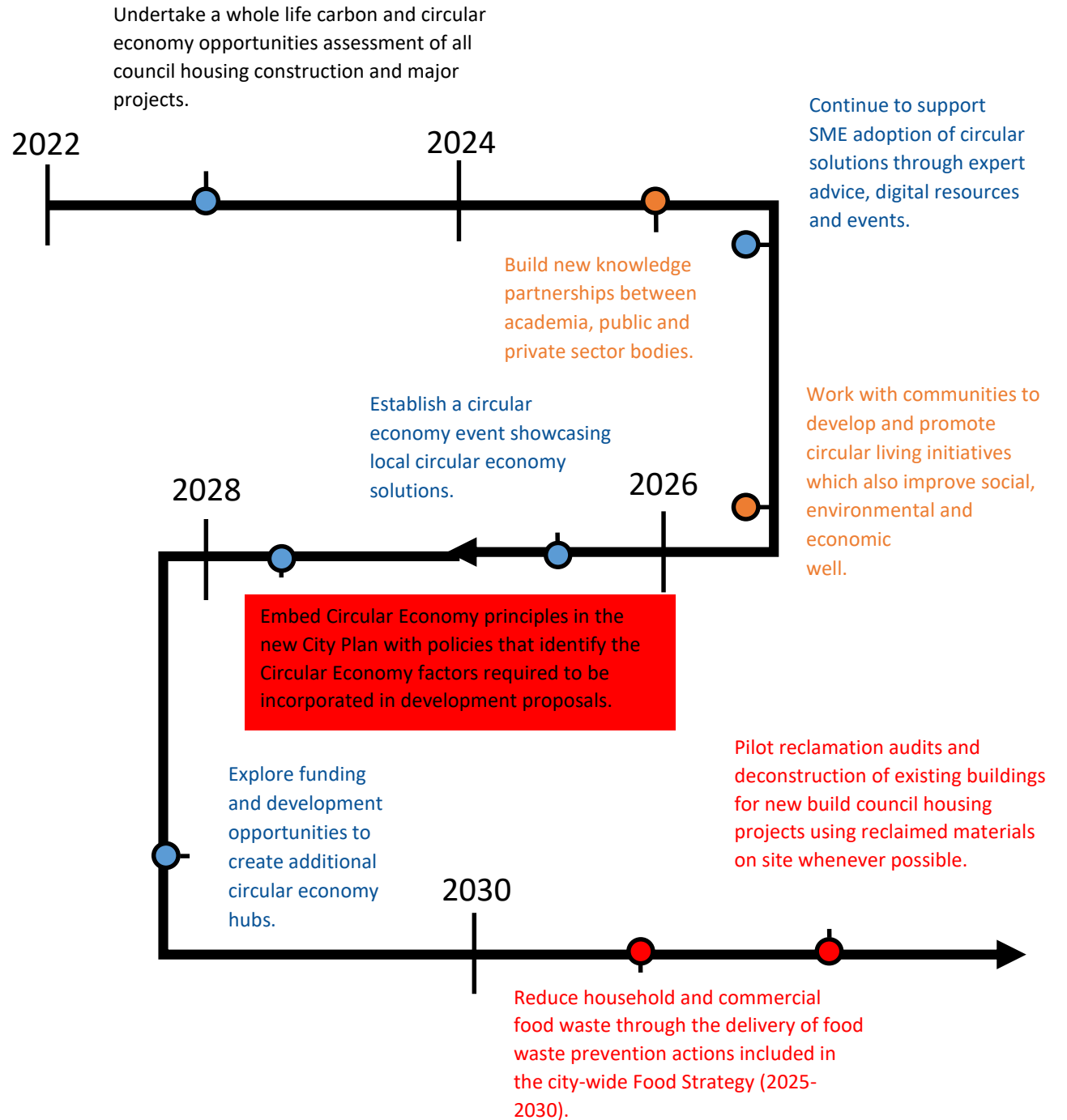
for a new business idea or a potential circular collaboration, you can view these at <https://projectblueprint.eu/solutions>.

Case studies promoted through Brighton & Hove Loop, such as RevaluElectricals, MarinaTex, Brighton Bike Share, and The Brighton & Hove Food Partnership's community composting scheme help bring opportunities to life and show the exciting work happening in the city.

For other case studies and sources of inspiration, visit the Ellen MacArthur Foundation, ReLondon's success stories, and the Circular Economy Institute.

**Council objectives**

- **Objective 1:** Maximise council influence to drive circular demand
- **Outcome 2:** Build strategic partnerships for greater impact .
- **Objective 3:** Create the right conditions for circular business growth .
- **Outcome 4:** Influence regional and national policy to unlock circular economy opportunities .



## Appendix 1: Refreshed circular economy action plan

### Objective 1: Maximise council influence to drive circular demand

Sector	Action	Delivery timeframe	Outcome	Economic challenges met	Delivery partners
Food	1. Create opportunities for local, regenerative food producers or those who want to be farming in ways that are better for the environment and build the supply chain infrastructure that they can tap into.	Short, medium and long-term	Increased adoption of regenerative farming practices, leading to improved soil and water health, increased biodiversity (linking to <a href="#">City Downland Estate Plan</a> ), and lower greenhouse gas emissions. Greater public awareness and support for regenerative farming methods.	Enhancing economic competitiveness  Advancing environmental sustainability	South Downs National Park, Brighton & Hove Food Partnership, Brighton & Hove City Council (BHCC), BHCC's tenant farmers
Food	2. Reduce household and commercial food waste through the delivery of food waste prevention actions included in the city-wide Food Strategy (2025 – 2030) including the introduction of weekly food waste collections for all households across the city by April 2026.	Short and medium-term	<p><b>Outcome 1:</b> Diversion of organic waste from incineration to recycling, improved soil quality, and increased opportunities for local food growing.</p> <p><b>Outcome 2:</b> Cost savings for households and redistribution of surplus food to emergency food services</p> <p><b>Outcome 3:</b> Cost savings for food businesses through more efficient use of food resources and reduced disposal costs</p>	Improving affordability  Reducing social inequality  Advancing environmental sustainability	BHCC (Environmental Services Operations), Brighton & Hove Food Partnership, Sussex FareShare, Food banks and food hubs, community kitchens

<b>Built environment</b>	3. Ensure developments are built to high sustainability and environmental standards and are designed and constructed in line with circular economy principles in construction.	Short, medium and long-term	<p><b>Outcome 1:</b> As part of preparing the City Plan 2041, options for circular economy and whole life carbon requirements of development proposals are explored</p> <p><b>Outcome 2:</b> On all new build council housing and major projects, circular economy opportunity assessments are carried out at the feasibility and throughout early design stages with the aim of circulating elements at their highest value. The reused and recycled content in new build council housing is measured and reported, aiming for 20% of all materials by weight. Materials recoverable at the end of the building's life are measured and reported, aiming for 50% of all materials by 2025 and 60% by 2030. Sustainability outcomes are set based on industry best practice and whole life carbon assessments are undertaken on all council new build housing and major projects to support designers to choose materials, systems, designs, and methods to meet outcomes.</p>	<p>Enhancing economic competitiveness</p> <p>Advancing environmental sustainability</p>	BHCC (local planning authority); Developers including BHCC; BHCC contractors
<b>Built environment</b>	4. Pilot reclamation audits and deconstruction of existing buildings for new build council	Short-term	Pilot projects demonstrate the feasibility and benefits of reclaiming materials from deconstructed buildings	Enhancing economic competitiveness	BHCC (Regen); BHCC contractors ; SEEH4C

	housing projects, using reclaimed materials on site wherever possible.		at their highest value and supports skills development in methods of deconstruction.	Advancing environmental sustainability	
<b>Built environment</b>	5. Continue to invest in preventative maintenance programmes to extend the life of highway assets. Monitor and review new carbon reduction innovations through the network of national and regional bodies that have been set up to share best practice such as the Local Government Technical Advisers Group and Local Council Roads Innovation Group (LCRIG).	Short, medium and long-term	Preventative maintenance and innovate pilot projects that result in longer lasting infrastructure, lower lifecycle costs and reduced environmental impact.	Enhancing economic competitiveness  Advancing environmental sustainability	BHCC (Highways); BHCC contractors; Local Government Technical Advisers Group and Local Council Roads Innovation Group (LCRIG)
<b>Built environment</b>	6. Continue to explore opportunities to embed the principles of the circular economy and other low carbon approaches to highway design and implementation as part of the procurement of new and existing call off contracts.	Short, medium and long-term	The Civil Engineering Design & Transport Planning Services Framework is renewed to ensure capital and operational carbon reduction is considered at the design stages of construction projects through lean design, designing for longevity and flexibility/adaptability and improved material selection. Contractors are required to reduce, monitor and report embodied carbon in transport projects and maintenance programmes.	Enhancing economic competitiveness  Advancing environmental sustainability	BHCC (Highways); BHCC contractors; SEEH4C

<b>Water</b>	7. Develop and begin delivery of a sustainable drainage implementation plan using nature-based solutions to replenish and protect groundwater resources.	Short and medium-term	A sustainable drainage implementation plan is developed and executed, protecting highways and properties from surface water flooding and extreme weather events. This plan also safeguards the chalk aquifer and creates natural habitats for local species, enhancing environmental resilience and biodiversity.	Enhancing economic competitiveness  Advancing environmental sustainability	BHCC (Highways); BHCC contractors; Environment Agency; Southern Water; SEEH4C; OCOW; University of Sussex
<b>All sectors</b>	8. Require the use of the council's Specification-writing Tool for Environmental Procurement on all procurements over £1m and monitor the tool's use and impact on tenders.	Short, medium and long-term	An increasing share of council contracts contains circular economy requirements. This will minimise waste and reduce the material and carbon footprint of council services, as well as promote sustainable procurement practices among local suppliers.	Enhancing economic competitiveness  Advancing environmental sustainability	BHCC (Procurement; All Service Areas)
<b>All sectors</b>	9. Improve the recycling offer of the council's commercial waste management service and increase the number of materials being recycled.	Short-term	Local businesses better supported in their efforts to divert waste from landfill and incineration.	Advancing environmental sustainability	BHCC (Environment Services)
<b>Climate action</b>	10. Explore opportunities to create circular use of green waste produced within the city.	Short and medium-term	Green waste diverted from high-emission scenario processing, to create a carbon negative product.	Enhancing economic competitiveness  Advancing environmental sustainability	BHCC (Net Zero and City Parks)

<b>Climate action</b>	11. Deliver the council's Climate & Nature Action Plan and associated deliverables on reducing waste and consumption emissions	Short, medium and long-term	Reduced city-wide greenhouse gas emissions, support the city to transition to climate resilience and restored local nature.	Advancing environmental sustainability	BHCC (Net Zero and City Parks, Regeneration, Housing, Schools, Transport, Waste) and Living Coast UNESCO Biosphere
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Objective 2: Build strategic partnerships for greater impact

<b>Sector</b>	<b>Action</b>	<b>Delivery timeframe</b>	<b>Outcome</b>	<b>Economic challenges met</b>	<b>Delivery partners</b>
<b>Textiles</b>	12. Establish a city-wide Circular Textiles Forum	Short-term	Circular textiles actions are identified and progressed in collaboration to support the development of this growth sector.	Enhancing economic competitiveness  Improving affordability  Advancing environmental sustainability	BHCC; Sew Fabulous; Smarter Uniforms; SEEH4C; University of Brighton
<b>Food</b>	13. Update the council's Good Food Buying Standards and increase anchor institute membership of the Good Food Procurement Group.	Short-term	Enhanced Good Food Buying Standards lead to healthier, more sustainable food procurement across the city. Increased membership in the Good Food Procurement Group results in co-ordinated efforts to eliminate food waste, benefiting public health and the environment through reduced waste and better nutrition.	Enhancing economic competitiveness  Advancing environmental sustainability	Brighton & Hove Food Partnership; Large food procurers incl. BHCC, Sussex NHS Trust, universities, further education institutes, and other large food procurers such as care homes and events venues



All sectors	14. Build new knowledge partnerships between academia, public and private sector bodies	Short-term	Stronger collaborations between academia, public, and private sector bodies will foster innovation and knowledge exchange, enabling the development and application of emerging technologies, including AI, to advance circular practices. These partnerships will unlock new business opportunities, support data-driven decision-making, and accelerate scalable solutions for a more sustainable and resilient local economy.	Enhancing economic competitiveness  Advancing environmental sustainability	BHCC; Local universities and FE institutes; Brighton Chamber of Commerce; Plus X Innovation; Sussex Innovation; Clean Growth Innovation Hub; Circular Brighton & Hove; SEEH4C; Brighton AI
	15. Formalise a Circular Innovation Consortium to design and deliver innovation challenges linked to city priorities (e.g. construction reuse, local manufacturing, food systems).	Short-term	Creates a structured workstream for piloting and scaling circular solutions, strengthens city capacity to attract external funding, and builds cross-sector innovation capability.	Enhancing economic competitiveness; Optimising commercial spaces; Advancing environmental sustainability	BHCC; Plus X Innovation; University of Brighton; University of Sussex; Brighton Chamber of Commerce; Circular Brighton & Hove
All sectors	16. University of Brighton Southeast Remanufacturing Catalyst (CaRE) to support businesses in the South-East region to accelerate net zero and circular economy ambitions through incorporating remanufacturing and value retention processes.	Short-term	<b>Outcome 1:</b> Improved understanding of VRP status in the Brighton and Hove region to facilitate policy making in the region.  <b>Outcome 2:</b> Increased demand for remanufactured products/goods through awareness raising, training, social media promotion and information presenting (cost, emission, risk for informed decision making.	Enhancing economic competitiveness  Advancing environmental sustainability	The University of Brighton and all CaRE partners

