

Place Overview & Scrutiny

Date: **8 September 2026**

Time: **4.00pm**

Venue:

Members: **Councillors:** Evans (Chair), Cattell (Deputy Chair), Fishleigh, Goddard, Lademacher, Meadows, Sykes, Wilkinson and Winder Co-optees: Bernadette Kent (Older Peoples' Council), George Woodhams (Youth Council)

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Chief Executive
Hove Town Hall
Norton Road
Hove BN3 3BQ

Date of Publication - Monday, 31 August 2026

AGENDA

Part One

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16 PROCEDURAL BUSINESS

- (a) **Declaration of Substitutes:** Where Councillors are unable to attend a meeting, a substitute Member from the same Political Group may attend, speak and vote in their place for that meeting.
- (b) **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.

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- (c) **Exclusion of Press and Public:** To consider whether, in view of the nature of the business to be transacted, or the nature of the proceedings, the press and public should be excluded from the meeting when any of the following items are under consideration.

NOTE: *Any item appearing in Part Two of the Agenda states in its heading the category under which the information disclosed in the report is exempt from disclosure and therefore not available to the public.*

A list and description of the exempt categories is available for public inspection at Brighton and Hove Town Halls and on-line in the Constitution at part 7.1.

17 MINUTES

7 - 26

To approve the draft minutes of the 22nd July 2026 Place Overview & Scrutiny Committee meeting

To approve the draft minutes of the call-in Place Overview & Scrutiny Committee meeting on 28th July 2026

18 CHAIR'S COMMUNICATION

19 PUBLIC INVOLVEMENT

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

- (a) **Petitions:** To receive any petitions presented by members of the public to the full Council or to the meeting itself;
- (b) **Written Questions:** To receive any questions submitted by the due date of 10am on 2nd September 2026
- (c) **Deputations:** To receive any deputations submitted by the due date of 10am on 26th August 2026

20 MEMBER INVOLVEMENT

To consider the following matters raised by Members:

- (a) **Petitions:** To receive any petitions submitted to the full Council or to the meeting itself.
- (b) **Written Questions:** A list of written questions submitted by Members has been included in the agenda papers.
- (c) **Letters:** To consider any letters submitted by Members.
- (d) **Notices of Motion:** To consider any Notices of Motion.

21 CITY PLAN: BALANCING HOMES AND EMPLOYMENT LAND 27 - 38

Contact Officer: *Natalie Sacks-Hammond*
Ward Affected: *All Wards*

22 RECYCLING AND BEHAVIOUR CHANGE 39 - 62

Contact Officer: *Natalie Sacks-Hammond*
Ward Affected: *All Wards*

23 MEMORIALS POLICY 63 - 80

Contact Officer: *Natalie Sacks-Hammond*
Ward Affected: *All Wards*

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Further information

For further details and general enquiries about this meeting contact Anthony Soyinka, (email Natalie.Sacks-Hammond@brighton-hove.gov.uk) or email democratic.services@brighton-hove.gov.uk

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BRIGHTON & HOVE CITY COUNCIL

PLACE OVERVIEW & SCRUTINY

4.00pm 22 JULY 2026

MINUTES

Present: Councillor Evans (Chair) Cattell (Deputy Chair), Fishleigh, Goddard, Lademacher, Meadows, Miller, Sykes, Wilkinson and Winder

Other Members present: Councillors

PART ONE

1 PROCEDURAL BUSINESS

1. Procedural Business

1a Declarations of substitutions: Apologies received from Bernadette Kent and George Woodhams.

1b Declarations of interest: Cllr Miller declared that she was Cabinet Member for Culture, Heritage and Tourism and was a witness to the Task & Finish Group on Heritage.

Mark Strong made a point of order regarding a space for black and racialised minoritised people on the committee. Giles Rossington, Scrutiny Manager, said that yes in theory there is a place on the committee but he was unsure of the process for electing them.

1c Exclusion of the press and public

There were no Part Two items so the press and public were not excluded.

2 MINUTES

2.1 **RESOLVED–** that the minutes of the Place Overview & Scrutiny Meeting on 24th March 2026 were approved.

3 CHAIR'S COMMUNICATION

3.1 The Chair gave the following communication:

Today we have five agenda items to look at, which we will take in a slightly different order to the published agenda. We will start with the Housing Safety and Quality Compliance progress report that has been regularly presented to this committee following the Social Housing Regulator judgement in 2024.

Following that, we have a presentation giving an update on Devolution with details and plans regarding the new Sussex and Brighton Strategic Authority, which was established earlier this year.

Then we will have an update on City Plan which is one of the most important documents for the city, where we will be informed on the emerging plans for consultation and the proposed timeline.

We will then be looking at the final report from the Task & Finish Group which started back in November 2025 looking at heritage in the city. The group have produced 15 recommendations and will be asking members to agree to refer the recommendations to Cabinet for consideration.

We will finish with the scoping report for our next Task & Finish Group which is on the Visitor Economy as voted for back in March. Members are being asked to approve the establishment of this new Task & Finish Group.

In the interests of time, can I please request that both those asking and answering questions are as brief and to the point as possible, as we want everyone who wishes to contribute to have the opportunity to do so. We also don't want the meeting to overrun too much into the evening. I'm going to ask those presenting to keep their introductions as brief as possible to allow as much time as we can for questions. Thank you.

4 PUBLIC INVOLVEMENT

4.1 There were no public engagement items.

5 MEMBER INVOLVEMENT

5.1 There were no member questions.

6 HOUSING SAFETY AND QUALITY COMPLIANCE - PROGRESS UPDATE

6.1 Cllr Williams, Cabinet Member for Housing, presented to the committee. She was joined by Genette Laws, Corporate Director for Homes and Adult Social Care, Mikila Beck, Head of Housing Repairs and Maintenance, and Stephan Scheiner, Head of Housing Safety and Regulatory Compliance.

6.2 Micheal Creedy said that he lived in sheltered housing and thought the process had been productive.

6.3 Cllr Cattell said that there were too many acronyms in the report which made it hard to read. She asked for a glossary in future, such as that provided in the SEND report to People Overview & Scrutiny Committee.

6.4 Cllr Wilkinson welcomed the positive news and asked about resident experience and how it was measured. Cllr Williams said that surveys were always important but that not everyone filled them in, and those that did were often motivated to do so because they were unhappy. She said that estate teams were out door knocking and asking residents what they needed. Genette Laws added that the repairs team and housing generally were very technically brilliant but were now becoming more person centred, which was a good culture change. She said that they had the annual Tenant Satisfaction Survey which had seen a 9 percentage point increase in dealing with repairs. She said that this goes to Cabinet every year and would go to People Overview & Scrutiny Committee for pre-decision scrutiny.

6.5 Cllr Lademacher welcomed the progress and asked how the council was ensuring that temporary housing contractors in the private sector were adhering to fire safety regulations, providing an example of prosecution that was in the news. Cllr Williams said that they worked closely with the fire services on prosecutions. Genette Laws said that it was important to distinguish between council commissioned temporary accommodation and private sector housing which may be used as temporary accommodation that has not been commissioned. She said that they have a responsibility as a council alongside the fire and rescue service on prosecution. She added that she was happy to speak outside of the meeting regarding the specific case mentioned.

6.6 Cllr Lademacher asked about response times related to Awaab's Law as it was not clear in the data. Mikila Beck said that it was really important that the data was clear and that they were working to improve it. She added that it was important to distinguish between where it is the council not meeting target times and where residents have not provided access to their property within the timeframe.

6.7 Cllr Goddard said that it had been a very low point for the housing service and that this update is fabulous progress. He said that all housing staff deserved congratulations. He asked for further details on the damp and mould work and proactive outreach. Cllr Williams said that damp and mould was a scourge on the city and that no one should have to live with it. She said that they had been prepared for Awaab's Law with a team contracted. She said that they had requested residents report damp and mould to them. Mikila Beck added that they had written to all residents prior to Awaab's Law coming into effect. She said that they recognised that some residents felt a sense of shame at having damp and mould and so they approached the issue sensitively. She said that they worked with residents to find the cause and then to find a solution that worked for them to resolve it.

6.8 Cllr Miller asked what category one hazards were and why certain things that seemed very serious were not category one. Mikila Beck said that category one hazards posed a significant impact on health or death and were treated as emergency repairs. She said that the Housing Health and Safety Rating System looked at the likelihood of something happening and the impact of it happening which then produced the ranking.

6.9 Cllr Miller asked if damp and mould was cleaned away and repainted if that counted as a repair. Mikila Beck said that it was a mitigation to the immediate health hazard whilst they looked into the required repairs.

6.10 Cllr Sykes asked about the Personal Evacuation Plans and what was being done about the remaining people without them. He also asked about the relationship between the council and the Building Safety Regulator, and the Bristol Estate buildings being classed as high rise. Genette Laws said that the council had a surprising number of people needing a PEP compared to the number of tenants, potentially over 1000. She said that PEPs were co-produced with tenants rather than done to them. She said that the law requires best endeavours rather than 100% but that they were working as close as possible to 100%. She said that Martin Reid, Director for Homes and Investment had been holding meetings regarding access issues to really understand that and where the council may need to use stick rather than carrot to ensure those residents are safe as well as their neighbours. She said that the Bristol estate was a technical surveying issue and that they were continuing to treat them as high rise in agreement with the fire service. She said that it could take up to 40 weeks to get a decision from the regulator, and that they were focusing on applications for new builds and works towards buildings rather than building safety casework. Stephan Scheiner said that people needed to self-identify their need for a PEP and numbers may fluctuate as people's needs change, or people move in or out. He said that they were treating all of their blocks over the 18 metres range as high rise and having a cautious approach, exposing them to the long waits of the building safety regulator applications.

6.11 Mark Strong asked about tenant engagement and notice boards that were very out of date. Genette Laws said that she was happy to discuss the issue with tenancy services, but that on some estates notice boards were lead by tenant reps rather than the council. She would like something more digital and were looking at refreshing the tenant handbook with things like QR codes to keep information up to date.

6.12 Cllr Winder asked about the backlog of works and when it could be considered to not be a serious backlog. Mikila Beck said that hopefully they would be at that point in a few months' time. She said that the outstanding work depended on the number coming in and that their proactive work to encourage reporting had increased the amount of work. She said that they would require under a month of work to not be a serious backlog and at the moment were at six weeks of work, so were getting there.

6.13 Cllr Meadows said that good work was being done with sensible solutions that she would agree with.

6.14 Cllr Wilkinson asked why asbestos compliance had fallen to 89.6% and domestic lift and stair lift servicing had fallen to 66.7%. Mikila Beck said that asbestos was a rolling program where they had re-inspected communal areas, and that it was not a significant concern. She said that they would get back to the committee regarding the lifts.

6.15 Michael Creedy asked about older people in sheltered housing having to self-identify for PEPs. Genette Laws said that it was slightly different in sheltered housing then general housing and that residents in sheltered housing would not be expected to self-identify as the scheme manager should do this.

6.16 Cllr Miller said that there were small pockets of council homes across the city and that councillors should get information of where these properties were so that they could engage with residents. Cllr Williams said that residents were connected via the area panel meetings and that there was a map of properties. Genette Laws said that the acquisitions of council

properties have been a success meaning there are more council homes in different areas. She said on request from members they have shared GIS mapping. Mikila said that these tenants were connected to area panels and that they were engaging with them regarding repairs. She said that teams were out in the community in different spaces to connect with people.

6.17 RESOLVED - That the Place Overview & Scrutiny Committee note and comment on the progress made in addressing the issues identified by the Regulator of Social Housing.

7 CITY PLAN UPDATE

7.1 Cllr Jacon Taylor, Deputy Leader of the council and Cabinet member for Finance and City Regeneration presented to the committee. He was joined by, Max Woodford, Director for Place, and Steve Tremlett, Planning Policy and Heritage Manager.

7.2 The Chair said that it was strange that the city plan was not looking at the new areas that will be coming into the city as part of Local Government Reorganisation and the timing of the new National Planning Policy Framework. Cllr Taylor agreed that it was strange and said that the timing was slightly awkward. He said that they had raised the issue with government and if they were to wait for LGR then they would not even be able to start the process until after vesting day in 2028. He said that they would be in a situation where there were two plans, one for the city on its current boundary and the parts coming into the city would work from the current Lewes District Council local plan. Max Woodford said that Cllr Taylor was right and that there had been lots of noise and complaints about this to the government as there were lots of other areas in the same situation. He said that government were aware of the issue and were working on transitional arrangements. On the NPPF he said that a draft had been published and the final new NPPF was coming in due course, probably after the summer recess.

7.3 Cllr Fishleigh asked what the city's housing target was and how we were getting on with it? Steve Tremlett said that the current local plan had a housing target of 13,200 homes between 2010 and 2030, which averages 660 per year. Actual housing delivery has been below this and the target wouldn't be met by 2030. He said that there wasn't a housing target in policy in the new plan yet. However, they did have a figure from the housing need figure which came from the government's standard method for calculating housing need, which was the starting point they needed to try to meet through the new plan, and this was approximately 2,500 homes per year. This is significantly higher than the target in the current plan.

7.4 Cllr Fishleigh asked about housing targets for the city when the new mayor was meant to be taking a holistic approach across the whole of Sussex and Brighton. Cllr Taylor said that was where we would end up but weren't there yet. He said he would love to be delivering the housing target of 2,500 homes, with a good chunk being affordable, but that most people in the room would know its highly unlikely given land availability in the city. Steve Tremlett said that the new city plan is coming ahead of the spatial development strategy that the Strategic Authority would be producing and that meant they would have to use the government's standard method for calculated housing needs as a starting point. He said that once there is a spatial development strategy in place the Strategic Authority may move those numbers around depending on where there is capacity, which may then give the city a different number to meet and plan for, but that would be for the next review of the City Plan after this one.

