

Cabinet

Date: **14 May 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**
Democratic Services Officer
01273 291058
john.peel@brighton-hove.gov.uk

Agendas and minutes are published on the council's website www.brighton-hove.gov.uk. Agendas are available to view five working days prior to the meeting date.

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

This agenda and all accompanying reports are printed on recycled paper



Chief Executive
Hove Town Hall
Norton Road
Hove BN3 3BQ

Date of Publication - Wednesday, 6 May 2026

AGENDA

Part One

Page

175 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

176 MINUTES

7 - 30

To consider the minutes of the meeting held on 23 April 2026

177 CHAIR'S COMMUNICATIONS

178 CALL OVER

179 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 8 May 2026
- (c) **Deputations:**
To receive any deputations submitted by the due date of 10am on the 5 May 2026

180 ISSUES RAISED BY MEMBERS

To consider the following matters raised by Members:

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

181 MATTERS REFERRED TO THE EXECUTIVE

182 REPRESENTATIONS FROM OPPOSITION MEMBERS

183 CITY PLAN - FORMAL COMMENCEMENT OF PLAN MAKING 31 - 44

Contact Officer: Steve Tremlett
Ward Affected: All Wards

184 IMPROVING ELECTRIC CHARGING INFRASTRUCTURE 45 - 114

Contact Officer: Kieran Fitsall
Ward Affected: All Wards

185 INVESTING IN SUBSIDISED BUS TRAVEL 115 - 118

Contact Officer: Paul Nicholls
Ward Affected: All Wards

186 WORKING TOWARDS CLEANER AIR FOR BRIGHTON & HOVE THROUGH IMPROVED SMOKE CONTROL AREAS 119 - 146

Contact Officer: Samuel Rouse
Ward Affected: All Wards

187 COUNCIL HOUSING ASSET MANAGEMENT PLAN 147 - 190

Contact Officer: Martin Reid
Ward Affected: All Wards

188 HOUSING SAFETY AND QUALITY: OUR IMPROVEMENT JOURNEY - PROGRESS UPDATE 191 - 240

Contact Officer: Martin Reid
Ward Affected: All Wards

PART TWO

189 INVESTING IN SUBSIDISED BUS TRAVEL (EXEMPT CATEGORY 3) 241 - 242

Contact Officer: Paul Nicholls
Ward Affected: All Wards

190 PART TWO MINUTES OF THE PREVIOUS MEETING 243 - 244

To consider the Part Two minutes of the meeting held on 23 April 2026

191 PART TWO PROCEEDINGS

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

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

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

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

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

Further information

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

Webcasting notice

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

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

Access notice

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

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

Meeting Accessibility

To ensure that our meetings remain safe and accessible there are a number of measures that are in place. Please take note of them before and during your attendance at one of our meetings that are held in public:

- Visitors are admitted on condition that they allow themselves and their belongings to be searched.
- You will be asked to sign in upon arrival and may be asked to show proof of identity.

The following items are not permitted at any of our meetings which are held in public:

- Sharp items e.g. knives (including Swiss army knives) scissors, cutlery and screwdrivers;
- Paint spray or similar items;
- Padlocks, chains and climbing gear;

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

Please restrict the size of bags brought to meetings as there are no facilities for storage of bags or other personal items – all bags will be searched upon entry. You may also be subject to secondary searches once inside the meeting.

Conduct at meetings

Councillors must be able to make themselves heard on behalf of those they represent.

The Mayor or the Chair will not allow behaviour that disrupts council business.

Under the Council's Constitution, Part 3A, Council Procedure Rules 16.2 -16.3, at any meeting of the Council, the Mayor/Chair has the power to order the removal of any member of the public who:

- interrupts the proceedings
- acts in a way that impacts the proper and orderly conduct of the meeting

In the interest of order during a meeting, the Mayor/Chair may suspend or adjourn a meeting for any length of time they decide.

You must follow the Mayor's/Chairs 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.

Fire & emergency evacuation procedure

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

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

BRIGHTON & HOVE CITY COUNCIL

CABINET

2.00pm 23 APRIL 2026

COUNCIL CHAMBER, HOVE TOWN HALL

MINUTES

Present: Councillor Sankey (Chair) Taylor (Deputy Chair), Alexander, Allen, Daniel, Miller, Muten, Robins, Rowkins and Williams

PART ONE

159 PROCEDURAL BUSINESS

159a Declarations of interests

136.1 There were none.

159b Exclusion of the press and public

159.2 In accordance with Section 100A of the Local Government Act 1972 ("the Act"), the Committee considered whether the public should be excluded from the meeting during consideration of any item of business on the grounds that it is likely in view of the business to be transacted or the nature of the proceedings, that if members of the public were present during it, there would be disclosure to them of confidential information as defined in Section 100A (3) of the Act.

160 MINUTES

160.1 **Resolved-** That the minutes of the previous meeting be approved as the correct record.

161 CHAIR'S COMMUNICATIONS

161.1 The Chair provided the following Communications:

Since we last met as a Cabinet, we have continued to focus on what matters most in this city, delivering better outcomes for the people of Brighton and Hove, using our resources well, and working with partners to shape a stronger, fairer and more sustainable city. Just in the last month, among many other things, we've opened the Weller Youth Centre in Hangleton, we've opened the first covered paddle courts in the city, up at Withdean. We have launched our first EV double-decker bus fleet, along with our partners at Brighton and Hove Buses, with 16 new electric buses, electrifying the number 7 route. And we have reopened a refurbished public toilet at Victoria Park in Portslade.

We've been on site at the former Sackville Road Trading Estate, where thanks to past decisions of this Cabinet, we are delivering 306 affordable new homes, including council homes, one, two, three and four bed properties. And last week I had my leader surgery in beautiful Moulsecoomb & Bevendean with Ward Councillors Evans and Taylor, meeting residents and having a look at our other big construction site currently, the building of Moulsecoomb Hub which is delivering hundreds more council and affordable homes as well as new community facilities. This month we have also established the Sussex and Brighton Mayoral Authority, a really historic milestone for our city, following in the footsteps of successful and growing cities like London, Manchester and Liverpool, giving us access to millions of pounds more of funding from central government, which will start straight away, and crucially putting power back into local hands. We've secured more than 9 million pounds of additional government funding to support council housing and temporary accommodation in the city, which is a really significant step for us in responding to housing pressures and improving things for our residents that need housing support. And we've settled 11 more residents into women's-only council-owned temporary accommodation, something that our Labour Council has spearheaded after listening to women's experiences.

Today we'll be discussing a new private sector housing enforcement policy to strengthen this council's ability to act against poor housing conditions in the city and rogue landlords preventing illegal evictions and ensuring that every resident in our city has a safe and decent place to live. We're proud of our Labour government's Renters Rights Act which is very soon to come into force. Nowhere in this country is that Act more important, where the proportion of people privately renting is one of the highest in Brighton & Hove anywhere in the UK and which has risen in the past 10 years. Housing remains one of our most pressing challenges and one of the priorities of this Labour Council, which is why today we are bringing forward the Temporary Accommodation Transformation programme report where we will consider making a decisive shift towards housing sustainability, reducing reliance on costly short-term provision and trying to improve outcomes for our residents who need secure long-term homes. I recognise that the use of 20% of council stock for temporary accommodation over the next year

will have an impact on households that are on our housing register, which is why we've listened carefully to the feedback from the consultation and sought to strike a fair balance to all those currently in an inadequate accommodation, and which is why the house building that I referred to earlier on is so urgent.

Taken together with our asset strategy, which we're also considering today, which sets out how we will manage the council's property portfolio in the months to come. We are supporting more housing delivery, ensuring that our assets are working harder for our residents and for our city's future.

Today, we'll also be discussing and deciding whether to move ahead with an e-scooter trial for Brighton and Hove, potentially another practical step towards cleaner, more accessible travel choices that support our climate goals while keeping safety and public confidence at the forefront of our decision making. This trial can ensure that we approach e-scooters in a sensible, regulated and managed way, while seeking to improve air quality across the city, reduce congestion and enable residents to move around more easily and more quickly. We are a forward-looking city and we must always look to embrace new modes of transport that meet our residents' objectives.

From sustainable transport to community wellbeing, also on the agenda is one of my favourite projects, the King Alfred Leisure Centre regeneration, which represents a major strategic opportunity for the west of the city, delivering public value through

modern leisure facilities, improved health and wellbeing support and wider regeneration benefits. I couldn't be prouder of the pace we are now working at to deliver this project and in fact, the report that we're bringing today is evidence that we are moving ahead of schedule because we know that under the years of no overall control, under the Green and Tory-led minority administrations, this project for King Alfred ran aground and got buried in the long grass. We won't be distracted in our mission to deliver a new leisure centre in the west of the city and we certainly won't be distracted by campaigns that twist the truth by political actors that don't rely on having high quality public leisure facilities available.

Reflecting on these five significant reports that we are now due to discuss, I will say this. No one can ever accuse this Labour Council that I lead of not taking action on the most pressing and urgent issues that our city faces.

We aim to move fast and fix things, improve lives and get better outcomes for our residents. Other parties moan and object to progress or clutch their pearls and say that the council should sit on its asset for sentimentality's sake. We say no. We are here and our public assets are here, to serve the people of this city and serve them, we will.

162 CALL OVER

162.1 All items on the agenda were reserved for discussion.

163 PUBLIC INVOLVEMENT

(b) Public Questions

1) The King Alfred Leisure Centre Regeneration Project

163.1 On behalf of Diane Montgomery, Carol Wilson read the following question:

After detailed review, it appears that the current proposal conflicts with the City Plan, the Sports Facilities Investment Plan, the Stakeholder Engagement Report, and the Urban Design Framework.

Given this, will the Council grant permission for a full independent structural inspection of the existing building to be undertaken, and agree to pause any demolition, funding, or enabling works prior to the grant of planning permission and until the findings are completed and published?

We would be willing to fund or facilitate this independently, subject to access being granted. This would ensure that any final decision is based on a complete and transparent evidence base.

163.2 Councillor Robins provided the following reply:

Thank you very much and thanks for the question. To be clear, the King Alfred project does not conflict with the City Plan Sports Facility Investment Plan or any other documents cited. As explained at previous Cabinet meetings, the condition survey of the existing facility has been completed, as well as a wider assessment of the suitability of the existing facility to meet current and future needs.

All of that work informed the Green Book business case, the key findings of which were summarised in the July 2024 Cabinet paper. The business case, the condition and condition survey were examined in detail by the cross-party scrutiny committee who

agreed with the paper's recommendation that refurbishment was neither practical nor represented a viable investment option.

That is explained in the Cabinet papers, with details provided in Appendix One of that paper.

2) **Asset Strategy**

163.3 Malcolm Spencer read the following question:

Section 3.21 states that the land is to be sold for residential development and section 3.20 states that there are issues with access. In light of the ongoing issues with planning application BH2025/01597 (the non council owned part of the site) where it is being argued that access to this site does not meet the National Planning Framework requirements for safe accessibility for all, how can the council justify a proposal to create a situation where more people will need to access this site?

163.4 Councillor Taylor provided the following reply:

Thank you, Malcolm, for your question, for coming in. And from one Ovingdeanian to another, as I grew up in Ovingdean and know very well, although I no longer live there. I just wanted to take you through the response to your question. First of all, I won't comment on a live planning application, because that's tricky to do and I'm not on Planning Committee, and that's for that to be worked through, although, as you say and imply, access and accessibility are an important part of the overall planning framework and the consideration of any individual site. We should say that this site is allocated in the City Plan for residential development.

In terms of what this report is doing, it is, as you say, recommending for the council as landowner to dispose to try and enable residential development. However, the next stages of that and the working through of any proposal and then any planning application will be for the person that acquires the site, not for the council themselves.

And how they address that, all the different planning issues and considerations, including access, will obviously go through the full planning process and that's where they will be aired out.

So, I get the thrust of your question, but really, they are sort of two distinct processes. There's us choosing to dispose of it because of all the reasons set out in the report and because it is allocated for residential development. And then there's any future residential development, which will go through the separate planning process.

164 **ISSUES RAISED BY MEMBERS**

164.1 A copy of the questions received was circulated ahead of the meeting. Responses provided both at the meeting and in writing are as follows:

1) **Councillor Meadows - E-scooter trial consultation report**

Does the e-scooter trial run until May 2028 or 30 September 2029? There are different dates in paragraphs 2.3 and 3.3.

Response: Cllr Muten

Thank you for your question, Cllr Meadows.

The trial would ideally run until the end of the proposed contract extension for the operator, which is 30 September 2029. The legal basis for the trials are Vehicle special orders granted under section 44 of the Road Traffic Act. However, the government is planning to bring forward new legislation to regulate new forms of so-called 'Low-speed zero emission vehicles'. If this new bill is included in the King's speech next month, legislation to regulate e-scooters, e-bikes and e-mopeds could become law by May 2028. The Dept. for Transport wants ministers at the time to be able to decide whether a further extension to e-scooter trials is needed or not. If the new regulations are in force by May 2028, it is still possible that Beryl's contract to provide e-scooters could continue until the end of September 2029, otherwise, the expected end of the proposed trial is May 2028.

2) **Councillor McNair - E-scooter trial consultation report**

How can trialling e-scooters align with the council's aim of 'a fair and inclusive city where people feel safe and welcome' when this council is encouraging more e-scooters to terrorise the elderly and infirm by in effect encouraging e-scooters which will inevitably be ridden on pavements?

Response: Cllr Muten

Firstly, may I call out and express concern about the divisive tone of your question and suggest such association with terrorism is completely unacceptable. If any such behaviour is observed or reported, it should be immediately reported to Sussex Police. Riding of private e-scooters on highways including pathways in our city is illegal and will continue to be so under the proposed e-scooter trial. Again, any reports of their use should be reported to Sussex Police.

Our proposed highly regulated legal e-scooter trial proposes several safeguards in vehicle design and trial regulation to prevent excessive speed and pavement riding, two of the things vulnerable pedestrians tell us concern them the most. Each e-scooter will be fitted with geofenced technology which can be set up to prevent their use on pavements and in other defined 'no-go' zones. Timed and 24-hour 'No go zones' and 'go-slow zones' and nighttime curfews will further reduce potential hazard, and these measures have worked in other UK schemes. Furthermore, we will monitor and review these arrangements during the first six months of the trial with the safety of all.

3) **Councillor Meadows - E-scooter trial consultation report**

The part 2 of this report contains a full breakdown of costs and implications with the current provider. Why can't we as councillors and residents know the financial implications of this scheme?

Response: Cllr Muten

Thank you for your question, Cllr Meadows.

The detailed breakdown of costs and contractual implications is commercially sensitive and subject to confidentiality provisions within the existing contract. The inclusion of

scooters within the current Beryl scheme would significantly increase the projected financial return to the Council.

While Cabinet Members have full access to the detailed information in order to inform their decision, to publish this confidential commercially sensitive material would risk undermining the commercial relationship the Council has with the contractor and potentially lead to legal challenge.

4) Councillor Meadows - E-scooter trial consultation report

Is there a concern that due to the increasing cost of bus travel for young people, e-scooters will replace bus travel for many despite it being safer and possibly more environmentally friendly?

Response: Cllr Muten

Thank you for your question, Cllr Meadows.

The tariffs proposed are benchmarked against bus fares but there is no intention to compete for younger customers with the bus companies. Scooters are only available to people who hold a provisional or full drivers' licence. Scooter tariffs over longer distance will not be competitive with discounted passes and fares for students and young people. We are looking at ways to lower bus fares for young people and low-income households. We wish to encourage public transport and micromobility and active travel options and reduce car journeys as much as possible within Brighton & Hove.

5) Councillor McNair - E-scooter trial consultation report

Are these e-scooters made in the UK or shipped from overseas?

Response: Cllr Muten

Thank you, Cllr McNair, for your question.

The majority of scooter parts are shipped from overseas and assembled in the UK. The controller units are made in this country. The e-scooter has had a full lifecycle impact assessment undertaken which takes account of shipping emissions. The methodology is an accredited approach, assessed by 'BCorp' and Science Based Target Initiative.

6) Councillor McNair - E-scooter trial consultation report

Why is it a three-strike sanctions process instead of one-strike? Who is there to enforce the three-strike rule?

Response: Cllr Muten

Thank you for your question, Cllr McNair.

A three-strike rule gives riders a fair warning of the need to modify their behaviour and reduces the likelihood of malicious reporting impacting on individuals. The operator enforces the rules by sending warnings to the account holder identified through the licence plate and will suspend the account preventing future access if these are ignored.

7) Councillor McNair - E-scooter trial consultation report

Can the council guarantee Sussex police will be visible in stopping illegal or dangerous e-scooters? How else will the scheme be policed? Will there be regular meetings between the council and police to exchange updates on the scheme's progress?

Response: Cllr Muten

Thank you for your question, Cllr McNair.

The Council already works closely with Sussex Police's Roads Policing Unit and Neighbourhood Policing teams regarding the illegal or dangerous use of e-scooters. The police have been consulted from the beginning, and we will continue with regular meetings and updates during the trial. We will proactively share trial data to support the targeting of any additional guidance or enforcement activity needed, and the Council has already adjusted proposals to address important issues raised by the police. Any decision on enforcement activity is a matter for the Police, who will balance this against other road safety enforcement priorities which present greater harm, such as speeding, seatbelt compliance, phone use while driving and driving while intoxicated.

8) Councillor Meadows - E-scooter trial consultation report

Why aren't helmets being made mandatory?

Response: Cllr Muten

Thank you for your question, Cllr Meadows.

Helmets are not currently mandatory under the UK Highway Code. Working with our trusted partner Beryl, the proposed trial sets out to encourage and incentivise riders to wear helmets. There will be a particular focus on incentivising and promoting helmet use to the 18-24 age group, who are least likely to wear them. Through such good practice incentives and promotions, wider use of helmets for all those on two wheels may also take place.

9) Councillor Meadows - E-scooter trial consultation report

There were significant concerns about safety, insurance, and helmets among other issues. It may seem to some residents that this scheme was going to be rolled out no matter what the result of the consultation was. What reassurance can residents have that this scheme will be paused or stopped if concerns are realised and insurmountable?

Response: Cllr Muten

Thank you for your question, Cllr Meadows.

The Council has listened carefully to the concerns raised during the consultation and put additional measures in place where these are practical and possible. The trial will be closely monitored and adjusted if significant additional concerns are realised. None of the UK trials have been stopped due to safety concerns, though some have been paused or withdrawn for commercial reasons. If an insurmountable problem arises, we will of course suspend the trial.

Helmets are not a legal requirement but will be incentivised and promoted. Third party insurance is not a legal requirement either, but Beryl will signpost advice to riders on additional cover options from micro-mobility organisations. Beryl's own insurance requirements mean that the minimum age requirement will be 18+ , not 17+ as previously stated. The sign-up requirement of evidence of a provisional or full driver's licence remains.

10) Councillor Meadows - King Alfred Leisure Centre Regeneration Project

Paragraph 2.3 agrees to bring forward the allocation of £3.5m from previously agreed project capital budget to fund these works up to November 2026. How long will this funding last and how much more will the council need to borrow to complete just the King Alfred site?

Response: Cllr Robins

The £3.5million is part of the previously agreed budget of £65million and is not additional funding, and therefore no extra borrowing is anticipated. It represents the next instalment of funding to take the project up to November 2026, and as explained in the paper, will fund demolition and enabling works. We will come back to Cabinet in the Autumn to request the allocation of funding from the agreed budget to take the project forward beyond November 2026.

11) Councillor Meadows - King Alfred Leisure Centre Regeneration Project

Paragraph 3.1 reads: At its meeting on 25 September 2025, Cabinet approved recommendations to (i) agree to the design team progressing the King Alfred design proposals up to the submission of the planning application, (ii) agree the overall project budget of £65m, (iii) agree to increase the initial allocation to £5m for professional fees and surveys, and (iv) approve the demolition of the redundant parts of the site. What is the cost of the demolition? Is this part of the £5m? Where did the £5m funding come from?

Response: Cllr Muten

The £5m cited in the paper comprises the £2.7million agreed at the July 2024 cabinet meeting together with the £2.3million agreed at September 2025 cabinet meeting. The £5million was initially all designated for design work, surveys, and associated fees. However, because the project has progressed at an accelerated pace, some of the £5m has been used for the early enabling works including soft strip and asbestos removal works in the disused bowling alley. The main demolition and other enabling works, along with other fees and survey costs, will be funded from the £3.5million sought in this cabinet paper.

12) Councillor Meadows - Temporary Accommodation - Transformation for Financial Sustainability

Would the council agree that using council housing for temporary accommodation is unfair to those who are on the housing register waiting for a home? What will be done to ensure those with disabilities and other vulnerable future tenants will be able to get

their lives back on track too? Who will take priority? - those from outside the city or those already on the waiting list?

Response: Cllr Williams

We recognise the concerns of people waiting for social housing in the city and very real sense of frustration from people who have often been waiting a long time for a permanent home.

The council's proposed use of some council-owned homes as temporary accommodation is not a move away from our commitment to these households, but a time-limited response to acute homelessness pressures, that are particularly impacting families with children, and escalating costs of providing temporary accommodation. Over the extended period, we anticipate that no more than around 20% of council-owned homes becoming available for letting would be used as temporary accommodation at any one time.

Importantly, specific exemptions apply, including the exclusion of mobility-adapted and other specialist properties, to protect households with disabilities and more complex needs on the housing register.

Outside of this, decisions to allocate social homes will continue to be based on need, in line with the Allocations Policy.

13) Councillor Meadows - Temporary Accommodation - Transformation for Financial Sustainability

Paragraph 12.2 states that the assessment also identifies potential adverse impacts for some households on the housing register, including existing tenants seeking transfers, arising from the temporary reduction in the availability of settled council housing.

Why is the council happy to impact current protected groups on the waiting list and exacerbate their mental health?

Response: Cllr Williams

We recognise that reducing the availability of settled council housing, even on a temporary basis, can cause real anxiety and distress for households on the waiting list, particularly vulnerable households and existing tenants wishing to transfer. These impacts are explicitly identified in the Equality Impact Assessment and are taken seriously.

Cabinet is being asked to consider these impacts alongside clear evidence that the current temporary accommodation system is causing significant and, in many cases, greater harm.

Prolonged reliance on nightly paid accommodation has been shown to adversely affect mental health, family stability, children's education, and wellbeing, while also placing substantial financial pressure on the council that limits its ability to prevent homelessness and support vulnerable residents.

The extension of the use of council-owned homes as temporary accommodation is therefore proposed as a proportionate, time-limited intervention to reduce overall harm in a severely constrained and complex system.

It is tightly controlled through caps and exclusions for certain property types. This approach is intended to balance competing pressures responsibly.

14) Councillor Meadows - Temporary Accommodation - Transformation for Financial Sustainability

Paragraph 2.7 agrees to delegate authority to the Corporate Director of Homes and Adult Social Care, in consultation with Cabinet Member for Housing, to align rents for council owned properties owned or on long leases by the Council and used as TA with any future increases in Local Housing Allowance rates. What are the Local Housing allowances rates now and how do they compare to the government benefits paid for Temporary Accommodation?

Response: Cllr Williams

Local Housing Allowance sets the maximum Housing Benefit that can be claimed for accommodation and is based on factors such as household size and the Broad Rental Market Area. For most forms of temporary accommodation, different and generally lower rates apply than for settled private rented housing.

In Brighton & Hove this results in a consistent gap between what can be claimed for temporary accommodation and standard LHA rates. For example, the temporary accommodation LHA rate for shared accommodation is around £120 per week, compared with a standard LHA rate of £135, creating a shortfall of around £15 per week.

As property sizes increase, this gap widens significantly, rising from over £50 per week for one-bedroom homes to well over £100 per week for family-sized properties. This shortfall is a key contributor to the financial pressures associated with providing temporary accommodation and underpins the need for the approach set out in the report.

15) Councillor Meadows - Temporary Accommodation - Transformation for Financial Sustainability

What is the local Housing Allowance and how far will it go to plugging the gap on Temporary Accommodation?

Response: Cllr Williams

Local Housing Allowance does not, by itself, resolve the funding gap associated with temporary accommodation. As set out earlier, the lower LHA rates that apply to temporary accommodation create a structural shortfall between eligible Housing Benefit and the actual costs incurred, particularly for larger properties in a high-rent area such as Brighton & Hove.

The approach proposed in the report is therefore targeted and limited. It applies only to council-owned and long-term leased temporary accommodation, where the council has direct control over rent setting. By aligning rents with the appropriate standard LHA rate for these homes, the council can reduce avoidable Housing Benefit subsidy loss and improve cost recovery.

As detailed in the Cabinet report and supporting appendices, this measure is projected to generate additional income to the Housing Revenue Account of £0.425m in 2026/27 and a further £0.852m in 2027/28, based on the existing stock of 282 units. While this additional income improves financial sustainability, it is part of a wider package of measures rather than a standalone solution.

16) Councillor McNair - Private sector housing enforcement policy

Has the number of privately rented homes increased or decreased since 2010? Since 2023?

Response: Cllr Williams

Yes—the private rented sector in Brighton & Hove has increased substantially since 2011. At the 2011 Census, 29.6% of households rented privately; by the 2021 Census this had risen to 32.7% (around 40,000 households), well above the England average of about 20%. Council analysis in support of licensing schemes shows the trend continuing beyond the census, estimating the PRS at 35.8% of all dwellings in 2023 (around 48,200 homes), with particularly high concentrations in central wards where over half of homes are privately rented. Since 2023 overall size of the PRS may have broadly plateaued or begun to decline slightly, as due to some landlords exiting the market.

17) Councillor McNair - Private sector housing enforcement policy

Are the guidelines the same as apply to council owned property? How do policies differ if they do?

Response: Cllr Williams

The Private Rented Sector Enforcement Policy does not apply to council owned homes. This is because the council acts as a regulator in the private rented sector and as the landlord and service provider for its own homes, and crucially a council cannot enforce against itself so therefore the measures within the policy could not be applied to our own homes.

PRS enforcement policies therefore exist to secure compliance by independent landlords with minimum legal standards and rely on statutory powers such as inspections, enforcement notices, civil penalties and prosecution.

By contrast, council-owned homes are governed through management and service policies focused on repairs, planned maintenance, asset management and tenant engagement, with failures addressed through internal escalation, complaints processes and democratic scrutiny rather than legal enforcement. Oversight of council housing standards sits primarily with the Regulator of Social Housing (RSH), which sets consumer standards, monitors performance, and intervenes where there is systemic failure, reinforced by the Housing Ombudsman.

18) Councillor Meadows - Private sector housing enforcement policy

The council is unwilling to remove caravans despite court orders and safeguard concerns because of the cost involved in their removal. Why is the council willing to spend money on enforcement of privately rented homes but not caravans?

Response: Cllr Williams

Following a period of organisational change, a new Encampments Team was established in July 2025 to provide a more consistent and coordinated response to

occupied vehicles and tented encampments. This included the recruitment of an Encampments Co-ordinator and the development of refreshed processes, policies and procedures, initially within a limited budget envelope.

Since July 2025, work has focused on rebuilding capability, clarifying practice, and strengthening the legal, welfare and safeguarding framework within which this activity operates. Interim funding has been agreed by the Corporate Director of Families, Children and Wellbeing to address priority pressures and enable progress to continue while a longer-term, sustainable approach is brought forward to Cabinet for approval. This is complex and often longer-term work, as people living in encampments frequently have multiple and overlapping needs. The council's approach therefore seeks to balance proportionate enforcement with appropriate welfare support, recognising the risks of destitution and street homelessness that can arise following the clearance of encampments.

19) Councillor McNair - Private sector housing enforcement policy

There are residents in social housing in Patcham & Hollingbury that have freezing cold kitchens, poor or broken outside lights, damp and inadequate windows. Are the guidelines for social housing as strict as for private landlords?

Response: Cllr Williams

I am sorry to hear of the issues highlighted. The Repairs and Maintenance Service aim to do emergency repairs within 24 hours, and routine repairs within 28 days. Our records show 12 outstanding repairs relating to outside lighting in the Hollingbury and Patcham area. All have appointments booked, with the latest scheduled for 20 May 2026. If any residents have repairs outstanding beyond 28 days, and don't yet have an appointment then please do share their details with the Director for Homes and Investment who will follow this up.

Over the past two financial years, the Repairs and Maintenance Service has installed 34 new kitchens in the Hollingbury and Patcham wards, reflecting ongoing investment to improve the quality of our council housing stock. Tenants experiencing issues with damp or mould are strongly encouraged to report these at the earliest opportunity to the Repairs Helpdesk. The Repairs and Maintenance Service is committed to meeting the requirements of Awaab's Law, ensuring prompt investigation and resolution of damp and mould issues so that homes remain safe, healthy, and comfortable.

Following Covid, by June 2024 there were 9,653 open repairs that were over 28 days old, and earlier this year at Overview & Scrutiny we reported 2,641 open repairs of all ages. Additionally, the latest tenant satisfaction measures survey showed a 9 percentage point increase in satisfaction with the repairs service at 77%. The team continues to strive for improvements and in turn satisfaction.

So, whilst the policies differ for private and council tenancies the regulatory framework for social housing is stringent, reflecting the responsibility placed on social landlords to undertake repairs and safeguard tenants' health and wellbeing. For example, Awaab's Law places a legal duty on social landlords to investigate and remedy serious hazards, such as damp and mould, within defined statutory timescales once they are reported.

20) Councillor McNair – Asset Strategy

Could we be given precise details on what the key constraints are regarding ecology, open space and biodiversity net gain at Fawcett Fields (para 3.7) that means the site isn't suitable for an affordable housing scheme?

Response: Cllr Taylor

Any development would be required to comply with Biodiversity Net Gain (BNG) regulations, which mandate a minimum 10% measurable improvement in biodiversity, secured for at least 30 years. BNG can be delivered on-site, off-site, or, as a last resort, through the purchase of statutory biodiversity credits. In this case, it is not possible to provide replacement or enhanced habitat on-site, meaning compliance would rely on purchasing off-site biodiversity credits. Given current construction costs and the limited income generated from social rents, the additional cost of securing these credits makes it unviable to deliver a wholly affordable housing scheme.

21) Councillor McNair – Asset Strategy

When is Patcham Fawcett site likely to be made available to developers?

Response: Cllr Taylor

Following an approval to dispose by officer will procure an agent and agree a disposal strategy whilst completing due diligence in readiness for sale. It is hoped these tasks would be completed in a couple of months.

22) Councillor Meadows – Asset Strategy

Which school sites have been earmarked for development?

Response: Cllr Taylor

Cabinet has previously approved development of Homewood College (April 2025) and St Peter's Primary School (October 2025). The report presented to Cabinet April 2026 includes a recommendation for the development of Hertford Primary School.

23) Councillor Hill- E-scooter trial consultation report

In Appendix 3 titled 'Proposed Tariff & Promotions for scooter in BHCC trial', some of the shorter period promotions that are proposed seem either hard to implement or lack any detail. It does not say explicitly, looks to me like these promotions would include e-bike discounts to specific groups. For example, one short term promotion will give a discount to 'LGBTQ+ during week running up to pride weekend at end of July.' Another gives no detail and just says there will be a short-term promotion for 'BME groups'. I would feel uncomfortable getting a e-bike discount during the week before Pride due to being transgender. Can you explain how this would be implemented and why people might find this uncomfortable?

Response: Cllr Muten

Thank you, Councillor Hill, for your question and bring in something of your perspective and concern. The appendix outlines both the tariffs for the pay as you go, the pay as you ride scheme, and how to promote the wider use of e-scooters to everyone in our community. The only tariff reduction we are seeking to implement relate to care leavers, job seekers and those on Universal Credit. We are developing the detail of this targeted approach for those low-income households, reflecting our priority as administration. The e-scooter scheme is to be available and accessible to all, and we will work closely with our trusted partner Beryl and community representatives to develop this where appropriate. We have no plans for tariff reduction associated with protective characteristics. May I therefore apologise where the appendix to this report is slightly confusing on this matter and I wish to thank you for your question which has helped clarify this important point.

24) Councillor McLeay – Temporary Accommodation - Transformation for Sustainability

The EIA acknowledges that using Housing Revenue Account voids as Temporary Accommodation will directly affect council tenants and households on the housing register. What specific risk mitigation and exit plans are in place to prevent disproportionate harm to those already waiting longest for permanent social housing (particularly disabled households, families with children, and lone parents living in unsuitable accommodation), and how will Cabinet ensure that any negative cumulative impacts are being identified and addressed in real time, rather than retrospectively?

Response: Cllr Williams

The council recognises that using council-owned homes as temporary accommodation can affect households on the housing register, including those who have been waiting longest or who have additional needs. These impacts are explicitly identified in the Cabinet report and Equality Impact Assessment and, alongside consultation feedback, have informed the design of a carefully controlled approach. To mitigate risk, the policy includes clear safeguards. These include an overall cap on the number of homes that may be used, a defined and time-limited period, exclusions for specialist and mobility-adapted properties, and flexibility to increase or decrease use on a month-by-month basis, while not exceeding the total cap of 180 homes. By design, the policy is explicitly not intended to be permanent – it is very much an interim measure. It is designed to address immediate pressures arising from reliance on nightly paid accommodation, while longer-term measures are implemented, including the acquisition of additional council-owned temporary accommodation and the development of new models of provision. This sits alongside wider system interventions, such as strengthening homelessness prevention. Impacts are monitored in real time through weekly lettings meetings with senior officer oversight. This enables the council to pause, adjust or tighten use if impacts become disproportionate, rather than identifying issues retrospectively.

25) Councillor McLeay – Temporary Accommodation - Transformation for Sustainability

I note that the Hardship Fund is available only to in scope properties who are not in receipt of full Housing Benefit, a cohort estimated at around 10–20% of households. I also note the guidance that officers should not rely solely on self-referral and should proactively identify households at risk. Given the fund is allocated £203,000 per full financial year, what flexibility or contingency arrangements are in place should demand exceed the estimated 20%, and how will the council ensure vulnerable households are not excluded if need outstrips the allocated funding?

Response: Cllr Williams

The Hardship Fund is intended as a safeguard for households who may experience short-term affordability pressures as a result of the proposed rent changes, particularly those who are not in receipt of full Housing Benefit.

Demand for the fund will be kept under close review, and if take-up exceeds initial modelling the council will review the position to ensure that appropriate funding is available so that appropriate households are not left without support.

Officers are required to proactively identify households at risk and offer personalised advice and assistance, rather than relying solely on self-referral.

The Hardship Fund operates alongside wider safeguards, including welfare entitlement checks, Discretionary Housing Payments where appropriate, and housing management support.

Crucially, the ultimate safeguard remains the council's statutory duties under homelessness legislation. The council is legally required to provide suitable accommodation to homeless households, and suitability explicitly includes consideration of affordability.

Taken together, these measures ensure that households are protected, support is responsive to need, and no one is placed in accommodation that they cannot reasonably afford.

26) Councillor McLeay – Private Sector Housing Enforcement Policy

How will BHCC balance proactive inspections with reactive complaints to make sure enforcement action is not disproportionately complaint led - particularly where language barriers, disabilities, or insecure immigration status prevent tenants from coming forward?

Response: Cllr Williams

The council will continue to undertake targeted proactive action through our licensing schemes which don't rely on tenants coming forward to report issues. Inspections are risk based using a range of criteria to determine when to inspect. In addition, we use other sources of intelligence such as sharing information across teams and using energy efficiency data to target interventions.

In addition, we want to ensure residents are consistently signposted to appropriate support, including housing advice, language interpretation services, and accessible information (such as easy-read, large-print or translated materials), so that barriers related to language, disability or literacy do not prevent issues from being identified and addressed.

27) Councillor Sykes – The King Alfred Leisure Centre Regeneration Project

The extra £3.5m required will it seems take a more than a third of the risk provision of £9.8m for the whole project, before substantive construction has started. Is there a need now to add additional contingency to the project budget?

Response: Cllr Robins

Thank you for your question and interest in the project. You have misunderstood the financials, the £3.5million is not additional funding, but part of the previously agreed budget of £65million. Bringing forward funding reflects the pace at which the project is progressing. In particular, the bringing forward of the early enabling work, including the soft strip of the asbestos removal works in this year's bowling alley. We are working very closely with the design team and contractor to ensure that the project is delivered within the agreed budget.

Later in the year we expect to have an agreed final delivery price with the contractor and at that time we will return to Cabinet to seek agreement to enter into a development agreement based on that price. We are not seeking to increase the project budget at the moment.

28) Councillor West – The King Alfred Leisure Centre Regeneration Project

Given that the recent public meeting held at the King Alfred seemed underwhelmed by the level of leisure facilities this expensive redevelopment will actually provide, and the financial risks associated with the complexity of the site and constraints upon available funding set out in the Risk Implications of this Cabinet report, do Cabinet now regret ignoring the Green Book analysis (18 July 2024 Cabinet report) that clearly showed the benefits achieved for the cost incurred by the redevelopment were not regarded as 'good' and that the alternative of developing the LSS site was stated as the much better option.

Response: Cllr Robins

Thank you, Councillor West. I assume then it is the Green Party policy that we develop on greenfield sites rather than brownfield sites and that we do that against public opinion?

Because that's what we were up against here. And the business case presented to Cabinet in July 2024 demonstrated that the sports and leisure centre on either side would represent good investment as assessed by the government's Green Book methodology.

The decision was taken on the choice of site, took into account the outcomes of the business case and also considered the responses from the public consultation, which was strongly in favour of keeping the development on the existing site. Further in fact, we don't recognise the specification of the new facility as underwhelming.

As set out in the Cabinet papers, a new facility features a much larger fitness suite than the current facility, an extensive soft play area, a larger cafeteria with outstanding sea views and innovative features such as a movable floor for the teaching pool. The project has also been expanded to include the delivery of new public realm in the form of the plaza in front of the main entrance, helping create a compelling indoor and outdoor destination for residents and visitors.

Despite some misinformation that has been circulating, there is a high degree of enthusiasm for the facility amongst local sports clubs, other regular users of facilities, And most residents, the design proposal has been developed, paying close attention to the surrounding heritage of the city to deliver an outstanding piece of placemaking. We are confident the new King Alfred will be an outstanding facility to meet the city's needs for many years to come. Thank you again for your question.

29) Councillor Sykes – The King Alfred Leisure Centre Regeneration Project

What controls has BHCC put in place with Alliance Leisure in respect of their project /cost management of Willmott Dixon Construction as principal contractor for the forthcoming enabling works?

Response: Cllr Robins

Prior to the commencement of any work, a detailed cost plan is being prepared by Willmott Dixon, which will be reviewed by the design team and the project team and reviewed by an independent cost consultants. Once underway, progress and spend will be monitored through weekly project meetings with Alliance Leicester and more detailed monthly meetings with the whole design team and Willmott Dixon.

Some specific points to note are a significant element of the £3.5m approval relates to works undertaken by statutory bodies. For example, the relocation of electrical power cables to be carried out by UK Power Networks.

This work is priced with a fixed fee and is instructed directly by the Council. Any works undertaken by Willmott Dixon will be subject to scrutiny by the Council and their professional team, supported by cost consultants at Abacus, who are Sport England's cost advisors and have specialist expertise in the leisure schemes.

Willmott Dixon are competitively tendering individual work packages to achieve best value from their established supply chain. These work packages will be reviewed in detail by the professional team, with the recommendation then being provided to Brighton and Hove City Council.

Each element of the enabling work will be delivered with the appropriate contract type, subject to close contract management. Thanks again for your question.

30) Councillor Sykes- Temporary Accommodation - Transformation for Sustainability

In the absence of national policy or local advocacy on major contributory causes of the housing crisis such as short term lets, second homes, right to buy etc, are these policy proposals to deal with the housing crisis locally not just an increasingly desperate set of sticking plasters?

Response: Cllr Williams

I wonder what planet people have been living on lately if they can't see what is happening here. And there are national policies, of course, to build more social homes and we're all quite clear about the causes of this national housing crisis, which we've never seen the like of.

So, I'm not really sure what that means and why you're saying that and I'm really pleased that you've given me the opportunity to showcase and show off what I'm very proud to say of what we have achieved so far as an Administration.

I haven't even got time to list them all, so I'm going to be as quick as possible. Apart from the hundreds of new homes we're building, and I mean hundreds, we're also taking firm action and we've introduced a pilot project to circumvent the right to buy, where we're going to provide a grant for people who are eligible to the right to buy programme to buy off the private market, therefore saving council homes. More than any Green Council has ever done anywhere else. We've brought back into use 149 empty homes this year that would be left empty, a down sight higher than any previous, shall I say, Green Council has achieved. And for our short-term rights, I'm really pleased to say that our working group was successful in recommending their findings to government and we're about to take part, I do believe, in a pilot project from government to register short term let. And these are just a few of our achievements. I could go on forever, but I am just really surprised at the question.

31) Councillor Shanks – Asset Strategy

What consultation has been done with residents and ward councillors on the sale of assets generally and specifically regarding the sale of open space at Fawcett Fields and Rowan Avenue.

Response: Cllr Taylor

The council's Asset Management Plan sets out principles for the council's strategic management of its assets to support the delivery of the Council Plan and the MTFs and was approved at Cabinet in October 2025. The Asset Management Plan was not subject to resident consultation.

In identifying assets for potential disposal officers follow the principles set out in the Asset Management Plan. Ward councillors were advised of proposals for Rowan Avenue in advance of the proposal presented to Cabinet. The recommendation to Cabinet for Fawcett Fields is a decision in principle and ward councillors will be advised should a disposal progress.

32) Councillor Shanks – Asset Strategy

How were rent arrears allowed to accrue on the property in Meeting House Lane?

Response: Cllr Taylor

Thank you for your question, Councillor Shanks. And obviously, me more than anyone doesn't want to see any rent arrears on the commercial portfolio because we want the income and obviously, it is disappointing whenever that happens. It does happen across the commercial sector, as you'll be aware, and we're just one landlord in the city. In this specific example, the arrears accrued for a number of tenants, including this one through COVID.

Action was put in place to try and mitigate that risk, including putting a payment plan together with this tenant and other tenants. The risk was clearly identified that non-payment was a possibility, although it was deemed to be a lower risk given the tenant was in the process of negotiating a new lease. And that obviously fell through and we're left with the arrears, which is, as implied, is disappointing, but it is part of overall commercial portfolio.

33) Councillor Shanks – Asset Strategy

Why is the land at Downsview not being developed in house with the council as provider as I think the original intention was?

Response: Cllr Taylor

We think it's really positive and exciting that this site could be used for much needed accommodation for people with learning disabilities or disabilities in the city. The view from the department is that any such facility, those with complex needs, would be best suited to one of the many excellent registered providers that have expertise in this area. The current proposal versus previous attempts to look at this site are looking at a much lower density development, which officers believe will be better in line with the overall planning policy and planning requirements for the site. But overall, I think it's a really positive outcome that we'll talk about in the report later, that we're using this site potentially to build purpose-built new accommodation for residents with disabilities in the city.

34) Councillor Lademacher – Asset Strategy

Given the extreme housing pressures in Brighton & Hove, how will the asset strategy ensure that opportunities for actually affordable housing are maximised?

Response: Cllr Taylor

Thanks for the question, Cllr Lademacher – it's a really important one and goes to the heart of our overall strategy. When we think about our assets: it's "housing first". Can we find ways to use existing assets for the provision of new social housing, or in some cases, higher quality and less expensive temporary accommodation. Examples below (and in this report: Hertford school site).

Where housing is not possible for some reason (planning allocation, scheme viability) - we then consider the best use for the asset, which may include releasing a capital receipt for other purposes: protecting front-line services, transforming the council, or indeed investing in other housing projects.

- Former Oxford Street Housing Office – refurbished to provide 10 homes
- Palace Place – being converted to provide 11 Temporary Accommodation units
- 8 Shenfield Way – To be converted to provide 3 units
- 10 Hangleton Way – To be refurbished to provide a family home
- Slipper Baths – To be converted to provide 11 Temporary Accommodation units
- Land at Mile Oak – To be developed to provide 20 units
- Land at Southdowns Riding School – To be developed to provide 15 units
- Portslade Village Centre: To be developed to provide 28 new homes and a Community Centre
- St Peters Primary School - Feasibility work underway and architects appointed to work up proposals for up to 20 new homes

35) Councillor Lademacher – Temporary Accommodation - Transformation for Sustainability

The report notes that while the council's housing delivery programme will not address short-term pressures, it will increase overall system capacity over time. How does BHCC plan to manage immediate demand for temporary accommodation in the interim, and given the broad support expressed in the consultation for the principle of using of empty council homes for temporary accommodation, will it expand and prioritise the use of empty council homes for this purpose?

Response: Cllr Williams

The council is clear that increasing housing supply is essential to addressing the homelessness in Brighton & Hove. Through the council's Housing Strategy, we have committed to delivering at least 2,000 affordable homes and already have a strong delivery pipeline. This includes the next Homes for Brighton & Hove development at Sackville Road, which will deliver 306 new homes, 60% of which will be at social rent. The report is clear that these supply measures will take time to have a material impact. In the short term, the council is managing demand through strong homelessness prevention performance, the targeted and interim use of empty council-owned homes as temporary accommodation and decisions such as the direct award to Base One. These decisions were taken to move away from unsuitable, high-cost provision and to improve quality and stability for residents.

As set out in the report, the council intends to continue to use empty council-owned homes as temporary accommodation within the agreed caps and safeguards. Consultation responses showed support for this approach, particularly where it improves safety, quality and stability and reduces reliance on costly nightly paid and out-of-area placements.

This activity forms part of a wider transformation programme to stabilise the system in the short term while longer-term supply, prevention and move-on pathways are strengthened.

165 MATTERS REFERRED TO THE EXECUTIVE

165.1 There were none.

166 REPRESENTATIONS FROM OPPOSITION MEMBERS

166.1 Cabinet received a representation from Councillor Shanks on Item 169: Temporary Accommodation - Transformation for Sustainability

167 E-SCOOTER TRIAL CONSULTATION REPORT

163.1 Cabinet considered a report that set out the outcomes of the public consultation on a proposed e-scooter trial and the Council responses and sought approval under delegated powers to add an e-scooter trial to the existing Beryl BTN Bike hire scheme.

163.2 Councillors Allen, Rowkins, Muten, Alexander and Williams asked questions and contributed to the debate of the report.

163.3 **Resolved-**

- 1) Cabinet agrees to note the outcomes of the public consultation on the proposed e-scooter trial and the Council responses for the trial as set out in section 5 of the report and Appendices 1 & 2.
- 2) Cabinet delegates authority to the Corporate Director City Operations in consultation with the Cabinet Member, Transport and City Infrastructure, to implement and run a new e-scooter trial in accordance with Department for Transport requirements.
- 3) Subject to the matters set out in the Part 2 report Cabinet agrees to delegate authority to the Corporate Director City Operations in consultation with the Cabinet Member Transport and City Infrastructure, to enter into the necessary contractual arrangements with the current Bikeshare scheme operator Smidsy (trading as Beryl) for the implementation and operation of the scooter trial and to enter into an extension of the existing Bikeshare scheme (incorporating the scooter trial) for up to two years to cover the period to 30 September 2029.