<b>All sectors</b>	17. Work with communities to develop and promote circular living initiatives which also improve social, environmental, and economic well-being.	Short and medium-term	<p><b>Outcome 1:</b> Increased demand for circular products and services, participation in community-led circular economy initiatives, and community cohesion.</p> <p><b>Outcome 2:</b> Cost of living support through the promotion of third sector initiatives such as repair cafes, free/low-cost borrowing schemes, food redistribution and community cafes.</p>	<p>Improving affordability</p> <p>Reducing social inequality</p> <p>Advancing environmental sustainability</p>	Trust for Developing Communities; SEEH4C; Circular Brighton & Hove; Brighton & Hove Food Partnership; The Living Coast UNESCO Biosphere; OCOW; University of Sussex
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### Objective 3: Create the right conditions for circular business growth

Sector	Action	Delivery timeframe	Outcome	Economic challenges met	Delivery partners
<b>All sectors</b>	18. Continue to support SME adoption of circular solutions and work with partners to strengthen the local circular business support offer, drawing on insights from the baseline assessment and best practice to address barriers to circular adoption.	Short and medium-term	This support facilitates the adoption of circular economy practices leading to reduced waste, increased resource efficiency, and enhanced business sustainability.	<p>Enhancing economic competitiveness</p> <p>Advancing environmental sustainability</p>	Brighton Chamber of Commerce; Business & IP Centre; Growth Hub; SEEH4C; Plus X Innovation; Sussex Innovation; University of Sussex; Clean Growth Innovation Hub (University of Brighton) Brighton B Local
<b>All sectors</b>	19. Explore funding and development opportunities to create additional circular economy hubs.	Short and medium-term	The development of circular economy hubs provides dedicated spaces for start-ups, secondary material commerce, research, education and events. These hubs become innovation centres, fostering collaboration and	<p>Optimising commercial spaces</p> <p>Improving affordability</p>	BHCC; SEEH4C; University of Brighton; University of Sussex

			supporting the growth of circular economy initiatives within the city.	Advancing environmental sustainability	
<b>All sectors</b>	20. Raise the profile of circular economy within the local green skills agenda.	Short-term	Education and training providers are encouraged to explore an expanded definition of 'green skills' to include those needed to extend the life and reduce the environmental impact of materials and goods designed, consumed and/or disposed of in Brighton & Hove. Opportunities to expand the local circular economy training offer are explored through new and existing fora.	Reducing social inequality  Advancing environmental sustainability	BHCC; Education and training providers; Sussex Chambers LSIP; Brighton B Local
<b>All Sectors</b>	21. Facilitate industrial symbiosis initiatives such as the South East Circular Hub funded by Horizon Europe 2024.	Short, medium and long-term	Businesses exchange rather than dispose of valuable by-products and waste materials that can be used as inputs into other industrial processes, lowering material costs and creating new revenue streams.	Enhancing economic competitiveness  Advancing environmental sustainability	SEEH4C (Tech-Takeback; Kent County Council; Claire Potter Design; Ecowise)
<b>All sectors</b>	22. Establish a circular economy event showcasing local circular economy solutions, bringing together business innovations, green skills access and community initiatives.	Short-term	The event creates a platform for local businesses, communities and educational institutions to showcase their circular economy initiatives, facilitating peer learning and knowledge exchange. This exposure enables adoption of best practices, drives innovation, and strengthens the local circular economy network.	Enhancing economic competitiveness  Advancing environmental sustainability	Brighton MET; Brighton & Hove Food Partnership; Circular Brighton & Hove; Brighton Chamber of Commerce; Plus X Innovation; University of Sussex; Clean Growth Innovation Hub (University of Brighton); BHCC; SEEH4C; Trust for Developing Communities

<b>All sectors</b>	23. Implement circular economy learning and action in schools through the Our City, Our World (OCOW) environmental education programme.	Short-term	<p><b>Outcome 1:</b> Enhanced awareness and engagement of students in circular economy practices, fostering a generation of environmentally conscious individuals and increased demand for circular products and services.</p> <p><b>Outcome 2:</b> Waste minimisation in schools and school participation in sustainable food systems.</p> <p><b>Outcome 3:</b> Skills.</p>	<p>Reducing social inequality</p> <p>Advancing environmental sustainability</p>	OCOW; BHCC; Brighton Schools; School meal providers; Brighton & Hove Food Partnership; The Real Junk Food Project; Farm School
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Objective 4: Influence regional and national policy to unlock circular economy opportunities

<b>Sector</b>	<b>Action</b>	<b>Delivery timeframe</b>	<b>Outcome</b>	<b>Economic challenges met</b>	<b>Delivery partners</b>
<b>Government</b>	24. Explore with neighbouring authorities the development of a regional Circular Economy Routemap	Medium Term	A regional Circular Economy Routemap developed with input from national and international experts, aligned with the national Circular Economy Roadmap.	<p>Enhancing economic competitiveness</p> <p>Improving affordability</p> <p>Reducing social inequality</p> <p>Advancing environmental sustainability</p>	Neighbouring authorities and DEFRA Circular Economy Taskforce and Pathfinders

<b>All sectors</b>	25. Baseline circular business activity and identify circular economy infrastructure needs and growth sectors for the region.	Short-term	Unlock opportunities for regional economic growth, decoupled from material consumption, greenhouse gas emissions, waste and pollution.	Enhancing economic competitiveness	BHCC; University of Brighton; University of Sussex; SOENECS
<b>All sectors</b>	26. Support the expansion of Extended Producer Responsibility (EPR) schemes to reduce waste at source.	Short and medium-term	Engage and respond to central government consultation, clearly demonstrating support for policy improvements that reduce consumption and waste at source.	Enhancing economic competitiveness	BHCC, EMF, WRAP
<b>Government</b>	27. Engage with national and international circular economy experts to identify policy improvements at local, regional, and national levels, ensuring that the policy landscape maximises the benefits of circular economy transitions for Brighton & Hove.	Short, medium and long-term	Growth opportunities for local academic, design and tech sectors secured through a strengthened policy focus on waste <i>prevention</i> and targeted intervention at the design and use stages of product lifecycles.	Enhancing economic competitiveness  Optimising commercial spaces  Improving affordability  Reducing social inequality  Advancing environmental sustainability	National government departments; Circular Brighton & Hove; ReLondon; Ellen MacArthur Foundation; Clean Growth Innovation Hub (University of Brighton); University of Sussex
<b>All sectors</b>	28. Drive policy and investment in circular skills and jobs, advocating for policies and investment that expand workforce training, support job creation and develop	Short and medium-term		Enhancing economic competitiveness  Reducing social inequality	LSIP; SEEH4C

	skills for emerging circular industries.			Advancing environmental sustainability	
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## Appendix 2: List of city partners

### Public sector bodies

- The UK Government has a legislative leadership role, introducing policies that promote reducing, reusing, repairing, and recycling. Examples of recent policy innovations include a Deposit Return Scheme for beverage containers and Extended Producer Responsibility (EPR) for packaging.
- Brighton & Hove City Council – Leads and develops policies that support the circular economy, participates in national and international networks such as ReLondon's Circular Cities Network and the Ellen MacArthur Foundation's Circular Cities Stand-up, to learn from and share best practice, deliver circular projects, and maximise public resources to support local businesses and residents in adopting circular practices. The council as an asset owner can support innovation by identifying opportunities to act as a testbed using its assets.
- University Hospitals Sussex NHS Foundation Trust – Participates in the Circular Economy Healthcare Alliance to reduce consumption, waste and carbon emissions.
- The Living Coast UNESCO Biosphere – Supports circular, regenerative initiatives across the urban, rural, and marine environment.

### Circular business models and initiatives

- Bus services, Brighton & Hove's Bikeshare Scheme and Electric Brighton – Encourages shared mobility and reduces the need for private vehicle ownership.
- Recorra and Compost Club – Closed loop recycling services that supply customers with products created from their own waste (e.g. office supplies and compost).
- Harriet's of Hove, Hunglish, Infinity Foods and Kindly – Reducing packaging waste through dry food refill stations.
- Tech-Takeback – offering collection, data erasing and repurposing of end of life household and SME tech for social good.

### Business networks and innovation hubs

- Brighton & Hove Chamber of Commerce – Supports circular business models through initiatives including Net Zero Champions.
- Plus X Innovation Hub – Supports and hosts start-ups like MarinaTex, Natural Negative, Batch.Works, and Samudra Oceans, which develop circular solutions.
- Sussex Innovation Hub – Connects university research with businesses to commercialise circular economy solutions.
- Clean Growth Innovation Hub at the University of Brighton - accelerates the translation of leading academic research into beneficial real-world outcomes.

- B Corp business network – Business network of certified B Corp businesses in Sussex, sharing best practice and creating collaborative opportunities to enable the adoption of circular and other sustainable business practices.
- EU Horizon 2024 funded South East England Hub 4 Circularity – A collaborative project led by Tech-Takeback, facilitating the exchange of end-of-life materials across the region.
- The wide range of co working spaces in the city that support start ups, including those focused on circular business models.

## Universities and research institutions

- University of Brighton – Leads research and innovation in sustainable design, including the Brighton Waste House. Embeds sustainability into the curriculum and delivers circular economy initiatives on campus. Supports stakeholders via its Clean Growth Innovation Hub which delivers collaborative research, innovation and skills training to drive circular economy adoption across the city.
- University of Sussex – Leads research and innovation on materials science. Embeds sustainability into the curricula and delivers circular economy initiatives on campus.

## Community and third sector organisations

- Brighton & Hove Food Partnership, The Real Junk Food Project, Sussex Surplus and other members of the city's Surplus Food Network – Address food waste and food insecurity by redistributing and utilising surplus food.
- Fork and Dig it– A regenerative farming project supporting nature restoration and food production.
- Brighton Repair Café, Sew Fabulous, and Brighton Bike Hub – Upskilling residents so they can save money and extend the lifetime of products through repair.
- Charity shops, RevaluElectricals, Freegle, Smarter Uniforms, and Brighton Wood Store – Promote reuse and redistribution of products.
- The Green Centre and Shabitat (Magpie Recycling Co-Operative) – Share information on local recycling and provide supplementary recycling services.
- Brighton Borrowers and Brighton Community Workshop – Support asset sharing to avoid costly purchases of less frequently used items.
- Circular Brighton & Hove – part of the global network of the Circular Economy institute.

## Households and residents

- Residents play a key role in supporting the circular economy by adopting sustainable consumption habits, participating in sharing and repair initiatives, increasing demand for circular products and services, and ensuring proper waste management.



By working together, these partners are helping Brighton & Hove transition towards a more sustainable and circular economy through up, mid and downstream solutions.

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## Circular Economy Routemap 2025 refresh, alignment with Council Plan 2025 - 2027

### Key alignment

#### **Outcome 1: A city to be proud of:**

1.2. An accessible, clean, and sustainable city

**1.2.2 Working towards carbon net zero:** “We will seek to build upon our circular economy achievements through adoption of a new Route Map to continue to engage with DEFRA as one of their ‘pathfinders’ leading the way on developing a more circular and regenerative economy.

Objective 1: Maximise council influence to drive circular demand

Sector	Action	Outcome 1: A city to be proud of	Outcome 2: A fair and inclusive city	Outcome 3: A city that helps people to thrive	Outcome 4: A learning council with well-run services
<b>Food</b>	1. Create opportunities for local, regenerative food producers or those who want to be farming in ways that are better for the environment and build the supply chain infrastructure that they can tap into.	1.1 Investing in our city 1.1. 2 Growing a diverse and sustainable city economy 1.1.3 Promoting and protecting what makes Brighton & Hove unique 1.2 An accessible, clean and sustainable city 1.2.3 Protecting and enhancing the city’s natural environment	2.2 An inclusive and fairer city 2.2.3 Working to reduce inequality  And links to associated objectives in - Brighton & Hove Food Strategy 2025-2030		4.3 Ensuring good governance and financial resilience  We will work to ensure best possible management of available council resources, including council land.

