

Cabinet

Date: **16 July 2026**

Time: **10.30am**

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

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

Contact: **Anthony Soyinka**
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Chief Executive
Hove Town Hall
Norton Road
Hove BN3 3BQ

Date of Publication - Wednesday, 8 July 2026

AGENDA

Part One

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19 PROCEDURAL BUSINESS

- (a) **Declarations of Interest:** Statements by all Members present of any personal interests in matters on the agenda, outlining the nature of any interest and whether the Members regard the interest as prejudicial under the terms of the Code of Conduct.
- (b) **Exclusion of Press and Public:** To consider whether, in view of the nature of the business to be transacted or the nature of the proceedings, the press and public should be excluded from the meeting when any of the following items are under consideration.

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

A list and description of the exempt categories is available for public inspection at Brighton and Hove Town Halls and online in the Constitution at Part 3E

20 MINUTES

To consider the minutes of the previous meeting.

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22 CALL OVER

23 PUBLIC INVOLVEMENT

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

- (a) **Petitions:**
To receive any petitions presented by members of the public.
- (b) **Written Questions:**
To receive any questions submitted by the due date of 12 noon on 10 July 2026.
- (c) **Deputations:**
To receive any deputations submitted by the due date of 10am on the 6 July 2026.

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To consider any written questions

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Ward Affected: All Wards

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Contact Officer: Jasmine Dean-Milward
Ward Affected: Rottingdean & West Saltdean

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

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- Do not re-enter the building until told that it is safe to do so

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

Cabinet

Agenda Item 28

Subject: Hove Park School –Proposal to consolidate onto a single Site at the Nevill Campus and Disposal of the Valley Campus

Date of meeting: 16 July 2026

Report of: Cabinet Member for Finance and City Regeneration

Lead Officer: Corporate Director for Families, Children and Wellbeing

Contact Officer: Richard Barker

Email: Richard.Barker@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).

1. Purpose of the report and policy context

- 1.1 This report seeks Cabinet approval to consolidate Hove Park School onto a single site at the Nevill Campus from September 2028, and to release the Valley Campus for disposal. The report follows the conclusion of the public consultation and the statutory representation period and sets out the consultation responses received, the proposed approach to disposal of the Valley Campus, and the financial, legal and equalities implications of the proposal.
- 1.2 Hove Park School is a community secondary school maintained by Brighton & Hove City Council, currently operating across two sites approximately one mile apart: the Nevill Campus (Nevill Road) and the Valley Campus (Valley Drive). The proposal forms part of the Council's wider School Sustainability Strategy, which seeks to make best use of the city's school estate, address surplus capacity, and place schools on a financially and educationally sustainable footing.
- 1.3 The proposal has been developed in partnership with the school's Governing Board and Headteacher, with the educational case set out in the school's own consultation submission and supported by Council officers throughout the statutory school organisation process. A decision to proceed would be determined on the basis that the school's financial position can demonstrably improve in future years.
- 1.4 The proposal aligns with and contributes to the Council Plan 2023–2027 (refreshed 2025), which sets out the Council's vision for a better Brighton &

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Hove for all. In particular, it supports the Council Plan's Outcome 2 — *A fair and inclusive city* — which includes a commitment to deliver accessible, affordable and high-quality homes for all residents of Brighton & Hove, addressing the acute shortage of housing in the city.

- 1.5 Disposing of the Valley Campus will generate a capital receipt to support the Council's financial sustainability and investment in priority services. This is consistent with the Council Plan's recognition that the Council must make best use of its assets to help address the £95 million budget gap for 2026–2030. The proposal also supports Outcome 1 — *A city to be proud of* — by consolidating the school estate on a more educationally and financially sustainable basis, while enabling the Valley Campus to contribute to the Council's wider placemaking ambitions for the city

2. Recommendations

- 2.1 Cabinet agrees to approve the consolidation of Hove Park School onto a single site at the Nevill Campus with effect from September 2028, subject to the completion of the necessary capital works.
- 2.2 Cabinet agrees to delegate authority to the Director Property and Finance, to:
 - commission the Phase 1 and Phase 2 capital works at the Nevill Campus within the funding envelope
- 2.3 Cabinet notes that the Section 77 application in respect of the Phase 2 Internal remodelling and 3G artificial pitch will be submitted to the Secretary of State, and that final approval of Phase 2 will be confirmed on receipt of consent.

3. Context and background information

- 3.1 Hove Park School is an 11-18 community secondary school. The school has operated across the Valley and Nevill sites for many years. Operating on two sites at approximately one mile distance carries an additional cost to the school's budget.
- 3.2 Pupil numbers at Hove Park have declined in line with the wider fall in secondary-age pupils across the city, and the school has been operating with a licensed deficit. The school's Governing Board, working with the Local Authority, has concluded that consolidation onto a single site is the most sustainable long-term option for the school, both educationally and financially.
- 3.3 A first phase of public consultation took place in Spring 2025 and received 169 responses. Feedback from this consultation made clear that respondents wanted to see detailed plans before any decision was taken.
- 3.4 A second public consultation ran from 13 April to 25 May 2026, accompanied by site plans, 3D visualisations, costings and a description of the educational model on a single site. Three public meetings were held

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(one in person at the Valley Campus on 23 April, one in person at the Nevill Campus on 27 April, and one online on 6 May 2026) alongside the Your Voice online portal. The outcomes of that consultation are summarised at Section 4 of this report.

- 3.5 Following consideration of the responses to the consultation, the Corporate Director, Families, Children & Wellbeing, in consultation with the Lead Member agreed to publish a Statutory Notice to progress the proposal. This was followed by a four week representation period between 8 June 2026 and 6 July 2026. Notices were displayed at school entrances and gates, on both school websites, Council website, Your Voice portal and in local media. Copies of the full proposal were sent to the Governing Boards of both schools, the Anglican and Catholic dioceses, local ward members, the Member of Parliament for Brighton Pavillion and the Department for Education (DfE). Copies of the complete proposal have been made available to anyone who requested a copy during the publication period.
- 3.6 A total of 109 responses were received via the Your Voice portal, representing a completion rate of 96.5% of those that reviewed it. Two email submissions were also received. Respondents on the Your Voice Portal were asked directly whether they supported the school's proposal to move from two sites to one at the Nevill Campus. Of those, 108 answered this question. The breakdown of responses to that question is set out below:

Response	Numbers	%
No – do not support	68	63%
Yes – support	31	29%
Not sure	9	8%

- 3.7 The themes raised were broadly consistent with those raised in the first round of consultation, with several new and more detailed concerns emerging as a direct result of the more developed plans now being available. The most frequently raised matters are below:

Location and impact of the proposed 3G artificial pitch: particular concerns are around the proximity of the indicative position to residential properties along Old Shoreham Road and Nevill Road. Concerns focused on noise, floodlighting, light spillage into neighbouring homes, safeguarding and a loss of green space. A number of respondents expressed support in principle for a 3G pitch but objected to the position shown on the indicative plans, with several preferring the alternative position towards the south-east of the site, adjacent to the allotments. Out-of-hours and community use of the pitch were raised and the effect of this on neighbouring properties.

Traffic, road safety and parking around the Nevill Campus: parking around Nevill Avenue and the Old Shoreham Road entrance were highlighted, with respondents raising concerns about congestion at drop-off and pick-up, pedestrian and cycle safety, overspill parking on residential streets and the cumulative effect of nearby housing developments.

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SEND provision and pastoral support: respondents valued the current model for the way it supports the transition of younger pupils from primary school and questioned whether the benefits of consolidation outweighed the loss of this feature.

The future of the Valley Campus: there were repeated comments around what would happen to the site and a strong preference among many respondents to consider retaining land for public benefit, including continued use of the cricket pitches.

- 3.8 Supporters of the proposal cited the long-term financial sustainability of the school, the educational and operational benefits of staff and resources being on a single site and the reduction in transitions and movement for pupils between the two campuses.

Statutory Notice Representations

- 3.9 In accordance with the Education and Inspections Act 2006 and the School Organisation (Prescribed Alterations to Maintained Schools)(England) Regulations 2013, a statutory notice was published on 8 June 2026, opening a four week representation period which closed on 6 July 2026.
- 3.10 17 formal representations were received during the representation period. A summary of the representations is provided at Appendix 5.
- 3.11 The matters raised in representations did not introduce new material issues beyond those raised during the second statutory consultation. The Council's view is that the representations have been considered in full and addressed in the body of this report, and no new evidence has emerged which would alter the proposal as published.

Disposal of the Valley Campus

- 3.12 To inform the future disposal strategy for the whole site, we have instructed architects to develop a detailed massing study. This considers the envelope, density, and potential unit mix on the site, aligning to planning parameters/policy. Following the completion of this stage, we will be instructing detailed valuation advice to inform the preferred option.
- 3.13 Cabinet notes that any future disposal is subject to Secretary of State approval under a Section 77 application. Subject to Cabinet decision, we anticipate progressing to an outline planning application prior to any future disposal. This will establish the principle of development, reducing uncertainty and unlocking the full development opportunity of the site.
- 3.14 Any disposal receipt is anticipated to be realised in 2028/2029, aligning with the consolidation of the school onto the Nevill Campus in September 2028. No commitment is being made through this report as to the eventual planning use of the Valley Campus. Decisions on planning matters will be taken through the appropriate planning processes, in due course.

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Capital Works and Funding

- 3.16 The capital works at the Nevill Campus are planned in two phases. Phase 1 (expected to reach practical completion in July/August 2028) comprises essential building works including:
- a classroom extension
 - dining room extension
 - toilet accommodation
 - relocation of SEN provision to the Modern Foreign Language block, and
 - associated drainage and utility diversions.
- 3.17 The estimated construction cost for Phase 1 is £3.9m, with professional services of £350,000, giving a Phase 1 total of £4,250,000.
- 3.18 Phase 2 (expected to reach practical completion in Summer 2029) comprises:
- internal remodelling of the Nevill Campus and
 - construction of a 3G artificial pitch, including required utility supply.
- 3.19 The estimated construction cost for Phase 2 is £3.2m, with professional services of £150,000, giving a Phase 2 total of £3,350,000. The combined estimated capital cost across both phases is approximately £7.6m.
- 3.20 Three capital funding streams are available to fund the constructions works required:

Basic Need	£5,554,314
Higher Needs Capital	£3,128,641
Section 106	£2,050,484
Total	£10,733,439

- 3.21 Any capital receipt arising from the disposal of the Valley Campus will be treated as a corporate capital receipt, available to the Council for deployment in accordance with its capital investment priorities. The disposal of the Valley Campus is not contingent on the completion of the capital works at the Nevill Campus; the two workstreams will be progressed in parallel, with the timing of disposal subject to planning and market conditions. It is the Council's proposal that a proportion of the receipt will be used to reimburse the High Needs Capital budget, further application of the receipt will be subject to the Council's normal capital allocation processes.
- 3.22 During the consultation period, the Governing Board of Hove Park School has been preparing its budget plan for 2026/27 and future years. The council has now seen a robust, peer-scrutinised, multi-year budget plan which demonstrates that the move to one site will place Hove Park School in a more robust and improved financial position, while remaining mindful of the level of EHCPs/SEN pupils and ensuring there is no impact on the SEN

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offer. This provides the assurance needed to proceed with the initiation of capital works.

4. Analysis and consideration of alternative options

- 4.1 Consideration has been given to continue with the two site model operating across both the Nevill and Valley campuses. This option has been considered carefully but is not recommended. The school's licensed deficit position is in large part a consequence of the additional costs associated with two-site operation, the logistical burden of organising two sites approximately one mile apart. Continuing on two sites would not address the underlying financial pressures and would leave the school without a clear path to long-term sustainability.
- 4.2 A second alternative considered was closure of one campus without capital investment to adapt the remaining site. This would require the school to operate from the Nevill Campus in its current form, which does not have sufficient classroom or dining capacity to accommodate the full school roll. This option is not viable without the works and would result in unacceptable conditions for pupils and staff.
- 4.3 The possibility of a merger or federation with another school was also considered as part of the Council's broader School Sustainability work. Consolidation onto a single site, with the school retaining its identity and leadership can offer a more proportionate and educationally preferable solution given the school's circumstances, and that a merger or federation would not in itself resolve the two-site cost pressures.
- 4.4 The proposal to consolidate onto the Nevill Campus rather than the Valley Campus reflects the relative size, condition and development potential of the two sites. The Nevill Campus is the larger of the two and is better suited to accommodate the full school roll following the works.
- 4.5 The option of closing Hove Park School has been carefully considered and has been rejected. As at May 2026, the school had 930 pupils on roll, and closure would present significant practical and educational challenges. There are approximately 1,127 surplus places across the remaining secondary schools, which would leave just 197 places free for new families moving into the city or for parents seeking a new school place from outside the city, should Hove Park School pupils need to be redistributed elsewhere. Places in other schools would also need to align with the specific year groups requiring allocation, further limiting practical options.
- 4.6 Closure would be particularly difficult for children and young people with SEN, who make up a significant proportion of the school population. Redistributing these pupils across other schools — potentially outside their local area — risks disrupting established support arrangements and could mean many are placed a considerable distance from home. This would also undermine pupils' sense of belonging and continuity, both of which are especially important for children with SEN. For these reasons, closure has not been pursued as a viable option.

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- 4.7 There is a combined PAN of 510 across Hove Park School and Blatchington Mill Schools. The secondary pupil forecasts indicate that between approximately 311 and 438 pupils from within the combined catchment area are expected to seek secondary places each year between 2026 and 2032 (Appendix 6). These figures represent a consistent surplus of places relative to the combined PAN of 510 and do not, by themselves, demonstrate sufficient demand to sustain two schools at their current admission numbers.
- 4.8 However, for the reasons set out in the report, closure is not considered to be the appropriate response in this case. The school continues to serve a significant number of pupils, including those already enrolled, and closure would cause considerable disruption to current and prospective families, many of whom would face significantly longer journeys to alternative schools. While closure would reduce surplus capacity across the city and remove the on-going financial burden of the school's licensed deficit from the Council, these considerations do not outweigh the impact on pupils and families, and the Council does not consider closure to be a proportionate or acceptable course of action.
- 4.9 More broadly, the level of surplus places across the city's secondary schools is a matter the Council keeps under ongoing review as part of its statutory duty to manage school place planning. Where surplus capacity persists across a number of schools, the Council may, in consultation with the Schools Adjudicator, consider whether a reduction in the Published Admission Number (PAN) at one or more other secondary schools would be a more appropriate mechanism for managing surplus places across the city, rather than the closure of an individual school. Any such change would be subject to the appropriate statutory process and consultation.

5. Community engagement and consultation

- 5.1 The Council has undertaken two rounds of public consultation on the proposal, in accordance with the requirements of the School Organisation (Prescribed Alterations to Maintained Schools)(England) Regulations 2013 and the Department for Education's statutory guidance on school organisation.
- 5.2 A first round of consultation ran from 22 April 2025 to 3 June 2025 and received 169 responses. Feedback from this consultation made clear that respondents wanted to see detailed plans, costings and visualisations before any decision was taken. In response to this feedback, the Council and school commissioned further architectural and design work to develop the proposals to a level of detail that would allow respondents to make an informed view.
- 5.3 A second round of public consultation ran from 13 April to 25 May 2026, accompanied by site plans, 3D visualisations, costings and a description of the educational model on a single site. Three public meetings were held: in person at the Valley Campus on 23 April, at the Nevill Campus on 27 April, and online on 6 May 2026 alongside the Your Voice online portal. The

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consultation was publicised through the school's website, the Council's website and Your Voice portal, and direct communication to parents and carers. A total of 109 responses were received via the Your Voice portal, with a completion rate of 96.5%, and two further submissions were received by email.

- 5.4 Ward councillors were briefed ahead of both rounds of consultation and have been kept informed of progress throughout the statutory process. The Cabinet Member for Children, Families and Youth Services and Cabinet Member for Finance and City Regeneration has been consulted at key stages of the proposal's development.
- 5.5 The statutory notice was published on 8 June 2026, opening a four-week representation period which closed on 6 July 2026. Notices were displayed at school entrances and gates, on both school websites, the Council website, the Your Voice portal and in the local media. Copies of the full proposal were sent to the Governing Boards of both schools, the Anglican and Catholic dioceses, local ward members, the Member of Parliament for Brighton Pavilion and the Department for Education. 9 formal representations were received during the representation period, a summary of which is provided at Appendix 5
- 5.6 The Council has had regard to the Community Engagement Framework in designing and delivering its engagement approach. The two-stage consultation process, with the second round specifically responding to feedback from the first, reflects the Council's commitment to meaningful engagement rather than consultation as a formality.

6. Financial implications

- 6.1 The report sets out the projected capital costs of the proposal, set across two phases. These costs, including professional services, are estimated at £7.6m and will be funded from a combination of basic and high needs education capital funding and section 106 resources.
- 6.2 In terms of the disposal of the Valley campus there are three scenarios, giving a range of indicative opinions of value falling between £5.4m and £10.56m. However, any such future disposal is subject to Secretary of State approval under a Section 77 application. It should be noted that, if permission is granted, the council intends that a proportion of the receipt will be used to reimburse the high needs capital budget.
- 6.3 As set out in the report, the proposal to consolidate to one site is intended to provide the most sustainable long-term option for the school, both educationally and financially. The latest budget plan does indicate an in-year surplus in from the 2029/30 financial year onwards.

Name of finance officer consulted: Steve Williams Date consulted:
23/06/2026

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7. Legal implications

- 7.1 The proposal to consolidate Hove Park School onto a single site at the Nevill Campus is a prescribed alteration to a maintained school and must be determined in accordance with the requirements of the Education and Inspections Act 2006, the School Organisation (Prescribed Alterations to Maintained Schools) (England) Regulations 2013, and relevant Department for Education statutory guidance. The Council must be satisfied that the required statutory process has been followed and that all consultation responses and representations have been taken into account before reaching a decision.
- 7.2 In making its decision, Cabinet must have due regard to its obligations under the Equality Act 2010 (the Public Sector Equality Duty) and should consider the Equalities Impact Assessment accompanying this report.
- 7.3 The proposed disposal of the Valley Campus will be subject to separate statutory approvals. Any disposal of school playing field land will require the consent of the Secretary of State under section 77 of the School Standards and Framework Act 1998.
- 7.4 Any future disposal of the Valley Campus must also comply with the Council's statutory obligations relating to the disposal of local authority land, including the duty to obtain best consideration where applicable.

Name of lawyer consulted: Sandra O'brien Date consulted: 26/06/26

8. Equalities implications

- 8.1 An Equalities Impact Assessment has been undertaken in respect of the proposal and is attached at Appendix 2. The EIA considers the impact of the consolidation and disposal on each of the protected characteristics under Section 149 of the Equality Act 2010, as well as on socio-economic disadvantage.

9. Sustainability implications

- 9.1 The capital works at the Nevill Campus will be specified to meet the Council's standards on energy efficiency, building services and materials, with a view to reducing the school's operational carbon footprint on a single site compared with the current two-site operation.
- 9.2 Consolidation onto a single site removes the daily movement of staff and resources between the two campuses and is expected to reduce overall site-related energy, water use and waste.
- 9.3 Any future use of the Valley Campus following disposal will be subject to the planning system, including consideration of sustainability matters as part of the relevant planning processes.

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Other Implications

10. Procurement implications

- 10.1 Procurement of the capital works at the Nevill Campus and the marketing of the Valley Campus for disposal will be undertaken in accordance with the Council's Contract Standing Orders, the Public Contracts Regulations 2015 (as amended), and the duty under section 123 of the Local Government Act 1972 in respect of disposal.

11. Conclusion

- 11.1 Consolidation onto a single site at the Nevill Campus offers Hove Park School a sustainable long-term future. It strengthens the educational offer, supports financial recovery from the licensed deficit, and enables the Council to make best use of its school estate.
- 11.2 The proposal has been the subject of two rounds of public consultation and a statutory representation period. The matters raised have been considered carefully. Weighing the consultation responses alongside the educational, financial and estate considerations, the view is that merging onto one site offers the most sustainable long-term future for the school.
- 11.3 Having now received sufficiently detailed financial planning from the Governing Board, the Council is satisfied that the proposed capital works and the move to one site will support Hove Park School in remaining a viable school and in making significant reductions to its historical deficit, on account of the efficiencies that will be realised. This financial assurance, together with the rejection of closure as a viable option for the reasons set out above, supports proceeding with the delivery of the proposed capital works.

Supporting Documentation

Appendices

- Appendix 1 Site Plans and 3D Images
Appendix 2 Equalities Impact Assessment
Appendix 3 Statutory Notice
Appendix 4 Full Proposal Information
Appendix 5 Summary of Formal Representations made during Statutory Notice
Appendix 6 Secondary School Pupil Forecast



GENERIC NOTES

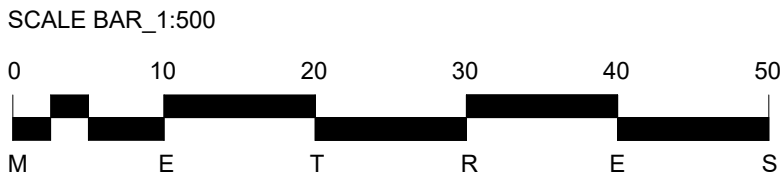
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Key

- Proposed New Extensions/Sport and Play Areas.

Rev	Date	Description
Drawing Status		
FOR INFORMATION		
		
Brighton & Hove City Council Property & Design Hove Town Hall, Norton Road Hove, East Sussex, BN3 3BQ Telephone 01273 290000		
Project Hove Park School Nevill Campus		
Title Single Site - Phase 1 As Proposed		
Location Plan		
Drawn By	Check 1	Check 2
MT	SDM	PT
Project No.	Scale	
ED 235	As indicated @A1	
Drawing No.	Revision	
HPS-BHCC-X-01-DR-A-0001		

Hove Park School
Location Plan
1 : 1000@A1



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- Proposed New Extensions/Sport and Play Areas.