7.5 Cllr Miller asked why they could not push the dates back a month if the new NPPF was due to be published shortly. Cllr Taylor said that they were driven by government pushing them to

go fast and had funding to do so. Steve Tremlett said that a draft NPPF was published earlier this year and is able to be used for the early stages of plan-making and that a commitment had been made to government to give notice of the intention to prepare a new plan by 30th June in order to secure additional government funding.

7.6 Cllr Miller said that by the time of the consultation between gateway two and three the city footprint would be expanded and asked if the new residents would be able to take part in the consultation. Steve Tremlett said that this was unknown and that they were awaiting transitional regulations from government.

7.7 Mark Strong said that previously there had been engagement with schools and hoped that it would happen again. Steve Tremlett said that it was unfortunate that the deadlines meant that the consultation was over the summer but said that they weren't starting from scratch – input received during the previous consultation with young people would still be considered. Max Woodford said that they would be engaging with school during later stages of consultations on policy.

7.8 The Chair said that the city plan was so important and has a big impact on future development, but that people don't always realise and complaint when planning applications are approved having not engaged in the city plan process has set certain policies or allocated certain sites. Cllr Taylor agreed and said that both he and the Chair had been doing work on this around the number of HMOs in their ward.

7.9 Cllr Cattell stated that having worked in planning she understood that a local plan is a lengthy process and that things changed during that time, including the NPPF and LGR. She said that she was pleased to be a on a member working group looking at the issue. She thanked Steve Tremlett and the planning staff for their hard work.

7.10 Cllr Lademacher asked for the cost of the current plan and extra costs once the city boundaries were expanded. Cllr Taylor said that it may be difficult to estimate the cost of a plan including things like officer time, commissioning studies, and consultation events. He said that expanding the city would not mean a huge increase in costs. Max Woodford said that additional costs once the city was expanded would depend on the evidence coming from the new areas and that the sooner the government gave them transitional arrangements the better. Regarding the total cost of the plan, he said that it was really hard but about £1.6m across the life of the plan (this estimate is in the May 2026 cabinet report).

7.11 Cllr Wilkinson welcomed the progress made. He asked how scrutiny would be involved and how the previous consultation outcome calling for genuinely affordable and social housing would be reflected in the plan. Cllr Taylor said that it was essential that they came back to scrutiny with a draft set of policies and site allocation when they got to that stage. He said that it was great that there was such a desire for genuinely affordable and social housing in the initial consultation and that how that is reflected in policy requires evidence. He said that they could put in a policy that all private development had to include the equivalent of social housing at local housing authority rates but that it wouldn't be upheld as a policy without evidence and studies to support it, and that it clearly wouldn't be viable for all private sector housing. He said that they would be pushing the boundaries of what they could achieve but that all policies had to be evidence based.

7.12 RESOLVED – Place Overview & Scrutiny notes the progress to date and future timetable for the new City Plan.

8 REPORT OF THE HERITAGE TASK & FINISH GROUP

8.1 The Chair presented the Heritage Task & Finish Group report to the committee setting out what they had achieved, how they confined themselves to protecting heritage assets and working with partners, and how interesting the witnesses were to talk to. She hoped that committee members would agree to pass the report on to Cabinet.

8.2 Cllr Fishleigh asked about the recommendation on a statue to First World War Indian soldiers at the Royal Pavilion, as it didn't really fit with the others. The Chair said that it came from speaking to one of the witnesses who was a trustee of the Royal Pavilion and also the Chatri memorial. She said that the use of the Royal Pavilion as a hospital for Indian Soldiers in the First World War was an important part of the building's history and comparing it with conversations they had on preserving the regency history in aspect or reflecting changes over time, saying that new and old could co-exist side-by-side.

8.3 Mark Strong said that it was a great experience to be part of the Task & Finish Group and said that the report recommendation was to send it to a 'future' cabinet and hoped it would not be forgotten about. He also asked if some of the recommendations that were considered 'quick wins' could be passed straight to departments rather than taking time going through cabinet. Giles Rossington, Scrutiny Manager, said that the term future cabinet just meant not the next cabinet as that might already be planned and there may not be time to go through the recommendations and prepare a report, but that cabinet took scrutiny very seriously and would not forget it. He said that the council could not have a system where departments were doing things at the behest of scrutiny members rather than cabinet. He said that once cabinet had approved or rejected each recommendation there would be regular updates to committee to track the progress of the approved recommendations until committee were satisfied.

8.4 Michael Creedy commented that within the next ten years they would be coming up to a celebration of the founding of the co-operative movement, not just in the north but in Brighton & Hove.

8.5 Cllr Cattell said that she had really enjoyed being a part of the group, had learnt a lot, and really enjoyed hearing some of the micro stories from places like the Pepper Pot. In reference to Cllr Fishleigh's previous question on a statue to commemorate the First World War Indian soldiers at the Royal Pavilion, she said that any statue would require planning permission. The Chair commented that they also needed to raise their own funds for any such statue as the Task & Finish Group was not recommending that the council fund it.

8.6 Cllr Miller commented that having previously been cabinet member for heritage she has really enjoyed being a witness for the Task & Finish Group.

8.7 Cllr Wilkinson said that the report had 15 recommendations, which was a lot and asked if the group put any priority on them. The Chair said that it was an interesting point and that it would go to cabinet after relevant council officers had looked at it and determined which were easier, more difficult, or undeliverable.

8.8 Cllr Miller asked if committee would get to look at the report before cabinet. The Chair said that it would go to cabinet and then they would receive ongoing updates after this.

8.9 RESOLVED - Place Overview & Scrutiny Committee notes the Task & Finish Group report on Heritage attached as Appendix 1.

RESOLVED - Place Overview & Scrutiny Committee refers the findings of the Task & Finish Group on Heritage to Cabinet for consideration.

9 VISITOR ECONOMY TFG SCOPING REPORT

9.1 The Chair introduced the report on the next Task & Finish Group saying that she had sought votes from committee members on the three ideas that had come from the previous discussion on what members wanted to look at. She said that all of the ideas had received some support, and the others may be looked at in the future, but that visitor economy had received the most support and therefore the report sought the committee's approval to establish the Task & Finish Group.

9.2 Cllr Cattell said that there was an overlap with licensing and as Deputy Chair she would therefore like to be on the Task & Finish Group.

9.3 Cllr Goddard said that looking at the scoping report there was not enough emphasis on that nighttime economy was not just about pubs and clubs, but early evening entertainment. He said he wanted greater emphasis on our assets such as Brighton Town Hall, which he felt was an embarrassment unless you wanted to get married there. He highlighted Rochdale Civic Centre as an example of what could be done. Cllr Cattell mentioned that Brighton Town Hall was on the long list of major projects, but that it was a question of money as there was so much wrong with the building.

9.4 Cllr Miller said that she had ideas for potential witnesses that she would send via email.

9.5 Cllr Fishleigh asked about limiting the numbers in the group, and if it would be the same as previously and asked if the scoping meeting could be arranged imminently in case people were on holiday during August. Giles Rossington said that the numbers on Task & Finish Groups roughly reflected the political composition of the council and were three Labour members, one Green, one Conservative, one Brighton & Hove Independent, and co-opted members who were interested in joining. He said that once nominations had come in from all the political groups the meeting would be arranged and they weren't looking to wait until September.

9.6 RESOLVED – Place Overview & Scrutiny Committee agrees to establish a Task & Finish Group to scrutinise the visitor economy of Brighton & Hove.

RESOLVED – Place Overview & Scrutiny Committee agrees the Terms of Reference, membership and duration of the Task & Finish Group as set out in Appendix 2.

10 DEVOLUTION UPDATE

10.1 Cllr Bella Sankey, Leader of the Council presented to the committee. She was joined by Tom Cottam, Head of the Cabinet Office.

10.2 Cllr Wilkinson asked how the committee would receive ongoing updates and how the council's scrutiny committees would compliment the SBSA scrutiny. Cllr Sankey said that it had been sometime since her last update on the issue to scrutiny and that she was happy to come back as often as committee wanted. She said that the Strategic Authority Board would be meeting monthly. She said that councillors from BHCC would be involved in scrutiny at the strategic authority and that it was important that elected members in Brighton & Hove know what is going on and get regular updates.

10.3 Cllr Sykes asked about the funding figures in the slides and how they added up, saying that it seemed very front loaded. Cllr Sankey said that there was a budget they were receiving as part of the investment fund of £1.4bn over 30 years and some of that was being released in the pre-mayoral stage, and that they wouldn't get the full regular amount until the mayor is in place. She said that they were also receiving funding that was being passported to local authorities such as transport and skills, which may be where the discrepancy is.

10.4 Michael Creedy asked about the challenge of treating each part of the large area of Sussex equally. Cllr Sankey said Sussex was made up of clearly varied and unique communities, that they were not all the same and shouldn't be treated the same due to their varying needs. She said that nonetheless they are stronger together focusing on challenges and thinking strategically across Sussex. She said that people across Sussex wanted many of the same things such as good transport, good healthcare, and good jobs.

10.5 Cllr Winder spoke about the huge opportunities and asked how they can stop people feeling that they have lost some democracy or are being left behind. Cllr Sankey said that devolution was happening alongside local government reorganisation, which caused confusion, and meant that they needed to explain this to people. She said that they had not wanted huge unitary authorities in Sussex, which is why they had asked for five in Sussex, and that the government was minded to go for four. She said that people can feel more connected to unitary authorities as there is no confusion about which council is responsible for what, and which councillor to contact. She said that she was pleased that the government had brought back the supplementary voting system for mayoral elections. She said that Greater Manchester was a good example of when it is done right people can feel empowered.

10.6 Cllr Fishleigh asked how it would impact the local plan and whether housing targets would be set by government or the mayor. Cllr Sankey said that the local plan and planning would remain with local authorities.

10.7 Cllr Goddard agreed with Michael Creedy's point about connecting places across the county. He said that it takes a different type of politician and culture to do devolution well. He said that they did not have a decade to do devolution well as other places had. Cllr Sankey agreed that they did not have a decade to do devolution. She said that they had made a lot of progress in the last two years, which showed the accelerated pace they were working at. She said that it was incredible how far they had come, especially with both East and West Sussex County Councils changing administration during the process.

10.8 Mark Strong spoke about the work in other strategic authorities across the country and the need for building capacity with stakeholders such as the county's universities and the national park authority. He also asked about passporting funding and how this would be decided. Cllr Sankey said that it was important that they did not try to copy the work of any one place as there was lots of good work across combined authorities, as well as things that hadn't gone so

well that they could learn from. Regarding stakeholders she said that now the SBSA was established there would be more scope to bring people in. She said that there would be associate members of the strategic authority board, including the chair of the South Downs National Park. She said that they were establishing a business board to bring in key businesses and that she would be happy to take away the points about civic society. She said that passporting would evolve and at the moment they were following government formula.

10.9 Cllr Miller asked if fire and rescue services would continue to operate as east and west or if they would merge and asked about growth hubs. Tom Cottam said that the fire services had started the transitional arrangements and were looking at how it would work operationally. He said that the strategic authority was receiving funding and would look at what the needs of businesses are.

10.10 Cllr Miller asked about the ways for overview & scrutiny committees to feed into the strategic authority. Tom Cottam said that he would get back to the committee on that and that the nominations from each local authority to the strategic authority scrutiny roles would provide that connection.

10.11 RESOLVED Place Overview & Scrutiny Committee notes the update to members on Devolution.

The meeting concluded at 6.43pm

Signed

Chair

Dated this

day of

BRIGHTON & HOVE CITY COUNCIL

PLACE OVERVIEW & SCRUTINY

11.00am 28 JULY 2026

MINUTES

Present: Councillor Evans (Chair) Goddard, Lademacher, Meadows, Miller, Sykes, Winder, Mackey and Parrott.

Other Members present: Mark Strong.

PART ONE

11 PROCEDURAL BUSINESS

11 Procedural Business

11a Declarations of substitutions: Cllr Parrott for Cllr Cattell. Cllr Mackey for Cllr Wilkinson.

11b Declarations of interest:

11c Exclusion of the press and public:

Amongst the papers circulated to elected members were confidential (Part 2) papers from the Cabinet Meeting. Any discussion of these papers will need to be in confidential session and will need to exclude the press & public from these discussions. We will move into a Part 2 confidential session towards the end of the meeting, if members indicate that they wish to discuss information shared in the Part 2 papers. All committee members are reminded not to raise matters contained in the Part 2 documentation during the public meeting.

11.1 Cllr Miller raised that she had not received the Part Two documents. Giles Rossington, Scrutiny Manager, said that members had been sent the documents and any access issues were down to individual member access issues.

11.2 Mark Strong raised a point of order regarding public engagement for call-in meetings as the meeting was arranged and the agenda published after the deadline for public engagement. Giles Rossington said that as with any public engagement submitted after the deadline it would be at the Chair's discretion to accept any public engagement.

11.3 Cllr Miller raised that Appendix three was missing from the report. Giles Rossington said that Appendix three was the minutes of the cabinet meeting and was due to be published this morning but was held up due to technical issues. He said that the minutes of the cabinet

meeting were skeletal and essential said that a discussion was held, and a decision was made and therefore would not add much to the committee's decision-making process today.

11.4 Cllr Sykes noted that the chair had said that discussion had been held with key people regarding the timing of the meeting, and wanted to know who it had been discussed with. The Chair said that those who were essential for the meeting to be held had been in discussion, including herself, Cllr Taylor as the relevant cabinet member, and officers who had worked on the decision. She added that most members had not been consulted and that the meeting had to be held within seven days of the acceptance of the call-in request and so it was a challenge to fit in a meeting.

11.5 Cllr Goddard said that due to the short notice of the meeting he was grateful to the substitutes who had come and to Cllr Taylor who was actually on annual leave but had come in to answer the call-in. He made the point that scrutiny's role was to look at the process of decision making not the history of New England House and that he was interested to hear what was wrong with the decision-making process. The Chair said that the grounds for the call-in request were set out in the appendices and included a lack of information on which to base the decision.

