Brighton & Hove City Council

Council

Date:	**29 January 2026**
Time:	**4.30pm**
Venue:	**Council Chamber, Hove Town Hall**
Members:	**Councillors:** Grimshaw (Chair), Asaduzzaman, Atkinson, Alexander, Allen, Bagaeen, Baghoth, Cattell, Czolak, Daniel, Davis, Earthey, Evans, Fishleigh, Fowler, Galvin, Gauge, Goddard, Goldsmith, Guilmant, Helliwell, Hewitt, Hill, Hogan, Lademacher, Loughran, Lyons, Mackey, McGregor, McLeay, McNair, Meadows, Miller, Muten, Nann, Oliveira, O'Quinn, Parrott, Pickett, Robins, Robinson, Rowkins, Sankey, Shanks, Sheard, Simon, Sykes, Taylor, C Theobald, Thomson, West, Wilkinson, Winder and Williams.

Contact: **Anthony Soyinka**
Head of Democratic Services
01273 291006
anthony.soyinka@brighton-hove.gov.uk

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Chief Executive
Hove Town Hall
Norton Road
Hove BN3 3BQ

Date of Publication - Wednesday, 21 January 2026

AGENDA

Part One **Page**

66 DECLARATIONS OF INTEREST

(a) Disclosable pecuniary interests;
(b) Any other interests required to be registered under the local code;
(c) Any other general interest as a result of which a decision on the matter might reasonably be regarded as affecting you or a partner more than a majority of other people or businesses in the ward/s affected by the decision.

In each case, you need to declare
(i) the item on the agenda the interest relates to;
(ii) the nature of the interest; and
(iii) whether it is a disclosable pecuniary interest or some other interest.

If unsure, Members should seek advice from the Monitoring Officer or Democratic Services Officer preferably before the meeting.

67 MINUTES

To approve as a correct record the minutes of the previous Council meeting(s) which will be circulated separately as part of an addendum for the meeting.

Contact Officer: Anthony Soyinka Tel: 01273 291006

68 MAYOR'S COMMUNICATIONS

To receive communications from the Mayor.

69 TO RECEIVE PETITIONS AND E-PETITIONS

To receive any petitions to be presented to the Mayor by members of the public and/or Members as notified by the due date of 15 January 2026 (10 working days) which will be circulated separately as part of an addendum for the meeting.

70 LEADER AND PORTFOLIO HOLDER'S ANNOUNCEMENTS

To receive announcements by the Leader and Portfolio Holders.

71 WRITTEN QUESTIONS FROM MEMBERS OF THE PUBLIC

A list of public questions received by the due date of 10am on 19 January 2026 will be circulated separately as part of an addendum for the meeting.

72 DEPUTATIONS FROM MEMBERS OF THE PUBLIC.

A list of deputations received by the due date of 10am on 19 January 2026 will be circulated separately as part of an addendum for the

meeting.

73 CALL OVER FOR REPORTS OF COMMITTEES

(a) Call over (items 76 - 82) will be read out at the meeting and Members invited to reserve the items for consideration.

(b) To receive or approve the reports and agree with their recommendations, with the exception of those which have been reserved for discussion.

74 WRITTEN QUESTIONS FROM COUNCILLORS **9 - 16**

A list of the written questions submitted by Members has been included in the agenda papers. This will be repeated along with the written answers received and will be taken as read as part of an addendum circulated separately at the meeting.

Contact Officer: Anthony Soyinka Tel: 01273 291006

6.30 - 7.00PM REFRESHMENT BREAK

Note: A refreshment break is scheduled for 6.30pm although this may alter slightly depending on how the meeting is proceeding and the view of the Mayor.

75 ORAL QUESTIONS FROM COUNCILLORS **17 - 20**

A list of Councillors who have indicated their desire to ask an oral question at the meeting along with the subject matters has been listed in the agenda papers.

Contact Officer: Anthony Soyinka Tel: 01273 291006

REPORTS FOR DECISION

76 ANNUAL YOUTH JUSTICE PLAN 25/26 **21 - 62**

Contact Officer: Tania Riedel
Ward Affected: All Wards

77 PROPOSALS FOR THE FUTURE OF STANFORD INFANT AND STANFORD JUNIOR SCHOOLS **63 - 112**

Contact Officer: Richard Barker Tel: 01273 290732
Ward Affected: All Wards

78 SCHOOL ADMISSION ARRANGEMENTS 2027-28 **113 - 180**

Contact Officer: Richard Barker Tel: 01273 290732
Ward Affected: All Wards

79 BUDGET PROTOCOL **181 - 194**

Contact Officer: John Hooton

Ward Affected: *All Wards*

80 TIMETABLE OF MEETINGS FOR 2026/27 **195 - 214**

Contact Officer: *Anthony Soyinka* *Tel: 01273 291006*
Ward Affected: *All Wards*

81 OUR CITY TRANSPORT PLAN 2035 **215 - 484**

Contact Officer: *Andrew Westwood* *Tel: 01273 292468*
Ward Affected: *All Wards*

82 REVIEW OF POLITICAL BALANCE 2025/26

Report to follow.

REPORTS REFERRED FOR INFORMATION

83 DECISIONS ON EXECUTIVE FUNCTIONS TAKEN UNDER SPECIAL URGENCY PROCEDURES **485 - 490**

Contact Officer: *Anthony Soyinka* *Tel: 01273 291006*

NOTICES OF MOTION

The following Notices of Motion have been submitted by Members for consideration:

84 TOURIST TAX **491 - 492**

85 ENDORSEMENT OF THE RIGHTS OF NATURE BILL **493 - 494**

86 RIGHT TO PLAY **495 - 496**

87 CO-OPERATIVE HOUSING **497 - 498**

88 CLOSE OF MEETING

The Mayor will move a closure motion under Procedure Rule 17 to terminate the meeting 4 hours after the beginning of the meeting (excluding any breaks/adjournments).

Note:

1. *The Mayor will put the motion to the vote and if it is carried will then:-*

   (a) Call on the Member who had moved the item under discussion to give their right of reply, before then putting the matter to the vote, taking into account the need to put any amendments that have been moved to the vote first;

   (b) Each remaining item on the agenda that has not been dealt with will then be taken in the order they appear on the agenda

and put to the vote without debate.

The Member responsible for moving each item will be given the opportunity by the Mayor to withdraw the item or to have it voted on. If there are any amendments that have been submitted, these will be taken and voted on first in the order that they were received.

(c) Following completion of the outstanding items, the Mayor will then close the meeting.

*2. If the motion moved by the Mayor is **not carried** the meeting will continue in the normal way, with each item being moved and debated and voted on.*

3. Any Member will still have the opportunity to move a closure motion should they so wish. If such a motion is moved and seconded, then the same procedure as outlined above will be followed.

Once all the remaining items have been dealt with the Mayor will close the meeting.

FOR INFORMATION

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 10:00am on the eighth 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.

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 of 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.**Attending a Council meeting held in public**
To ensure that Council meetings remain safe and accessible there are a number of measures 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:

- 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 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 may suspend or adjourn a meeting.
We would ask that you respect these arrangements for the benefit of all those attending and participating and to ensure that Council meetings are able to proceed safely in public.

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

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

Brighton & Hove City Council

Council — Agenda Item 74

Subject: **Written questions from Councillors**

Date of meeting: **29 January 2026**

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

Contact Officer: **Name: Anthony Soyinka**
Tel: 01273 291006
Email: anthony.soyinka@brighton-hove.gov.uk

Ward(s) affected: **All**

For general release

The following questions have been received from Councillors and will be taken as read along with the written answer detailed below:

1. Councillor Bagaeen asked:

If the new city licensing policy is meant to keep our communities in the city safer, why have we as a council allowed a substantial number of vape shops, lit up like show rooms, to operate on the North Street – St James's Street corridor?

Response provided by Councillor McGregor, Chair of Licensing Committee:

2. Councillor Bagaeen asked:

What went wrong with gritting during the icy weather in early January at the start of the year and are we learning from past mistakes? This was a reminder of the significant disruption in the city in early January 2025 as a result of a lack of gritting (https://www.theargus.co.uk/news/24844990.snow-chaos-brighton-council-explains-roads-werent-gritted/).

At the beginning of this January, there were a large number of complaints on Facebook pages for groups in Westdene, Patcham and many others across the city. A number of cyclists sustained injuries during this period for lack of gritting, a postman in Westdene fell and broke his elbow, and our refuse collection service in Westdene and food waste collection services ground to a halt as refuse trucks were unable to access a number of streets.

Response provided by Councillor Muten, Cabinet Member for Transport & City Infrastructure:

3. Councillor McNair asked:

All major roads in Hollingbury such as Westfield Crescent, Hartfield Avenue, Fernhurst Crescent and Elsted Crescent should be gritted because of the steepness of the roads and lack of sunlight, making the pavements and roads particularly challenging for the elderly. Could grit lorries be diverted along these roads while in the area to avoid the elderly and vulnerable being left isolated?

Response provided by Councillor Muten, Cabinet Member for Transport & City Infrastructure:

4. Councillor McNair asked:

Over Christmas, there were many missed rubbish and recycling collections across Patcham & Hollingbury (e.g., Sunnydale Avenue, Orchid View) and Westdene; is this due to a shortage of crews despite real-time collection updates, and has crew availability for collections changed since May 2023?

Response provided by Councillor Rowkins, Deputy Leader and Cabinet Member for Net Zero & Environmental Services:

5. Councillor Meadows asked:

When the owners of Patcham Place submitted a planning application to the South Downs National Park Authority to build homes on the site, was the council informed, and if so, why weren't councillors and residents notified, and can the council liaise with the SDNP to ensure residents' views are considered in decisions within our local authority boundaries?

Response provided by Councillor Taylor, Deputy Leader and Cabinet Member for Finance & City Regeneration:

6. Councillor Meadows asked:

Local residents in Patchdean are looking for a place where their children can play and the vacant land at Patchdean appears ideal. It is situated below 27/29 Patchdean on Carden Avenue/Winfield Avenue. It has already been established that it is housing land. I have asked if the residents can be given permission to use it for their children as a safe place to play, but received no response. The individual gardens in Patchdean are too small for many activities. This would require the two entrance points by Carden Avenue to be gated off so no child can run out in the road and to protect any furniture placed in there. Could this be completed under the Estate Development Budget?

Response provided by Councillor Robins, Cabinet Member for Sport, Recreation & Libraries:

7. Councillor Theobald asked:

Residents have written to the Safer Better Streets team concerned about their children crossing Carden Hill at the top of County Oak Avenue. They were told it would be undertaken this year (2025/6) and if it meets the initial criteria, fully assessed next year (2026/7). Has this location been assessed yet and if not, do we know when?

Response provided by Councillor Muten, Cabinet Member for Transport & City Infrastructure:

8. Councillor Theobald asked:

How much CIL money is expected from the Royal Mail development and when can residents expect to receive it?

Response provided by Councillor Taylor, Deputy Leader and Cabinet Member for Finance & City Regeneration:

9. Councillor Lyons asked:

Last month we were assured at Full Council that lessons were learned for the city to be winter prepared & ready. How come that during the first period of icy conditions, roads in Westdene, that in particular were not on a bus route, were not gritted, causing accidents, falls & preventing residents leaving their homes?

Response provided by Councillor Muten, Cabinet Member for Transport & City Infrastructure:

10. Councillor Lyons asked:

I understand from an Officer that the Council has specialist graffiti removing machines that are stored away under bubble wrap, purchased at some considerable expense, some time ago, but never used. Is this proof that the Administration have a laissez-faire attitude towards graffiti removal?

Response provided by Councillor Rowkins, Deputy Leader and Cabinet Member for Net Zero & Environmental Services:

11. Councillor Hogan asked:

What are the council doing to make local tourist attractions more attractive to the public?

Response provided by Councillor Miller, Cabinet Member for Culture, Heritage & Tourism:

12. Councillor Pickett asked:

Re: Item 46b (amended Notice of Motion on Gaza and Council financial exposure) of the meeting of Council on 13th October 2025: Will the

administration specify the precise timescale for the report from officers, on the Council's exposure to companies on the OHCHR list?

Response provided by Councillor Taylor, Deputy Leader and Cabinet Member for Finance & City Regeneration:

13. Councillor Pickett asked:

Which other local authorities within the East Sussex Pension Fund were contacted following the Notice of Motion, when were they contacted, and what responses were received?

Response provided by Councillor Taylor, Deputy Leader and Cabinet Member for Finance & City Regeneration:

14. Councillor Hill asked:

Does the administration support calls to remove the Aim to Permit principle from the Gambling Act 2005? The principle places a legal duty on licensing authorities, including local councils, to favour the approval of new gambling premises unless there are clear grounds to refuse them. Critics argue this significantly restricts councils' ability to respond to local concerns about the social impact of gambling. Politicians including Dawn Butler MP and campaigners from across the political spectrum, have said that the rule 'ties the hands' of local authorities and forces them to grant licences 'regardless of clear social harm or strong local opposition'.

Response provided by Councillor McGregor, Chair of Licensing Committee:

15. Councillor Hill asked:

In Wales, the Children and Families Measure 2010, introduced a Play Sufficiency Duty on Welsh local authorities to assess and secure enough play opportunities. I believe there should be a similar legal obligation for English local councils to ensure sufficient, high-quality play opportunities for children in their areas, recognizing play as crucial for health, happiness, and development. Leeds is seemingly leading the way in England by becoming the first city to complete a Play Sufficiency Assessment, should Brighton & Hove follow?

Response provided by Councillor Daniel, Cabinet Member for Children, Families & Youth Services:

16. Councillor West asked:

On 2 January a Special Urgency Notice reported that a decision had been taken by the Leader of the Council on 31 December to direct award contracts to a temporary accommodation provider. The thin published report, covering less than seven pages, states the contract will run for 6 years, with a total

value of £18.861m. The reason for the urgency and use of Direct Award are unclear other than the stated need to address a £4.8m in-year over-spend and suggestion this contract will save £1.127m annually. No explanation is offered as to why the decision could not have waited until the 22 January Cabinet meeting or been taken at the Special Cabinet arranged for 9 January. While I appreciate the administration is panicking about their failure to manage budget costs, is it appropriate to railroad through such significant decisions without consultation and opposition scrutiny of potential alternatives?

Response provided by Councillor Sankey, Leader of the Council and Cabinet Chair:

17. Councillor West asked:

I am grateful to the cabinet member for his response to my recent question about the summer park and ride. This clearly reveals the scheme to have been an expensive experiment that made little, if any, difference to travel choice. Rather than repeat this political vanity project this summer, can I ask, has any consideration been given to the alternative of investing these precious public funds into supporting and incentivising use of scheduled sustainable transport journeys arriving into the city, e.g. by offering visitors bus and rail ticket price discounts or local retail rewards for taking the green option?

Response provided by Councillor Muten, Cabinet Member for Transport & City Infrastructure:

18. Councillor Lademacher asked:

It transpired in December that the annual fire safety letter sent to residents in Dudeney Lodge, an LPS block found to no longer meet current safety standards for withstanding a collapse in the case of an explosion or large fire, gave residents incorrect evacuation information - advising them to stay put in their homes rather than evacuate. Following this serious mistake was highlighted to the council by an alert resident and Sian Berry MP, the council did thankfully send a corrected letter to residents in the block. The explanation communicated since for the error was "it was an automated mailshot and unfortunately had not been checked for the updated information". Will the administration confirm that all other automated annual fire safety letters sent to residents in other blocks have now been checked to ensure that incorrect fire evacuation advice has not been miscommunicated in any other council blocks.

Response provided by Councillor Williams, Cabinet Member for Housing:

19. Councillor Lademacher asked:

Have all fire risk assessments of external walls (FRAEWs) identified as being required in fire risk assessments undertaken by the council been completed. If any have not yet been completed or commissioned, how many are outstanding, and when will the FRAEWs be completed or commissioned?

Response provided by Councillor Williams, Cabinet Member for Housing:

20. Councillor McLeay asked:

A recent report regarding a new Temporary Accommodation (TA) contract states that the council's use of TA has increased, with 2,150 households placed in such accommodation at the end of November 2025. In January 2023, reports show the number of homeless households in TA were falling, but numbers have since risen. To what extent is the new allocations policy responsible for the increase, and what lessons can be learnt from previous years when numbers were declining?

Response provided by Councillor Williams, Cabinet Member for Housing:

21. Councillor McLeay asked:

As we approach budget council, what actions are being taken to improve HRA rent collection, given that the current rate of 92.75% is down from 98% previously and below the 95.92% benchmark for similar-sized councils, considering that matching the benchmark by 3% could generate over £2 million (enough to fund energy efficiency upgrades for approximately 200 homes) and, while universal credit is an issue for all councils, why are we underperforming and what is the plan to close this gap?

Response provided by Councillor Williams, Cabinet Member for Housing:

22. Councillor McLeay asked:

How does BHCC justify awarding a 6-year Temporary Accommodation contract to Base One, a company incorporated only in 2023, after a two-week decision process without sharing oversight on alternative options, and what safeguards are in place to ensure quality and transparency given reports of poor conditions in other licensed TA properties?

Response provided by Councillor Williams, Cabinet Member for Housing:

23. Councillor Sykes asked:

At end December 2025, how much of the £125k budget allocated to the Palmeira Sq north works from the Parks capital budget remains, will this be spent within financial year and if not will it be carried over to 2026-7?

Response provided by Councillor Robins, Cabinet Member for Sport, Recreation & Libraries:

24. Councillor Sykes asked:

At O&S Place on 21st Jan 2025, when asked about publication of fire risk assessments, I was told that:

“it is our intention to publish them, but at the moment we’re going through and verifying them all and looking at all the information to make sure it is up to date. So we’ve given assurances that we want to first publish the fire risk assessments for large panel system blocks where a lot of our work has focused, and then we’ll have programme to publish them going forward.”

A year on, why have fire risk assessments still not been published if it remains the council's intention, and by what date will this happen so residents can access and scrutinise important information about the safety of their homes?

Response provided by Councillor Williams, Cabinet Member for Housing:

25. Councillor Shanks asked:

What progression has been made on the agreed policy to bring Seaside homes in to council housing provision , what savings will be acheived from this?

Response provided by Councillor Williams, Cabinet Member for Housing:

26. Councillor Shanks asked:

What is the Administrations decision on the future of New England House?

Response provided by Councillor Taylor, Deputy Leader and Cabinet Member for Finance & City Regeneration:

27. Councillor Fishleigh asked:

When will the second (or third or fourth…) hand street bins that recently appeared on Longridge Avenue in West Saltdean be replaced?

Response provided by Councillor Rowkins, Deputy Leader and Cabinet Member for Net Zero & Environmental Services:

Brighton & Hove City Council

Council Agenda Item 75

Subject: Oral questions from Councillors

A period of not more than 30 minutes is set aside for oral questions from Members, at the expiry of which, the mayor will call a halt and proceed to the next item of business of the agenda.

The following Members have indicated that they wish to put questions to the Leader, Cabinet portfolio holder, Chairs of Committees or Members of the Council that have been appointed to an outside body. The Councillor asking the question may then ask one relevant supplementary question which shall be put and answered without discussion:

Date of meeting: 29 January 2026

1. Councillor Davis:

Local schools

Reply from Councillor Taylor, Deputy Leader and Cabinet Member for Finance & City Regeneration:

2. Councillor McNair:

Recycling over Christmas

Reply from Councillor Rowkins, Deputy Leader and Cabinet Member for Net Zero & Environmental Services:

3. Councillor Fishleigh:

Covenant on land in West Saltdean: Please can I have an update on the current thinking of officers about enforcing the covenant on plots of land in West Saltdean?

Reply from Councillor Taylor, Deputy Leader and Cabinet Member for Finance & City Regeneration:

4. Councillor Czolak:

Area Disabled Facilities Grant

Reply from Councillor Alexander, Cabinet Member for Communities, Equalities, Public Health & Adult Social Care

5. Councillor West:

Devolution and Mayoral Election

Reply from Councillor Sankey, Leader of the Council and Cabinet Chair:

6. Councillor Meadows:

Funding for Social Housing

Reply from Councillor Williams, Cabient Member for Housing:

7. Councillor Earthey:

There has been a lot of talk in national and local press recently about the big rise in claims against local authorities by drivers suffering major damage due to potholes. Some roads in my ward are starting to resemble a battlefield of shell-craters, and may provide fertile ground for future claims. Please provide an update on BHCC's pothole-filling programme, with specific reference to how much of the budget we have spent to date, what additional central government funding may be forthcoming, and what budgetary headroom we have to accelerate our programme of pothole repairs.

Reply from Councillor Muten, Cabinet Member for Transport & City Infrastructure:

8. Councillor Wilkinson:

Area Promenade Refurbishment

Reply from Councillor Rowkins, Deputy Leader and Cabinet Member for Net Zero & Environmental Services:

9. Councillor Pickett:

Waste Management

Reply from Councillor Rowkins, Deputy Leader and Cabinet Member for Net Zero & Environmental Services:

10. Councillor Lyons:

Brighton Palace Pier

Reply from Councillor Miller, Cabinet Member for Culture, Heritage & Tourism:

11. Councillor Baghoth:

Pavement Parking

Reply from Councillor Muten, Cabinet Member for Transport & City Infrastructure:

12. Councillor McLeay:

LPS Block

Reply from Councillor Williams, Cabinet Member for Housing:

13. Councillor Theobald:

Park & Ride

Reply from Councillor Muten, Cabinet Member for Transport & City Infrastructure:

14. Councillor Shanks:

Icey pavements

Reply from Councillor Muten, Cabinet Member for Transport & City Infrastructure:

15. Councillor Hogan:

Occupied tents and vehicles

Reply from Councillor Williams, Cabinet Member for Housing:

16. Councillor Hill:

Adult Social Care provision

Reply from Councillor Alexander, Cabinet Member for Communities, Equalities, Public Health & Adult Social Care:

17. Councillor De Oliveira:

Public/council assets

Reply from Councillor Taylor, Deputy Leader and Cabinet Member for Finance & City Regeneration:

Brighton & Hove City Council

Council Agenda Item 76

Subject: **Youth Justice Plan 2025/26**

Date of meeting: **29 January 2026**

Report of: **Cabinet member for Children, Families & Youth**

Contact Officer: **Name: Tania Riedel**
Email: tania.riedel@brighton-hove.gov.uk

Ward(s) affected: **All**

For general release

1. Purpose of the report and policy context

1.1 Youth Justice Partnerships have a statutory duty to submit a youth justice plan relating to the provision of youth justice services as set out in Section 40 of the Crime and Disorder Act 1998. It is the duty of each local authority, in consultation with partner agencies, to formulate and implement an annual Youth Justice plan, setting out how Youth Justice Services in their area are to be provided and funded, how they operate, and how the functions will be carried out.

1.2 The 2025/6 Youth Justice Plan addresses how services work to prevent offending behaviour and reduce reoffending by young people. It delivers on the Council Plan priorities of a fair and inclusive city and a healthy city where people thrive.

1.3 The Youth Justice Board are prescriptive on the structure of the plan and what needs to be included – this results in a very detailed document.

2. Recommendations

2.1 Full Council notes the city's Youth Justice Plan and supports the activity detailed therein.

3. Context and background information

3.1 The local youth justice arrangements are agreed and owned by the Brighton and Hove Adolescent Partnership Board. This partnership fulfils the statutory functions of a youth justice partnership. The statutory partners are Brighton & Hove City Council, Sussex Police, the National Probation Service and NHS Sussex. Voluntary sector and school representative also form part of the Partnership Board.

3.2 The city's Youth Justice Team is integrated into the Specialist Adolescent Service. A Complex Adolescent Strategy outlines the work and priorities for this complex cohort of children. The annual Youth Justice Plan sits beneath this strategy.

4. Analysis and consideration of alternative options

4.1 The development and submission of an annual Youth Justice Plan to the national Youth Justice Board is a statutory requirement. There is a prescribed template that all Youth Justice Plans must adhere to.

5. Community engagement and consultation

5.1 One of the key priorities for the Complex Adolescent Strategy is to increase participation and the voice of the child. A participation worker has been appointed to progress this important area of work. There is ongoing work on developing a social media presence to engage with children and young people, with the service Instagram having over 650 followers. Children and young people are involved in the recruitment of staff; meet with regulatory inspectors (Ofsted and HM Inspection of Probation). Their views are sought throughout, and at the end of interventions to inform service delivery. The chair of the Adolescent Partnership Board has met with a group of young people to hear their views about access to services. Young people present to the Adolescent Partnership Board and there is an ambition for a young person to co-chair the Board going forward.

6. Financial implications

6.1 There are no financial implications because of the recommendations of this report

Name of finance officer consulted: David Ellis Date consulted: 15/01/26

7. Legal implications

7.1 Pursuant to Section 40 of the Crime and Disorder Act 1998 it is the duty of each local authority, in consultation with partner agencies, to formulate and implement an annual Youth Justice plan, setting out how Youth Justice Services in their area are to be provided and funded, how they operate, and how the functions will be carried out .

Name of lawyer consulted: Natasha Watson

Date consulted: 15/01/2026

8. Risk implications

8.1.1 The activity detailed in this plan has all been budgeted for. A large proportion of the service offer is funded through short term year on year funding, such as the Youth Justice grant, the Violence Reduction Partnership intervention money and Home Office grants. We often do not hear about the future years funding until late in the year or after the next financial year has begun. The majority of this funding is used for staffing cost. This therefore creates a risk as it results in the loss of good staff we have invested in and create issue with recruitment.

8.1.2 The success of the arrangement relies on strong partnership working. Therefore, change of policy or issues within partner agencies can potentially create a risk. This is mitigated by strong governance arrangements and partnership agreements.

9. Equalities implications

9.1 There is a Children's Safeguarding and Care Anti Racist Action Plan in place, which the Youth Justice Team is part of. The plan has three workstreams - staff support; practice with children and families; the voices of families, children and carers. Staff are becoming more confident about talking about race and significantly more examples of good practice is being seen in quality assurance audits. This is a journey and there is still more work to do.

9.2 Joint training between the Police and the Adolescent Service has supported the difficult conversations required to challenge and address examples of racism and to encourage better joined up work in this area. Performance data is regularly scrutinized by the Brighton and Hove Adolescent Partnership Board. There is disproportionality within the cohort of mixed heritage boys coming to the attention of youth justice professionals and this is an area of focus for the partnership.

10. Sustainability implications

10.1 No implications.

11. Crime & disorder implications:

12.1 The annual Youth Justice Plan outlines the how the youth justice services are delivered in Brighton and Hove City Council. It focuses on preventing youth offending, reducing offending, and ensuring positive outcomes through the partnership arrangements. It is a statutory duty of the Crime and Disorder Act 1998

13 Public health implications:

13.1 Having suitable arrangements in place to divert children away from crime and anti-social behaviour and prevent reoffending will likely have a positive impact upon their emotional health and wellbeing. A reduction in youth crime and anti-social behaviour will have a positive impact on community wellbeing.

14 Conclusion

14.1 The 2025/26 youth justice plan has been agreed by the Brighton and Hove Adolescent Partnership Board. The Board fulfills the statutory functions of a Youth Justice Partnership. The plan has been submitted to the Youth Justice Board in line with statutory requirements.

Brighton & Hove City Council

Supporting Documentation

Appendices

1. Youth Justice Plan 2025/26

Brighton & Hove Youth Justice Plan 2025-2026

Introduction, vision and strategy

Brighton & Hove is a unitarity authority, bordered by the larger county councils of East and West Sussex. It is a vibrant seaside city with a population of around 276,300K (2021 Census), of which approximately 47K are children and young people. With high student numbers, many visitors from surrounding areas and tourism, the population is transient and quite diverse. There is a large LGBT+ community and while residents are predominantly white British/ European (89%), more than a quarter of the population (26%) identify as racially minoritised (all other groups except White/ British). More than a quarter (27%, 21,775 households) of multi- person households in the city are multi- ethnic households. The data shows that households in Brighton & Hove are among the most ethnically diverse in England. While the overall population of the city has increased by 1%, the number of Black and Racially Minoritised residents has increased by 35% since the last Census (BHCC website). From the 2025 school census, 23% of 10- 17 year olds are Black, Asian or mixed heritage and 22% are learning English as an additional language. Therefore, demographic data shows ongoing changes in the diversity of the city population.

Brighton & Hove is a relatively affluent city but has areas of social & economic deprivation and a higher than average rate of drugs deaths. It has the highest number of children living in households where there is substance use, mental health issues and domestic abuse are experienced (191.51 per 1000, compared to 182.1 nationally). A large proportion of serious and violent crime is linked to the drug trade and county lines activity and the associated exploitation is one of the biggest challenges for services working with vulnerable children in the city.

Brighton & Hove has a well established multi-disciplinary Adolescent Service, in which the Youth Justice Service sits. This service brings together the key teams that support the adolescents with most complex needs in the city, including children involved with the criminal justice system, experiencing exploitation, using substances or alcohol and those on the edge of coming into care. The teams work closely together whilst still retaining their distinct identities. The management structures, processes and staff recognise the need to work differently to meet the needs of this complex cohort of young people.

The Adolescent Service works closely with other key partners to deliver on the priorities of this plan. These priorities have been agreed and are led by the Brighton & Hove Adolescent Strategic Partnership Board, which has good attendance and participation from all of the key partners. There is a keen commitment to jointly own the vision to ensure we meet the needs of this cohort.

The Complex Adolescent Strategy (2023-25) is owned and governed by the Brighton & Hove Adolescent Strategic Partnership Board. The Youth Justice plan sits beneath this strategy. The partnership is committed to reducing first time entrants into the criminal justice system; to continue to improve practice to reduce reoffending; and to avoid the use of custody wherever possible. There is also a strong commitment to anti racist work and reducing areas of disproportionality across the system. The Brighton & Hove Adolescent Strategic

Partnership Board has also prioritised increasing participation and the voice of the child and continuing to develop contextual safeguarding practice.

We were extremely proud of Outstanding HMIP inspection in 2021. Since then we have also achieved a level 1 SEND inspection in 2023, and an Outstanding Ofsted ILACS (Inspection of Local Authority Children's Services) in 2024. We feel this was a result of our strong partnerships and dedicated staff team, and the shared ambition to provide the best services possible for our children, their families, and the community. Whilst being really proud of this achievement, we are clear that we will not be complacent. We have continued to strive to make improvements and will do so until we get it right for all our children.

Deb Austin, Corporate Director, Chair of the Brighton & Hove Adolescent Partnership Board.

Governance, leadership and partnership arrangements

The Adolescent Service, with the Youth Justice integrated, sits within Children's Safeguarding and Care branch of Families, Children & Wellbeing (FCW) Directorate of the city council. This promotes a good operational and strategic fit with the wider services for children, young people, and their families.

The key principle of the service is that we show young people we care for them, even when at times we do not condone their behaviours. We never give up trying to engage with young people, using reflective group supervision to explore new ideas when things feel stuck.

The service also strives to work with the wider community, for example we are aware young people are being exploited within some local hotels, so we are working with them to address this with an offer of advice and training for their staff.

The Adolescent Service has enabled teams to work in a child centred way focusing on how best to engage with this often-disaffected cohort. We aim to reduce the number of professionals working with each child, removing the need for the young person to have to tell their story several different times to different professionals. We have worked to ensure our office is a welcoming place for young people and they often spend time there with their friends talking with the adolescent workers. This has been a successful way of encouraging young people to engage with the service who were previously reluctant to do so.

The remit of the previous Youth Offending Service Management Board was extended to include the needs of the wider complex adolescent cohort, and therefore better support the local model. The Brighton & Hove Adolescent Strategic Partnership Board has recently been reviewed and is now called the Adolescent Partnership Board. It sits quarterly and is co-chaired by the Corporate Director for Families Children and Wellbeing and the Director of Youth Work for Trust for Developing Communities. All relevant statutory partners are represented at a senior level as well as a representative from the voluntary sector and a headteacher representative. The Board retains a strong focus on youth justice and sets the direction and priorities for the service, as well as overseeing youth justice performance and development. Likewise, in agreement with the Youth Justice Board, the Youth Justice Plan has been incorporated into a Complex Adolescents Strategy. We have ensured that this continues to give appropriate attention to the development of Youth Justice arrangements in the area, setting vision and direction to the service.

The Head of Service (Adolescents) sits within the Senior Leadership Team in FCW. She actively champions the needs of young people and Youth Justice within the relevant partnerships and strategic boards, including the Sussex Criminal Justice Board, the Community Safety Partnership Board, The Sussex Violence Reduction Partnership, and the Brighton & Hove Safeguarding Children Partnership. Along with other Adolescent Strategic Partnership Board members, she raises the needs of this particularly complex and vulnerable cohort of children and young people, and ensures others see them as "child first."

Partnerships are strong in Brighton & Hove, and there is a genuine will to work together to address issues associated with youth crime and support desistance and prevention of crime through provision of services for children, for example strategic partnerships with the police to promote contextual safeguarding and working arrangements with community projects AudioActive (outreach music project) and Brighton Streets (targeted youth work).

The Youth Justice Service has a good reputation internally with the Local Authority, being embedded in social work structurally and aligned with social work practice & policy. Externally, the Adolescent Service has well established and strong strategic and operational partnerships with Police, Probation, and courts, dealing with issues of risk and public protection in a robust manner. Strategically the Youth Justice Service is therefore well placed to the meet the demands of welfare & justice.

5.1 Update on the previous year:

Progress on priorities in previous plan:

The Youth Justice Team is fully integrated into the Adolescent Service. The Adolescent Strategic Partnership Board has set 3 main priorities for 2023-2026:

- To increase participate and the voice of the child;
- To continue the anti-racist journey and address disproportionality; and
- To continue to develop contextual safeguarding practice to better meet the needs of this cohort.

In addition, there were Youth Justice specific outcomes, reducing First Time Entrants (FTEs), reducing reoffending and reducing the use of custody.

- **To increase participation and the voice of the child**

In the last year, the Participation Worker within the Adolescent Service has worked on developing the social media presence to engage with children and young people. We are engaging with young people through Instagram and the number of Instagram followers has increased to 732. Young people have been providing feedback via media about their experience of the service. Things that young people stated were important to them about the service included "Having a safe space to talk", "receiving information [about drugs/ services]" and "emotional support" during difficult times. Parents stated they appreciated "having a reliable and consistent worker".

In respect of Youth Justice, we fund (via vouchers) young people with lived experience to be part of all Youth Justice recruitment processes, for example by being part of the interview

panel. Young people are provided with advice and guidance, are asked to write their own questions for candidates and encouraged to take a full part in the interview process. They contribute to scoring and discussions about candidates at the end of interviews.

We regularly seek children's views throughout and at the end of their disposals and their views are shared with the team as part of developing practice. This has been particularly important as part of relationship -based practice. For the majority of children, their relationship with their Youth Justice worker is central to their experience of the system, and especially that they can trust their Youth Justice worker. We have had feedback from children and their parents/ carers about the quality of their relationships with their Youth Justice workers and what has helped. Young people have reported that they felt "listened to" and understood, and feedback about their Youth Justice workers and the relationships have largely been very positive.

We have recently developed a new feedback process for young people and parents/ carers, which can be completed in person, in writing, online or via text message. The information is being collated and used to inform service development. The majority of conversations have happened as part of the supervision process and we have found that children are honest and open in their responses. Young people were also engaged in the evaluation of the new YJB Diversion Assessment tool this year.

Below are some quotes from young people and parents received this year:

17 year old white male (DTO):

"the knife crime intervention was really good but was too late for me as I was too far into it. This needs to happen for younger kids, like 11 or 12"… " The thing that most helped me was my [Adolescent Support] worker, taking me out and showing me different things to do" ….."When you come from poverty, you need to be shown a different way and other things to stimulate your mind"…. "What I would say to others? Getting involved in dealing drugs was all about trying to get money quick…but that it wasn't worth it".

Parent of YP in transition:

"[YJ worker] has been amazing. Coming from someone who has had services involved for many years, I have to say what an asset you have representing your service. My son has been very fortunate to have [leaving care worker] supporting him as well so thank you for ensuring that my son has the highest standard of service. When you have people like this on your team that's where positive impact and change is achieved for young people and families. I feel very blessed and appreciate the work you do".

Parent of a young person who was exploited:

"I would like to give my thanks and the upmost praise for the whole team… Without all your help and support I don't think we [family] would be in the position we are now, which is so far removed from where we were a few years ago. The time that you have been able to give [young person] has been invaluable, and the understanding that you

have of how young people's lives work is incredible. I will always be grateful to the team helping and supporting me to get through what was an incredibly difficult and challenging period in our lives, and the confidence and perspective my son has now is amazing. Not only is he actively helping to recruit the next wave of social workers but he has even expressed his gratitude to me for the past couple of years! Thank you for listening, and for not judging".

Parent:

"[Daughter] has made huge steps and seems so much happier. I want to thank you for all your support. She is at present feeling sad and a little anxious, maybe vulnerable about the fact she's no longer officially on the books but she's aware its actually a positive thing and a merit to her. You're all a wonderful team and I wish you all the best. Thank you so much."

Parent:

"Thank you so much for seeing [son] the way I see him. You have been the most perfect support he could've asked for. You've been wonderful and helping him understand the choices he makes, and impact that it has as well as finding ways to resolve his problems. I can't thank you enough. I know [son] is a truly wonderful boy…. He has a bright future in front of him. I know School is difficult but I'm so proud of the resilience that he shows….he could've continued along the path that made you guys meet in the first place and he hasn't. You are a wonderful support worker you do an amazing job thank you so much for your support and service and I know [son] has enjoyed working with you".

In December 2024, young people were invited to the Adolescent Strategic Partnership Board meeting development session, where they spoke about their experiences growing up in Brighton & Hove and what it is like for young people in the city. The discussion covered their views about bullying, discrimination, crime and serious violence. The young people expressed their views about services, what had been helpful and what they felt young people needed to stay safe and succeed. This feedback has been taken into account in planning for the service. Notably, being listened to, having workers they could trust and opportunities to learn and achieve were highlighted by the young people as most important to them.

We had funding from Healthwatch to seek to engage a group of LGBTQ young people; gathering their views about how substance misuse services, sexual health services and therapeutic support services could better engage this often marginalised community. Surveys of young people within schools (e.g. School Safe and Well at School Survey) in Brighton & Hove have consistently identified that LGBTQ+ young people under the age of 18 have often felt there are barriers to accessing support from support services such as drug and alcohol services.

The aim of the sessions was to encourage co-design of tools that can enable service managers, social workers, frontline workers in drug, alcohol and sexual health services and commissioners of local health and social care services to better understand and serve this community of people. Young people were engaged in co-producing a guide that seeks to help services better engage and serve LGBTQ+ young people. Young people from this group have been actively involved in the delivery of training & awareness sessions for the Adolescent Service about gender and sexuality and the impact of their experiences.

Sussex Police have increased their engagement with children and young people across the county. This has been done in several ways, through face-to-face contact by visiting schools, colleges, and youth groups and through online survey. Questions were asked about how safe children feel, what would make them feel safer, what are the barriers in speaking to Police and what needs to change, whether they would report crime and what Police priorities should be. There were 540 respondents aged between 12 and 24. The results showed that while 1 in 2 children felt Police do a good job, ratings for Police respect and treatment were lower in the Black, Asian and mixed -race cohort. The report included recommendations for Sussex Police.

- **To continue the anti-racist journey and address disproportionality.**

The Youth Justice Service is part of the Children's Safeguarding and Care Anti Racist Action Plan. The plan has been produced by the project board, including senior managers and practitioners and has three main workstreams, staff support, how we are working with children and families and the voices of families, children and carers. We have seen significant improvements in practice in the last year, including staff feeling more confident talking about race and the impact of discrimination, as well as significantly more examples of good practice seen in audits.

Last year, we convened joint training between the Police and the Adolescent Service to support the difficult conversations required to challenge and address examples of racism and to encourage better joined up work in this area. There have been some very successful in person training and arrangements being put in place to continue the conversations.

We continue to scrutinise the performance data and this is shared and discussed at the Adolescent Strategic Partnership Board. We continue to see disproportionality within the cohort of mixed heritage boys in the statutory cohort and we continue to look at ways to address this.

As part of the BHCC Anti-racist pledge, the Adolescent Service are committed to learning and development of best practice in anti-racism to improve outcomes for children and families and to creating a diverse workforce that feel safe and supported. Following completion of Me & White Supremacy workbook across the Adolescent Service (including all staff and managers) we have continued learning and reflection using books and media. This learning continues through the monthly Anti-Racist Forum, which involves learning across wider Children's Services, sharing best practice and discussions of topical issues affecting staff and local communities. Also, learning continues through themed group supervision discussions in teams and manager's meetings.

More detail on disproportionality and measures to address this are included in the Performance section below.

- **To continue to develop contextual safeguarding practice to better meet the needs of this cohort.**

The Safeguarding Children Partnership (bhscp.org.uk) continues to have Safeguarding Children from Violence and Exploitation as one of it's strategic priorities. Our model of Relationship Based Practice, shared across the partnership, aligns with our focus on Contextual Safeguarding. We have systems in place, such as Contextual Safeguarding Strategy Meetings to help provide structure to the work alongside AVRM and our specialist Adolescent Services. BHSCP has completed recent thematic audits on exploitation and children who go missing which has helped drive best practice in these areas and acknowledged the good systems and joint working already in place. This has seen further developments of our work with the NRM Pilot and work with the Police to disrupt and support investigations into perpetrators of exploitation in the city. This activity is overseen by the Exploitation Sub Group that sits under the BHSCP safeguarding arrangements.

The multi-agency thematic audit conducted by the Brighton & Hove Children's Safeguarding Board (BHSCP) identified some key strengths around partnership practices, effective systems and processes to safeguard children and the use of contextual safeguarding. It was acknowledged that even though the multi-agency arrangements and practice was strong, there remained inconsistency in the improvement of the lived experience for some of these children. The findings of this were shared through a learning event. We will use these findings to inform and continue to develop the work in this area.

There is ongoing partnership work with Police in relation to ASB, vulnerability/ exploitation and children at risk of perpetrating serious violence and/ or carrying weapons in the city. For example, Op Safety is a strand of Sussex Police strategy to intervene early to disrupt and reduce serious youth violence by identifying children known to carry or at risk of carrying knives and ensuring they are receiving appropriate intervention. With increasing concerns about knife crime in Brighton & Hove in recent years, Op Safety has developed into a multi-agency oversight meeting, chaired by the Youth Justice service manager and involving key partners in Trust for Developing Communities (TDC), Access to Education, Community Safety and the Police Exploitation team. AVRM (Adolescent Vulnerability and Risk Meeting) is a weekly multi-agency oversight meeting which focusses primarily on children at risk of or being exploited in the city. AVRM also reviews children who present a significant risk to the safety of others.

Brighton & Hove city council is part of a joint National Referral Mechanism (NRM) decision making panel with East Sussex County Council. The panel has been established for over two years now and we are seeing more timely decisions being made in respect for the vulnerable cohort of children. Another positive outcome is that this has enabled the voice of the child to be heard as part of the process.

- **To reduce First Time Entrants**

In B&H we have been working closely with partners with the aim of increasing the number of children safely diverted from the youth justice system, improving support for children and their families in the community and preventing the harmful impact caused by the criminalisation of children. As shown by the data below, the number of FTEs in B&H has reduced comparatively in the last 12 months.

The Adolescent Service is designed to enable appropriate support and intervention for vulnerable children and those coming to notice, and their families, with a range of services delivered by skilled and experienced professionals. The Youth Justice Service has established diversion pathways that respond to the needs of the child and family. Police referrals are triaged, with diversion pathways including specialist drugs diversion via ru-ok? (substance misuse service), Immediate Justice, Turnaround (where appropriate) and Youth Justice intervention. Children open to the YJS have direct access to services such as Family Functional Therapy, support from Psychologist & MH practitioners and Engagement & Support service (bespoke mentoring).

We have continued to develop and strengthen the OOCR offer in partnership with Police. In January 2025, the YJS delivered 5 training sessions for Sussex Police CPD, which focussed on Youth Justice work and OOCRs, specifically the new Child Gravity Matrix and diversion pathways. This has led to better understanding of youth justice work in the Police and we have already seen increased numbers of referrals since January.

There are regular pan -Sussex meetings to ensure alignment of the Child Outcome Pathway across Sussex and share and develop best practice. In 2024, a pan-Sussex audit of OOCR was undertaken to examine decision-making and outcomes. The YJB were involved in advocating for the use of Outcome 22 as deferred prosecution in Sussex. Unfortunately, this is yet to be approved by Sussex Police senior management but the discussion is ongoing.

Turnaround is delivered in partnership with The Trust for Development Communities (TDC). The Turnaround worker is also part of Brighton Streets outreach team, which has facilitated trust and relationships with young people at risk of offending, leading to better outcomes. The Turnaround partnership includes Police, FDFF, Reboot team, YJS and TDC.

The Immediate Justice offer has been funded for a further 12 months (until March 2026) based on the positive outcomes achieved in B&H. There are dedicated RJ workers who work with a range of community projects to encourage children to repair the harm caused by their behaviour.

An Early Intervention initiative has been developed, bringing together local partners involved in crime prevention, including Youth Policing team and NPT, Community Safety and Exploitation team, Trust for Developing Communities and Youth hubs, BCRP (Brighton Crime Reduction Partnership) and YJS to identify children involved in ASB and offending and ensure there is an appropriate response.

- **To reduce reoffending**

Our core aim is to reduce re-offending, to protect victims and communities from harm and to improve outcomes for children within Youth Justice. As noted above, the integration of Youth Justice into Children's Services and as part of the Adolescent Service provides a sound basis for a ChildFirst approach, enabling joined up multi-agency intervention suited to meeting children's complex and diverse needs. The co-location of services facilitates close collaboration between professionals and children's networks. There is similarly close connection between service managers, joint planning and development of the service.

The Trauma Informed model is embedded into practice across the service, with specialist CAMHS practitioners attending reflective group supervision to support staff. In house MH practitioners also provide individual consultation, clinical supervision and advice. Youth Justice practitioners use the five Ps case formulation for assessing young people and have a good understanding of the children they work with. We have a strong partnership with the

local F-CAMHS team, who provide forensic assessment, clinical consultation for staff and networks and direct intervention when violence and risk to others is a particular concern.

There is multi-agency oversight of young people who present a significant risk of re-offending and harm to others via Op Safety and AVRM. Alongside this, there is a strong partnership with local Police and we have an experienced and child centred Police Officer embedded in the YJS, so there is good information and intelligence sharing.

In the last year, we have focussed on developing the offer to victims and increase victim safety. We aim to keep RJ at the centre of our practice and take victim's views into decision making wherever possible.

There has been close liaison with probation to continue to develop Transitions work in the service. We have a seconded Probation Officer in post, who has a split role with YJS and VERU (18-25 adult team) as part of the local arrangement. This role has significantly improved transitions for young people turning 18, providing continuity and access to adult services.

We have a full time Education Advisor, who works directly with schools and the B&H Inclusion Support Service (BHISS) with the aim that all children open to Youth Justice are offered suitable education provision where their needs are met.

- **To reduce the use of custody**

We have continued to work in partnership with local courts to embed a ChildFirst approach whereby custody is only used as a last resort. There is a high congruency rate with PSR proposals and disposals, which demonstrates the credibility the YJS holds with magistrates and judges.

Custody cases are discussed with the Strategic Management Board and deep dives of the data completed when issues are highlighted. Where children reach the custody threshold, there is consultation with the HoS regarding PSR proposals, to consider public protection concerns, risk management and the YJS offer to children at this level. Children and young people are offered robust community disposals in all cases unless the risk to the public is considered to be unacceptably high (i.e. could not be safety managed in the community) and/ or all other options have been tried.

Children identified as at risk of custody are offered an enhanced multi-agency package via the provisions of Youth Rehabilitation Orders, which can include a range of specialist adolescent services, such as Engagement and Support (mentoring), specialist Adolescent Social worker, Ru-ok? (substance misuse); FFT (Functional Family Therapy); support with emotional & mental health via seconded CAMHS practitioner and 1:1 support with education, training or employment. Programmes are bespoke, tailored to individual needs and wishes, with a balance of statutory appointments and activities to enhance engagement. This includes ISS programmes as part of a YRO or Bail Support programme.

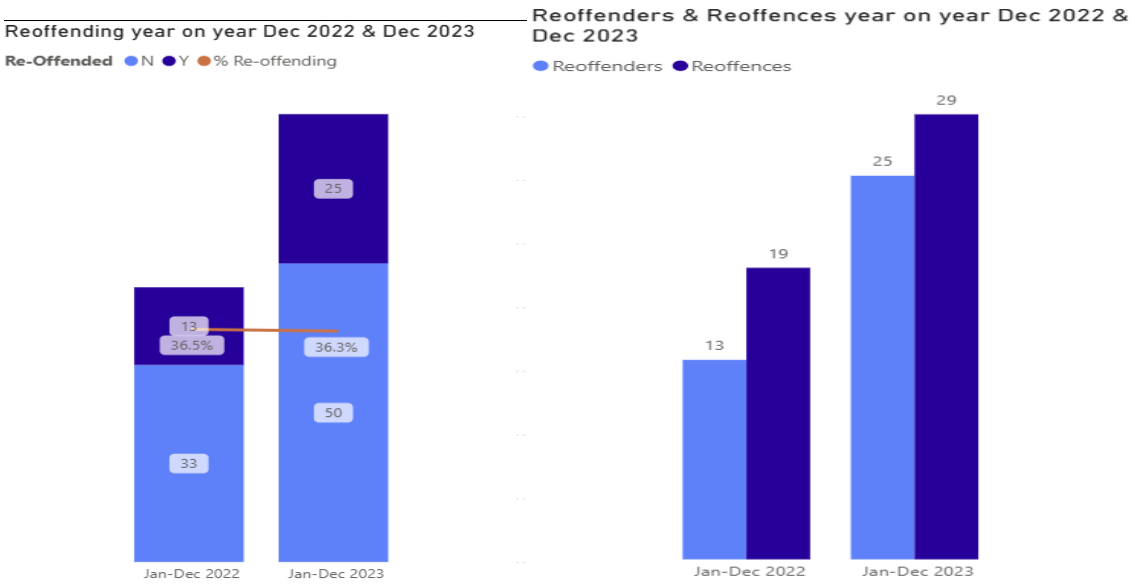
Youth Justice practitioners are experienced, qualified and highly skilled, providing a daily service to the local courts to reduce the use of custodial remand.

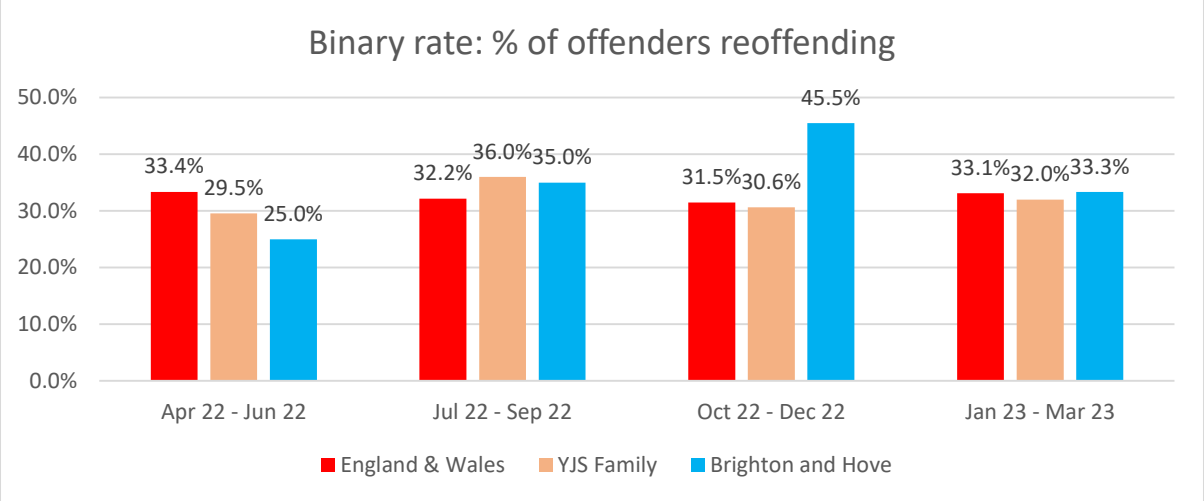
In respect of children being held overnight in custody, there is a protocol in place to prevent this wherever possible, which is monitored and upheld by Police.

Performance over the previous year:

1. **Re-offending rate**

Annual re-offending rates for B&H 2025-2026 with national comparison





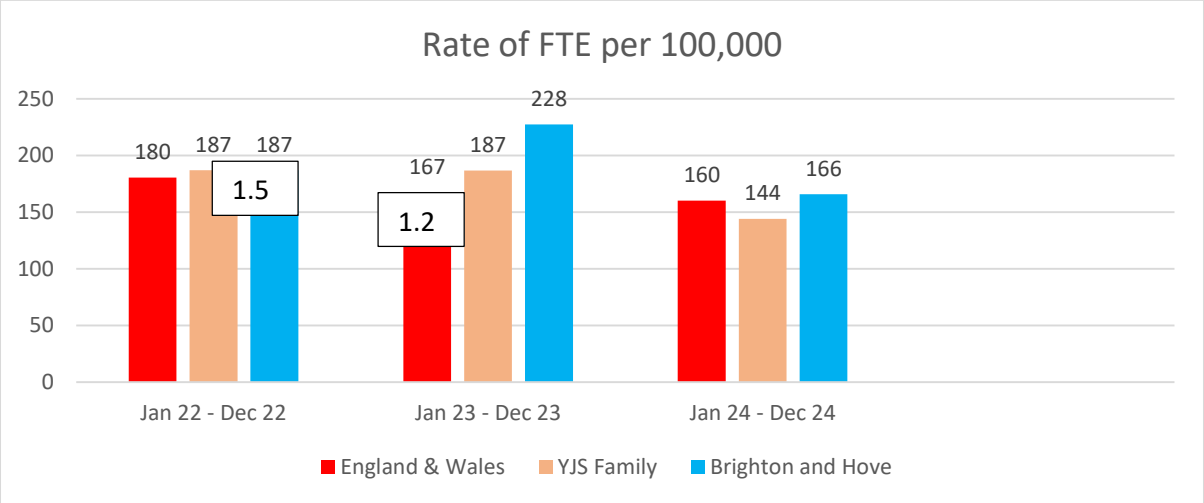
Data shows the binary rate for re-offending (substantive outcomes) in B&H remaining at around 36% a very slight reduction since the previous year. The frequency rate has reduced to 1.16 offences per young person for the 2023 cohort (25 re-offenders committing 29 re-offences) compared to 1.46 in for the 2022 cohort. Overall, this shows some reduction in the re-offending rates, alongside an increase in the Youth Justice cohort.

B&H re-offending rates have overall not been significantly over national or YJS family rates, with the exception of Q3 - and by Q4, rates were in line with the national rate. The quarterly re-offending rate shows considerable variation, which can be explained by the relatively

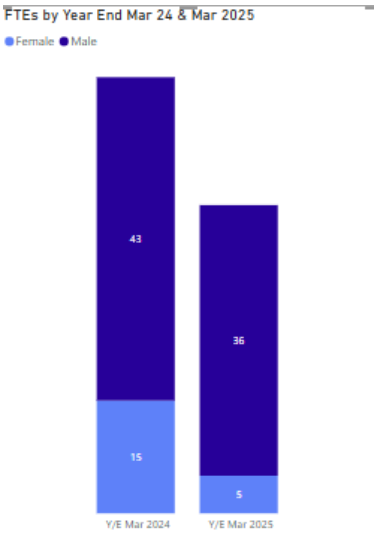
small cohort. Analysis shows that within the high- risk cohort, behaviour can be entrenched and take time to address. These children have typically experienced significant adversity, are impacted by developmental trauma, educational needs and neurodiversity while facing structural barriers. In addition, they are often criminalised through exploitation, which is particularly relevant for children committing knife related and violent offences. Working to reduce the re-offending rate and improve outcomes for this vulnerable cohort continues to be a key priority for the service.

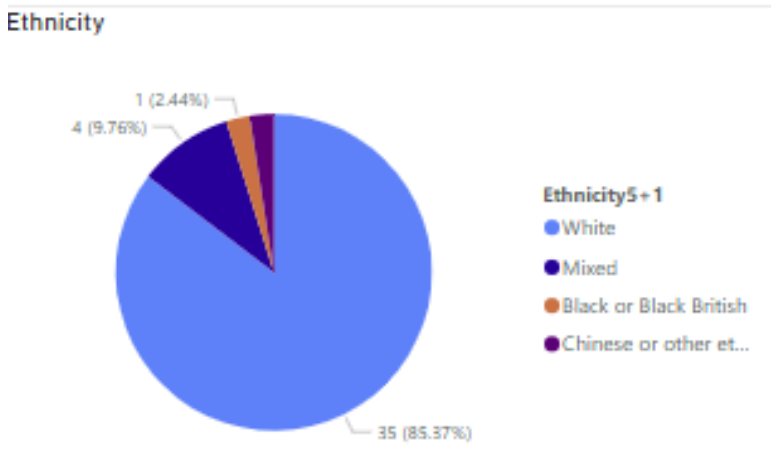
2. First Time Entrants

FTE rate for B&H compared to national and YJS family:

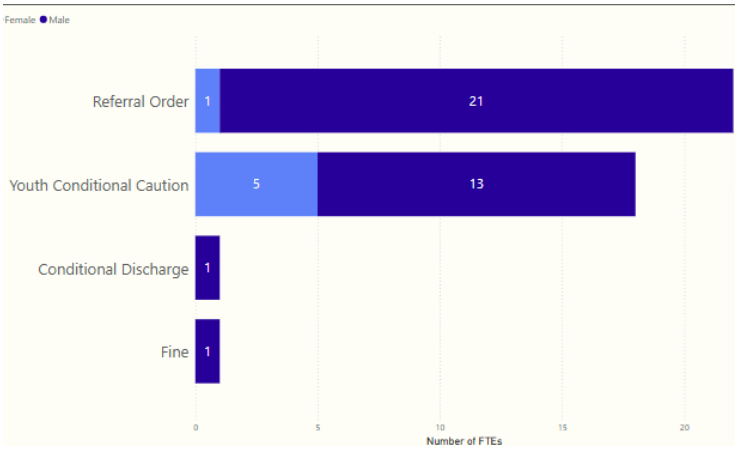


FTEs: Local data (annual) showing gender and ethnicity





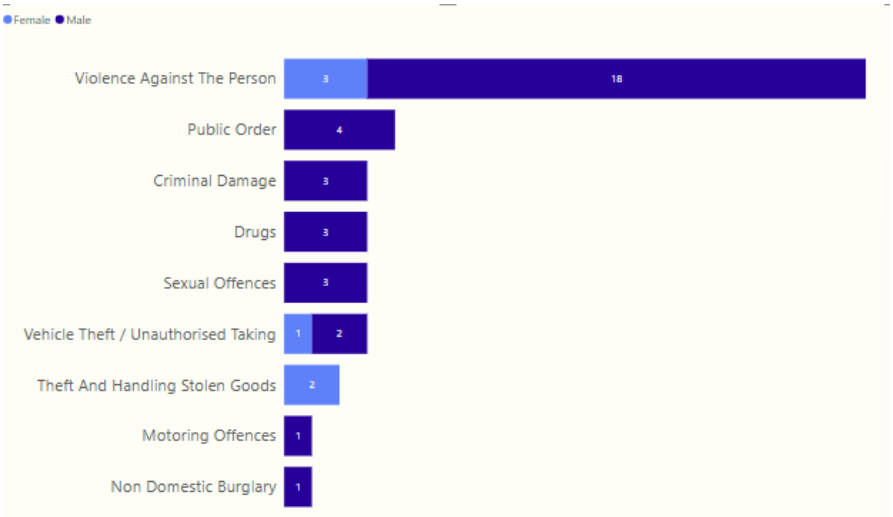
Local FTE data: Outcomes with gender



The data shows that FTEs in B&H have reduced from 58 in the year ending 2024, to 41 in the year ending 2025, a reduction of 17, or 29%. The chart shows a significant drop in female FTEs, from 25% in 2024, to 12% of all FTEs in 2025. The majority of FTEs (22) are Referral Orders, followed by YCCs (18).

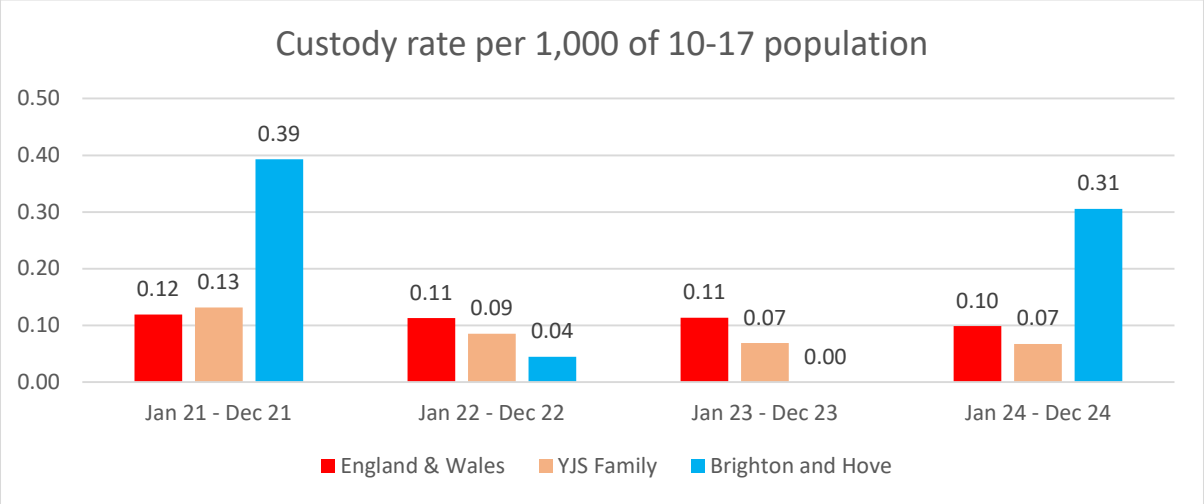
The ethnicity chart shows that black and mixed heritage children are not over- represented in FTEs (mixed race children make up 10.4% of the school age population and Black children make up 2.1% of school age population from 2025 school census). The latter relates to only 1 child in 2025 data.

The chart below shows FTEs by offence type, with violence against the person (including knife crime) being the most common offence for young people. 13 out of the 21 violent offences (65%) were knife related crimes. Of these, 11 were simple possession and 2 were threaten with a knife. The remaining 6 were ABH (3) and assault emergency worker (3). In relation to the drugs offences, one related to the charge of possession with intent to supply Class A drugs and the other two were not the main offence but linked to more serious offences of ABH and Burglary. The analysis of Referral Order FTEs suggests children are not being unnecessarily prosecuted for offences that could have been diverted and most of these children have received an informal OOCR prior to being charged to court (e.g. CR).



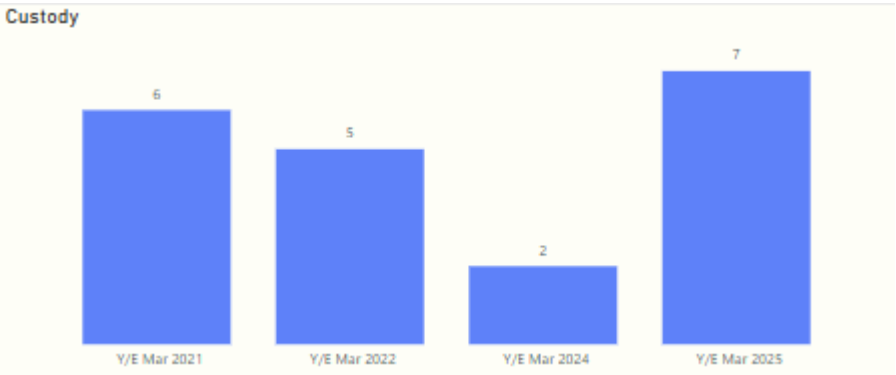
3. Custody

a) Custody rates per 1,000 of child population



In comparison to the national and YJS family rates, the B&H rate for 2024 looks high in certain years, although there is significant variation. For example, very low custody rates in 2022 and 2023 followed by a spike in Jan- Dec 2024. Some of the variation can be accounted for by delays in court proceedings but this may also be due to small cohort numbers.

b) Local data: B&H custodial sentences over 4 years



In the year 2024-2025, seven custodial sentences relate to seven boys, aged from 15 to 17 years. Three are white British, one Arabic (Egyptian) and three are mixed race (Spanish/ Chilean and British/ Black Columbian), showing some disparity in the custody cohort. Index offences include Arson with intent, GBH (S 18), repeat knife offences and breaches of statutory orders. All of these children were known to services prior to their sentences and had received YJS intervention.

The pattern of custodial sentences shows variation over a 5 year period, with an average of 4 custodial sentences per annum. This is within our local target of maintaining custodial outcomes at less than 7 per year, albeit there has been a spike in numbers in 2024-2025.

b) B&H Remand data over 5 years:

As shown in the chart above, there has been an increase in the use of Remand to LAA and secure remand in the year ending 2025. The five RLAA relate to four young people, who were part of a known high- risk offending group in B&H. One young person was subject to RLAA on two occasions, having been released from secure remand to RLAA and subsequently remanded to custody due to breaching RLAA conditions and further offences. After a period on remand he was again released subject to RLAA (via OOA placement).

The nine secure remands in the period relate to seven young people, as two of these young people were remanded twice. The majority of offence types for these young people were GBH S 18 (wounding with knives) and persistent knife related offending, with one for Rape (later acquitted). In 2024- 2025, we saw an increase in violent and knife related offending, mostly committed by a particular high- risk group of young people known to the YJS. Of the 9 secure remands, 6 resulted in custodial sentences, with one acquittal and two community sentences. Of the seven, two young people were mixed race, one Arabic, one Asian (Afghan) and three white.

This represents a spike in numbers compared to the preceding years. The pattern is affected by the fact that the Youth Justice cohort in B&H is relatively small but complex with vulnerabilities highlighted in other sections, especially related to criminal exploitation and contextual risks in the city.

Risks and issues

The main risks to the delivery of Youth Justice services relates to funding. Any reduction in the level of funding to the service would result in a reduction in the level of service provision for this cohort. Reductions to funding to key voluntary sector partners is also likely to have an impact on this cohort as the provide addition support and support desistence related activities. Families are also struggling with the cost of living crisis, causing more pressure on families. This management board is cognisant of these pressures and this is regularly discussed at board in order to work together to find solutions, rather than retreating into silos.

The sufficiency concerns regarding residential placements for those that require it can also be a potential risk to Youth Justice service. This is particularly relevant where secure placements are required from police custody or where a robust care package is required to avoid a custodial sentence for children. The integrated model helps support this challenge,

as the Youth Justice services works in partnership with social care to find creative solutions where possible.

There are times when so lack of understanding between the different partners can create some tension in the system, for example frontline Police being so concerned about particular children that they cannot understand why social care do not seek welfare secure placements for them. It may if fact be that this would not be the best long-term plan for the child, or they may not meet the criteria. The relationships at a senior level are robust enough to have challenging conversations about these cases and agree on a plan on how to resolve such issues.

Plan for the forthcoming year

Child First

The Brighton & Hove Adolescent Partnership Board are fully committed to the Child First principle. The multi-disciplinary model of the Adolescent Service, in which the Youth Justice Service is fully integrated supports this principle. Under this model, children's needs are considered in a holistic way, with Youth Justice being one of the teams in the service and not treated as a separate service. This means that each child's particular needs, strengths, skills and potential are recognised and their best interests are prioritised. The model fully supports the treatment of children coming to the attention of Police as children first and offenders second, with their behaviour viewed through a trauma informed lens, as a symptom of unmet need. Some elements of the Youth Justice work sit within the wider Adolescent Service, for example, including family work, substance misuse, mentoring, mental health and wellbeing.

Partner agencies have committed to the child first approach and work hard to keep children out of the criminal justice system. We try to involve children and young people and work with them to develop and improving the service. We regularly hear the child's voice through their workers or through them attending the board.

The partnership is keen to work collaboratively with children and are seeking a young person to co-chair the board meeting. There are arrangements in place locally in which the Corporate Parenting Board is chaired by young people. This is working well, and we plan to learn from this model. The key partner agencies also have demonstrated a commitment to this, for example Sussex Police has Youth Ambassadors, supporting and promoting child centred policing. There have been specific pieces of work commissioned to ensure we gain the views and experiences of children and young people from global majority communities.

The Youth Justice team are trained in and practice the ChildFirst approach. For example, trauma informed practice in embedded in Youth Justice work. Assessments include a case formulation and young people and their families are discussed through the trauma -informed lens in group and 1:1 supervision. This facilitates exploration of the underlying issues and structural barriers affecting children, with a strong focus on supporting the practitioner and network to manage children's complex needs. Mental health specialists (seconded from CAMHS) provide oversight and clinical supervision, consultation and advice to the Youth Justice Team to support best practice. We also work closely with the Forensic CAMHS team, who offer case consultation, support and direct involvement where required. F-CAMHS offer oversight of SAVRY assessments and consultation where violence/ risk to others is a particular concern.

Resources and services

The Youth Justice Service is integrated into the Adolescent Service. This provides value for money as it ensures that the children and young people get the right support from the right professionals. The YJS budget is a pooled budget; the Youth Justice Board grant provides approximately 10% of the total budget. This grant is sent in accordance with the terms and conditions of the grant and is used to achieve the outcomes and priorities as detailed within this plan.

In addition to this we have received funding for specific areas of work. This has included Turnaround funding from the MoJ and PCC funding for Immediate Justice and Reboot mentoring. Whilst these funding pots are used to deliver discreet areas of work, this contributes to the delivery within this plan.

The majority of the funding goes on staffing which is our biggest resource. Any reduction in funding would result in a reduction in post, and therefore a reduction in service offer. In addition to this funding there are some contributions in kind, such as the seconded Probation Officer and the seconded Police Officer. We have attempted in the past to compare the resource allocation with local or similar demographic Youth Justice Services. This however has proved impossible, as every area has a very different set up and model.

Board development:

The Strategic Adolescent Management Board incorporates the functions of the Youth Justice Management Board. The board is well attended, and Board members play an active role in setting direction and vision for the Youth Justice Service. The Board meets quarterly, and in addition to this there is a yearly extended meeting to review progress and set priorities for the upcoming year. All Board members receive an induction, so the are clear on their roles and responsibilities. Membership is reviewed regularly.

We have recently held a board development workshop to review the priorities and develop this plan. We also reviewed the arrangements and functioning of the board. It was agreed that going forwards the name of the board will change to the Adolescent Partnership Board. The meetings will have themed sessions each quarter, along with a case study which reflect the issues in the themes. The Corporate director for Work will continue to move towards a co-chairing arrangement with young people.

Workforce Development

Brighton & Hove is committed to the continuous development of staff through training, supervision, mentoring and coaching, to support staff progression and retention and offer a high quality service to our children & families. As a learning service, we provide placements to Sussex & Brighton University social work students, offering opportunities for staff to enable the learning of others and develop their own skills.

Youth Justice staff have mandatory BHCC training as part of their initial induction to the service and continuous development is tailored to individual needs via the Personal Development Plan. There are further opportunities for staff to learn through consultation,

shadowing and co-working with partnership staff in the Adolescent Service. Learning is disseminated at team meetings, whole service events, from thematic audits and feedback from children, parents/ carers and victims, as well as stakeholders (Courts, Police, Education, etc).

A wide range of training courses are accessible to Youth Justice staff, volunteers and partnership staff via the Brighton & Hove City Council Learning Zone. This includes courses specific to working with children & families & social work CPD modules. The Brighton & Hove Children's Services Training Plan includes Youth Justice practitioners.

Staff Induction

New staff have an induction for the first 4 weeks, including mandatory training, shadowing, peer mentoring, meeting partners and learning about the service, as outlined below. They are assigned a peer mentor, or 'buddy' to support them, alongside their line manager. An example of this is set out below:

- Meeting your line manager, buddy and team
- Attending Adolescent Service team meetings (Ru-ok?, FFT, SW Pod, Health team);
- Visits to the wider service, FDFF, Family Hubs, etc.
- Shadowing Youth Court, Reparation & Diversion Panel
- AssetPlus & risk management training;
- Child Safeguarding training;
- Shadow AVRM (Adolescent Vulnerability & Risk Meeting)
- Mandatory training (e.g. Child Exploitation, Fair & Inclusive Practice, Health & Safety, Prevent/WRAP, etc).
- Substance Misuse Training
- Familiarisation with Youth Justice policies and protocols, Youth Justice Board case management guidance & National Standards.

Ongoing Professional Development

The B&H Learning Zone provides the core training for practice with children & families and supports continuing professional development of staff. Youth Justice staff can request additional bespoke training relevant to their role or career progression.

The Adolescent Service practices the trauma-informed approach. All Youth Justice staff have received training & consolidation to embed the approach. Seconded MH practitioners and Forensic CAMHS practitioners offer consultation and advice.

Staff can refer to Partners in Change (PiC) for consultation, learning and advice. Through PiC, we also provide consultation and learning for social workers regarding children with sexually harmful behaviour.

Bespoke CPD inputs for the Youth Justice Team completed in 2024-2025:

- Young People, Groups and Gangs: the use of Police Intelligence
- Prevention & Diversion Assessment Tool training (2024)
- MH screening (Anxiety, depression & PTSD)
- Mental Health and TIP
- Neurodiversity and working with parents
- AMBIT model: theory and application to practice (2 days)
- Understanding & supporting LGBTQ+ children;
- Coaching for managers (senior staff)

BHCC aims to become an anti-racist council and a core part of the anti-racist plan is to increase awareness through training, consultation and open forum discussion. Families, Children & Learning (FCL) provides a monthly forum on Anti-Racist practice, which includes seminars led by the Lead Anti-Racist Practitioner. These sessions are designed for all staff and managers to reflect openly on the issues and improve practice with black, Asian and dual heritage children & families. This learning is included in PDPs as part of ongoing professional development.

Planned training for 2025-2026

- AMBIT within Adolescent Service
- Neurodiversity and ADHD in young people
- Child to Parent control & abuse
- Emotion coaching
- Substance Misuse and Young People
- Supporting Trans and gender
- Anti-racist Practice & Allyship conference
- Trauma informed approaches

Supervision & Support

Under the B&H Children's Services Supervision Policy, the service provides weekly reflective group supervision as part of the Relationship -Based model. Alongside this, one to one line management supervision is provided (every 4-6 weeks). Group supervision uses a reflective practice model to enable staff to explore case issues and reflect on the impact of Youth Justice work, with support from their peers. As mentioned above the trauma informed approach is used including consideration of secondary trauma on staff. Individual supervision is focussed on staff development and support, with space for case discussion and oversight of complex or high- risk cases as required.

Managers have an 'open door' policy, whereby they are available to staff at all times for support and guidance. In the YJS there are two senior YJ practitioners, who provide mentoring and support to new or less experienced staff. The senior staff also line manage the RJ workers and Turnaround worker in the team.

Evidence-based practice and innovation:

AMBIT

The Adolescent Service has rolled out AMBIT training since 2024 and this model is being embedded in practice across the service. There is ongoing staff development, including wider services regular training events and team workshops delivered by experts in AMBIT within Children's social work.

AMBIT is an approach to support teams to develop systems of help around particularly vulnerable and excluded children & families. Some receiving services may have little confidence or trust in 'help' being helpful or experience many different teams and professionals around them due to multiple difficulties, making it complicated to coordinate who does what and overwhelming to those receiving support.

AMBIT applies mentalization theory and practice not only to direct work, but to teams, wider multi-agency networks and teams' capacity to learn and adapt. AMBIT assumes that

working alongside people who are experiencing significant distress can (and should) at times cause powerful emotions in workers, impacting in turn on the effectiveness of the help we provide.

Specifically in the Adolescent Service, this means that the teams have focused on their own mentalizing capacities. A focus has then been on how they can strengthen their mentalizing of families and networks and how they can build epistemic trust (with families/young people and also with multi-agency network colleagues).

In the Youth Justice Service, the AMBIT model "Thinking Together" is being used effectively in weekly group supervision to reflect on complex situations and support practitioners with "stuck" cases. Staff are keen to continue to use this model to support case management. Their feedback is captured below:

AMBIT…

"helps with mentalizing ourselves and each other in the team (using the mind check principle and the Yale energy/feeling grid)"

"has been incredibly useful in bringing the team together and people like the task- based focus"

"has helped team cohesion for multiple roles within team (e.g. RJ and caseworkers) and helping created a way to build on being 'well-connected' and how to support each other within the emotive nature of this work"

VR Knife Crime programme

The YJS delivers a structured knife crime programme to all young people referred for knife or weapons offences, as well as those committing other forms of violence, who are suspected to have carried weapons or associate with peers known or suspected to carry weapons. The Virtual Reality knife crime programme includes a short film developed by a London filmmaker with lived experience and consists of three structured sessions, including the legal framework, the VR film and a session to reflect on learning and decision-making. The programme focusses particularly on the impact and consequences of knife crime from different perspectives, including the victim, perpetrator, parents, police, medical staff and friends. The programme is delivered with up to three young people in a group setting or on a 1:1 basis, depending on individual need. It has been designed to be accessible to children who are neurodiverse or have learning needs and is delivered in a way that is tailored to individuals.

In the past year, we have continued to develop the delivery of this programme, based on feedback from young people. For example, a report on young people's views found that 75% of those completing the knife crime programme stated that they carried weapons due to fear of being seriously harmed in the community, believing that having a knife would protect them. The remaining 25% (15+ group) stated they carried a knife to prevent conflict or targeting by their rivals, believing if they had a knife that would de-escalate the situation. We have therefore placed specific emphasis in the programme on safeguarding, with the aim of re-educating children about the increased risk to themselves when carrying weapons.

Knife crime makes up a relatively small proportion of all offending in Brighton & Hove and in line with the national picture, the vast majority of weapons related crimes are simple

possession. However, an analysis of weapons related crime showed that 43% of children who were initially referred for a weapons offence in a 24 month period (2022-2024) went on to re-offend, with 29% committing further weapons related offences in the period, albeit very few involved violence. It remains a concern that knife crime is directly linked to the exploitation of children in the city. The 2024 analysis showed that 5 of the 6 young people in the cohort who committed serious violent offences had an NRM conclusive grounds decision and evidence suggested they were being exploited at the time they were carrying knives and prior to committing serious violence. Op Safety (as outlined above) provides multi-agency oversight of knife crime and violence in the city with an emphasis on providing intervention, appropriate external controls and disruption where appropriate.

VRP & Brighton Streets Project

Brighton Streets is a citywide, coordinated detached (street-based) youth work project providing 6 sessions per week across Brighton & Hove in an effort to provide contextual safeguarding to thousands of young people. It is delivered by a partnership of three local charities, who are all long-term providers of local youth work. The project links closely with different parts of the local system in support of young people who are at-risk of coming to harm, or engaging in criminal activity. For example, it delivers joint operations with Sussex Police, attends and informs Adolescent Vulnerability Risk Meetings (AVRM), targets provision with intelligence from Joint Action Group (JAG) meetings (assessing crime/anti-social behaviour hotspots), and supports the local Business Crime Reduction Partnership (BCRP) by targeting interventions to those young people identified as engaging in risky behaviour through their intelligence gathering. In the external evaluation of the Brighton Streets project, evaluators heard directly from young people on how they had changed their behaviour as a result of the intervention.

Hospital Youth Work has been delivered in the Children's A&E at the Royal Alexandra Children's Hospital since May 2023. In that time, Hospital Youth Workers have supported hundreds of young people who attend A&E where there is social harm as a factor in their attendance (e.g. fights/violence, substance misuse, poor mental wellbeing).

Other developments

The Engagement and Support Service (EAS) has developed an offer for children discharged from mental health wards under Section 117 of the Mental Health act. We are working closely with colleagues from health and social care to ensure that we have robust plans in place to support those children and their families to reduce the risk of a return to hospital. The work involves providing the family with respite support and reintroducing the child or young person back into the community and their networks. We support them with a return to education and activities that improve their emotional well-being.

EAS are also looking at developing a group for young men at risk of criminal exploitation the plan is to engage them with activities and using positive male role models to explore risks linked to drugs, gangs, and exploitation. The idea will be to use peer influence to explore the risks and to try and change some of the behaviours. The group is informal and will be led by young people in terms of developing the programme content.

Priorities for the coming year:

The priorities of this plan align with those of the Complex Adolescent Strategy 2023-2026.Cu These were agreed at the Strategic Adolescent Board, and are 3 year priorities, as it was agreed that focus of these needed to be for a three year period in order to have the time for the achieve the desired change.

The Priorities are therefore as follows:

- To increase participation and the voice of the child;
- To continue the anti-racist journey and address disproportionality; and
- To continue to develop contextual safeguarding practice to better meet the needs of this cohort.

A workplan will outline how the service will achieve this, and how the Youth Justice Team will contribute to this. In addition, there will be the Youth Justice specific outcomes, reducing first time entrants, reducing reoffending and reducing the use of custody. The work plan will contain the following actions:

- To increase participate and the voice of the child.
    - Work to support a couple of young people to be part of the management board.
    - Work with young people to develop the service offer through the service user group.
    - Review of the website
    - Work with partners in the voluntary sector to look at ways to better understand the views and experiences of young people, particularly those of the global majority.

- To continue the anti-racist journey and address disproportionality
    - To the ambition to recruit a more diverse staff team
    - To continue the anti-racist work with the team, including attendance at the anti-racist drop ins.
    - Head of Service and Service Manager to be part of the Safeguarding and Care Allyship model.
    - To analyse data and bring issues of disproportionality to the board's notice for action.
    - To undertake some joint training with partners, such as the police.

- To continue to develop contextual safeguarding practice to better meet the needs of this cohort.
    - To continue to develop contextual safeguarding practices including location reviews.
    - To use the AMBIT model and tools to develop clear processes to further implement working within a contextual safeguarding context.
    - To use contextual safeguarding principles to address the needs of the Youth Justice cohort

YJS Evaluations & Self -Assessment

The YJB Prevention & Diversion Assessment Tool is used for all Out of Court Disposals. B&Y YJ team were involved in the PDAT evaluation this year.

The YJS has undertaken audits of case work in 2024-2025 using the updated HMIP standards as the basis for the audit tool. Results from the HMIP self- assessment are shown below. Overall, the results showed consistently good practice, albeit with some comments regarding recording and timeliness. There was evidence of staff adapting well to the YJB Diversion assessment tool and overall delivery/ intervention was assessed as excellent. The audit plan will be further developed in September when more audits have been completed. We are also planning an audit of victim work in the next year.

Out of Court Disposals:		**Community Disposals**	
Assessment	Good- Outstanding	Assessment	Good- Outstanding
Planning	Good	Planning	Good
Delivery	Outstanding	Delivery	Outstanding
		Review	Good

Strengths	Areas for development	Plan - 2025
Assessment quality in PDAT and Asset is high. Include comprehensive detail, trauma informed with case formulation. Assessments child friendly, contain the voice of the child and are written "to the child"	Some assessments lacked in-depth analysis in ROSH assessment because writing 'to the child' Need to balance child friendly assessments with professional analysis and risk/ safety assessment	Provide guidance to YJ workers on relevant sections of PDAT and Asset Bring to Team meeting for learning
Plans individualised, focussed on strengths. Referral Order contracts well written and include referrals for specialist work (e.g. MH, substance misuse).	Plans need to be clearly sequenced, especially in complex cases. Ensure plans consistently address needs not included in panel/ RO contract (e.g. In Ps & Ps)	Share audit outcomes with YJ workers. Support YJ workers to manage competing priorities / sequence work effectively via management supervision. Further audits to check on progress.
Assessment of safety of children and risk to/ safety of others is strong.	Improve timeliness of assessments in line with 20 working days guidance.	Management oversight
Victim perspective taken account of in decision -making in the majority of OOCR cases at panel (where known)	Needs & wishes of victim not in assessments, as not always known at assessment stage.	Victim contact process being reviewed & new victim policy to be written
Risk management plans on high ROSH cases are thorough and robust, include YPs' perspective	Details of victim protection not included in assessment/ plan in some cases.	Provide guidance to staff on where to include victim safety plan. Victim safety to be included in new victim policy

Contingency plans completed in Asset P&P and PDAT overall robust.		Share good practice examples at YJ team meetings
Excellent joint working & partnership, joined up plans. Good relationship- based work & child centred practice.	Recording in some cases not up to date.	Management oversight/ address in 1:1 supervision
Overall there are regular reviews of Referral Orders, with young people and parents/ carers involved in the plan On YROs Assets, plans and RMPs show regular review with management oversight.	For YROs, 3 monthly reviews of progress with the young person / parents are not always clearly recorded.	Management oversight of YRO cases. Share audit results with YJ team.

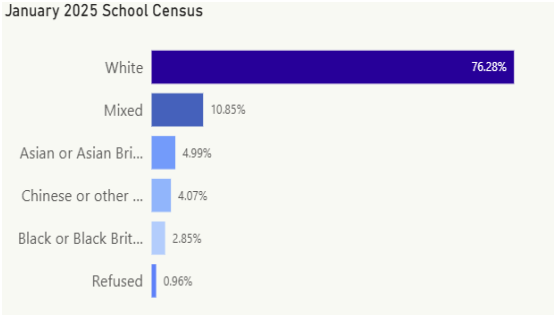
There have been two specific audits of OOCR in respect of decision-making. As noted above, a pan-Sussex audit of OOCR was undertaken in 2024 to examine decision-making and outcomes across the three Sussex Youth Justice areas. Each area provided 4 cases for audit and audited four cases from the other areas. Youth Justice Managers and senior Police involved in the OOCR process met to moderate the audit and discuss the results. The YJB Head of region attended to review the findings and was involved in advocating for the use of Outcome 22 as deferred prosecution in Sussex. This led to discussions with the Chief Superintendent regarding force policy towards the use of Outcome 22.

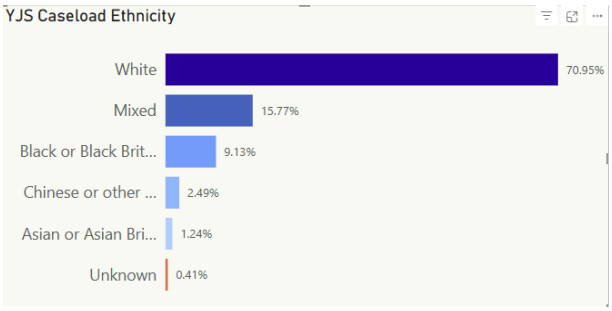
In April 2025, a pan- Sussex Youth Justice Services and Police Scrutiny of Knife Crime Offences was undertaken, with a focus on joint decision-making and adherence to Sussex Police knife crime policy. Each YJS area provided examples for audit and scrutinised cases from the other two YJ areas. The panel included Youth Policing operational and strategic managers, Youth Justice service managers from Brighton & Hove, East Sussex and West Sussex and Youth Justice seconded PCs and Youth Sergeants. For each case, the panel made a judgement as to whether the outcome was proportionate and in line with policy, appropriate but with reservations, or inappropriate/ not in line with policy, reviewed deviations from policy and management oversight of decision-making. Resulting discussions included Child Centred Policing, trauma- informed approaches, the understanding of "Exceptional circumstances" and routes of escalation. There was an agreement that YJ teams could escalate cases for consideration of deviation from the knife crime policy where there are issues relating to age, trauma, neurodiversity, MH and / or circumstances relating to culpability. From the results, Sussex Police have appointed a pan -Sussex Inspector to moderate and oversee decision-making across Sussex to ensure consistency of practice. This is with a view to avoiding the criminalisation of children wherever possible whilst ensuring a robust approach to knife crime in Sussex through appropriate intervention and oversight.

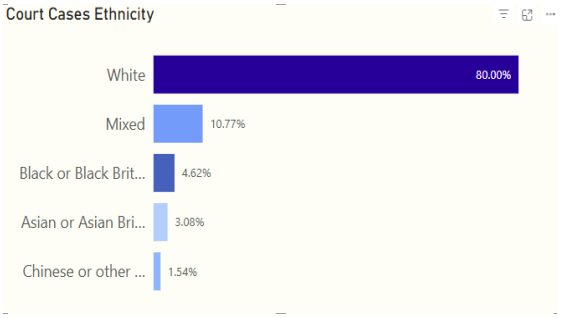
5.3 National priority areas

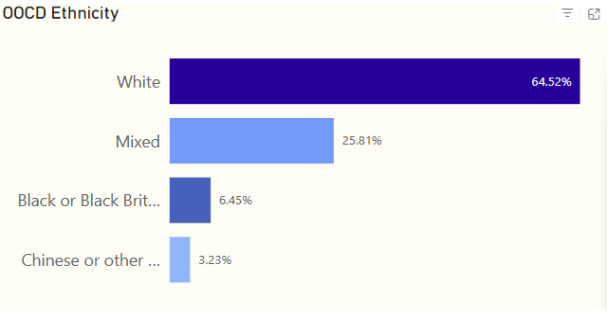
Children from groups which are over-represented:

The charts below show some over-representation of Black and mixed- race children (by 3% each) in the Youth Justice cohort, with other ethnic groups including Asian and Chinese children being under- represented, based on the 2025 school census. This remains a concern, although it is notable that there are relatively higher numbers of mixed- race children in the out of court cohort, which indicates a greater proportion of these children are being diverted from the formal Youth Justice System.









Tackling disproportionality in the Youth Justice System is one of our key priorities, as outlined in the Complex Adolescent Strategic Plan, fully endorsed and supported by the Board, partners and senior leaders in the council. An analysis of caseload data in respect of ethnicity is shared on a quarterly basis with the Management Board.

Practical measures in place include the PACE non-admissions diversion pathway, which is a route for Police to refer children making no comment interviews, where offences are in line with the Child Gravity Matrix for an OOCR. This provides the opportunity for children to receive intervention without pressure to admit the offence formally. Provided the child engages with the assessment process and are willing to complete intervention, they will receive an Outcome 22 (informal disposal). This is monitored by Police in terms of effectiveness and numbers of referrals across Sussex.

The anti-racist pledge includes challenging racism/ discrimination when this is experienced either from partners, staff, children or families in a way that is constructive, non-confrontational and facilitates learning. Any concerns and issues around racism can be

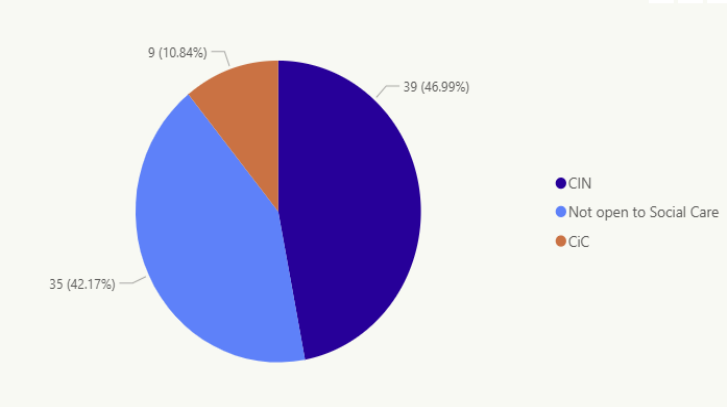
referred for consultation to the PiC (Partners in Change) hub and / or the Anti-racist lead practitioner. This strategy is designed so that children who are within the Adolescent service receive a high quality service and feel safe to talk about their experiences, that they are supported to be empowered and develop their skills and confidence. We seek feedback from Black, Asian, Arabic and mixed- race children on their experiences within the Youth Justice System and their views on what would improve things for them.

We are committed to increasing understanding and awareness of racism and discrimination to ensure that the child's experiences and impact on their social and emotional development can be taken into account in decision-making and plans. There is good management oversight via supervision and a QA process in place, with an emphasis on anti-racist and anti-discriminatory practice, with attention to language and outcomes.

In terms of recruitment, we have pledged to have at least one person from a black or mixed - race background as part of the interview panel across the service. Selection processes include anti-racist practice as part of the essential criteria, for example on application forms and interview questions.

Children in Care

The chart below shows the numbers of Children in Care in the Youth Justice cohort for 2024-2025 including OOCR and court disposals. Two were RYDA, two were subject to full Care Orders, the rest were S 20 accommodation, with two being from out of area LAs. Therefore in terms of B&H Children in Care in the YJ cohort, the number was lower, at 5 young people.



In B&H we remain committed to reducing the numbers of Children in Care (CiC) entering the Youth Justice and continue to work jointly with Police to ensure that CiC are not unnecessarily criminalised. We have an agreement with Sussex Police via the pan- Sussex Joint Policy to Reduce Criminalisation of Children in Care and CiC status is taken into account in decision-making at Police level, the OOCR Diversion Panel and at Court (highlighted in Court reports). CiC in the Youth Justice caseload data is regularly monitored and shared with the Board, which unfortunately continues to show some disproportionality for this very vulnerable cohort. However, it is notable that the numbers over the year remain low, with 9 children & young people receiving Cautions or court outcomes.

Policing:

Sussex Police are key members of the Youth Justice Partnership locally. We have senior level representation on the Adolescent Partnership Board, and at other relevant partnership boards such as the Brighton & Hove Children's Safeguarding Board, The Sussex Criminal Justice Board, The Combatting Drugs Partnership Board, The Prevent Board and the Community Safety Partnership Board. The Head of Service for Adolescents attends the Police led Children and Young People Board. These governance arrangements promote a strong and well -established partnership. The effective partnership at both strategic and operational level has enabled joint working and appropriate challenge to resolve potential issues where required, for example to joint cultural competence training.

In the past year, we have continued partnership work with Sussex Police through Op Safety, Joint Action Group, AVRM and the Early Intervention Group. The Youth Justice Service is active in submitting Partnership Intel forms and this has enabled our Police colleagues to recognise the importance of relationship-based practice.

The Youth Justice Service has a full time PC seconded to the Youth Justice, with the role split between OOCR/ diversion and oversight of high-risk cases. We also have a dedicated Youth Sergeant (not seconded) who oversees decision-making at the OOCR panel and promotes child centred policing in the force.

Prevention

The integration of Youth Justice within the Adolescent Service and sitting under the umbrella of Families, Children and Learning in BHCC means that we are well positioned within children's services, with strong links to Family Hubs (Early Help) and access to relevant information databases.

An Early Intervention initiative has been developed, bringing together local partners involved in crime prevention, including Youth Policing team and NPT, Community Safety and Exploitation team, Trust for Developing Communities and Youth hubs, BCRP (Brighton Crime Reduction Partnership) and YJS to identify children involved in ASB and offending and ensure there is an appropriate response.

Reboot

Sussex Police have commissioned the three Youth Justice services, Brighton, East Sussex and West Sussex to deliver prevention work via Reboot mentoring. The success of this work from 2024-2025 has led to an increased offer from Police for Brighton YJS for 2025-2026, with increased numbers of children being offered the service. This partnership arrangement brings crime prevention services under the Adolescent Service, so that children can access services appropriate to their needs. To date, feedback collated from families has been extremely positive about their experience of Reboot mentoring, examples below:

Young person: Score: 5/5 (Fantastic): "We did some bike rides and played pool. I've enjoyed the session. Spending time to be myself with someone was nice….. I can control my anger a lot more. If I hadn't had you and I had the kick off on Thursday I probably would have killed [friend]. I feel like [YJ worker] understands what's going on for me".

Parent: "From the start, mentoring with [YJ worker] went brilliantly. He [young person] came home after the first sessions stating that [YJ worker] 'got him' and 'knows how to talk to him' and [young person] has never said that about anyone before…. There was never any resistance in attending the mentoring sessions, and [young person] is resistant to most things!"
Parent: "Mentoring was just amazing for him, he really looked forward to the sessions with [YJS worker] and she really knew how to get him to talk to her. Even in his lowest times when he was pretty much refusing to engage with anything he would always still be open to seeing [YJ worker] and I think this says a lot. He would come home happy and settled from the sessions with her and he took part in a few activities he absolutely loved such as Audio active which he is continuing to go to even after mentoring stopped".

Drugs diversion via ru-ok?

Within the Adolescent Service, the ru-ok? substance misuse service offer a point of arrest pathway via Police and Sussex Liaison & Diversion Service. ru-ok? also have skilled practitioners based in secondary schools in B&H, who offer a more informal drop-in service to children with advice about drugs and sexual health. Referral pathways have been established via the NHS A&E departments, paediatric hospital, Youth Justice Service, Front Door For Families (FDFF), Social Work teams, GPs and via self-referrals.

There has been discussion with Police to consider drugs diversion referrals in B&H. A concern has been raised formally with senior Police that 16 and 17 year olds are being referred to an online course Drugslink instead of being referred to ru-ok? where they would receive 1:1 support from an experienced and qualified ru-ok? worker. The ru-ok manager is liaising with Police to promote referral to ru-ok? for 16 and 17 year olds. He is also working with police as part of the local Combatting Drugs Strategy, which seeks to disrupt local drug supply chains and drug related crime. The need for police to refer via drugs diversion into ru-ok? will be promoted within these strategy meetings. This has also been highlighted through the Youth Policing and Neighbourhood teams, including Sergeants, Inspectors and up to senior levels in operational and strategic divisions, as well as via Training sessions delivered to response teams.

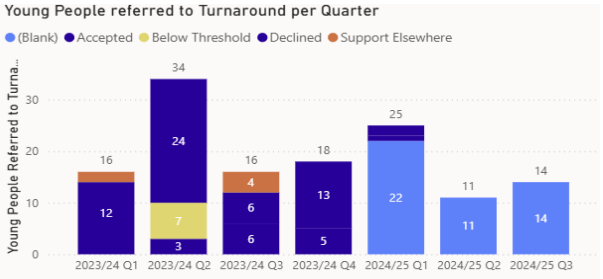
Turnaround

The partnership with TDC (Trust for developing Communities) has continued into 2025, with improved results in the past year. This has also led to improved connections, information sharing and joint working between Youth Justice and TDC, which has helped to identify vulnerable children, those involved in ASB and offending and at risk of exploitation. With the Turnaround programme, we have been able to target children in this cohort and gain a better understanding of particular localities where children are at risk.

The Turnaround worker is a Youth Worker who is involved in outreach support for children via the Youth bus (evenings), so has been able to establish trust and relationships with children in the local area, improving the level of engagement with the Turnaround programme.

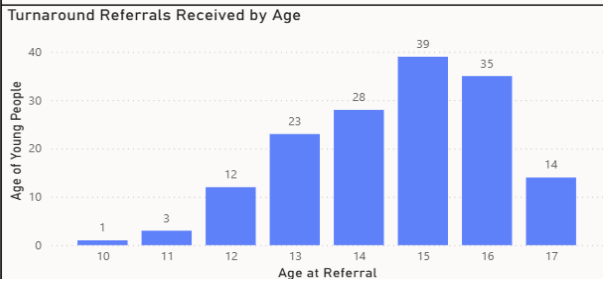
Young People opened to Turnaround
March 2023 to March 2025

38



Young People who have Successfully Completed Turnaround

34



Diversion:

Brighton& Hove YJS is part of a pan-Sussex Joint Out of Court Disposal process, now known as the Child Outcome pathway. The OOCR pathway is well established in B&H and there is consistent partnership and joint working with Police to divert children from prosecution wherever possible and appropriate. The new Child Gravity Matrix has been fully implemented across Sussex and adherence to policy and guidance.

All children referred via this pathway are screened and assessed using the YJB Prevention & Diversion Assessment tool prior to decision-making at the joint panel. Victims' perspectives are a key part of decision-making as far as practically possible, with a clear restorative offer (see RJ section).

Children subject to both formal (YCC) and informal (CRs/ Outcome 22) out of court disposals are offered a comprehensive programme of intervention based on the assessment including safety concerns. They can access wrap around support and provisions of the Adolescent Service, including intensive family therapy, 1:1 emotional & mental health support, tier 2 or 3 substance misuse service and outreach support from the Engagement and Support Service (EAS), which specialises in working with children affected by exploitation. In addition, they can access support with their education/ schooling via the Adolescent Education Advisor, or advice with Education, Training & Employment through the local Youth Employability Service (YES). Engagement with OOCRs is high, with very few cases being returned to Police for enforcement.

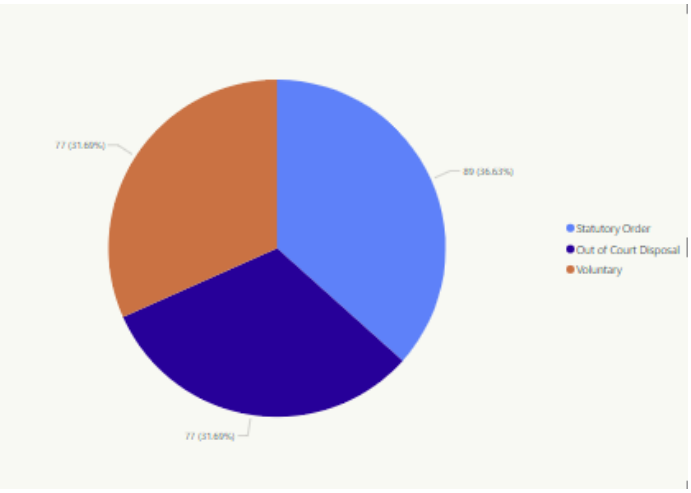
Outcomes for children are overseen via the pan- Sussex Multi-agency Scrutiny Panel, which is attended by the YJS manager. Feedback from this panel is shared with the Youth Justice team and used for learning & development.

The drugs diversion pathway is well established and involves direct referrals from Police or custody suites to Ru-ok? substance misuse service (point of arrest). Children referred by Police for simple possession of Cannabis/ Class B drugs are diverted directly to the Ru-ok? substance misuse service for assessment and focussed intervention. Ru-ok workers are sufficiently trained and qualified to work with children with all levels of risk and vulnerability, including those vulnerable to exploitation.

As shown in the charts below, children accessing prevention and diversion programmes make up a large proportion of the B&H Youth Justice cohort. A significant percentage of Out

of Court disposals are informal outcomes. Voluntary disposals include Immediate Justice, Reboot and Turnaround.

Prevention and Diversion local data 2025:

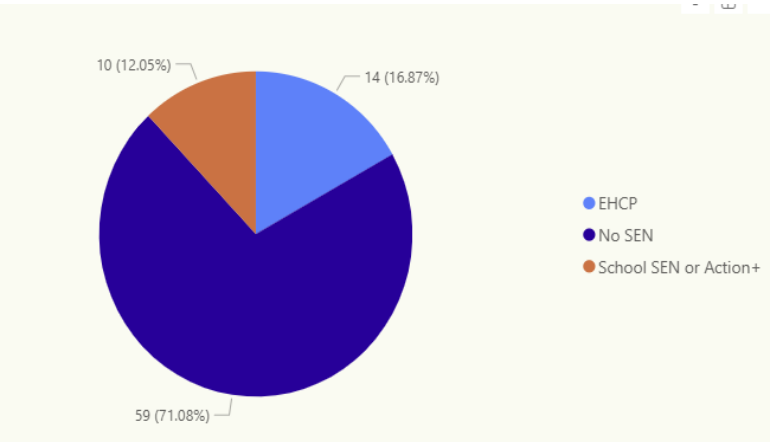


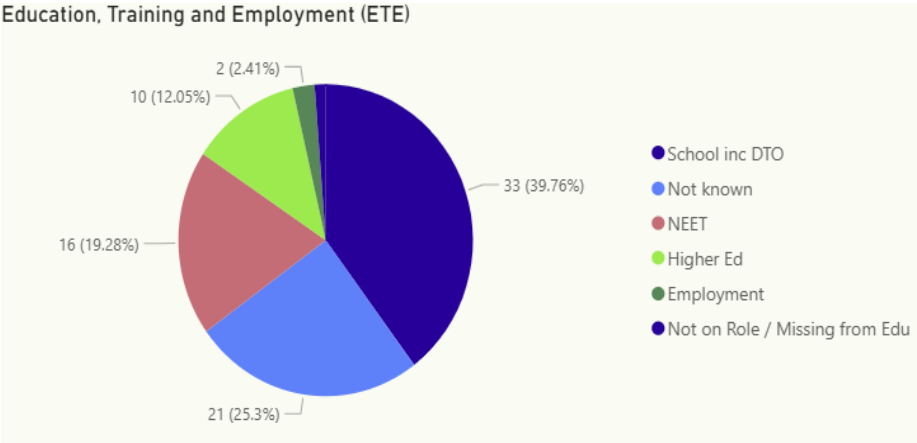
Education

The Partnership has strong links with Education providers in the city through representation both on the Adolescent Strategic Management Board and at the Adolescent Vulnerability and Risk Management (AVRM) meeting. The former has both the Access to Education Manager and a Secondary School Headteacher as key members and the latter includes regular attendance from an Education Lead who chairs the local Behaviour & Attendance Partnership (BAP) meetings, with representation from all Secondary schools (including Academies) the Police, and key Primary schools. The Access to Education Manager is responsible for the prevention of school suspensions and exclusions, school attendance, those who are electively home educated, as well as children with health needs not in school, Children Missing Education (CME) and the regular monitoring of all the children on part time timetables in the city and challenge to all schools regarding their use.

The Adolescent service includes an Education Advisor role, who acts as a conduit to all secondary schools in the city, meets regularly with the Education Adviser for all children with

a Social Worker from the Virtual School and is part of the BAP which meets twice monthly. They also attend the joint agency suspension and exclusion meetings which strategically manages the reduction of suspension and exclusion across the city.





Data taken from ChildView Youth Justice cohort 2024-2025, including court and out of court disposals, shows about 30% of children in the YJ cohort have special educational needs identified. This continues to be closely monitored at quarterly board meetings.

According to the data, 19% of the cohort were recorded as NEET. At the time this data was shared with the management board and added to the YJ Plan, there were a number of 'unknowns' (ETE not recorded) but since this time, ETE records have been updated (some of the unknowns were in the process of assessment, others were NEET) and the current number of NEET young people open to the YJS is 12 (20%). We are working with the data team to understand this cohort better, with the aim of improving outcomes for young people.

Youth Justice has a good partnership with the Youth Employability Service and all young people rising 16 are offered this service where needed.

Restorative approaches and victims

The YJS has a strong commitment to Restorative Justice practice and ensuring the victim's voice is heard. The partnership with Police at strategic and operational levels supports Youth Justice work in this respect, for example, commitment of a full time PC embedded in the

YJS, a quarterly multi-agency OOCR scrutiny panel and close links to the Restorative Justice Police team. All Youth Justice staff are trained in Restorative Justice practice and there is close management oversight of RJ and victim work. We have three full time RJ workers, who are trained in restorative practice and able to deliver effective practice in terms of victim work and community reparation.

In the past year, we have focussed on developing the RJ offer, using feedback victims, community reparation projects, staff and young people. We are currently reviewing the offer to victims to ensure our practice is in line with the HMIP standards and will be completing victim work audits in the next year. There is oversight of victim work and data from the PCC.

We deliver RJ within a ChildFirst and Trauma Informed approach, keeping in minds the best interests of both children and victims of crime. We are committed to listening to children's experiences but also ensuring that they are held to account for harmful behaviour. This is particularly important because many of the children we work with are victims in their own right, whether due to adverse childhood experiences or being victims of crime in their communities. A high proportion of violent crime for example, is perpetrated against children and young people.

There is a clear process in place to ensure that all identified victims of youth crime are contacted where possible, offered support and consulted about their wishes in respect of involvement in restorative justice. Victims are contacted at the earliest opportunity, prior to the joint decision-making panel, Referral Order panel or where possible prior to PSRs being completed. For all young people subject to disposals, a Restorative Plan is created based on the victim's wishes and any risk or safety considerations. This may include direct or indirect mediation, letters of apology and/ or community reparation. We seek feedback from victims, especially those involved in direct mediation or reparation.

Some quotes from victims are shown below:

Parent of child victim of assault (feedback to RJ worker): "You've been amazing… Friday afternoon, after you spoke to [daughter]… she was more talkative… You helped her realise, it's not just her…Thanks for your support, I really appreciate it"

Adult victim: "Thank you, I really appreciated [RJ worker] spending so much time on this matter and talking me through the process"

The Youth Justice Service is committed to making Community Reparation meaningful to young people, by having individualised plans and matching children to community placements based on their offence and strengths or interests wherever possible. Projects include the Forest Garden, where young people maintain the allotments and pick and prepare for local community groups. We work with charities, community cafes and local food banks, helping to organise donations and prepare food for vulnerable or elderly people. AQA's have been attached to community projects, to develop skills and portfolios for young people.

Serious violence, exploitation and contextual safeguarding

There is currently a 3 year Violence Reduction Partnership (VRP) strategy in place that builds on previous annual VRP strategies. It uses evidence from our strategic needs assessment to set out the current picture of serious violence in Sussex and what collective action partners are undertaking.

The strategy includes an explanation of our Public Health approach and our model of delivery, which is a devolved structure, allowing each of our three VRP areas to make their own decisions on where funding and resources are best placed.

We explain how we use and share data to understand the risks and drivers for serious violence and how this, combined with robust evaluation, also helps shape our intervention activity. Our performance indicators and how we continually measure our success are also included.

Central to our approach is our commitment to engaging and consulting with the individuals and communities most affected by serious violence. Our forward plan includes more work to ensure that their voices are represented in our VRP, and that they are informing everything that we do.

Our delivery plan will be reviewed and revised annually, and this highlights the breadth of activity going on across Sussex aimed at reducing individual and community vulnerability to serious violence, exploitation, and other criminal behaviour.

Much progress has been made in the five years since the inception of the VRP, and sustaining this momentum remains a priority for the partnership. This involves all partners working together to embed the response to serious violence in their day-to-day organisational delivery.

This is already happening through the creation of dedicated officers, teams, and structures and through additional funding sources. Over the next 12 months we will be collectively developing our plans to mitigate against the potential ‘cliff edge’ of intervention for those individuals and communities most at risk, ensuring that they continue to receive the support that they need.

This year, the Youth Justice and Adolescent Service attended a Serious Violence Duty Youth Participation event : How to create conditions for Youth Voice in the SVD (Serious Violence Dut. This event focused on building collaboration across statutory organisations. Young people were involved in co-producing this event with TDC (Trust for Developing Communities- local Youth Service) and were part of the design and delivery of the event. The discussions explored how agencies were implementing their duty to actively engage children and young people in planning and delivering services.

Detention in police custody

The Pan Sussex Protocol on Transfer of Young People to Local Authority Accommodation from Police Custody is well established. We have seen a significant decrease in the numbers of young people being held overnight after charge. The process is scrutinised on a quarterly basis with senior members of the police, the HoS and the EDS duty Manager. There is also a process to discuss any cases more immediately where appropriate.

Remand to Youth Detention Accommodation (RYDA) & Remand to Local Authority Accommodation (RLAA)

Avoiding the use of secure remands unless absolutely necessary for reasons of public protection remains one of the Youth Justice Service core aims and priorities.

We have a joint protocol with local magistrates courts (pan- Sussex Courts Agreement 2024), which details operational guidelines for Youth Justice Services and Courts. For example, children at risk of remand are dealt with as a priority by courts and consideration for RLAA is given prior to secure remand, as per legal guidelines. The agreement covers provision of services to the local courts (including Saturday & Bank Holiday courts) to ensure children's welfare and rights and maintained and reduce unnecessary remands. This agreement highlights the child's right to Bail and the principle that all children at risk of secure remand are assessed for bail and offered a robust bail programme unless the risk of harm to the community/ victims is deemed unacceptable. This principle is supported by Senior Leadership Teams and Management Boards.

Brighton & Hove have small but experienced, skilled and dedicated team of court officers. The co-location of the Youth Justice service within the Adolescent hub enables provision of intensive wrap around individually tailored programmes for children subject to bail as an alternative to custody. Supporting this, there is a strong partnership between Youth Justice and Children's Services and arrangements in place with Children's Placement Team (CPT). For example, all children at risk of remand are notified immediately to the Social Worker and CPT. B&H YJS holds credibility with the courts in terms of assessments, risk management planning and the offer to children & families, and there is a high congruency rate with Youth Justice proposals. Across Sussex, we have developed relationships and lines of communication with youth leads for Legal Advisers, CPS, magistrates and district judges and there are regular pan Sussex courts meetings where court issues and YJ developments can be discussed. This provides a forum for feedback between the Courts and YJ services and oversight of emerging court issues.

Use of custody and constructive resettlement:

It remains a key priority to minimise the use of custodial sentences. In principle and practice, we will offer community disposals (including bail supervision and support) to all children, even those committing serious violent offences, where we believe that the safety of the child and others can be effectively managed in the community by appropriate intervention, monitoring and controls.

There is a strong strategy in place to support this commitment to preventing children from entering secure settings. Rates of custody are regularly monitored by the Board as part of quarterly performance data and deep dive analysis completed where custody rates increase. Through the use of Intensive Referral Orders, ISS or alternative intensive programmes, the Youth Justice Service offers individualised wrap around programmes for children at risk of custody, based on their needs and abilities. This may include intensive social work support, mentoring constructive activities (via Engagement and Support team), substance misuse work, family therapy, MH & wellbeing support, community reparation and support with education, training & employment (via partner agency YES).

The YJ workforce are qualified and highly skilled, with the expertise to manage children presenting a high level of risk to others in the community in liaison with partners. There is good collaboration with Police and regular multi-agency oversight via Op Safety and AVRM. For example, all children assessed as presenting a high level of risk to others are discussed

at the Adolescent Vulnerability and Risk Meeting (AVRM), a weekly multi-agency forum with a focus on Exploitation. Risk management and safety plans receive multi-agency and HoS oversight.

The YJS has a strong relationship with wider Children's Services, who recently received an Outstanding Ofsted rating for the service to children and families in B&H. There is close collaboration and joint working with Children's Services, given the Youth Justice Service integration within Children's Services, and lines of accountability being direct to the AD and director via the Head of the Adolescent Service.

In respect of Resettlement, there is also good partnership work with the Probation Service and Children's Services (including Leaving Care team) to optimise opportunities for children on release from custody and those transitioning to adult services. The Probation Lead (Advanced Practitioner for Youth Justice) manages the seconded probation officer and attends regular meetings regarding transition. The seconded Probation Officer is the allocated PO for 17-18 years olds transitioning to probation. The PO has a split role between the Youth Justice and in VERU (18-24 team). This promotes relationship-based practice and continuity for young people transitioning to the adult estate or to probation when subject to Licence.

Youth Justice practice follows YJB case management guidance, using constructive resettlement and the identity shift model, focussing on developing pro-social identity, identifying and building on the young person's strengths and skills, with a strong desistance focus. YJ practitioners are well sighted on evidence based practice in resettlement in respect of the above models of practice. There is a strong focus on relationship-based work and maintaining a high level of contact with young people via regular visits to secure facilities, phone calls and virtual contact. Youth Justice workers prioritise the child's safety and wellbeing throughout their detention.

There is close management oversight of all custody cases, with escalation processes in place for safety concerns. We have good connections with the leads for resettlement and safeguarding at YOIs (e.g. Feltham), STCs (Oakhill), SCH (e.g. Vinney Green) and Oasis Secure School.

Working with families

It has been emphasised in the plan that the integration of the Youth Justice Service within the Adolescent Service and wider Children's Services provides strong strategic and operational links to the Family Hubs (Early Help) and enables the YJ team to work closely with partners, particularly around ensuring a joined up working with whole families. All YJ workers and managers have direct access to Children's Service database (which is the same as Family Hubs- Early Help). With the Transformation of Children's Services imminent, it is hoped this will improve further connections between early help and statutory services. The Head of Adolescent Service is part of the Senior Leadership Team in the Safeguarding and Care branch of the Families, Children and Wellbeing Directorate. On strategic and operational levels, whole Family working is therefore embedded in Youth Justice practice in Brighton & Hove. These working arrangements are further supported through the developments of the AMBIT model of practice, which has been rolled out throughout the Adolescent Service and wider Children's Services with ongoing service wide training and practice workshops.

Within the Adolescent Service, there is an experienced and trained team of family therapists, who offer Family Functional Therapy (FFT) to all families in need. This offer is focussed on preventing children entering care or custody by strengthening parent-child relationships and building resilience within families. The model is proven to help reduce offending behaviour

by giving children more stability and attachment to their families. The pathway to FFT is via Front Door for Families or Children's social work, with families screened for specific criteria, which include children coming to notice of police, exploitation concerns and family breakdown. The FFT team have been co-located with Youth Justice since prior to the 2018 restructure of the service, so there are well established relationships between Youth Justice and FFT, at both management and practitioner level. The FFT manager attends weekly AVRM (exploitation & risk) meetings and Adolescent Service manager's meetings, so has oversight of the most vulnerable children and young people in B&H. FFT practitioners have attended YJ team meetings to provide training and advice. Overall, this ensures that family therapy is well understood in the service and accessible to families meeting the criteria.