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Brighton & Hove City Council
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Hove, East Sussex, BN3 3BQ
Telephone 01273 290000

Project
**Hove Park School
Nevill Campus**

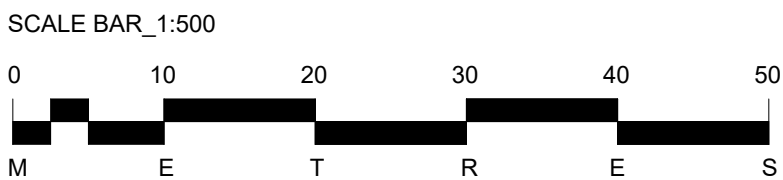
Title
**Single Site - Phase 1
As Proposed**

Site Plan

Drawn By	Check 1	Check 2	Date
MT	SDM	PT	09/12/25

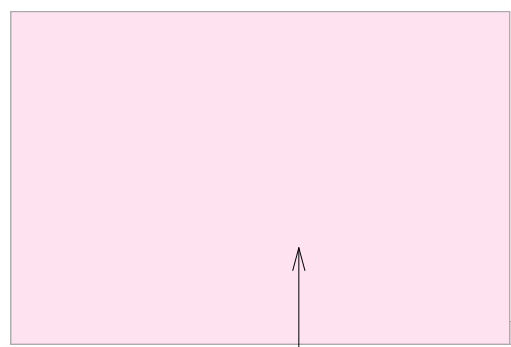
Project No.	Scale
ED 235	1 : 500 @A1

Drawing No.	Revision
HPS-BHCC-X-01-DR-A-0002	



Nevill Road

Old Shoreham Road



(New) KS3 Play ground
area supporting netball

(Extension) 100m²
Canteen

Existing driveway

(New) 730m², 2- storey General
Teaching Accommodation
(Classrooms 1-8)

Remodelled driveway (Cost
allowance TBC)

Existing Car Parking

Alternative location for canteen
extension, subject to specialist
modular supplier design
coordination

Indicative boundary Fence

-(Refurb.) SEN relocation to MFL classrooms
-(Refurb.) 1No general teaching classroom formed in
existing reprographic room
-(New build) Re-provide toilet accommodation from
MFL, location TBC

Existing Tennis Courts Footprint

Indicative boundary Fence

3G Football Pitch alternative
location (Option 2)

Indicative Drive way

(New) 3G Football Pitch With Floodlights (Option 1)

U16-11 a side 91 X 55m(Similar to Valley Campus)
(O/A U18-11 a side 97 X 61m)

(Refurb.)Existing Entrance / Site
Entrance Route

Indicative boundary Fence

Hove Park School
Site Plan
1 : 500@A1

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Project		
Hove Park School Nevill Campus		
Title		
Single Site - Phase 1 As Proposed		
3D images		
Drawn By	Check 1	Check 2
MT	SDM	PT
Project No.	Scale	
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Drawing Status		
FOR INFORMATION		
		
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Project Hove Park School Nevill Campus		
Title Single Site - Phase 1 As Proposed		
3D images		
Drawn By	Check 1	Check 2
MT	SDM	PT
Project No.		Date
ED 235		09/12/25
Drawing No.		Scale
HPS-BHCC-X-01-DR-A-0051		@A1
Revision		

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General Equality Impact Assessment (EIA) Form

Support:

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

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

Processing Time:

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

Process:

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

1. Assessment details

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

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

Name of activity or proposal being assessed:	The proposed consolidation of Hove Park School onto a single site at the Nevill Campus, with effect from September 2028, and the associated release and disposal of the Valley Campus.
Directorate:	Families, Children & Wellbeing
Service:	Education and Learning
Team:	Education
Is this a new or existing activity?	Existing activity under review. The proposal is a prescribed alteration to an existing maintained secondary school under Section 19 of the Education and Inspections Act 2006 and the School Organisation (Prescribed Alterations to Maintained Schools)(England) Regulations 2013

Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)	No related EIAs have yet been completed, as no decision on this proposal has yet been taken and this is the first EIA relating to it. A separate EIA covering any staff reorganisation arising from the consolidation will be prepared if and when a decision to proceed is taken and a restructuring process commences.
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2. Contributors to the assessment (Name and Job title)

Responsible Lead Officer:	Richard Barker, Head of Education
Accountable Manager:	Georgina Clarke-Green, Director of Education and Learning
Additional stakeholders collaborating or contributing to this assessment:	

3. About the activity

Briefly describe the purpose of the activity being assessed:

Hove Park School is a maintained secondary school in Brighton & Hove operating across two campuses: the Nevill Campus (Nevill Road) and the Valley Campus (off Hangleton Way). The school's Governing Body, in conjunction with the Local Authority, has concluded that operating across two sites is not sustainable in the long term, both educationally and financially.

The proposal is to consolidate all of Hove Park School's provision onto the Nevill Campus with effect from September 2028. To accommodate the whole school population on a single site, a two-phase programme of capital works is required at the Nevill Campus, including a classroom extension, dining room expansion, improved toilet accommodation, enhanced SEN provision and, in Phase 2, internal remodelling and a 3G artificial pitch.

Subject to Cabinet approval, the Valley Campus would be released for disposal.

The proposal has been the subject of two rounds of public consultation. A first round ran in spring 2025 (169 responses). A second statutory consultation, accompanied by detailed plans and visualisations, ran from 13 April to 25 May 2026, followed by a four-week statutory representation period from 8 June to 6 July 2026.

What are the desired outcomes of the activity?

The desired outcomes of the proposal are:

- A financially sustainable secondary school operating from a single, fit-for-purpose site at the Nevill Campus;
- An enhanced educational offer, including a distinct teaching block, canteen area and playground for Years 7 and 8, supporting the transition from primary school;
- Continued and enhanced access to specialist facilities across the school;
- An improved SEN environment on the Nevill site;
- Continuity of education for all pupils through and beyond the consolidation;
- Fair and supportive treatment of all staff through any reorganisation arising from the move;
- A managed and well-communicated transition that meets the needs of pupils, families, staff and the surrounding community;

In framing these desired outcomes, the Council has had regard to the three aims of the Public Sector Equality Duty (PSED) under section 149 of the Equality Act 2010: to eliminate unlawful discrimination,

harassment and victimisation; to advance equality of opportunity between people who share a relevant protected characteristic and those who do not; and to foster good relations between people who share relevant protected characteristic and those who do not.

The outcomes relating to an improved SEN environment, continuity of education for all pupils, and a managed and well-communicated transition are intended to advance equality of opportunity for pupils with protected characteristics. Fair and supportive treatment of staff through any re-organisation arising from the move intended to ensure that any selection process is free from unlawful discrimination. The zoning of the consolidated site will help to retain a distinct lower-school environment, and the retention of pastoral structures and trusted relationships through the transition which are intended to foster good relations between pupil groups, including those sharing protected characteristics, as the school moves to a single site.

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

The groups considered more likely to be affected by this activity include:

- pupils currently on roll at Hove Park School and future cohorts, particularly those with SEND (including the 89 pupils with EHCPs and 234 pupils on SEN Support)
- pupils eligible for Pupil Premium (34.8% of the roll)
- Looked After Children and care experienced pupils
- Young carers
- EAL pupils and those from migrant or refugee backgrounds
- LGBTQ+ and trans/non binary pupils
- Pupils in Years 7 and 8 undergoing the transition from primary school
- School staff – particularly those with caring responsibilities
- The wider local community – including residents near both campuses
- Neighbouring schools and feeder primary schools
- Providers of community facilities, such as after-school clubs, breakfast clubs and local libraries that may experience changes in demand as a result of the consolidation.

4. Consultation and engagement

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

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

The proposal has been subject to two rounds of public consultation, supplemented by direct engagement with the school community, staff, Governors and Members.

First round (spring 2025): an initial public consultation was undertaken on the principle of consolidation, with a proposed implementation date of September 2027. 169 responses were received via the Council's Your Voice portal and by email. Feedback from this consultation made clear that respondents wanted to see detailed, well-developed plans before any decision was taken.

Second round (13 April to 25 May 2026): a second consultation ran for just under seven weeks, accompanied by detailed site plans, 3D visualisations, costings, and a description of the educational model on a single site. The Your Voice consultation page received 1,320 visitors and 108 Your Voice responses were received, with a 96.5% completion rate as well as 2 email submissions. The consultation was promoted through letters to parents, carers, staff and Governors; a dedicated Your Voice page; three public meetings (one in person on the Valley Campus on 23 April 2026, one in person at the Nevill Campus on 27 April 2026 and one online on 6 May 2026); engagement with the School Council;

meetings with the Hove Park Forum and local ward Councillors; and direct contact with feeder primary schools.

Phase 1

The Phase 1 consultation was open and accessible to all members of the community, with the survey available online throughout the consultation period. A total of 164 responses were received, representing a participation rate of 8.2% of the 1,999 unique visitors to the consultation page.

Of the 164 respondents, 157 were asked whether they wished to complete equalities monitoring questions, of whom 63 (40%) chose to do so. Among those who provided ethnicity data, the large majority identified as White British (47 respondents), with small numbers identifying as White: Irish (1), Other Ethnic Group: Arab (1), Black or Black British: Any Other Black Background (1), and Black or Black British: Caribbean (1), and Asian or Asian British: Bangladeshi (3). No respondents identified as Asian or Asian British: Chinese, Indian, or Pakistani, nor as mixed heritage.

The low number of responses from racially minoritised communities reflects the demographic profile of the areas from which the majority of respondents were drawn, principally BN3 and BN41 postcodes covering Hove and Portslade. The council is mindful that responses from racially minoritised communities may be under-represented and will continue to ensure that engagement with these groups is proactively considered through any further involvement or implementation activity.

Phase 2

The Phase 2 consultation was similarly open and accessible to all stakeholders, with 109 surveys submitted from 1,320 visitors to the consultation page (a participation rate of 8.0%). The equalities monitoring questions in Phase 2 were optional, and a higher proportion of respondents chose not to complete them, with 60 of the 109 respondents leaving the ethnicity question blank. Of the 49 who did respond, 43 identified as White: English, Welsh, Scottish, Northern Irish or British, 4 as White: Irish, 1 as White: Roma, and 1 as Mixed: Black Caribbean and White. No respondents from other racially minoritised backgrounds completed this section.

Responses were concentrated in the Hangleton & Knoll and Westdene & Hove Park wards (25 respondents each), which are areas with predominantly White demographic profiles. As with Phase 1, the council acknowledges that the consultation may not have reached all sections of the community equally, and the absence of responses from racially minoritised groups does not indicate an absence of interest or impact. The consultation process was designed to be as inclusive and accessible as possible, and equalities considerations have been central to the council's assessment of the proposed changes throughout.

Statutory representation period (8 June to 6 July 2026): a statutory notice was published in accordance with the Education and Inspections Act 2006 and the School Organisation (Prescribed Alterations to Maintained Schools) (England) Regulations 2013.

Seventeen representations were received during the statutory notice period (fourteen online, three by email), reflecting a mixed response to the proposal to consolidate Hove Park School onto the Nevill Campus. While some respondents supported consolidation in principle, concerns were raised regarding the potential impact on local residents, including increased traffic and parking pressure around Nevill Road and Nevill Avenue, noise and light disturbance from the proposed sports pitch, and loss of green space. A number of respondents also raised concerns about the financial impact on the school and questioned whether adequate weight had been given to residents' views during consultation. These issues will be considered through the detailed design and planning process, including further engagement with affected neighbours on the siting of sports facilities.

Materials were available in alternative formats and translation on request. Specific support was offered to families with English as an additional language and to those who needed help to access the online consultation.

5. Current data and impact monitoring

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

(State Yes, No, Not Applicable as appropriate)

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

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

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

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

Gathering Equalities Data: Approach and Actions

Whilst the consultation surveys included voluntary equalities monitoring questions covering characteristics such as sex, gender identity, ethnicity and disability, the optional nature of these questions and the relatively low completion rate means that the data gathered does not provide a complete picture across all protected characteristics. Notably, the surveys did not include questions on religion or belief, which is a recognised gap.

To address this, the council will draw on a range of existing data sources to supplement the consultation responses. These include the 2021 Census data for the relevant wards (principally Hangleton & Knoll, Westdene & Hove Park, Central Hove and Wish), which provides detailed breakdowns by religion or belief, sex, age and ethnicity at a local level. Where data on the school's own population is relevant, the school's annual census returns to the Department for Education (DfE) will be used, which record pupil characteristics including free school meal eligibility, SEND status and ethnicity.

In addition, the council will take the following steps to strengthen its equalities evidence base as the project progresses through implementation. The school will be asked to share relevant pupil characteristic data to enable the council to assess whether any particular groups are disproportionately affected by the consolidation, including in relation to travel distance and access to SEND provision. For characteristics not captured through the consultation — in particular religion or belief and pregnancy or maternity — the council will consider whether a targeted engagement exercise with relevant community groups or faith organisations in the local area is warranted, particularly if implementation decisions are likely to have differential impacts on those groups. Progress against these actions will be reviewed as part of the ongoing EIA monitoring process, with the EIA updated accordingly should material new information come to light.

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

Actions in this EIA will be transferred to the Hove Park Programme Board action log, the School Organisation Service Plan, and the Directorate Fair and Inclusive Action Plan (FIAP) for monitoring. Progress will be reported to the relevant Head of Service quarterly and to the EDI Team as part of FIAP performance reporting and auditing. The EDI Team will be notified and this EIA will be logged on the Directorate EIA Tracker.

6. Impacts

Advisory Note:

- **Impact:**
 - Assessing disproportionate impact means understanding potential negative impact (that may cause direct or indirect discrimination), and then assessing the relevance (that is: the potential effect of your activity on people with protected characteristics) and proportionality (that is: how strong the effect is).
 - These impacts should be identified in the EIA and then re-visited regularly as you review the EIA every 12 to 18 months as applicable to the duration of your activity.
- **SMART Actions mean:** Actions that are (SMART = Specific, Measurable, Achievable, Realistic, T = Time-bound)

- **Cumulative Assessment:** If there is impact on all groups equally, complete **only** the cumulative assessment section.
- **Data analysis and Insights:**
 - In each protected characteristic or group, in answer to the question ‘If “YES”, what are the positive and negative disproportionate impacts?’, describe what you have learnt from your data analysis about disproportionate impacts, stating relevant insights and data sources.
 - Find and use contextual and wide ranges of data analysis (including community feedback) to describe what the disproportionate positive and negative impacts are on different, and intersecting populations impacted by your activity, especially considering for [Health inequalities](#), review guidance and inter-related impacts, and the impact of various identities.
 - For example: If you are doing road works or closures in a particular street or ward – look at a variety of data and do so from various protected characteristic lenses. Understand and analyse what that means for your project and its impact on different types of people, residents, family types and so on. State your understanding of impact in both effect of impact and strength of that effect on those impacted.
- **Data Sources:**
 - **Consider a wide range (including but not limited to):**
 - [Population and population groups](#)
 - [Census 2021 population groups Infogram: Brighton & Hove by Brighton and Hove City Council](#)
 - [Census](#) and [local intelligence data](#)
 - Service specific data
 - Community consultations
 - Insights from customer feedback including complaints and survey results
 - Lived experiences and qualitative data
 - [Joint Strategic Needs Assessment \(JSNA\) data](#)
 - [Health Inequalities data](#)
 - Good practice research
 - National data and reports relevant to the service
 - Workforce, leaver, and recruitment data, surveys, insights
 - Feedback from internal ‘staff as residents’ consultations
 - Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
 - Insights, gaps, and data analyses on ‘who’ the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.
- Learn more about the [Equality Act 2010](#) and about our [Public Sector Equality Duty](#).

6.1 Age

Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: older people, people who may be housebound, those under 16, young adults, with other intersections.	YES
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If “YES”, what are the positive and negative disproportionate impacts?

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

The proposal affects pupils aged 11–16 and a small number of Year 12/13 pupils with EHCPs currently on roll at Hove Park School, including Year 7 pupils who will be joining in September 2027, as this cohort
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will move at the start of Year 8 to the Nevill Campus. It will also affect future cohorts of Year 7 pupils joining the school from September 2028 onwards.

Consultation evidence on transition: a significant number of respondents to the second consultation valued the current two-site arrangement specifically because it eases the transition of younger pupils from primary school and, in respondents' view, reduces exposure of Year 7s and 8s to older year groups, bullying and social hierarchy. Several respondents questioned whether the benefits of consolidation outweighed the loss of this feature. This evidence has been taken seriously and has shaped the design of the consolidated site as follows:

- A dedicated teaching block, canteen area and playground for Years 7 and 8 on the consolidated site;
- Separate timetables for breaks and playtimes to retain a distinct lower-school feel;
- Use of the Old Shoreham Road entrance to support a calmer arrival and dispersal experience for KS3 pupils;
- Zoning of the site to protect a clearly identifiable Year 7/8 environment, in direct response to the consultation theme that called for protected lower-school spaces.

The transition phase (September 2026 — September 2028) is also a relevant consideration. The youngest pupils affected by the transition itself will be those joining the school in September 2027 (currently in Year 5) who will spend the first year of their secondary schooling on the Valley Campus before moving across, and September 2028 (currently in Year 4), who will move directly to the Nevill Campus. Pastoral and transition support will be provided to these cohorts specifically.

Staff: workforce age data will be reviewed through any restructure as part of the consolidation and a separate age-related impact assessment undertaken should redundancy or redeployment processes be required. The Council's HR procedures, including avoidance of age-discriminatory selection criteria, will apply.

6.2 Disability:

Does your analysis indicate a disproportionate impact relating to Disability , considering our anticipatory duty ?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

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

Hove Park School educates a significant number of pupils with SEND, including 89 pupils (9.46%) with EHCPs and 234 pupils (24.9%) on SEN Support.

Consultation evidence: SEND was one of the most prominent themes raised through the second consultation. Respondents called specifically for:

- Clearly defined and protected SEND spaces that would not be eroded under operational pressure;
- Quiet and sensory areas accessible at break and lunch times as well as in lesson time;
- Zoning of the consolidated site to retain a distinct lower-school feel for younger SEND pupils;
- Operational detail on staffing, supervision and transition arrangements, not just physical space.

These specific points have shaped the design and mitigation programme as follows:

- Enhanced SEN provision is included within the Phase 1 capital works at the Nevill Campus, including a purpose-designed SEN base and quiet/calming spaces;
- The design of the SEN base and associated quiet/sensory areas will be developed in partnership with SENSS, BHISS and the school's SENCo, with sign-off referenced as SMART Action 3;

- All EHCPs will continue to be delivered in accordance with the statutory plan, with annual reviews used as the formal mechanism for any changes to provision;
- Individual transition plans will be put in place for pupils with the most complex needs (SMART Action 1), with operational detail (staffing, supervision, induction) confirmed in advance of September 2028;
- Build phasing has been designed to minimise disruption to teaching and to vulnerable pupils, with sensitive scheduling of noisier elements outside teaching time where possible.

Staff disability: any staff restructuring will follow the Council's HR procedures, including reasonable adjustment obligations under the Equality Act 2010.

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

The council and school are committed to ensuring that the consolidation onto the Nevill Campus does not disadvantage disabled pupils, staff, or members of the wider school community, and that the design and implementation of the project actively promotes equality of access and experience.

The capital works programme will be required to meet current accessibility standards, including compliance with Part M of the Building Regulations, ensuring that all new and refurbished buildings, circulation routes, and outdoor spaces are accessible to wheelchair users and those with mobility impairments. The design process will give specific consideration to the needs of pupils with sensory impairments, including appropriate lighting levels, acoustic treatment to support those with hearing impairments, and clear wayfinding to assist those with visual impairments or cognitive differences.

The existing SEND provision, including the Cullum Centre, will be safeguarded within the consolidated site, and the school's SEND team will be closely involved in reviewing the detailed design proposals to ensure that specialist spaces meet the therapeutic and educational needs of pupils who currently access them.

Particular attention will be paid to the needs of autistic pupils and those with social, emotional and mental health (SEMH) needs, given the concerns raised through the consultation about the potential impact of a larger, busier single-site environment; this will include the retention of quiet breakout spaces, sensory areas, and clearly defined lower school zones that reduce exposure to the full scale of the site during the transition period. The council will keep these adjustments under active review throughout the construction and implementation phases, and will engage with the school's SEND team, the Local Area SEND Partnership, and where appropriate with disabled pupils and their families, to ensure that the measures in place remain effective and responsive to identified need.

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

Does your analysis indicate a disproportionate impact relating to ethnicity?	YES
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If "YES", what are the positive and negative disproportionate impacts?

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

Hove Park School serves a mixed and diverse community. The school's pupil ethnic profile is broadly in line with the Brighton & Hove secondary average. The proposal does not alter the catchment area, the

admissions arrangements, or the school's PAN beyond what is necessary to align with the single-site capacity.

Pupil Demographic profile: Data drawn from the most recent October school census indicates that Hove Park School serves a diverse pupil population. The largest ethnic group is White British, accounting for 62.7% of pupils, with a further 7% identifying as White Other and 7% recorded under other ethnic categories. Racially minoritised pupils make up a significant proportion of the school roll, including 3.8% Asian, 2.4% Asian Bangladeshi, 2.5% Black Caribbean, 2.5% Mixed White and Black Caribbean, and 2.3% Mixed Other. Twenty-five percent of pupils speak English as an Additional Language (EAL), which is notably higher than the national average and reflects the diversity of families living within the school's catchment and surrounding areas. The proportion of pupils eligible for Free School Meals stands at 35.6%, which is significantly above the national average and indicates that a substantial minority of the school's pupils come from lower-income households.

This demographic profile underlines the importance of ensuring that the proposed consolidation onto the Nevill Campus does not create barriers to access or participation for any group, and that the equalities implications of the proposal are carefully assessed with this breadth of need and background in mind.

Workforce demographic profile: a demographic breakdown of Hove Park School's workforce (154 staff records) shows that, by ethnicity, 91.6% of staff are recorded as White (84.4% White British and 7.1% White – any other White background), with 7.8% from Black, Asian, Mixed or other minoritised ethnic backgrounds (including Asian or Asian British – Pakistani, Asian or Asian British – Indian, Chinese, Mixed – Black Caribbean and White, and any other ethnic background), and 0.6% recording 'Prefer not to say'. By gender, 63.6% of staff are female and 36.4% are male. This profile does not currently distinguish between teaching and support staff; a teaching-only breakdown can be produced if required. This workforce profile will be kept under review alongside the pupil demographic data referenced above and will inform the equality-protected approach to selection set out below, should any staff restructuring be required.

Consolidation onto a single site will bring pupils from different parts of the school's catchment together physically. The school's existing equality, anti-bullying and inclusion policies will continue to apply. The pastoral structure, including pastoral leads for each year group, will be retained on the consolidated site.

No disproportionate negative impact on any specific ethnic group has been identified. The Council and the school will continue to monitor admissions, attendance, behaviour and outcomes data by ethnicity through and beyond the transition.

Staff: workforce monitoring data will be reviewed through any restructure, and equality-protected approaches to selection will apply such as:

- Having objective job-related selection criteria that is applied consistently to all at-risk employees
- Ensuring that reasonable adjustments are in place for anyone with a disability or health condition, and that outcomes are monitored against protected characteristic data before decisions are confirmed
- Ensuring that certain groups have additional protections, such as those on maternity leave, those with caring responsibilities (which can disproportionately be those who are female).