12 CHAIR'S COMMUNICATION

12.1 The Chair gave the following communication:

I'd like to thank everyone for attending this urgent call-in meeting at such short notice. This was unfortunately the only possible slot for a meeting that fitted with constitutional requirements and the availability of key people.

I'd like to start off by briefly explaining the purpose of a call-in meeting. If anyone has any questions, I'm sure that Giles will be happy to respond.

Call-in is an essential, and legally required, part of any Leader & Cabinet governance model. The council has to have a process in place that allows non-executive members to challenge a decision of the executive, after it has been taken but before it has been implemented.

Call-in is not intended to be used frivolously or simply because members disagree with a decision. For a call-in request to be accepted, the members requesting the call-in must detail why they think the executive decision was flawed. The Council's procedure rules list a number of legitimate grounds for call-in, as well as requiring that a call-in request be signed by at least 6 members from at least 2 political groups.

If a call-in request is made, and if the request is accepted by the Chief Executive, after consultation with the council's Monitoring Officer, then a meeting of the relevant Overview & Scrutiny committee must be arranged within 7 days of the submission of the call-in request. We are here today because a call-in request has been submitted and accepted.

At the call-in meeting, the committee will hear from one of the members who submitted the call-in request – in this instance Cllr Sykes. As Ollie is also a member of this committee, he is able to present the call-in request and play his normal role in the meeting.

The committee will then hear from the relevant cabinet member, in this instance Cllr Taylor; and from officers if a detailed explanation of issues is necessary.

After this, committee members will have the opportunity to ask questions of the Cabinet Member to assist the Committee in reaching its decision on the call-in. The Cabinet Member may refer to officers to provide the response as they consider appropriate.

Having heard from the member requesting call-in and from the Cabinet Member and officers, and having had the opportunity to ask questions of the Cabinet Member and officers, committee members will then debate whether to accept or reject the call-in.

Members will note that one of the possible actions for the call-in committee is to refer the Cabinet decision to full Council. Just so we're clear, an O&S committee can refer a decision that has been called in to Council, but only if the committee believes that the decision was contrary to the budget and policy framework previously agreed by Council. There is no role for Council in determining call-in requests other than in this context. As today's call-in request does not suggest that the New England House decision was contrary to the budget and policy framework, I think it's unlikely that we'll want to refer to Council.

There are two other options. The committee can decide that the original executive decision was properly made, in which case the decision may be implemented immediately. Or it can decide that the original executive decision was not properly made and refer it back to Cabinet for re-consideration. If the committee chooses to refer the decision back to Cabinet, members must agree reasons for the referral.

It is very important for members to bear in mind that they are not being asked to debate the merits of the original executive decision. Rather, they are being asked to consider whether the Cabinet decision was properly made, given the concerns about process outlined in the call-in request.

I appreciate that members will need some context in order to make the decision on whether to refer the decision back to Cabinet or not, but I do ask that we try to limit questions to the process of decision-making. I will stop questioners if they are veering too far from the brief of the committee.

Also, the call-in request is clear that the decision that members have concerns about is the decision to sell New England House. However, the asset strategy report considered by Cabinet also includes decisions around the disposal of the Hove Park site and some other sites. I don't want to keep people here today for longer than necessary, so I want to be clear that the focus of today's meeting is New England House.

I am also keen that we conduct as much of this meeting as possible in public session. When we come to questioning Cabinet members and officers, I would therefore strongly request that members think carefully and reserve any questions about confidential papers until there are no more questions that can be taken in public session. This is not to impede the democratic process, but rather to ensure that we do nothing that might compromise the completion of contractual negotiations.

If members do need to discuss confidential papers, this will need to be in Part 2 session. This means that the press and public will be excluded from this part of the meeting. Members have had the confidential report from the Cabinet meeting shared with them. A decision was taken

by the Monitoring Officer that this report should be redacted to remove particularly sensitive information that was not considered relevant to the call-in. This is in accordance with the Council's Constitution Part 3E Point 23.3 which states that confidential documents should not be shared with scrutiny members unless this information is relevant to their enquiry. The information redacted relates to the non-New England House elements of the asset strategy report which are not relevant to this meeting which is focused on New England House. No material relating to New England House has been redacted.

Finally, when the committee comes to decide whether or not to refer the Asset Strategy decision back to Cabinet, only voting members, that is Councillors, will vote. Non-voting members are otherwise welcome to play a full part in questioning and debating the issue.

13 PUBLIC INVOLVEMENT

13.1 There were no public engagement items.

14 MEMBER INVOLVEMENT

14.1 There were no member questions.

15 CALL-IN OF 16 JULY CABINET DECISION: ASSET STRATEGY

15.1 Cllr Sykes presented the call-in request to the committee. He said that the call-in was made on three specific grounds: to what extent was it a strategic decision and did we have enough information to make that strategic decision; New England House was a flagship proposal under the City Deal. He said that it was a major blow to lose New England House and was there a chance to rescue it, had all stones been overturned to seek a way forward to retain this asset. He said that the location and nature of the space was critical and some of the alternatives suggested were scattered, smaller, and not the same sort of spaces. Cllr Sykes said that there were questions about which legislation applied, either 2021 or 2026. He wanted to know what flexibility the council had to meet with and discuss ways forward with Friends of New England House to extend the period of consultation and meet some of the requirements under the 2026 legislation. He asked what the added value of the space and its contribution to the wider economic ecosystem of Brighton & Hove was. Cllr Sykes believed that the options in the cabinet paper and the information there was limited. He said there were two options, possibly do nothing was one of them, a £67m option and a £97m option. He said in his experience there should generally be more than that as a minimum set of options. He asked where the new minimum option that was available previously was. He said that he thought it was a bit of stretch that nothing could be done with New England House for less than £67m. He wanted committee to be reminded of the previous options and a do minimum option which combined with community involvement maybe there was a way through to preserve the asset. Cllr Sykes said that the potential contribution of the strategic authority should be considered and that this was not reflected in the report. He asked to what extent was New England House a strategic asset and if it merit approaches to the strategic authority in order to seek alternatives to disposal.

15.2 Cllr Jacob Taylor, Cabinet Member for Finance and City Regeneration responded to the call-in. He was joined by Jessica Hamilton, Interim Head of Strategic Property, and Nick Fishlock, City Regeneration Programme Manager. Cllr Taylor said that he would be brief as he

did not feel there was much merit to the call-in and felt it had been thoroughly discussed in cabinet and full council.

He went through the grounds for the call-in saying that the lack of clarity of previous funding had been discussed in cabinet and that he could set out the full history of the funding for New England House, but that it was not germane to the decision of what to do with New England House. He said that when thinking about assets they didn't necessarily set out when they were purchased and how they were financed. He spoke about the £4.9m of City Deal received back in 2014 and held for a while alongside a possible project to refurbish New England House. He said that interestingly the £4.9m was released to support other corporate pressures in the budget setting process in 2021/22 when the council had a Green administration with Cllr Shanks as Deputy Leader of the Council. Regarding the potential of community interest, he again said that it had been well covered in cabinet.

He said that an application was made for a potential asset of community value, and that there had been confusion on both sides about the current and statutory status of that because changes had been made in the English Devolution Bill, but that the new powers in legislation had not come into force as they were waiting secondary legislation. He said that therefore a decision was made on the existing statutory parameters, and at the cabinet meeting it was confirmed that a decision would be made. He said that the decision on the asset of community value was not a cabinet member decision, but a quasi-judicial decision made by the Head of Planning. He said that the decision had been turned down and the reasons for that set out to the group. He said that the application didn't demonstrate social value but did demonstrate economic value. He said that it was not a decision that he would endorse or defend as it was not his decision but purely a planning process decision. He noted that the group would be looking to resubmit or appeal the decision. Cllr Taylor said that it was not noted in the cabinet report, but it mattered whether an asset was an asset of community value at the point that the council may dispose of it as the group would be contacted first and have a right to submit. He said that it was procedurally correct that they didn't notify anyone at the time of the decision as it was not registered as an asset of community value.

On the lack of consultation Cllr Taylor said they wouldn't generally consult on asset decision as in theory there could be a broad range of people that could be consulted. He said the council don't really do consultation or public consultations with previous tenants or prospective tenants when it makes decisions on its asset portfolio in line with the Asset Management Plan. He said that this had no impact on the decision made and that the decision was subject to the usual public engagement for cabinet decisions and that people did come and ask questions or deputations at cabinet.

Cllr Taylor said that in his view the three grounds stated for the call-in were not relevant and don't impact the decision whatsoever.

15.3 Cllr Miller raised the importance of the create maker space and light industrial space at New England House. She said that at 3.13 in the cabinet report it suggested that the city would be losing 16,000m² of light industrial space and 3.13 suggests that 30,000ft², which translates to about 2,500m² of office space without any loading bay access which would not be a suitable replacement. She said that the disparity between the two needed to be recognised because they were completely different in terms of volume and offering. Cllr Taylor said that the report did not say its replacement and that the reprovision of employment space sits within the planning system. He said that the council or anyone who was to purchase an asset it is then

subject to planning policy. Cllr Taylor said that the report said that they would commission a developer brief alongside the potential disposal of the asset within which provision of a new space might be a combination of housing, creative employment etc. He said that this would be subject to a planning application and planning is where the space could be protected. He said that the other spaces were included as the decision aligned with a time when they had a fair amount of vacancies and it was deemed relevant to put those in and then actively market them to previous tenants. He wanted to be clear that the report did not say that it was a like for like replacement.

15.4 Cllr Miller said that she was concerned that City Plan did not require light industrial space to have adequate loading access, meaning that what planners deemed to be light industrial space was functionally unusable because machinery and equipment could not be moved in. Cllr Taylor said that was a planning policy question and not relevant for the call-in, but that he didn't disagree with the point.

15.5 Cllr Goddard spoke about the many things that scrutiny wanted to talk about around the issue of New England House. He spoke about his time as economic advisor to cabinet saying that it was the most frustrating part of his brief, and asked who was in charge of the council when the £4.9m funding from the City Deal was redesignated. He said that a lot of the issues were being sorted out by Cllr Taylor. He said that cabinet were forced to make a big decision and that the building was dangerous having had to be evacuated. He said that people could romanticise the issue as much as they liked but it was not creative industry in the 1960s but light industry. Cllr Goddard said that he was convinced that this call-in was very confused and was playing politics. He said that we should lament the loss of the space but should put energy into the future use and developer brief. Cllr Taylor spoke about the do-nothing option mentioned by Cllr Sykes and said that there had been too much of the do-nothing option over many many years in the city, with a number of assets. He said that this was not pointed at Cllr Sykes or any administration in particular. Cllr Sykes made a point of order that he had not called for a do-nothing option, but a do minimum option. Cllr Taylor said that too much of the do-minimum option had been taken for many years. He said that any number of options could be put into a report but asked what the point would be in including an option to do-minimum or do-nothing in a fire safety report referencing the dangers. He said that Cllr Goodard was in many ways right and overall it had been a story of failure, which was why he had commissioned the lessons learned report. He said the lessons learned report was clear about organisational and project management failures and these were lessons that council needed to learn.

15.6 Cllr Lademacher asked about the process that had happened around the asset of community value application. Cllr Taylor said that cabinet had met on the 16th of July and no decision had been made, on the 24th of July a decision was made to reject the application. He said that the group had emailed to say that they would be resubmitting or appealing the decision and therefore it was not a live application in the sense that it was being considered.

15.7 Cllr Lademacher said that there was tension and interest in the community and asked what the council would give way on. Cllr Taylor said that in any asset disposal there were always trade-offs. He said that one option was to cut front line services to balance budgets. He said that they had tried to be transparent about using capital receipts to fund things out of the general fund or to fund proactive work. He said that there were a range of valuations and that they could get the largest capital receipts selling subject to planning consent, meaning that the money was only handed over when planning was approved, or they could sell assets where

the same use would continue with a stable income, such as a row of shops. At the other end of the scale was selling with constraints such as a developer brief setting out what was needed on the site such as some housing, some creative spaces, or public realm. He said the more requirements that were in a developer brief the lower capital receipt would be received.

15.8 Mark Strong said that the biggest issue was about ownership. He said that Friends of New England House had been looking at the possibility of the Strategic Authority using funding. He said that the Friends of New England House think it is premature but want to be involved in the development brief. He made the wider point that in many instances consultations were seen a process to get through rather than a means of working together. Cllr Taylor said he wouldn't agree with everything that was said as although over the years the council had not been great at engagement, he felt it had got better and highlighted work on SEND reform and home to school transport as work where consultation and engagement had been good. He said that this does take time and resources. However, it does not change the decision. Mark Strong said that a new application for New England House to become an Asset of Community Value would be submitted.

15.9 Cllr Parrott asked about the minimum that the council could do on New England House. Nick Fishlock said the in March 2025 cabinet had been presented with six options including: a full refurbishment in an empty building, full refurbishment with tenants in occupation, full refurbishment with three storey extension, and demolition with either small, medium, or large size building. He said that they had gone through the options and options paralysis by going further and further. He said that the minimum would have been a full refurbishment in an empty building which would have cost nearly £29m but included risks such as only a 20-year life span. He said that the £67m option included more improvements, a greater life span, and changes to accessibility. Cllr Parrot asked if in his professional opinion the options given were a responsible minimum option to the council.

15.10 Cllr Sykes said that he was worried by Cllr Taylor's response to him regarding the do nothing or do minimum options. He said he understood about the six options, but the question for scrutiny was whether there had been enough information in the cabinet paper, which only included two options. Cllr Taylor said that a fire safety report had highlighted a catastrophic fire risk and they therefore couldn't do nothing or just do the minimum. He said that there was no legal ability to do nothing and that cabinet had been given the two most reasonable option. Cllr Sykes said that the 'do minimum' was very clear: 'the lowest cost intervention necessary to meet fundamental legal, safety, or operational requirements when absolutely inaction is impossible'. He said it was not do nothing and was clearly defined in the Green Book. The Chair said that that had been covered by the previous cabinet paper of March 2025 mentioned by Nick Fishlock.