		<p>And links to associated objectives in:</p> <ul style="list-style-type: none"> <li>- Brighton &amp; Hove Economic Plan 2024 - 2027</li> <li>- City Downland Estate Plan</li> <li>- Climate Action Plan</li> </ul>			
<b>Food</b>	<p>2. Reduce household and commercial food waste through the delivery of food waste prevention actions included in the citywide Food Strategy (2025 – 2030) including the introduction of weekly food waste collections for all households across the city by April 2026.</p>	<p>1.2 An accessible, clean, and sustainable city:</p> <p>1.2.1 Keeping our city clean and managing waste</p> <p>“In 2025 we will introduce wider recycling and a phased introduction of a new food waste collection service to the city”</p>	<p>2.2 An inclusive and fairer city</p> <p>2.2.3 Working to reduce inequality</p> <p>And links to associated objectives in</p> <ul style="list-style-type: none"> <li>- Brighton &amp; Hove Food Strategy 2025-2030</li> </ul> <p>“We will continue our work with communities in the most deprived areas of the city to reduce barriers to and increase residents’ confidence and uptake of health and well-being services.</p>	<p>3.3 Living and ageing well</p> <p>3.3.4 Ensuring there is safe, effective, sustainable and high-quality health and care provision in the city</p> <p>And links to associated objectives in</p> <ul style="list-style-type: none"> <li>- Brighton &amp; Hove Food Strategy 2025-2030</li> </ul>	<p>4.1 Innovation and technology at the heart of our strategy</p> <p>“We will research and invest in cutting-edge technologies that deliver tangible benefits in our services for residents and help us keep our running costs low”</p>

			- "The [Fairness fund] will support access to nutritious, low-cost food"		
<b>Built Environment</b>	3. Ensure developments are built to high sustainability standards and are designed and constructed in line with circular economy principles in construction.	1.1 Investing in our city 1.1. 1 Developing Brighton & Hove as a place where people want to live, work, and learn: "We will... shape planning policy that enhances the city's unique built and natural environment, and ensures accelerated housing delivery alongside, employment and infrastructure needs"	2.1 Homes for everyone 2.1.1 Improving housing quality: "We will continue to invest in council homes with almost £37 million allocated to our planned and major works programmes for 2025/26."		4.3 Ensuring good governance and financial resilience  We will work to ensure best possible management of available council resources, including council land.
<b>Built Environment</b>	4. Pilot reclamation audits and deconstruction of existing buildings for new build council housing projects, using reclaimed materials on site wherever possible.	1.1 Investing in our city 1.1. 1 Developing Brighton & Hove as a place where people want to live, work, and learn: "We will... shape planning policy that enhances the city's	2.1 Homes for everyone 2.1.1 Improving housing quality: "We will continue to invest in council homes with almost £37 million allocated to our planned and major works		4.3 Ensuring good governance and financial resilience  We will work to ensure best possible management of available council

		unique built and natural environment, and ensures accelerated housing delivery alongside, employment and infrastructure needs”	programmes for 2025/26.”		resources, including council land.
<b>Built Environment</b>	5. Continue to invest in preventative maintenance programmes to extend the life of Highway assets and monitor and review new carbon reduction innovations via the network of National and Regional bodies that have been set up to share best practice such as the Local Government Technical Advisers Group and Local Council Roads Innovation Group (LCRIG).	1.1 Investing in our city 1.2 An accessible, clean and sustainable city 1.2.4 Making it easier for people to move around the city	2.3 A city where people feel safe and welcome 2.3.2 Creating safe public spaces that are accessible for all		4.3 Ensuring good governance and financial resilience  We will work to ensure best possible management of available council resources, including council land.
<b>Built Environment</b>	6. Continue to explore opportunities to embed the principles of the circular economy and other low carbon approaches to highway design and	1.1 Investing in our city 1.2 An accessible, clean and sustainable city	2.3 A city where people feel safe and welcome 2.3.2 Creating safe public spaces that are accessible for all		4.3 Ensuring good governance and financial resilience  We will work to ensure best possible

	implementation as part of the procurement of new and existing call off contracts.	1.2.4 Making it easier for people to move around the city			management of available council resources, including council land.
<b>Water</b>	7. Develop and begin delivery of a sustainable drainage implementation plan to replenish and protect groundwater resources.	<p>1.1 Investing in our city</p> <p>1.1. 1 Developing Brighton &amp; Hove as a place where people want to live, work, and learn</p> <p>1.1.3 Promoting and protecting what makes Brighton &amp; Hove unique</p> <p>1.2 An accessible, clean and sustainable city</p> <p>1.2.3 Protecting and enhancing the city's natural environment</p>			<p>4.3 Ensuring good governance and financial resilience</p> <p>We will work to ensure best possible management of available council resources, including council land.</p>
<b>All sectors</b>	8. Require the use of the council's Specification-writing Tool for Environmental Procurement on all procurements over £1M and monitor the tool's use and impact on tenders.	<p>1.2 Investing in our city</p> <p>1.1. 1 Developing Brighton &amp; Hove as a place where people want to live, work, and learn</p>			<p>4.3 Ensuring good governance and financial resilience</p> <p>We will work to ensure best possible management of available council</p>



		<p>1.1.3 Promoting and protecting what makes Brighton &amp; Hove unique</p> <p>1.2 An accessible, clean and sustainable city</p> <p>1.2.3 Protecting and enhancing the city's natural environment</p> <p>And links to associated objectives in:</p> <ul style="list-style-type: none"> <li>- Brighton &amp; Hove Economic Plan 2024 – 2027</li> <li>- Climate Action Plan</li> </ul>			resources, including council land.
<b>All sectors</b>	9. Improve the recycling offer of the council's commercial waste management service and increase the number of materials being recycled.	<p>1.2 An accessible, clean, and sustainable city:</p> <p>1.2.1 Keeping our city clean and managing waste</p> <p>"In 2025 we will introduce wider recycling and a phased introduction of a new food waste collection service to the city"</p>			<p>4.1 Innovation and technology at the heart of our strategy</p> <p>"We will research and invest in cutting-edge technologies that deliver tangible benefits in our services for residents and help us keep our running costs low"</p>

<b>Climate Action</b>	10. Explore opportunities to create circular use of green waste produced within the city.	<p>1.1 Investing in our city</p> <p>1.1. 2 Growing a diverse and sustainable city economy</p> <p>1.1.3 Promoting and protecting what makes Brighton &amp; Hove unique</p> <p>1.2 An accessible, clean and sustainable city</p> <p>1.2.3 Protecting and enhancing the city's natural environment</p>			<p>4.1 Innovation and technology at the heart of our strategy</p> <p>"We will research and invest in cutting-edge technologies that deliver tangible benefits in our services for residents and help us keep our running costs low"</p> <p>4.3 Ensuring good governance and financial resilience</p> <p>We will work to ensure best possible management of available council resources, including council land.</p>
<b>Climate Action</b>	11. Deliver the councils Climate Action Plan and associated deliverables on reducing waste and consumption emissions	<p>1.1 Investing in our city</p> <p>1.1. 1 Developing Brighton &amp; Hove as a place where people want to live, work, and learn</p>			<p>4.3 Ensuring good governance and financial resilience</p> <p>We will work to ensure best possible management of available council</p>

		1.1. 2 Growing a diverse and sustainable city economy  1.2 An accessible, clean, and sustainable city  1.2.1 Keeping our city clean and managing waste			resources, including council land.
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Objective 2: Build strategic partnerships for greater impact

Sector	Action	Outcome 1: A city to be proud of	Outcome 2: A fair and inclusive city	Outcome 3: A city that helps people to thrive	Outcome 4: A learning council with well-run services
<b>Textiles</b>	12. Establish a city-wide Circular Textiles Forum	1.1 Investing in our city  1.1. 2 Growing a diverse and sustainable city economy  1.1.3 Promoting and protecting what makes Brighton & Hove unique  1.2 An accessible, clean and sustainable city	2.2 An inclusive and fairer city  2.2.3 Working to reduce inequality		4.3 Ensuring good governance and financial resilience  We will work to ensure best possible management of available council resources, including council land.

		1.2.1 Keeping our city clean and managing waste			
<b>Food</b>	13. Update the council's Good Food Buying Standards and increase anchor institute membership of the Good Food Procurement Group.	<p>1.1 Investing in our city</p> <p>1.1. 2 Growing a diverse and sustainable city economy</p> <p>1.1.3 Promoting and protecting what makes Brighton &amp; Hove unique</p> <p>And links to associated objectives in:</p> <ul style="list-style-type: none"> <li>- Brighton &amp; Hove Economic Plan 2024 - 2027</li> </ul>	<p>2.2 An inclusive and fairer city</p> <p>2.2.3 Working to reduce inequality</p> <p>And links to associated objectives in</p> <ul style="list-style-type: none"> <li>- Brighton &amp; Hove Food Strategy 2025-2030</li> </ul>		<p>4.3 Ensuring good governance and financial resilience</p> <p>We will work to ensure best possible management of available council resources, including council land.</p>
<b>All sectors</b>	14. Build new knowledge partnerships between academia, public and private sector bodies	<p>1.1 Investing in our city</p> <p>1.1. 1 Developing Brighton &amp; Hove as a place where people want to live, work, and learn. "We will work with residents, businesses and our partners to</p>	<p>2.2 An inclusive and fairer city</p> <p>2.2.1 Engagement and collaboration</p> <p>2.3 A city where people feel safe and welcome</p>	<p>3.3 Living and ageing well</p> <p>3.3.4 Ensuring there is safe, effective, sustainable and high-quality health and care provision in the city</p>	<p>4.3 Ensuring good governance and financial resilience</p> <p>"We know that our partnerships are key to delivering for the city."</p>

		<p>shape planning policy that enhances the city's unique built and natural environment, and ensures accelerated housing delivery alongside, employment and infrastructure needs"</p> <p>1.1. 2 Growing a diverse and sustainable city economy</p> <p>"working with our partners to stimulate sustainable economic growth"</p>	2.3.2 Creating safe public spaces that are accessible for all		
<b>All Sectors</b>	15. Formalise a Circular Innovation Consortium to design and deliver innovation challenges linked to city priorities (e.g. construction reuse, local manufacturing, food systems).	<p>1.1 Investing in our city</p> <p>1.1. 1 Developing Brighton &amp; Hove as a place where people want to live, work, and learn. "We will work with residents, businesses and our partners to shape planning policy that enhances the city's unique built and natural environment, and ensures accelerated</p>	<p>2.2 An inclusive and fairer city</p> <p>2.2.1 Engagement and collaboration</p>		<p>4.3 Ensuring good governance and financial resilience</p> <p>"We know that our partnerships are key to delivering for the city."</p>

		housing delivery alongside, employment and infrastructure needs”  1.1. 2 Growing a diverse and sustainable city economy  “working with our partners to stimulate sustainable economic growth”			
<b>All sectors</b>	16. University of Brighton Southeast Remanufacturing Catalyst (CaRE) to support businesses in the South-East region to accelerate Net Zero and Circular Economy ambitions through incorporating remanufacturing and value retention processes.	1.1 Investing in our city  1.1. 2 Growing a diverse and sustainable city economy	2.2 An inclusive and fairer city  2.2.1 Engagement and collaboration		4.1 Innovation and technology at the heart of our strategy  “We will research and invest in cutting-edge technologies that deliver tangible benefits in our services for residents and help us keep our running costs low”
<b>All sectors</b>	17. Work with communities to develop and promote circular living initiatives which also improve	1.1 Investing in our city	2.2 An inclusive and fairer city		4.3 Ensuring good governance and financial resilience

	social, environmental, and economic well-being.	<p>1.1. 2 Growing a diverse and sustainable city economy</p> <p>1.1.3 Promoting and protecting what makes Brighton &amp; Hove unique</p> <p>1.2 An accessible, clean and sustainable city</p> <p>1.2.3 Protecting and enhancing the city's natural environment</p>	2.2.1 Engagement and collaboration		"We know that our partnerships are key to delivering for the city."
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### Objective 3: Create the right conditions for circular business growth

Sector	Action	Outcome 1: A city to be proud of	Outcome 2: A fair and inclusive city	Outcome 3: A city that helps people to thrive	Outcome 4: A learning council with well-run services
<b>All sectors</b>	18. Continue to support SME adoption of circular solutions and work with partners to strengthen the local circular business support offer, drawing on insights from the baseline assessment and best practice to address barriers to circular adoption	<p>1.1 Investing in our city</p> <p>1.1. 2 Growing a diverse and sustainable city economy</p> <p>1.1.3 Promoting and protecting what makes Brighton &amp; Hove unique</p> <p>And links to associated objectives in:</p>	<p>2.2 An inclusive and fairer city</p> <p>2.2.1 Engagement and collaboration</p>		<p>4.3 Ensuring good governance and financial resilience</p> <p>"We know that our partnerships are key to delivering for the city."</p>