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

Does your analysis indicate a disproportionate impact relating to Religion, Belief, Spirituality, Faith, or Atheism?	NO
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If "YES", what are the positive and negative disproportionate impacts?

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

Hove Park School is a secular community secondary school. The proposal does not change the school's character or its arrangements for collective worship, RE provision, or accommodation of religious observance (including prayer space and dietary requirements).

The same arrangements that currently support pupils and staff of all faiths and none will operate on the consolidated site. No disproportionate impact on people sharing the protected characteristic of religion or belief has been identified.

Collective worship and prayer space: the school's current arrangements for collective worship are delivered through tutor time, Philosophy, Religion and Ethics (PRE) lessons, and assemblies; these arrangements will not change as a result of the consolidation. As a non-faith school, Hove Park does not have dedicated prayer rooms. At specific times of the year, including during Ramadan, rooms are made available for use as prayer space at break and lunchtimes, and this practice will continue on the consolidated site, with appropriate rooms identified as part of space planning for the Nevill Campus. This will ensure that pupils and staff of all faiths continue to have access to suitable spaces for religious observance at the times these are needed.

6.5 Sex:

Does your analysis indicate a disproportionate impact relating to Sex	NO
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If "YES", what are the positive and negative disproportionate impacts?

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

Hove Park School is a co-educational school. The proposal does not change the admissions arrangements or the gender balance of the school.

Toilet and changing facilities at the Nevill Campus will be improved as part of the capital works, with gender-appropriate provision and accessible facilities included.

Staff: women make up a significant proportion of the school's workforce, including in teaching and support roles. Any reorganisation arising from the consolidation will follow Council HR procedures with reference to part-time and flexible working patterns, which disproportionately involve women.

Travel times: the change of site may result in some pupils and staff experiencing different journeys to school, as set out in Section 6.16 (Socio-economic Disadvantage) and the School Travel Plan. The Council has considered whether this could have a disproportionate impact by sex. Personal safety while travelling, particularly during darker winter mornings and evenings, can be a heightened concern for women and girls, and the Travel Plan will include consideration of safe routes, lighting and crossing points on the approaches to the Nevill Campus identified through consultation. For staff, the Council recognises that women are more likely to hold caring responsibilities and to work part-time or flexible hours; any change to journey times or working patterns arising from the consolidation will be discussed individually with affected staff as part of any restructuring process, with reasonable adjustments considered on a case-by-case basis. No disproportionate impact specific to sex, beyond these general travel considerations which apply to the wider school community, has been identified.

6.6 Gender and Gender Reassignment:

Does your analysis indicate a disproportionate impact relating to Gender Identity (including non-binary and intersex people)?	NO
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If "YES", what are the positive and negative disproportionate impacts?

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

Does your analysis indicate a disproportionate impact relating to Gender Reassignment ?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

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

The Council recognises that moving to a single site could mean that trans and non-binary pupils encounter staff and peers who are not already aware of their gender identity or history, which could create a need for new disclosures in less familiar settings. To mitigate this, information about individual support arrangements for trans and gender-questioning pupils will be transferred sensitively, ahead of the transition and on a need-to-know basis, to relevant staff at the consolidated site, so that pupils are not required to repeat disclosures unnecessarily. The pastoral team will work with affected pupils and their families ahead of September 2028 to agree how, and to whom, information is shared, and to ensure that trusted relationships and support arrangements are carried across to the new site.

The school's existing policies and practice on supporting trans and gender-questioning pupils will continue to apply on the consolidated site. Pastoral arrangements, including the trusted relationships pupils may have built with key staff, will be preserved wherever possible through the transition, and information about individual support arrangements will be transferred sensitively and on a need-to-know basis to the Nevill pastoral team for those pupils currently on the Valley Campus.

Single-occupancy and accessible toilet facilities will be retained and enhanced on the consolidated site

6.7 Sexual Orientation:

Does your analysis indicate a disproportionate impact relating to Sexual Orientation ?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

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

The proposal does not affect the school's policies or practice in relation to LGBTQ+ pupils and staff, all of which will continue to apply on the consolidated site. The school's PSHE and RSE curriculum, and its anti-bullying work, are unaffected by the proposal

The Council recognises that LGBTQ+ pupils who have established trusted relationships with specific staff, or who are part of supportive peer networks (for example LGBTQ+ or diversity groups) at one site, may feel particularly vulnerable if those networks are disrupted by the move to a single site. To mitigate this, the pastoral team will work with affected pupils ahead of the transition to understand what support and relationships are most important to them, and will plan for trusted staff and peer support networks to continue, or be re-established, on the consolidated site. Where a pupil currently relies on a specific member of staff for support, the school will, where possible, maintain that relationship or put in place a clear, planned handover to a new trusted member of staff before September 2028, so that pupils are not left without support during the transition.

6.8 Marriage and Civil Partnership:

Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

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

Not applicable in respect of pupils. For staff, the Council's HR policies (including those relating to bereavement, leave and benefits) apply equally to married and civil partner colleagues and will continue to do so through any reorganisation.

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

Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

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

There is no impact on pupils. For staff, any consultation on restructuring will follow the Council's policies on maternity, paternity, adoption and shared parental leave, including the protections from selection for redundancy whilst on maternity leave. HR will undertake a specific review of staff currently on or planning maternity/adoption leave at the point of any restructure.

6.10 Armed Forces Personnel, their families, and Veterans:

Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

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

The proposal does not change the school's admission arrangements or its support for children with Armed Forces families, including Service children eligible for the Service Pupil Premium, which is recorded through the school census. There are no Service children on roll at Hove Park.

The consolidation onto a single site does not, of itself, increase that vulnerability and no disproportionate negative impact on the Armed Forces community has been identified. Existing pastoral arrangements, including the use of the Service Pupil Premium to support continuity and wellbeing will continue on the consolidated site. Where a Service child joins or leaves the school during the transition period, the school's standard induction and transition support will apply, with regard to any additional needs arising from their family circumstances.

6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

Does your analysis indicate a disproportionate impact relating to Expatriates, Migrants, Asylum seekers, Refugees, those New to the UK, and UK visa or assigned legal status? (Especially considering for age, ethnicity, language, and various intersections)	NO
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If “YES”, what are the positive and negative disproportionate impacts?

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

The proposal does not change the school's admission arrangements and does not affect the entitlement of any pupil to a school place. Pupils from migrant, asylum-seeking and refugee backgrounds will continue to be supported through the school's pastoral arrangements, EAL provision and links to EMAS. The school is not the principal admitting school for unaccompanied asylum-seeking children in the city, but where such pupils are on roll, individual transition plans for the consolidation will reflect the additional support they may need (including in relation to trauma-informed practice and continuity of trusted adults).
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6.12 Carers:

Does your analysis indicate a disproportionate impact relating to <u>Carers</u> (Especially considering for age, ethnicity, language, and various intersections).	YES
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If “YES”, what are the positive and negative disproportionate impacts?

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

The proposal affects both young carers on roll at the school and adult carers within the school community (parents, carers, and staff with caring responsibilities). Young carers may be particularly sensitive to changes in routine, journey time and the demands of moving between sites during the transition phase, and the school's pastoral team holds information on identified young carers and will work with the Carers Centre and families to ensure arrangements support attendance and wellbeing. For adult carers, any change in start, finish and break times arising from operating on a single site has been considered and timings will be communicated well in advance to enable carers to plan. Flexibility around drop-off and pick-up times will be supported where this can be arranged. A number of intersections compound this impact and have been considered: • Age – younger pupils in Years 7 and 8 who are also young carers may find a larger, busier single-site environment more difficult to navigate alongside their responsibilities at home, and will be prioritised within the zoned lower-school arrangements and pastoral support provided. • Ethnicity and language: carers from Black and Racially minoritised communities and those from families with English as an additional language may face additional barriers in accessing information about the transition, raising concerns, or arranging the practical support they need. Communication about the consolidation will be made available in accessible formats and translated on request. • Socio-economic disadvantage: carer families on low incomes may be least able to absorb changes in travel cost or journey time and will be prioritised to help access any funding.
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- Proximity and attendance: young carers, who are disproportionately from lower-income households, often rely on living close to school to balance their caring responsibilities at home with attendance. A longer or more complex journey to the Nevill Campus could increase the risk of persistent absence for this group. The school's pastoral team will work with identified young carers and their families ahead of the transition to understand individual journey requirements, and the travel planning set out in Section 6.16 will give specific consideration to young carers, including, where appropriate, flexibility around start times and prioritisation for any travel assistance.

The transition working group will maintain oversight of young carers with intersecting vulnerabilities and ensure that bespoke support is in place.

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

Does your analysis indicate a disproportionate impact relating to Looked after children, Care Leavers, Care and fostering experienced children and adults (Especially considering for age, ethnicity, language, and various intersections).

Also consider our [Corporate Parenting Responsibility](#) in connection to your activity.

YES

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

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

Pupils who are looked after, previously looked after or otherwise care-experienced may be more vulnerable to disruption from a change of site, environment or peer group. There are currently **XXX** LAC pupils on roll at Hove Park School.

Mitigation: the Virtual School Head and the school's Designated Teacher for LAC will be members of the Transition Working Group. Each LAC pupil will have their Personal Education Plan (PEP) updated to reflect the consolidation, with specific actions to support continuity of trusted relationships, pastoral support and access to specialist services through the transition. Where appropriate, the views of the pupil and their carers will be sought in the planning of individual transition arrangements.

6.14 Homelessness:

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

YES

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

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

Some pupils at Hove Park School live in temporary or insecure accommodation. The proposal does not, of itself, increase or reduce that population. However, the change in site may require some families to revisit travel arrangements.

Mitigation: families known to the school as being in temporary accommodation will be proactively engaged through the school's pastoral team to ensure travel is feasible and affordable; the school's existing arrangements for free or subsidised uniform and equipment will continue.

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

Does your analysis indicate a disproportionate impact relating to Domestic Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)?	NO
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If "YES", what are the positive and negative disproportionate impacts?

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

Existing safeguarding arrangements, including Operation Encompass and the school's Designated Safeguarding Lead network, are unaffected by the proposal and will continue on the consolidated site. Information about pupils in vulnerable family circumstances will continue to be held and transferred only in accordance with safeguarding policy.

6.16 Socio-economic Disadvantage:

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

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

Pupil Premium eligibility at Hove Park School is 34.8% of the roll. The proposal does not change Pupil Premium funding, which follows the pupil.

Consultation evidence on travel: travel, road safety and parking around the Nevill Campus was the second most-raised theme in the second consultation. Respondents identified specific concerns about congestion at drop-off and pick-up on Nevill Road, Nevill Avenue and Old Shoreham Road; pedestrian and cycle safety; overspill parking on residential streets; and the cumulative effect of nearby housing development. Although these are primarily local amenity points, they have a direct socio-economic dimension: for families on low incomes who walk, cycle or rely on the bus, the safety and feasibility of those routes is critical to access.

Change in travel arrangements and transport costs: from September 2028, pupils, families and staff currently based at or travelling to the Valley Campus will travel instead to the Nevill Campus. Both sites are within the Hove area; nonetheless, for some families the change in route, walking or cycling distance, or bus service used may result in a longer or more costly journey, and for families on low incomes this could present a barrier without mitigation. As part of the School Travel Plan, the Council and the school will map current and future journeys for pupils currently attending the Valley Campus against home postcodes, to quantify the change in distance and journey time and to identify those pupils for whom the change is most significant, so that the mitigations below can be targeted accordingly.

The School Travel Plan will incorporate:

- An assessment of bus routes serving the Nevill Campus and engagement with Brighton & Hove Buses on capacity at school start and end times;
- Cycle and walking route improvements around the Nevill Campus, including pedestrian and cycle safety measures on the key approach roads identified through consultation;
- Information for families on travel options, including any entitlement to home-to-school transport where the statutory distance criteria are met;
- Specific outreach to families known to be on low incomes or in temporary accommodation, to confirm that travel arrangements are feasible and affordable in good time before September 2028
- For families identified through this outreach as facing a genuine barrier to travel that is not feasible or affordable, the school and Council will: confirm entitlement to free home-to-school transport against the statutory walking distance criteria; signpost to existing discretionary travel assistance schemes administered by the Council; and, in exceptional individual cases that cannot be resolved through the above, consider what further support can reasonably be put in place, working with the family, before September 2028. The Transition Working Group will monitor the number and outcome of cases handled in this way as part of its oversight of the transition.

Digital exclusion: information about the consolidation, transition and any changes to school routines will be provided through multiple channels (paper letters, school app/website, in-person briefings) to ensure families without reliable digital access are not disadvantaged. This responds directly to the consultation theme that respondents wanted more accessible information about the project.

Uniform and equipment: any changes to uniform expectations arising from the consolidation will be kept to the minimum necessary, and the school's existing arrangements for supporting families with the cost of uniform will continue.

6.17 Human Rights:

Will your activity have a disproportionate impact relating to Human Rights?	NO
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If "YES", what are the positive and negative disproportionate impacts?

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

The proposal has been considered against the rights protected by the Human Rights Act 1998 and the European Convention on Human Rights, including in particular:

- Article 2 of Protocol 1 (right to education): every pupil currently on roll will continue to have a school place at Hove Park School. The proposal preserves, and is intended to enhance, the educational offer;
- Article 8 (right to respect for private and family life): potential interference is limited and proportionate, relating to changes in routine, travel and pastoral arrangements; mitigations are described above;
- Article 14 (non-discrimination): the proposal does not differentiate between groups on the basis of any protected characteristic, and disproportionate impacts identified in this EIA are subject to specific mitigation.

The Council has conducted public consultation, published a statutory notice, considered representations in full, and complied with the procedural requirements of the Education and Inspections Act 2006.

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

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

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

- Certain groups of pupils may experience the combined effect of more than one of the impacts identified above. The groups most likely to experience cumulative and intersectional impact are:
- Pupils with SEND who are also Looked After or care-experienced: these pupils will be co-managed by the Designated Teacher for LAC, the SENCo and the Virtual School Head;
- Pupils with SEND from socio-economically disadvantaged households: priority for travel planning support and continuity of provision;
- Carers and young carers with SEND: pupils who are both carers (or young carers) and have SEND may face a compounded impact in adjusting to a new site, balancing caring responsibilities, navigating a larger single-site environment and accessing SEN provision. These pupils will be jointly supported by the SENCo and the school's young carers lead, with individual transition plans reflecting both sets of needs;
- EAL pupils from migrant or refugee backgrounds with insecure housing: priority for proactive communication and engagement through EMAS and the pastoral team;
- Young carers from low-income households: priority for travel planning support and pastoral engagement.
- Disabled pupils from deprived households: disabled pupils from low-income families may face a compounded impact where, for example, the cost or feasibility of travel interacts with mobility or access needs. These pupils will be prioritised for both the SEND transition planning set out in Section 6.2 and the travel planning support set out in Section 6.16;
- Wider community impact: the consolidation will bring together, on the Nevill Campus, the pupil population currently split across two sites. The Council has considered whether this could have a knock-on effect on local community facilities, such as libraries, after-school clubs and youth provision in the vicinity of the Nevill Campus, particularly around the school day. As part of the Travel Plan and transition communications, the Council and the school will engage with relevant local providers to understand any change in demand and, where necessary, work with them to manage capacity.

- The Transition Working Group will maintain oversight of pupils with intersecting vulnerabilities and will ensure that bespoke support is in place for each. The Council acknowledges that the intersection of protected characteristics can compound disadvantage and is committed to ensuring no group is left behind in the transition.

7. Action planning

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

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

1. Transition and SEND Support for vulnerable pupils

- Individual transition plans will be in place for all pupils with EHCPs, all Looked After Children, and all pupils identified through the pastoral system as facing intersecting vulnerabilities (including young carers, EAL pupils, and pupils from socio-economically disadvantaged households) developed in partnership with families, Brighton and Hove Inclusion Support Service, the Schools Mental Health Service and the Virtual School Head
- Specific mitigation for pupil mental health and wellbeing: the school's pastoral team and the Schools Mental Health Service will provide additional transition support, including small-group sessions on managing change, for pupils identified as anxious about the move. Mental health and wellbeing will be a standing item for the Transition Working Group, and the post-transition equalities review (see below) will specifically consider attendance and wellbeing data to identify any pupils who may need additional support following the move.
- The SEN base and associated sensory spaces on the Nevill Campus will be agreed and reviewed against the needs of the current SEND cohort.
- Operational arrangements for Years 7 and 8 are being planned in the consolidated site and will be confirmed and communicated to parents of all current and incoming pupils.
- Responsibility and timeframe: development and delivery of individual transition plans will be led by the school's pastoral team and SENCo, with oversight from the Transition Working Group reporting to the Hove Park Programme Board. Transition plans for pupils joining in September 2027 (currently Year 5) will be put in place during the 2026/27 academic year, and plans for all other affected pupils will be completed no later than the summer term 2028, ahead of the move to the Nevill Campus in September 2028.

2. Travel, communications and accessible engagement

- A Travel Plan will be in place which will consider bus arrangements, walking and cycling infrastructure and information on home-to-school transport entitlement with specific outreach to families known to be on low incomes or in temporary accommodation
- All major communications about the consolidation will be provided in plain English and translated on request. They will also be made available digitally and in paper and reinforced, where required, in in-person events and 1:1 discussions. This will ensure that families facing language, digital or other access barriers are not disadvantaged.

3. Staff Equalities Review and post-transition Review

- If any staff restructuring is confirmed then staff with protected characteristics will be prioritised.
- The school will carry out a post transition equalities review focussing on attendance, well-being and progress of pupils with SEND, Looked After Children, Pupil Premium pupils and other groups identified.

Which action plans will the identified actions be transferred to?

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

Actions in this EIA will be transferred to the Hove Park Programme Board action log, the School Organisation Service Plan, and the Directorate Fair and Inclusive Action Plan (FIAP) for monitoring. Progress will be reported to the relevant Head of Service quarterly and to the EDI Team as part of FIAP performance reporting and auditing. The EDI Team will be notified and this EIA will be logged on the Directorate EIA Tracker.

8. Outcome of your assessment

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

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

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

The proposed consolidation of Hove Park School onto the Nevill Campus will have disproportionate impacts on a number of groups.

The Council has had careful regard to the response from the second public consultation, in which 63% of respondents to Q1 did not support the consolidation. The substance of the concerns expressed — particularly on SEND provision, the transition from primary, travel and road safety, residential amenity, the position of the 3G pitch, and the call for more detailed assessments before any decision is taken — has been considered in framing the impact assessment and the mitigation programme in this EIA.

These impacts have been weighed against the substantial educational, pastoral and financial case for consolidation. The proposal is intended to secure the long-term sustainability of Hove Park School, to maintain and enhance the quality of education available to pupils, to improve the physical environment in which pupils with SEND are taught, and to enable the Council to make best use of its school estate.

Each of the impacts identified is capable of substantial mitigation through the SMART actions set out above. A number of matters raised in consultation (notably the position of the 3G pitch, the detail of transport, noise and light assessments, and any subsequent decision on the Valley Campus) will properly be determined through later processes, including the planning process, on which separate engagement will be undertaken.

The decision to proceed is therefore considered proportionate to the legitimate aim of securing a financially sustainable, high-quality secondary school operating from a single fit-for-purpose site. The Council is committed to the mitigating actions set out in this EIA and to reviewing their effectiveness through the Programme Board and the post-transition review.

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

The Equality Impact Assessment for the proposed consolidation of Hove Park School onto the Nevill Campus has identified disproportionate impacts on a number of groups.

The Council has had careful regard to the second public consultation, in which 109 written responses were received and 63% of respondents to Q1 did not support the proposal. Concerns raised through consultation — particularly on SEND provision, transition arrangements for younger pupils, travel and road safety, residential amenity, the position of the proposed 3G pitch, and the call for more detailed planning-related assessments — have informed the impact analysis and the SMART mitigation programme set out in Sections 6 and 7 of this EIA.

The Council considers that the impacts identified, while real, are capable of substantial mitigation through the programme of transition support, SEN design, travel planning, communications and post-transition review set out in this EIA. The Hove Park Programme Board will provide oversight of the implementation of these mitigations. Matters that fall properly to be determined through the planning process (including the position of the 3G pitch and detailed noise, light and transport assessments) will be addressed through that route, with separate community engagement.

The proposal is considered proportionate to the objective of securing the long-term educational and financial sustainability of Hove Park School and making best use of the Council's school estate. The disposal of the Valley Campus on the recommended basis (Option C) realises a capital receipt to fund the works at the Nevill Campus while retaining the cricket pitches for ongoing community benefit.

Members are asked to have due regard to the equality impacts identified in this assessment, to the balance of opinion expressed through consultation, and to the mitigating actions proposed, when reaching their decision.

9. Publication

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

10. Directorate and Service Approval

Signatory:	Name and Job Title:	Date: DD-MMM-YY
Responsible Lead Officer:	Richard Barker, Head of Education	29.6.26
Accountable Manager:	Georgina Clarke-Green, Director of Education and Learning	7.7.2026

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

EDI Review, Actions, and Approval:

Equality Impact Assessment sign-off

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

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

Signatory:	Name:	Date: DD-MMM-YY
EDI Business Partner:	Ololade Ajagun	23-June-2026
EDI Manager:		

Notes and recommendations from EDI Business Partner reviewing this assessment:

The outcome of the Statutory Representation Period under Section 4 of this document should be included once the period has closed.

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

Statutory Notice – Proposal to discontinue the Hove Park School Valley Campus site, Hove and consolidate the school on the Nevill Campus site

Notice is given in accordance with section 19(2) of the Education and Inspections Act 2006 (as amended) and the School Organisation (Prescribed Alterations to Maintained Schools) (England) Regulations 2013 that Brighton & Hove City Council, Hove Town Hall, Norton Road, Hove, East Sussex BN3 3BQ, proposes to make a prescribed alteration to Hove Park School (a maintained secondary school).

The proposal is to discontinue the use of the Valley Campus, Hangleton Way, Hove, East Sussex BN3 8AA, as an additional site of Hove Park School with effect from 31 August 2028, and to consolidate all provision onto a single site at the Nevill Campus, Nevill Road, Hove, East Sussex BN3 7BN, with effect from 1 September 2028.

Hove Park School currently provides education for pupils aged 11 to 18 across two sites. As of January 2025, the school operates with a published admission number of 180 pupils per year group. Pupils in Years 7 and 8 are currently educated at the Valley Campus, and pupils in Years 9 to 13 at the Nevill Campus.