15.11 Cllr Meadows said that the council has the responsibility to seek value for money, and that the concern of the call-in was that cabinet did not have all the information required to make the decision. She said in 3.15 it mentioned the site being disposed of with a developer brief and asked if it would require changes to the City Plan, and if the money raised would go to housing. She said the best value they could get for the asset hadn't been included and that information would have helped them to make the decision. Cllr Taylor said that they didn't need to change City Plan and could proceed as it is. On best value he said that implied in the report is that the council's recommendation for best value is to proceed on this basis. He said it isn't as simple as that because they could sell things for the best value but that they had other considerations such as economic factors, housing factors, etc. Jessica Hamilton said when

considering best consideration they also had to think about the impact of social, environmental, and economic benefits in any asset disposal and it would be a balance.

15.12 Cllr Winder asked about making decisions based on one building when the wider area was crying out for investment and attention. She spoke about the need to look at the wider area surrounding New England House. Cllr Taylor said that he agreed 100% and that they did need to think about the wider area and not just one building. He said that there was a whole area of possibility that may get turned into a master plan.

15.13 Cllr Goddard said that the question should be: was this a properly made decision. In his view, he said, the answer was yes.

15.14 Mark Strong spoke about the strategic authority, the spatial economic strategy, and that Cllr Sankey and Cllr Taylor were Chair and Co-Chair of the strategic authority, which had not been mentioned in the report. He also said that the wider Elder Place corridor plans had gone quiet. Cllr Taylor said that the plans had not gone quiet, that Elder Place was proceeding, and that New England House did not prevent this. He said that the strategic authority's spatial economic strategy the timing was different as it would not come until after the adoption of the new City Plan.

15.15 The chair said "We are now ready to consider the report recommendations.

Having regard to the grounds for call-in and the information supplied in response:- Does the committee agree:

2.1 To determine that the challenge to the decision called-in should be taken no further and the decision may be implemented; or

2.2 To determine that that the decision called-in is contrary to the policy framework or contrary to or not wholly in accordance with the budget framework and that is should therefore be referred to full Council. In such a case the Committee must set out the nature of its concern to full Council; or

2.3 To refer the decision called-in back to Cabinet for reconsideration. In such a case the Overview & Scrutiny Committee must set out the nature of its concerns for Cabinet." The Chair asked for opinions from committee members.

15.16 Cllr Sykes said that he believed that they should approve recommendation 2.3 as the options put to cabinet were not the full options.

15.17 RESOLVED – Place Overview & Scrutiny Committee determines that the challenge to the decision called-in should be taken no further and the decision may be implemented.

The meeting concluded at 12.25pm

Signed

Chair

Dated this

day of

Brighton & Hove City Council

Place Overview & Scrutiny Committee

Agenda Item 21

Subject: City Plan: Balancing Homes and Employment Land

Date of meeting: 8th September 2026

Report of: Chair of Place Overview & Scrutiny Committee

Contact Officer: Name: Natalie Sacks-Hammond

Email: Natalie.sacks-hammond@brighton-hove.gov.uk

Ward(s) affected: (All Wards);

Key Decision: No

For general release

1. Purpose of the report and policy context

- 1.1 Brighton & Hove's Local Plan (known as the City Plan) is the city's key planning policy document. It sets out a vision for the city's future development and evolution. The City Plan will set the direction for how the city will grow and thrive, shaping the places where people live, work and enjoy to create a better Brighton & Hove for all. It will show where new homes and commercial spaces should go, how development should respect the city's unique character and heritage, and how sustainable growth will be matched with the right infrastructure and green spaces.
- 1.2 Members are being asked to input into the discussion on balancing homes and employment land to inform the development of the City Plan and help shape future engagement plans on this topic. Presentation slides can be found at Appendix 1.

2. Recommendations

- 2.1 Place Overview & Scrutiny Committee is being asked to provide feedback on balancing provision of homes and employment land to inform the development of the City Plan.

3. Context and background information

- 3.1 Brighton & Hove's new Local Plan (which will now be known as the 'Brighton & Hove City Plan' rather than 'City Plan 2041' as previously) will, on adoption, be the primary development plan document for the city and will set a clear vision and planning strategy for the city moving forward. It will replace the existing City Plan Part One and Part Two with a single document.

- 3.2 The City Plan is required to plan for and seek to meet the city's housing, office and industrial needs:
- Housing: Need for approximately 2,500 additional homes per annum based on the government's standard method for calculating housing need. The emerging identified supply is sufficient to meet approximately 30% of this need over the plan period.
 - Offices: Evidence shows an overall need for 87,000m² additional floorspace over the period of the plan. This could be theoretically met through the existing pipeline of planning permissions and sites allocated for office use in the existing City Plan which have not yet come forward for development. There is a strong demand for Grade A office suites up to 1,000m², but weaker demand for older stock. A further question is therefore how to support the refurbishment and upgrade of older stock where possible whilst also supporting conversion of genuinely redundant space to residential use.
 - Industrial Space: Need for 56,000m² additional industrial floorspace over the period of the plan. Since 2010/11 16,000m² has been lost and there is a constrained supply of sites.
- 3.3 The amount of land required to meet all of these needs significantly exceeds available supply. There is pressure on industrial sites from higher-value residential. It is much harder to accommodate industrial floorspace than office space which is easier to reprovide in mixed-use schemes. Office stock needs to be upgraded to meet modern needs.
- 3.4 Policy options include:
- Maintain existing safeguarded industrial sites.
 - Release of some safeguarded employment land for mixed use redevelopment
 - Re-provide industrial space in other locations
- 3.5 The committee is being asked to consider how the City Plan should respond to balance needs. Comments will be used to inform the development of the City Plan and help shape future engagement plans on this topic.
- 4. Analysis and consideration of alternative options**
- 4.1 Not applicable for this report
- 5. Community engagement and consultation**
- 5.1 The feedback provided by Place Overview & Scrutiny Committee will inform the ongoing development of the City Plan. Public consultation will continue throughout the process in line with government guidance.
- 6. Financial implications**

- 6.1 There are no direct financial implications arising from the recommendations of this report which is seeking feedback.

Name of finance officer consulted: John Lack Date consulted: 19/08/2026

7. Legal implications

- 7.1 This report is seeking comments and input from this Committee to help inform the new City Plan. No planning policy decisions are being made through this report, and therefore there are no direct legal implications arising from its recommendations.
- 7.2 In considering the balance between housing and employment land, the Council will need to have in mind national planning policy, identified needs for both housing and economic development and all other material planning considerations. The chosen approach will need to be supported by evidence and justifiable through the plan examination process.

Name of lawyer consulted: Katie Kam Date consulted (20/08/2026):

8. Risk implications

- 8.1 None for this scrutiny report

9. Equalities implications

- 9.1 Decisions regarding the balance between housing and employment land may have differing impacts on residents and workers, including people with protected characteristics. Potential effects on access to housing, employment opportunities and sustainable travel will be considered through the development of the City Plan.

10. Sustainability implications

- 10.1 Decisions regarding the balance between housing and employment land have the potential to affect the environmental, social and economic sustainability of the city. Providing sufficient housing can help meet identified housing needs and support sustainable communities. Retaining an appropriate supply of employment land can support local jobs, reduce the need for commuting and contribute to the city's economic resilience. The City Plan will seek to achieve a balance between these objectives.

11. Health and Wellbeing Implications:

- 11.1 Decisions regarding the balance between housing and employment land may affect health and wellbeing through their impact on housing availability, employment opportunities, access to services and the quality of the local environment.

12. Conclusion

- 12.1 The committee is being asked to consider how the City Plan should respond to balance needs. Comments will be used to inform the development of the City Plan and help shape future engagement plans on this topic.

Supporting Documentation

1. Appendices

1. Presentation slides

City Plan

Balancing Homes and Employment Land

Scrutiny, 8 September 2026



**Brighton & Hove
City Council**

Development Needs

- City Plan is required to plan for and seek to meet the city's housing, office and industrial needs
- **Housing**
 - ~2,500 per annum need
 - emerging identified supply - approx. 30% of need over period to 2044
 - Affordability issues and need for more affordable housing

Offices - use class E (g)(i)

- regionally important location with c.800 office premises (560,000 m²) with 48,000m² of new office space recently added (2013-2023)
- strong demand for Grade A office suites up to 1,000 m²
- Need for 87,000m² more over plan period - in numerical terms this can theoretically be met though existing pipeline (permissions and CPP1 allocations, if delivered).
- But also need to recognise two-tier office market with lower demand for older stock (45% constructed or last renovated before 1950) - consequent increased demand for refurb or new build Grade A

Light Industrial space - use class E (g)(iii)

- 194 industrial buildings (124,000 m²); Since 2010/11 16,000 m² industrial floorspace has been lost
- Constrained supply of sites - no vacant general industrial space
- Assessed need is 56,000m² additional industrial floorspace over the plan period
- Demand for space for Creative industries – artists, messy and maker space, studios and rehearsal space; preference for flexibility (shorter-term leases) and affordability

The Strategic Challenge

- The amount of land required to meet these needs significantly exceeds available supply
- Pressure on industrial sites from higher-value residential
- Office floorspace can potentially be reprovided in mixed-use schemes, but industrial floorspace is much harder to accommodate
- Need to upgrade older office stock to meet modern needs
- How should the City Plan respond to balance needs?

Industrial redevelopment example



Brighton & Hove
City Council

The Council's Industrial Stock

- The city council is a landlord with a number of industrial units.
- Many (e.g. Crowhurst Road, The Hyde in Bevendean and Home Farm) are sold on long leases – but occupied and providing important employment space.
- The council runs Industrial House and Hove Technology Centre. Both need investment to
- Recent Decision on New England House sought to use more of our existing office space for creative industries, artists and makers
- Need for capital receipts does mean that the council must continue to consider it's own portfolio and whether any assets can be released.

Tension plays out through call for sites



Example policy options

Policy approach	Pros	Cons
Maintain existing safeguarded industrial sites	• Supports existing businesses and jobs • Avoids further losses of employment space	• Lower housing delivery • Does not respond to the need for additional industrial space
Release of some safeguarded employment land for mixed use redevelopment	• Can deliver significant housing in sustainable locations. • Employment floorspace reprovided, most likely as offices/co-working	• Loss of existing industrial land exacerbates supply issue at a time of negligible vacant space • Mixed use development unlikely to be suitable for industrial uses • Success of recent mixed-use developments is mixed
Re-provide industrial space in other locations	• Mitigates loss of existing safeguarded industrial land • Uncertainty over delivery of new space	• Only aware of Hangleton Bottom as a possible site • Disruption and possible loss of existing businesses
More permissive of older office space converting to residential	• Increases supply of homes	• Increases need for new office space • May result in unnecessary loss of spaces that could be upgraded

Brighton & Hove City Council

Place Overview & Scrutiny Committee

Agenda Item 22

Subject: Recycling and Behaviour Change

Date of meeting: 8th September 2026

Report of: Chair of Place Overview & Scrutiny Committee

Contact Officer: Name: Natalie Sacks-Hammond

Email: Natalie.sacks-hammond@brighton-hove.gov.uk

Ward(s) affected: (All Wards);

Key Decision: No

For general release

1. Purpose of the report and policy context

1.1 This report provides an update on recycling in the city and outlines a series of measures that will ensure the council delivers on the commitment to provide a reliable refuse and recycling service.

1.2 The council has expanded recycling services, rolled out citywide food waste collections, improved recycling communications and signage, and carried out extensive resident engagement. These initiatives have increased awareness and participation in recycling, contributing to higher recycling rates and reduced residual waste, with current efforts focused on further increasing recycling and reducing contamination.

1.3 More details can be accessed in the presentation which can be found at Appendix 1 and the July Cabinet report at Appendix 2.

2. Recommendations

2.1 That Place Overview & Scrutiny Committee note the report and provide any comments on the proposed work and how recycling might be further improved.

3. Context and background information

3.1 Recycling rates in the city have been historically low and have been falling for several years. The council has delivered a comprehensive programme of service improvements, communications and resident engagement aimed at increasing recycling rates and reducing the amount of recyclable material placed in rubbish bins.

3.2 Key actions have included:

- Launching the “Recycle Right” communications campaign
- Expanding recycling opportunities through the introduction of carton recycling, waste electrical and electronic equipment recycling bins, and the addition of plastic pots, tubs and trays to the recycling service
- Delivering extensive resident communications through council publications, social media, bus stop advertising, housing newsletters and community engagement activities
- Rolling out weekly food waste collections citywide, supported by a dedicated communications programme and household information campaign
- Improving recycling infrastructure through updated bin signage, colour-coded bin lids and a review of signage at recycling points.
- Undertaking face-to-face engagement with residents, including community events, surveys and resident feedback sessions to understand concerns and improve services

3.3 The improvements so far have resulted in a significant reduction in residual waste. With food waste being collected weekly, residual bins are less full, drier, less odorous and present less risk of vermin. The focus is now shifting towards maintaining these improvements, increasing food waste participation, expanding recycling capacity where needed and tackling the ongoing challenge of contamination within recycling collections

3.4 Regular communications regarding the “Recycling Right” campaign are ongoing, aiming to guide and support residents in developing good recycling habits. There will be a review of signage at Recycling Points, face-to-face engagement events will take place in early 2027 and citywide communications will continue to encourage the uptake of food waste collections.