Signed

Designation: Co-chair Brighton & Hove Adolescent Partnership Board; Corporate Director Families, Children & Wellbeing, Brighton & Hove City Council

Date: 30 June 2025

Glossary

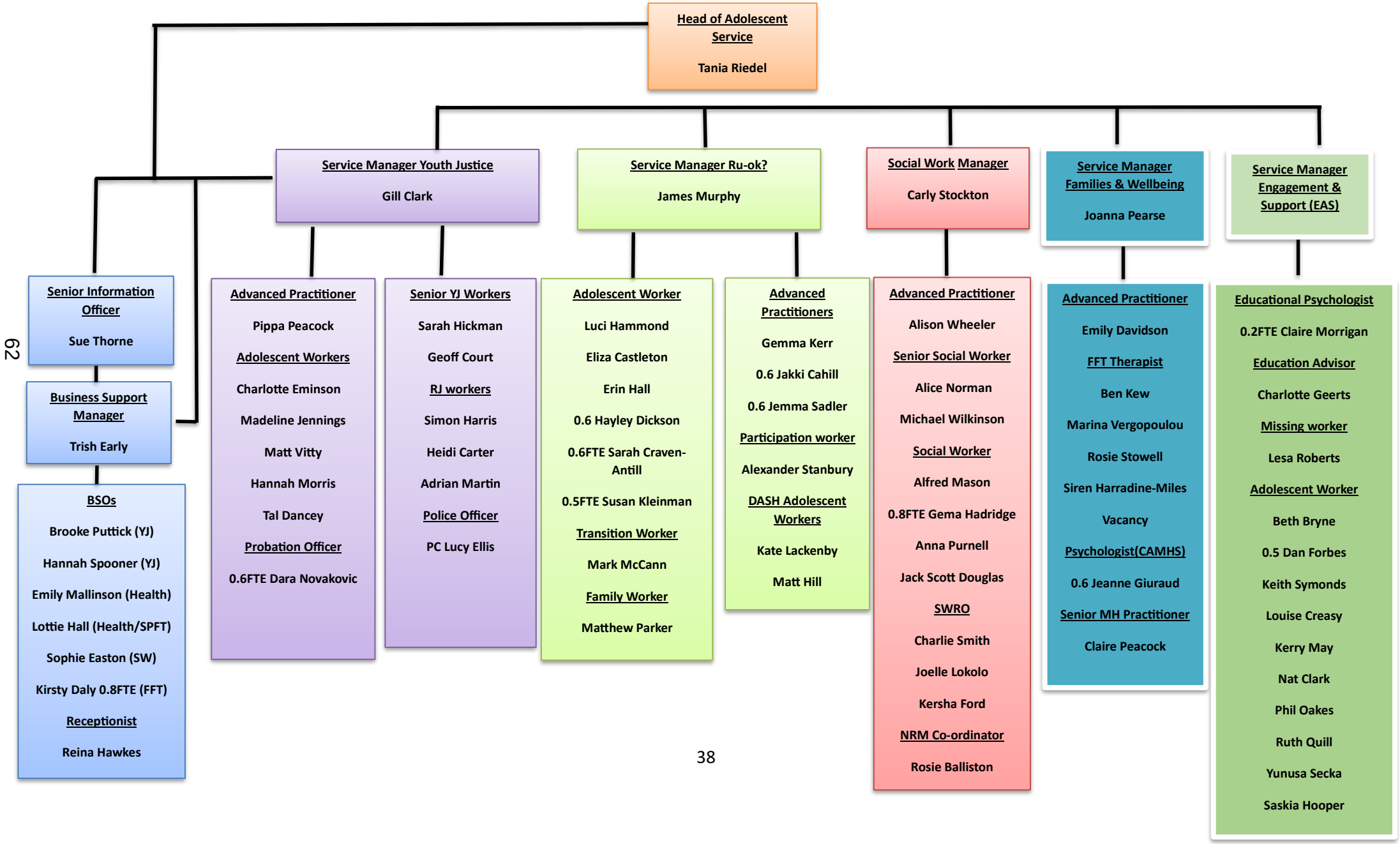
ABH- Actual Bodily Harm
AMBIT- Adaptive Mentalisation Based Integrative Treatment
AQA
ASB- Anti-social Behaviour
AVRM- Adolescent Vulnerability and Risk Meeting
B&H- Brighton & Hove
BAP- Behaviour & Attendance Partnership
BHCC- Brighton & Hove City Council
CAHMS- Child and Adolescent Mental Health Services
CiC- Child in Care
CME- Children Missing Education
CPD- Continuing professional development
CPR- Childrens Placement Team
CR- Community Resolution
CSE- Child sexual exploitation
CV- Childview
DJ- District Judge
DTO- Detention and Training Order
EAS- Engagement and Support
EDS
ETE- Education Training Employment
FCAHMS- Forensic Child and Adolescent Mental Health Services
FCW – Families, Children & Wellbeing
FDFF- Front Door For Families
FFT- Functional Family Therapy
FTE- Full Time Equivalent
GBH- Grievous Bodily Harm
HMIP- His Majesty's Inspectorate of Prisons
HMYOI- His Majesty's Young Offender Institution
HoS- Head of Service
JAG- Joint Action Group
KPI- Key Performance Indicators
LGBQT+ - Lesbian, Gay, Bisexual, Transgender, Queer or Questioning, Intersex, Asexual, and more.
MASH- Multi-Agency Safeguarding Hub
MH- Mental Health
NEET- Not in Education Employment Training
NHS- National Health Service
NRM- National Referral Mechanism
OOCR- Out of Court Disposal
OPCC- Office of the Police and Crime Commissioner
PACE- Police and Criminal Evidence
PC- Police Constable
PDP- Personal Development Planning
PiC- Partners in Change
PO- Probation Officer
PSR- Pre-Sentence Report
PTSD- Post Traumatic Stress Disorder
QA- Quality Assured
RJ- Restorative Justice
RLAA- Remand to Local Authority Accommodation
RO- Referral Order
ROTL- Release on Temporary Licence
RYDA- Remand to Youth Detention Accommodation
SAVRY- Structured Assessment of Violence Risk
SV
SW- Social Worker
TDC- Trust for Developing Communities (
VR- Virtual Reality
VRP- Violence Reduction Partnership
YC- Youth Caution
YCC- Youth Conditional Caution
YCS- Youth Custody Service
YES- Youth Employability Service
YJAF- Youth Justice Application Framework
YJS- Youth Justice Service
YOS- Youth Offending Service
YRO- Youth Rehabilitation Order

Appendix 1: Staffing Structure

BHCC Adolescent Service Staff Breakdown

Male	19
Female	51
	70
Black British	4
White British	62
African/Chinese Malay	0
Black African	1
White European	3
	70
Disability (neurodiverse)	17
Disability "other"	4
	21

Adolescent Service Structure Chart February 2024



Brighton & Hove City Council

Council Agenda Item 77

Subject: **Proposals for the future of Stanford Infant and Stanford Junior Schools**

Date of meeting: **29 January 2026**

Report of: **Corporate Director – Families, Children & Wellbeing**

Contact Officer: **Name: Richard Barker, Head of Education**
Email: Richard.Barker@brighton-hove.gov.uk

Ward(s) affected: **All**

For general release

1. Purpose of the report and policy context

1.1 This report requests Full Council approval to implement the proposed closure of Stanford Junior School and the change of age range at Stanford Infant School from 4-7 years to 4-11 years, creating a single all-through primary school operating across two sites from September 2026.

1.2 Following a public consultation (29 September to 16 November 2025), the publication of a Statutory Notice and a representation period (24 November to 21 December 2025), the Council is now required to make a decision on the proposal.

1.3 The proposal is part of steps being taken to address the combined budget deficit of £466,000 held by both schools (Infants £278k, Juniors £188k) and provide a more seamless educational journey for children. The Governing Bodies have determined that merger represents the best long-term solution for both schools.

2. Recommendations

2.1 That Full Council agrees to the discontinuation of Stanford Junior School from1 September 2026 and the prescribed alteration to Stanford Infant School to extend its age range from 4-7 years to 4-11 years, with effect from 1 September 2026, creating Stanford Primary School as an all-through primary school operating across both existing sites (Highcroft Villas, Brighton BN1 5PS and Stanford Road, Brighton BN1 5PR).

3. Context and background information

3.1 Stanford Infant School (Highcroft Villas, Brighton, BN1 5PS) and Stanford Junior School (Stanford Road, Brighton, BN1 5PR) are community primary schools serving the local area. Both schools are currently facing significant financial challenges with a combined deficit of £466,000 as of the end of the 2023/24 financial year.

3.2 In recent years approximately 90% of pupils transition from Stanford Infant School to Stanford Junior School, demonstrating the existing strong

relationship between the two schools. The proposed merger would create an all-through primary school with:

- Age range: 4 to 11 years (Reception to Year 6)
- Capacity: 564 pupils
- Published Admission Number: 60
- Two sites: Highcroft Villas (BN1 5PS) and Stanford Road (BN1 5PR)

3.3 Pupils attending Stanford Junior School at the time of closure will be offered places at the new Stanford Primary School. Offers of places on National Offer Day (16 April 2026) for those pupils moving to the Junior School will remain in place for the new school. Neither site has space for all Reception to Year 6 pupils, necessitating the continuation of the two-site model.

3.4 In order to achieve an amalgamation of the two schools a statutory process must be followed as set out in Education and Inspections Act 2006 and the School Organisation (Prescribed Alterations to Maintained Schools) (England) Regulations 2013. This has five stages:

- Stage 1: Consultation – when proposals are launched
- Stage 2: Publication of Statutory Notices
- Stage 3: Representation period of 4 weeks for further submission of comments on the proposals
- Stage 4: Decision – the Council must decide on the proposal within 2 months of the end of the representation period
- Stage 5: Implementation

3.5 The technical legal process of achieving an amalgamation involves the closure of one school and expanding the age range of the other. The decision to propose the closure of the Junior School is not a reflection of the quality of education or staff at the school, but balances the need to mitigate impacts upon the council's own finances. There are no concerns about educational provision at either school and both schools currently have interim leadership arrangements.

3.6 On 11 September 2025 the Corporate Director, Families, Children & Wellbeing, in consultation with the Lead Member for Children, Families and Youth Services authorised a consultation to be undertaken on a proposal to amalgamate Stanford Infant and Stanford Junior Schools with effect from 1 September 2026. A consultation was carried out between 29 September and 16 November 2025. There were 2 public meetings and 1 online meeting held to discuss the proposals.

3.7 On 11 November 2025, following consideration of the response to the consultation, the Corporate Director, Families, Children & Wellbeing, in consultation with the Lead Member agreed to publish a Statutory Notice to progress the proposal. This was followed by a four week representation period between 24 November 2025 and 21 December 2025. Notices were displayed at school entrances and gates, on both school websites, Council website, Your Voice portal and in The Argus. Copies of the full proposal were sent to the Governing Boards of both schools, the Anglican and Catholic dioceses, local ward members, the Member of Parliament for

Brighton Pavillion and the Department for Education (DfE). Copies of the complete proposal have been made available to anyone who requested a copy during the publication period.

3.8 The Council is the decision maker on the proposals and is now asked to make a decision on the proposed amalgamation of the two schools.

4. Analysis and consideration of alternative options

4.1 The Governing Boards of both schools conducted extensive analysis and considered several alternative options before seeking the support of the council to undertake a formal consultation on the proposed merger of the two schools.

4.2 Option 1 – Merger (recommended)
A merger would address the combined £466,000 deficit with estimated annual savings of £120,000 through the elimination of duplicate leadership positions, consolidation of administrative functions, reduction in governance costs, and economies of scale in purchasing and resource allocation. A single Headteacher and senior leadership team would replace the current dual structure and shared administrative support across both sites could be implemented.

4.3 From an educational perspective, the merger would eliminate the Year 3 transition, providing educational continuity for children from Reception through to Year 6. This would enable consistent tracking of children's progress across all primary years and better curriculum alignment.

4.4 A merger would enable pooling of educational resources and learning platform subscriptions. Staff would benefit from varied career pathways with opportunities to develop expertise across Reception to Year 6 and there could be more leadership progression opportunities and cross-phase working.

4.5 However, the merger proposal presents challenges. Staff have expressed deep concerns about job security and the inevitability of some redundancies. There is substantial anxiety about the emotional toll on staff wellbeing and the risk of losing passionate, dedicated staff who are irreplaceable to the school communities. The Council acknowledges these concerns and recognises the uncertainty this process creates for staff. Should the merger be agreed, the Council will work closely with school leaders and governors to ensure staff are properly supported throughout the transition, including access to HR support, clear communication about timescales and processes, and wherever possible, redeployment opportunities within the merged school or wider Council services.

4.6 The two schools have developed different cultures over time, and this diversity is valued by their respective communities. There is particular concern about losing the nurturing, intimate atmosphere of the Infant School and the risk that priorities might shift towards Key Stage 2 and Year 6 testing at the expense of developmentally appropriate practice for younger pupils.

Stakeholders pointed to the Davigdor merger as a cautionary example, where an outstanding infant school merged and lost its distinctive culture.

4.7 Option 2: Federation
Under a federation model, the two schools would remain as separate legal entities with their own individual budgets and separate Ofsted inspections, but would share a single Governing Board and could share a Headteacher and other staff. This option was considered but not recommended by the Governing Boards.

4.8 The primary limitation of federation is that it would not achieve the same level of financial savings as a full merger. While a federation could share some leadership costs, the schools would maintain separate budgets and remain as distinct legal entities. This significantly limits opportunities for true consolidation of administrative roles and functions. The combined deficit of £466,000 would largely remain unresolved, as the structural financial pressures would continue.

4.9 Additionally, federation creates a more complex governance and operational structure. Schools would need to maintain separate systems for finance, HR, and pupil data while trying to co-ordinate across both sites. This can create inefficiencies and additional administrative burden compared to a full merger. Some staff support federation as a lower risk first step that would allow strengthened collaboration and leadership development without the irreversibility of a full merger.

4.10 Option 3: Status Quo/Not Approving the Merger
Maintaining the current separate school structure was considered but was not considered viable due to the combined deficit of £466,000. Both schools face ongoing declining pupil numbers due to demographic changes and surplus primary places across the city. Without intervention, the financial situation would continue to deteriorate, potentially requiring more disruptive interventions in future. The status quo does not address the fundamental structural and financial challenges facing both schools.

5. Community engagement and consultation

5.1 During the consultation period (29 September to 16 November 2025) 224 portal responses plus 11 email submissions were received. Responses to the proposal were narrowly divided (45.5% oppose, 42.9% support, 11.6% unsure). The representation period following the publication of a Statutory Notice (24 November to 21 December 2025) received 12 portal responses and 14 email submissions. Of these, 85% of the responses expressed concern at the proposal for a merger of the two schools.

5.2 Both Governing Bodies submitted responses that reinforced their view that a merger of the two schools represented the best way forward educationally and financially for both schools and other responses did recognise the need for change.

5.3 Those raising concerns or objections to the proposals during the representation period highlighted in their responses concerns about the timescale of change, the lack of detailed information to support the proposal, especially in relation to financial modeling and staffing structures, the potential negative impact on Early Years education from a shift in focus to Key Stage 2, the impact on staff and a broad sense that federation would be a more appropriate first step for both schools.

5.4 The staff of Stanford Infant School submitted a formal response to the Statutory Notice in which they expressed concern that the proposed timeline of completing the merger for September 2026, is unrealistic and would "significantly increase workloads for staff at one of the busiest times of the school year leading to a risk to the quality of the education experience of the children currently attending the schools". The staff were clear to explain that the response being submitted was not a refusal to engage in a change to the schools' organisation but to challenge the reasonings outlined in favour of a merger.

5.5 Some responses referenced the potential loss of distinctive school cultures and there were concerns about the emotional toll on staff wellbeing and the risk of losing passionate, dedicated staff. It was noted that the lack of clarity about which roles would be retained created significant stress.

5.6 Many respondents questioned the forecast of financial savings, arguing that the £120,000 annual saving had not been substantiated with detailed financial modelling through the consultation period, despite efforts by the Governing Boards to respond to questions in public meetings and supply information through the consultation period.

5.7 The short recruitment window for a new Headteacher raised concerns that the school may not attract the outstanding leader needed for such a complex transition.

5.8 Additional concerns included the absence of clear leadership structure despite this being the main source of projected savings, uncertainty about SEND provision continuity and support, and concerns that neither school currently has a substantive Headteacher to lead such a complex transition. Several respondents felt that only the benefits had been emphasised while risks and challenges were downplayed.

5.9 During both the consultation period and the representation period it was explained that it was not possible to share a detailed leadership and staffing structure although it was recognised that the appointment of a Headteacher to the proposed primary school across two sites needed to come first so that they could bring their knowledge and expertise into the development of the staffing structure across both sites. Both Governing Bodies and the council remain confident that it will be possible to attract a strong list of candidates for the role and there is sufficient time to secure an appointment for the start of the new academic year.

5.10 A targeted summary from the initial consultation period is provided in

Appendix 1 and a summary of the themes raised during the representation period is provided in Appendix 5.

6. Financial implications

6.1 In proposing to amalgamate Stanford Infant School and Stanford Junior School to an all through primary school there are certain arrangements regarding the calculation of the future years' budgets, particularly the lump sum element of funding that need to be considered.

6.2 In terms of the forward calculation of a merged school budget (assuming a full amalgamation) after 1 April in any given year, the new school will receive funding equivalent to the formula funding of the closing 2 schools for the appropriate portion of the year (i.e. 7/12ths if an amalgamation takes effect from September). This means the new school will receive the full combined lump sum allocation for the 2 predecessor schools for the remainder of that financial year. From the start of the next financial year the new school will receive 85% of the total of the predecessor schools' lump sums for one financial year. This would then reduce to one lump sum allocation the year after.

6.3 Assuming the school continues to operate across the existing sites following an amalgamation it is likely that the school would qualify for a split site allocation within its annual budget. Across the 2 areas of lump sum and split site funding it is estimated that there would be a reduction in funding to the school of c. £70k per annum in the longer term.

6.4 In the event of an amalgamation that results in a school closing with a deficit budget, the expectation is that this will be a cost to the council's general fund.

Name of finance officer consulted: Steve Williams Date consulted 12/01/26

7. Legal implications

7.1 The Education and Inspections Act 2006 provides that the Local Authority is the decision maker on proposals to close or make prescribed changes to maintained community schools. A decision to amalgamate the schools must be made within 2 months of the end of the representation period, i.e. by 21 February 2026. The process by which the decision maker completes their decision making is not prescribed; however, it must have regard to the "Opening and closing maintained schools" (October 2024) and "Making significant changes ('prescribed alterations') to maintained schools" (August 2025) Statutory Guidance documents, published by the DfE.

7.2 The proposals are related, so the proposal to close Stanford Junior School must be considered and determined at the same time as the proposal to expand the age range of Stanford Infant School across both existing school sites. The Statutory Guidance sets out guidance for decision makers, and states that the decision maker should be satisfied that the proposer has carried out the requirements of the statutory process satisfactorily and

should have due regard to the responses received during the representation period. The decision maker should not simply take account of the numbers of people expressing a particular view. Instead, they should give the greatest weight to responses from those stakeholders likely to be most affected by a proposal – especially parents of children at the affected school(s).

7.3 When issuing a decision the decision-maker can:

- reject the proposal;
- approve the proposal without modification;
- approve the proposal with modifications, having consulted the LA;

approve the proposal-with or without modification- subject to certain prescribed conditions being met

Name of lawyer consulted: Bethane Harland Date consulted 14/01/26

8. Equalities implications

8.1 No Equality Impact Assessment is required at this stage as there is no disproportionate impact on pupils or families arising from the proposals, given that both schools will remain operating on both existing sites.

8.2 Should the merger proceed, an Equality Impact Assessment will be completed in relation to any HR proposals at the point that staff are formally consulted, in accordance with the Council's usual processes.

9. Sustainability implications

9.1 The merger proposals have limited direct environmental impact. The two-site model means that the school will continue to operate from the existing buildings without additional construction or major refurbishment.

10. Other Implications

10.1 **Crime & disorder implications:** The proposals are not expected to have significant crime and disorder implications. Both school sites will remain operational and the merger will not impact the schools' approach to safeguarding or their relationship with local police and community safety partners.

10.2 **Public health implications:** The proposals support public health and wellbeing by maintaining local access to primary education across two sites and supporting children's emotional wellbeing through elimination of the Year 3 transition. Careful attention will be needed during implementation to support staff wellbeing given concerns about job security and workload.

11. Conclusion

11.1 The proposal to merge Stanford Infant and Stanford Junior Schools

represents a difficult but necessary decision to address the combined deficit of £466,000 whilst ensuring educational provision for local children is able to robustly face the challenges facing the sector at this time.

11.2 The required statutory process has been completed, including public consultation and a four week Statutory Notice period. While community opinion shared during the consultation has raised concerns about the proposed option and the potential impact of the changes, the Governing Boards of both schools remain of the opinion that merger represents the best long-term solution educationally and financially for both schools.

11.3 Should the proposals be agreed, pupils offered a place at the Junior School on National Offer Day 16 April 2026 will maintain the offer of a place at the newly formed primary school.

11.4 The concerns raised during consultation and Statutory Notice periods represent implementation challenges rather than reasons to reject the proposal, and mitigation strategies have been identified to address these. The alternative options (federation and status quo) have been assessed and are not adequate to resolve the financial challenges facing both schools.

11.5 The proposal aligns with the Council's commitment to ensuring all children have access to good quality, financially sustainable education. Approval will enable implementation from September 2026.

Supporting Documentation

Appendices

Appendix 1: Summary of Consultation Phase responses
Appendix 2: Statutory Notice – Stanford Infant and Stanford Junior Schools
Appendix 3: Locations for Statutory Notice Publication
Appendix 4: Full Proposal Information
Appendix 5: Summary of Statutory Notice Period Representations
Appendix 6: Joint Governing Board Consultation Response from Governing Boards of Stanford Infant and Stanford Junior Schools
Appendix 7: Stanford Infant School staff response to Statutory Notice
Appendix 8: School Merger Consultation FAQs (produced by the Governing Boards of Stanford Infant and Stanford Junior Schools)

Stanford Infant and Junior Schools
Consultation Analysis and Recommendation

EXECUTIVE SUMMARY

Total responses: 224 survey responses plus 11 email submissions, including a collective response from the staff at Stanford Infant School and a joint Governing Board statement from Stanford Infant and Stanford Junior Governors. Consultation ran from 29th September – 16th November 2024.

Proposal: Closure of Stanford Junior School and change of age range at Stanford Infant School from 4-7 years to 4-11 years, creating a single all-through primary school on two sites from September 2026.

Rationale: No Ofsted concerns at either school. Combined deficit £466,000 (Infants £278k, Juniors £188k). Infant deficit £100k higher supports closure of Junior and age range extension. Junior PAN already set for 2026; variation would require OSA approval.

Recommendation: Proceed to Statutory Notices. Governing Bodies' extensive analysis supports merger as optimal long-term solution.

Q1: "Merging the two schools will provide a more seamless and positive educational journey for children"

Response	Count	Percentage
Disagree (Ratings 1-2)	102	45.5%
Neutral (Rating 3)	26	11.6%
Agree (Ratings 4-5)	96	42.9%

Q2: What opportunities do you think a merged school could bring for children, staff and the community?

- **Seamless Transition & Continuity:** Most frequently cited opportunity. Improved educational continuity, eliminating Year 3 transition, better curriculum alignment, consistent tracking of children's progress across primary years.
- **Financial Savings & Efficiency -** Eliminating duplicate leadership positions, consolidating administrative functions, reducing governance costs, economies of scale. Some doubts about whether savings would materialise or be absorbed by two-site costs.
- **Shared Resources & Facilities** -Pooling facilities (forest school, specialist spaces), specialist teaching staff, educational resources, learning platform subscriptions. Staff collaboration on curriculum development.
- **Career Development for Staff -** Varied career pathways, opportunities to develop expertise across Reception to Year 6, more leadership progression opportunities, cross-phase working. More prominent in parent than staff responses.
- **Community Benefits -** Simpler arrangements for families with children in different year groups, unified PTFA, strengthened community connections.

Q3: What concerns or risks do you feel need to be addressed if the schools were to merge? Do you have any suggestions for how these could be addressed?

1. Staff Concerns: Job Security, Morale, Workload - most frequent concern. Deep anxiety about job security and inevitable redundancies. Schools already short-staffed. Emotional toll on staff wellbeing. Risk of losing passionate, dedicated staff. Particular concern for non-teaching staff.

2. Impact on Children & Education - Disruption during transition, particularly Years 1-2. Loss of specialised early years focus. Risk of priorities shifting toward Year 6 SATs at expense of developmentally appropriate practice for younger pupils. Challenge to transition claims: currently 78 of 81 children (96%) transition smoothly.

3. Loss of School Identity & Culture -Two schools have different cultures - this is valuable. Infant school has nurturing, intimate atmosphere. Davigdor merger warning: outstanding infant school merged, lost distinctive culture, standards declined, Ofsted fell to Requires Improvement.

4. Communication & Transition Management - Staff felt insufficiently consulted. Calls for clear, transparent communication. Managing change requires dedicated time, support, resources. Concerns about rushed planning.

5. Two-Site Operational Challenges - How can leaders effectively serve two sites? Travel time reduces visibility. Neither site has space for all Reception - Year 6. Difficulty creating genuine cohesion when physically separated.

6. Financial Transparency Concerns - No published financial modelling comparing merger vs federation. No breakdown of £120k savings. Combined deficit £180k but savings only £120k = £60k shortfall. PE Premium loss of £16k. No Equality Impact Assessment, no governor minutes available to view since July 2024.

Q4: As the school governors work to protect the future of these schools and keep them at the heart of the community, please share what you value most about them.

1. Quality of Staff & Teaching - Most valued aspect. Dedication, skill, passion of teachers and support staff. Staff who know each child as individual, create safe learning environments. Personal relationships staff build with children and families seen as irreplaceable.

2. Community Spirit & Connections - Strong sense of community, schools as genuine community hubs. Active PTFAs vital to cohesion. Truly neighbourhood schools where children and families know each other.

3. Caring & Nurturing Environment - Warm, supportive, child-centered atmosphere. Children treated as individuals. Focus on wellbeing and emotional development alongside academic achievement. Nurturing approach creates confidence and resilience.

4. Educational Standards & Curriculum - Broad curriculum beyond literacy and numeracy including arts, music, PE, outdoor learning. Focus on developing rounded individuals. Children excited about learning.

Q5: "Do you support the proposal to merge Stanford Infant and Stanford Junior Schools into a single all-through Primary School (Reception to Year 6)"?

Response	Count	Percentage
Yes	96	42.9%
No	102	45.5%
Not sure	26	11.6%

Q6: "Please let us know in what capacity you are answering this survey”

Response	Count	Percentage
Parent/Carer	147	65.9%
School Staff	38	17%
Resident	20	8.9%
Governor	10	4.5%
Other	8	3.3%
No answer	1	0.4%

CONCLUSION AND RECOMMENDATION

Community opinion is narrowly divided (45.5% oppose, 42.9% support, 11.6% unsure). However, the Governing Bodies have determined through extensive analysis of 23 factors that merger represents the best long-term solution.

Recommendation: Proceed to Statutory Notices for closure of Stanford Junior School and change of age range at Stanford Infant School to 4-11 years from September 2026. While concerns are significant, they represent implementation challenges rather than reasons to reject the proposal. The combined £466,000 deficit is unsustainable, and the Governing Bodies' determination that merger is the optimal solution provides clear direction.

Brighton & Hove City Council
Statutory Notice: Changes to Stanford Infant and Stanford Junior Schools

Notice is given in accordance with the Education and Inspections Act 2006, ("**the Act**") as amended, that Brighton & Hove City Council, Hove Town Hall, Norton Road, Hove, East Sussex BN3 3BQ intends to make the following changes:

Part 1: Discontinuation of Stanford Junior School so that an all through primary school can be established

In accordance with section 15(1) of the Act to close Stanford Junior School, Stanford Road, Brighton, BN1 5PR from 1st September 2026.

This proposal is linked to the prescribed alteration set out in Part 2, to create an all through primary school with an extended age range of 4 to 11 (see Part 2 of this notice). Pupils attending Stanford Junior School at the time of closure will be offered places at Stanford Primary School, which, subject to Part 2, will change its age range and enlarge its capacity, becoming an all though primary school.

Part 2: Prescribed changes to Stanford Infant School so that it becomes an all through primary school operating across both existing sites: Highcroft Villas, Brighton, BN1 5PS and Stanford Road, Brighton, BN1 5PR with effect from 1st September 2026.

In accordance with section 19(1) of the Act to make a prescribed alteration to Stanford Infant School, Highcroft Villas, Brighton, BN1 5PS from 1st September 2026 by changing the age range of the school by a year or more.

The current age range of the school is 4 to 7. The Local Authority proposes to extend the age range of the school to create an all-through primary school that will cater for pupils from age 4 to age 11. The current capacity of the infant school is 180. The proposed capacity of the primary school will be 564. It is proposed that the admission number for the school will be 60. It is proposed that the increase in capacity will be achieved by utilising both existing sites.

This notice is an extract from the complete proposal. Copies of the complete proposal can be obtained from Richard Barker, Head of Education, Brighton & Hove City Council, Hove Town Hall, Norton Road, Hove, East Sussex BN3 3BQ or by contacting the Education & Learning Team via email on educationandlearning@brighton-hove.gov.uk.

The Full Proposal is also available on the Brighton & Hove City Council (School statutory notices), and both school websites: Stanford Infant School: (www.stanfordinfants.co.uk) and Stanford Junior School's website (www.stanfordjun.brighton-hove.sch.uk).

Within four weeks from the date of publication of this proposal (i.e. by 5pm on 21st December 2025), any person may object to or make comments on the proposal:

- on our online consultation portal (1) Project: Stanford Infant and Junior Schools merger proposal | Brighton & Hove City Council
- by email to educationandlearning@brighton-hove.gov.uk

- by writing to Richard Barker, Head of Education, Brighton & Hove City Council, Hove Town Hall, Norton Road, Hove, East Sussex BN3 3BQ

All statutory consultation requirements relating to these proposals have been complied with.

Signed: Deb Austin, Corporate Director, Families, Children & Wellbeing, Brighton & Hove City Council

Publication Date: 24th November 2025

FULL PROPOSAL INFORMATION FOR THE PROPOSED CHANGES TO STANFORD INFANT AND STANFORD JUNIOR SCHOOLS

1. Stanford Infant School, Highcroft Villas, Brighton, BN1 5PS and Stanford Junior School, Stanford Road, Brighton, BN1 5PR – Notices to go on all entrances to both schools and all gates into both schools.

2. Both school websites:
   Stanford Infant School: (www.stanfordinfants.co.uk) and
   Stanford Junior School's website (www.stanfordjun.brighton-hove.sch.uk).

3. The council's website:
   School statutory notices

4. Your Voice online portal:
   (1) Project: Stanford Infant and Junior Schools merger proposal | Brighton & Hove City Council

5. The Argus

FULL PROPOSAL INFORMATION FOR THE PROPOSED CHANGES TO STANFORD INFANT AND JUNIOR SCHOOLS

NAME AND ADDRESS OF THE LOCAL AUTHORITY MAKING THE PROPOSALS:

Brighton & Hove City Council
Education Service
Hove Town Hall
Norton Road
Hove
BN3 3BQ

NAME, ADDRESS AND CATEGORY OF THE SCHOOLS:

Stanford Infant School
Highcroft Villas
Brighton
BN1 5PS
Category: Mainstream community Infant School. The school serves pupils from 4-7 years of age.

Stanford Junior School
Stanford Road
Brighton
BN1 5PR
Category: Mainstream community Junior School. The school serves pupils from 7-11 years of age.

Neither school has religious character.

DESCRIPTION OF THE PROPOSAL

In accordance with the Education and Inspections Act 2006 (**"the Act"**) as amended, it is proposed by Brighton & Hove City Council, Hove Town Hall, Norton Road, Hove, BN3 3BG to make prescribed alterations to both Stanford Infant and Stanford Junior Schools.

The first proposal made by Brighton & Hove City Council is to close Stanford Junior School from 1st September 2026.

This proposal is linked to a further proposal to change the age range of Stanford Infant School from 4-7 years of age to 4-11 years of age on the same date.

These two proposals together will create an all through primary school operating across both existing sites with effect from 1st September 2026.

As these are linked proposals, we will either implement both proposals or neither proposal. There will not be an instance where one proposal would be implemented on its own.

THE OBJECTIVES OF THE PROPOSAL

Brighton & Hove is experiencing declining school enrolment across the city, which has created significant challenges for primary schools. School funding is directly linked to pupil numbers rather than providing a set amount of funding per school. This, combined with pay rises without equivalent funding increases to schools, has resulted in increasing budgetary pressures for both Stanford Infant School and Stanford Junior School.

Both schools face structural budget deficits that are not sustainable. Stanford Infant School's Published Admission Number ("**PAN**") has been reduced from 90 to 60 from

September 2025, and this reduction in pupil numbers will further impact both schools in the coming years.

The two schools operate independently with separate staff, sites and headteachers. At present, families must apply for a place at the Junior School when their child finishes Year 2, which creates uncertainty. Although approximately 90% of children move from the infant school to the junior school, the current system doesn't guarantee a place, which can be stressful for families.

The alterations will provide:

- A seamless educational journey from Reception to Year 6
- Curriculum continuity and alignment across all year groups
- Guaranteed Year 3 places for all infant pupils
- Improved support for vulnerable children and those with SEND
- Staff career development opportunities and flexibility of resources across both sites
- Financial sustainability through reduced duplication and economies of scale

It is recognised that there are benefits to having separate infant and junior schools. For example, teachers and support staff can develop strong specialist expertise in relation to the particular age range. They can focus on creating a particular environment which meets the needs of either infant or junior age children. Specialist leadership can be developed which focusses on bringing the best characteristics of infant and junior schools. For some children, a new start at 7+ may be beneficial.

However, this proposal is being considered now for reasons provided above in relation to the reduction of pupil numbers across the city, and increasing financial pressures on schools.

The legal process for achieving a single primary school in this situation requires that one school must formally close and the other must extend its age range to create the new all through primary school. However, this should in no way be seen as a "takeover" of one school by the other. It is the technical means by which a single primary school would be achieved and both schools would work together as equal partners in bringing it about.

Both Stanford Infant School and Stanford Junior School were judged to be "Good" by Ofsted in their most recent inspections in March 2022 and March 2024 respectively. It is expected that the strengths of both schools will ensure that the single primary school will be successful.

PROPOSED IMPLEMENTATION

It is intended to implement the two proposals on 1st September 2026. The new all-through primary school will operate across both existing sites, with one headteacher, one Senior Leadership Team, and one Governing Body.

Affected pupils: All pupils currently attending either Stanford Infant School or Stanford Junior School will continue their education at the single school. The alterations will create a seamless education journey from Reception to Year 6, eliminating the need for families to apply for a place at the junior school when their child finishes Year 2.

SCHOOL DETAILS, PUPIL NUMBERS AND ADMISSIONS

Stanford Infant School is a community infant school serving children in Reception to Year 2.

Address: Highcroft Villas, Brighton, BN1 5PS
Headteacher: Jenny Stratton
Current PAN: 60 (reduced from 90 in September 2025)

Stanford Junior School is a community junior school serving children in Years 3 to 6.

Address: Stanford Road, Brighton, BN1 5PR
Headteacher: Trudy Roberts
Current PAN: 96

It is expected that Stanford Infant School will change its name to reflect the change in status, this will be considered by the Governing Body.

Current pupil numbers (May 2025)

- Total Infant and Junior School capacity: **564**
- Current enrolment: 517
- Students with Education, Health and Care Plans (EHCPs): 11
- Students with SEN Support: 55

SEND Provision

Both Stanford Infant and Junior Schools are mainstream schools. There is no specific existing additional provision reserved for pupils with special educational needs and none is intended as a result of this proposal. Both schools currently provide support for children with Special Educational Needs and Disabilities. The merged school will maintain and enhance this provision, with consistent support available across the full primary age range from Reception to Year 6. Children with SEND and other additional needs will benefit from greater continuity of support throughout their primary education.

DISPLACED PUPILS

No pupils will be displaced as a result of this proposal. All current students at both schools will continue their education at the single all-through primary school across the two existing sites.

IMPACT ON STAFF

The alterations will create a unified staff team working across both sites under one leadership structure. This will provide:

- Enhanced opportunities for professional development and career progression
- Greater flexibility in deployment of staff expertise across year groups
- Improved collaboration and sharing of best practice
- More effective use of support staff across both sites
- One unified approach to policies, procedures and professional standards

Staff have and will be consulted throughout the process, and appropriate HR processes will be followed in accordance with local authority and school policies.

IMPACT ON THE COMMUNITY

There will be no adverse impact on the community. The alterations will create a stronger, more unified single school community. The benefits of this include:

- One school identity for families from Reception through to Year 6
- Simplified communication and consistent policies
- Reduced anxiety for families around Year 3 transition
- Stronger community cohesion with one Governing Body and one Parents' Association
- Maintained provision across both existing sites in the local area

TRAVEL

The alterations will not affect travel arrangements as both sites will continue to be used. Children will continue to attend the same sites as under the current arrangement, with infant aged children (4-7 years old) at the Highcroft Villas site and junior aged children (7-11 year olds) at the Stanford Road site.

EFFECT ON OTHER EDUCATIONAL INSTITUTIONS WITHIN THE AREA

The alterations are not expected to have significant impacts on other schools in the area. The merged school will maintain the same total capacity across both sites and will continue to serve the same local community.

The consultation referred to below included all schools local to Stanford Infant and Junior Schools. The consultation was brought to the attention of all schools in the city by using the Schools Bulletin. There have been no representations received from other schools to this proposal.

CONSULTATION

A comprehensive 6 week consultation was conducted from 29th September to 16th November 2025, which included:

- Face-to-face Public Consultation meetings at Stanford Infant School on 15th October 2025 and Stanford Junior School on 4th November 2025
- Online Public Consultation event on 4th November 2025
- Online survey available throughout the consultation period

A consultation document was prepared and issued on 29th September 2025. It was published online on the Council's website ((1) Project: Stanford Infant and Junior Schools merger proposal | Brighton & Hove City Council) and was circulated to the parents, staff and governors of Stanford Infant and Junior Schools and to headteachers of nearby schools. The proposal gave details of how comments could be made and the closing date of the consultation, 16th November 2025. The duration of this period of consultation was 6 weeks which included the October half-term period.

The public meeting presentation, minutes of all the public meetings and FAQ document were uploaded to Your Voice and can be accessed on this link: (1) Project: Stanford Infant and Junior Schools merger proposal | Brighton & Hove City Council)

Results from consultation responses:

Total responses: 224 survey responses, plus 11 email submissions, which included a collective response from the staff at Stanford Infant School and a joint Governing Board statement from Stanford Infant and Stanford Junior Governors.

The Governing Bodies of both schools, having carefully considered evidence including input from staff, leadership, parents/carers, pupils and the community, support the proposal to create an all-through primary school. Brighton & Hove City Council recognises that this offers the best long-term solution for maintaining educational quality while achieving financial sustainability, and their decision was to proceed with the publication of a statutory notice and full proposal for the closure of Stanford Junior School and the change of age range at Stanford Infant School from 4-7 years to 4-11 years, creating a single all-through primary school on two sites from 1st September 2026.

Brighton & Hove City Council and both school Governing Bodies are committed to:

- Maintaining and enhancing educational quality throughout the transition
- Preserving the strengths and positive cultures of both schools
- Providing comprehensive transition support for pupils, families and staff
- Ensuring transparent communication throughout the process
- Creating a unified school community while respecting the individual identities and histories of both schools.

OWNERSHIP OF SITES

- **Stanford Infant School site (Highcroft Villas):** Owned by Brighton & Hove City Council

- **Stanford Junior School site (Stanford Road):** Owned by Brighton & Hove City Council

Both sites will continue to be used by the all-through primary school.

WHERE AND WHEN THE STATUTORY NOTICE AND FULL PROPOSAL INFORMATION WILL BE AVAILABLE

Brighton & Hove City Council will publish the statutory notice for this proposal on Monday 24th November 2025. The notice will remain in force for a period of 4 weeks ie until Sunday 21st December 2025. A copy of the statutory notice is attached at **Appendix 1** to this document. Attached at **Appendix 2** is a list of the locations where the notice is posted.

On 24th November 2025 the full proposal information (this document plus appendices) will be sent to the following recipients:

- The Governing Board of the Infant and Junior Schools
- The Diocese of Chichester
- The Diocese of Arundel and Brighton
- Leader of the Council
- Local Ward Councillors
- The Member of Parliament for Brighton Pavillion
- The Governing Bodies of local secondary schools and neighbouring primary schools.

It will also be published on Brighton & Hove City Council's website (School statutory notices), and both school websites: Stanford Infant School: (www.stanfordinfants.co.uk) and Stanford Junior School's website (www.stanfordjun.brighton-hove.sch.uk).

Any person may request a copy of the full proposal information either by writing to Richard Barker, Head of Education, Brighton and Hove City Council, Education Service, Hove Town Hall, Norton Road, BN3 3BQ or via email at educationandlearning@brighton-hove.gov.uk.

How to make representation or comment on the proposal

Any person may object or make a representation or comment on the proposal either by responding by writing to Richard Barker, Head of Education, Brighton & Hove City Council, Education Service, Hove Town Hall, Norton Road, BN3 3BQ or via email at educationandlearning@brighton-hove.gov.uk.

Following the closing date for representations, comments and objections, a report will be prepared for the Cabinet to consider and determine the proposal within 2 months i.e. no later than 21st February 2026.

Support and further information

For further information about this proposal, please contact:

Richard Barker
Head of Education
Brighton & Hove City Council
Education Service
Hove Town Hall
Norton Road
Hove BN3 3BQ
Email: educationandlearning@brighton-hove.gov.uk

Stanford Infant and Junior Schools
Statutory Notice Period Representations Summary

EXECUTIVE SUMMARY

During the statutory notice period from 24th November 2025 to 21st December 2025, 26 representations were received (14 via email, 12 via Your Voice). 4 were in support of the merger and 22 opposed the merger.

Key concerns centered on requests for financial transparency, two-site operational management, staff wellbeing during transition, and support for federation as an alternative model.

However, the Governing Body has already conducted extensive analysis of federation alongside other options and determined that merger represents the optimal long-term solution for both schools.

FINANCIAL TRANSPARENCY

Multiple representations requested detailed financial modelling showing how the merger would address the £466,000 combined deficit. Respondents sought clarification on how the stated savings of £120,000 would be achieved and whether two-site operational costs had been factored into projections. Some representations called for line-by-line budget comparisons of merger versus other models.

The Governing Body has undertaken comprehensive financial analysis as part of their evaluation of 23 factors, concluding that merger provides the most sustainable financial solution. Detailed financial planning will form part of the implementation phase to ensure savings are realised and two-site costs are managed effectively.

TWO-SITE OPERATIONAL MANAGEMENT

Respondents raised questions about how school leadership would manage two separate locations effectively, including concerns about visibility, availability, and creating unified school culture across split sites. Parents noted logistical considerations around drop-off and collection arrangements.

While these operational considerations are important, they represent implementation challenges to be addressed during the transition phase rather than reasons to reject the merger proposal. Many successful primary schools operate across multiple sites, and careful planning during implementation will ensure effective leadership coverage, communication systems, and practical arrangements for families.

STAFF WELLBEING AND TRANSITION SUPPORT

Several representations expressed concern about staff facing potential changes to their roles, highlighting anxiety and uncertainty during the consultation and statutory notice periods. The representations emphasised the importance of retaining experienced, dedicated teachers and support staff, noting that both schools currently operate with some staffing pressures.

These concerns underscore the critical importance of robust transition planning that prioritises staff consultation, clear communication, and appropriate support throughout the implementation phase. Managing organisational change with care and professionalism will be essential to maintaining staff morale and retaining the skilled workforce that both schools value.

EDUCATIONAL CONTINUITY AND QUALITY

Respondents noted the current high transition rate of 90% from Stanford Infant to Stanford Junior and raised questions about how merger would improve upon this. Concerns included maintaining specialised early years expertise and the nurturing atmosphere that characterises Stanford Infant School, alongside ensuring younger children's needs are not overshadowed by Year 6 priorities. These representations highlight what the community values most about both schools.

The merger proposal aims to preserve these strengths while creating enhanced educational continuity across the full primary age range. Implementation planning will need to ensure that the distinctive qualities of both schools inform the culture and approach of the merged school.

FEDERATION AS ALTERNATIVE MODEL
Multiple representations advocated for federation as an alternative that could achieve administrative and financial efficiencies while maintaining distinct school identities.

The Governing Body has undertaken extensive analysis of federation alongside merger and other options as part of their consideration of 23 factors. Following this thorough evaluation, they have determined that federation would not provide the level of financial sustainability required to address the combined deficit, nor would it deliver the educational benefits of full integration.

The Governing Body's recommendation of merger as the optimal solution reflects their conclusion that this model best serves the long-term interests of both school communities.

GOVERNANCE AND CONSULTATION
Some representations expressed concerns about transparency in the decision-making process and consultation with staff. The collective representation from Stanford Infant School staff emphasised the importance of staff voices being heard in the process.

These concerns highlight the need for continued open communication and consultation as the proposal moves forward. The formal consultation phase, statutory notice period, and decision-making by Full Council ensure appropriate democratic oversight.

CONCLUSION
The 26 representations demonstrate continued opposition to the proposed merger and a strong preference among respondents for exploring federation as an alternative.

However, the Governing Body has already undertaken comprehensive analysis of federation alongside other options and determined that merger represents the most financially sustainable and educationally beneficial solution to address the combined £466,000 deficit.

While the representations raise legitimate concerns about financial transparency, operational management, and staff wellbeing, these largely represent implementation challenges that will require careful management during the transition phase rather than reasons to reject the merger proposal itself. These representations will be considered by Full Council alongside the consultation analysis and the Governing Body's recommendation when making the final decision.

Stanford Junior & Infant Schools

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Wednesday 13th November 2025

Dear Richard

CONSULTATION ON THE PROPOSAL TO MERGE STANFORD INFANT AND JUNIOR SCHOOLS

Joint response from the Governing Boards of the two schools

Introduction

The Governing Boards of Stanford Infant School (SIS) and Stanford Junior School (SJS) have been working together through a Joint Working Committee to explore the best structural option for the future of our schools. Both schools are rightly proud of their history, identity and achievements. However, we must also face the significant demographic and financial challenges that are affecting primary schools across Brighton & Hove and beyond.

Our focus has been on identifying a sustainable structure that protects and enhances the quality of education, supports our staff, and provides stability for children and families for years to come. Having carefully considered the evidence, and with input from staff, leadership and stakeholders, we believe that merging the two schools from September 2026 into a single all-through primary school on two sites offers the best long-term solution and as such this has been our proposal to you. We believe that by merging into one school we can remove significant duplicative work which would enable us to reduce leadership headcount, and therefore costs. We have been challenged in the consultation to consider that Federation is preferable. We still cannot see that Federation could remove the workload that merging would and therefore the necessary cuts to headcount would still take place and would leave less staff to do more work.

We are part-way through the consultation process and have held meetings with staff and with the wider public. We have listened closely to the views expressed so far and we currently remain of the view that merger is the best way forward. Both governing bodies will, however, meet after the consultation concludes to decide whether anything raised in the consultation leads us to believe that a change of approach is necessary.

This note explains the governing bodies' original proposal to merge the schools.

Qualitative Case for Merger

To measure the qualitative considerations, we undertook a multi factor analysis of 23 elements drawn from the NGA and from the experience of Hertford School, comparing merging with federating, and ran the exercise with the Governing Boards and the Leadership teams in both schools to determine the best outcome for our schools in qualitative terms. The result was that the majority believed merging was the better choice.

1. A Seamless Educational Journey for Children

- A merged school would provide a **single, coherent pathway from Reception to Year 6**, reducing disruption at the transition from Year 2 to Year 3.
- Families would benefit from the reassurance that their child has a guaranteed place in Year 3, avoiding uncertainty and anxiety at a critical stage.
- Curriculum and pedagogy could be aligned across all year groups, ensuring continuity in teaching and learning, as well as more consistent support for vulnerable children and those with additional needs.

2. Stronger and More Consistent Leadership

- A merged school would have one Head Teacher, one Senior Leadership Team and one Governing Body. This provides clarity of accountability and direction, enabling more effective strategic planning and operational delivery.
- Leadership could focus on long-term school improvement across all year groups, rather than navigating the complexities of two separate institutions.
- Professional development opportunities for staff would be broadened across a larger single organisation, helping with recruitment, retention and career progression.

3. Unified School Community

- Parents, carers and staff would be part of one school community, reducing any sense of 'them and us', strengthening collaboration and creating shared purpose.
- Children would identify as part of one larger school, fostering a stronger sense of belonging and continuity.
- Unified policies and practices would simplify matters, from communication to uniform, for families.

4. Opportunities for Enriched Curriculum and Wider Opportunities

- With one staff body, there is greater flexibility to share expertise across year groups, develop subject specialisms, and expand enrichment opportunities.
- Extracurricular activities and clubs could be better-coordinated and accessible across the full primary age range.
- Support staff can work more effectively across sites to meet children's needs.

Financial Considerations

The financial context cannot be ignored. Both schools face structural deficits that are not sustainable even in the short term. Any attempt to address this as stand-alone schools, federated or not, would be to the significant detriment of the quality of education.

- Our analysis suggests that merger will enable us to achieve the long-term budgetary improvements required to ensure a sustainable and strong future for the schools. Crucially, under merger we could achieve this by removing duplication and taking advantage of economies of scale rather than through straightforward cuts.
- A single budget and staffing structure would also allow greater flexibility in deploying resources.
- We believe under merger we would be able to return to cumulative budget surplus within the period required under our licensed deficits whilst maintaining the high-quality education delivered by both schools.

Conclusion

Our shared commitment is to ensure that Stanford Infant and Stanford Junior Schools – together as one – can continue to thrive and provide the highest quality education for local children in the years to come. We have come to the conclusion that merging schools into a single primary school is the best way forward. This proposed model:

- Provides a solid educational journey for children.
- Creates strong leadership and staff development opportunities.
- Builds a unified and resilient community.
- Offers the clearest path to financial stability and sustainability.

Yours sincerely,

(Sent by email)

Lauren Cole
Chair of Governors, Stanford Infant School

Pete Searle
Chair of Governors, Stanford Junior School

(On behalf of both Governing Boards)

Consultation Phase Representation from members of staff at Stanford Infant School

Members of staff at Stanford Infant School are writing to formally respond to the proposed merger with Stanford Junior School. Whilst we acknowledge the intention behind the proposal and understand the potential benefits being considered, we have significant concerns and unanswered questions regarding its implications for staff, children and the broader school community. This letter outlines our collective reflections, key areas of concern, and specific areas that we believe must be addressed before any further steps are taken.

It is important to emphasise that this letter, contributed to by experienced and dedicated members of staff at the infant school, acts not as a refusal to engage in the proposed changes or with our colleagues at the junior school, but to challenge the reasonings outlined in favour of a merger, rather than federation or the exploration of other options. We feel strongly that closer collaboration is important, we value and welcome the opportunity to work with our colleagues at Stanford Juniors and know that things cannot continue as they are due to budget constraints.

The following response outlines the main concerns;

- The current timeline and clarity of proposed changes
- The impact of a merger on current workload
- Lack of financial clarity around the benefits and savings achieved by a merger in comparison with federation
- Strategic decisions being made without full consideration of operational impact on the educational experience of the children and their families
- Justification of merger over federation

A Seamless Education Journey for Children

A merged school would provide a single, coherent pathway from Reception to Year 6, reducing disruption at the transition from Year 2 to Year 3.

It is unlikely that the merger will reduce the disruption at the transition from Year 2 to Year 3 as suggested. Currently, the natural break at the end of Year 2 offers families the flexibility to move children to a junior school of their choice, with the vast majority opting for Stanford Junior School (in 2025, 78 children out of a possible 81 attended Stanford Junior School). This break often means that families who may have moved out of the area during their child's time at Stanford Infant School, choose to keep their child at the infants until Year 2 ends, avoiding the need for an in-year transfer. If the schools were merged, this natural break would be lost and these children could potentially leave earlier, leading to increased turnover and lower student numbers.

Additionally, it is unclear what specific disruption exists between Year 2 and Year 3 and how this would be alleviated by a merger. While some children may find the transition between Infants and Juniors (building to building) difficult, this will remain the case as long as the schools remain on separate sites. There are already frequent visits during the transition time and this could be extended to earlier in the year as has historically been the case.

Families would not have to apply for a place in Year 3, avoiding uncertainty and anxiety and a critical stage.

Families are currently only required to fill in a single application form (approximately two pages) via Brighton and Hove School Admissions to apply for a Year 3 place. All children in Year 2 at Stanford Infants are guaranteed a place at Stanford Juniors as we have a formal link between both schools.
Unfortunately, the slides shared at the public consultation meetings state that children moving from Year 2 to Year 3 are not currently guaranteed a place at Stanford Juniors - this is incorrect as the only reason for children not getting a place is if parents do not apply. We feel this is misinformation and should be clarified. There is no uncertainty amongst families once they have completed the form and the infant school ensures that all families are aware of the application process. For example, regular notices in the Newsletter, separate School Ping communication to Year 2 families, discussions with our EAL (English as an Additional Language) families at Coffee Morning events hosted by the Deputy Head and representatives from EALTs (English as an Additional Language and Traveller Service).

Curriculum and pedagogy could be aligned across all year groups, ensuring continuity in teaching and learning

This could be achieved through a range of scenarios; a merger would not achieve this on its own. There are some subjects that would benefit from following the same scheme throughout EYFS and Key Stage 1 into Key Stage 2; however decisions need to be made thoughtfully. Some schemes that we follow are embedded into the age-specific pedagogy of the infants and there is a deep worry that these may be lost. Subject leaders from both schools have met in the past to discuss progression and alignment, this is not reliant on a merger and will continue regardless.

Merging the schools is also likely to bring other linked risks to curriculum provision. As an example, due to the current allocation of PE and Sport funding being a lump sum with additional funds being allocated for children in Years 1 to 6, the removal of one of the lump sums (currently £16,000) would significantly reduce the funding available and this will have a direct effect on attainment and resources. This includes things like Forest School which may not be able to continue in the same way.

Vulnerable children and children with SEND and other additional needs would receive more consistent support through their primary school education.

An enhanced transition support programme already takes place to ensure a smooth transition for vulnerable children and children with SEND from one school to another. Both SENDCos work together alongside SLT, teaching staff in Year 2 and Year 3 as well as children and families to ensure a detailed handover of information and individual bespoke preparation with children. INAs from both schools already undertake visits to both sites prior to transitions; visits from

INAs and teachers then continue into the Autumn term to further support settling. At the public consultation meetings the possible staffing arrangements of the SENDCo role has been discussed and governors have stated that they don't expect this to change too much from the structure currently in place. If this is the case, then how will the support in a merged school become *more* consistent? Yes, support staff could move with individual children under merger but this could also happen under federation. Equally, it should be noted that it is not always beneficial for the same member of staff to support a child for the entirety of their primary education, changes in staffing will happen for a variety of reasons and changes are already and would be supported.

But, has the increase in the number of children on the SEND register if the schools merge been taken into consideration with regards to the workload and therefore, the impact this may have on the support offered to the children and families? More children, less staff/capacity and a split site could mean increased workload and ultimately, a failure to meet the needs of the children.

Unified Leadership

A merged school would have one Head Teacher, one Senior Leadership Team and one Governing Body. This provides clarity of accountability and direction, enabling more effective strategic planning and operational delivery.

The scope of hard-federation and merger seem to be fairly similar for leadership; therefore, this could be achieved through either federation or merger. Use of the same policies, training being given etc. It is very unclear what is meant by 'unified leadership' as no models have been put forward. Federating the schools first would allow different models to be explored and a best fit established for the school. During public and staff consultation meetings, the governors have stated that they don't expect the leadership structure below the head teacher to be that different to what is currently in place. If this is the case, then the only change will be having one head teacher, however we know from the Governor FAQs document that there will most likely be other job losses and changes. The uncertainty that this is causing among staff is proving heavy and morale is already suffering. While there is an understanding that a merged school could offer more progression opportunities, real evidence shows that mergers also perpetuate stress, low morale and high staff turnover.

Leadership could focus on long-term school improvement across all year groups, rather than navigating the complexities of two separate institutions.

This is difficult to fully comment on without seeing versions of staffing structures under both Hard-Federation and Merger. It was our understanding from earlier discussions that there were a wide range of things which could be achieved through federation; whilst we fully appreciate that 'one school' would have one set of policies and procedures, is this not possible under federation? In previous discussions, it was mentioned that an executive head teacher could lead across federated schools as other schools in Brighton and Hove have done with shared policies and procedures. Incidentally, the possibility of sharing leadership across schools was also discussed at a council wide meeting in 2024; where it was

mentioned that this would decrease workload by increasing shared practice. Local models of successfully merged Primary Schools have followed a period of federation where schools began on separate sites.

Professional development opportunities for staff would be broadened across a larger single organisation, helping with recruitment, retention and career progression.

Both schools are successful schools with highly committed and dedicated staff; at the Infants we have historically had a low staff turnover — this has developed a highly committed staff who work well together towards shared goals.
Long-standing members of staff are experts in their fields with an incredible passion for their roles and achieving the very best outcomes for the children they teach. While we agree that a merged school could provide some opportunities for career progression, our current expertise could be impacted by the possibility of being asked to move around sites etc.

Unified School Community

Parents, carers and staff would be part of one school community, reducing the sense of two separate schools, strengthening collaboration and creating shared purpose.

It is unclear how this could be achieved differently to what we are doing now and could do under federation. Seeing as we will still be on two sites, there will be various things which will always lend themselves to being concentrated for either the 'Infants' or the 'Juniors'.

Some events are targeted more towards younger children (film nights which are suitable for Early Years may not appeal to Key Stage 2) so the divide will inevitably continue to an extent. Other elements of unification could be explored through federation, this option would allow us to ascertain which things our school community (children, families, staff, governors) feel are important and to then work through these, instead of it being a blanket decision. One size does not fit all and is not always appropriate for all.

Children would identify as part of one larger school, fostering a stronger sense of belonging and continuity.

Federating could also foster this feeling however, in both scenarios it is likely that the children will still see themselves as being part of the 'infant' school and 'junior' school all the while the sites remain separate. Questions continue to arise from an operational point of view about day-to-day activities in school such as assemblies, golden choices/ reward time etc. Currently, the infant school offers a broad selection of enrichment activities on a Friday morning (Golden Choices) and it is an opportunity for all of the children to mix in groups across the school with different members of staff. How would this work across two sites? Whilst these things may seem minor in the grand scheme of things, it is just one small example of the operational matters that staff feel uncertain about.

Unified policies and practices would simplify matters, from communication to uniform, for families.

Both schools use the same school-to-parent systems (School Ping and Classlist) which ensures families have continuity. As well as the same Management Information System (MIS).

School policies, uniforms and other means of communication such as websites, letters etc. could all be unified as part of a federation, a merger would not be necessary in order to implement things like a joint newsletter, as an example, as we could work in closer collaboration across the schools to ensure the success.
Both schools had the same uniform logo and supplier until a few years ago, this could easily be revisited.

Opportunities for Enriched Curriculum and Wider Opportunities

With one staff body, there is greater flexibility to share expertise across year groups, develop subject specialisms and expand enrichment opportunities.

Closer working is already beginning to take place with staff collaborating at joint staff meetings, this would continue to happen if the two schools were federated. There is nothing more that could be gained from the merger that couldn't be gained from federating. As a staff team we look forward to the prospect of closer working with our colleagues at the junior school.

Extracurricular activities and clubs could be better coordinated and accessible across the full primary age range.

There are questions about the logistics of this, with there being two sites, limited space etc. A merger does not better coordinate activity clubs and there would be various Health and Safety issues regarding the suitability of clubs which are accessible across the Primary range. Capacity of the after school activities would remain the same due to ratios.

It should be noted that there is only one opportunity offered to single schools to be part of events such as the children's parade and Let's Dance at the Dome.
This means that under merger, children will only get one chance to take part in these amazing events instead of the two opportunities they receive now.

Support staff can work more effectively across sites to meet children's needs.

Many of the team are concerned about what this would mean for their roles within the school. We expect that new job descriptions would be issued, perhaps even new contracts but there is a lot of uncertainty. We feel there is a lack of recognition of the need for job stability and the potential anxiety that could be caused if staff members are expected to arrive at school in the morning essentially not knowing where they will be working/ who they will be working with. This is then likely to lead to less impactful support as staff will be less aware of individuals and needs (at the moment, support staff have a detailed knowledge of the children they support and this in turn means they have a meaningful impact on their education and well-being).

During public and staff consultation meetings, it has been stated that this is tied in with job cuts linked to 'the path of stability' and that £40,000 is expected to be saved through cutting roles such as HLTAs. As such, it seems that this is more a case of our hugely stretched support staff team being stretched more thinly across two sites, to cover the job roles that have been cut. We fail to see how this will benefit the children in any form.

A Clear Path to financial stability and sustainability

Brighton & Hove is experiencing declining school enrolment across the city, which has created significant challenges for schools of primary aged pupils. Both Stanford Infant School and Stanford Junior School face structural budget deficits that are not sustainable.

School funding is directly linked to pupil numbers rather than providing a set amount per school. This and largely unfunded government driven staff pay rises have resulted in increasing budgetary pressures for both schools. Stanford Infant School's PAN has been reduced from 90 to 60 from September 2025 and this reduction in pupil numbers will further impact both schools in the coming years.

Merger would enable the school's leadership to reduce unnecessary costs by cutting out duplication and taking advantage of economies of scale. A merged school would have one governing body, one staff team, one set of policies, one relationship with BHCC, one admissions process, one inspection programme with Ofsted.

It is likely that the projected reductions in senior leadership and other areas could increase demands on teaching staff. There are concerns about the increased workload for teaching staff if they are expected to oversee a curriculum area over Early Years, Key Stage 1 and Key Stage 2. It has been stated that the senior leadership workload will be reduced but the implications of the reduction of staff has not been explored for the rest of the staff. If staff are reduced the work still has to be done by those who remain, staff who are already overworked, overwhelmed and overstretched. Teaching staff work many hours over those that they are paid to work.

Merging could lead to increased bureaucracy and slower decision-making.

With this in mind, has the 'clear path' been properly mapped, including all expenses that will not change (utilities for both buildings, resources, repairs etc) as well as the potential cost of staff redundancies? It feels very short-sighted to say that merging the schools will decrease the workload. When this has been discussed at consultation meetings, the governors have admitted that this is mainly less work for leadership and administration. However, both of these areas will be experiencing substantial cuts - from two head teachers to one, and a predicted £40,000 in administration staff cuts. The workload in these areas does not halve; the people do. It feels mis-informed to say that workload will not increase for the whole staff team when the necessary work will be displaced downwards. It is not possible to comment on future workload as no operational detail has been considered.

In relation to this, the time frame of the merger seems unusually compressed, and the governors have admitted in their FAQ document and in public consultation meetings that there would be a lot of work to do in a short space of time to prepare for the change, should the Local Authority decide to proceed with the merger in February. This will most definitely increase the workload for staff, particularly leadership and admin as there will be a number of things that must be in place prior to September. This issue has been raised at consultation meetings and whilst we appreciate that there are things such as merging the two websites, policies etc. that can be done over a longer time frame, we don't believe this lends itself to a successful merger. For example, we must consider how this will look to prospective families in the Autumn term, when it is vital that the school is positively marketed.

Any unification of the schools should be done in a positive and impactful way; current parents and carers should be able to access their child's school information with ease. The merging of Management Information Systems, parent-to-school communication apps, learning resource apps etc. will be time consuming but necessary tasks. We are concerned that things such as remaining on two separate websites with re-direction, does not project a unified organisation. A lot of this will need to happen during the Summer term, arguably one of the busiest, with the new Reception intake, Year 2 to 3 transition and Year 6 to secondary school transition taking place, financial end of year close down and budgeting. Not to mention all of the extra curricular events and enrichments that enhance the children's learning experience.

The governors have referenced throughout their FAQ document that the only thing which will really save money is having less staff ('deeply uncomfortable cuts') which is understandably creating anxiety among the team who are also being impacted by a PAN reduction. Restructuring will only create a higher staff turnover in experienced members of staff; considering the issues which are faced daily with low staff numbers and high need in children, this does not really benefit anyone, including the children and families, who will be left with fewer, less experienced people available.

The governor FAQ document refers to a governor that was a Head Teacher at two Brighton and Hove schools that merged with their linked junior schools to create a primary school. At the penultimate consultation meeting, this particular governor was able to provide more context to this statement. They explained how they felt that the merger of Davigdor and Somerhill to Brunswick Primary did not go as hoped and there is a feeling among the governors that they can learn from those mistakes. If we are to reflect on this example of a merger locally, then it is worth noting that Davigdor was an outstanding infant school that received recognition for its pioneering early-years practice. Once merged, the distinctive culture that had been nurtured over decades was lost. Standards and morale declined and the Ofsted rating fell to 'Requires Improvement'. This is a genuine concern among infant school staff in relation to our own proposed merger. Within the other stakeholders of the schools there are people who have been through the process of federation and merger, and these experiences and expertise should also be fully explored.

In addition, it is worth noting that following the announcement of the proposed merger several days before our first Prospective Parents' open day, a number of families cancelled their visits and did not rebook. It raises questions as to how this is impacting prospective families considering us for September 2026. How can parents be expected to choose us when the future of the school is uncertain?

On 31st March the staff of both schools were asked to complete a survey created by the governors regarding 'closer working' between the schools, and were asked to comment on this, not on a merger. Therefore, the comment within the FAQ document that 83% of the community agreed to closer working means just that, it does not accurately reflect people's feelings about merging the schools. The staff were led to believe at a meeting in July that the governors were looking at federation as an option and were only told at the INSET day in September that this was now off the table and the only option being pursued was the merger. We feel that the risks of merger and the advantages of federation have not been fully explored and explained to stakeholders, despite continuous questioning at public meetings.

It is important to emphasise that this letter, contributed to by experienced and dedicated members of staff at the infant school, acts not as a refusal to engage in the proposed changes or with our colleagues at the junior school, but to challenge the reasonings outlined in favour of a merger, rather than federation or the exploration of other options. We feel strongly that closer collaboration is important, we value and welcome the opportunity to work with our colleagues at Stanford Juniors and know that things cannot continue as they are due to budget constraints.

Overall, we feel it is deeply concerning that staff, parents, and the wider community have not been provided with the full breadth of information needed to make a truly informed decision regarding the proposed merger. We know this has been expressed by staff and families alike at public consultation meetings. The communication so far appears to focus solely on the perceived benefits, while offering little to no detail about the potential risks or challenges of a merger. Without a balanced and transparent presentation of all relevant information, it is unreasonable to expect stakeholders to give meaningful feedback or support such a significant change.

Yours sincerely, staff at Stanford Infants

Statutory Notice Representation from members of staff at Stanford Infant School

For the attention of Brighton and Hove Council Cabinet members and the School Organisation Team,

Please accept the following as the formal response from members of staff at Stanford Infant School to the proposal to merge Stanford Infant and Junior Schools from September 2026.

We have serious concerns about the proposal and its timescales; whilst also fully understanding and appreciating the need for change to ensure the future of a strong educational provision for the Stanford community. We are concerned that the current proposal to merge the schools across the existing sites from September 2026 will negatively impact the outcomes and experiences of the children and families currently attending the school as the evidence for merger lacks clarity and feels rushed for a process that requires time and care in its planning and execution, given that merger is an irreversible change for the schools.

Below are the main concerns from members of staff at Stanford Infant School about the proposed merger of Stanford Infant and Junior Schools.

Concerns:

1. The **lack and clarity of any financial modelling** to show that merger is the 'best' option for future proofing a local school for the Stanford community. There have been vague figures shared of potential savings but we feel that these have not been clearly evidenced or substantiated. Beyond the savings achieved through a reduction in administration staff, the reduction of two headteacher salaries to one headteacher salary and combining payments for 'systems' (all of which there is scope to do under a federation model) there has been no other evidence of how the further savings needed will be achieved. The Infant School is already going through a PAN reduction period and cutting staffing each year.

2. Linked to this is also a concern that, as yet there is **no clear leadership structure** being proposed or shared with school staff and the community, despite this being the main source of financial savings achieved under merger. At the very least a strategic plan needs to be made so that it's operational viability can be considered before irreversible decisions are made. In addition, we are yet to be convinced that staff workloads won't be impacted and increased in the lead up to and following the merger, as the main driver for the merger is to reduce financial costs; the bulk of which will by necessity come from reductions in staffing. And that these reductions will need to come from non-teaching roles – such as leadership and admin roles.

3. Both of the above concerns also lead to a further concern about the **lack of consideration of federation as an option;** particularly as the proposed merger is that the school will retain both sites. Other schools in the city who have been in similar positions have federated initially with some, but not all then going on to merge. There has been no clear justification or explanation to the community about why federation has not been considered an option. Where is the clear financial and., or other evidence that federation is less favourable than merger?
   On 31st March 2025 the staff of both schools were asked to complete a survey created by the governors regarding 'closer working' between the schools, and were asked to comment on this, *not* on a merger. Therefore, the comment within the FAQ document, to support the initial consultation, that 83% of the community agreed to closer working means just that; it does not accurately reflect people's feelings about merging the schools. The staff were led to believe at a meeting in July 2025 that the governors were looking at federation as an option and were only told at the start of September 2025 that this was now off the table and the only option being pursued was a merger. We feel strongly, that the risks of merger and the advantages of federation have not been fully explored, evidenced and explained to stakeholders, despite continuous questioning at the public meetings.

4. The proposed **timeline of completing the merger for September 2026, is unrealistic** from an operational perspective as even at a very basic level it will significantly increase workloads for staff at one of the busiest times of the school year. Leading to a risk to the quality of the education experience of the children currently attending the schools - financial end of year close down and budgeting, end of year report writing, end of year assessments, data collections, end of year celebrations and leavers' shows for Y2 and Y6, transition meetings for all year groups and transition support for incoming Reception children as well as Y6-Y7 transition work as well as all of the extracurricular events and enrichments that are important and essential enhancing aspects of a child's school journey and learning experience.

5. As the staff at the Infant School, who all share a passion and commitment to importance of **prioritising high quality Early Years provision** to ensure the best outcomes for children and their futures. We have significant concerns that this priority and the excellence currently provided **will be lost in a merged primary school that continues to operate on two sites.**
   The governor FAQ document shared as part of the proposal to merge consultation, referred to a governor who had been a Head Teacher at two Brighton and Hove schools that merged with their linked junior schools to create primary schools. At the penultimate consultation meeting, this particular governor was able to provide more context to this statement. They explained how they felt that the merger of Davigdor Infant School and Somerhill Junior School into Brunswick Primary did not go as hoped and there was a feeling among the governors that they can learn from those mistakes. If we are to reflect on this example of a merger locally, then it is worth noting that Davigdor was an outstanding Infant school that received recognition for its pioneering early-years practice. Once merged, the distinctive culture that had been nurtured over decades was lost. Standards and morale declined and the Ofsted rating fell to 'Requires Improvement'. As highlighted above, this is a genuine concern our school staff in relation to our own proposed merger.

Overall, we feel it is deeply concerning that parents, staff and the wider community have not been provided with the full breadth of information needed to make a truly informed response regarding the proposed merger. This was expressed by staff and families alike at the public consultation meetings as part of the initial proposal to consult. However, the only communications shared focused solely on the perceived benefits, while offering little to no detail about the potential risks or challenges of a merger. Without a balanced and transparent presentation of all relevant information, it is unreasonable to expect stakeholders to be able to give meaningful feedback or trust in and support such a significant change.

Finally, we would like to, once again, emphasise that this response, as with the one to the initial consultation, has been contributed to by experienced and dedicated members of staff at the Infant school, acts not as a refusal to engage in a change to the schools' organisation or with our colleagues at the Junior school, but to challenge the reasonings outlined in favour of a merger, rather than federation or the exploration of other options. We feel strongly that closer collaboration is important, we value and welcome the opportunity to work with our colleagues at Stanford Junior School and know that things cannot continue as they are due to budget constraints. That said we also want the best educational experiences and outcomes for the children in our care and any changes proposed should not compromise this for the children currently attending the schools for the benefit of future children.

We would ask that the council cabinet seriously consider whether the proposed merger has been fully and robustly evidenced as the best option for the future of our community schools at this point in time. Alongside giving consideration, in light of the experiences of other schools within the city, whether other options should be explored further first. For example, whether a period of federation before a reconsideration of merger at a later date would be more robust in securing stronger financial stability for the schools whilst maintaining the quality of provision,

outcomes and education experience for the children, and families, attending the schools now as well as in the future.

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Stanford Junior and Stanford Infant School Merger Consultation

Governors' FAQs October 2025

The Proposal

1. Why do the Governing Boards want to merge the schools?

The Governing Boards of Stanford Infant School and Stanford Junior School have been working together to explore the best structural option for the future of our schools. Both schools are rightly proud of their history, identity and achievements. However, we must also face the significant demographic and financial challenges that are affecting schools of primary aged pupils. The focus for Governors has been on identifying a sustainable structure that protects and enhances the quality of education, supports our staff, and provides stability for children and families for years to come. Having carefully considered the evidence, including input through focus groups and a community survey from staff, leadership and parents/carers, we believe that merging the two schools from September 2026 into a single all-through primary school on two sites offers the best long-term solution.

There are many successful through primary schools. In Brighton & Hove there are 43 primary schools, compared to just 5 separate infant schools, 2 of which are federated. All of the other infant schools in Brighton & Hove are bigger than Stanford Infant School. Small schools can be challenging to manage because of high staff costs relative to pupil numbers (particularly in infant schools, given the legal cap on infant class sizes). We also believe that small schools with falling pupil numbers are more at risk of mandated re-organisation by the Local Authority than larger schools. We want the Governors of the schools, who care deeply about the schools, and understand the local context personally, to develop proposals for change, not the Local Authority. We have been told by the Local Authority that no change is not an option, in light of the schools' financial positions. This is the background to the proposal to merge the schools.

2. What research have the Governing Boards undertaken to get to this proposal?

The two Boards of Governors, involving the participation of 23 Governors, have given very extensive and careful consideration to our merger proposal. We acknowledge that in any major change process, there are risks. We believe we have considered these in detail and would put every measure in place to minimise them. This would ensure the highest quality educational experience for all children to achieve their fullest personal and learning potential.

We have spent time with Head Teachers and Chairs of Governors from Hertford Primary, Hangelton Primary and Benfield Primary plus The Hove Learning Federation discussing their experience of federation, merger and academisation and taking their learning into consideration in our plans.

Following a year of initial work between the schools on collaboration, we set up a joint working committee with representatives from both schools' boards and with Terms of Reference relating to creating closer working in a broad sense. We then arranged for an Associate Governor from each school to be invited to attend the Governance meetings of the other school each half term to increase collaboration.

During April of 2024, the Joint Working Committee ran a survey of the school community to find out what the views of closer collaboration between the schools were. The results of the survey showed 83% of the community either agreed or strongly agreed that 'closer working between the schools is a positive move'.

During the process of analysing the range of options available to the school, namely doing nothing, federating, merging or academizing, in addition to the quantitative financial analysis, we also undertook a considerable qualitative review of the options. We ruled out doing nothing as it is clear that is not a viable option. We also determined that academisation would not be a workable solution for the schools. We then developed a multi-criteria decision analysis using information from the National Governance Association and input from the Hertford School merger to compile 23 factors relevant for the performance of a school which looked to rate the outcomes of federation and merger. The Governing Boards and the School leaders assessed the factors and largely found the merger to deliver better outcomes.

One of our Governors was the headteacher at two Brighton & Hove infant schools which merged with their linked junior school to create a primary school. He has shared his learning from these processes about how to make sure a school merger is successful. This learning is reflected in this paper in the Governors' proposals to address risks. We have reflected on the learning from this, and the Governors will prioritise efforts to maximise the educational success of our merger in consideration of what has been shared.

3. Who are the Governing Boards?

The governors are a diverse group, including staff Governors from both schools, civil servants, teachers and head teachers from other establishments, lawyers, economists, accountants, HR professionals, recruiters, marketers and communications professionals, psychologists, television producers and people working in the creative industries. Between the two Governing boards at the Infant School and Junior School, there are 26 people comprised of:

- 7 Parent Governors (elected by parents & carers) – parents with children at the school who understand first-hand what matters to families here
- 9 Co-opted Governors – people from the local community or with children at the school, appointed for their specific skills and expertise
- 2 Local Authority Governors, appointed by the LA for their skills and expertise and acting as a bridge between the Governing boards and the LA
- 2 Staff Governors – elected by the school staff
- 2 Head Teachers – who are automatically part of each governing body
- 2 Associate Members – who bring additional expertise (one of the Governors from each board attends the other Board's meetings).
- 2 Clerks – paid employees who run the administration and procedures of the Boards.

The Boards meet twice each term as well as regular communication around priorities and are tasked with:

- Ensuring clarity of vision, ethos, and strategic direction.
- Holding executive leaders to account for the educational performance of the organisation and its pupils, and the effective and efficient performance management of staff; and
- Overseeing the financial performance of the organisation and making sure its money is well spent.

4. What are the benefits of merging?

1. A Seamless Educational Journey for Children

- A merged school would provide a single, coherent pathway from Reception to Year 6, reducing disruption at the transition from Year 2 to Year 3. Under this proposal families would not have to apply for a place in Year 3, avoiding the uncertainty of a decision for some and additional bureaucracy for others at this point.

  The Governors are not aware of any clear, statistically significant, evidence that infant/junior school structures are any better for pupil attainment than through primary schools, particularly where there is good management in place. We are aware of qualitative evidence that transitions between educational settings can be difficult for children, but clearly these can be experienced within an infant / junior structure too. The teams already work hard and successfully on this and we have had positive feedback from parents. Our comments about reducing disruption and improving coherence from Reception to Year 6 are primarily practical and qualitative. We believe many (but not all) parents and pupils would appreciate not having to make a separate application for Year 3, their child having a familiar headteacher in Year 3, and there being a feeling of one school, for example. The Local Authority is testing that statement with the community in the current consultation.

- Curriculum and pedagogy could be aligned across all year groups, ensuring continuity in teaching and learning.
- Vulnerable children and children with SEND and other additional needs would receive more consistent support through their primary school education.

2. Unified Leadership

- A merged school would have one Head Teacher, one Senior Leadership Team and one Governing Board. This provides clarity of accountability, vision and direction, enabling more effective strategic planning and operational delivery.
- Leadership could focus on long-term school improvement across all year groups, rather than navigating the complexities of two separate institutions.
- Professional development opportunities for staff would be broadened across a larger single organisation, helping with recruitment, retention and career progression.

3. **Unified School Community**
    - Parents, carers and staff would be part of one school community, reducing the sense of two separate schools, strengthening collaboration and creating shared purpose.
    - Children would identify as part of one larger school, fostering a stronger sense of belonging and continuity.
    - Unified policies and practices would simplify matters, from communication to uniform, for families.

4. **Opportunities for Enriched Curriculum and Wider Opportunities**
    - With one staff body, there is greater flexibility to share expertise across year groups, develop subject specialisms, and expand enrichment opportunities.
    - Extracurricular activities and clubs could be better coordinated and accessible.

5. What is the state of each school's budget now?

Very challenging. The budgetary position is very similar in the two schools. The Infants has an in-year deficit of £105,000 in 2025/26 and a cumulative deficit of £280,000. The comparable figures for the Juniors are £75,000 and £215,000. The combined cumulative deficit is just below £500,000. To be clear, the money provided by the government to fund the Infant School no longer covers 100% of staff salaries (which are set centrally, and therefore outside of the school's control). All enrichment currently provided by the Infant School is funded by the PTFA and other parental donations.

The Infant School is projected to move to small in-year surpluses from 2026/27 but these would do little to dent its cumulative deficit. If the Juniors took some difficult but achievable savings measures it could significantly reduce but not eradicate its in-year deficit and its cumulative deficit would grow.

Brighton & Hove City Council (BHCC) require schools to achieve cumulative balance within 5 years. As stand-alone schools, without economies of scale, the schools could only achieve this by making deeply unattractive and harmful cuts. These would put considerable extra strain on already hard-pressed staff and detract from the quality of education, particularly for vulnerable children and children with extra needs. The Governing Boards believe this situation presents a serious threat to the long-term sustainability of high-quality primary education in the local community, which is why they are exploring the option of merging — as a positive and proactive solution.

6. Are other schools in Brighton & Hove in the same situation?

Yes, there are many schools across the city in a similar situation. The reasons explained in the next question are common among local schools.

7. Why are the Schools' budgets in such a challenging position?

Like many schools across the city and the country, both Stanford Infant and Stanford Junior Schools are facing significant financial pressures. These challenges are due to a combination of long-term factors:

- **Funding pressures**: School budgets have not kept pace with the rising costs of running schools, including staffing, energy, and other essentials.
- **Falling pupil numbers**: There are fewer primary-aged children in the local area than there were a few years ago, which means smaller class sizes and less funding overall (since school budgets are largely based on pupil numbers).
- **Limited opportunities for efficiencies**: As relatively small stand-alone schools, it is difficult to achieve the economies of scale that larger or combined schools can benefit from.

8. How would a merger make the schools' finances better?

To estimate the financial impact of merger and other options we looked at the effect we might expect the change to have on funding, on senior staffing needs and on cross-school support. We did this in discussion with the schools' senior leaders. We sense-checked our findings with senior BHCC experts.

We found that merger has the potential to deliver the budgetary improvement the schools need by cutting out duplication and economies of scale. This would enable us to reduce costs without placing extra demands on hard-pressed staff.

Under merger we would become one school and have:

- **One Head Teacher**
- **One set of Governors and Governor meetings**
- **One Senior Leadership team**
- **One staff body**
- **One relationship with BHCC and other local partners**
- **One relationship with Ofsted**
- **One set of supplier relationships**
- **One budget to manage and report on**
- **One pupil and parent community to engage with**

- **One website**
- **One set of policies**
- **One admissions process**

This means less work, and hence the potential for cost reductions, in:

- senior leadership (c.£100,000 including pension and NICs costs from moving to a single Head Teacher);
- administration (c.£40,000pa); and
- opportunities through more flexible working across the years and sites (c.£40,000pa).

Any proposed changes to staffing would be subject to a formal consultation with affected staff.

We envisage the senior leadership structure below the Head Teacher remaining broadly as it is now.

Other possible financial benefits of a merger include:

- The possibility that the automatic transition into Y3 in an all-through primary would increase pupil retention and hence funding – two extra pupils in a year would bring in around £10,000 a year, increasing over time as the extra pupils rise up through the year groups.
- Possible opportunities for bulk purchasing (for example, paying for one licence for educational resource platforms). We have not yet scored any savings from this.

Offsetting this would be a reduction in lump sum funding from central government. Schools receive lump sum funding just for being a separate school and for operating across split sites. These payments are designed to reflect the extra costs involved in those circumstances. We would expect to lose around £70,000 of lump sum funding under merger.

Taken together this means we would expect merger to improve our budgetary position by around £120,000+ a year. This would put us comfortably into in-year surplus and enable us to clear our debt to BHCC by 2029/30, potentially sooner. We would then be able to reinvest the projected surpluses into extra support for our children. Savings would be achieved by reducing duplication and through economies of scale – maintaining the quality of education – not through arbitrary cuts that impose extra demands on our heavily loaded team and reduce support for pupils.

9. Looked at financially, how does merger compare to federation?

We consider that merger is significantly better than federation in financial terms for our schools because it cuts out more duplication and delivers more economies of scale. Most of the things we would only need to do once under merger we would need to do twice, or at least make an active decision not to do twice, under federation. Relative to merger this means we'd require more senior leadership, there would be more administrative work to do and there would be less scope for flexible working across the schools.

Relative to the current position our calculations indicate that federation might generate around £50,000 of savings a year, with no reduction in central government funding. This would not be enough to eradicate the cumulative deficits. We'd need to find an extra £70,000+ a year through deeply uncomfortable cuts. This could mean, for example, 2-3 fewer Teaching Assistants across the schools than under merger.

10. What are the risks associated with merging?

Any major change brings risk and we do not have the option to stay as we are. Governors and senior leaders would seek to mitigate these risks in the coming months. Some of that work can only really begin when the Local Authority makes its decision in February and, subject to that decision, we begin detailed implementation planning. Questions 11 - 13 look in more detail at potential risks. Question 16 outlines mitigation for risks.

11. Will merger lead to a loss of focus on Early Years or Key Stage 1 or Key Stage 2?

Governors and school leaders recognise the importance of all stages of primary education. We are determined to maintain the right balance between Early Years, KS1 and KS2 – we don't plan any changes to this. We would monitor the balance very carefully with the staff team in the implementation phase and beyond. We understand there is a fear that all funding will be directed towards Early Years and KS1 (resources) by some, or the end of KS2 (SATS) by others. We plan to mitigate the risk of this (in actuality and in perception) by having a strong and robust Senior Leadership team and good financial management practices. As noted in this paper, the budgets are so thinly stretched and the Governors, Senior Leadership Teams and the PTFAs are already working very hard to make very little money go a long way for the benefit of the children. We would continue to do this.

We have not been able to find any compelling, statistically significant, evidence that school mergers, in and of themselves, negatively affect pupils' attainment, particularly if they are well-managed by a competent leader. We have considered, in this regard, the evidence provided by a parent following a public consultation event. We fully acknowledge that all change can feel hard and that re-organisation can absorb the minds of those delivering change. However, we have also been told by the Local Authority that doing nothing is not an option. Change is unavoidable and

we would rather be the authors of that change than have changes imposed on us, as has happened to other schools in the city. While we note the evidence provided to us about the limited financial benefits that have been achieved by some school re-organisations, we have looked at the financial situation and savings to be made in our specific schools rather than elsewhere, and we remain of the view that financial savings can be made in our context.

12. There is very little time between the February decision point and the proposed merger in September. Would we be ready? Should we delay implementation until later to give us more time?

There would be a lot of work to do to prepare for the change if the Local Authority decides to proceed in February and time would be tight. We believe it is achievable, however, and in line with the time taken to bring in similar changes in other schools. To mitigate this we aim to prepare so that we are in a position to move quickly if a decision is made to proceed, for example, to ensure we are ready to recruit a permanent Head Teacher and action the constitution of a new Governing Board. We would also prioritise those steps that need to be taken before September and put a plan in place for those things that can be done over a longer time frame.

13. Would the projected reductions in senior leadership and other areas increase demands on teaching staff?

We accept that the loss of two dedicated headteachers to serve the joint school community will have some impact - we have fantastic leaders in both schools who provide support to staff and pupils. However, the reality is that we are unlikely to be able to maintain this level of senior leadership considering the financial position of the schools and the fact the schools are set to effectively decrease in size by a third with the consequential budget reductions. If merger is rejected, we would likely need to make reductions in senior leadership positions over time across the schools in any event.

We believe merger best helps ease the impact in a reduction of senior leadership time by reducing demands on senior leadership through simplification and the removal of duplication. Through merger, we are trying to reduce the workload for senior leaders as we remove the duplication of tasks such as budget management, preparing for Ofsted and updating policies. We do not believe this would increase specific demands on teaching staff. We envisage a proposed senior structure that would be comparable with that in other all-through primaries of a similar size and structure, but working across two sites would bring additional operational challenges. We would work closely with an appointed headteacher and deputies in each site to ensure that reasonable levels of senior support are available fairly and appropriately across the sites to support teachers and pupils. We are also assisted by the proximity of the school sites – other split site schools work successfully across greater physical distances.

14. What have the Governors considered to mitigate these risks?

By planning ahead systematically with school leadership and other staff where appropriate, to ensure continuity of leadership and maintenance of strong learning outcomes, we would:

- Ensure the appointment of the right headteacher for our new school. They would be someone who is experienced across the primary age range and understands that best primary practice is built on the most effective pedagogy of Early Years and Key stage 1 that is then extended and deepened to meet the needs of Key stage 2 pupils.
- Give priority to early intervention through understanding that putting the right levels of support in early on makes a significant positive impact on successful learning later.
- Put in place a leadership and management structure that ensures a strong voice in decision making for all year groups within the new school to ensure the best continuity and coherence in learning.
- Continue to prioritise the key transition point between Y2 and Y3.
- Prioritise the development of key joint policies such as "Teaching and Learning Policy" and “Behaviour Regulation Policy" to embed from the outset the best continuity for the children.
- Acknowledge that children of different ages within the primary age range are more similar than they are different. As such we are committed to researching and exploring innovative pedagogy and learning and teaching approaches that blend early years with highly effective subject-specific direct teaching to ensure the highest standards of achievement, progress and attainment for all children.
- Utilise to the full the considerable knowledge and expertise of our staff across both schools and support and empower them to continue to make a positive impact on our children.

Mergers can deliver continuity of education, staffing and estate efficiencies, and clearer single-school leadership - but in Brighton & Hove some recent experience shows the biggest risks are demography-driven funding shortfalls following unexpected birth rate changes, leadership and implementation instability, and poor expectation/communications management. Strong financial modelling, phased implementation, robust governance and active parental engagement are considered to be the clearest mitigations.

15. Why did the Governing Boards feel merging was preferable to federating?

We have discussed the benefits of merging elsewhere in this paper. Please also see the answer to the question on the financial case.

In addition, though federation provides the opportunity for cooperation between the two schools, it is less of a defined path. Each decision of whether to work together and how to work together would have to be negotiated between the two schools, taking up limited time and resource. The budgets of federated schools remain separate, creating more work in terms of preparing and managing the budget as well as missed opportunities for economies of scale.

16. What happens if the Local Authority rejects the proposal, following consultation?

We would then go back to the drawing board and determine how to make the significant savings that would be required to be made in the existing schools. If the merger is rejected, the cuts that each school would have to make in year 2026/27 and beyond would negatively affect the children's experience and provision, and place extra demands on staff, such as the loss of some Teaching Assistants (TAs).

17. What sort of cuts would have to be made if the merger doesn't go ahead and we stay as we are?

If the merger does not go ahead and the schools take no further action, each individual school would have to start making a series of very undesirable cuts to their budgets. These cuts would affect the children and the workload of staff in a significantly detrimental way. As individual schools, all of the duplication discussed elsewhere in this paper would continue and each school would continue to have a statutory obligation to have a full time headteacher. For each school to be able to afford this, and to clear the cumulative deficit within the Local Authority timeline, Governing Boards and Senior Leadership Teams would have to make changes of the following nature and scale:, without the reduction in workloads that merger would bring:

- Reduction of Deputy Head Teacher role to three days a week with the other two days a week being teaching days;
- Reduction in school business manager role;
- Reduction in SENDCo coverage;
- Cutting the roles of TAs and Higher Level Teaching Assistants (HLTAs), which would increase the workload of teachers;
- Cutting specialist teacher roles;
- Removing subsidies to support clubs and trips for disadvantaged pupils further widening the gap.

We clearly don't want to do those things, and actual decisions would be made further down the road, but measures of this scale and nature would be needed if we remain as stand-alone schools.

18. What happens if we don't make the cuts to the budget?

The Local Authority have to ensure schools meet their budget obligations and if it is found that the existing Governing Boards are unable to achieve these expectations, there have been instances where the Governing Board have been replaced with officers from the Local Authority who then go about making the changes required to achieve the budget cuts. We believe this possible outcome would be worse for the schools than a merger managed by the schools' own Governing Boards, who care deeply about both schools and understand the local context.

19. How would early years education change in a merged primary school?

The Governors and the Senior Leadership Teams of both schools understand the importance of the early years education provided at SIS. There are no plans to change the early years education provided to children under a merger. We understand how thinly stretched staff are, we believe that a merger changes the shape of the Senior Leadership Team but does not change the day-to-day responsibilities of Teachers, TAs and HLTAs.

20. Would PE Funding be lost?

If funding continues, a newly merged primary school would receive one amount of funding. However, any funding the new school gets would be distributed appropriately for the activities the school delivers. It is unclear whether the DfE will continue to provide PE funding nationally in any case.

21. Would we lose places for Let's Dance and The Children's Parade?

The number of places each school is offered for these events changes each year. We know this represents an important experience for many children and we will aim to offer as many places for these events for those children keen to participate in them as they progress through the merged school. A benefit for parents were we to have a Stanford Primary entry to the parade including children from Key Stage 1 through Key Stage 2, is that it would be far easier for parents with children currently at the Infants and the Juniors to enjoy the parade with both children. Since the first consultation meeting, we have contacted the organisers of Let's Dance and they have agreed that a new merged Stanford Primary School could have two places in the show.

22. Would the names, logos or uniforms of the schools change?

Yes, it is likely we would synergise the swan logos, which are essentially similar, into one logo for the new school. It is worth noting that wearing the logos is not compulsory in any case. So school uniforms would only change gradually over time where the old logos are shown.

23. Would the start and end of school times change?

There are no plans to change this, and the schools would adhere to DfE guidance and deliver at least a minimum length of school week. School start and end times would continue to be staggered to allow for drop off and pick up from both sites.

24. Would term dates change?

There are no plans to change this.

25. Would this affect the admissions process?

Admissions policies would remain the same for applying for a reception place. There would be no need to then apply for a place for Year 3 as is the case currently. Instead pupils would have a through primary experience.
We will otherwise continue to serve the local community and offer places to children based on the same criteria we have always used.

Employment of Staff

26. What would it mean for the staff?

If the decision to merge the schools is taken, the new staffing structure would be developed as part of the planning for September 2026. The exact staffing structure for the future cannot be fully known until we have worked through the organisational arrangements for the new school. Governors are committed to avoiding, where possible, compulsory redundancies. There would be a formal consultation with affected staff, including the opportunity for staff to meet on a 121 basis where appropriate, as and when specific staffing changes are proposed.

Governors would work with the Local Authority, Staff and their Unions to determine the best ways to manage any changes needed.

27. How would staff employment terms and conditions be affected?

Providing there are no changes to the roles, the terms and conditions of staff would go unchanged as staff remain employed by the Governors and BHCC and that doesn't change should we merge. Staff would be provided with a variation of contract letter stating that the school name has changed to the new name, most likely, Stanford Primary School. Should any changes to roles be proposed at a later stage these would be subject to formal consultation with affected staff.

28. How would continuous service be affected?

Continuous service would continue for staff if the merged school is established.

29. What happens to staff pensions?

There would be no change to staff pensions. Teachers would remain in the Teachers' Pension Scheme and Support Staff would remain in the Local Government Pension Scheme.

30. Would staff be required to sign a new contract?

No, in most cases there would simply be a variation of the current contract to show the name of the new school as the place of work. If there are any other changes following a formal consultation process then, if agreed, these changes would result in a new contract being issued.

31. What if I currently have a TLR linked to my post?

If you have an existing Teaching & Learning Responsibility (TLR) linked to your post and there were to be significant changes to your role (these are not currently planned), those changes would be consulted on and regardless of the outcome of the changes your role, the TLR would be salary safeguarded for three years in accordance with School Teachers Pay & Conditions Document (STPCD).

32. Would staff have to apply for their own or other positions?

If the plans to merge are agreed there would be a formal staff consultation. Any future plans would be outlined at that point including a clear statement of whether people are affected and how.

33. Would staff have to work at the other site/move between Key Stages?

There may be opportunities to move to work in other Key Stages and move between sites for those interested to do so. Any changes that are proposed would be subject to formal consultation, including the opportunity to have a 121 meeting at which staff could outline their preferences. We would aim to act in line with staff preferences where it is possible to do so.

Governance

34. How would the governance structure of the schools' change?

The new school would have one Governing Board operating in the same way as each school currently has their own Governing Board. This would include elected parent, staff and community members. Existing Governors would be invited to apply to join the new Governing Board in due course should the proposal go ahead.

Consultation Opportunities

The formal consultation period runs from 29 September through to 16 November 2025.

We have organised three consultation meetings for parents, carers and the community: one at each school, one in the morning and one in the evening, plus one online meeting. We have also arranged for three consultation meetings for staff, again one at the Infant School, one at the Junior School, two meetings after school and one on an inset day so as to enable all staff to attend regardless of their working pattern.

Additionally, there is the online portal which is open throughout the consultation period from 29 September to 16 November 2025, with the survey for anyone to share their thoughts on the proposals. Further details of upcoming events and how to access the survey are below:

In Person Public Meetings	Tuesday 4 November (9,30am – 10.30am) Stanford Junior School, Stanford Road
Online Public Meeting	Tuesday 4 November (4.00pm – 5.30pm) – Microsoft Teams Use this link to join the meeting
Online Feedback	Complete the survey on "Your Voice" Portal throughout the consultation period. Access the portal at: Project: Stanford Infant and Junior Schools merger proposal | Brighton & Hove City Council
Email	Email your comments to: educationandlearning@brighton-hove.gov.uk

35. What happens after the consultation?

All responses to this consultation would be considered by the Local Authority before a decision is made. The school and council are committed to a transparent and thorough decision-making process:

Phase 1: Consultation and Analysis

- Formal Consultation – 29 September – 16 November 2025 (minimum of 6 weeks)
- Analysis of all feedback – 17 November – 23 November 2025

Phase 2: Statutory Process

- If proceeding, publication of Statutory Notice proposing merger of Stanford Infant and Stanford Junior Schools
- Further representation period: 24 November – 21 December 2025 (further 4 weeks for further submission of comments on the proposals)
- All additional feedback considered and incorporated

Phase 3: Decision and Planning

- Cabinet members to meet on 12 February 2026 to consider all representations and evidence before making the final decision on whether to proceed with the merger

Phase 4: Implementation

- If Cabinet Members agree to proceed then the school would implement from 1st September 2026

If the proposals go ahead there would be a formal staff consultation with all affected staff.

If the decision is taken not to proceed, then the schools would continue to operate as they did previously under existing arrangements. Financial savings would, however, need to be found in both schools.

Brighton & Hove City Council

Council Agenda Item 78

Subject: **School Admission Arrangements 2027-28**

Date of meeting: **29 January 2026**

Report of: **Corporate Director - Families, Children & Wellbeing**

Contact Officer: **Name: Richard Barker, Head of Education**
Email: Richard.Barker@brighton-hove.gov.uk

Ward(s) affected: All

For general release

1. Purpose of the report and policy context

1.1 This report details the proposed school admission arrangements for the academic year 2027-28 for the schools in the city where the council is the admission authority.

1.2 The report details the outcome of the consultation undertaken between November 2025 and January 2026 on the proposed changes to the Published Admission Number of two schools, a change to the sibling criterion for secondary schools and a change to how waiting lists are managed.

1.3 The council will be asked to approve the recommendations in this report and determine the admission arrangements, including the scheme for coordinated admissions and the “relevant area” for the academic year 2027-28.

2. Recommendations

2.1 That Full Council agrees to make no changes to the council’s admission arrangements other than the proposed changes listed below in recommendations 2.2 to 2.6. The full admission arrangements are set out in Appendix 2.

2.2 That Full Council agree a change to the Published Admission Number (PAN) of Rudyard Kipling Primary School from 45 to 30 pupils.

2.3 That Full Council agree a change to the Published Admission Number (PAN) of Downs Junior School from 128 to 96 pupils, to reflect changes previously made to the PAN at Downs Infant School.

2.4 That Full Council agree to change to the admission priorities for secondary schools so that the sibling link can be applied regardless of the catchment area where families live.

2.5 That Full Council agree to a change to the way waiting lists are operated.

2.6 That Full Council agree to the Primary and Secondary coordinated schemes and to make no changes to the “relevant area”.

3. Context and background information

3.1 Admission Authorities are required to determine their admission arrangements annually. Where changes such as a decrease in the PAN are proposed the admission authority must first publicly consult on those proposed arrangements. The School Admissions Code sets out those groups and individuals who must be consulted. These include parents of children between the ages of two and eighteen, other persons in the relevant area who in the opinion of the admission authority have an interest in the proposed admissions all other admission authorities such as governing bodies within the relevant area and any adjoining neighbouring local authorities.

3.2 Consultation and determination of admission arrangements takes place approximately 18 months in advance of the academic year to which they apply. For the academic year 2027-28 the consultation process had to take place between 1 October 2025 and 31 January 2026 and was required to last for a minimum of 6 weeks.

3.3 Following the consultation the council is required to determine its admission arrangements by 28 February 2026 to conform to the requirements of the School Admissions Code.

3.4 The relevant papers for the 2027-28 admission year for the City of Brighton & Hove are attached as appendices to this report.

3.5 Schools are funded by the government and not the council. The funding is largely done on a per-pupil basis and nearly all of it covers staffing costs. If schools don’t have enough pupils attending or suffer from fluctuating numbers, they may not be able to operate in a financially efficient way and risk entering a budget deficit.

3.6 Pupil numbers starting Reception classes across the city have been falling and are not forecast to increase in the foreseeable future. Appendix 6 shows the current projection of primary pupil numbers until September 2029, pupil numbers are expected to be no more than 1900 pupils. The city currently has 2415 primary places for Reception age pupils in 2026. The proportion of surplus places in September 2027 is 25%. The council’s forecasts do not currently model an individual school’s estimate of pupil numbers as this can be affected by a number of variables, however, strong trends of parental preference provide an indication which schools can expect to fill all or a high proportion of places each year. Schools where this is not the case could be susceptible to low class numbers that will negatively impact on their finances.

3.7 Appendix 7 shows the current projection of secondary pupil numbers until September 2031. The proportion of surplus places in September 2027 is 11%.

3.8 The School Admissions Code details that once admission arrangements have been determined for a particular school year, they cannot be revised downwards by the admission authority unless the admission authority consider such changes to be necessary in view of a “major change in circumstances”. Such proposals must be referred to the Schools Adjudicator for approval.

The Consultation Process

3.9 On the 13 November 2025, Cabinet agreed to undertake a public consultation on the council’s proposed admission arrangements for September 2027.

3.10 The public consultation ran between 14 November 2025 – 9 January 2026, there were 5 public meetings and 344 responses to the online consultation were received. Three meetings were arranged to focus on the schools featured in the proposals, one during the daytime and two in the early evening. There were also two general meetings to discuss all other aspects of the proposals.

3.11 38 people attended meetings held during the consultation period. The Council also publicised the consultation by issuing press releases and advertising on social media.

3.12 There were 8 direct responses to the council’s School Organisation and School Admissions email accounts about the admissions arrangement proposals and a petition of 201 names supporting the proposed changes to the sibling priority.

3.13 Signatories to the petition, organised by Equity in Education, were asked to support one aspect of the consultation namely the proposed sibling link. These responses have been included as positive responses to the relevant question in the consultation. The statement that signatories have signed up to support is as follows:

Signatories to this petition support the proposed change to the sibling link priority for secondary school admission in Brighton and Hove community schools from 2027/28. Making the sibling link priority apply equally to all families across the city regardless of where they live.

3.14 An offer was made for parents to contact the council to discuss the proposals and provide a verbal response to the consultation that could be recorded by officers; however, this offer was not taken up by any respondents.

3.15 Additionally, the Council endeavored to encourage responses to the consultation from groups in the city who might not usually participate in consultations on school admissions. PACC and Amaze issued information to parents in their community about the proposals and consultation and EALTS (English as an Additional Language and Traveler Service) provided information, advice and assistance to complete the consultation to families through their Home/School Liaison workers.

3.16 Nurseries and childcare providers in the city were also advised of the

consultation and asked to encourage families to participate.

Published Admission Numbers

3.17 There were 314 responses to the consultation through YourVoice, about reducing the PAN for Downs Junior School, with a slight majority in favour of the proposal. The percentage of responses are given in the table below.

Strongly disagree	12%
Disagree	11%
Neither agree or disagree	49%
Agree	21%
Strongly agree	7%

3.18 Responders were given the option to provide comments. There were 29 comments given of which most expressed support for aligning the admission numbers between the infant and junior schools.

3.19 Two members of the public attended one of the public meetings and the Governing Board did not make a formal representation to the council but had previously outlined its support for the proposed change in PAN.

3.20 There were 311 responses to the consultation through YourVoice, about reducing the PAN for Rudyard Kipling Primary School, with no overall majority agreeing or disagreeing with the proposal. The percentage of responses are given in the table below.

Strongly disagree	9%
Disagree	9%
Neither agree or disagree	65%
Agree	12%
Strongly agree	5%

3.21 Responders were given the option to provide comments. There were 15 comments given which raised concern about the viability of one form entry schools and questioned the local demand for school places and whether reducing the PAN would negatively impact on the schools funding and support for vulnerable children. Views were expressed that the PAN for Woodingdean Primary School should also be reduced so that there is equality across both schools in the area.

3.22 During the consultation period the Schools Adjudicator determined that, following a request by the Governing Board which was actioned by the Council, the PAN of Woodingdean Primary School would be reduced in September 2026 from 60 to 30 places. This decision is for one year only. The school is expected to join the Eko Trust in Spring 2026 and as an academy its admission arrangements will no longer remain the responsibility of the council.

3.23 No members of the public attended the public meeting and the school did not make a formal representation to the council but had previously outlined its support for the proposed change in PAN.

3.24 Consultees where then asked if they agree or disagree with the proposed

admission numbers for other community schools as given in Appendix 1. There were 299 responses to this question with the percentage of responses are given in the table below.

Strongly disagree	17%
Disagree	9%
Neither agree or disagree	56%
Agree	14%
Strongly agree	4%

3.25 There was the option to add comments on this question to which many respondents expressed concerns about the Published Admission Number (PAN) at both primary and secondary schools, with a recurring theme that PANs at larger or more popular schools are too high and should be reduced to support the viability of smaller or less popular schools. There was also a contrary view raised suggesting that the PANs at less popular schools should be reduced and PANs at more popular schools increased.

Sibling Link

3.26 Significant changes were made to the secondary school admission criteria with effect in 2025-26 and again 2026-27. For 2025-26 criteria were introduced to give priority to children eligible for Free School Meals (up to the city average). For 2026-27 among other changes an 'open admission' criterion was introduced to give priority for pupils living in a catchment area containing one school (up to 5% of the school's PAN). Both of these changes will help to facilitate more children to secure places at schools outside their catchment area.

3.27 It is proposed to change the sibling link priority for 2027-28 so that it applies to all pupils regardless of the catchment area where they live. This was put forward in order to allow families who have obtained an out of catchment area place through either the Free School Meals or the open admission priority criteria to benefit from the continuity where younger siblings will be able to attend the same school. This is currently only a benefit that applies to families who have an older sibling in the designated catchment school.

3.28 Consultees were asked whether they agreed with this proposed change. The majority of respondents replying via the YourVoice portal strongly disagreed with this proposal. There were 332 responses to this question via the portal with the percentage of responses given in the table below.

Strongly disagree	61%
Disagree	5%
Neither agree or disagree	4%
Agree	7%
Strongly agree	23%

3.29 There were 199 comments, via the Yourvoice portal, provided on this part of the proposal with the majority expressing strong concerns that the proposed changes to sibling priority and out-of-catchment admissions will further reduce the opportunity for children living within catchment areas to secure places at their local schools. Concerns were raised highlighting the risk of increased movement of local children, particularly in the central

Brighton dual catchment area.

3.30 When the 201 responses to the petition, seeking support for the proposed change to the sibling link priority, are taking into account the percentage of responses is altered, as outlined in the table below. This summary combines strongly disagree and disagree, as well as combining strongly agrees and agree with the petition responses.

Disagree	41%
Neither agree or disagree	2%
Agree	57%

3.31 During the consultation it was proposed that the arrangements could be adjusted to achieve a balance between the intention to create a sibling link priority for all pupils with the acknowledgment of the potential impact that this might have on those living in a specific catchment area. In order to achieve this it was proposed that there could be two separate criteria creating a distinction between younger siblings of pupils who live in the catchment area and those living outside. Those in the latter group would also being placed in a separate priority order and would be considered as part of the 5% of open admission places.

3.32 Modelling of pupil numbers with the expanded sibling link definition have indicated that a small number of pupils in 2027 living in the catchment areas for Patcham High School (32 pupils) and the catchment area for Dorothy Stringer & Varndean (20 pupils) may not be able to secure a place at their catchment area school on National Offer Day. Although the operation of the reallocation pool and waiting lists has meant, historically, that places will often become available for pupils after the initial allocation and before the start of the new academic year.

3.33 The Schools Adjudicator, in a recent report relating to the council's admission arrangements, made it clear that there is no requirement for catchment areas to accommodate all pupils residing in them and stated that "the Code requires that admission arrangements set out how places will be allocated in situations where there is oversubscription. Admission arrangements do not have to tell parents whether or not their child will get a place at a school, or even how likely this will be."

3.34 Other responses to the consultation strongly supported this proposal, citing benefits for families, community cohesion, and practicalities such as uniform reuse and reduced travel. As outlined previously, a petition of 201 names was also received in support of the proposed changes to the sibling link.

3.35 It is therefore felt that on balance, providing families with greater clarity about the school that younger siblings might attend and minimising the barriers to families taking up the opportunity afforded by the free school meals and open admission criteria outweighed the potential impact on those who as a result of the change in policy might not be able to gain a place at their catchment area school.

Waiting lists and Reallocation pools

3.36 It is proposed to change the operation of waiting lists and reallocation pools so that parents wanting their child to be considered for a reallocated place will need to actively make a request to be added to a waiting list or reallocation pool. It is also proposed that where a place is subsequently allocated from a waiting list or reallocation pool, any previous school offer will automatically be withdrawn.

3.37 Consultees were asked whether they agreed with this proposed change. The majority of respondents strongly disagreed with the way in which the proposal could operate but some respondents understood the rationale for putting forward a change. There were 326 responses to this question with the percentage of responses are given in the table below.

Strongly disagree	43%
Disagree	17%
Neither agree or disagree	17%
Agree	16%
Strongly agree	6%

3.38 Comments provided on this part of the proposal suggested it would increase stress and administrative burden for families, particularly those already under pressure, and could lead to some missing out due to missed communications or deadlines. Some responses suggested parents should be automatically added to waiting lists if they do not get their first preference, rather than having to opt in.

3.39 There were concerns raised about the proposal to automatically withdraw a previous offer when a new one is made. It was suggested that families need time to make decisions, especially as circumstances can change or social factors such as where friends are going may influence choices. Respondents also indicated that parents may initially want to be added to a waiting list but would be less likely to want to change the allocated school once transition arrangements have been participated in and, for example, uniform bought.

3.40 The School Admissions Code states that only one offer per child should be made by the Local Authority so the proposal is in line with the code and a similar process of automatically withdrawing a previous offer is successfully operated by other local authorities such as East Sussex, Reading and Medway councils.

3.41 However, in response to the concerns raised about automatically withdrawing the previous offer, it is proposed to amend the arrangements so that parents are given 5 days, following a waiting list offer, to request that the previous school place is reinstated if this is their preferred school. This proposed amendment seeks to address the predominant concern about parents being able to make an informed decision and introduces a short period of reflection for families without maintaining a level of uncertainty for schools about pupil numbers and transition arrangements.

3.42 Many responses to the consultation highlighted the need for clear,

accessible, and well-timed communication, with reminders and deadlines, to ensure all parents understand the process and are not disadvantaged by a lack of information. The council commits to ensuring any changes in process will be clearly outlined to parents who will be applying for school places for September 2027 and onwards.

The coordinated admission schemes for 2027-28

3.43 Many of the responses to this question provided comments on the Council's approach to the consultation process. Some responders indicated that this part of the consultation was unclear. There were no specific responses that have led to changes in the proposed schemes and therefore, it is recommended that no change is made to these schemes.

The 'relevant area' for consultation

3.44 Responses to this question suggested it should remain unchanged or that it could include schools in Lewes as these are increasingly popular with Brighton & Hove residents. The 'relevant area' is the area for a school within which the admission authority for that school must consult all other prescribed schools on its admission arrangements. It is recommended that no change is made to the 'relevant area' as currently stated.

General comments on the council's admission arrangements

3.45 General comments on the consultation proposals highlighted dissatisfaction with the ongoing and frequent changes to school admission arrangements, and a lack of clear data and impact modelling to justify the proposals. There was also a call for the council to pause any further changes and allow time to assess the impact of changes made for 2025 and 2026 before introducing further changes.

4. Analysis and consideration of alternative options

4.1 The council could propose making further changes to its admission criteria through the consultation process however the existing arrangements upon which these proposals build have been subject to a recent review by the School's Adjudicator in October 2025 and determined lawful. The proposed change to the sibling link addresses the remaining issue associated with the recent changes to the arrangements. Therefore no other change was considered to be required.

4.2 The council could propose making no change to the secondary admission arrangements and not support families, utilising the recent changes to admission criteria, to assist younger siblings with attending the same secondary school.

4.3 The council could seek to make no change to the PAN of any school. Whilst this could help the council to meet a greater level of parental preferences it will provide more uncertainty for schools in their planning and could place more schools at risk of financial difficulty.

4.4 The council could propose to change the PAN at other community schools in the city, however no other governing body has indicated a willingness to

support proposals to reduce their PAN as part of this consultation.

4.5 All admission authorities must consult where they propose a change to their admission arrangements which includes decreases to the PAN. Community schools have the right to object to the Schools Adjudicator if the PAN set for them is lower than they would wish. There is a strong presumption in favour of an increase to the PAN to which the Schools Adjudicator must have regard when considering any such objection.

5. Community engagement and consultation

5.1 The public consultation ran between 14 November 2025 and 9 January 2026. There were 5 public meetings attended by 38 interested parties. 344 responses were received online through the YourVoice consultation portal and 8 written responses were provided by email. A petition of 201 signatories, organised by Equity in Education, supporting the proposed changes to the sibling link was submitted and accepted.

6. Financial implications

6.1 School budgets are determined in accordance with criteria set by the government and school funding regulations dictate that the vast majority of the delegated schools block of funding must be allocated through pupil-led factors. This means school schools with falling pupil numbers are likely to see reductions in annual budgets. This situation can be particularly challenging where pupil numbers in year groups fall well below the expected number, based on the PAN of a school.

6.2 Without a planned reduction in PAN it will be challenging for those schools to plan ahead for staff reductions and set a balanced budget. For the schools where reductions in PANs are proposed there will be direct implications and the need to plan future years' budgets to reflect lower pupil numbers and the consequent impact on budget allocations. However, planned reductions in PANs may mean schools are more likely to be able to balance their budgets if operating with full forms of entry.

6.3 The proposal to decrease PANs is intended to reduce the number of surplus school places to safeguard and indirectly benefit the wider provision across the city. By reducing the number of surplus places in the city in the longer term there is an expectation that school occupancy rates will increase, meaning that school budgets are more sustainable.

Name of finance officer consulted: Steve Williams Date consulted 12/01/26

7. Legal implications

7.1. Part 2A of the council's Constitution provides that any strategic issues or reviews of the council's school admission arrangements, including any changes to catchment areas, are reserved to Full Council.

7.2. Section 88C of the School Standards and Framework Act 1998 ('the Act') and the School Admissions (Admissions Arrangements and Co-ordination of Admission Arrangements) Regulations 2012 ('the Regulations') set out the statutory framework for school admissions. The School Admissions Code

2021 (‘the Code’) is statutory guidance and imposes mandatory requirements in relation to the discharge of functions relating to admissions. Admission Authorities must ensure that their admission arrangements are compliant with the Code.

7.3. Under the Act admission authorities are required to determine their admission arrangements annually. Arrangements must be determined 18 months in advance of the academic year to which they apply.

7.4. Where changes to admission arrangements are proposed to admission arrangements the admission authority must first publicly consult on those proposed arrangements. The Regulations state that consultation must be for a minimum of six weeks and must take place between 1 October and 31 January of the school year before those admission arrangements are to apply. Following consultation, the admission arrangements must be determined by 28 February.

7.5. Once all arrangements have been determined any person or body (e.g. parents, schools) who considers that any maintained school’s arrangements are unlawful, or not in compliance with the Code or relevant law relating to admissions, can make an objection to the Schools Adjudicator. Objections can be made if the PAN for a school is set lower than the school would wish or if the catchment area set for a school is considered to be unfair or unreasonable. The Code provides that there is a strong presumption in favour of an increase to the PAN to which the Schools Adjudicator must have regard when considering any objections to a reduction in the PAN.

7.6. In drawing up their admission arrangements, admission authorities must ensure that the practices and the criteria used to decide the allocation of school places are fair, clear, and objective. Parents should be able to look at a set of arrangements and understand easily how places for that school will be allocated.

7.7. Oversubscription criteria must also be reasonable, clear, objective, procedurally fair, and comply with all relevant legislation, including equalities legislation.

Name of lawyer consulted: Serena Kynaston Date consulted: 12/01/26

8. Risk implications

8.1 The council could find that its determined admission arrangements are objected to and are ruled to be non-compliant. However this risk is mitigated by the extensive review undertaken by the Schools Adjudicator and published in October 2025.

8.2 The findings of that review have informed the council’s planning of the consultation and the design of the proposals consulted up as well as the recommendations outlined in this report.

8.3 Not making reductions to the PAN of both Downs Junior and Rudyard Kipling schools could lead to further pressure son the council's own finances as a consequence of the need to underwrite the extent of current school budget deficits.

9. Equalities implications

9.1 In advance of the consultation the council undertook an Equalities Impact Assessment (EIA) which accompanied the Cabinet report.

9.2 The council has subsequently completed an EIA to accompany this report that can be found at Appendix 5.

9.3 The recommendation of the EIA is to proceed with caution noting that Council's will often amend and change city-wide admission arrangements and/or changes to catchment areas as demographics and circumstances of a local area change.

9.4 There are some aspects of the admission arrangements that provide an individual pathway for a child or family's individual circumstances to be considered. In the case of the appeal panel this is after the allocation has been made.

9.5 The views heard about the proposals were not unanimous and care needs to be taken to consider where there are complex impacts. Where there may be disadvantage so others with protected characteristics will also benefit and so it can be concluded that no unfair disadvantage occurs.

9.6 The most significant impact will be on children seeking a place in a community secondary school who do not live in a catchment area but do have an older sibling attending the catchment school. Their priority for a place will be higher than in previous years.

9.7 Pupils with SEND who qualify for an Education Health and Care Plan (EHCP) are not impacted by the school admission arrangements being consulted upon. Mainstream community schools are expected to meet the needs of all pupils without an EHCP and are required to make reasonable adjustments in line with equality duties. However, the proposals may negatively impact pupils with disabilities where mitigations in place to minimise the negative impacts of managing within a community school are affected. For example, being placed with a friendship group or trusted adults, or where journeys to secondary school are longer and/or undertaken using public transport.

9.8 Cumulative effects are likely to be experienced by those whose children have SEND as a result of the impact of managing a child's needs before and after formal schooling together with the demands that schooling itself places on the child. We know that there can be a high correlation between families with children with SEND and socio-economic disadvantage and this will be compounded when the family live in a dual catchment areas and where the family do not have a sibling link to one of their catchment area schools.

10. Sustainability implications

10.1 Wherever possible the council aims to reduce the number of journeys to school undertaken by car. A reduction in the availability of school places across the city could risk a rise in the number of journeys undertaken by car.

10.2 Schools are expected to have a School Travel Plan to:

- reduce the number of vehicles on the journey to school
- improve safety on the journey to school
- encourage more active and sustainable travel choices

10.3 Any change in PAN is expected to require the school's travel plan to be re-written to take account of the change.

10.4 The council monitors air quality across the city, throughout the year, at approximately 100 locations as part of its statutory duties. Figures are published annually to enable changes and trends to be identified, and current results show continuing gradual improvements. Travel patterns and choices of transport will not become apparent until after the proposed changes to admission arrangements are established, although these are unlikely to have a significantly adverse effect on air quality in the city generally.

10.5 Changes to PAN, which lead to a reduction in the number of classes the school has and the classrooms being used can lead to areas of a school being more efficiently managed in relation to energy use at a time of uncertain energy costs for schools.

11. Conclusion

11.1 It is proposed to make no changes to admission arrangements other than the ones outlined below.

11.2 It is proposed that the Published Admission Number for Downs Junior School is reduced from 128 places to 96 places to match the previous reduction at Downs Infant School.

11.3 It is proposed that the Published Admission Number for Rudyard Kipling Primary School is reduced from 45 places to 30 places.

11.4 It is proposed that the sibling link for secondary schools should be applied regardless of the catchment area where families live. Suggestions during the consultation that the arrangements should distinguish between those with a sibling link living within and outside the catchment are not proposed to be taken forward.

11.5 It is proposed to implement a change to the way the council operates waiting lists and reallocation pools. Rather than implement the proposal consulted upon. It is recommended that parents are given 5 days, following a waiting

list offer, to request that the previous school place is reinstated if this is their preferred school.

11.6 Once the arrangements for September 2027 are determined it is possible for a variation to be requested of the Schools Adjudicator for other schools should there be a major change in circumstances. Any future decision will be informed by the pattern of parental preference for September 2026, changes of strategic direction by schools in the city and the results of future financial planning.

Supporting Documentation Appendices

1. Published Admission Numbers for Primary and Secondary schools.

2. Admission arrangements and priorities for community primary and secondary schools.

3. Coordinated scheme of admissions – primary.

4. Coordinated scheme of admissions – secondary.

5. Equality Impact Assessment.

6. Primary school pupil forecast.

7. Secondary school pupil forecast.

Proposed Primary Admissions Numbers 2027/28	Planned Admission No. 2027-28
Name of School	
Aldrington CE Primary	60
Balfour Primary	90
Benfield Primary	30
Bevendean Primary	60
Bilingual Primary	90
Brunswick Primary	90
Brackenbury Primary	30
Carden Primary	60
Carlton Hill Primary	30
City Academy Whitehawk	60
Coldean Primary	60
Coombe Road Primary	30
Cottesmore St Marys Catholic	60
Downs Infant	90
Downs Junior	96
Elm Grove Primary	60
Fairlight Primary	60
Goldstone Primary	90
Hangleton Primary	60
Hertford Primary	30
Hove Junior School (Holland Road)	64
Hove Junior School (Portland Road)	128
Middle Street Primary	30
Mile Oak Primary	60
Moulsecoomb Primary	30
Our Lady of Lourdes	30
Patcham Infant	90
Patcham Junior	96
Peter Gladwin Primary	30
Queens Park Primary	60
Rudyard Kipling Primary	30
Saltdean Primary	60
St Andrew's CE Primary	90
St Bernadette's Catholic Primary	30
St John The Baptist Catholic Primary	30
St Lukes Primary	90
St Margaret's CE Primary	30
St Mark's CE Primary	30
St Martin's CE Primary	30
St Mary Magdalen Catholic Primary	30
St Mary's Catholic Primary	30
St Nicolas CE Primary	60

St Paul's CE Primary	**30**
Stanford Infant*	**60**
Stanford Junior*	**96**
West Blatchington Primary	**30**
West Hove Infant (Portland Road)	**120**
West Hove Infant (Holland Road)	**60**
Westdene Primary	**60**
Woodingdean Primary	**60**
Secondary Admission Numbers 2026-27	
Name of school	**Planned admission no. 2027-28**
Brighton Aldridge Community Academy	**180**
Blatchington Mill	**330**
Cardinal Newman Catholic	**360**
Dorothy Stringer	**330**
Hove Park	**180**
King's	**180**
Longhill High	**210**
Patcham High	**225**
Portslade Aldridge Community Academy	**220**
Varndean	**300**

*a consultation is underway about merging Stanford Infant & Stanford Junior schools into a Primary School in September 2026 which would be split across the two existing sites and with a PAN of 60 pupils.