If the proposal is approved, all pupils attending the Valley Campus, and all pupils offered a place at that site, will be accommodated at the Nevill Campus site at Nevill Road, Hove, East Sussex, BN3 7BN from 1 September 2028.

This notice is an extract from the full statutory proposal. Copies of the full proposal, which contains detailed information about the proposal, can be obtained from:

School Organisation Team, Brighton & Hove City Council, Hove Town Hall, Norton Road, Hove, East Sussex BN3 3BQ, or by email at educationandlearning@brighton-hove.gov.uk.

The full proposal is also available on Brighton & Hove City Council's website and on Hove Park School's website: www.hovepark.org.uk.

Within four weeks from the date of publication of this notice, any person may object to or make comments on the proposal. The closing date for representations is 5:00pm on 6 July 2026.

Representations can be made:

- via the Council's online consultation portal
- by email to: educationandlearning@brighton-hove.gov.uk
- in writing to: School Organisation Team, Brighton & Hove City Council, Hove Town Hall, Norton Road, Hove, East Sussex BN3 3BQ

All responses must be received by the closing date stated above.

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

Publication date: 8 June 2026

Full proposal to discontinue use of the Valley Campus - Hove Park School and Sixth Form (referred to in the consultation as Hove Park School)

In accordance with section 19(1) of the Education and Inspections Act 2006, Brighton & Hove City Council proposes to make a prescribed alteration to Hove Park School by discontinuing the use of the Valley Campus as an additional site of the school and consolidating all provision onto one site at the Nevill Campus with effect from 1 September 2028.

Contact details

The name and contact address of the local authority publishing the proposals:

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

The name, address and category of the school it is proposed should be reorganised:

Hove Park School
Nevill Campus: Nevill Road, Hove, East Sussex, BN3 7BN
Valley Campus: Hangleton Way, Hove, East Sussex, BN3 8AA
Category: Community School (11-18 Mixed Comprehensive)

Implementation

It is proposed that the consolidation will be implemented on 1 September 2028. The reorganisation will be implemented in a single phase, with all students and operations moving to the Nevill Campus from that date.

All registered pupils at the school at the date of implementation, and all pupils offered a place prior to that date, will continue to be provided with education at Hove Park School on the Nevill Campus.

Affected pupils: Only students who started Year 7 in September 2027 will be directly affected by this change. These students will move to the Nevill Campus for Year 8 in September 2028, one year earlier than would have occurred under the current two-site system.

Reason for reorganisation

Brighton & Hove is experiencing declining school enrolment across the city, which has created significant challenges. School funding is directly linked to pupil numbers rather than providing a set amount per school, which has resulted in increasing budgetary pressures for Hove Park School. In response to these demographic changes, Hove Park School's maximum intake has previously been reduced from 300 to 180 students per year group.

The current two-site operation creates additional operational costs and complexity that are becoming increasingly difficult to sustain in the context of reduced funding. The consolidation will improve operational efficiency while maintaining the school's distinctive culture and educational quality.

The proposal also forms part of the local authority's duty to ensure sufficient, high-quality school places and the efficient use of resources across the area. Alternative options, including retaining the current two-site model and partial reconfiguration, have been

considered but are not considered sustainable in the medium to long term due to financial and operational constraints

School details and current arrangements

Hove Park School is an 11-18 mixed comprehensive community school serving students across Brighton & Hove. The school currently operates across two sites:

- **Valley Campus (Hangleton Way):** Currently serves Years 7-8 with capacity for approximately 360 students
- **Nevill Campus (Nevill Road):** Currently serves Years 9-13 with capacity for approximately 900 students

The distance between the two main entrances of the two school sites is 1.4 miles.

The school has a Published Admission Number (PAN) of 180 for Year 7 entry, reduced from previous higher levels due to declining demographics.

Current pupil numbers (2025-2026)

- Total school capacity: Approximately 1,260 students
- Current enrolment: 941 students
- Year 7 intake 2026: 138 students
- Students with Education, Health and Care Plans (EHCPs): 89 students (9.46% of students)
- Students on SEN Support: 234 students (24.9% of students)

Displaced pupils

No pupils will be displaced as a result of this proposal. All current students will continue their education at Hove Park School on the consolidated Nevill Campus.

Students affected by site change: Only the Year 7 cohort who started in September 2027 will experience a change to their expected progression. These students will move to the Nevill Campus in September 2028 (Year 8) instead of the originally planned September 2029 (Year 9).

Cullum Centre and SEND Provision

Hove Park School currently provides specialist SEND support at the Cullum Centre for students with autism and social communication difficulties. This provision will be fully maintained and enhanced at the consolidated Nevill Campus.

All existing SEND provision will be replicated at Nevill Campus. Specialist staff will transfer to maintain continuity of support, and additional resources will be provided to support transition for vulnerable students. Enhanced quiet spaces and sensory-friendly areas will be incorporated into the new design.

The local authority has considered the impact of the proposal on pupils with special educational needs and disabilities and is satisfied that appropriate arrangements will be in place to meet their needs in accordance with statutory duties.

Impact on staff

The consolidation of Hove Park School onto the Nevill Campus will have significant implications for all staff members, and it is recognised that staff opinion on the proposal is divided.

Currently, most of the teaching and support staff split their time between both campuses, with only two or three members of staff based permanently at Valley Campus. The consolidation will eliminate the need for staff to regularly commute between sites, which many have identified as both time-consuming and disruptive to their working day.

The consolidation will present opportunities for more effective team working as all staff will be based on a single campus which will create opportunities for improved collaboration that may currently be affected by the logistical challenges of operating two sites.

Staff relationships with students are expected to strengthen significantly and this will be particularly beneficial for staff with tutor responsibilities, who will be able to maintain greater continuity with their tutor groups enabling stronger pastoral relationships.

Impact on the community

Brighton & Hove City Council recognises that the consolidation of Hove Park School onto a single site will have significant impacts on the wider community beyond the school itself. The proposal will particularly affect families in the Portslade and West Hove areas who currently benefit from the proximity of Valley Campus, requiring them to make alternative travel arrangements and potentially increasing car journeys across the city.

There are legitimate concerns about increased traffic congestion around Nevill Road and the safety implications for pedestrians and cyclists during peak school hours. The change will also impact school choice for families in the western areas of Brighton & Hove, as it reduces the geographic spread of secondary school provision.

The Council acknowledges the concerns raised about the impact on families with children who have special educational needs, who may have specifically chosen Valley Campus for its smaller, more nurturing environment.

The local authority has had regard to the impact of the proposal on the community, including access to education, local infrastructure, and community use of the site, and is committed to working closely with stakeholders to mitigate adverse effects where reasonably practicable. This will include enhanced transport provision, traffic management measures, and ensuring that the consolidated school maintains the supportive environment valued by families. Professional support services will be made available to assist during the transition period, and the planning process will prioritise community concerns to ensure the final arrangements meet the needs of all stakeholders.

Sixth form provision

DfE records Hove Park School and Sixth Form Centre as an 11–18 establishment. Whilst the school remains formally designated as an 11–18 institution, the governing body suspended new Year 12 admissions from September 2023 in response to falling pupil numbers and financial pressures, and sixth form provision has not operated since, although the school has supported some specialist provision for pupils with Education Health and Care Plans in Year 12.

Travel

The local authority has considered the likely impact of the proposal on travel arrangements and accessibility. While some pupils may experience increased journey times, mitigation measures will include the development of a school travel plan, promotion of sustainable travel options, and engagement with transport providers where appropriate. **No changes to statutory home to school transport eligibility are proposed.**

Effect on other educational institutions within the area

Moving sites would have an effect on pupils from primary schools transitioning to Hove Park School, particularly for those from the western areas of Brighton & Hove.

- Primary school pupils from Portslade, Hangleton, and West Hove areas who could previously walk or cycle to Valley Campus would now face longer journeys to Nevill Campus.
- The loss of Valley Campus means incoming Year 7 students will immediately join a much larger school environment alongside students up to age 18, rather than the more gradual transition provided by the current two-site system.
- Primary school families in the western areas may reconsider Hove Park as their preferred secondary option due to travel difficulties, potentially leading them toward other schools or academy options like PACA. This could particularly affect families who specifically chose to live near Valley Campus for convenient secondary school access.
- Parents may have increased anxiety about their 11-year-olds traveling further distances and integrating immediately into a full secondary school environment with much older students, rather than the protected transition environment Valley Campus currently provides.

Consultation

An initial consultation on the proposal was carried out last year between 22 April and 3 June 2025. That consultation received 169 responses: 60% of respondents were opposed to the proposal, 22% were unsure and 18% were in support. A recurring theme in the feedback was a concern about the absence of preliminary drawings and design plans for the Nevill Road works, which made it difficult for respondents to assess the full implications of consolidation.

In response to this feedback, the Council paused the process and commissioned architectural designs for the Nevill Road Campus ahead of re-consulting.

A comprehensive consultation was conducted from 13 April to 25 May 2026 including:

Consultation events:

- Online meeting on 6 May 2026
- Face-to-face meetings at Valley Campus on 23 April and Nevill Campus on 27 April and 2026
- Online survey available throughout the consultation period

Results from consultation responses:

A total of 109 responses were received via the Your Voice portal (with a completion rate of 96.5%) and 2 email submissions. Respondents from the Your Voice survey were asked directly whether they supported the school's proposal to move from two sites to one at the Nevill Campus. Of the 108 who answered this question, 68 (63%) did not support the proposal, 31 (29%) were in support and 9 (8%) were not sure.

The consultation responses regarding Hove Park School's proposed consolidation reveal the following community concerns:

- Many families currently walking or cycling to the Valley campus would be forced to rely on public transport or car journeys, increasing travel costs and time while potentially reducing after-school activity participation.
- Environmental sustainability emerged as a key concern, with families who specifically moved near Valley campus to avoid car use now facing increased vehicle dependency.
- Traffic and safety concerns dominate responses, with serious worries about increased congestion on Nevill Road and parking problems creating road hazards.
- The educational benefits of the current two-site system are highly valued, particularly for students with Special Educational Needs. The Valley campus provides a smaller, nurturing environment for Years 7-8 transition students, and respondents fear losing this protective setting.
- Concerns include increased anxiety for SEN children and potential bullying risks when mixing younger students with sixth formers.
- Extensive infrastructure requirements include maintaining SEN provision (particularly the Cullum Centre), additional canteen and playground space, and organisational systems like staggered timetables and age-appropriate segregation.

Brighton & Hove City Council and Hove Park School are committed to maintaining educational quality by preserving and potentially enhancing the quality of education provided. They will preserve school culture by maintaining Hove Park School's distinctive ethos throughout the transition.

Adequate facilities will be ensured by providing all necessary facilities at Nevill Campus before implementation. SEND provision will be fully replicated and enhanced, including the Cullum Centre and SEND support services. Comprehensive transition support will be provided for affected students and families.

Traffic management measures will be implemented to address transportation and safety concerns. Community engagement will be maintained through transparent communication throughout the process.

Ownership of sites

- **Nevill Campus:** Owned by Brighton & Hove City Council
- **Valley Campus:** Owned by Brighton & Hove City Council

Future use of Valley Campus will be determined following the consolidation, a number of options are being assessed, ranging from full disposal of the site to partial disposal retaining certain land or facilities. Any disposal of land will be carried out in accordance with the relevant statutory requirements and guidance.

Where and when the Statutory Notice and Full Proposal Information will be available

Brighton and Hove City Council will publish the statutory notice for this proposal on Monday 8 June 2026. The notice will remain in force for a period of 4 weeks ie until Monday 6 July 2026. A copy of the statutory notice is provided alongside this document.

On 8 June 2026 the full proposal information will be sent to the following recipients:

- The Governing Board of the school
- The Diocese of Chichester

- The Diocese of Arundel and Brighton
- Leader of the Council
- Local Ward Councillors
- The Member of Parliament for Hove and Portslade
- The Governing Bodies of Blatchington Mill School, PACA and local Primary Schools in the area

It will also be published on Brighton and Hove City Council's website and the school website.

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

How to make representation or comment on the proposal

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

Following the closing date for representations, comments and objections, a report will be prepared for the Cabinet to consider and determine the proposal within 2 months of the end of the representation period, in accordance with statutory requirements. i.e. no later than 6 September 2026.

Support and further information

For further information about this proposal, please contact:

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

Appendix 5: Summary of Representations Received During the Statutory Notice Period

This appendix summarises the representations received in response to the statutory notice on the proposal to discontinue the use of the Valley Campus as an additional site of Hove Park School and consolidate all provision onto one site at the Nevill Campus with effect from 1 September 2028. A total of 17 representations were received in response to the statutory notice: 15 submitted through the online consultation portal, of which 14 included substantive written comments, and a further 3 received by email. In line with normal practice, individual responses have not been reproduced; instead, the representations have been analysed and grouped into the main themes raised, set out below.

Overall, the representations reflect a range of views on the principle of consolidation, with opposition to the proposal expressed more frequently than support. Some respondents supported bringing the school onto a single site, recognising the educational and financial rationale for doing so. However, the majority of responses raised concerns about the wider implications of the proposal, particularly for local residents living near the Nevill Campus and for the future capacity of the school.

Summary of Themes Raised

These themes will be considered alongside the educational, financial and operational reasons for the proposal.

Detailed matters such as final site layout, traffic management, construction impacts, lighting and noise mitigation, and community use of sports facilities will be considered separately through the planning process, including further engagement with affected neighbours on the siting of sports facilities where relevant.

1. Financial Implications and Value for Money

A number of respondents raised concerns regarding the financial impact of the proposal. Some felt that the school had already been financially disadvantaged by operating across two sites and were concerned that consolidation could bring further unfair financial impact if not carefully managed.

Others expressed concern about the capital cost of building new facilities at the Nevill Campus, and felt that the Council should avoid unnecessary borrowing or expenditure by making fuller use of existing facilities before constructing new ones.

A number of respondents also questioned whether consolidation would deliver the intended savings, noting that ongoing costs such as staffing, energy and maintenance would continue regardless of the number of sites, and that funding is linked to pupil numbers, which some felt could be put at risk by any reduction in overall capacity. One respondent argued that, if funding pressures were driven by pupil numbers, the Council should instead pursue measures to attract more pupils to the school rather than reducing capacity, which they felt would be counterproductive to that aim.

2. Land Use, Site Development and Loss of Green Space

Several respondents questioned the underlying rationale for the proposal, with some suggesting it was driven primarily by the disposal of the Valley Campus site for housing development and associated financial return, rather than by educational need.

Concerns were also raised about over-development of the Nevill Campus and the potential loss of green/playing field space, with a preference expressed for retaining existing open space and minimising new-build footprint.

A number of respondents linked this to anticipated population growth from nearby housing developments, arguing that the additional capacity provided by the Valley Campus site should not be given up given future demand in the area. Several referred to specific developments either under construction or planned in the vicinity, including at Sackville Estate, Hove Gardens, Toads Hole Valley, Lyon Close and Benfield/North of Hangleton Lane, and felt that falling birth rate projections did not adequately account for this anticipated growth in the school-age population. A small number of respondents also noted that, while pupil numbers can fluctuate over time, the loss of a school site would be permanent, and felt that any decision on this basis should therefore be delayed pending a fuller assessment of future demand.

3. Location and Impact of the New Sports Pitch(es)

This was the most frequently raised theme. Respondents living near the Nevill Campus raised concerns about the proposed position of the new all-weather (3G/4G) sports pitch, in particular its proximity to neighbouring residential boundaries and gardens. Concerns included potential noise and light pollution from floodlighting, use of the pitch outside school hours (including evenings, weekends and holidays), and a request that a noise and light pollution assessment be carried out and shared before a final decision on pitch location is made.

Several respondents asked to be involved in decisions on the final siting of the pitch, and suggested alternative locations further from residential boundaries (for example nearer the allotments or in the south-east corner of the site) to reduce impact on neighbours. One respondent referenced Sport England guidance on recommended separation distances between floodlit pitches and neighbouring properties, and felt the proposed location did not meet this; another stated that, under one of the draft layout options, floodlights would be sited less than five metres from the nearest residential property. A number of respondents suggested that development, including any 3G/4G pitch, would be better located towards the south-east corner of the site near the Old Shoreham Road/Nevill Road junction, making use of the existing netball courts and an associated access from Old Shoreham Road, so as to reduce disturbance to the rest of the school site and to neighbouring properties.

4. Traffic, Parking and Road Safety

Respondents raised concerns about existing traffic congestion and illegal or inconsiderate parking around the Nevill Road/Nevill Avenue area at school drop-off and pick-up times, noting that several schools already share this route.

There was concern that consolidating pupil numbers onto a single site, together with a new access point for Year 7 pupils, would increase congestion and safety risks on an already busy road, and that current parking restrictions are not well enforced. Some respondents also referred to existing pressure on Old Shoreham Road and the surrounding junctions, noting that four schools already share this general area, and cited additional local traffic generators including the introduction of the 3X bus route along Nevill Avenue and traffic associated with nearby retail premises.

Suggestions to mitigate traffic impacts included the introduction of speed humps on Nevill Avenue and landscaping improvements to the roundabout at Nevill Avenue/Nevill Road to discourage unsafe pedestrian crossing.

5. Consultation Process and Stakeholder Engagement

Some respondents felt that the concerns of local residents had not been sufficiently acknowledged in feedback on the consultation outcomes, and that the focus had been placed on educational and SEND considerations without addressing environmental and residential impact.

Concerns were also raised about the length of time available to comment, and a perception that many consultation responses opposing the proposal had not materially influenced the outcome. A small number of respondents stated their belief, based on their own reading of consultation responses, that a majority of respondents were opposed to the proposal, and felt that this should carry significant weight in the decision-making process; the specific figures quoted for the proportions opposed and in support varied between respondents.

6. Support for Consolidation in Principle

It should be noted that several respondents were supportive of the principal of consolidating the school onto a single site, and in some cases explicitly welcomed the benefits this could bring for pupils. Their representations focused on how specific elements of the scheme, particularly the sports pitch location and pedestrian crossing provision, should be implemented rather than opposing consolidation itself.

7. Educational Benefits of the Split-Site Model

A number of respondents, including parents of current pupils, valued the existing split-site arrangement and felt that a smaller campus setting benefited pupils who are anxious, vulnerable or neurodiverse, making it easier for them to access school than a larger, single combined site might allow. Concerns were also raised that consolidating pupil numbers onto one site would reduce the amount of outside space available per pupil, and that this should be weighed against the operational and financial case for consolidation.

Data from Oct 25 school census

Year of secondary entry

places
available

school Census by year in Oct 25							Estimated number going to CNCS	Estimated number going to King's	Average
R	1	2	3	4	5	6			
2032	2031	2030	2029	2028	2027	2026			

PACA catchment	220	216	190	256	222	238	221	262		
reduced by 2.46%		211	185	250	217	232	216	256		
adjusted for CNCS & Kings		173	147	212	179	194	178	218	25	13
Surplus/Shortfall of places		47	73	8	41	26	42	2		
Number of FSM eligible pupils		45	40	65	66	74	64	80		
% of pupils in catchment area eligible for FSM		21%	21%	25%	30%	31%	29%	31%		26%

Hove Park & Blatchington Mill catchment area	510	622	687	664	726	705	756	741		
reduced by 5.13%		590	652	630	689	669	717	703		
adjusted for CNCS & Kings		311	373	351	410	390	438	424	138	141
Surplus/Shortfall of places		199	137	159	100	120	72	86		
Number of FSM eligible pupils		64	114	110	172	155	178	171		
% of pupils in catchment area eligible for FSM		10%	17%	17%	24%	22%	24%	23%		19%

Stringer & Varndean catchment area	630	595	628	645	631	665	692	705		
reduced by 4.58%		568	599	615	602	635	660	673		
adjusted for CNCS & Kings		496	527	543	530	563	588	601	64	8
Surplus/Shortfall of places		134	103	87	100	67	42	29		
Number of FSM eligible pupils		96	156	194	188	205	219	209		
% of pupils in catchment area eligible for FSM		16%	25%	30%	30%	31%	32%	30%		27%

Longhill catchment area	210	219	282	258	280	298	283	301		
reduced by 23.89%		167	215	196	213	227	215	229	64	3
adjusted for CNCS & Kings		100	148	129	146	160	148	162		
Surplus/Shortfall of places		110	62	81	64	50	62	48		
Number of FSM eligible pupils		44	58	61	82	99	92	103		
% of pupils in catchment area eligible for FSM		20%	21%	24%	29%	33%	33%	34%		28%

BACA catchment area	180	141	160	135	151	179	175	168	27	2
reduced by 6.52%		132	150	126	141	167	164	157		
adjusted for CNCS & Kings		103	121	97	112	138	135	128		
Surplus/Shortfall of places		77	59	83	68	42	45	52		
Number of FSM eligible pupils		35	73	58	82	96	104	92		
% of pupils in catchment area eligible for FSM		25%	46%	43%	54%	54%	59%	55%		48%

Patcham catchment area	225	208	219	214	232	247	251	241		
reduced by 3.03%		202	212	208	225	240	243	234	37	3
adjusted for CNCS & Kings		162	172	168	185	200	203	194		
Surplus/Shortfall of places		63	53	57	40	25	22	31		
Number of FSM eligible pupils		21	33	23	52	56	42	54		
% of pupils in catchment area eligible for FSM		10%	15%	11%	22%	23%	17%	22%		17%

Total for catchment area Schools	1975	1344	1488	1500	1562	1644	1690	1726		
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Total for all Schools	2500	1869	2013	2025	2087	2169	2215	2251		
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Number of surplus places	631	487	475	413	331	285	249			
% of surplus places	25%	19%	19%	17%	13%	11%	10%			

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Cabinet

Agenda Item 29

Subject: Special Educational Needs and Disabilities (SEND)
Sufficiency Plan 2026-2029

Date of meeting: Thursday, 16 July 2026

Report of: Cabinet Member for Children, Families and Youth Services

Lead Officer: Corporate Director for Families, Children and Wellbeing

Contact Officer: Name: Rhianedd Hughes, Head of SEN Statutory Service

Email: Rhianedd.Hughes@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 Cabinet is asked to note the actions set out in the draft Brighton & Hove SEND Sufficiency Plan 2026–2029. The draft Plan sets out the city's ambition for ensuring sufficient and appropriate education places for children and young people with Special Educational Needs and Disabilities (SEND) over the next three years and identifies a programme of new and expanded provision to address known and projected gaps in capacity.
- 1.2 Demand for SEND places in Brighton & Hove has grown significantly over the past decade. In January 2026, 26.1% of pupils in the city (7,787) were identified as having SEND, compared with the national average of 20.8%. The number of children and young people with an Education, Health and Care Plan (EHCP) has risen to 3,193 as of January 2026 and is projected to reach 4,427 by 2032, an increase of 50% from the 2025 baseline. Autism and Social, Emotional and Mental Health (SEMH) needs are the largest and fastest growing categories of need.
- 1.3 Without further action, the Council will not be able to meet its statutory duties under Section 14 of the Education Act 1996 and Section 27 of the Children and Families Act 2014 to provide and keep under review sufficient appropriate school places for children with SEND residing in the local area.
- 1.4 The draft Plan responds to this challenge by setting out a phased programme of new resource bases, expanded targeted support in

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mainstream schools, and a refocusing of the city's specialist alternative provision.