168 THE KING ALFRED LEISURE CENTRE REGENERATION PROJECT - PROGRESS UPDATE

168.1 Cabinet considered a report that sought agreement to progress the King Alfred Regeneration Project to the next stage of implementation following the completion of the technical design stage (Royal Institute of British Architects Plan of Work Stage 4 or RIBA 4) and the submission of the planning application.

168.2 Councillors Taylor, Daniel, Robinson and Sankey asked questions and contributed to the debate of the report.

168.3 Resolved-

That Cabinet:

- 1) Agrees that the Council enters into Development Management Agreements with Alliance Leisure for enabling works on the new King Alfred leisure facility site including the demolition of the disused bowling alley area.
- 2) Agrees to delegate authority to the Corporate Director City Operations in consultation with the cabinet member for Sports, Recreation and Libraries to finalise the terms of the Development Management Agreements and enter into the Development Management Agreement and any ancillary documentation.
- 3) Agrees to bring forward the allocation of £3.5m from previously agreed project capital budget to fund these works up to November 2026.

169 TEMPORARY ACCOMMODATION - TRANSFORMATION FOR FINANCIAL SUSTAINABILITY

169.1 Cabinet considered a report that sought various approvals to transform its temporary accommodation portfolio, shifting away from costly and unplanned nightly paid provision towards a more sustainable mix of better quality council-owned, leased, block-booked and supported accommodation over the Medium Term Financial Plan.

169.2 Councillors Allen, Robinson and Sankey contributed to the debate of the report.

169.3 **Resolved-**

That Cabinet;

- 1) Agrees to continue the use of using Housing Revenue Account voids as Temporary Accommodation from 19 January 2026 up to 1 May 2027, subject to the exemptions described at paragraph 4.4 and 4.5, with a maximum of 180 properties in scope over that time period.
- 2) Agrees the amended policy on the use of Housing Revenue Account voids as Temporary Accommodation as set out at Appendix 1 of the report.
- 3) Notes the Equality Impact Assessment in relation to the use of voids as detailed at Appendix 2 to the report.
- 4) Agree the new rent review policy as set out in paragraph 5.1 to 5.8 which will set council-owned and long-term leased Temporary Accommodation rents at the appropriate Local Housing Allowance (LHA) Rate for the type of accommodation.
- 5) Note the findings of the Equality Impact Assessment as detailed at Appendix 3 to the report.
- 6) Agree to the establishment of a new hardship fund for households who are in the relevant council-owned, and long-term leased properties who may otherwise be adversely financially impacted as a result of the rent review not in receipt of benefits. The scope, purpose and operation of the hardship fund are detailed in Appendix 4, with the intention of providing support during the transition to the new rent arrangements.
- 7) Agree to delegate authority to the Corporate Director of Homes and Adult Social Care, in consultation with Cabinet Member for Housing, to align rents for council owned properties owned or on long leases by the Council and used as TA with any future increases in Local Housing Allowance rates.
- 8) Agree to delegate authority to the Corporate Director of Homes and Adult Social Care, in consultation with Cabinet Member for Housing to finalise the supporting documents and operational guidance for the hardship fund in accordance with the scope set out in Appendix 4.
- 9) Agree the principle of working with Registered Providers to develop an Exempt Supported Temporary Accommodation model that reduces reliance on high-cost spot-purchased placements and provides vulnerable residents with stable accommodation and embedded support.
- 10) Agree the creation of a nomination process and Service Level Agreement with Registered Providers to govern delivery of the model, clarify roles and responsibilities and establish an appropriate approach to risk-sharing.

170 PRIVATE SECTOR HOUSING ENFORCEMENT POLICY

163.1 Cabinet considered a report that set out and sought approvals for updates to the Council's Private Sector Housing (PSH) Enforcement Policy.

163.2 Councillor Muten contributed to the debate of the report.

163.3 Resolved-

- 1) Cabinet agrees that the amended Private Sector Housing Enforcement Policy, as set out in Appendix 1, is adopted from 1 May 2026.
- 2) Cabinet delegates authority to Corporate Director Homes & Adult Social Care in consultation with the Cabinet Member for Housing to make such amendments to the policy as may be required following adoption as outlined in paragraph 3.6 of this report.

171 ASSET STRATEGY

171.1 Cabinet considered a report that sought approval for the repurposing or disposal of various assets to support delivery of the actions and objectives of the council's Asset Management Plan.

171.2 Resolved-

- 1) Cabinet agrees to the appropriation for housing purposes or disposal of the properties identified at paragraphs 3.4-3.21 of this report and the Part 2 report in the manner set out in the reports.
- 2) Cabinet delegates authority to the Director Property & Finance in consultation with the Director Governance & Law and the Cabinet Member for Finance and City Regeneration to approve terms and take any necessary steps to facilitate and complete the appropriation for housing purposes or disposals of the properties identified and achieve best consideration.

172 E-SCOOTER TRIAL CONSULTATION REPORT (EXEMPT CATEGORY 3)

As per the Part One minutes.

173 ASSET STRATEGY (EXEMPT CATEGORY 3)

As per the Part Two confidential minutes.

174 PART TWO PROCEEDINGS

174.1 **Resolved-** That Cabinet agreed that the confidential items listed on the agenda remain exempt from disclosure to the press and public.

The meeting concluded at 4.20pm

Brighton & Hove City Council

Cabinet

Agenda Item 183

Subject: City Plan - formal commencement of plan making

Date of meeting: Thursday, 14 May 2026

Report of: Cabinet Member for Finance and City Regeneration

Lead Officer: Corporate Director- Operations

Contact Officer: Steve Tremlett

Email: steve.tremlett@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 Brighton & Hove's Local Plan (known as the City Plan) is the city's key planning policy document. It sets out a vision for the city's future development and evolution and has clear links to the delivery of Outcome 1 of the Council Plan '*A city to be proud of*', particularly the aim of '*developing Brighton & Hove as a place where people want to live, work and learn*'.
- 1.2 The City Plan will set the direction for how our city will grow and thrive, shaping the places where people live, work and enjoy to create a better Brighton & Hove for all. It will show where new homes and commercial spaces should go, how development should respect the city's unique character and heritage, and how sustainable growth will be matched with the right infrastructure and green spaces.
- 1.3 This report provides an update on the work so far to produce a new City Plan, and the steps necessary to transition to and progress a 'new-style' Local Plan as set out in the Town and Country Planning (Local Planning) (England) Regulations 2026 (henceforth the 2026 Regulations).

2. Recommendations

- 2.1 Cabinet agrees to authorise the issuing and publication of the 'Notice of intention to commence local plan preparation' under Regulation 19 of the 2026 Regulations.
- 2.2 Cabinet agrees the Local Plan Timetable as set out in Appendix 1 and delegates authority to the Corporate Director, City Operations in consultation with the Cabinet Member for Finance and City Regeneration to update and

publish the Local Plan Timetable as required to ensure an up-to-date timetable is publicly available as the preparation of the City Plan progresses.

- 2.3 Cabinet approves the approach to the Scoping Consultation as described in paragraph 3.8 of the report in line with Regulation 20 of the 2026 Regulations and delegates authority to agree the consultation text and undertake the consultation to the Corporate Director, City Operations in consultation with the Cabinet Member for Finance and City Regeneration.
- 2.4 Cabinet delegates authority to approve, publish and submit the required information for Gateways 1 and 2 as required by the 2026 Regulations, to the Corporate Director, City Operations in consultation with the Cabinet Member for Finance and City Regeneration.

3. Context and background information

- 3.1 Brighton & Hove's new Local Plan (which will now be known as the 'Brighton & Hove City Plan' rather than 'City Plan 2041' as previously) will, on adoption, be the primary development plan document for the city and will set a clear vision and planning strategy for the city moving forward. It will replace the existing City Plan Part One and Part Two with a single document.
- 3.2 The intention is for the new plan to cover the existing administrative area of Brighton & Hove except that part which falls within the South Downs National Park. This is based on government advice that upcoming local government reorganisation (LGR) is not a reason to delay plan-making, and additional funding of £108k has been provided by government on the understanding that the council formally gives notice of the intention to the begin plan-making by 30 June 2026, a step which includes confirming the area the new plan will cover. However, the outcome of LGR in Sussex is expected soon with the reasonable prospect of the outcome being the enlargement of the Brighton & Hove unitary authority. Further clarity is being sought from government on the specific circumstances facing the council in this regard, including whether the outcome of LGR should be awaited before giving notice so that the plan area can align with a future amended boundary.
- 3.3 Work on a new City Plan has been underway for some time, with a first stage of consultation scoping the Key Issues the new plan should address being undertaken from 4 November 2024 to 20 January 2025. This consultation generated a good response from the public and other consultees, with over 700 responses received and provides a robust evidence base to support the new plan. A number of evidence base studies that will inform the new plan have also been completed, a call-for-sites undertaken and technical work to assess potential development sites is well advanced.
- 3.4 In February 2025, after the completion of the Key Issues consultation, the new government announced it intended to continue a process of planning reform started by the previous government by introducing a new system for

plan-making through implementing relevant provisions in the Levelling Up and Regeneration Act 2023. Regulations implementing this new system came into effect on 25 March 2026. Key aspects of the new system are:

- Plans to be simpler and shorter
- Plans to be produced within a 30-month timescale
- A more proportionate approach to the required evidence
- A series of three 'Gateway' assessments. Gateway 1 is a self-assessment of an authority's readiness to begin the 30-month plan-making process, including establishing project management and governance arrangements, the approach to consulting and engaging on the plan and the anticipated plan content. The second and third gateways involve assessments by the Planning Inspectorate and are intended to identify issues with plan content and evidence at an early stage to ensure plans only proceed to the final public examination process when they are ready. Further information on each of the Gateways is set out in Appendix 1.

3.5 Transitional arrangements were put in place to enable plans already in production to continue under the existing system if they could be submitted to government for examination by a hard deadline of 31 December 2026. As the City Plan was at a very early stage of preparation, achieving this deadline would have been extremely challenging. Given the risk of significant aborted work if the deadline was missed it was considered prudent to bring the plan forward under the new system. The extent of work already completed means the council has been able to commit to formally starting work on the Plan promptly after the introduction of the new system and has therefore been awarded £108,000 of government funding to assist with its preparation in line with the accelerated timescale. The funding has been awarded after a commitment was made to 'give notice of the intention to commence Local Plan making' by 30 June 2026 and publish a Gateway 1 self-assessment by 30 October 2026 (see table below). As set out in paragraph 3.2 above, clarity is being sought from government as to whether these deadlines remain appropriate in light of the forthcoming LGR decision.

3.6 The table below, produced by the Ministry of Housing, Communities & Local Government, shows the sequencing of key stages of the new-plan making process:



- 3.7 The new City Plan must follow these legal requirements from the beginning in sequence and a proposed 'Local Plan Timetable' is included in Appendix 2.
- 3.8 The first step is to publish a 'notice of the intention to commence plan-making', a formal public announcement indicating that the council is starting the process of preparing a new local plan. There then begins a minimum 4-month 'getting ready' period before the Gateway 1 self-assessment which will set out details of the council's readiness for formally beginning the preparation phase of the City Plan.
- 3.9 During this 4-month period a 'scoping consultation' must be undertaken. As described in paragraph 3.3 above, a similar 'Key Issues' consultation was

undertaken in winter 2024/25. To minimise the risk of consultation fatigue and to avoid asking for the same information twice, it is proposed that a streamlined, focused approach will be taken to this consultation stage. A short, simple, document will be produced which succinctly outlines what the City Plan is, and the headline topics that it is proposed to address, framed as building on information provided through the Key Issues consultation and in the new draft National Planning Policy Framework. In line with the legal requirements it will also ask how respondents would like to be involved in shaping the plan once the formal preparation phase begins following Gateway 1, expected to be in October 2026. It will be made clear that a major consultation on the Plan's Content and Evidence will take place in 2027.

- 3.10 By focusing the consultation in this way, the new regulatory requirements will be met whilst minimising confusion and enabling quick progression to the more substantive 'Plan Content and Evidence' consultation in 2027, which will contain more detailed information on potential development sites and policies.
- 3.11 The overall 30-month timescale is ambitious. To achieve it, government guidance advises authorities to "*secure efficient sign offs at key stages of the process... [and] to plan effective delegation and identify necessary changes (for example, to change the council's constitution or standing orders)*"¹. The recommendations to this report therefore seek to confirm that certain stages of the new plan-making system can be undertaken through delegated authority to the Corporate Director, City Operations in consultation with the Cabinet Member for Finance and City Regeneration.
- 3.12 The government grant funding awarded to the council requires the statutory self-assessment Gateway 1 to be completed by 31 October 2026. The scoping consultation therefore needs to be approved and completed in a timely fashion. Later in the process, documents and statements must be submitted to the Planning Inspectorate for Gateways 2 and 3. Similar delegated authority is sought for Gateway 2 to ensure that the plan can be prepared and adopted within the required 30-month period.

4. Analysis and consideration of alternative options

- 4.1 The option of not progressing a Local Plan is not considered a reasonable alternative option because the council has a statutory duty to produce one. As such, the only realistic alternative option relates to the timing of when the Local Plan is commenced. The 2026 Regulations set out that the council must publish a 'notice of intention to commence local plan preparation' on or before 31 December 2026. However, additional funding of £108k has been awarded to the council by the government on the basis that it commits to publishing such a notice by 30 June 2026 and to publish the 'Gateway 1' self-assessment, which formally starts the 30-month plan-making period, by 31 October 2026.

¹ [30-month local plan process: an overview - GOV.UK](#)

4.2 The government has indicated it is committed to taking tough action to ensure local authorities have up-to-date local plans in place, and it is prepared to make full use of available intervention powers, including taking over a local authority’s plan making directly, if local plans are not progressed as required. Delaying the preparation of the Plan is therefore not recommended.

5. Community engagement and consultation

5.1 A Key Issues consultation took place from 4 November 2024 to 20 January 2025 which involved extensive efforts to reach all parts of the local community. Over 700 responses were received, far exceeding the total at the equivalent stage for the existing City Plan Part Two. A summary of the responses has been published on the council’s website. Key headlines include broad support for exploring all means of increasing housing density to meet the city’s high housing need figure, including gentle densification in the suburbs and taller buildings in appropriate areas. The affordability of housing was a key concern, with strong support for the provision of genuinely affordable housing, especially more social housing.

5.2 The 2026 Regulations require a scoping consultation to take place during the ‘getting ready’ phase before plan-making formally commences as part of which representations must be invited on how the authority should engage with those responding in the preparation of the local plan. There are then two further public consultations and an Examination in Public process during the formal 30-month period for plan preparation and adoption.

5.3 Ongoing liaison with members on the process for producing a City Plan takes place through the Planning Policy Member Advisory Working Group.

6. Financial implications

6.1 The City Plan work programme is estimated to cost £1.595m, with £0.545m spent to date. Staffing costs are covered by existing General Fund budgets, with no staffing increase being requested. Consultancy expenses fit within the budget except for an anticipated rise in 2026/27, which will be funded by £0.108m in government funding received for accelerating the City Plan preparation.

6.2 Table 1 below outlines the expected costs and funding for the costs incurred to date up to 2028/29.

Table 1 – indicative costs and funding	Costs to date £'000*	2026/27 £'000	2027/28 £'000	2028/29	Total
Staff	400	200	200	200	1,000
Consultancy costs	140	100	50	50	340
Transport Modelling		100	50		150
Engagement and consultation	5	5	5	-	15

Table 1 – indicative costs and funding	Costs to date £'000*	2026/27 £'000	2027/28 £'000	2028/29	Total
Examination and gateway costs	-	-	10	80	90
Total Costs	545	405	315	330	1,595
General Fund Budget	545	297	315	330	1,487
Additional Government funding		108			108
TOTAL	545	405	315	330	1,595

* costs incurred during 2024/25 & 2025/26

- 6.3 The Government funding is conditional on meeting key milestones, including publication of the notice of intention to commence plan-making by 30 June 2026 and completion of Gateway 1 by 31 October 2026. The grant will be applied to eligible plan-making costs and managed in line with the council's financial procedures.
- 6.4 The figures for staff costs include the cost of employing planning policy officers working on the City Plan, adjusted for the estimated proportion of their time spent directly working on the City Plan. It does not include the costs of staff time from officers from the many other teams who will also contribute time in supporting the preparation of the Plan, although this is expected to be funded from the General Fund budgets and not create additional pressures over the MTFs period.
- 6.5 The examination and gateway costs are based on high level estimates and previous costs incurred for similar work. It is expected that these costs will be met from within the current budget envelope for consultancy works, with the 2028/29 costs replacing transport modelling costs projected in 2027/28.

Name of finance officer consulted: Craig Garoghan Date consulted: 24/04/2026

7. Legal implications

- 7.1 The Council has a statutory duty to prepare and maintain an up-to-date development plan for its area. This report proposes a way forward for the City Council's new plan under the new Local Planning Regulations 2026 by taking into account the truncated time for progressing the plan through to eventual adoption.
- 7.2 The report requests that the approval and publication of consultation requirements for Gateways 1 and 2 is delegated to the Corporate Director in consultation with the Cabinet Member for Finance and City Regeneration. At this stage there are no substantive plan policies being determined; this delegation is therefore appropriate as these are the procedural and technical stages of the plan making as opposed to deciding any new plan policies. The later Gateway and subsequent submissions of

the draft plan itself will require further reports and be subject to separate decisions

Name of lawyer consulted: Katie Kam Date consulted 23/04/26

8. Risk implications

8.1 A detailed risk-log is maintained to support work on the City Plan. This has been updated to reflect the publication of the new plan-making regulations.

9. Equalities implications

9.1 None directly relating to this report.

10. Sustainability implications

10.1 The City Plan has a major role to play in managing the environmental implications of development and growth. However, it is too early to be able to report on specific sustainability implications of the new City Plan, as no specific policy proposals have yet been formulated.

11. Health and Wellbeing Implications:

11.1 Once adopted, the new City Plan is expected to use planning policies to help improve health equity and create and develop healthy places and communities. The plan will seek to improve access to essential health and education services by directing development to areas where housing, jobs, and services are easily reachable through walking and cycling.

Other Implications

12. Procurement implications

12.1 None identified directly relating to this report.

13. Crime & disorder implications:

13.1 None identified directly relating to this report.

14. Conclusion

14.1 The council is required to progress a new Local Plan by the 2026 Regulations. This report seeks approval to initiate the process by issuing a Notice of intention to commence local plan preparation' and setting out a Local Plan Timetable. The 30-month timescale for 'new-style' plans necessitates some additional delegation of early gateway stages of the process and approval is sought for this.

Supporting Documentation

1. Appendices

1. Gateway requirements
2. Proposed Local Plan Timetable

Information required at the three ‘gateway’ stages

The Gateway system is a central feature of the new plan-making framework introduced by the Town and Country Planning (Local Planning) (England) Regulations 2026, made under the Levelling-up and Regeneration Act 2023. The Gateways divide local plan preparation into structured stages, each acting as a formal check-point before a plan can progress further.

Gateway 1

Gateway 1 is a self-assessment process which determines whether the Local Planning Authority (LPA) is ready to formally start plan-making and begin to prepare a plan. The self-assessment summary must set out details relating to each of the following 5 areas, as set out in regulations:

- preparing and publishing a local plan timetable
- establishing project management and governance arrangements about the preparation of the plan
- our approach to consulting and engaging on the plan
- anticipated content of the plan
- progressing the Strategic Environmental Assessment (SEA)

The self-assessment summary is made publicly available.

Gateway 2

The purpose of Gateway 2 is for the Planning Inspectorate to assess progress in preparing the plan to support:

- early resolution of potential soundness issues
- progress towards meeting the ‘prescribed requirements’ (requirements for passing through Gateway 3)

Documents or other information person considering necessary in order for the Planning Inspectorate to provide observations and advice must be sent to them. The assessor will give their observations and advice in a workshop and then in a formal report. They will identify practical steps that could be taken to progress the plan, and where further support maybe needed. The observations and advice must be published on the council’s website as soon as is reasonably practicable.

Gateway 3

At Gateway 3 the Planning Inspectorate will provide observations and advice on whether the plan is ready for submission for examination. The proposed submission plan and other supporting documents, including a completed statement of compliance, must be provided.

The plan will be ready if it meets the prescribed requirements (to be set out in regulations). These requirements will relate to:

- legal compliance
- whether all submission documents have been prepared
- whether the council is ready to proceed to examination

Gateway 3 should take 4 weeks or up to 6 by exception. After successfully passing Gateway 3 the following must be made available:

- the documents submitted to the gateway assessor
- a Gateway 3 completion statement confirming the date it was successfully passed

Proposed Brighton & Hove City Plan Timetable

	Stage of Process	Dates
	Give Notice of Intention to Start Plan-Making (latest 30 June)	23 June 2026
	Scoping Consultation (minimum 21 days)	14 July – 7 September 2026
30-month period	Self-assessment Gateway 1 made available (latest 31 October)	28 October 2026
	Further evidence gathering and preparing the plan	October – June 2027
	<i>BHCC Elections</i>	<i>May 2027</i>
	<i>Cabinet</i>	<i>June 2027</i>
	Consultation on proposed plan content and evidence (minimum 6 weeks)	12 July – 13 September 2027
	Gateway 2	1 November 2027
	Reviewing representations and finalising the plan	November 2027 – March 2028
	<i>Cabinet</i>	<i>April 2028</i>
	<i>Full council</i>	<i>May 2028</i>
	Consultation on proposed local plan (minimum 8 weeks)	20 June – 15 August 2028
	Gateway 3	11 September 2028
	Submission of the proposed City Plan to the Secretary of State for independent examination (latest 31 October 2028)	25 October 2028
	<i>Full council to consider adoption of the proposed City Plan</i>	<i>March 2029</i>

Brighton & Hove City Council

Cabinet

Agenda Item 184

Subject: Improving Electric Charging Infrastructure

Date of meeting: Thursday, 14 May 2026

Report of: Cabinet Member for Transport & City Infrastructure

Lead Officer: Name: Corporate Director- Operations

Contact Officer: Name: Kieran Fitsall, Paul Nicholls

Email: kieran.fitsall@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 This report reaffirms the Council Plan 2023-27 commitment to invest in and expand the city's electric vehicle charging network as part of creating a sustainable, low-emission transport system. This supports the national plan to install hundreds of thousands of public chargepoints to support the transition to electric vehicles (EVs) and realise net zero emissions by 2050.

1.2 The report provides an update on the council's progress in installing electric vehicle charging infrastructure, details about the recent procurement of new contracts, the award of government grants, the results from a recent Your Voice survey about EV charging and sets out the council's plan for how it will be expanding the city's EV charging network, which will see it increase from 500 chargepoints currently to over 6,000 by 2040.

2. Recommendations

2.1 That Cabinet notes the award of the LEVI-funded 15-year EV charging infrastructure contracts, the development of proposals for Ultra-Rapid EV Charging Hubs, and the intention for integrated EV charging infrastructure to form a core element of future Park & Ride schemes.

2.2 That Cabinet delegates authority to the Corporate Director of City Operations, in consultation with the Cabinet Member, to take all steps necessary to procure a new contract or modify the existing concession contracts following termination of the contract with Blink for the Lot 2 services for the supply, installation, maintenance and operation of 8kW to 50kW EV chargepoints.

- 2.3 That Cabinet notes the findings of the EV public consultation undertaken on the council's Your Voice platform during summer 2025.
- 2.4 That Cabinet approves the 'Electric Vehicle Charging Policies' as set out in the appendices to this report.
- 2.5 That Cabinet agrees to the use of the Department for Transport (DfT) EV Pavement Channel Grant to carry out a cross-pavement EV charging trial as set out in Section 3.4.

3. Context and background information

3.1 Background

- 3.1.1 On 17 January 2023, the Environment, Transport & Sustainability ("ETS") Committee gave approval for officers to commence a new procurement to facilitate the expansion of the city's EV charging network. In March 2023 the DfT announced the LEVI (Local Electric Vehicle Infrastructure) grant funding scheme and the Council was subsequently successful in its application for the £2.85m of allocated capital funding.
- 3.1.2 This funding was subject to the procurement complying with the LEVI fund's Heads of Terms. These Heads of Terms were published after the ETS Committee had already approved a 10 plus 5-year term for the contract rather than LEVI's recommended 15-year term. Officers requested an exemption to this 15-year term requirement, which was considered by the LEVI Programme Board, but rejected.
- 3.1.3 Authority had already been delegated to officer level to "take all steps necessary to procure and award a new concession contract" and authority was therefore sought from the Corporate Director City Services to tender for a 15-year concession contract in order to comply with the terms of the funding agreement. This authority was approved on 28 August 2024.
- 3.1.4 The procurement for three 15-year concession contracts was advertised on 29 August 2024 as three separate Lots based on power output and included a minimum number of chargepoints to be delivered. Tenderers were permitted to bid for a maximum of two Lots to ensure that at least two chargepoint operators (CPOs) were appointed, thereby providing choice, flexibility and natural competition. Three contracts were awarded in 2025 and CPOs committed to delivering significantly more chargepoints than requested.

Lot	Power	CPO	Chargepoints required	Actual committed to
Lot 1	Up to 8kW	Char.gy	1200	6033
Lot 2	8kW to 50kW	Blink	350	1000
Lot 3	50 kW above	Believ	100	200 + 2 hubs

- 3.1.5 Following contract award but before the services commencement date, Blink have indicated their preference to no longer continue with the Lot 2 contract. Officers are currently in discussions with the respective legal teams to

facilitate that exit by mutual consent. Alternative provision will be made for delivery of the Lot 2 infrastructure in compliance with the procurement regulations.

- 3.1.6 In addition, the existing network of 501 EV chargepoints, operated by Blink under a contract awarded to them in 2019, and due to expire in October 2026, will be transferred to one or both of the other CPOs. Provision was made for this under the terms of the new concession contract.

3.2 Context

- 3.2.1 The vision of the EV Charging Plan for Brighton & Hove is to make charging publicly accessible. Our objective is to create an inclusive, publicly accessible EV charging network that is convenient, affordable, and encourages those living and working in our city to switch to an electric vehicle. Our goals are to:

- Support residents and business to make the transition to an EV;
- Facilitate the provision of an accessible network of charging solutions to accommodate all users' needs;
- Future-proof the EV charging network, enabling expansion to meet increased demand, and
- Deliver a clean and sustainable environment that we can all be proud of.

Details of the actions that will be undertaken to deliver these goals can be found in the 'EV Charging Deliverables – 2025 to 2040' in the appendices.

- 3.2.2 In drafting this plan, consideration has been given to national and local legislation and policies, as well as the economic, social and environmental drivers, and how they align with existing and developing local plans in respect of the delivery of electric vehicle infrastructure. This is further supported in the City Transport Plan published last year. Further details about the national context can be found in section 1 'Policy Framework' in the Background Documents.

3.3 Current position

- 3.3.1 Brighton & Hove is home to approximately 284,000 residents, with more than half of all households lacking off-street parking and therefore dependent on public EV charging infrastructure. Despite this, 83% of these households are within a five-minute walk of a chargepoint, making the city the best-connected EV charging environment outside London. There are currently over 500 on-street public chargepoints of varying speeds across the city.
- 3.3.2 Looking forward, the council's Our City Transport Plan 2035 forecasts that more than half of all vehicles in Brighton & Hove will be electric by 2035, driven by national mandates requiring all new cars and vans to be zero-emission by that date. As of September 2025, 4,857 battery-electric cars are registered locally (4.35% of all vehicles) representing strong

year-on-year growth. By 2040, EV ownership is projected to reach around 82,000 vehicles, accounting for over 75% of registrations. Meeting this demand will require significant continued investment, with more than 8,000 chargepoints needed to support the transition and ensure accessible, reliable charging for residents without off-street parking. Further details about the national context can be found in section 2 ‘Localised Data & Forecasts’ and section 3 ‘Current EV Charging Network’ in the Background Documents.

3.4 Network expansion

3.4.1 The city’s public EV charging network has been developed through a contract with Blink Charging, in place since 2019 and due to expire in October 2026. Under this arrangement, more than 500 chargepoints of varying speeds have been installed across Brighton & Hove, largely funded through national support from the Office for Zero Emission Vehicles (OZEV) via the now-closed On-Street Residential Chargepoint Scheme (ORCS). With ORCS discontinued in 2024, the council has transitioned to using the Government’s Local Electric Vehicle Infrastructure (LEVI) Fund and private investment to expand the network.

3.4.2 Through the LEVI capital fund, the council has secured £2.85 million to support further installations, alongside dedicated capability funding that fully covers the staffing costs of the EV Infrastructure team until 2029. After this point, the team will be expected to become self-financing through revenue generated by the charging network. The LEVI scheme requires each local authority to have a clear and formally approved Electric Vehicle Infrastructure strategy, which the EV Charging Plan is designed to deliver.

3.4.3 The table below details the projected income and expenditure associated with the charging network, and the LEVI grant capability funding. In accordance with the terms of the LEVI funding, revenue generated from the agreements is intended to cover only contract management and costs associated with administering or expanding the network. It is not the desired purpose of those terms for concession fees paid for by users to be excessive or generate significant surpluses.

	2025/26	2026/27	2027/28	2028/29
INCOME	£80,000	£181,450	£281,654	£415,467
GRANT FUNDING	£213,000	£184,000	£184,000	£184,000
EXPENDITURE	£292,617	£331,160	£328,767	£325,280
SURPLUS	£383	£34,290	£136,887	£274,187

3.4.4 In addition, the DfT has made £232k of funding available through its EV Pavement Channel Grant, which would cover the installation of 193 channels for households without off-street parking. The grant supports the installation of a channel or “gully” that allows a charging cable to be run safely through the pavement from the property to a vehicle parked on the road. While this method of charging will not be suitable for every household, it offers a valuable alternative where a public charging solution cannot be

provided. Further details are available in the draft 'Electric Vehicle Charging Policies' document in the appendices.

- 3.4.5 In response, it is recommended that a cross-pavement EV charging trial is undertaken to establish safe and reliable installation and management procedures, as well as to collect user feedback. Applications for the £1,200 grant will be invited from Blue Badge holders who rely on being able to park outside their home, and from taxi drivers who are seeking to switch to an EV.

4. Analysis and consideration of alternative options

- 4.1 Alternative options for the provision of EV infrastructure were considered as part of the ETS Committee report and the recommended option of procuring a non-exclusive concession contract subdivided into three separate lots; one for slow chargers, one for fast chargers and one for rapid chargers was agreed at the Procurement Advisory Board as the option providing the best value for money through a fair and transparent process.
- 4.2 The option of not applying for the allocated LEVI funding was considered, however without the capability funding the council would not have been able to fund the dedicated resources required to deliver the necessary expansion of the EV charging network. The EV team is funded in its entirety by the LEVI fund until 2029. In addition, the LEVI capital fund is subsidising the delivery of over 6,000 chargepoints.
- 4.3 The option of not applying for the allocated EV Pavement Channel Grant was considered carefully. This alternative method of enabling charging is very new and local authority officers across the sector have expressed concerns about it. DfT guidance has since been produced and product manufacturers are addressing these concerns. Whilst this method of charging will not be universally suitable, it is considered that it can supplement public charging.

5. Community engagement and consultation

- 5.1 In developing the Council's approach to the expansion of its EV charging network, officers carried out a public consultation on the Your Voice platform between 15 June and 24 August 2025. A total of 505 people responded to the survey, the majority of whom (91.7%) were residents of Brighton & Hove. Respondents provided detailed feedback on charging behaviour, priorities, and barriers to EV adoption. A copy of the detailed responses can be found in the appendices.
- 5.2 In addition, regular e-newsletters are published to our subscribers and the taxi trade, and news updates are posted to the council's website and via our social channels. In person public engagement is carried out annually at our Charge & Drive community events where the public is given the opportunity to test drive an EV and speak to experts. We also provide an opportunity for residents to suggest a location for a chargepoint; in the last 12 months we have had over 500 requests.

- 5.3 Chargepoint locations are determined through a combination of factors, including demand, site suitability and wider considerations of equity. The council and our chargepoint operators apply a data-driven approach that incorporates resident requests, technical assessments and evidence of usage patterns to identify appropriate areas for new infrastructure. The Council has final approval of all sites.
- 5.4 Most standard chargers use existing infrastructure like lamp columns, avoid creating EV-only bays, and therefore do not require formal consultation. Higher-powered chargepoints require dedicated EV bays and therefore go through a formal Traffic Regulation Order (TRO) process of consultation allowing residents to comment.
- 5.5 The council is committed to the expansion of EV infrastructure and takes great care to ensure chargepoints are sited in locations that minimise disruption to residents while maximising benefit to users. Final site selection also depends on various physical constraints, including the availability and location of a suitable electricity connection.
- 5.6 Over the past year, the council has strengthened collaboration across internal teams - planning, transport, housing, fleet, property - and with developers to ensure EV charging is embedded early in project design and across all service areas. This connected approach is helping future-proof the city's public realm, enabling EV infrastructure to be integrated into major schemes such as Valley Gardens and the A259 cycle lane project. The council is also exploring opportunities with partners to deliver large EV charging hubs, explore Park & Ride opportunities, and support the electrification of car clubs by trialling new models and expanding provision through the LEVI programme.
- 5.7 Electrification of the taxi, private hire and council fleets is a key focus, supported through regular engagement, tariff incentives, dedicated rapid chargers and licensing benefits such as extended vehicle age limits for EVs. Although EV uptake in the taxi fleet remains low, the council continues to explore additional measures to accelerate the transition. Fleet Services and the EVI team are also investigating home-charging solutions and advancing an "electric first" approach to vehicle procurement to ensure the council's own fleet decarbonises effectively and sustainably. Further details about internal collaboration can be found in section 4 'One Council Collaboration' in the Background Documents.

6. Financial implications

- 6.1 The recommendations outlined in changing the contract holder for lot 2 do not impose any additional pressures to Parking Services budgets. The project is fully funded through a combination of grant and contribution from the bidders of the contract with the council receiving a revenue share.

- 6.2 The costs of the cross-pavement EV charging trial also do not impose any additional pressures to Parking Services budgets. As they are also funded through application of a grant.

Name of finance officer consulted: David Wilder
Date consulted (03/04/2026):

7. Legal implications

- 7.1 The procurement of three 15-year concession contracts has been completed in compliance with the Concession Contracts Regulations 2016. Following Blink's confirmation that it does not intend to continue with the services under Lot 2 concession contract, the legal team is working with officers to ensure the appropriate legal steps are taken to formally terminate that contractual relationship. Once the termination is completed, the legal team will continue to advise the service on the Council's available options for securing an alternative means of delivering the Lot 2 infrastructure and associated services. This will include any procurement or contractual modifications.

Name of lawyer consulted: Sabina Cherevichenko
Date consulted: 01/04/2026

8. Risk implications

- 8.1 The key strategic risks for delivery of the EV charging network expansion centre on delays and uncertainty in securing timely power for new charging sites, community acceptance and site suitability, as well as volatility in the energy sector and shifting national policies affecting demand. In mitigation, the length of the contracts awarded afford the opportunity of flexibility in how and when infrastructure is delivered. In addition, this programme is externally funded and no council expenditure is therefore at risk.
- 8.2 The risks of not approving the EV Charging Policies or use of the DfT Pavement Channel Grant, is inconsistency in EV charging decisions, reduced clarity for residents and developers, and the loss of a funded opportunity to trial cross-pavement charging.

9. Equalities implications

- 9.1 The rollout of new public EV chargepoints is designed to improve equity by providing coverage across both central and residential areas, and by ensuring inclusive access through multiple payment methods and charging options. Although EV ownership still tends to favour more affluent residents due to higher purchase costs, the expansion of the second-hand market is helping to make the benefits of lower running costs more widely accessible.
- 9.2 To ensure disabled people are not disadvantaged, all chargepoint operators will be required to follow the national PAS 1899 accessible-charging standard in the provision and design of chargepoints, to minimise barriers such as heavy cables and inaccessible payment terminals. Locations and equipment will be assessed carefully to avoid creating obstructions and to

align with the city's Accessible City Strategy.

- 9.3 An Equalities Impact Assessment (EQIA) has been carried out. It that expanding EV charging will have overall positive impacts but identified risks around accessibility, digital exclusion, cost, and physical safety, particularly for disabled people, older residents, those without smartphones or bank access, and communities with limited existing provision. It recommends designing and locating chargepoints to accessible standards (including PAS 1899), ensuring multiple and non-digital payment options, addressing safety issues such as trailing cables and lighting, and maintaining ongoing engagement to deliver an inclusive, equitably distributed charging network. The EQIA will be reviewed in line with the agreed policies and procedures.

10. Sustainability implications

- 10.1 Brighton and Hove's strategy for decarbonising transport is primarily outlined in Our City Transport Plan 2035 (also known as the fifth Local Transport Plan, or LTP5). The strategy contributes to the city's broader ambition to become carbon neutral by 2030.
- 10.2 The strategy focuses on three core pillars; 1. Reducing the need to travel, 2. Shifting how people travel, and 3. Transitioning to zero emission vehicles. The EV Charging Plan sets out the actionable items that will contribute to delivery of the third pillar. In addition, each of the appointed CPOs have committed to delivering carbon reduction across their contracts and supply chain and will be monitored against their Sustainability Action Plan. Further details about the decarbonisation impact of EVs can be found in section 5 'EV Chargepoint Usage' in the Background Documents.

11. Health and Wellbeing Implications:

- 11.1 The EV Charging Plan is expected to have a positive impact on residents' health and wellbeing by supporting a shift away from petrol and diesel vehicles, which are a major source of roadside nitrogen oxides (NOx) in urban areas. Electric vehicles produce zero tailpipe emissions of NOx and particulate matter, reducing pollutants most closely linked to respiratory and cardiovascular illness. Increased uptake of EVs, enabled by access to reliable charging infrastructure, is therefore expected to contribute to improved air quality, particularly in areas currently experiencing the poorest air quality. By supporting cleaner transport choices across all neighbourhoods, the Plan has the potential to help reduce health inequalities linked to traffic-related pollution while contributing to the city's wider climate, air quality and public health objectives.

12. Conclusion

- 12.1 The recommendations set out in this report provide a clear and deliverable pathway for expanding Brighton & Hove's EV charging network in line with national policy, the Council Plan 2023–27, and Our City Transport Plan 2035. Approval of the Electric Vehicle Charging Policies, the recently awarded LEVI-funded concession contracts and the proposed

cross-pavement charging trial, will ensure that the city has a coherent, future-proofed strategy to support the transition to zero-emission transport.

- 12.2 The scale of investment secured through the LEVI programme, combined with long-term partnerships with experienced CPOs, places the council in a strong position to deliver a comprehensive, accessible and reliable charging network for residents, businesses and visitors. Approving the recommendations will help to reduce barriers to EV adoption in a city where many households lack off-street parking and rely on public charging. This approach also supports wider ambitions to improve air quality, cut carbon emissions and create healthier neighbourhoods. The Electric Vehicle Charging Plan provides the strategic framework to manage this transition responsibly, equitably and efficiently, ensuring that Brighton & Hove remains at the forefront of clean transport innovation.

Supporting Documentation

1. Appendices]

1. EV Charging Policies 2026 (Draft)
2. EV Charging Deliverables 2025-2040
3. EV Survey 2025 Responses

2. Background documents

- 1) Policy Framework
- 2) Localised Data & Forecasts
- 3) Current Ev Charging Network
- 4) One Council Collaboration
- 5) EV Chargepoint Usage
- 6) References

Electric Vehicle Charging Policies

Introduction

This document forms the operational guidance and strategic link for Electric Vehicle Charging Infrastructure (EVCI). It gives clear direction and limitations on decisions officers make.

Cabinet Approval Date: [date]

Aim of Policy

This policy document sets out the Council's approach to the planning, delivery, management, and use of EVCI across the city. In addition to meeting audit and governance requirements, the approval of this document formalises the procedures already in place, promotes consistency, and supports officers in their decision making. It ensures that the provision and operation of charging infrastructure is fair, transparent, and aligned with wider Council objectives, including transport decarbonisation, public realm management, and the efficient use of the highway.

Policy Scope

The policy is subordinate to any legislation, central government guidance or local corporate policy that covers these areas of administration.

Council's Corporate strategy

The policy is directly linked to the Council Plan 2023-27, its priority to be 'a city to be proud of' and goal to deliver "an accessible, clean and sustainable city", by investing in and expanding the city's electric vehicle (EV) charging network. The EV Charging Plan will deliver this by making charging publicly accessible and creating an inclusive public EV charging network that is convenient, affordable, and encourages people living and working in our city to switch to an EV.

Equalities Impact Assessment

A draft Equalities Impact Assessment has been prepared to consider how the Council's approach to EV charging infrastructure may affect all users, and in particular disabled users and other disadvantaged groups. The draft assessment focuses on identifying potential barriers to accessibility and highlights areas where the design, allocation, and management of charging facilities need to be focused to promote equitable use. The findings and proposed actions will be reviewed, refined, and taken forward through the appropriate decision-making processes to ensure the policy supports fair and inclusive access for all users.

CONTENTS

- 1. General Approach to the Provision of Electric Vehicle Chargepoints**
- 2. Conditions of Use**
- 3. Overstay Management**
- 4. Charging Tariffs**
- 5. Enforcement**
- 6. Charging in Car Parks**
- 7. Cross-Pavement Charging**

1. General Approach to the Provision of Electric Vehicle Chargepoints

The Council's approach to the provision of electric vehicle (EV) charging infrastructure is founded on creating a public charging network that is accessible, inclusive, convenient, and affordable for all users. The aim is to support residents, businesses, and visitors in making the transition to electric vehicles by ensuring that safe and reliable charging options are available across the city, and by prioritising locations where charging provision can have the greatest impact in reducing transport emissions.

To meet the needs of a wide range of users, the network offers a choice of charging speeds—standard, fast, and rapid—providing flexibility for different journey types, vehicle capabilities, and user requirements. This mixed speed approach enables routine overnight or daytime charging close to homes and workplaces, as well as high powered options in key locations for those who need to charge quickly. It also ensures that visitors can easily access the most appropriate charging facilities when coming to the city by car.

The Council is committed to delivering a geographically distributed charging network that serves all parts of the city, with particular attention to areas where residents do not have access to off-street parking. Sites are selected using a data driven approach, and in a way that maximises both public benefit and value for money. This approach ensures that chargepoints are installed where they can deliver the greatest benefit to all users, increase accessibility for those unable to charge at home, and support the city's wider goals around air quality, decarbonisation, and sustainable transport.

Different types of charging provisions operate within the city depending on location, parking controls, and the needs of local users. To ensure fairness, efficient use of space, and compliance with wider parking policies, the following rules apply:

2.1. EV Only Charging Bays

Some chargepoints are installed in bays that are restricted to EVs only at all times.

Only vehicles that are actively charging may use these bays.

To support fair access and maximise the availability of charging infrastructure, some dedicated EV only bays will operate with timed restrictions. These restrictions are designed to promote turnover so that multiple users can benefit from the charging facility throughout the day.

Maximum stay periods or time of day limits may be applied, particularly in high demand areas, and will be clearly signed at each location.

2.2. Permit, Paid & Shared Use Charging Bays

In areas covered by controlled parking zones, some charging bays will be designated as Permit, Paid or Shared Use.

Users parking in these bays must comply with the existing parking requirements, including but not limited to, holding a valid resident permit, visitor permit, or paying for parking where applicable.

In addition to meeting the parking conditions of use, users must also ensure their vehicle is plugged in, actively charging and pay the relevant charging tariff.

2.3. General Parking Bays with Chargepoints

Many chargepoints are located in existing general use parking bays that are not restricted solely to EVs.

Where this applies, the underlying parking rules remain in force.

EV users must follow the signed parking rules and pay for parking or display a valid permit if required, in addition to paying for the electricity consumed during charging.

Non-EV vehicles may continue to use these bays as normal.

2.4. Disabled EV Charging Bays

Some locations include dedicated accessible bays for disabled users of EVs.

These bays are reserved solely for Blue Badge holders using an EV and actively charging.

The design, layout, and operational requirements for these bays follow the principles of PAS 1899: Accessible EV Charging, to ensure safe, equitable, and barrier free access.

These bays may include additional space, kerb free access, and placement considerations to support ease of use for disabled drivers and passengers.

Some disabled bays will also include chargepoints but will not be dedicated to EVs only. Where this applies, the underlying parking rules remain in force and non EV vehicles may continue to use these bays as normal.

3.1. Dedicated EV Charging Bays

To ensure fair access to charging infrastructure and promote turnover in high demand locations, some dedicated EV only charging bays will operate with a maximum permitted stay. Where a user exceeds this limit, an overstay charge will be applied by the network operator on behalf of the Council. This charge reflects the opportunity cost of the bay being unavailable to other users and is calculated using a standardised approach that considers both the duration of the overstay and the nominal power rating of the chargepoint. The overstay charge is determined using the following formula:

$$\text{Overstay charge (£)} = \frac{\text{minutes overstay} \times \text{nominal kW rating} \times (\text{tariff rate} - \text{elec cost price allowance})}{60}$$

This approach ensures that overstay penalties are proportionate, transparent, and directly related to the lost charging opportunity for subsequent users. All overstay terms will be included in the network operator's terms and condition within the operator's app, payment interface or website.

3.2. General Parking Bays with Chargepoints

In locations where chargepoints are installed within general parking bays that are not restricted solely for EVs, all existing parking regulations will continue to apply. EV users must comply with local parking controls—including payment requirements, time limits, and permit restrictions—while using the chargepoint. Failure to follow the signed parking rules may result in the issue of a Penalty Charge Notice (PCN), regardless of whether the vehicle is actively charging. This ensures fair access to limited parking space and maintains consistency with wider parking enforcement across the city.

The Council operates a concession-based model for its public charging network. While individual chargepoints are operated by contracted network operators, tariff setting is subject to Council oversight.

4.1. Tariff Setting

Charging tariffs—including rates for standard, fast, and rapid charging—are determined by the appointed network operator and not the Council.

Tariffs must be submitted to the Council for approval to ensure they are fair, transparent, and aligned with local policy objectives.

Tariffs will take account of operational costs, energy pricing, and the need to maintain an economically viable network.

4.2. Tariff Review

All tariffs are reviewed annually as part of the contract management process.

The Council benchmarks tariffs to ensure they do not exceed the average cost of public EV charging across Sussex, maintaining affordability and competitiveness.

Benchmarking also ensures that the network operator provides fair value and does not disadvantage local residents or businesses.