		- Brighton & Hove Economic Plan 2024 - 2027			
<b>All sectors</b>	19. Explore funding and development opportunities to create additional circular economy hubs.	<p>1.1 Investing in our city</p> <p>1.1. 2 Growing a diverse and sustainable city economy</p> <p>1.1.3 Promoting and protecting what makes Brighton &amp; Hove unique</p> <p>And links to associated objectives in:</p> <p>- Brighton &amp; Hove Economic Plan 2024 - 2027</p>	<p>2.2 An inclusive and fairer city</p> <p>2.2.1 Engagement and collaboration</p>		<p>4.3 Ensuring good governance and financial resilience</p> <p>“We know that our partnerships are key to delivering for the city.”</p>
<b>All sectors</b>	20. Raise the profile of Circular Economy within the local green skills agenda.	<p>1.1 Investing in our city</p> <p>1.1. 2 Growing a diverse and sustainable city economy</p>	<p>2.2 An inclusive and fairer city</p> <p>2.2.1 Engagement and collaboration</p>	<p>3.2 Developing our prevention and family support offer</p> <p>3.2.2 Working with partners to deliver ambitious employment, training and</p>	<p>4.3 Ensuring good governance and financial resilience</p> <p>“We know that our partnerships are key to delivering for the city.”</p>



		<p>1.1.3 Promoting and protecting what makes Brighton &amp; Hove unique</p> <p>And links to associated objectives in:</p> <ul style="list-style-type: none"> <li>- Brighton &amp; Hove Economic Plan 2024 – 2027</li> <li>- City Downland Estate Plan</li> <li>- Climate Action Plan</li> <li>- Future Skills Sussex Local Skills Improvement Plan</li> </ul>		apprenticeship opportunities	
<b>All Sectors</b>	21. Facilitate industrial symbiosis initiatives such as the South East Circular Hub funded by Horizon Europe 2024.	<p>1.1 Investing in our city</p> <p>1.1. 2 Growing a diverse and sustainable city economy</p>	<p>2.2 An inclusive and fairer city</p> <p>2.2.1 Engagement and collaboration</p>		<p>4.3 Ensuring good governance and financial resilience</p> <p>“We know that our partnerships are key to delivering for the city.”</p>
<b>All sectors</b>	22. Establish a Circular Economy event showcasing local circular economy solutions, bringing together business innovations, green skills access and community initiatives.	<p>1.1 Investing in our city</p> <p>1.1. 2 Growing a diverse and sustainable city economy</p>			<p>4.3 Ensuring good governance and financial resilience</p> <p>“We know that our partnerships are key to delivering for the city.”</p>

<b>All sectors</b>	23. Implement circular economy learning and action in schools through the Our City, Our World (OCOW) environmental education programme.	1.2 An accessible, clean, and sustainable city:  1.2.1 Keeping our city clean and managing waste	2.2 An inclusive and fairer city  2.2.3 Working to reduce inequality  And links to associated objectives in  - Climate Action Plan - The Aquifer Partnership	3.1 A better future for children and young people	4.3 Ensuring good governance and financial resilience  “We will work to ensure best possible management of available council resources, including council land.”
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#### Objective 4: Influence regional and national policy to unlock circular economy opportunities

<b>Sector</b>	<b>Action</b>	<b>Outcome 1: A city to be proud of</b>	<b>Outcome 2: A fair and inclusive city</b>	<b>Outcome 3: A city that helps people to thrive</b>	<b>Outcome 4: A learning council with well-run services</b>
<b>Government</b>	24. Explore with neighbouring authorities the development of a regional Circular Economy Routemap	1.1 Investing in our city  1.1. 2 Growing a diverse and sustainable city economy  And links to associated objectives in:  - Brighton & Hove Economic Plan 2024 - 2027	2.2 An inclusive and fairer city  2.2.1 Engagement and collaboration	3.2 Developing our prevention and family support offer  3.2.2 Working with partners to deliver ambitious employment, training and apprenticeship opportunities	4.3 Ensuring good governance and financial resilience  “We know that our partnerships are key to delivering for the city.”

<b>All sectors</b>	25. Baseline circular business activity and identify circular economy infrastructure needs and growth sectors for the region.	<p>1.1 Investing in our city</p> <p>1.1. 1 Developing Brighton &amp; Hove as a place where people want to live, work, and learn: “We will... shape planning policy that enhances the city’s unique built and natural environment, and ensures accelerated housing delivery alongside, employment and infrastructure needs”</p> <p>And links to associated objectives in:</p> <ul style="list-style-type: none"> <li>- Brighton &amp; Hove Economic Plan 2024 – 2027</li> <li>- Future Skills Sussex Local Skills Improvement Plan</li> </ul>			<p>4.3 Ensuring good governance and financial resilience</p> <p>We will work to ensure best possible management of available council resources, including council land.</p>
<b>All sectors</b>	26. Support the expansion of Extended Producer Responsibility (EPR)	1.2 An accessible, clean, and sustainable city:			4.1 Innovation and technology at the heart of our strategy

	schemes to reduce waste at the source	<p>1.2.1 Keeping our city clean and managing waste</p> <p>“In 2025 we will introduce wider recycling and a phased introduction of a new food waste collection service to the city”</p>			<p>“We will research and invest in cutting-edge technologies that deliver tangible benefits in our services for residents and help us keep our running costs low”</p>
<b>Government</b>	27. Engage with national and international circular economy experts to identify policy improvements at local, regional, and national levels, ensuring that the policy landscape maximises the benefits of circular economy transitions for Brighton & Hove	<p>1.1 Investing in our city</p> <p>1.1. 1 Developing Brighton &amp; Hove as a place where people want to live, work, and learn. “We will work with residents, businesses and our partners to shape planning policy that enhances the city’s unique built and natural environment, and ensures accelerated housing delivery alongside, employment and infrastructure needs”</p>	<p>2.2 An inclusive and fairer city</p> <p>2.2.1 Engagement and collaboration</p>		<p>4.3 Ensuring good governance and financial resilience</p> <p>“We know that our partnerships are key to delivering for the city.”</p>

		<p>1.1. 2 Growing a diverse and sustainable city economy</p> <p>“working with our partners to stimulate sustainable economic growth”</p>			
<b>All sectors</b>	<p>28. Drive policy and investment in circular skills and jobs, advocating for policies and investment that expand workforce training, support job creation and develop skills for emerging circular industries.</p>	<p>1.1 Investing in our city</p> <p>1.1. 2 Growing a diverse and sustainable city economy</p> <p>1.1.3 Promoting and protecting what makes Brighton &amp; Hove unique</p> <p>And links to associated objectives in:</p> <ul style="list-style-type: none"> <li>- Brighton &amp; Hove Economic Plan 2024 – 2027</li> <li>- Future Skills Sussex Local Skills Improvement Plan</li> </ul>	<p>2.2 An inclusive and fairer city</p> <p>2.2.1 Engagement and collaboration</p>	<p>3.2 Developing our prevention and family support offer</p> <p>3.2.2 Working with partners to deliver ambitious employment, training and apprenticeship opportunities</p>	<p>4.3 Ensuring good governance and financial resilience</p> <p>“We know that our partnerships are key to delivering for the city.”</p>



# European Circular Cities Declaration

City Name

**In light of the socio-economic impact of the current crisis and of the ongoing climate emergency, we take this opportunity to commit to a circular recovery and a more resilient future. A systemic shift to a regenerative economic model is fundamental to achieving climate neutrality, fostering a thriving society, and keeping resource consumption within planetary boundaries.**

**A circular city is one that promotes the transition from a linear to a circular economy in an integrated way across all its functions in collaboration with citizens, businesses and the research community. This means in practice fostering business models and behaviour which decouple resource use from economic activity by maintaining the value and utility of products, components, materials and nutrients for as long as possible, in order to close material loops and minimise harmful resource use and waste generation. Through this circular transition, we seek to improve human wellbeing, reduce emissions, protect and enhance biodiversity, and promote social justice, in line with the Sustainable Development Goals.**

## We believe that

- Transitioning from a linear to a circular economy is central to our efforts to decouple economic growth from resource use, and achieve a climate neutral, fair and prosperous society
- Local and regional governments have a critical role to play in achieving the systemic and transformative change required and must work actively with all levels of government and stakeholders from civil society, the private sector and the research community in this mission
- Providing a shared, common vision of a circular city can help ensure we are all travelling in the same direction

## We welcome the opportunity this declaration provides to

- Show leadership in choosing a resource efficient, low-carbon and socially responsible development path
- Demonstrate our commitment to act across our administration
- Collaborate with a group of like-minded, ambitious local and regional governments
- Benefit from access to implementation support of expert organisations from across Europe

**By signing this declaration, we commit to using the levers at our disposal coherently across the organisation, including:**

- 1** Establishing clear circular economy goals and strategies to provide a common direction for the local circular transition
- 2** Raising awareness of circular practices across our administration and amongst local citizens and businesses
- 3** Directly engaging local stakeholders from civil society, the private sector and the research community in the development of circular economy plans and initiatives, striving to make the transition inclusive and helping to nurture circular business models such as the sharing and repairing economy
- 4** Embedding circularity principles in urban planning, infrastructure and asset management procedures
- 5** Leveraging public procurement to promote the market for circular products and services
- 6** Applying economic incentives and seeking opportunities to use fiscal measures designed to encourage circular economic and social behaviour
- 7** Fostering an enabling local regulatory framework which allows and encourages secondary material markets, repair, reuse and sharing schemes
- 8** Collaborating with national governments and European institutions to establish an appropriate policy and regulatory framework for the circular transition
- 9** Monitoring the progress made and impacts of our circular economy activities
- 10** Reporting to ICLEI on progress in achieving the above commitments

**Title Firstname Lastname**

City Name

**Partners**



[www.circularcitiesdeclaration.eu](http://www.circularcitiesdeclaration.eu)

# Brighton & Hove City Council

## Cabinet

## Agenda Item 108

**Subject:** Future model of Orbis IT&D, Procurement and Internal Audit services

**Date of meeting:** 22 January 2026

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

**Lead Officer:** Director of Property and Finance

**Contact Officer:** Name: John Hooton  
Email: [john.hooton@brighton-hove.gov.uk](mailto:john.hooton@brighton-hove.gov.uk)

**Ward(s) affected:** All

### For general release

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

- 1.1 This report outlines changes to the delivery model for our Information Technology & Digital (IT&D) services, Procurement services and Internal Audit to support the delivery of a responsive and well-run council. As the council continues to innovate and provide services that put the needs of residents, local businesses and visitors at the heart of everything we do, it has become clear that changes are needed to how we provide some of our corporate services. Bringing IT&D and procurement (currently run as a shared service called 'Orbis' with East Sussex and Surrey County Councils) into direct control will support our ambition to increase the use of digital and technology to innovate how we work, improve our procurement and contract management processes and support new ways of working that will meet changing needs, increasing demand and significant financial pressures.
- 1.2 Cabinet approval is sought to revise the future shared delivery model for the Internal Audit service and disaggregate our IT&D and Procurement services from the Orbis Partnership. In respect of the latter two, Brighton and Hove City Council (BHCC) will be responsible for management of all BHCC staff, responsibilities and ownership of relevant contracts, and establishing sovereign services aligned to Council priorities.

#### 2. Recommendations

- 2.1 Cabinet agrees to end the shared IT&D service arrangements with East Sussex County Council (ESCC) and Surrey County Council (SCC) under the Orbis Partnership.
- 2.2 Cabinet agrees to continue sharing core data centres with SCC subject to appropriate contractual agreements being in place.



- 2.3 Cabinet approves the additional recurring revenue budget of £457,000 to fund and establish a sovereign IT&D service for Brighton & Hove City Council.
- 2.4 Cabinet agrees to delegate authority to the Corporate Director, City Operations, in consultation with the relevant cabinet member, to take any action necessary or incidental to the implementation of the above including (but not limited to) agreeing the new structure for a Brighton & Hove City Council IT&D service, and entering into partnership or contractual agreements with ESCC and SCC regarding data centres.
- 2.5 Cabinet agrees to end the shared procurement service arrangements with ESCC and SCC under the Orbis Partnership.
- 2.6 Cabinet agrees to delegate authority to the Director of Property and Finance, in consultation with the relevant cabinet member, to take any action necessary or incidental to the implementation of the above including (but not limited to) agreeing the new structure for a BHCC procurement service.
- 2.7 Cabinet notes that the future model of the Internal Audit service will move away from the current Orbis Partnership service and authorises the Director of Property and Finance to work on the development of a shared Internal Audit service with ESCC.
- 2.8 Cabinet notes that the other services within the Orbis Partnership will remain, including the centres of excellence for treasury management and insurance and claims handling.