- 1.5 The draft Plan aligns with Priority 2 (A fair and inclusive city) and Priority 3 (A healthy city where people thrive, and a better future for children and young people) of the Council Plan 2023–2027, and supports the Council's Principles of Belonging and the Ordinarily Available Inclusive Practice (OAIP) guidance launched in March 2026.

2. Recommendations

- 2.1 Cabinet agrees to note the programme of new and expanded specialist provision set out in the latest draft SEND Sufficiency Plan 2026-2029 (attached at Appendix 1).
- 2.2 Cabinet agrees the programme of new and expanded specialist provision set out in the draft SEND Sufficiency Plan 2026–2029 and detailed in Section 3 of the report.
- 2.3 Cabinet notes that individual provisions set out in the draft Plan which require statutory processes — including prescribed alterations under the Education and Inspections Act 2006 — will be subject to separate decisions and public consultation in due course, and that this report does not itself authorise any such alteration.

3. Context and background information

Strategic Context

- 3.1 Brighton & Hove City Council has a statutory duty to ensure sufficient school places for all children resident in the local area, including those with SEND. SEND sufficiency was identified as one of six key priorities in the SEND Strategy 2021–2026 and is a key area in the Local Authority SEND Reform Plan. A dedicated sufficiency plan is now required to guide the next three years of development and delivery.
- 3.2 The draft Plan has been developed in the context of national SEND reforms and the Schools White Paper “Every Child Achieving and Thriving” (2025). National policy is moving towards a more inclusive, locality-based model, with greater emphasis on early intervention, mainstream inclusion, and a graduated response to need. It reflects this direction of travel and is consistent with the Council's Principles of Belonging and the Ordinarily Available Inclusive Practice (OAIP) guidance which was launched in March 2026.
- 3.3 The draft Plan also aligns with Priority 2 (A fair and inclusive city) and Priority 3 (A healthy city where people thrive, and a better future for children and young people) of the Council Plan.

National Policy Context: Schools White Paper and SEND Reform Consultation

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- 3.4 The draft plan has been developed in the context of significant national SEND and Alternative Provision (AP) reform. Three documents together shape the direction of travel: the SEND and AP Improvement Plan (2023); the Schools White Paper 'Every Child Achieving and Thriving' (2025); and the parallel SEND Reform consultation 'Putting Children and Young People First' (2025). The two 2025 documents should be read together: they set out the most substantial redesign of the SEND system in over a decade.
- 3.5 The Schools White Paper and the SEND Reform consultation signal a sustained shift away from large standalone Pupil Referral Units and towards integrated, locality-based alternative provision; towards earlier and more effective inclusion in mainstream supported by a stronger network of specialist resource bases and inclusion units; and towards a national framework for identifying and meeting need. The key reform elements relevant to the Council's sufficiency planning include:
- Specialist Provision Packages – nationally defined, evidence-based support frameworks intended to replace the current individualised provision in EHCPs for children with the most complex needs, with the Council determining whether a package and a continued EHCP is required at phase transition points.
 - Inclusive Mainstream Fund – £1.6 billion over three years allocated to schools, colleges and early years settings to strengthen ordinarily available inclusive practice and early intervention.
 - SEND school groupings – within three years, all schools are expected to join SEND group structures, agree operating principles, and work with the Council and Integrated Care Board to develop a strategic plan for SEND.
 - National Capital investment of £3.7 billion to create new specialist places and inclusion bases nationally, with the Council expected to set out a clear local strategy in order to access funding.
- 3.6 The Council has already submitted its formal response to the SEND Reform consultation. This does not pre-empt the outcome of the consultation; it does, however, seek to position the city well to discharge those duties.
- 3.7 The direction of national policy is clear and consistent, the local demand pressures are immediate, and the lead times for new specialist resource bases, inclusion bases and specialist provision are significant (typically two to three years from approval to opening). Delay would risk the city falling behind the national reform trajectory and having to use higher-cost out-of-area placements. The draft Plan therefore aligns with the direction of national reform without pre-empting its detail and is intended to be sufficiently flexible to be refined as the national picture develops.

Current position and projected demand

- 3.8 As of January 2026, there were 29,847 pupils on roll across Brighton & Hove schools, of whom 1,907 held an EHCP. Brighton & Hove maintained 3,193 EHC Plans for children and young people aged 0–25 resident in the city.

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SEND prevalence in the city continues to rise: 6.4% of pupils have an EHC plan (compared to the national average of 6.0%) and 19.7% are receiving SEND Support (compared to the national average of 14.8%).

- 3.9 The number of children and young people with autism as a primary need has increased from just under 300 in January 2016 to over 2,400 in January 2026, a rise of around 700% over the decade. Those with SEMH as a primary need have grown from around 1,129 to over 1,816 over the same period, an increase of approximately 60%. Projections to 2032 suggest that the number of 0–25-year-olds with autism as a primary need will rise by a further 81%, and those with SEMH by a further 63%.
- 3.10 Demand for Early Years specialist places have also increased, but the number of Reception transfers to special schools have declined. This reflects a capacity pressure in local specialist provision not a reduction in demand, with the consequence that more children with complex needs are either being educated in mainstream or placed out of area.
- 3.11 Over the last three years, the use of independent and non-maintained special schools have remained broadly stable in volume terms, but the average cost of placements has risen, and the use of other local authority-maintained provision has increased. The total cost of out-of-city placements has risen by from £5.17m in 2022/23 to £5.82m in 2025/2026, an increase of £647k over the last four years.

Programme of new and expanded provision

- 3.12 The draft Plan sets out a programme of new and expanded SEND provision in the city over the period 2026–2029. The key proposals to which this report draws Cabinet's attention are summarised in the table below and described in more detail in the following paragraphs.

Provision	Phase / Type	Places	Planned opening
Stanford Primary School Specialist Base	Primary (KS2) – Autism	12-16	2027/28
Primary Inclusion Intervention Spaces (IIS)	Primary – Targeted Support	80 (additional 10 IISs)	2026/27
Secondary Specialist Base	Secondary – Autism	20	September 2027
Secondary Autism/SEMH Specialist Base	Secondary – Autism/SEMH	20	September 2028
Primary Specialist Support Bases (3)	Primary – Autism/SEMH	36–48	September 2028

Indicative costing summary

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- 3.13 The indicative full-year revenue costs of the proposed provision are summarised in the table below and set out in full in the Estimated Costing Table at Appendix 2. The figures are estimates for planning purposes; they represent full-year running costs once each provision is fully operational, with part-year costs applying in the year a provision opens. Costs are met from the High Needs Block of the Dedicated Schools Grant. The formal financial implications are set out in section 6 below.

Provision	Places	Est. annual cost (£000)
Priority 1: Expand neurodiversity provision in mainstream		
Moulsecoomb Primary (The Roost) Specialist Base – Phase 1	8	157
Moulsecoomb Primary Specialist Base – Phase 2	8	157
Stanford Primary Autism Specialist Base	12–16	275
Secondary Autism Specialist Base	20	393
Secondary Autism/SEMH Specialist Base	20	393
Priority 2: Strengthen SEMH provision		
Year 8 SEMH places	12	315
Specialist Year 9 SEMH places	12	315
Priority 3: Develop specialist autism/SEMH provision		
Primary Specialist Bases (3 units)	36–48	704
Priority 4: Strengthen early years & primary specialist provision		
Early years/primary support bases (2 units)	24	471
Priority 5: Address post-16 provision gaps		
Supported internships	20	300
Total estimated annual cost		3,483

Note: figures are indicative planning estimates and will be refined for each provision as scheme design and site confirmation progress, and through its individual statutory process. They exclude the further expansion of Inclusion Intervention Spaces, which is funded separately.

Additional secondary specialist bases

- 3.14 The draft Plan provides two further secondary specialist bases, each with capacity for 20 places. A secondary Autism specialist base is proposed to open in September 2027, and a secondary Autism/SEMH specialist base is proposed to open in September 2028. These provisions will significantly strengthen specialist autism and SEMH capacity at the secondary phase, in direct response to the projected growth in demand set out earlier in this report.

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Primary specialist support bases (autism and SEMH)

- 3.15 The draft Plan also provides three new primary specialist support bases for children with autism and SEMH, each offering between 12 and 16 places (36–48 places in total), with a target opening of September 2028. These bases will be established in mainstream primary schools and will include assessment places and outreach to build inclusive practice across the wider primary estate. They are intended to provide a specialist primary offer for children with autism and SEMH closer to home, reducing the use of out-of-area and higher-cost placements.
- 3.16 As with the Autism Resource Units, each of the secondary resource provisions and the three primary specialist support bases will require its own statutory process under the Education and Inspections Act 2006, including formal public consultation, statutory notice and decision-making by the relevant committee, and the sites for individual provisions will be confirmed through those processes.

Inclusion Intervention Spaces (IIS) – further expansion

- 3.17 Inclusion Intervention Spaces (IIS) are a tier 1 targeted support provision developed in primary schools to support children whose needs cannot be fully met through universal classroom provision alone. The IIS pilot launched in 5 primary schools in September 2024, and Phase 2 commenced during 2025/26 with 8 schools.
- 3.18 The draft Plan proposes a further expansion of the IIS programme during 2026/27, with an additional 10 IISs to be commissioned across the primary schools. This will bring forward Tier 1 capacity earlier than originally planned, in response to continued growth in demand and to support the broader objective of reducing reliance on specialist provision.

Central Hub Brighton (CHB) – leadership transition and provision changes

- 3.19 The Central Hub Brighton (CHB) is the city's specialist alternative provision for children and young people with SEMH needs. The draft Plan reflects the changes underway at CHB to align it with the direction of national SEND and AP reform, which is moving away from large standalone Pupil Referral Units and towards more integrated, locally rooted models in which PRUs and specialist settings provide targeted support within a wider inclusion system.
- 3.20 As part of this work, a new model of leadership will be put into place, to shape the future of the provision in the context of the wider sector change. The model comprises two complementary, fixed-term roles: a Lead Strategic Education Consultant: a serving Headteacher within the city's education and learning community, spanning the both Tier 2 (preventative, outreach and school-based support) and Tier 3 (specialist statutory alternative provision) and a Headteacher who will provide day-to-day operational leadership with responsibility for educational leadership, safeguarding and staff management.
- 3.21 The Treehouse (Primary) provision will continue, with educational support to primary-aged learners delivered from a base at Fairlight Primary School.

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The Connected Hub (Year 11) will also continue through 2026/2027 with a detailed options appraisal on future arrangements being considered by the Secondary School Partnership.

Statutory and Consultation Framework

- 3.22 The draft SEND Sufficiency Plan is not itself a statutory document, but it sets out the Council's approach to discharging its statutory duty and informs the prioritisation and sequencing of individual provision proposals which will themselves be subject to statutory processes.
- 3.23 The specialist bases proposals set out in the draft Plan will require its own statutory process under the Education and Inspections Act 2006 and the School Organisation (Establishment and Discontinuance of Schools) Regulations 2013, including formal public consultation, statutory notice and decision-making by the relevant committee. Cabinet is asked to note that the draft Plan as a strategic document does not, of itself, authorise any individual prescribed alteration; those decisions will be brought forward separately.

4. Analysis and consideration of alternative options

- 4.1 An option of not bringing forward a SEND Sufficiency Plan has been considered and rejected. SEND sufficiency was identified as one of six key priorities in the SEND Strategy 2021–2026, and a dedicated plan is now required to guide the next three years of development and delivery. Without a published Plan, the Council would be unable to demonstrate a coherent strategic approach to discharging its statutory duty, and the prioritisation and sequencing of individual provision proposals would not be transparent to families, schools or partners.
- 4.2 An option of relying on placements in independent and non-maintained special schools, and in other local authority-maintained provision, to meet projected demand has been considered and rejected. The total cost of out-of-city placements has risen from £5.17m in 2022/23 to £5.82m in 2025/2026, an increase of £647k despite placement numbers remaining broadly stable. The Council's High Needs Block (HNB) cannot sustain a continued shift towards higher-cost provision. The provision set out in the draft Plan is intended to enable more children and young people to be educated as close to home as possible, in line with the SEND Code of Practice and the Principles of Belonging, while making more effective use of the HNB.
- 4.3 An option of pausing the development of the draft Plan until there is greater certainty over the outcome of the Schools White Paper and the SEND Reform consultation has been considered and rejected. The direction of national policy is clear and consistent; the local demand pressures are immediate and continuing to grow, and the lead times for new resource bases and specialist provision are significant. A pause would risk the city falling behind the national reform trajectory and continuing to rely on higher-cost out-of-area placements. The draft Plan has been designed to align with

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the direction of reform without pre-empting its detail, and to remain sufficiently flexible to be refined as the national picture develops.

5. Community engagement and consultation

- 5.1 The draft Plan has been developed through the SEN Sufficiency Workstream, which was revised in January 2025 in line with the Education and Learning Directorate's workstream agreements with schools. The workstream comprises of Senior Council Officers, Alternative Provision Leaders, Brighton & Hove Inclusion Support Service, Primary, Secondary and Special School Leaders, Early Years Specialist Nursery, Parent Carer Council (PaCC) who have supported the development of the draft Plan throughout.
- 5.2 A full data refresh has been undertaken to ensure that proposed developments are informed by the most recent picture of need, and that the Council is neither under-providing nor over-providing for any type of SEND need.
- 5.3 Engagement through the SEN Sufficiency Workstream has directly shaped the priorities and sequencing of provision in the draft Plan. Feedback from school and provision leaders informed the prioritisation of secondary autism capacity and primary-phase specialist support, and input from the Parent Carer Council (PaCC) shaped the emphasis on local provision, reduced travel distances and earlier intervention. As active participants in the development of the Plan, Workstream members are committed to its delivery and will continue to be engaged as individual provisions are brought forward.

6. Financial implications

- 6.1 In line with the government's SEN reform plans, the council is planning to significantly increase investment in expanding local mainstream provision.
- 6.2 The details of the programme of planned new provision are provided in section 3.13 of the report with indicative costings shown in 3.14. This has been incorporated into the council's SEND Reform Plan that will be submitted to the government in June. The proposed expansion is over a multi-year period, and the indicative costs shown represent a full annual cost once all new provisions are in place. The total is estimated at £3.483m and will be a cost to the High Needs Block of the Dedicated Schools Grant. For context, the 2026/27 High Needs Block allocation made to Brighton and Hove by government is £43.481m.
- 6.3 Future projections show that the High Needs Block will move into a significant deficit position in 2026/27 (c. £7m in-year deficit) and 2027/28 (c. £11m in-year deficit). In the longer term, the investment in early intervention and mainstream inclusion is expected to reduce the need for more expensive high-cost placements which will mitigate the impact of the planned investment and reduce the size of the deficits.

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- 6.4 In February 2026, the Government announced that as part of the wider SEND system reform they will introduce a High Needs Stability Grant in 2026/27. This grant, subject to compliance with certain conditions, is expected to mean that 90% of the council's cumulative high needs deficit as at 31/03/2026 will be funded by the government. The deficit in Brighton and Hove at the end of the 2025/26 financial year was £1.762m. Allocations of the High Needs Stability Grant will only be paid once a local authority has developed and submitted to the Department for Education for a Local SEND reform plan which is then approved as meeting the required criteria. At this stage it is not clear what arrangements Government will put in place for central DSG deficits (primarily high needs related) arising in 2026/27 and 2027/28 but, from 2028/29, assuming compliance with the SEND reforms, the expectation is that any deficits will be managed by central Government.
- 6.5 The capital expenditure for the SEND reform programme is forecasted to spend approximately £8.2m between 2026/27 and 2028/29. This will be funded from the £3.7 billion national investment that the government is making to facilitate the creation of new specialist places and inclusion bases. The Council is expected to set out a clear local strategy in order to access funding.

Name of finance officer consulted: Steve Williams Date consulted: 29/05/26

7. Legal implications

- 7.1 Under the Children and Families Act 2014, Local Authorities have a statutory duty to identify, assess, and ensure sufficient provision for children with Special Educational Needs and Disabilities ("SEND"). As detailed in paragraph 3.25 of this report, the draft SEND Sufficiency Plan is not itself a statutory document, but it sets out the Council's proposed approach to discharging this statutory duty. The Education and Inspections Act 2006 and the School Organisation (Establishment and Discontinuance of Schools) Regulations 2013, require a number of statutory steps to be taken for some of the proposed individual provisions that underpin the draft plan, including formal public consultation, statutory notice and decision-making by the relevant body. Per paragraph 3.26 the draft Plan is a strategic document that does not, of itself, authorise any alteration to or new provision within existing schools; relevant reports seeking those decisions following the applicable statutory steps will need to be presented separately.

Name of lawyer consulted: Sandra O'Brien Date consulted: 17 June 2026

8. Equalities implications

- 8.1 The draft Plan is expected to have a positive equalities impact overall, by enabling more children and young people with SEND to access appropriate provision close to home, by reducing reliance special school and out-of-area placements, and by making explicit the Council's commitments under the Principles of Belonging and the OAIP guidance.

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- 8.2 The Council has given particular attention during the consultation to ensure that the views of children and young people with SEND, their families, and those with other protected characteristics are heard. Accessible formats and targeted engagement have been offered, working closely with the Parent Carer Council (PaCC), Amaze, the SEND Youth Forum, and other recognised representative groups.
- 8.3 The full Equalities Impact Assessment (EIA) is attached at Appendix 2. Key findings include: children with autism and SEMH needs, who are disproportionately male, stand to benefit most directly from the proposed new provision.
- 8.4 The EIA also identifies the intersectional disadvantages faced by children with SEND who are also eligible for free school meals, looked after, or from Black, Asian and Minority Ethnic backgrounds, who are more likely to experience delays in identification and assessment, and less likely to access local specialist provision.
- 8.5 The draft Plan's emphasis on early intervention, mainstream inclusion, and local specialist bases is intended to support more equitable access across these groups. The Council will monitor outcomes disaggregated by protected characteristic as provisions open and will report progress through the SEND Local Area Partnership Board

9. Sustainability implications

- 9.1 By increasing the availability of local specialist base provision, the draft plan is expected to reduce the number of children and young people travelling significant distances to access education, and so to support the Council's wider commitments under the Local Transport Plan and the city's climate change strategy.
- 9.2 The Council's Home to School Transport Policy prioritises sustainable travel through walking, cycling and public transport where journeys are reasonable and will continue to apply in respect of provision delivered through the draft Plan.

10. Conclusion

- 10.1 Demand for SEND provision in Brighton & Hove has grown significantly over the past decade and is projected to continue to grow. Without a clear sufficiency plan, the Council will not be able to meet its statutory duty to provide sufficient school places for children with SEND.
- 10.2 At the same time, the Schools White Paper 'Every Child Achieving and Thriving' and the SEND Reform consultation 'Putting Children and Young People First' set out the most substantial redesign of the SEND system in over a decade. While both remain at consultation stage, the direction of travel is clear and the lead times for new specialist bases are significant. The draft Plan has been designed to align with the direction of national reform without pre-empting its detail, and to position the city well to

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discharge whatever duties emerge as the reforms move into legislation and implementation.