4.3. Transparency

All tariff information must be clearly displayed either at chargepoints or within the operator's digital platforms.

Users must be able to see the cost of charging before initiating a session.

4.4. Concessions

Concessions may be offered to specific user groups, including taxis, car clubs, and Blue Light card holders, with the value of any concession agreed between the operator and the Council and publicised on the Council's website.

The effective operation of the public EV charging network relies on fair access, responsible use, and compliance with the rules governing charging bays. Enforcement measures are in place to ensure that charging infrastructure remains available for those who need it and to prevent misuse that reduces availability for other users.

5.1. Requirement to Be Actively Charging

EVs using an EV only charging bay must be plugged in and actively charging. A vehicle that is parked in a dedicated EV charging bay but not connected to the chargepoint or not charging may be issued with a Penalty Charge Notice (PCN). This requirement ensures that dedicated bays are used solely for charging rather than general parking.

5.2. Adherence to Parking Regulations

In addition to paying for the electricity consumed during charging, EV users must follow the signed parking rules and pay for parking or display a valid permit if required, as well as adhere to any maximum stay periods or time of day limits.

5.3. Non EV Vehicles in EV Charging Bays (ICEing)

Parking a non-electric vehicle in any bay designated for EV charging is not permitted. Non EV vehicles occupying an EV only charging bay - commonly referred to as "ICEing" - will be liable to receive a PCN. This applies to all EV only bays, including those with time limits, accessibility features, or other operational restrictions.

5.4. Overstays in Dedicated EV Bays

Overstay management and associated charges are addressed earlier in this policy. Enforcement for overstays operates in parallel with standard parking enforcement to ensure turnover and to maintain access in high demand locations.

6.1. Position on EV Charging in Existing Council Car Parks

The council currently operates three types of car parks across the city:

- Naturally ventilated - multi-storey car parks with open sides that allow ventilation
- Enclosed car parks – underground / multi-storey locations with little or no natural ventilation
- Surface car parks – street level locations open to the elements.

The council currently has electric vehicle charging facilities located within each type of car park that present their own challenges. Within naturally ventilated and enclosed car parks, the council uses external assessors to conduct fire risk assessments on an annual basis and consult on EV charging within those locations.

If fire risk assessments show an increase in the risks posed by EV charging, then the council shall reserve the right to install additional safeguards or to remove charging facilities in the interest of safety. The Council does not currently intend to install additional EV charging infrastructure within existing Council owned car parks. This position reflects:

- The prioritisation of on-street charging to meet local residential need.
- The financial and logistical challenges of retrofitting legacy car parks.
- The availability of alternative funding routes and market-led provision in commercial parking settings.

Existing Council car parks will continue to operate as petrol, diesel, hybrid, and EV vehicle parking locations without the installation of new chargepoints.

If future opportunities arise for the installation of additional EV chargepoints within car parks then consultation with a fire risk assessor would need to be undertaken and the final decision would lie with the site responsible person for that location.

6.2. Position on EV Fire Safety in Car Parks

The Council acknowledges the public interest in EV fire safety and recognises robust evidence that:

- Electric vehicles do not present a greater fire risk than petrol or diesel vehicles.
- A vehicle connected to an EV chargepoint does not increase the likelihood of a fire.

The Council will therefore continue to permit EV parking in all Council car parks without additional restriction, as EVs do not pose an elevated fire risk when compared with internal combustion engine (ICE) vehicles.

The council reserves the right to nominate specific parking bays for EV parking within car parks in the event of recommendation from competent professionals or legislation changes.

6.3. Requirements for New Build Car Parks

While the Council currently chooses not to retrofit existing assets, we will work proactively with developers and partners involved in new build car park projects to ensure that:

a. Fire Safety Standards Are Fully Met

All new multi-storey and basement car parks must comply with the relevant national fire safety standards and guidance relating to EVs, including appropriate detection, suppression, ventilation, and structural protections suitable for the small risk of any vehicle fire, regardless of propulsion type.

b. Passive EV Charging Infrastructure Is Included

Developers must ensure that all new car park designs incorporate passive infrastructure—such as ducting, cable routes, and sufficient electrical capacity—to enable EV chargepoints to be installed either during construction or at a future point with minimal cost and disruption.

This approach ensures futureproofing of assets without mandating immediate installation of chargepoints.

Any consideration of EV chargepoint installations would be in consultation with a fire risk assessor, with the final decision made by the site responsible person for that location.

6.4. Position on E-Bikes, E-Scooters and Battery Storage in Council Car Parks

The Council recognises the growing role of e-bikes and e-scooters in supporting sustainable transport and modal shift. However, lithium-ion batteries used in micromobility devices present different risk characteristics, particularly during charging.

a. Prohibition on Charging in Car Parks

Council car parks are not designated charging areas for e-bikes, e-scooters or other personal mobility devices. Charging such devices within car parks—including in stairwells, plant rooms or general parking areas—is not permitted due to heightened fire risk during charging cycles, especially when noncompliant or damaged chargers are used.

b. Permitted Parking and Storage

Parking of e-bikes and, where legally permissible, e-scooters may continue in designated cycle parking areas within car parks, provided that:

- Devices are not charged while parked.
- Batteries are not removed for charging within the car park.
- Parking does not block fire exits or emergency access routes.

This supports micromobility users while managing fire safety.

Car parks located beneath residential buildings will permit the parking of e-bikes and legally permissible e-scooters in designated cycle parking areas provided that the batteries are removed from the bike.

c. Design Requirements for New Build Car Parks

For new car park developments, the Council will work with developers to ensure:

- Cycle parking areas are suitably designed to accommodate e-bikes, including consideration of compartmentation, ventilation and safe positioning.

- Where charging for micromobility devices is proposed, it must be located within dedicated, fire engineered enclosures, not in open-access parking decks.
- Fire strategies account for the presence of battery-powered micromobility devices.

d. Public Guidance and Enforcement

The Council will reinforce this policy with:

- Clear signage and public messaging.
- Advice about safe battery charging practices.
- Enforcement through routine car park management.

If future opportunities arise for the addition of e-bike and e-scooter charging facilities within car parks, it would need to include fire safe battery charging locations developed in consultation with a fire risk assessor. After consultation, the final decision would lie with the site responsible person for that location.

6.5. Summary of Council Position

- The Council's strategic priority for EV charging is on-street provision.
- No new chargepoints will be installed in existing Council car parks at this point.
- EVs do not pose greater fire risks than petrol or diesel vehicles.
- New car parks must incorporate fire-safe design and passive EV infrastructure.
- E-bikes and e-scooters may be stored in designated areas but may not be charged within car parks.
- New car parks must include safe micromobility storage and charging solutions if charging is provided.

This policy ensures a safe, evidence based and future ready approach to EVs, micromobility and car park management across the borough.

7.1. Position on Cross Pavement EV Charging

The Council's approach to cross pavement charging (XPC) is founded on ensuring that installations are safe, accessible, and do not compromise the primary function of the footway. An XPC system will only be permitted where it can be demonstrated that:

- Safety and accessibility for pedestrians take precedence over private charging convenience.
- A conventional on-street chargepoint cannot reasonably be deployed at the location.
- Installations meet all licensing conditions and can be removed or reinstated with minimal impact on the highway.
- Approvals are property specific, nontransferable, and subject to ongoing compliance with Council standards.

7.2. Applicant Eligibility

Applicants must meet all of the following criteria:

- The applicant occupies the residential property adjacent to the proposed installation site.
- The property is a single dwelling, not a flat or upper floor property.
- The property has no access to off-street parking.
- For rented properties, the applicant must provide written landlord consent for the home chargepoint.

7.3. Site Suitability Requirements

XPC installations will only be permitted where a public on-street chargepoint cannot reasonably be provided and where the site satisfies all of the following suitability criteria.

7.4. Residential and Parking Conditions

There must be a reasonable likelihood that the applicant can park outside their property, based on local parking conditions, and the property must not have an existing vehicle crossover. Properties in areas that have a waiting list for a resident parking permit are unlikely to be eligible.

7.5. Footway Infrastructure and Condition

The footway must be of sufficient width and good structural condition, and the route free from obstructions such as trees, utility covers, street furniture or grass verges.

7.6. Accessibility Requirements

Installations must not be located in areas where pedestrian movement is already constrained, such as narrow pavements, pinch points, in areas of high pedestrian footfall or locations where tactile paving is present for crossing points.

Clear, unobstructed pedestrian access must be maintained at all times. XPC installations must not compromise the safe use of the footway for any user, including disabled people, wheelchair users, mobility aid users, people with visual impairments, or those pushing prams and pushchairs. To ensure that footways remain safe, inclusive and fully accessible, the following requirements apply:

a. A minimum clear footway width of 1.5 metres

Minimum clearway must be maintained once the XPC system is installed and when the cable is in use. This standard ensures sufficient space for pedestrians to pass one another comfortably and allows safe movement for users with mobility aids, wheelchairs or pushchairs. In locations with higher footfall or where vulnerable users are more likely (e.g., near health facilities, schools or sheltered housing), a greater width may be required to maintain safe accessibility.

b. Visually impaired users

The design and installation must not create hazards for visually impaired users. The XPC systems must be designed so that they do not introduce uneven surfaces or ambiguous tactile cues that could be misinterpreted as part of the footway's guidance system.

c. Flush fitting

XPC systems must be fully flush with the surrounding pavement surface, with no lips, edges or protrusions. Any raised edges or gaps may pose a significant trip risk, particularly to users with reduced mobility, those using canes or mobility aids, and people with visual impairments.

d. In use

When the cable is in use, the routing must ensure that no part of the cable encroaches into the minimum clear width or creates an obstruction that could impede wheelchair users, people pushing prams, or pedestrians walking side by side.

e. Not in use

When not in use, the cable must be fully removed from the XPC system and stored on the property so that no part of the equipment obstructs pedestrian movement or introduces a trip hazard. Cables left in the XPC system whilst not actively charging pose a risk and may result in the licence being removed.

7.7. Regulatory and Planning Compliance

XPC installations in the highway require approval under the Council's licensing arrangements for which a fee is payable. This fee covers the officer time to carry out a site survey and decide the application. An annual licence fee is also payable to cover routine inspections. All fees and charges can be found in the latest fees and charges committee documents. These fees are reviewed annually.

Installation of a home chargepoint does not usually require planning permission but may require additional consents in conservation or heritage areas.

All electrical works must comply with relevant standards, including BS 7671 and appropriate earthing protection.

7.8. Insurance Requirements

Applicants must maintain adequate insurance for the XPC system and associated equipment. Public liability insurance of at least £10 million must be held throughout the licence period and proof of insurance must be provided prior to installation.

7.9. Unsuitable Locations

XPC installations will not be permitted in the following circumstances:

High Footfall or Sensitive Locations

Areas near schools, hospitals, busy commercial frontages, or where the footway surface is uneven or fragile.

Obstructed or Complex Streetscapes

Presence of trees, grass verges, drainage features, junctions, or other constraints preventing a safe cable route.

Parking Constraints

Locations where adjacent parking is heavily contested or restricted.

Safety Hazards

Locations where electrical compliance cannot be achieved, or where proximity to electrical installations or metal structures creates risk.

Planning Restrictions

Conservation or heritage settings where required approvals are unlikely to be granted.

Property Constraints

Properties that front directly onto the pavement without defensible space, flats, upper floor dwellings, or properties with off-street parking.

7.10. Fees and Charges

Applicants will be responsible for paying:

- An application fee covering eligibility screening and initial assessment.
- A licence fee permitting the installation and use of XPC in the highway.
- Full installation costs including materials, labour, reinstatement, and any traffic management.
- Any additional fees associated with obtaining consents.
- An annual inspection fee for ongoing safety checks.
- Removal or reinstatement costs where necessary due to non-compliance, safety issues, or highway works.

7.11. Licence Conditions and Responsibilities

Once approved, the following conditions apply:

- The licence is personal to the applicant and linked to the property.
- Only Council approved XPC systems may be installed, these are listed on our website.
- The applicant is responsible for maintaining the installation and associated home chargepoint.
- Charging cables must be removed and safely stored on the property when not in use.

- The Council may suspend or revoke the licence due to safety concerns, misuse, non-compliance or operational requirements.

7.12. Health and Safety

All installations must comply with electrical and health and safety regulations and work must be undertaken by competent installers, with certification provided to the Council upon completion.

7.13. Data Protection

Personal data will be processed in accordance with data protection legislation for the purposes of administering licences, monitoring compliance, and evaluating scheme outcomes.

EV Charging Deliverables – 2025 to 2040

1. Support residents and businesses to make the transition to an EV	
Action	Timeline
Work with housing providers, schools, and council services to ensure all communities have equitable access to EV charging solutions and tailored support to make the transition to electric vehicles.	ONGOING
Engage with local communities and stakeholders to raise awareness about EV adoption, charging options and how to request and locate a chargepoint.	ONGOING
Require car club operators to provide a mixed fleet, including fully electric vehicles.	DEVELOPING
Work with chargepoint operators to ensure residents have access to fair and competitive public charging tariffs, reducing the cost gap between home and on-street charging and supporting an equitable transition.	IMMEDIATE
Ensure the EV charging network is reliable and customer-focused by enforcing strict operator performance standards, monitoring KPIs for uptime and responsiveness, and requiring clear, accessible support channels for users.	ONGOING
2. Facilitate the provision of an accessible network of charging solutions to accommodate all users' needs	
Action	Timeline
Expand coverage prioritising residential locations with limited off-street parking and disadvantaged communities.	IMMEDIATE
Deploy a mix of slow, fast, and rapid chargers across the city, in line with demand and balancing the needs of all users.	ONGOING
Ensure infrastructure meets PAS 1899 accessibility standards and engage with disability advocacy groups for inclusive design approaches.	ONGOING
Implement safe cross-pavement charging solutions where public charging solutions are not viable.	DEVELOPING
3. Future-proof the charging network, enabling expansion to meet increased demand	

Action	Timeline
Collaborate with operators, landowners and partners to maximise growth.	DEVELOPING
Prioritise strategic EV hubs (Park & Ride, e-Mobility Hubs) and destination charging to secure tourism and facilitate fleets and businesses to transition to EV.	FUTURE
Embed collaboration with internal directorates on public schemes and new developments to future-proof the network.	ONGOING
Secure funding via partnerships and national grant and innovation schemes.	ONGOING
Adopt innovation including real-time status, bay monitoring, overstay management and bi-directional charging.	DEVELOPING / FUTURE
Ensure financial sustainability with dynamic pricing and cost-reflective competitive tariffs.	ONGOING
4. Deliver a clean and sustainable environment that we can all be proud of	
Action	Timeline
Accelerate internal and external fleet electrification including home charging solutions for employees and support for SMEs.	DEVELOPING
Support electrification of taxis, shared mobility and public transport.	FUTURE
Enable transition to zero-emission vehicles through incentives and partnerships.	ONGOING
Integrate renewable energy into charging infrastructure, maximising use of solar and battery storage.	FUTURE
Ensure delivery partners provide renewable electricity only, implement carbon monitoring and have sustainability plans in place.	ONGOING

TIMELINE DEFINITIONS:

ONGOING - Activities that require continuous attention, monitoring, or iterative delivery across the entire lifespan of the Programme. These actions do not sit within a single phase because they underpin all stages of implementation, ensuring the network remains reliable, equitable, and user-centred as it grows.

IMMEDIATE - Actions that need to begin right away to establish the foundations of the Programme. These are high-priority, operational, or enabling tasks that directly support early delivery and user confidence.

DEVELOPING - Actions that build on early delivery and evolve as demand grows, technologies mature, and partnerships expand. These activities represent the scaling or enhancement phase of the Programme.

FUTURE - Long-range actions designed to align with the city's transport decarbonisation outcomes. These initiatives prepare for widespread EV adoption, advanced technologies, and future policy requirements.

Expanding our electric vehicle charging network public consultation results

Public consultation period: 15 June 2025 - 24 August 2025

Project owner: BHCC EVI Team

Background

The government has committed to ensuring all new cars and vans sold are electric by 2035. Switching from petrol and diesel vehicles to electric ones is a vital step to improve local air quality and reduce carbon emissions from transport. For Brighton & Hove, this means making sure residents, visitors, and businesses can easily charge their vehicles and helps our aim for the city to be carbon neutral by 2030.

We've already installed over 500 chargepoints across the city, giving us some of the best coverage outside London but we know there's more to do. Our challenge is to provide convenient charging options for everyone, especially those who park on street without off-road access. Over the next 15 years, we plan to install thousands more chargepoints to make charging easier and reduce walking distances.

We conducted this survey because your views matter. By hearing the public's experiences and ideas, it can help to shape our Electric Vehicle Charging Plan and decide where future chargepoints should go. This information will influence how Brighton & Hove supports the transition to cleaner, greener transport.

Methodology

The consultation was hosted on the YourVoice platform and was promoted via the council's social media channels, public sessions in libraries where leaflets were handed out, along with specific EV events and also distributed to people who had already signed up for updates on EV infrastructure via our online council enquiry form. Emails with a link to the survey were also distributed to relevant stakeholders from our external and internal stakeholder list, to participate and share with their networks to encourage broader participation.

All people were invited to visit the council's digital engagement platform 'Your Voice' where they could access more information and be able to comment on the consultation. Respondents were also invited to 'follow' the project on Your Voice which will enable them to receive automatic updates as the project progresses onto its next phase.

The consultation was also promoted via Electric Brighton, a community initiative that

encourages the transition to Electric and Low Emission vehicles, who sent details of the consultation to their distribution list.

Overview

Vehicle Ownership and Charging Behaviour

- 93% of respondents have access to a vehicle, of these, 68.5% park on-street.
- 68% of vehicle owners have an EV or Plug-in Hybrid, and 90% of these use the public chargepoint network in the city.

Charging Priorities and Experiences

Reliability and availability of chargepoints were consistently rated as the highest priorities, 81.2% and 75.7% respectively. Respondents also highlighted issues with non-EVs blocking dedicated charging bays, reinforcing the need for EV-only parking at charging locations.

Charging at home remains a strong preference, with 71.9% rating it as *very important* and among non-EV owners, the main barriers to EV adoption were *lack of home-charging options* (70.7%) and *insufficient on-street charging* (62.1%).

When asked about barriers to accessing a chargepoint, respondents most frequently cited:

- Chargepoints not working
- EVs and non-EVs blocking charging spaces
- Problems using the Blink app

Cost, Convenience and Charging Patterns

Public charging costs were a significant concern for many participants, with 69.4% stating that current public charging prices are not fair and noting that they remain considerably higher than the cost of charging at home. Despite this, most respondents indicated a degree of flexibility in accessing charging infrastructure, with 74.1% willing to walk up to five minutes to reach a chargepoint. Preferences regarding chargepoint power output were also relatively balanced, with respondents showing similar levels of interest in rapid chargers (33.1%) and slow lamp column chargers (32.5%).

When considering how they prefer to use their time while charging, respondents identified a range of typical activities. The most common was overnight charging (40%), followed by completing daily tasks at home (30.3%). A further 23% said they would typically choose to eat or drink while their vehicle is charging, reflecting the diversity of charging behaviours and the need for infrastructure that supports different charging patterns.

Interest in Cross-Pavement Solutions

Finally, 53.5% of respondents expressed interest in using cross-pavement gullies to facilitate home charging. Of those, 69.5% said they would be willing to share their chargepoint with others if reimbursed.

Headlines

- 505 people responded to the survey, with 91.7% of respondents being residents of Brighton & Hove.
- 93% of respondents have access to a vehicle with 68.5% of those parking on-street.
- 68% of those with a vehicle have an EV or Plug-in hybrid, with 90% of the EV/Plug In Hybrid owners using the public chargepoints in the city.
- Reliability and availability of the chargepoints rated highest when it came to priorities, 81.2% & 75.7% respectively, with mentions of the need for dedicated EV only bays due to chargepoints being blocked by non-EVs.
- 71.9% rated being able to charge at home very important.
- Access to a chargepoint saw, 'It not working', 'EV and no-EVs blocking spaces' and 'the Blink app not working' as the main issues encountered when trying to charge.
- Overall the current Blink charging network received an average rating of 2.8 out of 5.
- 69.4% of respondents asked about the cost of public charging said it is not fair. Comments mention that charging at public chargepoints is more expensive than home charging.
- 74.1% are willing to walk 5 mins or under to access a chargepoint
- The power of chargepoint output people want to see was reasonably even with Rapids receiving 33.1% and slow lamp column chargers 32.5% of the vote.
- We asked what people wanted to do while charging - top 3 choices: Overnight Charging (40%), Daily tasks at home (30.3%), Eat/Drink (23%).
- EV Adoption barriers for non-EV owners saw 'No home charging' (70.7%) and 'Insufficient on-street charging' (62.1%) top the list of blockers.
- 53.5% of those asked confirmed they would be interested in using cross-pavement gullies, with 69.5% of those respondents willing to share their chargepoints if re-imbursed.

CONSULTATION HEADLINES

505
respondents

91.7% of respondents are Brighton & Hove residents

VEHICLE OWNERSHIP AND CHARGING BEHAVIOUR

83% have access to a vehicle



68 % park on-street

68% have an EV or plug-in hybrid
90% of these use public charging



CHARGING PRIORITIES AND EXPERIENCES

★ 81.2% reliability of chargepoints

75.7% availability of chargepoints

Barriers cited:

- › Chargepoints not working
- › EVs and non-EVs blocking charging spaces
- › Problems using the Blink app

70.7% Lack of home charging options

62.1% Insufficient on-street charging

Charging activities:

- 40% overnight charging
- 30% doing tasks at home
- 23% eating or drinking while charging

COST, CONVENIENCE AND CHARGING PATTERNS



69.4% say public charging costs are not fair



74% will walk up to five minutes to charge



33% use rapid charging



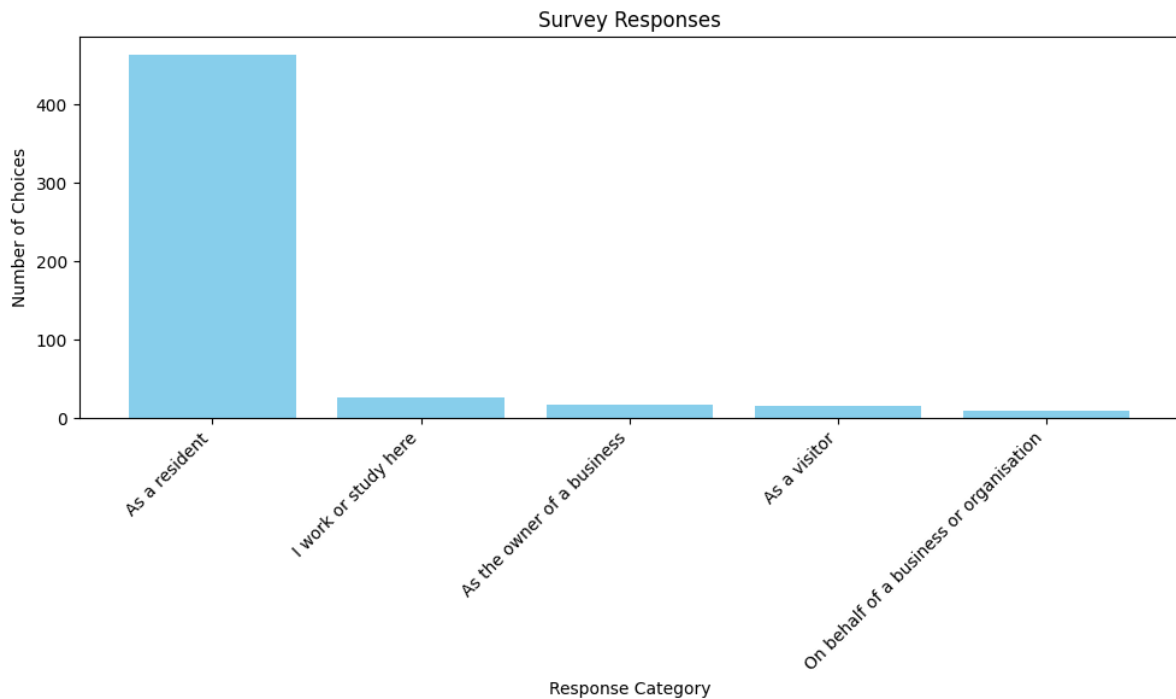
32% use lamp columns

Survey Results

505 valid responses were received. Please note that not all participants answered every question. Depending on responses, participants were routed to the next relevant question. The total response for each question is noted.

About You

How are you responding to this survey? *All respondents were asked this question*
(505 responses)

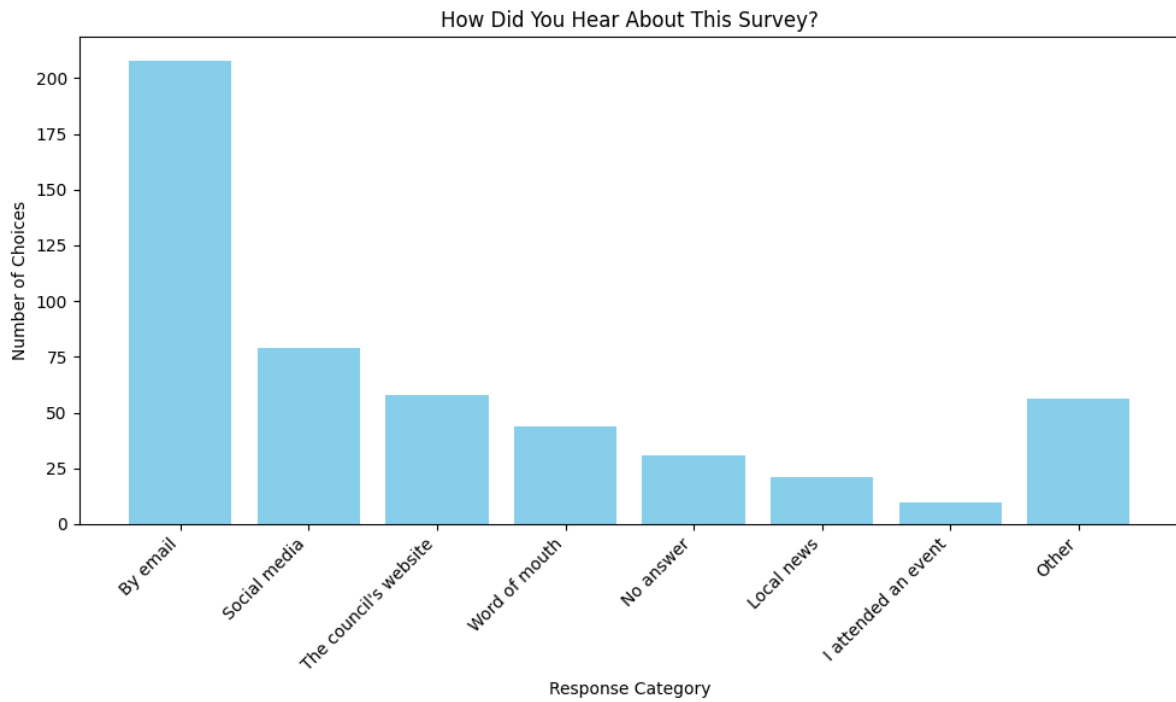


Survey Responses	Total
As a resident	91.7% (463 choices)
I work or study here	5.3% (27 choices)
As the owner of a business	3.4% (17 choices)
As a visitor	3.2% (16 choices)
On behalf of a business or organisation	2% (10 choices)

How did you hear about this survey? All respondents were asked this question

Multiple choice

(474 responses)



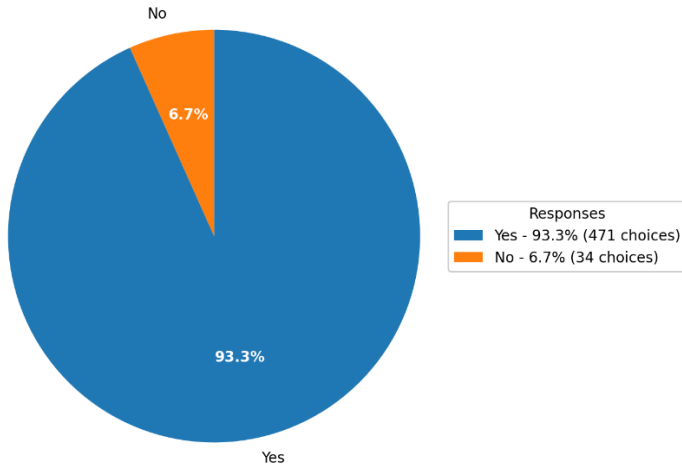
How did you hear?	Total
By email	41.2% (208 choices)
Social media	15.6% (79 choices)
The council's website	11.5% (58 choices)
Word of mouth	8.7% (44 choices)
No answer	6.1% (31 choices)
Local news	4.2% (21 choices)
I attended an event	2% (10 choices)
Other	11.1% (56 choices)

About your vehicle

Do you own or have access to a vehicle? All respondents were asked this question

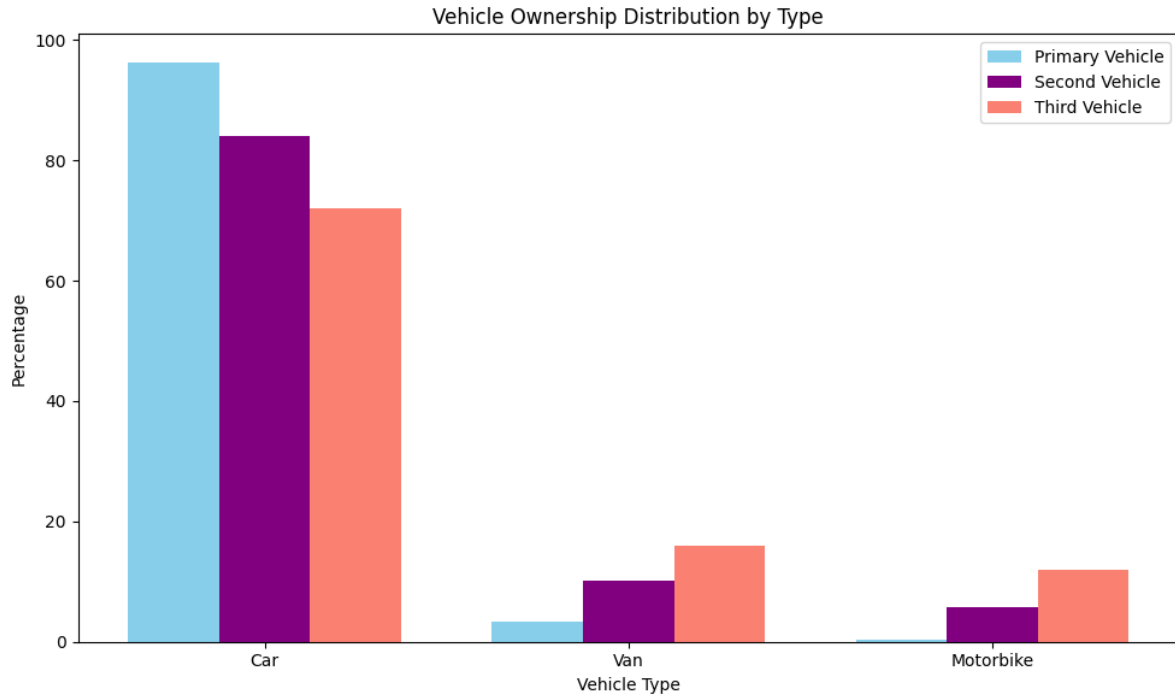
(505 responses)

Do you own or have access to a vehicle?



Own a vehicle	Total
Yes	93.3% (471 choices)
No	6.7% (34 choices)

How many vehicles do you own or have access to? *Respondents who indicated they owned or had access to a vehicle were asked this question.*
(473 responses)

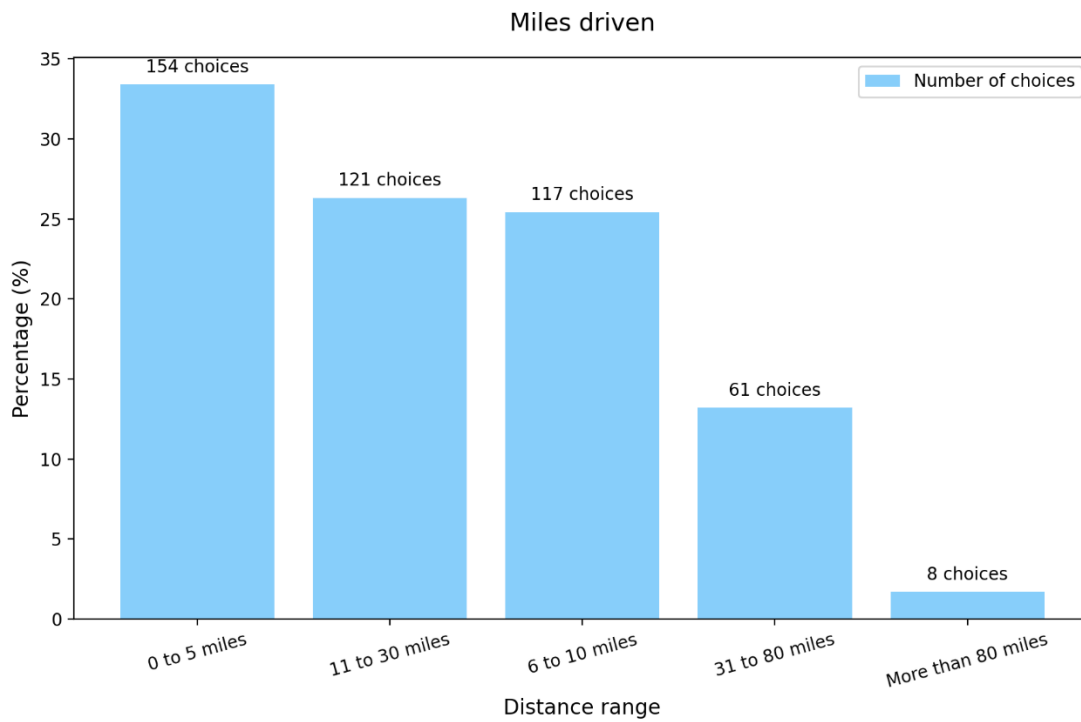


Vehicle Type	Primary Vehicle	Second Vehicle	Third Vehicle
Car	96.19%	84.06%	72%
Van	3.39%	10.14%	16%
Motorbike	0.42%	5.80%	12%

How many miles do you drive your primary vehicle on a typical day?

Respondents who indicated they owned or had access to a vehicle were asked this question.

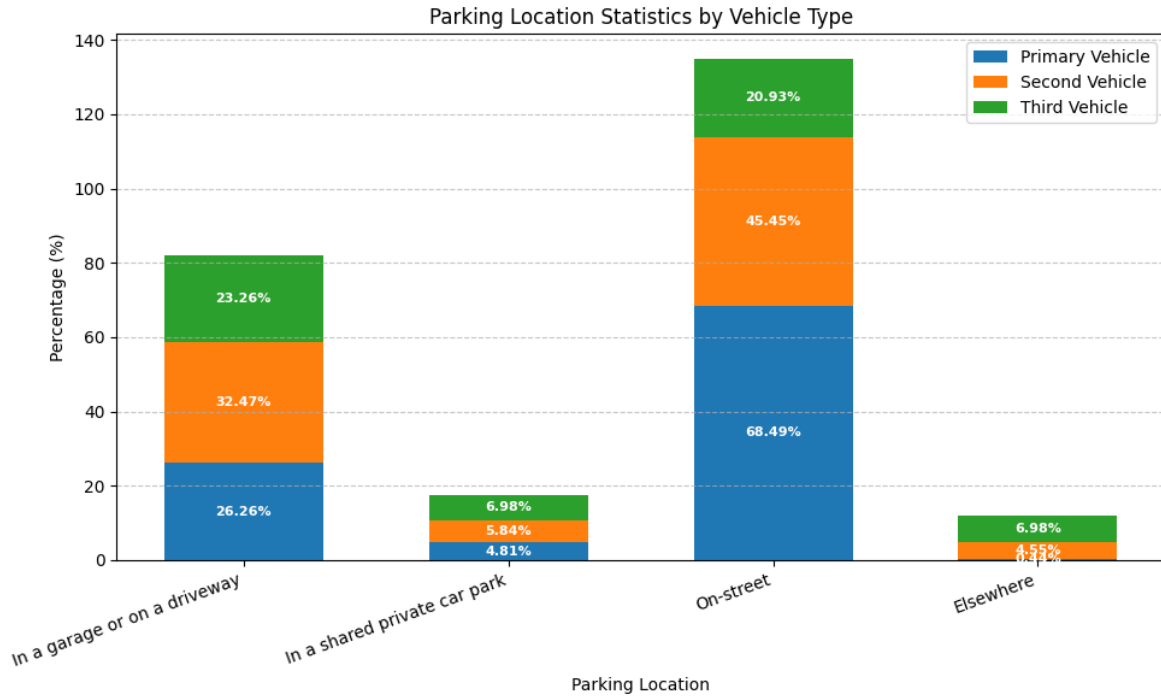
(461 responses)



Miles driven	Total
0 to 5 miles	33.4% (154 choices)
11 to 30 miles	26.3% (121 choices)
6 to 10 miles	25.4% (117 choices)
31 to 80 miles	13.2% (61 choices)
More than 80 miles	1.7% (8 choices)

Parking your vehicle

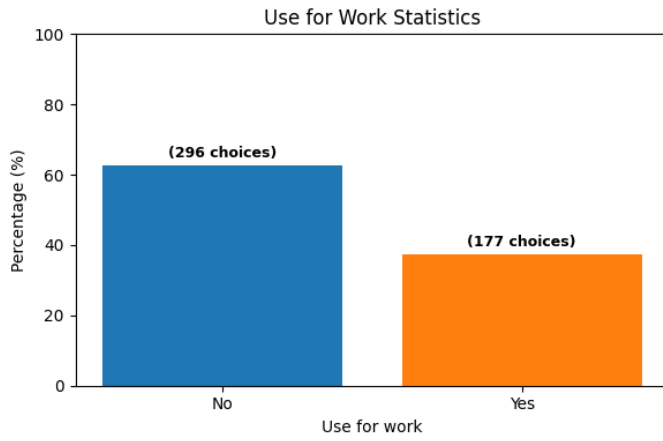
Where do you usually park your vehicles when you're at home? *Respondents who indicated they owned or had access to a vehicle were asked this question.*
(457 responses)



Parking Location	Primary Vehicle	Second Vehicle	Third Vehicle
In a garage or on a driveway	26.26%	32.47%	23.26%
In a shared private car park	4.81%	5.84%	6.98%
On-street	68.49%	45.45%	20.93%
Elsewhere	0.44%	4.55%	6.98%

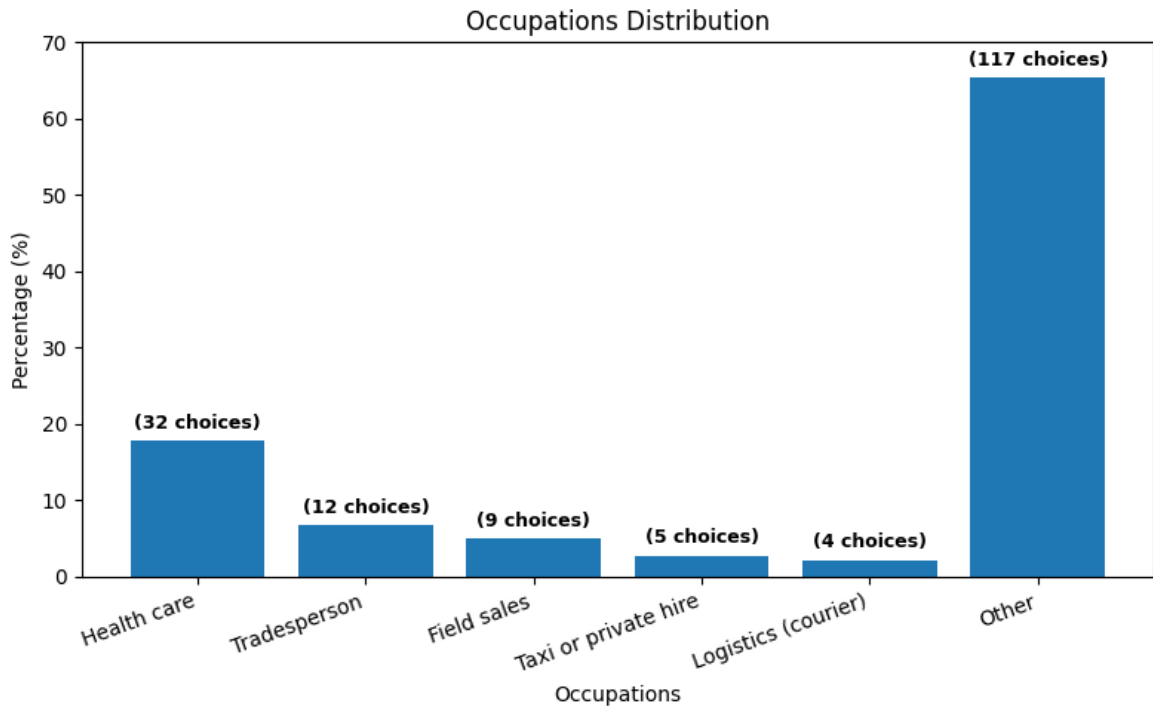
Using your vehicle for work

Do you use any of your vehicles for work? Respondents who indicated they owned or had access to a vehicle were asked this question.
(473 response)



Use for work	Total
No	62.6% (296 choices)
Yes	37.4% (177 choices)

What do you do for work? Respondents who indicated they used their vehicle for work were asked this question.
 (179 responses)



Occupations	Total
Health care	17.9% (32 choices)
Tradesperson	6.7% (12 choices)
Field sales	5.0% (9 choices)
Taxi or private hire	2.8% (5 choices)
Logistics (courier)	2.2% (4 choices)
Other	65.4% (117 choices)

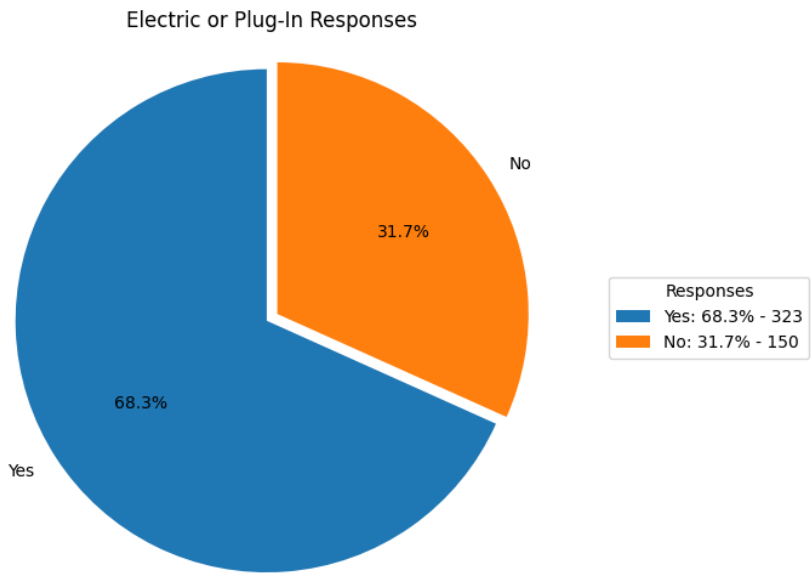
Comments added alongside the ‘Other’ option:

Category	Occupations	Count
Various	Self employed, Events and PR, Commuting x 6, Enterprise Car Club, Run an affordable food scheme, Field work in South East, office, Food safety, Property owner, Ecologist & Opthamologist, National park manager, Entertainment, , Travel to meetings x 4, Design, Housing officer, Wedding chauffeur, Highway inspector, Cabin crew, Retail and workshop, Freelance, I.T, Construction admin, Marketing manager, Professional services, Ecologist, Marketing manager, Scientific research, Professional, Freelance book pickups and roleplay	36
Business/Management	Charity Director, Business owner, Company Manager, Director, Managing Director of an ecological consultancy, shop owner, Demand planner, National accounts manager, Business owner, Director, IT Director, Own Business, Company Director, Retail director	14
IT/Technology	Designer - visiting suppliers/clients, Going to meetings with Clients, POS support, Southern Water for travelling to treatment sites, IT Support and Design, IT Architecture, Multi-site visits, Traveling between sites, IT MANAGER, Drone roof surveys and security observations, attending sites	11
Local Government	Local Government x 5, Council, Commissioning Officer for BHCC, Local authorities, civil servant, BHCC Adult Social Care, Council officer visiting properties	11
Engineering	Engineer x 2, Test engineer, Engineer / Consultant, Electrical engineer, Technical director, Senior Electrical Engineer, Design engineer x 2	9
Education	Teacher x 3, Maintenance, Porterage, Catering, Educational professional x 2, Yoga teacher	7
Consultancy	Consultant x 4, Freelance Consultant, Leadership consultant, Executive coach	7
Creative/Media	Videographer, Creative Director in the advertising industry, Photographer, Freelancer in Film and TV industry, musician, Television production	6
Legal/Finance	Legal, Finance Director, Financial Adviser, Finance, Lawyer	5
Health/Social Care	Social Care, Independent Social Worker, Health Care	3

Respondents come from a wide range of professional backgrounds, including local government, consultancy, engineering, education, health and social care, property, business ownership, and technical roles. This highlights the importance of an expanded and accessible electric vehicle charging network to support a diverse workforce with varying travel demands.