3.5 Addressing contamination remains a key priority, with household rubbish and bagged waste accounting for 49.98% of contamination and glass a further 11.85%. To reduce these levels, a robust contamination policy and supporting operational processes is being developed and will be implemented by Autumn 2026. In-cab technology data will be used to notify residents, via the council website and direct emails, when recycling is contaminated. Communications about new recyclable materials will also reinforce the importance of keeping recycling clean, dry and loose (not bagged), and keeping glass separate.

3.6 Reliable collections are essential if we want residents to recycle to the maximum extent. There are a range of measures being taken to make further improvements to the reliability of the collections service, as described in previous Cabinet reports. These details can be found in the July 2026 Cabinet report at Appendix 2. In addition, a clear set of service standards will be published, that will include:

- Alignment of collection days where possible
- Published service standards to deal with missed collections
- Proactive communication to residents about any service disruption
- Regular publication of performance data

3.7 Additional improvements for the wider service were approved at Cabinet on 16th July and will be implemented, including:

- Additional capacity in Communal on-street service for recycling
- Partnering with other organisations to provide cost neutral collections of additional materials to divert from household rubbish
- New vehicles, including the 'twin-pack' vehicles used for kerbside recycling
- A review of bin capacity across the city
- Investment in Hollingdean depot
- Additional waste expertise to address some of the immediate operational issues
- Additional crews
- Additional performance monitoring to provide immediate assurance about the quality of service

4. Analysis and consideration of alternative options

4.1 The Place Overview & Scrutiny Committee is invited to note the report and provide any comments on the proposed work and how recycling might be further improved.

5. Community engagement and consultation

5.1 Behaviour Change Network surveyed residents from April – May 2026. There were 1,674 respondents, of which 91.8% were aware that plastic pots, tubs and trays can now be recycled and 72.2% were already using the food waste collection service.

5.2 Further resident sessions will take place across the city to address concerns and support rubbish and recycling. Residents will be consulted on the redesigning of rounds and there will be continued engagement with frontline staff.

5.3 Engagement will continue and focus on the delivery model, including container capacity, assisted collections, households with medical or additional waste needs, communal and complex properties, side waste, contamination, service guarantees and accessible communications. Resident feedback will be used alongside operational modelling, waste composition evidence, equalities assessment and staff insight to shape the service going forward.

6. Financial implications

6.1 At this stage, no specific offsetting savings have been identified to fully mitigate the pressures generated as a result of this work. The £1.3m investment agreed as part of the July Cabinet is additional over and above

the current forecast position and so adversely impacts the financial position of the council.

- 6.2 The financial risk associated with these proposals has been reflected within the corporate financial risk position reported through TBM, but not part of the forecast.
- 6.3 Whilst the proposals increase in-year financial pressure, they are expected to contribute to improved operational performance and enable the transition to a more sustainable and efficient service model over the medium term, including planned changes to collection arrangements. This will enable the service to deliver the alternate weekly collection model, which is estimated to deliver approximately £0.5m in savings with £0.375m expected in 2027/28, the remaining the year after. The payback for this investment based on the full £0.5m savings expected is within 3 years.
- 6.4 Due to the absence of any other funding options, any new proposals in addition to those agreed at July Cabinet will increase in-year financial pressure, and will be reported through the councils TBM process.

Name of finance officer consulted: David Wilder Date consulted (27/08/2026):

7. Legal implications

- 7.1 There are no direct legal implications arising from the recommendations in this report.

Name of lawyer consulted: Siobhan Fry Date consulted (24/08/26):

8. Risk implications

- 8.1 None for this scrutiny report

9. Equalities implications

- 9.1 None for this scrutiny report

10. Sustainability implications

- 10.1 The improvement programme supports the council's sustainability and Net Zero objectives by increasing recycling, reducing waste, improving resource efficiency, and diverting more food waste and recyclable materials from disposal. Measures to reduce contamination and improve resident participation will help maximise the environmental benefits of recycling, reduce carbon emissions associated with waste management, and support the transition to a more circular and sustainable local economy.

11. Health and Wellbeing Implications:

11.1 None for this scrutiny report

12. Conclusion

12.1 Place Overview & Scrutiny Committee is being asked to note the report and provide any comments on the proposed work and how recycling might be further improved.

Supporting Documentation

1. Appendices

1. Presentation slides
2. Cabinet report 16th July 2026

A city to be proud of

*An accessible, clean and
sustainable city*

More recycling less waste.

Scrutiny Committee

8 September 2026

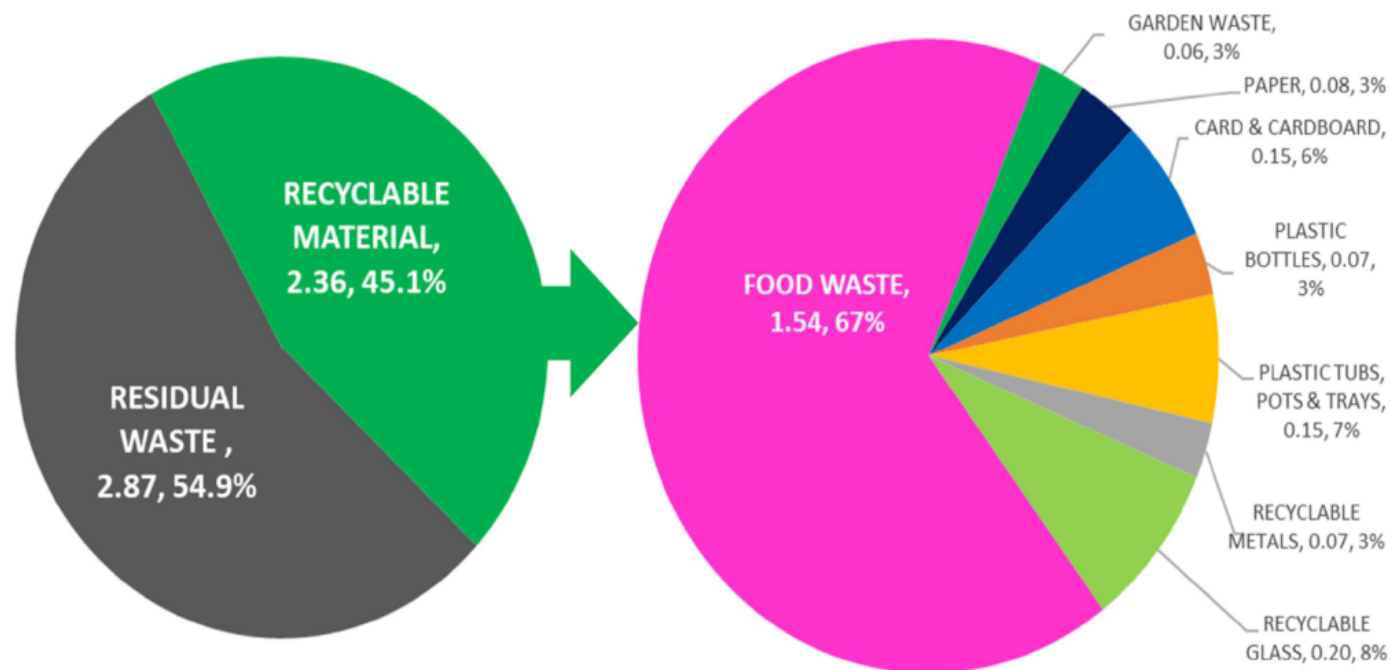


**Brighton & Hove
City Council**

What's in our rubbish bins? (on average)

Figure 17: Average recyclable content of Brighton & Hove residual waste (kg/hh/wk and %)

29.4% Food waste
13.6% Dry mixed recyclable
1.1% Garden waste



2.87kg rubbish 2.36kg recyclable material

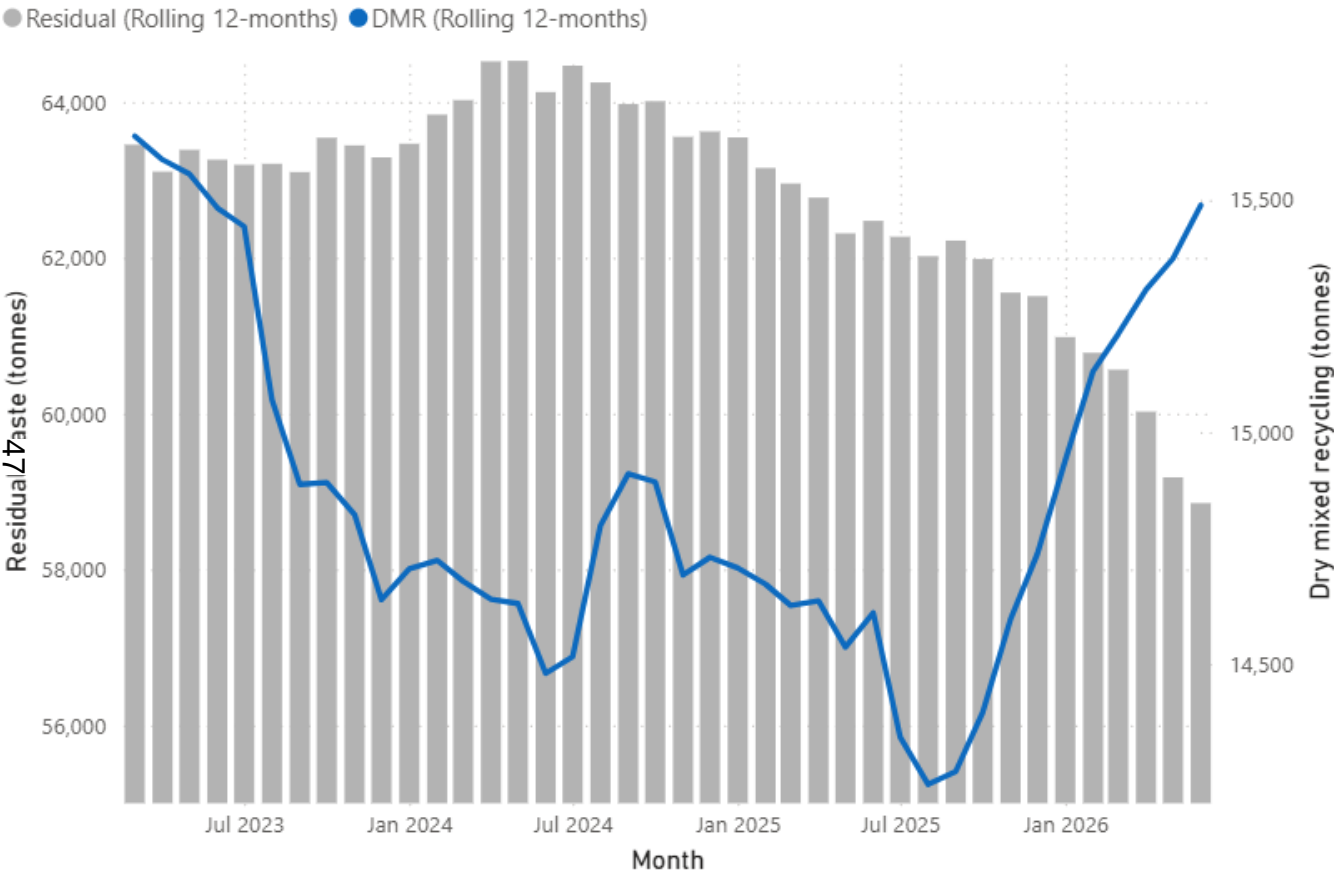
This means:
44.1% of contents of rubbish bins could be still be recycled

Source: Waste Composition Analysis March 2026 Alfred H Knight

What is happening to our waste?

Source: East Sussex CC
from AP21 Waste Data Flow

Residual waste is falling while recycling climbs



Rolling 12-months total. Residual waste (bars) down ~4,600t since 2023; DMR (line) up ~1,250t since mid 2025.

How the waste has changed, year on year

Metric	Jan-Mar 25	Jan-Mar 26	Change
Residual per hh	132.5 kg/hh	123.1 kg/hh	-9.3 kg/hh (-7%)
Recycling rate	24.5%	31.6%	+7.2pp
Dry recycling rate	18.8%	21.2%	+2.3pp
Composting rate	4.7%	9.3%	+4.6pp
Energy recovery rate	75.2%	68.6%	-6.6pp

Same quarter (Jan-Mar) 2025 vs 2026.
pp = percentage points

'Recycle Right': updated communications around recycling



Be innovative
and creative

Expansion of carton
recycling & roll out
of WEEE bins



Making it easier to recycle – new bins for electricals and cartons

More bins have been installed at recycling points across the city, to make it easier to recycle items which cannot be included with household collections.

Cartons
An additional recycling bin with orange lid has been provided for food and drink cartons, milk cartons, etc. These bins are placed in the same area as the other recycling bins.

WEEE bins
A new recycling bin with a black lid and a red top section has been provided for household electricals and appliances. These bins are placed in the same area as the other recycling bins.

Recycling: Keep it clean, dry and loose!

We all want to recycle and putting the right stuff in the right bin is important. The wrong stuff could contaminate the recycling.

No bags or general rubbish in recycling

If you have any bags of rubbish, please take them to your local council's household waste transfer station. Recycling bins are for loose items only.

No drinks – the wrong items can end up in the wrong bin

General waste and black bags of rubbish, plastic pots, tins, paint cans and bags – put these in your waste bin.

Plastic bags and soft plastics – reuse or take to a local shop or bank for recycling.

Food waste and food left on recycling – put in your bin and keep recycling clean.

Cartons and tins – take to a carton bin or a local shop for recycling.

Waste and dog waste – keep and put these in your waste bin.

Christmas & new year recycling & refuse collection dates

Your collection days change over Christmas and new year. Please put your refuse and recycling out by the date below.

Christmas Eve (Thursday 26 December)	Christmas Day (Friday 27 December)	Boxing Day (Saturday 28 December)	New Year's Eve (Thursday 31 December)	New Year's Day (Friday 1 January)	Monday 2 January	Tuesday 3 January	Wednesday 4 January	Thursday 5 January	Friday 6 January	Saturday 7 January	Sunday 8 January
Refuse	Refuse	Refuse	Refuse	Refuse	Refuse	Refuse	Refuse	Refuse	Refuse	Refuse	Refuse
Recycling	Recycling	Recycling	Recycling	Recycling	Recycling	Recycling	Recycling	Recycling	Recycling	Recycling	Recycling

Recycle this Christmas!