Proposed Admission Arrangements for Brighton & Hove Schools 2027/28

Admission Arrangements for Secondary Schools

The Council uses a catchment area system with random allocation being used as the tie breaker in each admission criteria in the event of oversubscription. Cardinal Newman Catholic School, King's School, Brighton Aldridge Community Academy (BACA) and Portslade Aldridge Community Academy (PACA) have their own admission criteria (please visit www.brighton-hove.gov.uk/schooladmissions or the schools' websites for details).

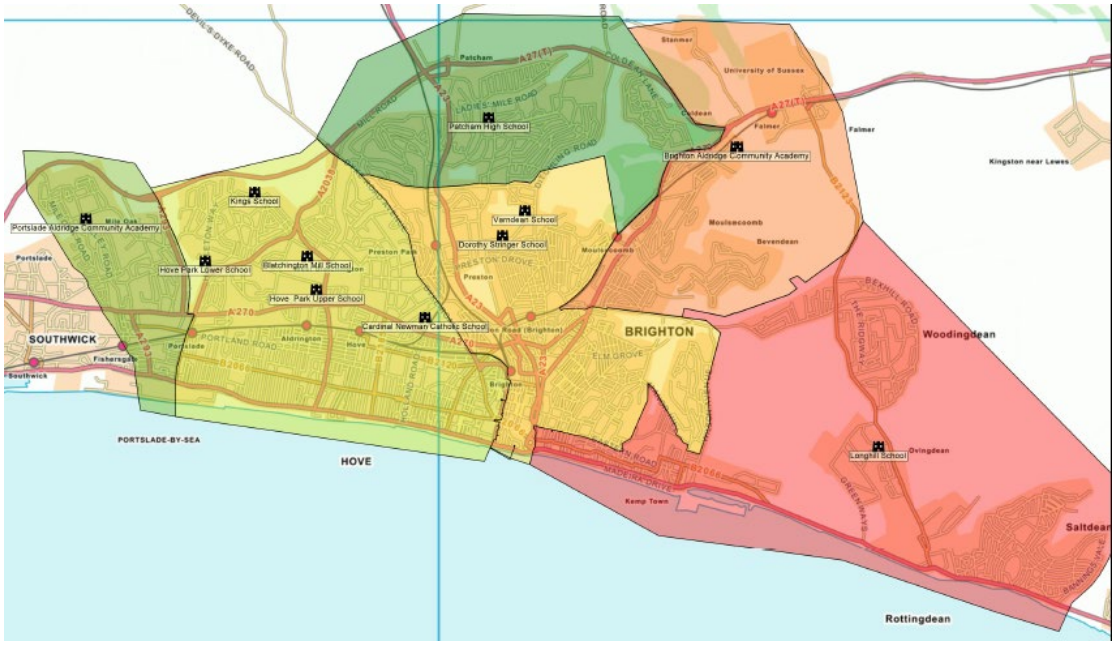
If a school is oversubscribed, after the admission of pupils with an Education, Health and Care Plan where the school is named in the Plan, priority for admission will be given to those children who meet the oversubscription criteria set out below.

The oversubscription criteria are applied in the context of an equal preference system as required by the School Admissions Code. They are:

1. Looked after children and all previously looked after children, including those children who appear (to the council) to have been in state care outside of England and ceased to be in state care as a result of being adopted. (*note a)*
2. Compelling medical or other exceptional reasons for attending the school. (*note b)*
3. Sibling link. (*note c)*
4. Children living within the designated catchment area and eligible for Free School Meals up to the city average. (*note d)*
5. Other children eligible for Free School Meals up to the city average. (*note d)*
6. Children living outside the school's catchment area but within the catchment area for BACA, PACA, Patcham or Longhill up to 5%. (*note g)*
7. Pupils living in the designated catchment area for the school(s).
8. Other children.

Within all these priorities, the tie break is random allocation. (note f)

The catchment areas are set out in the catchment area map below. There is information below (note h) about which postcodes/addresses are in each of the catchment area.



Admissions Arrangements for Community Infant, Junior and Primary Schools

Parents must make a separate application for any transfer from nursery to primary school and from infant to junior school. If a school is oversubscribed, after the admission of pupils with an Education, Health and Care Plan where the school is named in the Plan, priority for admission will be given to those children who meet the oversubscription criteria set out below.

The oversubscription criteria are applied in the context of an equal preference system as required by the Admissions Code. They are:

1. Looked after children and all previously looked after children, including those children who appear (to the council) to have been in state care outside of England and ceased to be in state care as a result of being adopted. (*note a)*
2. Compelling medical or other exceptional reasons for attending the school. (*note b)*
3. Sibling link. (*note c)*
4. For junior schools only: children attending a linked infant school. (*note e)*
5. Other Children.

Within all these criteria, the tie break is home to school distance which will be measured by the shortest route from the child's home to the nearest of the school's gates. This will be measured by specialist computer software based on Ordnance Survey data. It measures using the road network supplied by Ordnance Survey and some other public rights of way which are paved and lit. Routes across public parks or open spaces will not be accepted. When using roads for measurement purposes the computer measures along the middle of the road. It measures from the address point in the property to the nearest point on the road network and from there to the nearest of the school's gates to the child's home. No other measurement systems will be used for school

admissions decisions. Where the home addresses of two or more pupils are an equal distance from the school (e.g. two children living in the same block of flats) and only one place remains available at the school in question, the place will be allocated randomly by computer to one of these pupils. (note f)

Late applications

If an application is returned after the closing date without good reason it will be considered after all the on-time preferences have been dealt with and school places allocated to them.

If there is a good reason for the application being late, such as a recent house move to Brighton & Hove, it will be considered as on-time if it is received by 22 January (Secondary) or 8 March (Infant, Primary & Junior) and is accompanied by independent supporting evidence demonstrating why the form is late, e.g. solicitor's letter confirming exchange of contracts or a recently signed tenancy agreement.

Applications submitted after the closing date listing revised preferences will only be considered from mid-June onwards **unless** there has been a house move. This is to ensure that parents and carers who do this do not gain an unfair advantage over others by having the opportunity to list more than four preferences.

Home Address –

The school admissions team will allocate school places using the address at which a child lives on the closing date for applications 31 October (Secondary) or 15 January (Infant, Primary & Junior) although late changes of address will be considered if proof of address is received by 22 January (Secondary) or 8 March (Infant, Primary & Junior).

Only one address can be used for admission purposes, and this will be taken as the address where the child spends most of their time. Where a child's time is equally divided between addresses, parents must agree which address they would like to be considered for the purposes of the application. In the event of a dispute, in the absence of a relevant court order, the admission authority will make a judgement about which address applies. This will usually be the address where the child is registered with a doctor.

Deferred admission

Children start school in the school year during which they have their fifth birthday. Children are allowed to start full-time in September or can defer admission or attend part-time until they reach compulsory school age. Children become compulsory school age in the term after their fifth birthday. Children whose fifth birthday falls between 1 September and 31 December may defer or attend part time until January. Children whose fifth birthday falls between 1 January and 31 March can defer admission or attend part time until the start of the summer term. Children whose fifth birthday is between 1 April

and 31 August don't become compulsory school age until the following September however they can also defer admission or attend part time until the start of the summer term. Where a place is deferred it will not be given to another child provided the place is taken up by the beginning of the school term following the child's fifth birthday and within the school year that the offer was made.

Parents can request for a 'summer born' child to start school **outside of their normal age group,** and be admitted to reception rather than Year 1 as detailed below.

Admission outside a normal age group

Parents may request that their child is admitted outside their normal age group, for example, if the child is gifted and talented or has experienced problems such as ill health. To do so, parents should include a request with their application, specifying why admission outside the normal age group is being requested and which year group they wish their child to be admitted.

Applications should be accompanied with the additional form to request that the child is educated out of year group. Reasons for the request and any evidence to support the case should be included with the form. Evidence could include: information about the child's personal, social, emotional development and academic development; If relevant, medical history and views of a medical professional; whether the child has previously been educated out of year group and whether the child was born prematurely.

The admission authority will consider each case on its merits taking into account the child's best interests and either agree or refuse the request on that basis. Where the council is the admission authority, the views of the headteacher of each school will be sought before a decision is taken. Parents will be made aware of the outcome of the request for admission out of year group before national offer day and reasons for the decision will be shared with them. Late requests will be considered up until 8 March (Infant, Primary and Junior) or 22 January (Secondary) if there is good reason why the request could not be made by the closing date for applications. Requests made after this date will not be considered until after national offer day.

Waiting lists

The council holds waiting lists for community schools, and the following Academies/Free Schools: Benfield Primary School, Bilingual Primary School, Hangleton Primary School, Moulsecoomb Primary School and West Blatchington Primary School. Parents can request that their child's name is added to the waiting list for any or all of their schools of preference by contacting the school admissions team. Waiting lists are held until 31 December at which point pupils' names will be removed from the list. Parents can keep their child's name on the waiting list for the following term by contacting the admissions team in the last week of each term to request this. Pupils are added to waiting lists according to the oversubscription priorities

listed above (or the schools oversubscription criteria if they are an Academy/Free School) and consequently a pupil's name can move down the list as well as up.
Where the home addresses of two or more pupils at the top of an infant, primary or junior school waiting list are an equal distance from the school (e.g. two children living in the same block of flats) and only one place has become available at the school in question, the place will be allocated randomly by computer to one of these pupils (note f).

Waiting lists for secondary schools are called reallocation pools. Each time the council is able to offer a place, or places at a school with a reallocation pool, the list is re-randomised within each criteria and the place(s) allocated to the child(ren) at the top of the list.

Late applicants will also be added to waiting lists as soon as possible after they apply. Late changes of preference (revised applications) will be added to the waiting list for the new preference as soon as possible from mid-June onwards. The pupil's name will be removed from the waiting list for the previous preferences.

When a pupil is offered a place from a waiting list or reallocation pool before the start of term in September, the school place previously allocated will be withdrawn. However, parents will have 5 days to contact the admissions team to have the previously allocated school place reinstated if they would prefer to continue with this school allocation instead of the reallocation pool offer.

Notes:

a) **Looked after and previously looked after children -** A 'looked after child' is a child who is (i) in the care of a local authority, or (ii) being provided with accommodation by a local authority in the exercise of their social services functions at the time of making an application to a school. Previously looked after children are such children who were adopted (or subject to child arrangements orders or special guardianship orders) immediately following having been looked after and those children who appear (to the council) to have been in state care outside of England and ceased to be in state care as a result of being adopted. A child is regarded as having been in state care outside of England if they were in the care of or were accommodated by a public authority, a religious organisation, or any other provider of care whose sole or main purpose is to benefit society.

b) **Exceptional Circumstances -** This criterion applies to pupils with a specific need that can only be met by one school rather than any other. This could include medical or social reasons that make it essential for the child to attend a particular school. Independent supporting information (this could be a report or an assessment for example that specifies why the child's needs can only be met at one school) must be provided from a professional, for example a doctor, consultant, mental health practitioner, social worker or other professionals working with

the family which makes a compelling case as to why the child's needs can only be met at the preferred school and no other. A medical condition or diagnosis in itself will not automatically result in priority being given. Advice will be sought from a panel of relevant professionals where necessary to determine whether or not the evidence provided is sufficiently compelling to qualify under this category.

c) **Sibling link** - For the purposes of the school admissions process, children are siblings if they share the same main address and live as part of the same household. A sibling link will apply if the sibling will be attending the school in September 2026. Where separate junior and infant schools are linked (see linked Infant/Junior school below), the sibling link will apply across both linked schools the sibling may be at either school and may be older or younger. If two children, of whom one is due to start junior school and the other infant school in the same September, the junior school child's allocation will be done first and a sibling link will count for the infant child. A sibling link is only taken into account if children live at the same main address and the sibling has already been allocated a place at the school. Twins or multiple births do not qualify for the sibling link unless one child has already been offered a place. Where a sibling attends a nursery class on the same school site, or a sixth form it will not be counted as a link for admissions purposes.

d) **Free School Meals** – children will be considered under this criteria if they are eligible for free school meals on the closing date for applications or on the date the application is submitted if it is late or outside the main admission round. The city average will be taken as 30%. The number of places available at each school under criterion 4 will be calculated by applying the city average to the school's PAN and subtracting the number of places offered to pupils eligible for free school meals under criteria 1,2 and 3. The number of places available under criterion 5 will be calculated by applying the city average to the schools PAN and subtracting the number of places offered to pupils eligible for free school meals under criteria 1,2,3 and 4.

e) **Linked infant/Junior Schools -** Children who are attending or have been offered a place at an infant school in the list below will have priority for places at the linked junior school providing the allocation took place by 8 March in the admission year.

Downs Infant - Downs Junior
Patcham Infant - Patcham Junior
Stanford Infant - Stanford Junior**
West Hove Infant Portland Road – Hove Junior Portland Road
West Hove Infant Holland Road - Hove Junior Holland Road

**there is a consultation underway to merge Stanford Infant and Stanford Junior School into an all through primary school in September 2026.

There is no link between West Hove Infant Holland Road and Hove Junior Portland Road, or between West Hove Infant Portland Road and Hove Junior Holland Road.

f) **Random allocation –** Where the random allocation tiebreak is used, every preference is assigned a unique random number by computer. The computer will then list the pupils using this random number. This computer allocation process is audited and overseen by a senior council officer not part of the school admissions team.

g) **Pupils living in single school catchment areas –** places will be offered up to 5% of a school's PAN to pupils living in a single school catchment area i.e. BACA, PACA, Patcham or Longhill. This criterion will not be applied to a preference for Patcham where the home address is in the Patcham catchment area or Longhill where the home address is in the Longhill catchment area.

h) **Catchment area postcode lists:**

Portslade Aldridge Community Academy (PACA):

BN41 2	BN41 1A
BN41 1DY	BN41 1D except Y
BN41 1FX	BN41 1E
BN41 1GR, S, T & U	BN41 1G except R, S, T & U
BN41 1LD, E, F, G & H	BN41 1H
BN41 1N	BN41 1L except D, E,
BN41 1PS	F, G, H
BN41 1RX	BN41 1OH
BN41 1S	BN41 1PB
BN41 1T	Part of BN41 1PH
BN41 1UA, B, Q	BN41 1UY
BN41 1WY	BN41 1WA, B, E & R
BN41 1X	
BN41 1Y	

Brighton Aldridge Community Academy (BACA):

BN2 4	BN1 9P
BN1 9HW	BN1 9Q except B
BN1 9HX	BN1 9R
BN1 9HY	BN1 9S
BN1 9J except S	BN1 9B except A,W,X & Z

Blatchington Mill School / Hove Park School:

BN3
BN1 2
BN1 3*
*Except BN1 3TG (Westcombe)
BN1 3TL (Prestonville Road
north of the railway line - Nos 1-28)
BN1 3TS (York Villas)
BN1 3TT (York Grove)
BN1 3TU (New England Road)
BN1 3TF/3TX (Belmont)
BN1 3TH (Russell Crescent)
BN1 3UG (Prestonville Court)
These are in the DS/Varndean catchment area

Patcham High School:

BN1 5AZ
BN1 5E,F,G,H
BN1 5JD (even numbers only),
BN! 5JE (even numbers only)
BN1 5JH, JJ, JP, JX
BN1 5L except A, B, D, E,
R, S, W
BN1 8
BN1 9A
BN1 9BA
BN1 9B,X,Y,Z
BN1 9D
BN1 9E
BN1 5BQ
BN1 9G
BN1 9HT
BN1 9HU
BN1 9JS
BN1 9QB
BN1 9TN

Tongdean Lane
Addresses in BN1 5JD and BN1 5JE (Tongdean Lane) cross the boundary between the catchment area for Dorothy Stringer / Varndean and the area for Patcham High: Odd numbers are in the area for Dorothy Stringer / Varndean. Even numbers are in the area for Patcham High.

The part of Tongdean Lane which is east of the railway line (ie Windsor Court BN1 5JS and Manhattan Court BN1 6XZ) is in the catchment area for Dorothy Stringer / Varndean.

Dorothy Stringer School / Varndean School:

BN1 1
BN1 3TG (Westcombe)
BN1 3TL (Prestonville Road north of the railway line - Nos 1-28)
BN1 3TS (York Villas)
BN1 3TT (York Grove)
BN1 6
BN1 7
BN2 0 except Y
BN2 3
BN2 5DT & some of Z**

BN1 3TU (New England Rd)
BN1 3TF / X (Belmont)
BN1 3TH (Russell Crescent)
BN1 3UG (Prestonville Court)
BN1 4
BN1 5JS
BN1 5A except Z
BN1 5B, D, N, P, R, S, T
BN1 5JB, JD (odd nos only), JE (odd nos only), JF, JG, JL, JN
BN1 5LA, B, D, E, R, S, W
BN2 5ET & some of F, H & L**
BN2 5F except A, B & G**
BN2 5G except G, H & J**
BN2 5H except A**
BN2 5L except J**
BN2 5N except A, B & S**
BN2 5P except some of A & B**
BN2 5Q**
BN2 5RS**
BN2 5ZG & J**
BN2 9

Tongdean Lane
Addresses in BN1 5JD and BN1 5JE (Tongdean Lane) cross the boundary between the catchment area for Dorothy Stringer / Varndean and the area for Patcham High: Odd numbers are in the area for Dorothy Stringer / Varndean. Even numbers are in the area for Patcham High.

The part of Tongdean Lane which is east of the railway line (ie Windsor Court BN1 5JS and Manhattan Court BN1 6XZ) is in the catchment area for Dorothy Stringer / Varndean.

Addresses in BN2 5DZ, BN2 5EF, BN2 5EH, BN2 5EL and BN2 5PA cross the boundary between the catchment area for Longhill and the area for Varndean/Dorothy Stringer:
BN2 5DZ/BN2 5EF (Manor Way)- even numbers 2-34 are in the Varndean/DS area.
All odd numbers and evens from 36 onwards are in the Longhill area.
BN2 5EH/BN2 5EL (Manor Hill)- odd numbers are in the Longhill area. Even numbers are in the Dorothy Stringer / Varndean area.
BN2 5PA (odd numbers in Wilson Avenue)- 1, 3, 5, 7 & 11 are in the Longhill area. 13 upwards are in the Dorothy Stringer / Varndean area.

NB: addresses on the eastern side of Wilson Avenue (BN2 5PB) are all in the Longhill area.

Longhill High School:

BN2 0Y
BN2 1**
BN2 5A**
BN2 5B**
BN2 5D except T & some of Z**
BN2 5E except T & some of F, H & L**
BN2 5FA, B & G**
BN2 5GG, H & J**
BN2 5HA**
BN2 5R except S**
BN2 5S
BN2 5T
BN2 5U
BN2 5W
BN2 5X
BN2 5Y**
BN2 5Z except G & J**
BN2 6

BN2 5J**
BN2 5LJ**
BN2 5NA, B & S**
Some of BN2 5PA & B**

BN2 7

BN2 8

Addresses in BN2 5DZ, BN2 5EF, BN2 5EH, BN2 5EL and BN2 5PA cross the boundary between the catchment area for Longhill and the area for Varndean/Dorothy Stringer:

BN2 5DZ/BN2 5EF (Manor Way)- even numbers 2-34 are in the Varndean/DS area.
All odd numbers and evens from 36 onwards are in the Longhill area.
BN2 5EH/BN2 5EL (Manor Hill)- odd numbers are in the Longhill area. Even numbers are in the Dorothy Stringer / Varndean area.
BN2 5PA (odd numbers in Wilson Avenue)- 1, 3, 5, 7 & 11 are in the Longhill area. 13 upwards are in the Dorothy Stringer / Varndean area.

NB: addresses on the eastern side of Wilson Avenue (BN2 5PB) are all in the Longhill area.

**Addresses in these areas were in a different catchment areas for 2025-26.

BRIGHTON & HOVE CITY COUNCIL

Scheme for co-ordinated admissions to infant, primary and junior schools – Admissions Year 2027/28 (Admissions to Reception or year 3 of Junior School in September 2027)

Introduction

The main purpose of the co-ordinated scheme is to ensure that every parent of a child living in Brighton & Hove who has completed a school application receives one offer of an infant, primary or junior school place. This will be on a set date following the conclusion of the normal admission round for pupils seeking admission to school. The scheme is designed to foster clear communications on school admissions between the City Council, community schools, Academies (for the purposes of this document Free Schools are included as Academies), and voluntary aided schools which act as their own admission authority, and neighbouring Local Authorities (LAs) and admission authorities. It fulfils the requirements of the School Admissions (Admission Arrangements and Co-ordination of Admission Arrangements (England)) Regulations 2012 and more detailed arrangements set out in the School Admissions Code 2021.

The scheme does not affect the rights of voluntary aided schools and Academies to set their own admission priorities and consider applications on the basis of those priorities. It is intended to set out a process and time scale for the exchange of pupil information between the parties to the scheme, resulting in the offer of a single school place. This should represent a preference listed by the parent /carer following the application of the admission priorities by the Local Authority (LA) or by own admission authority schools. Where it is not possible to allocate a place at any of the preferred schools for a child living in Brighton & Hove, a place will be offered at the nearest school to their home address within the city boundaries with a place available. This will not preclude parents from seeking an alternative place elsewhere if they are unhappy with the offer, nor will it prevent them from lodging an appeal with the admission authority for their preferred school.

All residents of Brighton & Hove should apply using the City Council's common application form (online or paper) even if they are seeking a place at a maintained school in the area of another Council.

The time scales set out in the scheme will be broadly in line with the time scales used by neighbouring LAs. **Please be aware that governing bodies for VA schools and Academies will need to meet between 22 February 2027 and 08 March 2027 when the ranking order needs to be returned to the Local Authority.**

Key dates

- Online application facility available 1 September 2026
- Closing date for applications 15 January 2027
- Preference data exchanged with Voluntary 22 February 2027

aided schools and other LAs.

- Consider qualifying late applications. 08 March 2027
- Voluntary Aided schools provide Council with provisional ranking order of all applicants. 08 March 2027
- Finalise allocations and exchange offer details with neighbouring LAs Between 22-25 March 2027
- Offer details provided to schools 15 April 2027
- Notification e-mails sent to parents, decisions 16 April 2027
- posted to applicants without an email address
- Deadline date for acceptance of places 30 April 2027
- Deadline for acceptance of places and appeals to be heard in the main round. 10 May 2027

Process and detailed time scale – infant, junior and primary schools

1. The school admissions guidance published by the City Council is available online and will be distributed on request to parents/carers applying for infant or primary school places. A publicity campaign will be launched in November 2026 encouraging parents to apply online. Posters will be sent to schools, other council services, early years settings, the press and other media to remind parents of those pupils requiring a school place to apply.

2. Parents/carers will be invited to list 4 preferences for a school place ranked in order of priority. These may be at a city community school, an academy, a free school or a voluntary aided school, or any maintained school outside the City of Brighton & Hove. All residents in the city must use the Brighton & Hove school admission application to indicate their preferred schools, either the paper or online form. No other form of application will be valid. The LA allocates places on the basis of equal preferences, and each preference listed will be prioritised according to the published admission priorities for community and own admission authority schools. If it is possible to offer more than one place based on those priorities, the one ranked higher on the application will be offered.

3. Parents and carers are strongly advised to apply online through the facility available on the Brighton & Hove City Council website. This will provide them with a response which confirms their preference listing and acts as proof of application. Alternatively, the paper form should be completed and returned to their local infant/primary school or to the Admissions Team at Hove Town Hall, Hove **by 15 January 2027.**

4. Where, as part of its admission priorities a voluntary aided school requires additional supporting information, such as a Supplementary Information form, or proof of denominational commitment, that form or proof should be completed and returned to the school by the same closing date. This is to ensure that target dates for the exchange of pupil information and the notification date for parents/carers can be met.

5. Parents are encouraged to apply online however, if using an application form rather than the online application parents and carers are strongly

advised to return their application via a preferred school or email a scanned copy to the council's admission team. Parents who post the form should understand that proof of posting is not proof of receipt, and they will not have confirmation in the same way as those applying online or returning the form to a school. All maintained infant and primary schools in the city will return paper application forms to the LA as they are received, ideally scanned and sent by email. Schools should maintain a record of the date on which each form was received, and if required will provide proof of receipt to the parent/carer. This ensures that on time applications and late applications are clearly recorded as such. It also provides assurance for parents should the school or the LA subsequently mislay the form.

6. **No later than 22 February 2027**
   - ❖ LA will identify the numbers of preferences (first, second, third and fourth) received for each school.
   - ❖ Voluntary aided schools, free schools and academies will be provided with details of parental preferences where their school is given as a preference. They will apply oversubscription criteria to prioritise all preferences. Where pupils have an Education, Health & Care Plan (naming the school) and must be offered a place this will be indicated. These pupils must be given a place at the school in accordance with the SEN and Admissions Code. This applies to all maintained schools and academies.
   - ❖ West and East Sussex and other LA's as necessary will be forwarded the details of preferences expressed for their schools by Brighton & Hove parents/carers. Where the pupil has an Education, Health & Care Plan this will be indicated.
   - ❖ West and East Sussex will be asked to provide a list of pupils living in those areas who have expressed a preference for a Brighton & Hove school.

7. **No later than 8 March 2027**
   - ❖ Voluntary aided schools, free schools and academies will provide the LA with a list showing children in priority order for places at the school. The list will show which oversubscription criterion was applied to each child, and relevant information to apply any necessary tie-break. The school will advise the LA of such additional information as is necessary to inform parents of the reason for its decision when allocation letters and emails are sent on 16 April 2027.
   - ❖ Brighton & Hove will apply its admission priorities to all preferences received for community schools, and where the children are resident in other LAs, will inform that LA.
   - ❖ Consideration will be given to qualifying late applications received before 8 March 2027.

8. **Between 23 and 25 March 2027**
   - ❖ Brighton & Hove will establish whether more than one offer could be made on the basis of the application of its own admission priorities and

those of voluntary aided schools, free schools, academies and other LAs. It will determine in each case which is the highest parental ranking.

- ❖ Final lists of school allocations will be prepared.
- ❖ Emails to parents/carers will be prepared.
- ❖ Discussions will take place with other admission authorities as necessary to resolve any remaining unallocated applications.
- ❖ Neighbouring LAs will be sent final details of children living in their area offered a place at a Brighton & Hove school, and for whom they will need to send allocation letters.

9. 16 April 2026

Online applicants will receive their decisions by e-mail. Letters will be sent only to parents/carers who do not have an email address. The LA email or letter to parents will contain the following:

- ❖ If they have not been allocated a school of preference, the reason why not.
- ❖ How places at the preferred schools were allocated.
- ❖ Where it is an own admission authority school, the fact that the offer is made on behalf of the governing body or academy trust for the school.
- ❖ Where it is a school maintained by another LA, the fact that the offer is made on behalf of that LA.
- ❖ The right of appeal to an independent panel, and how to arrange an appeal for a community school or a voluntary aided school.
- ❖ Details about waiting lists for preferences that could not be met.

10. 30 April 2027

Parents and carers should accept offers of places by this date to allow schools and the LA ample planning time for the new intake. This does not affect their right to appeal if the place they are accepting is not their highest preference.

11. 10 May 2027

Parents should also have exercised their right to appeal by this date if they want to be assured of having their appeal heard in the main round of appeals.

12. Proof of address

The LA may require parents/carers to provide proof of address if they are applying for a community school place. Own admission authority schools may also request proof of address from their applicants.

Appendix A – Changes of address and late applications

New arrivals in the city

Parents/carers moving into the city in the course of the admission process who are making an application based on their new address must provide evidence of either a tenancy agreement of six months or more or an exchange

of contracts if they are purchasing a property. Applicants should where possible, submit their application by the closing date, especially if their move took place before the closing date. Proof of the move should then be provided at the earliest opportunity. If an application is made and evidence of the move provided by 8 March 2027, the application will be considered on-time and included in the main admission round.

Late applications received before 8 March 2026

I. With the exception of families moving into the area and cases as described at V below, applications received after the closing date will not be considered by the LA until allocations have been made for those received before the closing date. Any received for an own admission authority school will be forwarded to the school which will decide whether there is a good reason to include these late applications in the main admission round.

II. Any applications received for community schools in respect of children in care will be included in the main admission round as valid preference at any time up to **25 March 2027**. Where such applications are received after that date, the LA will, if attendance at that school is seen as a necessity for the welfare of the child, seek to offer places at the school ranked highest on the application. If, however, it is acceptable to offer a place at a lower ranked school without going over numbers, the LA will discuss that possibility with the social worker for the child. Applications to voluntary aided schools, free schools and academies received on behalf of children in public care will be considered in line with the published admission policy for each school and the requirements of the School Admission Code.

III. Applications received after the closing date but before the 8 March 2027 will be sent a letter or email allocating a school place on 16 April 2027 or as soon as possible after that date if the volume of late applications is high.

IV. Parents/carers living in the city who change any preference because of a change of address, and who return the new application by **8 March 2027** will have that change considered in the main round of allocations. They will have to provide evidence of their new address. Those applications with evidence received after that date will be considered as late applications.

V. Other late applications where there is a good reason for the delay will be considered in the main round of allocations if received by **8 March 2026** where independent evidence is given by a third party (usually a professional source such as a doctor or social worker) to support the reason for the delay.

Late applications received after 8 March 2027

I. Applications received after 8 March 2027 will be sent an allocation letter or email as soon as possible after 17 May 2027.

II. Where an application is received after the allocation date, from a parent/carer living in the city, they must use the Brighton & Hove online application or paper form. If the preference(s) is for a community school, the LA will allocate a place if the school remains under subscribed. If the school(s) is fully subscribed, a place will be allocated at the nearest school to the home address that has a vacancy. Brighton & Hove will seek to make a decision as soon as possible after receiving the application. Where a preference is given for an own admission authority school or a school in a neighbouring LA, the application will be passed to that admission authority for a decision. They will be asked to reach a decision within fourteen days of receiving the application. Brighton & Hove will endeavour to send a decision to the parent /carer either as soon as possible once it has reached a decision or has been informed of a decision by the other admission authority.

III. If a change of preference is received following the decision letter on **16 April 2027** and the home address has not changed, that changed preference will not be considered until **mid-June 2027**. This allows reasonable time for the consideration of late first applications and the operation of the waiting list where places have been offered and refused.

IV. All applications received after 31 August 2027 will be regarded as outside this admission round and will be considered under the in-year coordinated scheme.

Waiting List

I. Brighton & Hove will operate a waiting list system for its community schools. (Own admission authority schools make their own waiting list arrangements). The waiting list ranking will be based on the LA admission criteria. Rankings within each priority will be determined by home to school distance. Parents will need to request to be placed on the waiting list for community schools and they have the option to ask to go on the waiting list for any or all preference schools. Places will start to be offered from the waiting lists after 17 May 2027. Places will then be offered to children from the waiting list as soon as they become available at an oversubscribed school and the admission criteria have been applied.
II. Where a pupil is allocated a place from a waiting list the school place previously allocated will be withdrawn.
III. The waiting list will operate until the 31 December 2027.
IV. Parents/carers wishing to keep their child's name on the list for longer than the 31 December they must inform the LA. They must renew the waiting list place each term thereafter.

School Admission Appeals

I. Parents/carers wishing to appeal against the LA's decision not to offer a place at a preferred school should do so by **10 May 2027** if they want to be assured of having their appeal heard in the main appeal round.

II. The LA will not arrange an appeal or ask a voluntary aided school to arrange an appeal for a school that was not included on the original application. It will only arrange an appeal for a school which was listed as a preference. If a parent/carer wishes to receive a decision for a school not included in their original application, and thus acquire a right of appeal, they must complete a further application. However, unless there is a good reason for a change of preference this new form will not be considered until **mid-June 2027.**

III. Parents/carers will receive 10 school days' notice of the date of the appeal hearing and will receive copies of any documentation relating to the appeal 7 days in advance of the hearing.

IV. Appeals for on-time applications must be heard within 40 school days of the closing date for appeals to be lodged. The volume of appeals to be heard and the availability of the appeal panel members, who are volunteers, will have a direct effect on the timing of the appeal hearings.

V. Appeals for late applications and school transfers outside the normal admission round will be arranged as soon as practicable after the decision to refuse a preference has been conveyed to the pupil and the parent/carer, and in any case within 30 school days.

BRIGHTON & HOVE CITY COUNCIL

Scheme for co-ordinated admissions to secondary schools – Admissions Year 2027/28 (Admissions to year 7 in September 2027)

Introduction

The main purpose of the co-ordinated scheme is to ensure that every parent of a child living in Brighton & Hove who has completed a school application receives one offer of a secondary school place at the conclusion of the normal admission round for pupils transferring from primary to secondary school. The scheme is designed to foster clear communications on school admissions between the City Council, community schools, Academies (for the purposes of this document Free Schools are included as Academies), Cardinal Newman School, which as a voluntary aided secondary school acts as its own admission authority, and neighbouring Local Authorities (LAs) and admission authorities. It fulfils the requirements of the School Admissions (Admission Arrangements and Co-ordination of Admission Arrangements (England)) Regulations 2012 and more detailed arrangements set out in the School Admissions Code 2021.

The scheme does not affect the rights of the different admission authorities mentioned to set their own admission priorities and consider applications on the basis of those priorities. It is intended to set out a process and time scale for the exchange of pupil information between the parties to the scheme, resulting in the offer of a single school place. This should represent a preference listed by the parent/carer that it is possible to meet following the application of the admission priorities by this LA or by other admission authorities. Where it is not possible to allocate a place at any of the preferred schools for a child living in Brighton & Hove, a place will be offered at the nearest school to their home address within the city boundaries with a place available. This will not preclude parents from seeking an alternative place elsewhere if they are unhappy with the offer, nor will it prevent them from lodging an appeal with the admission authority for their preferred school.

All residents of Brighton & Hove should apply using the City Council's common application form (online or paper) even if they are seeking a place at a maintained school in another Council.

The time scales set out in the scheme work towards the prescribed date (1st March or the first working day following 1st March where it falls at a weekend) on which secondary school place decisions must be notified to parents/carers. It will also be broadly in line with the time scales used by neighbouring LAs.

Key dates

- Online application facility available 1 September 2026
- Provide information for Junior & Primary schools to notify year 6 parents of the need to apply by 18 September 2026
- Closing date for applications 31 October 2026
- Preference data exchanged with own admission authority schools (Cardinal Newman, King's,

BACA & PACA) and neighbouring LAs	30 November 2026
• Own admission authority schools provide LA with provisional ranking order of applicants.	18 December 2026
• Consider qualifying late applications.	22 January 2027
• Finalise allocations and exchange offer details with neighbouring LAs	8 - 12 Feb 2027
• Offer details provided to schools	24 February 2027
• Notification e-mails sent to parents, decisions posted to applicants without an email address	1 March 2027
• Deadline date for acceptance of places	14 March 2027
• Deadline for appeals to be heard in the main round.	12 April 2027

Process and detailed time scale

1. Information about the application process and how to apply will be distributed to parents via primary and junior schools at the beginning of September 2026.
2. Parents/carers will be invited to list 4 preferences for a school place ranked in order of priority. These may be at a city community school, an academy, a free school or a voluntary aided secondary school, or any maintained school outside the City of Brighton & Hove. All residents in the city must use the Brighton & Hove school admission application to indicate their preferred schools, either the paper or online form. No other form of application will be valid. The LA allocates places on the basis of equal preference, and each preference listed will be prioritised in accordance with the published admission priorities for community and own admission authority secondary schools in the city. If it is possible to offer more than one place based on those priorities, the one ranked higher on the application will be offered.

3. Parents and carers are strongly advised to apply online through the facility available on the Brighton & Hove City Council website. Alternatively, the paper form should be completed and returned to the child's primary or junior school in the city, or to the Admissions Team at Hove Town Hall **by 31 October 2026.** Applicants for Cardinal Newman and/or King's School will need to return their supporting information directly to the school as well as submitting an online application or paper form to the Council. If supporting information is returned to the Local Authority, the documents will be shared with these schools.

4. Where, as part of its admission priorities a voluntary aided school, free school or academy within the city or beyond requires additional supporting information, such as a Supplementary Information form, or proof of denominational commitment, that form or proof should be completed and returned to the school by the same closing date. This is to ensure that target dates for the exchange of pupil information between authorities and the notification date for parents/carers can be met.

5. Parents are encouraged to apply online. If using an application form rather than online application parents and carers whose children attend maintained primary schools in the city are strongly advised to return the form via the school or send scanned copies by email to the admissions team. Parents who prefer to post the

form should understand that proof of posting is not proof of receipt, and they will not have confirmation of receipt in the same way as those applying online or returning the form to their child's school. All maintained junior and primary schools in the city will return any secondary paper application forms they receive to the LA as they are received, ideally scanned and sent by email. Schools should maintain a list to record the date on which each form was received, the school preferences, and if required will provide proof of receipt to the parent/carer. This ensures that on time applications and late applications are clearly recorded as such. It also provides assurance for parents should the school or the LA subsequently mislay the form.

No later than 30 November 2026

- LA will identify the number of preferences (first, second, third or fourth) received for each school.
- Own admission authority schools will be provided with details of any parental preference where it gives the school as a preference (first, second, third or fourth) received by the LA. It will apply its oversubscription criteria to prioritise all preferences. Where pupils have an Education Health & Care Plan naming the school and must be offered a place this will be indicated. (These pupils must be given a place at the school in accordance with the SEN and Admissions Codes.)
- West and East Sussex and other LA's as necessary will be forwarded the details of preferences expressed for their schools by Brighton & Hove parents/carers. Where the pupil has an Education, Health & Care Plan this will be indicated.
- West and East Sussex will be asked to provide a list of pupils living in those areas who have expressed a preference for a Brighton & Hove school.

No later than 18 December 2026

- Own admission authority schools will provide the LA with a list showing children in priority order for places at the school. The list will show which admission criterion was applied to each child. The school will advise the LA of such additional information as is necessary to inform parents of the reason for its decision when allocation letters and emails are sent on 1 March 2027.
- Brighton & Hove will apply its admission priorities to all preferences received for community schools, and where the children are resident in other LAs, will inform that LA.

Between 8 and 12 February 2027

- Brighton & Hove will establish whether more than one offer could be made based on the council's admission priorities and those of voluntary aided schools, free schools/academies and other LAs. It will determine in each case which is the highest parental ranking.
- Final lists of school allocations will be prepared.
- Emails and letters to parents/carers will be prepared.
- Consideration will be given to late applications received before 22 January, as set out in Appendix A below.
- Neighbouring LAs will be sent final details of children living in their area offered a place at a Brighton & Hove school, and for whom they will need to send allocation letters.

1 March 2027
Online applicants will receive their decisions by e-mail. Letters will be sent only to parents/carers who do not have an email address. The LA email or letter to parents will contain the following:

- If they have not been allocated a school of preference, the reason why not.
- How places at all Brighton & Hove schools were allocated.
- Where it is an own admission authority school, the fact that the offer is made on behalf of the governing body or academy trust for the school.
- Where it is a school maintained by another LA, the fact that the offer is made on behalf of that LA.
- The right of appeal to an independent panel, and how to arrange an appeal for a community school, a voluntary aided school, and in the case of Academies, Free schools, and schools in other LA's who to contact.
- Details about waiting lists and reallocation pools for preferences that could not be met.

14 March 2027
Parents and carers should accept offers of places by this date to allow schools and the LA ample planning time for the new intake. This does not affect their right to appeal if the place they are accepting is not their highest preference.

12 April 2027
Parents should have exercised their right to appeal by this date if they want to be assured of having their appeal heard in the main round of appeals.

Proof of address
The LA may require parents/carers to provide proof of address if they apply for a place at a community school. Own admission authority schools may also request proof of address from their applicants.

Appendix A – Changes of address and late applications

New arrivals in the city
Parents/carers moving into the city in the course of the admission process who are making an application based on their new address must provide evidence of either a tenancy agreement of six months or more or an exchange of contracts if they are purchasing a property. Applicants should where possible, return their application by the closing date, especially if their move took place before the closing date. Proof of the move should then be provided at the earliest opportunity. If an application is made and evidence of the move provided by 22 January 2027, the application will be considered on-time and included in the main admission round.

Late applications received before the 22 January 2027.
I. With the exception of families moving into the area and cases as described at V below, applications received after the closing date will not be considered by the LA until school allocations have been made for those received by the closing date. Any applications received for own admission authority schools

will be forwarded to the school, which will decide whether to include the application in the main admission round.

II. Any applications for community schools received in respect of children in care will be included in the main admission round as valid first preferences at any time up to the date of **12 February 2027**. Where such applications are received after that date, the LA will, if attendance at that school is seen as a necessity for the welfare of the child, seek to offer places at the school of first preference, if necessary, negotiating with that school to admit beyond the published admission number in order to do so. If, however, it is acceptable to offer a place at a lower ranked school without going over numbers, the LA will discuss that possibility with the social worker for the child. Applications for own admission authority schools and schools in other LA areas for children in care will be considered in line with the admission arrangements for those schools and the requirements of the Admissions Code.

III. Applications received after the closing date but before the 22 January 2027 will be sent a letter or email allocating a school place on 1 March 2027 or as soon as possible after that date if the volume of late applications is high.

IV. Parents/carers living in the city who change a preference because of a change of address within the city, and who submit the new application and evidence of the address change will have that change considered in the main round of allocations if it is received by **22 January 2027**. They will have to provide evidence of the address change. Those applications with evidence received after that date will be considered as late applications.

V. Other late applications where there is good reason for the delay will be considered in the main round of allocations if received by **22 January 2027** where independent evidence is given by a third party (usually a professional source such a doctor or social worker) to support the reason for the delay.

Late applications received after the 22 January 2027.

I. Applications received after 22 January 2027 will be sent a letter or email allocating a school place as soon as possible after 30 April 2027.

II. Where an application is received after 22 January 2027, from a parent/carer living in the city, they must use the Brighton & Hove online application service or paper application form. If the preference(s) is for a community school, the LA will allocate a place if the school remains under subscribed. If the school(s) is fully subscribed, a place will be allocated at the nearest school to the home address that has a vacancy. Brighton & Hove will seek to make a decision as soon as possible after receiving the application. Where a preference is given for a free school, an academy, a voluntary aided school or a school in a neighbouring LA, the application will be passed to that admission authority for a decision. They will be asked to reach a decision within fourteen days of receiving the application. Brighton & Hove will endeavour to send a decision to the parent /carer as soon as possible once it has either reached a decision or been informed of a decision by the other admission authority.

III. If a change of preference or preference order is received following the decision letter on 1 March 2027 and the home address has not changed (and there has been no other relevant change of circumstances), that changed preference will not be considered until mid-June 2027. This allows reasonable time for the consideration of late first applications and the

operation of the reallocation pool where places have been offered and refused.

IV. All applications received after 31 August 2027 will be regarded as in-year applications and outside this admission round.

Re-allocation Pool

I. Brighton & Hove will operate a re-allocation pool system for its community schools. The ranking of re-allocation pools will be based on the Brighton & Hove admission criteria. Parents/carers will be asked to indicate if they also wish to be placed in the re-allocation pool for a preferred school when the allocation emails and letters are sent on 1 March 2027. Places will be offered to children from the pool as soon as a place becomes available at an oversubscribed school and the admission priorities have been applied. When a place is been offered from a reallocation pool any previous school offers will be withdrawn.

II. This LA will notify other LAs as appropriate if it offers a place from the pool at a Brighton & Hove school to a pupil living outside the city.

III. The reallocation pool will operate until the 31 December 2027.

IV. Own admission authority schools (BACA, PACA, Cardinal Newman and Kings) and schools in other local authorities will operate their own waiting list/reallocation arrangements. If they can place a child resident in Brighton & Hove in one of their schools, they are asked to notify this LA at the earliest opportunity.

V. Parents/carers wishing to keep their child's name in the reallocation pool for a community school beyond the 31 December must inform the LA. They must renew the position on the reallocation pool at the end of each term thereafter.

School Admission Appeals

I. Parents/carers wishing to appeal against the LA's or a voluntary aided school's decision not to offer a place at a preferred school should do so in writing or using the online appeal facility by 12 April 2027 if they want to be assured of having their appeal heard in the main appeal round.

II. The LA will not arrange an appeal or ask an own admission authority school to arrange an appeal for a school that was not included on the original application. If a parent/carer wishes to receive a decision for a school not included in their original preferences, and thus acquire a right of appeal, they must complete a further application. However, unless there is a change of address or other change of circumstances leading to the change of preference this new application will not be considered until mid-June 2027.

III. Parents/carers will receive 10 school days' notice of the date of the appeal hearing and will receive copies of any documentation relating to the appeal 7 days in advance of the hearing.

IV. Whilst the City Council, other LAs and the Admission Authorities of Academies and voluntary aided schools will make every effort to hear appeals within 40 school days of the deadline for submitting appeals, as suggested in the Appeals Code, they cannot guarantee this time scale. The volume of appeals to be heard and the availability of the appeal panel members, who are volunteers, will have a direct effect on the timing of the appeal hearings.

V. Appeals for late applications and school transfers outside the normal admission round will be arranged as soon as practicable after the decision to refuse a preference has been conveyed to the parent/carer or if appropriate to the student, and in any case within 30 school days of the appeal being lodged.

Date of Birth / school year	School yr in Sept 2026	Grand Total all planning areas from 2025 data	pupils likely to want a school place based on 90% of GP reg data	Permanent places in Year R in 2026	Surplus places or shortfall of places	Comparison with 2024 data	
All planning Areas						Surplus places or shortfall of places	Number of surplus places have risen
places in each school year from Sept 2026							
places in each school year from Sept 2027							
01 September 15 to 31 August 16	6	2,893	2,604				
01 September 16 to 31 August 17	5	2,741	2,467				
01 September 17 to 31 August 18	4	2,623	2,361				
01 September 18 to 31 August 19	3	2,472	2,225				
01 September 19 to 31 August 20	2	2,409	2,168				
01 September 20 to 31 August 21	1	2,246	2,021	2,550			
01 September 21 to 31 August 22	**R**	2,194	1,975	2,415	440	467	-26
01 September 22 to 31 August 23	**2027**	1,974	1,777	2,430	653	623	31
01 September 23 to 31 August 24	**2028**	2,080	1,872	2,430	558	558	0
01 September 24 to 31 August 25	**2029**	2,054	1,849	2,430	581		

Date of Birth / school year	School yr in Sept 2026	Portslade	Central Hove	West Blatchington and North Hangleton	Central City	Patcham	City East	The Deans	City North	TOTALS
All planning Areas		**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	
places in each school year from Sept 2026		**240**	**630**	**90**	**450**	**150**	**450**	**225**	**180**	**2415**
places in each school year from Sept 2027		**240**	**660**	**90**	**450**	**150**	**450**	**210**	**180**	**2430**
01 September 15 to 31 August 16	6	212	699	112	526	182	425	229	221	2604
01 September 16 to 31 August 17	5	225	636	95	459	162	458	221	211	2467
01 September 17 to 31 August 18	4	221	663	93	455	163	392	192	182	2361
01 September 18 to 31 August 19	3	216	572	103	433	136	394	191	180	2225
01 September 19 to 31 August 20	2	185	573	82	420	143	419	163	183	2168
01 September 20 to 31 August 21	1	185	544	72	416	122	362	150	171	2021
01 September 21 to 31 August 22	**R**	177	541	76	354	135	357	173	162	1975
01 September 22 to 31 August 23	**2027**	158	496	66	354	95	346	129	135	1777
01 September 23 to 31 August 24	**2028**	170	495	58	372	124	386	120	148	1872
01 September 24 to 31 August 25	**2029**	158	536	66	352	92	360	128	157	1849

Percentage of Surplus places

Date of Birth / school year	School year in Sept 2026	Portslade	Central Hove	West Blatchington and North Hangleton	Central City	Patcham	City East	The Deans	City North	TOTALS
All planning Areas		**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	
01 September 14 to 31 August 15	6									
01 September 15 to 31 August 16	5									
01 September 16 to 31 August 17	4									
01 September 17 to 31 August 18	3									
01 September 18 to 31 August 19	2									
01 September 19 to 31 August 20	1									
01 September 20 to 31 August 21	**R**	26%	14%	16%	21%	10%	21%	23%	10%	18%
01 September 21 to 31 August 22	**2027**	34%	25%	27%	21%	37%	23%	39%	25%	27%
01 September 22 to 31 August 23	**2028**	29%	25%	36%	17%	17%	14%	43%	18%	23%
01 September 23 to 31 August 24	**2029**	34%	19%	27%	22%	39%	20%	39%	13%	24%

Date of Birth / school year	School year in Sept 2026	BN41 1	BN41 2				Comparison with 2024 data	
1 Portslade		Benfield Primary St Marys Primary	Brackenbury Primary St Nicolas Primary Mile Oak Primary Peter Gladwin Pri	TOTALS	pupils likely to want a school place based on 90% of GP reg data	Surplus places or shortfall of places	Surplus places or shortfall of places based on 2024 data	Number of surplus places have risen fallen between 2024 and 2025
places in each school year from Sept 2026		**60**	**180**	**240**				
places in each school year from Sept 2027		**60**	**180**	**240**				
01 September 15 to 31 August 16	6	63	172	235	212			
01 September 16 to 31 August 17	5	75	175	250	225			
01 September 17 to 31 August 18	4	77	168	245	221			
01 September 18 to 31 August 19	3	67	173	240	216			
01 September 19 to 31 August 20	2	61	145	206	185			
01 September 20 to 31 August 21	1	67	139	206	185			
01 September 21 to 31 August 22	**R**	57	140	197	177	63	65	-2
01 September 22 to 31 August 23	**2027**	52	123	175	158	83	74	9
01 September 23 to 31 August 24	**2028**	48	141	189	170	70	75	-5
01 September 24 to 31 August 25	**2029**	55	121	176	158	82		

Date of Birth / school year	School year in Sept 2026	BN3 1	BN3 2	BN3 3	BN3 4	BN3 5	BN3 6	BN3 7				Comparison with 2024 data	
2 Central Hove		West Hove Infant @Holland Road Hove Juniors Holland Road Brunswick Primary		St Andrews Primary		West Hove Infant Hove Junior	Cottesmore Primary Bilingual Primary School	Aldrington Primay Goldstone Primary	TOTALS	pupils likely to want a school place based on 90% of GP reg data	Surplus places or shortfall of places	Surplus places or shortfall of places based on 2024 data	Number of surplus places have risen fallen between 2024 and 2025
places in each school year from Sept 2026		**120**		**90**		**120**	**150**	**150**	**630**				
places in each school year from Sept 2027		**150**		**90**		**120**	**150**	**150**	**660**				
01 September 15 to 31 August 16	6	99	40	96	70	165	150	157	777	699			
01 September 16 to 31 August 17	5	71	41	125	92	113	118	147	707	636			
01 September 17 to 31 August 18	4	100	39	107	62	151	137	141	737	663			
01 September 18 to 31 August 19	3	78	40	99	66	117	136	100	636	572			
01 September 19 to 31 August 20	2	81	35	92	72	132	97	128	637	573			
01 September 20 to 31 August 21	1	78	33	86	55	121	116	115	604	544			
01 September 21 to 31 August 22	**R**	67	38	114	67	127	94	94	601	541	89	125	-35
01 September 22 to 31 August 23	**2027**	60	46	95	53	117	79	101	551	496	164	176	-12
01 September 23 to 31 August 24	**2028**	66	53	94	51	116	74	96	550	495	165	154	11
01 September 24 to 31 August 25	**2029**	103	55	114	53	118	57	96	596	536	124		

Date of Birth / school year	School year in Sept 2026	BN3 8				Comparison with 2024 data	
3 West Blatchington and North Hangleton		Hangleton Primary West Blatch Prim	TOTALS	pupils likely to want a school place based on 90% of GP reg data	Surplus places or shortfall of places	Surplus places or shortfall of places based on 2024 data	Number of surplus places have risen fallen between 2024 and 2025
places in each school year from Sept 2026		**90**	**90**				
places in each school year from Sept 2027		**90**	**90**				
01 September 15 to 31 August 16	6	124	124	112			
01 September 16 to 31 August 17	5	105	105	95			
01 September 17 to 31 August 18	4	103	103	93			
01 September 18 to 31 August 19	3	114	114	103			
01 September 19 to 31 August 20	2	91	91	82			
01 September 20 to 31 August 21	1	80	80	72			
01 September 21 to 31 August 22	**R**	84	84	76	14	18	-4
01 September 22 to 31 August 23	**2027**	73	73	66	24	31	-7
01 September 23 to 31 August 24	**2028**	64	64	58	32	31	1
01 September 24 to 31 August 25	**2029**	73	73	66	24		

Date of Birth / school year	School year in Sept 2026	BN1 2	BN1 3	BN1 5	BN1 1	BN1 4	BN1 6	BN1 7				Comparison with 2024 data	
4 Central City			St Mary Mags Prim St Pauls Primary	Stanford Infant Stanford Junior Westdene Primary	Middle Street Primary		Downs Infant Downs Junior Balfour Primary St Bernadettes Pri	Hertford Infant Hertford Junior ~~St Josephs Primary~~	TOTALS	pupils likely to want a school place based on 90% of GP reg data	Surplus places or shortfall of places	Surplus places or shortfall of places based on 2024 data	Number of surplus places have risen fallen between 2024 and 2025
places in each school year from Sept 2026			**60**	**120**	**30**		**210**	**30**	**450**				
places in each school year from Sept 2027			**60**	**120**	**30**		**210**	**30**	**450**				
01 September 15 to 31 August 16	6	28	71	116	13	61	184	111	584	526			
01 September 16 to 31 August 17	5	29	45	108	11	54	173	90	510	459			
01 September 17 to 31 August 18	4	24	76	98	7	40	172	89	506	455			
01 September 18 to 31 August 19	3	20	56	99	6	54	171	75	481	433			
01 September 19 to 31 August 20	2	25	58	96	8	43	147	90	467	420			
01 September 20 to 31 August 21	1	18	57	103	7	43	140	94	462	416			
01 September 21 to 31 August 22	**R**	24	51	76	≤5	26	148	68	393	354	96	77	19
01 September 22 to 31 August 23	**2027**	17	48	86	≤5	43	119	80	393	354	96	69	27
01 September 23 to 31 August 24	**2028**	25	58	67	9	42	146	66	413	372	78	56	22
01 September 24 to 31 August 25	**2029**	19	65	83	9	54	100	61	391	352	98		

Date of Birth / school year	School year in Sept 2026	BN1 8				Comparison with 2024 data	
5 Patcham		Patcham Infant Patcham Junior Carden Primary	TOTALS	pupils likely to want a school place based on 90% of GP reg data	Surplus places or shortfall of places	Surplus places or shortfall of places based on 2024 data	Number of surplus places have risen fallen between 2024 and 2025
places in each school year from Sept 2026		**150**	**150**				
places in each school year from Sept 2027		**150**	**150**				
01 September 15 to 31 August 16	6	202	202	182	-32		
01 September 16 to 31 August 17	5	180	180	162	-12		
01 September 17 to 31 August 18	4	181	181	163	-13		
01 September 18 to 31 August 19	3	151	151	136	14		
01 September 19 to 31 August 20	2	159	159	143	7		
01 September 20 to 31 August 21	1	135	135	122	29		
01 September 21 to 31 August 22	**R**	150	150	135	15	22	-7
01 September 22 to 31 August 23	**2027**	105	105	95	56	58	-3
01 September 23 to 31 August 24	**2028**	138	138	124	26	31	-5
01 September 24 to 31 August 25	**2029**	102	102	92	58		

Date of Birth / school year	School year in Sept 2026	BN2 0	BN2 1	BN2 2	BN2 3	BN2 5	BN2 9				Comparison with 2024 data	
6 City East		Queens Park Pri St John the Baptist Primary			Elm Grove Primary Fairlight Primary St Martins Primary	St Marks Primary City Academy Whitehawk	Carlton Hill Primary St Lukes Primary	TOTALS	pupils likely to want a school place based on 90% of GP reg data	Surplus places or shortfall of places	Surplus places or shortfall of places based on 2024 data	Number of surplus places have risen fallen between 2024 and 2025
places in each school year from Sept 2026		**90**			**150**	**90**	**120**	**450**				
places in each school year from Sept 2027		**90**			**150**	**90**	**120**	**450**				
01 September 15 to 31 August 16	6	60	52	≤5	96	131	133	472	425			
01 September 16 to 31 August 17	5	58	65	≤5	98	155	133	509	458			
01 September 17 to 31 August 18	4	49	44	≤5	75	145	123	436	392			
01 September 18 to 31 August 19	3	39	49	≤5	97	123	130	438	394			
01 September 19 to 31 August 20	2	51	52	≤5	85	149	128	465	419			
01 September 20 to 31 August 21	1	45	38	≤5	84	109	126	402	362			
01 September 21 to 31 August 22	**R**	43	48	≤5	82	117	107	397	357	93	74	19
01 September 22 to 31 August 23	**2027**	34	56	≤5	69	124	101	384	346	104	88	16
01 September 23 to 31 August 24	**2028**	50	54	≤5	95	115	115	429	386	64	68	-4
01 September 24 to 31 August 25	**2029**	35	58	≤5	98	106	103	400	360	90		

Date of Birth / school year	School year in Sept 2026	BN2 6	BN2 7	BN2 8				Comparison with 2024 data	
7 The Deans		Rudyard Kipling Pri Woodingdean Prim	Our Lady of Lourdes Pri St Margarets Pri	Saltdean Primary	TOTALS	pupils likely to want a school place based on 90% of GP reg data	Surplus places or shortfall of places	Surplus places or shortfall of places based on 2024 data	Number of surplus places have risen fallen between 2024 and 2025
places in each school year from Sept 2026		**105**	**60**	**60**	**225**				
places in each school year from Sept 2027		**90**	**60**	**60**	**210**				
01 September 15 to 31 August 16	6	117	37	100	254	229			
01 September 16 to 31 August 17	5	129	32	85	246	221			
01 September 17 to 31 August 18	4	109	30	74	213	192			
01 September 18 to 31 August 19	3	102	33	77	212	191			
01 September 19 to 31 August 20	2	94	19	68	181	163			
01 September 20 to 31 August 21	1	89	22	56	167	150			
01 September 21 to 31 August 22	**R**	96	29	67	192	173	52	60	-8
01 September 22 to 31 August 23	**2027**	72	18	53	143	129	81	95	-14
01 September 23 to 31 August 24	**2028**	61	18	54	133	120	90	108	-18
01 September 24 to 31 August 25	**2029**	74	16	52	142	128	82		

Date of Birth / school year	School year in Sept 2026	BN1 9	BN2 4				Comparison with 2024 data	
8 City North		Coldean Primary	Bevendean Primary Coombe Rd Primary Moulsecoomb Prim	TOTALS	pupils likely to want a school place based on 90% of GP reg data	Surplus places or shortfall of places	Surplus places or shortfall of places based on 2024 data	Number of surplus places have risen fallen between 2024 and 2025
places in each school year from Sept 2026		**60**	**120**	**180**				
places in each school year from Sept 2027		**60**	**120**	**180**				
01 September 15 to 31 August 16	6	60	185	245	221			
01 September 16 to 31 August 17	5	63	171	234	211			
01 September 17 to 31 August 18	4	66	136	202	182			
01 September 18 to 31 August 19	3	60	140	200	180			
01 September 19 to 31 August 20	2	53	150	203	183			
01 September 20 to 31 August 21	1	48	142	190	171			
01 September 21 to 31 August 22	**R**	44	136	180	162	18	27	-9
01 September 22 to 31 August 23	**2027**	35	115	150	135	45	32	13
01 September 23 to 31 August 24	**2028**	44	120	164	148	32	35	-3
01 September 24 to 31 August 25	**2029**	48	126	174	157	23		

Data from Oct 25 school census

Year of secondary entry		school Census by year in Oct 25							Estimated number going to CNCS	Estimated number going to King's	Average
		R	1	2	3	4	5	6			
		2032	2031	2030	2029	2028	2027	2026			
	places available										
PACA catchment	**220**	216	190	256	222	238	221	262			
reduced by 2.46%		211	185	250	217	232	216	256			
adjusted for CNCS & Kings		**173**	**147**	**212**	**179**	**194**	**178**	**218**	25	13	
Surplus/Shortfall of places		**47**	**73**	**8**	**41**	**26**	**42**	**2**			
Number of FSM eligible pupils		45	40	65	66	74	64	80			
% of pupils in catchment area eligible for FSM		**21%**	**21%**	**25%**	**30%**	**31%**	**29%**	**31%**			26%
Hove Park & Blatchingrton Mill catchment area	**510**	622	687	664	726	705	756	741			
reduced by 5.13%		590	652	630	689	669	717	703			
adjusted for CNCS & Kings		**311**	**373**	**351**	**410**	**390**	**438**	**424**	138	141	
Surplus/Shortfall of places		**199**	**137**	**159**	**100**	**120**	**72**	**86**			
Number of FSM eligible pupils		64	114	110	172	155	178	171			
% of pupils in catchment area eligible for FSM		**10%**	**17%**	**17%**	**24%**	**22%**	**24%**	**23%**			19%
Stringer & Varndean catchment area	**630**	595	628	645	631	665	692	705			
reduced by 4.58%		568	599	615	602	635	660	673			
adjusted for CNCS & Kings		**496**	**527**	**543**	**530**	**563**	**588**	**601**	64	8	
Surplus/Shortfall of places		**134**	**103**	**87**	**100**	**67**	**42**	**29**			
Number of FSM eligible pupils		96	156	194	188	205	219	209			
% of pupils in catchment area eligible for FSM		**16%**	**25%**	**30%**	**30%**	**31%**	**32%**	**30%**			27%
Longhill catchment area	**210**	219	282	258	280	298	283	301			
reduced by 23.89%		167	215	196	213	227	215	229	64	3	
adjusted for CNCS & Kings		**100**	**148**	**129**	**146**	**160**	**148**	**162**			
Surplus/Shortfall of places		**110**	**62**	**81**	**64**	**50**	**62**	**48**			
Number of FSM eligible pupils		44	58	61	82	99	92	103			
% of pupils in catchment area eligible for FSM		**20%**	**21%**	**24%**	**29%**	**33%**	**33%**	**34%**			28%
BACA catchment area	**180**	141	160	135	151	179	175	168	27	2	
reduced by 6.52%		132	150	126	141	167	164	157			
adjusted for CNCS & Kings		**103**	**121**	**97**	**112**	**138**	**135**	**128**			
Surplus/Shortfall of places		**77**	**59**	**83**	**68**	**42**	**45**	**52**			
Number of FSM eligible pupils		35	73	58	82	96	104	92			
% of pupils in catchment area eligible for FSM		**25%**	**46%**	**43%**	**54%**	**54%**	**59%**	**55%**			48%
Patcham catchment area	**225**	208	219	214	232	247	251	241			
reduced by 3.03%		202	212	208	225	240	243	234	37	3	
adjusted for CNCS & Kings		**162**	**172**	**168**	**185**	**200**	**203**	**194**			
Surplus/Shortfall of places		**63**	**53**	**57**	**40**	**25**	**22**	**31**			
Number of FSM eligible pupils		21	33	23	52	56	42	54			
% of pupils in catchment area eligible for FSM		**10%**	**15%**	**11%**	**22%**	**23%**	**17%**	**22%**			17%
Total for catchment area Schools	**1975**	1344	1488	1500	1562	1644	1690	1726			
Total for all Schools	**2500**	1869	2013	2025	2087	2169	2215	2251			
Number of surplus places		**631**	**487**	**475**	**413**	**331**	**285**	**249**			
% of surplus places		**25%**	**19%**	**19%**	**17%**	**13%**	**11%**	**10%**			

General Equality Impact Assessment (EIA) Form

Support:

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

For enquiries and further support if the toolkit and guidance do not answer your questions, contact your Equality, Diversity, and Inclusion (EDI) Business Partner as follows:

- Economy, Environment and Culture (EEC) – Chris Brown,
- Families, Children, and Learning (FCL) – Jamarl Billy,
- Governance, People, and Resources (GPR) – Eric Page.
- Health and Adult Social Care (HASC) – Zofia Danin,
- Housing, Neighbourhoods, and Communities (HNC) – Jamarl Billy

Processing Time:

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

Process:

- Once fully completed, submit your EIA to your EDI Business Partner, copying in your Head of Service, Business Improvement Manager (if one exists in your directorate), Equalities inbox, and any other relevant service colleagues to enable EIA communication, tracking and saving.
- When your EIA is reviewed, discussed, and then approved, the EDI Business Partner will assign a reference to it and send the approved EIA form back to you with the EDI Manager or Head of Communities, Equality, and Third Sector (CETS) Service's approval as appropriate.
- Only approved EIAs are to be attached to Committee reports. Unapproved EIAs are invalid.

1. Assessment details

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

Read the EIA toolkit for more information.

Name of activity or proposal being assessed:	**Public consultation on School Admission Arrangements 2027-28**
Directorate:	Families, Children & Wellbeing
Service:	Education and Learning
Team:	School Admissions
Is this a new or existing activity?	Existing – although with some amendments

Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)	Yes – EAI from last year's public consultation on admission arrangements.

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

Responsible Lead Officer:	Richard Barker, Head of Education
Accountable Manager:	Georgina Clarke-Green, Director of Education and Learning
Additional stakeholders collaborating or contributing to this assessment:	Saul Johnston, School Admissions Manager Carolyn Bristow, Service Manager – Policy and Business Support

3. About the activity

Briefly describe the purpose of the activity being assessed

The determination of admission arrangements for community schools in Brighton and Hove to take effect from September 2027.

Following a consultation exercise the Council must determine its arrangements for community primary and secondary schools to establish the process by which school places are allocated. The Council has proposed to make some changes to the existing arrangements, to reduce the Published Admission Number (PAN) at Downs Junior School from 128 to 96 pupils, to reduce the PAN at Rudyard Kipling Primary School from 45 to 30 pupils, to amend the Secondary school admission priority criteria to allow the sibling link to apply regardless of the catchment area where families live and to make some changes to the waiting lists and reallocation pool process.

What are the desired outcomes of the activity?

To ensure that a thorough, robust and sound public consultation takes place to enable Council Members to make an informed decision on the city's admission arrangements by 24 February 2026. The desired outcomes of the changes in school admission arrangements are detailed in the accompanying full council report.

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

Pre-school and school aged children, and their families/carers, across all protected characteristics, could be impacted by the proposed changes, plus schools and their communities in the affected areas.

4. Consultation and engagement

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

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

The Council undertook a formal consultation as part of the statutory process of setting admission arrangements, details of which can be found here. Further details of the combination of meetings, and consultation submissions can be found in the accompanying report.

The consultation hosted on the Council's YourVoice portal was open access, did not requiring pre-registration and remained available throughout the length of the consultation. 344 responses were received this way. Between 65% and 80% of consultees did not respond to the equalities questions with the exact percentage depending upon the specific question. Of those that did 70% described their gender as female and 30% as male. 103 of 344 replies stated the gender they identify with is the same as their sex registered at birth. 10 stated no and the majority did not give an answer. 89 consultees stated that their sexual orientation was best described as heterosexual/straight, 248 preferred not to say, 4 were described as Bisexual and 1 lesbian/gay. 17% of consultees stated that they had no particular religion or belief, 5% stated they were Christian, 3% were atheist and 71% did not answer the question. 16% of consultees stated that they were married, 7% stated that they had never married or registered in a civil partnership. 72% did not offer an answer. 1 consultee stated that they preferred not to say if they have been looked after by a Local Authority, 4 stated that they had been. 248 consultees did not answer the question. In total 3 consultees stated that they had served in either regular or reserve armed forces, 93 answered no to this question. 1 consultee preferred not to say and 246 gave no answer. The Council routinely consults on admission arrangements and has therefore a significant amount of corporate memory and understanding as to the insights this provides.

5. Current data and impact monitoring

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

(State Yes, No, Not Applicable as appropriate)

Age	YES
Disability and inclusive adjustments, coverage under equality act and not	YES
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	YES
Religion, Belief, Spirituality, Faith, or Atheism	NO
Gender Identity and Sex (including non-binary and Intersex people)	NO
Gender Reassignment	NO
Sexual Orientation	NO
Marriage and Civil Partnership	NO
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	NO
Armed Forces Personnel, their families, and Veterans	NO
Expatriates, Migrants, Asylum Seekers, and Refugees	YES
Carers	YES

Looked after children, Care Leavers, Care and fostering experienced people	NO
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	YES
Socio-economic Disadvantage	YES
Homelessness and associated risk and vulnerability	NO
Human Rights	NO
Another relevant group (please specify here and add additional rows as needed)	YES

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

- 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?

The Council is restricted to the information which can be gathered in a common application form when parents apply for a school place. As a result, there is a reliance on using contextual information gathered from termly school census regarding the pupils attending each school that can then be used to inform decisions about secondary school arrangements. This will be at a primary school level but as the city does not operate feeder primary schools to its secondary schools no automatic application of the data can be made. The current secondary data will give the context of each school, but current cohort data may not be representative after changes have been made to admission arrangements for 2025, 2026 and for the proposed changes for 2027.

No equivalent data source is available for those pupils whose application will be to start school in Reception in September 2027.

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

The Council is required to provide some limited information to the DfE on the admission process and to the Office of the Schools Adjudicator on a yearly basis. In addition, the Council will monitor and review the termly census data that provides context to the cohorts attending schools in the city. This process can inform how the admission arrangements for September 2028 may be proposed and determined in an activity that cannot start before 1 October 2026.

6. Impacts

Advisory Note:

- **Impact:**
  - Assessing disproportionate impact means understanding potential negative impact (that may cause direct or indirect discrimination), and then assessing the relevance (that is: the potential effect of your activity on people with protected characteristics) and proportionality (that is: how strong the effect is).
  - These impacts should be identified in the EIA and then re-visited regularly as you review the EIA every 12 to 18 months as applicable to the duration of your activity.
- **SMART Actions mean**: Actions that are (SMART = Specific, Measurable, Achievable, Realistic, T = Time-bound)
- **Cumulative Assessment:** If there is impact on all groups equally, complete **only** the cumulative assessment section.
- **Data analysis and Insights:**
  - In each protected characteristic or group, in answer to the question 'If "YES", what are the positive and negative disproportionate impacts?', describe what you have learnt from your data analysis about disproportionate impacts, stating relevant insights and data sources.
  - Find and use contextual and wide ranges of data analysis (including community feedback) to describe what the disproportionate positive and negative impacts are on different, and intersecting populations impacted by your activity, especially considering for Health inequalities, review guidance and inter-related impacts, and the impact of various identities.
  - For example: If you are doing road works or closures in a particular street or ward – look at a variety of data and do so from various protected characteristic lenses. Understand and analyse what that means for your project and its impact on different types of people, residents, family types and so on. State your understanding of impact in both effect of impact and strength of that effect on those impacted.
- **Data Sources:**
  - **Consider a wide range (including but not limited to):**
    - Census and local intelligence data
    - Service specific data
    - Community consultations
    - Insights from customer feedback including complaints and survey results
    - Lived experiences and qualitative data
    - Joint Strategic Needs Assessment (JSNA) data
    - Health Inequalities data
    - Good practice research
    - National data and reports relevant to the service
    - Workforce, leaver, and recruitment data, surveys, insights
    - Feedback from internal 'staff as residents' consultations
    - Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
    - Insights, gaps, and data analyses on 'who' the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.
- Learn more about the Equality Act 2010 and about our Public Sector Equality Duty.

6.1 Age

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

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

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

The admission arrangements will apply to those due to start primary and secondary school in September 2027 so those born before 31 August 2023 and between 1 September 2016 – 31 August 2017. The most significant impact of the proposed changes in admission arrangements will be for those children, seeking a place in a community secondary school, who live in a particular catchment area and have an older sibling attending an out of catchment school. Their priority for a place will be higher than in previous years should the proposed arrangements be determined. We do not hold data on the number of younger siblings due to start school in September 2027 or the number of single children or eldest siblings due to the start school that year. We have 2394 pupils in the Year 6 cohort who are due to start secondary school in September 2027. Not all of these pupils will require a secondary school in Brighton and Hove and the Council currently forecasts the number of places required to be 2231 places. Of the 1403 responses to the equalities monitoring question about age in last year's consultation, most identified as being in the age range 35- 44 (17.5%), 12.8% were in the 45-54 age range. There was one response from someone aged 0-15 and 5 from those aged 16-24. There were 113 responses to the equalities monitoring question about age in this years consultation, most identified as being in the age range 45-54 (50%), 42% were in the 35- 44 age range and 3% were in the 25-34 age range. There was one response from someone in their 60's and 2 from those aged 70 or older.

6.2 Disability:

Does your analysis indicate a disproportionate impact relating to Disability, considering our anticipatory duty?	YES

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

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

Children with Special Educational Needs and Disabilities (SEND) who have an Education, Health & Care Plan would be placed in a secondary school under the SEND code of Practice by the SEN team and normal admission arrangements and PANs would not apply. Therefore, our attentions in the impact assessment is on children with disabilities but without an Education, Health and Care Plan and disabled consultation responders. We know that parents of children with a disability may have more questions or concerns about their child's school application process. There may also be a need to consider a child's individual circumstances under the 'Exceptional Circumstances' criterion within the admission arrangements. This is for the parent/carer to highlight at the point of application and to provide the necessary supporting documentation. During last year's consultation 27.9% of the responders to the consultation stated that their day-to-day activities were not limited because of health problems or disability. 5.3% stated they were, a little and 1.5% stated yes, a lot. 560 responses answered if any of a list of conditions or illnesses reduced their ability to carry out day to day activities. The highest ranked responses were for mental health condition (94), long standing illness (87) and physical impairment (84). 252 replies stated that they preferred not to say.

In this year's consultation 27% of the responders to the consultation stated that their day-to-day activities were not limited because of health problems or disability. 5.5% stated they were, a little and 12.6% stated yes, a lot. 64.8% if responders did not answer the question. 34 responses answered if they had any of a list of conditions or illnesses or disabilities. The highest ranked responses were for a long-term physical illness (10) responses. A learning difficulty (8), Autism (4), other disability/medical condition (3) and a number of other options received 1 or 2 responses. 261 responses did not answer the question and 49 did not have a health condition.

In the October 2025 census figures collected showed a total of 25.13% of pupils are receiving SEN Support or have an EHCP:

- 18.96% of pupils are receiving SEN Support
- 6.17% of pupils have an EHCP

The changes proposed do not offer any disproportionate negative impact on families affected by disability as a discrete group. We know that disabled parents/carers may also find it more difficult to respond to an online survey, application process or to attend in person or online consultation meetings.

Mainstream community schools are expected to meet the needs of all pupils without an EHCP (as well as many that do) and are required to make reasonable adjustments in line with equality duties.

Where these proposals may impact on pupils with disabilities is where mitigations that are in place to minimise the negative impacts of managing within a community school are affected. For example, being able to be placed with a friendship group or trusted and recognised adults. Or where journeys to secondary school are longer and/or undertaken using public transport.

Where these proposals may impact on parents with disabilities is when the mitigations they have put in place to minimise the impact on their child(ren) in accessing a community school are affected. For example, having their child travel to school over a longer distance or needing public transport, being able to utilise a support network to help manage practical/logistical arrangements and when the combination of having a child attend secondary school impacts on family life.

These factors are likely to have a negative impact when a child's allocation of a school place is either outside of the catchment area or not one of the family's preferred schools. The risk of this occurring will be increased when a child's priority for a school place is affected by changes to the admission arrangements. In the case of these proposals this may affect children living in a catchment area where places allocated to those with a sibling priority to a school out of catchment aera which could mean insufficient places for all children living in the catchment area or when the opportunity to apply for a school outside of the catchment area is restricted by being able to attend that school.

In response to past consultations families have identified that without an EHCP children may be more likely to not receive a place at a catchment area school and those with disabilities will be adversely affected.

Parents with disabilities also identified that they may struggle to make the arrangements required to fulfil their statutory responsibilities to ensure their child attended regularly. This includes ensuring their child's regular attendance at school. Whilst the home to school transport policy can take account of a parent's ability to accompany their child or make their own arrangements, we do not hold data specifically on those whose entitlement to transport was based solely on the parent's disabilities.

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

The EHCP process identifies when a child's SEND requires additional support determined within the content of a statutory document.

Criteria 2 of the admission arrangements allows for priority to be applied where there is supporting evidence to indicate that a child must attend a school because of compelling or exceptional reasons.

After the allocation of a school place, the appeal process, overseen by an independent panel, can examine the reasons as to why a child should be considered for a place at an alternative school and this can be agreed outside of the published arrangements.

The Council has responsibility to ensure pupils receive travel assistance when their needs determine it, in line with statutory guidance and the Council's own home to school transport policy.

All schools are expected to be accessible to all pupils, including those with SEND in line with duties under the Equality Act.
Outside of criteria 2 (which allows the consideration of individual circumstances) the School Admission Code does not allow for consideration to be taken of friendship groups, pupil or parent needs or family logistics in the school admission process.

As per the current arrangements, it is possible that a child with additional needs does not gain a place at a school of preference / at a catchment area school. As above, all community schools in the city are able to support a range of child's needs and so if children do have to attend a school which is not the school of parental preference, they will receive the necessary support.

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.

The common application form does not ask any questions on a child's ethnicity, race or ethnic heritage.

In January 2025, 32% (9,831) of pupils who supplied their data identified as an ethnicity category other than *White British*. This is an increase of 201 pupils since January 2024. The national figure is higher, at 38%* of pupils. The three biggest ethnic groups (other than White British) in Brighton and Hove schools were: White - Other 5.0%, Mixed dual background - Other 3.6% and Mixed dual background - White & Asian 3.3%.

The primary schools with the highest levels of BAME pupils are: St Mary Magdalen's, St Paul's, Queen's Park, St John the Baptist and West Blatchington. The lowest percentage were at Mile Oak, St Nicolas, Rudyard Kipling, Patcham Infant and Peter Gladwin schools.

The highest proportion in secondary schools were at: Blatchington Mill, CNCS and Hove Park. The lowest being at Patcham High, PACA and Longhill.

The admission criteria do not prioritise places in accordance with these characteristics.

The data available for pre-school pupils indicates an increasing percentage of children from Minoritised Ethnic backgrounds for the city in general. There is no comprehensive race/ethnicity data available for the cohort due to start primary school in September 2027.

We know that from the 2025 secondary application round 29.6% of all applications were from ethnically minoritised families and there is no ethnicity information for a further 5.4% of applicants. 21.8% of late school applications were submitted by ethnically minoritised families and for a further 43.7% there is no

ethnicity information. 78.2% of ethnically minoritised families who applied received their first preference school compared to 84.7% of white British families.

In some allocation years a higher percentage of pupils from ethnic minorities apply late or are directed to a school that was not a preference.

There has been an increased percentage of ethnically minoritised respondents who answered the equalities monitoring question in previous consultations about the council's admission arrangements from 19% in 2021 to 22.6% last year and 29% in this year's consultation.

In January 2025, a total of 1504 pupils entitled to FSM had English as an additional language and they have an opportunity to be prioritised for a school place above other groups and therefore can be considered to have a greater priority under the proposed arrangements than currently.

Children with English as a Second Language: There is a concern that the current application guide is complicated and may be difficult for parents with lower educational achievement or those who have English as a second language to understand. They may also apply late for a school place and this would not provide them with the opportunity to benefit from the admission criteria because late applications are handled after all on time applications. The council's English as an Additional Language and Traveller Service (EALTS) responds to the diverse and changing demands of the English as an Additional Language population in primary and secondary schools across the city. The service is aware of the difficulties families may have in understanding and completing school applications and provide support where appropriate. This service also supports Gypsy, Roma, Traveller communities with completing school applications and facilitate engagement with education. The council's school admissions team also provide a range of ways in which parents/carers can seek advice or support from emails, telephone calls and by seeing the team in person at secondary school open events. The information provided on the council's website is designed to be accessible and the text can be translated into a wide range of languages.

In January 2025 17.7% of primary pupils and 14.6% of secondary pupils had language other than English.

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

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

6.5 Gender Identity and Sex:

Does your analysis indicate a disproportionate impact relating to Gender Identity and Sex (including non-binary and intersex people)?	NO

6.6 Gender Reassignment:

Does your analysis indicate a disproportionate impact relating to Gender Reassignment?	NO

6.7 Sexual Orientation:

Does your analysis indicate a disproportionate impact relating to Sexual Orientation?	NO

6.8 Marriage and Civil Partnership:

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

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

Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)?	NO

6.10 Armed Forces Personnel, their families, and Veterans:

Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?	NO

6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

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

If "YES", what are the positive and negative disproportionate impacts?
Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

The common application form does not ask any questions on a child or family's status.

The admission criteria do not prioritise places in accordance with these characteristics. From information gathered about pupils attending primary schools it would be possible to determine the context of a secondary school's catchment area but as parents are not compelled to apply for their catchment area school any examination of a possible outcome is difficult to achieve.

The Council's English as an Additional Language and Traveller Service provides support to certain families where English is an additional language and are able to provide some contextual information as to where there is a need.

The January 2025 Census indicated that in terms of English as an additional language (EAL) the overall percentage increased to 16.4%. The EAL proportion ranges in our schools between 4.5% and 69% and there were 128 distinct languages other than English recorded.

In January 2025 16.4% of pupils were recorded as being EAL. The proportion of pupils in primary schools was 17.7%. The percentage of pupils where parent/carer/self-identified ethnic group is other than White British, Refused or Not Known is 32.2%, the range in the city's schools was between 12.1 % and 82.7%.

The primary schools with the highest proportion of pupils with EAL are: St Mary Magdalen Catholic Primary School, St John the Baptist Catholic Primary School, St Mark's CofE Primary School, St Paul's CofE Primary School and Nursery, Queen's Park Primary School, Brunswick Primary School, Fairlight Primary School, Moulsecoomb Primary School, West Blatchington Primary and Nursery School, St Andrew's CofE Primary School and St Bernadette's Catholic Primary School.

The secondary schools with the highest proportion of EAL pupils are: Hove Park School, CNCS, King's School and Blatchington Mill School.

All community schools are expected to meet the needs of pupils without an EHCP and in many cases when they have an EHCP as well. Schools have access to support and guidance for families with these characteristics.

Of those pupils entitled to FSM and recorded as being EAL they have an opportunity to be prioritised for a secondary school place above other groups and therefore can be considered to have a greater priority under the current arrangements than previously.

Pupils whose special educational needs and disabilities (SEND) needs qualify them for an Education Health and Care Plan (EHCP) are not impacted by the school admission arrangements being consulted upon.

It has been reported that the complexity of the admission arrangements may have a negative impact on those with these characteristics in relation to their ability to read and understand how the admission process would work.

6.12 Carers:

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

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

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

The DfE request schools complete a Young Carer indicator in the spring term census. The Young Carer indicator identifies whether children have been identified as a young carer and if so, by whom.

Section 17ZA of the Children Act 1989 says a young carer is a person under 18 who provides or intends to provide care for another person (which isn't to a contract or voluntary work).

The recording and handling of this information is at school's discretion.
The self-reported total of young carers differs from the school recorded list, as outlined below.
• Primary Phase Self -Reported – 8%
• Primary Phase School Reported – 0.7%
• Secondary Phase Self-Reported – 6.4%
• Secondary Phase School Reported – 1.1%

The January 2025 census stated there was 290 pupils recorded as being Young Carers. 183 are in secondary schools and 107 in primary schools. The highest number of Young Carers in primary school are in Year 6 (39) then Year 5 (36). 77% are recorded as White British and approximately 59% have no SEND. 19 have English as an additional language. The number of Young Carers reported in the school census has risen from 208 in 2023.

Where the admission arrangements may impact on parents with caring responsibilities is when the mitigations they have put in place to minimise the impact on their child(ren) in accessing a community school are affected. For example, having their child travel to school over a longer distance or needing public transport, being able to utilise a support network to help manage practical/logistical arrangements and when the combination of having a child attend secondary school impacts on family life.

These factors are likely to have a negative impact when a child's allocation of a school place is either outside of the catchment area or not one of the family's preferred schools. The risk of this occurring will be increased when a child's priority for a school place is affected by changes to the admission arrangements. In the case of these proposals this may affect children living in a catchment area where places allocated to those with a sibling link who live outside the catchment area resulting in insufficient places for all children living in the catchment area, or when the opportunity to apply for a school outside of the catchment area is restricted by being able to attend that school.

The council's admission criteria 2 for exceptional circumstances could give priority for admission to young carers if there is independent supporting information demonstrating a compelling need for the child to be admitted to a particular school.

Parents with caring responsibilities identified that they may struggle to make the arrangements required to fulfil their statutory responsibilities to ensure their child attended regularly.

349 consultees in last year's consultation stated that they were a carer which was 9% of responses. Consultees were then asked, if 'Yes' was provided to the question about being a carer, who they cared for. 418 replies stated parent and 119 a child with SEN. If they care for more than one person, all that apply could be ticked. We asked people to mark other if none apply.

35 consultees to this year's consultation stated that they were a carer with 13 providing substantial unpaid care, 8 providing regular unpaid care and 9 providing occasional unpaid care and 5 preferred not to say. 233 responders did not answer the question.

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

Does your analysis indicate a disproportionate impact relating to Looked after children, Care Leavers, Care and fostering experienced children and adults (Especially considering for age, ethnicity, language, and various intersections). **Also consider our Corporate Parenting Responsibility in connection to your activity.**	NO

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)	NO

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.

Mainstream community schools are expected to meet the needs of all pupils without an EHCP (as well as many that do) and are required to make reasonable adjustments in line with equality duties thereby providing support to pupils whose circumstances have been affected by domestic and/or sexual abuse and violence survivors, as well as those in vulnerable situations.

Where these arrangements may impact on pupils who face or live within a family that faces these circumstances are where mitigations are in place to minimise the negative impacts of managing within a community school are affected. For example, being able to be placed with a friendship group or trusted and recognised adults. Or where journeys to secondary school are longer and/or undertaken using public transport.

Where these arrangements may impact on parents who have experienced vulnerable situations is when the mitigations they have put in place to minimise the impact on their child(ren) in accessing a community school are affected. For example, having their child travel to school over a longer distance or needing public transport, being able to utilise a support network to help manage practical/logistical arrangements and when the combination of having a child attend secondary school impacts on family life due to their experiences.

These factors may have a negative impact when a child's allocation of a school place is either outside of the catchment area or not one of the family's preferred schools. In the case of these arrangements this may affect children living in a catchment area where places allocated to those with a higher priority mean insufficient places for all children living in the catchment area or when the opportunity to apply for a school outside of the catchment area is restricted by being able to attend that school. Against that for some vulnerable children, especially those in a single school catchment, the arrangements provide an enhanced opportunity to address their vulnerability by giving a prospect of being allocated the school of their choice.

Parents who have experienced vulnerable situations may struggle to make the arrangements required to fulfil their statutory responsibilities to ensure their child attended regularly. Appropriate transport arrangements and support from the school tailored to an understanding of the vulnerabilities and situation of the pupil and their family will assist with his.

Under criteria 2 of the school admission arrangements consideration can be given to exceptional and compelling reasons as to why only one school can meet the needs of a particular child. Those who have experienced children or their families that have experienced vulnerable situations may therefore qualify for consideration under this priority criteria and as such be highly likely to obtain a place at their preferred school, which may well be their catchment school.

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.

The schools proposed as having PAN changes are in different planning areas and serve different communities within in the city. From the January 25 school census: Rudyard Kipling Primary School has 27.2% of pupils within the 10% most deprived areas of Britain and 29.2% of pupils within the 20% most deprived areas of Britain. Downs Junior School has 5.1% of pupils within the 10% most deprived areas of Britain and 11.5% of pupils within the 20% most deprived areas of Britain.

Previous admission consultations and engagement exercises have highlighted that families experiencing socioeconomic disadvantage may have reduced capacity to engage in the consultation process or lobby for their interests compared to more affluent communities. This is compounded by practical concerns such as transportation costs and access to schools outside their immediate neighbourhood. Responses to this consultation need to be considered based on the content not just quantity of replies as some areas in the city due to the nature of the community will provide significantly more replies and in a variety of ways.

The key equity concerns raised included:

- House prices surrounding popular schools becoming inflated, potentially creating barriers for lower-income families.
- Some socio-economic groups being better able to lobby and provide cohesive community responses that may disproportionately influence decision making.
- Some communities may not be adequately represented in public meetings or consultation responses.
- Families who cannot afford to move close to oversubscribed schools could face reduced school choices.
- Concerns around areas being limited to access to lower-performing schools based on geography and socioeconomic factors.
- Financial implications for families, including transport costs, highlighted as potential barriers.

In the October 2025 census figures collected showed a total of 27.6% of pupils were in receipt of Free School Meals in the city.

The School Admission Code only allows limited criteria to be used when forming the oversubscription criteria and elements of the Pupil Premium, including FSM eligibility can be used. The code does not allow any other priority to children according to the occupational, financial or educational status of parents applying.

6.17 Human Rights:

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

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

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

- For example: people belonging to the Gypsy, Roma, and/or Traveller community who are also disabled, LGBTQIA+, older disabled trans and non-binary people, older Black and Racially Minoritised disabled people of faith, young autistic people.
- Also consider wider disadvantaged and intersecting experiences that create exclusion and systemic barriers:
    - People experiencing homelessness
    - People on a low income and people living in the most deprived areas
    - People facing literacy, 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

We need to ensure that children and young people accessing school places are not discriminated against and have the opportunity to access inclusive and high-quality school provision. We need to ensure their families can engage well with the public consultation so that a wider range of voices and experiences are heard and captured.

Reducing the number of surplus school places is necessary to safeguard the whole family of schools in the city and to protect schools from financial difficulties as pupil numbers reduce. Without a reduction in school places there is the real possibility that some schools become unable to operate in a financially efficient way with implications for the quality of education provided and the council's own budget.

The proposed changes to secondary admission arrangements are intended to support opportunities for a greater number of children in the city to attend a school that meets their family needs.

The Council knows that the vast majority of applications are made online and also ensures that parents can make contact with the school admission team as part of the application process. The team regularly attend secondary school open evenings and speak directly to families about the process.

Cumulative effects are likely to be experienced by those whose children have SEND as a result of the impact of managing a child's needs before and after formal schooling together with the demands that schooling itself places on the child. We know that there can be a high correlation between families with children with SEND and socio-economic disadvantage.

Through the analysis the Council needs to be mindful of the impacts on families experiencing multiple forms of disadvantage and the compounding effects of disability, poverty and single parenthood may have. Although no data sources can be used to identify the scale of the impact and the geographical locations of the city where that may be most prevalent.

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)

The Council will seek to ensure its arrangements to consider criteria 2 applications and requests for travel assistance both comply with statutory requirements and ensure that holistic view of the pupil's circumstances can be considered fairly. Criteria 2 applications to be considered by a panel of professionals to ensure greater consistency in decision making which will be monitored and reviewed by the school admissions manager.

Where consideration of families facing multiple disadvantages is made, in addition to considering a clear communication strategy in multiple languages regarding the arrangements in place and the appeals process available to them. This can be achieved through the translation functionality of the councils website, the support of EALTS multilingual staff and the use of other interpreting services.

The Council will continue to explore the appropriate travel assistance provided to families on public transport and other means as necessary to ensure that where there is an impact on a family and pupil not receiving a place at their catchment area school this is supported in line the council's relevant policies. Implications of the changes to the council's admission arrangements for 2026 alongside the proposed changes for 2027 will need to be considered when the school allocation data for these cohorts is available in March/April and when the October school census data is available.

Schools will be supported to ensure that they remain able to meet the need of the children offered places and that careful consideration is made to consider clear metrics to measure the impact that changes in admission arrangements may bring for those starting school in September 2026 and 2027. For this to be feedback to school leaders as well as affected families, with regular review points planned to assess outcomes.

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.

If required after determination, these identified actions will be taken into service business plans to ensure oversight and delivery beyond the report's publication and are in place for September 2027 with the enacting of the agreed policy.

8. Outcome of your assessment

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

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

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

It is not unusual for a Local Authority area to amend and change city-wide admission arrangements and / or changes to catchment areas as demographics and circumstances of a local area changes. It is important that the council are sighted on and take consideration of the implications of those proposed changes, and the EIA plus other implications sections of the attached report will assist them to do so.

There are some aspects of the School Admissions Code that preclude the Council from making additional adjustments to mitigate the impact of its proposals. The system also provides through Criteria

2 and the statutory independent appeal process a pathway for a child or family's individual circumstances to be considered. In the case of the appeal panel this is after the allocation has been made.

The School Admissions Code requires admission authorities to ensure that oversubscription criteria are reasonable, clear, objective, procedurally fair, and comply with all relevant legislation, including equalities legislation. Admission authorities must ensure that their arrangements will not disadvantage unfairly, either directly or indirectly, a child from a particular social or racial group, or a child with a disability or special educational needs. As such, the Council's conclusion is that where there may be disadvantage so others with protected characteristics will also benefit. Therefore, no unfair disadvantage occurs rather the arrangements re-prioritise how the admission arrangements for community secondary schools in Brighton and Hove function.

We do not have full and comprehensive information at this stage of the extent of the impact of changes made to the admission arrangements for 2026-27 however changes for 2027-28 are minimal in comparison. The report details mitigations that can be made to better support families in the city and after its operation in September 2026 more information will be known and as admission arrangements are determined annually it will give the Council an opportunity to reflect and receive feedback on those arrangements in the autumn of 2026 at a time when arrangements for September 2028 will be expected to be consulted upon. This will involve having clear metrics for measuring impact once implemented, regular review points to assess outcomes and implementation of robust mitigation measures for identified negative impacts such as the use of criteria 2, travel assistance and support to school staff to meet the needs of the learners attending their schools. It is also recognised that for all pupils, but especially those pupils and families with protected characteristics, the excellent quality of education and support to which the city aspires should be available to all pupils, irrespective of the school allocated or its location.

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

The recommendation of the EIA is to proceed with caution noting that Council's will often amend and change admission arrangements and/or changes to catchment areas as demographics and circumstances of a local area change.

There are some aspects of the admission arrangements that provide an individual pathway for a child or family's individual circumstances to be considered. In the case of the appeal panel this is after the allocation has been made.

The views heard about the proposals were not unanimous and care needs to be taken to consider where there are complex impacts. Where there may be disadvantage so others with protected characteristics will also benefit and so it can be concluded that no unfair disadvantage occurs.

The most significant impact will be on children seeking a place in a community secondary school who live outside a catchment area but have an older sibling attending the catchment school. Conversely, there may be children living in a catchment area who are unable to secure a catchment area school place if the catchment area does not catch due to the allocation of out of area siblings.

Pupils with SEND who qualify for an Education Health and Care Plan (EHCP) are not impacted by the school admission arrangements being consulted upon. Mainstream community schools are expected to meet the needs of all pupils without an EHCP and are required to make reasonable adjustments in line with equality duties. However the arrangements may negatively impact pupils with disabilities where mitigations in place to minimise the negative impacts of managing within a community school are affected. For example, being placed with a friendship group or trusted adults, or where journeys to secondary school are longer and/or undertaken using public transport.

Concern was expressed that any changes that are determined will need to be clearly explained and any barriers to understanding these will need to be overcome.

Parents with certain protected characteristics may struggle to make the arrangements required to ensure their child attends regularly, especially if the child is allocated a school place outside of the catchment area or not one of the family's preferred schools. The main report covers many of the issues highlighted within this EIA and provides details on further considerations that will be required.

9. Publication

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

This will be published as part of the full council paper for 29 January 2026

10. Directorate and Service Approval

Signatory:	**Name and Job Title:**	**Date:** DD-MMM-YY
Responsible Lead Officer:	Richard Barker, Head of Education	15/01/26
Accountable Manager:	Georgina Clarke-Green, Director of Education and Learning	

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

EDI Review, Actions, and Approval:

Equality Impact Assessment sign-off

EIA Reference number assigned:
For example, HNC##-25-Dec-23-EIA-Home-Energy-Saving-Landlord-Scheme
EDI Business Partner to cross-check against aims of the equality duty, public sector duty and our civic responsibilities the activity considers and refer to relevant internal checklists and guidance prior to recommending sign-off.

Once the EDI Business Partner has considered the equalities impact to provide first level approval for by those submitting the EIA, they will get the EIA signed off and sent to the requester copying the Head of Service, Business Improvement Manager, Equalities inbox, any other service colleagues as appropriate to enable EIA tracking, accountability, and saving for publishing.

Signatory:	**Name:**	**Date:** DD-MMM-YY
EDI Business Partner:	Eric Page	28/12/2025
EDI Manager:		

Notes and recommendations from EDI Business Partner reviewing this assessment:

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

Notes and recommendations (if any) from Head of CETS Service reviewing this assessment:

Brighton & Hove City Council

Council Agenda Item 79

Subject: **Budget Protocol**

Date of meeting: **29 January 2026**

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

Contact Officer: **Name: Anthony Soyinka**
Tel: 01273 291006
Email: Anthony.Soyinka@Brighton-Hove.gov.uk

Ward(s) affected: **All**

For general release

1 Purpose of the report and policy context

1.1 To agree the protocol for setting the council's budget and council tax including proceedings at the February Budget Council meeting of the full Council in order to facilitate the decision-making process.

2 Recommendations

2.1 That the budget protocol outlined in Appendix 1 be approved for use at the Budget Council meeting on the 26 February 2026.

2.2 That the Legal Advice Note as set out at Appendix 2 be noted.

3 Context and background information

3.1 Budget Council is a special meeting of the Authority to set the Council Tax for each year and approve the General Fund and Housing Revenue Account budgets for the year ahead. In order to help councillors with the process and running of the meeting, and provide clarity for members of the public, a protocol has previously been adopted requiring the suspension of Standing Orders in so far as it is required to adhere to the protocol.

3.2 The protocol is being put to the Council ahead of the budget meeting so that all Members can be fully aware of the procedure that will be followed should the protocol be approved. The protocol also proposes that there will be a limitation as to the number of amendments that directly impact the budget proposals ('budget amendments') and a defined timeline for their clearance prior to Budget Council to ensure safe and manageable decision-making.

3.3 The budget proposals are first considered by the Cabinet for recommendation on to Budget Council. Under normal procedure rules amendments can be submitted up to 10:00am on the morning of the day before the meeting. However, in the case of amendments that impact the budget proposals, this is not appropriate as such amendments would be highly likely to be disallowed due to the lack of time to undertake the necessary checks, including by the S151 Chief Financial Officer and Monitoring Officer.

3.4 To further aid the smooth running of the budget and Council Tax setting process, a Legal Advice Note is normally provided to the Budget Council meeting setting out the legal, financial and practical consequences of a

failure or delay in setting the Council Tax. A copy of the advice note is provided at Appendix 2.

4 Analysis and consideration of alternative options

4.1 Without the proposed protocol, the Budget Council meeting will need to follow the usual process for its meetings, and this would prove difficult and lead to potentially lengthy adjournments and points of clarification. As such, the use of the protocol is recommended as has been custom and practice in this authority.

5 Community engagement and consultation

5.1 The Council has provided budget information on its website to inform members of the public how the budget is formulated and set. A 'Budget Simulator' has also been developed to enable members of the public to share their own views of how they would balance the council's budget. This has been provided through the council's 'Your Voice' consultation portal. Further details of consultation and engagement undertaken will be provided in the General Fund and Housing Revenue Account budget reports to Cabinet and Budget Council. The budget proposals will also be shared and discussed at Overview & Scrutiny meetings in February.

6 Conclusion

6.1 The budget protocol has been used successfully at previous budget meetings and it is recommended that this approach is continued in order to ensure clarity of the process for all councillors in advance of the meeting.

7 Financial implications

7.1 There are no direct financial implications as the proposals are aimed at facilitating a smooth but robust procedure for facilitating the budget and Council Tax setting process at the Budget Council.

Finance officer consulted: Haley Woollard Date consulted: 21/01/2026

8 Legal implications

8.1 The legal implications of not setting a budget are outlined in Appendix 2 to the report. The adoption of a clear protocol to support the meeting will assist councillors with the smooth running of the meeting and support the Council to meet its legal obligation to set a budget within the statutory timescales.

Lawyer consulted: Elizabeth Culbert Date consulted: 21/01/2026

9 Equalities implications

9.1 The protocol has been drawn up to enable a full discussion of the budget and for all Members who wish to participate in the debate and budget setting process.

9.2 The budget reports that will be considered at the meetings will include equalities impact assessments as appropriate.

10 Sustainability implications

10.1 The protocol is proposed primarily to ensure the smooth running of the Budget Council meeting and to enable the budget to be set rather than

having to reconvene the meeting on another day which would then have an impact in terms of the resources required for a further meeting.

11 Crime & disorder implications

11.1 There are no crime & disorder implications associate with the report.

12 Public health implications

12.1 There are no public health implications associated with the report.

Supporting Documentation

Appendices:

1. Budget protocol for 26 February 2026 Budget Council meeting
2. Setting a lawful budget for 26 February 2026 Budget Council meeting

Appendix 1

Proposed Budget Protocol 2026/27

1.1 The proposed budget protocol for setting the 2026/27 Council Tax, General Fund and Housing Revenue Account Revenue and Capital Budget is as set out below.

1.2 For Budget Council:

(i) Each recognised political Group shall be allowed a maximum of 4 Budget Amendments.

(ii) All proposed amendments must have been received by finance officers no later than 7 working days before Budget Council (i.e. by 12 noon on Tuesday 17 February 2026).

(iii) All amendments will have had to have been assessed and evaluated by finance officers and the relevant Corporate Director or Director no later than 12 noon 4 working days before Budget Council. (i.e. by close of play Friday 20 February 2026).

(iv) The Chief Executive, S151 Chief Financial Officer and Monitoring Officer will have final sign-off and will not normally allow an amendment where a proposal is not considered to be robust or viable for one of the following reasons:

a. The proposal is legally unsafe and/or carries an exceptionally high risk of non-delivery;

b. There is insufficient evidence or information to assess the potential net saving;

c. The proposal is adding to, or bringing forward, an existing saving without further information as to how this can be achieved;

d. The alternative proposal requires one-off investment, additional organisational capacity, and/or loan financing that cannot be supported;

e. The alternative proposal is beyond the powers and duties of the local authority.

(v) The Mayor will refuse to accept any amendment that has not been “signed off” by the Chief Executive, S151 Chief Financial Officer and Monitoring Officer.

(vi) All amendments will be treated in strictest confidence by finance officers and other such officers that the Chief Executive, S151 Chief Financial Officer or Monitoring Officer need to consult in order to assess and evaluate an amendment. They will not be shared until the designated time detailed in (vii) below.

(vii) All amendments will be shared **at 12noon on Monday 23 February 2026** between the Group Leaders by the Monitoring Officer or their nominated officer (usually the Head of Democratic Services).

(viii) A Whips meeting will be arranged following the sharing of amendments for the afternoon of **Monday 23 February 2026** with the Monitoring Officer and Head of Democratic Services so that any matters relating to

the Budget Council meeting on the 26 February and the recently circulated amendments can be discussed.

(ix) The Chief Executive shall have a “brokering” role if this would appear to facilitate agreement on particular amendments or proposals.

(x) There will be a meeting of Group Leaders (attended by the Chief Executive, the S151 Chief Financial Officer and other relevant officers) **at 3:00pm on Wednesday 25 February 2026** with a view to exploring the potential for any agreement on proposed amendments (i.e. the potential for amendments to be re-packaged as ‘composite’ amendments).

(xi) Any variations to the amendments or any new amendments arising from the Group meetings shall be limited to grouping and repackaging of amendments or other changes providing that they do not, in the opinion of the S151 Chief Financial Officer, involve significant costing or evaluation that cannot reasonably be done within the available timescale.

(xii) In the event that Council fails to set the Council Tax on the 26 February 2026, a further meeting would need to be held prior to 10 March 2026**.**

Appendix 2

Legal Note for All Councillors on the Setting of the Council Tax

Legal, Financial and Practical Consequences of a failure or delay in setting the Council Tax

1 Summary

1.1 The local authority has a legal duty to set a lawful budget in time (in this year, before 11th March 2026).

1.2 Members jointly and severally (collectively and individually) have a fiduciary duty to Council Taxpayers.

1.3 This means they have a duty to facilitate, rather than obstruct, the setting of a lawful budget, a process that requires flexibility and compromise.

1.4 Failure to set a lawful budget in time can lead to a loss of revenue, significant additional administrative costs and reputational damage.

1.5 Failure to set a lawful budget may lead to intervention from the Secretary of State under section 15 of the Local Government Act 1999 (as previously seen in authorities in relation to a failure of governance.)

1.6 It may give rise to personal liability for individual Members for misfeasance in public office, negligence or breach of statutory duty.

1.7 This legal note explains the position in more detail and makes practical suggestions for all Members' consideration and guidance.

2 The Legal Duty

2.1 Section 30(6) of the Local Government Finance Act 1992 provides that the Council has to set its budget before 11 March in the financial year preceding the one in respect of which the budget is set. This means the Council has a duty to set the 2026/27 budget before 11 March 2026.

2.2 If the budget is set after that date, the Act says the failure to set a budget within the deadline does not, in itself, invalidate the budget. However, such delay may have significant financial, administrative and legal implications, including potential individual liability of any Member who contributed to the failure to set a budget.

2.3 Section 66 of the 1992 Act provides that failure to set a Council tax (or delay in setting a Council tax) shall not be challenged except by an application for judicial review. The Secretary of State and any other person with an interest or "standing" may apply for a judicial review.

3 Financial Implications of Delay

3.1 A delay in setting the Council Tax means a delay in collecting the tax due not only to the council, but also the precepting authorities such as the Police, Fire Service and others such as the parish council on whose behalf the council acts as a collection authority.

3.2 The council has a legal duty to provide a range of statutory services (such as children's social care services, adult social care, etc.) and is not absolved from its duty because of the late setting of the tax. It also has to pay the monies due to the precepting authorities (such as Fire Service and the Police) whether or not it collects any Council Tax.

3.3 One significant point that Members need to be aware of is that a delay in setting the budget may affect the council's ability to enter into new agreements with significant financial commitments until and unless the budget is agreed. Otherwise, these would be unfunded commitments and therefore potentially unlawful.

3.4 Even if the Council sets the budget by 10 March but later than the planned February Budget Council meeting, there is still likely to be some disruption to the administrative arrangements (such as printing, posting, delivery of bills) that will have cost implications.

4 Duty to take the advice of the Section 151 Chief Financial Officer

4.1 Sections 25 to 29 of the Local Government Act 2003 impose duties on the council in relation to how it sets and monitors its budget. These provisions require the council to make prudent allowance for the risk and uncertainties in its budget and regularly monitor its finances during the year. The legislation leaves discretion to the council about the allowances to be made and action to be taken.

4.2 Section 25 also requires the Council's Section 151 Chief Financial Officer to make a report to full Council when it is considering its budget and council tax. The report must deal with the robustness of the estimates and the adequacy of the reserves allowed for in the budget proposals, so that members will have authoritative advice available to them when they make their decisions.

4.3 The section requires Members to have regard to the report in making their decisions. Any decision that ignores this advice, including the implications of delay, is potentially challengeable.

5 Section 114 Report and the Prohibition Period

5.1 Section 114 of the Local Government Finance Act 1988 puts an obligation on the Section 151 Officer (the Chief Financial Officer) to issue a report "if it appears to him or her that the expenditure (including proposed expenditure) is likely to exceed the resources (including borrowing) available to the council." He would also be under a similar obligation if he became aware of a course of action which, if pursued, would be unlawful and likely to cause loss or deficiency on the part of the authority. The S151 Officer has to consult the Chief Executive and the Monitoring Officer before considering issuing a S114

report. If it is determined that a report should be issued, the Ministry of Housing, Communities & Local Government must also be consulted before issuing the report.

5.2 If such a report were issued, a copy of it must be sent to the council's external auditor and every Member of the Council. Full Council must consider the report within 21 days at a meeting where it must decide whether it agrees or disagrees with the views contained in the report and what action (if any) it proposes to take. Between the issuing of the report and the day after the meeting ("the probation period") the council is precluded from entering into new agreements involving the incurring of expenditure except in certain limited circumstances where expenditure can be authorised by the S151 Chief Financial Officer. The legislation also provides that during the prohibition period "the course of conduct which led to the report being made shall not be pursued." Failure to take appropriate action in response to such a report may lead to the intervention of the council's auditor.

6 Monitoring Officer Report

6.1 Section 5 of the Local Government & Housing Act 1989 imposes on the Monitoring Officer an obligation similar to that of the S151 Officer with the same consequences if it appears to him/her that what the Council has done or is proposing to do is likely to contravene a rule of law or any code of practice made or approved by or under any enactment or maladministration. The Monitoring Officer is also under a duty to warn Members of the consequences under the Code of Conduct for Members.

6.2 The Section 114 and Section 5 reports may be joint or separate and, if separate, they may be issued concurrently or at different times.

7 Code of Conduct Consequences

7.1 The Localism Act 2011 imposes a duty on Members to abide by the Code of Conduct for Members. In interpreting the Code, regard must be had to the General Principles of Public Life, including the requirement that they should make decisions in accordance with the law.

7.2 Members have an active duty to ensure that the Council sets a lawful budget. Voting against proposals repeatedly, knowing that the result means no lawful budget will be set, is incompatible with Members' obligations under the Code as it is bound to bring the council into disrepute.

8 Personal Liability of Members

8.1 Notwithstanding the abolition of surcharges, if a Member's wilful misconduct is found to have caused loss to the council, the Member may be liable to make good such loss under the principle approved by the House of Lords in *Porter v Magill.1 (2002)*.

8.2 Depending on the exact role played by a Member, and the seriousness of the loss incurred, a Member could, in principle, be guilty of the tort and crime of

misfeasance in public office. The indemnity cover that Members are provided with by the Council does not include actions that constitute an offence or are reckless.

8.3 It is also possible (in theory) for a Member to be liable in negligence and or breach of statutory duty.

8.4 It must be pointed out that one would probably need to prove that what the Member/s were doing was deliberate or reckless and involved persistent failure to facilitate the setting of a lawful budget before it attracts liability of the sort referred to in the preceding paragraphs. The longer the setting of a budget is delayed, and the more repeatedly the Member/s "blocks" the setting of a lawful budget, the more likely for the liability to arise.

9 Intervention by the Secretary of State

9.1 The Local Government Act 1999 imposes a duty on the council "...to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness."

9.2 Section 15 of the Act gives the Secretary of State the power to intervene and take a range of measures. The powers of the Secretary of State are very extensive and include: (a) Directing the council to take any action which he/she considers necessary or expedient to secure its compliance with the requirements of this Part (for example, setting a budget by a specified date); (b) The Secretary of State, or a person nominated by him/her, exercising the council's functions (such as setting the Council tax) for a period specified in the direction or for so long as the Secretary of State considers appropriate, and (c) Requiring the council to comply with any instructions of the Secretary of State or their nominee in relation to the exercise of that function and to provide such assistance as the Secretary of State or their nominee may require for the purpose of exercising the function.

9.3 If the Secretary of State decides to intervene on the issue of setting the Council Tax, he/she need not set the full budget and could, for example, direct the Council to set a budget at a specified Council Tax level by a set date, leaving the council to work out the detailed savings for each service.

9.4 The Secretary of State is expected to exercise the powers after consulting the local authority and it usually follows a report from external auditors, by an inspector appointed by the Secretary of State, by Ofsted or similar body, although this is not a requirement in cases of urgency. The measure is stated to be one of last resort and is, itself, challengeable by way of judicial review. The National Audit Office and External Auditors use certain guidance in deciding whether to refer a local authority to the Secretary of State to use his powers under section 15. These include cases where there are:

- Serious service failures in an authority that could result in danger or harm to the public;

- Persistent failures by an authority to address recommendations made by inspectors or auditors;
- Serious failures in a number of services in an authority, which reveal fundamental weaknesses in an authority's corporate capacity to manage services and make improvements;
- Serious failures in corporate governance arrangements or capacity whether or not there is serious service failure; and
- Other circumstances that demonstrate a serious or persistent failure to comply with the requirements of Part 1 of the Local Government Act 1999, which includes the requirement that authorities make arrangements to secure continuous improvement in the exercise of their functions.

9.5 The Secretary of State has exercised the powers under section 15 by intervening in a number of authorities including Hackney LBC, Doncaster Council, Tower Hamlets LBC, Northamptonshire CC, Thurrock LBC and Liverpool City Council for failure to comply with the best value duty. These same powers would be available to the Secretary of State if he/she is of the view that there is failure on the part of the Council to set a budget expeditiously resulting in or risking financial loss or failure in services.

9.6 It is unlikely that the Secretary of State would intervene and set a budget for the council immediately after the 11 March deadline passes. There is also no certainty that he/she would necessarily do so until matters reach a much more serious point. This is because:

(a) Section 30 (6) of the Local Government Finance Act 1992 provides that failure to set a Council tax by the deadline shall not invalidate the Council Tax;

(b) Section 66 of the Act provides that any failure to set the Council Tax shall not be questioned otherwise than by way of an application for judicial review;

(c) The exercise of the Section 15 powers require a much more serious, systematic and persistent failure of governance. The current financial and other governance and service delivery position of the council is far from approaching the failings identified in those authorities where Section 15 powers have been exercised. The council has not been issued with any Public Interest reports and the latest Annual Report by the External Auditor (2023/24) has not identified any ongoing weaknesses in governance.

9.7 Given the complexity of setting a budget (the Secretary of State will have to do the same calculations and assessments the council has) it is not a straightforward process and it is questionable whether the Secretary of State or a person nominated by them could do it quicker. He/she is more likely to give directions for the council to set its budget by a particular date and take

particular steps and within specified parameters rather than setting it themselves.

10 Reputational damage

10.1 Whatever its political make up or whatever the local challenges, the council has had a strong financial and corporate governance reputation. Failure to set a Council Tax and any intervention by the Secretary of State whether formal, informal or even references to failure to set the tax will have significant adverse impact on the council's reputation locally and nationally. This is not simply a theoretical concept, it has real practical impact in terms of investor confidence, peoples' preparedness to work with the council and even on Council Tax collection rates as residents may see the council as wasteful, procrastinating and/or inefficient. Reputation and credibility is hard to earn but, once lost, can be difficult to regain.

11 Practical Advice to Members

11.1 The council as a corporate body, and Members (both individually and collectively), have a fiduciary duty to Council Taxpayers to avoid doing anything that would result in loss of revenue or failure to deliver services. In addition to Members' legal obligations, they also have the moral and democratic obligation to set the budget on behalf of the people who elected them.

11.2 There is always a tension between Members' desire to vote for what they believe to be the right decision on the one hand and the legal obligation to set a lawful budget on time and avoid any loss to the council on the other. A suggested practical approach would be:

(a) Members should always strive to facilitate, rather than frustrate, the setting of a lawful budget;

(b) If it becomes clear (for example as a result of an initial vote) that there is no majority support for any budget but there is a realistic prospect of such an agreement if Members are given additional time for negotiation, then Members should consider a short adjournment, or adjournment to another day, whichever is more appropriate. This would be informed by the advice from the Chief Executive after checking with Group Leaders, and the advice from the S151 Chief Financial Officer and the Monitoring Officer.

(c) If Members do not consider that an adjournment would resolve the impasse or there has been an adjournment and no agreement reached that could deliver a majority, then officers' advice would be:

i. To identify composite amendments (amendments that have cross party-support) and for all Members to vote for these amendments;

ii. When it comes to the substantive vote, for Members who support the Cabinet proposals (with any composite amendment/s) to vote for the proposal;

iii. For Members who do not support the proposal, but are unable to secure a majority for an alternative/amendment budget, to support the substantive budget as amended, or, at least, abstain.

This would ensure that the Council sets a lawful budget and avoids the damaging legal and practical consequences discussed above as well as keeping the setting of taxes locally and preserve the council's governing reputation.

11.3 The above advice is based on the fact that, unlike other times when a proposal that fails to gain the support of a majority of Members simply falls and the status quo prevails, maintaining the current situation is not an option for setting the budget and Council Tax. In this context, the Cabinet proposals represent the closest lawful option to the status quo.

12 Conclusion

12.1 The Council has a duty to set a lawful budget by 10 March.

12.2 Each Member has an obligation to facilitate, rather than frustrate, the setting of a lawful budget in time.

12.3 Failure to discharge that duty may leave Members at risk of breaking the Code of Conduct for Members and possibly expose them to legal liability.

12.4 It is also possible that, if there is a prolonged delay, the Secretary of State may exercise his/her powers under Section 15 of the Local Government Act 1999 to step in and make the decision or ask another person to do so, which would damage the council's governing reputation.

12.5 If, after all reasonable attempts are made, it is not possible to find a majority support for any budget (i.e. the Council is unable to 'get the budget through') then it is the view of officers that Members' obligations to facilitate the setting of a budget would be best discharged by Members who support the Cabinet recommendations to vote for the recommendations and those who do not support the Cabinet proposals (with composite amendments) to vote for the budget, or at the very least abstain, unless they are in a position to put forward alternative proposals that have majority support.

Council

Agenda Item 80

Subject: **Timetable of Meetings for 2026/27**

Date of meeting: **29 January 2026**

Report of: **Chief Executive**

Contact Officer: **Name: Anthony Soyinka**
Tel: 01273 291006
Email: anthony.soyinka@brighton-hove.gov.uk

Ward(s) affected: **All**

1. Purpose of the report and policy context

1.1 To consider the proposed schedule of meetings for the municipal year 2026/27 (see appendix 1) based on the current meetings timetable.

2. Recommendations

2.1 That the proposed timetable of meetings for the 2026/27 municipal year be agreed; subject to any necessary amendments following changes to the Constitution and/or committees' requirements.

3. Context and background information

3.1 The report outlines the proposed schedule of meetings for 2026/27 and enables Members and members of the public to identify when various meetings are scheduled throughout the year.

4. Analysis and consideration of alternative options

4.1 The proposed timetable for 2026/27 maintains a similar cycle of meetings to those in 2025/26. In summary, the proposals are: -

Full Council:
5 Ordinary Council meetings,
plus the Annual Council and Budget Council 7 meetings in total

Executive
Cabinet: 11 meetings

Regulatory Committees:
Planning: 12 meetings

Audit, Standards & General Purpose:	4 meetings
Licensing:	3 meetings
Sub-Committees:	
Licensing Panels:	As required (avg. 3 per month)
Scrutiny Committees:	
People Overview & Scrutiny:	5 meetings
Place Overview & Scrutiny:	5 meetings
Health Overview & Scrutiny:	4 meetings
Forums/Other Bodies:	
Corporate Parenting Board:	4 meetings
Limited Liability Partnership Board	Quarterly
Partnerships:	
Greater Brighton Economic Board	Quarterly
Health & Wellbeing Board:	4 meetings

4.2 The proposed timetable for 2026/27 provides for a total of 11 Cabinet meetings, 19 committee meetings, 14 Overview & Scrutiny meetings (excluding Task & Finish Groups), 16 partnership and board meetings (see Appendix 1).

5. Governing Principles for the Meetings Timetable

5.1 The following guidelines have been applied in reviewing the meetings timetable:

- As far as possible clashes of meetings have been avoided. However, inevitably, given the constraints of avoiding public/religious holidays and the number of meetings to be accommodated on specific days of the week, there are occasions where there are overlaps of meetings.
- What appear at the moment to be “free” days will be filled by Licensing Panel hearings, any additional Cabinet or Scrutiny meetings required and political group meetings.
- As far as possible meetings have not been scheduled on Fridays.
- As far as possible religious holidays have been avoided, although it has not been possible to keep those weeks completely clear.

5.2 The schedule of Council, Cabinet, Scrutiny and Committee meetings is designed to ensure that:

- Cabinet, Committee and Scrutiny reports can be received without undue delay;

- Consideration of the various plans and strategies to be adopted by Full Council can be accommodated;
- There is scope to accommodate city-wide debates if necessary; and
- Public interest and participation through questions, deputations, petitions and petition debates continues to be facilitated.

5.3 The Cabinet meeting dates are included in Appendix 1 with the meeting start time to be confirmed. The intention is to bring the start time for the meeting forward and this will be confirmed alongside the confirmation in relation to full Council meeting start times.

5.4 The number of Overview & Scrutiny Committees had been increased in the 2025/26 municipal year in accordance with the decision of full Council.

5.5 Whilst every effort will be made to keep meetings on the dates listed there may be a need to alter them, and additional meetings may be required for dedicated debates on key issues or particular plans and strategies.