Supporting Documentation

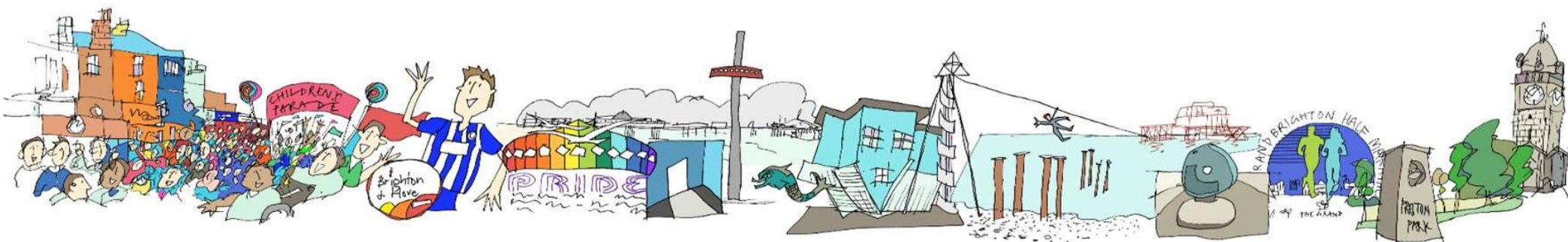
1. Appendices

Appendix 1: Draft SEND Sufficiency Plan 2026-2029

Appendix 2: Equalities Impact Assessment

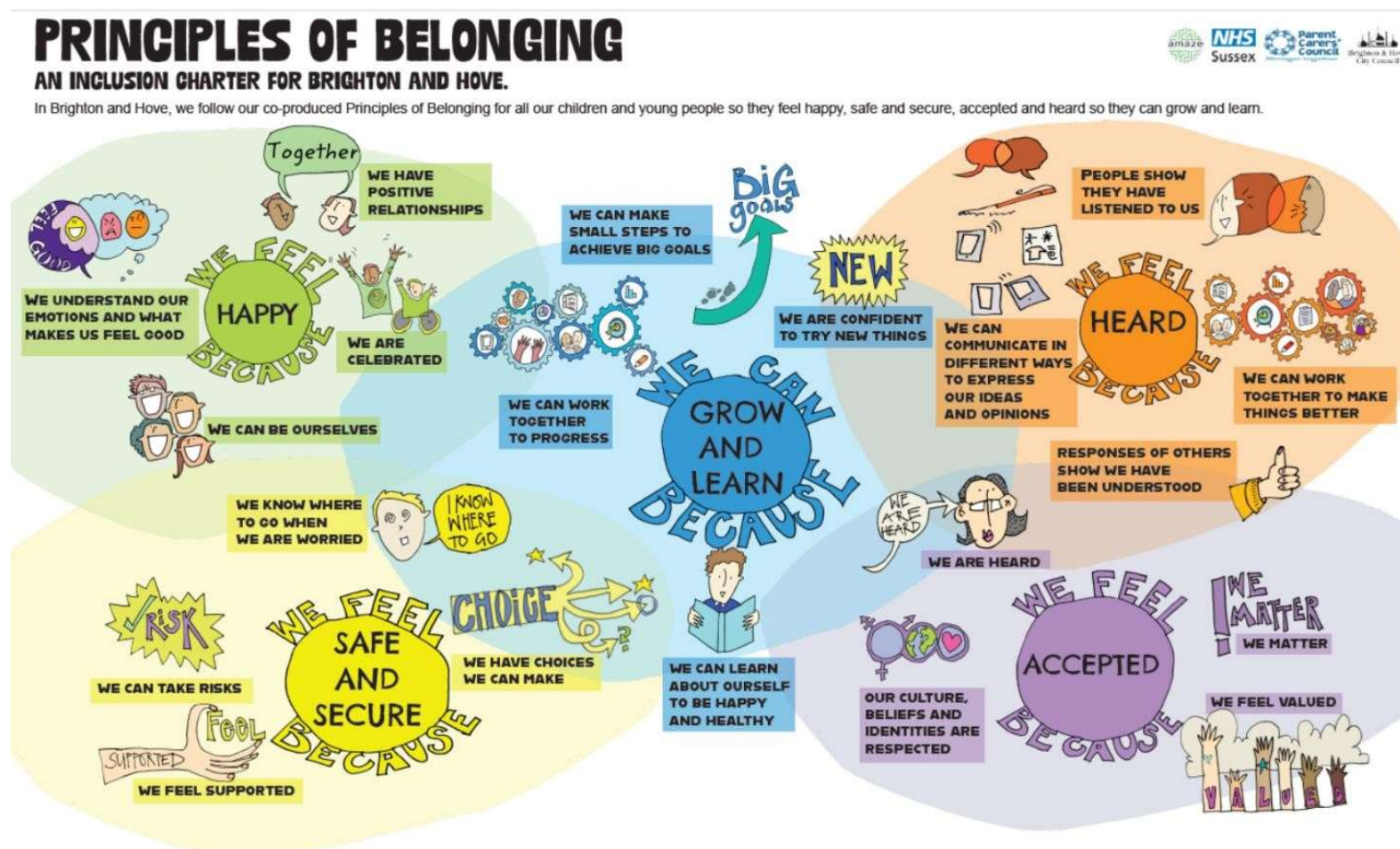
SEND Sufficiency Plan 2026-202G for children and young people with Special Educational Needs and Disabilities (Draft V7.3)

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Introduction

Brighton and Hove aims to be an inclusive city for all children and young people. The Principles of Belonging were developed to support our children as they learn and grow to feel happy, safe, secure, heard and accepted. At the heart of these principles is a culture in which we embrace difference, barriers are minimised or removed, and in which the every-day lived experience, interests and needs of children and young people are better understood. That culture of inclusion in our schools is everybody's responsibility so that children and young people can be educated as close to home as possible and make progress. This plan is about the more specialist educational provision in our city, but it is based on the foundation of supporting children as early as possible to succeed and grow well. You will find reference to the graduated response and how the tiers of support work together to meet our children and young people's needs. For those who do need a more specialised response we want to provide high quality, local provision whenever possible.



This Sufficiency Plan sets out our future placement intentions and will serve as the foundation for ongoing engagement with education providers, children and young people, and their families.

Legal Duty and Strategic Context

Brighton C Hove City Council has a statutory duty under Section 14 of the Education Act 1996 to ensure sufficient school places for all children residing in the local area, including those with Special Educational Needs and Disabilities (SEND).

Over the past decade, demand for SEND places in the city has increased significantly. There is now a clear and pressing need to expand both specialist provision and mainstream resource bases to ensure that children and young people have access to the right type of support — both now and in the future.

SEND sufficiency was identified as one of six key priorities in the SEND Strategy 2021–2026. While progress has been made against several of the strategy’s actions, a dedicated sufficiency plan is now required to guide the next three years of development and delivery.

This plan outlines:

- The current landscape of SEND provision
- Forecasted demand for future places
- Identified gaps in provision
- Current projects and future plans to secure additional capacity

It aligns with Priority 2 (A fair and inclusive city) and Priority 3 (A healthy city where people thrive and a better future for children and young people) of the Council Plan. It supports all the Council’s five organisational pillars but in particular: Innovation and Creativity, and Diversity and Inclusion, as part of our commitment to becoming a learning organisation



Be confident



Be connected



**Be innovative
and creative**



**Be diverse
and inclusive**



**Be healthy and
psychologically safe**

The plan will be monitored termly and updated to take account of progress and delivery through the SEND and AP Partnership Board.

Current Position in Brighton s Hove

As of January 2026, there were 29,847 pupils on roll across Brighton C Hove schools, with 1,907 children holding an Education, Health and Care Plan (EHCP). Brighton and Hove maintained 3,193 EHC Plans for children and young people (0-25) resident in the city.

SEND prevalence in the city continues to rise. In January 2026, 26.1% of pupils (7,787) were identified as having SEND which is significantly above the national average of 20.8%. This represents an increase of 524 pupils compared to January 2025, despite an overall decline in the total pupil population.



KEY POINTS

- 6.4% of pupils in Brighton & Hove schools have an EHC plan, which is in line with the national average (6.0%)
- 19.7% of Brighton & Hove pupils are receiving SEND Support compared to the national average of 14.8%
- EHCP numbers have increased by over 100% since 2018/19, rising from 1,486 to 3,193 maintained plans in 2026, with annual growth consistently between 10–13%
- Statistical neighbour average EHCP plan 5.33% SEND Support 12.67% as at January 2025

3193

THE NUMBER OF

EHCPs

IN BRIGHTON & HOVE



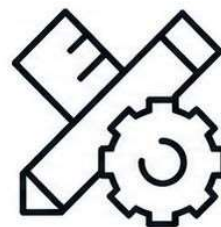
20.2%

PUPILS IN SPECIAL SCHOOLS



3.3%

ATTENDING
RESOURCED
PROVISIONS
AND
SEN UNITS



42.4%
IN MAINSTREAM
SCHOOLS
WITH AN
EHCP

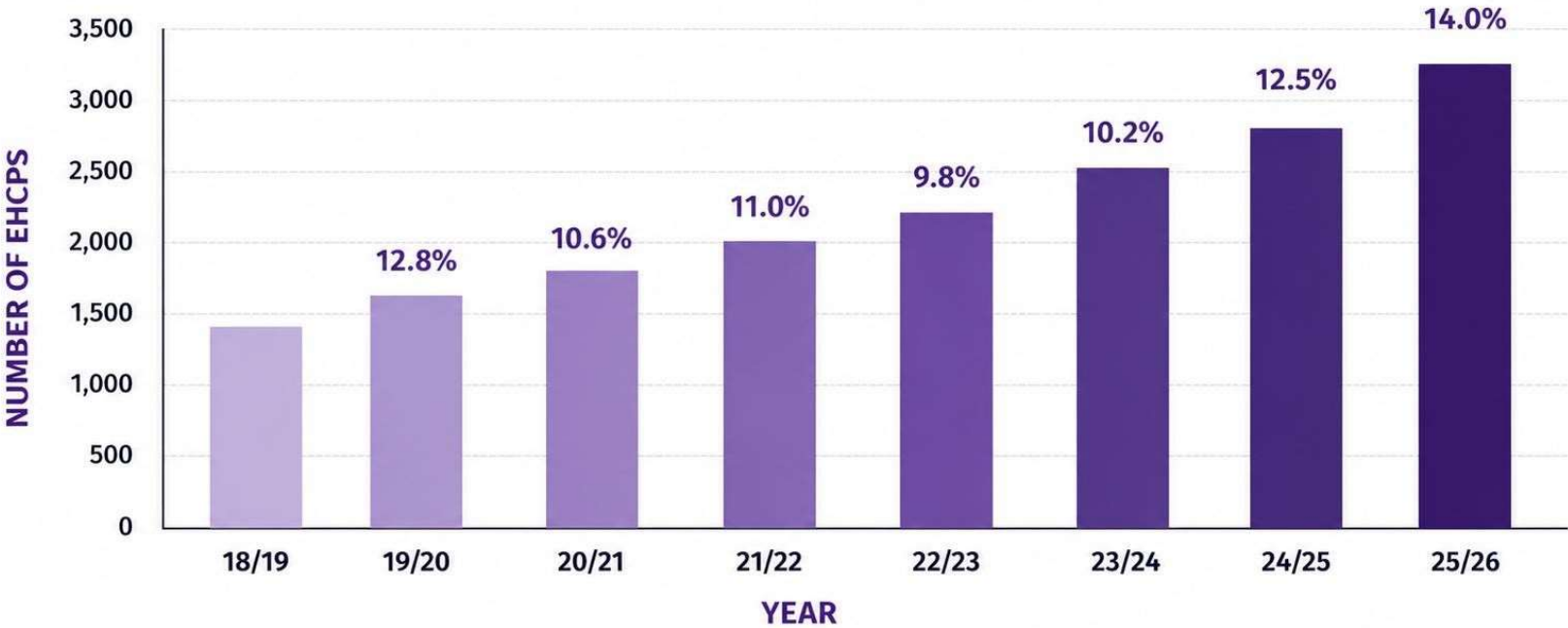


As at SEN2 January 2026 (0-25 pupil population) – This infographic shows the breakdown of EHC plans resident in the city.

Growth in EHC Plans

The city has seen a rise in EHC plans year on year. The graph below is based on the growth in EHC Plans in Brighton and Hove from 18/19 to 25/26 and the annual percentage rise each year. A steady increase in percentage of between 10-13% each year. The growth demonstrates a 57% increase in the last 5 years. In 2025-2026 the percentage increase has risen to 14%.

NUMBER OF EHCP PLANS MAINTAINED
BY BRIGHTON & HOVE (0-25)



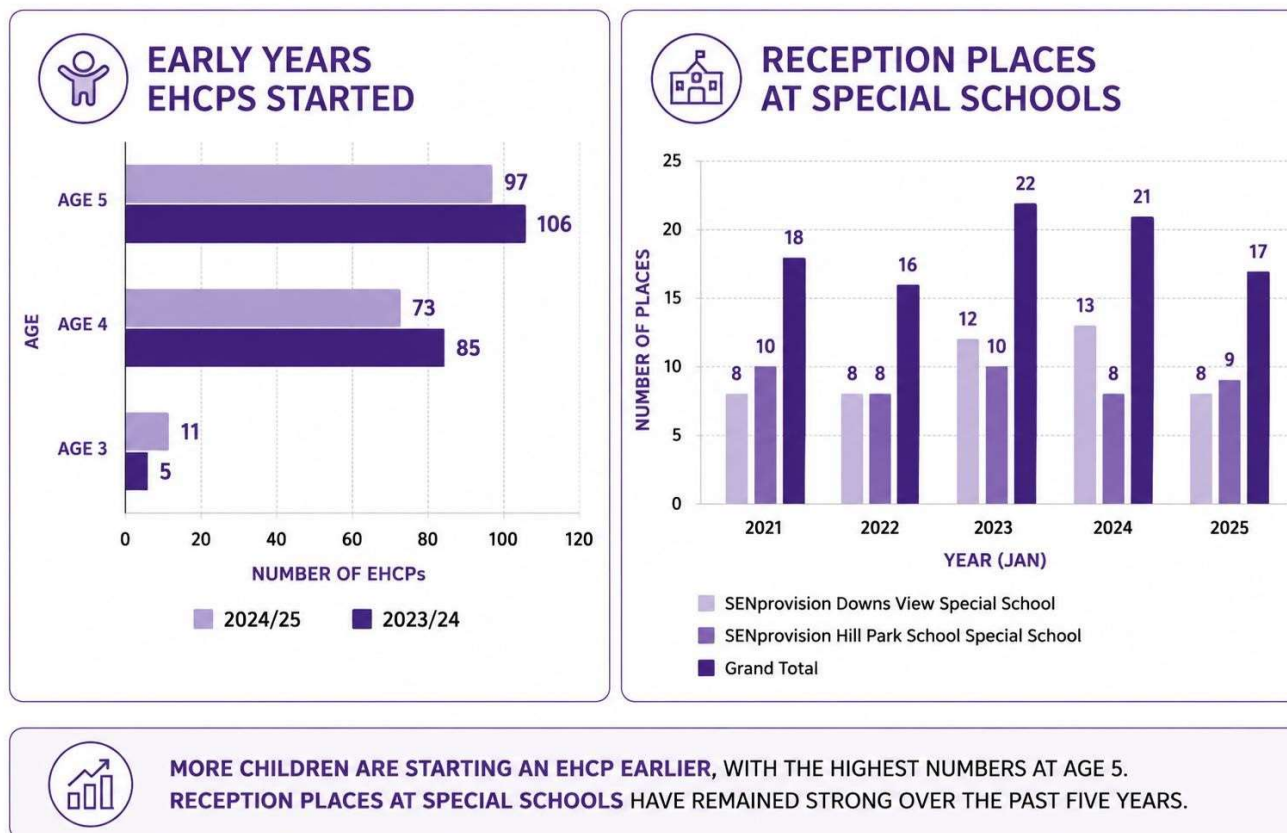
THE NUMBER OF EHCP PLANS HAS INCREASED EVERY YEAR OVER THE PAST EIGHT YEARS, RISING BY 14% IN 2025/26 TO OVER 3,100 PLANS.

Early Years

The number of plans for Early Years remains significant, with most plans starting when the child is age 5. 2024/25 shows a slight increase in plans initiated at age 3 for under 5's.

Fewer plans are recorded for children aged 5 at the time of the plan starting, but the overall trend suggests early identification and support is improving. Current data indicates that age 5 is the most common point for EHC plan initiation, highlighting the importance of early years intervention.

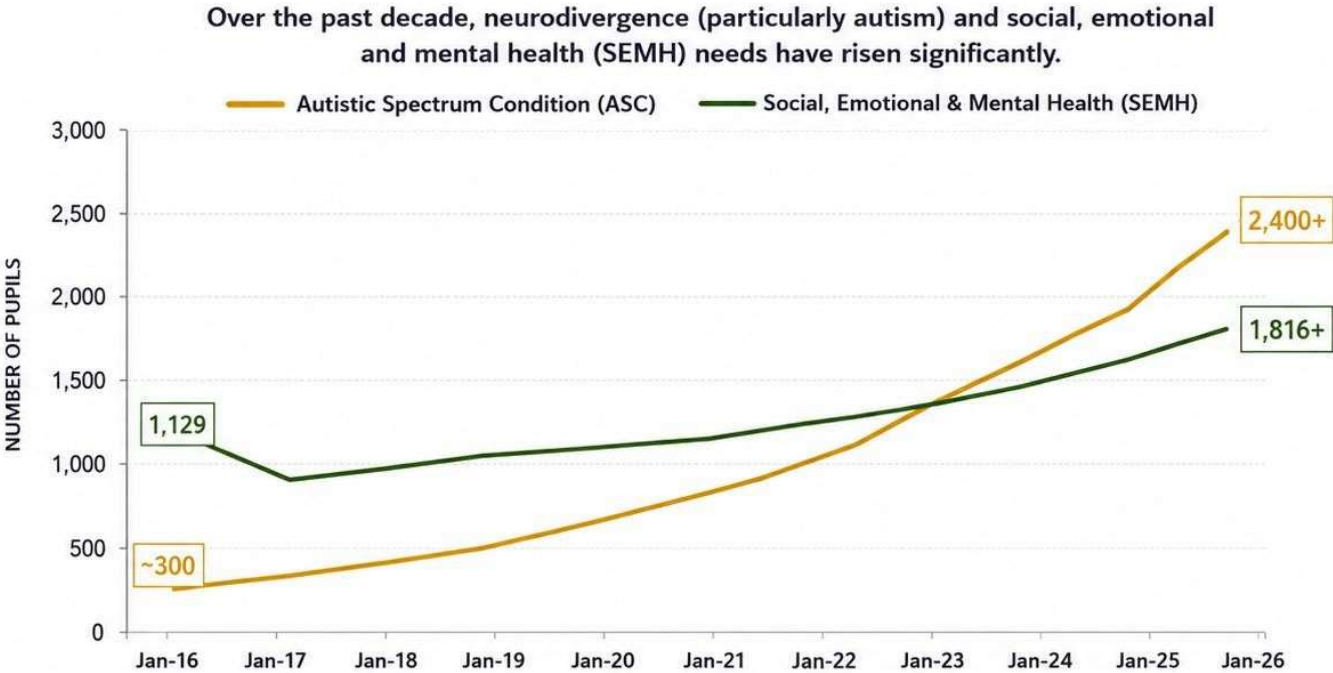
Early Years transfers to Special School Reception places have varied over time, peaking in 2023 (22 places) and then gradually declining to 17 places in 2025. The decline is due to lack of available spaces in specialist provision and not a reduction in demand, which has grown. The grand total shows a clear peak in 2023 (22 places), followed by a downward trend meaning more children with complex needs are either being educated in mainstream or out of area. This demonstrates a capacity pressure with local specialist provision that needs to be addressed.



School aged pupils with SEND

For pupils receiving SEND Support in schools, the most common primary need is Social, Emotional and Mental Health (SEMH). For pupils with an Education, Health and Care Plan, the predominant need is Autism. The largest proportion of EHC Plans are held by children and young people aged 11–15, aligning with national and statistical neighbour benchmarks.

BRIGHTON & HOVE ALL SEND PRIMARY NEED TREND
Jan 2016 – Jan 2026



 With the exception of speech and language needs, all other need categories have remained stable or declined.

KEY TRENDS (2016 – 2026)



AUTISTIC SPECTRUM CONDITION (ASC)
2,400+ in Jan 2026
Just over 300 in Jan 2016
~700% INCREASE over the past decade



SOCIAL, EMOTIONAL & MENTAL HEALTH (SEMH)
1,816+ in Jan 2026
1,129 in Jan 2016
~60% INCREASE over the past decade

 The largest proportion of EHC Plans are held by children and young people aged 11–15.

 These trends highlight the need for a targeted focus on provision for SEMH and neurodivergence (particularly autism) across all age ranges and levels of need. This will be central to the city’s SEND sufficiency planning and commissioning priorities.

This table shows how the profile of need has evolved in the city schools over the past decade. This highlights significant increases in both the SEND support and EHC Plan cohorts.

SEN PRIMARY NEED – ALL SEN PUPILS	Jan-16	Jan-17	Jan-18	Jan-19	Jan-20	Jan-21	Jan-22	Jan-23	Jan-24	Jan-25	Jan-26
Autism	308	333	417	529	768	874	1,060	1,251	1,629	1,930	2,409
Social, Emotional & Mental Health	1,129	909	1,033	1,067	1,126	1,178	1,249	1,385	1,512	1,681	1,816
Speech, Language & Communication Needs	1,334	1,280	1,236	1,194	1,176	1,213	1,339	1,406	1,427	1,421	1,422
Specific Learning Difficulty	1,542	1,231	1,264	1,402	1,236	1,226	1,251	1,229	1,343	1,347	1,305
Moderate Learning Difficulty	809	681	593	583	596	579	553	538	421	382	366
Physical Disability	161	147	151	224	222	210	213	188	172	166	149
Hearing Impairment	117	115	114	97	104	96	97	109	105	106	124
Severe Learning Difficulty	164	172	167	180	145	156	142	133	109	99	95
Visual Impairment	54	47	50	52	55	58	66	65	59	61	45
Profound & Multiple Learning Difficulty	45	44	44	36	39	35	35	30	28	22	17
Other Difficulty/Disability	220	311	254	82	47	35	22	19	16	21	21
Multi-Sensory Impairment	7	10	15	17	23	21	30	27	24	17	16
Down Syndrome (New 2025)										10	21
No specialist assessment of need	266	161	94	8	1	2	4	0	0	0	0
TOTAL	6,156	5,441	5,432	5,471	5,538	5,683	6,061	6,380	6,845	7,263	8,076

Current Specialist provision in Brighton and Hove

The January 2026 school census shows that around 70% of school-aged pupils with an EHCP are educated in mainstream schools, including those attending resourced provisions and SEN units. Around 20.2% attend special schools.

The wider SEN2 cohort presents a different profile as it includes all children and young people aged 0–25 with an EHCP, including those in further education, alternative provision and other specialist settings.



~70%

of school-aged pupils with an EHCP are educated in **mainstream** schools (including resourced provisions and SEN units)

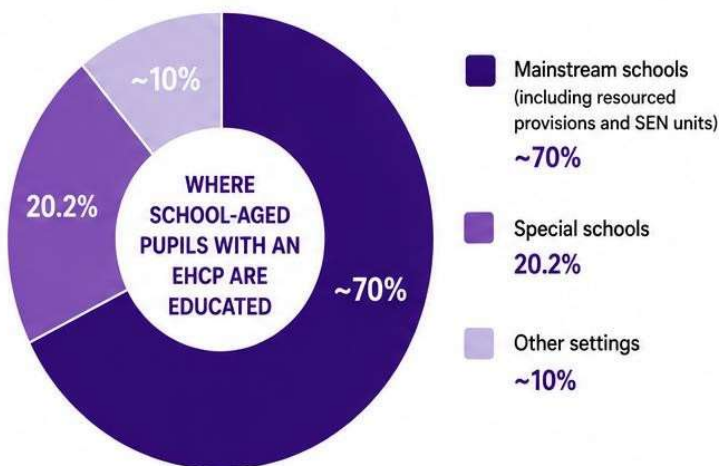


20.2%

of school-aged pupils with an EHCP attend special schools

SCHOOL CENSUS (JAN 2026)

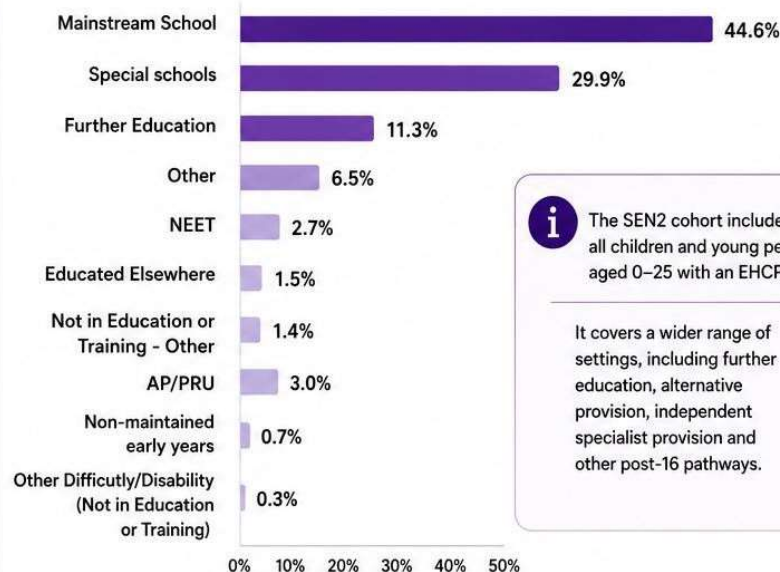
EDUCATION OF SCHOOL-AGED PUPILS WITH AN EHCP



Source: School Census January 2026 (school-aged pupils only)

WIDER SEN2 COHORT (0–25)

BREAKDOWN BY EDUCATION ESTABLISHMENT TYPE



Source: SEN2 January 2026 (0–25 cohort)



The SEN2 cohort includes all children and young people aged 0–25 with an EHCP.