Christmas trees
Please cut down your Christmas tree on Monday 18 December and take it to your local council's household waste transfer station.

Shopping paper and cardboard
Please cut down your shopping paper and cardboard on Monday 18 December and take it to your local council's household waste transfer station.

Christmas lights
Please cut down your Christmas lights on Monday 18 December and take them to your local council's household waste transfer station.



Introduction of plastic
pots tubs and trays



Ongoing

Bus stops

2025

Bin Signage &
colour coded lids

F2F engagement



Recycling
points signage
review

Food waste – phased
roll out citywide

Regular Council Housing
'Homing In' articles

Set colour
coding of
recycling
streams
in all
comms



Regular
Brightonian &
Hovarian column



Increased social media

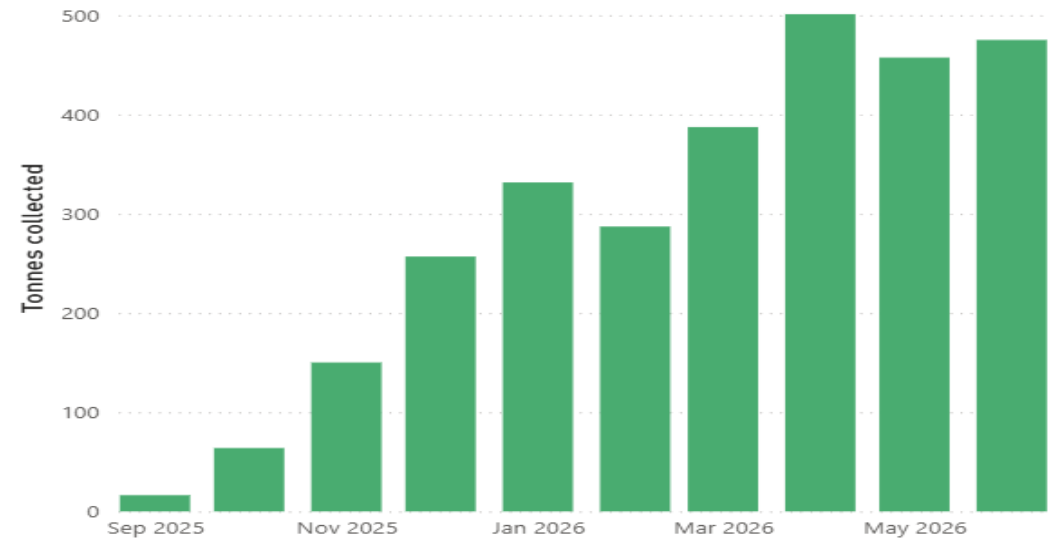


Impact of food waste collections

The 2026 waste composition analysis shows:

- **49% reduction in weight of food waste left in rubbish bins**
- The proportion of food waste in rubbish bins remains high at 29.4% as total household rubbish is 37.4% lower than in 2022
- With food increasingly separated and collected weekly, residual bins are less full, drier, less odorous or at risk of vermin

Food waste is increasing



Monthly tonnage since launch, from 16t in Sept 25 to ~475t by Jun 26

Food waste communications

- Engaging a consultant on food waste rollout led to clear communications, high participation and low levels of contamination on the kerbside.
- Lessons learned informing ongoing recycling communications.
- Flyer regarding recycling of plastic pots, tubs and trays distributed to all households in food waste rollout supported high awareness levels around the

Recycle Right, Recycle More: Cartons and foil

- Citywide communication to all households
- News stories, press releases & social media
- Utilise MyAccount data to push out messaging
- Updated signage for bins in communal areas
- Review of signage at Recycling Points
- Face to face events early 2027 in advance of AWC
- Briefing BHCC colleagues and citywide stakeholders to help disseminate information and support resident understanding
- Working with Community Engagement, Neighbourhood Officers, Council Housing teams
- Encouraging uptake of food waste recycling collections
- Addressing contamination of recycling which remains high.



Survey and engagement

April-May 2026 Behaviour Change Network surveyed residents

- Of the 1,674 respondents:
 - 91.8% knew that plastic pots, tubs and trays can now be recycled.
 - 72.2% are already using the new food waste collection service.
- 2 resident feedback sessions.

Ongoing:

- Further resident sessions to take place across the city to address concerns and support rubbish & recycling e.g. Medisort, food waste, ACs, bin capacity etc.
- Round re-designing - to ensure efficient collections across all waste streams
- Continued frontline staff engagement - for feedback, regular updates and training



Next steps: across Environmental Services

Addressing Contamination

Household rubbish / bagged waste & glass are the largest contaminants at 49.98% and 11.85% respectively

- Develop and implement a robust contamination policy & operational processes – Autumn 2026
- Use in-cab technology data to inform residents via website & directly via email when their recycling is contaminated
- All comms on new materials will address contamination issues - keeping recycling clean, dry & loose (no bags) and glass separate.



Elsewhere in the Service

- Additional capacity in Communal on-street service for recycling
- Partnering with other organisations for additional materials to divert from household rubbish.
Eg: Anglo Doorstep Collections

Service resilience

- Cabinet approval of £1.3m
- Improved collections – controller roles
- Fleet strategy and replacement programme
- Separation of commercial collections



Brighton & Hove City Council

Cabinet

Agenda Item 27

Subject: More recycling less waste

Date of meeting: Thursday, 16 July 2026

Report of: Cabinet Member for Net Zero & Environment

Lead Officer: Corporate Director- City Operations

Contact Officer: Name: Satti Sidhu

Email: Satti.Sidhu@brighton-hove.gov.uk

Ward(s) affected: (All Wards);

Key Decision: Yes

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

For general release

1. Purpose of the report and policy context

- 1.1 The Council Plan 2023 to 2027 and its 2025 refresh set out the priorities to create a city to be proud of, an accessible, clean and sustainable city, and a responsive and learning council with well-run services. This report supports those priorities by seeking to reduce avoidable residual waste, increase recycling and food waste capture, make better use of existing resources and improve the reliability and efficiency of waste collection services.
- 1.2 In January, Cabinet agreed that officers should model options for a future model of delivery for waste collections services that is designed for a reduction in residual waste, and an increase in recycling. The approach approved by cabinet is evidence led and collaborative, with engagement of both residents and staff. This report provides an update on this work and makes recommendations based on the evidence collected and the engagement work undertaken. In addition, this report outlines a series of measures that will ensure the council delivers on the commitment to provide a reliable refuse and recycling service.

2. Recommendations

- 2.1 Cabinet agrees to continue work to model and prepare for the introduction of a fortnightly residential kerbside residual waste collection model, with a view to implementation by July 2027, subject to operational readiness and a final decision being taken by Cabinet.
- 2.2 Cabinet agrees to the investment of £1.3M being made as set out in 3.16 below in order to improve the service in readiness for a change to fortnightly

collections and to achieve the associated savings and efficiencies as detailed in this report.

3. Context and background information

- 3.1 The service has experienced significant historic issues which have resulted in it operating sub-optimally over a sustained period. Over the last two years, considerable progress has already been made to improve performance, including ongoing culture change, the introduction of digital technology, increased recycling opportunities, and the delivery of a new separate food waste collection service, but there continues to be challenges in delivering the quality of service to which we aspire.
- 3.2 The improvements so far have increased the options for recycling, including the acceptance of a wider range of materials. This should result in a significant reduction in residual waste, thereby creating a strong foundation to take forward further change, although the lag on the waste data means we have not yet been able to see the extent to which this has happened. The reliability of collections needs further improvement to ensure the change to fortnightly residual waste collections can be introduced successfully in 2027.
- 3.3 The case for change to a fortnightly residual waste collection service is based on clear local and national evidence. A [study by University of Southampton](#) found that switching to alternate weekly collections increased recycling rates by up to 9% and reduced residual waste volumes significantly. Around 80% of councils already operate fortnightly collections for residual waste. The UK based charity, Waste and Resources Action Programme (WRAP) carried out national analysis which shows that councils with alternate weekly collections achieve recycling rates 5-10 percentage points higher than those with weekly refuse collections.
- 3.4 Since the January Cabinet decision, significant local evidence-gathering and modelling has been undertaken that support the move to alternate weekly residual waste collections, with data from the service showing that many households no longer use the residual waste service weekly, with around 30% already putting out a residual waste bin fortnightly or less frequently.
- 3.5 The analysis from the waste composition survey also shows that 45.1% of kerbside residual waste, equivalent to 2.36 kg per household per week, may be divertible through existing services. Estimates show that food waste is the largest opportunity at 29.4%, with dry recyclables and garden waste accounting for a further 15.7%.
- 3.6 Resident engagement shows that support for a fortnightly residual model depends on reliability, clarity, fairness and confidence in food waste and recycling services. Residents want to recycle more, but need simple guidance, sufficient container capacity, accessible support and assurance that the Council will respond consistently and quickly to missed collections, side waste, contamination, odour, pests, storage constraints and disruption.

- 3.7 A fair and inclusive service provision will be central to implementation proposals and will continue to be discussed through resident engagement. Flats above shops, shared houses, larger households, older and disabled residents, households with medical waste, and areas with limited storage or access may need tailored arrangements. These will be addressed through implementation planning, the Equalities Impact Assessment, service standards and continued engagement.
- 3.8 Staff and trade union engagement will be central to round design, risk management, communications, training and go-live planning. Crews, supervisors, managers and support teams hold essential knowledge on access, traffic, tipping delays, contamination, containers and what works on street. Engagement to date has been constructive and will continue throughout the change process, to ensure the valuable insights and input from staff across the services help shape the final round design.
- 3.9 Ahead of implementation, a clear set of service standards will be published, that will include:
- Alignment of collection days where possible
 - Published service standards to deal with missed collections
 - Proactive communication to residents about any service disruption
 - Regular publication of performance data
- 3.10 Alongside work to review the residual waste collections, modelling of other parts of the collection service will take place to ensure that the service has clear standards across all waste streams.
- 3.11 The Council operates around 1,250 on-street communal bins. The communal refuse service has experienced significant service failures because of the reliability of the side loader vehicles. These vehicles are currently being upgraded to improve the resilience of the communal refuse service, along with a review of the bin capacity across the city. Over the course of the next 3 years, after which the purchase of replacement vehicles will be required, an assessment of the optimal model for communal collections will take place. In the meantime, and as set out below, immediate measures are being put in place to improve the reliability of the service.
- 3.12 A review will also be undertaken on how commercial waste services, including trade waste, garden waste subscriptions and bulky waste collections, are managed alongside residential waste collections. Currently, the commercial service draws from the same pool of resources, including management, vehicles and cover staff, as residential operations. The proposed separation is intended to reduce pressure on residential operations, improve the allocation of crews and vehicles, and strengthen customer service by creating clearer accountability, more responsive service planning and dedicated operational focus for both paying commercial customers and residents receiving statutory household collections.
- 3.13 Investment in Hollingdean Depot is also being planned to ensure the depot is a safe and efficient working environment for staff, and to support the provision

of a high-quality waste service.

3.14 The move to alternate weekly collections, the wider review of all waste streams, the focus on the commercial service and investment in our depot, will bring financial benefits as set out in the financial implications of the report. The collection rounds have not been reviewed for over 20 years, and therefore a review of rounds will ensure much greater efficiency and balanced rounds to ensure most efficient use of resources across the service.

3.15 To ensure the service is resilient and able to sustain excellent performance alongside the implementation of significant changes, further short-term investment is needed. This investment will ensure that the savings associated with a change in the model of service can be realised, and will include:

- Additional waste expertise to address some of the immediate operational issues
- Daily city-wide audits and targeted inspection regimes to ensure service standards are being met
- Additional crews to ensure reliability of collections and speedy resolution of missed bins
- Additional resource to support with cleanliness in communal bin areas and to provide support for any service failures
- A refreshed fleet strategy, that will build on the investment agreed in May 2025, and that will see a programme to replace over time our ageing fleet replaced and to address the historic underinvestment in vehicles
- Additional performance monitoring to provide immediate assurance about the quality of service

3.16 The above will be delivered with the following additional investment

Investment	No of posts	2026/27 £'000	2027/28 £'000	Total £'000	Notes
Management and resources	6	252	92	344	Consultancy, 1 Lead Operations Manager, 4 Operation managers posts and 1 HR Manager. All 6 month resources aside from HR manager which is a permanent resource ask.
Additional Operating staffing capacity	17	415	290	705	Additional operational staffing capacity includes 2 Controllers for 6 months, 3 Workshop Mechanics for evening/weekend cover for 12 months, 2 Caged Van Drivers for 6 months, and additional Operatives/Driver Operatives to support side waste removal, communal recycling point clearance, and communal 4x4 pool collections.

Additional vehicles and contractor capacity	0	233	18	251	Additional vehicle (through hiring agreements) and contractor capacity includes ad hoc contractor support to clear side waste, caged van hire, hire of 2 RCVs and 2 twin packs, and purchase of 40 x 1100L bins to support operational service delivery.
Total	23	900	400	1,300	

4. Analysis and consideration of alternative options

- 4.1 Ongoing work will continue to consider the implementation of a fortnightly kerbside residual residential collection model. This is intended to align residual collection capacity with the reduced waste stream, strengthens use of weekly food waste and recycling services, and creates opportunities to improve route efficiency, resource deployment and resilience. A phased or tailored approach may be used where equalities, storage, access or operational constraints require different arrangements, and as necessary the detail of this will be covered in the subsequent cabinet report.
- 4.2 BHCC's current Materials Recovery Facility (MRF) and collection approach reflect the design of the existing contract and infrastructure. Separate glass collections align with national policy direction under Simpler Recycling and support the production of higher quality recycling outputs. While fully co-mingled collections can offer operational efficiencies, the current system provides a compliant approach that prioritises material quality and environmental outcomes within the constraints of the existing facility.
- 4.3 A full range of options for the next contract will be explored as part of the scoping exercise to inform the development of the contract specification and subsequent tender process. This stage will provide the Council with the opportunity to review all potential delivery models and future requirements, including consideration of any associated infrastructure needs.
- 4.4 Dependent upon the option ultimately pursued, there is scope to make effective use of existing assets to support future service delivery. This would enable the Council to retain operational efficiency while adapting to evolving requirements, ensuring that current infrastructure continues to provide value within any future arrangement.