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

- 3.1 BHCC entered the arrangements within Orbis on 1<sup>st</sup> April 2017, following agreement at the Policy, Resources and Growth Committee on 13<sup>th</sup> October 2016<sup>1</sup>. Since that time, the benefits of shared resources have allowed for significant cost efficiencies to be made against our budget.
- 3.2 Orbis is a strategic shared services partnership between BHCC, ESCC, and SCC. Orbis is governed by a Joint Management Board (JMB), that comprises a senior officer at each of the partner councils.
- 3.3 Throughout 2025, there have been reviews undertaken of the services within the Orbis Partnership. In-depth reviews of Procurement and IT&D services have been completed, and the review of Internal Audit services is ongoing.
- 3.4 The work undertaken included conducting interviews, reviewing documentation and referring to examples from elsewhere across the sector to bring lessons learned and good practice. Further engagement with stakeholders within BHCC and relevant cabinet members also informed these proposals. The reviews identified:

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<sup>1</sup> <https://democracy.brighton-hove.gov.uk/documents/s101476/Item%2055%20-%20Orbis%20Partnership%20PRG%20Report.pdf>

- That staff across each service had significant expertise across the three Councils and were valued and respected across the respective organisations.
- Internal Audit functioned effectively and the shared service arrangements provide benefits in ensuring the relative independence of the function, and the ability to share resources and expertise across the partnership.
- There remain benefits and efficiencies to continue sharing data centres for IT&D services (see 3.7 and 4.4 below).

However, the model of delivery through the Orbis partnership highlighted several challenges that include:

- Lack of historic flexibility and agility; particularly its failure to drive transformative digital innovation in each of the participating authorities
- Lack of clear ownership of tasks between procurement and other service areas, operating across multiple procurement platforms; operational silos at senior management level; pay disparities and recruitment challenges and risks associated with a lack of clarity.
- Orbis works largely 'despite' rather than 'because' of the effectiveness of the current operating model. Orbis is a brand rather than a legal entity, and Orbis faces numerous challenges and inefficiencies to effective and efficient service delivery.
- The procurement service is not 'visible' in terms of both people and activities and it's not clear if it is delivering value for money (VFM) particularly in terms of roles of some parts of the service.
- BHCC requires a different procurement approach and technology solutions to the other two partners. As a unitary authority, it is responsible for additional services beyond those of the county councils, including housing, planning, waste, sport and leisure facilities, environmental health, council tax and business rates.

3.5 Therefore, the option, supported by the options appraisal, concluded that a sovereign model for IT&D and Procurement is the preferred option to provide the autonomy needed to provide services that will align fully to the Council Plan priorities and provide the support needed for innovation and transformation.

3.6 Should a sovereign model of delivery for IT&D and procurement services be agreed, careful consideration will need to be given to transitional arrangements to ensure continuity of service, as well as ensuring that future arrangements for shared activity is properly worked through.

3.7 BHCC officers concur with the findings of the IT&D review that a shared data centre should be maintained between the three councils. Our data centre, hosted by SCC, stores most of our organisation's data and systems. Data centres are a costly capital investment which is best shared; migrating to other options takes considerable planning and cost, which is infeasible to achieve in a short timetable. It is sensible and prudent to continue this arrangement for the immediate future pending any fuller review. These costs are already budgeted for as part of our existing agreement, and will continue.

- 3.8 Beyond maintaining the service at its current level of capability, BHCC aspires to invest in technologies that help it combat financial pressures and deliver services more efficiently and to a higher quality. Over the last six months, officers have run a programme of technology tests (“Turbocharging Innovation”) which has successfully identified technologies and tech projects that will deliver substantial efficiencies.
- 3.9 Owing to the need to bring in new skills to deliver the technologies which help the City Council balance the budget, officers will bring forward plans for a further investment in the IT service at part of the 2026-27 budget, incorporating both the costs of investment and the proposed savings to BHCC.
- 3.10 As part of BHCC’s wider organisational transformation, and the opportunities presented by merging the current mix of sovereign and shared services, the Council has the opportunity to consolidate all technology skills and support into a single IT service (“functional alignment”). Similarly, procurement functions will be aligned into a single service. Officers will undertake this work, migrating and consolidating roles and capabilities to drive greater efficiency.

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

##### **IT&D service**

- 4.1 As there is no support from the other two partners for a continued partnership for fully integrated IT&D services, BHCC has no choice but to exit the partnership.
- 4.2 Both the Director of Digital Innovation and the Chief Digital and Information Officer of Orbis IT&D have contributed to proposals offering a variety of delivery models for IT&D services.
- 4.3 Conversations were held with relevant executive directors from both other two partners to explore options for a reformed IT&D partnership, but it was made clear that there was no political support for this in either authority.
- 4.4 The cost of sovereign data centres would be an unnecessary additional cost to all partners and yield no tangible benefits. Further, migrating a data centre of our complexity is normally a piece of work measured in years, carrying significant cost. It would not be feasible to achieve this on the same timetable, notwithstanding the lack of clear benefits to BHCC. There are therefore no beneficial alternatives to continuing this provision.
- 4.5 The only alternative option relates to the cost of the service; that is, BHCC could choose not to fund critical staff positions made vacant by the loss of shared sovereign ESCC and SCC staff. We deem this an unacceptable risk to a critical service, as it would remove skills needed for the service to function, resulting in a significant risk of catastrophic failure of IT systems and their supporting processes.

## Procurement service

- 4.6 Alternative options were considered in the initial review of the procurement service and reviewed by all partners. The options considered were:
- The current operating model - staff within the service are employed by one of the three partner authorities. Services are shared based on an Inter Authority Agreement.
  - Sovereign model - each Authority will be responsible for managing their own procurement service including people, systems, resources and operational teams.
  - Local Authority Trading Company (LATCo) - a commercial entity that is wholly or jointly owned by a local authority. They operate as commercial companies.
  - A hosted model - a procurement service is hosted by one local authority and provides the procurement service to other authorities or public bodies.
  - A local authority joint committee - a group formed by two or more local authorities to jointly discharge certain functions. This is often done through a formal agreement under Section 102 of the Local Government Act 1972.
- 4.7 All options had an initial analysis of advantages and disadvantages with a strategic and achievability lens, and then a full options appraisal process has further considered the hosted model, sovereign model and LATCo in relation to financial cost, efficiencies, compliance with the National Procurement Policy Statement and the context of Local Government Reorganisation (LGR).
- 4.8 Although the LATCo model scored highly strategically, the costs associated with this and the timing of LGR would suggest that this option is not achievable for at least 5-7 years. There was no appetite for this option.
- 4.9 Upon further review, taking into account the impacts of LGR and following interviews with the JMB, BHCC, ESCC and SCC, there was no appetite from any partner to host a shared service.
- 4.10 Therefore, the preferred option, concluded from the options appraisal, was a sovereign model for procurement services.
- 4.11 The only additional consideration to this option relates to the cost of the service; that is, BHCC could choose not to fund critical staff positions made vacant by the loss of shared sovereign ESCC and SCC staff. We deem this an unacceptable risk to a critical service, as it would remove skills needed for the service to function, resulting in significant risk of procurement failure leading to significant financial, legal and political implications.
- 4.12 While most of the procurement service exists in Brighton and Hove, there are functions that are shared across the current partnership, in particular contract management and the sourcing solutions team (which looks after low value procurement activity). A transition period will be needed to ensure

continuity of these services while expertise is developed within Brighton and Hove.

### **Internal Audit**

- 4.13 The Internal Audit service is widely regarded as a good service across the partnership, adding significant value to the relevant authorities, management teams and Audit Committees. Through discussion with other councils, it has become clear that continuing with the current model of delivery is not possible. From a BHCC perspective, we are keen to retain as much of the current good service as possible, as well as continue to benefit from the economies of scale that a shared arrangement brings. For this reason, officers in BHCC and ESCC are keen to develop a shared model of Internal Audit across the two authorities. If agreed by Cabinet, work to develop this model will be taken forward and a report will come back to Cabinet following the outcome of this work.

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

- 5.1 Stakeholder feedback was gathered from officers across all three local authorities through surveys and interviews. This has shaped the proposals going forward.
- 5.2 BHCC's Corporate Leadership Team and relevant cabinet members, the Cabinet Member for Finance & Regeneration and the Cabinet Member for Customer Services & Public Realm have been kept updated on risks, cost and planning throughout the process.

## **6. Financial implications**

- 6.1 Under the current arrangement the council makes an annual net contribution to the Orbis Partnership of £2.975m of which Procurement totals £1.155m and IT&D £0.994m. Should the recommendation be approved to end the current shared agreement for both services the only contribution remaining would be for Internal Audit, Treasury Management, Insurance and the cost of the data centre, all of which totals £0.882m. This therefore releases £2.093m in budget (£1.155m relating to Procurement and £0.938m to IT&D).
- 6.2 However, the creation of a sovereign Procurement and IT&D Service would replace this cost. The proposed Procurement structure still needs to be confirmed however; the initial review looks to increase the Procurement service but at the same time realising a saving for the council which is currently being considered as part of the 2026/27 budget setting process. This is a result of having a structure that would be suitable for the council and not carrying the cost of other organisations.
- 6.3 Initial structure proposals for IT&D indicate recurring budget pressure funding is required of £0.457m. This funding will enable the service to provide the same level of support provided under the current Orbis arrangement. Any further investment would be subject to business cases being approved outlining the value for money and investment return. The

recurring pressure of £457k is included within the 26/27 budget proposals and was built into the December 2025 budget update to Cabinet.

- 6.4 If approved, from financial year 2026/27 budgets will be varied from the current line of 'Orbis Contribution' to the relevant directorates, meaning Procurement budgets will fall within Finance & Property and IT&D within City Operations.
- 6.5 Costs associated with the data centre and Schools ICT are included within the Council's ICT budgets for 2025/26 and will continue to be funded from these budgets in 2026/27. No separate or additional budget provision is required for these areas, as they remain part of the core ICT financial planning.
- 6.6 Financial modelling on the Internal Audit service suggests that setting up a sovereign (in-house) Internal Audit service would be more expensive (£58k) than the current Orbis arrangement, but if a model was developed across BHCC and ESCC, the cost would be broadly the same as the current cost.

Name of finance officer consulted: Craig Garoghan      Date consulted: 05/01/2026

## **7. Legal implications**

- 7.1 The Council may vary the services under the Orbis Partnership by agreement with the partner Councils. Legal due diligence will be required before seeking to agree and implement the proposals and to ensure continuity of service.
- 7.2 The Transfer of Undertaking (Protection of Employment) Regulations 2006 (the "regulations") will apply to any employee currently employed by ESCC or SCC where it is assessed that the majority or a substantial part of their work is undertaken on behalf of BHCC and not the two other partners. If this is the position, then consultation will have to be undertaken with the affected employees. Further, the regulations will apply to any employee currently employed by BHCC where it is assessed that the majority or a substantial part of their work is undertaken on behalf of ESCC and/or SCC and not BHCC. Early assessment indicates that TUPE is unlikely to be a significant factor in this disaggregation.

Name of lawyer consulted: Siobhan Fry      Date consulted: 05/01/2026

## **8. Risk implications**

- 8.1 'Failure to invest in and maximise use of digital technology to enable a responsive council with well-run services' and 'failure to procure and manage contracts to ensure value for money and achieve the best outcomes for the city' are strategic risks for BHCC.

- 8.2 With regards to IT&D contracts, as most of these are held directly by BHCC, we do not see any contractual risks. The remainder relate to smaller contracts that will either be unaffected by a loss of economies of scale, or else can be discontinued to balance any rises in cost beyond normal inflation.
- 8.3 There are always inherent risks in changing an organisation's structure and responsibilities. Upon agreement to proceed, an appropriate project manager and HR business partner will be appointed to oversee the mitigation of these risks, specifically:
- *Risk of change for staff.* Any change in structure can be unsettling for staff; we will work to provide clarity and support through an appropriate transition process.
  - *Risk of confusion over responsibilities.* It is important that all current responsibilities are migrated over in the structural change. Current functions performed by Orbis IT&D and Orbis Procurement and particularly those by partnership staff in ESCC and SCC who will no longer work on behalf of Brighton and Hove City Council, will be rehomed appropriately.
  - *Risk to service delivery through transition.* It is important that all responsibilities are covered in the future model for procurement services and there is a detailed transition plan in place. This includes consideration of shared systems and contracts.

## **9. Equalities implications**

- 9.1 The proposed disaggregation moves all responsibilities for Procurement Services and IT&D to BHCC and does not disadvantage or impact any group by nature of their protected characteristics. The equality impacts will, however, continue to be reviewed as implementation progresses.

## **10. Sustainability implications**

- 10.1 There are no sustainability implications arising from this proposal.

## **11. Social Value and procurement implications**

- 11.1 Shared contracts will be reviewed with advice from procurement. Only seven contracts are expected to be continued within IT&D, and these are all well below procurement thresholds. These can be continued and/or reviewed as they come up for renewal.
- 11.2 A separate service level agreement will be entered into with ESCC for the continuation of integrated support and cross-charged resources for Schools ICT to fulfill existing multi-year service agreements with schools.
- 11.3 The future model considers the current shared centralised functions, especially dedicated shared resources in procurement policy, social value, systems and data analytics, to mitigate any potential social value and procurement implications. With autonomy of design over the future model, the City Council can prioritise social value and procurement outcomes.