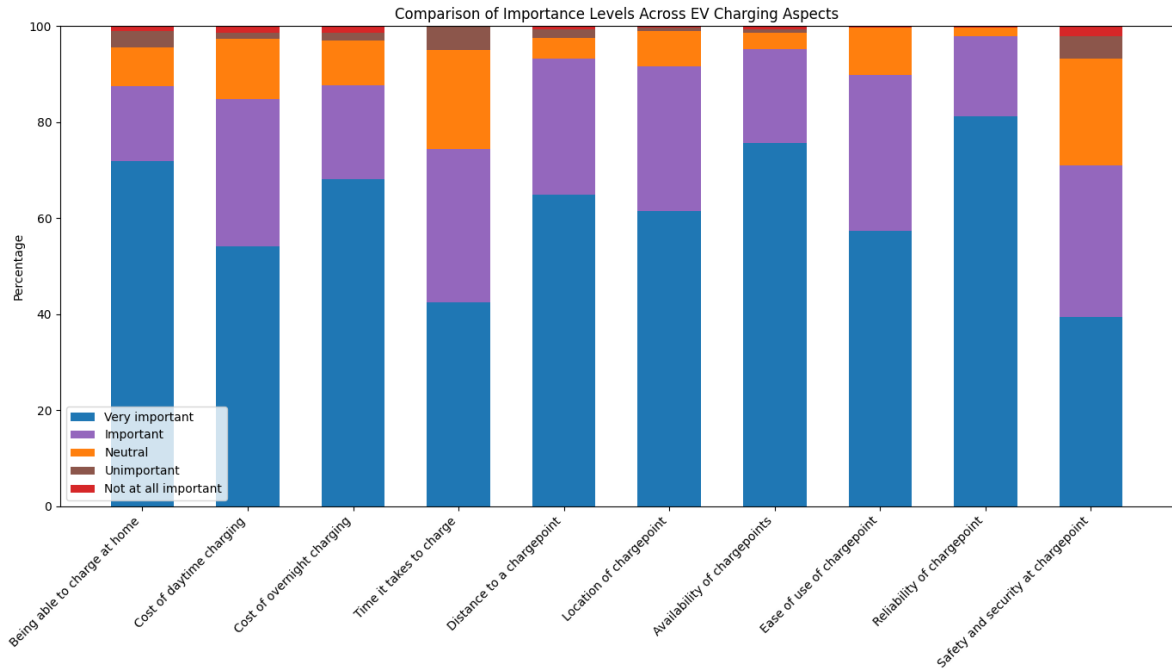
Types of vehicles

Are any of your vehicles electric or plug-in hybrid? *All respondents who indicated they had a vehicle where asked this question*
 (473 responses)



Electric or Plug-In	Total
Yes	68.3% (323 choices)
No	31.7% (150 choices)

When thinking about charging your vehicle, how important are the following?
All respondents who indicated they had an electric vehicle or plug-in hybrid were asked this question.
 (323 responses)



Factor	Very Important	Important	Neutral	Unimportant	Not at all Important
Being able to charge at home	71.9%	15.6%	8.0%	3.5%	1.0%
The cost of daytime charging	54.2%	30.5%	12.7%	1.3%	1.3%
The cost of overnight charging	68.1%	19.5%	9.5%	1.6%	1.3%
The time it takes to charge	42.4%	32.0%	20.5%	5.1%	0%
Distance to a chargepoint	64.9%	28.4%	4.4%	1.7%	0.7%
Location of chargepoint	61.5%	30.2%	7.3%	0.7%	0.4%
Availability of chargepoints	75.7%	19.5%	3.4%	0.7%	0.7%
Ease of use of the chargepoint	57.4%	32.4%	9.9%	0%	0.4%
Reliability of the chargepoint	81.2%	16.7%	1.7%	0%	0.4%

Safety and security at the chargepoint	39.4%	31.6%	22.3%	4.6%	2.1%
--	-------	-------	-------	------	------

Responses above highlight that EV users place the highest importance on chargepoint reliability, availability, and the ability to charge at home, with cost and convenience also playing key roles in shaping charging preferences.

If there is another aspect of vehicle charging that is important to you, please tell us more about this? *All respondents who indicated they had an electric vehicle or plug-in hybrid were asked this question*

Respondents filled in this section with free text comments. Verbatim comments below:

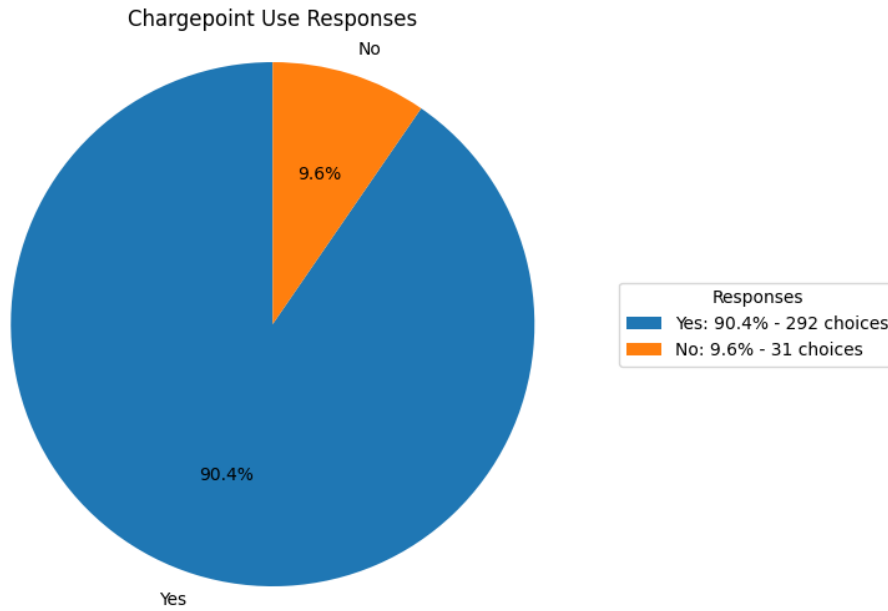
Theme	Feedback	Count
App Usability	Whether you can use it via octopus Electroverse, or whether you need a separate app for each CPO That the app actually works	2
Availability	It would be great to have more lamp post chargers in the streets so charging is possible overnight. There is a EV lamp charging point in my street but unfortunately 90 % of the time it has a non EV car parked in it. I am aware that the council are planning to install more which is great. More chargers in Hangleton Charging points completely lacking in my street despite requesting. This is very disappointing and frustrating There are hardly any charge point for use in Coldean, seems like this suburb had been forgotten again, no where to speed charge and only 1 lamppost point that has no marked bay so has fuel cars in 24 hrs	4
Bay Access	Ensuring that none EV's are ticketed in charging bays. EV charging bays should be marked for EV use only; currently, Brighton & Hove council has created many shared EV charging + resident bays, which means residents without EVs take the space, thereby reducing the number of useable chargers. This is illogical and frustrates the EV user, making them less likely to advocate for other people to adopt EVs. Dedicated available spaces That the space for charging isn't blocked by non-charging cars On street charge points not being blocked by non-electric vehicles very frustrating when all chargers have non EVs blocking the bays because they're not reserved	6
Cost	Overnight charging rates - in Shoreham you can charge for about half the cost by charging in overnight. Cost of charging and being able to access the charger when I need	6

	<p>it (my nearest is usually occupied) Cost Price I think the VAT that is charged on public chargers, should be scrapped (Christopher Chope MP's private members' bill) I live in a flat so I cannot charge from my household electrical supply. I would particularly like access to an over-night slow charger. We are very heavily penalized living in a flat because the cost of on street charging is so high, the system is too biased toward home owners that can take advantage of cheap overnight charging</p>	
Home Charging	<p>Cross pavement charging / cable gully Ability to charge at home, cross-pavement Being able to charge from home electricity supply for a cheap price. I have an EV charger at home which is very cheap to run overnight, but often can't use it because of on-street parking. A Kerbocharge channel in the pavement would be very helpful to run the cable over the pavement safely Want to be able to have a charge point in my house and run cable across pavement to car parked on street outside Living in Brighton I would hope only to need to charge at home which is most convenient and cheapest rather than at a public charge point Cost is my primary concern. If I had a driveway it would be 7p per kWh. I am forced to use Blink at a minimum of 54p per kWh. i.e. 700% penalty for not having a driveway and fuel as expensive as diesel The cost of charging a vehicle without a home charging point, is more expensive than running a petrol vehicle. My employer has an all electric lease vehicle policy. We are trained in their use and without a home charger a petrol car is cheaper. Also, you cannot put an electric charge point on a council property. Charging at home As a hybrid owner, we acutely aware that petrol is 15p a KWH and the public charging grid is 50p KWH. It has to be cheaper to use electricity more. Also residents should get free parking when charging all over town. Also there needs to be some protocol that allows people to charge in front of their own homes. Electric resident priority places for example.</p>	10
Reliability	<p>I want them to work 1st time without having to call Blink, who never answer the phone straightaway. RFID cards are the most convenient, not the app. The app is a hassle and normally the charger does not work allocated EV parking, reliability, app, VAT Reliable available local charging points Having reliable assistance when Blink app doesn't function or there is a fault at the charging point I really dislike using blink as it's often impossible to charge. the stations are broken or the app doesn't work or the service team are uses less. Reliability of chargers - so many do not work when you get to them and this leaves you without charge and having to go to a less convenient location to charge</p>	6

Other	Something to do whilst charging Easy Access is most important	2
-------	---	---

Charging your vehicle

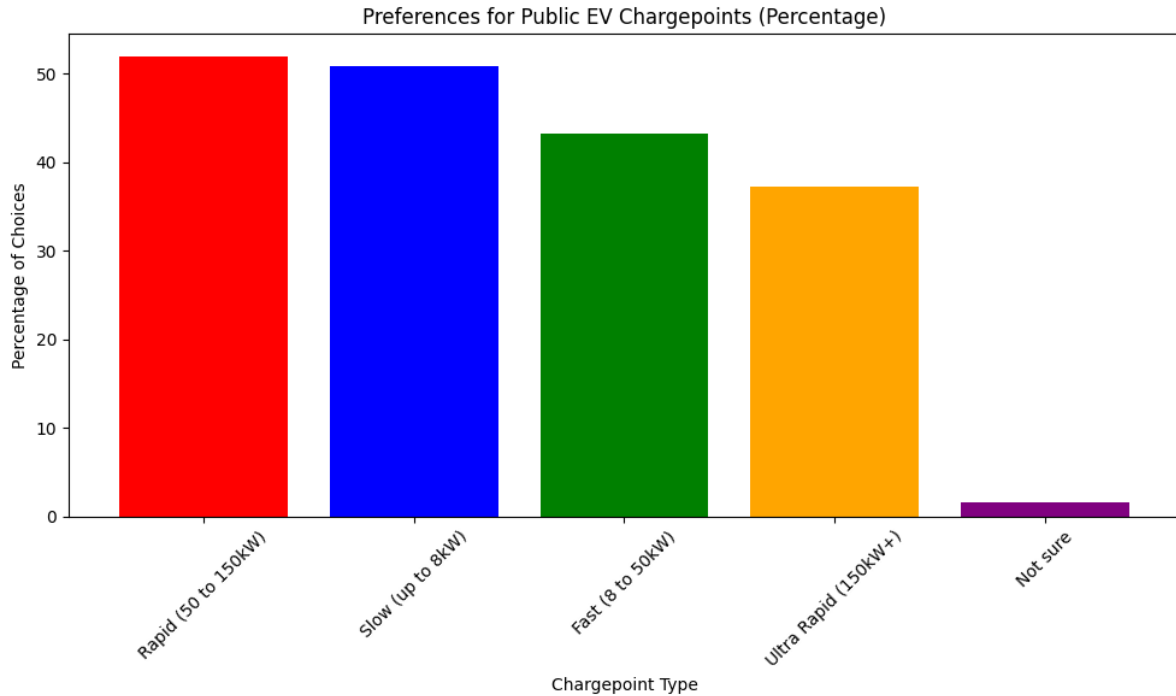
Do you ever use a public chargepoint? *All respondents who indicated they had an electric vehicle or plug-in hybrid were asked this question.*
(323 responses)



Chargepoint Use	Total
Yes	90.4% (292 choices)
No	9.6% (31 choices)

What type of public chargepoint would you be more likely to use? *All respondents who indicated they had an electric vehicle or plug-in hybrid were asked this question.*

Multiple choice
(321 responses)

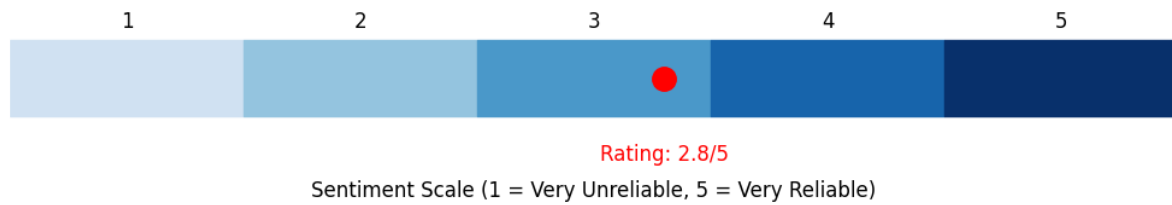


Chargepoint Type Use	Total
Rapid (50 to 150kW)	33.1% (167 choices)
Slow (up to 8kW)	32.5% (164 choices)
Fast (8 to 50kW)	27.5% (139 choices)
Ultra Rapid (150kW+)	23.8% (120 choices)
Not sure	1% (5 choices)

How reliable have you found public on-street chargepoints in Brighton & Hove to be? *All respondents who indicated they had an electric vehicle or plug-in hybrid were asked this question.*

(285 responses)

Reliability of Public On-Street Chargepoints in Brighton & Hove

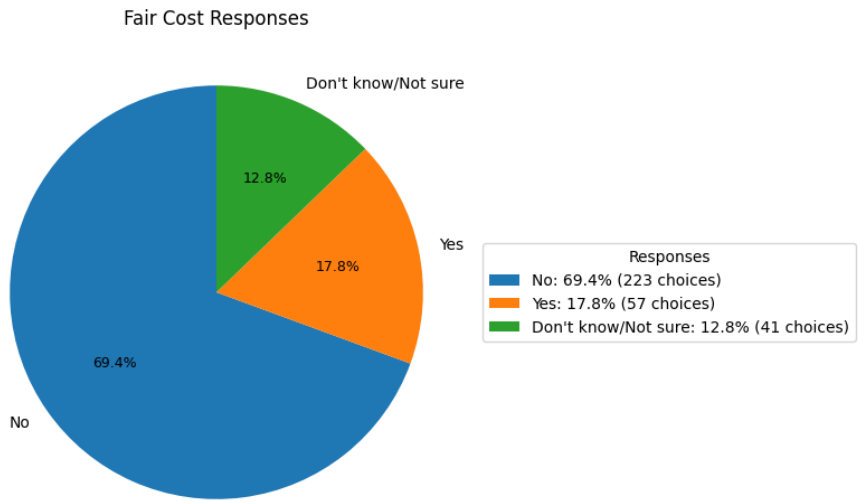


Participants gave an average score of 2.8 out of 5 for reliability of the current charging network run by Blink Charging.

Score	Comment	% selected
1	Not very reliable	14%
2	Unreliable	28%
3	It's fine	28%
4	Fairly reliable	24%
5	Very reliable	5%

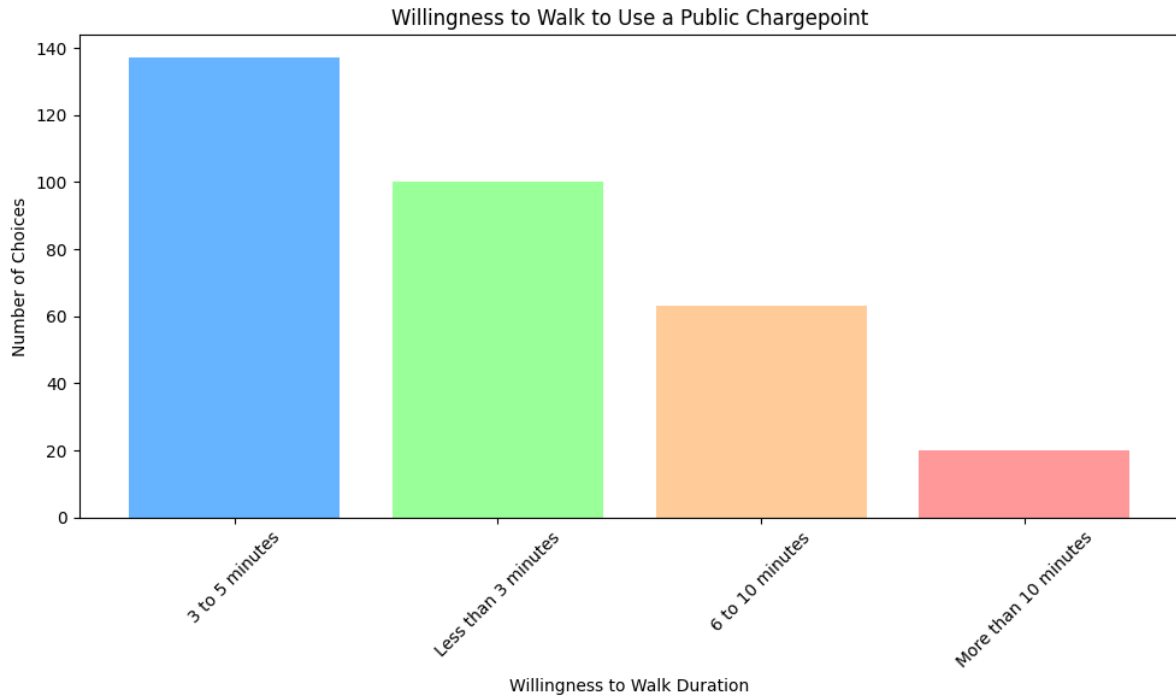
Verbatim comments can be found in the attached document - [EV Survey Appendix - How reliable have you found public on-street chargepoints in Brighton and Hove to be](#)

Do you think the cost of using public chargepoints is fair? *All respondents who indicated they had an electric vehicle or plug-in hybrid were asked this question.*
 (321 responses)



Fair cost	Total
No	69.4% (223 choices)
Yes	17.8% (57 choices)
Don't know/ not sure	12.8% (41 choices)

How long would you be willing to walk to use a public chargepoint? *All respondents who indicated they had an electric vehicle or plug-in hybrid were asked this question. (320 responses)*

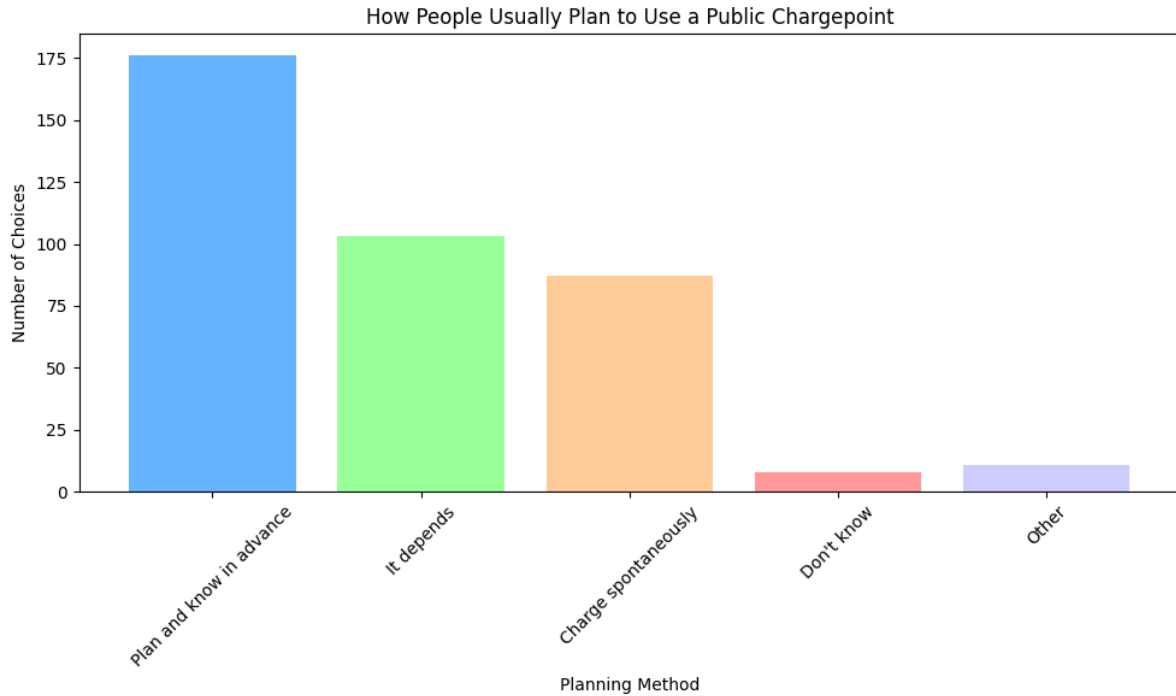


Walking distance	Total
3 to 5 minutes	42.8% (137 choices)
Less than 3 minutes	31.3% (100 choices)
6 to 10 minutes	19.6% (63 choices)
more than 10 minutes	6.3% (20 choices)

How do you usually plan to use a public chargepoint? All respondents who indicated they had an electric vehicle or plug-in hybrid were asked this question.

Multiple choice

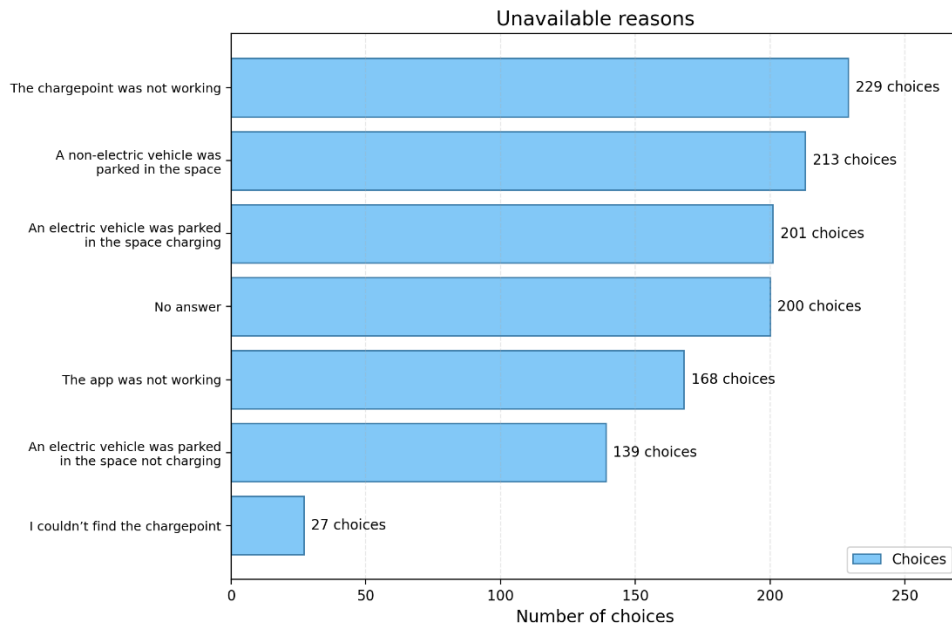
(318 responses)



Plan	Total
I plan and know in advance where I am going to charge	34.9% (176 choices)
It depends	20.4% (103 choices)
I charge spontaneously and locate a chargepoint when needed	17.2% (87 choices)
Don't know	1.6% (8 choices)
Other	2.2% (11 choices)

If you've ever found you couldn't access a chargepoint, which of the following apply? All respondents who indicated they had an electric vehicle or plug-in hybrid were asked this question.

Multiple choice
(305 responses)

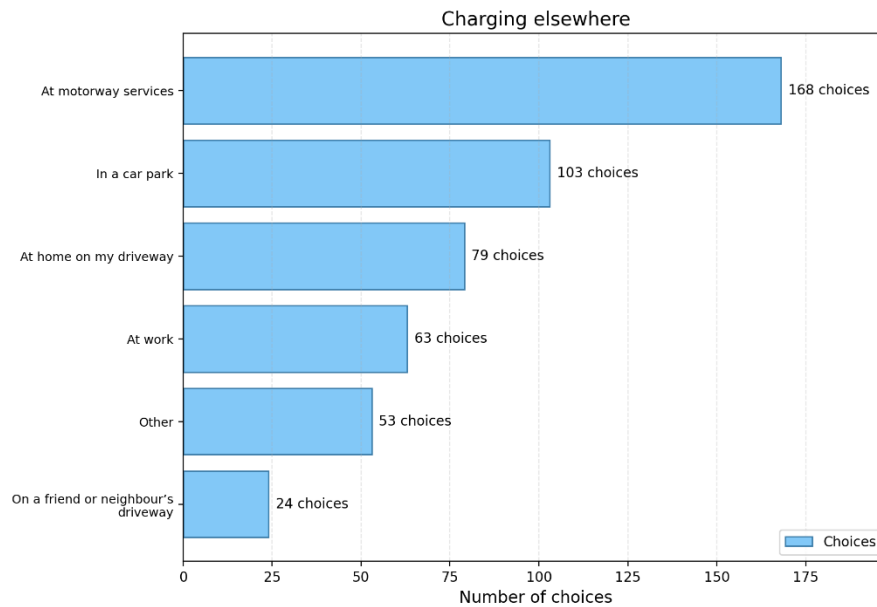


Unavailable reasons	Total
The chargepoint was not working	45.3% (229 choices)
A non-electric vehicle was parked in the space	42.2% (213 choices)
An electric vehicle was parked in the space charging	39.8% (201 choices)
No answer	39.6% (200 choices)
The app was not working	33.3% (168 choices)
An electric vehicle was parked in the space not charging	27.5% (139 choices)
I couldn't find the chargepoint	5.3% (27 choices)

Where else do you charge your vehicle? *All respondents who indicated they had an electric vehicle or plug-in hybrid were asked this question.*

Multiple choice

(296 responses)

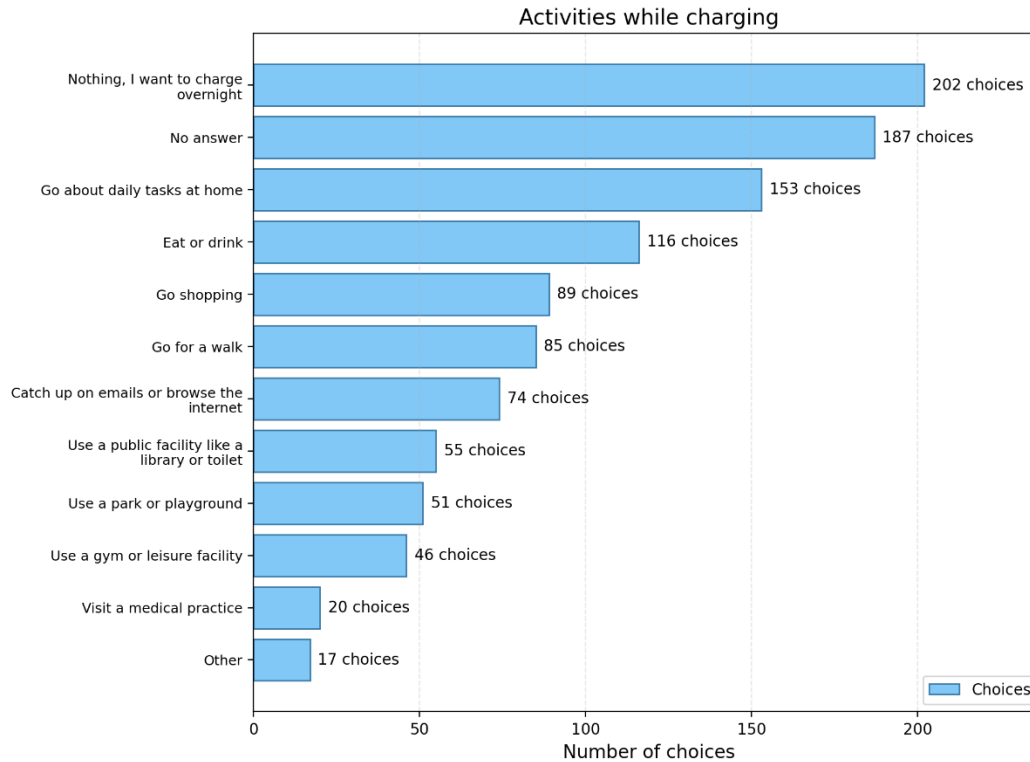


Charging elsewhere	Total
At motorway services	56.7% (168 choices)
In a car park	34.8% (103 choices)
At home on my driveway	26.7% (79 choices)
At work	21.3% (63 choices)
On a friend or neighbour's driveway	8.1% (24 choices)
Other	17.9% (53 choices)

Activities while charging

What do you ideally want to do while charging your electric vehicle? *All respondents who indicated they had an electric vehicle or plug-in hybrid were asked this question.*

*Multiple choice
(318 responses)*



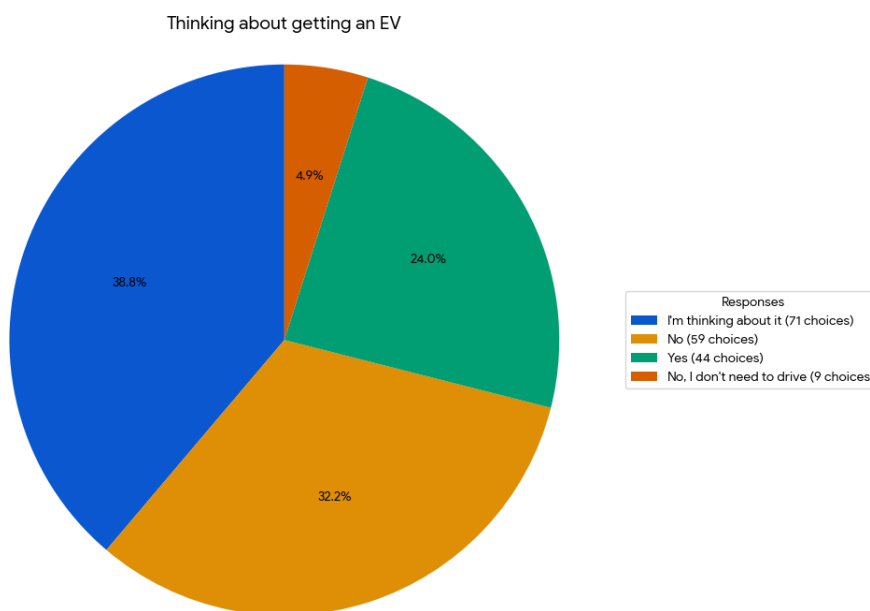
Activities while charging	Total
Nothing, I want to charge overnight	40% (202 choices)
No answer	37% (187 choices)
Go about daily tasks at home	30.3% (153 choices)
Eat or drink	23% (116 choices)
Go shopping	17.6% (89 choices)
Go for a walk	16.8% (85 choices)
Catch up on emails or browse the internet	14.7% (74 choices)
Use a public facility like a library or toilet	10.9% (55 choices)
Use a park or playground	10.1% (51 choices)
Use a gym or leisure facility	9.1% (46 choices)

Visit a medical practice	4% (20 choices)
Other	3.4% (17 choices)

The majority of participants indicate they prefer to charge their vehicle overnight, while many others would like to continue with daily tasks at home during charging. People also expressed interest in combining charging with activities such as eating or drinking, shopping and walking.

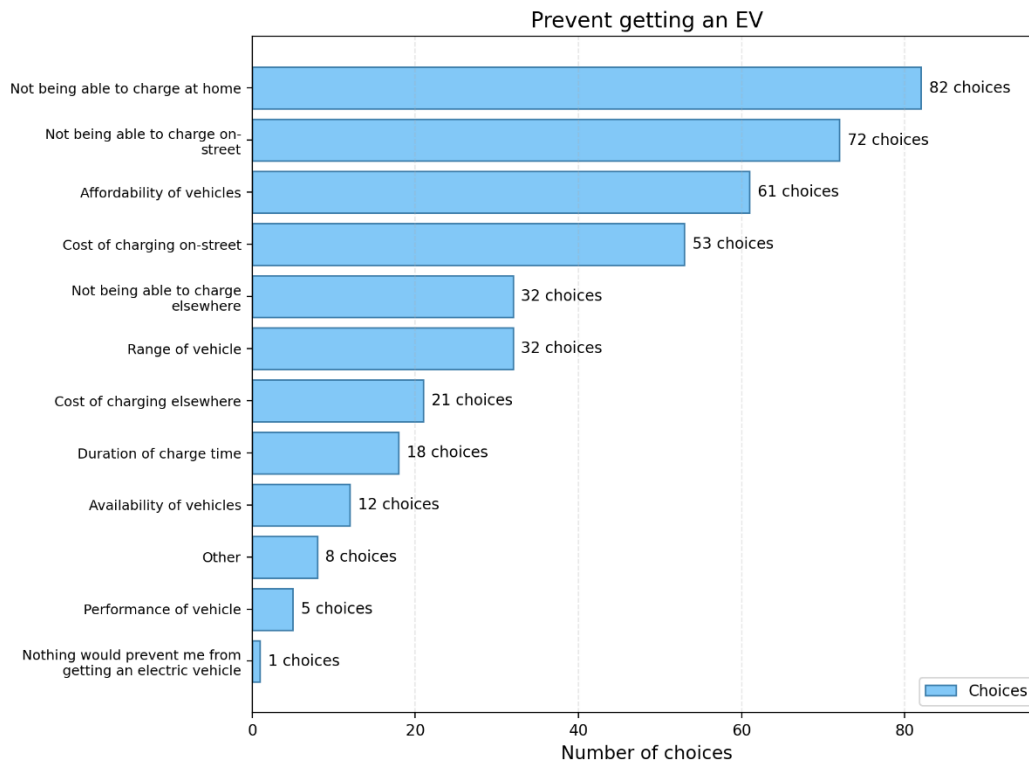
Switching to an electric vehicle

Are you thinking about getting an electric vehicle? *All respondents who indicated they did not own an electric vehicle earlier in the survey were asked this question*
(183 responses)



Getting an EV	Total
I'm thinking about it	38.8% (71 choices)
No	32.2% (59 choices)
Yes	24.0% (44 choices)
No, I don't need to drive	5% (9 choices)

What might prevent you from switching to an electric vehicle? *All respondents who answered yes or that they were thinking about getting an electric vehicle were asked this question.*
Multiple choice
(116 responses)



Prevent getting an EV	Total
Not being able to charge at home	70.7% (82 choices)
Not being able to charge on-street	62.1% (72 choices)
Affordability of vehicles	52.6% (61 choices)
Cost of charging on-street	45.7% (53 choices)
Not being able to charge elsewhere	27.6% (32 choices)
Range of vehicle	27.6% (32 choices)
Cost of charging elsewhere	18.1% (21 choices)
Duration of charge time	15.5% (18 choices)
Availability of vehicles	10.3% (12 choices)
Performance of vehicle	4.3% (5 choices)
Nothing would prevent me from getting an electric vehicle	0.9% (1 choice)
Other	6.9% (8 choices)

The most common concerns preventing residents from switching to an electric vehicle are the lack of home charging options and limited on-street charging availability. Over half of respondents also cited the affordability of vehicles as a barrier, while costs associated with on-street charging were a concern.

Expanding the charging network

If you have any thoughts or suggestions about the number of chargepoints being installed, could you please share them with us? *All respondents who answered yes or that they were thinking about getting an electric vehicle were asked this question*

Verbatim comments can be found in the attached document [Thoughts or suggestions about the number of chargepoints being installed - verbatim comments](#)

Please use the map to tell us where you think we should locate chargepoints

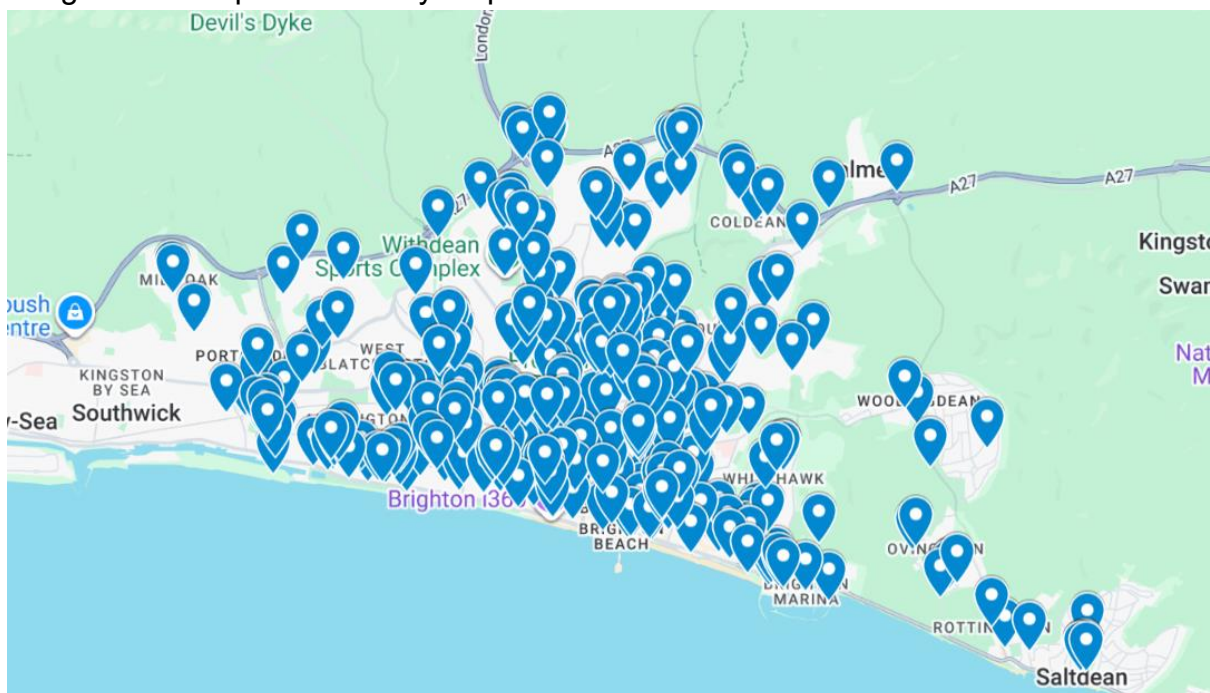
All respondents who answered yes or that they were thinking about getting an electric vehicle were asked this question

We provided you with the opportunity to drop pins on the map of Brighton & Hove as way of suggesting locations for chargepoints to be installed. We had a total of 373 pins added and a further 177 manually typed locations.

The locations identified have been shared with our CPOs, alongside our live resident request list. These locations will now undergo a detailed review by the CPOs to assess their viability for deployment.

The locations provided span across Brighton & Hove, reaching from Portslade in the west to Saltdean in the east, and extending northwards to Coldean and Patcham. We sincerely appreciate this valuable input as we work to ensure our EV infrastructure meets the diverse needs of communities throughout the city.

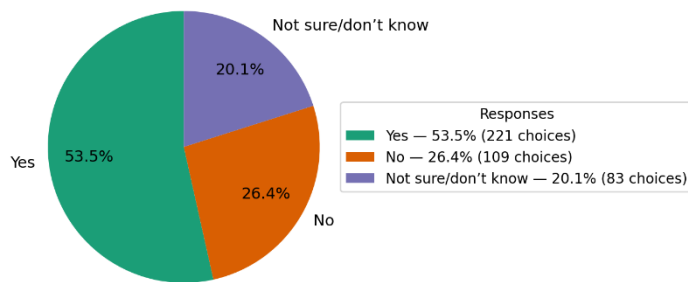
Image of all the pins added by respondents



Would you be interested in using a cross-pavement charging gully to charge your vehicle outside your home? *All respondents who confirmed they had an EV, plug in hybrid or answered yes or that they were thinking about getting an electric vehicle were asked this question*

(413 responses)

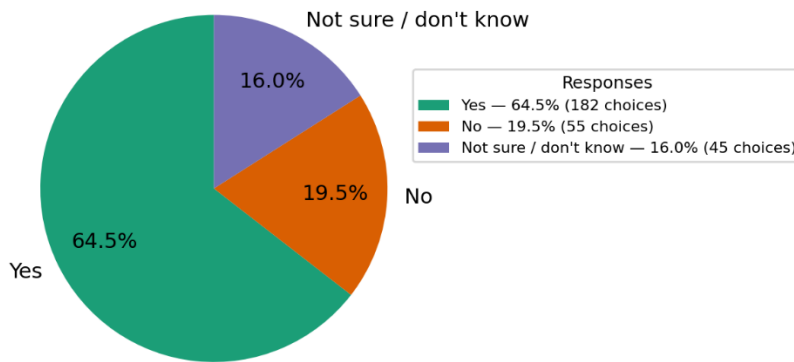
Using cross-pavement charging



Using cross-pavement charging	Total
Yes	53.5% (221 choices)
No	26.4% (109 choices)
Not sure/don't know	20.1% (83 choices)

Would you support the installation of cross-pavement charging gullies in Brighton & Hove? Respondents who answered no or no, I don't need to drive, to the question 'Are you thinking about getting an electric vehicle' AND respondents who answered not sure/don't know to being interested in using a charging gully were asked this question. (282 responses)

Supporting cross-pavement charging



Supporting cross-pavement charging	Total
Yes	64.5% (182 choices)
No	19.5% (55 choices)
Not sure / don't know	16.0% (45 choices)

Do you have any other comments about cross-pavement charging gullies?

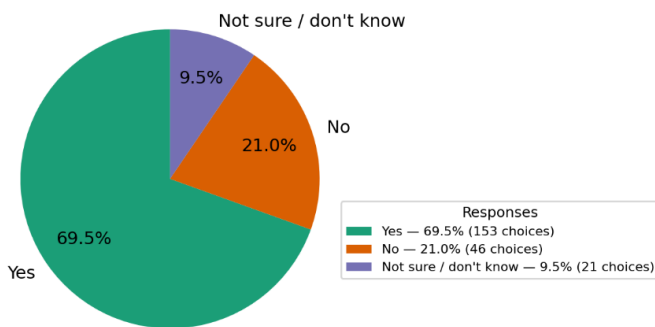
Respondents who answered no or no, I don't need to drive, to the question 'Are you thinking about getting an electric vehicle' AND respondents who answered not sure/don't know to being interested in using a charging gully above, were asked this question.

Verbatim comments can be found in the attached document [Cross-pavement charging gullies respondent comments](#)

Would you be interested in sharing your chargepoint with other electric vehicle drivers if you were reimbursed for electricity?

Respondents who answered yes to being interested in using a cross-pavement charging gully were asked this question. (220 responses)

Sharing your chargepoint



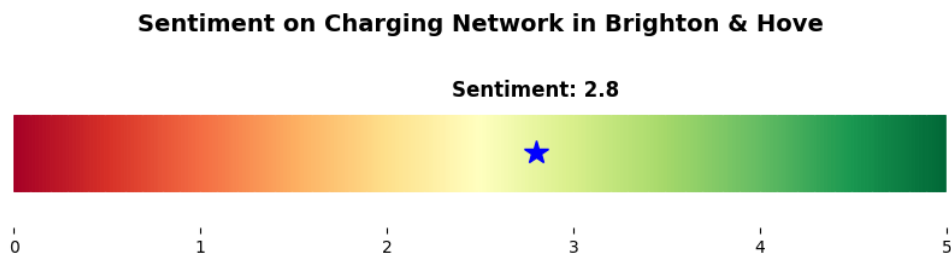
Sharing your chargepoint	Total
Yes	69.5% (153 choices)
No	21.0% (46 choices)
Not sure / don't know	9.5% (21 choices)

Do you have any other comments about cross-pavement charging gullies?

Respondents who answered yes to being interested in using a cross-pavement charging gully were asked this question.

Verbatim comments can be found in the attached document [Cross-pavement charging gullies respondent comments continued](#)

How do you feel about the charging network in Brighton & Hove? All respondents were asked this question (466 responses)



Participants gave a score of 2.8 out of 5 on how they felt about the charging network in Brighton & Hove. The highest selected score was 'It's Okay' (3 out of 5) at 47%, followed by 'It's bad' (2 out of 3) at 23%.

Score	Comment	% selected
1	It's really bad	9%
2	It's bad	23%
3	It's okay	47%
4	It's good	17%
5	It's really good	4%

Verbatim comments can be found in the attached document [How do you feel about the charging network in Brighton & Hove](#)

Stakeholder and local businesses comments

9 responses were received from local businesses and stakeholders. Answers and comments have been fed into the survey above. Specific comments or issues raised by businesses and organisations are also summarised here.

Local businesses - Shared concerns about cross-pavement charging gullies as believes there are already enough charging points and that this solution will remove further parking and create pedestrian hazards (especially for disabled users). Feels there could be an increase in accidents with cables and busy pavements. Other local businesses were in favour of official cross-pavement cable gullies. Unfair disparity between public charging pricing and home tariffs also mentioned.

Car clubs - Supports electrification of the car club network. Typical charging use involves downtime (eat/drink, emails). Uses a mix of slow/fast/rapid/ultra-rapid chargers and highlights reliability/access issues like non-EVs blocking bays.

Community schemes - Access problems were mentioned with chargers often blocked by parked cars not charging and the need for more dedicated EV bays, as well as app improvements. More chargers at community venues (community centres, GP surgeries) and attention to inclusion in more deprived areas. Supports gullies in principle but cost is a barrier. Also a request that focus should be on affordability of on-street charging (closer to domestic tariffs) or fast-track cross-pavement solutions for safe kerbside home charging. On the flip side one stakeholder group asked that cross-pavement gullies do not obstruct blind/partially-sighted pedestrians and pavement surfaces must be clear of cables or raised covers.

Local resident groups - Would like chargers at local community halls as part of wider decarbonisation, plus community car club and volunteer transport for vulnerable residents. Interested in V2G developments. Supports cross-pavement gullies but emphasises reducing private car dependence and promoting public transport.

Schools/Colleges - Several electric pool cars and vans; typical charging downtime used for admin (emails). Supports cross-pavement gullies; currently uses workplace and car-park charging.

Cycling - Cycling stakeholder groups warn EV infrastructure can block valuable kerbside space, complicate future schemes (e.g., cycle lanes), and that modal shift, not EVs alone, is necessary to meet carbon goals. Also have concern over larger/heavier EVs impact on safety and space.

Summary

There were consistent themes throughout the survey and below some of these themes have been addressed.

Cost of public charging - While we know VAT plays a significant part in this additional cost to public charging, the new partnerships with 3 CPOs will bring competition to the city's charging options, bringing costs down and new day and night tariffs.

Blocked bays - With our plans to roll out thousands of chargepoints, beginning with 1650 over the next 3 years, we hope this will tackle the issue of blocked chargepoints, however, we will continue to review locations that would benefit from being changed to EV only. This is a longer process as requires a Traffic Regulation Order (TRO) to change the restrictions on street. This means a consultation must take place.

A demand for different charging speeds - The new contracts we have signed will see a mix of slow lamp column mounted, Fast and Rapid (some Ultra Rapid) chargepoints installed across the city and these will be placed strategically, so users get the ideal charging power for their needs. This will include rapid charging hubs.

Cross pavement solutions – There were some concerns shown over the cost quoted in the survey (£2000-£3000). For clarification this included the cost of the home charger the resident would need to purchase also, not solely the gully and the digging of the trench. The government have recently announced funding for cross pavement solutions and the Department for Transport (DfT) set a deadline of 30th October 2025 for councils to submit an expression of interest for funding to support cross-pavement electric vehicle (EV) charging solutions. Following submission, the DfT will review applications and aims to allocate funding to successful councils by 31st March 2026, the end of the current financial year. The council have submitted an application and are waiting for the DfT's response to see if we have been successful. Once the outcome of the DfT's review is known, officers will present a report to Cabinet in Spring 2026. This report will include a recommendation on how the city should proceed with cross-pavement EV charging. It is important to note that cross pavement gullies may not suit every resident and location, therefore our current focus is the expansion of the public chargepoint network.