5. Community engagement and consultation

- 5.1 Consultation and engagement have identified the practical conditions for any change to collection frequency: reliability, clear information, sufficient container capacity, weekly food waste, fair treatment of different household circumstances and consistent handling of missed or disrupted collections.
- 5.2 Engagement will continue before implementation and focus on the delivery model, including container capacity, assisted collections, households with

medical or additional waste needs, communal and complex properties, side waste, contamination, service guarantees and accessible communications. Resident feedback will be used alongside operational modelling, waste composition evidence, equalities assessment and staff insight to shape the final implementation plan.

- 5.3 Staff consultation and engagement will continue throughout the change process to ensure that our staff are fully involved and support the shaping of the future service with their valuable knowledge and expertise of waste collections.

6. Financial implications

- 6.1 Part of the budget proposals for 2026/27 included a saving of £0.375m from implementing service efficiencies, improving productivity through a review of the waste collection model and design of collection rounds. The delivery of this saving is contingent on the implementation of plans outlined in the report. As part of the month 2 finance report this has been allocated as a grey saving, i.e. a saving without a defined plan therefore at risk of not being delivered. Any decision to not implement or delay will directly impact on the saving being made in 26/27 and is therefore accounted for as a pressure within the month 2 Environmental Services forecast outturn.
- 6.2 The report sets out the route to potentially implementing Alternate Weekly Collections, the anticipated costs of delivering this was £0.5m at the start of the financial year, subsequently revised to £0.4m at month 2. The funding of these costs was to be met from a carry forward of budget from 2025/26. However, this was not approved due to ensuring the council's financial position was managed down as far as possible, by utilising all available resources. The result means those project delivery costs are required to be met from within the 2026/27 Environmental Services budgets making the financial position for the council worse in 2026/27.
- 6.3 The proposals set out in this report require an estimated gross investment of approximately £1.3m, split £0.9m and £0.4m in 26/27 and 27/28 respectively to stabilise and improve the waste collection service. This reflects temporary operational measures, including additional staffing, fleet capacity through the hire of additional vehicles, and support services resources.
- 6.4 A key component of this investment relates to fleet provision. The current service already utilises a number of hired vehicles which are assumed within the existing revenue budget and forecast. The proposal therefore relates only to the incremental cost of two additional vehicles, with an estimated annual revenue impact of approximately £0.170m. The existing seven vehicles are already reflected within the current budget forecast at month 2.
- 6.5 At the latest Targeted Budget Management (TBM) position, City Operations is forecasting a net underspend of £0.241m. However, this position remains subject to a high level of volatility, particularly in relation to income assumptions. The additional investment proposed needs to be managed

outside of that underspend so as not to adversely impact on the councils forecast position at month 2.

- 6.6 At this stage, no specific offsetting savings have been identified to fully mitigate this pressure. The investment proposed is additional over and above the current forecast position and so adversely impacts the financial position of the council. If approved and mitigations or additional income are found to offset this pressure, it will directly divert resources that would have otherwise supported the council's financial position as reported at month 2.
- 6.8 The financial risk associated with these proposals has been reflected within the corporate financial risk position reported through TBM, but not part of the forecast.
- 6.9 Whilst the proposals increase in-year financial pressure, they are expected to contribute to improved operational performance and enable the transition to a more sustainable and efficient service model over the medium term, including planned changes to collection arrangements. This will enable the service to deliver the alternate weekly collection model, which is estimated to deliver approximately £0.5m in savings with £0.375m expected in 2027/28, the remaining the year after. The payback for this investment based on the full £0.5m savings expected is within 3years.

Name of finance officer consulted: Craig Garoghan Date consulted: 29/06/2026

7. Legal implications

- 7.1 Under section 45 of the Environmental Protection Act 1990 the Council as a waste collection authority is required to collect household waste. Guidance issued by DEFRA confirms that waste collection authorities are required to decide on the collection frequency and methodology for collecting the residual (non-recyclable waste) and dry recyclable waste and to do so in a way that meets local needs and provides value for money for the taxpayer. In planning and delivering waste collection services from households, the Council is required to ensure that:
- all households have reasonable residual and recyclable waste collections
 - they consider providing additional services for specific needs, such as households with medical needs
 - there is no build-up of odorous waste at the kerbside
 - changes to collections do not lead to an increase in fly-tipping of residual waste

The proposals set out in this report are in keeping with the Council's duties as a waste collection authority.

Name of lawyer consulted: Siobhan Fry Date consulted (03/07/26)

8. Risk implications

- 8.1 Risk will be managed through the programme governance process, and led by the Director, Environment & Leisure. The key implementation risks are: public confidence, equalities impacts, operational readiness, workforce engagement, container capacity, communications accuracy, service disruption, and the potential for side waste or fly-tipping if the model is not supported by clear standards and enforcement arrangements.

9. Equalities implications

- 9.1 The final decision will be accompanied by a full impact assessment.

10. Sustainability implications

- 10.1 The proposal supports net zero objectives through a sustained increase in recycling.

11. Health and Wellbeing Implications:

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

12. Conclusion

- 12.1 The ongoing work outlined in this report is supported by a strong and local evidence base. The 2026 Waste Composition Analysis shows that kerbside residual waste has reduced substantially and that 45.1% of what remains could already be diverted through existing services. Food waste remains the largest single component of the residual bin despite the availability of weekly food waste collections, and packaging remains a significant part of the residual stream. Operational modelling shows that the current weekly residual model is increasingly misaligned with changing waste flows and can be redesigned to improve productivity, resilience and performance. Consultation and engagement show that residents need clarity, capacity, reliability and guarantees, while staff engagement will be essential to designing a model that works in practice. On that basis, the recommended next step is continue the work to remodel the service, working towards a more reliable service, and on the basis of future cabinet decision, a fortnightly residual waste collection service.

Brighton & Hove City Council

Place Overview & Scrutiny Committee

Agenda Item 23

Subject: Memorials Policy

Date of meeting: 8th September 2026

Report of: Chair of Place Overview & Scrutiny Committee

Contact Officer: Name: Natalie Sacks-Hammond

Email: Natalie.sacks-hammond@brighton-hove.gov.uk

Ward(s) affected: (All Wards);

Key Decision: No

For general release

1. Purpose of the report and policy context

- 1.1 This report appends an updated draft Memorials Policy, which aims to ensure clarity for officers and the public regarding memorials in the public domain. This includes plaques, public art, benches, trees, gardens, temporary and historic memorials such as statues. This policy does not apply to property or land under private ownership.
- 1.2 The policy clarifies the types of memorials which may be allowed and the criteria applied by the Council when considering whether to grant approval, as well as guidance on the formal application process which must be followed. It also clarifies the legal requirements, including in relation to planning permissions required as well as on byelaws relating to memorials and structures on council land. Appendix 1 contains presentation slides; the draft policy can be accessed at Appendix 2.
- 1.3 A draft Memorials Policy was originally presented to Place Overview & Scrutiny Committee on 24th March 2026. Following feedback, the Policy has been further revised and is now returning to this Committee prior to being put to Cabinet for formal approval.

2. Recommendations

- 2.1 That Place Overview & Scrutiny Committee note the report.

3. Context and background information

- 3.1 The Memorials Policy has been developed for those who wish to install a memorial in the city. It follows the core principles of Compassion, Inclusivity and Diversity, and High Quality, Sustainable and Contemporary Design. It

has been reviewed by City Parks, Culture & Events, Environmental Services and Highways. The Planning and Licensing Teams have been consulted.

- 3.2 The Policy has been revised in response to feedback from members of Place Overview & Scrutiny Committee at its meeting on 24th March 2026. Key changes include:

- Extension of timeframe for removal from 14 days to 28 days
- Clarification of permission and removal process making it clear that spontaneous displays do not require permission unless they go over the 28-day limit
- Better signposting of memorial options within the cemeteries estate
- Integration of existing roadside memorial policy (circa 2015)
- “Historically significant” exception for the 20-year rule (for example, Covid memorial)

- 3.3 The application process will normally take 8 weeks from the initial application once all relevant documents and permissions have been obtained. For temporary flower displays, officers will seek to contact the bereaved within 28 days. For a more permanent memorial, consultees will be agreed with Community Cohesion colleagues.

- 3.4 After 28 days, temporary memorials will be removed by City Parks or Environmental Services if on the Highway. Longer Term applicants will be advised to contact the Planning Department. Applications will be assessed on historical and cultural significance, impact on the landscape, accessibility, safety, environmental factors and saturation of existing memorials in the area. For commemorative memorials, there will be a 20-year wait to ensure future historical relevance unless exempt. There will be a 28-day appeals process if the application is not granted.

4. Analysis and consideration of alternative options

- 4.1 No alternative options have been identified

5. Community engagement and consultation

- 5.1 The policy has been revised with reference to a variety of council teams including City Parks, Culture & Events, Environmental Services and Highways and checked with the Planning and Licensing Teams. Applicants must consult prior to their application to demonstrate support from the community. The Community Cohesion Team can help with this.

6. Financial implications

- 6.1 There are no direct financial implications arising from the recommendation for this report.
- 6.2 The Policy sets out the Council’s approach to approving and managing memorials on Council-owned land and clarifies that all costs associated with installation, repair and ongoing maintenance are to be fully funded by

applicants. As such, the Policy is not expected to create additional revenue pressures for Council services.

- 6.3 Any clearance of temporary memorials following the permitted 28 day period will be managed within existing City Parks and Highways budgets. Any advisory input required from Planning or other services will be met from existing staff resources.
- 6.4 Should future service improvements be pursued, such as automation of the application process these would need to be considered within existing digital and service-improvement programmes, subject to available resources.

Name of finance officer consulted: John Lack Date consulted: 19/08/2026

7. Legal implications

- 7.1 No legal implications other than those noted have been identified.

Name of lawyer consulted: Victoria Simpson Date consulted 17.08.26

8. Risk implications

- 8.1 Not specifically for this report

9. Equalities implications

- 9.1 Inclusivity and diversity are core principles of this Policy, which encourages memorials that recognise historically underrepresented groups and celebrates the variety of contributions that have shaped the city.

10. Sustainability implications

- 10.1 Sustainability is a core principle for this policy and memorials are expected to be sustainable to maintain, constructed from durable materials that are coastally resilient and sympathetic to the local area.

11. Health and Wellbeing Implications:

- 11.1 Health and safety is considered throughout the policy ensuring that all installations are accessible and safe.

12. Conclusion

- 12.1 Place Overview & Scrutiny Committee note the report.

Supporting Documentation

Appendices

1. Presentation on the Memorial Policy
2. Draft Memorial Policy

Memorials Policy

Balancing respect and public amenity



Brighton & Hove
City Council

Memorials Policy

Purpose:

To ensure clarity for officers and the public in managing memorials in the public domain

What's Covered:

Plaques, public art, benches, trees, gardens, temporary and historic memorials (e.g. statues)

Key Principles:

- Compassion, inclusivity, and diversity
- High quality, sustainable, and contemporary design



Be healthy and
psychologically safe



Memorials Policy -Process



Be connected

“One Council” approach:

- Drafted between City Parks, Culture & Events, Environmental Services and Highways
- Checked with Planning and Licensing
- Designed to ensure future maintenance

Scrutiny and Review:

- Policy has been through the corporate meeting schedules before a first review at Scrutiny
- The policy has been revised and is now returning to scrutiny before Cabinet adoption



Memorials Policy – Key Changes

- Extension of timeframe for removal from 14 days to 28 days
- Clarification of permission and removal process
I.e. spontaneous displays not requiring approval unless going over the 28-day limit
- Better signposting of memorial options within the cemeteries estate
- Integration of existing roadside memorial policy (Circa 2015)
- “Historically significant” exception for 20-year rule (E.g. COVID memorial). Clear R&R with senior leadership



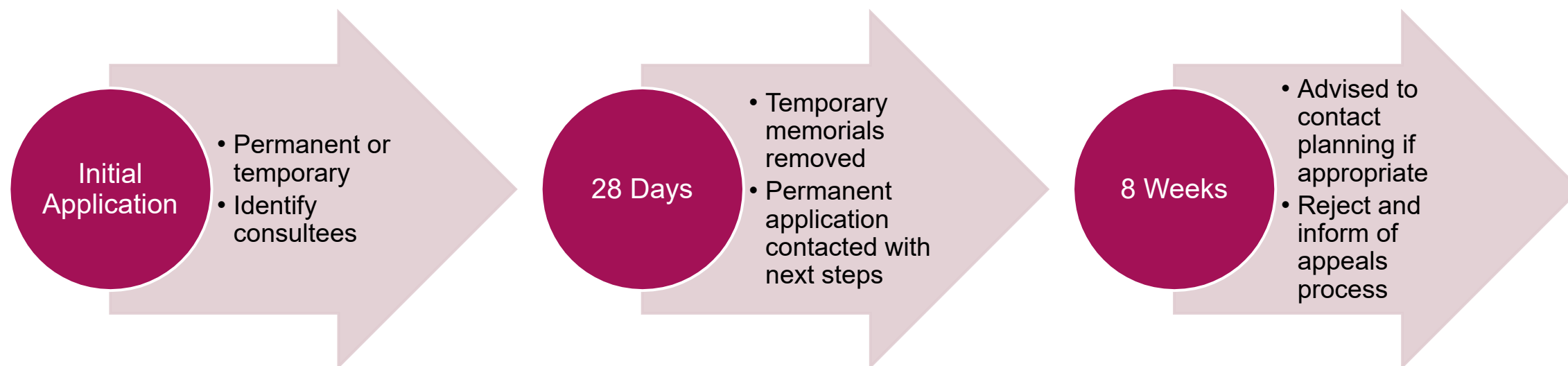
Be diverse
and inclusive



Application Process



Be confident



For temporary flower displays, officers will seek to contact the bereaved within 28 days

For a more permanent memorial consultees will be agreed with community cohesion colleagues

Removals to be carried out by city parks, or if on the highway, environmental services.