## **12. Conclusion**

- 12.1 Through a review of the options available and due to the planned withdrawal of our two Orbis partners, and the need to run sustainable IT&D and Procurement services, the proposal to disaggregate IT&D and Procurement services from Orbis is recommended to Cabinet. Internal Audit services will continue to be shared, but will no longer include SCC as a partner.





# Brighton & Hove City Council

## Cabinet

## Agenda Item 110

**Subject:** Housing Management for Brickfields Development

**Date of meeting:** Thursday 22<sup>nd</sup> January 2026

**Report of:** Cabinet Member for Communities, Equalities and Adult Social Care

**Lead Officer:** Name: Corporate Director for Homes & Care

**Contact Officer:** Name: Heather Barfoot, Anne Richardson-Locke

**Email:** [Heather.Barfoot@brighton-hove.gov.uk](mailto:Heather.Barfoot@brighton-hove.gov.uk)  
[Anne.Richardson-Locke@brighton-hove.gov.uk](mailto:Anne.Richardson-Locke@brighton-hove.gov.uk)

**Ward(s) affected:** Wish;

**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 seeks Cabinet approval to grant a 125-year lease to a Registered Provider to provide the landlord and housing management function for the Brickfields building, which will be the site for the new Brickfields Supported Living Service.
- 1.2 The report outlines the background to the development and the rationale for granting a lease to a Registered Provider rather than the alternative options. It sets out the preferred option and how this will ensure maximum revenue to the council.
- 1.3 This proposal accords with the Council Plan 2023 – 2027, specifically:

#### **Outcome 2: A fair and inclusive city: Homes for everyone.**

This development will contribute to the council's goal of delivering accessible, affordable homes for the residents of Brighton & Hove.

#### **Outcome 3: A healthy city where people thrive: Living and ageing well.**

The supported living service will meet a current gap for people with acquired brain injury and physical disability. The lack of available supported living in the city means that too often, people are living inappropriately in residential care or have to move out of the city.

#### **Outcome 4: A responsive council with well-run services.**

People living at Brickfields will need effective housing management from a Registered Provider with the right experience to work with the commissioned support provider. This will ensure that people have a well-run supported living service that is responsive to their needs.

## **2. Recommendations**

- 2.1 Cabinet agrees to the principle of granting a 125-year lease to a Registered Provider for the Brickfields building, along with transfer of liability for the Homes England grant.
- 2.2 Cabinet delegates authority to the Corporate Director – Homes and Adult Social Care in consultation with the Director of Property and Finance and Cabinet Member for Communities, Equalities, Public Health & Adult Social Care to enter into a 125-year lease for the Brickfields building together with all necessary ancillary documentation with a Registered Provider subject to the following conditions:
  - The council's developments costs have been met; and
  - The council achieves the best consideration that can reasonably be obtained when generating the capital receipt for the property.

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

- 3.1 In January 2020 the Health & Wellbeing Board supported the preferred option to develop supported living on the site of the Knoll House care home for people with physical disabilities and acquired brain injuries.
- 3.2 The Supported Living service (now known as Brickfields) will comprise of 27 one-bedroom flats and one two-bedroom flat. It will provide care and support and accommodation for people with acquired brain injuries and/or physical disabilities. It is fully wheelchair accessible throughout, with shared communal spaces on each floor, a laundry, guest room and office & flat for staff. A specialist care and support provider will provide care and support 24 hours a day. Further details of what this includes are set out in 3.13. below.
- 3.3 The development includes 4 flats for young people clustered together with their own communal space and 2 larger flats for people who have larger bodies who have been assessed as needing supported living, and who may need bigger and heavier equipment or wheelchairs. There is also a cluster of 4 flats for people with acquired brain injuries who may need restrictions in place due to memory or cognitive impairments that affect their mental capacity. People in the service may require short term support if they are recovering from an injury or require a period of assessment to ascertain their skills, before moving on to more independent living. Alternatively, people may require longer term support if they have a long term or progressive condition.

- 3.4 A business case was developed in 2020 and engagement with the market indicated that whilst there was a lot of interest from support providers in a contract to provide the specialist care and support there was a reluctance from Registered Providers to put in the capital required to fund the development. The Covid-19 pandemic resulted in high development costs and a cautious market.
- 3.5 The decision was therefore made that the council would develop the building and in July 2021 Policy & Resources Committee approved of the demolition and building of the 3-storey supported living service and a capital programme budget of £10.5m was agreed, to be financed through capital borrowing and a Homes England bid.
- 3.6 Delegated authority was given to the Executive Director of Health and Adult Social Care (in consultation with the Executive Director Finance & Resources) to enter into the necessary contracts (including with a development partner as necessary) to secure:
- (i) the demolition of the existing building;
  - (ii) the Design and Build operations required to complete the development of the Supported Living service at Knoll House as described in this report; and
  - (ii) the housing management, repairs and maintenance function
- 3.7 At this point the decision on whether the council would retain the landlord function or lease it to a Registered Provider had not been made. The option for the council to provide both the landlord and management function in-house has since been considered but the council has limited experience and capacity to manage a specialised supported living service with the level of responsiveness that is required.
- 3.8 The option for the council to remain as landlord and to procure a managing agent was also considered but it would still mean that intensive housing management benefit costs could not be recouped and the council would require additional resources to procure and contract manage the service. This is explored in more detail in 4.2 below.
- 3.9 The recommended option is therefore to lease the building for 125 years to a Registered Provider that has the expertise to manage Specialised Supported Living. Homes England have confirmed that this is acceptable, with grant liability transferring to the Registered Provider. All the intensive housing management benefit costs would be recouped.
- 3.10 The lease will be a full repairing lease whereby the Registered Provider will undertake all landlord functions, including planned and major works, issuing and terminating tenancies; supporting people to maintain their tenancy and to make Housing Benefit claims; managing, maintaining and repairing the building; and dealing with neighbour disputes or complaints about anti-social behaviour. Appropriate covenants will be put in place to ensure that any

change to the use of the building can only be carried out with the council's agreement. They will work closely with the support provider and the council to ensure that people with disabilities and brain injuries are housed and supported appropriately and comply with the Supported Housing (Regulatory Oversight) Act 2023.

- 3.11 The Brickfields supported living service will be added to the council's allocation policy in order to nominate suitable people to live in the service. The council will have 100% nomination rights on initial lettings and all future re-lets.
- 3.12 In line with the Homes England grant requirements, the units will be let at social rent levels on assured tenancies with additional service charges for the intensive housing management support required by tenants. The council will be able to recoup the full amount from central government so long as the landlord is a Registered Provider.
- 3.13 The table below sets out the roles and responsibilities of the Registered Provider and the Care and Support Provider.

Registered Provider	Care and support provider
Landlord for tenancy purposes – responsible for consumer standards under the Social Housing (Regulation) Act 2023	24-hour care and support
Rent setting and collection	Assistance with daily living (e.g. cooking, cleaning, personal care)
Capital investment in planned and major works	Support with medication
Repair & maintenance of external fabric of building	Support with physical and mental health
Insuring the building	Help with budgeting and managing finances
Maintaining Fire Risk Assessment under The Regulatory Reform (Fire Safety) Order 2005	Coordinating activities to promote inward-facing community building
Issuing tenancies	
Enforcing tenancy conditions and taking court action to obtain possession as necessary	
Tenant support with tenancy sustainment	
Setting service charges	
Internal repairs, maintenance and servicing	
Voids management	
Cleaning all communal areas and guest room, and waste management	
Grounds maintenance and building security	
Coordinating activities to promote outward-facing community building	

- 3.14 A suitably qualified and experienced housing provider will be sought and market engagement indicates that there is interest from the market of Registered Providers in the council's Affordable Housing Delivery Partnership and specialist providers working nationally.
- 3.15 The procurement of a care and support provider is already underway as set out in the Annual Procurement Forward Plan agreed at Cabinet on 13 February 2025. It is a three-stage Competitive Flexible Procedure, that includes a dialogue stage. The first stage of the procurement has been completed, and the second stage was published at the end of October. The current procurement timeline has the contract award at the end of May 2026. There will be a three-month mobilisation period starting in June 2026, with the service starting in September 2026 (subject to appropriate housing management, repairs and maintenance being in place).
- 3.16 Tenants will be assessed as to whether they need to contribute to or fully fund their care and support. Community care funding will cover someone's care costs if they have been assessed as not needing to make a contribution, or cover the rest of their care costs minus any contribution they have to make. A tenant will need to fully fund their rent costs if they are not entitled to Housing Benefit. If they are, then they will be supported to apply for this which will either pay some of or all of their rent and eligible service charges.

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

- 4.1 In considering the housing management at Brickfields two alternative options were explored as well as the recommended option.
- 4.2 **Alternative option 1: Council acts as landlord and procures an external managing agent** This option would be acceptable to Homes England and meet the grant conditions but the council would not be able to recoup any of the intensive housing management benefit paid out to Brickfields' tenants in subsidy. Additionally, most tenants would acquire secure tenancies for life, with the associated Right to Succession. This could lead to people without care and support needs living in the building after the main tenant had died. There would also be no limitations on their need for the care and support provided,, so people whose support needs had changed and could no longer be met by the care and support provider or who no longer had support needs could continue to live in the building. A Registered Provider would have grounds to seek possession in these cases under the Renters Rights Act. Tenants would not however have the Right to Buy their homes.
- 4.3 **Alternative option 2: Council act as landlord and provide the housing management.** This option would be acceptable to Homes England and meet the grant conditions but the council has limited experience of managing a specialist supported housing service. The council would also be accountable for meeting the Consumer Standards under Social Housing (Regulation) Act 2023, and would have to build new capacity to satisfactorily deliver a specialist supported housing service at a time when teams are

under significant pressure with the LPS work and implementing the requirements of the Social Housing (Regulation) Act 2023 across the entire HRA stock, The associated issues of tenants having secure tenancies from the council outlined in paragraph 4.2 would also apply.

- 4.4 **Recommended option:** Grant a 125-year lease to a Registered Provider and transfer the Homes England grant liability for the reasons outlined in 3.9 above.

## **5 Community engagement and consultation**

- 5.1 There has been ongoing community engagement during the planning and construction phases of the Brickfields development. There has been broad local support for the service, and the gap that it will fill in meeting the needs of people with physical disability and acquired brain injury. The Registered Provider will need to demonstrate suitable experience and capacity to ensure that neighbours' concerns about the Brickfields supported living service are addressed and that the Brickfields tenants are able to integrate into the local community. To date, the main areas of concern expressed by the community are the alterations being made to landscaping and paths in shared areas to accommodate wheelchair users.

## **6. Financial implications**

- 6.1 The capital receipt will need to cover the net development cost and unfunded borrowing cost for 50 years. With this option 100% of the intensive housing management costs can be recouped.

Name of finance officer consulted: Jane Stockton      Date  
consulted: 07/01/26

## **7. Legal implications**

- 7.1 The council has the legal power to dispose of the property pursuant to section 123 of the Local Government Act 1972 which allows the disposal of property subject to obtaining the best consideration reasonably obtainable.

- 7.2 It is proposed that the Registered Provider will be required to take on the lease with a requirement to enter into the contractual arrangements with the support provider as procured by the council. Further legal agreements may be necessary to secure use of the property in the same manner beyond the term of the proposed provider contract and this will be the subject of further legal advice.

Name of lawyer consulted: Siobhan Fry      Date consulted: 23/12/25

## **8. Risk implications**

- 8.1 The table below sets out the potential key risks and planned mitigations:

<b>Risk</b>	<b>Impact / mitigation</b>
Not being able to find an appropriate Registered Provider to lease the building to	<p>Initial market engagement of potential Registered Providers has been carried out, that indicates that there are Registered Providers who would be interested.</p> <p>If no Registered Provider can be found, then Alternative Option 1: Council acts as landlord and procures an external managing agent will be explored instead.</p>
The Registered Provider changing the use of the building from supported living	Appropriate covenants will be put in place to ensure that any change to the use of the building can only be carried out with the council's agreement.
Not being able to cover the council's development costs	An independent valuation will be sought and this risk is considered unlikely but would have a significant impact. If the council's costs cannot be covered then Alternative Option 1: council acts as landlord and procures an external managing agent will be explored instead.
<p>Delay in arranging a lease with an identified Registered Provider leading to a delay in the anticipated start date of the supported living service.</p> <p>It is already anticipated that there will be a period between the completion of the building construction and anticipated start of the care and support service, so the council will need to arrange and pay for security during this period.</p> <p>Any further delay would increase these costs.</p>	Legal and Estates resource for arranging the lease will be expedited and prioritised to mitigate this risk.