Responses to sections such as activities people like to do while charging and barriers to switching to an EV are great insights and will help the council shape future accessible charging infrastructure to better suit the needs and routines of resident, visitors and local businesses, ensuring we put the right type of chargers in the right locations. As part of the contracts with our CPOs, their commitment to accessibility and compliance with PAS 1899 was a key part of the tender evaluation. They have demonstrated this through detailed implementation plans, inclusive

design features, and ongoing engagement with accessibility standards. We will also use the concerns raised to tailor our updates to tackle myths around vehicle costs and range anxiety.

The majority of participants agreed that more chargepoints were needed, especially in residential areas and locations without off-street parking. There was a thought that the current provision is not keeping pace with rising EV ownership and demand. The council agrees and that is why we have plans to add thousands of chargepoints to the 500+ we already have in the city. There were mentions of areas of the city with little or no charging infrastructure and this new LEVI funded project will see us address that inequity with our objective being to provide a chargepoint within a short walk of all households with no off-street parking, with also the ambition in years to come to have chargepoints on all suitable lamp columns on every street in Brighton & Hove.

Overall, the above plans include the significant increase in chargepoint numbers, partnering with two new CPOs to bring competition, share best practices and reduce costs, apply for cross pavement solution funding and ensure all 3 CPOs have accessibility (PAS 1889 guidance) as a key factor in their designs and site selection.

Overall, there is strong support for expanding the network quickly and making it more affordable and accessible.

Demographic information

Do you want to answer the following equalities monitoring questions?

(505/505 responses)

Option	Choices
Yes	280
No	225

What is your age?

(278/505 responses)

Option	Choices
55 to 64	90
45 to 54	83
35 to 44	42
65 to 74	37
25 to 34	12
75 to 84	9
16 to 24	2
85 plus	2
Prefer not to say	1

Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months?

(279/505 responses)

Option	Choices
No	226
Yes, a little	25
Yes, a lot	23
Prefer not to say	5

Do any of your conditions or illnesses reduce your ability to carry out day to day activities? *Multiple choice*

(47/505 responses)

Option	Choices
Long-standing Illness	26
Physical Impairment	22
Autistic Spectrum	10
Mental Health Condition	9
Learning Disability / Difficulty	6

Sensory Impairment	6
Developmental Condition	4
Prefer not to say	4
Other	4

What best describes your sex and gender?

(276/505 responses)

Option	Choices
Male	183
Female	78
Prefer not to say	10
Non-binary	4
Intersex	0
Other, please describe	1

Is the gender you identify with the same as your sex registered at birth?

(278/505 responses)

Option	Choices
Yes	267
Prefer not to say	8
No	3

How would you describe your ethnic origin?

(276/505 responses)

Option	Choices
Asian / Asian British: Bangladeshi	0
Asian / Asian British: Pakistani	0
White: Gypsy or Irish Traveller	0
Asian / Asian British: Other (please share details below)	0
Black / Black British: Caribbean	0
Black / Black British: Other (please share details below)	0
Mixed: Black African and White	0
Asian / Asian British: Chinese	1
Other Ethnic Group: Arab	1
Black / Black British: African	1
Asian / Asian British: Indian	2
Mixed: Black Caribbean and White	2
Mixed: Asian and White	4
White: Irish	4

Mixed: Any other mixed / multiple ethnic background	5
Prefer not to say	5
White: Other	32
White: English, Welsh, Scottish, Northern Irish, British	217
Other ethnic group, please describe	2

Brighton & Hove City Council

Cabinet

Agenda Item 185

Subject: Investing in subsidised bus travel

Date of meeting: Thursday, 14 May 2026

Report of: Cabinet Member for Transport & City Infrastructure

Lead Officer: Name: Corporate Director- Operations

Contact Officer: Name: Paul Nicholls

Email: paul.nicholls@brighton-hove.gov.uk

Ward(s) affected: (All Wards);

Key Decision: Yes

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

For general release

1. Purpose of the report and policy context

1.1 This report updates Cabinet on negotiations with bus operators in the city for fixed deals to cover the cost of concessionary fare journeys made by eligible older persons and disabled concessionary pass holders for 2026-27. The Council is investing an additional £1.5m in providing free bus travel to aged and disabled bus pass holders. This includes free bus travel outside of the statutory minimum hours of the scheme.

1.2 The policies which this report seek to promote are:

- promote and improve health and wellbeing, to reduce health inequalities, and to support people to live independent and fulfilling lives.
- a city to be proud of making it easier to move around the city.

2. Recommendations

2.1 Cabinet notes the progress of negotiations on concessionary fares payments with bus operators and agrees to the payment of the fixed deals as set out in Part 2 of this report.

2.2 Cabinet confirms the delegated authority granted to the Corporate Director City Operations on 20 March 2025 to conduct and conclude negotiations with all bus operators for the reimbursement of concessionary fares so that expenditure is less than would be otherwise be calculated using the new DfT Calculator.

3. Context and background information

- 3.1 The Council has a statutory duty to reimburse bus operators for Concessionary Travel undertaken by older people and eligible disabled pass holders. There are over 42,000 pass holders in Brighton & Hove of which 7,000 are issued to qualifying disabled residents
- 3.2 In November 2023 the DfT produced guidance on the new DfT Calculator to calculate concessionary fares reimbursement to bus operators. Use of the new DfT calculator is not mandatory as the Council is still able to enter into fixed deal arrangements provided that both parties can agree on an annual sum to be paid for concessionary fares on the principle of 'no better or worse off'.
- 3.3 On 20 March 2025 Cabinet agreed to the use of negotiated fixed deals as the preferred option for the next 3 years with all bus operators for the reimbursement of concessionary fares and granted delegated authority to the Corporate Director for City Services to conduct and conclude such negotiations so that expenditure is less than would otherwise be calculated using the new DfT calculator.
- 3.4 In 2025/26, concessionary travel costs for Brighton & Hove buses were around £10m. This was significantly reduced by our agreement to direct a substantial amount of BSIP grant funding into express bus services over two financial years
- 3.5 Under the revised Government formula, costs for 26/27 could have increased to between £12.0m and £12.5m. Instead, we have negotiated a fixed deal for 2026/27 of approximately £11.3m with Brighton & Hove Buses, subject to approval. Without a fixed deal, payments would automatically default to the Government formula based on passenger journeys. Our data analysis suggests this would be around £12.0m, while the bus operators estimate it would be closer to £12.5m. The negotiation has involved some additional funding going into express bus services while also ensuring we focus on bus priority feasibility studies in key areas such as Woodingdean in 2026-27.
- 3.6 Concessionary passenger numbers have increased by up to 16% this year following a rise of up to 10% last year adding to budgetary pressures. The council issues 2,500 new older passes annually. This number is expected to halve over the next two years due to the phased increase in the state pension age from 66 to 67 from April 2026.
- 3.7 The Council's concessionary fares scheme operates for additional hours compared to the statutory scheme. The Council continues to fund these discretionary elements to support disabled users and older people beyond the statutory requirements. This requires approximately £0.2m of additional funding which would have otherwise reduced the costs of the fixed deal. The additional hours are as follows:

	Weekdays	Weekends and bank holidays
Statutory minimum scheme hours	9.30am to 11pm	All day
Brighton & Hove – Disabled	All day	All day
Brighton & Hove – Older Persons	9am to 3:59am	All day

4. Analysis and consideration of alternative options

- 4.1 The Council has a statutory duty to reimburse bus operators. The option of paying operators using the DfT calculator rates was considered but discounted for the reasons explained in this report

5. Community engagement and consultation

- 5.1 No consultation was undertaken as part of the Concessionary Fares negotiations.

6. Financial implications

- 6.1 The approved budget for all concessionary fares in 2026/27 is £11.0m. Due to additional cost pressures, there is an estimated forecast pressure of £1.5m within the City Infrastructure budget for 2026/27.
- 6.2 To address this, the forecast budget position for 2026/27 includes £1.5m in savings that Cabinet is asked to note and approve. These measures are:
- £0.1m from extra Bikeshare income following a review of accounting treatment,
 - £0.6m from a budget realignment within parking for a budget previously allocated for borrowing but no longer required
 - £0.2m in potential savings linked to fraud thresholds in concessionary travel contracts, which may reduce payments if triggered.
 - £0.1m from parking staffing underspends due to vacancies early in the year,
 - £0.1m from prudent underspending assumptions in coast protection linked to the beach groynes capital programme,
 - £0.1m from late-night parking enforcement income exceeding MTFS targets after costs,
 - £0.2m from continued over-performance of table and chair income, and
 - £0.1m from flood risk management staffing underspends caused by ongoing vacancies.
- 6.3 Collectively, at this stage these actions are expected to be achievable. These additional savings will be monitored alongside those approved in the budget paper for 2026/27.
- 6.4 This scenario marks a considerable improvement compared to the previously anticipated £2.5 million pressure based on bus operators' estimates. It reflects the effects of fixed contractual arrangements totaling £12.5 million and robust negotiations, especially with Brighton & Hove Bus Company.

Name of finance officer consulted: Craig Garoghan

Date consulted: 24/04/2026

7. Legal implications

- 7.1 The Council operates its concessionary fares scheme in accordance with the Transport Acts 1985 and 2000, the Travel Concession (Eligibility) Act 2002, the Concessionary Bus Travel Act 2007 and the Mandatory Travel Concession (England) Regulations 2011. The provision of a concessionary travel scheme in accordance with the national minimum is a statutory duty. There is discretion for councils to provide a scheme that extends the entitlement of services over and above the national minimum. The statutory framework for travel concessions does not stipulate a minimum or maximum duration for an individual scheme. It is for the travel concession authority (i.e. the Council) to propose a start and end date, and to seek agreement with the bus operator over the length of this term.

Name of lawyer consulted: David Fairfield Date consulted 9/4/2026

8. Risk implications

- 8.1 There is a risk the concessionary passes can be misused to obtain free bus by people other than the passholder. Officers have been working with Brighton & Hove buses to identify misuse and retain cancelled or misused passes.

9. Equalities implications

- 9.1 Concessionary travel passes help passholders access services throughout the city and live independent lives, particularly those without a private vehicle.

10. Sustainability implications

- 10.1 The provision of concessionary travel passes encourages older person and disabled pass holders to use the bus rather than their own vehicles, reducing congestion and per capita emissions of pollutants and carbon.

11. Health and Wellbeing Implications:

- 11.1 The provision of concessionary travel passes support older person and disabled pass holders to be more active and supports their wellbeing through increased social interaction particularly if they don't have private means of transport

12. Conclusion

- 12.1 The fixed deal offers that have been accepted by bus operators for concessionary fares payment in the city for 2026-27 are considered to be reasonable and meet the principles of 'no better no worse off' for the operator.

Supporting Documentation

None

Brighton & Hove City Council

Agenda Item 186

Cabinet

Subject: Working towards cleaner air for Brighton & Hove through improved smoke control areas

Date of meeting: 14th May 2026

Report of: Cabinet Member for Net Zero & Environmental Services

Lead Officer: Name: Corporate Director - City Operations

Contact Officer: Name: David Currie

Email: David.Currie@brighton-hove.gov.uk

Ward(s) affected: (All Wards);

For general release

1. Purpose of the report and policy context

- 1.1 This report provides Cabinet with clear, up-to-date information and evidence to support decision-making on the future of Smoke Control Areas (SCAs) in Brighton & Hove.
- 1.2 SCAs have existed in parts of the city since the 1970s. In response to growing public health evidence on particulate pollution and widespread public interest, the council undertook a public consultation on replacing the five existing SCAs with a single, updated Smoke Control Area.
- 1.3 The aim of the proposed change is to reduce inhalation exposure to fine particulate matter (PM_{2.5}) arising from solid fuel burning, particularly during the winter heating season, and to provide a clearer, fairer and more consistent regulatory framework across the city. A reduction in this airborne pollution in the urban area will have significant health and wellbeing benefits across the population.

2. Recommendations

That Cabinet:

- 2.1 Approve revocation of the five existing SCA (Appendix 1) and the creation of a new single Smoke Control Order for Brighton & Hove.
- 2.2 Agree the geographical scope of the new SCA covering the built-up urban area (City Plan Part One area plus the urban fringe) within the council's Local Planning Authority boundary (Appendix 2).
- 2.3 Delegate authority to the Corporate Director City Operations, in consultation with the Cabinet Member for Net Zero & Environmental Services, to finalise

the Smoke Control Order wording for implementation ensuring compliance with and statutory requirements.

3. Context and background information

- 3.1 Brighton and Hove have one of the highest densities of wood-burning stoves in the country. Local monitoring data shows winter $PM_{2.5}$ concentrations are on average 91% higher during the 5-month heating season compared to the rest of the year, with domestic solid fuel burning identified as the dominant local source during the winter. Solid fuel burning, primarily wood and manufactured fuels has increased since the 1990s as supplementary heating, particularly in urban dwellings. While most homes are centrally heated, intermittent solid fuel use can produce disproportionate $PM_{2.5}$ emissions.
- 3.2 $PM_{2.5}$ is a harmful air pollutant associated with increased mortality and cardio-respiratory illness. There is no safe exposure level for vulnerable populations, including children, older people and those with pre-existing health conditions. Areas with the highest population density— particularly central Brighton, the city centre and lower slopes around Lewes Road—also experience the highest prevalence of asthma, COPD and heart disease.
- 3.3 A single Smoke Control Area would:
- simplify regulation and compliance.
 - improve fairness across neighbourhoods.
 - support planning and housing policy; and
 - enable clearer communications and proportionate enforcement.
- 3.4 The five smoke control areas were created by Brighton Borough Council in 1974 – 1979. These include Brighton City Centre, Hanover and Elm Grove, Bevendean and Montpelier. Smoke Control Areas prohibit commercial and residential premises from producing visible smoke from building chimneys and the buying and selling of unauthorised fuels. The process for creating the new smoke control area includes revoking the existing control area and creating a new area.
- 3.5 To reduce the risk of visible persistent smoke, only DEFRA approved fuels are allowed in to be burned in a SCA. This needs to be compatible with an approved appliance in accordance with the manufacture instructions. Only exempt fuels on DEFRA's list can be burned in an open fireplace. Legislation covering this activity is covered under the Clean Air Act 1993 as amended by the Environment Act 2021. Outdoor burning (including recycled waste and other forms of wood) is not covered by SCA legislation but may be considered under statutory nuisance legislation, part of the Environmental Protection Act 1990.
- 3.6 Following the Air quality Action Plan (AQAP) consultation 2022 there was 75% agreement that improving air quality health was a priority for the City Council. The majority of respondents to the recent consultation conducted in January and February 2026 favoured minimising smoke from chimneys as a means of improving air quality and health. The changes would be of particular benefit to children, older residents and those with underlying health conditions. Reducing $PM_{2.5}$ from solid fuel burning would also reduce the risk of COPD, asthma, heart disease, stroke and other illnesses across the population. Further summary of consultation responses is given in Appendix 4.

4. Analysis and consideration of alternative options

- 4.1 Consideration was given to keeping the five existing SCAs: this option is not supported by the air quality monitoring data which shows PM_{2.5} is substantially higher across the city during the winter burning season.
- 4.2 Expansion of the smoke control area up to the local authority boundary was considered. 44% of the local authority footprint is in the South Downs National Park, which contains less than 1% of the city's dwellings, and is much more sparsely populated. Conversely, more than 99% of residential and commercial buildings are within Brighton & Hove's urban area. Air quality data from within the SDNP does not show the same striking results as the urban area, and enforcement in sparsely populated rural areas would not be justifiable. As such, expansion to the boundary is not recommended.
- 4.3 The recommended option is a SCA for the City Plan Part 1 (CPP1) area including Development Areas and the urban fringe: this will cover the urban area with the highest population density. Energy Performance Certificates show a greater density of wood burners in the urban area. Air quality is shown to be more negatively impacted by smoke in the urban area than the South Downs National Park and, crucially, there are far more people, including vulnerable groups, to breathe it in.

Consultation feedback (Appendix 4 2026) shows strong support for expanding smoke control areas. The Local Planning Authority (CPP1) does not include Brighton & Hove's part of the SDNP. The boundary of the SDNP is not likely to change in the foreseeable future after 2030.

5. Community engagement and consultation

- 5.1 A public consultation on replacing the existing Smoke Control Areas with a single, updated Smoke Control Area ran from 19 January to 1 March 2026. This was supported by online consultation materials and a programme of in-person events at community libraries. 48% of respondents agreed with expansion, either to the local authority boundary or to cover the urban area. 29% favoured keeping the current 5 SCAs, while 21% wanted no SCAs at all. An analysis of consultation responses is given in Appendix 4.
- 5.2 The consultation builds on earlier engagement through the Local Transport Plan and the Air Quality Action Plan, seasonal air quality awareness campaigns delivered since 2020, and scrutiny-led work overseen by Place Overview & Scrutiny Committee. The proposal is aligned with national and local policy, including the National Planning Policy Framework and Planning Practice Guidance on air quality, the Environment Act 2021 PM_{2.5} targets, DEFRA Local Air Quality Management guidance, and Brighton & Hove's Air Quality Action Plan, Carbon Neutral 2030 Programme, Housing Strategy, and Fuel Poverty & Affordable Warmth Plan.
- 5.3 The proposal has been developed through close working with the Cabinet Member for Net Zero and Environmental Services (Deputy Leader of the Council) and engagement with key stakeholders including the South Downs National Park Authority, East Sussex Fire & Rescue Service, and representatives of relevant commercial sectors.

5.4 Engagement followed the council’s Community Engagement Framework, combining information-led communications with consultation through a six-week public consultation, ten in-person library drop-in sessions, targeted stakeholder engagement, and coordinated media and web communications. Feedback received has directly informed both the preferred geographical option and the proposed graduated communications and enforcement approach.

5.5 **Funding and Resource Provisions.**

- £48,694 of DEFRA burdens funding for smoke control has been received over four annual instalments, with a remaining amount of approximately £40k.
- One off pre – implementation communications cost of £6k (Autumn 2026), reflecting wider coverage, this will be less in the following year because new SCAs will be established
- Ongoing enforcement activity estimated at £2k per heating season will be carried out.

Table 1: Funding and anticipated spending on SCA (2026 to 2028)

DEFRA grant remaining April 2026	Anticipated Spend FY 2026/27 New SCA Communications and smoke patrol	Anticipated Spend FY 2027/28 Seasonal Communications and smoke patrol
£39,850.88	£8,000	£6,850

6. Financial implications

6.1 The costs for implementing the new smoke control area outlined in this proposal can be funded by the current new burdens funding awarded by DEFRA. The ongoing costs for enforcement activity can also be covered by the grant for a number of heating seasons, after which new funding must be identified. This can either be from existing regulatory services budgets or from new funding awarded by DEFRA

Name of Finance officer consulted: David Wilder Date consulted: 24.4.26

7. Legal implications

7.1 Local Authorities have the powers to declare, vary and revoke Smoke Control Areas under Part III of the Clean Air Act 1993. This Act enables Councils to make a Smoke Control Order for any area within its administrative boundary where it considers it appropriate for controlling smoke emissions from chimneys of buildings, furnaces and fixed boilers.

Before making a new Smoke Control Order, the Council must comply with the consultation requirements under the Act, which require:

- Publication of a notice of intention to make the Order:
- Consultation with persons likely to be affected, including residents, businesses and relevant stakeholders; and consideration of representations received.

These requirements have been met through the public consultation held between 19 January and 1 March 2026 and accompanying stakeholder engagement, the outcomes of which have informed the proposed geographical scope and implementation approach.

This proposal is consistent with the Council's wider statutory duties concerning local air quality management (under the Environment Act 1995), PM_{2.5} under the Environment Act 2021, the National Planning Policy Framework requirement to prevent unacceptable risks from air pollution.

Any subsequent enforcement under a Smoke Control Order must be reasonable, proportionate and consistent.

Name of lawyer consulted: Katie Kam

Date consulted: 16.4.26

8. Risk implications

- 8.1 There is a risk that solid fuel appliances installed from 2026/27 may remain in use well beyond 2040, locking in avoidable air quality impacts in urban areas where solid fuel burning is not an environmentally appropriate heating option. The proposal has been assessed using the council's corporate risk framework and identifies manageable risks relating to public acceptance, perceived enforcement proportionality, cross-boundary consistency and potential legal challenge.
- 8.2 These risks are mitigated through strong and transparent communications, alignment with fuel poverty support and cleaner heating options, a graduated enforcement approach, coordinated regional messaging through Sussex-air, and full legal quality assurance. With these measures in place, the risks are considered proportionate and controllable, supporting delivery of the council's public health, environmental and climate objectives while enabling future-proofed planning and sustainable design.

9. Equalities implications

- 9.1 Lower-income residents, older people and children experience disproportionate health impacts from air pollution. The proposed Smoke Control Area is therefore paired with the council's Fuel Poverty & Affordable Warmth Plan to mitigate any potential cost or heat-equity concerns through advice, support and signposting to cleaner heating options.
- 9.2 In Brighton & Hove, solid fuel burning is primarily used as supplementary heating in properties with existing hearths and space for fuel storage, meaning the proposal is unlikely to affect the primary heating needs of households experiencing fuel poverty. Energy Performance Certificates (EPC) and the Office of National Statistics (ONS) show a higher density of solid fuel burning in the local urban area. Local insight data shows that between 93% and 99% of local households are connected to electric or gas central heating including local district heating schemes.

- 9.3 Draft of the Equalities impact assessment (EIA) is available in support of the Cabinet report.

10. Sustainability implications

- 10.1 To meet UK Government net zero targets, household emissions will need to reduce by around 95 per cent, requiring a transition away from combustion-based heating towards cleaner electricity-led solutions such as solar thermal, ground, air and marine source heat pumps. Improved insulation, low-loss heat distribution, and district heating networks powered by non-combustion renewables are central to this shift, supported by the £60 million Warmer Homes innovation programme and emerging Future Homes and Building Standards.
- 10.2 Solid fuel heating carries significant embodied and operational emissions, including energy-intensive stove manufacture, fuel processing and transport impacts.

11. Health and Wellbeing Implications:

- 11.1 Reducing domestic smoke emissions will help address winter peaks in PM_{2.5} that are associated with increased cardio-respiratory illness and premature mortality, supporting both local air quality objectives and the health expectations set out in the National Planning Policy Framework. The Chief Medical Officer has highlighted the particular health risks of domestic wood burning in urban areas, reinforcing the need for action. The proposal supports the protection of human health and contributes to meeting UK and EU-derived targets and working towards World Health Organisation PM_{2.5} guidelines.

Names Consulted: Kathleen Cuming, Consultant in Public Health received 16.04.26. Nicola Lang, Director of Public Health.

13. Crime & disorder implications:

- 13.1 It is against the law to burn or sell unauthorised fuels in a Smoke Control Area. Neighbour disputes can escalate due to the offence of smoke ingress to nearby properties especially where there are strongly felt sensitives such as palliative care, bronchitis, lung cancer, childhood asthma.

14. Conclusion

- 14.1 The key reason for seeking this decision is: healthier city with ultra-low Particulate Matter and healthier air quality. In Brighton & Hove, solid fuel burning is the main source of PM_{2.5} during winter when concentrations can be twice as high (compared summer + October that is not the heating season). Solid fuel burning is not the best environmental option for supplementary heating in the urban area. Exempt appliances and approved stoves reduce the risk of smoke from a chimney and are more appropriate for rural areas such as those without natural gas supply or district heating schemes.

Supporting Documentation

1. Map showing existing Smoke Control Areas & Unitary – shared public consultation 2026

2. Map outlining proposed Smoke Control Area (SCA)
3. Equalities Impact Assessment for SCA
4. Public consultation feedback

Appendix 1 Existing five Brighton Smoke Control Areas and the Unitary Authority Boundary



Appendix 2 Proposed Smoke Control Area The Local Planning Authority, City Plan Area
(not including BHCC's part of the South Downs National Park)



General Equality Impact Assessment (EIA) Form

Support:

An [EIA toolkit](#), [workshop content](#), and guidance for completing an [Equality Impact Assessment \(EIA\) form](#) are available on the [EIA page](#) of the [EDI Internal Hub](#). Please read these before completing this form.

For enquiries and further support if the toolkit and guidance do not answer your questions, contact the Equality, Diversity, and Inclusion (EDI) team by emailing Equalities@Brighton-Hove.gov.uk. If your request is urgent, please mention this in the subject line of your email so we can support as required.

Processing Time:

- EIAs can take up to 10 business days to approve after a completed EIA of a good standard is submitted to the EDI Team. This is not considering unknown and unplanned impacts of capacity, resource constraints, and work pressures on the EDI team at the time your EIA is submitted.
- If your request is urgent, we can explore support exceptionally on request.
- We encourage improved planning and thinking around EIAs to avoid urgent turnarounds as these make EIAs riskier, limiting, and blind spots may remain unaddressed for the 'activity' you are assessing.

Process:

- Once fully completed, submit your EIA to the Equalities team by emailing the Equalities inbox and copying in your Head of Service, Business Improvement Manager (if one exists in your directorate), any other relevant service colleagues to enable EIA communication, tracking and saving.
- Your EIA will be reviewed, discussed, and then approved by the assigned EDI Officer and after seeking additional approval as appropriate for your EIA.
- Only approved EIAs are to be attached to Committee reports. Unapproved EIAs are invalid.

1. Assessment details

Throughout this form, 'activity' is used to refer to many different types of proposals being assessed.

Read the [EIA toolkit](#) for more information.

Name of activity or proposal being assessed:	Expanding Smoke Control Areas
Directorate:	City Infrastructure
Service:	Regulatory Services
Team:	Environmental Protection, Air Quality
Is this a new or existing activity?	New
Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)	Yes, Air Quality Action Plan (2015 not changed 2022)

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

Responsible Lead Officer:	Samuel Rouse
Accountable Manager:	Temitayo Oluntanji
Additional stakeholders collaborating or contributing to this assessment:	David Currie Head of Regulatory Services, Public Health Consultants

3. About the activity

Briefly describe the purpose of the activity being assessed:

Expand smoke control areas to the urban part of Brighton & Hove City Council

What are the desired outcomes of the activity?

Reduced pollution, healthier air for everyone including protected characteristics

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

Vulnerable groups very young and old. Sedentary or housebound people spending 99% of their time at one dwelling place, some with disabilities, limited mobility that may be related to gender reassignment, domestic abuse, pregnancy & maternity, race, religion & belief. Women and girls are more vulnerable to pollution inhalation due to smaller lung capacity (on average).

4. Consultation and engagement

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

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

Air quality action plan consultation 2022. Expanding smoke control areas consultation 2026 (Your Voice survey), library events 2026. Seasonal communications (every year) and pollution monitoring (continuous) to raise awareness.

5. Current data and impact monitoring

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

(State Yes, No, Not Applicable as appropriate)

Age	Yes Available from Public Health Insight, Census and Office of National Statistics.
Disability and inclusive adjustments, coverage under equality act and not	Yes

Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	YES Available from Public Health Insight, Census and Office of National Statistics. A higher percentage of ethnic minorities in high density urban areas where pollution is relatively concentrated. The measure will have benefits that help to address these inequalities.
Religion, Belief, Spirituality, Faith, or Atheism	YES Available from Public Health Insight and Census and Office of National Statistics. Lower than national average in the area.
Sex	YES Slightly more than 50% female in the area
Gender (including non-binary and Intersex people)	YES Non-binary higher than national average
Gender Reassignment	YES Non-binary higher than national average
Sexual Orientation	YES
Marriage and Civil Partnership	YES
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	NO
Armed Forces Personnel, their families, and Veterans	NO
Expatriates, Migrants, Asylum Seekers, and Refugees	NO
Carers	NO
Looked after children, Care Leavers, Care and fostering experienced people	NO
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	NO
Socio-economic Disadvantage	NO
Homelessness and associated risk and vulnerability	YES
Human Rights	?
Another relevant group (please specify here and add additional rows as needed)	N/A

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

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

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

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

Equalities <Equalities@brighton-hove.gov.uk>

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

Available from Public Health Insight, Census and Office of National Statistics. A number of complementary pollution monitoring contracts and tools.

6. Impacts

Advisory Note:

- **Impact:**
 - Assessing disproportionate impact means understanding potential negative impact (that may cause direct or indirect discrimination), and then assessing the relevance (that is: the potential effect of your activity on people with protected characteristics) and proportionality (that is: how strong the effect is).
 - These impacts should be identified in the EIA and then re-visited regularly as you review the EIA every 12 to 18 months as applicable to the duration of your activity.
- **SMART Actions mean:** Actions that are (SMART = Specific, Measurable, Achievable, Realistic, T = Time-bound)
- **Cumulative Assessment:** If there is impact on all groups equally, complete **only** the cumulative assessment section.
- **Data analysis and Insights:**
 - In each protected characteristic or group, in answer to the question ‘If “YES”, what are the positive and negative disproportionate impacts?’, describe what you have learnt from your data analysis about disproportionate impacts, stating relevant insights and data sources.
 - Find and use contextual and wide ranges of data analysis (including community feedback) to describe what the disproportionate positive and negative impacts are on different, and intersecting populations impacted by your activity, especially considering for [Health inequalities](#), review guidance and inter-related impacts, and the impact of various identities.
 - For example: If you are doing road works or closures in a particular street or ward – look at a variety of data and do so from various protected characteristic lenses. Understand and analyse what that means for your project and its impact on different types of people, residents, family types and so on. State your understanding of impact in both effect of impact and strength of that effect on those impacted.
- **Data Sources:**
 - **Consider a wide range (including but not limited to):**
 - [Population and population groups](#)
 - [Census 2021 population groups Infogram: Brighton & Hove by Brighton and Hove City Council](#)
 - [Census](#) and [local intelligence data](#)
 - Service specific data
 - Community consultations
 - Insights from customer feedback including complaints and survey results

- Lived experiences and qualitative data
 - [Joint Strategic Needs Assessment \(JSNA\) data](#)
 - [Health Inequalities data](#)
 - Good practice research
 - National data and reports relevant to the service
 - Workforce, leaver, and recruitment data, surveys, insights
 - Feedback from internal 'staff as residents' consultations
 - Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
 - Insights, gaps, and data analyses on 'who' the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.
- Learn more about the [Equality Act 2010](#) and about our [Public Sector Equality Duty](#).

6.1 Age

Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: older people, people who may be housebound, those under 16, young adults, with other intersections.	YES
---	-----

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

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

YES oldest and youngest more likely to be impacted by pollution. Available from Public Health Insight, Census and Office of National Statistics.
--

6.2 Disability:

Does your analysis indicate a disproportionate impact relating to Disability, considering our anticipatory duty?	YES / NO
---	----------

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

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

YES those with many disabilities and underlying health conditions are more likely to be impacted by pollution. Available from Public Health Insight, Census and Office of National Statistics.
--

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

Accessible reports online.

6.3 Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers):

Does your analysis indicate a disproportionate impact relating to ethnicity?	YES
--	-----

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

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

Available from Public Health Insight, Census and Office of National Statistics.

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

Does your analysis indicate a disproportionate impact relating to Religion, Belief, Spirituality, Faith, or Atheism?	NO
--	----

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

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

--

6.5 Sex:

Does your analysis indicate a disproportionate impact relating to Sex ?	YES
---	-----

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

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

Women and girls are more vulnerable to pollution inhalation due to smaller lung capacity (on average).
--

6.6 Gender and Gender Reassignment:

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

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

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

Does your analysis indicate a disproportionate impact relating to Gender Reassignment ?	YES
---	-----

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

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

Higher proportion in Brighton & Hove where pollution is more concentrated than in the countryside, other towns and cities

6.7 Sexual Orientation:

Does your analysis indicate a disproportionate impact relating to Sexual Orientation ?	YES
--	-----

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

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

Higher proportion in Brighton & Hove where pollution is more concentrated than in the countryside, other towns and cities

6.8 Marriage and Civil Partnership:

Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?	NO
---	----

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

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

--

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

Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)?	YES
---	-----

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

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

Foetus, neo natal and newborn infants more vulnerable to pollution

6.10 Armed Forces Personnel, their families, and Veterans:

Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?	YES
--	-----

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

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

Can be more vulnerable to pollution due to mobility compromising injury or PTSD

6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

<p>Does your analysis indicate a disproportionate impact relating to Expatriates, Migrants, Asylum seekers, Refugees, those New to the UK, and UK visa or assigned legal status? (Especially considering for age, ethnicity, language, and various intersections)</p>	<p>YES</p>
--	------------

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

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

More likely to live in poor quality housing. Less likely to access awareness raising information.

6.12 [Carers](#):

<p>Does your analysis indicate a disproportionate impact relating to Carers (Especially considering for age, ethnicity, language, and various intersections).</p>	<p>YES</p>
--	------------

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

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

Can be in tied to one dwelling place most of the time. Limiting time in fresh air.

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

<p>Does your analysis indicate a disproportionate impact relating to Looked after children, Care Leavers, Care and fostering experienced children and adults (Especially considering for age, ethnicity, language, and various intersections). Also consider our Corporate Parenting Responsibility in connection to your activity.</p>	<p>YES</p>
--	------------

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

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

Can be in tied to one dwelling place most of the time. Limiting time in fresh air.

6.14 Homelessness:

Does your analysis indicate a disproportionate impact relating to people experiencing homelessness, and associated risk and vulnerability? (Especially considering for age, veteran, ethnicity, language, and various intersections)	YES
---	-----

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

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

Can spend time, sitting or lying on the footway at low height where pollution is more concentrated.

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

Does your analysis indicate a disproportionate impact relating to Domestic Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)?	YES
--	-----

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

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

Can be trapped at one premises, limiting opportunity for exercise and fresh air.
--

6.16 Socio-economic Disadvantage:

Does your analysis indicate a disproportionate impact relating to Socio-economic Disadvantage? (Especially considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections)	YES
--	-----

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

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

Associated with poor quality housing, roadside & junction dwelling places. Poor fenestration. Limited opportunity for ventilation and fresh air.
--

6.17 Human Rights:

Will your activity have a disproportionate impact relating to Human Rights?	NO
--	----

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

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

6.18 Cumulative, multiple [intersectional](#), and complex impacts (including on additional relevant groups):

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

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

Greater exposure to pollution in high density urban neighbourhoods. Less opportunity for activity, change of scene and clean air.

7. Action planning

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

- Summarise relevant SMART actions from your data insights and disproportionate impacts below for this assessment, listing appropriate activities per action as bullets. (This will help your Business Manager or Fair and Inclusive Action Plan (FIAP) Service representative to add these to the Directorate FIAP, discuss success measures and timelines with you, and monitor this EIA's progress as part of quarterly and regular internal and external auditing and monitoring)

1. Replace this sentence and write your first [SMART Action](#) – you can add more actions and rows as needed and add details of activities you will carry out to fulfil your [SMART Action](#)

- Activity 1 to fulfil your [SMART Action](#)
- Activity 2 to fulfil your [SMART Action](#)

2. Replace this sentence and write your second [SMART Action](#) – you can add more actions and rows as needed and add details of activities you will carry out to fulfil your [SMART Action](#)

- Activity 1 to fulfil your [SMART Action](#)

- Activity 2 to fulfil your [SMART Action](#)

Which action plans will the identified actions be transferred to?

- For example: Team or Service Plan, Local Implementation Plan, a project plan related to this EIA, FIAP (Fair and Inclusive Action Plan) – mandatory noting of the EIA on the Directorate EIA Tracker to enable monitoring of all equalities related actions identified in this EIA. This is done as part of FIAP performance reporting and auditing. Speak to your Directorate’s Business Improvement Manager (if one exists for your Directorate) or to the Head of Service/ lead who enters actions and performance updates on FIAP and seek support from your Directorate’s EDI Business Partner.

Expand Smoke Control Area is a key measure cited in the Air Quality Action Plan.

8. Outcome of your assessment

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

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

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

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

Expanding SCA actions will benefit vulnerable groups and protected characteristics.

9. Publication

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

10. Directorate and Service Approval

Signatory:	Name and Job Title:	Date: DD-MMM-YY
Responsible Lead Officer:	Samuel Rouse	22-April-2026
Accountable Manager:	Temitayo Oluntanji, Operations Manager	

Notes, relevant information, and requests (if any) from Responsible Lead Officer and Accountable Manager submitting this assessment:

EDI Review, Actions, and Approval:

Equality Impact Assessment sign-off

EDI Officer to cross-check against aims of the equality duty, public sector duty and our civic responsibilities the activity considers and refer to relevant internal checklists and guidance prior to recommending sign-off.

Once the EDI Officer has considered the equalities impact to provide approval for by those submitting the EIA, they will get the EIA signed off and sent to the requester copying the Head of Service, Business Improvement Manager, [Equalities inbox](#), any other service colleagues as appropriate to enable EIA tracking, accountability, and saving for publishing. Budget and Staffing EIAs secure approval via different templates.

Signatory:	Name:	Date: DD-MMM-YY
EDI Business Partner:		
EDI Manager:		

Notes and recommendations from EDI Business Partner reviewing this assessment:

Notes and recommendations (if any) from EDI Manager reviewing this assessment:

Appendix 4 Expanding Smoke Control Areas in the city most recent consultation closed 1st March 2026.

Summary

95% of respondents identified as Brighton & Hove residents (>82% homeowners and 9% renters, (9% did not say which). 2% were people working in the area and 1% Trade. 2% other (former resident, possible future resident, visitor, neighbouring authority).

The main trend across the feedback received is strong support for expanding smoke control areas in Brighton & Hove (to a larger area than the existing five, to include all the urban Local Planning Authority: close to 60% of BHCC's total area), with concerns frequently raised about air quality and public health. Several respondents highlighted the negative impact of wood burning and other forms of domestic smoke (indoor fireplace solid fuel burning, waste and coal) on respiratory health, particularly for vulnerable groups and other health matters such as children, elderly and those with pre-existing conditions like asthma. The feedback refers to indoor and outdoor air quality.

. There is also a recurring theme of frustration with current enforcement, with some suggesting that existing regulations are not adequately policed or publicised

. A few comments mention the need for clearer guidance and support for residents to transition to cleaner heating alternatives

. Overall, the responses reflect a community desire for stronger action and more effective communication regarding smoke control measures.

- Recurring call for stricter enforcement and clearer guidance for residents
- Some respondents highlighted the need for public education about the dangers of domestic burning and alternative heating options
- A minority raised concerns about the impact on personal freedoms and questioned whether restrictions would be effective or fair
- Overall, the dominant trend was strong support for measures to reduce smoke pollution, with emphasis on health, enforcement, awareness raising and education.

Many respondents highlighted that vehicle emissions and traffic pollution are a much greater concern for air quality in Brighton & Hove than domestic wood burning, with several calling for more focus on restricting vehicles, introducing clean air zones, or addressing traffic management schemes.

There was significant criticism of the council's 'Cosy Killer' campaign, with multiple respondents describing it as scaremongering, misleading, or alienating, and calling for more balanced, factual, and educational approaches instead of fear-based messaging.

Several respondents, including a local chimney sweep, stressed the need for clear, practical education about what is and isn't allowed, rather than blanket demonisation of all wood burning.

Respondents expressed strong support for expanding smoke control areas, citing health impacts (especially for those with asthma) and the unnecessary nature of wood burning in urban areas with alternative heating options.

However, others argued that outright bans are excessive, especially given the cost of gas and electricity, and that responsible use of modern, compliant stoves should be permitted.

Some suggested targeting only the oldest, most polluting stoves and fireplaces or limiting fuel sales, rather than blanket restrictions.

There were also calls for the council to prioritise basic services such as road maintenance, waste collection, and recycling, with some expressing scepticism about the council's priorities and the accuracy of pollution statistics.

Answer re pollution science: *Additional air quality monitoring has been connected 2024 and 2025 and this has established verification procedure with quality control. Further information is available in the Annual Status Report for air quality appraised by DEFRA, Department for the Environment. All solid fuel burning produces smoke indoors and outdoors. The best environmental option is to encourage and fund home heating without combustion and emissions.*

In summary, the main trends are: a strong call to focus on vehicle emissions over domestic burning, criticism of current council communications, a split between those supporting stricter controls on wood burning and those defending responsible use, and a desire for more practical, educational, and nuanced approaches rather than blanket bans or alarmist campaigns.

Answer: *In Brighton & Hove, during winter solid fuel burning is the number one contributor to outdoor concentrations of Particulate Matter. Diesel vehicles are the dominant source of Nitrogen Dioxide in the city, especially along urban transport corridors. Lorries and buses can reduce their emissions substantially with exhaust mitigation. Video calls save the need to travel. Many city centre developments generate fewer vehicle trips than the previous planning permission. Active travel and electric trips (bike, car, van, bus) are helping to improve local air quality for residents and visitors.*

The Your Voice consultation (2026) complements face to face events at libraries and the Air Quality Action Plan consultation that ran for twelve weeks. 2022, 87% of respondents agreed with reducing emissions from buildings and developments. Awareness raising communications campaigns about the health risks for solid fuel burning have been run by Brighton & Hove City Council every winter since 2020. [Please think twice about fires - indoors or outdoors!](#)

2026 at libraries: Some people with wood burners were keen to blame cars for pollution. A Patcham resident wanted to know how many minutes smoke can be emitted from a chimney if it is often and recurring. A Queens Park resident wanted to know which fuels can be burned in an open fireplace on family occasions about eight times a year. [Smoke control areas: the rules - GOV.UK.](#)

Other consultation questions responses not covered above:

Qu4 Does anyone in your household have a health condition that could be affected by air quality?

For example, asthma, lung or heart disease. Of those that gave an answer:

No	64.6%
Yes	35.4%

Qu5 Have you noticed smoke from chimneys near your home?

Of those that gave an answer:

Occasionally	54.8%
Often	21.1%
Never	24.1%
Total Yes	75.9%

Qu6 Would you support reducing visible smoke from household and commercial chimneys in your neighbourhood?

Of those that gave an answer:

Strongly Support	41.4%
Support	5%
Neutral	7.3%
Oppose	10%
Strongly Oppose	36.4%

Qu7 What is your view on reducing solid fuel burning in urban areas?

Of those that gave an answer:

Strongly Support	40.1%
Support	7.6%

Neutral	8.6%
Oppose	10.4%
Strongly Oppose	33.3%

Qu8 Would you support stricter enforcement of smoke control regulations?

Of those that gave an answer:

Yes	51.2 %
No	48.8%

Qu10 Should the council signpost financial support and grant schemes to help households upgrade cleaner heating systems?

Of those that gave an answer:

Yes	74.9%
No	25.1%

Qu11 Would you support more education and awareness measures to help residents understand the health impacts of smoke?

Of those that gave an answer:

Yes	67.4%
No	32.6%

Brighton & Hove City Council

Cabinet

Agenda Item 187

Subject: Council Housing Asset Management Plan

Date of meeting: Thursday, 14th May 2026

Report of: Cabinet Member for Housing

Lead Officer: Corporate Director Homes & Adult Social Care

Contact Officer: Martin Reid, Director, Homes & Investment
Email: martin.reid@brighton-hove.gov.uk
Geoffrey Gage, Head of Housing Investment & Asset Management
Email: geoffrey.gage@brighton-hove.gov.uk

Ward(s) affected: All

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 This report provides Cabinet with the Council Housing Asset Management Plan 2026 to 2027 for approval, publication and implementation. The Plan sets out the council's current approach and one year framework for managing and investing in council homes and estate assets through the Housing Revenue Account.
- 1.2 The Council Housing Asset Management Plan supports delivery of the Council Plan 2023 to 2027 outcomes Homes for Everyone and A responsive Council with Well Run Services. The Plan aligns to core priorities in the Housing Strategy 2024-29, including to: Improve housing quality, safety and sustainability; Deliver the homes our city needs; and Provide resident-focused housing services. It translates these priorities into practical investment choices and delivery controls for council homes and estates and supports the council's aim to be a Great Landlord and supports our regulatory improvement journey.

2. Recommendations

That Cabinet:

- 2.1 Approve the Council Housing Asset Management Plan.

2.2 Note plans to develop our Council Housing Asset Management Strategy to fully reflect emerging stock condition data, resident engagement and our Housing (Safety & Quality) Improvement Programme 2026 to 2027.

3. Context and background information

3.1 The Council Housing Asset Management Plan sets out how the council knows what it owns, what condition it is in, what risks exist, and how it plans investment over time. It underpins safety, quality, value for money, and transparent decisions for residents and members. It also affects the day to day experience residents have of their homes, because better stock knowledge helps the council target planned and major works programmes and reduce repeat problems and responsive repairs.

3.2 It will be refreshed annually alongside the budget setting process. The Plan sets out what the council currently knows about our homes, how the council prioritises investment and how residents can influence choices and track progress. Over the period of the Plan (2026/27) the council is investing £54m to improve the quality of our council homes. In addition, the council is investing an estimated £2m over the next two years in our new stock condition survey programme covering all our homes, providing clearer and more accurate data. A full, multi-year, Council Housing Asset Management Strategy will be developed over the term of the Council Housing Asset Management Plan to reflect both up to date knowledge about our homes as we improve stock condition information and our plans for a step change in how the council develops a more resident-led approach. This is to ensure that the council fully engages with tenants and leaseholders in a structured way so that resident insight, influence and feedback consistently inform asset management strategy, investment planning and decisions.

3.3 This report is brought forward because asset management is a core test under the strengthened social housing regulatory regime. The council must be able to evidence stock knowledge, quantify risk and liabilities, and demonstrate how investment decisions are prioritised, monitored and adjusted over time. This Plan provides that framework, while remaining realistic about what further work is required as evidence and systems mature.

3.4 The Regulator of Social Housing (RSH) Consumer Standards require social landlords to be able to evidence a strategic approach to asset management, supported by accurate and up-to-date property-level stock condition data based on physical inspection, and to demonstrate how that evidence is used to manage safety, quality and investment risks and priorities, underpinned by clear governance, assurance and transparency. While not mandated, an Asset Management Strategy remains the clearest way to demonstrate compliance. Knowing our homes and estates is a core part of being a Great Landlord. The council's approach remains that compliance is the floor, not the ceiling. The Council Housing Asset Management Plan supports the council's continued improvement journey as we develop our Council Housing Asset Management Strategy and as part of our ongoing formal intensive

engagement with the RSH following the C3 Regulatory Judgement of 9 August 2024 in relation to the Safety & Quality Consumer Standard.