It covers a wider range of settings, including further education, alternative provision, independent specialist provision and other post-16 pathways.



KEY TAKEAWAY: Most school-aged pupils with an EHCP are educated in mainstream schools. The wider 0–25 cohort shows a broader range of educational settings.

87

The total cost of external school-based placements increased from £5.17m in 2022/23 to £5.82m in 2025/26, an increase of £647k (12.5%), despite placement numbers remaining broadly unchanged. The average cost of an independent or non-maintained special school placement increased from £38,474 to £41,582 over the same period. Costs associated with specialist provision commissioned from other local authorities have risen more significantly, with the average placement cost increasing from £13,502 to £20,079.

11

Projections of future demand for school age population for Autism and Social, Emotional and Mental Health

The local data demonstrates that the city needs to prioritise developing provision for Autism (84% rise in 10 years) and SEMH (over 30% increase in 10 years). Detailed projection work has been carried out on these populations, and this can be found in the data and information pack.

Brighton C Hove City Council undertook analysis in May 2025 to provide projections of children and young people aged 0 to 25 with EHC plans for each year from 2026 to 2032 by Autism and Social, Emotional and Mental Health categories of need. This is for the Brighton and Hove resident population of children and young people and not those attending education establishments within the Brighton and Hove area.

The number of children and young people aged 0-25 with an EHC Plan is projected to increase from 2,886 in May 2025 to 4,427 in 2032, an increase of 50% in terms of the number of children and young people. Or an increase from 4.0% to 6.1% of 0–25-year-olds.

Table A: Projected number and percentage of children and young people aged 0–25, with an EHCP, Brighton & Hove residents, 2025 to 2032

Year	Projected number	Population age 0 to 25	Projected percentage of 0–25-year-olds
2025	2,886	72,112	4.0%
2026	3,108	72,238	4.3%
2027	3,332	72,195	4.6%
2028	3,554	72,242	4.9%
2029	3,769	72,230	5.2%
2030	3,990	72,171	5.5%
2031	4,214	72,210	5.8%
2032	4,427	72,134	6.1%

Source: Brighton & Hove City Council education team (May 2025)

By primary need, it is projected that:

- The number of children and young people with autism aged 0-25 years as their primary need will increase from 1,058 in 2025 to 1,912 in 2032 – an 81% increase. Or an increase from 1.5% to 2.7% of all 0–25-year-olds.
- The number of children and young people aged 0-25 years with social, emotional or mental health (SEMH) needs as their primary need will increase from 598 in 2025 to 973 in 2032 – a 63% increase. Or an increase from 0.8% to 1.3% of all 0–25-year-olds.
- The number of children and young people aged 0-25 years with other primary needs will increase least, from 1,230 in 2025 to 1,432 in 2032 – a 16% increase. Or an increase from 1.7% to 2.0% of all 0–25-year-olds.

Table B: Projected number and percentage of children and young people aged 0–25, with an EHCP by primary need, Brighton & Hove residents, 2025 to 2032

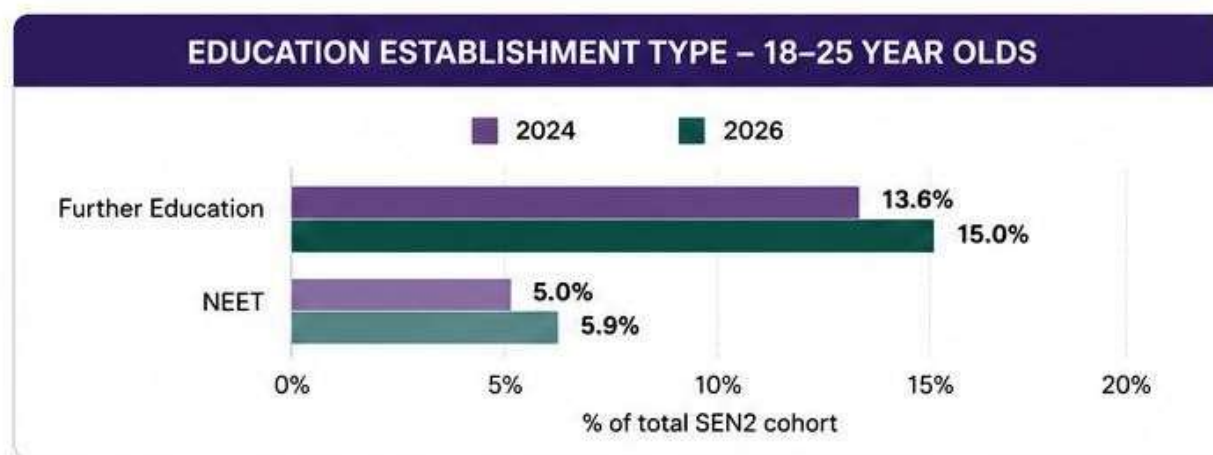
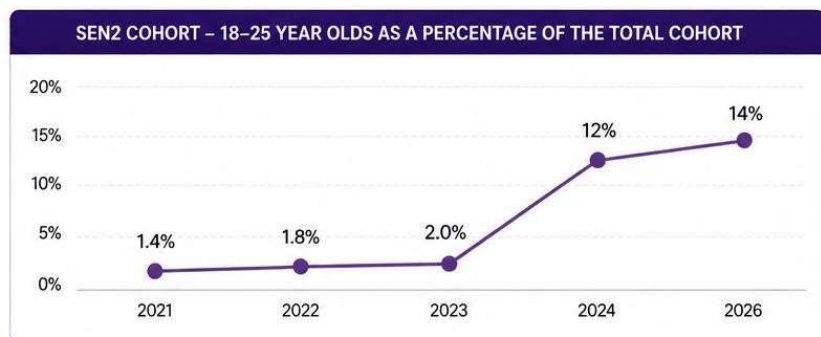
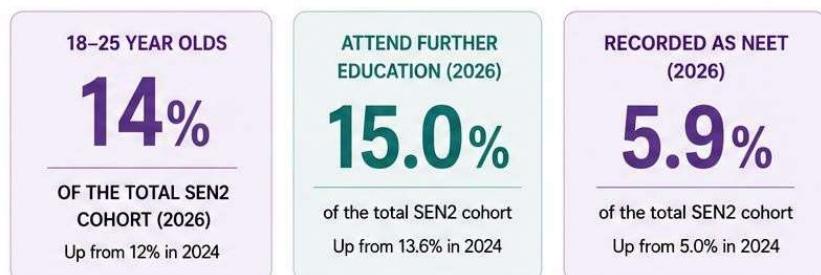
Year	Numbers			Percentage of 0–25-year-olds		
	Autism	SEMH	Other	Autism	SEMH	Other
2025	1,058	598	1,230	1.5%	0.8%	1.7%
2026	1,182	658	1,268	1.6%	0.9%	1.8%
2027	1,304	720	1,308	1.8%	1.0%	1.8%
2028	1,428	779	1,347	2.0%	1.1%	1.9%
2029	1,550	835	1,384	2.1%	1.2%	1.9%
2030	1,671	897	1,422	2.3%	1.2%	2.0%
2031	1,794	958	1,462	2.5%	1.3%	2.0%
2032	1,912	973	1,432	2.7%	1.3%	2.0%

Source: Brighton & Hove City Council education team (May 2025)

Post 16

Most young people with an EHC plan aged 16–19 attend mainstream further education colleges across Brighton C Hove, East Sussex and West Sussex. The strategic development of post-16 provision is coordinated across Sussex through the Post-16 SEND Strategic Planning Group, which includes representatives from all local authorities. Whilst local specialist provision supports some young people, others continue to access specialist placements outside the city.

The number of young people aged 18–25 with an EHC plan continues to grow and now represents a significant proportion of the overall EHCP cohort. As of January 2026, 14% of all EHC plans maintained by Brighton C Hove were for young people aged 18–25, compared with 12% in 2024.

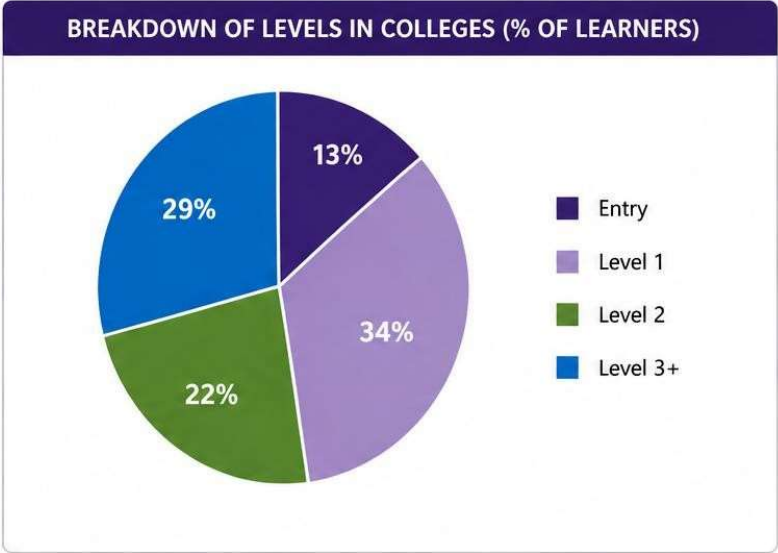
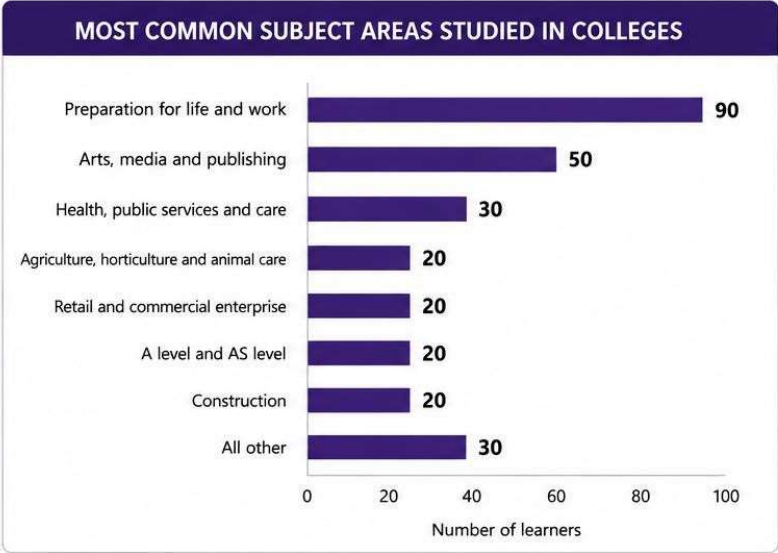


Source: SEN2 (2026 and 2024), RCU Research & Market Intelligence, DfE (2024)

Autism and Social, Emotional and Mental Health (SEMH) remain the most prevalent primary needs within the post-16 cohort. Research commissioned by the Sussex Post-16 SEND Strategic Planning Group indicates that demand from learners with autism is expected to continue increasing significantly over the coming decade.

Most post-16 learners with an EHC plan attend further education provision. The proportion of the SEN2 cohort attending further education increased from 13.6% in 2024 to 15.0% in 2026. Brighton C Hove continues to experience higher levels of young people with an EHC plan who are not in education, employment or training (NEET) than national comparators.

Research commissioned by the Strategic Planning Group identified approximately 280 learners with an EHC plan attending mainstream further education provision across the city. Learners access a broad range of courses from Entry Level through to Level 3+, with Level 1 programmes representing the largest area of provision.



SPECIALIST POST-16 PROVISION IN THE CITY (ACTUAL NUMBERS)

Provider	Places
Downs View Link College	46
Downs View Life Skills	31
Supajam (INMS)	28
St Johns Integrated College	4
St Johns College	8
TOTAL	117

SUPPORTED INTERNSHIPS IN THE CITY (ACTUAL NUMBERS)

Provider	Places
Team Dominica	24
St Johns Project Search	4
TOTAL	28

A smaller cohort of young people access specialist post-16 provision and supported internships. Current local specialist provision includes Downs View, Supajam and St John's College, alongside a range of supported internship opportunities. There remain a number of young people who require independent specialist provision outside Brighton C Hove.

Insights for future provision

Financial Pressures

External placements: Costs up £1M in 3 years; average INMS placement £38,825.
High Needs Block: £40M budget; £23.6M spent on special schools; £4.76M on INMS.

Demand Trends

EHCP growth: 67% increase over 5 years; rising 10–13% annually.
Projected EHCPs: From 2,886 (2025) to 4,427 (2032) – 50% increase.
Autism & SEMH: Autism up 81%, SEMH up 63% by 2032.
Early Years: Most plans start at age 5; early intervention is critical.

Post-16 Insights

EHCP learners in colleges rose to 280 (23/24); autism predicted to double by 2033.
Most popular courses: Level 1, life/work prep, arts/media, health/public services.
Need for specialist pathways and supported internships

Health s Diagnostic Context

Long waits for autism/ADHD diagnosis (up to 4 years); 18,000 CYP waiting in Sussex.
Implications: Schools need robust support for undiagnosed neurodiverse pupils.

Strategic Priorities

Develop primary autism resource provisions (1 central and 1 east).
Create secondary autism resource provisions.
Consider primary specialist provision for autism and SEMH that includes mainstream school as part of the model.
Expand secondary provision for autism + SEMH (2027/28).
Rationalise SEMH provision; ensure PRU/Specialist capacity.
Explore KS1 SEMH provision.
Address post-16 gaps: work with FE providers, expand supported internships.

Current Gaps

20% of pupils placed outside Brighton & Hove.
Autism provision: Hive and Cullum Centre provide well, but demand exceeds capacity.
SEMH provision needs rationalisation.
Post-16: High NEET rate; limited supported internships.
The provision of high quality data.

Health Data

NHS National Referral Numbers and Waiting times

Autism: As of March 2025, 137,977 children were waiting for an autism assessment in children's mental health services.

ADHD: The number of children waiting for an ADHD assessment was significantly higher up to 316,000 children.

These figures reflect a growing demand for neurodevelopmental assessments, with many services overwhelmed and unable to meet the rising need.

Autism

As of June 2025, 236,225 people (including children and adults) were waiting for an autism assessment.

89% of those waiting had exceeded the 13-week NICE guideline for assessment.

The average waiting time for an autism assessment is now over 17 months, which is 200 days longer than the previous year.

ADHD

ADHD waiting times vary widely across regions. Some children wait over four years for a diagnosis.

Brighton and Hove

The Brighton and Hove Neurodevelopmental Pathway (NDP) Team within Sussex CAMHS is the smallest team both geographically as well as size. In the year 2025, Brighton NDP team completed 72 full diagnostic assessments. This includes ADHD assessments, ASC assessments and assessments that concluded non- diagnosis. This does not include partial or incomplete assessments. The frequency of diagnosis is almost split equally between the 2 conditions. Sussex CAMHS Neurodevelopmental Services receive more than 600 referrals per month which is leading to long waits for a full assessment and diagnosis.

It is considered that there are approximately 18,000 children and young people in Sussex waiting for a Neuro Developmental Pathway (NDP) assessment with Sussex CAMHS.

Reliable NHS Sussex data on diagnostic rates in Sussex has been difficult to publish in recent years due to the need for an updated data system. A new system is now in operation, and more reliable data will be possible to collate. (agreed statement with CAMHS)

Financial analysis

The high needs block (HNB) funds all the support to SEND and vulnerable young people 0-25.

In 24/25 financial year the value of the HNB is just under £40 million, rising to just over £40 million in 25/26. Approximately £9.2 million is spent on mainstream EHCP's and resource provisions and £23.6 million is spent on special school provision (including the council's special schools and alternative provision).

The remaining budget funds medical needs support, inclusion and support services and the virtual school.

Provision Type	2024/25 (£)	2025/26 (£)	Change (£)	Change (%)
Mainstream Top-Up Funding (BHCC Schools & Academies)	5,965,184	7,250,694	+1,285,510	+21.6%
Special School Funding (including Central Hub)	14,280,675	15,885,642	+1,604,967	+11.2%
Specialist Units & Resource Bases	1,732,945	2,053,098	+320,153	+18.5%
Top-Up Funding for Schools in Other LAs	1,142,179	1,690,560	+548,381	+48.0%
Independent & Non-Maintained Special Schools	5,400,000	5,820,000	+420,000	+7.8%
Personal Budgets, EOTAS & Alternative Provision	1,371,803	2,131,664	+759,861	+55.4%
Post-16 Colleges & Providers	1,170,390	1,246,603	+76,213	+6.5%
Post-19 Specialist Providers	2,007,535	2,128,295	+120,760	+6.0%

Future provision will fit into one of the above categories and will be costed as such.

How this plan was developed

The SEND Strategy 2021-2026 was the driver for the SEND sufficiency plan. The strategy has 6 outcomes to achieve the **better outcomes, better lives** vision which are:

1. Inclusion
2. Early Identification and Intervention
3. SEND Pathways
4. Achievement and Outcomes
5. Transition and Preparing for the Future
6. Sufficiency of SEND Services and Provision (SF1-SF16)
7. Development of Alternative Provision (added as part of the SEND and AP Change Programme work)

The sufficiency plan is the outworking of outcome 6, 'Sufficiency of SEND Services and Provision'. from

In the first 4 years some of the original actions (1-16) in the first sufficiency workplan were achieved.

The SEN Sufficiency Workstream was revised in January 2025 in line with Education and Learning Directorate's workstream agreements with schools. This workstream (comprised of school and provision leaders, LA officers and parent carer forum representation) has supported the development of the plan

To ensure the right provision is being developed at the right time, a full data refresh was requested in January 2025. This ensured that developments were being made in the right areas, and the council is neither under or overproviding for any type of SEND needs.

The plan needs to dovetail with the Schools White Paper and any changes in the delivery of AP services (programme leads are a part of the group membership)

The plan will need to be further developed with the education community, children and young people, parent representative groups and stakeholders.

What we have done so far and what is planned

1. The Brighton and Hove Principles of belonging

Priority 1 of the SEND Strategy 2021–2026 focuses on Inclusion. The Inclusion action plan (Inclusion 1) focussed on the co-production of a city-wide charter for inclusion. This was co-produced with children and young people and led to the development of the principles of belonging.

- Happy
- Safe and secure
- Heard
- Accepted

These principles enable children and young people to grow and learn. All provision must be developed in this way to enable to principles to be put into practice.

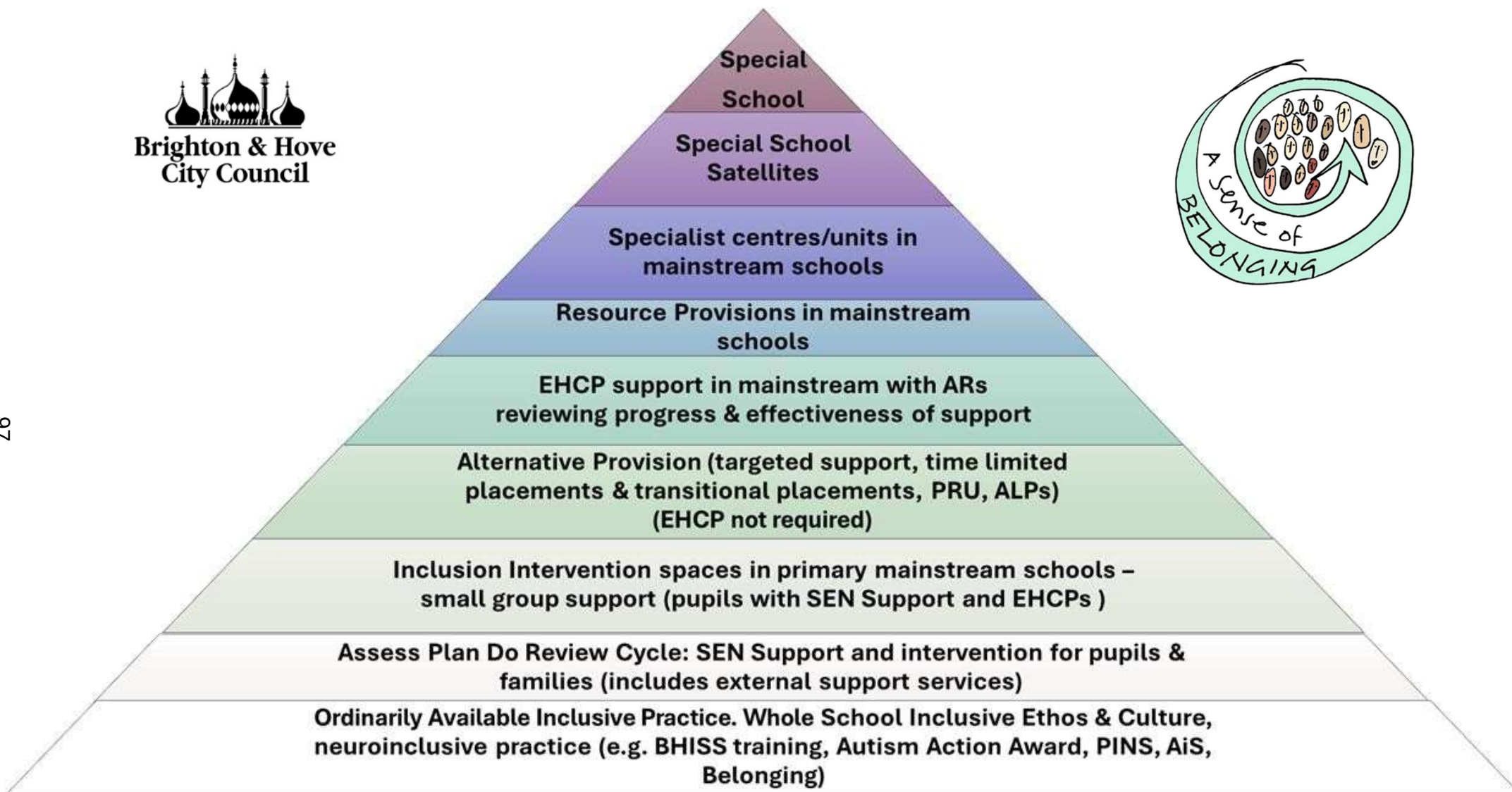
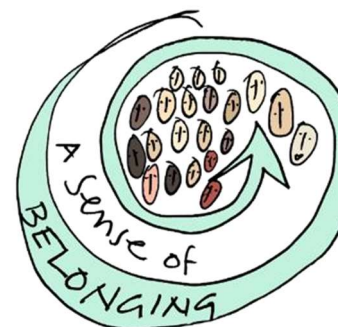
2. Ordinarily Available Inclusive Practice (OAIP) guidance has been co-produced over the course of a year, for schools and is due to be launched in March 2026.