## **9. Equalities implications**

- 9.1 The Registered Provider will be integral to ensure the supported living service at Brickfields is delivered well. The service will seek to fully meet the needs of people living there, ensure accessibility, prevent discrimination and promote independence. An Equalities Impact Assessment is in draft to be fully completed after the care and support tender is awarded and highlights the positive impact on people with a physical disability and acquired brain injury, as well as more specifically younger people and people with larger bodies.



- 9.2 The sourcing process for a Registered Provider would require interested Registered Providers to demonstrate their understanding of equalities and the kinds of needs that people living at Brickfields will have.

## **10. Sustainability implications**

- 10.1 The Registered Provider selection process will require interested parties to demonstrate their organisation's corporate commitment to sustainability and how they will support the council's work to reduce carbon emissions and become a carbon neutral city by 2030.

## **11. Health and Wellbeing Implications:**

- 11.1 The Brickfields supported living service is designed to address a significant gap in provision for people with acquired brain injuries and physical disabilities in Brighton & Hove and to improve both physical and mental health outcomes for residents. The council will select a Registered Provider who is committed to improving the health and wellbeing of its tenants and can demonstrate an understanding of equalities and will facilitate integration of tenants into the local community.

## **Other Implications**

## **12. Procurement implications**

- 12.1 The granting or assignment of a lease is exempt from the Procurement Act 2023 and therefore out of scope for Procurement. The provision of the separate Care and Support Contract is in-scope and is already being tendered as detailed above.
- 12.2 The Registered Provider selection process will require interested parties to demonstrate their corporate commitment to delivering social value through the Brickfields Supported Living Service, and in particular how they are or will work with their contractors and suppliers.

## **13. Crime & disorder implications:**

- 13.1 The planned supported living service has been assessed as not having the potential to heighten community tension, reduce cohesion or contribute to crime and disorder.
- 13.2 The Registered Provider will need to have suitable experience to appropriately support people living in the service who may have additional support needs in relation to community safety and will need to work in partnership with the commissioned support provider to do this effectively.
- 13.3 The Registered Provider will also need to consider how crime and disorder may affect people living in the service and demonstrate how they will

manage anti-social behaviour exhibited towards tenants as part of the selection process.

## **14. Conclusion**

- 14.1 The recommendation to grant a 125-year lease of the Brickfields Supported Living development to a Registered Provider is justified by the need to ensure high-quality, responsive housing management, in line with the council's strategic objectives. This approach addresses a significant local gap in supported living, enables the council to recoup intensive housing management benefit costs, and ensures compliance with Homes England grant requirements and the Social Housing (Regulation) Act 2023. Alternative options - such as the council acting as landlord or procuring an external managing agent - were discounted due to limited in-house expertise, resource pressures, and financial disadvantages. By selecting a Registered Provider with specialist experience, the council will secure a well-run, sustainable service that meets the needs of vulnerable residents, maximises funding opportunities, and supports the city's commitment to inclusive, high-quality care and accommodation.



# Brighton & Hove City Council

## Cabinet

## Agenda Item 111

**Subject:** Biodiversity Habitat Bank Pilot  
at St Michael's Field

**Date of meeting:** Thursday 22 January 2026

**Report of:** Cabinet Member for Net Zero & Environmental Services

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

**Contact Officer:** Name: James Woodward  
Email: james.woodward@brighton-hove.gov.uk

**Ward(s) affected:** Patcham & Hollingbury

**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 seeks approval to register St Michael's Field as a Habitat Bank for the purpose of selling Biodiversity Net Gain (BNG) units and Voluntary Biodiversity (VB) credits to developers and corporates.
- 1.2 The Habitat Bank will support Brighton & Hove City Council (BHCC) in the delivery of Council Plan 2023-2027 outcomes linked to biodiversity including Outcome 1 'A city to be proud of' and Outcome 3 'A healthy city that helps people to thrive'. It will also enable BHCC to deliver against the City Downland Estate Plan objective 'Enabling biodiversity to flourish'.
- 1.3 This project will also support delivering of Outcome 4 'A responsive and learning council with well-run services' through the creation of council savings that will deliver an innovative approach to biodiversity.
- 1.4 The habitat bank will support the council's ambitions to conduct focussed, strategic nature recovery work at scale, as well as its statutory [biodiversity duty](#) to conserve and enhance biodiversity.

#### 2. Recommendations

- 2.1 Cabinet agrees to register St Michael's Field as a Habitat Bank and enter the necessary legal agreement for the registration of the site.
- 2.2 Cabinet delegates authority to the Corporate Director for Finance & Property and the Corporate Director for City Operations for key decisions on registration and sale of biodiversity units and credits.

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

- 3.1 Biodiversity Net Gain (BNG) is a legal requirement under the Environment Act 2021 and the Town and Country Planning Act 1990, as amended by subsequent regulations. Most planning permission (above a certain size) in England are now subject to a condition requiring a biodiversity gain plan to be submitted and approved before development commences, with the plan demonstrating at least a 10% net gain in biodiversity value compared to the pre-development baseline. If developers cannot deliver biodiversity benefits on-site, they must compensate for the loss of habitat by purchasing off-site biodiversity units (BNG units) that will deliver a like-for-like habitat type. BNG units are provided to the market to create a 10% biodiversity gain and pay for the delivery of this outcome over a 30-year period. Units are a standardised measurement of habitat value used to ensure developments leave nature in a measurably better state.
- 3.2 Habitat Bank units can alternatively be sold as Voluntary Biodiversity credits. The Voluntary Biodiversity (VB) market is used by businesses, charities and others to deliver against Environmental, Social and Governance goals. The credit market is separate to the Biodiversity Net Gain unit market but operates in the same way. To sell credits, the council will use an external platform such as the South Downs National Park Authority ReNature scheme to integrate the sale of units and credits for the purpose of not double counting.
- 3.3 When developers purchase off-site units, they are financially encouraged to do so within the same Local Planning Authority or National Character area. A spatial risk multiplier is added to the number of units required to be purchased outside of these areas, resulting in an increased cost to the developer.
- 3.4 A habitat bank is proposed to be set up at St Michael's Field, Patcham (BN1 8RL). The site is on the western boundary of St Michael's Way Traveller Site. This habitat bank will provide pre-defined units of other neutral grassland, scrub and hedgerow habitats.
- 3.5 As the landowner of the proposed habitat bank, Brighton & Hove City Council will be obliged to deliver the habitat bank for 30 years under the legal agreement. The site will generate 44 units and the sale of units and credits will generate the income needed to achieve this.
- 3.6 The council is expecting to carry out its own developments in the future and St Michael's Field as a habitat bank can provide the biodiversity units that are expected to be required. The habitat bank can also provide units for private developments in Brighton & Hove and the surrounding areas. This could include the Royal Mail's redevelopment of Patcham Court Farm.
- 3.7 The sale of units and credits will create a new income stream for the council and will help the council to deliver on its biodiversity objectives and duties. This income will be used to cover the costs relating to the physical

management of the site and the relevant staff costs and overheads, delivering savings to the council's revenue budget.

- 3.8 As a pilot, this project will enable the council to test and learn its approach to delivering habitat banks and selling units. It will provide the important learning that is needed to bring forward new sites in the future. It will also give the council crucial insight into different and innovative ways to generate income for environmental delivery.
- 3.9 The selection of St Michael's Field as a council habitat bank aligns directly with measures to help restore nature as specified in the draft East Sussex and Brighton & Hove Local Nature Recovery Strategy, to be published Spring 2026.
- 3.10 St Michael's Field was selected as the viable and preferred site for this pilot through an appraisal done by SWT Ecology Services in 2023/24. The council worked with the consultant to identify and assess 24 different sites within the City Downland Estate. This site was the preferred site as it met the criteria of being vacant, having a low ecological baseline, being able to generate a significant number of units, being a cost-effective and beneficial site, and providing a diversity of habitat types.
- 3.11 Other council-owned land, including parks and opens spaces, were assessed and deemed unsuitable for habitat banking due to recreational pressures, limited opportunity for ecological uplift, not being cost-beneficial, or having an existing environmental management scheme in place.
- 3.12 The next steps for this scheme would be to:
- enter into a Section 106 legal agreement with the Responsible Body (South Downs National Park Authority);
  - register the site with Natural England;
  - set up the financial governance of income and expenditure;
  - include the contribution towards relevant staff time in the council's Medium-Term Financial Strategy (MTFS);
  - commence the establishment of the prescribed habitat management; and
  - begin to sell biodiversity units and credits.

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

- 4.1 The main reasons for the recommendation have been set out in the previous section. The key considerations are the potential to create a new income stream, deliver biodiversity objectives and duties, test and learn the council's approach to innovative environmental schemes, and receive new income that can help the council achieve cost savings over the next 30 years. It also retains BNG money within the city, rather than it going outside to other habitat bank providers.
- 4.2 The field could be put into the Patcham Court Farm agricultural tenancy which the council leases to one of its tenant farmers for the annual sum of £917. This is not recommended as the contribution to council costs is significantly smaller than via the habitat bank and it does not achieve the

additional biodiversity aims in the City Downland Estate Plan and Council Plan.

- 4.3 A second option is to commission another ecological desk study appraisal to evaluate if there is an alternative site. However, initial screening of other sites within the City Downland Estate and Cityparks suggests they are not viable. This study would cost approximately £8,000 to £10,000 as Estates and Net Zero would need to commission an ecological consultant. This is not recommended as it is considered that sufficient information already exists to confirm the suitability of St Michael's Field for this habitat bank pilot.
- 4.4 The land could be sold. The average price for agricultural pasture is £6,500 per acre. The total value of the parcel based on acreage would be approximately £136,500. However, the land is statutory open access and this designation would likely decrease that value. This is not recommended because it would not likely present value for money. However, the council would require advice from a rural land agency to determine this.
- 4.5 The land could be put into a different environmental scheme such as Countryside Stewardship Higher Tier (funded from central government). The council currently manage Local Nature Reserves using this scheme. It is a short-term scheme that lasts 5 years. At the end of the 5-year cycle, the council could reapply for the same scheme. It is estimated that the council could generate £5,525 per year to pay for environmental management through this scheme. This is not recommended because the income value would cover less council savings.
- 4.6 Alternative options would significantly delay the potential for the council to sell biodiversity units and credits, and test and learn our approach to accessing and using innovative forms of green finance. This would lead to BNG money going outside of the city and would likely lead to lost opportunities with council developments, private developments, and corporates. This will also impact the council's ability to deliver on biodiversity objectives and duties at a greater scale as well as generate income to contribute towards council savings.

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

- 5.1 Consultation has taken place with the Downland Advisory Panel. The feedback was positive on the principle to use this land as a habitat bank. Feedback from one stakeholder has requested some detailed changes to the Habitat Management & Monitoring Plan (HMMP) in terms of the design of the habitat. This feedback will be taken into consideration when the HMMP is finalised after the Cabinet decision is made.
- 5.2 The neighbouring farm business and tenant of BHCC has been consulted due to the connection with the adjacent land. They have responded positively and shown support for the creation of the habitat bank.

- 5.3 The neighbouring Traveller community of St Michael's Way Traveller Site have also been consulted through the Communities Team. They neighbour the site on the eastern boundary. They have been supportive of the project.
- 5.4 Ward Councillors have been briefed and consulted on this project.

## **6. Financial implications**

- 6.1 St Michaels Field is currently vacant but was previously generating £1000 pa in rent. The proposed habitat bank is expected to generate a much greater financial return and meet the council's and City Downland Estate Plan objectives whilst providing an option for the council to meet planning Biodiversity Net Gain requirements for its own developments or other developments in the city.
- 6.2 The proposal is a pilot and the financial case is based on the 30 year management requirement for the site and includes the full range of anticipated costs.
- 6.3 The initial costs of registering the site, S106 costs and hedgerow planting is £50,000. There will be ongoing management costs over the 30 year period provided by council teams in the Ranger and biodiversity service helping to offset the cost of the services and deliver savings for the council. Other costs included are periodic such as planting and fencing repairs alongside a contingency for any additional costs.
- 6.4 The income generated through the sale of units and credits will be used to fund the expected costs over the 30-year period by being held in an interest-bearing reserve and drawn down as required. The income estimates have been informed by market research conducted to understand the income potential of selling units and credits, and the costs of delivery over the 30-year period. This has included the BNG Report Pricing & Key Insights October 2025 and meeting with sellers of units (Plymouth City Council, Doncaster City Council, Surrey Wildlife Trust and Knight Frank). Biodiversity Net Gain is a dynamic market which is emerging from the new legislation that came into force in February 2024. At present, the demand for units has not caught up with the current supply. This has pushed down the sale price of units; however, demand is forecast to increase as more development is brought forward linked to national and local housing and development targets. This is expected to increase the sale price. The expected costs will be covered by the sale of all units at the lower estimates. All income must be spent on delivering the habitat bank and cannot be used for other purposes; therefore, any excess from selling units at a higher price will be invested in the habitat bank. The financial risks relating to the proposal include initial and ongoing costs being higher than projected, the sale of units being at a lower value and how quickly the sale income is received. The cost risks have been mitigated through the research undertaken. Income risk will be lead by market forces however the lower cost of units within the boundary and limited scope for BNG options within the city for developers makes this proposal attractive. The city council will also have developments that



potentially require off site units such as potentially King Alfred Leisure Centre and this will therefore provide an option.