- 3.5 Decisions about investment and planned works are already being made, so the council needs a published plan now. The Plan will provide a clearer and more transparent basis for how decisions are made, what evidence and assumptions sit behind them, and how priorities are set and delivered. It will also help explain what is being funded now, what may need to change later, and why.
- 3.6 As set out in the Plan, in considering investment and programmes of work, the council will use a clear prioritisation ladder: safety and legal duties first, followed by buildings at risk of serious failure, then work that tackles the underlying causes of repeat problems, and finally wider improvements where the evidence supports them and affordability allows. The council is also transparent that stock knowledge is not yet at the standard required, and that the new survey programme is a key part of improving the evidence base. The council will not wait for perfect information before acting, particularly on safety. Year 1 of the Plan reflects current commitments, while later years provide a forward view rather than a fixed promise and may change as survey coverage improves, costs move and delivery plans become firmer.
- 3.7 Our Council Housing Asset Management Plan reflects the following core elements of our Housing (Safety & Quality) Improvement Programme (2026/27):
- *‘A great landlord knows the quality of the stock they own, what works have been undertaken and when, and can use the information held to plan for preventative maintenance and longer- term capital investment in planned and major works programmes’*
 - *‘We use stock condition data and up to date asset insight to set priorities that inform planned preventative maintenance programmes and reduce responsive repairs’.*
- 3.8 A full, multi-year, Council Housing Asset Management Strategy will be developed over the term of the Council Housing Asset Management Plan to reflect both up to date knowledge about our homes as we improve stock condition information and our plans for a step change in how the council develops a more resident-led approach. An Asset Management Strategy (AMS) provides strategic direction for how the council will plan and deliver planned and major works, meet relevant legislation and regulatory requirements, and ensure transparency and meaningful engagement with residents. It also provides assurance that the council is fulfilling its statutory duties and is compliant with relevant legislation and regulations.
- 3.9 In developing its Asset Management Strategy, the council must be able to demonstrate a clear, cross-housing approach to managing assets over the short, medium and long term, with clear links between stock condition data, investment decisions (including repairs, planned works, major works and compliance activity) and risk management and assurance. The Strategy

should also show alignment with legal health and safety duties and the Decent Homes Standard and set out clear governance and accountability arrangements for asset management decisions.

- 3.10 The council manages 12,761 homes (April 2026) including Seaside Homes and council owned temporary accommodation. Flats, including bedsits, and maisonettes represent 65 percent of the council's rented homes, building types that require more intensive compliance activity. This includes 46 high-rise blocks, of which eight are Large Panel System (LPS) buildings, which do not currently meet modern safety standards. The council has put in ongoing safety measures pending demolition and regeneration of Large Panel System blocks. The council retains freehold responsibility for more than 2,500 leasehold properties within blocks, increasing the proportion of homes where additional compliance duties apply.
- 3.11 The council has an ageing housing stock. Over two thirds of homes in our stock were constructed before 1970.. Over time, budget constraints have contributed to a historic underinvestment in our homes leaving the council with a significant number of ageing properties that do not meet current more stringent health and safety regulations or quality and sustainability standards.
- 3.12 This matters because shared systems and communal areas mean a single failure can affect more than one home. Older buildings can also need more work to keep them safe, dry and in good repair. Good access planning and reliable records are therefore essential.
- 3.13 The council also manages estate assets including 82 car parking sites with 1,895 spaces and 92 garage sites with 1,068 garages. In addition, the council has 162 commercial properties held in the Housing Revenue Account, including shops on estates.
- 3.14 The 2026/27 HRA budget proposes substantial investment of £54m in our existing housing stock to improve the quality of our council homes, including:
- £17.7m - to continue investment on health & safety and compliance work such as meeting building and fire safety regulations;
 - £16.5m – to invest in major projects that maintain the structural, external integrity and fabric of homes;
 - £9.5m - to invest in planned preventative works programmes, to ensure investment reduces cost pressures of responsive repairs and other reactive works;
 - £5.4m - to invest in sustainability measures. such as improvements to communal and domestic heating systems & Solar PV.
 - £5.2m – to invest in supporting people to live independently in their homes for longer through housing adaptations, environmental and communal area improvement work based on resident priorities, minor capital works and major empty property works.
- 3.15 Following the RSH regulatory judgement, -the council published a Root Cause Analysis identifying the causes of compliance failures as a platform for

organisational learning, culture change and shared ownership. It identified data quality as a root cause of past compliance failures. The Plan treats good data as a control. It supports fair prioritisation, consistent risk management and proof that work is complete and risk has reduced. Using the council's learning organisation framework and pursuing our ambition to be a Great Landlord, the Council Housing Asset Management Plan responds by strengthening stock knowledge, decision traceability, audit trail discipline and resident transparency.

- 3.16 The stock profile is clear. The condition baseline is still being strengthened. As of March 2026, 19.3 % of council homes have a stock condition survey recorded on the NEC housing system (. Cabinet agreed in December 2025 to procure and award a two year Stock Condition Survey Contract via a specialist contractor, with an estimated value of £2 million. The contractor will complete comprehensive, high quality surveys across all council homes within two years and provide milestone summary reports on key findings and investment requirements at agreed stages. Mobilisation is expected to begin in summer 2026, with estimated completion by spring 2028.
- 3.17 The intended outcome is a complete, reliable and independently auditable picture of the council's housing stock. This will inform planned and major programmes of work and support longer term Housing Revenue Account business planning. Until survey coverage is complete, the council will manage risk using the best available evidence. This includes keeping safety and legal duties first and using targeted inspections and follow up where risks persist or problems repeat. The direction of travel remains positive, while remaining realistic about what further work is required as evidence and systems mature.
- 3.18 At present, stock intelligence sits across systems with varying completeness and inconsistent definitions. This limits the council's ability to produce a single reliable view of stock condition, compliance liabilities and investment priorities. The Plan strengthens decision traceability so the council can show why work has been prioritised, what alternatives were considered, and how decisions, investment choices and trade-offs were managed. This supports transparent decision making for residents and members and strengthens the council's ability to evidence that controls are embedded into business as usual systems and are sustained and auditable.
- 3.19 The Plan includes a clear example of evidence led risk control through the approach to the eight Large Panel System blocks, including interim measures and the Cabinet decision route for regeneration.

Resident engagement & communication

- 3.20 The council's Root Cause Analysis found resident voice to be a key area for consideration, including with residents' concerns not always being heard early enough or used consistently to shape priorities and decisions. Residents' feedback is a key part of the evidence picture. The Plan summarises what residents have told the council about repairs, damp and mould, heating and hot water, estate conditions, hazards and communication. These themes are

used as tests for priorities, delivery standards and communication. They also help target surveys and planned works, so investment is focused where it will reduce repeat problems and harm.

- 3.21 Statutory resident consultation requirements will continue to apply; however, the council will also aim to provide earlier visibility where possible and clearer information for residents on scope, timing, costs and any changes. Residents' views can help shape the council's approach, including the development of the asset management strategy, the sequencing and grouping of works to reduce disruption, expectations on communication and access arrangements, and (where there is discretion) some design choices.
- 3.22 This year, residents will have a clearer route to influence non safety sequencing and design choices where there is discretion through quarterly resident budget sessions. The council aims to publish a short plain English Homing In update after each session that summarises what was delivered, what changed and why, and what happens next. The annual refresh will provide the year end position and explain material changes.
- 3.23 Following Cabinet approval, the council will publish the Plan and brief delivery leads and key stakeholders. The council will embed the prioritisation ladder and trade off discipline, mobilise the survey programme and strengthen survey quality checks, and align service delivery plans and reporting to the Plan's one year delivery focus and annual refresh cycle.

4. Analysis and consideration of alternative options

- 4.1 This section sets out the options considered and explains why the recommended approach is the best fit for the council's current position, including the need to take decisions while stock condition evidence and resident voice are still being strengthened.
- 4.2 **Option 1 Continue without approving an adopted plan**
This option is not recommended. It would leave the council without a single, published framework that explains how priorities are set, how evidence is used, and how material trade-offs are recorded and reviewed. This would reduce transparency for residents and members and make it harder to demonstrate consistent decision making and assurance under enhanced consumer regulation requirements. It would also weaken the council's ability to show clear progress in embedding landlord controls into business-as-usual systems.
- 4.3 **Option 2 Delay publication until survey coverage is complete**
This option is not recommended. The council must take investment decisions now while the evidence baseline is still developing. Delaying publication would weaken grip and accountability during the survey period, when residents and members need clearer information about what is protected, what can change, and what is being done in the meantime to manage risk. The procurement and award route for the two year Stock Condition Survey Contract was agreed by Cabinet in December 2025. Waiting for full survey coverage before

adopting the Plan would not remove the need to make priorities and trade-offs during this period.

- 4.4 Option 3 Approve a one-year plan with annual refresh and a route to maturity
This option is recommended. It provides a clear, publishable framework now, while being honest about evidence maturity. It protects safety and legal duties first, sets consistent decision rules, and makes gaps and interim controls transparent. It provides a controlled annual refresh route aligned to the Housing Revenue Account budget cycle, so the Plan can be kept up to date as survey coverage increases and programme maturity and resident voice improves. Cabinet oversight remains central to maintaining transparency, accountability and confidence.

5. Community engagement and consultation

- 5.1 The Council Housing Asset Management Plan draws on what residents have already told the council through existing engagement activity. This includes themes from complaints, Housing Area Panels, STAR (survey of tenants and residents) results and other engagement routes referenced in the Plan.
- 5.2 The council recognises that engagement and feedback loops are still being strengthened. This year focuses on putting a consistent minimum feedback loop in place and building from that, rather than creating multiple parallel routes that are hard to sustain.
- 5.3 The Plan is clear about decision rights. Safety and legal duties are not optional. Where there is discretion, residents can influence sequencing and design choices for non-safety investment, and how the council communicates, plans access and reduces disruption.
- 5.4 Resident voice is not separate from asset management. It helps the council spot problems early, understand harm, and check whether actions are working in real life. This supports the council's improvement journey and the Root Cause Analysis focus on strengthening transparency, learning and shared ownership, and on moving away from reliance on informal knowledge.
- 5.5 For 2026 to 2027, the Plan proposes quarterly resident budget sessions including a focus on Asset Plan and stock condition survey linked to the Housing Revenue Account budget cycle. These sessions will be supplemented by discussions at Housing Area Panels and an continual 'always on' feedback route signposted through Homing In. To embed engagement into business as usual, the council aims to publish a short plain English Homing In update after each session. This will summarise what was discussed, what residents said, what will change as a result where there is discretion, and what happens next. The plan will be refreshed annually through the Housing Revenue Account budget cycle, including a clear summary of what changed and why.
- 5.6 The December 2025 Cabinet report on the Stock Condition Survey Contract also proposed resident involvement in the procurement process. This focused

on quality elements such as customer service, resident engagement and being a considerate contractor. This supports the Plan's wider approach to resident involvement and transparency, including clear expectations about how contractors will work in residents' homes and communal areas.

- 5.7 Residents will be able to track progress through the Homing In updates after each quarterly session and through the annual refresh of the Plan.

6. Financial implications

- 6.1 The Housing Asset Management plan aligns with the HRA capital budget approved in February 2026, to cover the investment required to repair, maintain and improve the housing stock.
- 6.2 The HRA revenue budget included investment of £2m for a stock condition survey of the entire housing stock, allocated across 2026/27 and 2027/28 (£1m each year) and the data from this will help inform future investment requirements and will need to be reflected into the 2027/28 budget setting cycle and the Medium Term Financial Strategy.

Comment by Finance Lead: Michael Bentley 16 April 2026

7. Legal implications

- 7.1 The plan is crucial in ensuring the Council meets a range of regulatory standards. The Social Housing Regulation Act came into effect from 1 April 2024 and requires social landlords to comply with the standards set by the Regulator of Social Housing (RSH). The management of the safety of council housing also falls under the scrutiny of the Building Safety Regulator, the HSE and East Sussex Fire & Rescue Service.
- 7.2 On 9 August 2024 the Regulator of Social Housing issued a C3 regulatory judgment that there are serious failings in the Council as landlord delivering the outcomes of the consumer standards and significant improvement is needed specifically in relation to outcomes for the national Safety and Quality Standard. The Regulator expects the Council as landlord to continue to drive significant change and improvements to the condition of our stock.
- 7.3 Strategic approach to stock management will also assist in preventing and addressing repairs, which currently expose the Council to risk of compensation claims for repairs not conducted within statutory timescales. Awaab's Law came into force for the social rented sector from 27 October 2025 whereby social landlords must address emergency hazards and damp and mould hazards that present a significant risk of harm to tenants to fixed timeframes.

Lawyer consulted: Natasha Watson

Date 4 May 2026.

8. Risk implications

- 8.1 Approving the Council Housing Asset Management Plan reduces risk by providing a single framework for priorities and trade-offs, and by making clear how the council manages uncertainty while the evidence baseline is still being strengthened. It supports the council's improvement journey, including formal intensive engagement with the Regulator of Social Housing following the C3 Regulatory Judgement of 9 August 2024 and the enhanced consumer regulation requirements.
- 8.2 The main delivery risks relate to the pace of survey mobilisation and the ability to gain access, capacity constraints across client and contractor teams, procurement lead times and mobilisation windows, and cost movement that can reduce reach. These risks can result in slippage, re sequencing and greater reliance on interim controls if they are not managed. The Plan sets out escalation triggers and review points for material changes, so changes are controlled, time bound and visible to residents and members.
- 8.3 Assurance is how the council checks that risks are controlled, work is completed properly and records can be trusted. Assurance is being strengthened. The Plan describes assurance already in place through monthly compliance performance reporting and exception review, system updates that support an audit trail, and survey quality checks and follow up actions.
- 8.4 The stock condition survey contract will be overseen through the council's contract management arrangements, with performance reporting through the Housing Safety and Quality Assurance Board. Over the next 12 months, the council will make assurance more consistent across programmes so completion evidence, record quality and follow through can be demonstrated more reliably.

9. Equalities implications

- 9.1 The Council Housing Asset Management Plan prioritises work using a risk and harm based approach. This includes considering vulnerability and health impacts, particularly where issues could escalate or cause harm if not addressed.
- 9.2 The plan recognises that not all residents experience services in the same way. Some residents face barriers to reporting problems and taking part in engagement, including access needs, language barriers, digital exclusion, caring responsibilities and concerns about feeling safe to report. The approach in the Plan is designed to be proportionate and deliverable this year. It uses more than one route to take part and sets a minimum feedback loop so residents can see what was heard and what changed.
- 9.3 Equality impact assessment requirements linked to specific programmes and major works will continue to be managed through the council's established equalities processes. This includes using equality considerations to inform

communication, access planning and the management of disruption, as part of the council's wider improvement journey.

10. Sustainability implications

- 10.1 The Council Housing Asset Management Plan supports longer term sustainability by protecting the life of buildings, reducing avoidable deterioration, and improving energy performance to meet regulatory compliance and also where works are viable and funded. This includes prevention work that reduces repeat failures and repeat repairs, which in turn reduces disruption and helps protect long term value.
- 10.2 The Plan supports the aim of warm, healthy homes through an evidence led approach to energy and carbon measures. It focuses on improvements that are practicable and affordable over time, and that can be maintained, with a clear balance between comfort, deliverability and disruption. Where renewable generation benefits residents, the plan supports building on delivery such as solar PV, and targeting future installations based on need and impact.
- 10.3 Sustainability choices will be kept aligned to the Housing Revenue Account affordability envelope and refreshed through the annual budget cycle as stock condition evidence improves and programme maturity develops.

11. Conclusion

- 11.1 Approving the Council Housing Asset Management Plan 2026 to 2027 will provide a clear, publishable and auditable framework for managing and investing in council homes and estate assets through the Housing Revenue Account. It supports the council's improvement journey including formal intensive engagement with the Regulator of Social Housing following the C3 Regulatory Judgement of 9 August 2024 and the enhanced consumer regulation requirements introduced in April 2024.
- 11.2 The council recognises it is not yet where it needs to be. Evidence maturity is still improving and there is more work to do to embed consistent, auditable landlord controls. This plan puts that framework in place now. It protects safety and legal duties first, strengthens stock knowledge and decision traceability, and sets a controlled annual refresh route aligned to the Housing Revenue Account budget cycle.
- 11.3 The Plan also sets out a deliverable approach to resident involvement and transparency so residents and members can see what is being delivered, what has changed and why. Cabinet oversight remains central to maintaining transparency, accountability and confidence.

Supporting documentation

Appendices:

Appendix 1 Council Housing Asset Management Plan 2026 to 2027

Brighton and Hove City Council

Council Housing Asset Management Plan

April 2026 to 2027



Contents

1. Executive summary	2
2. What this plan is and how to use it	5
3. The council’s commitment for managing council homes and assets.....	7
4. What the data tells the council about its homes and estates.....	9
5. What residents tell the council about their homes and estates	14
6. How the Council decides priorities for its stock	19
7. Rolling five-year investment view	21
8. One year delivery plan and capacity	25
9. Governance, assurance and reporting	27

1. Executive summary

This Council Housing Asset Management Plan sets out Brighton & Hove City Council's approach to managing and investing in its housing stock for the period April 2026 to December 2027. This approach is being taken while stock condition surveys are undertaken over the next two years and the information from these surveys will inform the development of a multi-year strategy. The plan forms part of an annual cycle aligned with the Housing Revenue Account budget process. It outlines how the council will maintain and improve council homes, blocks, communal areas and estates, and explains how residents can monitor progress and contribute to decision-making so that we achieve our ambition to be a Great Landlord.

What this plan covers

The plan covers housing assets funded through the Housing Revenue Account, including safety and compliance investment, planned and major capital funded works, and action to reduce repeat problems such as damp and mould.

Applying our learning organisation framework to managing our stock

Be connected

Effective housing asset management is not just about knowing the condition of homes. It is about how the council learns, improves and makes better decisions over time, so that homes are safe, decent, affordable to maintain and meet residents' needs. Using the Learning Organisation framework provides a clear way to do this consistently and transparently.

A connected approach to asset management means joining up data, insight and decision-making across housing management, repairs, compliance, finance, regeneration and resident engagement, and linking day-to-day operational learning (repairs, complaints, damp and mould cases, voids) directly into planned investment decisions and long-term strategies.

Be diverse and inclusive

Managing housing assets well requires listening to a wide range of lived experiences and professional expertise, so that resident and staff voice shapes priorities. Staff will recognise that different households experience building condition differently (for example, families with young children, disabled residents or older people).

3. Innovative and creative

A learning organisation approaches asset management as an evolving process, not a fixed plan.

This means using stock condition surveys, assurance activity and trend analysis to ask better questions, not just produce reports, testing approaches to planned maintenance, energy efficiency and compliance targeting — and adapting based on what works, and treating repeat

failures (for example recurring damp, drainage or communal system issues) as signals to rethink design, processes or investment logic.

Confident

A confident asset management approach allows the council to stand behind its decisions with clarity and credibility. This includes clear decision-making frameworks that balance safety, quality, affordability and long-term sustainability; transparent prioritisation, especially in a constrained financial environment; and confident communication with residents, members and regulators about what will be done, when, and why.

We will be an intelligent and strong client of contractors in relation to the stock condition survey and the work that arise from those surveys.

Healthy and psychologically safe – openness about risk and gaps

Strong asset management depends on a culture where people feel able to raise concerns early and honestly. For staff this means being transparent about what the council does and does not yet know about its housing stock as well as encouraging early escalation of asset-related risks without fear of blame; and as an organisation, treating regulatory findings, inspections and assurance as learning opportunities rather than solely compliance exercises.

Using the Learning Organisation framework helps shift the culture from “*managing buildings*” to “*learning how to be a better steward of homes and places over time.*” So that we become a Great Landlord.

What the council knows about its stock and why data matters

The council manages 12,761 homes as of April 2026, including Seaside Homes & council owned Temporary Accommodation. Flats, including bedsits, and maisonettes represent 65% of the council’s rented homes, building types that require more compliance activity. This includes 46 high-rise blocks of which are Large Panel System blocks, which do not currently meet modern safety standards. Over two thirds of council homes were built before 1970. The council also manages estate assets including 82 car parking sites with 1,895 spaces and 92 standalone garage sites with 1,068 garages. In addition, the council’s Housing stock includes, 162 commercial properties, such as shops on our housing estates.

The council’s Root Cause Analysis identifying the causes of compliance failures under the Regulator of Social Housing Safety & Quality Consumer Standard, found poor data reduced visibility of risk and weakened assurance. This plan treats good data as a control. It supports fair prioritisation, consistent risk management, and proof that work is complete and risk has reduced.

Whilst the stock profile is clear, the condition baseline is still being strengthened. Around 18.5 percent of council owned dwellings (as of February 2026) have a stock condition survey recorded on the NEC housing system. A condition survey contract has been commissioned to undertake a full survey of all council homes within two years, with mobilisation expected to begin in summer 2026 and completion of the full survey by the summer 2028.

What residents tell the council and how the plan responds

Residents consistently say they want repairs done right first time, dry homes with damp and mould tackled at cause, warm homes with reliable hot water, estates that feel cared for, hazards closed with evidence, and clearer updates with fewer surprises. The Plan uses these themes as tests for priorities, delivery standards and communication.

What is funded this year and how the five-year view works

The Plan publishes a rolling five-year investment view. Year 1 is committed with funding approved through the Housing Revenue Account (HRA). Years 2 to 5 are a planning view and will change as evidence and data improves, costs move and the delivery capacity is confirmed.

For 2026 to 2027, the Year 1 approved HRA capital programme budget is £79.640m with £46,699m profiled from previous years, providing a total capital budget of £126.339m. This covers: new supply, £76m; health and safety works, £17.7m; major works, £16.5m; planned works, £9.5m; energy and sustainability. £5.4m; and other capital items including housing adaptations and environmental and communal area improvement, £5.2m..

How the council decides what comes first

The plan uses a prioritisation ladder:

Priority 1 safety and legal duties.

Priority 2 homes and buildings at risk of major failure.

Priority 3 fixing causes and preventing repeat problems.

Priority 4 improving day to day living where evidence shows benefit and the budget allows.

Priority 5 longer term solutions where options must and will be tested.

What the council plans to deliver this year

Key Year 1 delivery focus includes mobilising stock condition surveys using the external consultants and developing the in-house team using early learning and service signals to improve targeting for planned works and prevention and strengthening our damp and mould pathway, so causes are identified, managed and solved earlier.

Safety action will not be delayed while building and developing the better data that we require and the systems for this are being built.

How residents can influence choices and track progress

The council's Root Cause Analysis found resident voice to be a key area, including with residents' concerns not always being heard early enough or used consistently to shape priorities and decisions. Resident feedback and influence are a key part of the evidence picture. Statutory resident consultation requirements will continue to apply. Residents can also influence investment that is not a safety requirement and where the council has discretion, mainly through sequencing and design choices within the approved budget constraints. The council will run quarterly resident budget sessions and use Housing Area Panels and other resident forums for engagement and involvement and provide meaningful feedback to all residents signposted through Homing In.

To keep reporting simple and deliverable, the council aims to publish a short plain English Homing In update after each quarterly resident budget session. The annual refresh will provide the year-end position and update the one year and five-year reviews.

How the council stays in control

Governance provides direction, delivery grip and assurance through established routes including Cabinet and the budget process, Overview & Scrutiny Committee, the Great Landlord Board, Housing Safety & Quality Assurance Board, Housing Leadership Team, safety and quality leadership routes, programme delivery groups, and resident engagement routes.

Assurance is strengthened.

Some assurance is already in place through monthly compliance reporting via Housing Safety & Quality Assurance Board, with Great Landlord Board, Corporate Leadership Team and Cabinet oversight. There are also exception reviews, system updates that support an audit trail, and survey quality and follow up actions. Over the coming 12 months the council will make this approach more consistent across programmes and our reporting and engagement.

2. What this plan is and how to use it

This is Brighton and Hove City Council's, Council Housing Asset Management Plan for 2026 to 2027. It is a one-year plan, refreshed annually. It explains how the council manages and looks after their homes and housing assets.

This plan does three things:



Sets the guidelines for investment and sequencing of works



States the evidence baseline and how it will improve



Sets out what will be delivered this year and the rolling five-year investment view

This plan covers all council housing assets funded through the Housing Revenue Account:



Council homes.



Blocks, communal areas and estates that the council maintains.



Asset related work that affects safety, condition, decency and long-term value, including planned and major capital work, compliance led work and damp and mould prevention.

This plan is built around three layers:

1

Stable framework: The decision rules, prioritisation ladder, confidence approach and assurance approach. This should not change often.

2

Rolling five-year investment view: A forward view of spend and reach, split into year 1 committed, years 2 to 3 planned, and years 4 to 5 indicative. This is refreshed annually aligned to HRA budget setting and approval.

3

One year delivery plan: This year’s deliverables, with milestones, key risks and mitigations, and actions to build capacity.

Annual refresh, in year updates and affordability

This is the first one-year plan. The council aims to refresh this plan each year, aligned to the Housing Revenue Account budget cycle and affordability envelope. The refresh updates the evidence baseline, risks and controls, the rolling five-year view and the one-year delivery plan.

3. The council’s commitment for managing council homes and assets

The Council Plan 2023 to 2027 outcomes include ‘Homes for Everyone’ and ‘A Responsive Council With Well Run Services’. The Housing Strategy 2024 to 2029 sets out priorities that include improving housing quality, safety and sustainability, delivering the homes our city needs, promoting health and wellbeing, and providing resident focused housing services.

This plan translates those priorities into the investment choices and delivery controls the council uses for council homes and estates through the Housing Revenue Account.

Priority 1 Safe, well managed homes and estates

The first commitment is to keep homes safe, well maintained and compliant, and to improve quality over time.

What this means in practice

- Safety and legal duties come first. Investment for compliance is protected.

- The council will manage safety and quality work with clear records and an audit trail, so risks are tracked, actions are owned, and work is completed with evidence.
- The council will build a Golden Thread method of working over time, so information is shared across teams and decisions are based on the best, up to date and accurate available evidence.
- Homes are measured against the Decent Homes Standard and the Brighton and Hove Property Standard, developed with residents. The local standard will be kept under review, so it stays aligned to resident priorities, regulation and available resources.
- The council will strengthen preventive and cyclical maintenance and improve the repairs service so repeat problems reduce over time. This includes focusing on fixing causes earlier and reducing avoidable repeat visits where practicable.
- The council will engage with residents and work with regulators to achieve and maintain compliance and improve performance.

What residents should notice over time

- Clearer programmes and better follow through when risks are identified
- Fewer repeat problems where causes can be fixed earlier
- More confidence that actions are closed properly and recorded
- Greater investment in proactive planned preventative maintenance programmes.

Priority 2 A sustainable Housing Revenue Account

The second commitment is to keep the Housing Revenue Account financially sustainable while supporting the supply of homes, including new council homes and homes that support homelessness duties and temporary accommodation.

What this means in practice:

- Investment plans will stay within the resources available and be tested through medium- and longer-term planning so the HRA remains sustainable as pressures change.
- The council will complete a more detailed review of financial risks and cost pressures, including compliance pressures and the challenges we need to manage for high rise and non-traditional housing stock, which is required to support the sustainable longer-term planning.
- The council will deliver new homes through a mix of routes, including building on council land, making better use of existing assets, and acquisition and buy backs, with a focus on homes that are safe, sustainable and maintainable over the long term.
- Where parts of the stock may become unsustainable to retain, the council will use an options appraisal to test the best approach. This may include reinvestment, alternative models, or regeneration. The council will engage early where practicable when viability issues are identified.
- The council will manage estate assets that affect affordability and investment choices, including car parks and garages, and will build forward plans for investment and maintenance over the next 12 months.
- The council will review options for blocks that are now fully leasehold, including whether releasing freeholds could reduce ongoing HRA costs, subject to consultation.

- Council owned temporary accommodation and the Seaside Homes portfolio form part of the asset base. The council will include these homes within stock condition and compliance evidence and will use updated information and financial planning to inform future options for Seaside Homes.

What residents should notice over time

- Clearer links between evidence, priorities and the annual budget
- Earlier visibility of difficult trade-offs, with reasons
- A more planned approach to supply, investment and major decisions

Priority 3 Warm homes and carbon reduction, delivered fairly

The third commitment is to reduce carbon emissions from the housing stock and support warm, healthy homes, while balancing affordability, disruption and deliverability.

What this means in practice

- The council will plan energy investment using a low carbon approach, so decisions are evidence based and affordable over time. Improvements to the building fabric that improve energy efficiency will be embedded into Planned Programmes, Major Works and repairs wherever possible.
- The council will improve energy performance in line with new Minimum Energy Efficiency Standards for social housing (minimum EPC C) by 2030. Improvements will be made that are practicable and affordable, focusing on measures that improve comfort without inadvertently increasing running costs for residents.
- The council will increase renewable energy generation where it benefits residents, building on delivery such as solar PV and sustainable energy solutions and will target future installations based on need and impact.
- The council will design new homes to high sustainable standards, so they remain fit for the future and avoid costly retrofits later, using circular economy approaches where practicable.
- The council will also reduce carbon from its own activities linked to delivery and will consider supporting infrastructure such as EV charging where appropriate.

What residents should notice over time

- Clearer information about what sustainable options mean for comfort and bills, and how disruption will be managed
- A steady shift towards homes that are easy to heat and healthier to live in, where improvements can be delivered

4. What the data tells the council about its homes and estates

The council wants residents to have safe, high-quality homes they are proud to live in. To do that, the council needs reliable information about what it owns, what condition it is in, what risks exist, and what work has already been completed.

The council's published [Root Cause Analysis](#) is clear that poor available data was a root cause of past compliance failures. Records were incomplete and information about the same building sat in different systems that did not integrate. This reduced visibility of risk and weakened assurance about stock condition, maintenance activity and investment priorities. The analysis also explains that it became normal to rely on individuals' memory and experience rather than up to date records. This meant decisions were harder to evidence and risks were harder to manage consistently.

Good data is not paperwork. It is how the council prioritises fairly, manages risk consistently, and proves that work is complete and the risk has reduced. It is also how the council shifts from repeat reactive repairs to prevention investment, by using patterns in repairs and inspection findings to target the right work in the right homes and blocks and build programmes based on evidence and reliable data.

Stock profile and what it means

The council is responsible for a large housing stock the majority of which are flats, with high rise blocks and many older homes. This makes shared systems, communal areas and access planning central to keeping homes safe and in good repair.

The council's current housing stock profile as of April 2026 is 12,761 homes. This includes council owned temporary accommodation and Seaside Homes.

The mixture of dwellings is mainly flats within blocks. There are 7,509 flats and 4,178 houses, plus 641 bedsits, 184 maisonettes and 249 bungalows. The stock includes 46 high rise blocks. [Asset Overview doc.pdf](#).

In addition to rented homes, the council is responsible for a large leasehold portfolio and related wider housing assets. Housing Revenue Account papers provide the baseline used for financial planning and include leasehold dwellings, car parking units and other estate assets. The council's Housing stock also includes, a commercial property portfolio of 162 premises/units alongside the housing stock, such as shops on estates. Our lease arrangements for our commercial stock are on a full repairing basis, however we have a responsibility for compliance areas, such as electric, water, asbestos and fire. In the main our commercial properties are within the demise of a block or residential properties, we do have a responsibility for the maintenance and repair of the building as a whole and our planned works programmes address this.

Blocks mean shared systems and shared spaces. When a roof, drainage run, communal service, entrance door or other shared element fails, more than one home can be affected. This increases the importance of prevention, clear access arrangements and good coordination across homes and communal areas.

Age profile of the stock

Over two thirds of homes in our stock were constructed before 1970. In line with the council's previous housing asset management strategy, we will include an age band profile of the stock in order to support planning for building fabric, component life and lifecycle cost.

Older homes are more likely to have key components at the end of their life and can cost more to maintain over time. This strengthens the case for verified component data, clear replacement planning, and using repairs patterns to target prevention work where failures repeat.

Homes used for temporary accommodation and Seaside Homes

The council owns 316 homes used as temporary accommodation held within the Housing Revenue Account. Seaside Homes comprises 499 homes and remains in the council's freehold ownership. These homes are part of the asset base and sit within the council's responsibilities for safety and standards. They are included in stock condition evidence and investment planning and included within our repairs and capital works programmes.

Estates, car parks, garages and wider estate assets

Housing manages estates and related assets, including 82 car parking sites containing 1,895 car parking spaces and 92 stand-alone garage sites containing 1,068 garages. We also have a responsibility to maintain 44 community rooms that are on our estates or within blocks.

Estate assets are part of the Housing offer. They need clear standards for safety, maintenance and investment alongside individual homes and blocks. These assets contribute to affordability and investment choices as well as opportunities for income generation or for review of usage, considerations that support the requirement for a more strategic approach to management, occupancy and investment..

Adaptations and specialist housing

The council manages a range of homes and services alongside general needs rented homes, including adaptations and specialist housing. These form part of the council's responsibilities for safety and standards and must be included in stock condition evidence, investment planning and programme decisions as the evidence baseline strengthens. Our seniors housing is an essential part of our stock for meeting the requirements of residents as are adaptations and support options that enable the council to support residents to continue to live independently in their homes for as long as possible.

Complex stock and structural risk

The council has eight Large Panel System blocks for which detailed structural surveys were commissioned. The reports identified that the blocks failed the requisite criterion for structural stability for Large Panel System buildings and recommended structural repairs in the short and long term to avoid risk in the event of an explosion or major fire. Interim measures were put in place, so the buildings remain safe to occupy while longer term decisions are taken.

The eight blocks are Dudeney Lodge and Nettleton Court in Hollingdean, Falcon Court, Heron Court, Kestrel Court, Kingfisher Court and Swallow Court in North Whitehawk, and St James House in Kempton.

There is no immediate risk to the buildings and controls are in place, including full removal of gas supply and a ban on gas canisters and barbecues. Acting on independent advice, the council introduced

additional interim safety measures across the eight blocks. These include restrictions on e-bikes and e-scooters within the buildings with alternative storage provided, monitored CCTV and onsite security, and changes to car parking and garage use in affected locations. Temporary heating plant was also put in place at St James House to allow the relocation of the communal heating supply from under the block. The original strategy also describes interim changes affecting specific nearby car parks and garages linked to the blocks.

A decision was taken by Cabinet in July 2025 to regenerate the blocks. Work is underway for the buyback of leasehold properties, tenant relocation planning and developing the future approach, with a resident led approach and ongoing consultation.

This is a clear example of how specialist evidence is used to identify risk, put interim controls in place, and take long term decisions through Cabinet. It also reinforces why strong stock intelligence is essential across the wider portfolio, so risks are identified early and managed with evidence, not hindsight.

Condition evidence today and what will change in the next two years

The stock profile is clear. The stock condition baseline still requires strengthening.

The council has moved away from intermittent stock condition surveys and cloned data towards a rolling programme of survey visits to homes and blocks, aiming for coverage of 20 % of council homes per year.

Progress has been slower than expected. As of February 2026 18.5 % of council homes had a stock condition survey recorded on the NEC housing system. Cabinet agreed in December 2025 to procure and award a Condition Survey Contract to complete a survey of all council homes within two years to ensure that the council has accurate and up to date property level stock condition data based on physical inspection of homes. Mobilisation is expected to begin in summer 2026, with completion by summer of 2028.

The external commission will be supplemented by the internal team of Stock Surveyors to ensure that we capture all homes and quality check.

Over the next two years, the council intends to move to a full, consistent survey baseline that better supports investment planning and assurance. In the short term, the council uses a combined evidence base, including existing surveys, data on new capital works installations, compliance information, repairs history and other forms of information gathering, to identify repeat failures with the intention to target investment and prevention work.

How the council builds the evidence baseline

The council builds its picture of stock condition by combining what it sees on inspection with what our services are reporting and what residents are experiencing.

Full stock condition surveys are the strongest source for us to understand our properties. They record the condition of key building elements inside and outside the home and capture related health and safety risks through Housing Health and Safety Rating System (HHSRS) reporting.

Surveyors record surveys on handheld tablets and update the shared housing database in NECH so teams across Housing can use the same information. Surveys also trigger action. They can raise repairs referrals and refer issues such as damp and mould for specialist follow up, supported by photos and other details. Surveyors also carry out block level surveys so communal elements are captured.

The previous housing asset management strategy outlines survey delivery in geographic areas, an approach that will be reflected upon and reviewed in our work toward the updated housing asset management strategy. Residents are contacted in advance about surveys, and findings and trends are reviewed when an area's coverage is completed so planned investment can be targeted where it is needed most. It also notes that surveyors can identify wider issues that require follow up, including wellbeing concerns, alongside the condition and safety risks.

Other visits add to the picture and help spot risk early. This includes empty homes checks, cyclical gas and electrical activity, capital works surveys and delivery, repairs visits, damp and condensation inspections and other officer visits. These do not replace full surveys, but they provide useful evidence while survey coverage is still building.

How evidence informs decisions

The council uses the evidence baseline to do three things.



Confirm condition and risk: Decide what work is needed and define the scope.



Spot patterns early: Use repairs and repeat repairs, damp and mould cases and other service signals to identify repeat failure and target prevention work.



Test plans against lived experience: Use estate and block inspections and resident feedback to check whether issues are being felt on the ground and whether the planned response is landing.

Evidence triangulation and interim controls while survey coverage is improving

Until survey coverage is complete, the council uses the best available evidence to manage risk and plan investment. Some cross checking already happens in practice. Over the next 12 months, the council will make this approach more systematic, so decisions are consistent and evidence led.

The council will build a consistent approach that brings three evidence tiers together.

Tier 1 Direct inspections

Stock condition surveys, targeted inspections and statutory compliance inspection outcomes. These confirm condition and risk and help define scope. The council will strengthen quality checks, clear inspection dates and processes for replacing older records.

Tier 2 Service signals

Repairs and repeat repairs, damp and mould cases, empty homes findings, planned works history, complaint's themes and outcomes of Ombudsman enquiries. These help spot patterns early and

target inspections and prevention work. The council will introduce light touch trend reviews and exception flags, with sampling where capacity allows.

Tier 3 Local and lived experience

Block and estate inspections, resident feedback themes, member casework and frontline observations. Inspections and feedback such as these provide us with live information from our residents and flag emerging risks. The council will follow up where concerns persist and the risk is quantified.

Not every decision is based on complete evidence while survey coverage is still improving. The council will be clear about what evidence was used, how confident the council is with that, and what will be done next to strengthen confidence.

While the evidence baseline is still developing, the council applies the following controls.

- Safety and legal duties come first
- Known higher risk building types and known failure patterns are prioritised for inspection and early action
- Damp and mould requests and patterns trigger targeted inspection and work to address the cause, not just repeat repairs
- Key building elements are protected where failure would accelerate deterioration and increase long term cost
- Where access cannot be gained, the council follows its no access process and uses other evidence sources until a full survey can be completed

What the council will build over the next 12 months

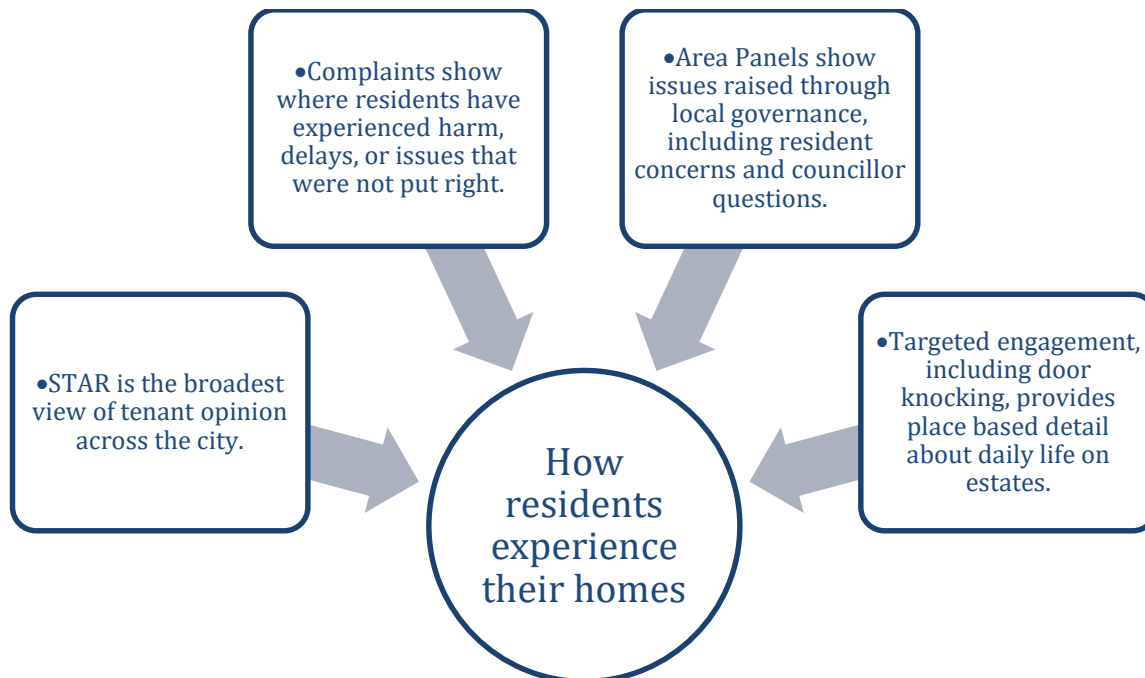
To make this approach more systematic, the council will focus on practical steps that are deliverable within current capacity and can be evidenced.

- Use the survey mobilisation programme to improve direct inspection coverage, with quality checks in place
- Agree a single evidence note format for material decisions, including confidence grading and review date
- Introduce a light touch quarterly trend review using repairs, damp and mould and complaint's themes to identify hotspots
- Improve how completed works are recorded so actions are closed with evidence and an audit trail

5. What residents tell the council about their homes and estates

Residents experience the stock as a home, not a dataset. What residents tell the council is often the first sign that something is failing. It also shows the real impact when problems are not put right. The council treats resident insight as evidence. It helps target inspections, shape investment choices, and test whether improvements are being felt.

The council uses four main routes, because each tells a different part of the picture.



The council draws on several routes because each shows a different part of the picture. Taken together, they help the council do four practical things.



Target surveys and inspections, including repeat problem areas



Sequence non safety investment where there is a choice



Set quality expectations for works, including completion evidence and follow up checks where needed



Improve communication, access planning and disruption management

What residents say matters most

Across all sources, residents consistently tell the council the same things matter most to them. The council will use these themes as tests when setting priorities, sequencing work and setting delivery standards.

Repairs that fix the problem, not repeat it

Residents want repairs completed properly first time, with appointments kept, reduction in repeat appointments, clear updates and good quality work. Over the next 12 months, the council will build a more systematic way of using repairs history and long running cases to identify repeat problems and target prevention work.

Comfortable dry and secure homes, with damp and mould dealt with at the cause

Residents want damp, mould, leaks and water ingress tackled at source. The council will use repeat cases, repairs records and survey findings to prioritise moisture management and bundle the right works, not only treat symptoms.

Warm homes with reliable hot water services

Residents want rapid action when heating or hot water fails, especially where vulnerability increases risk. The council will use breakdown history and repeat failures to help target replacement decisions and improve follow up processes and actions..

Estates and communal areas that feel cared for

Residents judge the landlord through cleaning, lighting, paths, bin areas, pests and secure access. The council will use estate inspection findings, Housing Area Panel issues raised and complaint's themes to help target estate-based investment and maintenance.

Visible hazards closed quickly and with evidence

Residents raise hazards such as electrical issues, water ingress or leaks, fire and safety concerns. The council will triage these quickly, assess risk, and close actions with evidence. Where a risk remains, the council will be clear about what mitigation is in place in the meantime.

Clear updates and fewer surprises

Residents want to know what is happening, when, and what changes if plans slip. The council will improve how it explains next steps, changes and review dates, especially where changes are material.

Safe and accessible routes to report and take part

Some residents do not feel safe or confident reporting issues, sometimes due to language barriers or fear. The council will build safer and more accessible routes and will use targeted engagement to understand and reduce barriers.

Planned works that feel predictable and fair, including for leaseholders

Residents want clearer local plans. Leaseholders want confidence in quality, guarantees, consultation and documentation. The council will improve planned capital works information over time and will follow statutory consultation requirements for major works as the foundation not the ceiling for consultation, also seeking to follow and further develop our enhanced engagement approach.

What STAR 2025 to 2026 tells us

STAR 2025 to 2026 shows tenant perception is improving. Overall satisfaction is 71 %, up 4 percentage points. Repairs satisfaction and the measure on whether the council listens and acts have both improved. Complaints handling remains the lowest scoring area, although it has improved. 62% of tenants feel they have a say in how services are run. Benchmarking places the council in the top quartile for eight measures compared with other councils with more than 10,000 homes.

This supports the plan's focus on reliability, clearer communication and a visible feedback loop. It also underlines that there is more work to do, especially on complaint handling and consistent follow through.

Improving engagement and the feedback loop over the next 12 months

The council recognises engagement and feedback loops are not yet consistent. This year will be focused on putting the foundations in place so resident insight is gathered in a more structured way, used consistently in decisions, and reported back in a way residents can see how their input has influenced decisions and services.

The council's commitment for the next 12 months

The council will focus on a small number of changes residents should feel in day-to-day life.

- Safety and legal duties come first
- The council will be clear about what residents can influence and what they cannot
- The council aims to share regular updates on progress, including what changed, why, and what happens next
- The council will refresh this plan each year, linked to the Housing Revenue Account annual budget cycle

Some work is not optional. Safety and statutory compliance works must be completed. Residents can influence pace, quality, communication, access arrangements and how disruption is reduced. Where there is discretion, residents can influence sequencing and design choices for non-safety investment within the approved budget.

How residents will shape choices this year

This year the council will run quarterly budget meetings with residents. These sessions will include discussions about homes, what residents are experiencing, and the choices the council can offer and make within the approved budget.

To keep this deliverable and meaningful, the council will use the following clear routes for input.

- Quarterly resident budget sessions
- Housing Area Panels
- Feedback signposted through Homing In
- Resident Engagement Strategy
- Focus group resident meetings

Minimum feedback loop and how residents will track it

After each quarterly resident budget session, the council aims to publish a one-page plain English summary that shows what residents said and what happens next, including what could not change and why. The council will also summarise what residents influenced through the annual refresh of this plan.

What residents can influence

Residents can influence non safety investment where the council has discretion, mainly through sequencing and design.

Examples of decisions that residents can provide input and share their priorities around communal improvements for consideration into our programmes include:

- Estate and communal improvements within the available budget
- Input into pre project plans and programmes
- Which repeat problems are targeted first within prevention work
- Residents can share concerns and priorities on how we plan and group works in our programmes to reduce disruption
- What information residents get before, during and after works
- What feels fair when plans change, and what mitigations matter most

Residents cannot decide whether the council meets legal duties. Safety and statutory compliance are not optional. Residents can influence how the council delivers that work, including communication, access planning, disruption controls and sequencing and specification of work where there is a choice.