5.6 As usual, a number of further meetings, which are not part of the Council's formal meetings cycle, have been programmed to meet on a regular basis.

6. Community engagement and consultation

6.1 Lead Members, Corporate Directors and appropriate officers have been consulted on the proposed timetable and appropriate committee and council dates set to meet statutory requirements e.g. Budget Council.

6.2 All Members have been consulted, via a survey, on proposals to alternate the scheduled start times of Full Council meetings. This consultation is ongoing and the timing of full Council meetings will be confirmed by the Head of Democratic Services once the consultation has concluded.

7. Financial implications

7.1 There are no additional financial implications arising from the recommendation in this report. The costs of running the meetings in accordance with the proposed timetable will be met from within existing budgets.

Name of finance officer consulted: Ishemupenyu Chagonda
Date consulted 19/01/2026

8. Legal implications

8.1 The proposed timetable of meetings does not prevent the calling of Special Meetings or the use of Urgency Sub-Committee meetings should circumstances arise. However, it does enable an organized scheduling of meetings to be maintained throughout the municipal year.

8.2 The proposed timetable allows for continued compliance with the Access to Information Procedure Rules set out in Part 3E of the Constitution.

Name of lawyer consulted: Elizabeth Culbert
Date consulted 21 January 2026

9. Equalities implications

9.1 Public attendance and interest is encouraged at Council meetings held in public. Holiday periods are avoided as far as is feasible. Members of the public are invited to attend either in person or online, or if this is not possible, ward Cllrs or others are able to present questions on their behalf at full Council meetings. All arrangements for attendance and submission of items are set out in the Council's Constitution and on the Councils website.

9.2 Meetings will be held in a hybrid format where possible, enabling both in person and virtual public engagement. Where regulations have allowed, for example with Licensing Panels and School Appeals meetings have continued to be held virtually.

10. Sustainability implications

10.1 There are no sustainability implications arising from the report and the ability to have hybrid meetings as reduced the impact on people having to attend in person.

11. Other Implications

11.1 **Crime & disorder implications:**

11.2 There are no direct crime & disorder implications arising from the report, however considerations are taken into account for each meeting, along with risk assessments and security arrangements are put in place accordingly.

11.3 **Public Health Implications:**

11.4 There are no public health implications in the report and all venues to be used have been assessed for access, hearing loops and health and safety measures.

11.5 Corporate / Citywide Implications:

11.6 The scheduling of meetings accommodates the Council priority for open and effective city leadership.

12. Conclusion

12.1 The timetable enables Members and members of the public to identify when various meetings are scheduled throughout the year and for the Council and officers to schedule coordinated and effective decision making.

Supporting Documentation

1. Appendices

1. Proposed timetable of meetings for 2026-2027

BRIGHTON & HOVE CITY COUNCIL

TIMETABLE OF MEETINGS

2026/2027

May 2026

Monday	Tuesday	Wednesday	Thursday	Friday
				1
4 Early May BH	5	6 Planning Committee – 2.00pm	7	8
11	12	13	14 Cabinet - start time TBC	15 Limited Liability Partnership Board – 3.00 pm
18	19	20	21 Annual Council – 4.30 pm	22
25 Spring BH	26 SH	27 SH	28 SH	29 SH

School Holidays: Tue 26 – Fri 29 May 2026

June 2026

Monday	Tuesday	Wednesday	Thursday	Friday
1	2 Corporate Parenting Board – 4.00 pm	3 Planning Committee – 2.00 pm	4	5
8	9 Housing Management Panel – North	10 Housing Management Panel – East	11	12
15	16 Housing Management Panel – Central	17 Housing Management Panel – West	18 Licensing Committee – 3.00 pm	19
22	23 Audit, Standards & GP Committee	24	25 Cabinet - start time TBC	26
29	30			

July 2026

Monday	Tuesday	Wednesday	Thursday	Friday
		1 Planning Committee – 2.00 pm	2	3
6	7 LGA Conference	8 LGA Conference Health Overview & Scrutiny Committee – 4.00 pm	9 LGA Conference	10
13	14 People Overview & Scrutiny – 4.00 pm	15 Greater Brighton Economic Board – 10.00 am	16 Cabinet - start time TBC	17
20	21	22 Place Overview & Scrutiny – 4.00 pm	23 Council – start time TBC	24
27	28 Health & Wellbeing Board – 4.00 pm	29	30	31

School Holidays: Thursday 23rd July – Tuesday 2nd September 2025

August 2026

Monday	Tuesday	Wednesday	Thursday	Friday
3 SH	4 SH	5 SH Planning Committee – 2.00 pm	6 SH	7 SH
10 SH	11 SH	12 SH	13 SH	14 SH
17 SH	18 SH	19 SH	20 SH	21 SH
24 SH	25 SH	26 SH	27 SH	28 SH
31 Summer BH				

School Holidays: August 2026

September 2026

Monday	Tuesday	Wednesday	Thursday	Friday
	1	2 Planning Committee – 2.00 pm	3	4
7	8 Housing Management Panel – North Place Overview & Scrutiny – 4.00pm	9 Housing Management Panel – East	10	11 Limited Liability Partnership Board – 3.00 pm
14	15 Health & Wellbeing Board Housing Management Panel – Central	16 Housing Management Panel – West	17 Cabinet - start time TBC	18
21	22 Audit, Standards & GP Committee	23 Corporate Parenting Board – 4.00 pm	24 Council – start time TBC	25
28	29 People Overview & Scrutiny – 4.00 pm	30		

October 2026

Monday	Tuesday	Wednesday	Thursday	Friday
			1	2
5	6	7 Planning Committee – 2.00 pm	8 Licensing Committee – 3.00 pm	9
12	13	14	15 Cabinet - start time TBC	16
19	20	21 Greater Brighton Economic Board	22	23
26 SH	27 SH	28 SH	29 SH	30 SH

School Holidays: Mon 26 – Fri 30 Oct 2026

November 2026

Monday	Tuesday	Wednesday	Thursday	Friday
2	3 Place Overview & Scrutiny	4 Planning Committee – 2.00 pm	5	6
9	10 People Overview & Scrutiny – 4.00 pm	11	12 Cabinet - start time TBC	13 Limited Liability Partnership Board – 3.00 pm
16	17 Corporate Parenting Board – 4.00 pm Housing Management Panel – North	18 Health Overview & Scrutiny Committee – 4.00 pm Housing Management Panel – East	19	20
23	24 Housing Management Panel – Central	25 Housing Management Panel – West	26 Council – start time TBC	27
30				

December 2026

Monday	Tuesday	Wednesday	Thursday	Friday
	1	2 Planning Committee – 2.00 pm	3	4
7	8	9	10 Cabinet - start time TBC	11
14	15 Health & Wellbeing Board	16	17	18
21 SH	22 SH	23 SH	24 SH	25 Christmas Day BH SH
28 Boxing Day (substitute) BH SH	29 SH	30 SH	31 SH	

School Holidays: Mon 21 Dec 2026 – Fri 1 Jan 2027

January 2027

Monday	Tuesday	Wednesday	Thursday	Friday
				1 New Year's Day BH SH
4	5	6 Planning Committee – 2.00 pm	7	8
11	12	13	14	15
18	19	20 Place Overview & Scrutiny	21 Cabinet - start time TBC	22
25	26 Audit, Standards & GP Committee – 4.00 pm	27 Greater Brighton Economic Board – 10.00 am People Overview & Scrutiny – 4.00 pm	28 Council – start time TBC	29

February 2027

Monday	Tuesday	Wednesday	Thursday	Friday
1	2	3 Planning Committee – 2.00 pm	4 Licensing Committee – 3.00 pm	5
8	9 Corporate Parenting Board – 4.00 pm	10 Health Overview & Scrutiny Committee – 4.00 pm	11 Cabinet - start time TBC	12 Limited Liability Partnership Board – 3.00 pm
15 SH	16 SH	17 SH	18 SH	19 SH
22	23	24	25 Budget Council – start time TBC	26

School Holidays: Mon 15 – Fri 19 Feb 2027

March 2027

Monday	Tuesday	Wednesday	Thursday	Friday
1	2 Health & Wellbeing Board	3 Planning Committee – 2.00 pm	4	5
8	9 Housing Management Panel – North	10 Housing Management Panel – East	11	12
15	16 People Overview & Scrutiny – 4.00 pm Housing Management Panel – Central	17 Housing Management Panel – West	18 Cabinet - start time TBC	19
22	23 Place Overview & Scrutiny – 4.00 pm	24 Greater Brighton Economic Board – 10.00 am	25 Council – start time TBC	26 Good Friday BH
29 Easter Monday BH SH	30 SH	31 SH		

Easter break: Mon 29 Mar – Fri 9 Apr 2027 (continues in April)

April 2027

Monday	Tuesday	Wednesday	Thursday	Friday
			1 SH	2 SH
5 SH	6 SH	7 Planning Committee – 2.00 pm SH	8 SH	9 SH
12	13	14	15	16
19	20 Audit, Standards & GP Committee – 4.00 pm	21	22 Cabinet - start time TBC	23
26	27	28 Health Overview & Scrutiny Committee – 4.00 pm	29	30

Easter break continues: Mon 29 Mar – Fri 9 Apr 2027

May 2027

Monday	Tuesday	Wednesday	Thursday	Friday
3 Early May BH	4	5	6 Local Elections	7
10	11	12	13	14
17	18	19	20	21
24	25	26	27 Annual Council – start time TBC	28
31 Spring BH SH				

School Holidays: Mon 31 May – Fri 4 Jun 2027

Brighton & Hove City Council

Council Agenda Item 80

Subject: **Our City Transport Plan 2035**

Date of meeting: **29 January 2026**

Report of: **Director of Governance and Law**

Contact Officer: **Name: Anthony Soyinka**
Email: anthony.soyinka@brighton-hove.gov.uk

Ward(s) affected: **All**

For general release

1. Action Required of Council:

1.1 That the report and recommendations of Cabinet be approved, and that the extract of the Draft Minutes from the Cabinet meeting held on 11 December 2025 be noted.

2. Recommendations:

2.1 Council agrees to adopt Our City Transport Plan 2035 (Appendix 1) as the city's over-arching transport policy.

Brighton & Hove City Council

Cabinet

Agenda Item 87

Subject: **Our City Transport Plan 2035**

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

Report of: **Cabinet Member for Transport & City Infrastructure**

Lead Officer: **Alison Mcmanamon, Corporate Director- City Operations**

Contact Officer: **Name: Andrew Westwood**

Email: Andrew.Westwood@Brighton-hove.gov.uk

Ward(s) affected: All Wards

Key Decision: Yes

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

For general release

1. Purpose of the report and policy context

1.1 This report updates members on the development of Our City Transport Plan 2035, with a focus on the changes made to the draft document following public consultation. The adoption of Our City Transport Plan 2035 as a council policy will deliver on a commitment made in the Council Plan 2023-27, to develop and launch a new ten-year strategy setting out a long-term vision for the city's transport network and a pipeline of transport projects to deliver this vision.

1.2 The English Devolution and Community Empowerment Bill, currently being debated in Parliament, once made law, will create a Mayoral Strategic Authority covering Brighton & Hove and the wider Sussex region. The Mayoral Strategic Authority will be in place by May 2026. The Act will also transfer responsibility for creating a 'Local Transport Plan' from Brighton & Hove City Council to the Mayoral Strategic Authority. Our City Transport Plan 2035 will act as a tool to communicate what Brighton & Hove's transport needs are to the Mayoral Strategic Authority, our residents and stakeholders.

2. Recommendations

2.1 Cabinet agrees to adopt Our City Transport Plan 2035 (Appendix 1) as the city's over-arching transport policy.

3. Context and background information

3.1 Development of Our City Transport Plan 2035 started four years ago with the preparation of a document called 'Developing a new Transport Plan for

Brighton & Hove'. A public consultation on this document was held in autumn 2021, the results of which were reported to the Environment, Transport & Sustainability Committee in March 2022. This policy development was timed to coincide with the planned release of updated guidance on preparing Local Transport Plans from the Secretary of State.

3.2 Changes in Government led to a delay in the publication of the guidance. In response the council paused work on transport policy development. But as the council's existing long-term transport strategy (Local Transport Plan 4) became increasingly in need of an update, work resumed on the new strategy. Our long-term transport strategy is the basis of our annual transport capital investment programme so needs to be current.

3.3 Our City Transport Plan 2035 was aligned with national transport policies and made use of tools developed for local transport authorities. For example, the impact our policies will have on carbon emissions has been assessed using a Carbon Assessment Playbook developed by Transport for the South East (TfSE). This is because the DfT policy 'Decarbonising Transport' made a commitment to 'drive decarbonisation and transport improvements at a local level by making quantifiable carbon reductions a fundamental part of local transport planning and funding'.

3.4 The draft version of Our City Transport Plan 2035 was based on the document 'Developing a new Transport Plan for Brighton & Hove'. Changes were made to align it with subsequent council policies, such as the Council Plan 2023 - 2027 outcomes and the Accessible City Strategy. A detailed evidence base, provided in Appendix 2, was also produced to support the development of the plan. The vision it seeks to deliver is for **getting around a cleaner, fairer and growing city**.

3.5 The draft plan identified five key challenges the city faces. It sets out six objectives to address these challenges and deliver the plan's vision. It also contains a short-term delivery plan of schemes. These are summarised below. Where text is in red, this highlights changes from the draft document that was consulted on.

1	Enabling more people to live safer, healthier and more active lives
2	Reducing congestion ~~Improving the flow of traffic~~ on our roads.
3	Supporting the transition to zero and ultra-low emission transport
4	Creating a transport network that is more inclusive
5	Maintaining our roads and managing them as efficiently as possible

Table 1: Challenges identified in our City Transport Plan 2035

1	Increase public transport use
2	Enable the uptake and use of zero and ultra-low emission ~~vehicles~~ transport
3	Deliver a safe, inclusive and integrated transport system
4	Create well-maintained streets, pavements and rights of way
5	Provide active travel choices for all and excellent public spaces
6	Promote and use technology to reduce and manage travel

Table 2: Objectives of Our City Transport Plan 2035

Figure 1: Summary of capital projects and ongoing works proposed in Our City Transport Plan 2035

3.6 The consultation results indicate broad support for the challenges and objectives. They remain largely unchanged, although the challenge of 'Improving the flow of traffic on our roads' has been amended to 'Reducing congestion on our roads' to make it clear that congestion is the issue that needs to be tackled.

3.7 Other changes that have been made in response to feedback received during the consultation are:

- Creation of a new scheme ‘Improving the look and feel of the city’. This will increase the amount of funding spent on delivering improved pavements and roads, which was the best supported objective.
- Providing greater detail of what is planned around the objective of ’Promote and use technology to reduce and manage travel’, given this was the least supported objective.
- A new commitment to publishing a streetscape design guide. This will address issues around the consistency and standards of street works, cover accessibility standards and set out when new street trees will be introduced and what climate change mitigation is appropriate to be introduced.
- Additional detail, on areas such as rail, powered two wheelers, e-scooters and parking policy.
- Including an indicatively costed 3-year delivery plan, based on the current transport capital programme (noting that the programme is approved annually and subject to future funding availability and cabinet decisions).

3.8 All schemes included in the draft plan remain in the final version. Notable schemes include the ambition to create strategic mobility hubs on the edge of the city. A core part of any mobility hub would be provision of Park & Ride, which will reduce the need to drive into the city and alleviate congestion in the city centre. There is also the ambition to deliver a Sussex Coast Mass Rapid Transit system. This would be a high-capacity public transportation system designed to move large numbers of people efficiently across Brighton, Hove and neighboring coastal towns.

3.9 The plan also commits to developing a road safety action plan to focus on actions that will reduce the number of people killed and seriously injured on our roads.

4. Analysis and consideration of alternative options

4.1 There is a statutory duty to ensure the council has a robust and evidence-based transport strategy, which in future will allow us to effectively engage with the new Mayoral Strategic Authority as the statutory duty for a Local Transport Plan will sit at mayoral level. While the policies within Our City Transport Plan 2035 must conform with national and regional policies there is scope within this for alternative schemes, than those chosen, to be taken forward.

4.2 As part of the assessment of the emissions reductions impact the policies will result in alternative scenarios have been looked at using the Carbon Assessment Tool. The three most effective measures to reduce emissions would be cordon based charges & restrictions, provision of EV infrastructure and road user charging and tolls.

4.3 In order to provide equitable choices for local journeys, measures within the plan allow people to choose the mode of transport that suits them best and

have a strong focus on improving accessibility for all. Measures which place access restrictions on motor vehicles, such as zero emission zones, have not been included within this plan. Currently zero emission vehicles are more expensive to purchase so large-scale restriction-based measures that favour these vehicles are not included in the plan.

5. Community engagement and consultation

5.1 Public consultation on developing a new long term transport strategy for the city was first undertaken in 2021. The council published and sought views on a document termed 'Developing a New Transport Plan for Brighton & Hove'. The results of this consultation were reported to Environment, Transport & Sustainability Committee on 15 March 2022.

5.2 National government had announced that they would issue new guidance for local authorities on how to develop new Local Transport Plans by spring 2022[1]. This publication date was pushed back, and we paused development of our transport policy to await the publication until it became clear that the delay could be indefinite. We drafted Our City Transport Plan and held a 12-week public consultation on it between 18 June 2025 and 12 September 2025.

5.3 The consultation was carried out in line with the Community Engagement framework, ensuring:

- Evidence-based proposals, supported by data.
- Inclusivity, engaging a wide range of residents and groups.
- Clarity of purpose, with clear explanations of why input was sought.
- Timing & resources, with a full 12-week consultation period and tailored activities for different groups, including young people.
- Accessibility, though multiple formats and venues.
- Communication & partnership, with feedback shared openly with stakeholders.

5.4 The main channel for the consultation was a survey hosted on the council's consultation platform, Your Voice. This was promoted through the council's website and social media, posters in community venues and direct contact with stakeholder groups. There were also multiple opportunities for people to speak directly with officers. These included:

- 1 a week-long public exhibition and 7 public drop-in sessions held in libraries.
- 11 workshops/ meetings with stakeholders including five schools, and stakeholder groups including the Transport & Travel Partnership, the Local Access Forum and the Destination Experience Group.
- A dedicated session with the Get Involved Group (organised by Possability People) to gather feedback from disabled people.
- 500 responses via the Your Voice online survey (paper copies were also available).

[1] The Transport Network

5.5 Views were sought on whether the challenges identified in the plan were ones that people agreed were the priority to focus on and whether the objectives in the plan were supported. As detailed in the consultation report in appendix 3. There was over 70% support for each of the challenges. Support for the objectives ranged from 48% - 73%, with support strongest for “well-maintained streets” and “providing active travel choices for all and excellent public spaces”.

5.6 The public were also invited to rank project priorities. “Subsidising public transport to make it more affordable” and “Improving priority routes for active travel (walking, wheeling and cycling)” received the strongest support which aligns with the headline survey results, while “Installing electric vehicle chargepoints” and “New transport hubs at the city’s edge offering Park & Ride, EV charging, vehicle hire and help reduce city trunk traffic” received the least.

5.7 The public were able to provide their additional comments in the online survey. Below are the themes raised the most which are also consistent with the above results.

- Concerns about bus affordability, frequency, and reliability
- Traffic congestion, particularly in the city centre
- Strong calls for better road and pavement maintenance
- Support for active travel and safer cycling routes
- A view that EVs alone won’t solve congestion or wider environmental challenges
- Interest in Park & Ride and mass rapid transit schemes
- Desire to reduce car use and overall traffic levels

5.8 This feedback was used to inform amendments to the draft document, along with comments provided by members of the Overview & Scrutiny Committee, who reviewed the plan at their meeting in October 2025.

6. Financial implications

6.1 Having an agreed long term City Transport plan is required to qualify for the significant sums of external funding needed to implement the proposals outlined in the plan. While there are ambitious schemes proposed within the plan, it is anticipated that with the plan agreed the service would be able develop a business case for each one and secure the grant required.

6.2 There are no direct financial implications arising from this report, all funding levels included in the plan are indicative. The purpose of this report is to enable future schemes to be considered for submission as part of the transport capital program. Each of those proposals will have their own reports issued clearly setting out the business case to confirm the budget implications for each scheme once the level of external grant funding is known.

Name of finance officer consulted: David Wilder Date: 19/11/2025

7. Legal implications

7.1 While this plan followed extant guidance and requirements relating to preparing a Local Transport Plan, It is understood that beyond May 2026 it will not be considered a Local Transport Plan, as defined by the Transport Act 2000 (subsequently amended by the Local Transport Act 2008) because the English Devolution and Community Empowerment Bill, once made law, will transfer responsibility for creating a 'Local Transport Plan' from Brighton & Hove City Council to the Mayoral Strategic Authority.

7.2 This report is asking for the Council to adopt this Plan under the current legislative requirements that have been complied with.

Name of lawyer consulted: Katie Kam Date: 13/11/25

8. Risk implications

8.1 Key risks relating to the approval of this report have been assessed in accordance with the council's risk management guidance. Mitigating actions have been identified to reduce all risks to the lower ("green") level, except for the uncertainty about long-term funding which will continue to remain uncertain. A lack of funding could significantly impact the future delivery of projects and services.

8.2 Should the recommendation to adopt Our City Transport Plan as council policy not be enacted it could weaken our ability to bid for funding that the DfT award on a competitive basis. It could also make engagement with the new Mayoral Strategic Authority difficult in terms of setting out the transport challenges and needs of the city.

9. Equalities implications

9.1 Accessibility is a key issue in transport particularly for disabled people and older people, who are more likely to experience age-related disability. Our Equality Impact Assessment (EIA) also considered impacts on groups beyond those who have protected characteristics. Our evidence base highlighted the outsize impact that transport availability has on low-income groups.

9.2 Feedback was received from a workshop with Possability People's Get Involved Group and written feedback from the Brighton & Hove Older People's Council. The EIA has been updated to focus on the impacts of the transport plan on these groups, which share similar accessibility challenges. The updated EIA accompanying the final version of Our City Transport Plan 2035 is provided as Appendix 4 to this report.

9.3 Feedback highlighted concerns about unsafe pavements, crossings and shared space where reckless cycling posed perceived safety risks to pedestrians. Participants also reported difficulty accessing some bus stops due to long distances between stops.

9.4 The council is working to improve city centre walkability, maintain pavements and install more dropped kerbs to enhance accessibility and reduce trip hazards for everyone, particularly older people and those with mobility issues. The new commitment to publish a streetscape design guide is intended to improve how accessible our streets are for disabled people.

9.5 The Bus Service Improvement Plan which sits underneath the transport plan, includes proposals for 2025 and beyond to enhance the bus network and services, including improvement to bus stops and network coverage which may address concerns about bus accessibility. Disability group representatives have expressed a desire to be properly engaged in the consultation process.

10. Sustainability implications

10.1 The sustainability implications checklist has been completed for the transport plan. Overall, the plan will have positive impacts on sustainable travel and transport, as well as on health, safety, wellbeing and local communities.

10.2 The draft version of Our City Transport Plan 2035 underwent a strategic environmental assessment, (Appendix 5). This found that the likely effect of the plan on the environment ranged from minor positive to significant positive, with the exception of the effects on; land, soil and waste, water resources and quality, which are unknown. The effects on historic environment are likely to be both positive and negative.

10.3 The SEA has been circulated to Historic England and Natural England for comment. Historic England was content with the report which covered the issues that may arise to impact on heritage assets and Natural England advised that there are no significant issues related to their remit.

10.4 In addition, we have assessed the impact of our policies on carbon emission reductions using the Carbon Emissions Playbook (developed by sub-regional transport bodies to be used by all English local authorities for this purpose) and found that they all have a positive impact. However, the level of emission reduction looks to be insufficient for national targets to be met, if we assume that other local authorities perform similarly to us. This was also the case even under a scenario when all carbon reduction policies were maximized and suggests that greater measures at the national level are required.

11. Health and Wellbeing Implications:

11.1 Impacts on human health were considered within the environmental report (appendix 5) on Our City Transport Plan 2035. It was judged that the plan would have a significant positive impact, due to the focus on active travel, improving air quality and road safety.

11.2 The health and wellbeing implications checklist has also been completed for the transport plan. Overall, the plan will have positive impacts on creating

healthy places and communities as well as improving access to fair education, employment and transport. The plan assists in delivering the council's Joint Health & Wellbeing Strategy and Physical Activity Strategy.

11.3 As noted in the sustainability impact section, the proposals will help residents lead more active and healthy lives and contribute to a less stressful and healthier environment. By delivering a safe, inclusive and integrated transport system (another objective in the plan), the plan will improve access to education, employment, social connections and leisure opportunities.

Other Implications

12. Procurement implications

12.1 There are no direct procurement implications arising from this report. The policies and projects contained within Our City Transport Plan 2035 do not commit us to any procurement activity. Projects would be subject to their own procurement process, for which various framework agreements are available.

13. Crime & disorder implications:

13.1 While personal safety consideration affects how people travel, the policies within Our City Transport Plan 2035 show no significant implications on the council's statutory duty (s17 Crime and Disorder Act 1998) to do all they can to reasonably prevent crime and disorder.

13.2 It tends to be at the scheme level, where the design of our urban realm is considered that there are opportunities to improving safety and design out crime.

14. Conclusion

14.1 We have undertaken a robust exercise to determine what challenges the city faces and what objectives and schemes will address them. Adopting Our City Transport Plan 2035 as the council's overarching transport policy will set out the city's transport challenges and objectives ahead of engaging with the Mayoral Strategic Authority from May 2026.

Supporting Documentation

1. Appendices

1. Our City Transport Plan 2035
2. Our City Transport Plan 2035 – Supporting Evidence Base
3. Our City Transport Plan 2035 – Consultation Report
4. Equality Impact Assessment for Our City Transport Plan 2035
5. Environmental Report for Our City Transport Plan 2035
6. Table of risks

Note that this document highlights where changes have been made from the draft version of Our City Transport Plan 2035. A clean version, of the final plan will be published on the council website after Our City Transport Plan 2035 has been approved.

~~Deleted text is shown using strikethrough~~

New text is shown in red.

The costs included in the three-year delivery plan are indicative, based on funding we received in 2025/26. We are yet to receive confirmation of our funding settlement for 26/27 onwards and the capital programme delivery plan will be confirmed through a separate cabinet decision.

Foreword

Travel is a means to an end. People undertake most journeys for a purpose, be that shopping, visiting friends, getting to work or school. In the same way, Our City Transport Plan 2035 is a means to achieving the wider outcomes we want for Brighton & Hove:

Councillor Trevor Muten, Cabinet member for Transport and City

- a growing economy, including our visitor, night-time and innovation sectors
- a fairer, more equitable, accessible and inclusive city
- a city that has low emissions, clean air and is sustainable
- a city that is easy to get around, with well- run services

Our City Transport Plan 2035 sets out an ambitious vision for getting around a cleaner, fairer and growing city over the next decade. By 2035 more people will choose to make more of their journeys within the city by active travel (walking, wheeling, cycling) and public transport, because it will be safer, quicker and more convenient for them to do so. To achieve this, we will improve our public spaces, pavements, cycle infrastructure and key routes. With more people choosing active travel and public transport we can make better use of our road space which will help reduce congestion and delays on our roads, benefiting all users.

By 2035 all new vehicles sold in the UK must be zero emission. Petrol and diesel vehicles are already being replaced by electric ones and by 2035, if not sooner, more than half of the vehicles in Brighton & Hove will be electric. This huge change will require an increase in electric vehicle chargepoints. The shift to electric vehicles will make the single biggest contribution to reducing carbon emissions from our transport network, helping the UK meet its global commitments to tackling climate change. It will also mean that the air we breathe is cleaner. Brighton & Hove City Council are already one of the leading local authorities for providing electric vehicle chargepoints and have ambitious plans to provide even more, so that people can be supported to make the choice to switch to greener transport. We are determined that this transition to a cleaner transport system will be done in a way that doesn't exclude or leave behind those on low incomes or who are otherwise at risk of being marginalised. The city needs to remain a welcoming place, that is open for businesses and visitors.

After years of underfunding for local authorities, we are entering a new era of devolved government. For Brighton & Hove and the wider Sussex area the proposal is to establish a new Mayoral Strategic Authority, with responsibility for strategic transport across the region. It is our hope that the devolution of powers to this new regional body, and the associated re-organisation of local government,

will provide fresh impetus to deliver ambitious schemes, such as purpose-built Park & Ride facilities for the city. This document sets out what we wish to see delivered in the coming 10 years.

Executive Summary

Our City Transport Plan 2035 is the council's over-arching transport policy for the coming decade. ~~This is a draft version of the plan that we are seeking people's views on through a public consultation.~~ It sets out our strategic vision for getting around a cleaner, fairer and growing city. To achieve this vision, there are five key challenges that we need to address.

Challenge 1: Enabling more people to live safer, healthier and more active lives

Challenge 2: Reduce congestion ~~Improving the flow of traffic~~ on our roads

Challenge 3: Supporting the transition to zero and ultra-low emission transport ~~vehicles~~

Challenge 4: Creating a transport network that is more inclusive

Challenge 5: Maintaining our roads and managing them as efficiently as possible

Challenge 1: Enabling more people to live safer, healthier and more active lives. Our City Transport Plan 2035 has been written to work in harmony with the objectives that have been set out in the Council Plan 2023-2027. This has four outcomes, one of which is for Brighton & Hove to be a healthy city where people thrive. By providing attractive public spaces that are safe and easy to get around by active travel, we will enable more people to choose to incorporate physical activity into their day. While the number or people killed or seriously injured on our roads is relatively small, fears about road safety are a significant barrier for many people adopting more active travel. We are also aware that some pavements in the city can be narrow or in poor condition.

We want to give more people the option of choosing active travel by providing infrastructure, like protected cycle lanes and attractive well-maintained pavements, that make people feel safe and provide them with the support and training to feel confident in travelling actively. We also want to reduce further the number of people killed or seriously injured on our roads by 2035.

Challenge 2: Reducing congestion ~~Improving the flow of traffic~~ on our roads. Brighton & Hove is a great place to be, but our road network struggles to cope when there are lots of people on the move at the same time. At busy times congestion causes delays which affects all users including businesses and our visitor economy. The space allocated to roads in the city is relatively fixed, this plan does not advocate extensive new roadbuilding, therefore we need to strike a balance between different road users' needs. Advances in technology will also enable innovative

solutions utilising technology such as Artificial Intelligence (AI) within network management of the city's strategic roads.

Our approach will be to encourage more efficient use of the road space we have. Buses and active travel are the most efficient forms of transport and suitable for many short trips. We aim to provide mobility hubs, that will improve access to public transport, car clubs and other shared transport. Strategic mobility hubs on the edge of the city can provide Park & Ride facilities for those visiting and commuting, while smaller neighbourhood mobility hubs can provide easy access to public transport, car or bike hire.

Challenge 3: Supporting the transition to zero and ultra-low emission transport ~~vehicles~~.
Switching away from petrol and diesel-powered vehicles is the single most important measure that will improve local air quality and reduce carbon emissions from transport. ~~For heavy vehicles there is still uncertainty about whether the switch will be to hydrogen or electric vehicles (EVs). For cars and vans however,~~ The switch to EVs is already taking place, with about 22% of new car sales in 2025 being battery EVs. These vehicles are commonly refueled when parked. Fifty-four per cent of households in Brighton & Hove lack off-street parking and the council will play a key role in providing the necessary charging points for these households that own vehicles[1]. Alongside Our City Transport Plan 2035, we are developing a dedicated Electric Vehicle Charging Plan, setting out exactly how we will address this challenge.

Challenge 4: Creating a transport network that is more inclusive. Disabled people and those on lower incomes make fewer trips than the general population. In part this is because these groups find travel harder to access. We will focus our resources on reducing barriers that these people face. We commit to updating our streetscape design guidelines. We will do this in close consultation with groups representing disabled people in the city. There are areas of the city where people on low incomes are at greater risk of transport-related social exclusion because it is difficult to access basic services and employment without a car. We will continue to provide and aim to enhance subsidised bus services to these areas. We will also focus our resources on improving the accessibility of our city for disabled people.

Challenge 5: Maintaining our roads and managing them as efficiently as possible. This is a major challenge. Over the past decade the money we received from central government, which is ring-fenced for roads maintenance, has been insufficient. With other local authority funding also in decline over the past decade, we have not been able to increase the amount we spend on roads maintenance without it impacting on other council services. Without adequate investment, the condition of our roads will continue to get worse.

We will continue to use the resources we have in the most efficient way possible and deliver new schemes that cost less to maintain. This includes lane rental charges for utilities digging up our roads to incentivise them to minimise disruption. However, this

[1] Zapmap & Field Dynamics, 2024. National Map of EV Charge Point Coverage.

challenge is not something that the council can solve by ourselves. We will also make the case to central government for greater investment in our local roads to reverse the decline they have suffered. In addition, managing our roads is a key challenge and we can look to future technology solutions to help manage our busy network.

To address the 5 challenges, Our City Transport Plan 2035 focuses on 6 objectives. Each of these addresses one or more of the above challenges we face.

	Challenge				
Objective	**Safer, healthier lives**	**Reduce Congestion**	**Zero emission vehicles**	**Inclusive transport**	**Maintain roads**
1. Increase public transport use	✓	✓		✓	
2. Enable the uptake and use of zero and ultra-low emission transport	✓		✓		
3. Deliver a safe, inclusive and integrated transport system	✓			✓	
4. Create well-maintained streets, pavements and right of ways	✓			✓	✓
5. Provide active travel choices for all and excellent public spaces	✓	✓		✓	
6. Promote and use technology to reduce and manage travel		✓	✓		✓

Table 1: How Our City Transport Plan objectives meet the challenges we face

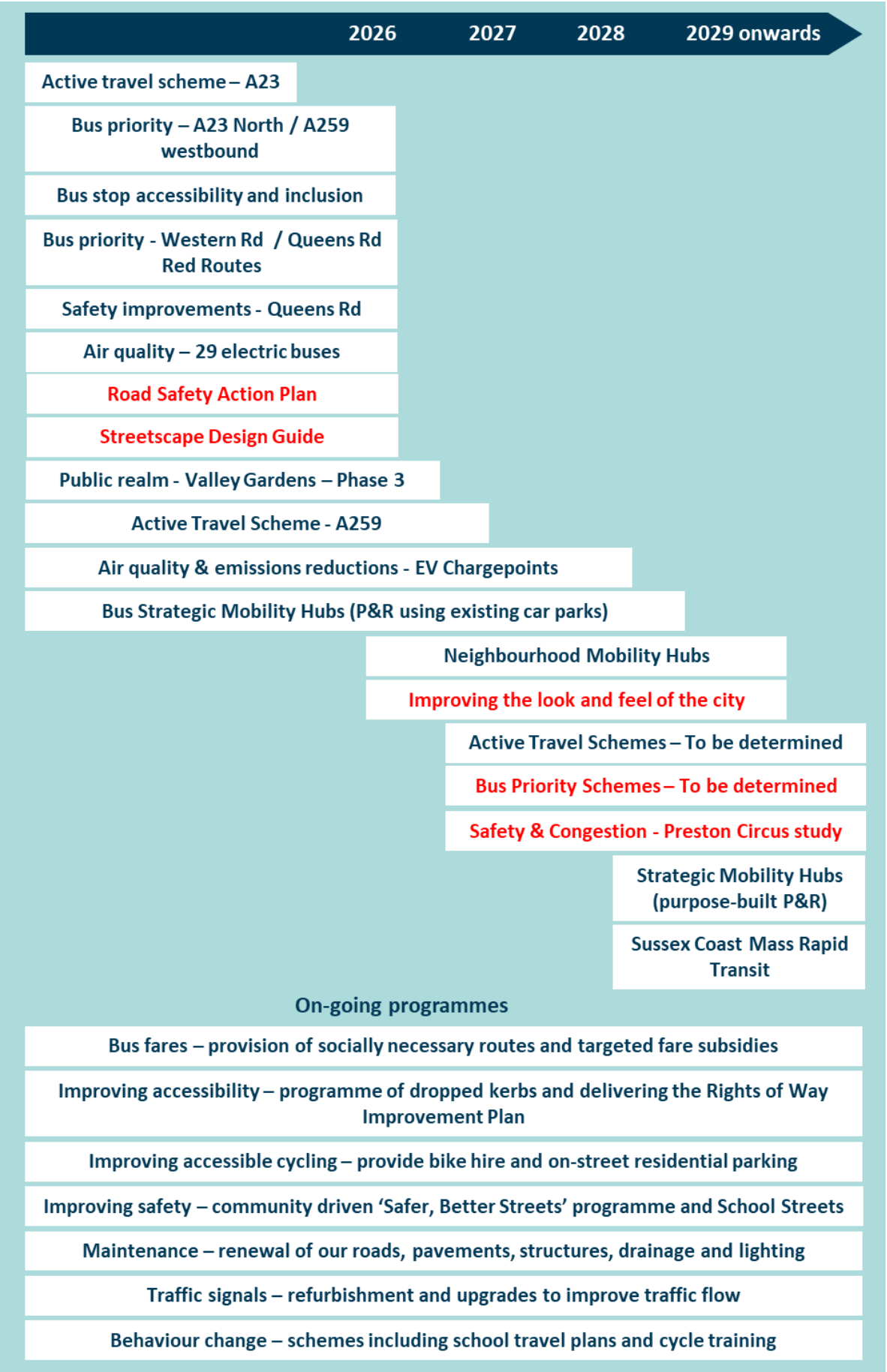


Figure 1: Summary of capital projects and ongoing works proposed in Our City Transport Plan 2035

Introduction

How and why we are writing Our City Transport Plan 2035

Our City Transport Plan 2035 guides how we will spend the funding we receive from Government to improve transport in the city. It is our over-arching transport policy document, which replaces our fourth Local Transport Plan (LTP4), adopted in 2015. At the time of writing, the creation of a new regional governmental body, the Sussex Mayoral Strategic Authority, is anticipated to take place in the spring of 2026. This body will be responsible for producing a 'Local Transport Plan' for the wider region. Our City Transport Plan 2035 is designed to inform the Mayoral Strategic Authority, along with other stakeholders and residents, how we plan to deliver our vision for **getting around a cleaner, fairer and growing city**.

In addition to setting objectives to achieve this vision this plan contains a short-term programme of work for specific transport schemes we plan to deliver. Delivery of this programme of work will depend on how much funding the council receives, and any funding referred to in this plan is indicative. Confirmation of the funding we will receive typically occurs shortly before the start of the financial year. We will update the programme of work included in this plan by publishing an annual capital programme for transport schemes. The capital programme will be approved by cabinet - the council's executive decision-making body, made up of elected councillors. The schemes in the capital programme will be designed to achieve the objectives set out in this plan.

Accompanying this plan are policies that set out greater detail for specific areas. For example, our Bus Service Improvement Plan (BSIP) focuses on improving bus travel in the city. We receive a dedicated grant to implement the BSIP and use this funding to deliver targeted cheaper fares, new bus lanes and other infrastructure. The BSIP is regularly reviewed and updated as the feasibility of potential new bus infrastructure schemes are assessed.

Since the adoption of LTP4 in 2015 there have been significant changes in national policy that this plan has taken account of. A significant change has been the Department for Transport's (DfT) publication of 'Decarbonising Transport' policy. This made a commitment to 'drive decarbonisation and transport improvements at a local level by making quantifiable carbon reductions a fundamental part of local transport planning and funding'[2]. This commitment has been followed up by the release in 2024 of a Carbon Assessment Playbook, which is a tool designed to help local authorities estimate the impact that a variety of transport policies will have on reducing carbon emissions in their area. The Carbon Assessment Playbook has been used to understand the impact of the policies within this plan.

The process we undertook to write Our City Transport Plan 2035 is illustrated in

[2] DfT, 2021. Decarbonising Transport: A Better, Greener Britain

Figure 2. The starting point was to collate information into an evidence base and use this to identify what challenges the city faces. We then identified how we should respond to these challenges based on the vision we want to achieve.

In autumn 2021, we published a document called 'Developing a new Transport Plan for Brighton & Hove' and held a public consultation. We received over 900 responses, which were broadly positive of our proposals. A detailed report on the consultation is available on the council website[3]. After a pause in developing our transport policy, while we awaited publication of government guidance, a draft version of Our City Transport Plan 2035 was published in June 2025. This was aligned with the Council Plan 2023-2027 and other council policies such as the Accessible City Strategy 2023-2028. Public consultation on the draft version of this plan was carried out in the summer of 2025. Amendments have been made to this final document in response to the feedback received.

Figure 2: Process for developing Our City Transport Plan

Each annual capital programme is typically approved immediately before the beginning of the financial year. This is done once we know exactly what funding we will receive and can make firm plans on how to spend it. This document also includes proposed key performance indicators that we will use to monitor how we are reaching our objectives.

~~Our City Transport Plan covers the period 2025-2035. It is our over-arching transport policy document, which sets out both our long-term strategy and a short-term programme of work to deliver specific schemes. One of the key functions of Our City Transport Plan is to communicate to central government, who provide the majority of funding for local transport, what schemes need to be delivered in the city over the coming decade.~~

[3] Brighton & Hove City Council Environment, Transport & Sustainability Committee, 15 March 2022. Local Transport Plan: Engagement Outcomes

Accompanying this plan are other policies that set out greater detail for specific topic areas, such as our Bus Service Improvement Plan (BSIP). It is a legal requirement that we write this document, which in the relevant legislation, is referred to as a Local Transport Plan (LTP). Our City Transport Plan 2035 is our fifth LTP. The Transport Act 2000, amended by the Local Transport Act 2008, directs us to:

- develop policies for the promotion and encouragement of safe, integrated, efficient and economic transport to, from and within our area, and carry out our functions to implement those policies, and
- have regard to any guidance issued by the Secretary of State on preparing a Local Transport Plan.

Detailed requirements for an LTP are set out in guidance issued by the Secretary of State for Transport. LTP guidance was last published in 2009 and, although central government announced that new guidance would be published in autumn 2022, it has yet to do so. We do however have an insight into what updated guidance may contain from recently published national transport policies and other central government communications.

We have written Our City Transport Plan using these insights into what it is reasonable to assume will be included in the new guidance when it is eventually released. The most significant change we anticipate being included in updated guidance is the requirement to quantify our local carbon emissions.

The Department for Transport (DfT) published a policy on Decarbonising Transport in 2021 which made a commitment to 'drive decarbonisation and transport improvements at a local level by making quantifiable carbon reductions a fundamental part of local transport planning and funding. This commitment has been followed up by the release in 2024 of a Carbon Assessment Playbook, which is a tool designed to help local authorities estimate the impact that a variety of transport policies will have on reducing carbon emissions in their area. We have therefore written Our City Transport Plan 2035 using the Carbon Assessment Playbook in the expectation that any new guidance will include a requirement to assess what impact our policies will have on carbon emissions.

The starting point for writing Our City Transport Plan 2035 was for us to collate the available evidence about travel and transport in the city into an evidence base and use this to identify what challenges the city faces. We then identified how we should respond to these challenges by creating a vision for how we want our transport system to function in the future. At this point, in autumn 2021, we involved key stakeholders and the wider public to share the work we had undertaken by publishing a document called 'Developing a new Transport Plan for Brighton & Hove'. The public consultation on the proposed vision in this document involved an online survey, workshops with key stakeholders and sessions with groups that can otherwise be under-represented in order to ensure responses from a representative cross section of Brighton & Hove's population. We received over 900 responses, which were broadly positive of our proposals. A detailed report on the responses we received, along with amendments made to this initial work following the public input

~~is available on the council website.~~

~~This draft version of Our City Transport Plan 2035 contains further amendments made to align it with the Council Plan 2023-2027, which is the over-arching policy document for the council, setting out what we want to achieve up to 2027. While the horizon of this plan is 2027 the 4 identified outcomes will require sustained work beyond this to be fully achieved. We are now undertaking public consultation on this draft Our City Transport Plan 2035 document to shape the final version, which will then become council policy.~~

~~This document contains a greater level of detail than the previous 'Developing a new Transport Plan for Brighton & Hove' document. It provides greater context and in addition to the vision and objectives it looks at how our capital investment programme will change in the coming financial years. For the later years of this plan there are proposed schemes that we wish to deliver but which are not yet programmed to come forward. This is because our funding is chiefly from central government grants and the level of funding we will receive is not yet known. Because of this we have had to plan for different scenarios. The scenario planning has looked at what is possible under higher and lower levels of funding and what could happen if different policies are implemented at the national and regional level in pursuit of stated objectives.~~

~~Each annual capital programme is typically approved immediately before the beginning of the financial year by the council's executive decision-making body, the cabinet, which is made up of elected councillors. This is done once we know exactly what funding we will receive and can make firm plans on how to spend it. The schemes delivered by the capital programme are designed to achieve the objectives set out in this plan. This document also includes proposed key performance indicators that we will use to monitor how well we are doing in reaching our objectives.~~

~~The public consultation on this draft version of Our City Transport Plan 2035 focuses on gathering feedback on the more detailed measures, such as the proposed future schemes and how we will monitor our progress against our set objectives. Our public consultation will consist of an online survey, drop-in events providing an opportunity for residents to ask questions and share their views in person and sessions with key stakeholder groups. Key stakeholders include groups with a focus on transport users, economic growth, and those that could be under-represented without us making a conscious effort to include them such as disability groups and young peoples' voices. After the public consultation on this draft document, we will analyse all feedback and summarise it in a stakeholder engagement report, which will be considered by the council's cabinet when making a decision on adopting the final version of Our City Transport Plan 2035.~~

Review of work since our last transport plan

Our City Transport Plan 2035 supersedes Local Transport Plan 4 (LTP4), which was approved by the council in March 2015. Over the past 10 years, approximately

£148m has been allocated to deliver transport projects in the city. We receive grant funding from central government, typically ring-fenced for specific transport uses and this made up £107m of the total. The other £41m was allocated from the council's own funds.

Forty-eight per cent of the funding over the previous 10 years has been allocated to planned maintenance of existing assets: roads, pavements, paths, bridges, drains, signage and street lighting. Fifty-one per cent has been spent on schemes that created new assets or altered existing roads and pavements. One per cent was spent on revenue schemes where investment was made in people – receiving training or other assistance. Some of the main projects that have been delivered over this time are listed below:

Highway maintenance
This includes resurfacing roads and pavements, replacement of drainage and lighting infrastructure, upkeep of bridges and retaining walls, and the associated record keeping and surveys of all our assets. Nearly £32m has been spent keeping these in working order. There are around 20,000 streetlights in the city and over 18,000 have been switched to energy efficient light emitting diode (LED) lighting. This saves the council about £500,000 a year in lower energy costs.

Valley Gardens Phases 1&2
The green spaces of Valley Gardens used to be cut off from the North Laine area of the city centre, as they were surrounded by busy dual carriageways on both sides. The delivery of Valley Gardens Phases 1&2 has re-planted these green spaces and reconnected them with the city centre, making them spaces residents and visitors to the city centre can enjoy. By re-purposing the road on the western side of the gardens as a corridor for buses and taxis, space has been created for more direct active travel routes (particularly for walking & wheeling); improved and accessible gardens, public realm and event spaces. The third and final phase of Valley Gardens project is in progress, and this will deliver an excellent public space immediately in front of the Royal Pavilion, one of the city's main visitor attractions.

Western Road
This busy bus and active travel corridor has been transformed with improvements including a resurfaced road, resurfaced and tidier pavements, a simpler road layout with a central area to help with crossing for pedestrians; more cycle parking, seating and tree planting; and new bus shelters and street lighting. These major works have been funded from a range of sources, bringing together funding to ensure wide benefits to a range of users on this key route.

A259 seafront arches & Shelter Hall
The seafront arches support the A259 so they are classified as transport infrastructure. Ongoing maintenance work has taken place over the past 10 years along the length of the seafront, from the i360 in Hove, to Dukes Mound near the marina. We have taken the opportunity during the work to create attractive new spaces on the beachfront. This included the creation of Shelter Hall, a new seafront restaurant space.

Bus infrastructure

Since 2015 a mix of technological improvements and new bus lanes have delivered large benefits for both passengers and other road users. The Brighton & Hove Bus Ultra-Low Emission Zone covers well over 90% of buses operating in the city and has ensured that their engines meet the highest emissions standards for diesel vehicles. Smart traffic signals have been installed, which recognise when buses are approaching and adjust signal timings to give them priority. New Red Routes, recently created on the important bus corridors of Lewes Road and the A23, have prevented buses being delayed by inconsiderate parking, as well as keeping traffic moving and making these key routes safer for cyclists and pedestrians.

Electric Vehicle Chargepoints
LTP4 stated that there were 10 EV chargepoints in the city that the council had installed. There are now 525 chargepoint sockets that we have installed, which are a mix of low powered, fast and rapid chargers. There are 250 low powered chargepoint sockets, installed on lamp-columns in residential areas where households lack off-street parking and are designed for convenient recharging while cars are parked up. There are also 100 fast chargers around the city which provide a quicker charge or top-up. The council has provided 6 public rapid chargers, located where people will only be parked for a relatively short time, and 12 rapid chargers dedicated for taxi drivers. A minimum of 1,200 lamp column chargepoints, 350 fast chargepoints and 100 rapid chargepoints are planned to be installed across the city in the next 3 years.

Bikeshare
In September 2017 we launched the city's first public bike hire scheme with 50 hire stations and 500 bikes. In March 2023 this was refreshed with a new operator, additional hire stations and a new fleet including electric bikes. There are now 780 bikes for hire from over 100 hire stations. 60% of the bikes are now electric, so hilly areas are more accessible, and the scheme extends over a vast majority of the city. New sites to serve large housing developments will be sought to increase its reach. The scheme allows adjacent authorities to use our contract with the current provider to install hire stations and create one hire area across the greater Brighton area.

Active travel infrastructure
Our first Local Cycling and Walking Infrastructure Plan (LCWIP) was adopted in 2022 and shows the ambition of the city for improving active travel infrastructure, with 39 strategic network routes for improvement (including 17 priority routes), 32 local links for improvement, and 33 areas for area-based treatment improvements. Having the highly ambitious LCWIP in place allows us to showcase to central government the need for investment in active travel across the city.

Since 2015 we have added to the existing protected cycle network by delivering the Valley Gardens (Phases 1 and 2) scheme and upgraded facilities on the seafront roads of the A259 and Maderia Drive. This addresses one of the major barriers preventing people from accessing cycling; road safety concerns. Having somewhere safe to store a bike is another barrier and the council has installed 150 on-street residential cycle hangers, capable of storing 900 bikes securely, which residents can rent for the year at low cost.

Improvements to active travel infrastructure have also focused on connecting urban centers to the South Downs National Park. Woodingdean and Falmer are now

connected by a new 2.5km path. Woodingdean has also benefited from a new 1.5km path on Drove Road and path improvements in the Happy Valley area where 1.1km of new paths have been created. Stanmer Park is also accessible from Brighton via a new 2km path alongside Ditchling Road.

Road safety
Road safety measures can take the form of changes to particular road layouts, where there have been a high number of collisions, or area wide measures. Research shows that on urban roads with low average traffic speeds, any 1mph reduction in average speed can reduce the collision frequency by around 6%[4]. Most of the city's residential roads are now 20mph with phase 3 having been completed in the summer of 2015. Examples of more targeted safety measures includes our School Streets and Safer, Better Streets programmes. There are 15 schools in the city where School Street schemes have been delivered, and more are planned. The Safer, Better Streets programme[5] applies a set of principles and rules to assess and prioritise safety improvements, with an annual top ten locations identified where improvements are most urgently needed.

Training & behaviour change schemes
The council has funded a wide range of schemes to help keep people safe and allow them to access active travel and public transport. The three Bikeability levels teach the Highway Code and moves learners from learning balancing and riding skills off-road to mastering riding on quiet, and in due course, busier roads. We offer courses delivered in schools and in parks during school holidays to under 14s. Adult (14+) training takes place in parks and on roads. We also offer adult cycle maintenance basic and advanced training. We deliver child pedestrian training to Year 3 cohorts teaching them safe crossing skills.

Policy Context

[4] DfT, 17 March 2024. Setting local speed limits
[5] Brighton & Hove City Council. Safer, Better Streets programme

Our City Transport Plan 2035 must conform with relevant national, regional and local policies. National transport policies are created by the Department for Transport, ~~with regional policy the responsibility of Transport for the South East (TfSE). TfSE is one of eight relatively new regional transport bodies~~. Regional policy has been the responsibility of Transport for the South East (TfSE). TfSE has created policies that cover an area south of London from Kent in the east to Hampshire and Berkshire in the west. It was established in 2017, to determine what transport infrastructure is needed to boost the region's economy. Its board is made up of elected councillors from each local transport authority within its area and representatives from other national and regional partners including National Highways, Network Rail, South Downs National Park and Transport for London (TfL).

Figure 3: National and regional policies influencing Our City Transport Plan 2035

National
Integrated National Transport Strategy
Inclusive Transport Strategy
Decarbonising Transport
Future of Freight Plan
Gear Change: A bold vision for cycling and walking
Bus Back Better: National Bus Strategy
The Plan for Drivers
Cycling & Walking Investment Strategy
Connecting People: A Strategic vision for Rail
UK Electric Vechicle Infrastructure Strategy
Road Safety Statement
Future of Mobility: Urban Strategy
Strategic road network and the delivery
of sustainable development'
Regional
Transport for South East's:
• Transport Strategy
• Strategic Investment Plan

Figure 3 shows the key national and regional policy documents that have influenced the development of Our City Transport Plan 2035. Central government is currently developing an Integrated National Transport Strategy. A range of national transport policies that are either mode specific, such as rail or bus, or thematic, such as decarbonisation or accessibility and which applies to all modes, sit under the

Integrated National Transport Strategy. Central government funding streams are aligned with these policies and designed to deliver them. For example, the Cycling and Walking Investment Strategy and UK Electric Vehicle Infrastructure Strategy both have an accompanying funding stream; the Active Travel Fund (ATF) and Local Electric Vehicle Infrastructure (LEVI) fund. At the regional level TfSE has created a Transport Strategy and Strategic Investment Plan (SIP). Figure 4 shows schemes included in the SIP, which covers a period up to 2050, in the vicinity of Brighton & Hove.

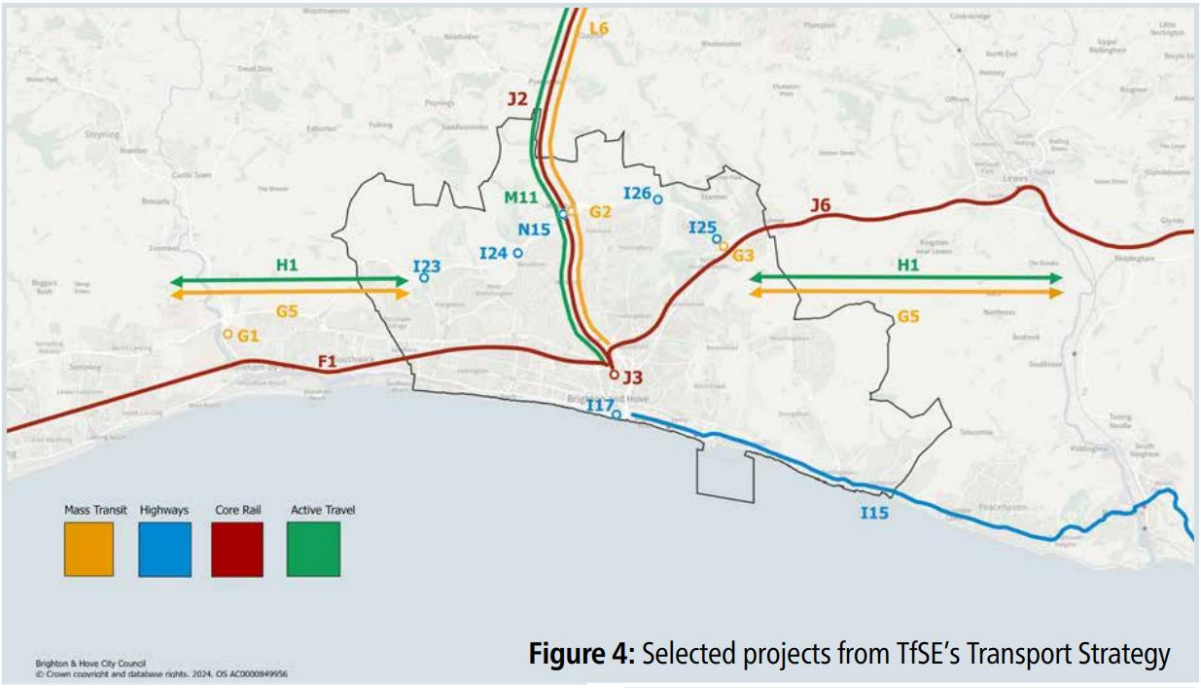


Figure 4: Selected projects from TfSE's Transport Strategy

KEY

F1	West Coastway Strategic Study
G1	Shoreham Strategic Mobility Hub
G2	A27/A23 Strategic Mobility Hub
G3	Falmer Strategic Mobility Hub
G5	Sussex Coast Mass Rapid Transit
H1	Sussex Coast Active Travel Enhancements
I15	A259 Highway Improvements
I17	A259 (Kings Road) Arches Renewal
I23	A27 Hangleton Junction Enhancements
I24	A27 Devils Dyke Junction Enhancements
I25	A27 Falmer Junction Enhancements
I26	A27 Hollingbury Junction Enhancements
J2	Brighton Main Line 100mph Operation
J3	Brighton Station Additional Platform
J6	East Coastway Line faster services
L6	A23 Corridor Rural Bus Enhancements
N15	A27/A23 Junction Enhancements
M11	Brighton/London National Cycle Network

Note that there are additional schemes not shown on this map that will also have a beneficial impact on Brighton & Hove. This is especially true for rail-based schemes, which are best planned at the regional level because routes cross over several local authorities and our ambitions for rail need to align. The most significant improvement on the Brighton Mainline would be delivered by the Croydon Area Remodelling Scheme, which would involve the rebuilding of East Croydon station with additional platforms. New bridges and fly-unders would separate rail lines that currently cross over one another. This is at the concept design stage but would improve reliability, capacity and the speed of some rail services on the Brighton Mainline.

Other transformative regional schemes that are proposed include Sussex Coast Mass Rapid Transit and strategic mobility hubs at Falmer, the A23/A27 junction and Shoreham-by-sea. A Sussex Coast Mass Rapid Transit would link up the cities and towns along the Sussex Coast. One inspiration for this scheme is the Belgium coastal tram that links ports, towns and seaside resorts along 60 kilometers of the coast. The Sussex scheme is not sufficiently developed to have decided what form it will take. Inspiration for a bus-based solution exists in Cambridgeshire where a dedicated busway connects Cambridge with commuter towns along the congested A14 corridor, where significant housing growth is planned.

Buses and active travel are the most efficient forms of transport and suitable for many short trips. The strategic mobility hubs on the edge of Brighton & Hove would have Park & Ride at their core and could also incorporate electric vehicle rapid recharging, and freight consolidation centers which have the potential to reduce the number of trucks within our city. The aim of these mobility hubs would be to enable easy interchanges between transport modes, encourage more efficient use of the road space and reduce congestion ~~improve the flow of traffic~~ within our city by providing a choice for visitors from outside to conveniently transfer onto public transport to access the city centre.

TfSE's funding is currently limited to developing business cases and feasibility work for the schemes within the SIP. However, ~~In the very near future there will be large changes to how local and regional governmental bodies are organised, as set out in the central government's white paper on Devolution. A~~ the new Mayoral Strategic Authority, ~~covering East Sussex, West Sussex and Brighton & Hove is anticipated to be in place by 2027. This is likely to~~ will have responsibility for strategic transport policy and may have greater scope to ~~control significant amounts of funding to~~ deliver the type of schemes set out in the SIP.

Figure 5: Our City Transport Plan 2035 and related policies

Figure 5 illustrates how Our City Transport Plan 2035 relates to other Brighton &

Hove City Council policies. It is subordinate to and supports the delivery of the overarching Council Plan 2023–27. The Council Plan identifies transport specific measures, under the Outcome ‘A City to be Proud of; an accessible, clean and sustainable city’. It commits the council to make it easier for people to move around the city and to:

- Have a clear plan to address the city’s transport needs and challenges
- Continue investing in maintaining and upgrading our highways network

It also has an important role to play in delivering the aspirations of other ~~whole~~ council-wide policies, such as the Accessible City Strategy, given that our roads and pavements make up such an important part of our public space. Transport is also crucial to the council policies on land use (which set out what can be built where), growing our economy and increasing our populations’ health and physical activity.

Sitting below Our City Transport Plan 2035 are several more detailed policies that cover areas such as improving conditions for walking, wheeling and cycling (Local Cycling and Walking Infrastructure Plan or LCWIP), or bus journeys (Bus Service Improvement Plan or BSIP). The Electric Vehicle Charging Plan is in development and following the adoption of Our City Transport Plan 2035 we will create a new Road Safety Action Plan that sets out targets for reducing casualties on our roads and what actions we will take to achieve this.

Key Council Policies influencing Our City Transport Plan 2035

Accessibility: The Accessible City Strategy establishes priority actions for each directorate within the council. Actions for the City Operations Directorate include improving city centre accessibility. Dedicated funding for improving accessibility is included in our capital works programme.

Economic development: A good transport network supports economic growth while traffic congestion adds to business costs. Our Economic Plan 2024-27 sets out 10 imperatives, one of which is the imperative to 'build a stronger, more inclusive labour market'. Our City Transport Plan objective to 'deliver a safe, inclusive and integrated transport system' supports this imperative.

Land use: City Plan 2041 is the overarching planning document for the city, setting out our policies for what can be built where. Subordinate to this are other planning policies. When we receive planning applications, approval is granted based on how well the application complies with our planning policies. There are close ties between land use and transport. Transport polices concerning new development are set out in the City Plan. Recent public consultation on City Plan 2041 shows strong levels of support for attractive streets and public spaces, supporting healthier lifestyles by reducing the impact of traffic, provision of local transport hubs, Park & Ride and delivery consolidation.

Health and physical activity: The Physical Activity Strategy 2024 – 2034 has five key areas of focus, one of which is to create Active Environments. Our City Transport Plan 2035 can help develop the city so that it is a place where people feel safe to travel actively as part of daily life. This key focus is reflected in the objectives to 'Provide active travel choices for all and excellent public spaces.' and 'create well-maintained streets and pavements'.

Carbon emissions: In the UK the transport sector is responsible for the largest volume of CO2 emissions. Our Carbon Neutral Programme collates actions that are being taken across different council departments. With transport CO2 emissions being critical to us achieving our ambitions to be a carbon neutral city, four objectives in Our City Transport Plan 2035 contribute to reducing them: enabling the uptake and use of zero and ultra-low emission vehicles, increasing public transport use, providing active travel choices for all and excellent public spaces and promoting and using technology to reduce and manage travel.

Air quality: The main source of pollutants causing poor air quality in Brighton & Hove are the petrol and diesel vehicles on our roads. Six Air Quality Management Areas (AQMA) have been declared in the city because levels of Nitrogen Dioxide (NO2) exceeded UK air quality standards. Vehicles are also a significant source of particulate matter (PM) air pollution. Our Air Quality Action Plan 2022-27 has influenced the creation of Our City Transport Plan 2035. The interventions supporting the objective 'enabling the uptake and use of zero and ultra-low emission transport' will have the biggest impact on improving air quality.

Challenges

Brighton & Hove is a relatively compact city, with a population of 277,100[6]. Housing affordability and housing quality are major issues that the city faces, as the supply of housing has not kept pace with the demand from people who wish to live here. Our population growth has been slower than the average for England and the southeast region. Delivering new housing and commercial space must largely be achieved within the existing urban area as expansion is tightly constrained by the South Downs National Park, which makes up 40% of the area that the council administers, and ~~also~~ by the sea ~~to the south~~. The city's two universities mean that students make up about 10% of the population.

The city acts as a regional hub for employment, transport, culture, leisure and shopping. Employment tends to be concentrated in the centre of Brighton and there are similar inflows and outflows of commuters of around 30,000 trips per day.

Figure 6 shows the main road and rail infrastructure which serves the city. The Brighton Mainline provides fast and frequent rail connections to Gatwick airport and London from several stations within the city. This rail line is also a cause of severance within the city with relatively few roads connecting east/west across it. The east and west Coastway rail lines provide links to smaller urban centers nearby; Lewes, Eastbourne, Worthing and Shoreham-by-sea.

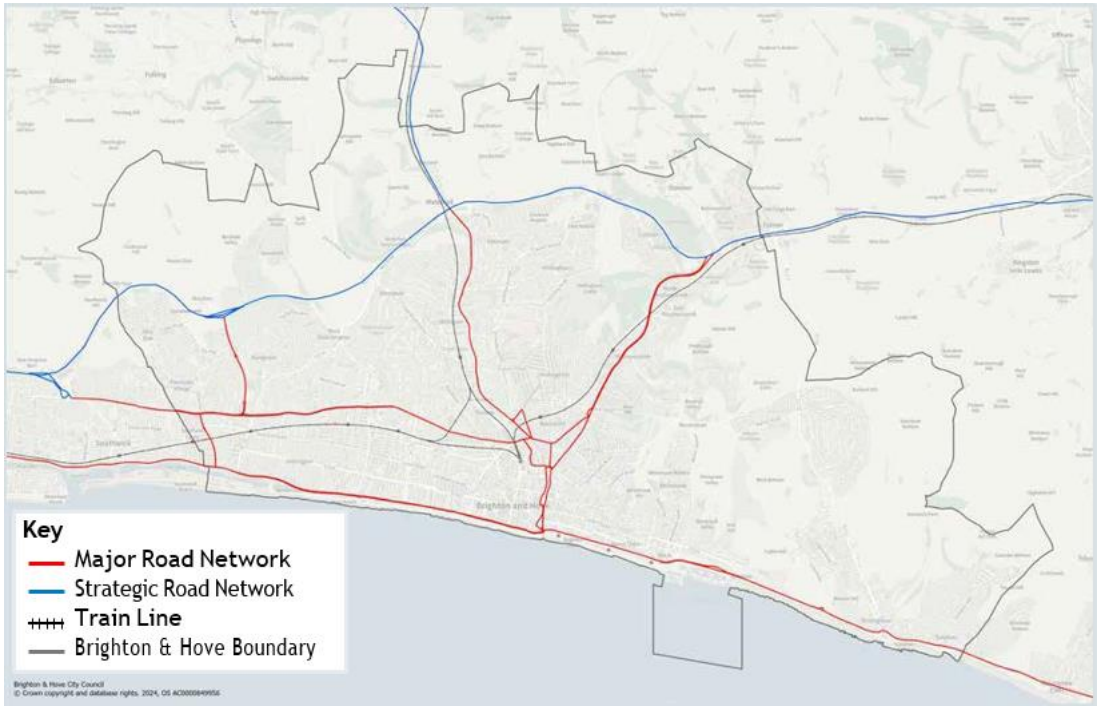


Figure 6: The strategic and major road network

The A27 skirts the northern edge of the city, acting as a bypass. The A23, running north/south through Sussex provides connections to Burgess Hill, Gatwick Airport and London. The main roads into the city from the north and northeast (London Road and Lewes Road) converge at the edge of the city centre and it is here that congestion is the most acute.

[6] Brighton & Hove City Council, 2021. Census results 2021

The transport challenges presented here are a summary of the findings of our analysis, which set out in greater detail in the accompanying evidence base document.

Challenge 1 - Enabling more people to live safer, healthier and more active lives

> **"If physical activity were a drug, we would refer to it as a miracle cure, due to the great many illnesses it can prevent and help treat".**
>
> UK Chief Medical Officers' Physical Activity Guidelines. 2019

Sedentary lifestyles contribute towards ill health. The NHS recommended that adults get at least 150 minutes of moderate intensity activity a week, or 75 minutes of vigorous activity, while children over six should try to do at least 60 minutes of moderate to vigorous intensity activity every day. Brighton & Hove is one of the better performing areas in the UK for physical activity, ranking 17th highest for physical activity amongst adults in England, but even so nearly 1 in 5 adults do less than 30 minutes of physical activity each week and fewer than half of children under 16 in the city meet recommended activity guidelines each day[7].

Brighton & Hove is a relatively compact city, with the city centre and other destinations within a short walk or cycle for many. Achieving recommended activity levels, and the subsequent health benefits, can come from simple changes to routines such as choosing to walk to school rather than take the car. There are a large number of short trips currently made by car which could be switched to active means. There is a large body of evidence that shows road safety fears are the main barrier preventing more people from taking up cycling[8]. Investment in better active travel infrastructure that provides high quality public realm and protected cycle lanes will open up the choice of cycling to many more people and not just those confident cycling in traffic. Better pavements in the city, that are free of obstruction, and attractive paths to access the national park on our doorstep will also make walking & wheeling an attractive option for short trips.

Schemes to provide protected facilities for cyclists on roads which carry a lot of traffic are currently ongoing on the A23 and A259. Phase 3 of the Valley Gardens scheme will deliver improved crossing facilities, higher quality public realm, protected cycle lanes and safer junctions. By creating streets and public spaces which enables and encourages active travel, by walking, wheeling or cycling, we create an environment where it is easier for everyone to incorporate physical activity into their daily routine. This will also assist with improving traffic flow, especially if car trips are removed from the network during peak travel times.

The delivery of better infrastructure and space for active travel could improve both the feeling of safety and reduce the number of collisions. While serious injuries or deaths caused by collisions on our roads are relatively rare, with 146 recorded in 2023, we believe this can and should be reduced further over the coming 10 years.

[7] Brighton & Hove City Council Physical Activity and Sport Strategy 2024 to 2034
[8] Cycling Embassy of Great Britain, 2020. Barriers to cycling

We commit to developing a Road Safety Action Plan that includes targets for reducing the number of people killed and seriously injured (KSI) on our roads. This is likely to focus on actions we can take to improve conditions for vulnerable road users; motorcyclists, cyclists and pedestrians. An initial assessment of KSI figures shows that in 2023 over half were pedestrians or cyclists. It is already the case that safety is the primary reason for some of the traffic schemes we undertake, and it is a consideration in all of them. Our continuous programme of Safer, Better Streets delivers smaller scale improvements in response to concerns raised by the public and collision data.

Challenge 2 – Reduce congestion on our roads

"A good transport network is not an end in itself, rather it is the means through which people and businesses live their lives and achieve their ambitions. The provision of a safe, reliable, resilient, responsive and efficient transport network can significantly expand the opportunities for success and encourage greater ambitions."

Road Investment Strategy 2:2020- 2025

There are an average of 108,000 daily trips originating within Brighton & Hove. While 73,000 of these trips begin and end in the city, 35,000 are to destinations outside of it. Approximately 30,000 trips are made into the city from the surrounding areas. The average delay on Brighton & Hove's local A roads is among the highest of any local authority outside of London. With 36% of emissions generated by private car trips of 5 miles or less[9] there is considerable scope to switch these journeys onto public transport, walking or cycling.

Figure 7 illustrates where congestion is most acute on the road network. It shows that delays are much greater on the local road network compared to the higher capacity strategic road network of the A23 and A27. Various junctions of the A27 can be affected by local traffic queuing to access Brighton & Hove. The local A road network is generally single lane and therefore has lower capacity. Delays tend to be worse closer to the city centre with the most severe delays of over 200 seconds per vehicle per mile occurring on:

- The A2023 between the seafront / Old Shoreham Road
- A2010 between the seafront and Seven Dials
- The A23, London Road, between St Peter's Church and Preston Circus.
- The A270, Upper Lewes Road and Viaduct Road, between Preston Circus and Vogue Gyratory

[9] WSP, City Science and Steer, 2024. Decarbonisation Baseline Report for Brighton and Hove

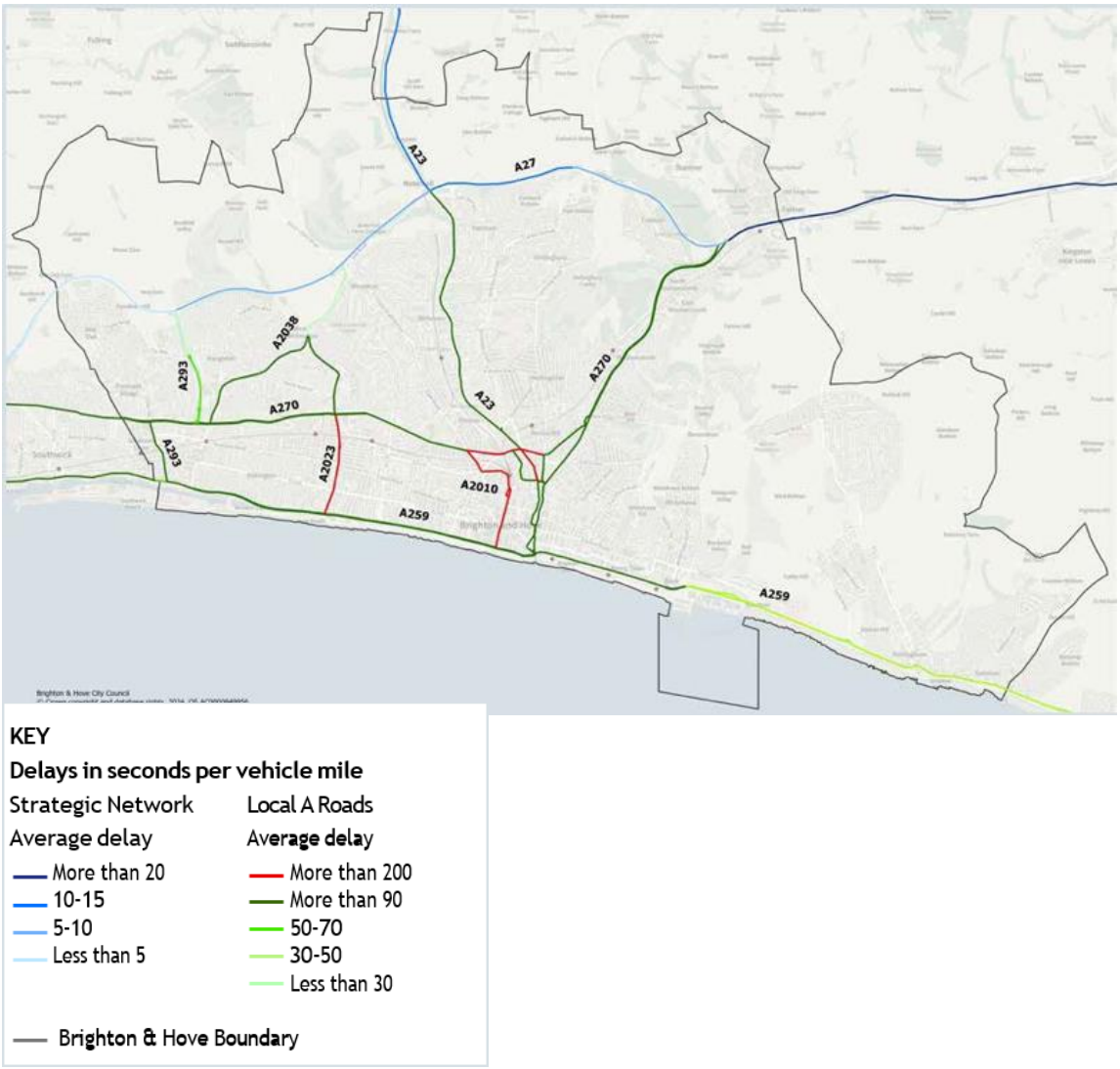


Figure 7: Average traffic delay on strategic roads in Brighton & Hove across 24 hours

In the built-up area of Brighton & Hove there is no available land for increasing road capacity without demolishing existing buildings. Even if it were possible to widen existing roads there is a sizeable body of evidence that increasing road capacity induces more traffic to use them rather than reduces delays. Instead, our approach is to increase how efficiently our existing road space is used. With buses and active travel being the most efficient modes of transport for moving people short distances in an urban area, the plan is to create additional bus and cycle lanes and to make these modes more convenient, faster and attractive relative to car travel.

Much of the data available to us focuses on weekday peak time congestion, when the road network is typically under the greatest stress. However, congestion also affects visitors to Brighton & Hove, particularly during the peak summer holiday season or when there are major events like Pride. With tourism being an important part of Brighton & Hove's economy, we want to ensure that getting here is hassle free for the estimated 11m visitors each year. Delivery of strategic mobility hubs at the edge of the city, which would have ~~include~~ Park & Ride at their core, would reduce the number of cars entering the city centre, where congestion is most acute, and improve journeys for all.

Key to managing congestion in the city lies in effective management of our road network, including through the Traffic Control Centre, this includes effective enforcement of Red Routes in the city to keep traffic moving along major routes serving the city. A challenge of this work is considering future technology and Artificial Intelligence (AI) solutions.

Challenge 3 - Supporting the transition to zero and ultra-low emission transport ~~vehicles~~

To reduce emissions from transport the preferred hierarchy of actions are to firstly eliminate the trip if it is not necessary, then switch to lower carbon modes, and if that is not possible, improve the emissions of private car trips. Because of the large number of trips that will still need to be made by private cars, switching away from petrol and diesel-powered vehicles is the single most important measure that will improve local air quality and reduce carbon emissions from transport.

~~For heavy vehicles there is still uncertainty about whether the switch will be to hydrogen or electric vehicles (EVs)~~ The transition to EVs for cars and vans ~~however, the switch to EVs~~ is already taking place, with battery EVs making up about a quarter of new sales. Central government has made it clear that local authorities have an important role in providing the necessary infrastructure for the UK to transition to electric cars and vans[10]. This is because EVs are commonly refuelled when parked.

Fifty-four per cent of households in Brighton & Hove have no access to off-street parking like a garage or driveway. If these households own a vehicle, then it will be parked on street. If the vehicle is an EV these households will largely be dependent on the publicly available charging network. As the manager of the roads and pavements in Brighton & Hove, the council has a key role to play in providing the necessary public chargepoints. Alongside Our City Transport Plan 2035, we are developing a dedicated Electric Vehicle Charging Plan setting out how we will address this challenge.

Because of the threat climate change poses, the UK Government, along with 195 other bodies, signed the Paris Agreement in 2015. This has the goal of holding the increase in global average temperature to well below 2°C above pre-industrial levels and avoiding the significantly more severe impacts arising from climate change.

> **"The fact is that no species has ever had such wholesale control over everything on Earth, living or dead, as we now have. That lays upon us, whether we like it or not, an awesome responsibility. In our hands now lies not only our own future, but that of all other living creatures with whom we share the Earth."**
>
> David Attenborough

The UK Government has committed to achieving Net Zero carbon emissions by 2050. This means that emissions will be reduced to as close to zero as possible with any remaining emissions offset by mitigating action. To assist with meeting these commitments the Committee on Climate Change (CCC) was established by the

[10] DfT and Office for Zero Emission Vehicles, 30 March 2023. Electric vehicle charging infrastructure: help for local authorities.

Climate Change Act 2008. This expert, independent body advises the UK and devolved governments on emissions targets and reports to Parliament on progress made in reducing greenhouse gas (GHG) emissions. It is the leading authority on how the UK can achieve Net Zero by 2050 and has published a large amount of research and guidance including the role ~~of~~ local authorities have to play and what transport specific actions we need to take.

Surface transport (which excludes flights) is responsible for 22% of the UK's GHG emissions[11], with the overwhelming majority of these from road transport. In Brighton & Hove transport is responsible for a third of the city's carbon emissions so is the key sector where action is needed. The action that will have the greatest impact on reducing our transport GHG emissions is switching vehicles to EVs as early as possible. This will also improve air quality in the city, as exhaust pipe emissions of Nitrogen Dioxide and particulate matter will be eliminated. Air pollution is covered in detail already in other policies[12].

GHG emissions explained

GHG refers to seven emissions that have a heating effect on the earth's atmosphere. The most prevalent are carbon dioxide and methane. GHG emissions from vehicles is overwhelmingly made up of carbon dioxide and the terms are used interchangeably in this document.

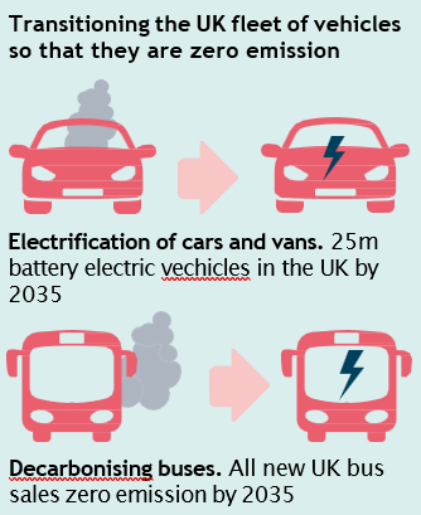
Figure 8: Brighton & Hove emissions by sector. Source - Decarbonisation Pathway Study

[11] CCC, December 2020. The Sixth Carbon Budget Surface Transport.

[12] Brighton & Hove City Council, October 2022. Air Quality Action Plan 2022 to 2027.

The CCC has produced a preferred 'Balanced Pathway' of how Net Zero is reached and published carbon budgets that cover 5-year periods. It is clear from this that the journey of how we get to Net Zero by 2050 is of vital importance. The most recent 6th Carbon Budget was published in December 2020. Under the CCC Balanced Pathway there are 3 key actions for road transport:

- Reducing travel demand and shifting journeys onto lower carbon modes
- Transitioning the UK fleet of vehicles so that they are zero emission.
- Making fossil fuel-powered vehicles more fuel efficient.



There were 38.7m cars and vans registered in the UK at the end of June 2024[13]. By 2035 25m, or 60% of the current fleet needs to be fully battery electric (not including hybrid vehicles). In Brighton & Hove there are currently 2,392 battery electric vehicles registered[13] as shown in Figure 9. This is out of a total of 111,700 vehicles registered in the city, meaning that 2.1% of the fleet is battery electric. Adoption of EVs varies considerably by region with more affluent areas adopting EVs much earlier. In 2023 16% of new car sales were EVs in the Brighton & Hove area, which is around the UK average; whereas in more affluent areas such as south-west London and Oxfordshire nearly 50% of new car sales were EVs.

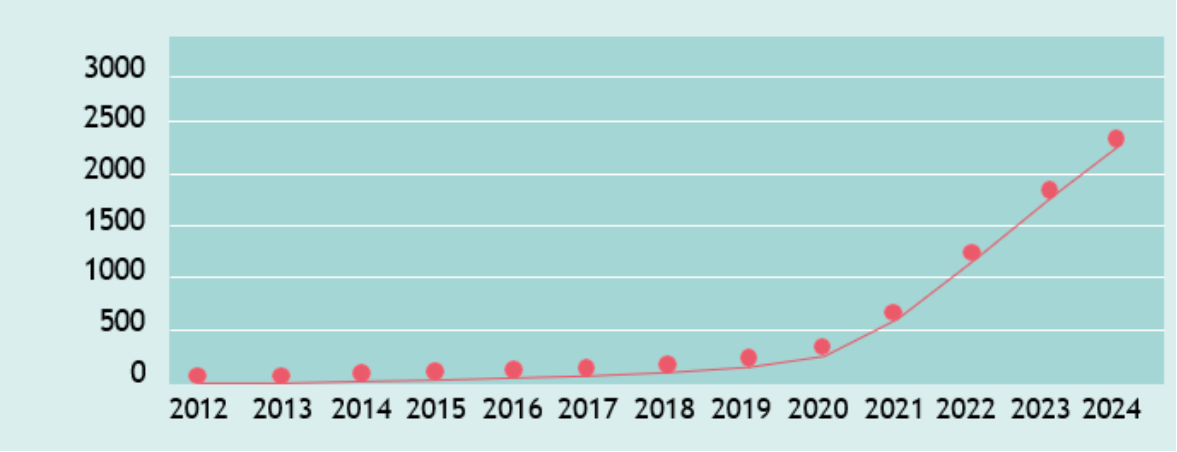


Figure 9: Licensed Battery Electric Vehicles (BEVs) in Brighton & Hove (June 2013 to June 2024)

The council's draft Electric Vehicle Charging Plan estimates that by 2035 there could be 64,000 EVs registered in Brighton & Hove. Depending on the type of chargers installed, the city may need up to 6,900 chargepoint sockets to cater for this demand.

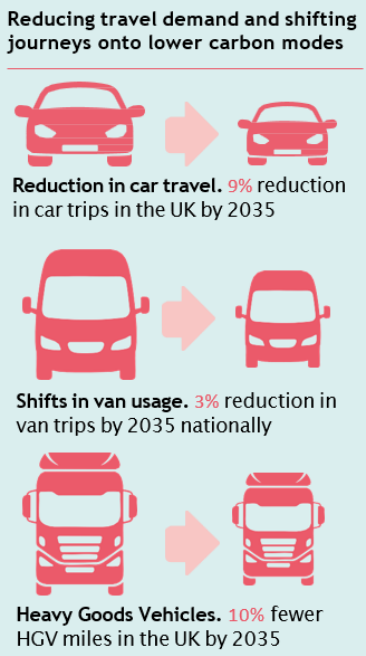
While electrification is established as the most likely way that cars and vans will decarbonise, there is uncertainty over the best way to decarbonise heavier vehicles. Both electric and hydrogen power are possible solutions. By 2035 about 33% of the UK's heavy goods vehicles (HGVs) and coach fleet (about 170,000) need to be zero emission and 67% by 2040[11].

Depots will need refuelling facilities, supplemented by refuelling points likely to be on

[13] DfT and Driver and DVLA, 24 September 2024. Vehicle licensing statistics data tables.

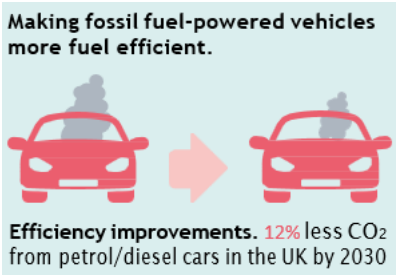
the main trunk network. As we are not responsible for trunk roads the council's main role will be in decarbonising our own heavy vehicle fleet, such as refuse collection vehicles and facilitating infrastructure at sites such as Shoreham Port and bus depots. There are now 72 electric vehicles in operation across the council[14]. The CCC states that all new bus sales will need to be zero emission by 2035. The council will have a role to play in decarbonising the local bus fleet. We will work with operators to provide any necessary on-street infrastructure, power cables and provide the regulatory framework for what kind of buses can operate on our roads.

Rapid electrification of the UK's car fleet will not be enough by itself to achieve Net Zero. Nationally a 9% reduction in car trips is needed. This will be delivered by fewer journeys being made (from greater homeworking for example) and car trips being shifted to modes such as active travel or public transport. Towns and cities are far better able to deliver modal shifts than rural areas because there is better public transport provision. Figures from the National Traffic Survey (NTS) show that around 71% of all trips are under 5 miles and two thirds of these are made by car or van[15], meaning there are a large number of trips which potentially can be shifted.



Internet shopping and home delivery services have, in part, been responsible for van usage increasing from 10% to 16% between 1994 to 2019[16]. In addition to electrifying the van fleet a 3% reduction in van use by 2035 is needed. HGV miles also need to be reduced by 10%. To deliver this, measures such as consolidation centers and last mile delivery to urban centers being undertaken by portering or e-Cargo bike can be effective. There is a lack of detailed local data on van and HGV usage trends in Brighton & Hove. This will be an area of future study to assess exactly what measures will be taken and to what extent the fleet can be decarbonised.

Under the CCC Balanced Pathway to Net Zero, new petrol and diesel vehicles need to improve fuel efficiency by 12% by 2030. This is not just about technological improvements to engines; it also includes trends in vehicle purchases. The popularity of larger heavier vehicles, such as SUVs, means that fuel efficiency has been getting worse. While manufacturers will largely be responsible for delivering this change, we can also incentivise the uptake of more fuel-efficient vehicles through emissions-based pricing for parking costs. The introduction of any emissions-based scheme will factor in, and mitigate, the impact on those on low incomes, with disabilities and other marginalised groups.



[14] Brighton & Hove City Council, 28 May 2024. Plugged in depot a first for zero emission fleet.
[15] DfT, 14 December 2023. National Travel Survey:2022
[16] DfT, 15 April 2021. Final Van Statistics April 2019 - March 2020

Challenge 4 - Creating a transport network that is more inclusive

> **"As a disabled person I have to think and plan far more than anyone else. If I want to catch a bus I have to consider whether the ramp works, whether there will be someone in the one space who doesn't want to move. It can be a constant worry."**
>
> Tanni Grey-Thompson

Our transport network reflects wider inequalities in our society, and it is a challenge to re-balance this to be more inclusive. We are committed to meeting our equalities duties towards groups with protected characteristics, under the 2010 Equalities Act, and to go beyond this to ensure that the less well-off are not unfairly excluded too. There are some stark differences in transport usage related to income.

Analysis undertaken by Transport for the North has assessed the risk of transport-related social exclusion[17]. This is defined as areas where households without access to a car face disadvantages in accessing essential services such as employment, education, health and banking. People in these areas may also be committed to owning a car, which is a stretch on their personal finances, but see it as the only viable way they can access these services.

During the public consultation the specific issue of transport-related social exclusion regarding access to secondary education was raised with the council. The distribution of schools across the city is uneven and in the east that results in some areas being within a single school catchment area. The council recently changed schools' admissions criteria to facilitate greater choice for those in single school catchments, and this was supported with a re-organisation of the city's bus services to make accessing schools easier. Cost of public transport remains an issue.

The main areas in Brighton & Hove where people are at risk are highlighted in red and dark red in Figure 10. This includes Woodingdean, Bevendean, Mile Oak, Hangleton, Coldean and Hollingbury. Building on this analysis the council have commissioned an analysis of bus services to understand how we can improve those areas at risk of social exclusion.

[17] Transport for the North, 22 September 2022. Risk of transport-related social exclusion

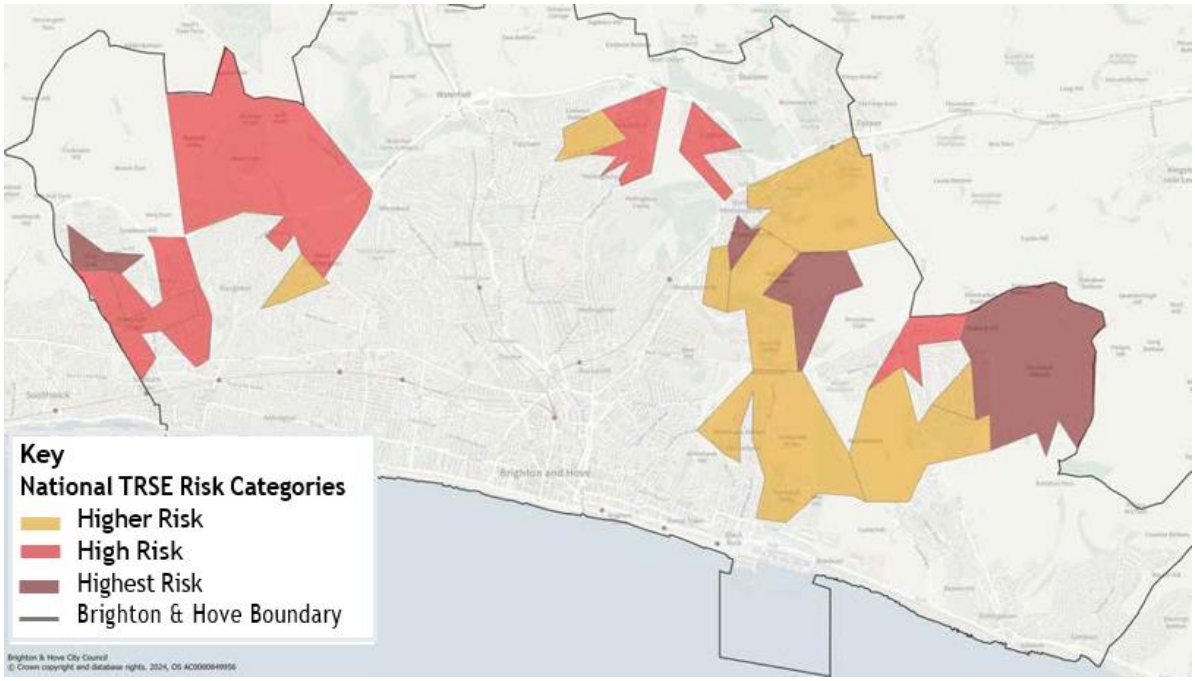


Figure 10: National transport related social exclusion risk categories map – Brighton & Hove

There are also marked differences in people's travel habits according to how wealthy they are. The UK has a very high level of income inequality compared to other developed countries. In 2022 20% of households with the lowest incomes had an equivalised disposable income of £13,218, while the 20% of households with the highest incomes had an equivalised disposable income of £83,687[18].

More affluent households make more trips than less well-off ones and there are large variations in the modes of transport used across different household income bands. The 20% of households in the lowest income bracket shown in Figure 11 typically make the most trips on foot and are the only income group that make more walking trips than car trips. For all other households walking is the second most frequent mode of transport after car[19].

Figure 12 illustrates that the more disposable income a household has the more car trips they make. The 20% of households in the highest income bracket make double the number of car trips than households in the lowest income bracket. The difference is even starker when looking at the distance travelled by household income. Both before and after the Covid pandemic (2019 & 2022), the most affluent households travelled three times further by car than the least affluent households.

[18] Equality Trust, 2022. The scale of economic inequality in the UK

[19] DfT, 28 August 2024. Travel by vehicle availability, income, ethnic group, household type, mobility status and NS-SEC. https://www.gov.uk/government/statistical-data-sets/nts07-car-ownership-and-access.

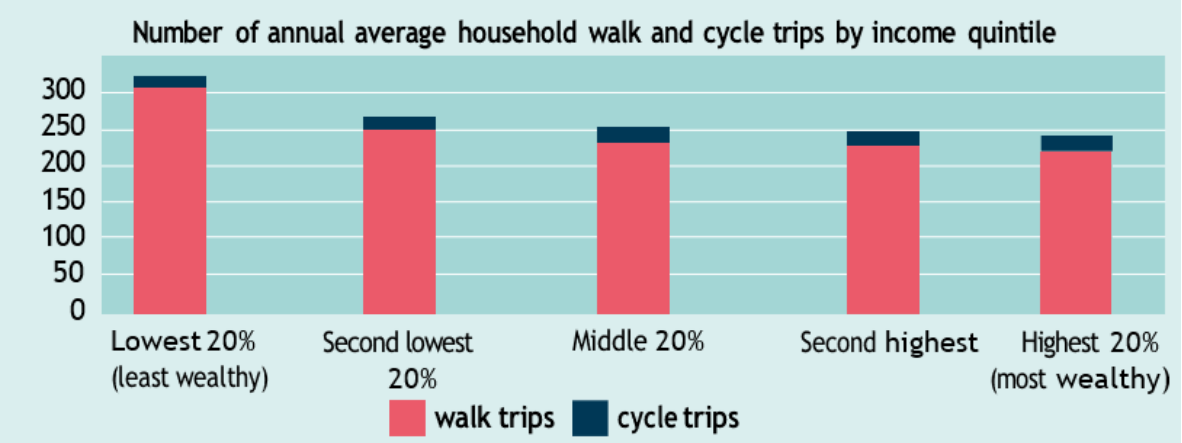


Figure 11: National household walking and cycling trips by income (National Transport Survey)

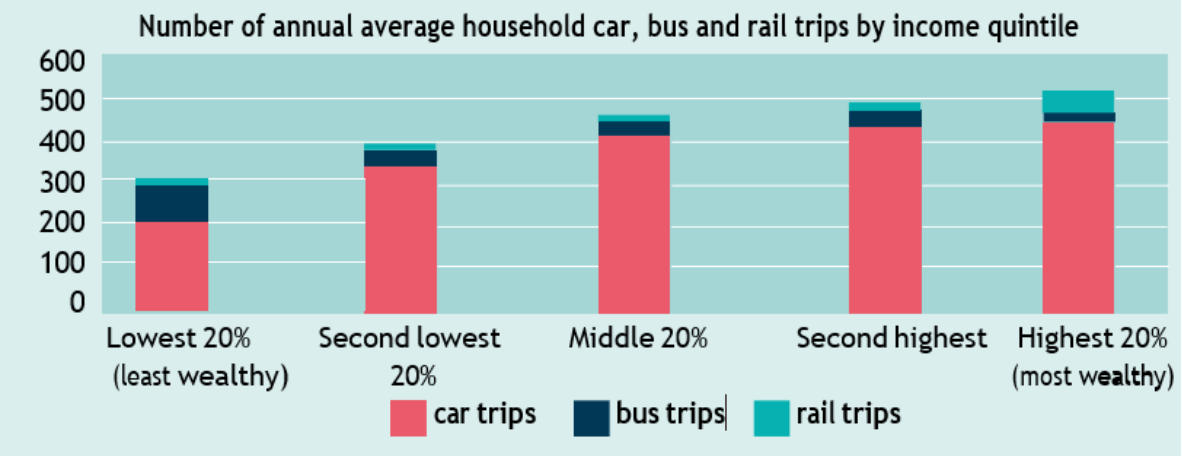


Figure 12: National household trips by mode and income (National Transport Survey)

Public transport accounts for far fewer trips per household, although this average will mask how important rail and bus services are for some households. Rail use is dominated by more affluent households with 41% of trips made by those in the most affluent 20% of households and just 11% made by those in the lowest 20%. The reverse is true of bus journeys with 33% of local bus journeys outside London made by people in the lowest income band compared with 9% by people in the highest income band.

Post-pandemic the number of cycling trips made annually is roughly equivalent to the number of trips made by rail, although rail travel may recover to pre-pandemic levels in time. Walking and cycling are the modes with the least pronounced variation by household income. While bus skews heavily to use by less well-off households and car and train to use by the most well-off households the lowest income households account for 16% of all cycling trips and 25% of all walking trips, while the highest income households account for 25% of cycling trips and 17% of walking trips. A transport network that prioritises walking and bus users is one that helps to make it more inclusive for all.

There is also a challenge to ensure that the transport network is inclusive for those with disabilities. Disabled people undertake far fewer trips than those without disabilities. Results from the 2024 National Highways & Transportation survey, which allows us to benchmark our performance against other local authorities, shows that disabled people scored access to services in Brighton & Hove in line with the

national average. However, at 62%, this is a full 11% points lower than the score given by disabled people in Brighton & Hove, who scored ease of access to services at 73%. The same trend is true regarding the ease of use of pavements and footpaths by disabled people. The score for Brighton & Hove is in line with the national average, but at 41% this is a low overall score.

During public consultation on this policy, we received feedback about specific issues. Some disabled people, who are reliant on cars for transport, felt that pavement widening in The Lanes made it harder to access the city centre because it reduced places that Blue Badge holders could park. Similar concerns were raised about Red Routes, although Blue Badge holders can be picked up or dropped off, so long as the vehicle is not parked. There were also concerns raised about cycle infrastructure, street clutter and the quality of our streets.

To address these concerns we commit to update our streetscape design guidelines which set the standards for the materials, street furniture and layout of our roads and pavements. The guidelines will be developed in close consultation with groups representing disabled people. The aim will be to improve the quality and consistency of street works and address specific accessibility concerns.

In addition to this we will dedicate funding to a rolling programme of accessibility improvements, that deliver simple improvements such as dropped kerbs at each road crossing point. This will make a big difference to people's lived experience when travelling around the city. We will also work with transport providers, such as bus companies, to identify what improvements are of most importance to disabled users. Through our BSIP programme we recently held focus groups with a range of bus users including LGBTQ, neurodiversity groups, Special Educational Needs & Disabilities (SEND) organisations, ethnic minorities, refugees, mental health community organisations. The council also uses its powers as a taxi licencing authority to implement policies that support the use of wheelchair accessible vehicles. Statistics from the Department for Transport for 2024 show that the percentage of wheelchair accessible vehicles in taxi fleets in England, excluding London, is 15.6% whereas in Brighton & Hove the figure is 45%. In private hire fleets the national figure is 5.2%, compared to Brighton & Hove's 19%[20]. We also regularly keep under review the provision of dedicated disabled bays in the city as well as responding to requests received.

Challenge 5 - Maintaining our roads and managing them as efficiently as possible

> **"An ounce of prevention is worth a pound of cure."**
>
> Benjamin Franklin

We know that the conditions of the pavements and roads in the city have been worsening. We regularly survey their condition and in 2023 commissioned a condition projection model to help make the case for greater investment. This model estimates the total value of our roads and pavements and how much annual

[20] DfT, 22 January 2025. Taxi and private hire vehicle statistics, England:2024(revised)

maintenance is required to keep the assets in good condition. It found that in Brighton & Hove, the value of the carriageway infrastructure is currently reducing by £6.9 million per year. In the financial year 2023/24 the allocation from Government for highway maintenance was approximately £2.9 million[21], which is 42% of the yearly wear and tear cost and only 0.3% of the total asset worth. This amount is insufficient to maintain them in good condition and is of high importance to the public[22].

While maintenance work is a challenge we use a data and technology-led approach to optimise how we spend the funds we receive to use it as efficiently as possible, and will look to more efficient ways of doing this in future with new technologies. The highway asset management plan guides where in the city will receive investment so that sections of road or pavement that is close to failing is maintained before this occurs. Reactive maintenance also takes place to deal with sections of road and pavement where potholes or other critical failures have to be addressed.

Pavement parking is a major issue in the city and we have campaigned to convince central government for a number of years to simplify how we ~~have the powers locally to be able to~~ enforce pavement parking. Currently, pavement parking enforcement is only possible where a defined scheme is in place. The council is seeking powers from central government which would mean that the default is for pavement parking to be banned, unless signage shows otherwise. This would make it easier for the council to keep pavements clear of obstructions and not be subjected to additional wear and tear from vehicle damage. Managing our fixed road space efficiently is an ongoing challenge and the council has a permit scheme in place to effectively manage the cities roads, the council intend to implement a Lane Rental scheme to manage the busiest sections of the road network when necessary works are taking place, with charges for the occupation of the carriageway and penalties for over-running works which impact on traffic flow and bus timings.

The good news is that there has been an increase in the dedicated funding we receive from central government for maintaining our roads and pavements in the most recent financial year. In 2025/26 central government awarded us £5.3m which is an increase of nearly 83% on the funding we received in 2023/24. We will continue to make a clear evidence-based approach for greater funding to deal with the backlog of maintenance work that needs to be tackled.

Vision, Objectives & our Capital Programme of work

Our vision for Our City Transport Plan 2035 is **getting around a cleaner, fairer, and growing city**. Having identified the main challenges the city faces we have set out six objectives that respond to them.

[21] BHCC Condition Projection Model Results. Oct 2023. Xais Asset Management

[22] NHT, 2024. 2024 NHT Public Satisfaction Survey Report - Brighton & Hove City Council - 92% said road condition was important to them, but only 22% said that they were satisfied with the condition of roads

Objective 1: Increase public transport use.

Objective 2: Enable the uptake and use of zero and ultra-low emission transport.

Objective 3: Deliver a safe, inclusive and integrated transport system.

Objective 4: Create well-maintained streets, pavements and rights of way.

Objective 5: Provide active travel choices for all and excellent public spaces.

Objective 6: Promote and use technology to reduce and manage travel.

Achieving these objectives will help to address one or more of the challenges that the city faces. For example, to address the challenge of reducing congestion there is no single solution. Instead, there are multiple actions we can take that will have a cumulative impact on reducing congestion; greater use of public transport, switching more journeys to active travel, increased home-working and re-timing of journeys outside of peak times.

Objective 1: Increase public transport use

The initiatives in this section focus primarily on buses, as the council has far greater scope to influence bus services within the city, than it has rail services.

Spotlight on Rail

The Brighton mainline is hugely important for residents who commute to central London by rail. It is the most popular destination from Brighton & Hove. Prior to the Covid pandemic overcrowding at peak times was a major issue but reduced passenger numbers in the peak post pandemic mean this has eased. Reliability and resilience of these services remains an issue. Trains travelling along the coastway, east and west of Brighton, must terminate at Brighton station because of the capacity constraints. A new platform at Brighton station would be needed to resolve this. Through-trains and faster, better timetabled services on the Coastway would strengthen economic links with neighbouring towns.

Rail infrastructure improvements are decided on by the DfT and the council has relatively little influence over what rail services are provided at the 8 stations in the city. For our voice to be heard we must work with other local authorities, and the new Mayoral Strategic Authority, to agree joint priorities. Short term priorities for rail are: ~~As a member of TfSE we work with other local authorities across the South East to lobby for improvements to benefit the wider region. In the short term the priorities are for:~~

- optimising fares, ticketing, and on-board amenities.
- refining timetables to support fast- growing markets like leisure travel and rescheduling maintenance to reduce disruption.

Longer term priorities are:

- improving resilience, reliability and capacity on the Brighton Mainline to London by removing bottlenecks and delivery of the Croydon Area Remodelling Scheme.
- upgrading the railway on the Brighton – Southampton coastal corridor to strengthen economic ties
- upgrading the eastern Coastway to improve line speeds and reliability.
- exploring Mass Rapid Transit (not necessarily rail) – express public transport services along the coastal corridor

Bus usage in Brighton & Hove is the highest anywhere in the UK outside of London, with 147 bus trips per person in 2023/24. There is still significant room for growth, as before the pandemic bus use was around 174 trips per person. Some studies suggest that remote working has significantly reduced the frequency of commuting trips[23] and this may be one of the reasons for the decline in bus trips per person in Brighton & Hove. In 2021 we created our first Bus Service Improvement Plan (BSIP) and were awarded £27.9 million by central government to improve bus services in the city and help ridership recover following the pandemic. At the same time, we

[23] DfT, 31 October 2024. Transport behaviours, traffic forecasting and long-term impacts of COVID-19

entered into an enhanced partnership with bus operators in the city to ensure closer working arrangements with clear targets, roles and responsibilities.

The BSIP funding is used to deliver a mix of physical infrastructure like bus lanes or Red Routes and subsidies to lower fares or provide bus services to areas where it is not commercially viable. Fare offers funded by BSIP include free travel for accompanied children and 50p off-peak travel for unaccompanied under 19s. Much of the new bus lane infrastructure has only recently, or is still in the process, of being delivered so it has not yet had an impact on journey times. Between 2019 and 2023 there was a 1.2% increase in journey times, based on monitoring of 20 unchanged routes operated by Brighton & Hove Bus & Coach company. Our aim is to reduce journey times by 5%, from the 2018/19 baseline, by 2024/25.

The new express 1x service, supported by BSIP funding, and operating on one of the heavily used routes in the city, saw journey time improvements of 28% over comparable services on the same route. A second express service, the 3x, launched in August 2025 and links the city centre with Falmer, Hove and Hangleton. The BSIP has been refreshed for 2025 and sets out what actions we will take up to 2030. Our understanding of what bus users want, and what we will therefore seek to deliver is:

- clearer and simpler tickets
- faster and more reliable journeys
- lower fares
- more frequent services to underserved parts of the city and the South Downs

Fuller detail on specific measures can be found in the BSIP document, but the actions include:

- investigating the feasibility of strategic mobility hubs to deliver Park & Ride on the edge of the city
- better bus shelters, accessibility improvements, new real time bus information and maps to assist with onward travel at bus stops
- applying equality and accessibility standards across all buses
- delivering more bus priority infrastructure including Red Routes, bus lanes and priority at signalised junctions
- discounted travel for young people
- making it easier to get the cheapest ticket
- better integration between bus operators, rail and cycle (including Bikeshare)
- more frequently supported bus services
- more express services

Spotlight on Park & Ride

Park & Ride would form a core part of any strategic mobility hub on the edge of the city. Anyone using their car to access the city could park on the edge of the city and continue their journey using a bus. TfSE have identified that strategic mobility hubs, which would include Park & Ride, are required at Falmer, Shoreham-by-sea and the A23/ A27 junction. Bus Service Improvement Plan (BSIP) funding is being used to help make the business case for Park & Ride and the creation of a purpose-built facility.

While this work is on-going the council is looking to see how existing car parks outside the city centre, that have spare capacity, can be used ~~alongside existing bus services~~ to provide some Park & Ride capacity to ~~improve traffic flow~~ reduce congestion in the short term. Recent public consultation on City Plan 2041 indicated strong levels of support for both strategic Park & Ride and local mobility hubs.

In summer 2025, the council ran a Park & Ride service at the University of Sussex campus on selected weekend dates. The aim was not only to support travel into the city during the busy summer period but also to gather feedback from users and the public to inform the development of a permanent Park & Ride facility. Learnings from the summer Park & Ride Satisfaction levels were high with users, and of those surveyed 81% would have driven a car or van into the city if the Park & Ride had not been available. We will continue to work with car park owners to both investigate the feasibility of a permanent Park & Ride scheme and provide affordable and sustainable Park & Ride facilities in the interim.

Objective 2: Enable the uptake and use of zero and ultra-low emission transport.

For car owners looking to understand how the council will assist them to switch to an EV, the council's draft Electric Vehicle Charging Plan, which is in development, will set out how the planned new charging infrastructure will be rolled out across the city.

- We will install a minimum of 1,650 public EV chargepoint sockets by March 2028 using the Local Electric Vehicle Infrastructure (LEVI) funding we have secured. We aim to install many more chargepoints than this by using our grant funding to attract additional private sector investment.

We will focus delivery on areas where households lack access to off street parking and ensure that distribution across these areas is equitable, with the aim of reducing the distance people have to walk to find their nearest chargepoint. In areas with Controlled Parking Zones (CPZs) the cost of parking permits is already based on emissions. We regularly review our pricing structure and will continue to use incentivising zero and ultra-low emission vehicles as a guiding principle of our pricing.

Spotlight on Parking Policy

The issue of how households without off-street parking recharge an EV illustrates how important our parking policy is in influencing people's transport choices and assisting in delivering the objectives of this plan. The availability of parking also affects people's transport choices. The city's 27 controlled parking zones (CPZs) are in place to manage parking demand on behalf of residents. Parking permits in CPZs are priced according to emissions, to encourage the uptake of ultra-low and zero-emission vehicles and support air quality objectives. The cost of using kerbside space for parking also varies depending on location and how accessible an area is by public transport. These considerations are balanced against the need to have a pricing structure that is simple and easy to understand.

The Council also manages off-street car parks. The pricing of our off-street car parks is designed to offer users choices of where to park, with those on the edge of the city centre offering lower prices to reduce city centre congestion. The parking team also manage the Blue Badge and concessionary travel schemes, which issues free bus passes to those over 66 and qualifying disabled people. Concessionary passes are funded from parking revenue surplus. Greater detail of our parking policy can be found in our Parking Annual Reports.

It is a priority for us to give additional assistance to taxi and private hire drivers looking to switch to EVs because these high mileage drivers have an outsize impact on local air quality and carbon emissions. We will provide additional dedicated taxi-only chargers and explore what opportunities devolution and local government reorganisation offers to work collaboratively with other taxi licensing authorities to harmonise environmental standards. We want to ensure that locally licensed taxis are not at a disadvantage if higher environmental standards are required.

Environmental standards for taxis and private hire vehicles can be set as part of the license. This would be an effective tool to speed up the adoption of zero emission vehicles, but taxis and private hire vehicles licensed elsewhere are able to ply for trade in Brighton & Hove. If they are not subject to the same environmental standards, locally licensed taxis will be at a disadvantage and we want a level playing field.

The council sets the terms of operation for car clubs in the city, which provide flexible and conveniently located hourly car hire across the city. Some of the new chargepoints we install will serve car club bays. Once in place we will require operators to ensure that half of their fleet is EV by 2028. Like taxis, car club vehicles are high mileage vehicles, seeing more intensive usage than the average privately owned car so switching these fleets to be zero emission has a greater impact on air quality and carbon emissions.

The Brighton & Hove Bus Ultra-Low Emission Zone (ULEZ), which is in operation on Western Road and North Street, has been responsible for improving bus emissions by ensuring that all buses travelling through the ULEZ meet the highest Euro VI standards for diesel engines. The new challenge is to see the bus fleet convert to be zero emission. The council, in partnership with Brighton & Hove buses, has secured funding from the second round of central government's Zero Emission Bus Regional Areas fund (ZEBRA2). This will pay for the electrification of Hove bus depot and by

2028 there will be 29 zero emission buses in the city. The depot electrification will allow for future buses to be electrified once the performance of the initial batch has been assessed.

The council contracts Beryl to operate the city's bike hire stations. This was launched in March 2023 and there are now 780 bikes in the fleet with 60% being e-bikes. By May 2025 we will have 108 bike hire hubs across the city, meaning the bike hire scheme is the most comprehensive the city has ever seen. The electric bikes make travelling up hills much easier, which opens new journeys and widens the appeal of the scheme.

~~There is the potential to~~ The council are currently consulting on whether to widen the hire scheme to include e-scooters.~~, although this is dependent on central government permitting their use. Once national legislation is in place, elected members will then decide whether e-scooters will be added to the scheme.~~ While private e-scooters are illegal to use, the government has allowed trials of hire schemes in England since July 2020. Hire schemes can be better regulated, requiring that e-scooter users must hold a driving license for example. Hire scheme operators can use geofencing to ensure they are parked in designated locations and can limit the speed of the scooters.

A survey conducted by Collaborative Mobility UK (COMOUK)[24] of people who use e-scooter hire schemes; half of active users travel to work or school using them. 21% said they would have used a car for their most common e-scooter journey if shared e-scooters had not been available. E-scooters can complement public transport if hire locations are co-located with bus stops. This can form the basis of neighbourhood mobility hubs. If scooters replace car trips, they will contribute to reducing carbon emissions.

Objective 3: Deliver a safe, inclusive and integrated transport system

To deliver the safe element of this objective we will:

- produce a Road Safety Action Plan with targets and actions to reduce the number of people killed and seriously injured on our roads
- update our Streetscape Design Guidance
- deliver targeted highway improvements at collision hotspots, schools and where issues have been highlighted by the public

The Road Safety Action Plan will review what measures have been successful elsewhere, investigate what the specific safety issues are on Brighton & Hove's roads. It will then have clear actions to improve safety that will be delivered through our capital programme. There are already projects within the capital programme that are focused on improving safety such as the Safer, Better Streets and School Streets programmes. The action plan will identify what additional actions are required.

To ensure we have an inclusive transport system we will:

- deliver an annual programme of accessibility improvements for pedestrians
- allocate £300,000 per year from BSIP funding to deliver accessible and safe bus stops

[24] COMOUK, 5 May 2025. Annual Shared Micromobility Report UK 2024

- work with transport providers to deliver improved outcomes for disabled passengers

We have greater influence and control over bus infrastructure, which is why we can commit funding to improve bus stop accessibility, but disabled access to the rail network is equally as important. We will seek opportunities and funding to improve access at rail stations in the city, through funding programmes such as Access for All. In addition to working at bus stops we will provide annual funding for dropped kerbs and other accessibility improvements on our pavements. We will review our streetscene guidance and publish updated Streetscape Design Guidelines to standardise our approach to providing street trees so that the impact on pavement width and condition is minimised. As street trees that are the cause of pinchpoints or uneven pavements reach the end of their life, any replacements will give greater consideration to their impact on the usability of our streets.

To improve the integration of our transport system we will:

- create neighbourhood mobility hubs that improve the interchange between public transport and other modes

Neighbourhood mobility hubs can include bike, e-scooter or car hire (through car club provision), bus stops or train stations. Integration refers to both the co-location of transport provision and the ease of use between different modes of travel. Ticketing is an area which can be greatly improved with simpler fares and access. One good example of the ease of access to low fares is the use of ‘tap on and tap off’ payment on buses being harmonised with the mobile and smart ticket offer so that users get the lowest priced ticket for their journey with minimal effort. Integration of payment and ticketing across different modes of transport is an area where much can be done. Neighbourhood mobility hubs will be created from 2029 onwards.

Objective 4: Create well-maintained streets, pavements and rights of way

To deliver this objective we will:

- dedicate funding to improving the look and feel of the city.
- lobby central government for the necessary increased funding
- deliver an annual maintenance programme which maximises the lifespan of our assets
- improve lighting on important active travel routes
- ensure that active travel routes are included in winter maintenance schedules
- continue to lobby central government for pavement parking enforcement powers

The increase in funding available for maintenance in 2025/26 is welcome. We will continue to use our evidence base about the condition of our streets to make the case for adequate levels of maintenance funding. With the resources that we do receive we will use this efficiently to keep our streets in the best condition possible. We will continue to invest in our street lighting and where funding allows improve lighting where required on well-used active travel routes.

The public consultation revealed that there was very strong support for this objective and as a result we have looked at how we can use our capital funding to support this

objective. Our project to ‘Improve the look and feel of the city’ will be focused on prominent areas and seek to deal with issues around tackling uneven pavements, greening and other public realm enhancements.

As part of our winter maintenance plan, we maintain a list of roads that are a priority for gritting to keep them clear. As new protected cycle routes are added we will make provisions for how these are kept clear in the winter and ensure that pavements on the most important active travel routes are considered in the maintenance schedules.

Objective 5: Provide active travel choices for all, and excellent public spaces

To deliver this objective we will:

- deliver city centre walkability and accessibility improvements
- enable car club growth with a more flexible model
- provide secure residential cycle parking facilities
- deliver active travel infrastructure enhancements on the A259 and A23 corridors by 2028
- deliver area wide and priority corridor active travel improvements identified in the LCWIP
- continue to deliver improvements to routes and paths that provide access to the national parks

Once Valley Gardens Phase 3 is completed, the area in front of the Royal Pavillion will be pedestrianised and become an attractive space for visitors and residents to enjoy. We want to transform the experience of using the city centre in other key locations, such as routes between the train station and seafront, and in popular retail areas. Covid-era projects have provided additional footway space in the Old Town but over the life of this plan we will develop schemes that provide excellent public spaces to support our visitor economy and improve the accessibility of the city centre.

To support active travel choices, we will enable car club growth by introducing a more flexible model that does not depend on dedicated bays but permits that allow vehicles to be parked in a wider area, rather than a fixed spot. This will reduce the cost of providing car clubs, which will open up the city to new operators and allow the introduction of vehicles to new areas.

The secure on-street residential cycle parking we have introduced has been very popular, with long waiting lists for many locations. We will continue to provide this parking and seek opportunities to expand the number of spaces available. Our current priority for active travel improvements is on the A259 and A23 corridors. These are identified in the LCWIP as priority routes. Once these are completed, and linked up by the Valley Gardens project, we will identify which priority corridor routes, already identified in the LCWIP, are to be delivered from 2028 onwards.

The LCWIP also sets out where area-wide, as opposed to corridor, improvements are desired. Our Rights of Way Improvement Plan contains details of what the priorities are for footpaths and access to the national park. Funding to deliver these projects will be identified from 2028 onwards and, in the case of area wide

improvements, could be combined with accessibility improvements for an area.

Objective 6: Promote and use technology to reduce and manage travel

Technology has great potential to improve transport in the city. Connected and driverless vehicles are likely to be on our roads in some capacity by 2035. We welcome innovation and will look to be early adopters of it. The council will not be investing or developing our own technology, rather working with the private sector to deploy technology that can deliver the objectives in this plan.

Our immediate focus is on:

- improving the availability of live parking and bus information
- ~~investigating whether the National Parking Platform can deliver improved customer experience and cost savings for the council~~
- investigating how we can tackle the issue of drivers needing multiple parking apps across different local authorities.
- replacing end-of-life signals with units that optimise traffic flows
- utilising technology to improve data collection, customer experience and enforcement, including the use of Artificial Intelligence (AI)
- utilising the Traffic Control Centre for innovative approaches to keep traffic moving in the city including for Red Routes
- seeking powers for Moving Traffic Enforcement from central government

We are in the process of updating the real-time bus information displays at bus stops and will look to make live parking availability information more widely available so that those seeking parking spaces can easily find correct and up to date information. An irritation of modern car driving is the multitude of parking apps needed to pay for parking at different locations. ~~The National Parking Platform was designed to solve this by acting as the platform which hosts multiple providers in one place.~~ We want to solve this issue and are interested in the potential the National Parking Platform ~~this~~ has to improve ~~customer experience for~~ drivers experience of parking. We will investigate how this could be introduced.