Name of finance officer consulted: James Hengeveld Date consulted: 11/12/25

## **7. Legal implications**

- 7.1 The council as landowner will need to register the site on the Natural England Biodiversity Net Gain Register in order to commence the sale of the units. To do this, the council will need to enter into a section 106 planning agreement with the South Downs National Park Authority as the Responsible Body for monitoring the site, as set out in the Biodiversity Net Gain regulations of the Environment Act 2021. This agreement will tie the council into delivering the habitat bank and habitat conditions, as set out in the Habitat Management & Monitoring Plan (HMMP), for a period of 30 years from the day that the agreement is signed.

Name of lawyer consulted: Katie Kam Date consulted: 12/12/2025

## **8. Risk implications**

- 8.1 The main risk is the possibility that BHCC will not be able to sell all the units registered for the site. This could leave a financial shortfall for delivering the habitat bank, which would have to be covered from a different source of money. This risk can be mitigated by diversifying into the voluntary credit market alongside BNG units. A pipeline of our own development projects that are expected to need to purchase BNG units has been identified, which could cover a significant part, though not all, of the available units.
- 8.2 The sale price of units could drop below £17,000. This could lead to a financial shortfall for delivering the habitat bank. Our market research and conversations with other sellers suggests that the sale prices are currently at their lowest. This is due to a current oversupply compared to demand. However, the UK government's house building targets and other developments should see the market grow and prices increase. Diversifying into the Voluntary Biodiversity credit market will help to mitigate this risk.
- 8.3 A financial risk assessment by the council's Finance Team suggests that there are delivery cost inflation risks due to the prescriptive manner of the HMMP and the complexities of the process to deliver the habitat bank. However, this risk has been addressed by factoring in an appropriate contingency into unit pricing.
- 8.4 The assessment also notes the practical risk of delivering the HMMP (i.e. not meeting the HMMP obligations and not managing to deliver a lasting 10% uplift in biodiversity on the site). This is being mitigated by choosing to pilot habitat types that are easier to deliver, as well as factoring in the financial contingency which can be used to intensify management if necessary to achieve delivery.

- 8.5 If the council decides to not approve this report, the council will miss out on the potential opportunity to sell units to the Royal Mail development, council developments, and the income that would provide to fund early delivery.
- 8.6 It will also risk the council's ability to deliver against some of its biodiversity and wider environmental objectives over the coming years. This includes our Statutory Biodiversity Duty, climate risks and the Local Nature Recovery Strategy.

## **9. Equalities implications**

- 9.1 The equality impacts of this policy have been considered through the Rights of Way Improvement Plan (RoWIP), City Downland Estate Plan (CDEP), and Local Nature Recovery Strategy (LNRS). These strategies have reviewed use of this land, who has access, who faces barriers to access, and who would benefit most from improved access. Equalities considerations significantly shaped these policies and all have defined outcomes to improve accessibility. This includes RoWIP aim 'improve accessibility for diverse users in Brighton & Hove, CDEP aim 'amenity for all' and LNRS core priority 'create new opportunities for access to nature in urban, peri-urban and rural areas to support health and wellbeing'.
- 9.2 This proposal may affect the experience of residents local to the site, including the community of St Michael's Way Traveller site. Engagement has taken place with these residents through our Communities Team to ensure there will not be any unexpected adverse impacts. This is in line with our Traveller Commissioning Strategy (2015) objectives on improving community cohesion.
- 9.3 This proposal may affect some visitors' experience, for example dogs will be required to be on the lead at certain times. However, this is already provided for in the Countryside Code and not a change of policy. Consideration of access will guide our procurement and management of gates to ensure they are high-quality and best practice in terms of accessibility and will be managed with adequate communication and engagement (as per CDEP "Amenity for All" objectives).
- 9.4 This proposal will improve accessibility by improving the quality of the environment of these spaces and offer additional interpretation. This will support delivery of CDEP action 'Amenity for all' and Local Nature Recovery Strategy (LNRS) objectives linked to 'Nature, health and wellbeing'. It is known from CDEP and LNRS consultations that access to nature provides health and wellbeing benefits to all visitors, but particularly to those who face health and poverty-related barriers.

## **10. Sustainability implications**

- 10.1 The creation and management of the habitat will require some energy use including vehicles and machinery. It is unlikely that this will generate significant energy requirements and would be less than, or similar to, current

agricultural management. Creating new habitats on the site is a positive for sustainability.

- 10.2 The site is accessible from Patcham via a road bridge over the A27, and due to the minimal amount of local parking off Saint Gabriel's Lane, it is not expected to significantly increase private travel.
- 10.3 A significant proportion of establishing and managing the habitat bank will be carried out by internal services, such as the Ranger team. The council can also work collaboratively with the neighbouring farmer (a tenant of the council) to deliver services that the Ranger cannot. If contractors need to be procured, the council will follow its procurement policies to ensure that sustainable choices are made.
- 10.4 To create and manage the habitat, the council will need to contract a local farmer to graze the site with grazing animals (e.g. local cows, sheep or ponies). This will be essential in creating a biodiverse habitat. Cows will require access to water, but this will be less than water use for intensive agricultural management. It is proposed that as far as possible the council works with existing tenant farmers who already have these grazing animals within their farming business. Therefore, there is no additional methane emissions and water use.

## **11. Health and Wellbeing Implications:**

- 11.1 This project will create a nature-rich site on the urban fringe of the city near Patcham. The site is accessible via a bridge over the A27. The field is designated as open access, meaning people can roam freely across it. This project will increase the local community's access to nature and the bring mental health and wellbeing benefits that come with that.

## **12. Procurement implications**

- 12.1 The management and delivery of the habitat bank will be achieved using BHCC's Biodiversity Officer and team of Rangers, alongside contractors where needed. This could include contracting the neighbouring farmer to carry out some management activities that BHCC cannot do, as well as commissioning local consultant ecologists to do periodic ecology surveys and habitat assessments when needed. Contractors will be procured in line with BHCC's procurement policies and procedures. These contracts are expected to be small in value below the £10,000 threshold. The only foreseeable cost above that threshold is paying the S106 monitoring fee to the South Downs National Park Authority (SDNPA) who will carry out monitoring of the habitat bank over the 30-year period.

## **13. Crime & disorder implications:**

- 13.1 There is the potential for anti-social behaviour on the site. Littering, alcohol and drug abuse can occur on local nature reserves and green spaces on the urban fringe. This will be mitigated by the regular presence of BHCC Rangers and contractors on the site. Where anti-social issues regularly

occur, this will be reported to the Sussex Rural Police helpdesk. Periodic litter picking will be carried out by the Ranger team with volunteers to keep on top of the specific issue.

- 13.2 It can be a common occurrence to experience issues with dog attacks on grazing animals (especially sheep), or for dog walkers to not meet the rules in the Countryside Rights of Way Act. Due to the site employing cow grazing primarily, this will help mitigate against sheep attacks. If this becomes an ongoing issue, the Estates and Net Zero teams will consider doing communications and engagement with the dog walking community.

## **14. Conclusion**

- 14.1 This report is seeking Cabinet approval for the registration of St Michael's Field as a habitat bank for the purpose of selling biodiversity units and credits, along with the necessary legal agreement and delegated authority.
- 14.2 This pilot scheme will allow BHCC to test and learn its approach to generating income in an innovative way for delivering biodiversity objectives and duties set out in the Council Plan and City Downland Estate Plan.
- 14.3 The income from this scheme will also provide cost saving measures for the over the 30-year period of delivery. However, there are some financial risks associated with the Biodiversity Net Gain and Voluntary Biodiversity markets. The main risks are that the sale price of units could potentially decrease and the costs of delivery could increase. However, mitigation has been factored in, including a contingency and diversification in the credit market.

## **Supporting Documentation**

### **1. Appendices**

- 1. Appendix 1 – Equalities Impact Assessment
- 2. [BNG Report Pricing & Key Insights October 2025](#)



## EQUALITY IMPACT ASSESSMENT SCREENING/EVIDENCE TEMPLATE

<b>Business area</b>	Net Zero
<b>Team/Unit</b>	Biodiversity
<b>Date</b>	07/10/25

Name of Policy/Guidance/Operational activity	
Biodiversity Net Gain (BNG) Habitat Banks - Pilot Scheme	
What are the aims, objectives & projected outcomes?	
<p>This assessment reviews the impact of our proposal to pilot and roll out the development of Habitat Bank sites in Brighton and Hove.</p> <p>Habitat banks use land to restore habitats which are required for off-site development units, so that the developer can meet planning obligations by achieving the required 10% biodiversity gains. Our objective is to pilot the creation and maintenance of a Habitat Banks at St Micheal's Field, Patcham, with a view to register further sites in the future.</p> <p>The aim of the policy is to deliver reliable and long-term financing for biodiversity improvements in the city, in line with the Environment Act (2021). The policy will also support the delivery of City Plan Part 1 and 2 policies, our draft Local Nature Recovery Strategy, our City Downland Estate Plan and Open Spaces Strategy, and Public Rights of Way Plan.</p> <p>The outcomes of this policy include:</p> <ul style="list-style-type: none"> <li>- Improved Biodiversity within the City</li> <li>- Improved access to nature through improved biodiversity and interpretation</li> <li>- Delivery of our enhanced Biodiversity Duty</li> <li>- Long term financing for improving and maintaining nature</li> </ul>	
This is a <b>new</b> policy/guidance/operational activity.	<b>Y/N</b>
This is a <b>change</b> to an existing policy/guidance/operational activity (Check original policy was equality impact assessed. If so, review and update action plan).	<b>Y/N</b>
This is an <b>existing</b> policy/guidance/operational activity.	<b>Y/N</b>
Will the policy/guidance have an impact on national or local people/staff?	<b>Y/N</b>
Are particular communities or groups likely to have different needs, experiences and/or attitudes in relation to the policy/guidance?	<b>Y/N</b>
Are there any aspects of the policy/guidance that could contribute to equality or inequality?	<b>Y/N</b>
Could the aims of the policy/guidance be in conflict with equal opportunity, elimination of discrimination or fostering good relations?	<b>Y/N</b>

If your answer to any of these questions is **YES**, go on to the full **EIA**. **Or** Where you are satisfied that the requirement to have due regard has already been met through the policy development process, give details of the findings/outcomes and provide the evidence below.

If you have answered **NO** to all of these questions, then please provide appropriate evidence and sign-off.

**This policy/guidance was screened for impact on equality. The following evidence has been considered.**

The equality impacts of the delivery of this policy has been considered through the Public Rights of Way Plan (PRoW 2018), City Downland Estate Plan (CDEP 2021) and Local Nature Recovery Strategy (LNRS due 2026). Together these strategies have reviewed who uses this land, who currently has access, who faces barriers to access, and who would benefit most from improved access to nature. Equalities considerations significantly shaped these policies, and all have defined outcomes to improve accessibility, including PRoW's "Aim: improving accessibility for diverse users in Brighton & Hove", CDEP's "Amenity for All", and LNRS's core "Priority: Create new opportunities for access to nature in urban, periurban and rural areas to support health and wellbeing."


Currently, St Michael's Field pilot site is designated Public Access, accessible by the general public. Users of Public Access spaces are 95% walkers (often dog walkers), 19% cyclists and 6% horse riders. 4% of PRoW survey responders said they don't access for health reasons and 2.5% because of poor surfacing.

Our proposal may affect some visitors' experience, for example dogs will be required to be on the lead at certain times. However this is already provided for in the Countryside Code and not a change of policy. Consideration of access will guide our procurement and management of any gates to ensure they are high-quality and best practice in terms of accessibility, and will be managed with adequate communication and engagement (as per CDEP "Amenity for All" objectives).

Our proposal may also affect the experience of residents local to the sites, including the community of St Michael's Way Traveller site. We have engaged with these residents through our Communities Team to ensure there will not be any unexpected adverse impacts. This is in line with our Traveller Commissioning Strategy (2015) objectives on improving community cohesion.

Our proposal will improve accessibility by improving the quality of the environment of these spaces, and offer additional interpretation - and this will support delivery of the "Amenity for all" objectives of the CDEP, and the "Nature, health and wellbeing" objectives of the LNRS. We know from our CDEP and LNRS consultations that access to nature provides health and wellbeing benefits to all visitors, but particularly to those who face health and poverty-related barriers.

**I have read the preliminary screening and I am satisfied that given the available evidence, a full Equality Impact Assessment is not required.**

<b>SCS or senior manager signoff</b>	Alice Berry. Head of Net zero 
<b>Date</b>	12/12/25
<b>Review Date (where applicable)</b>	NA







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