What residents will notice	How the council will show progress
Clearer updates on safety programmes, what happens next and where access is needed	Updates explaining progress, exceptions and what mitigation is in place while risk is managed
Clearer planned works information over time, including what is planned locally	Published planned works information, with changes explained where plans move
Fewer surprises when plans change, and clearer explanations of why	A clear summary of material changes, why they happened and the next review point
Proof that resident feedback changed something	A one page “you said, we did” summary after each session where practicable, with a record kept
Clearer ways to take part, including for people who do not attend meetings	Published dates for the next sessions, Area Panel update dates, surveys, development of more on-line engagement options, and the Homing In feedback route

Quarterly rhythm linked to the Housing Revenue Account cycle

April to June

Launch of the Plan and early delivery opportunities and risks. Resident input on sequencing and design choices where there is discretion. Publication of “you said, we did” and any material changes explained.

July to September

Midyear update and emerging themes. Resident input on which estate issues come first and how disruption is reduced. Publication of “you said, we did” and a progress update.

October to December

Draft options for next year. Resident input on what should be protected, and which trade-offs feel fair. Publication of “you said, we did” and draft priorities for discussion.

January to March

Proposed plan for the year ahead linked to HRA budget setting. Final resident input on non-safety sequencing and communications before budget decisions. Publication of “you said, we did” and a clear summary of changes.

6. How the Council decides priorities for its stock

There is more investment required than the council can deliver at once. This section explains how the council makes choices that are consistent, explainable and affordable. It is designed to protect safety and legal duties first, while making any discretion clear.

The prioritisation ladder

The ladder is the council’s shared way of sorting work. Every material decision is traceable to one priority. If something does not fit, the council will challenge whether it should go ahead.

Priority	Meaning in plain English	Examples of work
1 Safety and legal duties	Work the council must do to keep people safe and meet the law. This comes first and is protected.	Fire safety actions and statutory compliance works following inspections. Urgent hazard controls.
2 Homes and buildings at risk of major failure	Work needed to stop homes falling below basic standards or buildings failing.	Failing roofs, structure, external fabric, or building services where breakdown would cause serious harm or rapid deterioration.
3 Fix the cause and prevent repeat problems	Work that stops the same problems coming back and reduces harm over time.	Damp and mould work that address the cause. Works to stop recurring leaks. Targeted work in repeat repair hotspots.
4 Improve day to day living	Improvements to shared spaces and estates where evidence shows benefit and the budget allows.	Communal and estate improvements that improve safety, security, accessibility or cleanliness.
5 Longer term solutions	Decisions where routine investment is not the right answer and options must be tested.	Options appraisals for complex buildings. Major remediation choices. Regeneration or disposal decisions.

Decision guidelines when priorities compete

These guidelines apply across repairs, compliance, damp and mould, planned works and major projects.

Higher priority comes first

A lower priority can only override a higher one if there is a recorded, time limited exception that states why, what is being done in the meantime, and when the decision will be reviewed.

Priority 1 is protected

When budget or capacity is constrained, the council slows or pauses lower priorities first, so safety, regulatory and legal duties remain deliverable.

Within a priority, preventing harm comes first

The council prioritises by likely harm, including Housing Health & Safety Rating System hazards, vulnerability, health impact, and the risk that the issue escalates if it is not addressed.

Fix the cause where possible

Where there is a choice, the council prioritises permanent fixes that remove the cause of failure over controls that rely on repeated attendance or tight ongoing management.

Reduce repeat failure and repeat disruption

Where it does not conflict with priorities 1 and 2, the council prioritises work that reduces recurring issues and avoids repeat visits, repeat disruption and supports planned preventative solutions.

Deliverability is part of the decision

Access, procurement lead times, legal implications, contractor capacity, decant requirements and dependencies are considered. Where deliverability limits pace, the council re sequences transparently and puts interim controls in place.

Stay within the approved affordability envelope

The council prioritises within the approved Housing Revenue Account budgets and governance decisions. Where costs rise or new duties emerge, the council retests priorities and escalates decisions through governance.

The council does not wait for perfect information to manage risk. Decisions are made using the best available evidence.

Material trade offs

Material trade-offs are recorded so it is clear what changed, why, and when it will be reviewed. They are reviewed through the annual refresh, and earlier if a trigger occurs.

A trade-off is material if it:

- Delays Priority 1 delivery
- Changes a published commitment

- Affects a whole block or estate
- Increases reliance on interim controls
- Creates significant disruption, including decants
- Has a material affordability impact

Worked examples

Example 1 Safety comes first

Fire safety actions are required in a block. Kitchen and bathroom replacements are also due. Fire safety is Priority 1. Kitchen and bathroom replacement is usually Priority 2. The council protects Priority 1 delivery and re sequences Priority 2 work, starting with homes where failure is causing the most harm. Where a delay could increase harm, the council uses time limited interim controls such as targeted inspections or short-term repairs or other mitigation until planned replacement.

Example 2 Two non-safety options compete and residents influence sequencing

Two estate improvement options both sit in Priority 4, but the available budget will not fund both this year. The council uses evidence on harm and recurring problems to narrow the choice, and residents influence sequencing and design within that constraint. The council sets out the options in plain English, including what is in scope and what is not. The council then records the decision and review date and explains what changed as a result.

7. Rolling five-year investment view

This section sets out the council’s rolling five-year view of Housing Revenue Account capital investment. It is refreshed every year through the budget setting process. It separates what is funded now from what is planned next and what is still indicative.

The council approves Year 1 capital funding through the HRA budget process. Years 2 to 5 are published as a planning view and are refreshed each year as evidence, costs and delivery capacity change.

Cabinet has approved a new capital programme budget of £79.640m for 2026/27 financial year, within a revised capital budget of £126.339m. Cabinet has also approved earmarking £1m of reserves against disrepair claims for 2026/27.

Year 1 committed budget 2026 to 27

Programme	Year 1 committed budget	What it covers
New supply	£72.056m	Acquisitions and delivery programmes including Home Purchase Policy, Local Authority Housing Fund, Large Panel System buy backs, small sites delivery, and named schemes within the Housing led programme

Health and safety	£17.731m	Fire safety and asbestos management, fire doors, electrical compliance testing and rewires, condensation and damp works, lifts, and water safety
Major works	£16.469m	Major project workstreams and structural repair activity, plus projects to be confirmed in later years
Planned works	£9.468m	Door entry and CCTV, ventilation and lighting systems, cyclical repairs and decorations, kitchens and bathrooms, windows, roofing, gutter clearance, and service risers
Sustainability	£5.365m	Domestic and communal heating improvements, energy efficiency and low carbon heating, solar PV, and cavity wall insulation
Other	£5.250m	Disabled aids and adaptations to homes to support independent living minor capital works, major empty property works, and environmental improvements

The number of homes that will benefit from the capital works programmes in 2026/27 is 973. Our proposed programme of major capital works for the current and future years is included in the appendix Majors Five Year Programme [Majors 5 Year Programme.docx](#)

What the capital programme is designed to achieve

The programme is used to keep residents safe, protect the life of buildings and improve quality over time. It also helps reduce repeat problems and avoid higher long-term costs.

[Protect building fabric and reduce repeat repairs](#)

External repairs and decoration maintain the outside of buildings and can reduce responsive repairs by addressing common failures earlier.

[Improve windows and roofs to protect homes](#)

Window replacement and roofing programmes protect building fabric and support better insulation and energy efficiency, helping reduce condensation and damp risk.

Keep homes to standard through targeted replacements

Decency and property standard replacements keep homes to standard. Detailed surveys are used ahead of programmes to confirm which homes meet replacement criteria.

Manage complex stock and major projects safely

Major works and options appraisals are used where routine investment is not the right answer and longer-term decisions are needed.

Support warm homes and sustainability measures where viable and funded

Energy investment supports warm homes, affordable bills where possible, and longer-term sustainability where works are viable and funded.

Programme maturity over the next 12 months

The council is not yet in a position to publish a detailed five-year schedule for each programme line across all assets. Over the next 12 months the council will strengthen programme detail by improving stock condition evidence, increasing survey coverage, and improving the link between surveys, repairs trends and planned works targeting. The annual refresh will publish a stronger programme view, including clearer scope and sequencing assumptions.

How to read the five-year view

Year 1 committed: Budget approved for the year, with a delivery route in place. Delivery still depends on access, procurement and contractor capacity.

Years 2 to 3 planned: The council's current planning position for the next two years. It is expected to proceed, but scope and reach can change as survey evidence improves, costs move and delivery capacity is confirmed.

Years 4 to 5 indicative: The direction of travel based on best available evidence and current affordability planning. It is re tested at each annual refresh.

Programme line	Why it matters	Year 1	Years 2 to 3	Years 4 to 5	Confidence	Key dependencies
Safety and statutory compliance	Life safety and legal duties. Protected investment.	Committed	Planning view	Indicative	Medium to high	Access, capacity, enforcement action, quality of records
Damp and mould and health risk works	Prevents harm and reduces disrepair and meets regulatory requirements	Committed	Planning view	Indicative	Medium	Diagnostic capacity, access, pathway maturity
Fabric programmes including roofs, windows and externals	Protects building life and reduces repeat repairs.	Committed	Planning view	Indicative	Medium	Survey uplift, procurement, scaffolding and packaging
Decency and property standard replacements	Keeps homes to standard and reduces long running defects when targeted.	Committed	Planning view	Indicative	Medium	Access, supply chain, sequencing with other works
Blocks and communal assets	Reduces block liabilities and improves day to day living where affordable.	Committed	Planning view	Indicative	Medium	Block survey coverage, access, consultation
Energy and carbon	Supports future compliance with Minimum Energy Efficiency Standards, EPC C requirements, affordability and carbon reduction where viable and funded.	Committed	Planning view	Indicative	Low to medium	Archetype suitability, grants, supply chain, grid and building constraints
Major options and complex assets	Ensures complex decisions are controlled and evidence led.	Committed	Planning view	Indicative	Medium	Options appraisal capacity, affordability, resident engagement
Leaseholder major works and consultation	Ensures fairness and legal compliance on major works. The council will follow statutory consultation requirements, enhance engagement, explain options, scope and costs.	Committed	Planning view	Indicative	Medium	Consultation timetables, disputes, cost movement
Enablers	Improves evidence and delivery control where capital funded.	Committed	Planning view	Indicative	Medium	Mobilisation, recruitment, systems integration

8. One year delivery plan and capacity

This section sets out what the council plans to deliver this year, what could delay delivery, and how residents will be kept informed. It is the delivery plan for the Year 1 committed programme set out in Section 7.

What the council will publish

To keep reporting simple and deliverable, the council aims to publish one short plain English update in Homing In after each quarterly resident budget session. This will include:

The annual refresh of this plan will provide the year end summary of delivery and the updated one year and five-year investment view.

We will publish and provide updates on our web site of this plan and our programmes providing details of these and how we are progressing.

Surveys and evidence building this year

The council plans for stock condition surveys to start from July 2026 and to complete a full survey of all properties within two years. If mobilisation slips or access rates are lower than planned, the council will:

- Focus surveys first on higher risk homes and blocks
- Increase targeted inspections triggered by repairs, damp and mould cases, complaints and disrepair risk
- Use interim controls so safety and health risks are managed

The council will not delay safety action while it waits for better data.

Delivery milestones

Quarter	What the council plans to deliver	What residents should notice	How the council will show progress
May to July	Mobilise stock condition surveys, including quality checks and the access approach	More survey appointments, with clearer letters and reminders	Update confirms mobilisation status and early completions
May to July	Hold the first quarterly resident 'Budget and asset management' session and share the key messages with all residents.	A plain English update that shows what happened and what changed	Resident update shared, including any re sequencing explained

Quarter	What the council plans to deliver	What residents should notice	How the council will show progress
Jul to Sep	Use early survey learning and service signals to update targeting for planned works and prevention	Clearer targeting, with an explanation of what changed and why	Resident update explains what changed in targeting and why
Jul to Sep	Strengthen the damp and mould pathway so causes are identified earlier 'Budget and asset management' session	Clearer next steps after reporting damp and mould	Resident update includes pathway changes and a small number of hotspot actions
Oct to Dec	Share the mid-year delivery position, including any material trade offs	Clear explanation of delays and new dates, with reasons	Resident update includes material changes and the next review point
Oct to Dec	Share the early shape of next year's non safety priorities 'Budget and asset management' session	Earlier visibility of options and trade offs	Resident update explains what is in scope to influence
Jan to Mar	Publish the year end position and carry overs	Clear close out, not a reset	Annual refresh sets out what was delivered, what moved, and why
Jan to Mar	Refresh the plan for the year ahead, aligned to the HRA budget setting cycle 'Budget and asset management' session	Clear link between evidence, priorities and budget	Updated plan published as part of the annual refresh cycle

Building capacity and capability

This year includes steps to strengthen capacity that supports delivery. Some elements depend on recruitment, procurement and existing resources, so the council will be clear about what is in place and what is being built.

Capability area	What the council will do this year	Why it matters	How the council will show progress
Evidence capacity, surveys, quality and analysis	Mobilise surveys, put quality checks in place, and establish a baseline update process. Build capacity so survey learning changes targeting decisions	Data is only useful if it changes what the council does	Updates show survey progress and what survey learning changed
Planned works delivery capacity	Strengthen programme management capacity for major and planned capital works programmes	Surveys will identify need. Without capacity, delivery will slip	Capacity actions and delivery grip reflected in updates over time
Damp and mould root cause capability	Strengthen diagnostics and the hand off between repairs and planned works, so causes are fixed earlier and delivery capacity is increased	Reduces repeat cases and repeat disruption	Updates include hotspot actions and trend position
Procurement and contract management capacity	Maintain a forward looking procurement plan , robust contract performance grip and build capacity to deliver works	Procurement delays are a common cause of slippage	Updates reflect key procurement milestones and any impacts
Engagement capacity and quality	Publish session dates early and widen participation beyond usual attendees	Resident engagement must be credible and influence decisions and service delivery	Updates include what residents said and what changed
Options and decision capacity for complex assets	Set clear decision points and decision record discipline for complex assets and major choices	Prevents drift and unmanaged interim controls	Decisions and review points reflected through governance reporting

9. Governance, assurance and reporting

Governance has three roles.

Direction and decisions: Agree budgets, approve major decisions, and set direction.

Delivery grip: Track delivery, remove blockers, and make changes visible.

Assurance: Check that records can be trusted, work is completed to the right standard, and risks are controlled.

Forum	What it is responsible for	Decisions it can make	Typical escalations to this forum
Cabinet and full Council budget process	Approves the HRA budget and major strategic decisions	Approves Year 1 HRA capital budget and material changes to budgets or approach	Major budget change, major long-term options decisions, decisions with significant leaseholder impact. Decisions of over £1m value and / or effects 2 or more wardsi
Overview & Scrutiny Committees	Cross party review, challenge and assurance	Reviews decisions, policies and performance,	Reports may be taken to Scrutiny for review before decision or may be called in by Scrutiny for review.
Great Landlord Board	Strategic assurance across linked improvement programmes	Agrees priorities for attention, confirms cross service actions and escalation	Cross programme blockers, material delivery confidence issues, material trade-offs requiring senior direction
Housing Leadership Team	Housing wide delivery assurance	Agrees recovery actions, owners and timescales within approved budgets	Delivery slippage, capacity gaps, access failure affecting safety, contractor underperformance
Housing Safety and Quality Assurance Board	Compliance monitoring and assurance on safety and quality controls	Agrees interim controls and technical approach for safety and quality delivery	New or increased safety risk, enforcement action, weaknesses in compliance or closure evidence for safety actions
Programme delivery groups	Day to day delivery management	Mobilisation, sequencing and performance management within agreed programmes	Programme slippage, procurement delays, quality failures, resource gaps
Resident engagement routes	Tracking progress and shaping	Influences sequencing and	Issues residents say are not improving, concerns

including Area Panels and quarterly resident sessions	choices where there is discretion	design choices where there is discretion and challenges	about fairness, quality, disruption, follow through
		disruption plans	

Reporting cadence and how residents can track progress

The council will keep reporting simple and consistent so residents can track progress and see what has changed and why, including exceptions.

After each quarterly resident budget session linked to the Housing Revenue Account budget cycle, the council aims to publish a short plain English update in Homing In. It will summarise what was discussed, what residents said, what will change as a result where there is discretion, and what happens next.

Once a year, the council will publish an annual refresh of this plan. This will set out what was delivered, what changed and why, what has moved into the next year, and the updated one year and five-year investment view.

Reporting frequency

Reporting product	What it is for	Frequency	What it will always include
Resident update following quarterly resident engagement session	Public update on delivery, changes and next steps	Quarterly	Delivered, slipped and why, re sequencing and review dates, exceptions, learning and what changes next
Quarterly resident engagement sessions linked to the HRA budget cycle	Resident input on sequencing and design choices where there is discretion	Quarterly	What is in scope to influence, constraints, options where relevant, and what will be published after
Housing Area Panel updates	Local issues and estate priorities	Quarterly	Local progress, local exceptions, next steps
Annual refresh linked to the HRA cycle	Updated baseline, updated investment view and updated delivery plan	Annual	What changed, why it changed, and what happens next

Assurance activity and proportionate checking

Assurance is how the council checks that work is satisfactory and compliant, records are reliable, and risks are controlled. It focuses on completion evidence, quality, and follow through.

The council is strengthening its assurance approach. Some assurance activity is already in place through management reporting, system updates and governance. Over the next 12 months the council will build a more consistent approach across programmes.

What is in place now

- Monthly compliance performance reporting
- Key compliance areas are monitored through monthly performance reporting and
- exception review by service leadership.

Clear closure and audit trail through system updates

Teams update the housing system when work is completed so actions can be closed with evidence and there is a clear audit trail.

Survey quality and follow up actions

Surveys are recorded into the housing system, supported by photos and details where needed. Surveys trigger referrals for repairs and specialist follow up, including damp and mould cases. When coverage for an area is completed, findings and trends are reviewed and used to target investment.

Formal governance review

Progress against this plan is reviewed through Housing Safety & Quality Assurance Board for compliance purposes, through the normal delivery assurance routes, and through the annual refresh.

How findings feed improvement

The council will use learning from assurance activity, resident feedback and service experience to improve delivery and target investment more effectively. This will include:

- Reopening and completing actions where work is not properly closed
- Improving processes, training and contract management where issues repeat
- Adjusting targeting where repeat problems show a prevention opportunity
- Improving communications and access planning where residents report avoidable confusion or disruption

The council will also strengthen the learning loop by:

- Updating the housing system when works are completed so impacts on standards, future budgets and energy efficiency can be tracked
- Reviewing findings and trends when survey coverage for an area is completed and using this to target planned investment

- Improving publicly available information about planned programmes as programme maturity improves

Key risks will be reflected in the housing risk register and reviewed through the council's normal corporate risk route.

Leaseholders and planned & major works

Where major works affect leaseholders, the council will follow statutory consultation requirements and agreed enhanced early engagement practice. Where practicable, the council will also use existing involvement routes to support early awareness ahead of formal consultation, including residents' associations, the Leaseholders Action Group, Housing Area Panels and our resident engagement strategy will provide regular resident meetings and method of resident engagement including updating.

Triggers for escalation and re sequencing

Issues will be escalated and work re sequenced when risk, affordability or deliverability changes. This is supported by routine monitoring, including monthly compliance performance reporting and formal review points through the appropriate governance route.

Triggers include:

- Serious incident, near miss, or enforcement action
- New safety risk or loss of an interim control
- Sustained rise in repeat problems, complaints or disrepair claims
- Material delivery failure including contractor underperformance or access failure
- Procurement delay or mobilisation slippage that changes delivery windows
- Material budget change or major cost movement adversely impacting delivery.
- Change in legal or regulatory requirements that changes scope
- Decision affecting a whole block or estate, or a large number of homes
- Any change that delays a published Year 1 commitment or changes scope materially

When a trigger occurs, the council will:

- Explain what changed and why
- Confirm what is being done in the meantime to manage risk
- Confirm the review date and where the decision sits
- Make the change visible through the next resident update and the annual refresh where the change is material

Brighton & Hove City Council

Cabinet

Agenda Item 188

Subject: Housing Safety and Quality: Our Improvement Journey – Progress Update.

Date of meeting: Thursday, 14 May 2026

Report of: Cabinet Member for Housing

Lead Officer: Name: Corporate Director Homes & Adult Social Care

Contact Officer: Name: Martin Reid

Email: Martin.Reid@brighton-hove.gov.uk

Ward(s) affected: (All Wards);

Key Decision: Yes

Reason(s) Key:

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 This report provides a six-month update on the Council's response to the Regulator of Social Housing's (RSH) C3 Regulatory Judgement (August 2024) relating to the, Safety and Quality Consumer Standard. It sets out the current position across key areas of compliance – fire, water, electrical, smoke detection, and repairs – and evidences the improvements delivered since the judgement, alongside the work already underway before it. The report also sets out ongoing areas of challenge, including, sustained demand pressures within repairs and maintenance, driven by proactive activity to support compliance with Awaab's Law, and the need to increase the number of council homes with a recent stock condition survey. The report seeks Cabinet endorsement for the Housing (Safety & Quality) Improvement Programme 2026/27 as the foundation for becoming a Great Landlord, delivering a safe, compliant and resident focused service, embedding improvement rather than short term recovery.
- 1.2 This report aligns with the Council Plan 2023–2027 priorities of Homes for Everyone and a Responsive Council with Well-Run Services, reaffirming the council's commitment that compliance is the floor, not the ceiling, and that every resident lives in a safe, high-quality home. The report reflects core Housing Strategy 2024-29 priorities to: improve housing quality, safety and sustainability; and, provide resident-focused housing services. Continued Cabinet oversight aligns to an external audit recommendation and remains central to maintaining transparency, accountability, and confidence in the council's continuing improvement journey.

2. Recommendations

- 2.1 Cabinet note and comment on progress made with compliance against the Regulator of Social Housing, Safety & Quality Consumer Standard since the last update in December 2025.
- 2.2 Cabinet endorse the Housing (Safety & Quality) Improvement Programme 2026/27 and our work toward becoming a Great Landlord outlined in the report and attached as Appendix 1.

3. Context and background information

Progress since the Regulatory Judgement

- 3.1 On 9 August 2024, following intensive engagement, the Regulator of Social Housing issued a C3 Regulatory Judgement for Brighton & Hove City Council, identifying failings against the Safety and Quality Consumer Standard, one of the four RSH Consumer Standards. A C3 Judgement means the Regulator found the council was failing to meet the required consumer standard for the safety and quality of homes and significant improvement was required. The Regulator highlighted weaknesses in the council's management of electrical, fire, water and smoke-detection safety, a significant repairs backlog. Since that time the council has remained in formal intensive engagement with the Regulator. The council has taken decisive action to address each area of concern. The Regulator has confirmed that the judgement can only be amended through a formal inspection visit that is likely to take place within the next eighteen months.
- 3.2 The report reflects and forms part of the council's formal intensive engagement with the RSH in relation to this standard and demonstrates that the overall direction of travel remains positive. Strengthened leadership, clearer accountability, and better data quality have provided a stronger foundation for sustained improvement. The council is now shifting from short-term recovery towards a more mature, systems-led approach where compliance activity is routine, data-driven, and verified through governance and resident assurance.
- 3.3 The report updates on the council's continued improvement journey and includes our Housing (Safety and Quality) Improvement Programme, informed by, and building on, the Root Cause Analysis previously shared with Cabinet that explored the underlying reasons for previous compliance failures and systemic challenges to be addressed.
- 3.4 The Housing (Safety and Quality) Improvement Programme informs our wider work toward being a Great Landlord, which also incorporates our planning around how the council will achieve and evidence compliance with all RSH Consumer Standards and fulfil our ambition on being more than compliant by being responsive to our residents' voices through our 'Creating Great Homes Together Programme'.
- 3.5 The council's wider improvement journey began prior to the regulatory judgement with early actions on governance and compliance. These actions have been accelerated and consolidated through our continued intensive

engagement with the RSH, supported by the Housing Safety & Quality Assurance Board, Great Landlord Board, Corporate Leadership Team (CLT) and Cabinet-led oversight. Cabinet have considered reports on 'Responding to the Regulator for Social Housing's Judgement' in September 2024, and a 'Housing Safety and Quality Compliance Update in May 2025'. December 2025 Cabinet considered a further update report, 'Regulator of Social Housing - response to Regulatory Judgement including Procurement of Stock Conditions Contractor'. Place Overview & Scrutiny Committee considered the Housing Regulator Judgement, Report to Cabinet in September 2024 and Housing Safety and Quality Compliance Updates in January and September 2025.

Table 1: progress since RSH judgement against areas identified as non-compliant.

Areas	RSH Judgement (August 2024)	Position then (October 2025)	Position now (March 2026)
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.	93 percent homes with a valid 5-year EICR. 77.3 percent communal areas with a valid communal EICR.	96.8 percent homes with a valid 5-year EICR. 85.7 percent communal areas compliant.
Smoke alarms	Cannot evidence compliance with legal requirements for smoke detectors.	99.4 percent of homes had a working alarm in 12,227 dwellings.	99.8 percent of homes have a working alarm in 12,253 dwellings.
Water safety (risk assessments and remedial actions)	More than 600 buildings require a risk assessment" and "more than 500 overdue water safety remedial actions."	90.4 percent of buildings with a valid risk assessment.	96.7 percent of buildings with a valid assessment. 1,061 overdue actions. This aligns to the significant increase in inspections.
Repairs backlog	A backlog of around 8,000 low-risk, low-priority repairs.	2,479 repairs older than 28 days.	4,802 repairs older than 28 days. Includes damp and condensation demand increase from 27 October.
Fire safety remediation	RSH raised concerns about	2,918 FRA actions.	1,466 live FRA actions.

Areas	RSH Judgement (August 2024)	Position then (October 2025)	Position now (March 2026)
	delays in completing over 1,700 fire safety actions identified across the stock.		2 high, 0 medium and 1,464 low risk. Target for BAU is by June 2026

- 3.6 Over the past year and a half, the council has moved from recovery to sustained improvement and has made significant progress on compliance. Priority has been given to closing critical safety actions, building workforce capacity, strengthening leadership and governance, improving data quality and rebuilding confidence in the safety of council homes.
- 3.7 Governance and assurance have been strengthened through director-led oversight and the Housing Safety and Quality Assurance Board, supported by specialist fire, building and water safety officers. Delivery and financial risks (including access, contractor capacity, inflationary pressures and temporary waking-watch costs) are managed through the Corporate Risk Register, reported to CLT and the Cabinet Member, and reviewed monthly.
- 3.8 A risk-based approach is being maintained to prioritise the highest hazards and prevent regression, supported by monthly performance monitoring, data assurance and early-warning triggers. Key mitigations include escalation under the no-access procedure, increased both in house and contractor capacity and routine checks on compliance activity. Residents are seeing clearer communication and faster responses to safety issues, and the council will continue to work with residents to improve access and build confidence that homes meet modern, compliant safety standards.

Progress against areas identified by the Regulator as non-compliant

Overall position, key strengths, risks and mitigations.

Strengths

- 3.9 The council has demonstrated positive, continuous and measurable improvement across the key compliance areas previously assessed as non-compliant, including smoke detection, water safety, fire risk assessment (FRA) remediation actions and electrical safety. Transparent data reporting, with regular reporting cycles and a clear governance framework, continues to strengthen assurance and accountability. The work has been underpinned by positive partnership working, including with East Sussex Fire & Rescue Service, Building Safety Regulator, UK Power Networks and Homes England. The council's risks are well understood with mitigations in place and clear, time-bound timelines for reaching full compliance.

Risks

- 3.10 Key risks relate to sustained demand pressures within repairs and maintenance, which continue to exceed current available capacity, driven in particular by proactive activity to support compliance with Awaab's Law.,

Damp and mould volumes are increasing faster than they can currently be resolved. Some areas of delivery remain subject to external dependencies including UK Power Networks with regard to work on rising and lateral electrical mains and Building Safety Regulator/East Sussex Fire & Rescue Service around classification of some high-rise residential buildings. In addition, commencement of the enhanced programme to increase the number of homes with a recent stock condition survey is imminent and achieving full stock condition coverage within two years carries delivery and outcome risks that require active management.

Mitigations

- 3.11 Mitigations underway include additional contractor and staff resourcing across fire safety, building safety, damp & mould remediation and water safety, alongside a shift towards planned preventative maintenance models to alleviate pressures on the Housing Repairs & Maintenance Service and respond to the outcomes of the planned stock condition surveys. The council is also continuing to review and strengthen data assurance and performance reporting, including through our intensive RSH engagement and council governance processes, such as our Health Safety and Quality Assurance Board tracker, to support oversight and early identification of emerging issues.

Key areas of compliance

Electrical safety

- 3.12 Electrical safety was identified as an area for improvement by the RSH due to the number of overdue inspections and incomplete records. As of March 2026, 96.8% of our homes are within a compliant 5-year domestic testing programme, compared to just over half of all homes at the time of the Judgement. All Category 1 (C1) and Category 2 (C2) hazards identified at inspection are addressed as part of our certification. The electrical testing programme remains on trajectory to achieve full compliance by December 2026. The focus for the coming year is to sustain throughput, complete communal inspections, which have been undertaken on a risk prioritisation basis and now cover 85.7% of all communal areas.
- 3.13 The council continues to progress work with UK Power Networks (UKPN) to carry out proactive testing of mains electrical installations in high-rise blocks where the council cannot isolate the supply. Contracts have been let and works are progressing to replace and upgrade the incoming, rising and lateral mains in the six blocks identified in the January 2026 Cabinet report, Wiltshire House, Hereford Court, Warwick Mount and the Allamanda, Viscaria and Cherry blocks on the Bristol Estate.

Smoke detection

- 3.14 The council had previously lacked consistent assurance that alarms were fitted and working in all homes. Positive progress continues to be made with validated compliance at 99.8% of homes having smoke detection, with 58 remaining properties, including empty homes, complex cases, and cases subject to no-access procedures. Future reporting will exclude empty homes to better reflect occupied stock compliance.

Water safety

- 3.15 Water risk assessment compliance continues to rise to cover 96.7% of buildings following contractor consolidation. However, water safety remains a fragile area of compliance. Overdue remedial recommendations are reducing.. A new Water Safety & Legionella Compliance Manager commences in post in April 2026. The council is also re-engaging the incumbent Water Safety Contractor via a short-term contract award to secure a stable, compliant contractor resource and service while developing a longer-term procurement strategy.
- 3.16 The council recognises that it is not yet where it should be on water safety, and this remains a top priority. The next stage is to embed improved oversight, mobilise the updated contract arrangements, including planned preventative maintenance programme, continue to improve contractor performance and data resilience.

Repairs and maintenance

- 3.17 Repairs and maintenance were highlighted by the Regulator in August 2024 because of a significant backlog of overdue routine repairs. In June 2024, the total number of open repairs over 28 days stood at 9,653, reflecting historic backlogs that built up during and after the pandemic. By October 2025, this had reduced to 2,479, representing a reduction of almost three-quarters. September 2025 recorded the highest inflow of new repairs since Council records began, driven by proactive damp-and-mould outreach ahead of the implementation of Awaab's Law.
- 3.18 Repairs demand continues to rise, with over 1,000 more repairs reported than in March 2025, and the number of repairs open for more than 28 days has increased due to sustained high volumes. In particular, caseload continues to grow due to proactive council outreach to ensure compliance with Awaab's Law, including: Increased tenant self-reporting; greater hazard-identification by damp & mould technicians; wider staff reporting from home visits.
- 3.19 The service continues to prioritise completion of the oldest cases, with reduction in repairs open for over a year. To mitigate these pressures, the council is also planning to procure additional contractor resources, reviewing in-house operational capacity and working to improve alignment with planned works programmes.
- 3.20 The service continues to monitor completion rates and resident satisfaction to ensure sustained improvement.

Fire safety

- 3.21 Fire safety was one of the Regulator's key areas for improvement, with assessments and remedial actions not previously completed in a timely way. In 2024 the total number of live fire-risk-assessment (FRA) remediation actions across the housing stock peaked at 8,228 following completion of updated fire risk assessments across all our blocks. As reported to December 2025 Cabinet, as of October 2025, this number had reduced to

2,918, a reduction of more than 60 per cent. Within this total, the number of high-risk actions fell from 417 in August 2025 to 14 in October 2025, and medium risk actions fell from 456 to 32 in the same time period. At that time 2,872 low-risk actions remained.

- 3.22 As of March 2026, there are 1,466 FRA remediation actions. The February 2025 figure was 7,287. The number of open high risk actions falling to 2 and open medium risk actions falling to 0. 1,464 low risk actions remain open. Each action is tracked to completion managed through the council's dedicated fire-safety programme, prioritised by building risk and monitored through the fire-safety tracker.
- 3.23 The council have successfully applied to the Government Waking Watch Replacement Fund and Homes England Cladding Safety Scheme (CSS) which will mitigate the costs of fire safety measures to the Housing Revenue Account and leaseholders. The council does not have any Grenfell Tower type cladding on any of our blocks. We have bid to the CSS to fund remediation works where we have some high-rise blocks with elements of façade or curtain wall material that may be deemed to pose a high risk of fire spread. Where we have such situations, the Council has also put additional fire mitigation measures in place as required, such as a waking watch or upgraded fire alarm system.
- 3.24 Completion of Personal Emergency Evacuation Plans is progressing supported by additional resourcing.

Other areas of safety and quality compliance

- 3.25 As part of our commitment to being a Great Landlord for our tenants and leaseholders we not just focused on the specific areas of compliance cited in the Regulatory Judgement. Although not raised in the Regulator's judgement, the council continues to monitor and improve performance across all other statutory key Safety & Quality compliance areas.
- Gas and fuel safety: All domestic and communal gas certificates are in date. 100%.
 - Carbon monoxide detection: 99.9% of dwellings have carbon monoxide detection / alarms.
 - Asbestos management: Rolling re-inspection programme covering common ways is continually in progress to ensure full compliance is maintained.
 - Lift and lifting equipment safety: Servicing compliance under the Lifting Operations and Lifting Equipment Regulations is in progress to ensure full compliance is maintained.

Housing (Safety and Quality) Improvement Programme 2026/27

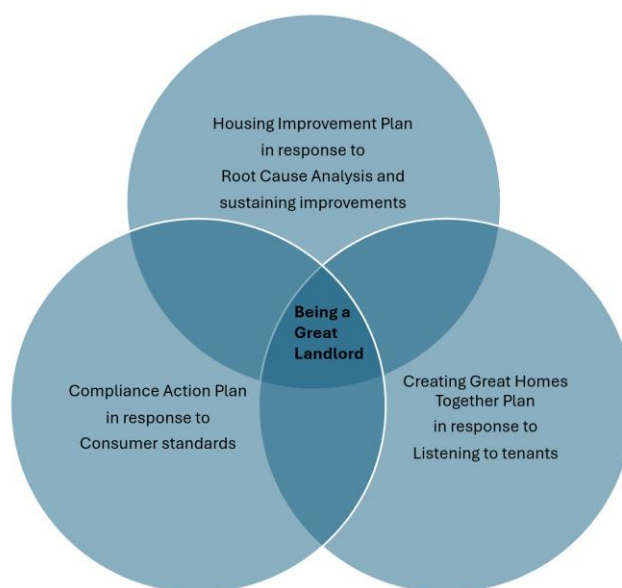
- 3.26 The Housing (Safety and Quality) Improvement Programme has been developed in response to the Root Cause Analysis and sets out the council's approach to resetting Housing Services as a safe, compliant and resident-focused landlord following the Regulator of Social Housing C3 judgement. The Programme is focused on delivering sustained, embedded improvement, rather than short-term recovery, by addressing the underlying

causes of non-compliance with the Safety and Quality Consumer Standard and putting in place clear controls, ownership and evidence to prevent repeat failure.

- 3.27 Completion by March 2027 will enable the council and residents to have confidence that homes are demonstrably safe, statutory checks happen on time and follow-on actions are closed promptly. Residents should receive clear, consistent communication with fewer handoffs and repeat issues. Decisions are evidence-led, with risks surfaced early and performance reporting reflecting lived resident experience. Residents should experience a stronger voice shaping priorities and investment, faster follow-up with fewer long-running repairs and clearer updates on changes, alongside a visible “you said, we did” learning culture across the service.
- 3.28 The Improvement Programme is structured around six themes aligned to the Root Cause Analysis: resident voice; workforce capacity and capability; data quality and use; clear responsibility for compliance; prioritisation and focus; and leadership and culture. Together, these themes underpin a shift in the housing operating model to strengthen day-to-day grip on risk and compliance through clearer ownership and escalation routes, a routine of data validation, sampling and quality checks to test that reported performance reflects reality, and a learning-organisation approach that connects complaints, Ombudsman findings, resident insight and service performance.

Being a Great Landlord

- 3.29 The Housing (Safety and Quality) Improvement Programme is part of a system of programmes with the intention of supporting the council’s ambition to become a Great Landlord. The other two programmes – Consumer Standards Programme and Creating Great Homes Together Programme – are set out below.



Consumer Standards Programme

- 3.30 Our Consumer Standards Programme reflects the latest position across all services, including new actions and resets around how we will achieve and evidence full compliance with all of the Regulator of Social Housing's Consumer Standards. There is a regular senior management review of progress, ensuring sustained oversight and prompt resolution of risks or delays. Key exceptions—whether emerging risks, stalled actions, or areas requiring strategic decisions—are escalated to the Great Landlord Board for visibility, challenge, and support.
- 3.31 Overall progress remains positive, with strong momentum and the majority of actions in delivery—particularly those linked to longer-term programmes such as tenant engagement, complaints learning, stock condition surveys, asset management planning and compliance frameworks. A smaller number of actions are not currently resourced or are temporarily paused, largely due to capacity pressures (for example, equality impact assessments, policy follow-on activity and information reviews), while a significant number are now complete, including work on governance, policy updates, safety procedures and preparations for Awaab's Law.

There are four consumer standards: 1. Safety & Quality, 2. Transparency, Influence & Accountability, 3. Tenancy and 4. Neighbourhood & Community. Overall progress remains positive, with strong momentum and the majority of actions in delivery, such as tenant engagement (listening and responding to tenant voices), learning from complaints (for continuous improvement), stock condition surveys (to be an intelligent client in terms of asset management and planning), and compliance (with regulatory frameworks for RSH, Building Safety regulator, East Sussex Fire and Rescue Service, etc). Capacity/resourcing continues to be a challenge so taking a risk-based approach and prioritisation are key for successful delivery together with bringing in expertise from strategic partners.

Creating Great Homes Together

- 3.32 The Creating Great Homes Together programme is underpinned by a co-produced Improvement Plan: In April 2025, we held a series of tenant workshops across the city to explore key improvement themes emerging from complaints, Ombudsman findings, tenant perception surveys, member enquiries, and informal engagement. Workshops focused on: repairs; customer service; health & safety; ASB; and complaints handling. Frontline staff worked directly with tenants to co-design solutions and better understand priorities. We used the workshop insights to shape ongoing work and to design the Creating Great Homes Together improvement plan. We have already:
- Delivered complaints handling training for housing staff.
 - Improved our procedures and tenant guidance in key areas for improvement.
 - Restarted estate inspections.

- Strengthened our repairs material supply chain, reducing repeat visits.
 - Consulted tenants on repairs and tenant handbooks (now under review).
 - Procured digital tools to enhance damp & mould responses.
 - Between November–December 25, tenants helped prioritise the improvement plan to be delivered in two phases (2026–2028).
- 3.33 Our priorities focus on improving the day-to-day tenant experience across repairs, customer service and complaints. In repairs and maintenance, we will strengthen quality, transparency and confidence including by improving digital repair tracking, increasing “Right First Time” outcomes, providing clearer information about planned and major works, collecting more meaningful satisfaction feedback, and reducing handoffs through better diagnosis. Alongside this, we will modernise how tenants get in touch and improve service culture by building stronger ownership and empathy, reducing unnecessary handovers, embedding trauma-informed and neuro-inclusive communication, and applying an “Every Contact Counts” approach across all channels.
- 3.34 We will also work to build safer, more supportive communities and strengthen tenant voice. A major safer communities improvement project (with a focus on ASB and adoption of the Housing Hate Incident Policy) will improve awareness of reporting routes and escalation, ensure consistent advice and staff training, and introduce Community Commitments that support positive behaviour. In complaints, we will make the process more open and accessible through earlier and more transparent communication, personal contact at the start of a complaint, regular staff training, better tracking with senior involvement, improved mediation options, and simpler online reporting. Finally, our tenant engagement work will create new informal ways to get involved, broaden and diversify participation, provide training so tenants can take part with confidence, explore scrutiny groups, and refresh the overall tenant engagement strategy.

4. Analysis and consideration of alternative options

- 4.1 The Social Housing Regulation Act came into effect from 1 April 2024 and requires social landlords to comply with the standards set by the Regulator of Social Housing. Following the regulatory judgement the RSH expects the council as landlord to develop a plan that will drive significant change and to share that with tenants.
- 4.2 The issues identified in the report are also relevant to the council’s ability to meet multiple legal obligations and regulatory standards. As well as the RSH, compliance falls under the scrutiny of the Building Safety Regulator, the HSE and the fire service.
- 4.3 All of the above regulators have very substantial powers of enforcement available should the council not meet legislative and regulatory requirements obligations, leaving no alternative options but to ensure compliance.

5. Community engagement and consultation

- 5.1 The council continues to engage residents on progress since the Regulator of Social Housing's C3 judgement. Quarterly Area Panels receive updates on safety and quality, performance, and planned next steps, with questions captured and fed back into service delivery. These sessions provide a standing forum for scrutiny and for tracking progress against the themes highlighted by the Regulator.
- 5.2 Dedicated engagement continues at high-rise and Large Panel System blocks, including the Bristol Estate. Residents are informed through letters, notices, drop-ins and on-site tenancy visits. These activities support access for inspections and works, explain changes to evacuation strategies where relevant, and provide a route for individual concerns to be resolved quickly.
- 5.3 The council uses the tenant newsletter Homing In to provide regular citywide updates on safety, compliance and planned programmes. This includes plain-English explanations of what residents can expect before, during and after inspections or works, and signposts to further support.
- 5.4 Engagement feedback from Area Panels, building-specific activity at LPS and Bristol Estate, and Homing In will continue to be collated and reported through housing governance so that resident insight informs decisions and supports the council's vision of becoming a Great Landlord.
- 5.5 The Creating Great Homes Together consultation has involved residents and staff in considering key themes identified through analysis of existing housing customer insight data and in co-designing service improvements. The council will use the findings to inform priorities in the Housing Improvement Plan and to shape how services communicate and deliver at block and neighbourhood level. Engagement with residents is ongoing. Workshops are planned to inform work across housing compliance areas.

6. Financial implications

- 6.1 There are no direct financial implications as a result of the recommendations made in this report. The 2026/27 HRA budget set out the revenue and capital investment relating to health and safety works.
- 6.2 Officers will continue to closely monitor the costs associated with the works required, reporting any variances via the councils TBM process and to help inform future budget reports.

Name of finance officer consulted: Mike Bentley
22/04/26:

Date consulted

7. Legal implications

- 7.1 This report provides an overview of Brighton & Hove City Council's progress in addressing housing safety and quality compliance.
- 7.2 The Social Housing Regulation Act came into effect from 1 April 2024 and requires social landlords to comply with the standards set by the Regulator of Social Housing (RSH). On 9 August 2024 the Regulator of Social Housing

issued a C3 regulatory judgment that there are serious failings in the Council as landlord delivering the outcomes of the consumer standards and significant improvement is needed specifically in relation to outcomes for the national Safety and Quality Standard.

- 7.3 The Regulator expects the Council as landlord to continue to drive significant change. The Regulator has very substantial powers of enforcement available but is not proposing to use enforcement powers at this stage, provided Brighton and Hove CC continues to seek to resolve these issues. The RSH also has powers to conduct full planned inspections of social housing providers at least every four years to assess their delivery of services against four Consumer Standards, those standards being Safety and Quality; Neighbourhood and Community; Tenancy; and Transparency, Influence and Accountability.
- 7.4 The issues identified in the report are relevant to the Council's ability to meet multiple legal obligations and regulatory standards. As well as the RSH, compliance falls under the scrutiny of the Building Safety Regulator, the Health and Safety Executive (HSE) and East Sussex Fire & Rescue Service. The Council must comply with the enforcement notices issued by the fire service.
- 7.5 Proper management of water systems is crucial to prevent the growth and spread of Legionella bacteria. Under the Health and Safety at Work Act the Council has a legal responsibility to ensure tenants are not exposed to health and safety risks, and must follow the HSE Approved Code of Practice (HSE ACoP L8) and accompanying technical guidance.
- 7.6 There is the potential for the council to be exposed to compensation claims arising from disrepairs which have not been addressed on a reasonable timescale. Awaab's Law came into force for the social rented sector from 27 October 2025 whereby social landlords must address emergency hazards and damp and mould hazards that present a significant risk of harm to tenants to fixed timeframes.

Name of lawyer consulted: Natasha Watson Date consulted Date: 5 May 2026

8. Risk implications

- 8.1 Delivery risks include organisational resilience, further unforeseen events that divert capacity, capacity constraints, and shifting expectations. The Housing Revenue Account (HRA) budget, Medium Term Financial Strategy (MTFS), indicates a growing underlying deficit in the HRA and identifies mitigations that can be actioned to address this. These risks will be managed proactively and transparently. Mitigations include taking a one council approach, continued alignment of the HRA budget to compliance duties based on risk-based prioritisation tools, and empowering all tiers of staff to collaborate and maintain focus on compliance as a priority for maintaining safe and high quality stock.

9. Equalities implications

- 9.1 Improving housing safety and quality has clear equality benefits. The council's compliance programmes address risks that disproportionately affect some residents, including older and disabled people, families with young children, and those living with long-term health conditions. Reducing hazards such as fire, damp and mould, cold and electrical risk supports better health and wellbeing and helps to narrow inequalities in housing outcomes.

10. Sustainability implications

- 10.1 The housing safety and quality programmes described in this report contribute positively to the council's wider sustainability objectives by improving the condition, efficiency and lifespan of homes. Our programme of stock-condition surveys will provide detailed information on the state of the housing stock, which will support future planning for energy efficiency, decarbonisation and resource use.

11. Health and Wellbeing Implications:

- 11.1 The council's compliance and safety programmes have a direct positive impact on residents' health and wellbeing. Safer, warmer and well-maintained homes reduce the risks of fire, damp and mould, electrical hazards and cold-related illness. They also contribute to improved mental wellbeing by providing greater security and reassurance for residents

Other Implications

12. Procurement implications

- 12.1 In order to be a Great Landlord, we recognise that over and above our in-house workforce for compliance and maintenance, we require contractors to provide additional capacity and as appropriated expertise to support the safety and quality of our housing stock. This means that sufficient procurement capacity is being secured to support appointing the relevant capacity and capability.

13. Crime & disorder implications:

- 13.1 There are no crime & disorder implications arising directly from this report.

14. Conclusion

- 14.1 The council remains in formal engagement with the Regulator of Social Housing following the C3 Regulatory Judgement issued in August 2024. The direction of travel continues to be positive, with measurable progress across all areas of safety and quality and strengthened governance now in place. Progress toward compliance, including integrating compliance data, will continue to receive focused attention through senior leadership oversight.