As we replace traffic signals in the city, we have already installed smart versions that are designed to respond to live traffic flows. There is also the potential for them to identify and prioritise buses as they approach. Other technology that is helping to improve bus journey times is the camera enforcement on the recently installed Red Routes. This is much more efficient and effective than relying on Civil Enforcement Officers to patrol our key transport corridors. We will seek powers from central government for Moving Traffic Enforcement, which will give us authority to effectively enforce restrictions on our network, such as School Streets and key sections of our road network. The council has recently completed a Strategic Transport Model for the city which relies on anonymised mobile phone data to understand the traffic flows into, within and out of the city. We will continue to use technology to improve our data collection and understanding of travel patterns.

Capital programme of work 2025/26

Each year we will produce a capital programme of work that is focused on delivering the objectives of Our City Transport Plan 2035. ~~The funding~~

~~allocations to the programme of projects / schemes shown on the next page have been agreed for the current financial year 2025/26.~~ The table below shows an indicative capital programme of transport projects for the coming three years. Our capital programme is largely funded from a variety of external grants, explained below. Because of this, the transport capital programme is subject to confirmation each year, via a cabinet decision, once the exact level of our grant funding is known. At the time of writing the biggest unknown is the funding we will receive for maintenance from the Local Transport Grant.

To support this capital programme some funding from the consolidated active travel fund (CATF) is used on complimentary behaviour change programmes. This includes Bikeability cycle training for children and adults, working with schools and businesses to promote modal shift and other ~~promotional~~ activities to support active travel.

Primary Objective	Project/ Scheme	Description	Funding allocations (£000's) 2026/27	Funding allocations (£000's) 2027/28	Funding allocations (£000's) 2028/29
Increase public transport use	Bus priority and targeted fare subsidies.	BSIP funded bus lanes, bus priority and accessibility and subsidies for targeted fares and support for new routes	£8,817	£8,542	£8,281
Enable the uptake and use of zero and ultra-low emission transport	EV Chargepoints	On-street EV chargepoints for residents, taxis and businesses	£903	£903	£0
Deliver a safe, inclusive and integrated transport system	Improving accessibility	Dropped kerbs accessibility programme and delivering the Public Right of Way improvement and maintenance	£610	£610	£910
	Improving accessible cycling	Bike hire facilities and cycle parking development			
	Targeted Safety Improvements	Safer Better Streets, School Streets and School Travel Plan measures, Collision Reduction, vehicle safety barriers,			
	Mobility hubs	Creation of strategic and neighbourhood mobility hubs			
Create well-maintained streets, pavements and right of ways	Carriageway maintenance	Renewals and an ongoing Seek and Fix programme	£5,283	£5,283	£5,283
	Pavement maintenance	Renewals and an ongoing Seek and Fix programme			
	Drainage, structures and lighting maintenance	Covering gullies, pipes, retaining walls lamp-columns, in-fill works on major roads and maintaining accurate data			
Provide active travel choices for all and excellent public spaces	Supporting active and inclusive travel	Delivering our LCWIP – including the A259 active travel scheme	£2,566	£2,580	£2,588
	Delivering major schemes	Major Projects match funding, Project Management support and delivery of Section 106 schemes			
	Improving the look and feel of the city	City centre renewal - road, pavement and signage enhancements, pothole prevention			
Promote and use technology to reduce and manage travel	Traffic signals	Traffic signal upgrade, maintenance and network improvement programme.	£150	£150	£150
	Future scheme development	Funding for business case development, policy creation, scheme development – e.g. mobility hubs and road network studies	£297	£297	£297
		Grand Totals	**£18,626**	**£18,365**	**£17,509**

Primary Objective	Project/ Scheme	Description	Funding allocations (£000's) 2028/29
Increase public transport use	Bus priority and targeted fare subsidies.	BSIP funded bus lanes, bus priority and accessibility and subsidies for targeted fares and support for new routes	£9,280
Enable the uptake and use of zero and low emission vehicles	EV Chargepoints	On-street EV chargepoints for residents, taxis and businesses	£903
Deliver a safe, inclusive and integrated transport system	Improving accessibility	Dropped kerbs accessibility programme and delivering the Public Right of Way improvement Plan	£200
	Improving accessible cycling	Bike hire facilities and cycle parking development	£125
	Improving safety	Safer Better Streets, School Streets, Plan Measures and Collision Reduction School Travel	£415
Create well-maintained streets and pavements	Carriageway maintenance	Renewals and an ongoing Seek and Fix programme	£3,950
	Pavement maintenance	Renewals and an ongoing Seek and Fix programme	£628
	Drainage, structures and lighting maintenance	Covering gullies, pipes, retaining walls lamp-columns, in-fill works on major roads and maintaining accurate asset data, historic	£555
Provide active travel choices for all and excellent public spaces	Supporting active and inclusive travel	Delivering our LCWIP - including the A23 & A259 active travel schemes	£1,200
	Delivering major schemes	Valley Gardens Phase 3 (match funding)	£728
Deliver a safe, inclusive and integrated transport system **Create well-maintained streets and pavements** **Provide active travel choices for all and excellent public spaces**	Delivering major schemes (support)	Project Management Support and delivery of Section 106 (developer contributions secured through planning) sustainable transport schemes	£415
Promote and use technology to reduce and manage travel	Traffic signals	Refurbishment of signalised crossings/junctions	£150
		Grand Totals	**£18,549**

Table 2: 2025/26 capital programme

Transport funding explained

The transport projects set out in the capital programme are funded through a mix of central government grants, often ringfenced for specific uses, and money from the council's own budget. Our main income streams and their restrictions are explained below:

Bus Service Improvement Plan (BSIP): First introduced in 2022/23, and covering three years up to 2024/25, this central government grant is for both capital schemes (like bus lanes) and revenue schemes (like subsidised fares for children). We were awarded £27.9m in 2022. In the second phase of BSIP funding, which covers one financial year, 2025/26, we were awarded £9.1m.

Local Electric Vehicle Infrastructure Fund (LEVI): We secured £3.3m from central government's LEVI fund, which is ring-fenced for EV chargepoint sockets. This funding is to be spent over the coming three years 2025/26 – 2027/28. After this it is envisaged that the council's network of chargepoints will be self-financing.

Consolidated Active Travel Fund (CATF): Administered by the central government body Active Travel England the CATF was introduced in 2025/26 to replace separate funds for infrastructure and behaviour change schemes that promote modal shift to active modes. In 2025/26 the council was awarded £1m.

Local Transport Grant (LTG): Introduced in 2025/26 this replaces the Integrated Transport Block (ITB). The LTG, like the ITB, is determined by a formula (central government set a national budget and this is then apportioned to local authorities based on population and deprivation levels). The grant is provided for maintenance and delivering new schemes, with central government deciding how much of the grant can be spent on each. LTG funding announcements cover a three-year period to give local authorities better long term funding certainty. Capital and resource allocations, for delivering new schemes, have been announced but the grant for maintenance is yet to be set. In 2026/27, and each of the next two financial years we will receive around £3.4m

Parking Surplus: Any surplus from income generated by penalty charge notices or parking permits is ring-fenced for transport use. Typically, this is used to pay for bus passes that older people qualify for. A detailed breakdown of spending is provided in an annual report.

Section 106: This funding is received from developers when they build a new development that will require changes or mitigation to the transport network in the vicinity of the development.

Community Infrastructure Levy (CIL): The CIL is a charge which can be levied by local authorities on new development, for example new residential and office spaces to pay for infrastructure across the city. This includes transport improvements (such as cycleways, bus stops and roads) schools, and other facilities.

~~**LTP Highway Maintenance Block & Integrated/Sustainable Transport Block:** Each year we receive a Local Transport Plan allocation from central government, and this is split between funding we can spend on maintenance and funding we can spend on delivering new schemes. This is the grant that we have the most power in determining what it is spent on. The level of funding we receive is determined by a formula (central government set a national budget and this is then apportioned to local authorities based on the road length they manage and other criteria). Historically this funding would be set for a three-year period, but post pandemic allocations have been annual, making medium term planning more difficult. In 2025/26 we have been awarded £5.3m for maintenance and £3m for new schemes. The maintenance allocation is a substantial rise from the £1.5m awarded in 2024/25.~~

BSIP funded bus lanes, bus priority and accessibility, subsidies for fares and routes. These projects are funded by a grant dedicated to delivering our Bus Service Improvement Plan (BSIP - see above box; transport funding explained). We aim to improve bus journey reliability and grow bus usage. A detailed Bus Network Review has been used to prioritise which schemes can best meet this aim. A full list of schemes was included in a March 2025 report. Designs have already been consulted on for important bus corridors on Marine Parade (A259) and the A23 in Patcham and further schemes will be brought forward. The BSIP grant has also allowed us to fund the launch of new services, such as the 1x bus, provide on-going funding for bus routes to areas of the city where a commercial service is not viable and deliver targeted fare subsidies, such as those which exist for young people in the city. This is in addition to the funding for concessionary fares for older people, which is paid from the council's own budget, typically from parking surplus. BSIP funding has been allocated to assist in identifying and bringing forward existing car parks that are suitable for Park & Ride operations. While the immediate focus is on setting up Park & Ride facilities to ease congestion in the city centre in future years this project can look at improving neighbourhood mobility hubs that allow for better integration of public transport with other modes.

EV Chargepoints. This project is funded from LEVI money (see above box; transport funding explained). Brighton & Hove already has one of the densest networks of public chargepoints in the UK, with the vast majority of households who lack access to off-street parking, already within a 5-minute walk of a chargepoint. This project will deliver a minimum of 1,650 sockets and provide even more convenient access to public chargepoints for those who need them most. Our Electric Vehicle Charging Plan, which is in development, sets out in detail our approach to delivering this infrastructure.

Improving accessibility. This project provides dedicated funding which allows us to meet resident requests for small scale accessibility improvements such as handrails and dropped kerbs to make crossing the road easier. It also funds improvements on our network of paths which link the city to the South Down National Park.

Improving accessible cycling. This project will allow for continued provision of residential cycle parking storage and the city's bike hire stations.

~~**Improving safety**~~ **Targeted Safety Improvements.** This project provides funding for safety focused schemes such as the Safer, Better Streets programme, whereby

schemes are developed in response to issues raised by residents that are supported by councillors. It also covers work on School Streets and supporting schools to create School Travel Plans. It will also fund a programme to ensure vehicle safety barriers in the city are located in the right place and meet required standards.

Mobility Hubs. Initial business case development for a strategic mobility hub, with Park & Ride as a central feature, will be funded from the future scheme development budget. The business case will identify a preferred location and any supporting measures needed to make the scheme a success. This will also develop pilot neighbourhood mobility hubs. Dedicated funding provision for mobility hubs in 2028/29 has been made on the assumption that progress has been made on the strategic case for park and ride and more significant funding is needed to progress the scheme further.

Maintenance. Three projects are dedicated to maintaining our roads, footways and associated infrastructure like drains and lighting. All are delivered using ~~LTP~~ LTG maintenance funding. Detailed condition surveys for our highway assets are used to direct where the limited funding can achieve maximum value for money. For many years the level of funding available for maintenance means that our highways have been in managed decline. The level of maintenance funding shown will arrest this decline.

Supporting active and inclusive travel. This project seeks to deliver the improvements set out in the Local Cycling & Walking Infrastructure Plan using ~~LTP~~ LTG and CATF grants (see above box; the council funding explained). The immediate focus is on delivering infrastructure on two priority corridors; A259 and A23. This will create improved pedestrian facilities and cycle lanes that are protected from traffic, making cycling accessible to a far wider range of people who might not cycle on roads with heavy traffic. The Consolidated Active Travel Fund also provides funding to support behaviour-changing initiatives that the council provides, such as offering schools free cycle training.

Delivering major schemes. Our immediate focus is on completing the third phase of the Valley Gardens project, which will deliver a transformed public space around key visitor destinations, Brighton Pavillion and Palace Pier, in the city centre. Funding for this project has come from the ITB ~~LTP~~, the council's own resources, and the Local Growth Fund. The scheme features a simplified road layout, a better experience for public transport users and improved spaces for pedestrians and cyclists. The completion of the Valley Gardens project will see a priority north/south active travel route connected to the seafront east/west routes which are all part of the National Cycling Network (NCN). This funding ensures the necessary project management and design work is in place to both develop and oversee the delivery of schemes that are detailed above and schemes that are funded by funding secured from developers, as part of their planning permission.

~~A future priority will be city centre improvements, including to the public realm and the access arrangements, particularly for pedestrians.~~

Improving the look and feel of the city. The objective of 'creating well-maintained streets and pavements' gained the most public support during the consultation. In response we have brought forward delivery of this project to improve city centre walkability and expanded its scope beyond the city centre. We want to make sure

our city is accessible to everyone who is walking and wheeling. By renewing our streets we have tackle accessibility issues, add more greenery and other enhancements to make Brighton & Hove a place that people want to visit.

~~**Delivering major schemes (support).** This funding ensures the necessary project management and design work is in place to both develop and oversee the delivery of schemes that are detailed above and schemes that are funded by funding secured from developers, as part of their planning permission.~~

Traffic signals. This project funds the upgrade of traffic signals with intelligent systems that respond to live traffic flows. This smooths the flow of traffic and improves journey times.

Future scheme development. This funding stream will be used to make the case for major schemes such as Mass Rapid Transit and Strategic Mobility Hubs at the edge of the city. Delivery of these projects will require external funding and to secure this we need to demonstrate that the projects would be good value for money. It will also be used to undertake network studies of roads to identify how congestion can be tackled. New policy documents such as the Road Safety Action Plan and Streetscape Design Guide will be delivered from this funding.

Capital Programmes beyond 2028/29 ~~2025/26~~

~~Levels of funding beyond 2025/26 are not known. Currently central government confirms an annual funding allocation before the start of the new financial year. The council's Cabinet then decides how to apportion funding between projects. This process may change because the council, along with East and West Sussex County Councils are part of the devolution priority programme. This will create a Mayoral Strategic Authority, a new government body, which may have responsibility for strategic transport across Sussex, Brighton & Hove. It is expected that a mayor will be in place by 2027.~~

~~The final version of Our City Transport Plan 2035 will set out a three year delivery plan up to financial year 2028/2029~~

We have set out in Figure 13 below the schemes that we aspire to deliver through our annual capital programmes over the course of this plan. ~~Some~~ Schemes described as on-going programmes already exist and ~~are existing ones that~~ we plan to continue throughout the 10-year life of this plan. Typically, these involve the provision of a service such as our planned roads maintenance, subsidised bus routes, bike hire and behaviour change schemes. Also included are some projects such as our Improving accessibility and Improving safety projects, which tend to be smaller scale changes to the highway. Larger projects which alter road layouts or use are shown as individual schemes with a proposed start and finish date.

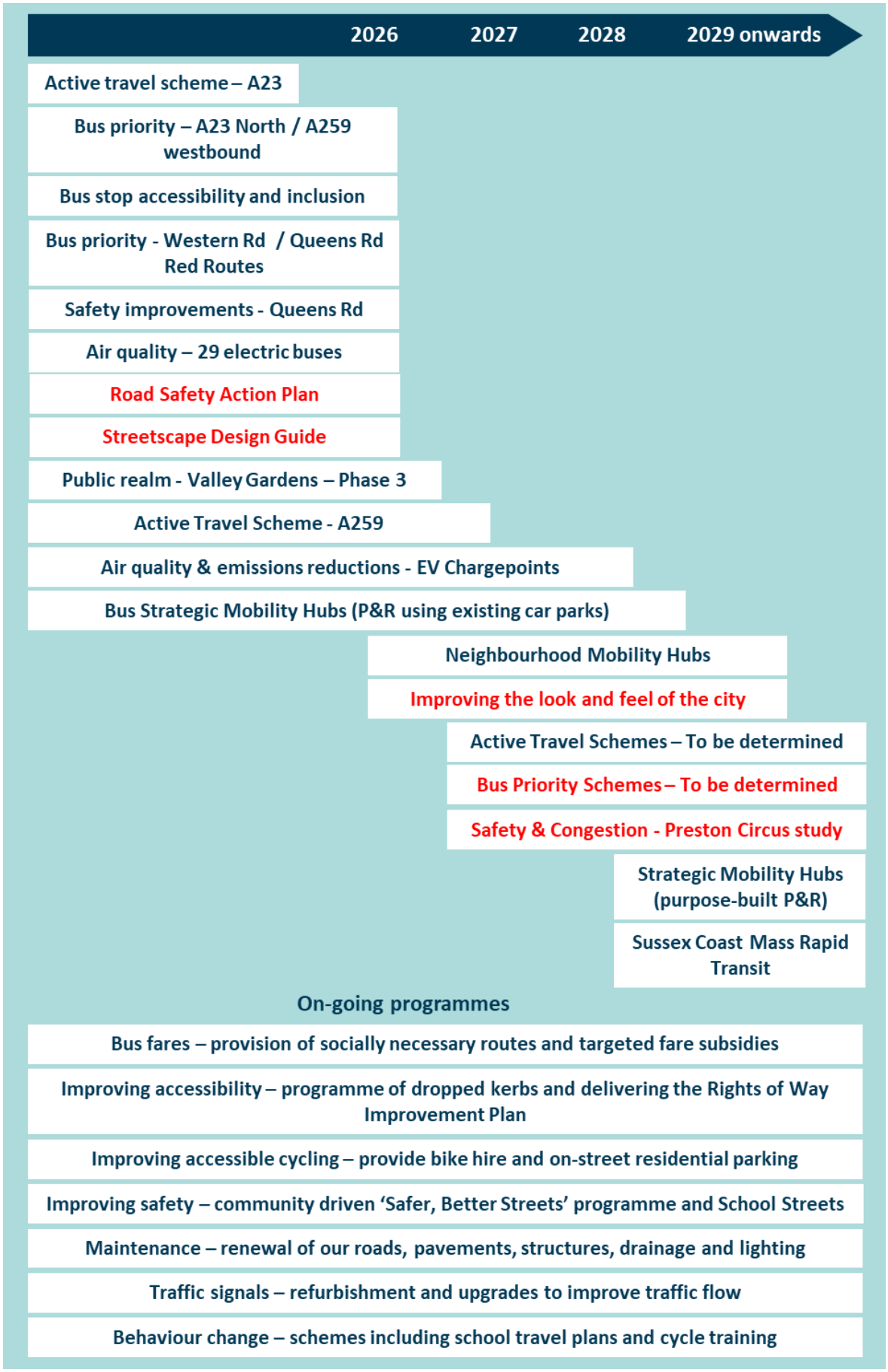


Figure 13 Summary of capital projects and ongoing works proposed in Our City Transport Plan 2035

Schemes in Figure 13 shown taking place in financial years 2025/26 up to 2027/28 are already being actively worked on, either being designed or built. ~~Valley Gardens Phase 3 and the A23 active travel scheme are being constructed with the A23 active travel scheme due to be completed in 2025 and the larger Valley Gardens Phase 3 scheme by the end of 2026.~~ The A23 active travel scheme was completed in 2025 with new stepped cycle tracks created along Preston Park and more space for pedestrians and cyclists on Preston Road. The third and final phase of Valley Gardens is in progress with work due to be completed in 2026.

Councillors have approved in principle the creation of red routes on Western Road and Queens Road and an outline design for the A259 active travel scheme. Detailed designs are currently being prepared for these schemes. Funding is in place for delivery of 29 fully electric buses, a minimum of 1,650 chargepoint sockets and safety improvements on Queens Road. We are also working with owners of car parks to deliver Park & Ride spaces that will serve the city centre. In summer 2025 the University of Sussex Falmer Campus was used to provide a Park & Ride on selected days. Future opportunities will also be investigated and lessons learnt used to inform the development of a business case for a purpose built Park & Ride facility. ~~Three schemes are planned from 2027/28 onwards: neighbourhood mobility hubs, a major scheme to improve the walkability of the city centre and additional active travel schemes.~~

In financial year 2026/27 we plan to begin, subject to confirmation of funding, two new schemes; Improving the look and feel of the city and exploring where neighbourhood mobility hubs could be located. Improving the look and feel of the city is described above. Neighbourhood mobility hubs will provide a focal point to seamlessly integrate different modes, such as public transport with shared and active mobility. Often, they provide a first or last mile connection to the nearest bus or railway station and provide alternatives to private car travel. The exact form mobility hubs take will be fully defined once the project gets underway.

In 2027/28 we anticipate initiating schemes on improving new active travel corridors, delivering additional bus priority measures and undertaking a study of the road network to identify how congestion can be tackled. By 2027 that work on the A259 active travel scheme will be substantively complete and the funding we receive from Active Travel England will be focused on another of the priority corridors in our LCWIP. Exactly which priority corridor we will work on next has yet to be decided but we will look to make connections with existing high-quality routes to create a connected network across the city suitable for all to use. Future bus priority measures are in the process of being identified to see which are feasible and will have the greatest impact. Future updates of the BSIP will confirm what measures are taken forward.

~~**Neighbourhood mobility hubs.** Mobility hubs provide a focal point in the Transport network that seamlessly integrate different modes, especially mass public transport, shared and active mobility. While the city has good provision of car club vehicles and a bike hire scheme, not all areas of the city are covered by them. We want to explore whether neighbourhood mobility hubs can extend provision and give greater transport choices to all areas of the city~~

~~**Improving City Centre Walkability.** The city centre, with its great cultural and retail~~

~~offerings, is a major reason why people come to visit our city. The streets make up a large part of the public realm and how people experience the city centre. We want to explore how we can improve the look and feel of the city centre. To make sure it is accessible to everyone who is walking and wheeling. We propose that it is the focus of our next major scheme.~~

~~Future Active Travel Schemes.~~ ~~Our LCWIP has already identified priority routes and areas for further active travel schemes. We are working on two priority corridors (A23 and A259) at the moment and once these are completed we will begin work on the other routes and areas so that we create a connected network across the city suitable for all to use. 100k per year has been allocated for this purpose and can be combined with the funding allocated under the title of Supporting Active and Inclusive Travel.~~

From 2029 onwards we would plan to deliver, in conjunction with other local transport bodies, a Sussex Coast Mass Rapid Transit scheme and a purpose-built Strategic Mobility Hub. ~~While our ambitions are subject to funding, Table 3 below indicates how we would distribute additional funding across our capital programme. should we benefit from a rise in central government funding from 2026/27. As funding levels are unknown, Table 3 (deleted) is indicative only. we have included an indication of whether our ambition is to keep funding the same, increase or decrease it.~~ Park & Ride would form the core of any strategic mobility hub. The aim would be to alleviate congestion in the city centre and improve the experience of visitors, residents and businesses using our road network. A mass rapid transit scheme would be a high-capacity public transportation system designed to move large numbers of people efficiently. It would aim to increase mobility across Sussex, reduce air pollution by providing an alternative to cars and support economic growth. Both these schemes would require significant capital sums, most likely from central government, to take forward. Scheme development would focus on creating a business case to demonstrate that the projects are worth investing in.

Quantifying Carbon Reduction

This section sets out what the baseline carbon emissions are from usage of the road network within Brighton & Hove City Council's administrative area. It also estimates what carbon emission reductions could be expected from the policies contained in this plan.

The scope of this exercise is limited to territorial road emissions because in our role as the local transport authority we have a reasonable degree of influence over them, unlike for example the rail network which we have no direct oversight or management of. We are doing this because central government has committed to making quantification of carbon reduction a fundamental part of local transport planning and funding decisions, as set out in the DfT's Transport Decarbonisation Plan[2]. To estimate carbon emissions, we have made use of the Carbon Assessment Playbook (CAP), developed by England's Subnational Transport Bodies specifically for this purpose. The CAP is an evidence-based tool that can be consistently applied across England.

What is the Carbon Assessment Playbook?

Parts of the CAP are publicly available on-line. The CAP includes a dashboard, estimating what emissions were produced from the road network in the council area from 2005 up to 2019.

2019 is used as a baseline year as it is unaffected by the Covid pandemic. The dashboard also shows three scenarios of what future emissions, from 2019 to 2050, are likely to be. In this plan we have chosen to show just one of the future scenarios as a future baseline for clarity and simplicity. Our chosen scenario takes account of the Zero Emission Vehicle (ZEV) mandate, which came into effect in 2024, and local factors that will affect the rate of EV uptake by consumers. The ZEV mandate is a national policy that requires car manufacturers to sell an ever-increasing percentage of zero-emission vehicles each year up until 2035, by which time 100% of new cars and vans must be zero-emission. The policy is backed by financial penalties for manufacturers not meeting the targets.

In addition to the baseline data and projection of future emissions there is a 'Policy Builder' tool. This tool has 29 different policy areas which can be built into packages of measures. The CAP allows us to input where and when we would implement different policy measures in the city and it then estimates what the cumulative impact of the chosen policy measures will be. While the CAP is an excellent first step in developing our understanding of the impact of different policy measures the Policy Builder tool is not comprehensive. To account for this there is provision within the CAP to estimate carbon reductions without identifying specific policy measures that will achieve this outcome. For example, the Policy Builder tool does not include measures that reduce HGV traffic, so the CAP provides estimates of what the carbon emissions impact of reducing HGV traffic by set percentages is. Our City Transport Plan 2035 Evidence Base sets out further detail on how we have used the CAP to estimate carbon reductions shown in this plan.

Figure 14 on the next page shows the output of our work to estimate what impact the policies contained in this plan will have on reducing carbon emissions from 2019 to 2050. The graph shows three lines. The future baseline is an estimate of future emissions excluding any policies set out in this plan. Our City Transport Plan 2035 is an estimate of what our future emissions would be if all elements of this plan are delivered. Finally, the CCC national balanced pathway shows the national pathway to Net Zero scaled down to apply to local emissions in Brighton & Hove. As with any modelling exercise of future events it is based on a set of assumptions about what is likely to happen and is an informed guess, not a prediction.

The future baseline in the graph is based on funded national policy commitments, such as the ZEV mandate (see above box) and is based on estimates of what the uptake of EVs will be in the local area. It is important to understand that the CCC national balanced pathway is only included as a rough guide of what emissions need to be reduced by. It is not a target that we must achieve. Each local authority across the country will make progress on reducing carbon emissions at different rates depending on local factors such as the rate of EV uptake, or the ability for a particular area to shift short car trips onto less carbon intensive modes. The CAP tool doesn't provide a localized transport decarbonisation pathway that takes account of

local circumstances, meaning that there is no specific emissions reduction target for Brighton & Hove.

The graph shows that while Our City Transport Plan 2035 policies will make a positive impact on reducing carbon emissions there remains some way to go to get close to the CCC balanced pathway. In 2035 the future baseline projection is that 149ktCO2e will be emitted from use of the road network. If the policies within this plan are all delivered, we estimate that emissions will be reduced to 130ktCO2e.

It may be that some other local transport authorities, where EV uptake is very rapid, are delivering greater carbon reductions than the CCC balanced pathway. However, given that the Brighton & Hove area sees an average uptake of EVs, which is the largest factor in reduced emissions, it seems reasonable to assume that more needs to be done to reduce emissions.

There is however a limit to what can be achieved through local transport policy and implementing measures that are solely focused on carbon emission reduction, which risk being unfair on those less able to afford the switch to EVs and making Brighton & Hove unattractive as a place to visit or for businesses. We need to take an approach that balances emissions reduction with the need to encourage growth and be equitable to residents. Additional action may be better achieved through national policies, rather than local. The switch to EVs will necessitate a change to how vehicles are taxed, as zero emission vehicles are exempt. Currently there is a weak link between the costs of owning and running a car and how much it is used. If the current Vehicle Excise Duty was scrapped in favour of a national system that taxed according to how much a vehicle was used this could be a powerful tool in reducing car use and tackling congestion.

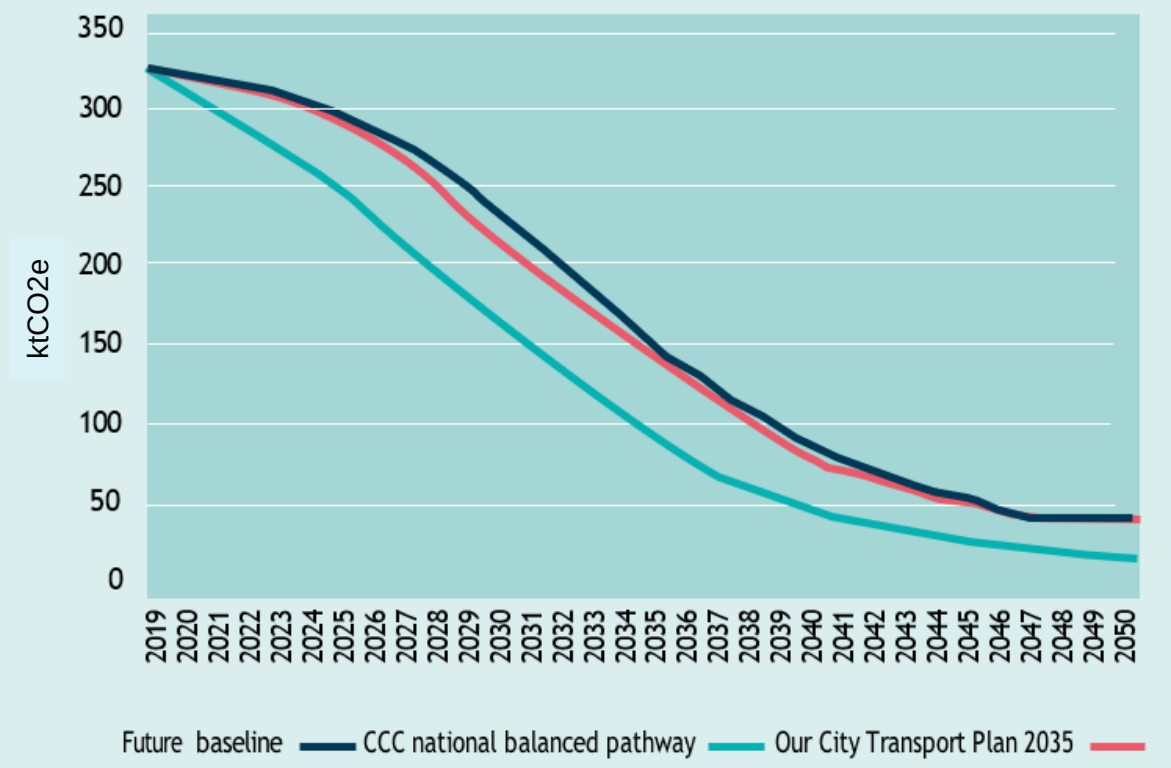


Figure 14 Projected future emissions from road transport within Brighton & Hove

Monitoring

It is important to note that it is not possible to measure or quantify everything that has been detailed in this plan. Where it is possible we have chosen the following Key Performance Indicators (KPIs), which can be monitored to provide an indication of progress. Some of the outcomes we propose monitoring are beyond our direct control but will give an indication as to how well transport is performing in the city.

Objective	KPI	Baseline 2024 (unless stated)
Increase public transport use	Journey times	1.20% increase [25]
	Punctuality	75% [26]
	Passenger satisfaction (overall)	73% [25]
	Passenger satisfaction (fares)	60% [25]
	Passenger journeys (in millions)	41.1 [27]
Enable the uptake and use of low and zero emission vehicles	Number of charging sockets delivered	500 [28]
	Households without off-street parking within a 5-minute walk of a public chargepoint	83.1% [29]
	Percentage of battery electric vehicles out of total vehicles registered in Brighton & Hove	2.1%[13]
Deliver safe, inclusive and integrated transport system	Accessibility of public transport - how easy buses are to get on/off	79% [30]
	Provision dropped kerbs - drop kerb at crossing points	53% [29]
	Number of people Killed or Seriously Injured in traffic collisions	153 [31]

[25] BSIP 2025 Refresh.
[26] Brighton & Hove City Council, 18 July 2024. 2023/24 year-end performance and target setting for 2024/25
[27] DfT, 19 March 2024. Annual bus statistics:year ending March 2023 (revised).
[28] Brighton & Hove City Council, 5 August 2024. City named number one for Electric Vehicle charging
[29] Field Dynamics, 2024. On-street households EV charhing report for 2024.
[30] NHT, 2024. 2024 NHT Public Satisfaction Survey Report - Brighton & Hove City Council.

Objective	KPI	Baseline 2024 (unless stated)
Create well-maintained streets and pavements	Proportion of principal roads in critical condition	18.32% [26]
	Proportion of non-principal roads in critical condition	14.96% [26]
	Proportion of unclassified roads in critical condition	7.89% [26]
	Public satisfaction - Condition of highways Public satisfaction - Pavements & footpaths (overall	22% [30] 39% [30]
Provide active travel choices for all and excellent public spaces	The proportion of physically active adults	80.40% [26]
Promote and use technology to reduce and manage travel.	Average delay on local main road network - seconds per vehicle per mile	111 seconds per vehicle per mile (2023) [32]
	Population with access to fibre optic - Superfast 30 Mbps and faster Coverage	99.3% (Feb 2025) [33]

Table 3: proposed Key Performance Indicators

[31] DfT, 29 May 2025. Road safety statistics

[32] DfT, 6 March 2025. Road congestion and travel time

[33] thinkbroadband, 2025. Local Broadband Information

Brighton & Hove City Council

Our City Transport Plan 2035:
Supporting Evidence Base

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1. Part 1: Brighton & Hove's transport infrastructure

1.1. This evidence base has been used to compile Our City Transport Plan 2035. It is published alongside the plan so that it is clear what information was used to formulate the plan and how issues and actions have been identified.

1.2. There are five parts to the evidence base. The first provides an overview of the city's physical transport infrastructure, an assessment of its performance and impacts, and a consideration of what changes are known about or planned. The second part is centred around understanding how people travel in Brighton & Hove and how well the transport network is meeting those needs, depending on the type of journeys being made.

1.3. The third part of this evidence base considers what the carbon emissions of the transport network are and the reductions in emissions this plan is likely to deliver. It directly responds to the commitment made in the Department for Transport's (DfTs) Decarbonising Transport policy which states that quantifying carbon emission reductions will be a fundamental part of local transport planning. The fourth part collates relevant national, regional and the council's specific policies that inform Our City Transport Plan 2035. The fifth concludes the document by summarising the main challenges the evidence base has identified.

1.4. Population & communities

1.5. To understand people's travel behaviours and needs requires a knowledge of the city and its population. Brighton & Hove is a tightly constrained, compact city situated between the South Downs National Park and the sea. In 2021, the population was 277,100. The city's population increased at a lower rate (+1.4% between 2011 and 2021) than the South East region (+7.5%) and England and Wales (+6.3%)[1].

1.6. There is lot of demand to live in the city, but providing an adequate supply of housing to meet this demand is challenging. The result is that housing affordability is an issue. In 2022, those on the lowest 25% of earnings needed 12 times their earnings to afford a property in the lowest 25% of house prices[2]. Left unchecked, this is likely to result in greater commuting into the city as people seek more affordable housing outside the city. In the decade up to 2021, there has been a net influx of 4,640 people into the city from London and other areas of the UK, while there has been a net migration of 2,335 people out of the city to East and West Sussex[3].

1.7. The city has a below average proportion of the population over 60 and under 16 (see Figure 1.). There is an above average proportion of those aged 15-52, and the two universities mean there is a very high proportion of people in their early 20's. Growth over the next 20 years is likely to be strongest in those people aged 60 and over.

[1] Census 2021; population and household estimates, England & Wales.
[2] Council Plan 2023 to 2027; earnings and tenure.
[3] Brighton & Hove Joint Strategic Needs Assessment, March 2024

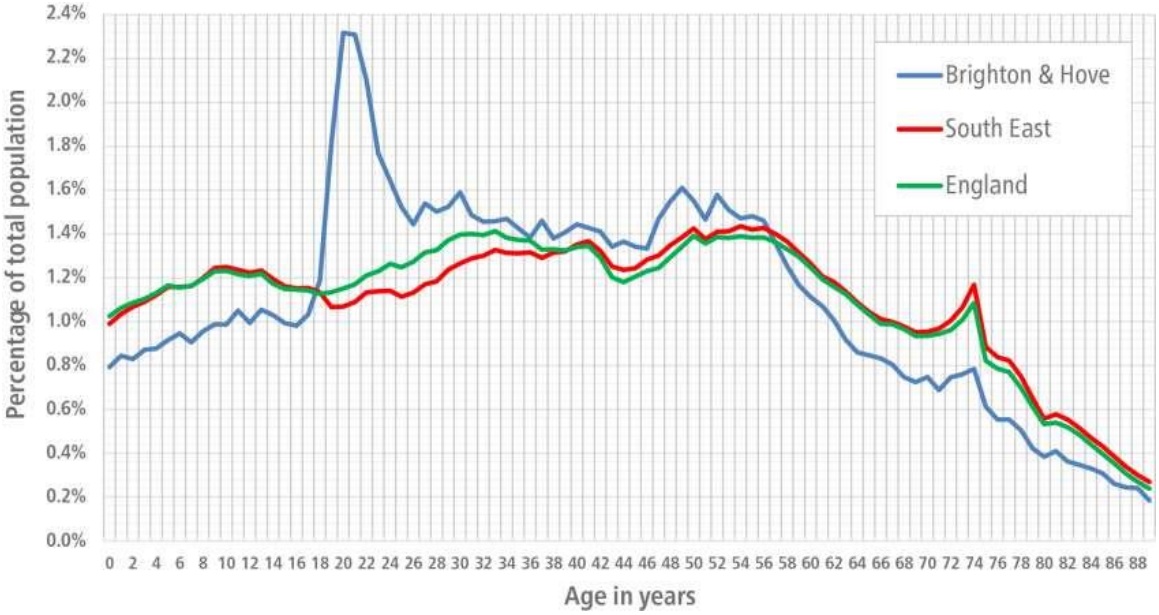


Figure 1. Brighton & Hove Population Profile, June 2021 (Source: Council Plan 2023 to 2027, Brighton & Hove demographics)

1.8. In 2021, 26.2% of residents were employed in professional occupations, which is higher than the English average of 20.3%. The largest employment sectors by broad industrial groups are health (16.3%), retail (11.3%), and education (11.3%)[4].

1.9. Employment is concentrated in the centre of Brighton, where a well-defined network of retail and office space is located. Health services providers, particularly the hospitals in Kemptown and Elm Grove, are the largest employers. The University of Sussex and the University of Brighton, with campuses located in Falmer and Moulsecoomb, also contribute significant employment opportunities. Smaller industrial estates and offices are scattered throughout Brighton & Hove.

1.10. The area administered by the council includes settlements such as Woodingdean, Ovingdean, and Rottingdean, which are separated from the main urbanised area by agricultural land. Forty percent of the council's administrative area is within the South Downs National Park, which borders the urban areas to the north and east. The National Park designation protects the existing character of the Downs for residents and visitors to enjoy. It also means that the city is largely constrained within its existing boundaries, and future development to accommodate jobs and housing growth must be within these boundaries.

1.11. Areas where new residential and commercial developments are welcomed are outlined in City Plan Part 1 and 2. Figure 2 shows the 8 development areas where most new development is anticipated. Some of this has already been delivered or is being built, such as along the Lewes Road corridor or at Hove station. New development is planned in areas with existing levels of good public transport provision to encourage the adoption of sustainable modes of transport.

[4] Census 2021; employment and level of qualifications.

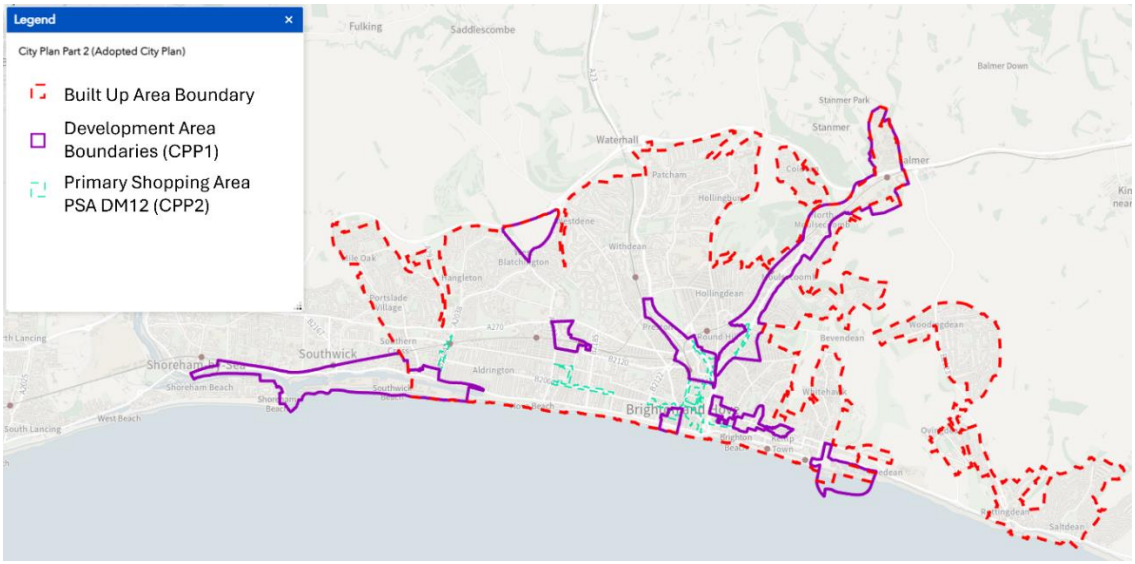


Figure 2. Planning policies showing development areas, the built-up area and National Park area (Source: [Adopted Policies Map]())

1.12. Population density, which is hugely important for the viability of public transport and ensuring that services are within walking distances of neighbourhoods, varies greatly across the city. Generally, the more historic areas of the city, apart from the city centre, which has lower residential density because of the large number of buildings used for commercial activity, have much high population density. Those areas of the city developed between 1945 and 1990, which tend to be further from the centre, have lower population densities and were often designed with the expectation that residents will rely on motor transport to access goods and services. Figure 3. Brighton & Hove population densitybelow shows the different population densities across the city.

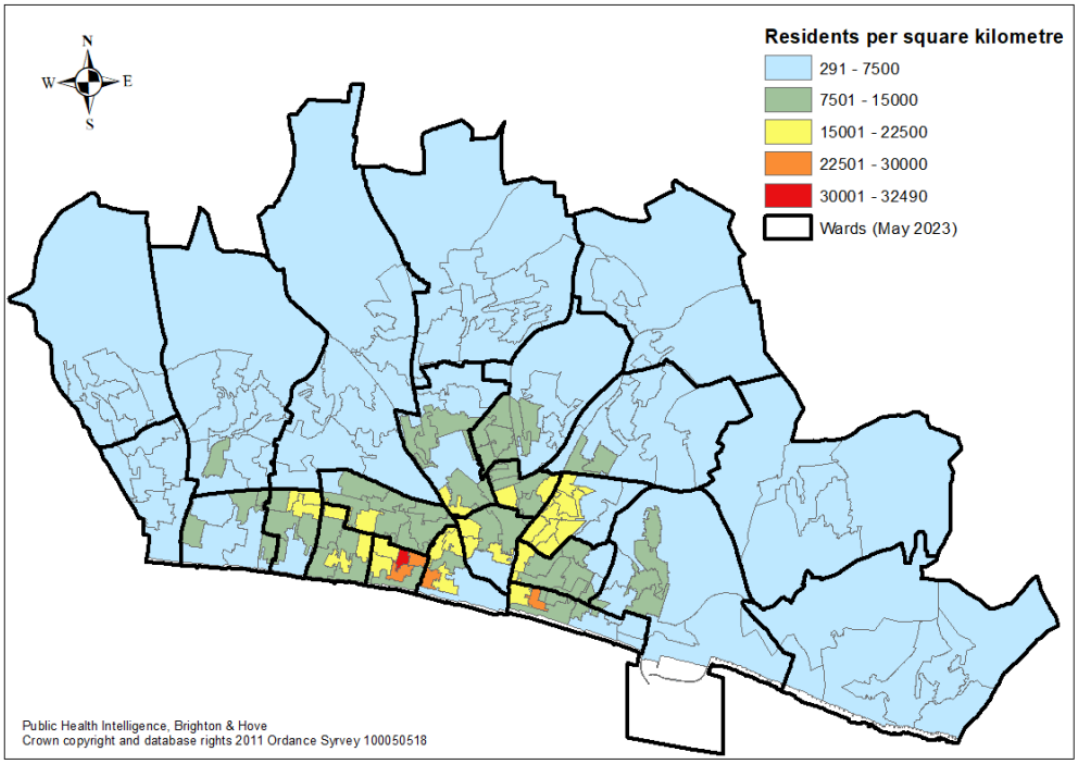


Figure 3. Brighton & Hove population density

1.13. There are concentrations of deprivation in both the centre and more outlying areas of Brighton & Hove. However, low-income households in more central areas generally have excellent access to services whereas low-income households living in more outlying areas are at risk of transport-related social exclusion[5]. This means that they will face significant disadvantages in accessing essential services such as employment, education, health and banking.

1.14. Figure 4 below shows the areas of the city at risk of transport-related social exclusion: Woodingdean, Bevendean, Coldean, Mile Oak, Hangleton, and parts of Hollingbury. Low-income households in these areas may be spending a large proportion of their income on private transport. Alternatively, households in these areas who lack access to a car, will face significantly longer journeys to access essential services.

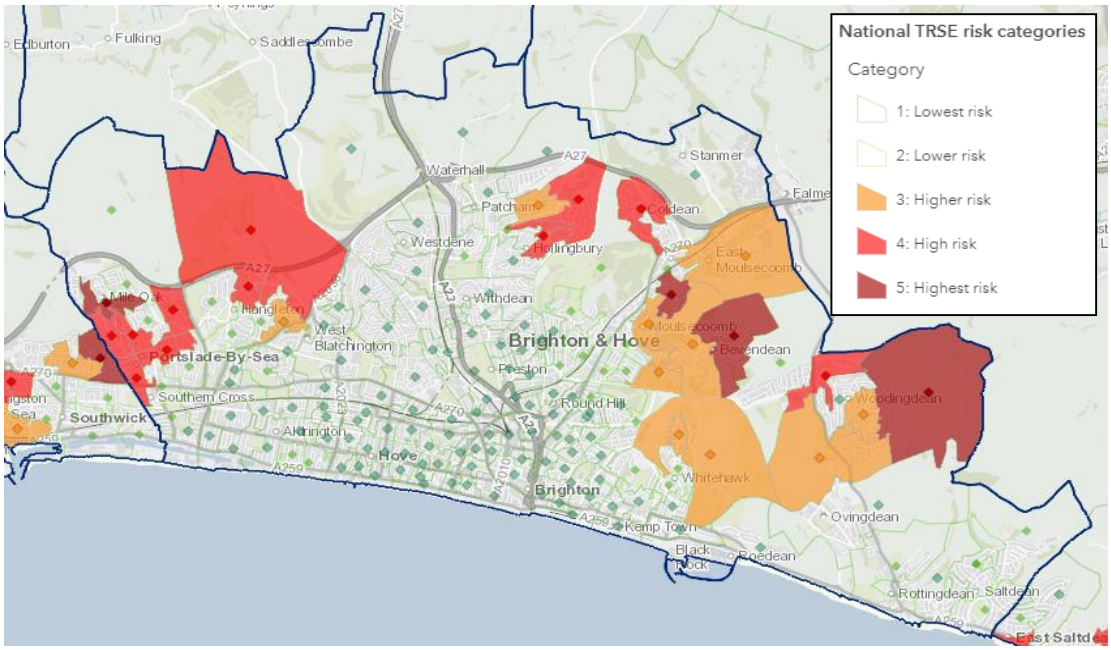


Figure 4. National transport-related social exclusion risk categories map. Source: Transport for the North.

1.15. Transport infrastructure overview

Roads & pavements

1.16. The council is responsible for managing and maintaining the vast majority of roads and pavements in the city. We are responsible for 621km of roads and 1,026km of footway (pavements alongside roads). The exceptions are roads considered to be of national importance, which are classified as part of the Strategic Road Network (SRN). The A27 and A23 north of the A27, as shown in Figure 5 below, are part of the SRN. These are managed by the central government body National Highways.

1.17. Below the SRN in the hierarchy of roads is a middle tier referred to as the Major Road Network (MRN), which is made up of busy and economically important A roads. The MRN and the rest of the road network, from B roads to the unclassified streets which make up the majority of the network, are managed by us.

[5] Transport Related Social Exclusion; Transport for the North research

1.18. The classification of roads into Motorways, A roads, B roads and local roads is what many people will be familiar with. However, within the field of transport planning, there has been an increasing recognition over the past two decades that roads, outside the SRN, do not solely exist to move traffic. In addition to their traffic movement function, streets also provide for parking, loading and other uses. Streets, particularly those adjacent to cultural institutions, cafes and parks are important public spaces, where people visit to spend time.

Figure 5. The Strategic and Major Road Networks in the local area

1.19. This approach to managing roads is set out in technical guidance published by the DfT, the Manual for Streets. It provides advice on how lightly trafficked streets and important locations such as high streets should be designed so that their 'movement' and 'place' functions are both considered. When road improvement schemes are undertaken, we consider the movement and place functions of the space when designing the new layout.

Other public paths

1.20. In addition to footways, we are responsible for a further 159km of footpaths, bridleways, and byways. These are mostly located on land north of the A27 or in the east of the city. The council has published a Rights of Way Improvement Plan 2017-2027 setting out how these paths will be managed and improved. The priority is on improving connectivity to green spaces and accessibility for diverse users. The council maintains a map of public rights of way on its website. Table 1 lists the number and length of each public rights of way type.

Public right of way type	Number	Length (km)
Footway	574	86
Bridleway	56	63
Restricted Byway	8	7
Byway	8	3

Table 1. Public Rights of Way within Brighton & Hove, type and length

Bus infrastructure overview

1.21. Buses are the most important form of public transport within the city, with annual bus journeys more than double those made by rail. We support bus services by dedicating road space for bus lanes and managing the bus stops, shelters, and real-time bus information on the city's footways. Bus lanes are concentrated on the MRN and in the city centre.

1.22. There are approximately 6.5km of bus lanes in both directions on the A270 Lewes Road, which connects the city centre to the two university sites in the north-east of the city. The A23, London Road, which runs from Patcham in the north to the city centre in the south, has approximately 1.3km of bus lane, with the majority in the southbound direction. The A259 seafront road Marine Parade, which runs east/west also has about 2km of bus lane in the settlements of Rottingdean and Saltdean.

1.23. In the city centre, there is a mixture of bus lanes and bus gates to give buses priority on the road network. This includes significant provision on Edward Street, North Street, and Western Road.

1.24. The infrastructure that we maintain supports the operation of buses provided by the privately run bus operators in the city. The Brighton & Hove Bus Company (owned by the Go-Ahead Group) is by far the most significant operator, providing about 96% of services. Compass Travel operate some subsidised routes in the city while Stagecoach and Metrobus tend to provide longer distance connections to settlements across Sussex. The Brighton & Hove Bus Company route map is reproduced in Figure 6 and Figure 7.

Figure 6. Brighton & Hove Buses Route Map

Figure 7. Brighton & Hove Buses Central Brighton map with updates from October 2024

1.25. The council subsidises bus services to areas of the city that would not otherwise have direct services. Brighton & Hove Buses operate the 21, 77, 78, and 79 subsidised services, while Compass Travel operates the 16, 37, 47, and 52 City Buzz subsidised services. The council also subsidises some school bus services.

1.26. A significant proportion of bus journeys are made by people using a concessionary bus pass; people who are of pensionable age and people with qualifying disabilities. There are over 42,000 pass holders in Brighton & Hove, of whom 7,000 are issued to disabled residents. The cost of these journeys is met by the council under the English National Concessionary Travel Scheme, at a cost of approximately £10.2 million in 2024/25.

1.27. The council published a Bus Service Improvement Plan (BSIP) in 2021, setting out how we would use £27.9 million of central government funding to improve services between 2022 and 2025. This plan has been refreshed and a further £9.3 million of funding secured from central government for the financial year 2025/26.

Cycle infrastructure overview

1.28. People on cycles can make use of the wider road network, but the risk of injury from a collision with a car, van, or lorry is a major deterrent for many people who might otherwise cycle. This is especially the case on roads with high traffic volumes. Cycle facilities, which are segregated from heavier and faster motor traffic, are needed on busier roads to make it a viable option for the majority of people.

1.29. Quantifying the amount and quality of cycle infrastructure in Brighton & Hove is not straightforward. Cycle lanes, which do not physically segregate cyclists from motor traffic, generally do not meet the most recent design standards as set out in the DfT's guidance note LTN 1/20. On lightly trafficked roads, segregated cycle facilities are not necessary if motor traffic speeds and volumes are low. Many urban roads in Brighton & Hove have a 20mph speed limit.

1.30. Figure 8 shows the current cycle network. Provision is good on the A259 seafront road, sections of the A23, the A270 Lewes Road, and some other major thoroughfares. Brighton's Local Cycling and Walking Infrastructure Plan (LCWIP) sets out the priorities for future improvements with 12 priority routes identified for future upgrades.

Figure 8. Cycle Network Map within Brighton & Hove

Rail infrastructure overview

1.31. Brighton's rail infrastructure consists of the Brighton Mainline, east and west Coastways. The Brighton Mainline connects to London and beyond. The East Coastway line connects the city to Lewes, Eastbourne, Hastings and Ashford in Kent. The West Coastway line connects the city to Chichester, Portsmouth and Southampton. Brighton station acts as a terminal point for all three lines meaning journeys east/west along the coast must interchange here. Figure 9 below shows these lines along with locations north of London that can be directly reached on Thameslink cross London services.

1.32. The council has no direct control over rail infrastructure or services in the city. The city's 8 rail stations, highlighted in Figure 10, are currently all operated by Govia Thameslink Railway, the train operating company that holds the contract to run rail services in our area. However, central government plans to nationalise all rail services by 2027.

Figure 9. Rail Network connected with the Brighton & Hove area, with though London services highlighted in purple.

1.33. A forthcoming Railways Bill will create Great British Railways, which will be responsible for both the train services and the rail infrastructure currently managed by Network Rail. Network Rail have been responsible for planning improvements to the rail network on behalf of the DfT. They organise the rail network into 14 routes, with the Sussex Route encompassing the Brighton Main Line and its associated branches. Network Rail has undertaken studies to explore what future enhancements to the rail network are feasible[6]. The DfT ultimately sets the priorities for rail infrastructure improvements, meaning the council must lobby the DfT for infrastructure improvements or any desired service changes.

[6] Sussex Area Route Study, 2015, for Brighton Mainline
West Sussex Connectivity: Modular Strategic Study, 2020, for West Coastway line
East Sussex Coast & Marshlink Strategic Study, 2025

Figure 10. Detailed rail network map in the South East, with Stations within Brighton & Hove highlighted in the red box

Port infrastructure

1.34. The western end of Shoreham Harbour is within the council's administrative area. The majority of the port lies within the neighbouring authorities of West Sussex County Council and Adur District Council.

1.35. The council is working in partnership with Adur & Worthing Council, West Sussex County Council, and Shoreham Port Authority on a joint project to regenerate Shoreham Harbour and the surrounding areas. The vision is that by 2031, Shoreham Harbour will be transformed into a vibrant, thriving waterfront destination made up of a series of sustainable, mixed-use developments alongside a consolidated and enhanced Shoreham Port, which will continue to play a vital role in the local economy.

1.36. The Shoreham Port Industrial Cluster has been successful in its application to the Local Industrial Decarbonisation Plans competition. This funding will allow businesses and partners to work together on plans to reduce emissions, learn from each other, and also have access to technical advisors to prepare for adopting measures such as using hydrogen or carbon capture.

Digital infrastructure

1.37. While not strictly transport infrastructure, internet connectivity and digital infrastructure are included here because of their importance in reducing the need to travel, as they facilitate online shopping and remote working. Our local economy also specialises in the creative, digital, and IT sectors.

1.38. Our City Plan Part 1 outlines how we support the supply and maintenance of efficient digital and telecommunication infrastructure across the city. Installation of full-fibre broadband was planned across the entire city by the company City Fibre, but rollout has been partial to date: Moulsecoomb, Bevendean, Woodingdean, east Brighton, parts of Hanover, and Elm Grove have been completed. Additional areas are expected to be completed, but timing information is unavailable.

1.40. Transport infrastructure performance

Roads & pavements

1.41. To assess the performance of our roads and pavements, we have considered their physical condition, data on journey times, and surveys of public satisfaction. The physical condition is assessed from inspections and surveys we have commissioned[7]. The DfT compiles traffic delay data[8] which compares an estimate of free-flowing traffic speed against reported travel times. Public satisfaction is gauged using the National Highways & Transport (NHT) public satisfaction survey[9].

1.42. Figure 11 below shows the location of the automatic traffic count sites that the council maintains. These are located on the MRN across the city. The annual average daily flows recorded at these sites show that traffic volumes are generally lower than 10 years ago, with only one site recording higher volumes of traffic[10]. The DfT also estimate the volume of traffic kilometres per local authority based on their own count sites[11].

1.43. The DfT records date back to 1993 and show that the number of vehicle kilometres travelled in Brighton & Hove rose steadily from 1,205 million to the highest they have ever been in 2002; a peak of 1,361 million vehicle kilometres (vkm). Traffic then declined until it reached 1,228 million vkm in 2010. The trend from 2010 to 2019 was rising, with 1,289 million vkm recorded in 2019. The pandemic saw traffic volumes drop sharply in 2020 to 1,022 vkm. By 2022 traffic volumes had risen to 1,203 million vkm and by 2024 there were 1,222 million vkm recorded. While rising, the level of traffic in 2024 was among the lowest recorded in the past 30 years. It remains to be seen if the reduction in travel, observed after the pandemic, will be a long-lasting change.

[7] Carriageway & Footway Condition Modelling Report 2023, XAIS Asset Management
[8] Local A Roads Speed and Delay & data tables
[9] NHT 2024 public satisfaction survey
[10] Brighton & Hove City Council Traffic count sites
[11] DfT Road Traffic estimates by local authority & data tables

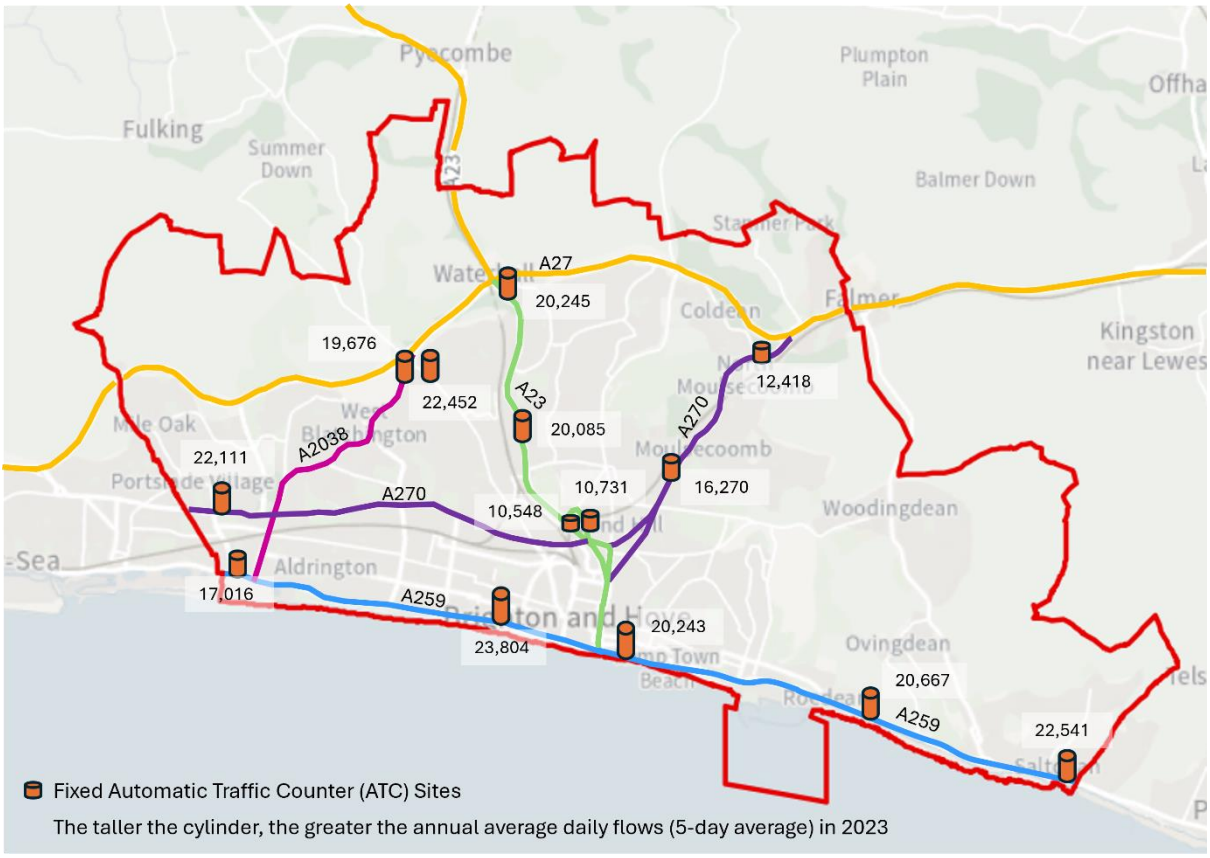


Figure 11. Annual average daily traffic flows within Brighton and Hove based on the Fixed Automatic Traffic Counters

1.44. Like other local authorities the dedicated budget we receive from central government for roads and footway maintenance has been insufficient in recent years, and the condition of these assets has been worsening. The 2023/24 budget for planned maintenance of our roads was £2.9 million, with an additional £400,000 allocated for footway maintenance. Condition surveys show that there is a maintenance backlog of £57 million on our roads and £37.3 million on our footways[7]. While the 2025/26 budget saw a significant increase in grant funding for maintenance, to £5.3m, additional funds are required to tackle the backlog of work.

1.45. To use our limited maintenance budget effectively, the council currently delivers a 'seek and fix' footway maintenance programme. Our highway inspectors identify footways where there are clusters of defects and areas nearing defect status and prioritise these areas for resurfacing. In addition to planned repair work, circa £680,000 is spent on reactive carriageway maintenance (pothole repairs) and £450,000 on reactive footway maintenance each year to repair defects that pose a hazard to users.

1.46. We currently lack data on how much of our footway network meets minimum width standards, but we are aware of many examples where this is not achieved, particularly in older parts of the city. DfT guidance on Inclusive Mobility states that a footway width of 2m is the minimum that should be provided. If this is not feasible due to physical constraints, then a minimum of 1.5m could be regarded as the minimum acceptable under most circumstances. Where there is an obstacle, such as a lamp column or tree, the absolute minimum width should be 1m, with the maximum length of this restricted area being 6m.

1.47. DfT travel data[8], reproduced in Figure 12 and Figure 13 below, show that the average delay on Brighton & Hove's local A roads is among the highest of any local authority outside of London, with roads in other urban areas on the south coast performing better. In 2023, the average delay in Brighton & Hove was 111 seconds per vehicle per mile (spvpm). This compares with the inner London average of 160 spvpm, Southampton's 102 spvpm, Portsmouth's 76 spvpm, and Bournemouth, Christchurch & Poole's 64 spvpm[12]. DfT data for travel time on local A roads is only available from 2020 onwards so trends pre-pandemic are not available.

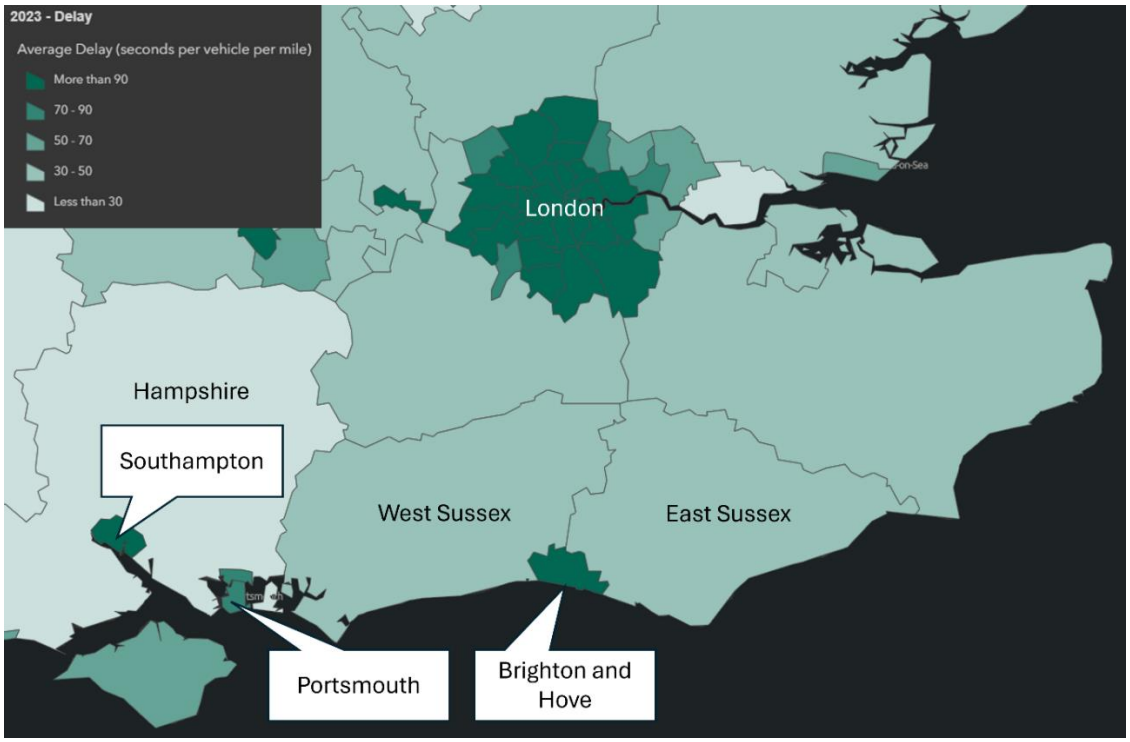


Figure 12. Average delay on Brighton & Hove's local A roads. Source: DfT

1.48. As could be expected, delays in rural areas are lower than in urban areas. East Sussex and West Sussex both experience much lower average delays of between 30–40 spvpm on their local A roads. The DfT data also allows us to compare the performance of individual roads. Figure 13 shows average delays on both the SRN, which is managed by National Highways, and the 7 local A roads that the DfT monitor, which Brighton & Hove is responsible for.

1.49. In the vicinity of Brighton & Hove, the SRN comprises the A27 and A23, both of which are multi-lane dual carriageways that generally perform well with low average delays. However, as a city with a high number of visitors, there can be delays on these roads at particularly busy times. The only routine issue on the SRN is with minor delays on the eastern section of the A27, from the junction with the A270 at Falmer. This delay is likely to be caused by a bottleneck at the junction.

1.50. Figure 13 illustrates how delays increase significantly as traffic transfers from the higher capacity SRN to the local A road network, which is generally single lane and therefore has lower capacity. Delays tend to be worse closer to the city centre. The most severe delays exceeding 200 spvpm occur on:

[12] Average Speed and delay on local A roads 2023 (Table CGN05). DfT.

- A2023 between the seafront and Old Shoreham Road
- A2010 between the seafront and Seven Dials
- A23, London Road, between St Peter's Church and Preston Circus.
- A270, Upper Lewes Road and viaduct Road, between Preston Circus and Vogue Gyratory

1.51. In the built-up area, there is no available land for increasing road capacity without demolishing existing buildings. Instead, our approach is to increase the efficiency with which our existing road space is used, with buses and cycles being the most efficient modes of transport for moving people short distances in an urban area[13].

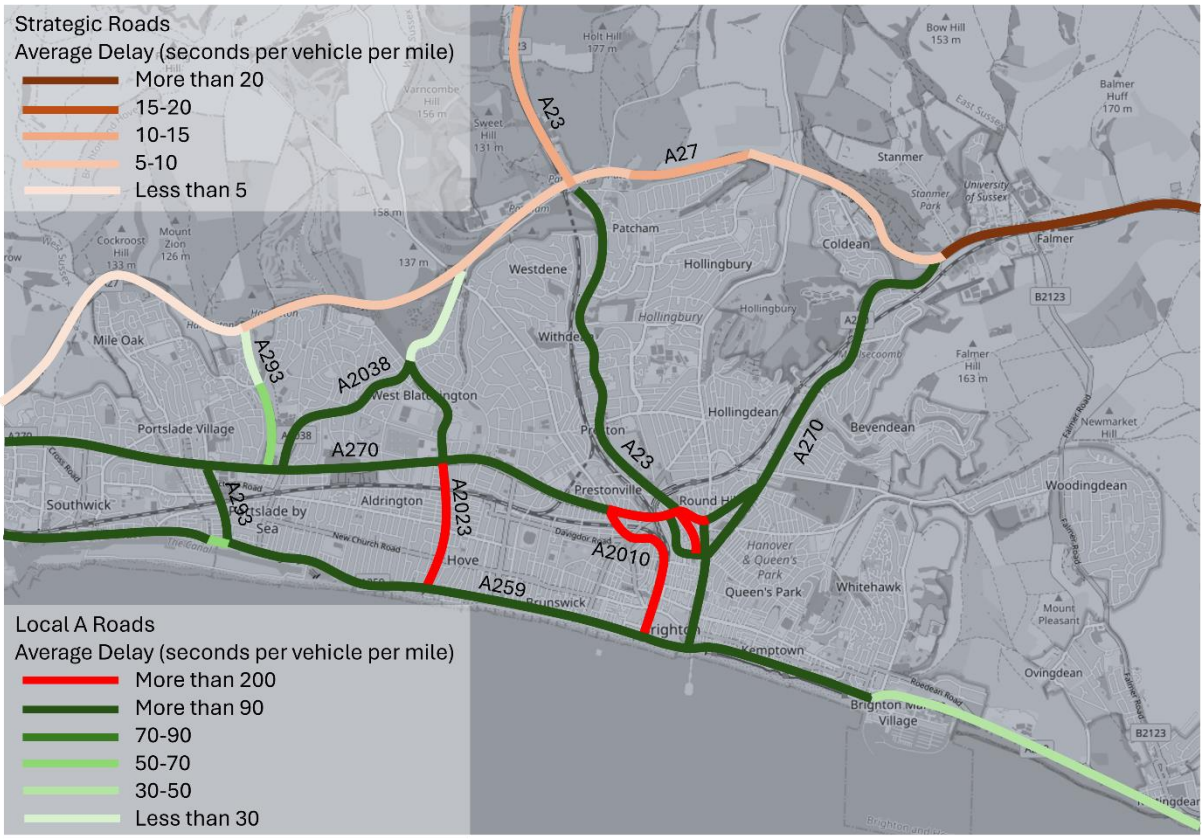


Figure 13. Detailed map with an average delay of SRN and Local A Roads within Brighton & Hove across 24 hours by Link

1.52. The council participates in the NHT public satisfaction survey[9], which provides feedback on the public's perception of how local authorities are managing their transport assets. In 2023 111 local authorities took part, and these results are used to create a national average score against which we can benchmark our performance. This report includes tables showing the council's score along with a colour indicating how well we performed against relative to other local authorities.

Colour indicating the council's performance is in the top quartile, 1% - 25%
Colour indicating the council's performance is in the second quartile, 26% - 50%
Colour indicating the council's performance is in the third quartile, 51% - 75%
Colour indicating the council's performance is in the bottom quartile, 76% - 100%

[13] Getting Cities Moving, National Infrastructure Commission, 2022

1.53. Table 2 shows selected indicators related to roads and pavements that are managed by the council. Satisfaction with the condition of pavements and roads is low nationally. In the past 5 years, the council has generally been perceived as performing above the national average, but in the most recent 2023 survey, the results fell below average. There is a perception that there is a particularly acute issue with weeds on pavements and delays in repairs where needed.

Indicator	National Average	the council	Gap
Condition of highways	27%	24%	-3%
Number of potholes	14%	11%	-3%
Weed killing on pavements	39%	28%	-11%
Action to repair local roads	27%	19%	-8%

Table 2. Public Satisfaction of Selected Indicators Related to Roads and Pavements

1.54. In 2019, the council moved to a maintenance schedule that relied on manual weeding, but in May 2024 introduced a controlled-droplet application of glyphosate, which is more targeted and sustainable than previous methods of glyphosate application. It is expected that this will improve outcomes by keeping the pavements weed-free and mitigating environmental risks.

Other public paths performance

1.55. The council manages a 159km countryside network comprising footpaths, bridleways, restricted byways and byways open to all traffic shown in Figure 14. The network includes 155 gates, 312 waymarks and 26 stiles.

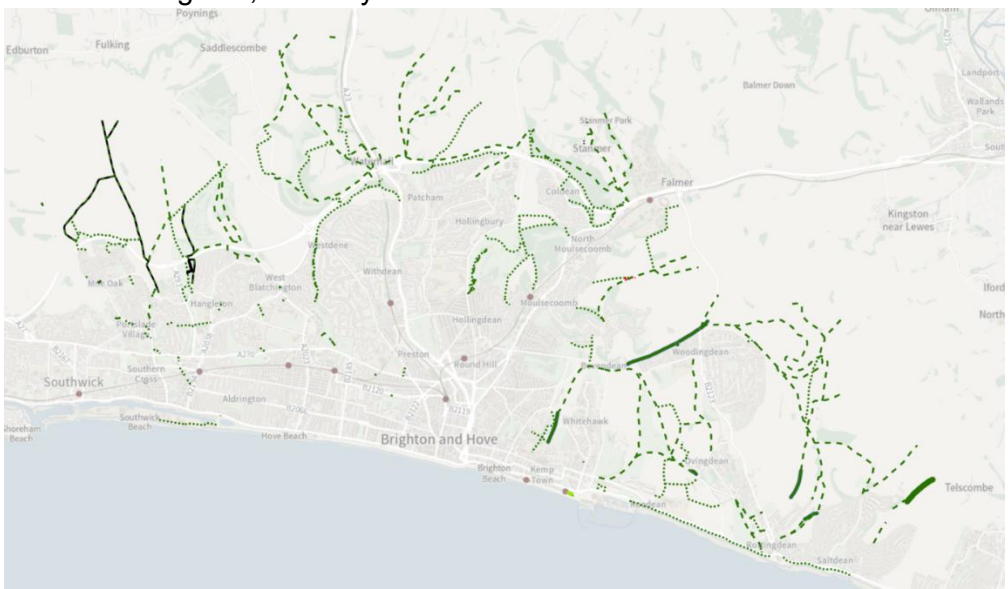


Figure 14. Public Rights of Way Network

1.56. In early 2026 the results of an updated Public Rights of Way Asset Survey will be available. At the time of compiling this evidence base 47% of footpaths, 78% of bridleways and 100% of byways open to all traffic had been surveyed. Among these, 81% of footpaths, 69% of bridleway and 63% of byways open to all traffic are reported to be in good condition. Moreover, 15% of gates require repairs while 14% need to be replaced. Furthermore, 32% of waymarks are either missing or in need of repair and 17% of stiles require repairs.

1.57. The performance of the paths that make up the public rights of way network is best gauged through the NHT public satisfaction survey. Overall, the performance of the public rights of way network presented in Table 3 is perceived as being above the national average, with the main issue being overgrown footpaths.

Indicator	National Average	The council	Gap
Condition of rights of way	52%	57%	5%
Ease of use by those with disabilities	42%	46%	4%
Information on rights of way	46%	50%	4%
Overgrown footpaths and bridleways	37%	36%	-1%
Rights of way overall	54%	55%	1%

Table 3. Public Satisfaction of Selected Indicators Related to Public Rights of Way

1.58. With an annual maintenance budget of approximately £24,000, a prioritisation method is in place to ensure effective planning. Maintenance focuses on paths and assets that fail to meet statutory requirements or pose significant risks of injury or damage, which are therefore given higher priority.

Bus infrastructure performance

1.59. Bus use in Brighton & Hove is high compared to other UK cities[14]. The number of bus journeys per head of population is the second highest in the UK, with only London having more. Figure 15 shows the annual number of journeys made by bus in Brighton and Hove over the past decade.

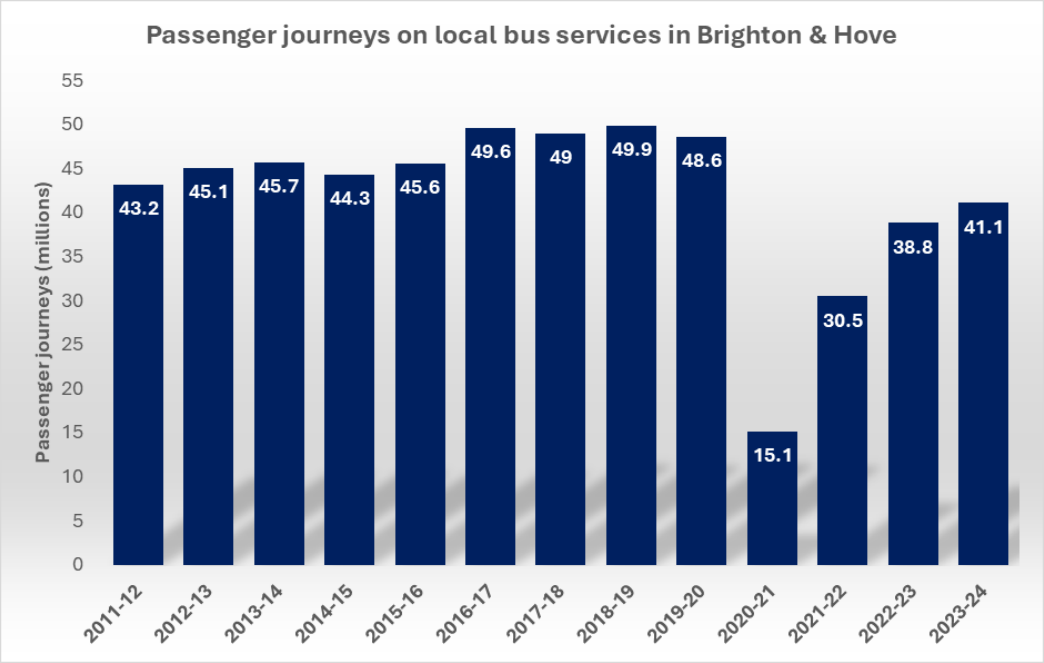


Figure 15. Number of Bus Journeys on Brighton & Hove Bus Services

1.60. While usage is recovering from the lows seen during the Covid pandemic, in the year ending March 2024, there were just over 41 million trips by bus. This is significantly

[14] Local bus passenger journeys (table BUS01), DfT statistics.

lower than in 2019, pre-pandemic, when the number of annual journeys was close to 50 million.

1.61. To aid the recovery of bus travel, the council has published a BSIP, which was refreshed in 2025[15]. Funds are used for a mix of fare subsidies and bus infrastructure designed to improve bus journey times. For bus travel to be attractive, it needs to be affordable and provide competitive journey times compared to car travel. The council provided approximately £1.14 million in 2024/25 in funding for supported bus services, including services to the South Downs National Park, communities not served by the commercial bus network and school buses.

1.62. The DfT publishes data on what percentage of non-frequent services run on time and the average excess waiting time for frequent services. However, data on frequent services' excess wait time is largely incomplete, with no data available for the council's area. The punctuality of non-frequent services in the city is broadly in line, although slightly below, the English and Southeast regional average[16].

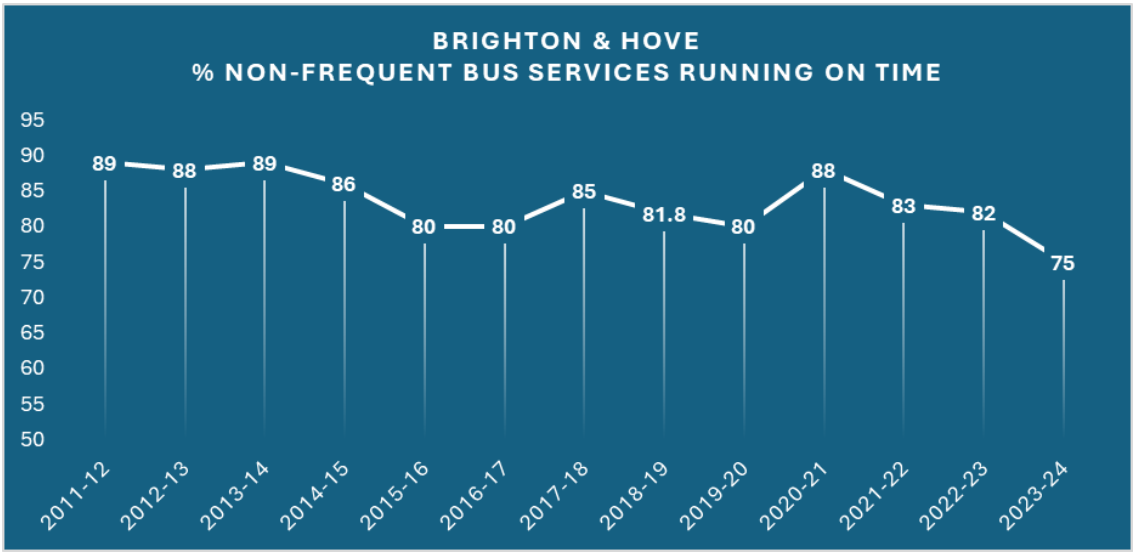


Figure 16. Percentage of Non-frequent Bus Services Running on Time in Brighton & Hove

1.63. Punctuality figures for Brighton & Hove Buses, representing most bus services in the city, reduced from 85.5% between April 2014 and March 2015 to 80.4% for 2019-2020. In 2020-2021, which includes the Covid-19 lockdowns, the figure improved to 87.6%. However, the punctuality decreased again in 2023/24. We have also engaged with Brighton & Hove Buses to understand long term trends in scheduled journey times of bus routes. The trend has been for increased journey times on the majority of routes. Between 2008-16 there was an average increase of 12% on journey times. Between 2016-2025 there was a further 11% average increase in route journey times.

1.64. There are likely to be varied causes for the rise in bus journey times. As seen in Figure 15 bus ridership was rising until the pandemic and passenger volumes will affect journey times, particularly on high-frequency urban services, where boarding and alighting rates are high. Other possible causes include roadworks, road space

[15] Concessionary Fares and BSIP update, Brighton & Hove City Council cabinet report, 2025
[16] Local bus passenger journeys (table BUS09) DfT statistics

reallocation, signal phase changes, and more stringent driver safety margins built into schedules to maintain reliability. However, traffic congestion is often an important factor in bus journey times.

1.65. Through our enhanced bus partnership we will work with bus operators to identify bus priority measures to reduce bus journey times. BSIP projects include schemes at Dyke Road/Upper North Street, A259 Marine Parade, and A23 North (Patcham). The BSIP target is to increase the punctuality of bus services to 95% and a 10% reduction in journey times by 2030, using 2018/19 as a baseline.

1.66. The public perception of the local bus services is very good. In the NHT public satisfaction survey, all but one of the 28 questions about buses scored a response in the top quartile. The only area where satisfaction fell below the national average was the issue of bus fares. Selected questions are shown in Table 4.

Indicator	National Average	The council	Gap
Frequency of bus service	51%	72%	21%
Number of bus stops	64%	79%	15%
Whether buses arrive on time	48%	60%	12%
Bus fares	54%	52%	-2%
Local bus service overall	54%	71%	17%

Table 4. Public Satisfaction of Selected Indicators Related to Bus Service

1.67. The council has undertaken an analysis of how well served neighbourhoods across the city are by bus services as part of the BSIP 2025 Refresh[17]. This study has identified areas with lower bus accessibility and priority areas for action. Prioritisation was based on how accessible areas are, the number of deprived households and/or full-time student population, and the potential for modal shift based on accessibility and car availability.

1.68. Mile Oak, Coldean & Falmer, Woodingdean, Bevendean, and Saltdean were identified as lower accessibility areas, meaning residents in these areas are reliant on public transport and will travel for longer to access employment or key services such as schools, GPs, and so on. Figure 17 sets out areas with the lowest accessibility by time period[18].

[17] 2025 BSIP Refresh
[18] Source: Jacob's BSIP Accessibility Study for Brighton & Hove City Council. 2024

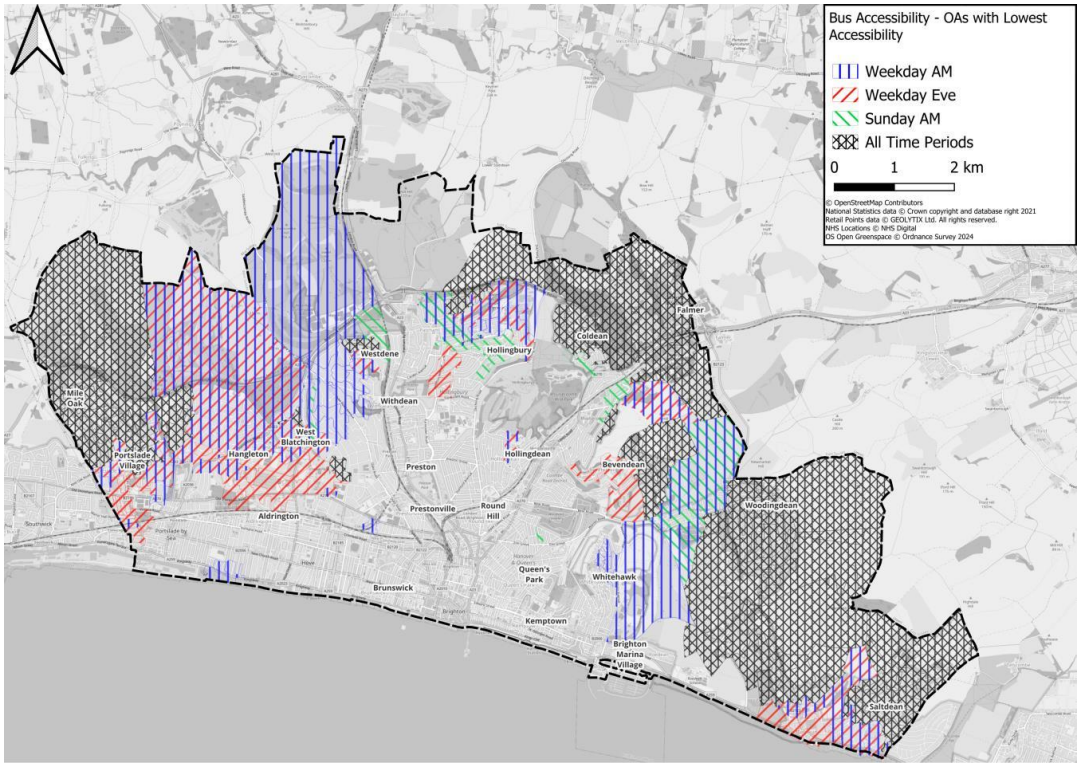


Figure 17. Lower Accessibility areas across all three tested time periods in 2024

1.69. Mile Oak, Coldean & Falmer, East Bevendean, and East Woodingdean were identified as the highest priority for local need (see Figure 18), while Mile Oak, Portslade, West Blatchington, Woodindean, Ovingdean, and Saltdean were determined as high potential for modal shift (see Figure 19).

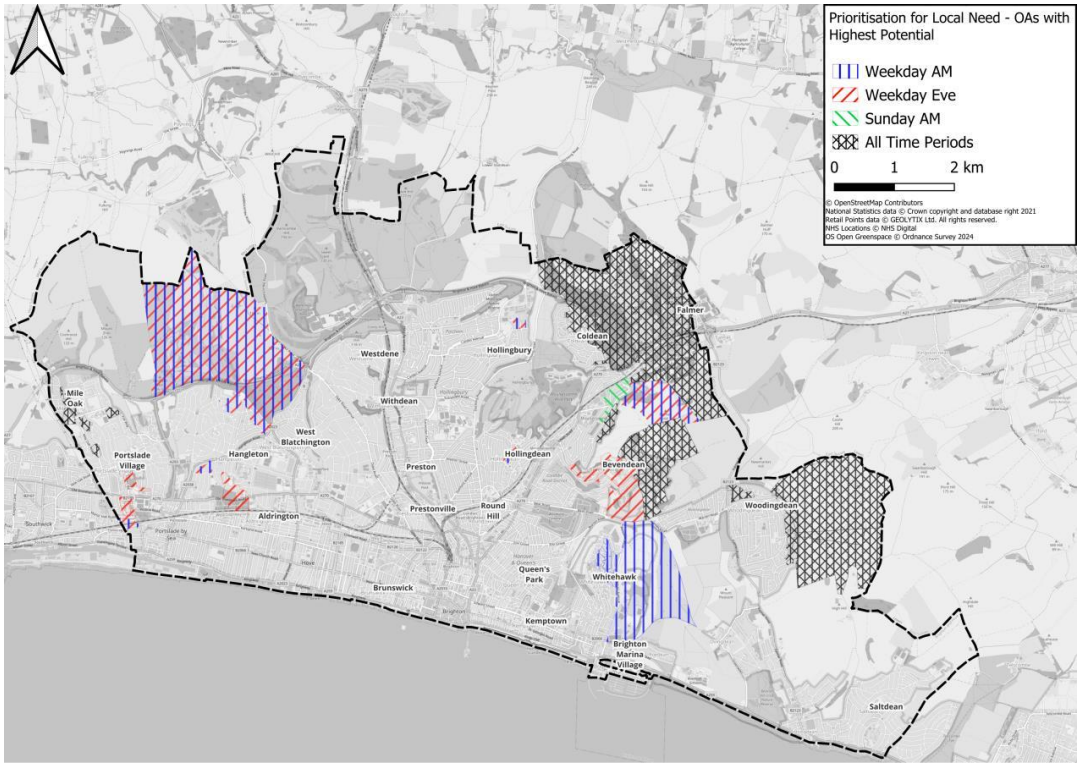


Figure 18. Highest Priority for Local Need across all three tested time periods in 2024[18]

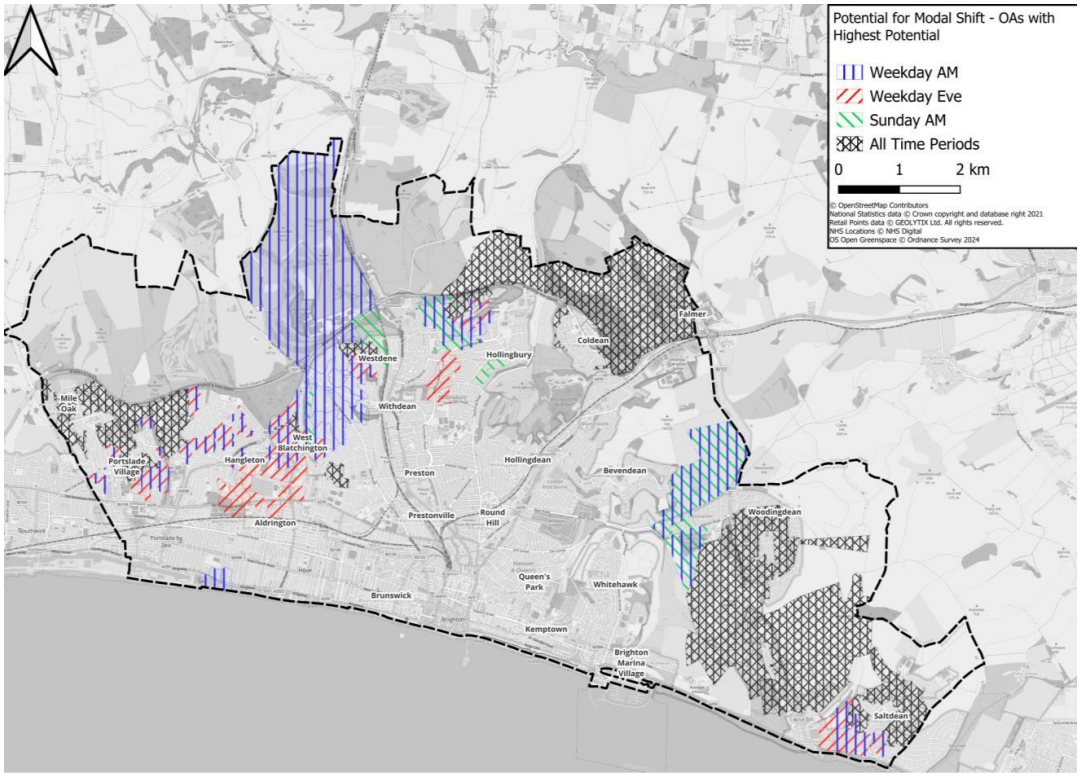


Figure 19. High Potential for Modal Shift across all three tested time periods in 2024[18]

1.70. Some high-level improvements were suggested in the report to provide the greatest social benefit. Regarding local need, bus priority measures on Church Road or Western Road could benefit Mile Oak residents using the 1X route, as well as benefit parallel routes. A service connecting the area to Hangleton or Old Shoreham Road during the evening and Sunday morning periods could also be beneficial. Bus priority measures on Lewes Road between Coldean and Moulsecoomb would likely reduce bus journey times, which could benefit Coldean & Falmer residents.

1.71. To offer the highest potential for modal shift to bus, localised information campaigns, particularly delivered alongside any service improvements or fare offers, were proposed for all areas of focus. More localised proposals include providing an express route to central Brighton to benefit Downs Park/ Hangleton residents and bus priority measures on the A259 to benefit Saltdean residents and other services.

Cycle infrastructure performance

1.72. The number of people choosing to cycle is probably the best indicator of how well our cycling infrastructure is performing. Trends on the number of people choosing to cycle is difficult to judge with the information available to us. Since 2020, we have been carrying out dedicated cycle counts at 15 locations across the city. However, 2020 is not a good year to use as a baseline because across the UK, there was an increase in cycling trips, stages, and miles travelled during 2020 associated with the pandemic. By 2023, the average number of trips and stages have returned to similar levels seen in 2019[19].

1.73. Taken as a whole, the 15 count sites reflect this UK wide trend, with cycling having declined slightly from 2020 to 2023 in Brighton & Hove. The exception to this is the two

[19] DfT statistical release, walking & cycling Aug 2024

count sites located on the Old Shoreham Road, where there is a segregated cycle facility, which both recorded an increase in cycle trips over the period.

1.74. The 2021 census data, which asks how people travel to work, is also affected by the pandemic, with a far greater increase in home working and a decline in other modes. It cannot be usefully compared to 2011 to see what trends there are across the city. The census data does show us which areas of the city have higher rates of cycling for trips to work, with the Round Hill area of Brighton and much of Hove seeing cycling to work at rates of 7-10%. The LCWIP document sets out in greater detail an analysis of cycling across the city.

1.75. Since 2016 the DfT have annually surveyed people as to their walking and cycling habits[20]. This reveals how frequently people walk and cycle for either travel or leisure purposes. The rates of cycling in Brighton & Hove are much higher than the UK average. This is true for both regular (3 or more times a week) and infrequent (once a month) cyclists. For example in 2016, 16.3% of Brighton & Hove residents cycled once a week for travel purposes compared with 6.3% for England.

1.76. The trend since 2016 has been downward in both Brighton & Hove and England. In 2023 only 11.4% of Brighton & Hove residents cycled once a week for travel compared with 5.4% in England. The fact that Brighton & Hove's results mirror those at the national level suggest that the decline in cycling is not primarily due to local factors.

Rail infrastructure performance

1.77. The long-term trend over the past 25 years has been increasing usage of the rail network, although growth has been slower in the past decade. Figure 20, showing entries and exits for the 8 stations in the Brighton & Hove area, is consistent with nationwide trends brought about by the pandemic. Patronage of the rail network is still significantly lower than pre-pandemic levels.

1.78. In Brighton & Hove, immediately prior to the pandemic, there were 24 million entries and exits through the city's 8 train stations. This sank to less than 6 million at the height of the travel restrictions imposed during the pandemic, and in 2022/23, this had recovered to just over 19 million, which is 21% fewer trips than in 2019/20.

[20] DfT National Travel Survey and Active Lives Survey

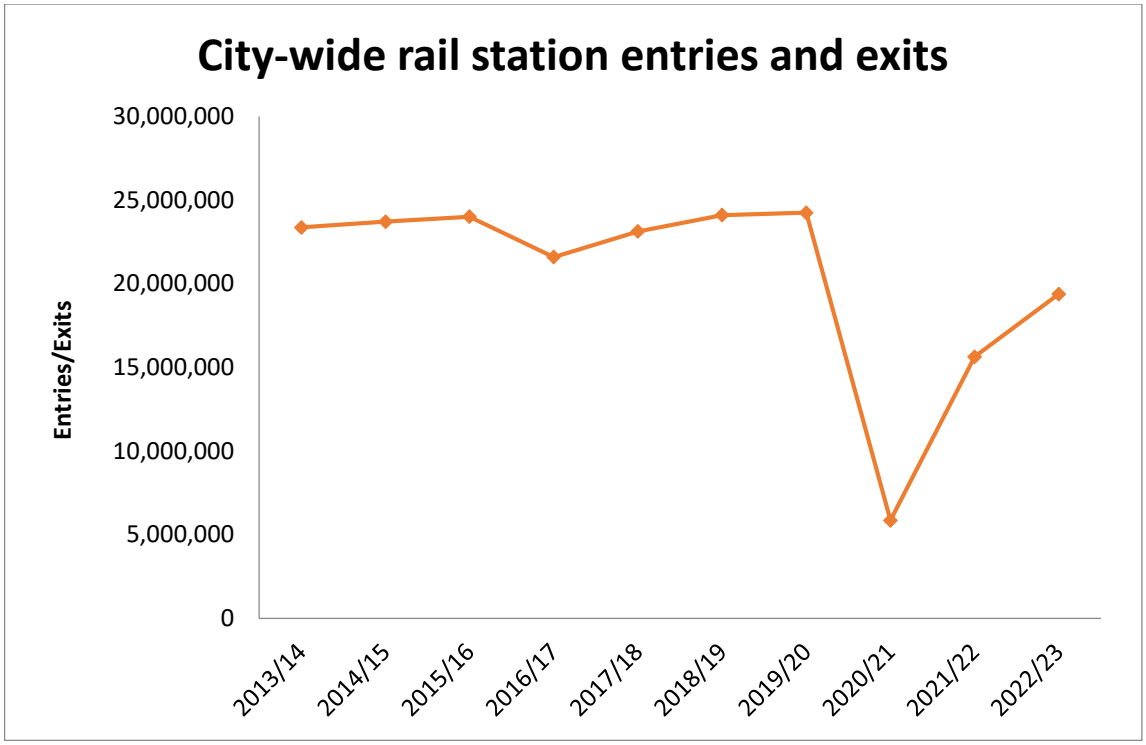


Figure 20. Graph showing combined entry and exit figures for the 8 Brighton & Hove stations. Note that figures for 2016/17 were affected by industrial action.

1.79. Approximately 27,000 rail passengers arrived at Brighton station on a typical weekday in 2023[21]. Immediately prior to Covid, this figure would have been around 33,000. In the morning peak, between 7am and 10am, just under 6,000 people arrived, whereas before the pandemic, it would have been around 8,000.

1.80. Govia Thameslink has reported a strong bounce back in leisure travel post-pandemic, with weekend travel now higher than pre-Covid. Journeys to Brighton are now busier on Saturdays than on weekdays[22]. However, commuter travel has returned in smaller numbers as businesses find more efficient ways of working with less travel, for example, working from home and hybrid working.

1.81. Rail services have responded to the new travel patterns with fewer services arriving and departing the city. In 2019, there were 360 train services arriving and departing the city, but by 2023, this had reduced to around 270 services. The decline in the rail capacity serving the city is much less pronounced. In terms of seated capacity, there were an average of 118,000 arriving in the city in the three years prior to the pandemic, compared with 102,000 in 2023.

1.82. Before the pandemic, passenger crowding and comfort in the morning and afternoon peaks were major issues, but this is no longer the case with lower passenger numbers. The percentage of passenger crowding in Brighton was recorded at zero from 2020 to 2023, indicating that the number of passengers remained lower than the capacity.

[21] Rail passenger numbers and crowding on weekdays (RAI02)
[22] DfT Statistical release, Sep 2024

1.83. National Rail publishes data on train punctuality by station, although this is most conveniently viewed on the 'On time trains' website[23]. In general, Brighton & Hove stations are in line with the UK average performance for cancelled and delayed trains with the exception of Preston Park, which in 2023 suffered from a high number of cancellations and late trains (see Figure 21). Stations on the West Coastway, Falmer, Moulsecoomb and London Road generally had better performance than elsewhere.

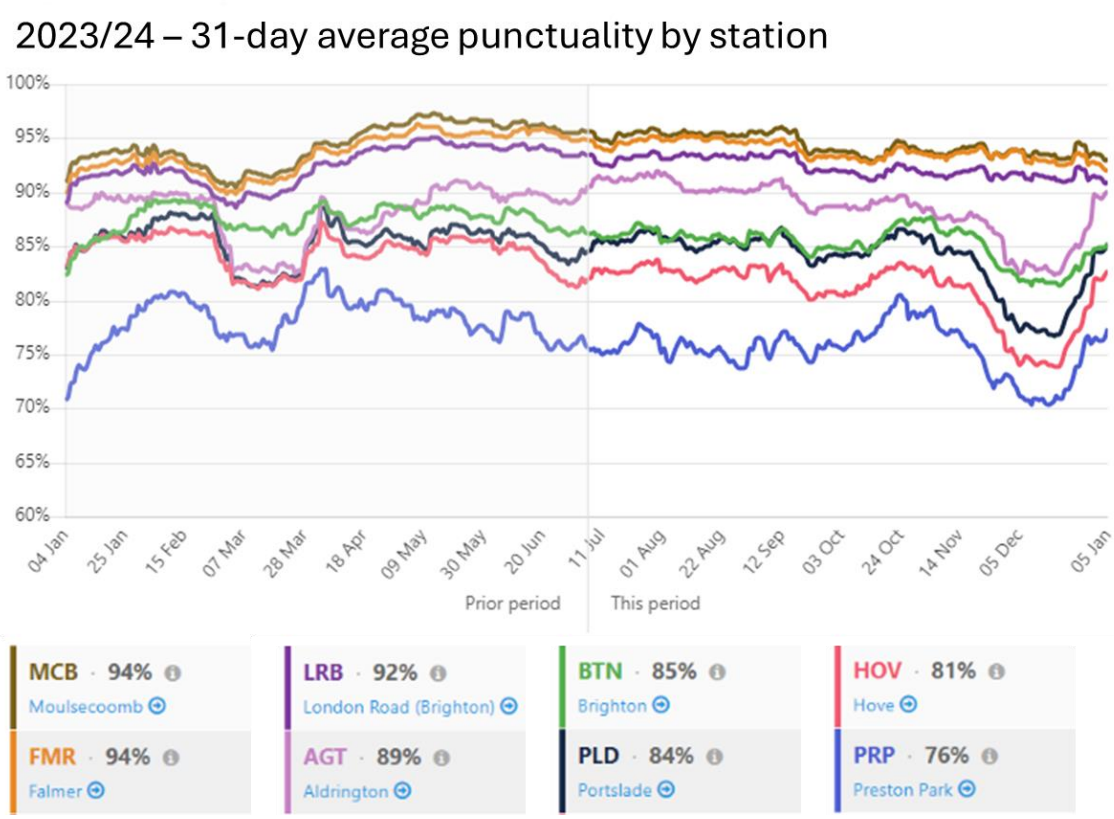


Figure 21. 31-day average punctuality performance. Reproduced with permission from OnTimeTrains.

1.84. Transport infrastructure impacts

1.79. The transport network brings clear benefits, increasing accessibility, connecting people and facilitating trade. However, it also has negative impacts, the most significant of which are:

- greenhouse gas (GHG) emissions
- air pollution
- noise pollution
- casualties

1.80. Section 3 of this document covers GHG emissions from the transport network.

Air Pollution

1.81. Poor air quality is the largest environmental risk to public health in the UK[24]. Legal limits are in place, which set the maximum allowed concentrations for several air

[23] On Time Trains
[24] Public Health England, Estimating local mortality burdens associated with particulate air pollution

pollutants. Most measured pollutants in the UK are under the legal limit. However, the two pollutants of most concern, and which have breached legal limits in many urban areas, are particulate matter (PM) and Nitrogen Dioxide (NO_2).

1.82. PM refers to any pollutant in the air which is not a gas. PM is classified according to size, with PM10 referring to particulates less than 10 micrometres in diameter and PM2.5 those less than 2.5 micrometres in diameter. For reference, a human hair is about 60 micrometres wide. PM10 is small enough to enter the lungs. Road traffic is a major source of both PM and NO_2 pollutants.

1.83. Long-term exposure to lower concentrations of pollutants and short-term exposure to higher levels of pollution are both damaging to people's health. For this reason, legal limits for air quality standards are set for both scenarios. Concentrations of PM and NO_2 are measured in micrograms per cubic meter, µg/m3.

1.84. Table *5* shows the current legal limits.

	Current legal limits		
Pollutant	**PM10**	**PM2.5**	**NO_2**
Annual average	40 µg/m3	20 µg/m3	40 µg/m3
24-hour average	*50 µg/m3	-	-
1-hour average	-	-	**200 µg/m3

Table 5. Legal limits for PM and NO_2. * Note the 24-hour limit cannot be exceeded more than 35 times a year. **The hourly average cannot be exceeded more than 18 times per year.

1.85. In response to exceedances of the legal limit for NO_2, the council declared two Air Quality Management Areas (AQMA) in 2013. We are required to undertake enhanced monitoring, publish annual Air Quality Status Reports, and an Air Quality Action Plan setting out what measures we will implement to reduce emissions within legal limits.

1.86. Annual monitoring reports have been published since 2015 with the latest one being the 2024 Report. Over the past decade air quality has steadily improved and the original two AQMAs have been replaced with six smaller ones, shown in Figure 22 below. Road transport is responsible for 80% of NO_2 concentrations at roadside, with diesel vehicles the largest source in local areas of greatest concern[25]. As could be expected all of our AQMA are focused on roads and junctions that carry high volumes of traffic.

[25] DEFRA / DfT, UK plan for tackling roadside nitrogen oxide concentrations, 2017

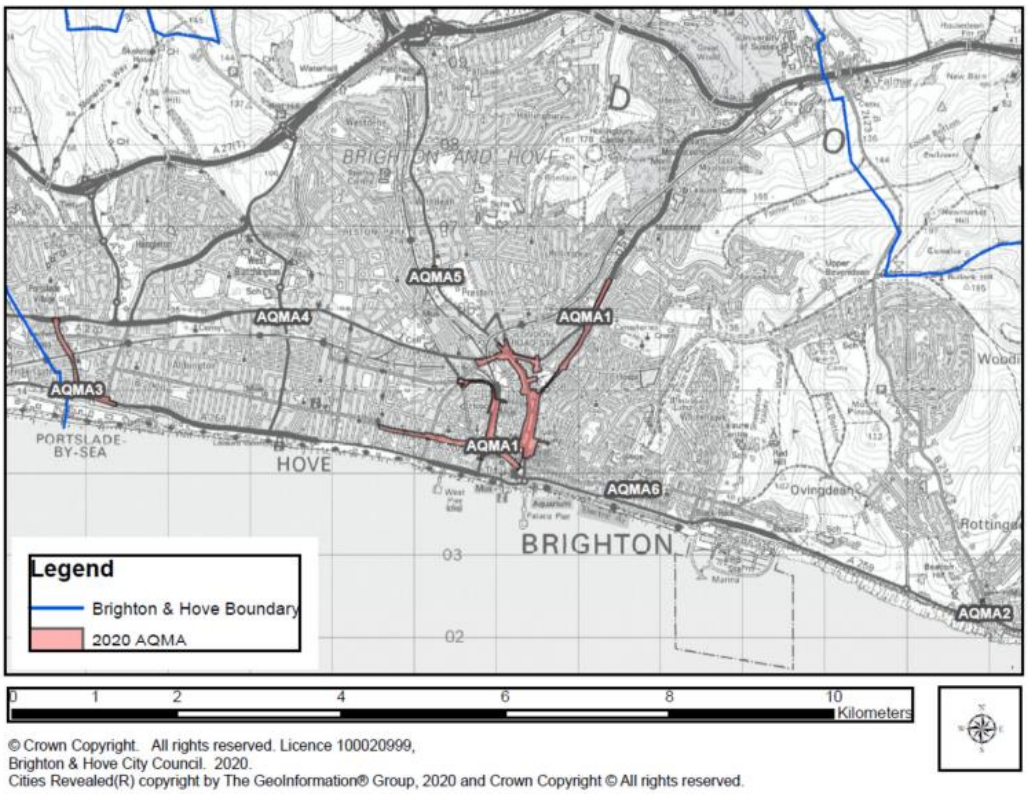


Figure 22. Air Quality Management Areas (AQMA) in 2020

1.87. The council has implemented various actions, including the Brighton & Hove Bus Ultra-low Emission Zone (ULEZ). While the bus ULEZ covers a relatively small area on Western Road and North Street, it captures well over 90% of buses operating in the city. A detailed breakdown of the sources of NO_2 in each AQMA and future actions to reduce NO_2 will be set out in the most recent status reports or AQMA action plan[26].

Noise pollution

1.88. Noise can have a significant impact on our health, with the volume, timing and duration of a sound relevant to its effects on human health. In 2018, the World Health Organisation (WHO) published environmental noise guidelines for the European region, which were based on systematic reviews of the scientific literature. This defined the harmful long-term noise exposure level above which a significant increase in negative health effects occurs as 55 dB (averaged over a 24-hour cycle) or 50 dB (averaged overnight)[27].

1.89. The UK's Environmental Noise Regulations 2006 require that exposure to environmental noise from major sources of road, rail and aircraft in urban areas is determined by noise mapping. Every 5 years, DEFRA publish noise mapping data which illustrates noise impacts associated with the road and rail network[28]. The most recent round 4 noise maps, based on data from 2021, are available to view online[29].

[26] Brighton & Hove City Council air quality webpages
[27] House of Lords, Science and Technology Committee: The neglected pollutants: the effects of artificial light and noise on human health.
[28] DEFRA noise mapping data.
[29] DEFRA, round 4, road noise online map.

Figure 23 shows the Lden noise indicator, which is an amalgamated day-evening-night level of noise based on annual averages.

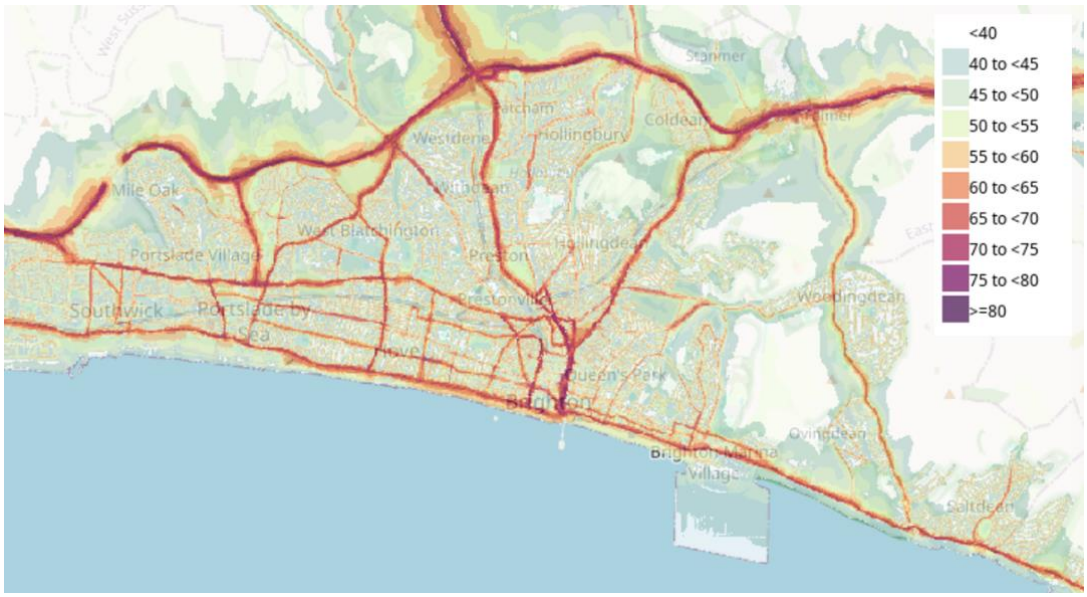


Figure 23. Noise levels in 2021. Source: Road Noise Lden

1.90. Using this data, DEFRA identifies 1% of the population affected by the highest noise levels from roads or railways and designates them Noise Important Areas. In Brighton & Hove, Noise Important Areas have been identified along the A23, from The Level to the seafront sections of Lewes Road, Queens Road, and the A259 seafront road.

1.91. The external noise that a passenger car can emit is a regulated pollutant. The exact noise level allowed is related to the vehicle's type approval. Details are available on the Vehicle Certification Agency website. The current limits, set in 2016, are 72 dB(A) for most cars. In 2026, the limit for most new passenger cars will be reduced to 68 dB(A).

Road casualties

1.92. The council has a record of taking action to reduce casualties on our roads. Safety was the rationale for making many of the city's roads 20mph. An assessment of Brighton & Hove's 20mph limit in 2018[30] concluded that there had been a statistically significant change in collisions and casualties, relative to the 30mph comparator area. The results show a significant reduction in overall collisions (-18%) and overall casualties (-19%).

1.93. However, the number of people killed or seriously injured (KSI) on Brighton and Hove's roads has risen slightly over the past 8 years. In Great Britian over the same period the trend has been for a slight decrease in KSIs. Changes in severity reporting mean that serious injury figures from 2016 onwards are not directly comparable with earlier years.

1.94. In the three-year period 2021 – 2023 there were an annual average of 172 KSIs recorded in Brighton & Hove compared with 161 KSIs over the period 2016-2018. In

[30] 20mph research study - 2018 - Report by Atkins, AECOM, and Professor Mike Maher (UCL)

Great Britain in the three-year period 2021 - 2023, there was an annual average of 28,835 KSIs compared with 31,493 for the period 2016 – 2018. This is illustrated in Figure 24.

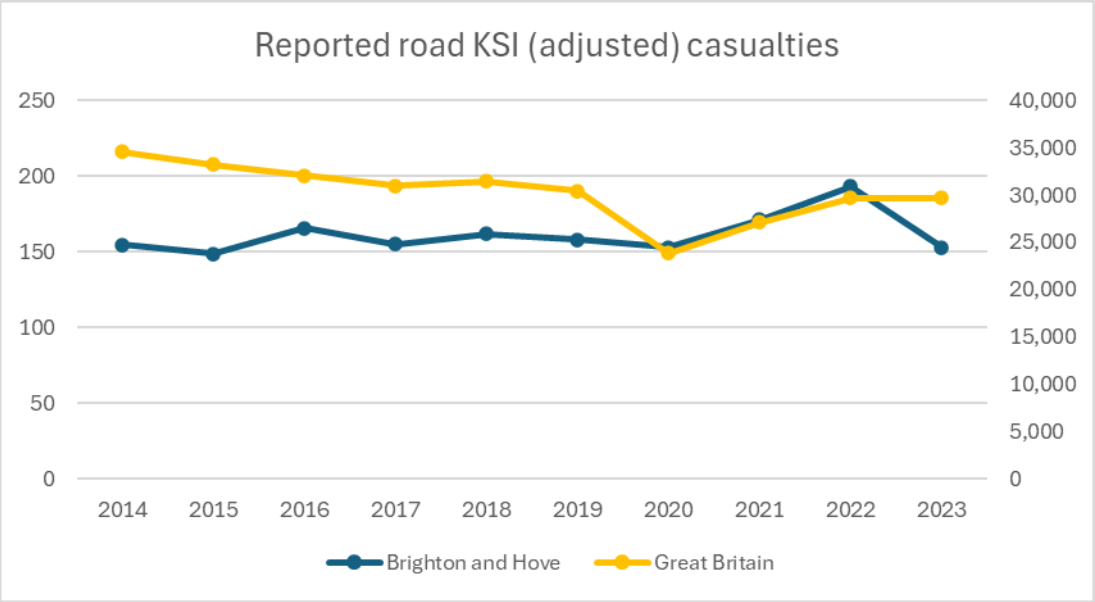


Figure 24. Reported road KSI casualties (source: Road safety statistics)

1.95. The location of traffic collisions over the past five years is shown in Figure 25. These incidents predominantly occurred along the main traffic corridors across the city. However, there is a noticeable concentration of collisions in the centre of the city, likely due to the high footfall and traffic volumes in this area.

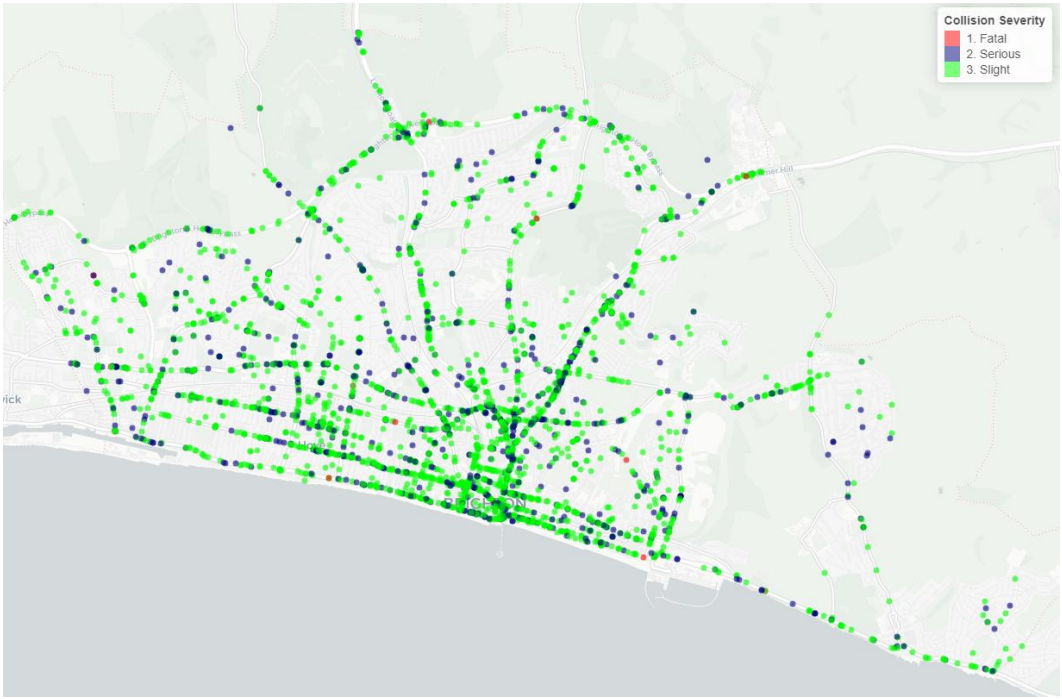


Figure 25. Collision Map in Brighton & Hove between 01/01/2019 and 31/10/2024 [31]

[31] Sussex Safer Roads Partnership Data Portal

1.96. When police officers attend the scene of a collision, they are able to select up to 6 contributory factors, from a list of 78, that they believe contributed to the collision. These contributory factors reflect the reporting officer's opinion at the time of reporting and are not necessarily the result of an extensive investigation. While

1.97. The most frequently recorded contributory factors when a collision has resulted in a casualty fall into the categories of 'Driver or rider error or reaction' or 'Behaviour or inexperience'. This includes the specific factors of 'Driver or Rider failed to look properly' and 'Driver or Rider careless, reckless, or in a hurry'. Next on the list of most frequently recorded contributing factors are 'Injudicious action' and 'Impairment or distraction'. All of the above were recorded in 47%-18% of collisions resulting in a casualty in Brighton & Hove in 2023.

1.98. This suggests that to make the biggest reductions in road casualties, our focus should be on driver behaviour and designing our roads, particularly junctions and crossings, so that driver errors are less likely to result in a casualty. We will develop and publish a Road Safety Action Plan after further analysis of the available data to set out what actions we believe will result in delivering reductions in casualties.

1.99. A general trend in national casualty statistics is that vulnerable road users – pedestrians, cyclists, and motorcyclists – make up a large proportion of casualties. With Brighton and Hove having higher levels of walking and cycling than the national average[33], we want to ensure that our focus is on making these forms of travel safe. We have analysed pedestrian and cycle casualties to understand what the trend is within Brighton & Hove.

1.100. The number of pedal cycle KSI casualties has decreased over the past 4 years. From 2015 to 2021, there were between 40-50 casualties a year. In 2022 and 2023, there were under 35 KSIs. The number of annual pedestrian casualties has remained relatively consistent over the past ten years, with an average of around 45 KSI casualties[34].