Longer term applicants referred to policy and advised to contact planning. 20-year rule check carried out.

Initial agreement granted if suitable pending consultee opinions.

28-day appeal process to Flagged to applicant if not granted



**Brighton & Hove
City Council**

Thank you for listening

Any Questions?

BRIGHTON & HOVE

Memorials and Public Art Memorials Policy

Revised draft for scrutiny

Place Overview & Scrutiny Committee | 8 September 2026

Purpose of this revision

This draft incorporates the changes identified following internal review, the March scrutiny discussion and subsequent member feedback. It extends the temporary tribute period to 28 days, clarifies the permission and removal process, integrates roadside memorial arrangements, strengthens signposting and sets out governance for exceptional and politically sensitive decisions.

Document status	Draft for scrutiny
Policy owner	Brighton & Hove City Council
Committee date	8 September 2026
Review cycle	Every three years, or earlier where legislation or operational learning requires

1. Introduction

This policy provides a clear and compassionate framework for anyone considering a memorial or public art memorial in Brighton & Hove. It explains the types of proposal the council wishes to support, the standards expected, the application and decision process, and the circumstances in which temporary tributes may be managed or removed.

The council recognises that memorials have deep personal and community significance. They can help people remember individuals, commemorate important events, celebrate the city's diverse cultural heritage and enhance the public realm. Decisions will balance these purposes with public safety, accessibility, community cohesion, environmental protection, maintenance and the fair use of public space.

2. Scope and purpose

This policy applies to public spaces and publicly accessible buildings under the council's ownership, management or control. It does not apply to privately owned land, although separate planning or licensing requirements may apply to proposals on private land.

- Memorials and commemorative plaques
- Public art installations created for memorial purposes
- Donation benches and commemorative trees
- Commemorative gardens
- Temporary and spontaneous memorial tributes
- Roadside memorials and collision-site tributes
- Historic statues and other permanent memorials in the public realm

Important distinction

This policy governs the creation, approval, management and maintenance of memorials. A proposal to remove, relocate or materially reinterpret an existing permanent memorial because it has become contested is not a routine officer decision and must be escalated through the council's political and legal governance arrangements.

3. Core principles

Compassionate consideration

Requests and spontaneous acts of remembrance will be handled sensitively and respectfully, recognising that they often arise during periods of grief and distress.

Inclusivity and diversity

The council welcomes proposals that reflect the city's diverse cultural heritage and experiences, including recognition of historically underrepresented communities.

Quality and sustainability

Permanent installations must be of high quality, appropriate to their setting, durable in a coastal environment and supported by realistic arrangements for maintenance, repair and eventual removal where necessary.

Accessibility, safety and shared use

Memorials must not create unacceptable risks, obstruct access, prevent the ordinary use of public space or adversely affect the rights and needs of other users.

Proportionate and accountable decisions

Operational decisions will be made by the relevant service. Exceptional, controversial or strategically significant matters will be escalated to an appropriately accountable decision-maker.

4. Permanent memorials and public art memorials

4.1 Early discussion

Applicants should contact the council at an early stage. The lead service will depend on the proposed location and type of memorial. Officers will identify land ownership, relevant permissions, likely planning or highway requirements, consultation expectations and maintenance obligations.

4.2 Application requirements

- A detailed proposal describing the purpose, design, dimensions, materials and proposed location
- Evidence of funding for design, installation, maintenance, repair and, where appropriate, future removal
- A maintenance plan identifying the responsible person or organisation
- Evidence of appropriate community and stakeholder support
- Permission from relevant stakeholders, including next of kin where appropriate
- An accessibility, public safety and environmental assessment proportionate to the proposal
- Any planning, landlord, highway, heritage, licensing or other consent required

Consultation requirement

The council will determine the appropriate scope and method of consultation for each permanent memorial proposal, having regard to its location, scale, significance and likely community interest. Consultation arrangements will not be determined solely by the applicant.

4.3 Assessment criteria

- Historical, cultural or civic significance
- Suitability and significance of the proposed location
- Impact on the landscape, streetscape, heritage assets and existing uses
- Accessibility, equality, public safety and community cohesion
- Environmental impact and coastal resilience
- The number and concentration of existing memorials in the area
- Quality and contemporary relevance of the design
- Whole-life maintenance, repair, insurance and removal arrangements
- Compliance with planning policy and other legal or regulatory requirements

4.4 The twenty-year principle

For a new permanent memorial commemorating an individual or event, the council will normally observe a 20-year waiting period. This allows time for historical perspective and supports consistent decision-making.

Earlier consideration may be appropriate where an event is of exceptional or historically significant importance to the city, for example a major civic or public-health event. Any request for an exception must include evidence of significance, community support, location suitability and long-term funding.

Governance point for final confirmation

An exception to the twenty-year principle, or an appeal relating specifically to that principle, will require a politically accountable executive decision. The precise route must be confirmed in the covering committee report and final version of the policy following legal and governance advice.

4.5 Decisions and appeals

Decisions will be communicated in writing with reasons. Where an application is declined, the council will identify any suitable alternative options and explain the applicable review or appeal route. Appeals should be submitted within 28 days of the decision. The route will reflect the legal status and significance of the decision; exceptional applications engaging the twenty-year principle will follow the governance route described above.

5. Temporary and spontaneous memorial tributes**5.1 No prior approval for a spontaneous tribute**

A small, peaceful and spontaneous display of flowers or similar temporary tributes on council land does not require advance permission where it can be accommodated safely and is intended to remain for no longer than 28 days. This avoids placing an unnecessary administrative burden on people who may be grieving.

5.2 The 28-day period

Flowers and other suitable temporary tributes will normally be accepted for up to 28 days. The relevant service may remove items earlier where the display reaches capacity, creates a health and safety risk, obstructs access, damages council property or the environment, or causes another significant operational concern. Wherever practicable, items will be removed sensitively and recyclable material will be recycled.

5.3 Items requiring permission

Prior permission is required for any structure, installation or organised display, including tables, gazebos, barriers, lighting, amplified equipment, large containers, fixed signage, items attached to trees or street furniture, or any display intended to remain beyond 28 days. Events and larger gatherings may also require event, licensing, planning, highway or police liaison.

5.4 Immediate removal

The council may remove an item immediately where it:

- creates an immediate risk to public safety
- blocks a pavement, cycle lane, highway, entrance, emergency route or accessible route
- prevents the ordinary use of a bench or other public facility
- is fixed to a tree, statue, railing, lamppost or other asset without permission and creates risk or damage
- constitutes an unauthorised structure or substantial installation
- is unlawful, or its retention would expose the council to an immediate legal or operational risk

Where a display has potential public-order, protest, major-incident or community-cohesion implications, the responsible service will seek advice from appropriate council teams and external agencies before action is taken, unless an immediate safety response is required.

6. Roadside memorials and highway locations

Roadside and collision-site tributes are included within this policy. The council will recognise their sensitivity while ensuring that the highway remains safe and accessible.

- Flowers or suitable temporary tributes may remain for up to 28 days, subject to safety, access and capacity considerations.
- Items must not obstruct visibility, footways, crossings, cycle lanes, carriageways, signs, signals, railings or maintenance access.
- Nothing may be fixed to highway infrastructure without permission.
- The Highway Authority will determine whether a roadside display creates an unacceptable highway risk and whether a licence or other consent is required.
- Where practicable, sensitive communication will take place before removal, but immediate action may be taken where safety requires it.

7. Statues, historic memorials and contested heritage

Applications for new statues and permanent public art memorials will be assessed under this policy alongside relevant planning, public art and heritage guidance. Contemporary and non-figurative approaches to commemoration should be considered where they offer a stronger response to place, community and context.

Routine maintenance of an existing memorial remains an operational matter. A campaign or request to remove, relocate or materially reinterpret an existing permanent memorial because it is contested must be referred through political channels and be subject to legal, heritage, planning and public-law advice as appropriate. Officers must not treat such a request as routine maintenance or an ordinary temporary-memorial removal.

8. Donation benches, trees and cemetery alternatives

8.1 Benches

- The donation scheme applies to new benches at locations offered or agreed by the council.
- An approved plaque may be included on a new donated bench. New plaques will not be added to existing benches unless an expressly approved scheme provides otherwise.
- The design, location, wording, highway implications and maintenance costs must be agreed before approval.
- Benches must remain available for public use. Items that prevent their use may be removed immediately.

8.2 Trees and planting

- Tree donations are via the Tree Trust Fund. Applicants can apply for the full cost of planting a tree or an amount of your choosing towards the city's tree planting programme.
- Tree donations must use council-approved species, sites and suppliers to protect biosecurity and the wider environment.
- Application window until 30th of September, planting takes place between November – March.
- If a request is received after 30th September, the request will be logged for the following planting season.
- Trees proposed on the highway require site assessment, including consideration of underground equipment and whole-life maintenance.
- Memorial plaques and the scattering of ashes are not permitted around donation planting in parks and open spaces.

- Plant donations and informal memorial planting are not accepted in parks and open spaces.

8.3 Cemetery memorial options

Where a proposal is not suitable for a park, highway or other public-realm location, officers should signpost applicants to memorial options available through the city's cemeteries and Bereavement Services.

Cemetery memorial options: <https://www.brighton-hove.gov.uk/woodvale-crematorium-and-cemeteries/memorials>

9. Permissions and legal framework

Landowner consent must always be obtained for a permanent memorial or structure. Depending on the proposal and location, planning permission, advertisement consent, listed-building or conservation-area considerations, a highway licence, an event permission or another statutory consent may also be required.

The relevant council byelaws prohibit unauthorised structures in pleasure grounds. Temporary use and planning rules do not remove the need for landowner consent, event permission, highway approval or compliance with safety requirements.

Public Art Strategy 2022 to 2032: <https://www.brighton-hove.gov.uk/libraries-leisure-and-arts/arts-and-culture/public-art-strategy-2022-2032>

Public Art Planning Advice Note PAN10: <https://www.brighton-hove.gov.uk/planning/planning-policy/public-art-planning-advice-note-pan10>

Public Art Commissioning Toolkit: <https://www.brighton-hove.gov.uk/libraries-leisure-and-arts/arts-and-culture/public-art-commissioning-toolkit>

Events and filming: <https://www.brighton-hove.gov.uk/libraries-leisure-and-arts/events-and-filming>

Pre-application planning advice: <https://www.brighton-hove.gov.uk/planning/planning-applications/pre-application-planning-advice-service>

10. Roles, responsibilities and escalation

Issue	Lead response	Escalation
Parks or open-space tribute	Relevant land-management service	Community Safety, Communications, Emergency Planning or political leadership where wider implications arise
Roadside or highway tribute	Highway Authority	Emergency services or political leadership where required
Permanent memorial application	Lead landowner service with Planning, Highways, Culture and other advice as required	Appropriate decision-maker under the council's governance arrangements
Twenty-year exception	Officer assessment and recommendation	Politically accountable executive route, subject to final legal confirmation
Removal of an existing	No routine officer determination	Political, legal, heritage and planning

Issue	Lead response	Escalation
contested memorial		governance route

11. Operational decision framework

1. Identify the landowner and responsible service.
2. Determine whether the tribute is spontaneous and temporary, or an organised, structural or permanent proposal.
3. For a spontaneous tribute, confirm whether it can remain safely for up to 28 days.
4. Identify any immediate safety, accessibility, environmental, asset-damage or legal issue.
5. Check whether the matter has public-order, protest, major-incident, community-cohesion or significant communications implications.
6. Where required, liaise with relevant council services and external agencies.
7. Record the decision, responsibilities, planned review date and approach to sensitive communication.
8. Escalate exceptions, contested permanent memorials and other politically significant matters through the appropriate governance route.

12. Maintenance and long-term care

Every permanent memorial application must identify a responsible person or body and provide funded arrangements for regular maintenance, cleaning, repair, insurance where applicable, and eventual relocation or removal. Where obligations are not met, the council may issue notice requiring remedial action and may take further action in accordance with the relevant agreement and legal powers.

13. Support and contact

Council officers can provide pre-application advice, help identify relevant services and suitable locations, explain permissions, and signpost applicants to appropriate arts, parks, highways, planning or Bereavement Services contacts.

City Parks: cityparks@brighton-hove.gov.uk

Culture and Creative Industries: Arts@brighton-hove.gov.uk

Planning applications: planning.applications@brighton-hove.gov.uk

14. Review

This policy will be reviewed every three years, or earlier where legislation, council governance, significant incidents or operational learning indicate that a review is required.

Appendix A: Summary of revised provisions

- Temporary tribute period extended from 14 to 28 days
- No advance permission required for a suitable spontaneous tribute lasting no more than 28 days
- Clear distinction between temporary tributes, permission-required installations and immediate-removal circumstances
- Roadside memorial arrangements incorporated
- Cemetery memorial options more clearly signposted
- Historically significant event exception added to the twenty-year principle
- Political accountability required for exceptions and requests concerning removal of an existing contested memorial

- Council-determined consultation scope added for permanent applications
- Benches, plaques, trees and donation arrangements clarified
- Operational roles and escalation framework included