- 14.2 The next phase is to embed improvement as business as usual. This will be driven through the Housing Improvement Programme and the outcomes of the Creating Great Homes Together consultation, creating one framework for delivery, accountability and resident engagement.
- 14.3 The actions and progress outlined in this report seek to strengthen compliance with the Consumer Standards, provide a sound foundation for long-term stewardship of the housing stock and demonstrate the council's continuing commitment to its Great Landlord vision: to ensure every resident lives in a safe, well-maintained and high-quality home.

Supporting Documentation

1. Appendices

1. Appendix 1; Housing Improvement Programme 2026/27.
2. Appendix 2, Housing Safety and Compliance Performance Indicators.

Housing Improvement Programme 2026 to 2027

Brighton and Hove City Council

Homes & Investment and Housing People Services

Summary

This plan sets out how the council will become a great landlord that residents can have confidence in. It brings together the impact we want to have on resident experience, what the Regulator expects through the consumer standards, and what the Housing service must do to deliver safe, good quality homes and a resident focused, data led, reliable service.

The plan is focused on addressing systematic issues that led to the Regulatory Judgement, continuing to address root causes and reduce the risks of similar issues recurring. The Plan seeks to ensure that the council remains compliant with relevant regulatory and legislative requirements as the foundation for working toward being a Great Landlord, focused on outcome, service quality and the experience of tenants and residents. It sets clear commitments, the controls that embed them, and the evidence that will show sustained progress. It is designed to support strong transparent governance and systematic improvements in day-to-day delivery.

Our vision is to be recognised as a Great Landlord – doing the right things because we are driven by what our residents tell us and not just what regulations require of us.

What residents will notice by March 2027

- ✓ A stronger resident voice, in how we deliver and review our services, decide on budget and other priorities and proactively invest in our homes and communities.
- ✓ Residents feel safer and more confident in their homes and blocks because checks happen on time and follow up happens quickly.
- ✓ Residents get clear, consistent updates, including when access is needed and when plans change.
- ✓ Residents are passed between teams less often because ownership is clear and handovers work.
- ✓ Repairs and safety actions are completed properly first time more often, with fewer repeat visits and fewer long running outstanding actions.
- ✓ The council addresses the most serious issues first, is transparent and engages on priorities in an accessible way and how these priorities may change.
- ✓ Residents can see a learning organisation in operation, a service focused on building and sustaining improvements in the quality of tenant experience and outcomes, including how feedback, complaints, and Ombudsman decisions have led to specific changes, through a clear “you said, we did” audit trail.
- ✓ Residents get a better, more consistent, accessible service and feel treated fairly, regardless of who they speak to, because the council uses the same standards and quality checks across Housing Services.

PART A: CONTEXT AND PURPOSE

Regulatory context and why this plan exists

From 1 April 2024, social landlords have to meet the Regulator of Social Housing consumer standards under a strengthened regime, with more proactive regulation and inspections.

Brighton and Hove City Council must be able to demonstrate, with evidence, that it is consistently meeting those standards and sustaining improvement. This plan exists to provide one clear, auditable line of sight from the issues that need fixing, to the controls and governance that prevent repeat failure, to what residents should notice.

The consumer standards

The consumer standards set the outcomes residents should experience from their landlord services.

Safety and Quality: Homes are safe and well maintained. Legal duties are met. Checks happen on time and actions from safety assessments are completed and verified.

Transparency, Influence and Accountability: Residents are treated with fairness and respect. Services are accessible. Residents can influence decisions. Complaints are handled properly and learning is used to improve.

Neighbourhood and Community: Landlords take reasonable steps to keep shared spaces safe and work with relevant partners to support wellbeing in the areas where they provide homes.

Tenancy: Tenancies and allocations are managed fairly and transparently and landlords support tenancy sustainment where relevant.

These standards matter because they set the minimum compliant service residents can expect, including safe homes, timely follow up, clear communication, and a fair complaints process.

The council's C3 judgement and formal engagement

On 9 August 2024, following responsive engagement, the Regulator published a regulatory judgement for Brighton and Hove City Council, identifying failings against the Safety and Quality Standard and issuing a consumer grading of C3. The judgement states:

'that there are serious failings in delivering the outcomes of the consumer standards and that improvement is needed, specifically in relation to the Safety and Quality Standard'.

The Regulator highlighted weaknesses in the council's management of electrical, fire, water and smoke-detection safety, a significant repairs backlog.

Since that time the council has remained in formal intensive engagement with the Regulator.

The Regulator expects an improvement plan that drives significant change, addresses root causes of non-compliance and reduces the risks of similar issues recurring, and that it is shared with tenants.

What the Regulator expects to see from the council now

The Regulator will be looking for evidence that improvement is systematic, sustained, and embedded in business as usual, not a short-term recovery. In practice, the council needs to be able to show the following, consistently and with a clear audit trail that demonstrates the impact upon outcomes for residents, including, compliance, service quality and tenant experience.

A plan that reflects and builds upon the learning from our root cause analysis to understand why the council did not fully comply with the RSH Safety and Quality Standard and how to ensure failings are not repeated.

A plan that drives significant change: Clear priorities and realistic commitments, with clear ownership and clear evidence, so progress can be tested rather than described.

Effective control of Safety and Quality: Checks completed on time, actions raised and closed properly, quality verified through proportionate checking and rechecking, and exceptions handled quickly so risk does not drift.

Confident and consistent information about homes and services: Confidence that records and key datasets can be relied on, so decisions are made using evidence rather than workarounds and missing information.

Resident accountability and learning: Clear evidence that resident feedback, complaints, and Ombudsman learning are shaping decisions and preventing repeat failure, alongside transparent reporting and a clear approach to tenant accountability.

Sustained improvement through governance and leadership grip: A consistent set of routines that record decisions, track follow through, escalate early when something slips, and test reality through sampling, so performance reporting matches what residents experience.

How we got here

The Regulator's judgement and the council's Root Cause Analysis, reported to Cabinet in June 2025, [Housing Safety and Quality Compliance Update.pdf](#) and Place Overview & Scrutiny Committee in September 2025, [Housing Safety and Quality](#)

[Compliance Update.pdf](#) were clear that the issues were not only about individual services.

The analysis reveals that the issues stem not only from operational failures but also from deeper systemic and cultural challenges. While corrective actions have begun, the findings clarify the structural, cultural, and delivery changes needed to achieve lasting compliance and improve outcomes for residents.

This includes how the council listens, learns sets priorities, leads, builds capability, uses data, and assures compliance.

This work supports the Council Plan priorities of 'Homes for Everyone' and 'A Responsive Council with Well-Run Services', and the Housing Strategy priority of 'Improving Housing Quality'

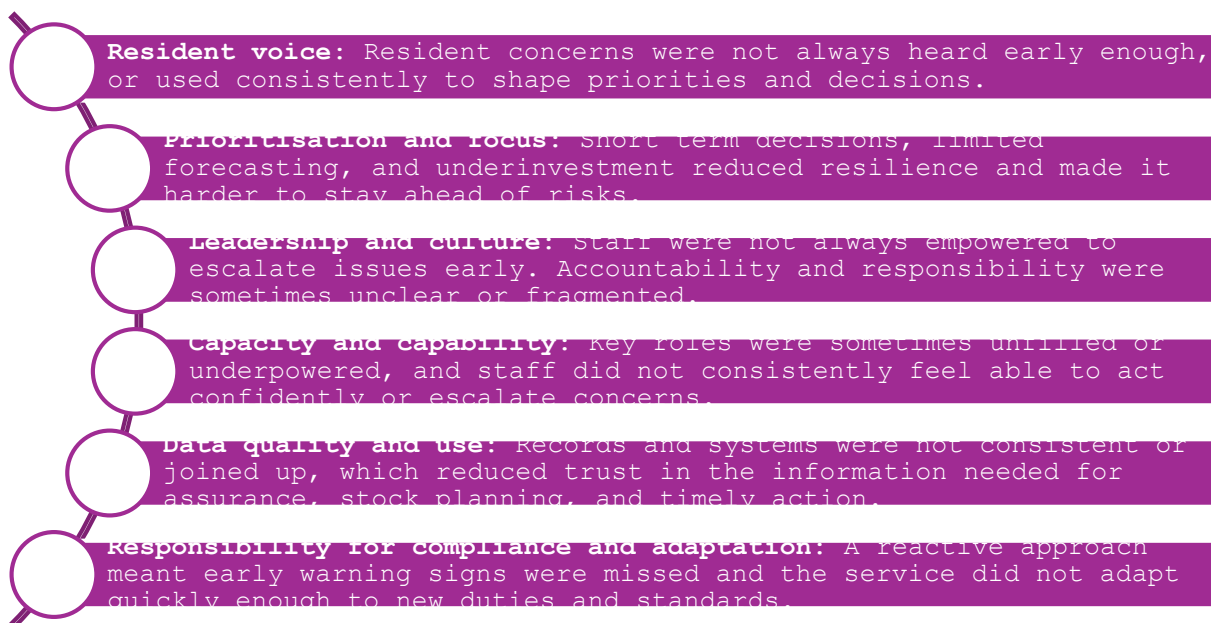
Since August 2024, the council has stabilised and improved delivery and compliance and started to change how it runs. Progress is not only work completed. It is the shift to a controlled improvement system that prevents repeat failure and can be evidenced through routine assurance evidence, exceptions reporting, sampling, and re checks.

Root causes and what has changed in the operating model

These six themes from our root cause analysis have been reframed as priorities for organisational change. We are adopting a strengths-based approach that focuses on learning from and addressing areas for development, as well as systems that support us to be a Great Landlord.

Strengthening each of these areas and improving their alignment is essential for sustainable improvement. The council remains committed to continuous learning and collaborative action, using this analysis as a foundation for building a robust improvement plan with internal teams, residents, and elected members.

Transparency, accountability, and measurable progress are central to this approach. Monthly highlight reports and the development of the core NEC Housing system as a single source of housing compliance data ensure clear oversight. Updates to the Housing Safety & Quality Assurance Board, Great Landlord Board, Corporate Leadership Team (CLT), Cabinet members, Cabinet and Overview & Scrutiny Committee reflect our commitment to ensure that the safety and quality of our council homes remain our priority.



The operating model is now changing in practical ways.

- ✓ Leadership is stronger. Issues are escalated earlier when something is off track. Decisions are recorded and followed through.
- ✓ Ownership is clear, with named leads for key risks and priorities and clear escalation routes into decision points.
- ✓ Information management is improving. NEC Housing is used more consistently to inform decision making, supported by routine checks, so leaders rely on evidence rather than informal updates.
- ✓ The Learning Organisation framework is being embedded. Resident insight, complaints and Ombudsman learning, performance monitoring, compliance assurance, and quality checks are reviewed together and inform decisions and tracked actions.
- ✓ Target Operating Model work for Homes & Investment is setting clear roles, processes, and controls so improvement is sustained across teams.
- ✓ Quality checks and sampling are used to improve systems and consistency, reduce rework, and target supervision and training. Focus is on learning and support, not blame.
- ✓ Continued investment in workforce capacity and capability, including in a new Damp & Mould team supporting our proactive approach to implementing Awaab's Law, significant development of our apprenticeship programmes aligned to identified skills gaps, additional building safety and fire safety roles and increased Head of Service capacity
- ✓ Improving resident engagement continues to be a priority area of focus, with resident workshops held at our annual tenant conference, contacting all residents as part of our proactive response to implementing Awaab's Law, increasing resident engagement in repairs and asset management.

What has already improved

The council has made significant progress across all areas where the RSH identified non-compliance and has remained compliant in other areas of health & safety not subject to the Regulatory Judgement. The judgement focused mainly on how well the council was delivering against outcomes of the Safety and Quality Standard , but the learning is wider than safety alone and is being applied across Housing Services.

Electrical safety and smoke alarms: Most homes now have up to date electrical safety checks and working smoke alarms. The remaining gap is mainly access and follow up, with a focus on completing final access cases to reach full coverage.

Repairs backlog and service grip: Very overdue repairs have reduced. The service is more in control of what is outstanding, with clearer prioritisation and stronger follow up. Residents are starting to experience fewer very long waits and fewer repeat jobs.

Fire safety action and risk-based delivery: The highest priority actions are nearing completion and the medium priority remediation actions are reducing . Fire risk assessments are improving in quality so actions better match risk and priority. Residents are starting to experience clearer communication in blocks, supported by improved quality checks.

Water safety recovery: Coverage is improving and delivery capacity is stronger. This remains an area for improvement and retains senior management oversight.

Knowing our homes and planning investment: The December 2025 Cabinet approval to award a two-year Stock Condition Survey Contract will enable full survey coverage of all council homes, leading to an improved understanding of the condition of the council's housing stock, and provide the robust evidence base required for long-term investment planning and regulatory assurance. This decision was a direct response to the council's Root Cause Analysis arising from the Regulator of Social Housing regulatory judgement which identified Data Quality & Use, and Prioritisation & Focus as core drivers of improvement.

Areas	RSH Judgement (August 2024)	Position then (June 2024)	Position now (January 2026)
Electrical safety (domestic Electrical Installation Condition Report, EICR, and communal EICRs)	Around 3,600 homes without a current EICR and no evidence of a current certificate for over 600 communal areas.	53 percent homes with a valid 5-year EICR. 20.8 percent communal areas with a valid communal EICR.	95.2 percent homes with a valid 5-year EICR. 81.6 percent communal areas compliant.
Smoke alarms	Cannot evidence compliance with legal	81.5 percent of homes had a working alarm.	99.6 percent of homes have a working alarm.

Areas	RSH Judgement (August 2024)	Position then (June 2024)	Position now (January 2026)
	requirements for smoke detectors.		
Water safety (risk assessments and remedial actions)	More than 600 buildings require a risk assessment” and “more than 500 overdue water safety remedial actions.”	52.1 percent of buildings with a valid risk assessment. (Nov 2024, no June actions count published).	95.1 percent of buildings with a valid assessment. 2,281 overdue actions (Dec 2025). This aligns to the significant increase in inspections.
Repairs backlog	A backlog of around 8,000 low-risk, low-priority repairs.	9,653 repairs older than 28 days.	3,697 repairs older than 28 days. Focus on oldest work orders and average time continues to reduce.
Fire safety remediation	RSH raised concerns about delays in completing over 1,700 fire safety actions identified across the stock.	4,253 FRA actions. Peaked at 8,268 in December 2024 with completion of updated FRAs on all blocks.	2,294 live FRA actions.

PART B: DEFINITION OF SUCCESS

What success looks like by March 2027

Progress is reviewed quarterly. Priorities only change when evidence shows a change is needed, and the decision is recorded and explained.

Homes are safe and well maintained. The service is accessible. Problems are fixed properly and do not keep coming back. When plans change, residents get clear explanations and realistic timescales.

Success means residents can see, and the council can show, that commitments are being delivered and problems are being addressed in a systematic way.

Resident outcomes

- ✓ Residents feel safe and confident in their home and block because safety checks happen on time and follow up happens quickly.
- ✓ Residents get clear, consistent updates they can rely on, including when access is needed and when plans change.
- ✓ Residents are passed between teams less often because ownership is clear and handovers work.
- ✓ Repairs and safety actions are completed properly first time more often, with fewer repeat visits and fewer long running outstanding actions.
- ✓ The council deals with the most serious issues first and is transparent and engages on priorities and how priorities may change in an accessible way.
- ✓ Residents can see a learning organisation in operation, a service focused on building and sustaining improvements in the quality of tenant experience and outcomes, including how feedback, complaints and Ombudsman outcomes have led to specific changes through a clear “you said, we did” audit trail.
- ✓ Residents receive a better more consistent, accessible service and feel treated fairly and with respect, regardless of who they speak to, because the council uses the same standards and quality checks across Housing Services.
- ✓ Works to residents’ homes and blocks feel more planned and less reactive over time because investment and repairs decisions are based on stronger knowledge of homes and risk.

The council assurance view

The council can show it is compliant, proactive and in control across Housing Services. This means decisions are recorded, exceptions are visible, actions are closed, and checks confirm the issue is fixed.

Evidence is held through decision records, action and exceptions, compliance assurance evidence, contract performance, and sampling.

Theme 1 - Resident voice

Theme of non-compliance: At the foundation of the six interdependent themes identified by our root cause analysis lies resident voice, where a hierarchical culture focused on national policy initiatives and organisational priorities was not always responsive to resident concerns.

What is changing:

- Expansion of the Community Engagement Team including a digital communications officer;
- Diversification of the resident voice, over 400 residents have expressed an interest in engagement opportunities.
- Co-production of the service improvement programme rather than residents being engaged separate to staff.

What does it look like to be a Great Landlord:

- Diversity and depth of resident involvement.
- Resident insight shaping decisions.
- Increased trust in engagement and follow through.

Outcome on service quality and tenant experience:

Residents can see that their experience shapes what we do and how we do it. We don't make fewer decisions about residents without residents. Standards and updates are clearer. When residents tell us something is not working, we act and we explain what changed.

This theme exists because resident experience has not always shaped priorities and decisions. When insight is collected but not used in day to day decisions, we miss early warning signs, repeat the same mistakes, and lose trust.

In 2026 to 2027 we make resident influence routine and visible. Creating Great Homes Together is the main route for resident led improvement. We treat resident experience as essential evidence, alongside performance, compliance assurance, and quality checks. We show the link from what residents told us, to the decision we made, to what changed, and what residents can now expect.

Residents will be engaged on thematic resident oversight groups, including on Fire & Building Safety. We will also increase the transparency of information sharing with residents.

Commitment	What residents notice	Why it matters	How we stop repeat failure	How we prove it	Leadership and delivery	Milestones/ Deliverables
We publish a “you said, we did” update regularly, linked to real service changes and clear explanations.	Residents can see what changed, including when we cannot do something and why.	Feedback without visible change feels pointless and drives complaints.	Updates state what residents will notice and where to go for help.	Published updates plus an internal link to decision records and closure evidence.	Sponsor: Director Housing People Lead: Housing Strategic Communications Manager.	Start reporting you said we did at Area Panel meetings. Area Panel review starts in April 2026
We keep an up-to-date view of resident experience as part of the intelligence loop through the Great Landlord Board, that reviews themes from complaints and Ombudsman learning, surveys and member enquiries themes.	Clearer, more consistent messages, and visible action on what residents raise.	If insight is not reviewed in one place, it gets lost, early warning signs are missed, and problems repeat.	The summary is a standing agenda item. It is reviewed routinely. Actions and decisions are recorded with owners and tracked to closure.	Agenda items include the summary each cycle. Decision records show what changed because of it, with a small set of examples linked to closure evidence.	Sponsor: Corporate Director. Homes & Adult Social Care. Lead: Director of Housing People Services.,	We will continue to track and monitor participation and diversity of resident engagement. Action Plan on Resident Engagement is reported to at Great Landlord Board, Directorate Leadership Team and Cabinet Member Briefing.

Commitment	What residents notice	Why it matters	How we stop repeat failure	How we prove it	Leadership and delivery	Milestones/ Deliverables
						Directorate Leadership Team & Corporate Leadership Team monitor and act upon themes and learning from complaints, member enquiries and Ombudsman Decisions.

How we will evidence that this has been achieved.

- Annual Survey of Tenants & Residents (STAR) and Tenant Satisfaction Measures. [Housing performance – how are we doing?](#)
- Resident satisfaction measures in performance reporting (shared quarterly with Housing Area Panels: [Performance reports - council housing](#)
- Annual Housing Complaints Report & Self-Assessment: [Annual Housing Complaints Report and Self assessment.pdf](#)
- Council Plan progress updates to Cabinet which include Housing KPIs [202526 Mid-year Council Plan progress update.pdf](#)
- Annual monitoring report aligned to the Housing Strategy: [Housing Strategy 2024-29 Annual Monitoring Report 202425.pdf](#)
- Promotion and review of resident engagement measures and participation: [Resident groups, community engagement and neighbourhood funding](#)
- Housing Revenue Account Budget and Medium-Term Financial Strategy (for investment in Community Engagement Team and neighbourhood funding: [Budget Capital Investment HRA Programme 2026-27 and MediumTerm Financial Strategy.pdf](#)

Theme 2 - Prioritisation and focus

Theme of non-compliance: Prioritisation & Focus ensures that resources are aligned with long-term asset condition and compliance resilience; however, short-term decisions, limited forecasting, and underinvestment undermined the council's ability to strengthen these areas.

What is changing: With finite resources, we will take a risk-based approach to ensure that effort and investment are aligned to fulfil all of our compliance duties, Improvement Plan and resident impact.:

- We continue to make consistent positive progress toward compliance, including significant reductions in the backlog of routine repairs.
- Promotion of psychological safety.
- Clear distribution of leadership and decision-making responsibilities through a scheme of management.
- Embed a more connected council with leadership that brings critical resources together to deliver Council Plan outcomes.
- Use of data to measure individual and team performance.

What it looks like to be a Great Landlord:

- Stronger frontline involvement in planning.
- Data and evidence-based prioritisation and planning.

Outcome on service quality and tenant experience:

This will be clear about and keep our commitments to residents and explain clearly when priorities change. We focus on the work that reduces risk, improves everyday service, and prevents repeat problems.

In 2026 to 2027 we make prioritisation practical. We prioritise and are realistic about our commitments and focus of service and investment. We use the consistent data and resident voice to inform evidence and decide our priorities first. We are transparent in sharing information and decision making.

Through our Creating Great Homes Together Action Plan 2026 we aim to improving service quality, transparency, and tenant experience across Repairs & Maintenance, Safer Areas, Customer Service, Complaints, and Tenant Engagement.

Commitment	What residents notice	Why it matters	How we stop repeat failure	How we prove it	Leadership and delivery	Milestones/ Deliverables
<p>We use stock condition survey data and up to date asset insight to set priorities that inform planned preventative maintenance programmes and reduce responsive repairs.</p>	<p>Fewer responsive and repeat repairs and more remedies that deal with the cause, not only the symptom.</p>	<p>Without stock condition survey insight we maintain a high volume of responsive repairs and don't make best use of capital investment to proactively improve the quality of residents homes.</p>	<p>Use emerging stock condition survey information and repairs intelligence to target investment in planned preventative maintenance to reduce responsive repairs and proactively improve the quality of residents homes and satisfaction with the council as a landlord.</p>	<p>Stock condition survey and repairs intelligence is used in prioritisation of investment decisions. Trend increased understanding of our stock monitored through monthly reports to Housing Safety & Quality Assurance Board and progress toward HRA Budget MTFs aim of reducing the pressure of responsive repairs and increasing planned preventative maintenance and proactive capital investment in our homes. Shows a decline in volume of</p>	<p>Sponsor: Director of Homes & Investment. Lead: Head of Asset Management & Investment and Head of Repairs and Maintenance.</p>	<p>Procure and award a two-year Stock Condition Survey Contract to enable additional resource to ensure 100% of homes surveyed over this time to support a data led and resident led Asset Management Plan to inform investment decisions. Mobilise spring 2026 complete spring 2028.</p>

Commitment	What residents notice	Why it matters	How we stop repeat failure	How we prove it	Leadership and delivery	Milestones/ Deliverables
<p>We operate as a connected and responsive council focused on clear ownership and accountability. Review areas that cause repeat contact and failure demand. Make ownership and accountability for actions clear at every point.</p>	<p>Clearer ownership and updates. Faster action when an issue is identified.</p> <p>Fewer hand offs, one council approach.</p>	<p>Ensuring fewer handoff's reduces risk and ensures clear ownership and prioritisation of risks tasks and actions.</p> <p>rework, and loss of trust.</p>	<p>Quantitative review of repairs raised to understand the source, including whether raised by tenant, operative in site or via another team. Review repairs by property to understand high volumes in particular homes or property type. Qualitative review in partnership with tenant focus groups / via tenant engagement.</p>	<p>responsive repairs over time.</p> <p>Resident feedback confirms clearer ownership and updates. Regular review of repairs reports to increase % of repairs that are resolved first time where possible. Measuring prevalence of repeated visits both qualitatively and quantitatively to track reduction.</p>	<p>Sponsor: Director Homes & Investment Lead: Head of Housing Asset Management & Investment</p>	<p>Improved resident satisfaction measured through reporting outlined below in evidence of how er will achieve.</p> <p>Review via Housing Safety & Quality Assurance Board which tracks responsive repair and other key health, safety</p>

Commitment	What residents notice	Why it matters	How we stop repeat failure	How we prove it	Leadership and delivery	Milestones/ Deliverables
						and quality activity

How we will evidence that this has been achieved

- Annual Survey of Tenants & Residents (STAR) and Tenant Satisfaction Measures. [Housing performance – how are we doing?](#)
- Performance reporting (shared quarterly with Housing Area Panels: [Performance reports - council housing](#)
- Housing Safety & Quality Compliance Updates reported to Cabinet on a 6-monthly basis: [Procurement of Housing Stock Condition Contractor.pdf](#).
- Regular Housing Safety & Quality Compliance Updates to Place Overview & Scrutiny Committee: [Housing Safety and Quality Compliance Update.pdf](#).
- Council Plan progress updates to Cabinet which include Housing KPIs [202526 Mid-year Council Plan progress update.pdf](#)
- Scheme of management now in place, to be kept up to date.
- Staff Survey and regular 'Pulse' surveys.

Theme 3 - Leadership and culture

Theme of non-compliance: Leadership & Culture provides the platform for effective governance and decision-making; however, organisational culture sometimes disempowered staff, created psychological unsafety to share concerns or ideas, delayed escalation of issues, and diluted responsibility for managing risk through ambiguity and fragmentation.

What is changing: We will ensure consistent, robust leadership and clarity around when and how concerns are escalated, so that issues are surfaced early and addressed decisively, including:

- Promotion of psychological safety;
- Distribute leadership and decision making through a scheme of management;
- Embedding a more connected council with leadership that brings critical resources together to deliver Council Plan outcomes.
- Use of data to measure individual and team performance.

What it looks like to be a Great Landlord

- Stronger frontline empowerment in risk identification.
- Data informed performance management.

Outcome on service quality and tenant experience,

Residents feel the difference when decisions are made faster when something goes wrong. Ownership is clear. Updates are clearer. Problems are resolved consistently.

In 2026 to 2027 we will embed the culture of being a learning organisation – Staff will receive relevant training and support to give them the confidence to report concerns and mistakes; the senior leadership will promote a no-blame and learning culture so that staff have the psychological safety to own problems, feel empowered to resolve issues and where there are concerns and mistakes, report them at the earliest opportunity.

How we will evidence that this has been achieved.

- Scheme of management now in place, to be kept up to date.
- Staff Survey and regular 'Pulse' surveys.
- Council Plan progress updates to Cabinet which include Housing KPIs [202526 Mid-year Council Plan progress update.pdf](#)

Commitment	What residents notice	Why it matters	How we stop repeat failure	How we prove it	Leadership and delivery	Milestones/Deliverables
Senior leadership will ensure that there are opportunities for staff to meet residents where they are (outside of applying their trade), share concerns and ideas, feel confident to try things and know that they working in a no blame culture that promotes learning from experiences and applying that learning to service improvements.	<p>A confident workforce that hears and values the voice of residents.</p> <p>When visited for a repair, operatives raise other issues that they've noticed need doing.</p>	A confident workforce will listen carefully to the voices of residents and spot the need or opportunity to act early or create preventative programmes of works	<p>Senior Leaders holding staff drop-ins, attending toolbox talks and shadowing staff.</p> <p>Frontline staff attending resident meetings in the places that the residents' home is to discuss the issues that they are experiencing.</p>	<p>TSMs for customer satisfaction re repairs and the quality of their home, and being listened to increases.</p> <p>Compliments from tenants and leaseholders about the quality of the interactions they have with staff.</p> <p>A reduction in complaints about the time waiting for, and/or the quality of repairs</p>	<p>Sponsor: Corporate Director Homes & ASC</p> <p>Lead: Business Improvement Manager</p>	<p>Monthly Staff drop ins.</p> <p>An annual roadshow of attending toolbox talks or <i>In-person, in conversation</i> events with corporate leadership team</p>
We apply the learning organisation	Residents notice that we are a	Residents need to know that we have 21 st	The leadership creates opportunities for	Briefing notes and case studies	Sponsor: Director	The directorate is standing up a Learning for

Commitment	What residents notice	Why it matters	How we stop repeat failure	How we prove it	Leadership and delivery	Milestones/ Deliverables
<p>framework throughout the organisation so that we learn from our mistakes and spread good practice</p>	<p>connected council – they report once and it is resolved first time.</p> <p>Residents interact with a confident workforce who explain what we can do, how we will do it, take ownership of issues that may not be within their role, and embraces innovation and creative solutions to service delivery.</p>	<p>century expectations about customer service and we are seeking 21st century solutions to managing stock that was mainly built in the 20th century.</p>	<p>learning such as team meetings, workshops, etc</p>	<p>considered at various management meetings.</p>	<p>Homes & Investment</p> <p>Lead: Programme Director Regulatory Response</p>	<p>Improvement Lab that will review test and learn initiatives across the directorate to promote learning and transferrable benefits from pilots.</p>

Theme 4 - Workforce capacity and capability

Theme of non-compliance: Workforce Capacity & Capability is essential for action; however, key roles were at times unfilled or held by staff who in some cases lacked the relevant competency, experience or ownership of issues. Some staff did not consistently feel empowered to escalate concerns or act confidently.

What is changing: Skilled, confident staff are our most valuable resource. We will: invest in staff development including apprenticeships, technical skills, particularly in areas like fire safety, surveying and data analysis; design structures that create capacity for leadership development in all tiers of management; support a culture of trust and empowerment that enables action to be taken and areas of concern to be raised without fear of blame: and, use digital solutions for transactional/administrative activities so that staff have time to plan and focus on relational activities.

- Managers are working closely with corporate services to develop a 'grow your own' plan, including significant investment in apprentices
- Managers are working closely with HR colleagues to recruit to key compliance roles, including deploying increased staffing resources, over 20 new posts, aligned to additional £1.1m revenue [2025/26] investment to meet health & safety and building safety requirements.

What it looks like to be a Great Landlord:

- Senior leadership understand what people resources in terms of number and competency/expertise is required to fulfil its duties
- Senior leadership have a plan for recruiting and retaining sufficient staff to fulfil its duties
- Resource planning is data-led and evidence-based

Outcome on service quality and tenant experience:

Residents get a more reliable service because the right skills and cover are in place in the roles that keep people safe and work moving. Residents experience fewer handovers, clearer updates, and fewer delays caused by gaps in capacity or unclear responsibilities.

In 2026 to 2027 we continue to invest in our workforce to sustain compliance and service quality. Our approach to service delivery and investment continues to be shaped by feedback from residents and staff gathered through the Creating Great Homes Together consultation, regulatory consumer standards, and our vision for being a Great Landlord. This continued investment in recruiting a Neighbourhood Officer team, a team dedicated to tackling damp and mould, 19 apprentices in the trades of electrics, carpentry, and plumbing, as well as remedial works related to fire safety, water safety and repairs.

We continue to set clear expectations for managers and supervision, and strengthen contractor and client side capability where risk is highest. We will continue to invest in learning and development and work toward a Learning and Development Policy and Code of Conduct for Housing staff, developed with tenants under the Competence and Conduct Standard which comes into effect in October 2026. We will review how we use technology and digital solutions to free up officer capacity so that they can spend time with residents rather than paperwork; and how we involve residents in how we design or improve services.

Commitment	What residents notice	Why it matters	How we stop repeat failure	How we prove it	Leadership and delivery	Milestones/ Deliverables
We are clear on ownership and accountability for critical roles that are responsible for meeting health & safety compliance requirements and ensure resources are in place to cover any gaps.	Improved consistency and clarity with benefits for compliance and customer service.	Ensure workforce capacity and agility where roles remain unfilled to ensure we have appropriate competencies covered to deliver a safe, compliant, high quality service.	Review market supplement for recruitment as well as learning and development and apprentice programmes to ensure skills required to deliver a safe, high quality compliant	Workforce development plan to be put in place to ensure we have appropriate staff resources to enable a safe, high quality, compliant service.	Sponsor: Director Homes & Investment Lead: Heads of Service, supported by HR Business Partner for Housing.	Evidence measures as outlined below through performance reports, health, safety and compliance monitoring and resident satisfaction, including learning from complaints.

Commitment	What residents notice	Why it matters	How we stop repeat failure	How we prove it	Leadership and delivery	Milestones/ Deliverables
			service are in place.			Delivery of workforce development plan and apprenticeship programmes.
We ensure that Housing staff are confident and feel empowered to be a strong client and take a relational and performance led approach to contract management to maximise the contract benefits and ensure delivery against specification.	A consistent, high quality, compliant, resident focused contractor experience. Council contractors meeting the expectations of the contract and council to deliver full service benefits and any contractual social value.	Inconsistent contract management risks poor value for money, compromised compliance and a poor quality service experience for residents.	Improved workforce capacity and confidence, including through appropriate learning and development to develop stronger contract management skills. Monthly contract review for contracts. Risk based quality checks.	Increased resources strengthen client function. Learning & development strengthens contract management skills. Audit through regular checking of monthly contractor meetings outcomes, KPIs,	Sponsor: Director Homes & Investment. Lead: Heads of Service	Directorate Procurement Board to review priority contracts. Evidence measures as outlined below through performance reports, health, safety and compliance monitoring and resident satisfaction, including

Commitment	What residents notice	Why it matters	How we stop repeat failure	How we prove it	Leadership and delivery	Milestones/ Deliverables
			Corrective actions recorded, time bound, and followed up. Escalation used where performance does not improve.	quality assurance and delivery of social value. Improved compliance, service delivery and resident satisfaction.		learning from complaints.
<p>We focus learning support and development on competencies and skills that keep residents safe, services reliable and high quality. Focus on priority areas, starting with Health & Safety, with a view to build on this to meet the</p>	<p>Engagement with a consistently competent, skilled and knowledgeable workforce delivering safe proactive and compliant services.</p> <p>Clear, consistent and timely responses.</p>	<p>Consistency of resident experience and a service delivered by a capable, correctly resourced landlord is key to tenant experience of our service and resident satisfaction.</p>	<p>We will continue to invest in learning and development and work toward a Learning and Development Policy and Code of Conduct for Housing staff, developed with tenants under the Competence and Conduct Standard which</p>	<p>Increased resident satisfaction measured through both quantitative performance reporting, resident STAR survey and engagement with tenants in qualitative</p>	<p>Sponsor: Director of Homes & Investment</p> <p>Lead: Heads of Service, Compliance leads supported by Learning and Development Lead.</p>	<p>By October 2026. Review of learning & development priorities to ensure compliance with Competency and Conduct Standard.</p> <p>Evidence measures as outlined below through</p>

Commitment	What residents notice	Why it matters	How we stop repeat failure	How we prove it	Leadership and delivery	Milestones/ Deliverables
Competence and Conduct Standards			comes into effect in October 2026.	service review and experience. Continued progress in compliance demonstrating ownership, accountability and proactive addressing of risks.		performance reports, health, safety and compliance monitoring and resident satisfaction, including learning from complaints

How we will evidence that this has been achieved.

- Housing Revenue Account Budget and Medium-Term Financial Strategy (for investment in resources including apprentices: [Budget Capital Investment HRA Programme 2026-27 and Medium Term Financial Strategy.pdf](#))
- Staff Survey and regular 'Pulse' surveys.
- Annual Survey of Tenants & Residents (STAR) and Tenant Satisfaction Measures. [Housing performance – how are we doing?](#)
- Performance reporting (shared quarterly with Housing Area Panels: [Performance reports - council housing](#))
- Housing Safety & Quality Compliance Updates reported to Cabinet on a 6-monthly basis: [Procurement of Housing Stock Condition Contractor.pdf](#).
- Regular Housing Safety & Quality Compliance Updates to Place Overview & Scrutiny Committee: [Housing Safety and Quality Compliance Update.pdf](#).

- Council Plan progress updates to Cabinet which include Housing KPIs [202526 Mid-year Council Plan progress update.pdf](#)

Theme 5 - Data quality and use

Theme of non-compliance: Data Quality & Use is critical to sustainable compliance but was undermined by inconsistent maintenance of records, poor data quality, and systems that did not communicate or integrate effectively – weakening assurance about stock condition, maintenance activity and investment priorities, and proactive long-term decision-making.

What is changing: Reliable, well maintained electronic records will underpin planning, assurance and sound decision making. Strong management systems and procedures will safeguard the accuracy, completeness and quality of our data and its effective use to inform and support compliance and our Improvement Programme:

- Significant investment in new Housing ICT infrastructure and compliance monitoring capacity has been undertaken, including moving toward a one system approach through Housing NEC System and use of The Compliance Workbook.
- The consistent performance in electrical compliance has been a blueprint for use of data to inform planning and monitor delivery.
- We have progressed provision of assurance available via electronic records.
- Data is being used to prioritise works and model the resources required to complete identified works.
- Governance is in place to test assurance of data quality, overseen via our cross-directorate Housing Safety & Quality Assurance Board.

What it looks like to be a Great Landlord:

- A great landlord knows the quality of the stock that they own, what works have been undertaken and when, and can use the information held to plan for preventative maintenance and longer-term capital investment in planned and major works programmes.
- A great landlord ensures that their records are up to date and that the data quality informing those records is good.

Outcome on service quality and tenant experience:

We will know our residents and know their homes through consistent and accurate record-keeping. Residents get clear, consistent updates about what is happening in their home and their block. The council spots trends and risks earlier, acts sooner, and explains

progress more clearly. This means that the service becomes proactive and not always reactive. We strengthen stock knowledge so we can prioritise investment and reduce avoidable repairs demand over time.

In 2026 to 2027 we focus on the essentials. We continue work to ensure the datasets we rely on are robust and informative. Management will regularly sample our electronic record systems.

Commitment	What residents notice	Why it matters	How we stop repeat failure	How we prove it	Leadership and delivery	Milestones/ Deliverables
We use sampling and case file reviews, to ensure there is accurate record keeping.	Fewer repeat failures that sit behind headline numbers. More consistent outcomes across teams.	Performance can look acceptable while residents still experience poor outcomes, especially where follow up and communication are weak.	Small risk based sampling plan for priority pathways. Findings trigger corrective action with owners and dates. Re check confirms it is fixed.	Sampling record and findings. Actions taken and re check results. Evidence that repeat issues reduce in sampled areas over time.	Sponsor: Director Homes & Investment Lead: Heads of Services	A sampling plan is in place for priority pathways, with a routine record of findings, actions, and re checks.

How we will evidence that this has been achieved.

- Annual Survey of Tenants & Residents (STAR) and Tenant Satisfaction Measures. [Housing performance – how are we doing?](#)
- Performance reporting (shared quarterly with Housing Area Panels: [Performance reports - council housing](#)
- Housing Safety & Quality Compliance Updates reported to Cabinet on a 6-monthly basis: [Procurement of Housing Stock Condition Contractor.pdf](#).

- Regular Housing Safety & Quality Compliance Updates to Place Overview & Scrutiny Committee: [Housing Safety and Quality Compliance Update.pdf](#).
- Council Plan progress updates to Cabinet which include Housing KPIs [202526 Mid-year Council Plan progress update.pdf](#)

Theme 6 - Responsibility for compliance

Theme of non-compliance: Responsibility for Compliance and Adaptation requires proactive monitoring and response to emerging risks; however, a reactive compliance model missed early warning signs and did not adapt quickly enough to new duties and standards.

What is changing: We will define clear roles and accountabilities for stock quality, safety and compliance. Risk management must move beyond silos. Joined-up teams, and meaningful resident involvement will strengthen trust and meaningful engagement between staff and residents:

What it looks like to be a Great Landlord:

We will know our residents and their homes, be responsive and decisive, and make compliance decisions grounded in evidence, risk, impact, and residents' voices.

Outcome on service quality and tenant experience:

Residents feel safe and more confident in our homes and services. Checks happen on time, follow up happens quickly, and the council gives clear updates when access is needed or when plans change.

This theme exists because unclear duty holder arrangements, weak end to end control, and inconsistent quality checks create repeat failure.

In 2026 to 2027 we will continue to embed controls that ensure compliance.

Commitment	What residents notice	Why it matters	How we stop repeat failure	How we prove it	Leadership and delivery	Milestones/ Deliverables
Ensure that principal accountable persons are supported to	Residents will have confidence about the decisions or recommendations made by the council.	Good health and safety management relies on knowledge and clarity to create	Support the culture of accountability by ensuring that the Scheme of Management is	Confidence to proactively engage with regulators, advocate for resources and	Sponsor: Director Homes & Investment	Scheme of Management accurately reflects who is the PAP for

Commitment	What residents notice	Why it matters	How we stop repeat failure	How we prove it	Leadership and delivery	Milestones/ Deliverables
fulfil their duties	Senior leadership will know that advice will be rooted in professional knowledge.	a culture of robust risk management.	clear about who is the PAP and the council ensures that there are arrangements and opportunities to support personal capability and organisational capacity.	clarity between advisory and mandatory actions. Scheme of Management reflects the responsibilities related to safety compliance	Lead: Head of Housing Safety and Regulatory Compliance	each area of compliance. Recruitment of Head of Housing Safety and Regulatory Compliance Service Plan for Housing Safety and Regulatory Compliance
Ensure that all staff understand their duties as part of being a social landlord responsible for ageing stock.	Staff give consistent advice in relation to issues such as fire safety in communal areas	Consistent advice means that residents trust the advice and act on it to keep themselves and their neighbours safe.	Directorate Health and Safety Plans identify mandatory training.	The directorate's Health, Safety and Wellbeing Board monitors the number of staff that should complete the mandatory training	Sponsor: Corporate Director Homes & Adult Social Care Lead: Business Improvement Manager and Health and Safety Business Partner.	100% completion of mandatory training

Commitment	What residents notice	Why it matters	How we stop repeat failure	How we prove it	Leadership and delivery	Milestones/ Deliverables
Ensure that the overall structure as ways of working within the directorate support the council being a responsive landlord	The council has no wrong door, offers a seamless experience of services and takes a proactive approach to planning service delivery and programmes of works.	Residents need a reliable and responsive council that it can be confident in, in terms of the safety and quality of their homes and estates	Appoint consultants to support developing a Target Operating Model that reflects the council being a 21 st century landlord responsible for mainly 20 th century stock	The Target Operating Model will inform the workforce plan for Housing Safety and Regulatory Compliance and Housing Investment and Asset Management	Sponsor: Director Homes & Investment Lead: Business Improvement Manager.	A Workforce Plan that supports staff being proactive about safety and plans programmes of work focused on preventing or reducing reactive repairs.

How we will evidence that this has been achieved.

- Housing Safety & Quality Compliance Updates reported to Cabinet on a 6-monthly basis: [Procurement of Housing Stock Condition Contractor.pdf](#).
- Regular Housing Safety & Quality Compliance Updates to Place Overview & Scrutiny Committee: [Housing Safety and Quality Compliance Update.pdf](#).
- Regular Updates to Housing Area Panels, including [Performance reports - council housing](#).
- Audit Standards & General Purposes Committee, Code of Corporate Governance and Risk Management Framework: [Code of Corporate Governance and Risk Management Framework.pdf](#)
- Audit, Standards & General Purposes Committee, External Auditor's Annual Report to Audit & Standards Committee [VFM cover report JH.pdf](#)

Appendix 2: Housing Safety and Compliance Performance Indicators

Areas identified by RSH as not compliant

	Jun 24	Sep 24	Dec 24	Mar 25	Jun 25	Sep 25	Dec 25	Mar 26
Smoke alarms/ detectors (% of homes).	81.5%	89.4%	95.7%	97.7%	98.8%	99.3%	99.6%	99.8%
5 Year EICR domestic testing (% of homes).	53.0%	60.1%	67.9%	75.5%	84.1%	91.8%	94.4%	96.8%
10 Year EICR domestic testing (% of homes).	72.0%	76.4%	80.9%	86.7%	91.9%	95.8%	97.4%	98.4%
Communal EICRs (% of communal areas).	20.8%	33%	43.9%	48.5%	61.%	76.6%	80.8%	85.7%
Repairs over 28 days – HRA.	9,653	6,599	6,950	4,134	2,898	2,496	3,409	4,802
*Include Repairs and Damp and Mould from 27 October 2025.								

Areas identified by RSH as not compliant (continued)

	Jun 24	Sep 24	Dec 24	Mar 25	Jun 25	Sep 25	Dec 25	Mar 26
FRAs in High Rise buildings (% of buildings).	100%	100%	100%	30.4%	58.7%	97.8%	100%	100%
FRAs in Medium Rise buildings: (% of buildings).	100%	100%	100%	100%	100%	100%	100%	100%
FRAs Low Rise buildings: (% of buildings).	20.9%	92.9%	99.4%	99.8%	98.8%	100%	100%	100%
FRA remediation actions (snapshot number of live actions). *Exclude Best Practice from March 2025 and includes newly arising actions.	4,253	8,228	8,268	6,420	6,071	3,180	2,869	1,466
Legionella Risk Assessments (% of buildings covered (of 12,730 as of March 2026)).			57.1%	62.1%	81.0%	90.43%	95.1%	96.7%

Wider Safety and Quality compliance data

Carbon Monoxide Detection / Alarms	Jun 24	Sep 24	Dec 24	Mar 25	Jun 25	Sep 25	Dec 25	Mar 26
Total detection in domestic dwellings.		96.6%	97.9%	98.8%	99.6%	99.8%	99.9%	99.9%

Gas/Fuel Safety	Jun 24	Sep 24	Dec 24	Mar 25	Jun 25	Sep 25	Dec 25	Mar 26
Communal Boilers certification in date – annual.	100%	100%	100%	100%	100%	100%	100%	100%
Domestic dwellings certification in date – annual.	100%	100%	100%	100%	100%	100%	100%	100%
Properties with a capped gas supply - reduction in numbers.	40	32	24	19	20	22	23	21

Asbestos Safety	Jun 24	Sep 24	Dec 24	Mar 25	Jun 25	Sep 25	Dec 25	Mar 26
Common ways – Total rolling compliance.	99.4%	99.6%	99.8%	100%	100%	97.38%	99.5%	100%
Asbestos Re-inspection programme – Common ways. Rate of progress.		17.06%	94.9%	100%	24.7%	60.7%	99.5%	100%

Lift Safety (lifts & lifting equipment)	Jun 24	Sep 24	Dec 24	Mar 25	Jun 25	Sep 25	Dec 25	Mar 26
Communal (Passenger) lifts (LOLER) servicing.	100%	100%	100%	97.5%	98.35%	97.54%	96.7%	99.2%
Domestic lift and stair lift, equipment servicing.	100%	100%	100%	100%	100%	100%	100%	100%

Document is Restricted

Document is Restricted