[32] DfT road safety statistics. Data table RAS07
[33] DfT walking and Cycling statistics, 2024.
[34] Sussex Safer Roads Partnership Data Portal

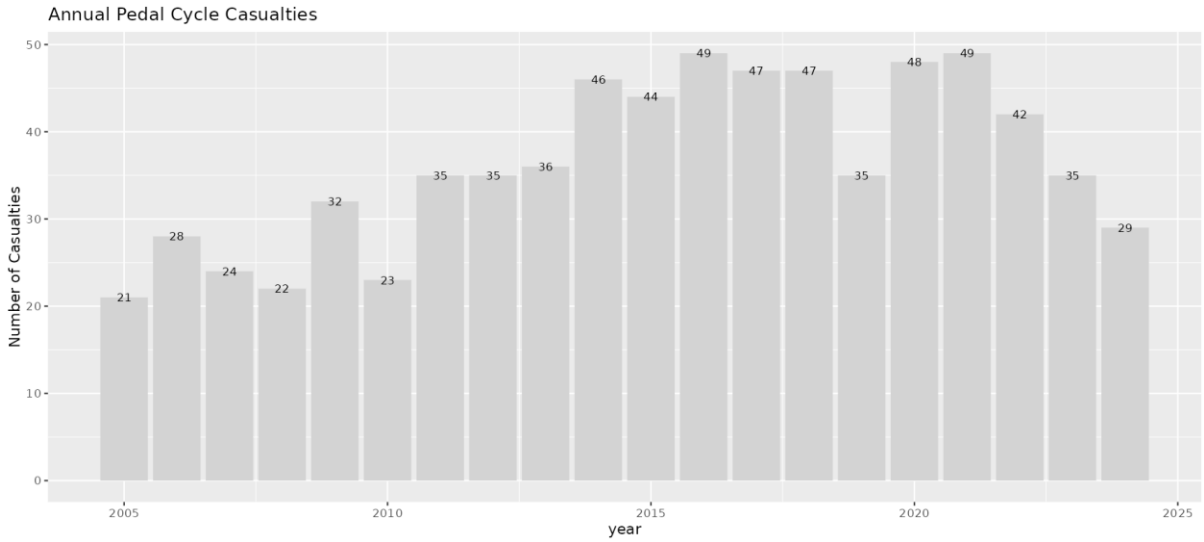


Figure 26. Annual Pedal Cycle KSI up to 2024

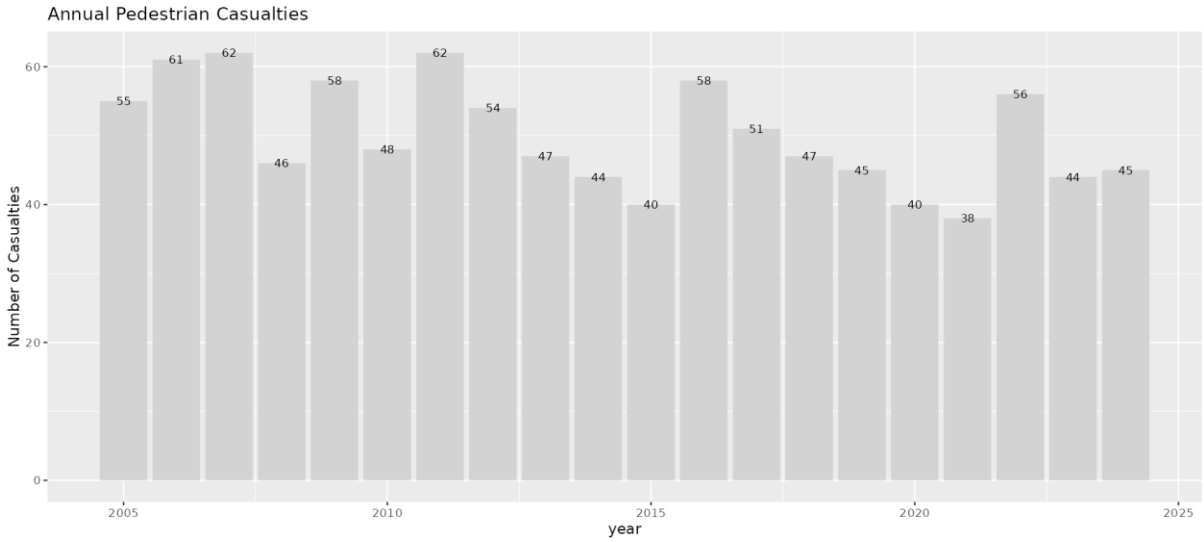


Figure 27. Annual Pedestrian KSI up to October 2024

1.101. A more detailed analysis of road traffic accidents focusing on collisions involving cyclists and pedestrians in Brighton and Hove in the last 5 years (01/01/2019 – 15/10/2024) has been requested from Sussex Safer Roads Partnership for a deeper understanding of any contributory factors of the collisions.

1.102. While fatalities involving cyclists remain relatively low, the severity of injuries tends to be higher than the overall average. Cyclists are more likely to be involved in accidents during peak commuting times both morning and afternoon. Pedestrians in Brighton and Hove are notably more likely to sustain fatal or serious injuries in accidents. The main contributory factors of these collisions are ‘driver/rider error or reaction’. The police also record ‘Pedestrian failure to look’ or ‘in a hurry’ frequently. There may also be under-reporting of slight injuries for these groups.

1.103. To understand the relative risk different motor vehicles pose to cyclists and pedestrians, we analysed the number of collisions resulting in a fatality or serious injury to these vulnerable road users alongside the kilometres travelled by the different vehicle types. Figure 28 and Figure 29 illustrate these findings.

1.104. HGVs are more than twice as likely to be involved in a collision resulting in fatality or serious injury to both cyclists and pedestrians, relative to their kilometres travelled. LGVs also pose a greater threat than cars. The risk of motor vehicles being involved in a serious injury or fatality per vehicle-km is higher for people walking than for those cycling. We do not have accurate figures on how many pedestrian and cycle kilometres are made each year, which would be needed to fully assess the relative risk faced by these modes of travel.

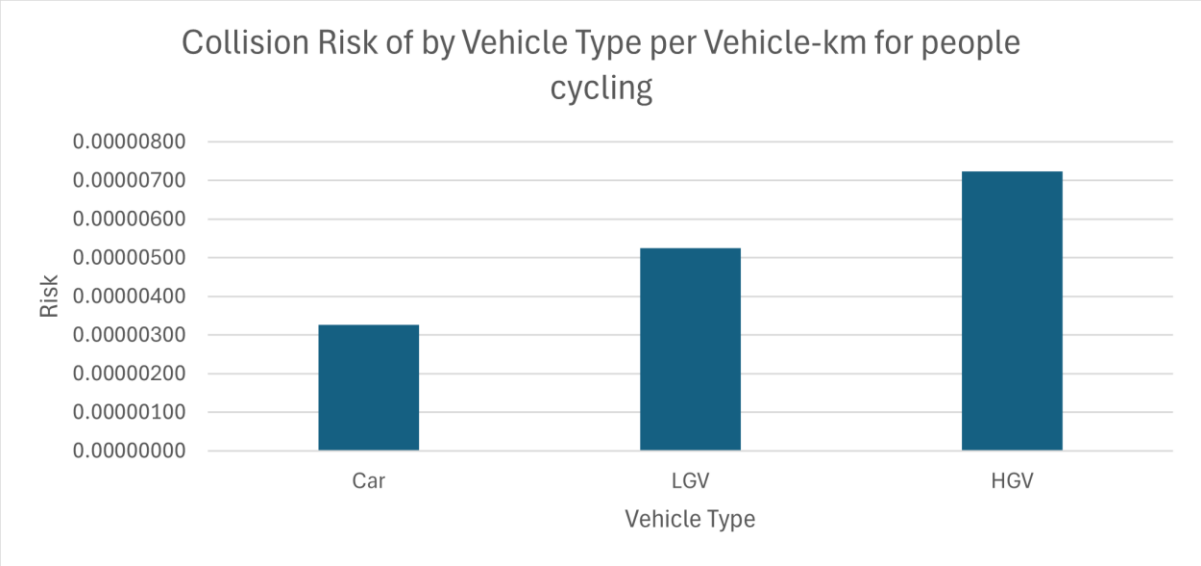


Figure 28. Risk of motor vehicles being involved in fatal or serious injury collisions per vehicle-km for people cycling

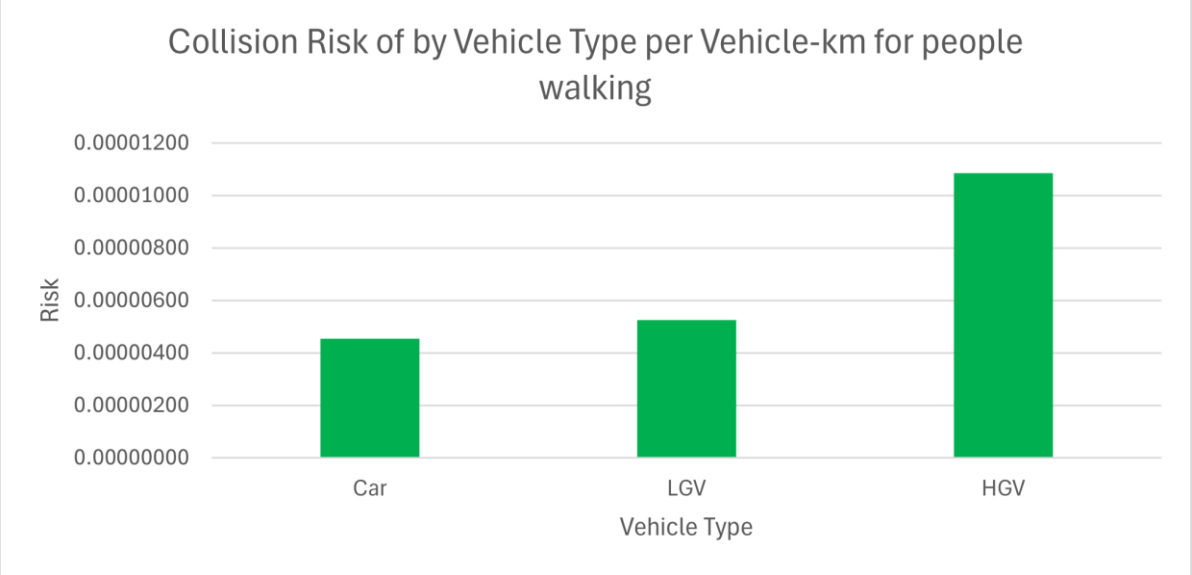


Figure 29. Risk of motor vehicles being involved in fatal or serious injury collisions per vehicle-km for people walking

1.105. Further analysis is required to fully understand how we can reduce collisions and casualties. The draft Our City Transport Plan 2035 makes a commitment to produce a Road Safety Action Plan to focus on how we can reduce casualties.

2. Part 2: Understanding travel in Brighton & Hove

2.1. The previous part of the evidence base focused on the city's transport infrastructure. This part seeks to understand people's reasons for making journeys and the travel choices they make. Brighton & Hove specific data is much scarcer on this topic than on our transport infrastructure. This part is divided into three sections that consider:

- leisure and shopping travel
- commuter travel
- servicing & deliveries

2.2. In the UK, for at least the past 20 years, shopping has generated more trips than any other reason for travelling. The chart below shows the average number of trips according to purpose, based on the 2022 National Travel Survey (NTS)[35]. This is completed by approximately 16,000 individuals in 7,000 English households every year. In 2022, shopping accounted for a quarter of all trips. A further 12% of trips are visiting friends, and a significant number of the 15% of 'other' trips are also likely to include leisure trips. Shopping and leisure are, therefore, the most common reasons for a trip to be made.

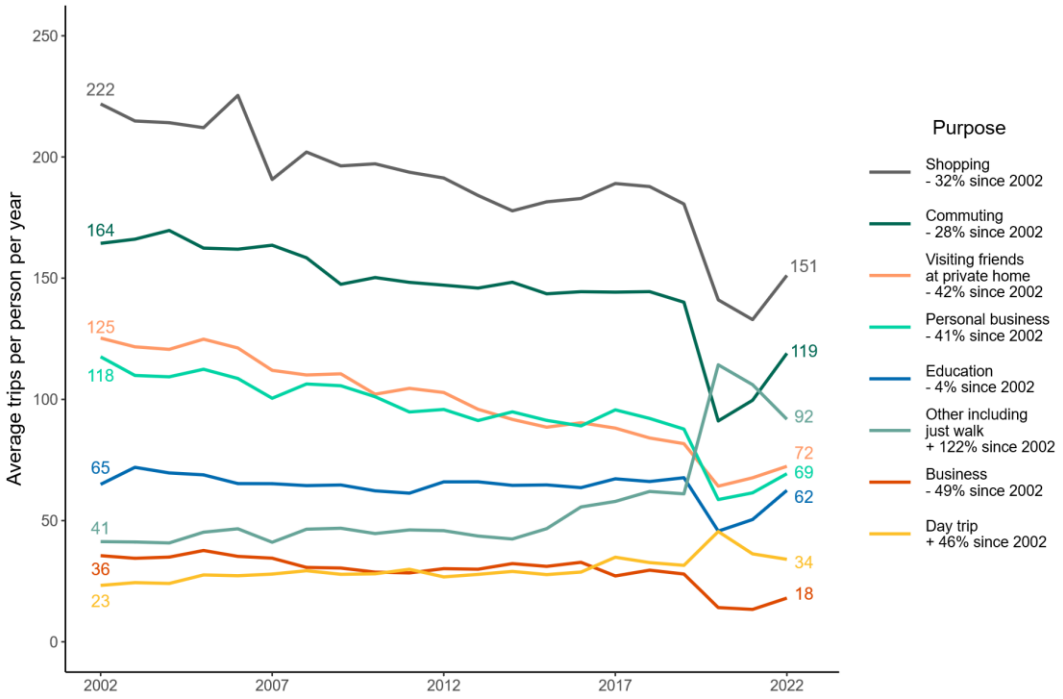


Figure 30. National data on trips per person per year by purpose

2.3. Commuting is the second most common trip purpose, responsible for a fifth of all trips. A further 10% of trips are made to visit educational establishments. Both commuting and education-related trips are likely to occur during the morning and evening peak travel periods.

2.4. Although day trips make up only 6% of all trips nationally, the tourism sector remains vital to Brighton & Hove's economy. Easy access to Brighton & Hove is an important

[35] 2022 National Travel Survey

issue for the economic health of the city. Similarly, while business trips represent just 3% of trips in the NTS, deliveries and servicing are critical to the local economy. Efficient goods delivery supports a thriving business sector.

2.5. To supplement the NTS, we have also commissioned Qa Research to conduct a large-scale household travel survey with a representative sample of residents living across all wards in Brighton & Hove. In total 2,017 surveys were carried out. The primary purpose of this survey was to validate a strategic transport model for the city, but it also affords us useful insights.

2.6. Leisure and shopping

2.7. Despite it being the most common trip purpose, there is far less data available on shopping and leisure trips than on travel to work, which has a dedicated question within the national census. The data we have on traffic volumes and congestion is not matched to survey data on trip purpose so it is difficult to estimate the impact that leisure and shopping activity has on the performance of the road network.

2.8. Ninety three percent of respondents to the council household travel survey, conducted by Qa Research said that they make journeys for 'local shopping / personal business'. The more local nature of these types of journeys was reflected in the modes of transport used, with 'walk' the most common mode. Around a fifth of respondents most often drive a car or van for these types of journeys.

2.9. The council has commissioned an analysis to understand which areas of the city have services such as education, health, leisure, and retail within a walkable distance. The output of this analysis is shown in Figure 31, which is a heatmap showing which areas of the city have a concentration of different services within walking distance.

2.10. Most areas of Brighton & Hove benefit from proximity to convenience retail and other associated local centre uses. In the council's City Plan a local centre is defined as a retail cluster that typically includes a small supermarket, a newsagent, post office, pharmacy, hot food takeaway and launderette.

2.11. Some areas, such as Moulescoomb, Hollingbury and Bevendean, have no identified retail clusters that meet the criteria to be classified as a local centres though local shops and smaller parades do provide for day-to-day services. We could expect that residents of these areas will need to travel further afield to meet their retail needs. To understand each area in detail we are able to draw on comprehensive Urban Characterisation Studies, which forms part of the evidence base for the City Plan[36].

[36] Brighton & Hove City Council 2009, Urban Characterisation Study

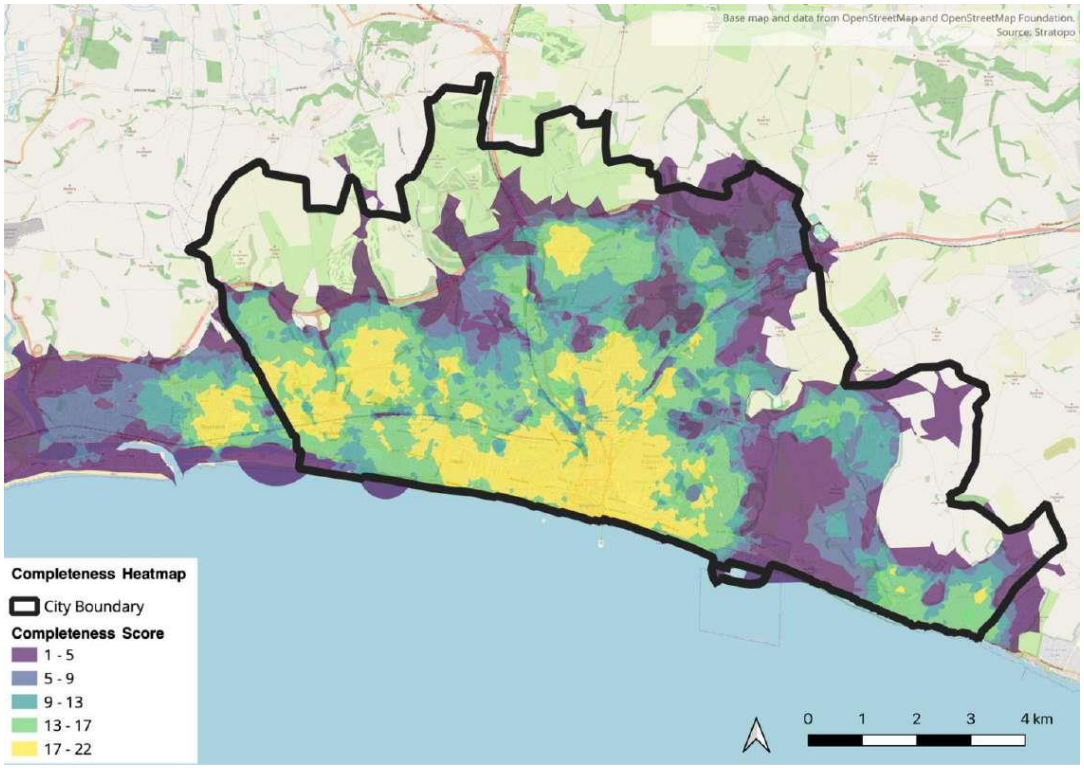


Figure 31. Heatmap of facilities within walking distance. The higher the score, the more complete the provision of services and facilities. Troy Planning + Design in partnership with Stratopo

2.12. Respondents to the council household travel survey said that when making journeys for 'city centre shopping / personal business', the most common mode of transport was 'bus' (45%), followed by 'walk' (23%), and responses varied significantly by ward. Those living in more central wards were more likely to walk, and those living in outlying wards were more likely to use a bus or car.

2.13. Respondents were most likely to use delivery services for 'other goods, for example, clothes, homeware, with 73% ever receiving deliveries, and this was also the most likely to be received more often than once a week (10% said 2-5 days a week).

2.14. Fifty-five percent of respondents reported that they receive deliveries of 'Takeaway food' and 36% receive deliveries of 'groceries (including milk deliveries)'. A smaller proportion of respondents ever receive deliveries of 'Prescriptions' (13%) or 'Subscription boxes (for example, fruit and veg)' (12%).

2.15. There were some significant differences by age group, particularly those aged 65+. Respondents in this age group were significantly less likely than other age groups to ever receive deliveries of 'other goods' (50%), 'groceries' (28%), and 'takeaways' (23%). They were, however, significantly more likely than other age groups to receive 'prescriptions' via home delivery (26%).

2.16. Overall, 83% of respondents said that they do not currently use pick-up points (as an alternative to home delivery). Of the 17% that do use dedicated pick-up points, walking or wheeling to collect (12%) or driving to collect (3%) were the two most common methods used to collect the goods. There was some demographic variation

in the usage of pick-up points. Those aged 25-34 are the most likely to use them (26%), and those aged 65+ are the least likely (9%).

2.17. Brighton & Hove's city centre is a regional destination, with a catchment extending beyond Sussex for both shopping and leisure trips. Brighton & Hove is also in the top 10 urban destinations for international visitors to the UK with 339,000 visits[37]. Proximity and easy access to Gatwick and London are contributory factors to the city's performance in international tourism.

2.18. Research[38] on visitors tends to focus on the number, origin and value of visitors to the city rather than impact on the transport network or visitors' satisfaction with it. However, results from a 2018 survey of visitors[39] show that 42% of all visitors had travelled to Brighton & Hove by private vehicle (car/ van/ motorcycle or motorhome), 54% of all visitors used public transport (a train or coach/bus service) and 2% had arrived in the city as part of a coach tour.

2.19. The most popular activity undertaken by visitors was just walking around (81%), followed by going out for something to eat (76%), visiting the beach/seafront (75%), shopping (51%), and visiting a tourist attraction (46%). The main attractions visited were the pier (59%), the Royal Pavilion (29%), and the British Airways i360 (23%). This suggests that walking was the primary mode of transport used by visitors.

2.20. Transport in the city was generally positively rated across different modes. 'Ease of finding way around' was scored 8.66 out of 10. Transport in the city – cycles and Transport in the city – buses both scored over 8. The one exception was 'value for money of parking' which scored 5.27 out of 10.

2.21. In 2019, the last year before the impact of Covid, there were 1.67 million visitors who stayed overnight and 10.7 million day visits. Visitors are most likely to come from the London area or the south east and consequently the A23 corridor is the most important for visitors to the city. The city receives a lot of day visitors who tend to travel from the capital at weekends, in the summer months and for big festivals and events.

2.22. In 2023, Brighton & Hove attracted approximately 11.8 million visits[40]. Of these, 1.6 million were overnight visitors. While this is below the 2019 figure it still generated £1.3 billion in economic impact and supported more than 23,742 full-time equivalent jobs. Day visitors and conference tourism are particularly strong markets for Brighton & Hove. The city ranks 15th position in the UK for corporate and national association meetings.

2.23. Commuter travel

2.24. In the 2021 census, there were 196,400 people of working age (16-64) in the city. 150,000 of these people were economically active, with 74,500 in full-time employment, 27,200 in part-time jobs, and 30,700 self-employed. A large number of

[37] International Passenger Survey 2022
[38] Sussex and Brighton & Hove visitor economy baseline report
[39] Brighton Visitor Survey 2018
[40] BRIGHTON & HOVE VISITOR ECONOMY - 2023

those in full-time employment are likely to have jobs with typical working hours and will be on the move in the AM and PM peak travel times.

2.25. There is a significant student population, making up about 12% of the city's residents. This figure is inclusive of those attending the two universities, students in 6th form education, and those attending further education colleges.

2.26. While the 2021 census was severely affected by Covid it acts as a useful case study for what the maximum level of working from home could possibly be; 42.7%. However, it does not tell us much about more typical commuting patterns. For this we have to look back to the 2011 census, while acknowledging that the pandemic will have led to some permanent alterations in how people travel. In 2011 only 7.6% of people worked from home in Brighton & Hove. The most popular method of travel to work was by car, at 37.5%, walking, at 20% and bus, at 13.6%.

2.27. In 2011 there were 32,000 people commuting into the city to work and 37,000 commuting out[41]. The below heatmap shows job density in the city. The concentration of jobs is highest in Brighton Central, although parts of Hove, the University campuses in Falmer and Shoreham port all have high job densities. These employment sites are trip generators at peak periods.

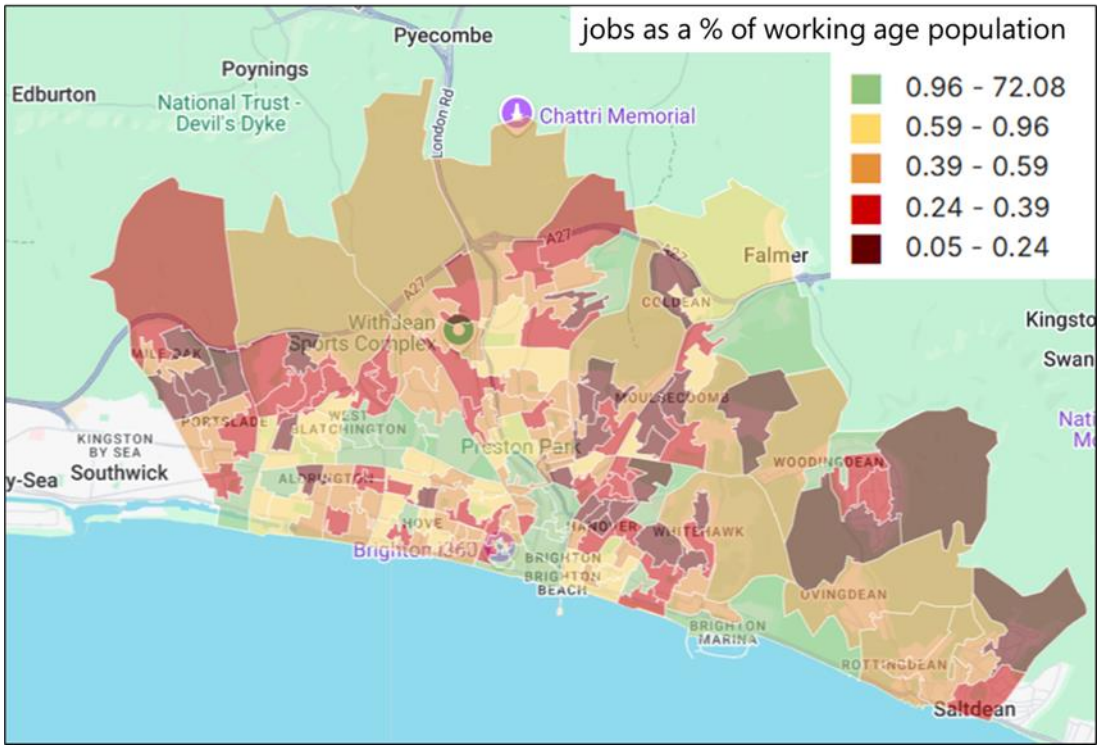


Figure 32 Brighton & Hove Job Density - jobs as a % of working age population

2.28. Figure 33 below illustrates travel-to-work inflows to central Brighton based on the 2011 Census. The thickness of the blue lines represents the number of people commuting from different destinations. The DataShine tool this map is taken from[42] illustrates the large number of journeys made by residents of Brighton & Hove to

[41] Brighton & Hove Economic Strategy, Socio-Economic Evidence Base 2018
[42] Datashine Commute. Produced by Oliver O'Brien

reach jobs in the city centre. It also shows the catchment area for commuters outside of the city who are far more likely to travel by car or rail to access jobs in the centre.

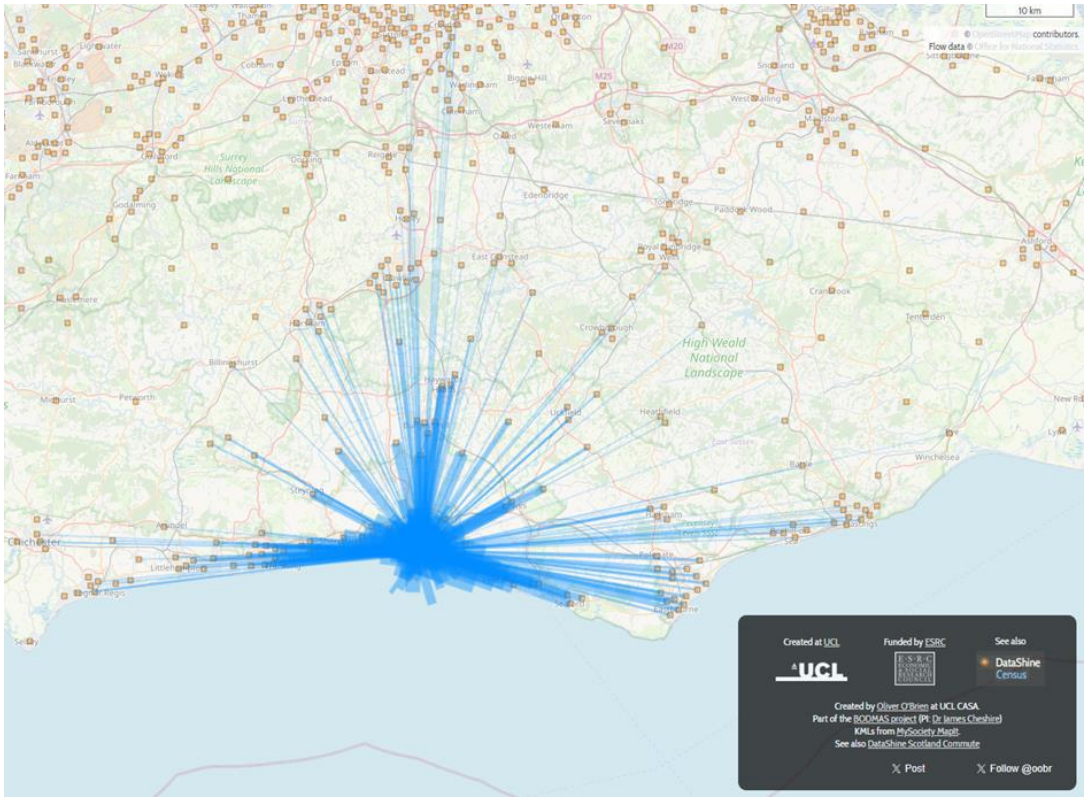


Figure 33: In commuting destinations to central Brighton produced by Oliver O'Brien

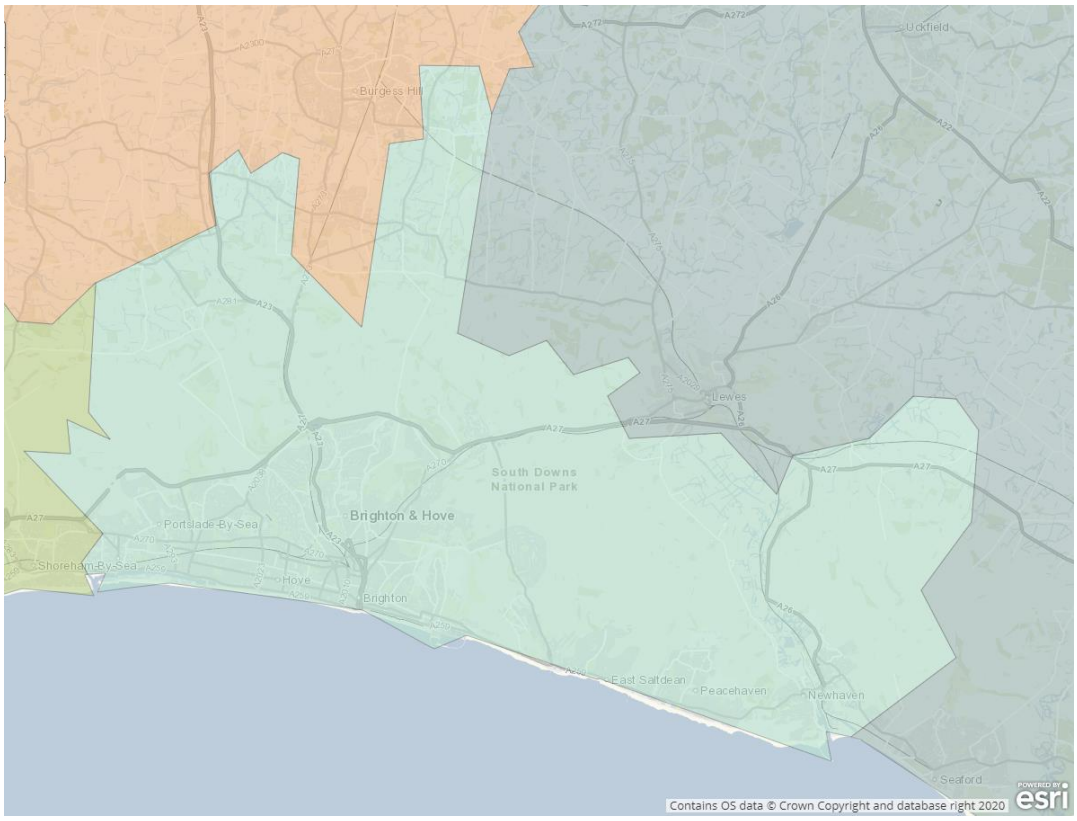


Figure 34 Travel To Work Areas (TTWA) Map

2.29. The commuting catchment of Brighton & Hove is shown by Figure 34 which is the Travel To Work Area (TTWA), based on the 2011 census. TTWAs are produced by statistical analysis and illustrate self-contained labour market areas. They represent areas where most people both live and work, and therefore, relatively few commuters will cross a TTWA boundary on their way to work. Brighton & Hove's TTWA is compact. It only reaches north to some parts of Burgess Hill and extends west just beyond the council's administrative boundary. It extends furthest eastwards, reaching as far as Newhaven.

2.30. Patterns for out commuting from Brighton & Hove are similar to in-flows, with residents of the city travelling to other local settlements such as Lewes for work. There are a significant minority of residents who commute out to central London, with rail being the predominate mode of travel for these trips.

2.31. According to the 2021 Census 37.4% of households within Brighton & Hove have no access to cars or vans, which is higher than England's average of 23.5%. Much of the city has a good level of bus service with 91% of households within 400m of a bus stop with a weekday daytime frequency of 15 minutes or more (BSIP 2021). There are higher rates of working from home, public and active transport use than the average for England. In Brighton & Hove 28.1% commuted via sustainable modes of transport, including 14.3% on foot, 7.1% by bus, 3.8% by bike, 2.5% by train, and 0.4% by taxi.

2.32. The council household survey shows that since Covid travel patterns have changed significantly. A quarter of those either employed or self-employed said that they work from home 'every day', whilst a further 30% said they work from home '2 to 4 days a week'. A minority said they work from home 'once a week' or less often, showing that where an individual works from home, it tends to be for a reasonable proportion of the time. Two fifths (38%) said that they 'never' work from home.

2.33. This pattern varies by the type of employment. Those in part-time paid employment were the most likely to say they 'never' work from home (58%). Meanwhile, those in full-time self-employment were the most likely to say they work from home 'every day' (37%).

2.34. Those working from home at least once a week were then asked to provide more detail about how a typical working week is split between home and their place of work. Levels of home working amongst this group are highest on a Monday and Tuesday (81%), with the proportion then dropping throughout the remaining weekdays to 77% on a Wednesday, 66% on a Thursday, and 65% on a Friday. As would be expected, the proportion working on a Saturday or Sunday is low, with a minority working at home at the weekend (5% on a Saturday and 3% on a Sunday).

2.35. Servicing & deliveries

2.36. Servicing and deliveries are hugely important for the economic health of the city. Detailed city level information about these kinds of trips is lacking so to understand trends that may be affecting Brighton & Hove we have relied on national studies that

are relevant to us. While it is true that more and more shopping is being done online[43] the impact of e-commerce on traffic is less than often imagined. The RAC foundation has concluded that e-commerce has actually had a limited positive effect[44]. A briefing note by the Centre for Sustainable Road Freight[45] also concluded that last-mile delivery of online shopping has resulted in an increase in total commercial freight transport between shops/depots and homes but with a related reduction in car trips and other modes of consumer shopping transport.

2.37. With regards reducing the impact of online shopping impacts on the transport network there are actions that can be taken, particularly around reducing failed delivery rates and reducing the frequency of returned goods. Further analysis is needed of the impact of general freight on the road network and how this can be minimised.

2.38. Figure 35 shows the upward trend of Light Goods Vehicles (LGVs) registered in the city. There were 11,900 LGVs or vans registered in the Brighton & Hove area in 2023, which is 10.7% of the total fleet. However, most vans (54%) are used for carrying equipment, tools, and materials in the service of tradespeople or builders[46]. Delivery or collection of goods accounts for 16% of van usage, although a greater proportion of mileage as they are more intensively used.

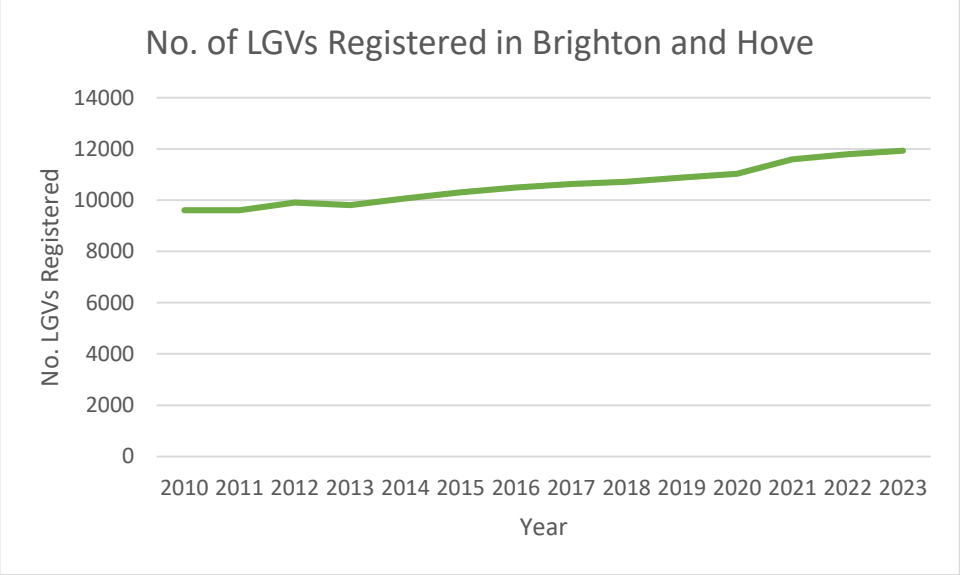


Figure 35. Number of licensed LGVs in Brighton and Hove between 2010 and 2023. Source: Vehicle licensing statistics data tables

[43] ONS. E-commerce & ICT activity
[44] RAC Foundation. 2017: Implications of Internet Shopping Growth on Van Fleet and Traffic Activity
[45] Centre for Sustainable Road Freight. 2021: Online shopping and last mile deliveries.
[46] DfT. Statistical Release – Vans. April 2021

3. Part 3 Carbon emissions and quantifying reductions

3.1. This part of the document is split into three sections. The context and background section covers what the national requirement for carbon emission reduction is and specific actions required in the surface transport sector. The second section on baseline emissions looks at what future emissions in Brighton & Hove are estimated to be, excluding policies contained in Our Transport Plan 2035. It also discusses what emissions need to be reduced by if national emission reduction targets are to be met. The third section assesses what impact the policies in Our City Transport Plan 2035 will have on reducing emissions. **Error! Reference source not found.** illustrates the emissions assessment processes we have undertaken.

Figure 36. Process for quantifying the impact transport policies will have on carbon emission reduction

3.2. Context and background

3.3. To help meet the UK's legally binding commitments around carbon emission reduction, the 2008 Climate Change Act (amended in 2019) established the Committee on Climate Change (CCC). This expert, independent body advises the UK and devolved governments on meeting greenhouse gas (GHG) emission targets and reports to Parliament on the progress made in reducing them. While the end goal is to achieve Net Zero by 2050, the volume of emissions emitted between now and 2050 is just as important. The UK has agreed a set amount of carbon it can emit over this period, referred to as a carbon budget.

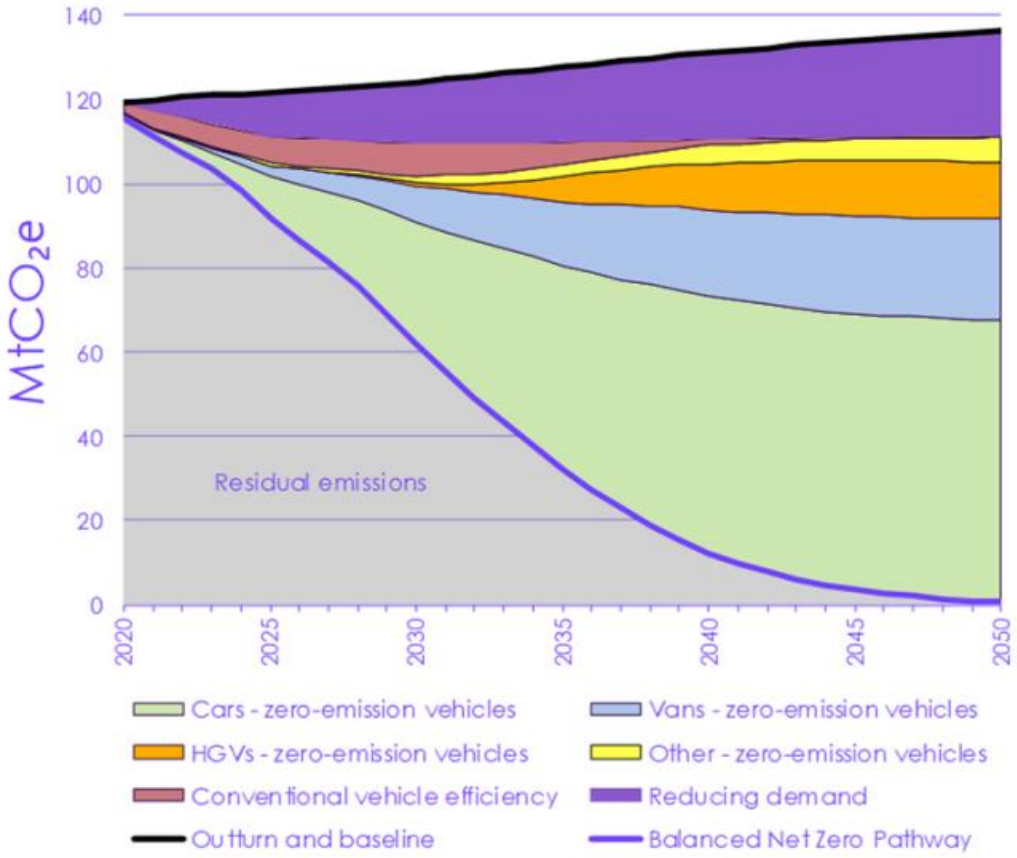
Greenhouse gases (GHGs) explained. GHG emissions refers to a group of gases, which includes carbon dioxide, methane, nitrous oxide and others. When present in our atmosphere these GHGs trap heat within it. In this document the term 'carbon emissions' is used to refer to all GHGs. Carbon dioxide is the most prevalent of the GHGs and GHG emissions are reported in units of carbon dioxide equivalent (**CO_2e).** This unit takes account of the different heating impacts of the various GHGs, methane for example traps 28 times more heat over a 20-year period than carbon, and reports them as an equivalent amount of carbon dioxide.

3.4. Since 2008 central government has been required to set carbon budgets for 5-year periods, twelve years in advance. The CCC assists in the budget setting process by producing a report with recommendations. We are now in the 4th carbon budget period, which covers 2023-2027 and allows 1,950MtCO2e to be emitted within that period. The 5th and 6th carbon budgets have already been published to cover the period up to 2037. For context, in 2019, the total emissions from surface transport in the UK were 113MtCO2e; 22% of the total annual UK GHG emissions.

3.5. The CCC has assessed how the UK can stay within its carbon budget and have produced a preferred 'balanced pathway' to Net Zero. They have also published a summary of what measures are required to reduce carbon emissions from the surface transport sector[47]. There are three key actions:

- transitioning the UK fleet of vehicles so that they are zero emission
- reducing travel demand and shifting journeys onto lower carbon modes
- making fossil fuel-powered vehicles more fuel efficient

3.6. The chart below illustrates how these three actions will contribute to achieving the balanced pathway to reduce emissions at the national level. Up to 2025, the most significant emissions reductions will be made by reducing demand / achieving modal shift and improving conventional vehicle efficiency. As the proportion of zero-emission vehicles in the UK fleet grows, so does their contribution to reducing emissions. Zero-emission cars and vans will make the earliest and largest impact, with HGVs decarbonising from 2030 onwards.



Source: BEIS (2020) *Provisional UK greenhouse gas emissions national statistics 2019*; CCC analysis.

Figure 37. Surface Transport GHG emission reductions by area in the balanced pathway scenario. Chart reproduced from the CCC's Sixth Carbon Budget: Surface Transport.

[47] The Sixth Carbon Budget, Surface Transport. CCC

3.7. While carbon budgets at the national level are well established, they do not exist for individual local authority areas. Our City Transport Plan 2035 is the first transport strategy we have written that includes an estimate of local carbon emissions and an estimate of the impact our policies will have on reducing them. To do this, we have used a tool commissioned by England's sub-national transport bodies (STBs) specifically for this purpose: the Carbon Assessment Playbook (CAP), which was launched in September 2024.

3.8. Guidance on how local authorities should quantify carbon emissions for local transport planning was published in August 2025[48]. Chapter 3 of this guidance,on estimating current and future emissions at an area-wide level refers to the CAP; 'In most regions, area-wide estimates of user carbon have already been prepared at a regional level. Where this is the case, authorities can obtain this and will not need to undertake the analysis themselves. Tools and resources also exist to help local authorities estimate infrastructure emissions across their activities.'

3.9. Brighton & Hove Baseline Emissions

3.10. There are different ways of measuring GHG emissions. The CAP tool measures territorial emissions, those generated within the administrative boundary of the council. The territorial focus means that transport activity by residents of Brighton & Hove, which occurs outside the boundaries of the council, is excluded. The CAP tool limits the scope of emissions to only include those elements of the transport network that we have direct influence or control over; the road network. Emissions from the use of the rail lines within Brighton & Hove are outside of our influence. For the avoidance of doubt, emissions that are out of scope are listed in Table 6, along with the responsible body.

Excluded emissions	Reason	Responsible body
Travel by Brighton & Hove residents is outside of the council's administrative area.	Outside of the council territorial area and control.	DfT
From the manufacture of vehicles and fuel used within the council's administrative area.	Outside of the council territorial area and control.	No single organisation.
From the rail network within Brighton & Hove.	Outside of the council control	DfT
From the maintenance/repair of the local road network.	To be assessed in future Highway Asset Management Plan updates.	The council

Table 6. Out-of-scope Emissions, Corresponding Reasons and responsible bodies

3.11. Underpinning the data in the CAP tool are estimates produced by the Department for Energy Security and Net Zero (DESNZ) of CO_2 emissions attributable to the local road network for each local transport authority. This estimate is based on the observed mileage travelled, the fleet composition, and fuel consumption. A fuller

[48] Local Transport quantifiable carbon guidance

explanation of the methodology is available in the relevant technical note[49]. The baseline year used in the CAP tool is 2019 to avoid the disruption caused by the Covid-19 pandemic.

3.12. The CAP tool shows historic GHG emissions from vehicles using the council's road network, up to 2019. It also contains three future scenarios of what annual emissions up to 2050 could be. The main variable between the three scenarios is the rate at which EVs replace conventionally powered vehicles. The rate of uptake of EVs varies greatly across the UK, meaning that road-based emissions will fall much faster in some areas than others. Sales of EVs in the Brighton & Hove area tend to be around the national average[50].

3.13. In this document, we have chosen to use just one of these scenarios as our future baseline (known as localised ZEV uptake within the CAP) as it best reflects current national policies, such as the Zero Emission Vehicle (ZEV) mandate. As with any modelling of future events, the future baseline is not a prediction of what will happen, but rather a guide to what is probable.

> The Zero Emission Vehicle mandate came into effect in January 2024. It requires car manufacturers to sell a minimum percentage of electric vehicles each year or face financial penalties. In 2024 22% of manufacturer's new car sales and 10% of their van sales had to be zero emission. This target rises each year so that by 2030 80% of new car sales and 70% of new van sales have to be zero emission. By 2035 100% of car and van sales need to be zero emission.

3.14. It should be noted that up until 2023, the uptake of EVs within Brighton & Hove was below the projections used in our future baseline scenario. Under the future baseline, 5% of the car and van fleet using our roads were projected to be zero-emission in 2023. However, only 2% of vehicles registered in Brighton & Hove in 2023 were zero-emission. With approximately 104,300 vehicles registered in Brighton & Hove, this means that there were around 3,100 fewer zero-emission vehicles registered than projected. We anticipate that the ZEV mandate will greatly increase the sales of zero-emission vehicles. Full year data on local vehicle registrations have yet to be released for 2024, but we will continue to monitor uptake data to ensure that our chosen future baseline is the most appropriate to use.

3.15. While the CAP includes future baseline scenarios that take into account the varying uptake of EVs in different areas, it does not include localised carbon pathways that do the same. Instead, it scales the CCC national balanced pathway for road-based emissions to each local area. This acts as an indicative trajectory of how quickly road-based emissions would need to fall if following the same pace as that of the national pathway. Some local authority areas could be expected to overperform against the national balanced pathway, while others underperform. Without localised carbon reduction pathways that coordinate the variable emissions reductions across regions, we do not have specific carbon emission reductions that we need to achieve.

[49] 2005-2020 UK local and regional greenhouse gas emissions technical report
[50] DfT Vehicle licensing statistics

3.16. Figure 38 below shows Brighton & Hove's historic GHG emissions up to 2019, our projected future baseline of emissions, and a locally scaled version of the CCC national balanced pathway, which acts as a rough guide of where emissions need to be. It illustrates that more than 400ktCO_2e of GHG emissions were produced by vehicles within Brighton & Hove in 2005. While there have been some fluctuations, the overall trend has been downward, reaching 329ktCO_2e in 2019.

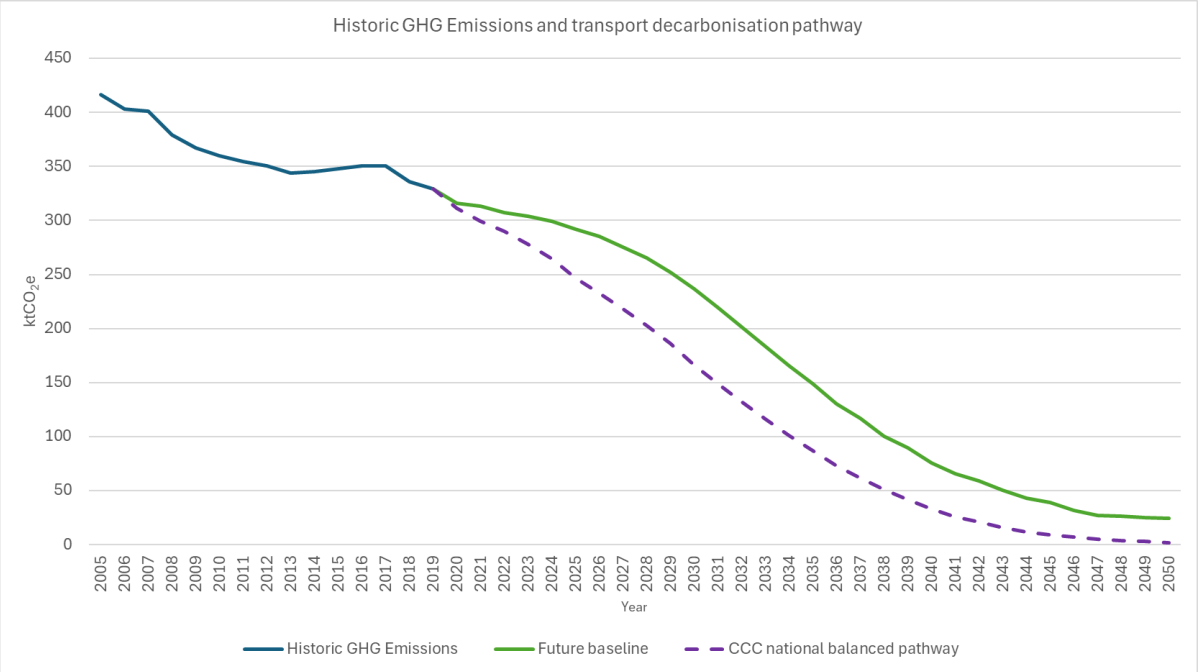


Figure 38. Past and projected emissions from vehicles using the road network within Brighton & Hove.

3.17. The future baseline scenario anticipates that carbon emissions will continue to decrease, but the reductions will not be enough to meet the locally scaled national balanced pathway to Net Zero. By 2035, emissions are projected to drop to 149ktCO_2e under the future baseline scenario. If local emissions within Brighton & Hove were to exactly mirror the rate of reduction required at the national level, then by 2035 local emissions would need to be 87ktCO_2e.

3.18. Figure 39 shows the cumulative carbon emissions over the period 2019 – 2050 under both the future baseline and locally scaled CCC national balanced pathway. Using the balanced pathway as a guide, Brighton & Hove's approximate carbon budget from road transport emissions would be around 3,978ktCO_2e. between 2019-2050. Under the future baseline scenario, we are projected to emit 5,300ktCO_2e, which is 1,322ktCO2e more. To greatly reduce this gap, additional policy measures are needed at both the national and local levels.

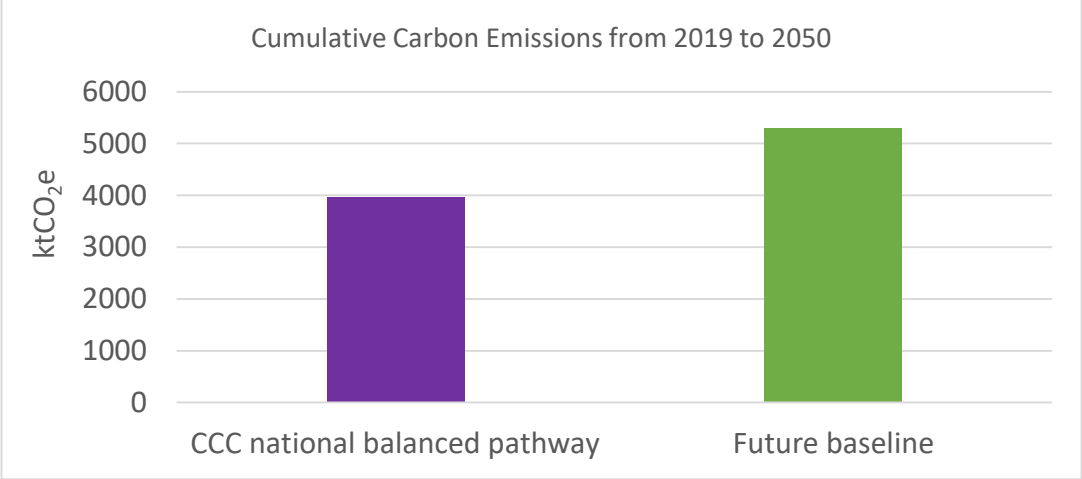


Figure 39. Cumulative carbon emissions from 2019 to 2050

3.19. Quantifying emissions reductions of local policy measures

3.20. This section presents our assessment of the impact that policies contained in Our City Transport Plan 2035 will have on reducing emissions. As noted in paragraph 3.5 the CCC has set out three key actions required to reduce carbon emissions from the surface transport sector. Firstly, transitioning the UK fleet of vehicles so that they are zero emissions. Secondly, reducing travel demand and shifting journeys onto lower-carbon modes. And thirdly, making fossil fuel-powered vehicles more fuel efficient.

3.21. National policies, such as the ZEV mandate, will be instrumental in delivering these three measures, but local policies also have a role to play. The council can support people switching to zero-emission vehicles by providing access to electric vehicle charging infrastructure. This is essential for those who do not have access to off-street parking and who will rely on public chargers to refuel. For larger vehicles, like buses and trucks, it is unclear if the route to Net Zero will be electrification or an alternative, like hydrogen. However, for cars and vans, electrification is the most likely route, with many EV models already available. The council's Electric Vehicle Charging Plan sets out the details of how we will provide charging infrastructure.

3.22. Reducing travel demand can be achieved through measures such as increased homeworking. Through management of the roads under our control, the council can also influence people's travel choices and make choosing low-carbon modes, such as public transport, walking, and cycling, easier. The CCC has concluded that these measures are necessary to achieve Net Zero[47] and stay within the national carbon budget. Improving walking and cycling infrastructure, along with bus priority measures, are proven ways for transport authorities to enable more people to use these modes.

3.23. The third key action, making fossil fuel-powered vehicles more efficient, is a measure that will largely be driven by central government regulation and industry. Over the past two decades, vehicle fuel efficiency has improved, but since 2017, average vehicle emissions have increased. The CCC attributes this to the increase in purchases of larger vehicles, such as SUVs[51]. Through our parking policies, it is possible that the council could incentivise the purchase of smaller, lighter vehicles.

[51] Sector Summary: Surface Transport, page 62

3.24. The CAP includes a Policy Builder tool that contains 29 different types of transport interventions. In the tool, the city is split into 33 zones, known as medium level super output areas (MSOA), as shown in Figure 45. The areas are categorised into inner urban and city suburban based on the typical transport usage profile of households within the MSOA.

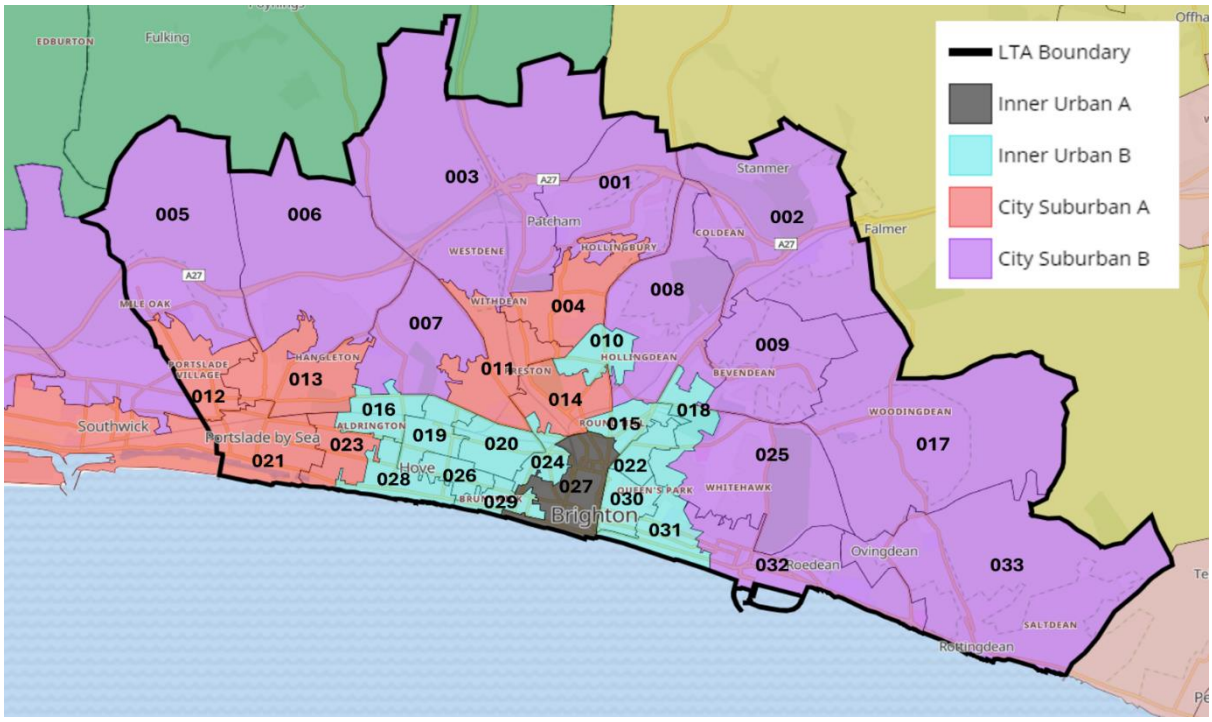


Figure 40. MSOA-sized Zones within the council

3.25. In the Policy Builder tool, we can build up a package of interventions. For each intervention, we can choose where (geographical scope), when (build profile) and at what intensity the different interventions would be implemented up until 2050. The tool then estimates what the cumulative impact of the chosen policy measures will be.

3.26. The 29 interventions are shown in Table 7 below. One limitation of the Policy Builder tool is that the list of policy measures is not exhaustive. For example, there are no measures that will impact van freight emissions, such as freight consolidation centres.

Category	Intervention
Active travel	Improved pedestrian infrastructure
Active travel	Improved cycling infrastructure
Active travel	(e-)Mobility hire schemes
Behavioural change	Area-wide travel planning/mobility management
Behavioural change	EV car clubs
Behavioural change	Incentive-based apps
Behavioural change	Campaigns for a switch to LEV fleets

Behavioural change	Business Travel Plans
Behavioural change	Support for car sharing
Behavioural change	School Travel Plans
Integrated planning policy	20-Minute neighbourhoods
Integrated planning policy	High-density developments
Low-emission vehicles	Low-emission public transport fleets
Low-emission vehicles	EV Charging infrastructure
Low-emission vehicles	Support EV uptake in corporate fleets
Parking, charging & traffic management	Road user charging/tolls
Parking, charging & traffic management	Off-street parking measures
Parking, charging & traffic management	On-street parking measures
Parking, charging & traffic management	Workplace parking levy
Parking, charging & traffic management	Low Traffic Neighbourhoods (LTNs)
Parking, charging & traffic management	Cordon-based charges and restrictions
Public transport	Bus priority measures
Public transport	Improved bus/LRT frequency
Public transport	Mobility hubs
Public transport	Reduced public transport fares
Public transport	Demand-responsive transport (DRT)
Public transport	Extended public transport network
Public transport	New rail stations/line opening
Technology	Integrated ticketing, information & Mobility as a Service

Table 7. The 29 interventions in the CAP Policy Builder tool

3.27. We created three packages of interventions in the Policy Builder tool to represent different scenarios. These are listed in Table 8. The Business-as-Usual scenario (BaU) is based on existing commitments that have been made, excluding any new proposals in Our City Transport Plan 2035. In contrast, the Do Max scenario attempts to understand what impact local policies would have if we committed to doing everything possible to reduce carbon emissions. It is intended to illustrate what the limit is to what we can achieve locally. The Our City Transport Plan 2035 scenario is based on the policies contained in the proposed plan.

Scenarios	**Assumptions**	**Number of interventions applied**
Business as Usual (BAU)	Current levels of funding and a similar level of intervention in the recent past	15
Our City Transport Plan 2035	Some increased funding and a greater level of intervention	27
Do Max	Generous resources and GHG reduction are the overriding priority	28

Table 8. The council Transport Policy Scenarios and Assumptions

3.28. Each scenario is underpinned by a set of assumptions about which interventions will be implemented, where, how intensely, and over what time period. Table 9 shows a

worked example for the intervention road user charging/tolls to demonstrate our approach.

Scenarios	Assumption	Geographical Scope	Build Profile	Intensity
BAU	No road user charging is introduced.	NA	NA	NA
Our City Transport Plan 2035	The UK govt. introduces a road user charging scheme to replace other road taxes /fuel duty.	Whole city	2040-2042	100
Do Max	The UK govt. introduces a road user charging scheme to replace other road taxes /fuel duty.	Whole city	2030-2032	100

Table 9. Assumptions used for intervention on road user charging/tolls.

3.29. In the BAU scenario, we assume that there is no introduction of road user charging. In the Our City Transport Plan 2035 and Do Max scenarios, we make the assumption that road user charging would only work as a nationwide scheme that replaces existing taxes on vehicles such as fuel duty. In the Do Max scenario, we assume that the date of implementation is at the earliest feasible date, 2030-2032. In the Our City Transport 2035 scenario, we assume that charges are introduced in 2040-42.

3.30. This worked example illustrates how the Policy Builder tool necessitates us to make assumptions about possible future scenarios. Assumptions used for specific interventions in the Our City Transport Plan 2035 scenario should not be interpreted as policy commitments. They only represent one possible way that policies could be implemented.

3.31. In the case of a national road user charging scheme, it is not something that the council has the power to implement. Our assumptions regarding road user charging are based on it being a possible future measure and that if it were implemented, it would make sense to do so at the national level rather than individual cities or regions bringing forward their own.

3.32. Because the list of policy interventions in the Policy Builder tool is not exhaustive, the CAP includes a function that allows us to address this by applying estimates of what impact policies may have on areas that are not covered in the tool. These are referred to in the CAP as emission levers.

3.33. We have applied 3 emission levers in the dashboard:

- urban freight solutions – modifying HGV and LGV movements within the urban area
- HGV fuel composition – assessing the impact of accelerating reduction in internal combustion engine-powered HGVs
- car speed on the Strategic Road Network – considering the effect of a reduction in car speed across all types of vehicles

3.34. In the CAP tool, freight vehicles are projected to account for 34.34% of road user emissions by 2050. This represents a significant opportunity for emission reduction that could be addressed. By applying the above emission levers, freight vehicles'

emissions are projected to decrease from 46.57ktCO_2e to 3.48ktCO_2e, with their share of overall emissions falling from 34.34% to 19.80%.

3.35. Figure 41 and 42 show the outputs of the modelling exercise using the Policy Builder tool. The graph in Figure 41 shows the annual reduction in carbon emissions under the modelled scenario and Figure 42 shows the cumulative carbon emissions from 2019 to 2050 under each scenario, compared with the CCC national balanced pathway scaled to local emissions.

3.36. Under the future baseline scenario emissions from use of roads within Brighton & Hove are projected to be 5,300 ktCO2e between 2019 - 2050. Under the locally scaled CCC balanced pathway Brighton & Hove's carbon budget for the same period is 3,978 ktCO_2e, a difference of 1,322 ktCO2e.

3.37. It is clear that all three policy scenarios we have modelled, even the BaU scenario which would be a continuation of our existing policies, will have a significant impact on carbon emissions. However, even the do maximum scenario where emissions are projected to be 4,557 ktCO2e, will not meet those of the locally scaled CCC balanced pathway.

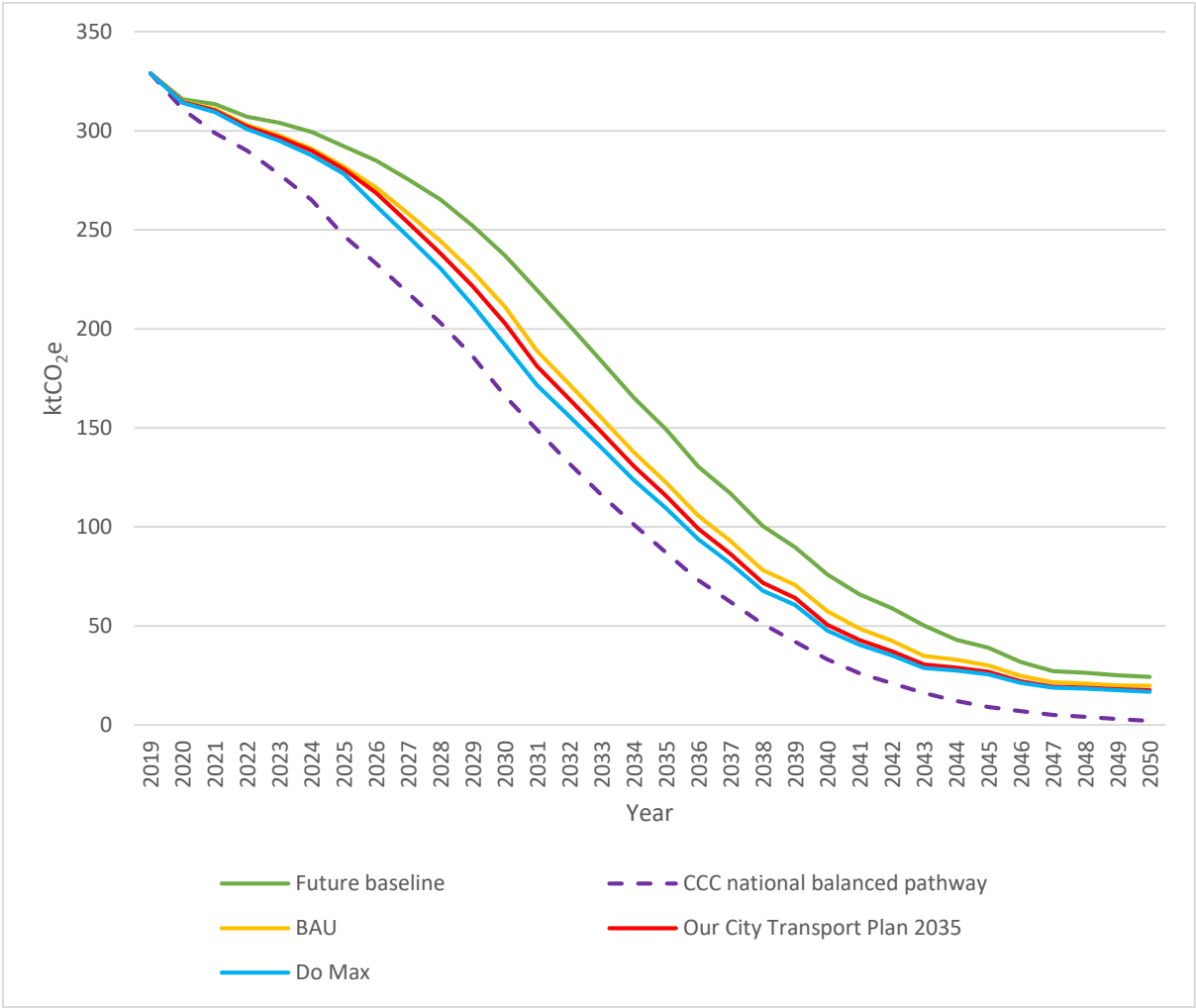


Figure 41. Estimated carbon emission reductions under three future policy scenarios

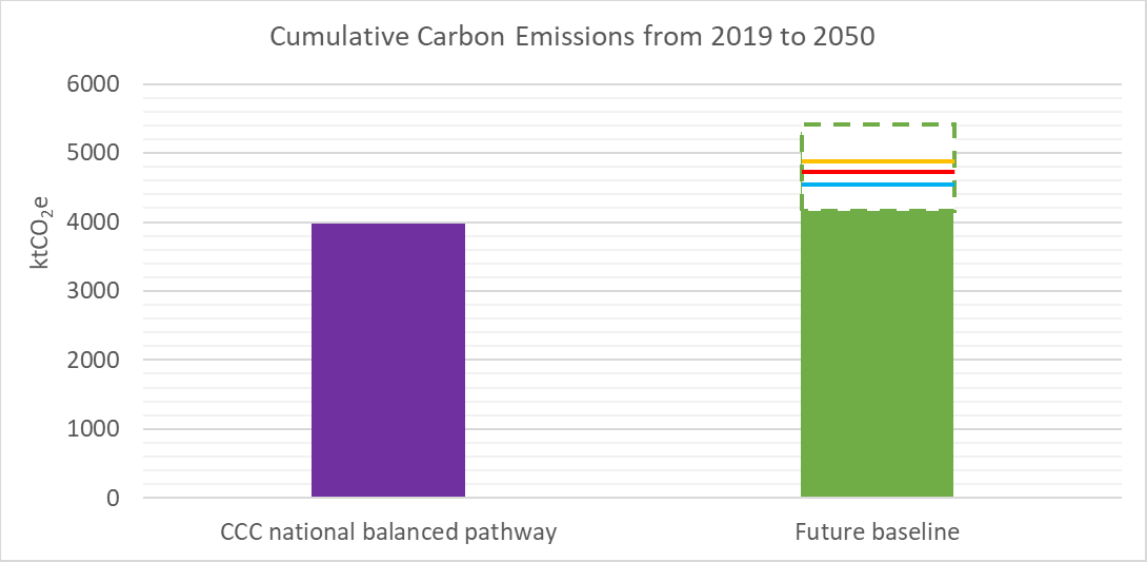


Figure 42. Cumulative carbon emissions from 2019 to 2050

3.38. What this finding means will depend on what other local authorities' findings are. It may be that some are going beyond the locally scaled CCC balanced pathway, to counteract those areas not reaching it. However, if the majority of local authorities are in the same position as us then a discussion with central government will need to take place to understand what additional actions are required and how they will be implemented.

4. Part 4: Policy Alignment Review

4.1. Table 10 lists relevant policies and guidance that has been considered in the creation of Our City Transport Plan 2035.

Publishing body, date: policy	Scope	Alignment
DfT, Integrated National Transport Strategy	National	N/A - Currently being formulated after a call for ideas.
DfT, 2017: Investment Strategy	National	There is good alignment between Our City Transport Plan the Objectives of the DfT Investment Strategy and Our vision, explicitly aligns with the four objectives of the Investment Strategy particularly the objective of creating a more reliable, less congested and better-connected transport network and ultimately making Brighton & Hove a more attractive place for business, trade and invest.
DfT, 2017: Cycling & Walking Investment Strategy	National	There is excellent alignment between these objectives and those in Our City Transport Plan 2035. Similar to the objectives outlined in the Cycling and Walking Investment Strategy, our focus is on creating well-maintained streets and pavements, expanding active travel choices, and delivering a safe, inclusive, and integrated transport system. These efforts aim to encourage more residents to adopt active travel modes and reduce the number of KSI cyclists and pedestrians.
DfT, 2021: Transport Decarbonisation Plan	National	There is good alignment with the Transport Decarbonisation Plan and Our City Transport Plan has been completed using the Carbon Assessment Playbook tool to quantify the impact of our policies.
DfT, 2018: Inclusive Transport Strategy	National	There is excellent alignment between our policies and the Inclusive Transport Strategy. Our approach includes improving pavement and road design for better accessibility, enhancing bus and taxi services, and addressing transport-related social exclusion. We aim to work collaboratively with Brighton & Hove Buses to provide more accessible services with key destinations across the city.
DfT, 2019: Future of Mobility: Urban Strategy	National	We aim to leverage technology to improve travel management and reduce congestion through enhanced data collection and enforcement. Recognising electric and hydrogen power as key solutions for decarbonisation, we also see the potential of innovative mobility hubs in creating a more integrated transport network. The council remains adaptable to future advancements in technology and shifts in consumer adoption.
DfT, 2020: Gear Change – a bold vision for cycling and walking	National	The document highlights the benefits of cycling and walking in relation to health, wellbeing, congestion, environmental and air quality, economy. By providing a better-connected transport network with well-maintained streets, pavements, and cycling

		infrastructure and by encouraging residents to shift to active travel, we can improve public health and wellbeing, enhance air quality, reduce road congestion, and boost shopping footfall.
DfT, 2021: Bus Back Better	National	The strategy focuses on making buses more frequent, faster, reliable, cheaper, and comprehensive. Our vision aligns excellently with this by enhancing bus reliability and speed through dedicated bus priority corridors, improving connections to the suburbs and beyond, and providing better bus service information.
DfT, 2022: Future of Freight Plan	National	While not all of the actions of the Freight plan are for local authorities to deliver there is good alignment in the area of Net Zero and decarbonising transport.
DfT, 2022: UK Electric Vehicle Infrastructure Strategy	National	There is excellent alignment between our plan and this strategy with a strong focus on the challenge of supporting householders without off street parking to be able to switch to EVs.
DfT, 2023: The Plan for Drivers	National	We share the goal of providing smoother journeys and supporting the transition to zero-emission driving. Our 'seek and fix' programme helps identify and repair defective carriageways efficiently.
DfT, 2024: National Networks National Policy Statement	National	The statement focuses on maintaining network performance, meeting customer needs, supporting economic growth, ensuring resilience in networks, advancing net-zero priorities, and enhancing safety. Our key objectives align with these aims by reducing road congestion, maintaining streets and pavements, supporting the transition to low and zero-emission vehicles, and leveraging technology for more effective road management.
DfT, 2024: National Bus Strategy: 2024 Bus Service Improvement Plans	National	The strategy focuses on making buses more frequent, faster, reliable, cheaper, and comprehensive. Our vision aligns with this by enhancing bus reliability and speed through dedicated bus priority corridors, improving connections to the suburbs and beyond, and providing better bus service information.
HM Treasury, 2020: The National Infrastructure Strategy	National	The strategy aims to decarbonise the economy and adapt to climate change by electrification of vehicles and advancing newer technologies such as carbon capture and low-carbon hydrogen. We also focus on facilitating the transition to low and zero-emission vehicles and recognising electric and hydrogen power as a viable solution.
Defra, 2019: Clean Air Strategy	National	The strategy prioritises protecting public health by reducing emissions, including those from transport. We aim to support the transition to low and zero-emission vehicles and recognise electric and hydrogen power as a viable solution.
Department for Levelling Up, Housing and Communities, 2022: Levelling Up the United Kingdom	National	Levelling Up aims to provide everyone with the opportunity to thrive by improving transport, digital connectivity, health, wellbeing, and so on. One of its key missions is to enhance transport networks in all major urban centres and improve local public

		transport connectivity across the country, closer to London's standards. Our vision aligns with this striving for a better-connected city that enhances quality of life in a healthy, inclusive, and sustainable city.
DfDCMS, 2022: Digital Strategy	National	It aims to drive economic growth and innovation by enhancing digital infrastructure, supporting tech businesses, improving digital skills, and strengthening cybersecurity. While not directly related to transport, advancements in digital technology may reduce the need to travel by enabling more remote work. The City Plan outlines how we support the supply and maintenance of efficient digital and telecommunication infrastructure across the city.
Department for Energy Security and Net Zero, 2023: Carbon Budget Delivery Plan	National	This plan outlines how the government aims to meet its legally binding carbon budgets and progress toward net zero by 2050. It includes policies to accelerate the transition to clean energy, support low-carbon transport, and more. As part of the national effort, we have adopted the newly launched Carbon Assessment Playbook to evaluate the carbon impact of various interventions, helping to guide decision-making toward lower emissions.
Department for Culture, Media and Sport, 2023: Get Active: A Strategy for sport and Physical Activity	National	This strategy sets out how the government's commitment is to ensuring everyone has the opportunity to be active. Aligning with this goal, we focus on providing safe and inclusive active travel choices to encourage more people to incorporate physical activity into their daily journeys.
Ministry of Housing, 2025: National Policy Framework	National	It provides a framework for locally prepared plans that can provide for housing and other development sustainably. Our City Transport Plan 2035, alongside the City Plan, sets out a vision and strategic approach for delivering sustainable transport and development in the city.
Defra, 2023: The Air Quality Strategy for England	England	It defines local authorities' powers, responsibilities, and actions to improve air quality for communities. Our focus on reducing road congestion, promoting low and zero-emission vehicles, increasing public transport use, and encouraging active travel aligns with these goals to create cleaner air in the city.
Public Health England, 2020: PHE Strategy	England	The strategy aims to enhance safety, prevent poor health, reduce health inequalities, and support a strong economy. Encouraging people to incorporate physical activity into their daily travel can improve overall health and wellbeing.
TfSE, 2020: Transport Strategy	Regional	This strategy has been referred to throughout the document and schemes in it included within this Plan.
TfSE, 2023: Strategic Investment Plan	Regional	It outlines the region's priorities for transport infrastructure and investment to support sustainable economic growth. Some of the proposed schemes in this plan will

		enhance the connectivity of the city to other areas, improving access to key destinations and supporting regional development.
TfSE, 2018: Economic Connectivity Review	Regional	It emphasises the importance of improving transport links to boost economic performance and ensure greater resilience in the region. We share this goal of improving our transport and travel network to ensure people can move around safely, sustainably, and easily.
Brighton & Hove City Council, 2023: The Council Plan	Local	Our vision is for Brighton & Hove to be a city to be proud of, a healthy, fair, and inclusive city where everyone thrives. Our City Transport Plan 2035 was developed to help achieve this vision by shaping a sustainable and accessible transport future.
Brighton & Hove City Council, 2023: The City Plan part 1 & part 2	Local	They are development plans for the city and a key plan to deliver the transport goals in our City Transport Plan 2035.
Brighton & Hove City Council, 2018: Economic Plan 2024-2027	Local	It outlines a strategic pathway towards a more competitive, productive, fairer and greener economy. Our City Transport Plan 2035 supports delivery of this vision by reducing congestion on our roads and aiming to create a more sustainable, inclusive and accessible transport network.
Brighton & Hove City Council, 2019: Joint Health & Wellbeing Strategy	Local	This strategy envisions that everyone in the city will have the best opportunity to live a healthy, happy and fulfilling life. Our City Transport Plan 2035 supports this by encouraging active travel, helping people stay more active and healthier.
Brighton & Hove City Council 2024-2034: Sport and Physical Activity Strategy	Local	This strategy envisions a more active, healthier city. Our City Transport Plan 2035 supports this goal by enhancing pavements and cycling facilities and delivering new walking and cycling infrastructure to encourage active travel.
Brighton & Hove City Council, 2023: Accessible City Strategy	Local	The council envisions a welcoming, inclusive and accessible city, striving to go beyond legal minimum when providing barrier-free services. Our City Transport Plan 2035 aligns with this vision, aiming to create a truly inclusive transport system.
Brighton & Hove City Council, Air Quality Action Plan 2022-27	Local	Our plan is strongly focused on improving air quality and reducing carbon emissions with the objective of facilitating the uptake of low and zero emission vehicles.
Brighton & Hove City Council, 2030 Carbon Neutral Programme	Local	Our plan is strongly focused on improving air quality and reducing carbon emissions with the objective of facilitating the uptake of low and zero emission vehicles.

Table 10. Relevant Policies and Guidance considered in Our City Transport Plan

5. Part 5: Challenges and Summary

5.1. While there are a variety of transport challenges facing the city this evidence base has been used to identify the priorities that will be addressed in Our City Transport Plan 2035.

Challenge 1: Enabling more people to live safer, healthier and more active lives

5.2. Each year over the past decade the number of people killed and seriously injured on our roads has not reduced and remains around 150 per year. This is unacceptably high. Vulnerable road users, those walking, wheeling, cycling and on motorbikes are at most risk. We believe this number can and should be reduced.

5.3. Related to improving safety is encouraging more people to live active lives because of the health benefits this will being. The council's Sport and Physical Activity Strategy sets out the evidence on the levels of inactivity in the city. For example, less than 50% of children under 16 in the city meet recommended activity guidelines each day. It also sets the objective of creating active environments, which this objective in Our City Transport plan 2035 supports.

Challenge 2: Reduce congestion on our roads

5.4. Figure 13 illustrates that the average delay on local A Roads within Brighton & Hove is among the worst in the country. This is an important challenge to prioritise and tackle because reducing congestion and improving the speed of journeys within the city underpins the economic growth of the city and peoples experience of whether this is a good place to live and visit.

Challenge 3: Supporting the transition to zero and ultra-low emission vehicles

5.5. This challenge focuses on a specific measure that will be highly effective in both improving air quality and reducing carbon emissions. The council's Air Quality Action Plan 2022-27 sets out what the health impacts of air pollution are and why it needs to be addressed. The threat of climate change and need to kerb GHG emissions is also set out elsewhere, such as the DfT's Transport Decarbonisation Plan.

5.6. It is in the Transport Decarbonisation Plan that central government has identified the role local authorities have to play in facilitating the shift to electric vehicles, particularly for households that lack access to off-street parking.

Challenge 4: Creating a transport network that is more inclusive

5.7. The Council Plan 2023-2027 and Accessibility Strategy set out the council's aim to ensure that the city is an inclusive place for all. The evidence presented here is clear that accessing key services is more difficult for those who are less well-off and live in more suburban parts of the city. The evidence is also clear that disabled people make fewer trips and find it harder to access transport. Making a more inclusive transport network has therefore been identified as a challenge that is a priority.

Challenge 5: Maintaining our roads and managing them as efficiently as possible

5.8. Surveys we have commissioned into the condition of our footways and roads shows clearly that the funding which has been allocated to their upkeep over the past 10 years has been inadequate to maintain them. If this continues the state of our streets will continue to worsen. It is basic and fundamental to the good functioning of the city that our streets are kept in a good condition, but securing the finance to do this will be a challenge.

6. Glossary

AQMA – Air Quality Management Areas

Brighton & Hove City Council – The council

BSIP – Bus Service Improvement Plan. A plan setting out improvements up to 2025 and backed by over 27m of central government funding.

CAP – Carbon Assessment Playbook

CCC – Committee on Climate Change. An independent, statutory body established by the Climate Change Act 2008. Its purpose is to advise central government on emissions targets and to report to Parliament on progress made in reducing greenhouse gas emissions and preparing for and adapting to the impacts of climate change.

DESNZ – Department for Energy Security and Net Zero

GHG – Greenhouse Gases

HGV –Heavy Goods Vehicle

KSI – Killed or seriously injured

$ktCO_2e$ – Kilotons of carbon dioxide equivalent. A standardised measure of greenhouse gases, which includes carbon dioxide, methane, nitrous oxide and so on, and expresses the impact they have as an equivalent amount of carbon dioxide.

LGV – Light Goods Vehicle

LCWIP – Local Cycling and Walking Infrastructure Plan

MRN – Major Road Network

MtCO2e – Million tons of carbon dioxide equivalent. A standardised measure of greenhouse gases, which includes carbon dioxide, methane, nitrous oxide and so on, and expresses the impact they have as an equivalent amount of carbon dioxide.

NHT – National Highways and Transport. An organisation which runs a public satisfaction survey. In 2023 111 local authorities participated. In this report tables show the council's score along with a colour indicating how well we performed against other local authorities.

Colour indicating the council's performance is in the top 25% or quartile
Colour indicating the council's performance is in the second quartile and above average
Colour indicating the council's performance is in the third quartile and below average
Colour indicating the council's performance is in the bottom 25% or quartile

NO_2 – Nitrogen Dioxide

NSL – National Speed Limit

NTS – National Travel Survey. Annual survey of approximately 16,000 individuals in 7,000 English households.

PM – Particulate Matter

SRN – Strategic Road Network

STB – Sub-regional transport bodies

TfSE –Transport for the South-East

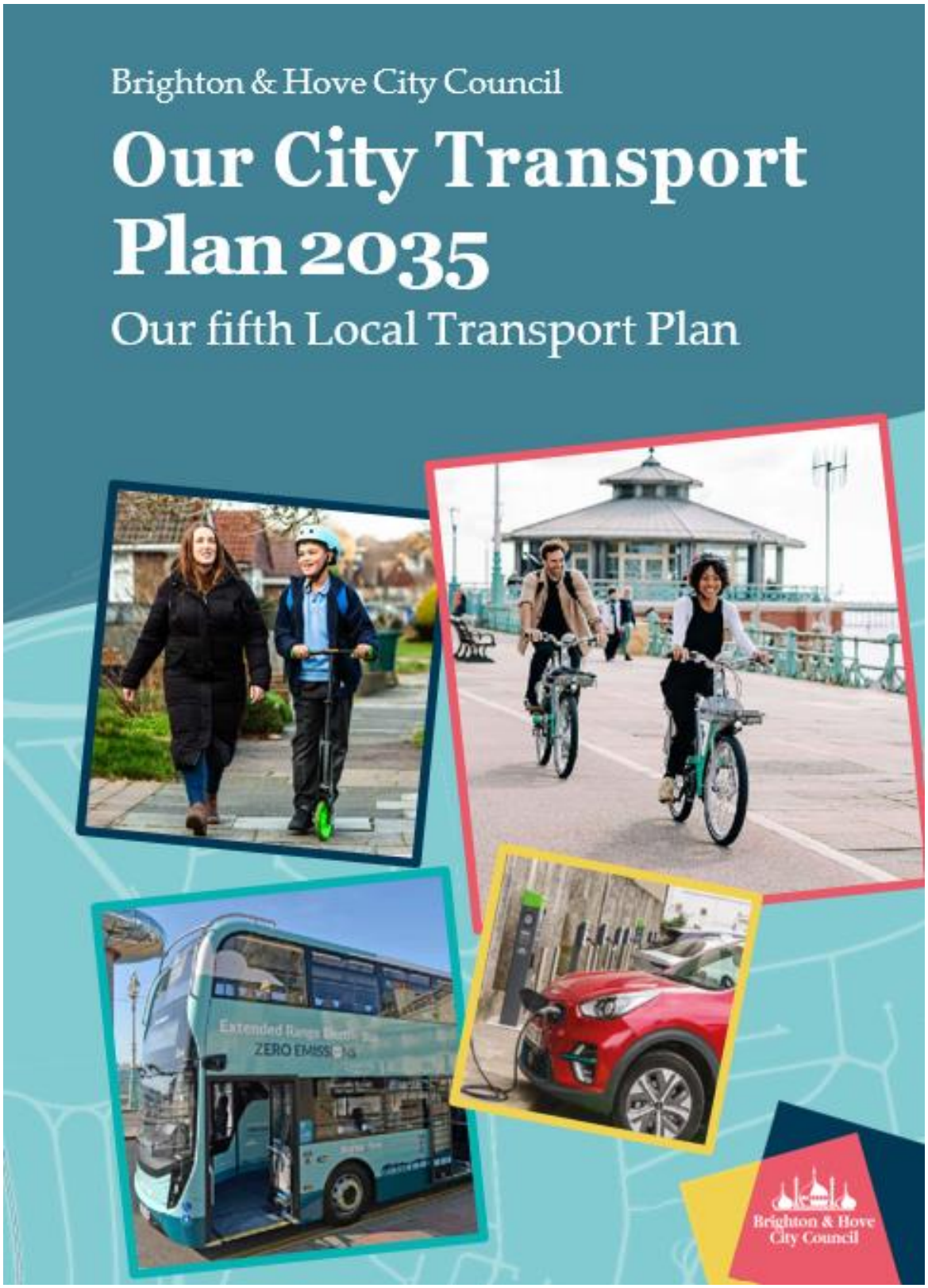
TTWA – Travel To Work Areas

ULEZ – Ultra-low Emission Zone

ZEV – Zero Emission Vehicle

Consultation Report:

Our City Transport Plan 2035



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2 Public consultation – summary

We held a public consultation between 18 June 2025 and 12 September 2025, on the policies contained within the draft version of ‘Our City Transport Plan 2035’. The consultation was chiefly promoted through the council’s website, social media, press releases and through direct emails to local stakeholder groups. We also had advertisements on screens at libraries and sent posters to various organisations across the city.

Our City Transport Plan 2035, along with supporting documents, was available to read online. Paper copies were available in libraries or on request. The main channel for public feedback was an online survey hosted on the council’s consultation portal, Your Voice. There were also opportunities for people to discuss the plan face to face with council officers at drop-in sessions held in local libraries.

We held dedicated sessions at schools to hear from young people, and on Your Voice we hosted a survey adapted to be more accessible for under 18s. We held a 90-minute workshop with a Get Involved Group, organised by Possability People to hear the views of disabled people. A full list of events, poster distribution and workshops/ focus groups are shown in Annex 1 – List of events, workshops and poster distributionIn summary our engagement activity consisted of:

- 500 on-line survey responses.
- A week-long public exhibition at Jubilee Library
- Seven drop-in sessions held in 6 libraries across the city
- Eleven workshops or meetings with stakeholders, including with the Transport Partnership, Local Access Forum and Destination Experience Group.

Figure 1: Consultation postcard

Figure 1 shows an example of the promotional materials developed for the consultation. Postcards, with QR codes to the on-line survey were handed out at events to people who didn’t have time to stop and talk to us.

The main learning from the consultation was that:

- There was a broad agreement that the challenges facing the city had been correctly identified by the plan.
- There was strong support for four of the plans objectives with the objective of 'maintaining our roads and managing them as efficiently as possible' being the best supported.
- All objectives had more support than opposition.
- Disabled people raised strong concerns around accessibility.

3 Online survey feedback

3.1 Process

Our consultation platform, Your Voice, hosted two surveys; our main survey and an adapted version aimed to be more accessible to young people. We invited people to answer a series of questions on; their general travel habits, the challenges identified by the plan, the objectives of the plan and whether they supported specific schemes to be delivered over the coming 5 years. Paper copies of the consultation documents and the questionnaire were available on request. Questions of the survey are listed in Appendix A – Online survey questions. 490 (98%) responses were received online and 10 (2.0%) were received by emails, mainly from organisations or groups.

3.2 Survey results

Respondents & their travel habits

The survey was open to everyone; residents, visitors, people who work here.

Q How are you responding to this survey?

The overwhelming majority of responses, 87%, were from residents. 10% were from people who work or study in the city, 8% were on behalf of an organisation or business and just 3% were from visitors to the city.

The survey asked about people's travel habits before moving onto questions specific to the transport plan. This allows us to see whether the travel habits of people responding to the survey are broadly representative of the general population.

Q What mode of travel do you mostly use for different types of trips?

- Commuting to work: 35% said not applicable. Among the rest, travel modes were fairly evenly distributed, with walking, cycling, bus, train and car accounting for 10-15% each.
- Education: 75% said not applicable. Of the remainder, 8% walk, around 5% use cycling, bus or car; and 2% travel by train.
- Shopping: 35% walk, 24% travel by car, 22% use the bus and 14% cycle.

- Leisure: 33% walk, 23% cycle, while bus and car use are slightly lower at 16-19%.
- Visit the city: 30% walk and 33% use the bus, 13% cycle, 6% travel by car and 5% by train.
- Other modes (Taxi or private hire vehicle, mobility scooter or wheelchair, motorbike or moped): each account for than 1% across all trip purposes.

	1 - Not applicable	2 - Walk	3 - Cycle	4 - Bus	5 - Train	6 - Car	7 - Taxi or private hire vehicle	8 - Mobility scooter or wheelchair	9 - Motorbike or moped
Commuting to work	35.11%	14.04%	15.5%	9.93%	12.59%	11.86%	0.48%	0.24%	0.24%
For education	74.93%	8.45%	5.72%	4.9%	1.63%	4.09%	0%	0.27%	0%
For shopping	3.94%	34.24%	14.04%	21.67%	1.48%	23.89%	0.25%	0.25%	0.25%
For leisure	1.96%	33.33%	23.04%	19.36%	4.66%	16.18%	0.74%	0.49%	0.25%
Visit the city	11.93%	30.46%	13.2%	32.74%	4.82%	6.35%	0.25%	0.25%	0%

Figure 2: Mode of travel respondents mostly use for different types of trip

We have compared the travel habits of respondents to the public consultation with those of a household survey carried out in 2024, which was designed to be representative of the city's population. This shows that respondents to the consultation were more likely than the general population to use sustainable transport such as walking, cycling, buses and trains for work, education and leisure trips.

This means the consultation responses lean towards sustainable transport users, and therefore are *not fully representative* of the wider city population.

For shopping, two categories were considered in the household survey, city centre and local shopping. Respondents who walked or used buses fell between the proportions seen for city centre and local shopping. Cycling was chosen at around 3 times the general public rate, while car use was similar to local shopping levels but higher than for city centre shopping. Train use among respondents was comparable to both shopping categories. There was no direct trip purpose for visiting the city in

the data (though more detailed purposes like visiting health facilities were included), so no comparison was made for this category.

Transport challenges

Respondents were asked to indicate their level of agreement with the key transport challenges the plan identified. A five-point scale allowed people to: strongly agree, agree, neither agree nor disagree, disagree or strongly disagree.

Q Do you agree or disagree that these 5 challenges are what we should focus our resources on tackling?

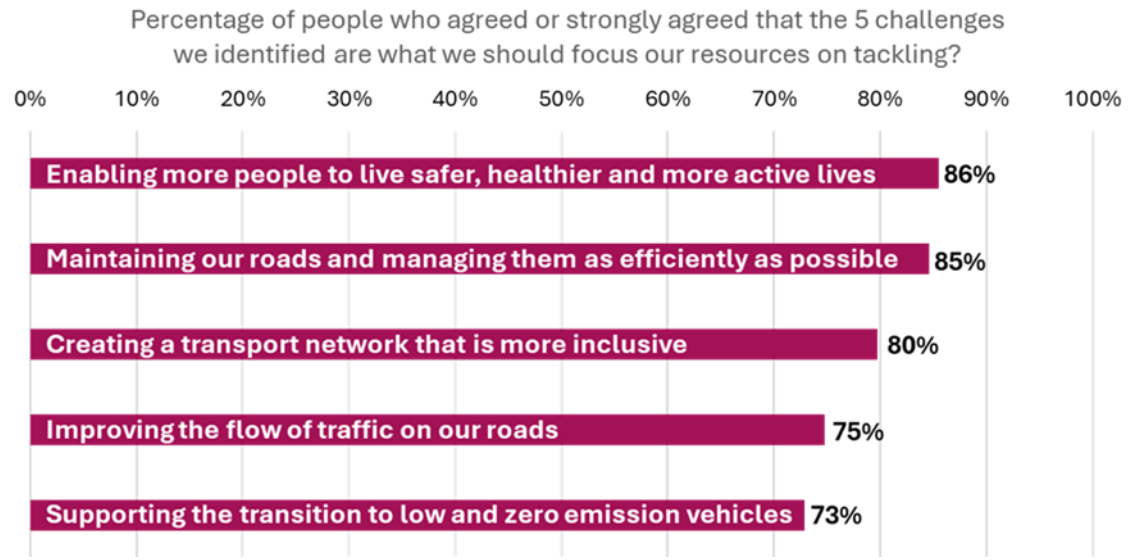

Figure 3: Percentage of respondents who selected 'strongly agree' or 'agree' with the identified transport challenges in the plan

458 people responded to this question. Figure 3 shows the percentage of respondents who selected 'strongly agree' or 'agree' with the transport challenges identified in the plan. Each challenge received support from at least 73% of respondents. In the case of 'Supporting the transition to low and zero emission vehicles', which had the lowest level of support, only 11% of respondents actively disagreed with this challenge while 17% neither agreed nor disagreed. The challenges that had the most support, with greater than 85% of respondents agreeing with them, were 'Enabling more people to live safer, healthier and more active lives' and 'Maintaining our roads and managing them as efficiently as possible'.

People were offered the opportunity to provide comments at specific points in the survey, one of which was on the challenges. However, it was rare for people to use the comments box to respond directly to the questions asked and the comments given were more general in nature regarding transport in the city. For this reason, all comments provided have been analysed together. This is presented in Table 3: Respondents' comments by themesTable 3.

Transport objectives

Again, respondents were asked to indicate their level of agreement using a five-point scale: strongly agree, agree, neither agree nor disagree, disagree or strongly disagree.

Q Do you agree or disagree that these objectives will address the challenges facing the city?

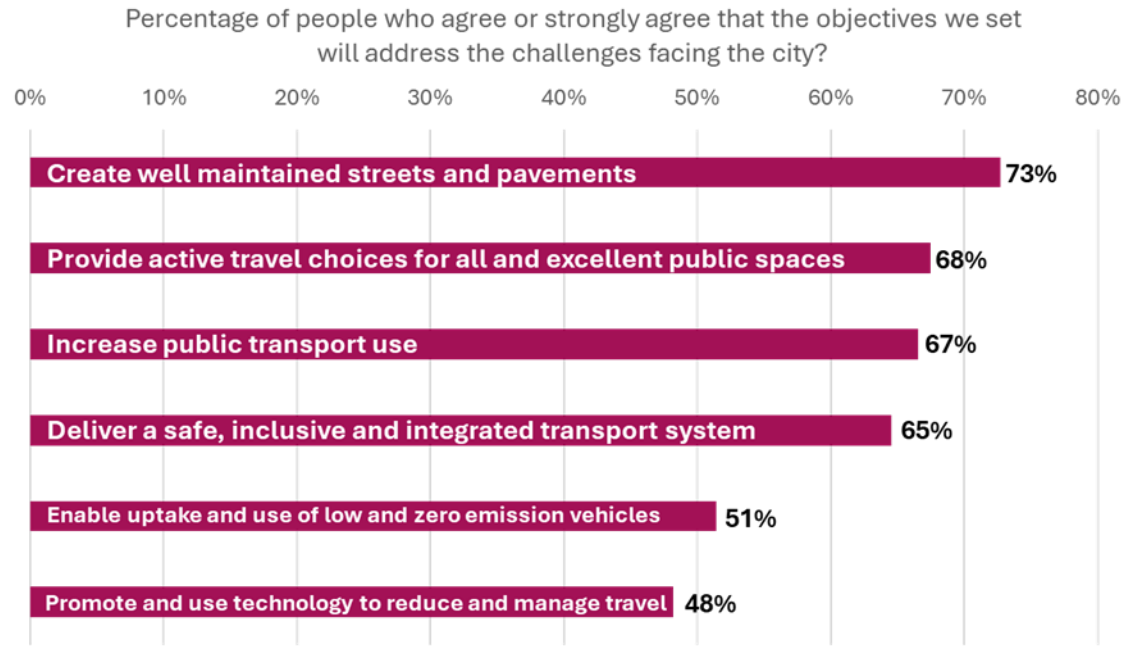

Figure 4: Percentage of respondents who selected 'strongly agree' or 'agree' with the proposed objectives in the plan

455 people responded to this question. Figure 4 shows the percentage of respondents who selected 'strongly agree' or 'agree' with the 6 proposed objectives in the plan. There was a good level of support for four of the objectives with at least 65% of respondents agreeing with them. The objective of 'Create well maintained streets and pavements' was best supported with 73% of respondents in agreement. There was less support for the objectives of 'Enabling the uptake and use of low and zero emission vehicles' at 51% and 'Promote and use technology to reduce and manage travel' at 48%. The percentage of people who disagreed with these objectives were 32% and 27% respectively.

Project types

Q Please rank the project types below in order of importance to you.

The plan set out they were invited to rank both the project types and major schemes according to their importance. The ranking of the seven project types is presented below with *Subsiding public transport to make it more affordable* receiving the strongest support while *Installing electric vehicle chargepoints* receiving the least support.

		Average Score
1.	**Subsidising public transport to make it more affordable**	3.0
2.	**Supporting and encouraging residents, visitors and businesses to use public transport and active travel**	3.3
3.	**Maintenance of our roads and pavements**	3.7
4.	**Improving safety with new crossings for pedestrians, targeted improvements at junctions and outside schools**	3.7
5.	**Improving the accessibility of our streets**	4.3
6.	**Providing local transport hubs where a range of transport modes can be accessed**	4.5
7.	**Installing electric vehicle chargepoints**	5.6

Table 1: Ranking of proposed projects

On the right-hand side, the average scores alongside each project type are shown. The average was calculated by weighting the number of respondents across the priority levels. A lower average score indicates that more respondents ranked the project as a highest priority (i.e. closer to rank 1), while a higher average score reflects lower priority rankings. The scores range from 3.0 to 5.6 which is relatively wide, suggesting that respondents expressed strong differences in their priorities across the project types.

Major schemes

Q Please rank the below major schemes in order of importance to you.

Similar to project types, the ranking of the six major schemes with the average score shown alongside each type.

		Average Score
1.	**Improving priority routes for active travel (walking, wheeling and cycling)**	2.9
2.	**Improving the look and feel of the city centre to make it more pedestrian friendly**	3.1
3.	**Improving bus journeys times in the city through bus lanes and red routes**	3.3
4.	**Sussex Coast Mass Rapid Transit – an express bus or tram that provides quicker connections between Brighton & Hove and other nearby coastal towns**	3.8

5.	**Improving access to the city centre**	3.9
6.	**New transport hubs at the city's edge offering Park & Ride, EV charging, vehicle hire and help reduce city truck traffic**	4.0

Table 2: Ranking of major schemes

Among the six major schemes, Improving priority routes for active travel (walking, wheeling and cycling) received the strongest support. In contrast, *new transport hubs at the city's edge offering Park & Ride, EV charging, vehicle hire and help reduce city truck traffic* received the lease support. This pattern broadly reflects the priorities seen in the project types.

Compare with the average scores of project types, the variation in the scores of major schemes is smaller ranging from 2.9 to 4.0, indicating that respondents viewed all six major schemes as having relatively similar importance.

Public's responses

Respondents also had the opportunity to provide additional comments on the challenges, objectives and the overall plan. For the purpose of analysis, we have amalgamated the answers to these two questions: ***Do you wish to share any comments to support your answers*** **and** ***Please share any other comments about Our City Transport Plan 2035*****.** Many respondents did not answer the questions as written but tended to give general comments as answers to both.

Comments have been coded into themes and number of times each theme was raised has been recorded in Table 3.

Written comments are consistent with how they rated or ranked the challenges/ objectives and projects. For examples:

- The public requested safe cycle network linking different parts of Brighton and more segregated cycle lanes. This reflects the most supported challenges and the second most supported objective, both of which focus on active lives and active travel choices, as well as the highest-ranked major scheme.
- Pavement condition was the third most frequently raised theme under active travel and road condition issues were also highlighted. These concerns align with the most supported objective, the second most supported challenge and the third-ranked project type.
- Public transport affordability was the most raised sub-theme under public transport, echoing the project type ranked first.

Themes	Sub-themes	Comments (top 10 for each theme)	No. of times raised
Active travel	Cycle network	Safe cycle network linking different parts of Brighton/ more segregated cycle lanes	41
	General support	Active travel should be the main priority/ is an effective way to improve transport	34
	Pedestrian	Pavement condition issues (e.g. tree roots growing through pavements, weeds, narrow)	26
	Pedestrianisation & public realm	More designated pedestrian areas	26
	Cycle network	Unsafe to cycle/ insufficient clear and safe cycle routes/ gaps within network	20
	Cycle parking	More secure cycle parking including parking for e-bikes	20
	Less focus	Stop prioritising cycling and red routes	12
	General opposition	Active travel options are not always appropriate.	7
	Pavement clutter	Obstructions block pavement	6
	School streets	School streets are good and should expand	3
Micromobility	E-scooter	Legalise e-scooters	4
Public transport	Bus & train	Affordability - expensive fares	74
	Bus	Dissatisfied with bus services - unreliable, delays, long journey times, live information not working, crowded, unsafe	62
	Mass rapid transit scheme	Calls for trams, underground train systems	30
	Bus	Improve coverage - more bus routes and bus stops to link up every part of Brighton	27
	Inclusivity	Public transport is not accessible and inclusive enough (e.g. not everyone knows how to use app).	25
	General support	Promote use of public transport	21
	Ticketing	Lack of integrated ticketing on local trains and different bus companies	10

Themes	Sub-themes	Comments (top 10 for each theme)	No. of times raised
	Rail connectivity	Improve regional connectivity	7
	Carbon emissions	Support for low and zero emission public transport	6
	Bus	Support for locally own buses/ public ownership	4
Congestion	Congestions	Congestion due to delivery vehicles, tourists, spaces for pedestrians and cyclists	47
	Rat runs	Call to tackle rat runs	1
Maintenance	Roads	Roads condition issues (e.g. potholes)	42
	General comments	Road maintenance is important but not as important as the others	3
	General comments	Maintain existing roads before developing something new	2
Electric vehicles (EVs)	General opposition	EVs do not address congestion, road safety and wilder environment issues. Also, EVs are expensive.	38
	EV chargepoints	Calls for affordable, accessible EV chargepoint network	17
	Opposition to private EVs	Disagreement for EVs as private vehicles	7
Parking	Inclusivity	Parking stress - insufficient spaces, high parking cost, accessibility for disabled people and ease of parking (e.g. do not know how to use mobile phone)	18
	Infrastructure	Better parking infrastructure such as underground/ off-street parking	8
	Cost	Increase parking charges for visitors	6
	Specific jobs	Some jobs such as social workers and traders require vehicles to function	6
	Less parking spaces	Free up on-street parking spaces for protected cycle infrastructure and wider pavements	4
Park & Ride (P&R)	Support with suggestions	Calls for an affordable P&R and to restrict parking in the city centre	34

Themes	Sub-themes	Comments (top 10 for each theme)	No. of times raised
	General opposition	Disagreement in P&R as it still involves vehicles.	7
	General support	Support for P&R	4
Mobility hubs	General support	Support for mobility hubs	5
Environment	Air & noise pollution	Concerns about pollutions especially in the city centre	22
	Street greening	Greater focus on greening our streets and showcasing our heritage	3
Car club	Accessibility	Efficient car club infrastructure/ car club on every street	5
	Affordability	Not affordable	3
	Informal car share	Support for informal car share	2
City centre	Congestion charge	Support for congestion charge/ car free city centre	28
	Parking	City centre is unattractive to visit as it is difficult to park.	15
	Parking	Reduce city centre parking/ reallocate parking spaces to residents' parking	11
	General comments	City centre is accessible/ Valley Gardens makes the place safer	2
Crime	Enforcement	Suggested parking and speeding on 20mph roads enforced by CCTV and Traffic Regulation Orders	7
Inclusivity	School travel	Concerns about transport inclusivity, accessibility and affordability for students	11
	Council's responsibility	Council needs to actively consult and engage with the community	9
	Council's policy	Red routes reduce accessibility to disabled people	8
	Disabled parking	Insufficient disabled parking, parking duration	7
	Access for all	Need a transport system that is inclusive regardless of income	4

Themes	Sub-themes	Comments (top 10 for each theme)	No. of times raised
	Accessibility	More dropped kerbs	3
Private car	Reduce cars	Reduce cars and car journeys	34
	Negative impacts	Concerns about car dominance/ car reliance/ high car ownership	24
	Alternatives	Prioritise viable alternatives (safer, more accessible, cleaner)	19
	Negative impacts	Vehicle size concerns - larger and heavier vehicles pay the same parking charge, but induce more pollution	9
	A27 junctions	Improve A27 junction capacity	2
	Education	Educate drivers on the Highway Code	2
Safety	Pedestrians	Concern about risks posed by e-scooters, delivery e-bikes and cyclist behaviour	23
	Parking	Pavement parking creates safety issues and reduces spaces/ pedestrians	13
	Cycling	Careless drivers make cycling dangerous	9
	Cycle theft	Risk of bikes being stolen/ insufficient safe parking and cargo bike parking	5
	Pedestrians	Concern about pedestrian safety/ unsafe crossings	8
		Campaign for cyclists/ Powered-two-wheeled vehicles to obey road rules	6
	Floating bus stops	Disagreement on floating bus stops	3
	Lighting	Unsafe in unlit areas	3
	Active travel	Properly segregate shared space	2
	Traffic calming	Speed bumps, continuous/ zebra crossings to slow vehicle speeds	2
	Safety concerns	Increasing anti-social behaviour	2

Themes	Sub-themes	Comments (top 10 for each theme)	No. of times raised
Technology	General opposition	Never sure about technology being a clear positive/ costly	9
	Driverless cars	Concern about their introduction (e.g. vague responsibility of collisions)	8
	General support	Technology will be useful if it increases convenience for people	3
Our City Transport Plan 2035	General opposition	The plan will inconvenience car drivers	15
	General support	Support for all objectives and want to see them to be executed	15
	Online survey	Dissatisfied with the survey design	10
	General support	Support for all challenges	7
	Challenge 2	Traffic flow includes flow of people/ improve traffic flow has a limit and should not be the primary focus	7
	General opposition	Too much emphasis on cycling - no more cycle lanes and narrow pavements and widening the roads	5
	Document	Specific things such as disabled access and parking, neighbouring towns, transition away from car ownership has not been mentioned sufficiently in the document.	4
	Follow-up	Great to have a follow-up with more quantified targets when time and funding allow	4
	Objectives	Objectives are not appealing	3
	Contradiction	Not realistic to improve traffic flow and safety at the same time/ improve traffic flow and rely on tourism	3
Scheme specific	Preston Village	Support for Renew Preston Village Campaign	31
	Beryl Bike	Expensive, no nearby bike bay, bike design is too big for some people	10
	A23 active travel scheme	Concern about Dyke Road/ Dyke Road drive layout/ complete safe cycle lanes along the road	4
	School transport	Not mention enough about school transport/ call for school team to do a plan	3

Themes	Sub-themes	Comments (top 10 for each theme)	No. of times raised
	Red routes	Support for more red routes	2
	Parking companies	High charges	2
Other	Council policy	Council policy can cause congestion (e.g. Valley Gardens, A259 pier roundabout)	20
	Funding	Make sure an even coverage of - city investment	4
	Vision	Be ambitious on making the city cleaner and more active	3

Table 3: Respondents' comments by themes

Organisational responses

A wide range of organisations provided comments, including public bodies, neighbouring local authority, internal council teams and local stakeholder groups and local businesses. Their key points are summarised by organisation below, in alphabetical order. Full comments are provided in Appendix C - Organisational responses.

Bricycles

- Include reducing car journeys as a specific objective.
- Ensure the Park & Ride scheme is effective by removing city centre parking and reallocating spaces for residents and active travel infrastructure.
- Promote active travel through safe and secure cycling options, accessible to children, low-income residents, and disabled people.
- Support a car-free city centre in key areas (Lanes and North Laine) to improve walkability.

Brighton & Hove Bus and Coach Company

- Highlighted congestion is the biggest issue, harming bus speeds, reliability, and fares; called for stronger bus priority.
- Welcomed red routes and service improvements but raised concern that active travel schemes/traffic lights can slow buses.
- Noted challenges of converting depots to EVs.
- Called for fully accessible bus infrastructure, improved night bus services, and quicker rollout of bus priority at traffic lights.

Brighton & Hove City Council – Air quality

- Raise concern that emissions and air quality not specifically mentioned in the priority order.
- Recommend consistent reference to ultra-low and zero throughout the plan.

Brighton & Hove City Council – Planning Policy

- Strongly support the objective of giving more people the choice of active travel to manage impacts of new developments.
- Emphasised strong links between Our City Transport Plan 2035 and City Plan 2041
- Look forward to continued close working as both plans evolve.

Brighton and Hove Cycling UK

- Called for road traffic reduction with a monitored Key Performance Indicators and a car-free city centre, warning that EVs alone are not enough to cut emissions or danger.
- Welcomed current and planned active travel schemes (e.g. Valley Gardens, A23, A259) but stressed the need for a fuller, safer cycle network and better maintenance of road surfaces.
- Concerned Park & Ride will not cut traffic without removal of city centre parking; suggested demand-management measures such as road user charging instead.
- Highlighted land-use planning (15-minute neighbourhoods) and government lobbying (e.g. to ban pavement parking) as key to a low-traffic future.
- Warned against over-prioritising roadbuilding under the new Mayoral Authority; urged focus on sustainable and cycling schemes.

Brighton and Hove Clarion Cycling Club

- Stressed that EVs still produce emissions and risk encouraging driving over walking/cycling.
- Called for citywide 20mph limits, car-free areas (particularly the city centre, North Laine and the Lanes), and a full network of safe, segregated cycle lanes.
- Highlighted the need for wider, clutter-free pavements, more play streets, and street trees to improve safety, accessibility, and attractiveness.
- Suggested Park & Ride will only succeed if linked to reduced city centre parking and repurposed spaces for residents, cycling and public realm improvements.

Brighton and Hove Older Peoples' Council

- Highlighted accessibility and isolation issues; many cannot rely on active travel
- Raised concern about long distances between bus stops, lack of seafront bus service and high parking charge.
- Stressed that reliance on online systems (ticketing, parking permits, bike hire) disadvantages older people.
- Supported healthier lifestyles and clean air but warned about unsafe pavements, shared space and the cost barriers of EVs.

Brighton Buswatch

- Highlighted the importance of bus infrastructure such as red routes, bus lanes and real time information systems.
- Argued bus priority identified as the single most important factor helping bus services.
- Suggested creating a bus priority plan (like LCWIP) and adding priority at all signals.
- Criticised the transport plan for underplaying the role of buses in the city's economy and carbon reduction, compared with walking/cycling.
- Concerned BSIP funding is focused on revenue (subsidies, fares) rather than capital improvements.
- Warned against relying on national averages (Carbon Playbook) which undervalue Brighton's bus network

British Regional Transport Association (BRTA)

- Proposed a series of local and regional rail network improvements, reopening, upgrades and new links.
- Called for more direct bus/rail services to key destinations including the South Downs and more buses on Sundays.
- Proposed concessionary bus passes for under-30s and under-65s to boost ridership.
- Supported retrofitting low-carbon engines to existing bus fleets and further tram/ light rail schemes.
- Called for better accessibility standards, level boarding, kerbs. Autism/ dementia consideration.

Bristol Estate Leaseholders and Tenants Association (BELTA)

- Highlighted accessibility challenges at Bristol Estate, where steep geography and limited bus services restrict residents' access to vital services such as GP surgeries.
- Raised concern about hospital access, stressing the importance of clear routes for emergency vehicles and the need for road design that are logical, consistent and do not unintentionally disadvantage other users.

CPRE Sussex, the countryside charity

- Welcomed active travel and public transport focus but says proposals are insufficiently bold.
- Called for stronger restrictions on private car use including ULEZ, reduced parking, space reallocation.
- Objected to Park and Ride, citing evidence it increases car use and harms countryside/urban fringe.
- Supported neighbourhood hubs and integrated policies that encourage modal shift.
- Highlighted need to protect countryside and green space when planning new schemes.

East Sussex County Council

- Supported initiatives to improve cross-boundary journeys between East Sussex and Brighton and Hove for residents, businesses and visitors, recognising Brighton's visitor economy and the importance of maintaining and enhancing good connectivity by all modes, including bus, rail, active travel and freight.
- Stressed that the movement of goods is as important as the movement of people, welcomed opportunities to work jointly on freight strategy.
- Expressed willingness to collaborate on cross-boundary active travel and public transport corridors, highlighting previous joint schemes such as the A250 bus lanes and Falmer-Woodingdean cycle route.
- Emphasised the need for an inclusive transport network supported by equalities impact assessment (EqIA) and health impact assessment (HIA).
- Supported an increase in public transport trips across the border but cautioned that Park & Ride proposals should not divert users from existing public transport services.
- Requested further details on EV charging delivery, including private sectors involvement, grid capacity and renewable energy integration.

East Sussex Fire and Rescue Service

- Highlighted the plan does not demonstrate a proportionate strategy to cope and protect the increase of cyclists BHCC are promoting and urged considerations of physical controls across the city road networks to safeguard vulnerable road users.
- Expressed willingness to collaborate with the council on managing risks of implementing infrastructure of EV chargepoints including increase in substation capacity, access to these risk areas, noting the importance of a community risk management plan to support a timely emergency response.
- Emphasised the need to educate public access chargepoint users on safe usage to reduce risks
- Highlighted two major risks associated with EV parking in multi-storey car parks – the structural challenge due to heavier EVs (risk of building collapse) and the increased fire hazard as EVs are more volatile and thermal runaway incidents are harder to manage.

ELEVATE research team

- Expressed willingness to submit research evidence including Brighton & Hove resident feedback relevant to the consultation.

- Highlighted findings from the study showing that e-cargo bikes are a realistic and desirable form of mobility option, with the potential to reduce car use and associated emissions.

Historic England

- Supported for solutions and programmes that minimise the impacts of transport on the historic environment, heritage and townscape, delivering long-term environmental benefits.
- Emphasised integration of transport solutions into streetscape and the public realm, particularly in historically sensitive locations such as conservation areas and the setting of listed buildings.

Hove Civic Society

- Raised concerns about “land grab” from larger vehicles, including EVs, and loss of green space through paving drives.
- Proposed tiered parking fees by vehicle size and landscaping one space for each EV charger.
- Called for a better balance of investment in walking/cycling vs cars, including wider pavements in inner areas.
- Suggested greening all new highway works (trees, rain gardens, biodiversity net gain funding).
- Requested explicit recognition of Hove Station Neighbourhood Plan in the transport plan.

Living Streets Brighton and Hove

- Welcomed health and inclusivity aims but says the plan lacks detail on improving walkability.
- Called for a clear strategy to tackle pavement obstructions (bins, guard rails, EV boxes, signage, parking).
- Proposed removing all pedestrian guard railings, citing safety benefits.
- Concerned pavement maintenance receives far less funding than roads, despite new government allocations.
- Called for a new city-wide 20mph speed limit review and stronger enforcement.
- Welcomed proposed walkability and accessibility improvements in the city centre.

Metamorphosis Art Group and The Flamenco and Spanish Group

- Most people cannot afford electric cars, so widespread on-street chargers would be underused, create trip hazards, and should only be installed in purpose-built, out-of-town locations.
- Driverless cars are unlikely to be widely adopted, making investment unnecessary.
- Traffic used to flow more smoothly before 1980s changes (e.g. two-way side roads, no bus contraflow); current road layouts and bus lanes are seen as causing congestion and bottlenecks.
- Successive road planning decisions are viewed as worsening problems instead of addressing underlying issues.
- The council should avoid “vanity projects” and focus on maintaining a clean, reliable, and functional road and transport system.

National Highways

- Concerned about the safety, reliability, and operational efficiency of the Strategic Road Network (SRN), particularly the A27 and A23.
- Emphasised that the plan should reflect and align with DfT Circular 01/2022 – Strategic Road Network and the Delivery of Sustainable Development and the National Planning Policy Framework (NPPF), which set out the Government's policy framework for the SRN and emphasise a vision-led approach to development that reduces traffic impacts by promoting sustainable and active travel and supporting internalised trips in larger developments.
- The Government's Road Investment Strategy (RIS) sets investment priorities for the SRN. RIS2 concluded in March 2025. RIS3 will cover 2026–2031, with an Interim Settlement (2025/26) confirming that the focus will be on maintenance and renewal of the existing network. Not all schemes in the RIS2 pipeline will progress into RIS3.
- Welcomed the plan's promotion of sustainable and active travel to help reduce car dependency and ease pressure on strategic routes such as the A23 and A27.

The Carers Centre for Brighton and Hove

- Emphasised that when targeting accessible, inclusive transport, it is important to include people whose mobility is so limited that they require door-to-door accessibility.

Transport Action Network

- Supports LTP's overall vision but missing a Vision Zero approach to road safety and weak on climate adaptation (shade, SUDS, parking removal).
- Lacks strong demand management to reduce car use; criticism of park & ride for harming buses/rail and the South Downs.
- Too little focus on cycling, e-bikes, and mobility scooters (parking, charging, security).
- Pavement and path maintenance/accessibility issues (widths, kerbs, clutter, seasonal hazards); calls for a review and higher standards.
- Needs better rail improvements (e.g., Moulsecoomb, West Coastway), stronger support for active travel, and caution over autonomous vehicles.

Transport for South East

- Welcomed the strong alignment between the Our City Transport Plan 2035 and TfSE's Transport Strategy and Strategic Investment Plan (SIP), particularly in relation to decarbonisation, inclusion, and sustainable growth.
- Shared a vision for a low-carbon, inclusive and accessible transport system that enhances quality of life and supports sustainable economic growth.
- Adopted consistent approach in planning closely mirrors TfSE's approach to integrated, evidence-based transport planning.
- Appreciated the Plan's explicit recognition of the regional role of the sub-national transport body and the inclusion of the TfSE Transport Strategy and SIP to demonstrate policy alignment.
- Suggested the plan could further align with the SIP by referencing additional regionally significant schemes, such as the A27 East of Lewes–Polegate improvements, the West Coastway Strategic Study, and Brighton Station capacity enhancements.
- Encouraged continued collaboration to ensure Brighton & Hove's proposals remain fully integrated within the wider South East investment framework and contribute to delivering a resilient, inclusive, and net-zero transport system for the region.

University of Brighton

- University of Brighton supports the identified challenges.
- Accessibility at Moulsecoomb station remains a significant barrier for wheelchair users and those with mobility difficulties.
- Challenge 5 (cycling/active travel) is important, and red routes have had a positive impact.
- Cost and convenience are the main barriers to sustainable transport uptake, with more emphasis needed on reducing public transport costs and improving facilities.

Renew Preston Village Campaign

- Renew Preston Village, backed by 1,500 residents, 19 businesses, and community groups, seeks inclusion in the City Transport Plan 2035 to turn Preston Village into a neighbourhood mobility hub.
- The A23 divides the village, leaving it traffic-dominated, unsafe for walking/cycling, flood-prone, and unattractive despite its heritage and role as a city gateway.
- Proposals (8 priorities):

1. **Flood resilience** – Install rain gardens/SUDs to address repeat flooding.
2. **Crossings** – Safer east–west toucan crossings and north–south raised junctions.
3. **Active travel hub** – Cycle lanes, wider pavements, bike hire, bus stops, and rail links.
4. **Air & noise reduction** – Trees, landscaping, narrower carriageways for calmer traffic.
5. **Economic growth** – Support shops, attract investment, connect heritage and events.
6. **Public realm** – Heritage-sensitive upgrades with greenery to improve pride and safety.
7. **Community cohesion** – Create welcoming, people-centred communal space.
8. **Events infrastructure** – Improve capacity for major Preston Park events and capture local spend.

About you

Q How are you responding to this survey?

Many of the respondents were residents, 10% work or study here, 6% represented a business or organisation, 3% reported as a visitor and 2% were an owner of a business.

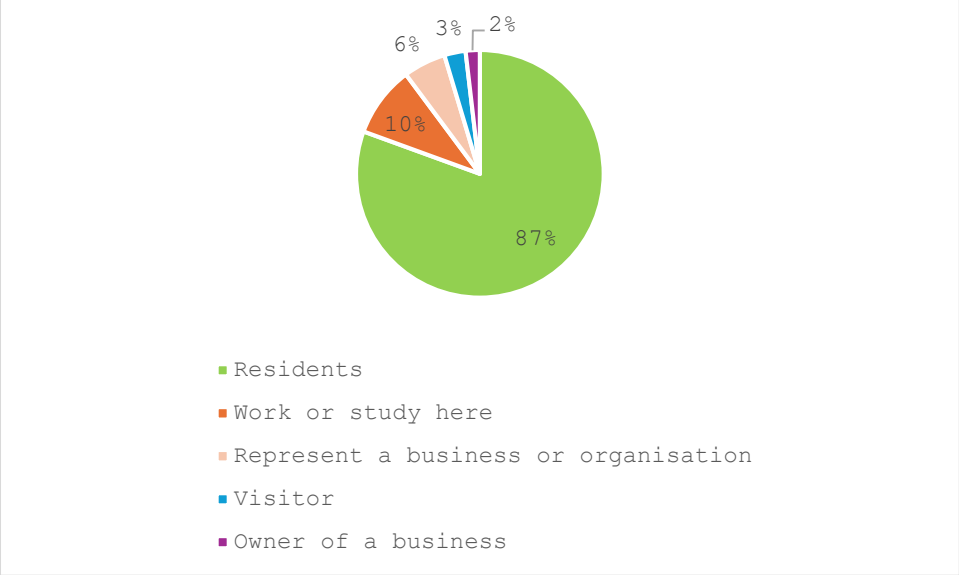

Figure 5: Results of question: How are you responding to this survey?

Q How did you hear about this consultation?

Nearly one-third of respondents heard about this consultation through social media. Around 10% heard by word of mouth. Smaller proportions heard through the council website, email or selected 'other'. Six percent heard through local press, 4% from an information leaflet and 2% because they attended an event.

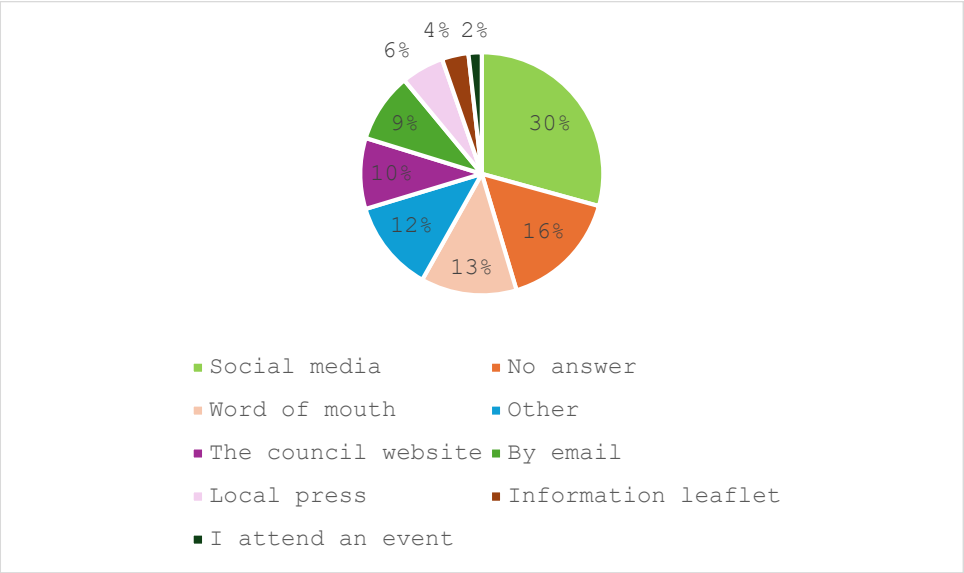

Figure 6: Results of question: How did you hear about this consultation?

Postcode map

Respondents were invited to provide postcode on an optional basis. These postcodes were categorised by areas and the number of responses in each area was recorded and illustrated indicatively in **Error! Reference source not found.**. A small number of postcodes fell outside the map area, which are likely to have be provided by visitors.

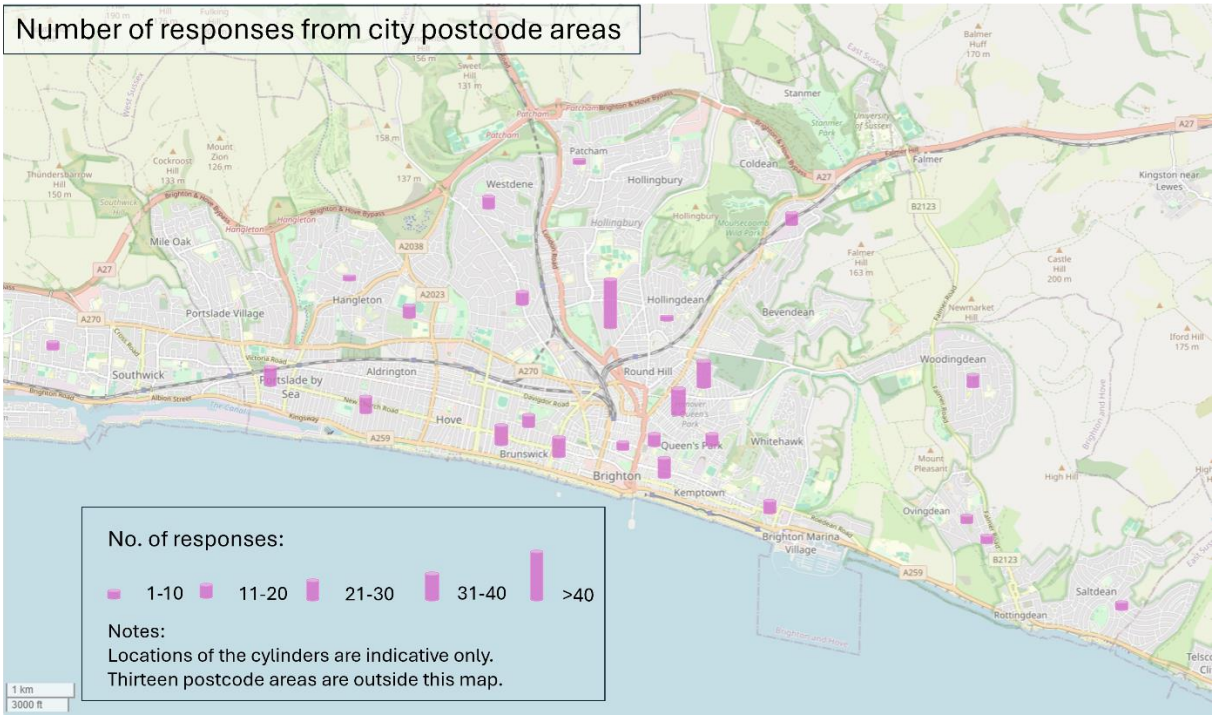

Figure 7: Postcode map

Equalities information

Q What gender are you?

Around one-third of respondents identified as female and one-third as male, while 5% identified as non-binary and 1% selected ‘other’.

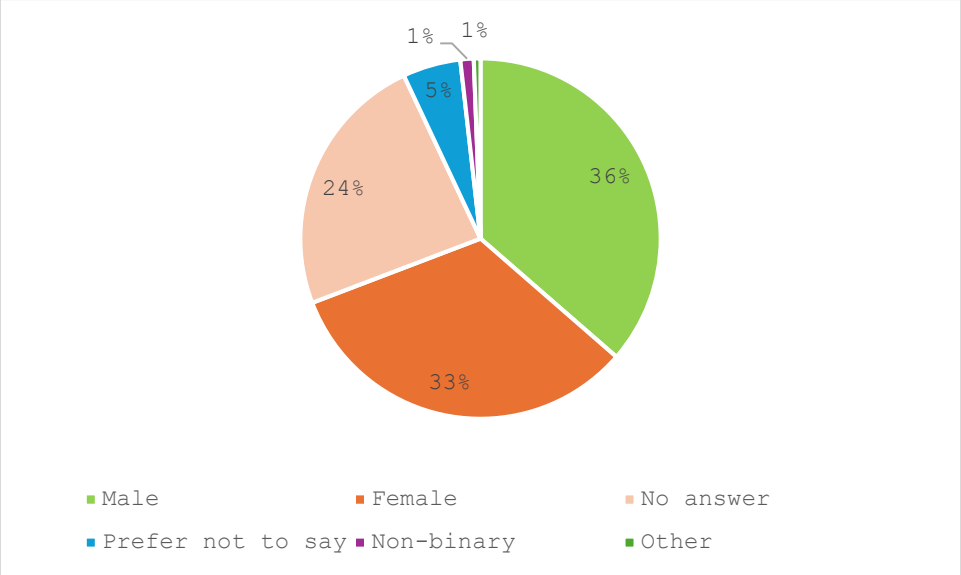

Figure 8: Results of question: What gender are you?

Q Do you identify as the sex you were assigned at birth?

Sixty-nine percent of the respondents identified with the sex they were assigned at birth, while 1% did not.

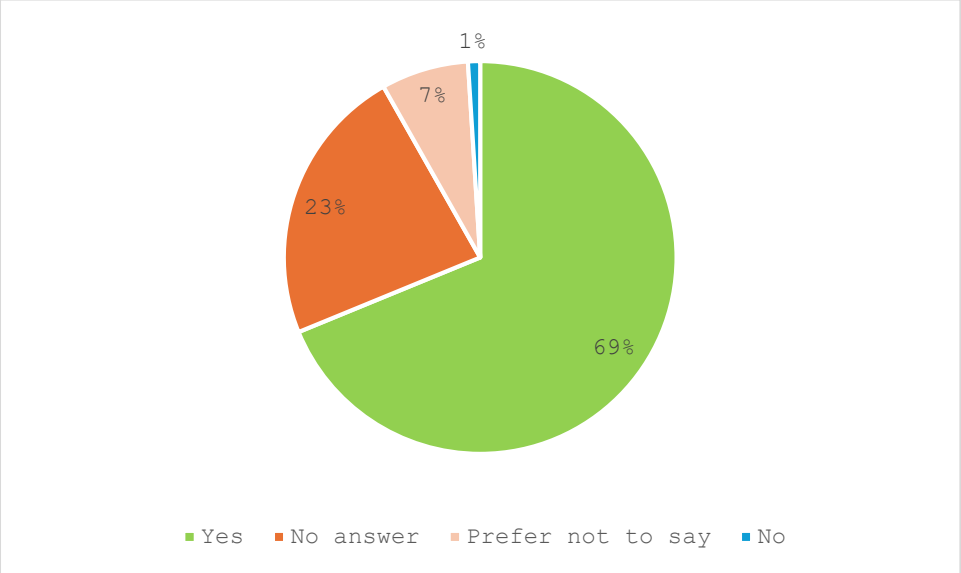

Figure 9: Results of question: Do you identify as the sex you were assigned at birth?

Q What is your age?

The age of respondents is broadly evenly distributed between 35 and 65+ ranging from 15%-17%. Younger adults were less represented with 9% aged 25-34 and only 3% aged 18-24.

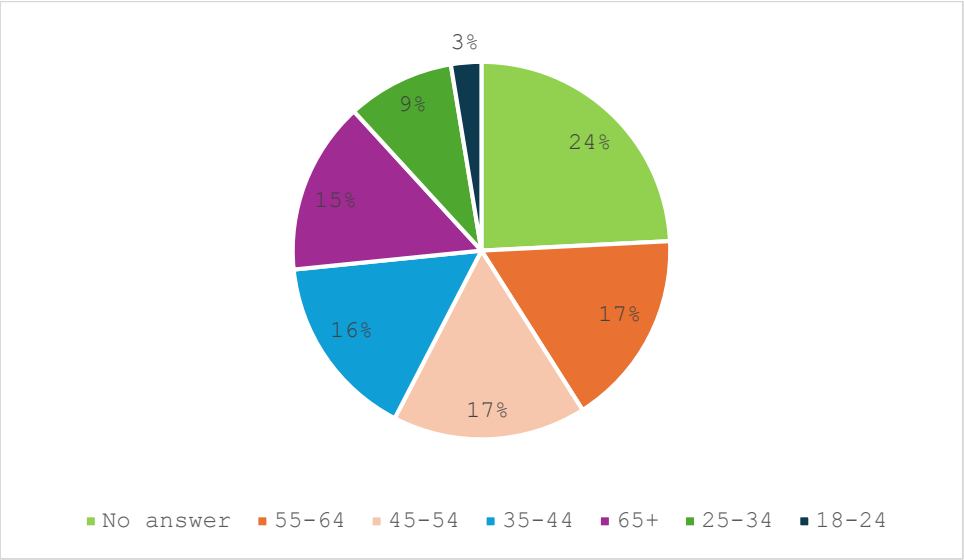

Figure 10: Results of question: What is your age?

Q What is your ethnic group?

Around 64% of respondents are white. Ethnic groups other than white are less represented with a total of around 5%.

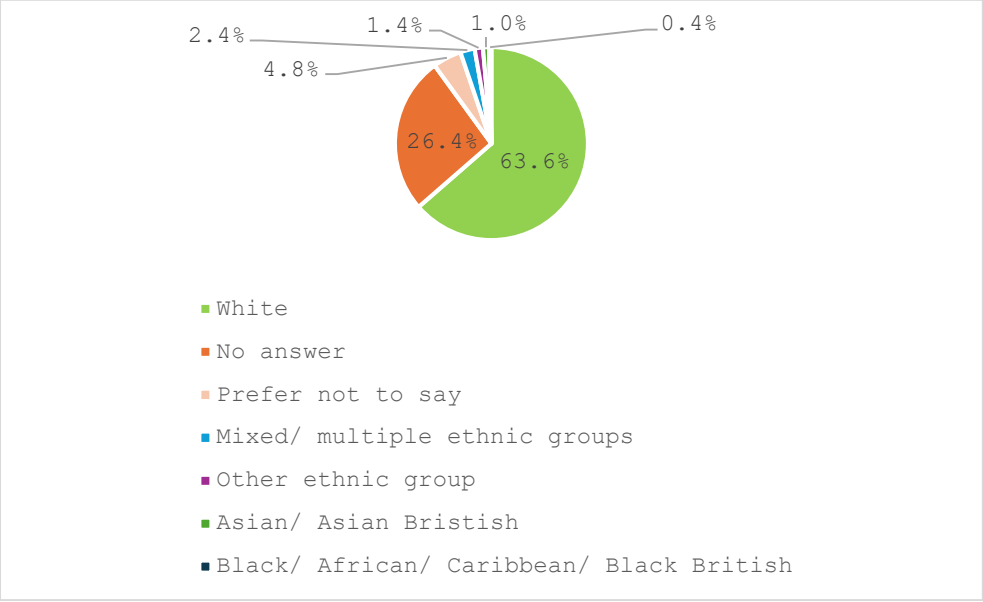

Figure 11: Results of question: What is your ethnic group?

Q Do you have a health problem or disability?

There are 17% of respondents have a lot or a little health problem or disability.

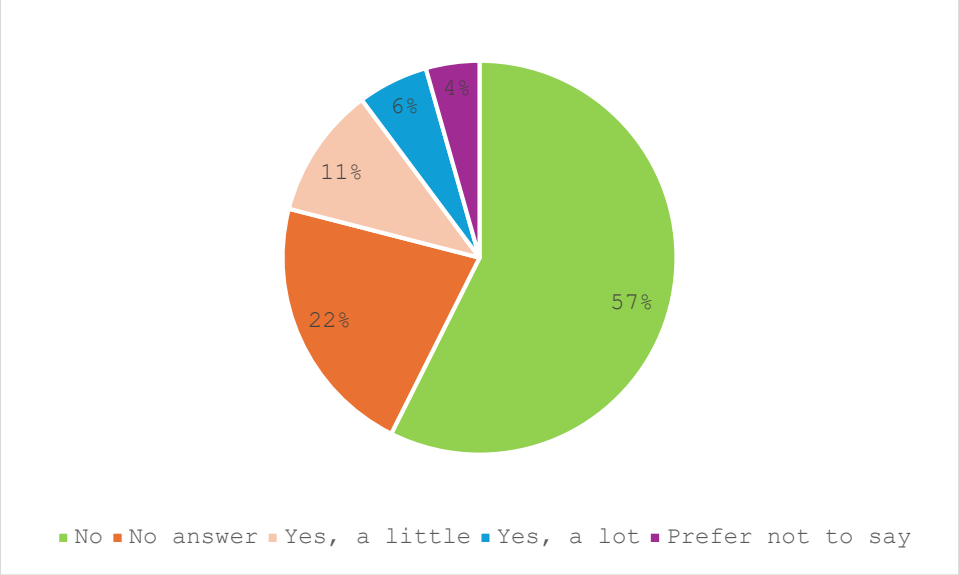

Figure 12: Results of question: Do you have a health problem or disability?

Q Your condition(s)

Among whom responded ‘Yes, a lot’ and ‘Yes, a little’ to the health condition question, they were asked to tell their condition. They could select more than one impairment that apply to them.

Two-thirds of the respondents reported having a physical impairment, one-third reported a long-standing illness, one-quarter reported a mental health condition, 17% were on autistic spectrum and 10% reported a sensory impairment. In addition, 6% reported having a developmental condition and 6% a learning disability/ difficulty.

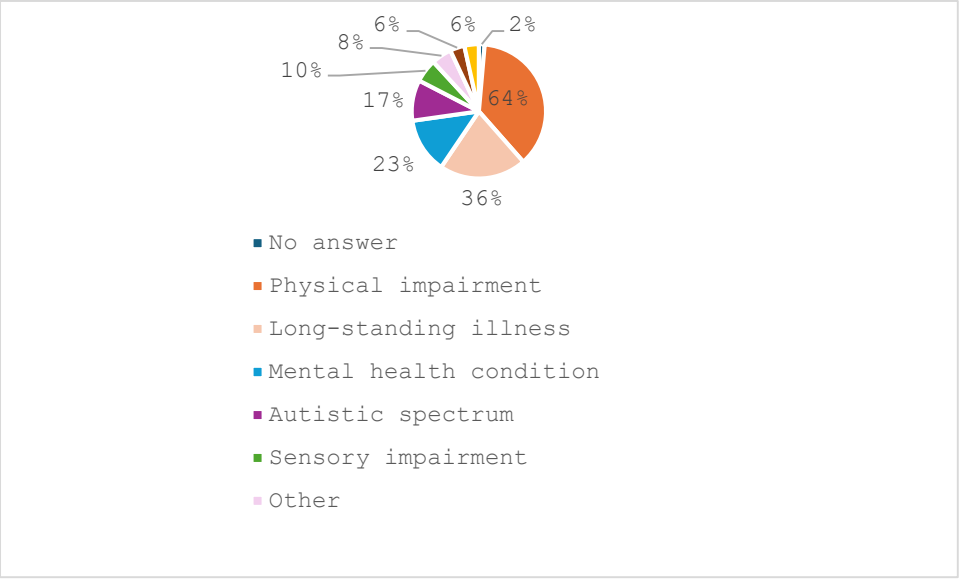

Figure 13: Results of question: Your condition(s)

4 Public exhibition feedback

4.1 Summary

A public exhibition was in place at the Foyer Gallery in Jubilee Library for a week between 30 June and 6 July 2025. Members of the public were able to view information about the consultation, take information away and leave comments, in response to three key questions, by sticking post-it notes on the wall of the exhibition. Figure 14 shows the exhibition with a close up of the ‘Have your say’ wall.

Figure 14: Public exhibition in the Foyer Gallery at Jubilee Library with the ‘Have your Say’ wall

During the exhibition week, a drop-in session was held at Jubilee Library to engage people in conversation about the consultation. For those unable to stop and talk, officers handed out postcards inviting people to go online to have their say (around 100 were distributed during the 2-hour session).

4.2 Feedback on the 'Have your say' wall

Comments from the exhibition were based around three key questions. Responses have been sorted into themes which are summarised below.

Question 1 – How do you usually travel around the city, and what works well (or not so well) about it?

Mode of transport for getting around the city	Number of times mentioned
Walking	11
Cycling	6
Taking buses	13
Driving	2

Table 4: Results of Question 1

Themes	Comments	Number of comments
Walking	Walking is good exercise and reliable	2
	Narrow pavements	1
	Unsafe walking environment	1
	Too hot to walk in summer	1
	Satisfied with green scenery	1
	Car free city centre	1
	Total	**7**
Cycling	Cycling areas in Valley Gardens and Preston Park much improved	2
	Gaps in the cycling routes and bad design are making cycling dangerous	2
	Greater awareness from pedestrians to stay out of the cycle lanes is needed	2
	More cycle lanes needed especially to link to the seafront	2
	The behaviour of car divers makes cycling dangerous	1
	Cycling should be a priority in our transport plan as it is healthy	1
	Total	**10**
Bus	Satisfied with bus services – lots of bus routes, comfortable, Wi-Fi, frequent, nice bus drivers	5
	Cheaper bus services	2
	Dissatisfied with bus services - cleanliness, crowded	2
	No air conditioning on buses	2
	Too many buses through city centre and long waiting times	2
	Make window open on Big Lemon	1
	More digital timetable boards on more bus stops as not all people have a phone	1
	Total	**15**

Themes	Comments	Number of comments
Congestion	Busy roads - congestion at Churchill Square, North Road, London Road	2
	Congestion zone in city centre (perks if car share)	1
	Total	**3**
Enforcement	Vans not abiding by double red lines on Lewes Road	1
	Total	**1**
Roads and pavements	Some roads and cycle lanes are very bumpy	1
	Total	**1**
Other public transport	Call for tram	1
	Total	**1**

Table 5: Respondents' comments for Question 1 by themes

Question 2 – Are there any changes that would make your daily journeys easier or better?

Themes	Comments	Number of times mentioned
Walking	More sitting areas for longer walking journeys	2
	More safe crossings	1
	Wider pavements	1
	Dropped kerbs at crossings	1
	Total	**5**
Cycling	More protected cycle lanes	2
	Car drivers to respect cyclists	2
	Better and more joined up cycle network	2
	More safe bike parking	1
	Public subsidy of Beryl Bike scheme	1
	Total	**8**
Bus	Cheaper bus services	3
	More frequent and reliable buses	2
	Air conditioning on buses	1
	Training for bus drivers on understanding deaf community	1
	Satisfied with bus services and drivers	1
	Accessibility seating at bus stops	1
	Free for students for bus services	1
	Total	**10**
Enforcement	Speed cameras on residential roads	1
	Total	**1**
Restriction	More car free areas - e.g. only public transport on North Road	1
	Total	**1**

Table 6: Respondents' comments for Question 2 by themes

Question 3 – If you could improve one thing about transport in your area, what would it be?

Themes	Comments	Number of times mentioned
Cycling	Better and more joined up cycle network	2
	More safe cycle parking	1
	Total	**3**
Bus	More direct routes	1
	Better inclusivity including inclusive drivers	1
	Working electronic timetables	1
	Cheaper bus services	2
	More zero emission buses	1
	Total	**6**
Congestion	Congestion charge during weekends and summer	1
	Total	**1**
Enforcement	Speed bumps or cameras on residential roads	2
	Total	**2**
Other public transport	Call for tram	1
	Total	**1**
Integrated transport system	Support for Park & Ride	1
	Total	**1**

Table 7: Respondents' comments for Question 3 by themes

4.3 Feedback received in drop-in sessions

Some residents attended the drop-in sessions and talked about their feedback on the city's transport. Table 8 summarises their feedback and suggestions.

Themes	Comments
Cycling	More protected cycle lanes to encourage cycling.
	Link up the cycle network – current gaps discourage use.
Public transport	Timetables: buses on same route often arrive together, reducing efficiency.
	Western Road/ North Street: suggested spreading bus stops to other roads to reduce bottlenecks.
	Direct connections: Rottingdean ↔ Universities (Falmer) needed via Falmer Road.
	Saltdean issues: - Low usage and frequency (routes 27, 47). - Roadworks and parked vehicles disrupt service.
	General Suggestions: - Smaller buses during low-demand periods. - Circular routes linking neighbourhoods to main corridors. - App-based demand-responsive transport to improve connectivity.
Congestion	Concerns from A259 Action Group about congestion.

Themes	Comments
	A259 traffic congestion causes delays and poor air quality.
	A259/High Street junction, Rottingdean: tight turning radius for buses, forcing them into adjacent lanes.
	Suggestion: optimise traffic signals (e.g. with SCOOT) to improve flow and reduce idling emissions.
Parking	Insufficient disabled parking
	Safety concern: disabled parking adjacent to cycle lanes – unsafe when opening doors as cyclists don't slow down.
Enforcement	Speeding on 20mph roads, but no enforcement.
Environment	Suggestion: biogas-powered vehicles as an alternative to electric vehicles:
	- Lower-cost conversions of existing fuel buses.
	- EVs criticised for high production and end-of-life carbon footprint.
	Develop a streetscape design code for transport projects and maintenance to improve quality of the public realm.

Note that they are all one-off comments.

Table 8: Feedback from residents

5 Workshop/ meeting feedback

5.1 Summary

Five workshops were held in five schools listed below and also in Annex 1 – List of events, workshops and poster distribution in June 2025. These took place before the public consultation started to better match with school schedules to avoid exams and before their end of term. In total, 71 students from years 7 to 10 were engaged. In the workshops, they were asked if they feel safe to getting around Brighton alone, and to vote for the greatest challenge they think the city faces and the objective they think is the most important. There were discussion sessions for them to raise questions and reflect their concerns and needs. The workshops took place at:

- Cardinal Newman Catholic School
- Brighton Aldridge Community Academy (BACA)
- Portslade Aldridge Community Academy (PACA)
- Longhill High School
- Dorothy Stringer School

These five schools were chosen because of their catchment areas: Cardinal Newman is a large faith school with a wide catchment; BACA is located to the north of the city, PACA to the west, Longhill to the east and Dorothy Stringer is relatively close to the city centre. Together, students from these schools were able to provide feedback that reflected concerns and needs from across different parts of the city.

5.2 Feedback

Most students felt safe to get around the city alone, but they also mentioned it would depend on areas and time of the day. For examples, they felt less safe getting around in the city centre, London Road and when it is dark.

The greatest challenge they thought the city faces is Challenge 1: Enabling people to live safer, healthier and more active lives and the most important objective went to Objective 3: deliver a safe, inclusive and integrated transport system.

Feedback from these school workshops is also presented by themes in Table 9. Where pupils have made suggestions as to how things could be improved, we have included these within the table.

Themes	Comments	Number of times mentioned
Walking & Cycling	Lack of safety for cyclists due to traffic	8
	Unsafe walking conditions – lack of lighting or poor road visibility	8
	Pavements too narrow and crowded	4
	Cycle lanes too close to roads	2
	Calls for better active travel choices and public spaces	2
	Feels unsafe crossing the road	2
	Total	**23**
	Suggested improvements:	
	Safer cycling infrastructure - better marked and separated cycle lanes	5
	Encourage people to walk or cycle for short trips to reduce traffic on roads	2
	More secure bike storage and cheaper rental bikes	1
	Prioritise pedestrians and cyclists	1
	Total	**9**
Public transport	Bus frequency & reliability - not matching school timetables, long waits, delays, buses not turning up	23
	Affordability of fares - too expensive for regular use	20
	Passenger safety and behaviour on buses - unsafe or uncomfortable environments	8
	Accessibility - difficult for older people, children, and disabled passengers	5
	Needing multiple buses to reach destinations	3
	Bus driver behaviour - rudeness, inconsistent fare charges	3
	Crowded buses or trains	3
	Tree branches brushing buses	2
	Total	**67**
	Suggested improvements:	

Themes	Comments	Number of times mentioned
	Free or cheaper bus fares or expanding free bus ID eligibility	5
	Increased frequency and route variety	3
	Improve safety and atmosphere on buses	3
	Better real-time tracking/ more real-time information screens needed	3
	Total	**13**
Congestion	Congestion	11
	Narrow two-way roads increasing congestion	1
	Road works impacting journey times	1
	Total	**13**
Roads and pavements	Poor road surface is a major problem - potholes	27
	Uneven pavements	4
	Total	**31**
Electric vehicles	Insufficient EV charge points, especially for those without driveways	1
	Confusion about how e-bikes work	1
	Total	**2**
Technology	Support for smart technology to improve transport planning and operations	7
	Total	**7**
Parking	Expensive parking costs	8
	More car parking in busy places, e.g. London Road	1
	Total	**9**
Inclusivity and accessibility	Support transport to be inclusive and accessible for all	13
	Total	**13**
Environment	Concern about CO□ emissions and environmental impact	7
	Total	**7**

Table 9 Students' feedback by themes

Additionally, officers attended six meetings during the consultation to give an overview of the Our City Transport Plan 2035 and collect feedback from the stakeholders including disabled people from Possibility People - GIG. Full details of meetings attended and focus groups held are detailed in Annex 1 – List of events, workshops and poster distribution.

Feedback from these meetings is presented by themes in Table 10.

Themes	Groups	Comments
Walking	Transport Partnership	Make good use of public rights of way network
	Destination Experience Group	Better city centre walkability as there are too many cars

Themes	Groups	Comments
	Local Access Forum	Street clutter including pavement parking, signage, recycling bins, and EV chargepoints was highlighted as a major barrier for pedestrians, especially those with buggies or wheelchairs.
		Pavement parking enforcement is key to ensuring safe and accessible pedestrian spaces.
	Possibility People - GIG	Wider pavement by narrowing streets for better accessibility for disabled people.
	Healthy Weight Programme Board	Looking to get people out to the South Downs, etc to enjoy the countryside and all its benefits.
Cycling	Local Access Forum	The cycle hanger scheme is popular, but waiting times are long, indicating strong demand.
		More safe, well-located, and well-lit cycle parking is needed, ideally with CCTV, especially important for women and others concerned about safety.
		Criticised capital allocated for delivering Public Right of Way Improvement Plan which is seen as insufficient.
	Possibility People - GIG	People with sight loss feel unsafe at around floating bus stops and unclear cycle lanes.
		At Preston Park, cyclists do not stop at zebra crossings, posing risks to pedestrians.
		Dotted crossings unsafe for people with learning difficulties.
		Suggestions: add clearer markings or dedicated crossings for cycle lanes, and better education for cyclists and stricter use of cycle lanes.
Public transport	Transport Partnership	Priority for buses
	Destination Experience Group	The focus needs to be on getting around the city by public transport, bus and train as Brighton is too hilly for cycling.
	Local Access Forum	Bus frequency and affordability were highlighted as priorities.
		Higher bus fare and lower parking fees in the city discourage shift to public transport.
	Possibility People - GIG	Long gaps between bus stops are challenging, especially in areas like between Norfolk Square and Waitrose, or from The Pavilion to St Peter's Church.
		Lack of a stop at Clarence Square.
		Newer buses may not accommodate all wheelchair sizes, and drivers often don't wait at the raised parts of stops.

Themes	Groups	Comments
		Issues with real-time tracking for certain services (e.g. Compass buses in Patcham) makes journey planning difficult.
Congestion	Transport Partnership	Road traffic reduction
	Destination Experience Group	Gridlock in the city centre, especially during events. Call for a strategic plan to get rid of cars, so people would get on buses or active travel.
		Suggestion: better use of wayfinding and digital messaging/ intelligence to improve traffic flow.
	Local Access Forum	Eastern section of the A259 was missing from the plan. Call for improvement on traffic congestion.
Roads and pavements	Possibility People - GIG	Street clutter (like cycle parking or café/restaurants furniture) create barriers for those with visual impairments who rely on a kerb or building lines to navigate.
		Uneven surfaces, steep cambers (e.g. Gardner Street), and potholes on pavements are dangerous for wheelchair users. It also requires expensive maintenance of chair outside of the usual cycle regularly
		Wheelchair users end up in the road owing to pavement congestion on some streets such and Ship Street.
		The incline at Eye Hospital makes access difficult for the mobility impaired, though benefitting the visually impaired.
Electric vehicles	Local Access Forum	Electric vehicles still produce emissions from tyre and brake wear.
Parking	Local Access Forum	Consider parking charges based on vehicle weight to discourage excessive car use.
	Possibility People - GIG	Require accessible parking spaces near GP, workplaces or shops, so they can be able to work and live independently. End of twinning blue badges with yellow lines and red routes created issues for people who are disabled car users.
Restriction	Possibility People - GIG Action Group	Wheelchair users reported taxi drivers avoiding pickups due to their perception it is difficult to stop or turnaround on red routes.
Shared space	Possibility People - GIG	Shared spaces rely too much on social understanding; some users (cyclists, e-scooter riders) don't yield to pedestrians.
		Large delivery vehicles at Middle Street make it uncomfortable for pedestrians to share space.
Our City Transport Plan 2035 document	Transport Partnership	Traffic includes non-motorised vehicles eg cycles and also pedestrians.
	Possibility People - GIG Action Group	The plan seems to prioritise cycling.

Themes	Groups	Comments
	Local Access Forum	Members believed tackling challenge 1 could help address several of the other challenges too.
		Challenge 1 deserves more detailed coverage within the plan.
		Walking should be considered part of the overall traffic flow.
		The plan is still too focused on vehicles.
		Referenced Gear Change: a bold version for cycling and walking, the national strategy for walking and cycling. Urged the council to adopt a similarly bold approach.
		While all six objectives were supported, attendees recognised that delivery depends heavily on funding. They hoped that more of the plan could be implemented beyond statutory duties.
Valley Gardens	Destination Experience Group	Valley Gardens is great. The council needs to ensure it is maintained and remains a welcoming space.
		Valley Gardens focuses too heavily on cyclists.
City gateways and connectivity	Destination Experience Group	Improve access into the city for visitors – both public and private transport.
		Support for a good quality P&R facility which would be good for visitor economy.
		Improve gateways to the city both visually and in terms of functionally with gateways working as smooth transition points into the city. For example, coach and train station.
		Better east-west connectivity.
Environment	Local Access Forum	Attendees also raised concerns about the growing number of large SUVs, which take up more space and create more emissions.
Other	Possibility People - GIG	Conditions of the roads for blind and partially sighted people, flat surfaces useful for mobility needs are difficult for people with vision impairments owing to use of lips and raised curbs to navigate.
		Concerns over a lack of learning from previous projects, like Elder Place, where accessible planning was not fully considered.
		Inconsistent standards across council departments when it comes to accessibility.
		Consultation processes are often inaccessible, lack of notice and insufficient work done to survey opinions from people with learning difficulties — Your Voice surveys are not enough, and more time and better formats are needed.

Note: no comments were received from the Taxi Forum for this consultation

Table 10: Stakeholder meetings' feedback by groups and themes

5.3 Survey results from respondents with health issues

83 respondents reported that their day-to-day activities are limited by a health problem or disability lasting, or expected to last, at least 12 months. Their responses were extracted for analysis to compare with the overall results in Section 4.2.

Travel habits

Q What mode of travel do you mostly use different types of trips?

- Commuting to work: 46% said not applicable. Among the rest, 18% use car, 12% use train, 8% walk, 8% use bus and 5% cycle.
- Education: 79% said not applicable. Of the remainder, 8% walk, around 5% use car, 3% cycle; and 2% travel by bus and train each.
- Shopping: 30% use bus, 28% walk, 25% travel by car and 10% cycle.
- Leisure: Walking is 30%, but more respondents cycle (17%), while bus and car use are 23% and 20% respectively.
- Visit the city: Walking and taking bus are similar to shopping trips, 13% use car and 12% cycle.
- Other modes (Taxi or private hire vehicle, mobility scooter or wheelchair): each account for around 1%-3% across all trip purposes with no one takes taxi or private hire vehicle to school and shopping and no one uses motorbike or moped for all trip purposes.

Compared with the results from Section 4.2, there are slightly higher proportion of respondents reported they are not studying or working. In general, they use more car. Proportion who walk for education and visiting the city is similar as well as cycling for visiting the city.

Transport challenges

Q Do you agree or disagree that these 5 challenges are what we should focus our resources on tackling?

Figure 15**Error! Reference source not found.** shows the percentage of respondents who selected ‘strongly agree’ or ‘agree’ with the identified transport challenges. Similar to the results in Section 4.2, at least 70% of respondents expressed agreement across all key challenges, but the ranking of the challenges is different. Challenge 4 instead of Challenge 1 received the strongest support with around 84% of respondents in agreement. Challenge 2 instead of Challenge 3 received the least support.

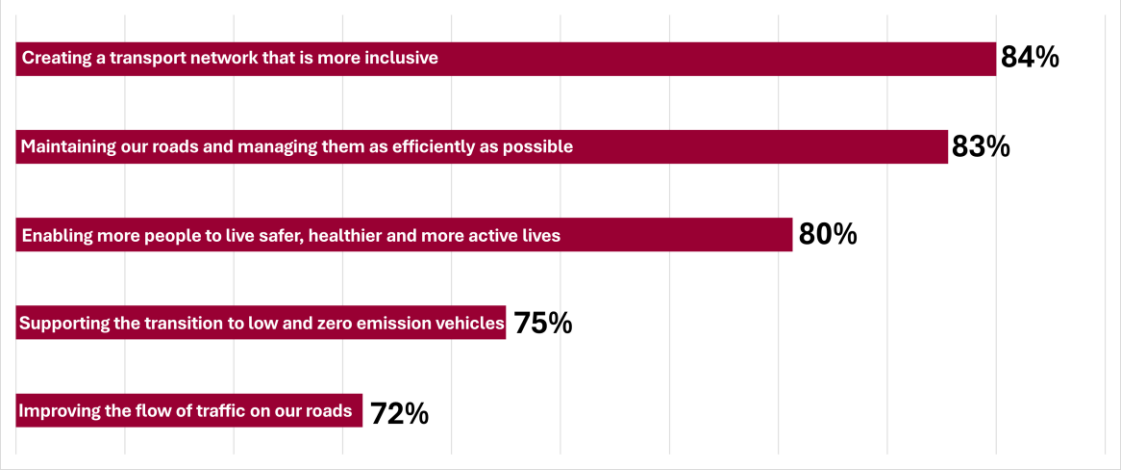

Figure 15: Percentage of respondents who selected 'strongly agree' or 'agree' with the identified transport challenges

Transport objectives

Q Do you agree or disagree that these objectives will address the challenges facing the city?

Figure 16Figure 16 shows the percentage of respondents who selected 'strongly agree' or 'agree' with the proposed objectives. The results are broadly consistent in term of ranking to those in Section 4.2, with over half of the respondents expressed agreement across Objective 1 to 5. Objective 4 received the strong support with around 78% of respondents in agreement while Objective 6 received the least support with 47% of respondents in agreement and around 26% of respondents expressed neither agree or disagree. The only different in ranking compared with Section 4.2 is between Objective 1 and 3: here, Objective 3 is ranked third and Objective 1 is ranked fourth, whereas their positions were reversed in Section 4.2.

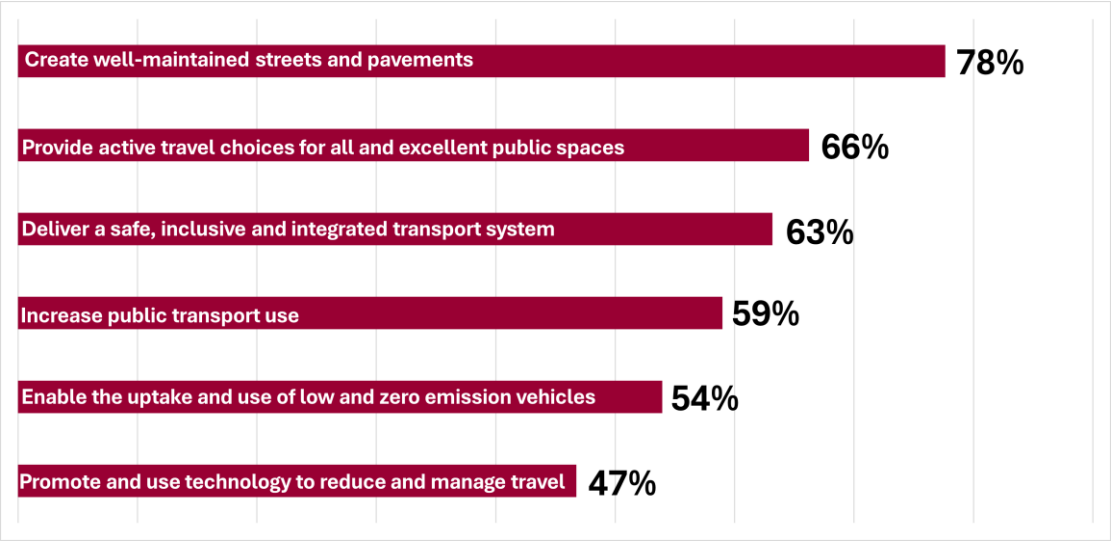

Figure 16: Percentage of respondents who selected 'strongly agree' or 'agree' with the proposed objectives

Project types

Q Please rank the project types below in order of importance to you.

The ranking of the seven project types is presented below. Similar to the results in Section 4.2, *Subsiding public transport to make it more affordable* receiving the strongest support while *Installing electric vehicle chargepoints* receiving the least support. The ranking between 2 and 5 are slightly different from those in Section 4.2.

		Average Score
1.	**Subsidising public transport to make it more affordable**	3.0
2.	**Maintenance of our roads and pavements**	3.4
3.	**Supporting and encouraging residents, visitors and businesses to use public transport and active travel**	3.9
4.	**Improving the accessibility of our streets**	4.0
5.	**Improving safety with new crossings for pedestrians, targeted improvements at junctions and outside schools**	4.1
6.	**Providing local transport hubs where a range of transport modes can be accessed**	4.3
7.	**Installing electric vehicle chargepoints**	5.4

Table 11: Ranking of project types

The average scores range from 3.0 to 5.4 which is relatively wide, suggesting that respondents expressed strong differences in their priorities across the project types.

Major schemes

Q Please rank the below major schemes in order of importance to you.

Similar to project types, the ranking of the six major schemes with the average score shown alongside each type.

		Average Score
1.	**Improving the look and feel of the city centre to make it more pedestrian friendly**	3.1
2.	**Improving bus journeys times in the city through bus lanes and red routes**	3.3
3.	**Improving priority routes for active travel (walking, wheeling and cycling)**	3.3

4.	**Sussex Coast Mass Rapid Transit – an express bus or tram that provides quicker connections between Brighton & Hove and other nearby coastal towns**	3.7
5.	**Improving to access the city centre**	3.8
6.	**New transport hubs at the city's edge offering Park & Ride, EV charging, vehicle hire and help reduce city truck traffic**	3.8

Table 12: Ranking of major schemes

Among the six major schemes, Improving the look and feel of the city centre to make it more pedestrian friendly received the strongest support instead of Improving priority routes for active travel (walking, wheeling and cycling) compared with Section 4.2. Again, new transport hubs at the city's edge offering Park & Ride, EV charging, vehicle hire and help reduce city truck traffic received the lease support.

Compare with the average scores of project types, the variation in the scores of major schemes is smaller ranging from 3.1 to 3.8, indicating that respondents viewed all six major schemes as having relatively similar importance.

From the above results, respondents with health issues broadly shared the same views as those in Section 4.2. The slight differences are that they placed higher priority on creating a more inclusive transport system and making the city centre more pedestrian friendly.

Written responses

Some of the comments from disabled people reflected the same views as the wider public, such as concerns about the affordability of public transport, traffic congestion, the need to reduce vehicle numbers, calls for Park & Ride and a more reliable public transport system (e.g. trams), high parking costs, the need for more buses and routes, and greater provision for pedestrianisation and safer cycle networks.

Specific concerns were raised about insufficient disabled access and parking, with some noting that additional double yellow lines and red routes make the city less accessible. Some felt very strongly that for certain groups, such as disabled people, tradespeople and social workers, active travel and public transport are not accessible for everyone. Some also highlighted barriers related to digital exclusion, noting that not everyone has a phone or the skills to use one, which makes parking or accessing other transport options more difficult.

5.4 Youth survey results

Apart from the school workshops held to engage with young people, a youth survey was also created and carried out using 'Your Voice' for gathering feedback from those aged 10 to 18. This survey was promoted during the workshops and distributed more widely through emails to schools across the city. A few schools also

supported by featuring the survey in their newsletters. 29 responses were received in Your Voice.

Travel habits

Respondents were asked about their travel habits before moving onto questions specific to the transport plan.

Q Tell us how happy or unhappy you feel about traveling on your own without an adult.

- Walk: 0% said not applicable. 77% of the respondents selected ‘Very happy’ and ‘Happy’.
- Bus: 14% said not applicable. Of the remainder, 50% selected ‘Very happy’ and ‘Happy’, 21% said ‘OK’ and 15% reported they were ‘Unhappy’ and ‘Very unhappy’ taking bus on their own.
- Cycle: 44% said not applicable. Among the rest, 32% were ‘Very happy’ and ‘Happy’, 8% said ‘OK’ and 16% were ‘Unhappy’.
- Scooter: Two-thirds said not applicable. No one was ‘Very happy’, 17% selected ‘Happy’, 8% were ‘OK’ and another 8% were ‘Unhappy’.
- Train: 40% said not applicable. 32% selected ‘Very happy’ and ‘Happy’, 8% were ‘OK’, 4% reported ‘Unhappy’ and 16% said ‘Very happy’.
- Other (e.g. as a passenger in vehicles): Two-thirds said not applicable. 11% reported ‘Very happy’ and ‘Happy’, 17% were ‘OK’ and 6% selected ‘Very unhappy’.

Overall, respondents predominantly use sustainable modes of transport such as walking, cycling, buses and trains when travelling on their own with walking be the happiest way. It is noted that 15% -20% of the respondents felt unhappy or very unhappy when cycling, taking bus or train. According to their feedback in the later sections, the main reasons are likely to be long travel times to schools caused by incompatible bus and school timetables as well as expensive bus fares.

	1 - I don't travel this way	2 - Very happy	3 - Happy	4 - Ok	5 - Unhappy	6 - Very unhappy
Walk	0%	26.92%	50%	15.38%	7.69%	0%
Bus	14.29%	25%	25%	21.43%	3.57%	10.71%
Cycle	44%	16%	16%	8%	16%	0%
Scooter	66.67%	0%	16.67%	8.33%	8.33%	0%
Train	40%	20%	12%	8%	4%	16%
Other	66.67%	5.56%	5.56%	16.67%	0%	5.56%

Figure 17: Satisfaction of respondents to use different mode of travel

Transport challenges

Respondents were asked to indicate their level of agreement with the key transport challenges using a four-point scale: agree, not sure, disagree and no answer. They were invited to provide their thoughts on each challenge.

Q Do you agree or disagree that we should help people be healthier and have picked the best way to do it?

Nearly 80% agreed that the council should help people be healthier, 14% reported they were not sure, 3% disagreed and 3% had no answer.

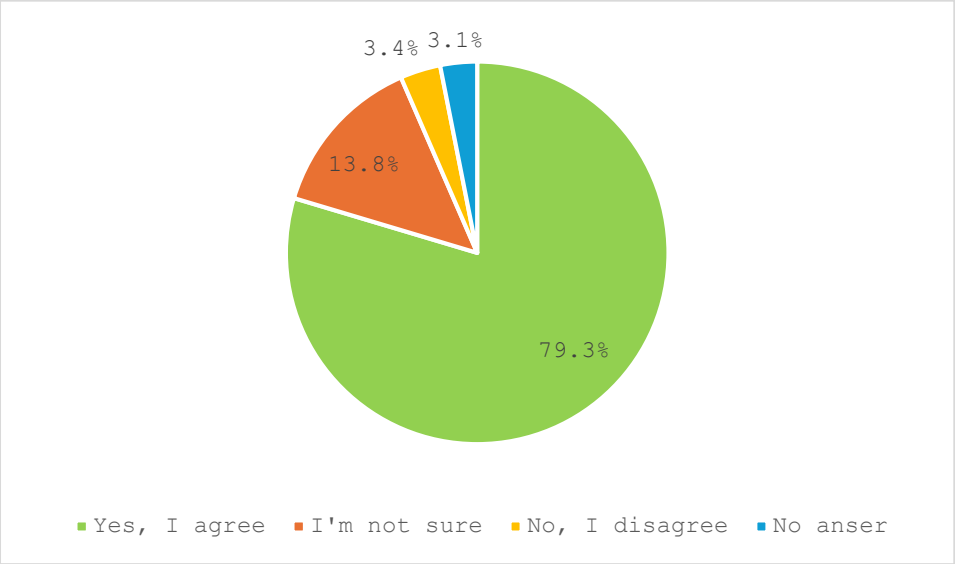

Figure 18: Results of question: Do you agree or disagree that we should help people be healthier and have picked the best way to do it?

Comments	No. of times raised
Walking and cycling	
Unsafe cycle network, particularly near schools and parks	2
Make walking and cycling safer	1
Total	**3**
Public transport	
Long travel times to schools	2
Insufficient public transport, especially buses during school hours	2
Expensive bus fares	1
Total	**5**
Environment	
Suggested to improve environment by planting more trees and enhance scenery to make journeys more pleasant and potentially reduce congestion	1
Total	**1**
Council policy	
Reported the new secondary school admissions policy could lead to students travel longer journeys to schools	1
Most young people only move if there is an incentive	1
Total	**2**

Table 13: Respondents' comments for by themes

Q Do you agree or disagree that we should focus on improving journeys for buses and bicycles and have picked the best way to do it?

Nearly 60% agreed that the council should focus on improving journeys for buses and bicycles, 21% reported they were not sure, 17% disagreed and 3% had no answer.

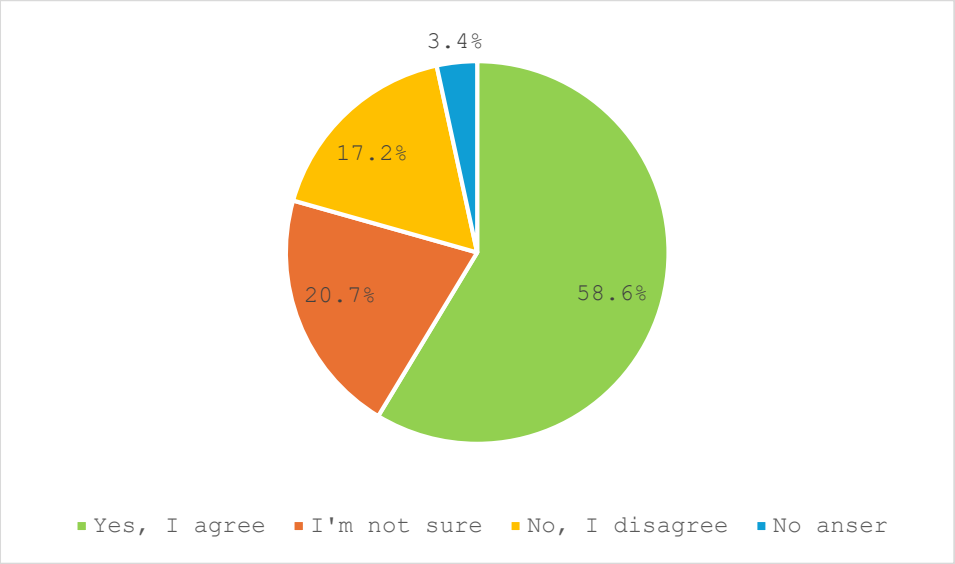

Figure 19: Results of question: Do you agree or disagree that we should focus on improving journeys for buses and bicycles and have picked the best way to do it?

Comments	No. of times raised
Walking and cycling	
Safer/ protected cycle lanes and calls for a full cycle network	5
Clearly separate pedestrians and cyclists	1
Unsafe cycle network, particularly near schools and parks	1
Total	**7**
Public transport	
Better bus connectivity to schools	2
Supported for bus lanes	1
Welcomed Park & Ride	1
Cheaper bus fares	1
Total	**5**
Environment	
Believed public transport and cycling can help reduce the city's carbon emission	1
Total	**1**
Council policy	
Concerned that parents will give their children a lift to school if students need to travel long journeys, especially bus timetables not matching with school timetables	1
Total	**1**
Driving	
Reduce cars	1
Total	**1**
Inclusivity	

Bus is not access for all, mainly for elderly and disabled people	1
Good public transport is important as not everyone has a car	1
Total	**2**

Table 14: Respondents' comments for by themes

Q Do you agree or disagree that we should reduce pollution have picked the best way to do it?

Around 60% agreed that the council should reduce pollution, 21% reported they were not sure, 10% disagreed and 7% had no answer.

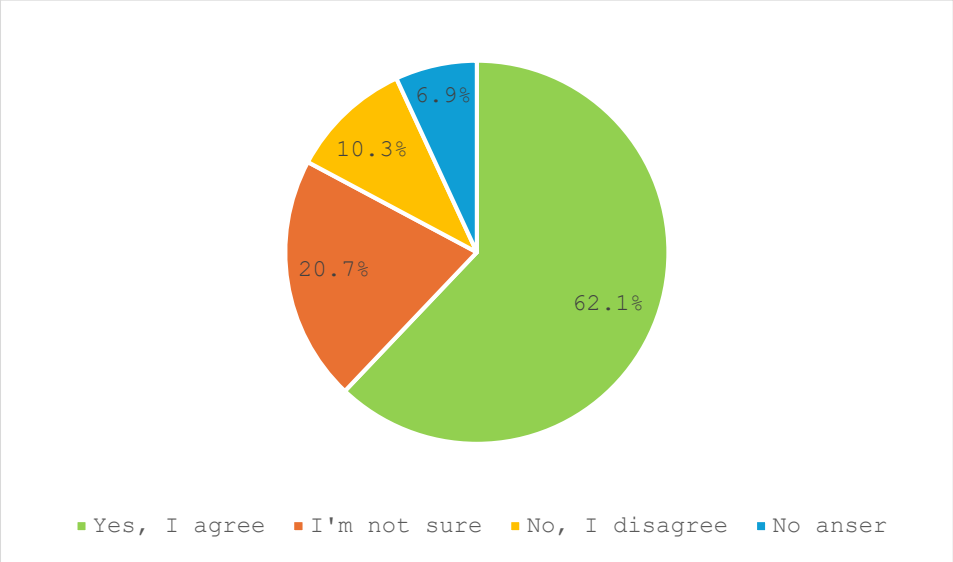

Figure 20: Results of question: Do you agree or disagree that we should reduce pollution have picked the best way to do it?

Comments	No. of times raised
EVs	
Need more chargepoints, fast chargers in accessible areas and affordable	3
Nota a viable option as EVs are not affordable to everyone	2
EVs cannot reduce congestion in the city	2
Supported for EVs to reduce air pollution	1
EVs damage roads and are unsafe as they are quiet	1
Total	**9**
Environment	
Vans are big polluters	1
Total	**1**

Table 15: Respondents' comments for by themes

Q Do you agree or disagree that we should make transport better for everyone and have picked the best way to do it?

Around 76% agreed that the council should make transport better for everyone, 10% reported they were not sure, 7% disagreed and 7% had no answer.

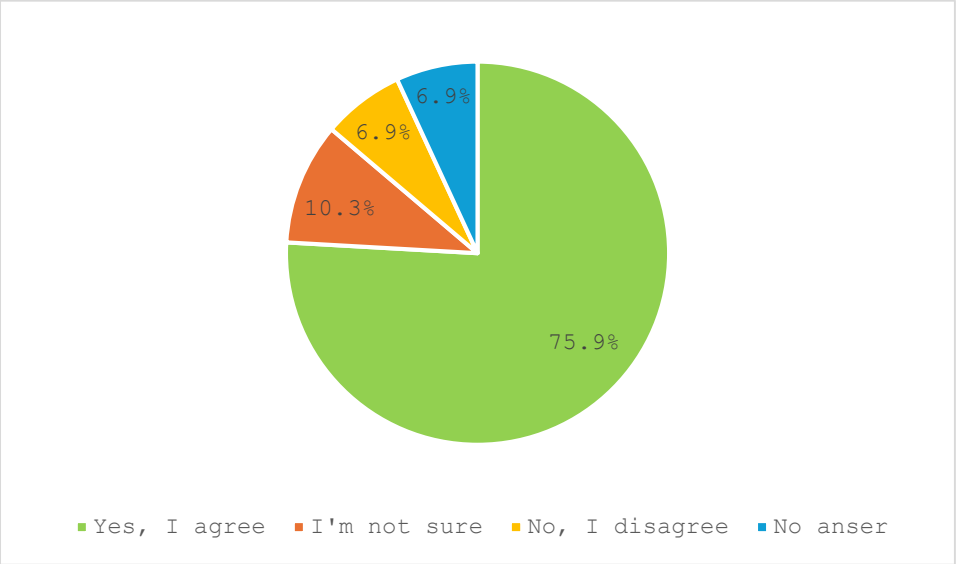

Figure 21: Results of question: Do you agree or disagree that we should make transport better for everyone and have picked the best way to do it?

Comments	No. of times raised
Public transport	
Cheaper bus fares/ free for students	2
Need more areas for wheelchair users	1
Extra bus services to allow students joining school clubs	1
Total	**4**
Parking	
Parking is difficult	1
Total	**1**
Pavements	
Rough pavements	1
Total	**1**

Table 16: Respondents' comments for by themes

Q Do you agree or disagree that we should improve roads and pavements and have picked the best way to do it?

Sixty-nine percent agreed that the council should make improve roads and pavements, 14% reported they were not sure, 10% disagreed and 7% had no answer.

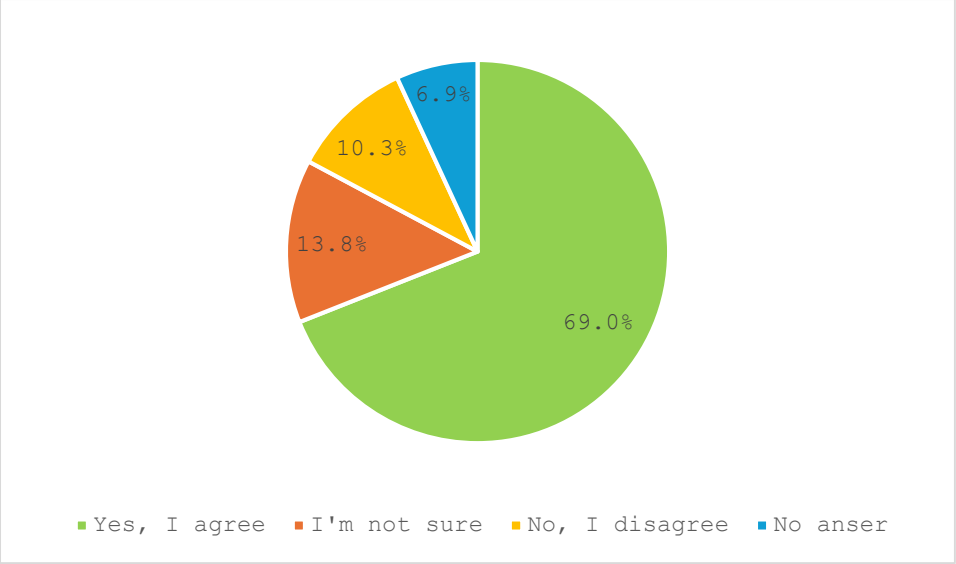

Figure 22: Results of question: Do you agree or disagree that we should improve roads and pavements and have picked the best way to do it?

Comments	No. of times raised
Roads and pavements	
Fix the road, so safer for everyone	4
Pavements are full of weeds and rough	2
Better pavements for everyone (e.g. runners, wheelchair users)	2
Focus on more sustainable routes rather than renovating old roads	1
Total	**9**
Public transport	
Cheaper fares	1
Call for tram	1
Total	**2**
Cycling	
Reduce cycle lanes	1
Total	**1**
Suggestion	
Residents probably wouldn't mind fundraising themselves with community events and donations	1
Total	**1**

Table 17: Respondents' comments for by themes

About you

Q What is your connection to Brighton & Hove?

Almost all of the respondents were residents, 3.4% visit Brighton & Hove regularly and 3.4% reported other.

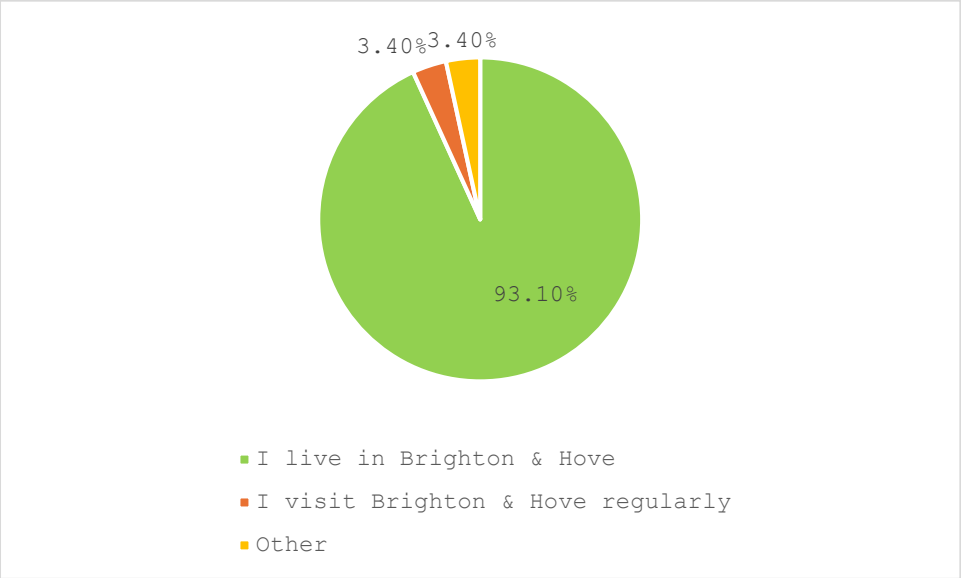

Figure 23: Results of question: What is your connection to Brighton & Hove?

Q What is your age?

Over half of the respondents were 13 to 16 years old, one-third of them were 10 to 12 years old, around 7% were 17 to 18 years old and preferred not to say each.

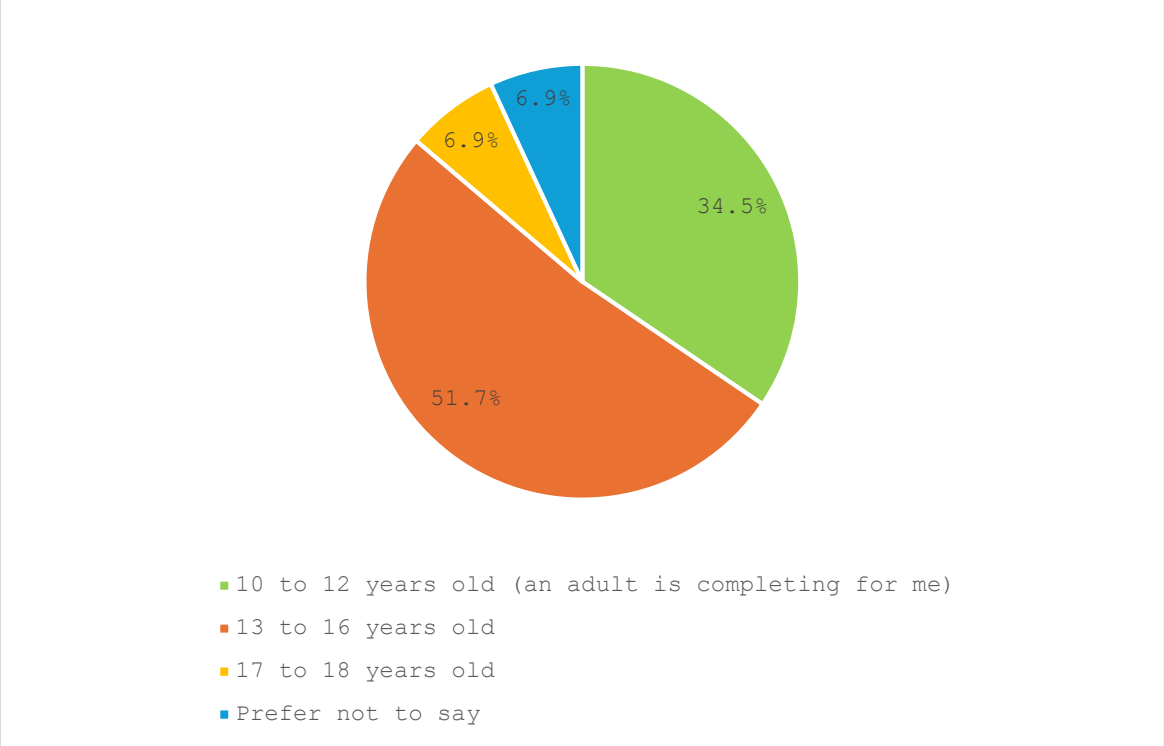

Figure 24: Results of question: What is your age?

Street map

Respondents were invited to provide the street they live on an optional basis. These streets were illustrated indicatively in Figure 25.

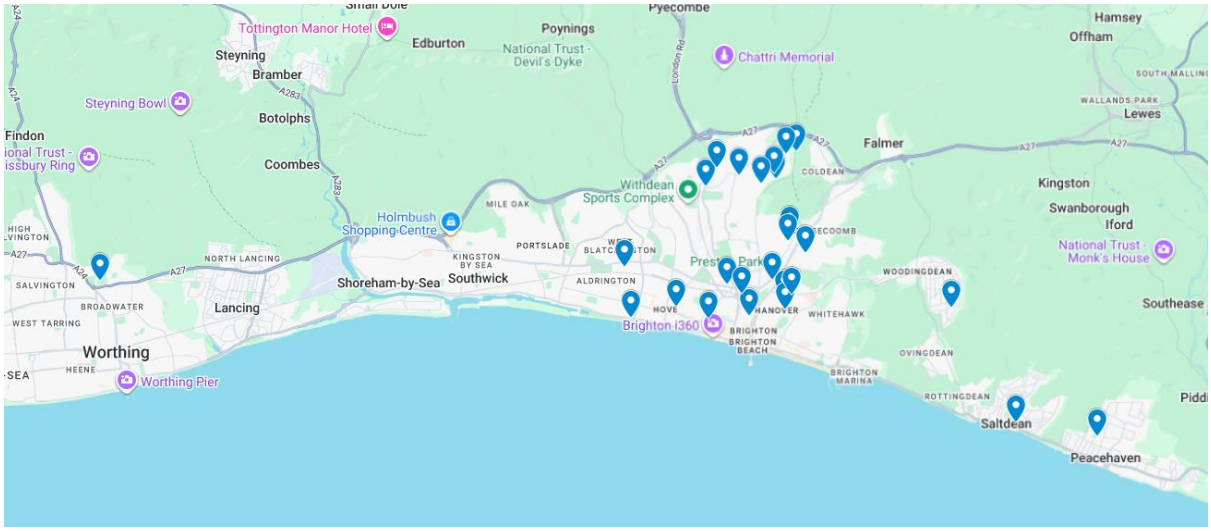

Figure 25: Street map

Feedback and suggestions

Q We want to continue hearing from young people like you. What are the best ways to get your feedback and ideas in the future?

Over half of the respondents reported joining a discussion at their schools is the best way to get their feedback in the future, 17% reported ‘No answer’, 10% selected ‘Completing a survey on Your Voice’, 7% chose TikTok, 3% Instagram and 3% selected ‘Other’ who elaborated that on a multitude of social media platforms would be the best way. They thought surveys and school visits can be useful, but not as many people may pay attention to them. No one selected Facebook and X.

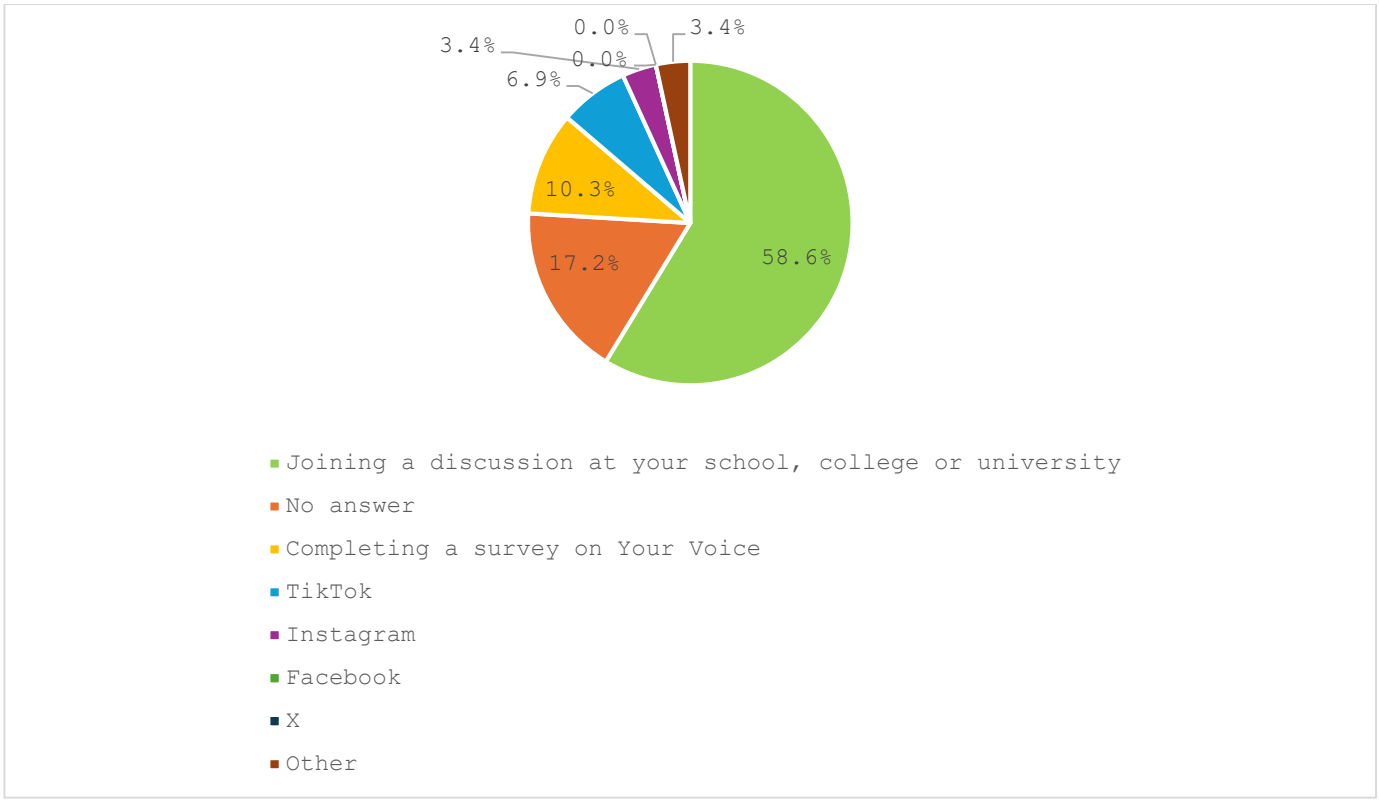

Figure 26: Results of question: We want to continue hearing from young people like you. What are the best ways to get your feedback and ideas in the future?

6 Annex 1 – List of events, workshops and poster distribution

Public events

A public exhibition was in place at the Jubilee Library on:

- 30 June (Monday) – 6 July (Sunday) 2025

Drop-in sessions were held at libraries on:

- Jubilee Library – 1 July 2025 (Tuesday)
- Patcham Library – 8 July 2025 (Tuesday)
- Hangleton Library – 10 July 2025 (Thursday)
- Rottingdean Library – 14 July 2025 (Monday)
- Portslade Library – 16 July 2025 (Wednesday)
- Jubilee Library – 19 July 2025 (Saturday)
- Hove Library – 21 July 2025 (Thursday)

The consultation was also promoted at the following wider events:

- Charge and Drive Experience Day – 21 June 2025 (Saturday)
- A259 Active Travel Scheme drop-in sessions:
  - King Alfred Leisure Centre Ballroom – 3 July 2025 (Thursday)
  - South Portslade Community Centre – 10 July (Thursday)

Workshops/ meetings

Workshops facilitated by officers:

- Cardinal Newman Catholic School – 4 June 2025 (Wednesday)
- Brighton Aldridge Community Academy – 5 June 2025 (Thursday)
- Portslade Aldridge Community Academy – 9 June 2025 (Monday)
- Longhill High School – 12 June 2025 (Thursday)
- Dorothy Stringer School – 12 June 2025 (Thursday)

Meetings attended by officers:

- Taxi Forum – 9 June 2025 (Monday)
- Transport Partnership – 10 June (Tuesday)
- Destination Experience Group – 16 June 2025 (Monday)
- Local Access Forum – 24 July 2025 (Thursday)
- Healthy Weight Programme Board – 28 July 2026 (Monday)
- Possibility People - GIG – 28 July 2025 (Monday)

Posters for the consultation were posted to the following organisations with a letter asking to recipients to display in their premises where possible. Postcards were also distributed to some large venues e.g. leisure centres:

- Brighton Met College, Pelham Street
- Amex
- Royal Sussex County Hospital
- Brighton General Hospital
- Hove Polyclinic
- BUPA Brighton Clinic
- Prince Regent Swimming Pool
- St Luke's Swimming Pool
- Brighthelm Centre
- King Alfred Leisure Centre
- Moulsecoomb Leisure Centre
- Withdean Leisure Centre
- Stanley Deason Leisure Centre
- Portslade Sports Centre
- Hollingdean Community Centre
- Hangleton Community Centre
- Kemptown Crypt Community Centre
- Community Base
- The Phoenix Community Centre
- West Hill Hall
- Millwood Community Centre
- Bmecp Centre
- The Hop 50+
- Vallance Community Centre
- Old Boat Corner Community Centre
- Meadowview Community Centre
- University of Brighton, Grand Parade
- The Ledward Centre
- Patcham Community Centre
- The Edge Community Centre
- Crowhurst Community Centre
- Cornerstone centre
- Hanover Community Centre
- Legal and General
- Amex Stadium
- New England House
- Jubilee Library
- Coldean Library
- Hangleton Library
- Hollingbury Library
- Moulsecoomb Library
- Patcham Library
- Hove Library
- Rottingdean Library
- Portslade Library
- Saltdean Library
- Westdean Library
- Whitehawk Library
- Woodingdean Library
- University of Sussex
- University of Brighton
- University of Sussex Library
- Exeter Street Hall
- St Peter’s House Library University of Brighton

7 Appendix A – Online survey questions

1. Firstly, how are you responding to this survey? Multiple choices

As a resident

I work or study here

On behalf of a business or organisation

As a visitor

As the owner of a business

2. Please tell us your postcode. Short answer

3. What mode of travel do you mostly use different types of trips? Matrix of trip purposes against mode of travel?

Trip purposes	Mode of travel
Commuting to work	*Not applicable*
For education	*Walk*
For shopping	*Cycle*
For leisure	*Bus*
Visit the city	*Train*
	Car
	Taxi or private hire vehicle
	Mobility scooter or wheelchair
	Motorbike or moped

4. What is the name of the business or organisation you're representing? Short answer

Only respondents who selected *On behalf of a business or organisation* and *As the* owner of a business needed to answer this question.

5. What is your name and position within the organisation?

Only respondents who selected *On behalf of a business or organisation* and *As the* owner of a business needed to answer this question.

6. Do you agree or disagree that these 5 challenges are what we should focus our resources on tackling? Matrix of challenges against level of agreement

Challenges	Level of agreement
Challenge 1: enabling more people to live safer, healthier and more active lives	*Strongly agree*
Challenge 2: improving the flow of traffic on our roads	*Agree*
Challenge 3: supporting the transition to low and zero emission vehicles	*Neither agree nor disagree*
Challenge 4: creating a transport network that is more inclusive	*Disagree*
Challenge 5: maintaining our roads and managing them as efficiently as possible	*Strongly disagree*

7. Do you wish to share any comments to support your answers? Long answer

This is a follow-up question to question 6.

8. Do you agree or disagree that these objectives will address the challenges facing the city? Matrix of objectives against level of agreement

Objectives	**Level of agreement**
Objective 1: increase public transport use	*Strongly disagree*
Objective 2: enable the uptake and use of low and zero emission vehicles	*Disagree*
Objective 3: deliver a safe, inclusive and integrated transport system	*Neither agree nor disagree*
Objective 4: create well-maintained streets and pavements	*Agree*
Objective 5: provide active travel choices for all and excellent public spaces	*Strongly agree*
Objective 6: promote and use technology to reduce and manage travel	

9. Do you wish to provide any comments to support your answer? Long answer

This is a follow-up question to question 8.

10. Please rank the project types below in order of importance to you. Ranking

Subsidising public transport to make it more affordable
Maintenance of our roads and pavements
Supporting and encouraging residents, visitors and businesses to use public transport and active travel
Improving the accessibility of our streets
Improving safety with new crossings for pedestrians, targeted improvements at junctions and outside schools
Providing local transport hubs where a range of transport modes can be accessed
Installing electric vehicle chargepoints

11. Please rank the below major schemes in order of importance to you. Ranking

Improving the look and feel of the city centre to make it more pedestrian friendly
Improving bus journeys times in the city through bus lanes and red routes
Improving priority routes for active travel (walking, wheeling and cycling)
Sussex Coast Mass Rapid Transit – an express bus or tram that provides quicker connections between Brighton & Hove and other nearby coastal towns
Improving to access the city centre

New transport hubs at the city's edge offering Park & Ride, EV charging, vehicle hire and help reduce city truck traffic

12. Please share any other comments about Our City Transport Plan 2035. Long answer

13. How did you hear about this consultation? Multiple choices

Social media

Word of mouth

The council's website

By email

Local press

Information leaflet

I attended and event

No answer

Other

14. What gender are you? Multiple choice

Male

Female

Non-binary

Other

Prefer not to say

No answer

15. Do you identify as the sex you were assigned at birth? Multiple choices

Yes

No

Prefer not to say

No answer

16. What is your age? Multiple choices

18-24

25-34

35-44

45-54

55-64

65+

No answer

17. What is your ethnic group? Multiple choices

White

Asian/ Asian British

Mixed/ multiple ethnic groups

Black/ African/ Caribbean/ Black British

Other ethnic group

Prefer not to say

No answer

18. Do you have a health problem or disability? Multiple choices

Yes, a lot

Yes, a little

No

Prefer not to say

No answer

19. Your condition(s) Multiple choices

Physical Impairment

Long-standing Illness

Mental Health Condition

Autistic Spectrum

Sensory Impairment

Learning Disability / Difficulty

Developmental Condition

Other

No answer

8 Appendix B – Youth survey questions

1. What is your age? Multiple choices

10 to 12 years old (an adult is completing for me)

13 to 16 years old

17 to 18 years old

Prefer not to say

2. What is your connection to Brighton & Hove? Multiple choices

I live in Brighton & Hove

I visit Brighton & Hove regularly

Other (please specify below)

3. What is the street you live on? Short answer

4. Tell us how happy or unhappy you feel about traveling on your own without an adult. Matrix of mode of travel against level of happiness

Mode of travel	Level of happiness
Walk	*I don't travel this way*
Bus	*Very happy*
Cycle	*Happy*
Scooter	*OK*
Train	*Unhappy*
Other	*Very unhappy*

5. Do you agree or disagree that we should help people be healthier and have picked the best way to do it? Multiple choices

Yes, I agree

No, I disagree

I'm not sure

No answer

6. Do you have any thoughts on this? Long answer

This is a follow-up question to question 5.

7. Do you agree or disagree that we should focus on improving journeys for buses and bicycles and have picked the best way to do it? Multiple choices

Yes, I agree

No, I disagree

I'm not sure

No answer

8. Do you have any thoughts on this? *Long answer*

This is a follow-up question to question 7.

9. Do you agree or disagree that we should reduce pollution have picked the best way to do it? Multiple choices

Yes, I agree

No, I disagree

I'm not sure

No answer

10. Do you have any thoughts on this? *Long answer*

This is a follow-up question to question 9.

11. Do you agree or disagree that we should make transport better for everyone and have picked the best way to do it? Multiple choices

Yes, I agree

No, I disagree

I'm not sure

No answer

12. Do you have any thoughts on this? *Long answer*

This is a follow-up question to question 11.

13. Do you agree or disagree that we should improve roads and pavements and have picked the best way to do it? Multiple choices

Yes, I agree

No, I disagree

I'm not sure

No answer

14. Do you have any thoughts on this? *Long answer*

This is a follow-up question to question 13.

15. We want to continue hearing from young people like you. What are the best ways to get your feedback and ideas in the future?

Joining a discussion at your school, college or university

Completing a survey on Your Voice

Tiktok

Instagram

Facebook

X

Other

No answer

Respondents selected *Other* can write down their suggestion(s).

9 Appendix C - Organisational responses

Bricycles
The challenge of reducing the number of car journeys should be specifically included - not just increasing public transport and active travel and switching to zero-emission vehicles.

The park and ride plan to increase public transport use can only succeed if it also removes city centre visitor parking, to make the P&R the more attractive option. If drivers can still easily park in the centre, they will not choose the public transport option. There also needs to be signs at/before the P&R location to indicate when any city centre parking is full and the P&R is the only option. City centre parking spaces that are replaced by P&R spaces should be reallocated to resident's permit holders to free up on-street parking spaces to be reallocated to protected cycle infrastructure and wider pavements. Objective 5 (to provide active travel choices) should include introducing new residents' bike hangars in areas with high demand until there are no waiting lists and also secure cycle parking at the destination - repurpose unused city centre shops to provide secure, guarded cycle parking during peak shopping and visit.

Active travel is key to addressing inequalities.
Safe cycling gives freedom to children that are too young to drive
For low/no income residents, the bus is likely to be expensive
Disabled people can also benefit from cycling investment. For some people with disabilities, cycling is more achievable than walking. Mobility scooters have been using cycle lanes, too, which is welcome.

The 'Major scheme to improve city centre walkability' which the plan refers to, needs to be a car-free city centre, covering at least the Lanes and North Laine areas (with the usual allowances for deliveries, residents and blue badges). This was the number one recommendation of the Climate Assembly in 2020 and has been shown to work really well in so many European cities.

Brighton & Hove Bus and Coach Company
Challenge 1 should also note that bus users walk to and from the bus stops so are closely associated with active travel.

Challenge 2 highlights the issue of congestion and the need to improve traffic flows. This is absolutely critical for bus services as slow bus operating speeds and poor reliability very negatively impact on bus use. The city has the highest bus use in the country outside London by a significant margin and much of this has been achieved by delivering bus priority measures in the city so buses can be attractive and reliable as every survey of bus users shows that this is the most important thing to them. It is vital for the plan to further recognise the importance of bus priority over private cars as this is a key factor in the city's exceptionally high bus use. Other measures such as lower speed limits, active travel schemes and additional traffic lights have slowed bus speeds in the city in recent years, increasing the cost of operating the service (and therefore fare levels) and making it less attractive than it would otherwise be. It is key that we do not stop developing further bus priority schemes. Without more bus priority there is a serious risk of bus patronage falling. The first two red routes have been excellent and the planned additional schemes will improve the service for bus users, as will traffic offence enforcement on buses.
Express services are deemed highly desirable has been demonstrated by the 1X launch in 2024 and enhancement in 2025. Another new limited stop service is being launched in 2025 and it is important to appreciate the importance of people's time that is saved by getting people to their destination more quickly.

Challenge 3 stresses the importance of switching to zero emission vehicles and this will include buses. A challenge with this is being able to convert bus depot infrastructure to electric vehicles as well as range challenges with them. There will be significant electric buses coming to the city in 2026/27 and beyond.
As noted in the detail, shifting journeys on to public transport is a way of making major reductions in emissions and the action of prioritising buses is the single biggest way to support this.

Challenge 4's ambition of an inclusive transport network is wholly embraced by Brighton & Hove Buses who are the UK's only bus company who are Leader status in the DfT's Inclusive Transport scheme and winner of the Best Practice in Diversity, Inclusivity and Accessibility Award at the National Transport Awards. It is vital that the infrastructure supporting bus services is fully accessible and we continue to advise strongly against the use of bus stop bypasses, especially where they are less than the DfT's minimum recommended width in LTN 1/20.
Although the city has one of the best Night Bus networks in the country (operated wholly commercially), there is scope to improve inclusion in the city by improving this further to help access to jobs and grow the night-time sector.
Enabling safe travel on public transport is key as inclusivity is damaged by some potential users feeling unsafe on buses and trains as well as getting to and from stops and stations. The provision of Travel Safe Officers on the bus network and CCTV and better lighting key bus stops could really help here.
New and improved bus services can help reduce inequalities in the city and planned service improvements in September 2025 help to provide new links to some of the areas identified as having some of the biggest challenges.
The price of bus services is determined by the cost of operation, which increases significantly when bus speeds worsen. Bus priority and faster bus operating speeds can keep fares lower for everyone.
Objective 1 includes an outline of the summary of the BSIP which we strongly support. However, there are other projects that could also help to increase public transport use such as more frequent commercial services, more Night Buses and safer travel initiatives (Travel Safe Officers and CCTV/better lighting at bus shelters) which also relates to Objective 3.
There is a lot of joint work that we are keen to partner with the City Council on to improve safety on buses, especially in relation to Violence Against Women and Girls. Objective 6 mentions bus traffic light priority which is very welcome but it would be good if this could be expediated - East Sussex has rolled it out across almost all traffic lights in the county over a very short period of time.
The document refers to buses being suitable for short trips but buses can also play a key role in longer journeys, as is demonstrated by the large number of bus users travelling from Brighton & Hove to regional destinations including Eastbourne, Newhaven, Worthing, Lewes, Uckfield, Tunbridge Wells, Crawley, Haywards Heath etc. Brighton & Hove Buses is keen to further develop these links.

The Transport funding section on page 38 in the bus section should also refer to the investment made by transport operators. For example, Brighton & Hove Buses is investing nearly £50 million in the city between 2024-2026 in 117 new buses and totally rebuilding the depot in Hove to be able to run EVs and additional buses. Likewise, the narrative about bus service should make the point that the city has an exceptionally high proportion of bus service operated commercially, without taxpayer support. The statement on page 44 that funding for bus services is historically high isn't correct in comparison with other areas which also generally have much poorer provision.

The BSIP refresh includes further development of proposals for bus priority or improvements that will help buses at Downs Hotel junction in Woodingdean and in Rottingdean. These aren't listed in the plan.

Brighton & Hove City Council - Principal Emissions and Air Quality

Road safety appears to be higher up the hierarchy than reducing pollution - a much higher risk factor for health

Social responsibility that maintained roads and pavements only use ultralow or zero vehicles and machinery
Relating to transport projects to objectives achieve: emissions and air quality not specifically mentioned in the priority order. Risk this is not part of pre-scheme discussion and assessment. Something added on as a secondary after thought or in reaction to public and Cllr enquiry. Low emission is not the wording used with bus-ULEZ and the AQAP and is incorrect. LTP needs to refer to ultra-low and zero throughout. Low emission is polluting and backward compared to the 2025 situation. Low emission has been available for twenty years and is not the future.

Brighton & Hove City Council – City Plan
As recognised in the draft LTP our road network struggles to cope when there are lots of people on the move at the same time and there are very limited opportunities to increase the capacity for motorised vehicles. Through the emerging City Plan 2041 we will be allocating additional development sites with the aim of meeting as far as possible the city's needs for additional housing and employment space. Further development could place additional demands on the existing transport infrastructure, in particular the road network. We therefore strongly support the objective of giving more people the option of choosing active travel so that additional development does not cause unacceptable impacts on the existing transport infrastructure. In particular, the junctions on the strategic road network along the A27 are all known to be near capacity with limited scope for upgrade without major works which are not currently funded. Additional traffic movements caused by significant new development risks the operation of these junctions becoming unsafe in the view of National Highways.

It is important that strong connections are made between the LTP and the City Plan 2041. We note that this connection is explicitly made in the draft and we look forward to continuing working closely together as both plans evolve.

Brighton and Hove Cycling UK
There is too much motor vehicle traffic everywhere and we need Road Traffic Reduction in Brighton and Hove, quantified and monitored as a KPI. A Liveable (car free?) City Centre was expected, but this does not appear.

The big question is how you interpret the challenges and the objectives and the subsequent actions. We welcome Brighton and Hove City Council's good work in extending the cycle network e.g. Valley Gardens Phase 3, the A23 Phases 1a and 1b, Better access to the Marina, continuing the roll out of bike hangars and bike share, also speed reduction, School Streets, cycle training and other work. We look forward to improved cycling/wheeling/walking facilities on the A259 and the A23 Phases 2 and 3 and other Active Travel schemes.

We are glad to see that you will continue to enable "active travel (walking, wheeling, cycling) and public transport" However, we are concerned that there is no major headline about Road Traffic Reduction or about a Liveable (car free) city centre in LTP5. We support strongly decarbonisation, but switching to electric vehicles isn't enough. Your own document says: "The graph shows that while Our City Transport Plan 2035 policies will make a positive impact on reducing carbon emissions there remains some way to go to get close to the CCC balanced pathway." And "more needs to be done to reduce emissions".

We need more than electric vehicles to reach carbon emission targets. We need Road Traffic Reduction. We also need this for air quality improvements and to reduce road danger. Reduction in motorised vehicle mileage should be included in your Key Performance Indicators (KPIs). "Balancing" essential carbon reduction against other policies an relying on national measures or other stricter authorities is not dealing with the issue. There needs to be consideration in the LTP of the need for a clear limit for road traffic coming into the city.

Given the current objectives in the LTP, the streets of Brighton and Hove might simply fill up with electric cars, EV charging places and buses, probably stuck in traffic jams. Even Objective 6 "Promote and use technology to reduce and manage travel" does not put forward a limit for car trips and seems to be more about managing high levels of motor traffic. It is very unfortunate that the government subsidies for electric vehicles do not provide the opportunity for people to switch to an e-bike and public transport i.e. no car as a first and cheaper option. Perhaps something along these lines can be introduced at local level? Research is showing that when people switch to EVs, they do more mileage because home charging is cheap. People are also choosing to buy bigger and heavier cars (43% SUVs) that are more likely to kill or seriously injure people (especially children), take up more road space, cause more damage to roads and infrastructure.

The permeability of the city by cycle is reducing. Roads like North Street are heavily trafficked and therefore unattractive, while the quieter streets are being used for café tables, trader equipment or closed for events, as are parks like Preston Park. We do need to see clear passage for cycling and cargo bikes if they are to replace deliveries by van and HGVs. Challenges 1-5 – points below. Challenge 1. Very strongly support the active travel schemes mentioned on page 19. It is well know that there is under reporting of cycling injuries this needs factoring in. Sussex Police are no longer in the SSRP. Does the council get full and timely data about collisions? Besides ensuring good provision for walking, wheeling and cycling, and public, shared and community transport, councils should seek to manage travel demand, both in general (e.g. through land-use planning policies and/or investing in digital connectivity) and specifically by private motor vehicles.

Land-use planning policies should ensure that the location and design of new developments support a low traffic future, reflecting the '15 minute neighbourhood' principle, where key destinations (schools, shops, healthcare, etc) can be reached within a short walk/wheel or cycle ride of people's homes. Challenge 2. "Improving the flow of traffic on our roads" is not necessarily a good thing at all if you are talking about motor vehicles! (The term traffic can also apply to cycling and walking.) Having fewer motor vehicles on roads and streets is desirable. Sometimes traffic needs to be held back because it is stopping people cross the road, degrading the streets, deterring active travel, causing infrastructure damage and preventing social contact due to noise, obstruction, emissions etc. Also, it has the capacity to kill and injure especially at higher speeds.

We observe the administrations enthusiasm for park and ride, described as "purpose built". This will be an additional car park somewhere on the city edge and will not reduce road traffic unless an equivalent number of car parking spaces are removed from the city centre. This is also an expensive way to reduce driving in the town centre, with the cost of a car park and subsidised bus fares. Road user charging schemes are needed to tackle congestion and pollution, by managing demand for private motor vehicle trips. Motor vehicle traffic restrictions should be considered to improve the ambience in the town centre, to reduce carbon and air pollution, the domination of streets, collisions and casualties. We strongly support the reduction of HGVs in the city. They are a danger to people. But there will need to be careful planning and management to ensure that "mobility hubs" on the edge of town do not simply become a big car park, adding to the many car parks already in the City.

Cars are also getting bigger and taking up more space. What will be the cost of providing Park and Ride? If Park and Ride is introduced, we need removal of an equivalent or greater number of parking places in the city centre or we will simply be adding to parking and motor vehicle movements, and also subsidising them with the £7 charge which covers both (all day?) parking and bus transport for all passengers. This would encourage more journeys along the A27 and from elsewhere to take advantage of a cheap rate. The Park and Ride site could be a car trip generator when we instead need investment in better end-to-end public transport and more safe, connected active travel routes.

We support the council to urgently and strongly lobby government for powers to stop pavement parking. There is a cycle route (Regional Route 90) running from Brighton-Falmer-Lewes. More Park and Ride motor traffic can bring hazard. We note there was a major collision at Knights Gate Road/Falmer Road in May 2025 which left a mass of debris and demolished a solid flint wall as the crash crossed a cycle track. We have asked BHCC for details Challenge 3 is not optimised. The best transition is not to another motor vehicle. EV's are only emission-free at the point of use, and a lot of carbon is used to manufacture electric cars. There are also Lithium mining issues as well as the ongoing toll of road injuries, and domination of public space due to car driving. It is unclear how exactly and to what extent Brighton will contribute to “60% of the UK fleet being fully battery electric by 2035” and a “9% car trip reduction by 2035”.

Vehicle scrappage schemes can help people give up older and more polluting cars or vans. However they should offer alternatives to another car, i.e. public transport season tickets, new e-bikes or cargo bikes etc. Yes, to cargo bikes instead of HGVs. but Brighton centre is becoming less permeable to cycling, especially if taking a cargo bike through Ship Street, Black Lion Street, parts of North Laine etc. Because people are buying larger cars (SUVs) fuel efficiencies are being negated. Electric cars also contain large heavy batteries.

Challenge 4 It is good to review bus services but also to review the potential for cycling. Regarding your point on P.28 that “Walking and cycling are the modes with the least pronounced variation by household income…A transport network that prioritises walking and bus users is one that helps to make it more inclusive for all.” It is unclear how the “areas at risk” of TRSE equate to the number of people/households actually at risk in the area. Buses cannot run everywhere all the time, but cycling (like walking) is unlimited by timetables and so is absolutely irreplaceable for those who do not or cannot drive. The point you make also refers to *current* transport choice, but cycling has been greatly disadvantaged over many years by the growth in motor vehicle traffic, increased road danger and the severance of cycle routes. Your conclusion does not consider the potential for cycling to replace motorised journeys or for cycling plus public transport to replace car trips once a fuller cycling network has been established. Currently we do not have such a network. Improved accessibility for disabled people also needs to be taken forward by the train service providers due to steps at many stations.

Challenge 5. Potholes and poor road surfaces are a hazard for active travel and we are strongly supportive of good maintenance. OTHER POINTS Neighbours: TfSE has a big roads agenda, and our closest neighbours (WSCC and ESCC) show little ability to build cycling infrastructure. We note two TfSE Active Travel routes listed in LTP5, H1 Sussex Coast and M11 Brighton to London, NCN. We support these of course, but there is no detail. Most funding is going to infrastructure for driving. Being in a single Mayoral Authority with ESCC and WSCC will expose the Brighton and Hove area to the roads agenda favoured by the county councils and therefore more road traffic being delivered via the major A roads.

TfSE was in favour of the Lower Thames Crossing, an expensive, traffic generating scheme. Brighton and Hove City Council has not yet fully distanced itself from this counterproductive agenda. We note that the LTP says: “this plan does not advocate extensive new

roadbuilding” and we strongly support a switch from funding road schemes to active travel infrastructure instead. This will also benefit nature and biodiversity. Funding: When there is such a mixed bag of schemes, it is important to ensure that the more sustainable and cycling schemes are not deferred, while the less sustainable (road upgrades) are taken forward. Joined up planning: From Brighton & Hove Physical Activity and Sport Strategy 2024 to 2034 “We need to widen access to opportunities to be active in our parks, the South Downs and on the seafront to harness the unique potential of our city’s location and the benefits of being active outdoors and in nature.” Whilst the LCWIP and ROWIP are separate documents for administrative and governmental purposes, we need to see some joined up planning, with ambitions for active travel combined in one plan.

The two council departments (ROW and Highways/transport) need to be brought much closer together so that routes for cycling are looked at holistically, and that the lack of safe crossings over major A-roads like the A23 and A27 or paths along these roads are given more attention. For example, as NCN20 (still within the BHCC boundary) turns left at Patcham’s Mill Road, it goes through a two-way narrow rail bridge onto a 60 mph (NSL) speed limit road where a right turn is expected to continue. Fast traffic needs to be slowed and narrow, dangerous areas for walking/wheeling & cycling need to be improved.
This survey limits the respondent far too much by offering only selected choices. It is designed to seek endorsement rather than views. Tiny linear text boxes in this survey for responses on these transport issues are inadequate.

Brighton and Hove Clarion Cycling Club
Low emission vehicles (i.e. electric cars) seem to be prioritised here over the importance of no emission vehicles such as bicycles and electric bikes (very small amount of emissions). Electric cars produce emissions, not least tyre particulates. Furthermore they encourage the use of car driving instead of walking and cycling, with roads designed for car use, not active travel use.

Instead of a bland 'improving the flow of traffic on our roads' we need to see a 20mph speed limit throughout the entire city. Not doing this and/or not enforcing this is in direct contradiction of challenge 1.

https://post.parliament.uk/research-briefings/post-pb-0065/

We also need to see much greater emphasis of making many more streets car free, particularly in the centre, North Laine and all of the Lanes for example.

There should be a target of a minimum width for pavements of two metres everywhere in the city. Brighton and Hove should pressure central government for a total ban on pavement parking and this should be enforced.

Pavements should also be freed up from bins and other street clutter. Bins, signs etc should be placed in the road.

There is nothing in the city plan which encourages the development of play streets. Many parts of the city have small or no gardens. Children have never been balloted about the denial of space for streets to play on.

https://playingout.net/

Other countries take play streets for granted and it is hugely disappointing that Brighton and Hove council do not have any vision for this.

Park and ride will only succeed if city centre parking is removed. There should be signs to

say that city centre parking is full and park and ride is the only option. City centre parking spaces should then be freed up for residents which in turn, would free up space for cycle parking, trees, pocket parks and so on.

Empty city centre shops could be re-purposed as cycle parking.

There is no mention of the importance of trees in making pleasant and attractive walking and cycling routes. Trees are hugely important in the regulation of temperature caused by climate change. They also encourage people to use streets as active travel thoroughfares.

Disabled people and children benefit massively from safe cycling and walking routes. Over a third of Brighton and Hove residents do not have access to a car and although bus fares have been pegged, they are still expensive. Many disabled people can cycle even if they can't walk. Children would benefit if they had access to completely safe cycle lanes (Paint is not Protection).

20 mph throughout the city. Prioritising active travel, cycling and walking, rather than electric vehicles. Making much more of the city car free especially the city centre, North Laine and the lanes. Making it much easier to cross roads by narrowing street entrances rather than having them convex. Provide a full network of segregated cycle lanes to the latest design specifications. Implement a series of play streets only open to residents at 5mph giving children the freedom to play out. Plant more trees in the streets.
Introduce low traffic areas and re-install the Old Shoreham Road bike land along with many other bike lanes

Brighton and Hove Older Peoples' Council

Transport and Parking Issues for Older People reported as consistent accessibility themes to Brighton and Hove Older People's Council.
Please take this submission into account with the transport strategy review and for the Equalities Impact Assessment
Sept 2025

Background
• Social Isolation remains a huge issue for older people in our City - Older people reporting social isolation are high, both nationally and locally.
• Reducing isolation needs continued attention- Accessibility issues mentioned below , exacerbate isolation, and lack of independence and well-being- (also closely linked to housing , community development, & health issues.)

• Health problems affect mobility for many older people, who do not qualify for a blue badge, but can not walk far or are concerned about falls. Issues affecting older people with mobility problems often intersect with issues affecting people registered as disabled.

• 'Active transport' is impossible for many of us. Car use remains essential for many older people's access to our City, resources and opportunities. Accessible parking (not all relying on having smart phones) therefore continues to be a huge issue for many older people and we believe it should be considered within any transport policy.

• Only 25% of older people over 75 have IT access.

1. Public Transport
1. You can only get cheaper transport tickets if online.
2. We welcome many considerations to promote accessibility issues on B&H buses. Also continued opening of rail ticket offices.

3. We need shorter bus stop intervals. Also on more outlying areas.

4. We need a bus along the seafront. Older people, and others with with mobility issues are excluded from vibrant hubs of central seafront. Could at least one of the 12 bus go along the lower promenade and up Dukes Mound rather than along the upper seafront road. Also 700 to start at the Steine and go along the seafront.(we appreciate it may need to go up to Churchill square at some point to be financially viable).

5. There are too long distances between bus stops , especially from Old Steine to St. Peters Church- renders North Laine area inaccessible. Also Churchill Sq to Waitrose on Western Rd renders shops along that stretch inaccessible. Please reinstate bus stops at King and Queen and Western Rd eg Clarence Square. We have concern about new seafront cycle paths reducing access by car and permanently ruling it out as a bus route?
6. We need beach access for people with mobility problems. This needs addressing urgently if a City promoting diversity and equalities.
7. Door to door community transport eg for shopping is good, but very limited
8. It would be great if new buses don't jolt as they stop- this is a falls risk.
9. Accessible Park and Rides would be welcomed.

2. Car Use is still necessary for many with mobility issues and disability-
1. Distance between bus stops makes reliance on buses difficult for many, especially in more outlying areas.
2. Mobility within the buses (However well adapted) is not possible for some. But wheelchair spaces and reserved spaces are welcome.
3. We appreciate the need to reduce traffic queues and pollution but for people with disability/blue badges no stopping red lines have stopped our access to shops and facilities in some are as further exacerbating our disadvantage.
4. Car use is not only needed for people with physical health issues, but also for many with mental health issues, eg anxiety, and neurodiversity. Cars can be a 'safe space' to enable access to the City and resources, where public transport or active transport is not possible.

3.Parking
1. Needing phones/apps to park discriminates against those who don't have can't use IT.
2. We need to be able to park without having to have Smart phones - For Older people without, or who can't manage, phones, & poorer people who may not be able to afford phone credit. Inability to park increases reluctance to go out, increases isolation and exclusion. We welcome the return of some pay by card meters. This needs extending to all areas. It is said this will be reviewed, but We would like involvement, to be heard, in review of this.

3. There could be scratch off vouchers you can buy in multiples of a £1 could be sold in shops with advertising space on the back to minimise council cost. Also it may result in increased revenue as more people use them

4. Visitor parking permits were really hard to apply for online. It has actually improved recently, hopefully as a result of feedback. Thanks. The system appears to have improved recently for online, but there is no encouragement of application in Council reception areas or by post. These alternatives need promoting.
5. Parking permits are hard to apply for- have to upload documents, then wrong size etc. (Again, this has improved a bit recently if you have already provided documentation. Thanks). Need to be able to take documents in. We have security and data protection concerns about the amount of personal information held by the council for parking permits. Eg Bank statements & utility bills.
6. Visitor permits are expensive and only for 24 hours- we need shorter cheaper ones- expensive, longer visitor permits stop people 'popping in'- increasing isolation.
7. Parking charges and fees remain relentlessly high. We welcome revision of these, at least

in city car parks.
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4.Active travel, electric vehicles and pedestrian safety

We appreciate the need to encourage healthy lifestyles and clean air.
Unfortunately with some mobility issues for the majority of older people, at some point active travel is no longer possible.

Opportunities for walking for our health and access to facilities and green spaces is generally welcomed by older people. Walking outside is a safety issue frequently reported to us through uneven pavements, especially with tree routes, pavement furniture (signs and tables) etc. This is especially the case in the dark and for people with sight impairments, or who are unsteady.

Shared spaces for cycles and pedestrians are particularly hazardous.
Use of electric Brighton bikes requires internet access.
Whilst electric vehicles are positive for clean air, they remain very expensive, so to reduce parking spaces further for the less well off at this stage is a tension. Wires to houses for charging vehicles can be a trip hazard, although we understand that the Council is taking steps to reduce this hazard.

Brighton Buswatch

Starting with some praise: Much of the current LTP4 has basically offered a cycle and pedestrian only transport policy, with few positives for bus users, apart from some accessible kerbs. This has all changed with Trevor Muten becoming the lead Transport councillor, with his keen interest in bus services.

Since when, we are likely to obtain several red routes, two short bus lanes, and an updated real-time information system (although we cannot blame Trevor for its poor implementation). However, the key concern is- the LTP5 shows little sign of these positive ideas continuing beyond this brief golden age, with its current short-term programme. Especially if we have a change of Administration responsible for the transport portfolio. Beyond this brief positive window, the council's ongoing programme, only relates to items such as supporting bus routes, fare subsidies etc. None of the infrastructure that pays for itself over and over again is mentioned.

So, for Buswatch, the LTP5 is a hugely disappointing document. Whereas other councils let key stakeholders see the later drafts – so as to iron out important issues, before general publication; this was not the case in Brighton & Hove. It has stated that some consultation took place in 2021. Given the policies listed, there are question marks over how much input those connected with bus services had into the drafting of the document.

The main bus company has repeatedly stated that bus priority offers the single greatest help to bus services. This is barely mentioned, and does not appear at all in the forward programme (post 2025/6) at all! Let us first start by examining what a success Brighton's bus services have been:-

Over recent decades, most cities outside London have suffered a substantial drop in bus usage, whereas Brighton has seen at least a 50% increase, to what was the highest ever bus usage. Part of this success has been the unified network, built on positive ideas from the local bus companies. However none of this would have been possible without the positive infrastructure, such as the bus lanes, to make buses acceptably reliable (plus other measures such as the best bus real-time information system available, accessible bus stops etc.).

This increased bus usage has underpinned the regeneration of the city, from the run down eighties, to the vibrant buoyant city we see today.

This public transport solution has prevented more severe congestion problems, had a more car based approach to regeneration been pursued. Worsening traffic congestion within the city would have likely stifled this growth.

Buses are positive in so many other ways, offering a high quality all inclusive travel modes, including for those with disabilities. The high frequency on many bus routes makes it an attractive alternative to using a car, or even needing to own a car. Because Brighton has a lower car ownership rate than most cities, the bus often makes better sense- combined with the good rail connections.

And by offering such an attractive alternative to using the car, it reduces the city' Carbon emissions. All this has been achieved for many years, without any significant council subsidy, including a good night bus network- boosting the evening and night-time economy.

So how does the LTP5 respond to this golden transport mode, which is so essential to the social and economic fabric of the city? In a couple of words- very poorly.

While the report does mention that the city has the highest bus usage (pro-rata) outside London, this appears to be in isolation, not suggesting how this has been achieved, and could be maintained. We only need to look at the success of the express bus routes (1X, 12X, 13X etc.) to see how these could be further developed, if we had even more radical bus priority measures.

There is no mention as to how increased use of bus services has transformed the city. The only other mention of bus usage is to mention that bus usage has reduced slightly since the pandemic. What it does not mention is that bus usage has reduced less here, than in most other areas!

Also the main report fails to mention that the council's household survey showed that for shopping, or personal business- almost half (45%!) of respondents travelled into the central area by bus!, which is at least twice of that who travelled in by car. This important fact reinforces the vital importance buses play in the city's economy, and further emphasises the deficit in current policies towards buses, covered in the LTP5.
This information was hidden deep within the supporting Evidence base (P35).

Looking at LTP5: Starting in the Executive summary:

Challenge 1: should have been encouraging bus usage: This has so many advantages- economically and socially. Conversely if bus services are undermined by poorly designed policies and proposals; then this also undermines so many other bus positives- such as inclusivity, affordability, lowering toxic and Carbon emissions etc.

So where is encouraging bus usage in the list of challenges- it is not listed!

On supporting the transition to Low and zero Carbon vehicles (Challenge 3), the report concentrates on replacing diesel and petrol vehicles, with pure electric vehicles. These scenarios rely heavily on the public being willing to change their propulsion mode, for which there are increasing signs of resistance. Also there is the need for buses to have sufficient range, so that they can comfortably operate all day, without needing a recharge (otherwise there is substantial extra cost from duplicate buses- while the buses are being recharged;

and extra staffing costs).

There is no mention of how the current high bus usage significantly lowers the city's Carbon emissions, and how this should be encouraged. Especially as the Carbon reduction from increased bus usage is underreported, as covered later in this document. This will provide a guaranteed reduction in Carbon emissions.

While some valid points are made in 'creating a more inclusive network' (Challenge 4) particularly for disabilities, the disproportionate coverage of low income families (with some questionable graphics, and the overuse of national data) may not reflect local realities. The over reliance on this criteria, is likely to generate policies that undermine the overall needs of bus passengers.

Objectives:

It is good to see Increase public transport usage is 'Objective 1'. However that is where the good news ends.

If you look at both short term and long term priorities- you will not see bus priority (especially bus lanes) listed at all. The list relies heavily on rail schemes, for which the council has little mandate, and big schemes, for which the council has a particularly poor record.

Even looking at BSIP priorities for 2025 to 2030, bus priority does not appear on the four listed priorities. It is only within one of the eight 'actions' on page 32, that bus lanes (and other priorities) are mentioned. This is hardly a ringing endorsement within the council priorities. There is no other bus priority measure listed beyond this coming year, whereas the A259 Active travel scheme is listed perhaps to 2028.

The council does have a programme of suggestions for cycle and pedestrian enhancements (LCWIP). In addition, by the speed at which the new cycle lanes were introduced during the pandemic, this may indicate that council officers had already spent money on creating these designs, as these were ready to roll out, with weeks.

If only the same was true for bus priority. We have been reliant on Council Muten and the bus companies pushing for the bus lanes, red routes etc. that have been created over the past couple of years.

There was a document, misleadingly called the 'Bus network review', containing a number of bus lane proposals. While it could be argued that this document could have been far better, at least some priority was on the cards. The impression has been gained that this document has been dropped, leaving no bus lane priority measures in the pipeline. This action document is certainly not listed within the Council plan's 2023-27 decision documents, on page 16, whereas LCWIP is.

While signal priority is being considered for the Eastern Road corridor, this is tiny compared to the overall need (and may not be indicative of the best results achievable). At modest cost, East Sussex County council (covering a far larger area); is in the process of adding bus priority to every traffic signal in the county, where buses run. This should be a huge embarrassment to a city that is so reliant on its bus services.

Projects chart: The funding chart could be regarded as misleading.

The figure given is for BSIP funding. By leading with bus lanes etc. (rather than revenue funding- which represents most expenditure), this may leave a casual observer thinking the

council for 2025/6, is spending ten times as much on bus schemes, than most other items listed. This is highly misleading, as the vast majority of this money is being spent on revenue items such as supporting bus services, subsidising fares etc.

While the group are yet to obtain actual figures, the total money spent on bus lanes (etc.), is probably less than £1.5 million. Especially as only 10% of the Western Road scheme is positive for buses, with the rest of the scheme being slightly negative for bus services.

It was also understood that perhaps 29%? Of say £9 million BSIP expenditure should be allocated to capital items. If so, this £1.5 million figure works out at less than half of this allocated figure.

More importantly, this money only covers one or two years. There are no planned bus priority measures for future years, whereas the A259 Active Transport scheme may cost perhaps £6 million. This would be perhaps four times as much spent on bus priority, and is likely to be just one of many schemes.

Thirdly, it should be remembered this is almost the first significant sum spent towards helping buses in many years, whereas the council boasts about its many recent cycle (etc.) enhancement projects. While these environmental improvements can be positive, the needs of bus users also need to be respected.

Valley Gardens 3 could prove to be the most negative scheme for buses, in many years, with the LTP document inaccurately implying bus users will gain from the scheme.

Many potential bus priority schemes can also help cyclists/pedestrians and enhance the environment (especially a possible London Road and Lewes Road shopping area improvement scheme).

No wonder the council wanted to include BSIP funding, within its LTP funding envelope, because it is probable that none of these positive bus measures would have taken place without this BSIP funding, which should be another embarrassment. With the DfT national funding being cut by 5% a year, future BSIP funding could be at risk, certainly in the medium term.

Reducing bus punctuality problems: It has been noted that the main document also omits information about deteriorating bus punctuality.
This non frequent bus service punctuality figure has fallen from 89% in 2011/2 to 75% in 2023/4; in the face of traffic congestion, minimal new bus priority, and road-works.

It is good that the council is trying to reduce these problems. However, instead of trying to eliminate the congestion problems at source, with bus lanes and other priority measures; the chosen solution has been to add extra buses on a route. While the bus companies have been forced to adopt this costly solution, the council does have a choice.

Whereas providing a bus lane is a one off cost, the provision of extra buses is an annual expense. If you were to assume an extra bus costs £250,000 per year to run; over 20 years that would amount to £5 million, and that is just one bus, on one route. This figure needs to be multiplied many times for the whole network.

The council has recently used BSIP funding to finance an extra bus on each of the 24, 26 and 46 routes (totalling say £15 million over 20 years). If the council had not stepped in, this would have to be financed through higher bus fares, which passengers do not appreciate, or allowing unacceptably unreliable services to persist.

However, while a bus is more likely to turn up, adding these extra buses has resulted in more generous timetables, with buses sometimes unnecessarily waiting at bus stops to keep to the timetable. This can make the bus journey excessively slow, annoying passengers, and makes it more likely intending passengers will return to using a car. And, we thought the council wanted to encourage bus usage.

The forward capital programme beyond 2025/6 certainly does not mention Bus lanes or any other bus priorities.

Something that is mentioned (and has the potential to become a serious bus issue), is improving city centre walkability.

If this only refers to pedestrianizing St. James Street, this would not be so bad. However, when the council previously attempted to remove buses from the vital Churchill Square/ Western Road area, they tried to push buses on to the congested seafront. If that is what is intended by improving city centre walkability, that would be disastrous for the city and its bus services.

Quantifying Carbon emission reduction.

There is a risk that over reliance on the Carbon Assessment Playbook could also undermine the provision of bus services.

Firstly, it is fairly likely that the data used for this playbook is based on national averages. The city's bus network is far from average. For a start we have almost the highest bus usage, and run a number of hybrid vehicles, which further reduces the Carbon footprint of our local buses. Our bus lanes are generally in the right position, which is not always true in other areas. This tool has the potential to be quite crude, and unrepresentative. Especially as the background CCC National balanced pathway, does not give improved model choice, as a separate heading towards reducing Carbon emissions.

Secondly, the city will also soon be getting a number of electric buses, presumably using Carbon neutral electricity- so further reducing the Carbon footprint of buses.
And as the years roll by, this number of electric is likely to multiply (so further reducing overall footprint, of buses). With this plan we are looking towards 2035, so also need to look forward, with buses playing an increasingly important part.

Thirdly, nationally, the government previously suggested that three people in a small car produce less Carbon emissions, than the same people travelling by bus. This is ridiculous.

As the bus is already running, so the Carbon emissions have already been accounted for, by existing passengers. So the extra Carbon cost of having three additional passengers using the bus is tiny.

On the other hand, the entire Carbon footprint of running an extra car would need to be added to the city's total. So the suggestion that car passengers can ever produce less Carbon per passenger mile than when travelling by bus, is ridiculous.

Similarly cycling and walking may have gained over prominence in policy. When the national average Carbon footprint is utilised for comparison with buses the marginal Carbon footprint should be used instead, as it better reflects reality.

If a cyclist chooses to instead use a bus (perhaps because it is raining), then the extra Carbon produced would be minimal, because the bus is already running, and the Carbon

footprint has already been assigned to the passengers already on the bus.

The opposite is also true. If we lose a bus passenger, the Carbon footprint of the bus would remain almost the same; but use of some alternative travel modes may well add to the city's Carbon footprint.

Given the unbalanced nature of this LTP5 document; which does not recognise the essential nature of bus services to the city; it is difficult for Brighton Buswatch to give this Local Transport Plan our full support.

British Regional Transport Association (BRTA)
I am a member of the British Regional Transport Association (BRTA), which is a small unincorporated voluntary association which subject to resources, seeks to advance towards better public transport across the United Kingdom. Indeed, we are very keen to see a rolling programme of local line reopenings, rebuilds and select new builds of conventional railways for passenger and freight. We also campaign for an environmentally friendly, integrated, comprehensive, inclusive and affordable transport system including buses, cycling and pedestrian facilities.

Website: https://brtarail.com/

1. The three main items include Climate Change; Local Environmental Impacts and Transport Network Performance Issues. Active Travel(walking and cycling) is also very important.
2. Several disused railway lines should be re-opened where the old trackbeds survive plus also existing(or future) railway infrastructure improvements:
- Lewes-Uckfield;Tunbridge Wells-Eridge and Horsham-Shoreham which will all bring much-needed capacity to the Brighton Main Line. All these lines will serve areas with housing developments.
- BML2 - Purley - Elmers End (including spurs at Edenbridge), and then Lewisham - Stratford.
- A curve should be built at Arundel linking the Mid-Sussex Line with the Coastway Line.
- The Wealden Line and the Marshlink Lines should both be fully electrified.
- The Polegate-Stone Cross curve should be re-instated to allow through Brighton-Ashford/Hastings rail services, plus links with wider Kent and the Channel Tunnel(and vice versa) . It could also include possible freight benefit(including Channel Tunnel/Newhaven/Shoreham/Portsmouth/Southampton). Meanwhile the A259 South Coast(Brighton-Eastboune) along the west approach of Seaford Exceat Bridge with narrow links is causing pedestrian/cyclists creating traffic flows with vehicles, together with climate change impacts and would discourage active travel such as walking and cycling. Furthermore 1500 new homes in Newhaven and 500 in Seaford would benefit for this new rail link.
- A new railway line linking Gatwick with the Redhill-Tonbridge line is needed to enable direct trains between Kent and Gatwick Airport and will also bring capacity to the M25.
- Haywards Heath-Horsted Keynes - to connect with Bluebell Railway.
- Gatwick Airport Station upgrade.
- Croydon bottleneck.

3. Delays caused by congestion in your city are one of the highest outside London
4. Pavement parking is very high in your city.
5.More direct train and bus services to key destinations such as protected buildings and landscapes, including the South Downs National Park.
6. More trains and buses on Sundays
7. Raised kerbs for bus stops to encourage disabled people
8. All new trains should have level boarding, and that station platforms need to be adjusted. Also non-visible disabilities such as autism and dementia need to be addressed.

9. All operators should be joined with Southern Railway's KeyCo. smart card initiative, with rail fares with bus trips added on at both ends of the journey.
10..Requesting free and subsidised train and bus fares for all young people 18-30 years.
11. Rolling out under-65s concessionary bus passes would boost ridership making the case more for retention of bus services
12.Retrofit low-carbon engines to existing bus vehicles
13.Electric cars can still emit 2.5PM particles thereby shifting towards public and community transport.
14. Trams and light rail schemes could help deliver a sustainable transport network.

Bristol Estate Leaseholders and Tenants Association (BELTA)
Areas like Bristol Estate suffer from two main challenges, firstly, the geographical location, being at the top of the steepest hill in Brighton, compounded by a limited bus route, creates an access issue to many residents to vital services, such as the nearest GP surgery (Over an hour via public transport).

Secondly, the hospital provides a unique challenge as traffic flow is important in and out, and currently, it doesn't follow the typical design of other hospitals, such as Red Routes on the hospital approach to prevent impediment of emergency medical vehicles.
A common criticism received when talking about road design is that it doesn't always follow good, logical design, or typically has some major flaws in how it would be implemented. For example Kingsways road-based cycle lane, next to the pavement-based cycle lane, doesn't add to a cyclists capacity to travel, but on balance negatively affects motorists.
Red Routes tend to be unpopular by nature, but they do have a very strong effect on clearing traffic from those areas so far. Residents have stated that they are quintessential to keeping hospital routes open and clear, and to prevent loopholes from double yellow sections.

CPRE Sussex, the countryside charity
It's right that the plan aims to encourage active travel and public transport, and to cut carbon emissions.

But we're concerned that the actions proposed are insufficient to deliver these bold ambitions - and there is little vision about the potential for creating better places if we take cars out of more of the city centre, and worrying little attention paid to the impact on the urban fringe and our precious countryside.

If we're to deliver on climate, air quality and congestion, and to create spaces for people, we need to see private car use falling in the city - while ensuring that protections are in place for people who need to use cars, and decarbonising the car use that remains.

Shifting journey use to active travel and public transport will likely need bolder policies around Low Emission Zones, a reduction in parking places in the urban centre and so on, and the reallocation of 'road' space to other uses (walking/wheeling, places for sitting, pocket parks and green infrastructure, etc). Charging measures are likely to be needed to generate the funding for transport alternatives.

We remain unconvinced that Park and Ride will deliver on critical transport aims. A recent evidence review on Park and Ride found that it increases car kilometres travelled and has a negative impact on modal split – i.e. Park and Ride means people use their cars more, rather than less. Https://www.climatexchange.org.uk/wp-content/uploads/2024/02/CXC-Reducing-car-use-through-parking-policies-August-2023.pdf

Furthermore, we would strongly object to the creation of Park and Ride sites that have a negative impact on the National Park or its setting, or on the urban fringe or green spaces.

We would support local neighbourhood hubs if they are combined with other transport policies that encourage modal shift towards active travel and public transport, and reduce overall car use.

East Sussex County Council
We support initiatives and interventions that help improve journeys for businesses, residents and visitors between the local authority areas of East Sussex and Brighton and Hove. This is particularly given the close relationship between Brighton and our coastal communities of East Saltdean, Telscombe, Peacehaven and Newhaven, and also those that use the A27 corridor to access the city from Lewes and central East Sussex.

You may wish to draw attention to keeping the city connected. Brighton has a thriving visitor economy, and connectivity by road, rail, air (Gatwick) and maritime (proximity to Newhaven, Shoreham etc.) is important to ensure visitors and goods can get to/from the city. We have learnt through our recent consultation on the draft East Sussex Freight Strategy that the movement of goods can be considered as important as the movement of people and can be overlooked or not fully appreciated. As such, there should be reference to freight beyond some references to consolidation centres. It would be useful to understand how you see freight moving around - whether that be strategic movements (most likely to/from or through Brighton & Hove, or deliveries to retailers or personal addresses, particularly in communities where you reallocate road space towards active travel. As a neighbouring authority we would be happy to work with you on freight opportunities that may benefit both residents, visitors and businesses of East Sussex and Brighton and Hove, particularly along the coast towards Newhaven and Seaford or via the A27 towards Lewes.

We are in the process of reviewing and updating our Local Cycling and Walking Infrastructure Plan (LCWIP). We would be keen to work with you on cross-border trips along the A27 and A259 to help our communities undertake active travel trips for both leisure and commutes on these corridors. We have successfully worked together before on cross border trips with the A259 bus lanes from Peacehaven to Rottingdean, which has contributed to improved bus journey times for passengers along this popular cross authority corridor, and the Falmer to Woodingdean cycle route improvement providing an active link to/from the Amex Stadium.

We note that whilst you emphasise an inclusive transport network, there is no reference to the importance of undertaking an equalities impact assessment (EqIA). An EqIA can help support the justification for interventions and initiatives and help understand what and where other challenges are for people who identify as having one or more protected characteristics. Likewise, we suggest that a health impact assessment (HIA) is also undertaken to support your strategy. When developing the East Sussex Local Transport Plan 4 (adopted October 2024), we used both the EqIA and HIA to inform the development of the strategy. We're happy to work with you and learn from any items that arise from these studies that affect cross boundary journeys between our local authorities.
We have shown support for your objectives where they align with the fourth East Sussex Local Transport Plan (adopted October 2024), and any support is focused on cross-boundary connections, rather than specific considerations elsewhere in the city. An inclusive transport network is a key strand of our Local Transport Plan and we welcome that within yours, as this will support cross boundary journeys for all users. We support the principle of increasing the number of public transport trips that cross the border between our authorities along the A259 ('Coaster' bus services) and A27 ('Regency' bus services and rail route) corridors. We note the reference to park and ride at Falmer and would welcome further study / information into this aspiration/proposal to ensure that any park and ride opportunity does not extract existing cross-border public transport trips from the Regency bus routes (28/29/29a) between Brighton and Lewes (with direct through links to other large towns in

East Sussex) or train services between Brighton and Lewes (with direct through connectivity to towns along the coast as far east as Ore). Any extraction from the existing public transport offer would increase private vehicle use within East Sussex, bringing its own challenges for our authority and only benefit Brighton and Hove in terms of public transport trips, when users transfer to a park and ride offer. We note the scale and ambition for expanding your EV charging network. It would be beneficial to understand how you plan to deliver the 100 rapid chargers and whether you need any support from the private sector. We would also welcome references on how you will meet the increased electricity demand and how the grid will cope or renewable energy will be used. In developing the fourth East Sussex Local Transport Plan, we established that modal choice was important for our communities, both urban and rural. Whilst we appreciate the challenges that Brighton and Hove faces are different to those faced by East Sussex, we feel it is still important to provide cross-boundary modal choice of people travelling between our geographies. The public transport (bus and rail) networks are focused on the A259 or A27/A270 corridors into Brighton, with people requiring a change of bus or train to continue to communities in Hove or north Brighton, which adds journey time, making these modes less competitive against the private car. Modal choice is important for residents, visitors and commuters who have limited modes available to them for a variety of reasons including disabilities and other commitments where their needs are not met by shared or active transportation modes.
We have chosen not to rank your projects to achieve your objectives, as we appreciate that these are matters that largely impact the city of Brighton & Hove. That said, we support initiatives and interventions that support cross boundary journeys by all modes (walking, wheeling, cycling, bus and private vehicle).
With regard to Sussex Coast Mass Rapid transit, this is something that is not explicitly mentioned in LTP4. We refer to these as bus enhancements and faster rail journeys. Both rail and bus provide mass transit opportunities at present with turn up and go frequencies (up to every 15 minutes) between Brighton and Lewes (by bus and rail) and along the A259 (by bus to Peacehaven, Newhaven, Seaford and Eastbourne). Furthermore, the term mass rapid transit often evokes visions of light rail (tram) or heavy rail modes (train) within the UK, and there is a need to undertake further studies to understand what this ‘mass transit’ intervention could look like.

East Sussex Fire and Rescue Service
Challenge 1 stated there were 146 serious injuries or deaths by collision recorded in 2023. The prospect of the road safety action plan to reduce the number of KSI's sounds timely as BHCC are heavily promoting to increase the volume of cyclists by providing additional parking and a suite of schemes as detailed in the transport plan.

A core response function statistically of the fire service is for rescue activity's related to RTC's (road traffic collisions). The plan does not demonstrate a proportionate strategy to cope and protect the increase of cyclists BHCC are promoting. The project "improving safety" under objective "deliver a safe, inclusive and integrated transport system" does not outline what risk mitigation BHCC hope to employ. With reference to figure 13, it would appear this is a community driven scheme rather than infrastructure enhancements. While education for road users is important (as currently delivered by the bikeability scheme), this is not as effective as physical controls. We would urge you to consider what physical controls can be implemented throughout the city road network to better protect this group of vulnerable road users.

Challenge 3 - For consultation purposes, ESFRS hope to collaborate and see BHCC demonstrate a robust plan to manage EV risk when setting out to achieve its carbon neutral goals. While BHCC have stated they are currently developing a separate and dedicated electric vehicle charging plan, on the consultation homepage BHCC have stated a three-year plan to install 1600 charge points in addition to the current BHCC funded "lamp post" charging points.

It is a core requirement of each fire service to undertake a community risk management plan which forensically examines statutory requirements and local risks within a fire services core operating area through historic data and consultation. In this assessment of risk, collaborative working is key so the fire and rescue service can understand the potential risk to the public by BHCC implementing this infrastructure. HV-rapid chargers (currently in operation to support public and taxi use), increasing substation capacity's of volume change the type of risk within the city. Considering access to these risk areas and proportionate remote isolation when things go wrong is key for a quick emergency response.

While the plan is still being developed, there is no evidence of what BHCC have planned to do in respect of education for public access charging point users. Education on safe use for these points is key to reduce points of failure.

Parking - EV parking in multistorey car parks carry's a great risk in two strengths which we are confident BHCC are considering. For purpose of consultation;

1. Building collapse - EV's are heavier by design and with recent plans to increase B category licence weights to 4.25 tonnes for van derived EV vehicles, compounded by a general higher volume of heavier vehicles this means multi-story carparks need to have a robust assessment of what structural integrity these buildings can offer. Building owners (private or LA) must manage the safe working loads of said structures robustly to prevent a building collapse.
2. Fire - fires in multistorey car parks are very challenging to manage with a standard ICE vehicle (internal combustion engine) EV powered vehicles are extremely volatile which ramps up when thermal runaway begins. Fire prevention measures in buildings should be considered due to how volatile this technology is.

ELEVATE research team
On behalf of the ELEVATE research team I would like to submit research evidence including Brighton & Hove resident feedback relevant to the ‘Our City Transport Plan 2035’ consultation.

Our 5 year research project (2021-26) carried out national and local level data collection focusing on the cities of Brighton and Hove, Oxford and Leeds. We conducted national, city and neighbourhood-level surveys to investigate interest in and use of e-cargo bikes and other e-micromobility modes. Our focus neighbourhoods in Brighton and Hove were Preston Park and Hove Park. A major part of the research involved loaning e-cargo bikes to 49 households (15 in B&H) living in our study neighbourhoods for one month during summer 2023 and to 11 of those households (4 in B&H) for a further 6 months the following winter. Our findings show that e-cargo bikes represent a realistic and desirable form of mobility, with the potential to reduce car use and associated emissions.

Historic England
Historic England would support solutions and programmes that minimise the impacts of transport on the historic environment, heritage and townscape and that seek solutions that deliver long-term environmental benefits. We would also support integration of transport solutions into streetscape and the public realm, particularly in historically sensitive locations such as conservation areas and within the setting of listed buildings and other heritage assets (e.g. registered parks and gardens).
Historic England’s guidance on public realm in historic locations, ‘Streets for All’, which has been developed in conjunction with the Department for Transport, includes practical case studies and can be viewed at: https://historicengland.org.uk/images-books/publications/streets-for-all-south-east/.

Historic England welcomes the opportunity to comment on the City Transport Plan due to:
• the role the historic environment can play in influencing a plan's objectives, as for example enhancing public realm in historic centres and streets;
• the potential direct and indirect impact of a plan's proposals and programmes on historic remains, features, sites, townscapes, and landscapes; and
• the opportunities for new transport measures to promote and enhance access to and enjoyment of the historic environment.

Hove Civic Society
The Trustees of Hove Civic Society have considered the consultation documents for the City Transport Plan 2035 and make the following comments:

There is much to commend in the consultation document, here we comment on those matters that we feel need to be improved.

Land grab by increasingly larger vehicles
The Transport Plan consultation document is silent on the central issue of land use and the growing space requirements of cars. The growth in length, width and weight of cars, not least the electric vehicle fleet, puts an increasing pressure on our streets and makes traffic movements and road safety more difficult. New cars are increasingly too large for standard parking spaces, extend into the highway and take excessive space from adjoining parking spaces. The growth in vehicle sizes in effect reduces car parking availability.
In this context we are deeply concerned about the continuing development of vehicle cross-overs across pavements, parking in front gardens and conversion of private green areas throughout the city for parking purposes. This trend undermines efforts to green up the city. It is an issue that affects both transport and city planning.
We would urge the council to look at the land use impact of these developments – an effective "land grab" – and look at solutions to deal with this. We cite the efforts of the city of Basle that has varying parking fees according to the size of cars, where only the smallest cars are charged a normal fee with larger cars double and very big cars treble parking fees. Regrettably some of the largest and heaviest cars on the road now are electric. One way of compensating for that additional pressure would be to remove an existing adjoining parking space for each electric charging point and landscape it. This would demonstrate that electric vehicles are not just a substitute for traditional vehicles but that they signify an environmental change, which brings a more sustainable environment with it.

Better balance between investment for car-based and other modes of transport
As set out in the consultation document, transport planning should contribute to net-zero policies, health considerations and equality considerations. Most importantly, we believe, it should also reflect the makeup of transport users and transport modes in the city and give appropriate attention and budget to the approx. 40% of households in the city that do not have access to a car. Walking is an important mode of transport!
We should create a better balance between policies for cars and walking and cycling - especially in our inner urban areas with the emphasis swinging towards the more sustainable modes of transport.
This means for example: better and wider pavements at the cost of reduced car parking.

Transport planning can help create a greener city
We would suggest that any highways work such as widening of pavements or other "build outs" should by default optimise landscaping and new trees. The cumulative impact of such a policy would over the years fundamentally improve the climate resilience of our built-up areas without adding significantly to costs. We would also suggest some creative thinking - coupling this approach with the requirements for biodiversity net gain for new developments, helping to secure funding for greening up including rain gardens and associated maintenance.

This might require some changes in the City Council's highways' contracts and also in the procedures leading up to approval of highways projects. In essence we believe all improvements to ground surfaces in the city should by default be heavily influenced by landscaping advice.

Explicit recognition of transport planning provisions in the Hove Station Neighbourhood Plan
We draw your attention to the need to recognise the policies and provisions for transport in the Hove Station Neighbourhood Plan which are set out below. The plan is a statutory document which has been subject to exacting public consultation requirements including a public referendum.

Other comments
Once again we make the plea for plans to improve Church Road (our own Hove Boulevard) to be accelerated, as a demonstrator for more sustainable urban living.
And we would welcome your suggestions, albeit at an embryonic stage, for a Sussex Coastal Mass Transit.

Living Streets Brighton and Hove
The city is still poor on pedestrian safety. Vehicles are given priority in terms of access and speed. This is in spite of walking (and wheeling in wheelchairs etc) being the universal mode of transport, and the most vital for the poorest and most vulnerable in society.
New technology is unlikely to help pedestrians.
There is a lot to admire in the objectives and principles of the Plan. The only serious omission from our perspective is the lack of detail on proposals to improve the walkability of the city, especially safety.
Our City Transport Plan 2035 – Response from Living Streets Brighton and Hove

We welcome the opportunity to contribute to the development of Brighton & Hove City Council's Transport Plan 2035 (LTP5). We were actively involved in earlier drafts of the Plan in 2021.

Living Streets Brighton and Hove1 is primarily concerned with creating safer, cleaner, greener streets and neighbourhoods to create a better walking environment and inspire people to walk more. We have therefore only commented on issues for walking (which we always mean to include wheelchairs etc.).

We warmly welcome the emphasis in LTP5 on "Enabling more people to live safer, healthier and more active lives" (Challenge 1) in view of now extensive research showing the physical and mental health benefits of walking. We are also pleased to see a focus in the objectives on delivering a safe and inclusive transport system (objective 3) and creating well-maintained streets and pavements (objective 4). We are glad that Objective 5 recognises the importance of providing
active travel choices for all and excellent public spaces.

However, while there are useful suggestions in principle to support walking in the city, there is currently very little focus in the plan on practical steps to tackle the everyday problems which reduce people's willingness and ability to walk, and insufficient funding for this vital aspect of mobility around the city.

Inclusivity
There is some recognition in the Plan of the importance of walking in creating an "inclusive" transport system. The Plan recognises that "20% of households in the lowest income bracket typically make the most trips on foot and are the only income group that make more walking trips than car trips" (page 27). It also states that while feedback on the ease of use of

pavements and footpaths by people with disabilities is in line with the national average, at 41% this is a low overall score (p28).

As the Plan makes clear, “A transport network that prioritises walking and bus users is one that makes it more inclusive for all” (p28). In spite of the recognition of the importance of walking, especially to the poorest and most vulnerable people, the only specific measure to improve the situation mentioned in the Plan is dropped kerbs at crossing points, which is very disappointing.

Pavement obstructions
There is welcome recognition that “Better pavements in the city, that are free of obstructions” help make walking an attractive option (p19). However, the Plan does not spell out what these obstructions may be, nor include any proposals for dealing with them. As we pointed out in our earlier input to the development of this Plan, pavement obstructions include pedestrian guard railings, wheelie bins on the pavement, communal bins blocking crossing points and sight lines to avoid oncoming traffic, excessive signage – almost always for motor vehicles - which blocks pavements, traffic signal control boxes, electric vehicle fast charging boxes and associated signage and pavement parking. There is not a single mention in the Plan of any of these issues, although there are plans to extend EV charging points.

A very simple, inexpensive and immediately noticeable action would be removing the pedestrian guard railings at road crossings and elsewhere (often apparently installed for no apparent reason). There is now clear evidence that removing pedestrian barriers significantly reduces collisions: a fall of 56% in pedestrians being killed or severely injured (KSI) and a fall of 48% in the number of all KSI collisions - https://content.tfl.gov.uk/pedestrian-railings-removal-report.pdf. It would make a major contribution to creating safe and welcoming streets to remove all pedestrian barriers across the city as a priority. Removing them would show residents and visitors alike that the city welcomes people walking.

All obstructions on pavements are dangerous and discourage people from walking – people are so often forced off the pavement into the road simply because the pavement has become too narrow to use safely.

We recognise that it is part of the character of much of the city that we have narrow streets with narrow pavements. That is part of the charm and attractiveness of the city. But the lack of any strategy to tackle obstacles on pavements for people walking – especially those in wheelchairs, pushing buggies, children, those who have disabilities and/or visual impairment, or
are just elderly and more anxious about falling and more likely to be seriously injured in a fall – is simply no longer acceptable in our city.

Safety and funding
We welcome proposals for a new Road Safety Action Plan that “sets out targets on reducing casualties on our roads and what actions we will take to achieve this” (p16). Unfortunately, there is no further information about what this might cover, nor how this might affect pedestrians beyond a mention that it will include an “annual programme of accessibility improvements for pedestrians”. We very much hope there will be sufficient consultations with all the relevant
groups to develop this plan, including ourselves, so that the benefits to pedestrians are fully considered as well as those to cyclists and drivers.

We are also pleased to see that the Safer Better Streets programme is ongoing, part of meeting Objective 4 to “Create well-maintained streets and pavements” (p30). However, we note that almost all the proposals focus on roads, except for the final sentence which promises to “ensure that pavements on the most important active travel routes are

considered in the maintenance schedules" (p34), our emphasis added. This is really not sufficient attention to the importance of maintaining pavements in creating safe and attractive routes for people to walk.

The lack of importance in the Plan of pavement quality and the needs of pedestrians is amplified by the budget allocations under this objective: £415,000 for Safer Better Streets; £3,950,000 for carriageway maintenance. This is in spite of an increase of central government funding for maintaining roads and pavements for 2025/6 of 83%, to a total of £5.3 million. It seems that the maintenance of pavements will receive only a tiny fraction of that funding, in spite of their importance for everyone in the city.

Finally in terms of safety for pedestrians, we note that there are no proposals to reduce speed limits throughout the city. The Plan says that "Most of the city's residential roads are now 20mph" (p13), emphasis added. This is a surprise given that it has been very difficult in the past to find detailed information about which roads are actually 20mph.

No new roads have become 20mph since the last review in 2015, since when the case for reducing the speed limits in towns and cities has been widely accepted in terms of safety, and 20mph default speed limits are now used in urban residential areas throughout the UK. The problem with the situation in Brighton and Hove currently is that there is very poor enforcement of speed limits
and dangerous driving, and the use of 20mph speed limits is extremely piecemeal, with drivers being unsure of which roads have this speed limits.
We recognise that lowering the speed limit is not an immediately popular move politically but, given the benefits of lower accident rates, fewer deaths and fewer and less serious injuries caused by speeding traffic, we suggest that things must change. People are put off walking because of fear of dangerous driving as the Plan recognises: "fears about road safety are a significant barrier
for many people adopting more active travel" (p4 and p19).

The last review of a city-wide 20mph speed limit was in 2010 and a great deal has changed in Brighton and Hove over the past 15 years. It is clearly time for another review.

Looking forward
Finally, we are very pleased to see that the focus of the "next major scheme" to improve travel and transport in the city will be to "deliver city entre walkability and accessibility improvements", focusing on key locations such as "routes between the train station and the seafront" (p7 and p35). This will be a very welcome development.

We look forward to hearing more in due course about that walkability scheme among other improvements and hope that we can assist in the development of specific proposals.

the carers centre for brighton and hove
When targeting accessible, inclusive transport, it is important to include people whose mobility is so limited that they require door-to-door accessibility

Metamorphosis Art Group and The Flamenco and Spanish Group
People who drive vehicles cannot afford electric ones. Only very few can. So over supplying electric charging machines which will add pavement furniture when far fewer electric cars than catered for will be using these machines, will be both an obstruction, causing injuries with leads everywhere for disabled and pedestrians, and a waste of money. You can only put these machines in designated out of town locations which are purpose built so as not to cause possible tripping injuries or obstructions for pedestrians and mobility vehicle users. Don't over compensate because you think we should be using all these electric vehicles and yet won't be, in most cases.

Very few will use driverless cars. The road system needs to be taken back to its pre 1980s system whereupon all side roads from the Level to the seafront were both way traffic so traffic could filter in and out and we did not have that huge queue down the centre of Brighton, as no one can exit side roads easily. The problems arose when the Council decided to put in the bus contraflow system from the seafront up towards London and Lewes Road and blocked many of the side roads off and made many on way. All this encouraged was traffic unable to exit and join and having to go all around a long one way system to get to where they wished through he side roads. Adding the bus lanes on ancient roads built for horses and carts was not practical and unviable. You cannot squeeze large trucks, bikes, buses and other transport all into one lane in many cases, without creating standstill and bottle necks. Subsequent road planners have each made a pig's ear of their "improvements" as they had a poor design to start with. The traffic used to run like a Scale Electrix track figure of 8 where the crossover for all traffic was at St. Peter's Church in both directions. Traffic all ran down the left hand road to the Steine using both lanes and then curved around at the bottom of the Steine and all traffic came back up on the western side of the road. The London Road and Ditchling Road were two way to all traffic. The main bus depot and waiting room and toilets for the drivers and conductors were at the Steine. This meant visitors as well as residents could easily access most of the buses from the seafront in both directions coming and leaving town.
There is NO money for vanity projects which usually don't work (i360 comes to mind when the public said waste of money beforehand).
Just concentrate upon a clean and well run and maintained road and transport system without adding too many bells and bows, which never work and waste money.

National Highways
We are concerned about the safety, reliability, and operational efficiency of the Strategic Road Network (SRN), in this case the A27 and the A23.

We have reviewed the Plan.

We would like to highlight that in in terms of national transport policy, you need to be mindful of the Department for Transport's (DfT's) Circular 01/2022 'Strategic road network and the delivery of sustainable development' (December 2022) which is the government's policy for the SRN: **https://www.gov.uk/government/publications/strategic-road-network-and-the-delivery-of-sustainable-development/strategic-road-network-and-the-delivery-of-sustainable-development.**

This sets the policies and priorities for the SRN. It emphasises the need for a vision-led approach to development that manages down traffic impacts by promoting sustainable and active travel and internalising movements for larger developments. This vision-led approach to development now features in the government's National Planning Policy Framework (NPPF): **https://www.gov.uk/government/publications/national-planning-policy-framework--2.**

There is also the government's Road Investment Strategy (RIS) which sets the priorities for investment in the SRN. RIS 2 concluded in March this year. RIS 3 will cover the five-year period from 2026-2031. The government published the interim settlement for 2025/26 in March this year: **https://www.gov.uk/government/publications/strategic-road-network-interim-settlement-2025-to-2026.**

We are drawing this to your attention because the interim settlement is clear that for RIS 3 the focus will be on maintenance and renewal of the existing network (see para. 4.3). Not all schemes listed in the Pipeline in RIS2 and considered during Road Period 2 will be progressed as Pipeline schemes in the next road period. An updated list of Pipeline schemes will be published in RIS3.

Given this context, we welcome the promotion of sustainable and active travel. This can help support a shift away from the car as the main mode of transport which can help alleviate pressures on the roads, including the SRN.

The Carers Cantre for Brighton and Hove
When targeting accessible, inclusive transport, it is important to include people whose mobility is so limited that they require door-to-door accessibility.

Transport Action Network
Please see below for my comments on Brighton & Hove's Local Transport Plan to 2035.

Overall there is much to commend in the plan and I broadly welcome its priorities and focus to make a more equitable and fairer transport network, to reduce transport's negative impacts and to make it more attractive to travel in the city.

However, there are some serious issues that are not addressed, or only partially addressed, which need greater thought if the 5th LTP is to deliver the changes required.

Key issues with the LTP include that it appears to give no consideration of:
1. A Vision Zero approach to road safety
2. The need for greater adaption measures for climate change - the need for more shade from street trees and greater SUDS for example - where is the strategy to reduce on-street car parking to enable this?
3. Demand management measures particularly with regards to cars entering the city, such as through car parking costs and numbers.
4. Park & ride's impacts on regular public transport services (rail and bus) and transport related social exclusion as well as the South Downs National Park
5. On and off street cycle parking for traffic generators and improving its security
6. Promotion of e-bikes and mobility scooters and their charging needs (it shouldn't be just about buses and cars)
7. Better spring and summer maintenance of shared paths (cutting back green growth)
8. Better autumn and winter maintenance of all pavements for the benefit of elderly people to make sure they do not become trapped indoors.
9. A full pavement review and the need for better standards for pavement widths and dropped kerbs, better bin control and action to ensure that the large rollout of EV chargers does not lead to them being placed on pavements apart from in exceptional circumstances
Below are some comments, positive and negative on the various elements of the LTP:

Challenge 1 - there is a good acknowledgment of the issues but the key omission is any clear ambition to reduce casualties to zero, i.e. there is no mention of Vision Zero and of designing out road danger at a systems level. This is important if we are to drive real change to reduce the number of people killed and seriously injured on our streets. There is also the wrong categorisation of incidents as accidents.

Challenge 2 - welcome the acknowledgment that buses and cycling can improve traffic flows and are more efficient ways of moving large numbers around the city. While it is acknowledged that building wider roads just increases traffic, this is also true for other ways of increasing capacity/improving flow such as more efficient signalling. In addition, while parking in the centre remains attractive with many thousands of parking spaces, people will continue to drive there. In short some demand management measures will be needed to achieve the desired outcomes.

The idea behind the mobility hubs is sound but it would be useful to understand how many are envisaged for the city and their distribution. Regarding the larger park & ride sites, it is

disappointing to see this being pursued yet again when it wastes so much time and energy and delivers very little. None of the downsides of park & ride, such as how it undermines existing public transport and only works for people who drive into the city are considered. Neither is the impact it would have on the National Park due to its location within the National Park or its setting and the increased traffic flows it would generate through the South Downs.

By undermining existing public transport it potentially increases transport related social exclusion as rural people reliant on buses (and possibly trains) will have less choice while people without a car who want to access areas outside the city are similarly negatively impacted. It would be far better to link park & ride to train stations around the region, to boost services rather than undermine them. This would create pressure on the train operating companies (around until April 2028) for better weekend services to serve visitors and tourists. Thereafter thought needs to be given as to how improvements could be achieved. However, this will only be affordable by increasing passenger numbers and not deterring people travelling by trains into the city.

Regardless of where or how park & ride is developed, without demand management measures to dissuade people from driving into the city centre, such as more expensive parking and reduced spaces, there will be few space and congestion benefits from this policy and it will likely increase car use. Only by taking out space for cars, will the city be made more attractive for visitors and residents alike.

As part of this challenge it would be good to see a long term reduction on on-street parking, incrementally delivered to enable more street trees, SUDS, EV chargers, etc, especially in the central area. Doing it in this way would enable people to see the benefits and build support for it.

Challenge 3 - It is wrong to say there is uncertainty over whether heavy vehicles will follow a hydrogen or electric path. The consensus is that electric is the way to go apart from some bespoke vehicles. Therefore the city needs to be planning on that basis. What is disappointing in this section is that there is no mention of e-bikes of mobility scooters. Both are likely to increase in use, especially mobility scooters with an ageing population, yet no thought is given as to how to provide charging for these vehicles. Given their smaller footprint and more effective use of space, they should be a priority over private cars.

Challenge 4 - transport related social exclusion will be prevalent in many areas, not just in the areas where it is most prevalent. It's not just about subsidised bus services in a few areas but better buses all over and in particular cheaper fares.

Better active travel is also important as these are low cost solutions but people are deterred from using them, particularly cycling where a perception of road danger is real disincentive.

Challenge 5 - It should be recognised fewer motor vehicles would reduce wear and tear on the city's roads and reduce maintenance costs. Fewer crashes and injuries through a Vision Zero approach would also reduce costs.

Objective 1 - fully support apart from park & ride which is likely to undermine regular bus and train services and worsen transport related social exclusion. Would also like to see greater ambition on influencing rail services especially longer term such as faster services on West Coastway to help reduce the number of cars coming into the city.

Objective 2 - Fully support, but this should include e-bikes and mobility scooters. Currently there is no consideration as to the needs of these modes.

Objective 3 - Fully support but it needs to go further and advocate Vision Zero to deliver real and lasting change. Also, the transport hierarchy needs following placing the needs of people walking and cycling at the top of all considerations. There should also be some 20mph extension, such as up Ditchling Road from Fiveways to past Varndean and the park entrance opposite, to reduce road danger. Alongside this more measures should be implemented to address areas where the 20mph speed limit is being regularly flouted.

In terms of improving accessibility to rail stations, Moulsecoomb stands out as urgently needing attention, especially because of its importance for students and staff working at the University of Brighton.

Objective 4 - Fully support but this would benefit from traffic reduction measures and making the link would be helpful here.

Regarding cycle routes and shared paths, there needs to be better maintenance of plant growth in spring and summer that reduces the usable width of routes pushing people walking, wheeling and cycling into conflict. This needs to be better managed than at present. Routes most affected include those in less central areas. In terms of surfaces, the Level is extremely poor.

Regarding pavements, the removal of leaves and ice needs to be prioritised where there are more older people as falls by the elderly can be terminal, even if not immediate. This means considering more than just priority central areas. At present it is often safer for people to walk in the road, even if this exposes them to other dangers and of course many elderly people won't do this, so in effect can become trapped indoors.

Objective 5 - Fully support but this needs to go further to commission a full pavement review and revise standards to be more inclusive. A 2m width should be the minimum width considered for new pavements as with lamp posts, signs and bollards this is reduce down to around 1.5m. That's before considering the impact of A-boards, bins and other obstructions such as EV chargers. Regarding the latter these should be banned from pavements unless the pavements are wide enough to leave a 2m clear width with the charger installed.

Dropped kerbs should be 2m as standard for greater inclusivity. 1.2m and 1.6m are not wide enough to comfortably allow people to cross at the same time in opposite directions, and often don't reflect the width of the pavement either (see the A259 proposals).

On street cycle parking for destinations such as shopping areas, gyms, supermarkets, hospitals, needs to be part of the plan yet is not mentioned despite, for example, the cycle parking at the Royal Sussex County Hospital being virtually full up most of the time. It also needs to be more secure so that people can be sure that they will find their bike still there when they return. Combining this with e-bike charging also needs to be considered. Otherwise without better and more cycle parking the current situation risks being a constraint on increasing the numbers of people cycling.

Finally, there has been no mention of the need for adaption at a time of increasing climate change. One of the key things that will be needed in the future to keep people walking is more shade from street trees. Also there is a need for more SUDS to reduce water run-off during heavy rainfall. Removal of some on-street parking will be essential to enable these features.

Objective 6 - Fully support but would urge caution over autonomous vehicles and the potential negative impact they could have for people walking and cycling.

I trust these comments are helpful and I am happy to follow up with further comments or evidence if needed.

Transport for South East

1. Introduction

This document is the draft Transport for the South East (TfSE) response to the consultation on the Brighton & Hove City Council's draft 'Our City Transport Plan 2035'. This is a draft officer response that will be presented to our Partnership Board in January 2025 for approval. A further iteration may therefore follow.

TfSE is the sub-national transport body (STB) for the South East of England. Our principal decision-making body, the Partnership Board, brings together representatives from our 16 constituent local transport authorities, district and borough authorities, protected landscapes, business representatives, National Highways, Network Rail and Transport for London.

We have a vision-led Transport Strategy in place to influence government decisions about where, when and how to invest in our region to 2050. Our Strategic Investment Plan (SIP) provides the delivery framework for this strategy, setting out the infrastructure and policy interventions needed across the region over the next three decades. This is in the process of being refreshed.

TfSE welcomes the opportunity to respond to the consultation on the draft 'Our City Transport Plan 2035'. We trust that our response will add value to the development of the City Council's plan and form the basis for continued engagement as we strengthen the 'golden thread' between the local and regional strategies.

2. Approach

The draft 'Our City Transport Plan 2035' is structured around six objectives and a set of guiding principles reflecting active and healthy travel, efficient road networks, the transition to zero-emission vehicles, inclusive access, and well-maintained streets. This approach is closely aligned with the principles underpinning TfSE's Transport Strategy. Both emphasise evidence-based prioritisation, integration of transport with wider policy areas, and the need to balance economic, social and environmental outcomes in decision-making.

There are several common elements in the way the two documents have been developed. Each draws on the 'avoid–shift–improve' framework, promotes a 'Movement and Place' approach that balances the movement of people and goods with the role of streets as public spaces and incorporates aspects of 'Triple Access Planning' which integrates physical mobility, digital connectivity and spatial proximity in access planning. Both documents also support data-led monitoring to inform investment decisions.

3. Vision

The vision in the Brighton & Hove draft LTP5 is strongly aligned with the 2050 Vision in TfSE's Transport Strategy. Both commit to a low-carbon, inclusive and accessible transport system that enhances quality of life and supports sustainable economic growth. The shared emphasis on reducing emissions, improving connectivity, and creating healthier places provides a robust foundation for partnership working. Table 1 below sets out the alignment between the two vision statements.

Table 18: Alignment between the 'Our City Transport Plan 2025' and the 2050 vision in TfSE's Draft Transport Strategy

'Our City Transport Plan 2035' Vision	TfSE Transport Strategy 2050 Vision
A transport system that enables everyone to move around and access what they	Our vision is for the South East to offer the highest quality of life for all and be a

need easily, affordably and safely, while improving health and wellbeing, reducing carbon emissions, and enhancing the city's environment and economy.	global leader in achieving sustainable, net zero carbon growth. We will develop a resilient, reliable and inclusive transport network that enables seamless journeys and empowers residents, businesses and visitors to make sustainable choices.

4. Alignment between Brighton & Hove Objectives and TfSE's Missions

Table 2 presents an assessment of alignment between the objectives of the 'Our City Transport Plan 2035' and the five missions of TfSE's Transport Strategy. The analysis shows strong overall alignment, particularly in relation to decarbonisation, inclusion, and sustainable growth.

Table 2: Alignment between objectives of ‘Our Transport Plan 2025’ and TfSE’s five Missions

Brighton & Hove ‘Our Transport Plan 2035’ objectives	TfSE’s Missions				
	Strategic Connectivity	Resilience	Decarbonisation	Inclusion & Integration	Sustainable Growth
1. Increase the use of public transport and active travel.	X		X	X	X
2. Support the transition to zero-emission vehicles.			X		
3. Ensure safe, inclusive and affordable transport options for all.			X	X	
4. Maintain streets and public spaces to high standards.		X			X
5. Integrate transport with new housing, jobs and regeneration.	X			X	X
6. Harness technology and data to improve travel and reduce emissions.	X		X		X

As shown in Table 2, the objectives of ‘Our Transport Plan 2035’ are broadly consistent with TfSE’s missions. Notably, the emphasis on mode shift and zero-emission vehicles supports TfSE’s Decarbonisation Mission, while the focus on inclusion and accessibility aligns with the Inclusion & Integration Mission. The Council’s approach to technology, data and public realm improvements complements TfSE’s Resilience and Sustainable Growth missions.
TfSE welcomes the clear recognition in ‘Our City Transport Plan 2035’ of the regional role played by Transport for the South East and the inclusion of both the TfSE Transport Strategy and the Strategic Investment Plan (SIP) to demonstrate alignment with regional priorities. The Plan usefully reproduces the TfSE Strategic Investment Plan map, illustrating the alignment between Brighton & Hove’s local priorities and the wider regional network. It also identifies several shared priority schemes, including the Sussex Coast Mass Rapid Transit (MRT) concept, Brighton Main Line resilience and capacity improvements, A27 and A23 corridor enhancements, and the strategic mobility hubs proposed at Falmer, Shoreham, and the A23/A27 junction.

There is scope to strengthen the alignment between the two documents by referring to a small number of additional schemes from the Strategic Investment Plan that are directly relevant to the city’s wider connectivity. These include the A27 East of Lewes to Polegate improvements, which would enhance east–west resilience and improve access between

Brighton and Hove, Eastbourne and the wider coastal area; and the West Coastway Strategic Study, which aims to reduce rail journey times between Brighton, Lewes, Eastbourne and Hastings. Reference could also be made to the proposed additional platform at Brighton Station, which will increase capacity and improve the reliability of services to and from the station and the reinstatement of direct Cross Country services between Brighton, London and the Midlands to reduce journey times for long-distance travelers and support inbound tourism. Finally, reference to TfSE's electric vehicle charging infrastructure and wider decarbonisation work areas, in which the City Council has already been involved, would further demonstrate consistency with regional initiatives to reduce emissions.

Recognising these additional linkages would give a more complete picture of how Brighton and Hove's proposals fit within the wider regional investment framework and would help strengthen the case for future joint funding and delivery.

5. Conclusion

The draft 'Our City Transport Plan 2035' demonstrates a strong alignment with TfSE's Transport Strategy, notably through its recognition of the role of the Transport Strategy and Strategic Investment Plan. TfSE welcomes this clear acknowledgement of the regional context and the City Council's commitment to collaboration on future investment. There is an opportunity to build on this by incorporating explicit references to several regionally significant schemes beyond the city boundary, which would further anchor Brighton & Hove's proposals within the regional investment framework. Doing so would underline the City's contribution to delivering a resilient, inclusive and net-zero transport system for the South East.

University of Brighton

These challenges are accurate and are supported by UOB.
Accessibility is a current barrier to sustainable travel at our Moulsecoomb campus, with the train station being inaccessible to wheelers and those with mobility challenges. We have worked hard and continue to make our campus more accessible and the train station access is a significant barrier.
Challenge 5 is a significant challenge to uptake of active travel and cycling in particular. The adoption of red routes across the city has had a significant, positive impact and have been welcomed by our cycling community.
Cost and accessibility are the biggest challenges to uptake of sustainability transport modes. Our annual travel survey highlights costs and convenience being the two driver factors of mode share choice. A bigger emphasis on addressing public transport costs and physical public transport facilities would strengthen the action to address these challenges

Renew Preston Village Campaign

Renewing Preston Village presents a prime opportunity to develop a Neighbourhood mobility hub and deliver upon 4 of 6 CTP 2035 objectives.
At General Council on Thursday 10th July 2025, Cllr Trevor Muten requested that the Renew Preston Village input into the City Transport Plan.

Renew Preston Village are calling for changes consistent with our campaign material (as available at www.prestonvillage.org) to be included within the 2035 City Transport Plan.

The following has been compiled by the local resident team leading the campaign.

A copy of this document including supporting images will be sent to Cllr Trevor Muten directly on email.

Overview and introduction

Renew Preston Village is a campaign group supported by 1,500 residents, 19 businesses, two churches, one school and a range of community groups including Friends of Preston Park and The Brighton Society.

Preston Village is one of the oldest neighbourhoods in Brighton and Hove - it is the original gateway to the city and it is rich in cultural heritage and local identity. But today, most people experience it as little more than a noisy, six-lane carriageway, wedged between a Shell garage and a Sainsbury's Local on the A23.

Renew Preston Village is campaigning for changes which are deliverable under existing City Council policy so that Preston Village can once again become a thriving, walkable, and welcoming part of our city.

Preston Village has been split in half by the A23 and suffers from limited space for walking, air and noise pollution, flooding and high traffic speeds that makes it unattractive for residents and visitors.

Renew Preston Village is campaigning for;

- Street trees and rain gardens to mitigate flooding and prevent damage to property.

- Improved crossings to create a safer environment for anyone wheeling or walking

- Protected cycle lanes and more space for pedestrians to encourage active travel and create a place for the community to gather.

- Bus stops located to integrate with local facilities.

- Parking & loading bays to support local business.

Collectively, these simple changes can begin to knit Preston Village back together and create a distinctive place that is thriving, safer, protecting from flooding, walkable and people centred.

The following 8 items sets out the case for changes to transport and infrastructure in Preston Village on the A23:

1. Rain gardens to mitigate flooding

Preston Village is in a chalk valley on the route of the seasonal Wellsbourne river which has been culverted under the A23 roadway. Poor drainage has caused 5 surface flooding events between South Road and North Road in Preston Village since 2018 which have seriously impacted business and home owners.

Renew Preston Village is proposing the installation of SUDs (Sustainable Urban Drainage) rain gardens in order to mitigate flooding as part of a wider public realm improvement. Design of the SUDs should be integrated into the wider traffic management scheme.

2. Improved crossings:

East / West across the A23;

Improved crossings with better pedestrian phasing on a 'single stage toucan format' accommodating pedestrians and cyclists would support connectivity and build a positive network effect between east and west sides of the village.

Toucan crossings would connect the Preston Park Railway Station,the pubs and shops on the west side of the A23 at Preston Village with other local facilities and attractions—Preston Manor and the walled gardens, St Peter's Church, the velodrome, cricket ground, and the wider Preston Park.

North / South across North, Middle and Lauriston Road

Renew Preston Village supports use of junction entry features such as continuous pavements or raised continuous 'Copenhagen style' crossings for the lower volume vehicle access to North, Middle and Lauriston Roads which would simultaneously improve the pedestrian safety, experience and public realm.

3. Active Travel

At present Preston Village is not recognised as a transport node in the city but with segregated bike lanes and improved pedestrian infrastructure alongside Beryl Bike hire docks, strategically located bus stops and a wayfinding link to nearby Preston Park rail services it could become a well known hub for mobility.

Renew Preston Village would support a review or study of council owned land to the north east of the A23 & Preston Drove junction which may be suitable for a relocated Beryl Bike Hire station and Southbound bus / National Express coach stop.

4. Reducing Air & Noise Pollution

Trees, rain gardens, other landscape treatments and reduced carriageway space have been proven to reduce average motor vehicle speeds by increasing 'edge friction' - the slowing effect on vehicles caused by nearby elements like trees, buildings, or parked cars along the roadway.

Reduced traffic speeds on the A23 at Preston village would correspond with Improving Air Quality and Reducing Noise Pollution

5. Supporting economic growth

Transport and the associated environmental improvements in Preston Village on the A23 could boost the local economy by incentivising more journeys on bike and on foot - both of which are proven to have an associated increase on spend per head in local shops and businesses.

Repairing links across the A23 could also support the case for new development or recreation investment at the now-vacant vicarage bowls site, support the overall visitor experience at Preston Manor and draw footfall to and from Preston Park, particularly during the summer events season.

Furthermore, reducing or mitigation of local flood risk would be a major benefit to local businesses, providing them with greater access to investment and certainty.

6. Improving public realm

The quality of public realm influences how people behave.Research shows that well-

designed, attractive streets with greenery and coherent layouts lead to more walking, less anti-social behaviour, and stronger community interaction. People are more likely to spend time, feel pride in their surroundings, and engage with others in neighbourhoods that are pleasant and well cared for, with benefits for wellbeing and security.

The transport changes outlined by Renew Preston Village would entail updates in public realm. which could help to protect and leverage the unique architectural heritage of the Preston Park and Preston Village Conservation areas. Well maintained period architecture creates a sense of history and sense of place. When combined with a high standard of public realm, unique features in the village can be enhanced and celebrated to the benefit of the local community and the visitor economy.

7. Community cohesion

Good urban design prioritises walkability, active frontages, local shops, safe public spaces, and promotes environments that support chance encounters, community events, and everyday sociability.

The pedestrian experience in Preston Village today feels very hostile, unwelcoming and inhospitable. The transport changes proposed by Renew Preston Village could have indirect benefits for the community by creating a shared communal space at the physical heart of the community where local residents can meet.

8. Events infrastructure

Between May and October Preston Park is the city's largest designated event venue with Pride, Brighton Marathon, Comedy Garden, the Thai festival and fireworks night attracting tens of thousands of visitors.

Preston Village is a key corridor and central to ingress and egress of visitors using Preston Park railway station. Infrastructure should be fit for purpose and account for the peak volume of pedestrians facilitating a safer, cleaner area, with opportunities for unlocking higher levels of spend locally from local residents and regional visitors.

General Equality Impact Assessment (EIA) – Our City Transport Plan

1. Assessment details

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

Read the EIA toolkit for more information.

Name of activity or proposal being assessed:	Replacement of Local Transport Plan 4 (LTP4) with Our City Transport Plan 2035
Directorate:	City Operations
Service:	City Infrastructure
Team:	Transport Policy & Strategy
Is this a new or existing activity?	There is existing transport policy in LTP4 but the process of writing LTP5 will be a new activity.
Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)	Yes. LTP4 and the local Cycling & Walking Infrastructure Plan (LCWIP) EIA.

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

Responsible Lead Officer:	Kieran Tayor, Principal Transport Planner
Accountable Manager:	Laura Wells, Transport Policy Manager
Additional stakeholders collaborating or contributing to this assessment:	Possability People – Get Involved Group (consultation workshop) Brighton & Hove Older Peoples' Council (consultation response)

3. About the activity

Briefly describe the purpose of the activity being assessed:

To produce a new long-term Transport Policy, which will assist the council in securing Government funding and communicate to residents, and other stakeholders what the transport needs of the city are.

Our City Transport Plan 2035 sets out the long-term strategy for the management, maintenance and improvement of the city's transport network, and a short-term implementation plan. It identifies the priorities and projects required to help people move around the city more safely, sustainably and easily.

What are the desired outcomes of the activity?

There are two desired outcomes. Firstly, the drafting and adoption of the city's main transport policy document. Secondly, that the process of drafting LTP5 involves stakeholders and that the end product has been co-produced.

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

All residents, visitors and workers will be affected to some degree, by the transport policy that the city adopts. In terms of those with protected characteristics most impacted by changes to our streets / transport network are:

- Disabled people, because the policy concerns the layout of our streets and public realm.

- Older people (because there is a high incidence of age-related disabilities).
- Young people, who have the greatest vested interests in the policy achieving the required greenhouse gas emission reductions.

Beyond those with protected characteristics defined in law other groups affected will be:

- Those on low incomes (Socio-economic disadvantage), particularly those living in outer areas of the city.

4. Consultation and engagement

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

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

A Direction of Travel document for developing LTP5 was the subject of a public consultation in 2021. This was focused on setting out the challenges the city faces and developing a vision for Our city Transport Plan 2035. The results of the public consultation were reported to the Environment, Transport & Sustainability Committee in March 2022.

This initial document, and period of engagement, formed the basis of the draft version of Our City Transport Plan 2035. We conducted a 12-week public consultation on this draft policy between 18 June and 12 September 2025. The main channel for feedback was an online survey hosted on the council's consultation portal, Your Voice. The draft policy, along with supporting documents, were available to read on-line and paper copies were available in libraries or on request. We received 500 survey responses.

Our engagement activity during the consultation period consisted of:

- A week-long public exhibition at Jubilee Library.
- Seven drop-in sessions held in 6 libraries across the city.
- Five workshops held with secondary school pupils.
- Six workshops/ meetings with stakeholders, including the Transport Partnership, Local Access Forum and a Get Involved Group organised by Possability People.

The purpose of having dedicated sessions in secondary schools was to ensure we heard from young people, who tend to be less well represented in consultation surveys.

A 90-minute workshop with a Get Involved Group, organised by Possibility People, was to ensure that the views of disabled people were also captured in the consultation. Of the 500 consultation responses there were 83 where respondents reported that they had a health issue that limited their day-to-day activities. Responses from these 83 people were analysed to see what if any differences there were from the overall responses. This was to highlight if disabled people had different priorities.

5. Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this activity? Consider all possible intersections. (State Yes, No, Not Applicable as appropriate)

The consultation survey on the draft version of Our City Transport Plan 2035 included questions that asked about gender, sex, age, ethnicity and disability. Equality questions were focused on legally protected characteristics that were felt to be most impacted by transport policy. To keep the survey concise, we did not ask additional questions about other categories, whether people were in the armed forces or had caring responsibilities for example.

We have also drawn on national, regional and local data that gives us an insight into the people's experience of transport. This is included in the evidence base for Our city Transport Plan 2035. This data relates to protected characteristics and socio-economic status. Data specifically on how the transport system in Brighton & Hove serves other groups, such as the homeless or armed forces personnel, is not available.

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

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

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

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

The answers in the table above relate to survey data recorded from the Your Voice consultation on the draft version of Our City Transport Plan 2035. In addition to survey responses our analysis, for the evidence base of Our City Transport Plan 2035, included area-based demographic and deprivation data to identify inequalities in access to transport and inform where improvements are needed. The specific issue of access to education, for children living in the east of the city who are in a single school catchment, was raised during the consultation. School entry requirements have been amended to provide greater choice, and bus services re-organised to facilitate better access. However, there were concerns raised that the affordability of transport may impact people's uptake of the changed school entry criteria. This can be monitored through postcode plotting of school intake. Consultation & engagement opportunities are always promoted to a wide range of stakeholders in the city, through different means, in order to obtain a wide range of views, particularly in terms of qualitative feedback. Good relationships have been established with many groups in the city to elicit these views which are vital to feed into policies and plans. It should be noted that the individual projects referenced in Our City Transport Plan will be subject to their own equality impact analysis. This offers further opportunities for engagement and monitoring of impacts. The 2025 refreshed Bus Service Improvement Plan involved focus groups with disabled people for example. Where an impact on a specific group from a particular project is identified (such as Armed Forces personnel, refugees, or people experiencing homelessness), their needs may be more directly addressed through delivery of these projects.

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

The plan contains key performance indicators and the individual projects within this plan will have their own arrangements for monitoring and reviewing their impact.

6. Impacts

Advisory Note:

- **Impact:**
  - Assessing disproportionate impact means understanding potential negative impact (that may cause direct or indirect discrimination), and then assessing the relevance (that is: the potential effect of your activity on people with protected characteristics) and proportionality (that is: how strong the effect is).
  - These impacts should be identified in the EIA and then re-visited regularly as you review the EIA every 12 to 18 months as applicable to the duration of your activity.
- **SMART Actions mean**: Actions that are (SMART = Specific, Measurable, Achievable, Realistic, T = Time-bound)
- **Cumulative Assessment:** If there is impact on all groups equally, complete **only** the cumulative assessment section.
- **Data analysis and Insights:**
  - In each protected characteristic or group, in answer to the question 'If "YES", what are the positive and negative disproportionate impacts?', describe what you have learnt from your data analysis about disproportionate impacts, stating relevant insights and data sources.
  - Find and use contextual and wide ranges of data analysis (including community feedback) to describe what the disproportionate positive and negative impacts are on different, and

intersecting populations impacted by your activity, especially considering for Health inequalities, review guidance and inter-related impacts, and the impact of various identities.
    - For example: If you are doing road works or closures in a particular street or ward – look at a variety of data and do so from various protected characteristic lenses. Understand and analyse what that means for your project and its impact on different types of people, residents, family types and so on. State your understanding of impact in both effect of impact and strength of that effect on those impacted.
- **Data Sources:**
    - **Consider a wide range (including but not limited to):**
        - Census and local intelligence data
        - Service specific data
        - Community consultations
        - Insights from customer feedback including complaints and survey results
        - Lived experiences and qualitative data
        - Joint Strategic Needs Assessment (JSNA) data
        - Health Inequalities data
        - Good practice research
        - National data and reports relevant to the service
        - Workforce, leaver, and recruitment data, surveys, insights
        - Feedback from internal 'staff as residents' consultations
        - Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
        - Insights, gaps, and data analyses on 'who' the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.
- Learn more about the Equality Act 2010 and about our Public Sector Equality Duty.

6.1 Age

Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: those under 16, young adults, with other intersections.	YES /~~NO~~

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

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

Transport Policy will have a disproportionate impact on older and younger people. The outsize impact on older people stems from the high incidence of age-related disability (see section 6.2). Those over 66 are also in receipt of existing transport benefits, meaning that transport policy decisions are more likely to affect them. The council spends millions each year meeting the cost of older people's bus passes.

Older people have raised the following concerns:

- accessibility and isolation issues; many cannot rely on active travel
- long distances between bus stops, lack of seafront bus service and perceived high parking charges.
- reliance on online systems (ticketing, parking permits, bike hire) disadvantages them.
- supported healthier lifestyles and clean air but warned about unsafe pavements, shared space and the cost barriers of EVs.

The outsize impact on the young stems from the fact that the surface transport sector contributes 22% of the UK's total emissions and that decarbonising this sector will be essential to mitigating the worst impacts of climate

change. Through the Bus Service Improvement Plan under 19's also receive existing benefits in the form of subsidised fares. Decisions made regarding transport policy will also have an important impact on how accessible schools in the city are (The city has recently changed the schools admissions criteria so that up to 5% of places in each of the city's community secondary schools will now be open to pupils who live in single-school catchment areas).

Despite the considerable sums spent on fare subsidies the affordability of transport was an issue that was raised by younger people, and the general population.

6.2 Disability:

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

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

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

Disability has a large impact on travel habits. Disabled people travel less than non-disabled people. In 2020 they made 28% fewer trips, and significantly more disabled people live in households without access to a car or van. National research, commissioned by Government, provides relevant insights into the challenges disabled people face[1]. Our transport policy and projects will have a disproportionate impact on this group, both positive and negative. Because of this we engaged with a Get Involved Group, organised by Possability People. The feedback we received supported findings at the national level. The needs of individual disabled people varies according to their disability. Measures we can take to improve access for one group may disadvantage others. For example level surfaces between the footway and road surface are beneficial for those in wheelchairs but can make navigating difficult for those with sight impairments who use kerbs as a guide to locate themselves.

General feedback:

- The provision of disabled parking in some key locations was not felt to be adequate. This includes the old town, where widening of pavements, has removed spaces to park on double yellow lines and where red routes have been introduced.
- Shared spaces, between cyclists and pedestrians, created a feeling of insecurity. It was felt they rely too much on social understanding; some users (cyclists, e-scooter riders) don't yield to pedestrians. This was especially the case for blind or partially sighted people.
- It was felt that there were inconsistent standards across council departments when it comes to accessibility and that there was a lack of learning from previous projects where accessible planning was not fully considered.On public transport the long gaps between bus stops on Western Road were highlighted and that there are issues with real-time tracking for certain bus services and this makes journey planning difficult.
- Consultation processes are often inaccessible, lack of notice and insufficient work done to survey opinions from people with learning disabilities — Your Voice surveys are not adequate on their own and more time and better formats are needed.
- Street clutter (like cycle parking or café/restaurants furniture) create barriers for those who rely on a kerb or building lines to navigate. Flat surfaces useful for mobility needs are difficult for blind or partially sighted people owing to use of raised curbs to navigate.

[1] UK Disability Statistics: Prevalence and life experiences
Accessibility & Inclusivity of bus and coach
Disabled people's experience of rail
People with non-visible impairments' attitudes and experiences of transport qualitative research
Evaluation of the Inclusive Transport Strategy

Feedback related to wheelchair users:

- Newer buses may not accommodate all wheelchair sizes, and drivers often don't wait at the raised parts of stops.
- Uneven surfaces, steep cambers (e.g. Gardner Street), and potholes on pavements are dangerous for wheelchair users. It also requires expensive maintenance of chair outside of the usual cycle regularly
- Wheelchair users end up in the road owing to pavement congestion on some streets such and Ship Street.
- The incline at the Eye Hospital makes access difficult for the mobility impaired, though benefitting the visually impaired.
- Wheelchair users reported taxi drivers avoiding pickups due to their perception it is difficult to stop or turnaround on red routes.

Feedback related to learning difficulties:

- Dotted crossings unsafe for people with learning disabilities.

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

In response to the comments raised about consistent standards across projects the revised Our City Transport Plan includes a commitment to publish an updated Streetscape Design Guide. This will set out accessibility standards for schemes. It will be developed in close consultation with disabled people. Schemes in Our City Transport Plan will be delivered in accordance with this guidance. There are schemes within Our City Transport Plan that are focused on delivering improved public realm and pavements conditions.

Red routes schemes along London Road and Lewes Road have been successful in reducing pavement parking and improving traffic flow, particularly buses. As a results, further red route schemes are being proposed. It is our existing policy that licensed Hackney Carriages and private hire vehicles can stop to drop off disabled people. This policy clearly needs to be better communicated and this is an action taken from the consultation.

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

Does your analysis indicate a disproportionate impact relating to ethnicity?	~~YES /~~ NO

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

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

No disproportionate negative impacts identified for this group at this time.

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

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

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

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

No disproportionate negative impacts identified for this group at this time.

6.5 Gender Identity and Sex:

Does your analysis indicate a disproportionate impact relating to Gender Identity and Sex (including non-binary and intersex people)?	~~YES /~~ NO

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

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

No disproportionate negative impacts identified for this group at this time.

6.6 Gender Reassignment:

Does your analysis indicate a disproportionate impact relating to Gender Reassignment?	~~YES /~~ NO

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

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

No disproportionate negative impacts identified for this group at this time.

6.7 Sexual Orientation:

Does your analysis indicate a disproportionate impact relating to Sexual Orientation?	~~YES /~~ NO

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

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

No disproportionate negative impacts identified for this group at this time.

6.8 Marriage and Civil Partnership:

Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?	~~YES /~~ NO

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

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

No disproportionate negative impacts identified for this group at this time.

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

Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)?	~~YES /~~ NO

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

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

No disproportionate negative impacts identified for this group at this time.

6.10 Armed Forces Personnel, their families, and Veterans:

Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?	~~YES /~~ NO

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

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

No disproportionate negative impacts identified for this group at this time.

6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

Does your analysis indicate a disproportionate impact relating to Expatriates, Migrants, Asylum seekers, Refugees, those New to the UK, and UK visa or assigned legal status? (Especially considering for age, ethnicity, language, and various intersections)	~~YES /~~ NO

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

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

No disproportionate negative impacts identified for this group at this time.

6.12 Carers:

Does your analysis indicate a disproportionate impact relating to Carers (Especially considering for age, ethnicity, language, and various intersections).	**YES / ~~NO~~**

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

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

As disabled people often rely on carers to drive them to essential services, carers may face similar difficulties in accessing these services along red routes, as mentioned in section 6.2.

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

Does your analysis indicate a disproportionate impact relating to Looked after children, Care Leavers, Care and fostering experienced children and adults (Especially considering for age, ethnicity, language, and various intersections). **Also consider our Corporate Parenting Responsibility in connection to your activity.**	~~**YES**~~ **/ NO**

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

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

No disproportionate negative impacts identified for this group at this time.

6.14 Homelessness:

Does your analysis indicate a disproportionate impact relating to people experiencing homelessness, and associated risk and vulnerability? (Especially considering for age, veteran, ethnicity, language, and various intersections)	~~YES /~~ NO

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

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

No disproportionate negative impacts identified for this group at this time.

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

Does your analysis indicate a disproportionate impact relating to Domestic Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)?	~~YES /~~ NO

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

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

No disproportionate negative impacts identified for this group at this time.

6.16 Socio-economic Disadvantage:

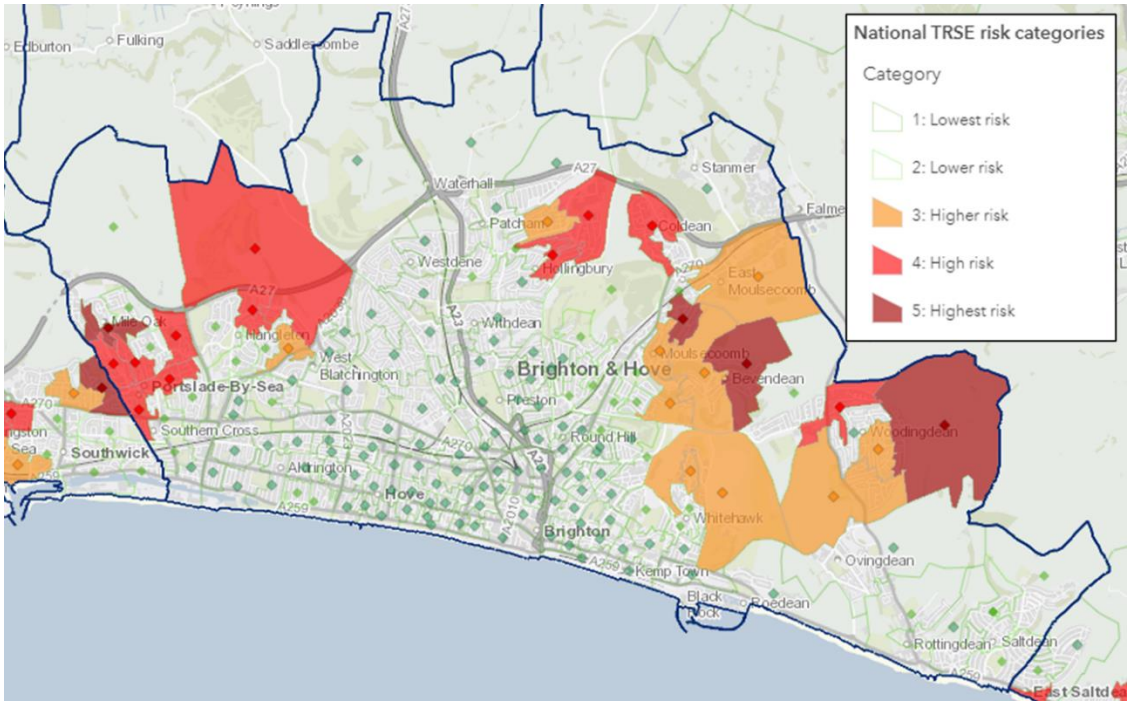
Does your analysis indicate a disproportionate impact relating to Socio-economic Disadvantage? (Especially considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections)	YES ~~/ NO~~

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

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

The evidence base includes an assessment of the Transport Risk of Social Exclusion. This identifies that lower income groups on the edge of the city (Woodingdean, Portslade, Bevendean, Coldean and Hollingbury) are at high risk of exclusion, because of the affordability of transport and their distance from key basic services – education, employments etc.

People living on the edges of the city requested better connectivity and more frequent bus services. The BSIP Accessibility Study has identified key areas for improvement and the BSIP Refresh includes proposals for 2025 and beyond to enhance the bus network and services, helping to reduce the risk of transport-related social exclusion in the city.



6.17 Human Rights:

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

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

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

No disproportionate negative impacts identified for this group at this time.

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

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

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

People who are members of multiple Minoritised groups may experience compounded impacts similar to those already identified for older people, young people, and disabled people. For example, those with mobility issues may face greater challenges accessing parking or public transport, while people with literacy or language barriers may find it more difficult to use online or app-based transport services. These overlapping factors can make it harder for them to travel independently or access essential services, even though the underlying barriers are shared with other groups.

An evaluation of the national Inclusive Transport Strategy spoke with participants who chose to travel by modes that were less accessible to them, because they could not afford those that were. It also highlighted that younger disabled people and those with less outwardly visible health conditions could internalise societal preconceptions about what disability looks like, and feel undeserving of extra help or adjustments.

7. Action planning

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

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

- Feedback to the consultation showed greatest support for the objective of 'maintaining roads and managing the network efficiently' the funding to deliver this objective has been increased. Within Our City Transport Plan 2035 there is indicative funding for the coming three financial years. Funding levels will be confirmed in the transport Capital Programme, which will be published

before March 2026. This will address concerns raised about the quality of pavements and streets that disabled people raised.

- To address concerns raised by disabled people about applying consistent standards on our schemes we have committed to publish an updated Streetscape design guide. We aim to have this done by the end of 2026. We will develop this in close consultation with disabled people. The document will then be used on all schemes undertaken by the council. It will cover:
  - How the council will ensure adequate footway widths.
  - Our approach to installing street trees, greening and sustainable urban drainage.
  - Auditing the existing provision of disabled bays and yellow line parking in high demand areas.
  - The design and provision of disabled parking in transport schemes.

- To address concerns about disabled access to services and shops on red routes we will ensure that the consultation report on the Western Road Red Route sets out in greater detail how the existing policy that allows Blue Badge holders to be picked up or dropped off, so long as the vehicle is not parked, is applied. The consultation report will be published by summer 2026.
- Issues that have been raised regarding bus services, such as access to schools and provision in more outlying areas, will be monitored through the Bus Service Improvement Plan. School route bus loading can be assessed and updates provided annually alongside the key performance indicators.

Which action plans will the identified actions be transferred to?

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

The above actions will be incorporated into the service plan for Transport Projects and Engineering once it is next updated. It is anticipated that this will be done in 2026 but no firm date is set for when it will be completed. In the interim the above actions will be incorporated into the Transport Policy & Strategy (part of Transport Projects & Engineering) service plan.

8. Outcome of your assessment

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

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

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

N/A

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

The recommendation in the draft cabinet report is for the revised Our City Transport Plan 2035 to be adopted. The revised Our City Transport Plan 2035, attached to the report, contains the commitment to develop a Streetscape design guide and an indicative three year spending plan.

9. Publication

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

N/A

10. Directorate and Service Approval

Signatory:	**Name and Job Title:**	**Date:** DD-MMM-YY
Responsible Lead Officer:	Kieran Taylor, Principal Transport Planner	12/11/2025
Accountable Manager:	Laura Wells, Transport Policy & Strategy Manager	25/11/25

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

EDI Review, Actions, and Approval:

Equality Impact Assessment sign-off

EIA Reference number assigned: DIRNAME##-DD-MMM-YY-EIA-Name
For example, HNC##-25-Dec-23-EIA-Home-Energy-Saving-Landlord-Scheme

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

Once the EDI Business Partner has considered the equalities impact to provide first level approval for by those submitting the EIA, they will get the EIA signed off and sent to the requester copying the Head of Service, Business Improvement Manager, Equalities inbox, any other service colleagues as appropriate to enable EIA tracking, accountability, and saving for publishing.

Signatory:	Name:	Date: DD-MMM-YY
EDI Business Partner:	Chris Brown	26-Nov-2025
EDI Manager:		
Head of Communities, Equality, and Third Sector (CETS) Service: *(For Budget EIAs/ in absence of EDI Manager/ as final approver)*		

Notes and recommendations from EDI Business Partner reviewing this assessment:

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

Notes and recommendations (if any) from Head of CETS Service reviewing this assessment:

LOCAL TRANSPORT PLAN 5 – STRATEGIC ENVIRONMENTAL ASSESSMENT

Brighton and Hove City Council

2025

Brighton & Hove

PROJECT CENTRE

Document Control

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Job Number	Issue	Description	Originator	Checked	Authorised
10779	0.9	SEA	DB	MV	

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1 Non-Technical Summary

1.1 Introduction

1.1.1 This Non-Technical Summary provides an overview of the Strategic Environmental Assessment (SEA) for the draft transport policy 'Our City Transport Plan 2035'. This is the title of the fifth Local Transport Plan (hereafter referred to in this document as 'LTP5') produced by Brighton and Hove City Council (BHCC). The following sections of this Non-Technical Summary are comprised of the following:

- Description of the content, purpose and scope of the draft LTP5;
- Description of what an SEA is, its purpose and the SEA process and how it has been applied to the draft LTP5, including the SEA objectives and guide questions used in the assessment;
- Consideration of alternatives to the delivery of the LTP5;
- A summary presentation of the findings of the SEA of the draft LTP5; and
- Sets out the next steps in the SEA process including monitoring.

1.1.2 Under European legislation the Strategic Environmental Assessment (SEA) Directive (2001/42/EC) requires that responsible authorities ensure that due regard for environmental and sustainability impacts are comprehensively integrated when drawing up any plans.

1.1.3 The SEA Directive introduces the following requirements for an SEA:

- The findings of the SEA are published in an environmental report, which sets out the significant effects of the draft plan, in this case Brighton and Hove's fifth Local Transport Plan.
- Consultation is undertaken on the plan and the environmental report.
- The results of consultation are considered in decision-making relating to the adoption of the plan.
- Information on how the results of the SEA have been considered is made available to the public.

1.1.4 This environmental report builds on the SEA Scoping Report produced by BHCC.

1.2 What is the Brighton and Hove Local Transport Plan?

1.2.1 A local transport plan is a strategic document prepared by local transport authorities in the UK to outline their vision, objectives and proposals for transport related projects, schemes and improvements within their area.

1.2.2 The BHCC LTP5 is the council's over-arching transport policy for the coming decade, which sets out both a long-term strategy and a short-term programme of work to deliver specific schemes. The plan sets out an ambitious vision for getting around a cleaner, fairer and growing city. To achieve this, the LTP5 sets out five key challenges that will be addressed, these are as follows:

- Enabling more people to live safer, healthier and more active lives
- Improving the flow of traffic on our roads
- Supporting the transition to low and zero emission vehicles
- Creating a transport network that is more inclusive
- Maintaining our roads and managing them as efficiently as possible

1.3 What is a Strategic Environmental Assessment?

1.3.1 A strategic environmental assessment is a process used to evaluate the potential environmental impacts of plans and/or policies before implementation. It is designed to ensure that environmental considerations are integrated into high-level decision making.

1.3.2 SEAs are required under the SEA Directive (2001/42/EC) in the UK, the process includes identifying, describing, and assessing the likely significant environmental effects of proposed actions, consulting with relevant authorities and the public, and incorporating findings into the final plan or programme.

1.3.3 The stages of an SEA are outlined below:

- Stage A – Setting the context and objectives, establishing the baseline and deciding on the scope
- Stage B – Developing and refining alternatives and assessing effects
- Stage C – Preparing the environmental report
- Stage D – Consulting on the draft plan and the environmental report
- Stage E – Monitoring the significant effects of implementing the plan or programme on the environment.

1.3.4 It is important to note that this environmental report will cover stages A, B and C of the above stages.

1.4 Coverage of the Environmental Report

1.4.1 The following items have been examined during the assessment and are set out in the environmental report:

- Scope of the SEA and SEA methodology
- Background information on Brighton and Hove's LTP5 and its main objectives
- The environmental baseline
- The SEA framework/SEA objectives
- The compatibility of LTP5 objectives with SEA objectives
- Development of alternative options for the LTP5
- Assessment of the environmental effect of the LTP5 and its alternatives
- Identification and analysis of environmental problems
- Monitoring measures

1.5 Environmental context and baseline

1.5.1 An LTP is influenced by other relevant plans, programmes and strategies at international, national, regional and local levels. At international level, international agreements and EU directives establish requirements and guidance on issues such as sustainable development, climate change, biodiversity, habitats, water and air quality. There are also specific national plans, guidance and strategies on aspects such as transport, planning, climate change, air quality, biodiversity, the historic environment and sustainable development. At a local level, the *Brighton and Hove City Plan 2023 – 2027* and the *Accessible City Strategy* are key policy documents which influence the direction of the LTP5.

1.5.2 Key environmental objectives of these various plans and programmes have been considered in the assessment of the Brighton and Hove LTP5.

1.6 SEA framework

1.6.1 A SEA framework of objectives has been devised from the review of plans and programmes, analysis of baseline data and consideration of environmental issues within the Borough. This framework, which includes a series of environmental objectives, is used to assess the environmental effects of the LTP5.

1.6.2 The SEA Directive does not specifically require the use of objectives or indicators in the SEA, but objectives can usefully demonstrate how environmental effects can be described, analysed and compared. The SEA objectives include:

- Protect and enhance the environment and important landscapes in the local area;
- Create a city where people thrive;
- Protect and enhance soil quality;
- Protect and enhance water quality;
- Reduce transport related air and noise pollution;
- Reduce transport related emissions;
- Protect and enhance heritage assets and their settings; and
- Contribute towards an inclusive, accessible and fair city.

1.7 Consideration of alternatives for the LTP5

1.7.1 A key element of the SEA process is the consideration of alternative ways of delivering the plan so that an assessment can be made of the best environmental options to take forward. The aim of the exercise is to assess the variety of options available for implementing the draft LTP5 objectives. It also assisted decision making on the preferred options to prioritise, taking account of the potential environmental effects of the whole LTP5.

1.7.2 The alternatives set out in this report are as follows:

- Option 1 – Do nothing
- Option 2 – Mix of modal investment
- Option 3 – Stable investment levels
- Option 4 – Increasing investment in public, shared and active travel
- Option 5 – Increased investment focused on one travel mode

1.8 Summary of findings of the SEA for the LTP5

1.8.1 The assessments undertaken in the SEA find that the likely effect of the LTP5 on the proposed SEA topics are both minor positive and significant positive, with the exception of the effects on land, soil and waste and water resources and quality, which are unknown. The effects on historic environment are likely to be both positive and negative.

1.8.2 Of the alternative options set out in the document, it was found that 'Option 4 – increasing investment in public, shared and active travel' scored the highest against the SEA objectives, with mostly positive and significant positive scores. 'Option 1 – do nothing' scored the lowest of all the options, with mostly significant negative and minor negative scores.

1.9 Mitigation and monitoring

1.9.1 Monitoring helps to keep track of the actual environmental effects of implementing the Brighton and Hove LTP5. The LTP5 includes a programme to monitor delivery of the initiatives, including key performance indicators (KPIs) and baselines against LTP5 objectives. SEA monitoring is also proposed within the environmental report. KPIs have been set out, with targets set for each SEA objective. These measures are subject to on-going consultation and will be defined in more detail in the run up to publication of the SEA statement following adoption of the final LTP5.

2 Introduction

2.1 Background

2.1.1 The geographical scope of this SEA is that of Brighton and Hove City Council's administrative area.

2.1.2 Brighton and Hove City Council (BHCC), like all local authorities in the UK, is required under the Transport Act 2008 to produce a local transport plan. The plans should include strategic objectives, a policy framework, an implementation plan and measures for monitoring and evaluation.

2.2 The SEA and the regulations

2.2.1 Under the Strategic Environmental Assessment (SEA) Directive 2001/42/EC, Brighton and Hove City Council is required to undertake an assessment of the city's fifth Local Transport Plan (LTP5) to determine the likely significant environmental effects of the proposed objectives and initiatives set out therein.

What is an SEA?

2.2.2 In the SEA Directive, an environmental assessment is defined as 'the preparation of an environmental report, the carrying out of consultations, the taking into account of the environmental report and the results of the consultations in decision-making and the provision of information on the decision.'

2.2.3 The objective of the SEA directive is:

'To provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development'.

2.2.4 Thus, a SEA ensures that environmental and sustainability implications of the LTP5 are adequately identified, addressed, mitigated, communicated to decision makers and monitored. The process also provides adequate opportunities to engage stakeholders, thus reducing the potential harm done to the environment.

2.2.5 Article B of the Directive 2001/42/EC requires the Environmental Report and the results of consultation to be considered during the decision-making process. To be effective, an SEA should be undertaken as an iterative process and should be fully integrated into the plan-making process.

2.3 Scope of the SEA

2.3.1 The SEA Directive provides an indicative list of issues/topics that should be considered when looking at the environmental impacts of the LTP5. These include:

- Biodiversity, fauna and flora;
- Population and human health;
- Air;
- Soil;
- Water;
- Climatic factors;
- Material assets;
- Cultural heritage; and
- Landscape.

2.3.2 The SEA Directive requires that efforts are focussed on significant environmental impacts of the LTP5. The Environmental Report is not intended to cover all impacts or environmental issues. The Environmental Report is not meant as a replacement for any Council reports that publish data, targets or monitoring information. In addition, the Environmental Report is not designed to carry out an Environmental Impact Assessment of individual proposals, policies or programmes. It is a strategic assessment of potential significant impacts of the LTP5.

2.3.3 The SEA is restricted to the geographical area of the LTP5, in this case, the Brighton and Hove City Council area. The SEA will also cover the same period as the LTP5, which is from 2025 until 2035.

2.4 Draft Local Transport Plan 5

2.4.1 The BHCC LTP5 is the council's over-arching transport policy for the coming decade, which sets out both a long-term strategy and a short-term programme of work to deliver specific schemes. The plan sets out an ambitious vision for getting around a cleaner, fairer and growing city. To achieve this, the LTP5 sets out five key challenges that will be addressed, these are as follows:

- Enabling more people to live safer, healthier and more active lives;
- Improving the flow of traffic on our roads;
- Supporting the transition to low and zero emission vehicles;
- Creating a transport network that is more inclusive; and
- Maintaining our roads and managing them as efficiently as possible

2.4.2 To address the above challenges, objectives have been set within the LTP5, each aiming to address one or more of the challenges. The LTP5 objectives can be found below.

- Increase public transport use;
- Enable the uptake and use of low and zero emission vehicles;

- Deliver a safe, inclusive and integrated transport system;
- Create well-maintained streets and pavements;
- Provide active travel choices for all and excellent public spaces; and
- Promote and use technology to reduce and manage travel

2.4.3 The capital programme of work for 2025/26 can be found in Table 2.1 overleaf.

Table 2.1 - BHCC capital programme of work for 2025/26

Primary Objective	Project / Scheme	Description	Funding allocations 2025/26 (£000s)
Increase public transport use	BSIP funded bus lanes, bus priority and accessibility, subsidies for fares and routes.	A259 Marine Parade & A23 Patcham bus lanes, Queens Road and Western Road Red Routes, provision of socially necessary bus routes and targeted fare subsidies, mobility hub feasibility, accessible bus stops and passenger information.	£9,280
Enable the uptake and use of low and zero emission vehicles	EV charge points	On street EV charge-points for residents, taxis and businesses	£903
Deliver a safe, inclusive and integrated transport system	Improving accessibility	Dropped kerbs accessibility programme and delivering the Public Right of Way improvement Plan	£200
	Improving accessible cycling	Bike hire facilities and cycle parking developments	£125
	Improving safety	Safer Better Streets, School Streets, School Travel Plan Measures and Collision Reduction	£415
Create well-maintained streets and pavements	Carriageway maintenance	Renewals and an ongoing Seek and Fix programme	£3,950
	Pavement maintenance	Renewals and an ongoing Seek and Fix programme	£628
	Drainage, structures and lighting maintenance	Covering gullies, pipes, retaining walls, historic lamp-columns, in-fill works on major roads and maintaining accurate asset data	£555
Provide active travel choices for all and excellent public spaces	Supporting active and inclusive travel	Delivering our LCWIP – including the A23 & A259 active travel schemes	£1,200
	Delivering major schemes	Valley Gardens Phase 3 (match funding)	£728
Deliver a safe, inclusive and integrated transport system **Create well-maintained streets and pavements** **Provide active travel choices for all and excellent public spaces**	Delivering major schemes	Project Management Support and delivery of Section 106 (developer contributions secured through planning) sustainable transport schemes.	£415
Promote and use technology to reduce and manage travel	Traffic signals	Refurbishment of signalised crossings/junctions	£150
		Grand Totals	£18,549

3 SEA Methodology

3.1 Introduction

3.1.1 This section outlines the methodology employed in producing the SEA. The section will include the stages of the SEA process, including the approach taken at each stage. The section will also include the relationship between the LTP5 and SEA, showing links between the work stages of each document.

3.2 SEA process

3.2.1 The SEA process is completed during the preparation of plans and strategies, in this case a local transport plan. The role is to promote sustainability through the assessment of the extent to which objectives and plans will contribute to achieve social and environmental objectives.

3.2.2 The SEA process can be split into five stages. This document will address stages A-C, which can be found in Table 3.1 overleaf.

Table 3.1 - Stages of the SEA process

Stage	Description	Approach
Stage A	Identify other relevant plans, programmes and environmental protection objectives	At inception liaise with BHCC to collect all necessary documents that relate to LTP5.
	Collecting baseline information	Undertake holistic document review of available data, including existing local, regional and national policy.
	Identifying environmental problems	Appraise the LTP5 objectives, delivery plans and targets against a range of themes to identify their impact from significant positive effect through to significant negative effect, including uncertainties, minor positive and negative effect and neutral effect.
	Develop SEA objectives	Working with BHCC develop SEA objectives based around the LTP5 objectives
	Consulting on the scope of SEA	Given the timescales there is no allowance for consultation within our scope
Stage B	Testing the plan or programme objectives against the SEA objectives	Prepare a matrix to identify synergies across the SEA and LTP5 objectives. From the objective setting in Stage A and BHCC's work to date on the LTP5.
	Developing strategic alternatives	These will be at a strategic level in keeping with the status of the SEA. We envisage this will include high level themes in line with SEA Regulations. • Do nothing • Mix of modal investment • Stable investment levels • Increasing investment in public, shared and active travel • Increased investment focused on one travel mode
	Predicting the effects of the plan or programme, including alternatives	The impacts will be assessed and presented in a table to clearly show the type and level of impact.
	Consider ways to mitigate adverse effects	For the significant negative impacts, a series of potential mitigation measures will be proposed and discussed with the BHCC team.
	Proposing measures to monitor the environmental effects of the plan or programme implementation	Develop a mechanism for monitoring the performance of the LTP5 over time. We will consider and cross reference existing programmes of work already undertaken by BHCC and regionally so as to minimise extra burden on the council
Stage C	Preparing the Environmental Report	Prepare a report that can be used for consultation in the next stages.

3.3 SEA and LTP5 relationship

3.3.1 The Environmental Assessment of Plans and Programmes Regulations 2004 states that the authority preparing a plan for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use shall carry out or secure the carrying out of and environmental assessment.[1]

3.3.2 The environmental report explains the likely significant environmental impacts of the LTP5 objectives, strategy, the alternatives considered, and the mitigation measures proposed. It demonstrates compliance with the SEA regulations and will accompany the draft LTP5.

3.3.3 Table 3.2 below indicates the main work component stages for the preparation of the Brighton and Hove City LTP5, and the link with the SEA stages.

Table 3.2 - LTP5 and SEA process stages and links

LTP5 Stage	SEA Stage
Determining the scope of LTP5; clarifying goals; specifying the problems or challenges	**A:** • Identify relevant plans, programmes and environmental objectives. • Collecting baseline information • Identifying environmental problems • Develop SEA objectives • Consulting on the scope of SEA
Generating options to resolve these challenges; appraising the options and predicting their effects. **Selecting preferred options for LTP5 and deciding priorities.**	**B:** • Testing the LTP5 objectives against the SEA objectives • Developing strategic alternatives • Predicting the effects of the LTP5, including alternatives • Consider ways to mitigate adverse effects • Proposing monitoring measures
Production of the draft LTP5	**C:** • Preparing the environmental report

[1] The Environmental Assessment of Plans and Programmes Regulations 2004

3.4 SEA Key and Guide

3.4.1 Table 3.3 below sets out the SEA key and guide for the assessment of significance. For each effect that is identified, a score will be given using the framework set out below. This will be done using expert judgement, and by reviewing the evidence available.

Table 3.3 -SEA key and guide for the assessment of significance

Symbol	Effect Significance	Description
++	Significant positive effect	The proposed measure/plan contributes significantly to the achievement of the proposed objectives
+	Minor positive effect	The proposed measure/plan contributes to the achievement of the proposed objectives
-	Minor negative effect	The proposed measure/plan detracts from the achievement of the proposed objectives
--	Significant negative effect	The proposed measure/plan detracts significantly from the achievement of the proposed objectives
+/-	Minor positive and negative effect	The proposed measure/plan has the potential for both a minor positive and negative effect
?	Uncertain effect	The proposed measure/plan has an uncertain relationship to the proposed objectives and/or insufficient information is available to enable an appraisal
0	Neutral effect	The proposed measure/plan does not have any effect on the achievement of the proposed objectives

4 Review of Relevant Policies

4.1 National, regional and local policies

4.1.1 Both the LTP5 and the SEA should be set in the context of national, regional and local policies, to ensure compliance with targets and objectives related to planning, transport, health and sustainability.

4.1.2 Figure 4.1 below sets out the policies and guidance document that were reviewed and considered as part of the SEA.

4.1.3 A more in-depth review of relevant policies can be found in Appendix A of the associated scoping report.

Figure 4.1 - Policy and guidance reviewed and considered for the SEA

5 Environmental Baseline

5.1 Introduction

5.1.1 Environmental baseline information has been gathered as part of an SEA Scoping Report. Within the report, legislation, policy, datasets and trends have been reviewed, baseline data has been compiled, HRA sites that may be affected have been identified, an SEA assessment framework was set out and stakeholders have been identified.

5.1.2 This section of the SEA report will provide a brief overview of the key information from the scoping report, namely, the SEA topics and the assessment framework.

5.2 SEA Topics

5.2.1 It should be noted that the SEA regulations consider only the environmental effects of a plan, this SEA will consider the wider impacts associated with the LTP5. Although the requirements of SEA regulations are specific, a joint appraisal will be undertaken which includes both sets of requirements/topics.

5.2.2 The baseline evidence that has been compiled as part of the scoping report has been split into eight sections, which aim to cover various sustainability issues. However, there are many issues which are similar and crossover, Table 5.1 below shows the relationship between the topic chapters and how the requirements of the SEA Regulations have been met.

Table 5.1 - The relationship between topic chapters and the SEA Regulations

Topic Chapter	SEA Regulations
Natural Environment and Landscape	Biodiversity, fauna, flora, landscape
Population, Health and Wellbeing	Population, human health
Land, Soil and Waste	Soil, Material assets
Water Resources and Quality	Water
Air Quality and Noise	Air
Climate Change, Flooding and Coastal Change	Climatic factors
Historic Environment	Cultural heritage
Social and Cultural Infrastructure	

5.3 SEA Objectives

For each SEA topic (see above), SEA objectives have been set out, as well as key questions that will be used to inform the assessments that will be undertaken within this SEA report. SEA objectives and key questions can be found in Table 5.2.

Table 5.2 - SEA objectives and key questions

SEA Topic	SEA Objectives	Key Questions – Will our City Transport Plan 2035…
Natural Environment and Landscape	Protect and enhance the environment and important landscapes in the local area	• Affect sites designated for nature conservation? • Affect habitats or species of flora and fauna? • Affect important landscapes? • Provide opportunities to enhance the landscape or natural environment?
Population, Health and Wellbeing	Create a city where people thrive	• Affect people's ability to access active transport? • Affect people's safety?
Land, Soil and Waste	Protect and enhance soil quality	• Affect pollution run-off from roads? • Cause any loss of land or soil (from construction) • Provide opportunities to improve the land or soil?
Water Resources and quality	Protect and enhance water quality	• Affect pollution run-off from roads?
Air Quality and Noise	Reduce transport related air and noise pollution	• Affect emissions of air pollutants that impact human health? • Affect noise generated by the road and rail network?
Climate Change, Flooding and Coastal Change	Reduce transport related emissions and	• Affect carbon emissions from use of the road network? • Impact flooding from surface or ground water?
Historic Environment	Protect and enhance heritage assets and their settings	• Affect designated heritage assets? • Affect the setting of conservation areas?
Social and Cultural Infrastructure	Contribute towards an inclusive, accessible and fair city.	• Improve access to services for those with protected characteristics and at risk of transport related social exclusion?

6 Environmental Effects Assessment

6.1 Identification and analysis of environmental problems

6.1.1 The SEA Directive requires that environmental problems are identified and analysed within the Environmental Report. In this section of the report, both environmental problems and opportunities have been identified, considering the baselines set out in the scoping report, and the LTP5. Table 6.1 overleaf shows this.

Table 6.1 - Identification and analysis of environmental problems and opportunities

SEA Topic	Likely Effect	Problem	Opportunities	Project/Scheme?
Natural Environment and Landscape	+	Loss of trees	• The LTP5 includes plans to review the streetscene guidance to standardise the approach to providing street trees. Work has already been undertaken since the last LTP5 to ensure more planting is done, for example, Western Road	• Valley Gardens Phase 3 – planting of additional trees and landscaping
	+	Transport related impacts on biodiversity	• The LTP5 prioritises the use of alternative modes of transport, including public transport, active travel modes, and low and zero carbon modes.	• BSIP funded bus lanes, bus priority and accessibility subsidies for fares and routes (see Table 2.1)
Population, Health and Wellbeing	++	Road safety: road traffic casualties	• The LTP5 states that a new Road Safety Action Plan that will set out targets on reducing casualties on roads. • The plan also states that the delivery of better infrastructure for active travel could improve the feeling of safety	• School streets, Safer Better Streets, School Travel Plan Measures (see Table 2.1)

	++	Accessibility: exclusion of people with mobility impairment or those living in deprived areas	• Funding will be dedicated to a rolling programme of accessibility improvements. This includes accessibility for pedestrians when crossing roads, for example. • The LTP5 includes plans for improvements to bus accessibility	• Dropped kerb accessibility programme (see Table 2.1)
	+	Community severance: high road traffic volume, HGV volume, transport related infrastructure	• The LTP5 states that improving congestion and journey times for all road users through mobility hubs is a major objective.	• Valley Gardens Phase 3 – simplifying the road layout for motorists, introduction of signalised junctions
	+	Security: crime and fear of crime	• The LTP5 aims to create attractive public spaces that are safe and easy to get around by active travel.	• Valley Gardens Phase 3 – improvements to lighting and active travel infrastructure
Land, Soil and Waste	?	Contamination through land-based transport	• It is unknown the effects that the LTP5 will have on Land, Soil and Waste. There is no evidence to suggest that there will be a positive or negative effect	

Water Resources and quality	?	Ground water contamination through land-based transport	• It is unknown the effects that the LTP5 will have on Water Resources and quality. There is no evidence to suggest that there will be a positive or negative effect	
Air Quality and Noise	++	Reduced air quality: increasing road traffic volume congestion, CO_2 and NO_2.	• The LTP5 states that measures will be implemented to improve the air quality in the area, for example, EVs, car clubs, and an emphasis on the transition to low and zero emission vehicles	• Valley Gardens Phase 3 – improvements to active travel infrastructure e.g. cycle lanes, pedestrian crossings
Climate Change, Flooding and Coastal Change	++	Extreme weather conditions: increasing risk of flooding, disruption to the transport network, deterioration of road network.	• The LTP5 promotes the transition to low and zero emission vehicles, as well as other alternatives to reduce the impact of the transport network on climate change. In addition, ongoing programmes include measures to improve drainage structures to reduce the risk of flooding	• A strong focus on Sustainable Urban Drainage System (SUDS) as well as the addition of greening and trees to reduce impermeable areas on streets
Historic Environment	+/-	Damage and/or contamination to heritage sites	• The LTP5 makes reference to projects/schemes that will maintain historic structures such as lamp columns, however, information on this topic is limited in the	• Reconstruction of the seafront Victorian arches – A259 • Madeira Terrace

		and their settings	LTP5	restoration
Social and Cultural Infrastructure	+	Air quality damage to cultural and social infrastructure. Creation of a socially excluding transport network	• The LTP5 puts emphasis on creating a transport network that is more inclusive, with an analysis of bus services being commissioned to understand how to improve areas at risk of social exclusion. • An emphasis is also put on the delivery of accessible and sustainable transport infrastructure throughout the BHCC area.	• BSIP funded bus lanes, bus priority and accessibility subsidies for fares and routes (see Table 2.1)

7 Assessment of the LTP5 Objectives

7.1 Assessment of the environmental effects

7.1.1 The SEA Directive and Regulations require that the Council assesses the environmental effects of Brighton and Hove's fifth Local Transport Plan. This section first assesses the relationship between the LTP5 objectives and the SEA objectives. It then continues to assess alternative options, namely, do nothing, mix of modal investment, stable investment levels, increasing investment in public, shared and active travel, and increased investment focused on one travel mode.

7.1.2 Table 7.1 assesses the relationship between BHCC's LTP5 objectives and the SEA objectives set out previously in this report. 'X' indicates a positive relationship between the SEA objective and the LTP5 objective. A blank space indicates there is no clear relationship.

7.2 Identifying alternatives

7.2.1 A necessary part of the SEA process is to look at alternative methods of achieving the objectives of the LTP5 for BHCC. Table 7.3 sets out the SEA objectives and the proposed alternatives. These are then scored using the matrix used previously, shown in Table 3.3.

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	SEA OBJECTIVES							
LTP5 OBJECTIVES	**Protect and enhance the environment and important landscapes in the local area**	**Create a city where people thrive**	**Protect and enhance soil quality**	**Protect and enhance water quality**	**Reduce transport related air and noise pollution**	**Reduce transport related emissions**	**Protect and enhance heritage assets and their settings**	**Contribute towards an inclusive, accessible and fair city.**
Increase public transport use		X			X	X		X
Enable the uptake and use of low and zero emission vehicles	X	X	X	X	X	X	X	X
Deliver a safe, inclusive and integrated transport system		X			X	X		X
Create well-maintained streets and pavements	X	X	X	X	X		X	X

Provide active travel choices for all and excellent public spaces		X			X	X		X
Promote and use technology to reduce and manage travel		X			X	X		X

Table 7.1 - Relationship between LTP5 objectives and SEA objectives

7.2.2 As shown in Table 7.1 above, several crossovers are present in the relationship between the LTP5 objectives and SEA objectives. All of the LTP5 objectives have a positive relationship with the following SEA objectives:

- Create a city where people thrive
- Contribute towards an inclusive, accessible and fair city

7.2.3 The SEA objectives with the least number of crossovers with the LTP5 objectives are as follows:

- Protect and enhance soil quality
- Protect and enhance water quality
- Protect and enhance the environment and important landscapes in the local area
- Protect and enhance heritage assets and their settings

7.2.4 This is due to many of the factors that may affect these objectives depend on the type of project or scheme as well as the geography of future projects or schemes.

7.3 Summary and Assessment of Alternative Options

Table 7.2 - Alternative options with descriptions and comments on the LTP5

Option	Description	Comment
Do nothing	No investment in sustainable travel modes	• Not aligned with the LTP5 vision for getting around a cleaner, fairer and growing city.
Mix of modal investment	A mix of measures in the LTP5, but the majority of spend would be on highway schemes. This would likely lead to the reduction in the investment spent on sustainable transport	• Risk of not demonstrating a package of multi modal measures that may be needed to secure funding or investment. • Does not support the vision of the LTP5, likely to result in the reduction of investment in sustainable transport projects.
Stable investment levels	A mix of highway, cycle and public transport projects and schemes	• Contributes to the vision and objectives of the LTP5. • External influences may impact the investment levels for local transport projects/schemes.
Increasing investment in public, shared and active travel	Increased focus on active travel and public transport	• Contributes to the LTP5 vision and objectives. • Contributes towards reducing carbon through promoting sustainable travel. • Aligns well with plans already set out in the LTP5 such as the move towards low and zero emissions modes.
Increased investment focused on one travel mode	LTP5 investment focused on a single mode choice. For example, investment mainly focused on active travel.	• This option would support multiple objectives set out in the LTP5 but is not likely to support on all. For example, increased investment on active travel will have a positive effect on the uptake of zero and low emission vehicles, however, may have a negative effect on the increase of public transport use. • Mode choice ultimately depends on location and journey, so this approach is unlikely to be suitable for the LTP5.

Table 7.3 - Assessment of alternative options against the SEA objectives

SEA Objective	Option 1 – Do nothing	Option 2 – Mix of modal investment	Option 3 – Stable investment levels	Option 4 – Increasing investment in public, shared and active travel	Option 5 – Increased investment focused on one travel mode
Protect and enhance the environment and important landscapes in the local area	-	+/-	+	+	+/-
Create a city where people thrive	--	+	+	++	+/-
Protect and enhance soil quality	?	?	?	?	?
Protect and enhance water quality	?	?	?	?	?
Reduce transport related air and noise pollution	--	-	+/-	++	+/-
Reduce transport related emissions	--	-	+/-	++	+/-
Protect and enhance heritage assets and their settings	-	+/-	0	0	0

Contribute towards an inclusive, accessible and fair city.	--	+	+	++	+/-

8 Monitoring

8.1 The purpose of monitoring

8.1.1 Under the SEA Directive, there is a statutory requirement to monitor the environmental impacts of the implementation of the LTP5. The LTP5 must therefore be monitored and reported to comply with the Directive as well as to continue to identify problems and issues that need resolving.

8.1.2 Monitoring is the systematic measurement of a parameter in terms of magnitude, time and space. Monitoring is not limited to quantitative or technological measurements and may include qualitative issues such as human health or landscape quality.

8.1.3 Questions that can be answered through the monitoring of the plan are:

- Is the plan contributing to the desired environmental objectives and targets?
- Is the plan performing as well as expected?
- Are mitigating measures performing as well as expected?
- Are there and undesirable environmental effects? Are these within acceptable limits, or is remedial action required?

8.1.4 This process is beneficial to the LTP5 as it allows any significant environmental effects of the plan's implementation to be identified and dealt with early in the planning process. It also allows the actual effects of the LTP5 to be assessed against those predicted in the SEA and can provide baseline information for future plans.

8.2 Monitoring for the SEA

8.2.1 To monitor the SEA, targets key performance indicators will be set out for each of the SEA objectives, with targets also being set for each objective. This will provide a baseline for the implementation of the LTP5 to be monitored and assessed throughout the planning process. Table 8.1 overleaf shows this.

Table 8.1 - Key performance indicators and monitoring targets for the SEA

SEA Objective	Key Performance Indicators	Target
Protect and enhance the environment and important landscapes in the local area	• Number of transport infrastructure projects/schemes granted contrary to advice from Natural England	• None
Create a city where people thrive	• Bus passenger statistics, number of elderly and disabled people on local bus services • Walking and cycling statistics, number of people walking and cycling to commute, for example	• Aim to maintain or increase
Protect and enhance soil quality	• None	• None
Protect and enhance water quality	• None	• None
Reduce transport related air and noise pollution	• Number of transport infrastructure projects/schemes granted contrary to advice from the Environmental Agency. • Air quality and noise monitoring, particularly in current areas of concern	• Aim to reduce or maintain
Reduce transport related emissions	• Air quality monitoring	• Aim to reduce or maintain
Protect and enhance heritage assets and their settings	• Number of transport infrastructure projects/schemes granted contrary to advice from Historic England	• None
Contribute towards an inclusive, accessible and fair city.	• Bus passenger statistics, number of elderly and disabled people on local public transport services • Walking and cycling statistics, number of people walking and cycling to commute, for example. Including people of all ages and people with disabilities.	• Aim to maintain or increase

9 Next Steps

9.1 Consultation on draft LTP5 and SEA

9.1.1 The SEA Regulations set specific requirements for consultation with the statutory consultees, the public and other interested parties and require that the environmental report is made available for consultation alongside the draft LTP5.

9.1.2 This environmental report will be made available for wider public consultation during the public consultation held in summer 2025. Both the environmental report and the draft LTP5 will be available on the Council's consultation platform, Your Voice.

9.2 SEA statement

9.2.1 When the LTP5 is adopted, it will be accompanied by an SEA post adoption statement. The SEA statement will provide the following information:

- How environmental considerations have been integrated into the plan;
- How the environmental report has been considered in the LTP5's development;
- How opinions expressed in relation to the consultations on the LTP5 and the environmental report have been considered;
- The reasons for choosing the LTP5 as adopted, in the light of the other reasonable alternatives dealt with; and
- The measures to be taken to monitor any possible significant environmental effects of the implementation of the LTP5.

Quality

It is the policy of Project Centre to supply Services that meet or exceed our clients' expectations of Quality and Service. To this end, the Company's Quality Management System (QMS) has been structured to encompass all aspects of the Company's activities including such areas as Sales, Design and Client Service.

By adopting our QMS on all aspects of the Company, Project Centre aims to achieve the following objectives:

- Ensure a clear understanding of customer requirements;
- Ensure projects are completed to programme and within budget;
- Improve productivity by having consistent procedures;
- Increase flexibility of staff and systems through the adoption of a common approach to staff appraisal and training;
- Continually improve the standard of service we provide internally and externally;
- Achieve continuous and appropriate improvement in all aspects of the company;

Our Quality Management Manual is supported by detailed operational documentation. These relate to codes of practice, technical specifications, work instructions, Key Performance Indicators, and other relevant documentation to form a working set of documents governing the required work practices throughout the Company.

All employees are trained to understand and discharge their individual responsibilities to ensure the effective operation of the Quality Management System.

Brighton & Hove

PROJECT CENTRE

Award Winning

CIHT AWARDS 2021 WINNER Employer of the Year

THE INVESTORS IN PEOPLE AWARDS 2021

ice Awards 2020 Winner

LANDSCAPE INSTITUTE AWARDS 2020 WINNER

british parking awards 2019 WINNER

british parking awards 2020 WINNER

british parking awards 2021 WINNER

Certifications

bsi ISO/IEC 27001 Information Security Management CERTIFIED

bsi ISO 14001 Environmental Management CERTIFIED

bsi ISO 9001 Quality Management Systems CERTIFIED

bsi ISO 45001 Occupational Health and Safety Management CERTIFIED

Accreditations

CIHT Diversity & Inclusion Charter

POSITIVE ABOUT DISABLED PEOPLE

INVESTORS IN PEOPLE™ We invest in people Platinum

constructionline

URBAN DESIGN GROUP REGISTERED PRACTICE

New Civil Engineer 100 COMPANIES OF THE YEAR 2018 RANKED COMPANY

Memberships

PLEDGE TO NET ZERO

CIHT Corporate Partner

ice Institution of Civil Engineers

nec GOLD Users' Group Member

RoSPA Member

Landscape Institute Registered practice

BPA MEMBER OF THE BRITISH PARKING ASSOCIATION

MEMBER OF CIRAS

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Risk no.	Risk title	Causes	Level of risk exposure (0-5)		Current risk score	Mitigating actions	Adjusted level of risk exposure (0-5)		Target risk score
			Likelihood	Impact			Likelihood	Impact	
1	Policy or political change before approval	A change in local or national priorities (e.g. leadership change, devolution, government guidance updates) could affect the acceptance of the transport plan. However, as the plan is intended for Cabinet consideration in December, significant change is unlikely.	1	4	4	Remain flexible and adaptive to policy or leadership changes.	1	3	3
2	Uncertainty about long-term funding	Funding is allocated annually and no long-term guarantee. Hence, the 3-year programme represents a reasonable forecast based on the current capital programme.	3	4	12	Continue to lobby central government and seek grant opportunities and strengthen business cases for funding bids.	2	3	6
4	Technical or data uncertainty	Limited availability of local data or reliance on outdated datasets.	3	3	9	Use national datasets to fill the evidence gap and apply robust assumptions to produce credible results.	1	2	2
5	Loss of internal, political and public support	Disagreement with proposals in the transport plan	2	3	6	Undertake public consultation and engagement with internal teams and political leads and maintain ongoing engagement to address concerns.	1	2	2

6	Failure to balance diverse user needs	Limited spaces, funding or conflicting priorities between modes	3	3	9	Engaging proactively with communities especially underrepresented groups to ensure inclusive design	1	3	3

Brighton & Hove City Council

Council Agenda Item 83

Subject: **Decisions on Executive Functions taken under Special Urgency Procedures**

Date of meeting: **29 January 2026**

Report of: **Chief Executive**

Contact Officer: **Name: Anthony Soyinka**
Tel: 01273 291 006
Email: Anthony.soyinka@brighton-hove.gov.uk

Ward(s) affected: **All**

For general release

1. Purpose of the report and policy context

1.1 This report notifies the Council of decisions taken under special urgency procedure rules in accordance with the provisions of Part 3E, Section 17 of the Councils Constitution.

2. Recommendations

2.1 None – For Information Only

3. Context and background information

3.1 In accordance with the Access to Information Procedure Rules (Rule 18), Part 3E of the Council's constitution and paragraph 19 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012, the use of the Special Urgency procedure in relation to Executive decisions is to be reported quarterly to Council for information.

4. Decisions taken under special urgency procedures

4.1 Since the last report to Council, four decisions have been taken using the Special Urgency procedure. The reports and subsequent decisions were published on the Council's website in accordance with the Council's Executive Procedure Rules. The decision to use the special urgency rules in accordance with Part 3E, Section 17 of the Councils Access to Information rules was made by the Chair of the relevant Overview and Scrutiny Panel(s). Decisions taken under this provision are exempted from Call-In.

The decision(s) taken are set out below for information.

4.1.1 **Title: Use of Housing Revenue Account voids as Temporary Accommodation: 14 January 2026**

Brighton & Hove City Council - Decision - Use of Housing Revenue Account voids as Temporary Accommodation

Decision:

1) The Leader agreed to the interim use of all Housing Revenue Account voids as Temporary Accommodation between 19 January 2026 and 1 May 2026.

2) The Leader agreed to adopt the draft policy on the use of Housing Revenue Account Void Properties as Temporary Accommodation as set out in Appendix 1.

3) The Leader delegated authority to Corporate Director for Homes & Adult Social Care to take all necessary steps to implement the policy as set out in Appendix 1.

4) The Leader delegated authority to Corporate Director for Homes & Adult Social Care to begin consultation on the policy as set out in Appendix 1, which will inform a review of the policy at the conclusion of the interim position and will inform any further report to Cabinet seeking possible extension or changes to the interim period or policy, for a limited duration.

Reasons for Urgency:

The reasons for urgency as set out in the report were:

Due to the special circumstances outlined below, and in accordance with Regulation 10 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012, compliance with the requirement to provide 28 days' notice has not been possible. The urgency of the matter has been agreed upon by the Chair of the relevant Overview and Scrutiny, and it is deemed necessary to consider this item without delay, due to the urgent need to address significant financial pressures on the council and to address the challenges households are facing under the current arrangements.

4.1.2 **Title: Direct Award of Contracts to Temporary Accommodation Provider: 31 December 2025**

Brighton & Hove City Council - Decision - Direct Award of Contracts to Temporary Accommodation Provider (brighton-hove.gov.uk)

Decision:

1) That the Leader of the Council agrees to award a contract to Base One for the provision of Temporary Accommodation on the terms as set out in this report.

2) That the Leader of the Council delegates authority to Corporate Director – Homes & Adult Social Care to finalise contract terms and enter into the contract with Base One together with all ancillary legal documentation.

Reasons for Urgency:

The reasons for urgency as set out in the report were:

Due to the special circumstances outlined below, and in accordance with Regulation 10 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012, compliance with the requirement to provide 28 days' notice has not been possible. The urgency of the matter has been agreed upon by the Chair of the relevant Overview and Scrutiny, and it is deemed necessary to consider this item without delay, due to the urgency to award a contract to help ensure the financial sustainability of the council.

4.1.3 **Title: Community Equipment Service Contract: 4 August 2025**

Brighton & Hove City Council - Decision – Community Equipment Service Contract (brighton-hove.gov.uk)

Decision:

1) That the Leader of the Council grants delegated authority to the Corporate Director of Homes and Adult Social Care to take all necessary steps to directly award a call off- contract to Millbrook from an existing framework (being the Integrated Community Care Equipment and Associated Services Y24008, under Lot 1 – Integrated Community Care Equipment and Associated Services) for a three (3) year period at an estimated value of up to £11m.

Reasons for Urgency:

The reasons for urgency as set out in the report were:

To ensure continuity of this critical service, an urgent contract award is required.

4.1.4 **Title: Brighton i360 - Decision on Future**

Brighton & Hove City Council - Decision - Brighton i360 - Decision on Future

Decision:

1) Cabinet agrees to release the security on its £51m loan debt and rolled-up interest to the Buyer. In return, the city council will receive a future share of revenue, as set out in the Part 2 report.

2) Cabinet delegates authority to the Corporate Director for Operations, following consultation with the Cabinet Member for Finance and City Regeneration, to complete negotiations and any legal documentation required to give effect to recommendation 2.1 above.

3) Cabinet agrees to commission an external independent investigation to understand the circumstances of and lessons from the council's original decision to loan public money to deliver the Brighton i360.

Reasons for Urgency:

The reasons for urgency as set out in the report were:

The closing date for bids was 13th January 2024 and discussions with Interpath and the Buyer continued beyond the report publication date. Interpath need to complete the sale before January 31st and the sale cannot happen without the release of the council's security on the loan

5. Analysis and consideration of alternative options

5.1 This report is for information only. The decisions have been made and implemented. The decisions made pursuant to the urgency delegation are required to be reported to Council.

6. Community engagement and consultation

6.1 None for the purpose of this report.

7. Financial implications

7.1 There are no resource implications of this report, which is for information. The resource implications of each particular decision are set out in the respective decision reports.

Finance Officer: Ishemupenyu Chagonda
Date: 21/01/2026

8. Legal implications

8.1 There are no legal implications of this report. The legal implications in respect of each decision are set out in the decision reports. The Council's Constitution requires Cabinet decisions taken under Special Urgency provisions to be reported back to Council for information.

Lawyer: Elizabeth Culbert
Date: 21/01/2026

9. Equalities implications

9.1 None for the purpose of this report.

10. Sustainability implications

10.1 None for the purpose of this report.

11. Conclusion

11.1 This document reports to Council the urgent decisions taken by Cabinet and the Leader. The report is presented to Council for information.

Supporting Documentation

12. Background Papers

Brighton & Hove City Council - Decision - Use of Housing Revenue Account voids as Temporary Accommodation

Brighton & Hove City Council - Decision - Direct Award of Contracts to Temporary Accommodation Provider (brighton-hove.gov.uk)

Brighton & Hove City Council - Decision – Community Equipment Service Contract (brighton-hove.gov.uk)

Brighton & Hove City Council - Decision - Brighton i360 - Decision on Future

Brighton & Hove City Council

Council — Agenda Item 84

Subject: **Tourist Tax**

Date of meeting: **29 January 2026**

Proposer: **Cllr Ivan Lyons**
Seconder: **Cllr Emma Hogan**

Ward(s) affected: **All**

Notice of Motion

Conservative Group

This Council acknowledges that:

1. The Government announced in the Budget that Mayors of Strategic Authorities will be permitted to levy a tax on overnight visitors;

2. Hospitality businesses already face financial pressure following increases to National Insurance and business rates;

3. There are concerns this administration may lobby the government for the powers to implement a Tourism Tax in Brighton & Hove, helping continue to suppress visitor numbers to the city;

4. That the introduction of a Tourist Tax will impose another financial burden on local hotels, B&Bs, and tourism-based businesses;

5. That a Tourism Tax would deter buyers for the Pavilion Pier coming forward;

6. That a Tourist Tax would be passed directly onto visitors, increasing holiday costs during a period of high living expenses, undermining efforts to reduce the cost of living;

7. That local economies, particularly those dependent on seasonal visitors rely heavily on a thriving hospitality industry, and this additional tax risks making local areas less competitive compared to other UK and international destinations.

This council therefore resolves to call for:

1. The Leader to write to the Secretary of State for Housing, Communities and Local Government expressing this Council's concerns regarding the potential impact of this tax on local businesses and requesting the Government reconsider this proposal and engage with hospitality businesses and industry experts to assess the economic harm and potential alternatives.

Supporting Information:

Brighton leader: 'Tourism tax should come to councils' | Local Government Chronicle (LGC)
Visitor levy in England - GOV.UK

Brighton & Hove City Council

Council Agenda Item 85

Subject: **Endorsement of the Rights of Nature Bill**

Date of meeting: **29 January 2026**

Proposer: **Cllr Kerry Pickett**
Seconder: **Cllr Mark Earthey**

Ward(s) affected: All

Joint Notice of Motion

Green & Brighton and Hove Independent Groups

This Council notes:

1) Current environmental laws and regulations are failing to prevent the destruction of nature, often simply regulating the rate of destruction.
2) 'Rights of Nature' is a growing international legal, political and social movement that aims to rethink our relationship with nature - from one of dominance to one of interdependency requiring a respectful, holistic and empathic approach. It can act as a catalyst to shift our thinking from an extractive economy towards a regenerative economy.
3) The UK Nature's Rights Bill introduces a transformative legal framework — the Integrated Rights Framework — that recognises nature as a rights bearing legal subject and embeds human and economic rights within ecological limits.

This council resolves to request the:

1) Council acknowledges the growing global movement of 'Rights of Nature' as a framework for rethinking its relationship with our city's ecosystems.
2) Council agrees that Brighton & Hove City Council signs the pledge[1] to endorse the principles of the Nature's Rights Bill changing the legal status of nature from being objects, property and resources to a legal subject with inherent rights.
3) Leader of the Council to write to the Government calling for the House of Commons to table the Nature's Rights Bill and embed the Integrated Rights Framework into UK law.
4) Council considers a 'bottom up' approach working with local communities, environmental groups and relevant stakeholders in order to implement the Nature's Rights initiatives.

Supporting Information:
[1]https://docs.google.com/forms/d/e/1FAIpQLScCWr0kEEcG2p4XF1mqsv_XsHjBYK0Ae7cxadLorrDrlTet9Q/viewform

Brighton & Hove City Council

Council Agenda Item 86

Subject: **Right to Play**

Date of meeting: **29 January 2026**

Proposer: **Cllr Hill**
Seconder: **Cllr Shanks**

Ward(s) affected: All

Notice of Motion

Green Group

This Council notes:

1) The right to play should be available to all people in Brighton & Hove, especially children and young people.

2) Quality play opportunities are essential to physical and cognitive development.

3) Outdoor play in England has halved in a generation according to Raising the Nation's Play Commission due playground closures, busier roads, shortened school break times and the use of smartphones.

4) Play England has proposed that City Planning should place play alongside housing, infrastructure and sustainability as a core element of spatial planning in the National Planning Policy Framework (NPPF)

Therefore, resolves to:

1) Ask the Council Leader to write to Baroness Taylor of Stevenage echoing Play England's request for a House of Lords amendment to the NPPF to create a statutory requirement for play sufficiency on local authorities.

2) Ask the People Overview and Scrutiny Committee to consider setting up a 'Play Sufficiency' Task and Finish Group. This may consider areas such as:
   - An audit of existing play provision
   - Removing 'no ball games' signs, and similar, from public land and encourage private landowners to do so.
   - A map of smaller green spaces that could be used for play.
   - Looking at ways to ensure new developments are considerate to the needs of children and young people as part of the City Plan.
   - Seeking to invest capital funding into play parks and facilities that are accessible to all.
   - Investigating ways to improve access to nature-based play.
   - Designating a Councillor to act as the city's 'play champion'

Supporting Information:

https://www.bbc.co.uk/news/articles/czednjy7wlxo

https://www.playscotland.org/resources/print/Getting-It-Right-For-Play-2025.pdf?plsctml_id=25096

https://play.wales/wp-content/uploads/2023/03/Making-play-sufficiency-possible-summary-report-2020.pdf

Examples of play sufficiency assessments which are required in Wales & Scotland:
https://www.eastdunbarton.gov.uk/media/jewbfkgx/1-edc-play-sufficiency-assessment_full.pdf

https://www.rctcbc.gov.uk/EN/Resident/ChildrensServices/HelpandSupportforFamilies/Informationforfamilies/Childcare/YouthClubsandActivities/ThePlaySufficiencyAssessmentPSA.aspx

Brighton & Hove City Council

Council Agenda Item 87

Subject: **Co-Operative Housing**

Date of meeting: **29 January 2026**

Proposer: **Cllr Paul Nann**
Seconder: **Cllr Joy Robinson**

Ward(s) affected: All

Notice of Motion

Labour Group

This Council notes:

1) That locally, nationally and internationally, co-operative housing schemes provide sustainable, genuinely affordable housing solutions that can help towards easing the homeless crisis as well as creating vibrant and cohesive communities.
2) That Brighton & Hove is home to a number of successful housing co-operative schemes, including Two Piers, Bunker Housing, Rosa Bridge and Seasalt.
3) That such schemes have historically been seen as a small scale, somewhat 'niche' form of housing in the UK, whereas in Zurich for example, 20% of all residents live in a co-op, and co-operative developments also include shops, nurseries, hotels, restaurants and workspaces.
4) That the current Government is working with the **Confederation of Co-operative Housing** and other sector stakeholders to legislate for a co-operative form of tenure putting such tenants on the same footing as other social housing tenants; amending the Localism Act to provide more support; and provide access to low-cost capital finance for co-operative organisations currently priced out of the market.

This Council Resolves:

Request that Place Overview & Scrutiny Committee considers setting up a Task & Finish Group to make recommendations on how BHCC can:

1) Actively raise the profile of and seek to grow the co-operative housing sector through promoting the benefits to residents and through City Plan.
2) Engage with other councils regarding best practise and government regarding the legislative picture.
3) Develop a practical strategy to remove barriers and facilitate new affordable, community-led co-ops in the city.