Brighton C Hove has co-produced (with parents/carers, young people, schools and a range of education professionals) a city-wide Ordinarily Available Inclusive Practice (OAIP) guidance to define what mainstream schools should reasonably be able to provide for children and young people with SEND without requiring an EHC Plan. This guidance aims to:

- Promote inclusive education through high-quality teaching and learning.
- Set clear expectations for schools and early years settings.
- Encourage consistency across educational settings.
- Support educators with effective strategies to meet diverse needs.
- Embed inclusive teaching approaches that benefit all learners 1.

The first draft of this guidance will launch in March 2026 for schools, with a review of its effectiveness taking place with stakeholders in autumn 2026. Following a year of piloting the guidance, feedback received from the review will then be used to update the guidance into a final draft which will be available to schools in January 2027. Work on drafting a version of the guidance for parents/carers will begin in Spring 2026 ready to upload onto the council's Local Offer web page in Summer 2026.

SEND Provision Graduated Approach in Schools



Over the period of the SEND Strategy the following interventions and provisions have been developed:

Tier 1: (Targeted Support)	In September 2024, 5 primary schools were identified to run a Inclusion Intervention Spaces (IIS) pilot. All schools had set up the provision by the spring term 2025 and were starting to gather data and feedback from children, parents and staff. Review and evaluation demonstrated that the pilot was successful meeting all the desired outcomes, and phase 2 will commence in the 2025/26 academic year with a further 8 schools. Funding was given to assist secondary schools with Tier 1 (targeted support) development. A robust evaluation of the impact of this funding demonstrated an increase in positive outcomes for children and young people. The council has committed to continue to provide this funding on an annual basis
Tier 2: (Targeted support)	ALPs (Adaptive Learning Provisions) are being developed in four of our secondary schools.. The ALP at Patcham High school is now well established, as is the ALP at Varndean secondary school. Each ALP is funded for 9 places and is supported by an educational psychologist and a senior SEMH practitioner. Feedback on this Tier 2 (targeted support) model has been positive and data using an agreed set of Key Performance Indicators is currently being gathered to show impact. Two further ALPs, opened at the start of Spring Term 2026 with Blatchington Mill and BACA Secondary Schools, and are now receiving young people into their ALPs. There is a total of 36 Tier 2 ALP places available to support young people across the four secondary schools. As part of the SEND C AP Change Programme pilot work, the Alternative Provision Specialist Taskforce (APST) was initially co-located at the Central Hub. The original remit for the APST was to work with children and young people who were most at risk of criminal activity in the community and those at significant risk of permanent exclusion. Specialist staff worked with the Central Hub to support the Tier 2 turnaround programme and reintegrate young people back into school, From September 2025, the APST model moved out of CHB to operate as an outreach team, co-located in two primary schools and one secondary school. The APST is now working primarily as an early intervention outreach team, focusing on young people who are at risk of exclusion. Funding for this team has been provided through the Change Programme which will finish in July 2026.
Tier 3: (Targeted Plus)	The Central Hub Brighton, which provides places for children and young people with social, emotional and mental health provision, has expanded full time/long stay places to support children and young people who are moving on to a new setting or to post 16 provisions (if placed at the Connected Hub KS4)
Tier 4: (Specialist)	The Hive, part of Hill Park Special School opened for secondary aged children with autism and by September 2024 had 45 pupils on roll. It now has 67 places. The Cullum Centre was opened in September 2021, a specialist secondary phase unit for children with autism, at Hove Park School. It has since extended provision into KS5 and supports a preparation for adulthood focus supporting young people in Further Education. Homewood School closed for children and young people with SEMH, in September 2024, The Central Hub made provision for year 7 pupils (year 7 and 8 from September 2025, 24 places). Beckmead Academy Trust opened KS4 provision at St George's House which has 20 places.

SEND Sufficiency Plan 5 Key Priorities 2026-202G:

1. Expand Provision for neurodivergent pupils in mainstream	<u>Actions:</u> Identify and agree sites for primary and secondary autism support bases during 2025/26. Open Moulsecoomb Primary Autism Support Base (The Roost): Phase 1: 8 pupils – January 2026 Phase 2: 8 pupils – April 2026 Develop Stanford Junior Autism support base 12-16 places – 2027. Establish 20-place secondary Autism support base – September 2027. Establish 20-place secondary Autism/SEMH specialist support base– September 2028.
2. Strengthen SEMH Provision	<u>Actions:</u> Rationalise SEMH provision across the city including a review of the Central Hub Brighton (CHB), creating a vision and purpose for future need. Establish Tree House primary PRU as a pilot for an academic year 2025/26. Evaluation summer 2026. Create 12 specialist Year 9 SEMH places by September 2026. Work with schools enabling them to create a more inclusive/principles of belonging approach to managing young people with an SEMH profile (reduction in suspensions, permanent exclusions and managed moves). Through the Inclusion workstream, co-produce and financially model a robust Outreach Support offer for schools which will replace the current APST when it comes to an end in July 2026.
3. Develop Specialist Autism /SEMH Provision	<u>Actions:</u> Design and open 3 primary specialist support bases (12-16 places per unit) in mainstream schools for children with autism and SEMH (36-48 places) Include assessment places and outreach/training model for mainstream schools. Target opening: September 2028.
4. Strengthen Early Years and Primary Specialist/support base provision	<u>Actions:</u> Strengthen the provision of specialist nursery places in the city and the transition of children into school through phased development of Early years Inclusion Bases in geographical areas in the city (8 places per base) Develop 2 support bases in mainstream schools (12-16 places per unit) for children who have complex needs (target opening September 2027). Create EYFS specialist places. Include outreach/training model for mainstream schools
5. Address Post-16 Provision gaps	<u>Actions:</u> Continue to work Sussex wide in the development of appropriate post 16 courses Review post-16 SEND provision and collaborate with providers to ensure appropriate pathways and capacity Increase Supported Internships in the city to create more opportunities for work (20 places)

All developments are dependent on good and frequent communication with stakeholders. The Council will work with key partners through the SEND and AP partnership Board to ensure strategic oversight and governance is in place.

Stakeholders will receive updates on the plan and the progress towards the key priorities through established communication channels.

Glossary of Terms

ADHD	Attention Deficit Hyperactivity Disorder
BHCC	Brighton and Hove City Council
SEMH	Social Emotional and Mental Health Needs
SLD	Severe Learning Difficulties
EHC	Education, Health and Care
PRU	Pupil Referral Unit
ALP	Adaptive Learning Provision (Secondary schools)
IIS	Inclusion Intervention Space (Primary schools)
APST	The Alternative Provision Specialist Taskforce
NDP	Neuro Developmental Pathway
INMS	Independent Non-Maintained School
AP	Alternative Provision
P16	Post 16
HNB	High Needs Block
PiNS	Partnerships for Inclusion of Neurodiversity in Schools
AiS	Autism in Schools

This plan will remain a flexible document and will be reviewed and adjusted in line with any legislative changes ensuring compliance and alignment with statutory requirements

General Equality Impact Assessment (EIA) Form

Support:

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

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

Processing Time:

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

Process:

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

1. Assessment details

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

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

Name of activity or proposal being assessed:	Special Educational Needs and Disabilities (SEND) Sufficiency Plan 2026-2029
Directorate:	Families, Children and Wellbeing
Service:	Education and Learning
Team:	SEND Statutory Service/School Organisation
Is this a new or existing activity?	New strategic activity. The SEND Sufficiency Plan 2026-2029 is a strategy setting out how the Council will discharge its statutory duty under Section 14 of the Education Act 1996 to secure sufficient school places for children and young people with SEND. It builds on the SEND Strategy 2021-2026, in which SEND sufficiency was identified as one of the six key priorities.

Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)	The Plan is a strategic enabling document. Each individual provision proposal that flows from it will be the subject of its own statutory process and its own individual Equality Impact Assessment in due course.
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2. Contributors to the assessment (Name and Job title)

Responsible Lead Officer:	Rhianned Hughes, Head of SEN Statutory Service
Accountable Manager:	Georgina Clarke-Green, Director of Education and Learning
Additional stakeholders collaborating or contributing to this assessment:	

3. About the activity

Briefly describe the purpose of the activity being assessed:

The SEND Sufficiency Plan 2026–2029 sets out the city's strategy for ensuring sufficient and appropriate education places for children and young people with Special Educational Needs and Disabilities (SEND) over the next three years, and identifies a programme of new and expanded provision to address known and projected gaps in capacity.

Demand for SEND places in Brighton & Hove has grown significantly over the past decade. In January 2025, 24% of pupils in the city (7,263) were identified as having SEND, compared with the national average of 18%. The number of children and young people with an Education, Health and Care Plan (EHCP) is projected to rise from 2,886 in May 2025 to 4,427 by 2032, an increase of 50%. Autism and Social, Emotional and Mental Health (SEMH) needs continue to be the largest and fastest-growing categories of need.

The Plan responds by setting out a phased programme of provision, the headline elements of which are: three new Autism Resource Units (ARUs) of 20 places each at Patcham High School, Cardinal Newman Catholic School and Stanford Junior School; a further expansion of Inclusion Intervention Spaces (IIS) in primary schools (an additional 10 places in 2026/27); and changes underway at the Central Hub Brighton (CHB), the city's specialist alternative provision for children with SEMH needs, including a new leadership model and proposed site changes for 2026/2027.

The Plan has been developed in the context of significant national SEND and Alternative Provision (AP) reform, including the SEND and AP Improvement Plan (2023), the Schools White Paper 'Every Child Achieving and Thriving' (2025) and the parallel SEND Reform consultation 'Putting Children and Young People First' (2025). It is consistent with the Council's Principles of Belonging and the Ordinarily Available Inclusive Practice (OAIP) guidance.

The SEND Sufficiency Plan is not itself a statutory document. It sets out the Council's strategic approach to discharging its Section 14 duty and informs the prioritisation and sequencing of individual provision proposals. Each individual proposal that requires a statutory process — for example a prescribed alteration under the Education and Inspections Act 2006 — will be the

subject of separate consultation, statutory notice, decision-making and its own Equality Impact Assessment.

What are the desired outcomes of the activity?

The desired outcome of the SEND Sufficiency Plan 2026–2029 is that children and young people with SEND in Brighton & Hove can access sufficient, appropriate and high-quality education provision that meets their needs as close to home as possible.

The Plan is intended to increase local specialist capacity in a planned way, reduce reliance on costly out-of-area placements, and improve the ability of mainstream schools and specialist settings to respond to rising demand, particularly in relation to autism and SEMH needs.

It also aims to support earlier intervention, greater inclusion and better transition pathways for children and young people with SEND, so that more pupils are able to learn in the right provision at the right time, with improved consistency of support and improved outcomes for families.

At a strategic level, the Plan is intended to provide a clear framework for prioritising future provision proposals and investment decisions, ensuring that the Council can meet its statutory sufficiency duties in a way that advances equality of opportunity and supports an inclusive education system across the city.

These outcomes directly support the three aims of the Public Sector Equality Duty (PSED) under section 149 of the Equality Act 2010: (1) eliminating unlawful discrimination, harassment and victimisation — by reducing structural barriers to appropriate provision and ensuring all children with SEND can access education without being disadvantaged by their disability or other protected characteristics; (2) advancing equality of opportunity — by creating sufficient local specialist provision, improving early identification, and strengthening inclusive practice so that children with SEND have equitable access to appropriate education alongside their peers; and (3) fostering good relations — by promoting inclusive schooling, building understanding of diverse needs across school communities, and supporting the integration of specialist provision within mainstream settings.

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

The groups most directly affected by the Plan are children and young people with SEND (in particular those with autism and SEMH needs) and their families; the school communities of the schools identified as hosts for new provision; and staff working in specialist and alternative provision, including at the Central Hub Brighton. The Plan also affects the wider school system, given the move towards SEND school groupings and a more inclusive mainstream offer.

4. Consultation and engagement

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

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

- The draft Plan has been developed through the SEN Sufficiency Workstream, which was revised in January 2025 in line with the Education and Learning Directorate's workstream agreements with schools. The workstream comprises school and provision leaders, Council officers and Parent Carer Forum representation, and has supported the development of the Plan throughout.
- A full data refresh was commissioned in January 2025 to ensure that proposed developments are informed by the most recent picture of need, and that the Council is neither under-providing nor over-providing for any type of SEND need.
- Particular attention has been given to ensuring that the views of children and young people with SEND, their families, and those with other protected characteristics are heard. This has included targeted consideration of Black, Asian and Minority Ethnic (BAME) and Black and Racialised Minority (BRM) parent carers with children who have SEND; families where English is an Additional Language (EAL); and children and families living in temporary accommodation, who can face heightened barriers to engagement and to maintaining continuity of specialist provision. Accessible formats and targeted engagement have been offered, working closely with the Parent Carer Council (PaCC), and other recognised representative groups.
- Engagement with PaCC confirmed that parent carers value increased local provision and the reduction in out-of-area placements as a priority, and raised the importance of consistent transition support, clear communication about how new provision will be accessed, and the need for schools to have the skills and resources to support children before EHCP thresholds are reached.
- Reaching out to young people, through various other recognised representative groups reinforced the importance of proximity to home, peer relationships and consistency of staffing in any new provision. These insights have directly informed the Plan's emphasis on phased and locally-rooted provision, and will be incorporated into the project-level EIAs for each individual proposal.
- As the Plan is a strategic framework, it does not itself carry a single statutory consultation. Each individual provision proposal arising from the Plan — including each of the three proposed Autism Resource Units — will be the subject of its own formal public consultation and statutory notice, and the equalities feedback gathered through those consultations will inform the project-level EIA for each proposal. This EIA will be reviewed and updated as that engagement takes place.

5. Current data and impact monitoring

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

(State Yes, No, Not Applicable as appropriate)

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

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

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

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

For characteristics currently recorded as "NO" in the table above data is either not routinely collected for the pupil population or is not directly relevant to the strategic nature of this Plan.

The Council will take the following steps to improve data coverage where practicable.

For individual provision proposals arising from this Plan, project-level EIAs will identify relevant data gaps and set out how those gaps will be addressed through local engagement and targeted outreach.

Where characteristics such as EAL status, refugee or asylum-seeker status, or temporary accommodation are relevant to access to SEND provision, the Council will work with relevant services (including the Virtual School Head) to understand and address barriers at the project level.

Feedback from consultation with recognised representative groups will continue to be used as qualitative evidence to supplement formal data, including on characteristics that are harder to capture quantitatively.

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

6. Impacts

Advisory Note:

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

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

6.1 Age

Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: older people, people who may be housebound, those under 16, young adults, with other intersections.	YES
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If "YES", what are the positive and negative disproportionate impacts?

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

The Plan affects children and young people with SEND across the full 0–25 age range. The provision programme is deliberately phased across age groups: primary (Key Stage 2) autism provision through the proposed Stanford Junior ARU; secondary autism provision through the proposed Patcham High and Cardinal Newman ARUs; early intervention through the expansion of Inclusion Intervention Spaces in primary schools; and continued specialist alternative provision for SEMH needs through the Central Hub Brighton, including the Treehouse (primary) and the Connected Hub (Year 11).

Demand data shows growth in need across all phases, with particular pressure at transition points and a decline in Reception transfers to special schools (from a peak of 22 in 2023 to 17 in 2025) reflecting capacity pressure rather than reduced demand. By planning provision across the age range, the Plan is intended to address need at the point and phase at which it arises.

The impact is assessed as positive, in that the Plan is designed to increase age-appropriate local provision. No adverse age-related impact has been identified at the strategic level.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

Phasing of provision will continue to be informed by the annual data refresh, so that capacity is created in the right phase at the right time.

Transition planning between phases (Early Years to primary, primary to secondary, and Key Stage 4 to post-16) will be a specific consideration in the design of each new provision and will be addressed in the project-level EIA for each proposal.

Particular attention will be given to the transition for young people aged 16 and above, who are at known risk of falling out of the SEND system at the point of reaching adulthood. The Plan recognises that the EHCP framework extends to age 25, and the Council is committed to ensuring that young people with SEND are not “lost” at the 16+ transition.

The annual data refresh will track the destination and provision status of young people with EHCPs beyond Key Stage 4, and the SEN Sufficiency Workstream will consider whether current post-16 and further education capacity is adequate to meet projected demand. Where gaps are identified, they will be escalated to the relevant commissioning leads and addressed in future iterations of the Plan.

6.2 Disability:

Does your analysis indicate a disproportionate impact relating to [Disability](#), considering our [anticipatory duty](#)?

YES

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

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

Disability and SEND are at the very heart of this Plan; children and young people with SEND are the principal intended beneficiaries. In January 2025, 24% of pupils in the city were identified as having SEND, against a national average of 18%, and 5.8% held an EHCP (national average 5.3%). The number of EHCPs is projected to rise by 50% to 2032.

Without further action, the Council would be unable to meet its Section 14 duty to provide sufficient school places for children with SEND, and reliance on out-of-area and independent/non-maintained provision — which has risen by approximately £1 million over the last three years — would continue to grow. The Plan is intended to reverse this by creating local, appropriate provision and enabling more children with disabilities to be educated close to home.

The impact on disabled children and young people is therefore assessed as strongly positive. The principal risks are implementation risks — that new provision is not designed to be fully accessible, or that transition into new provision is poorly managed — rather than risks inherent in the strategy itself.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

Each new resource base and provision will be designed to meet the needs of the children it is intended to serve, with accessibility, sensory and SEN design requirements built in from the outset and assessed through the project-level EIA and the statutory process for each proposal.

The Council will continue to apply the SEND Code of Practice and the Principles of Belonging, and will ensure that the expansion of provision does not inadvertently create a two-tier offer; the move towards Ordinarily Available Inclusive Practice (OAIP) is intended to strengthen the mainstream offer alongside specialist provision.

Home to School Transport assistance will continue to be available to eligible children, and the increase in local provision is itself expected to reduce the need for long-distance travel for many disabled children.

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

As a strategic plan concerning SEND provision, inclusive adjustment considerations are embedded throughout the Plan and will be operationalised at the project level.

The following adjustments apply at the strategic level:

- Physical accessibility — all new and expanded provision will be required to meet current accessibility standards, including for wheelchair users, those with mobility difficulties, and children with sensory impairments. Accessibility requirements will be assessed as part of the capital design process for each new provision and addressed in the project-level EIA.
- Communication and information — all consultation and information materials relating to this Plan and individual proposals will be available in accessible formats, including Easy Read, large print and digital accessible formats, and in community languages with translation and interpreting on request.
- Neurodivergent and sensory needs — the design of new Autism Resource Units and Inclusion Intervention Spaces will specifically incorporate SEN design standards, including appropriate sensory environments, clear circulation routes and quiet spaces, to ensure the physical environment is accessible and supportive for neurodivergent children.
- D/deaf and hearing-impaired children — the needs of D/deaf or hearing-impaired children will be considered in the design of new provision, and specialist support will continue to be available in conjunction with the Sensory and Physical Support Service.
- Children with non-visible disabilities — the Plan's emphasis on strengthening the mainstream offer through Ordinarily Available Inclusive Practice (OAIP) is specifically intended to improve the identification of and support for children whose needs are not immediately visible and who may not yet have an EHCP.

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

Does your analysis indicate a disproportionate impact relating to ethnicity?	NO
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If "YES", what are the positive and negative disproportionate impacts?

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

The Plan applies to all children and young people with SEND in the city regardless of ethnicity. National evidence indicates that there are differences in the rates at which SEND is identified across ethnic groups, and that some communities can experience barriers to accessing assessment and support.

No disproportionate adverse impact on any ethnic group has been identified at the strategic level. By increasing local provision and strengthening early identification and inclusive practice, the Plan has the potential to reduce, rather than widen, any differential access to appropriate provision.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

The Council will monitor patterns of SEND identification and access to new provision by ethnicity, to ensure the benefits of the Plan are shared equitably.

Engagement and consultation materials for individual provision proposals will be made available in accessible formats and community languages, with translation provided on request, so that families from all backgrounds can engage.

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

Does your analysis indicate a disproportionate impact relating to Religion, Belief, Spirituality, Faith, or Atheism?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

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

No disproportionate impact on the grounds of religion or belief has been identified. The Plan is concerned with the sufficiency and type of SEND provision and does not alter the faith or non-faith character of any school.

It is noted that one of the proposed Autism Resource Units is located at Cardinal Newman Catholic School. The siting of provision at a faith school does not, of itself, give rise to an adverse equalities impact, and admission to a resource base attached to a mainstream school is determined by the child's EHCP and assessed need, not by faith.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

Where provision is located at a faith school, the Council and the school will ensure that the resource base is inclusive of and welcoming to children of all faiths and none, and that this is clear in the published arrangements for the provision.

The timetabling of consultation activity for individual proposals will take account of significant periods of religious observance.

6.5 Gender Identity and Sex:

Does your analysis indicate a disproportionate impact relating to Gender Identity and Sex (including non-binary and intersex people)?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

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

Autism and SEMH — the two largest and fastest-growing categories of need addressed by the Plan — are, both nationally and locally, identified more frequently in boys. There is, however, growing national recognition that autism in particular is under-identified in girls, who may present differently and be diagnosed later. A sufficiency programme weighted towards autism and SEMH provision could, if not carefully designed, risk entrenching a male-weighted pattern of access.

For staff, the specialist and alternative provision workforce, like the wider education workforce, is predominantly female; changes to provision may therefore have a gendered dimension where they affect staffing.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

The design and admission arrangements for new provision will be alert to the under-identification of autism in girls, and the Council will continue work — through early identification, OAIP and the Experts at Hand model envisaged nationally — to ensure girls with SEND are identified and supported.

Any staffing implications arising from changes to provision will be managed through the Council's and schools' usual HR and equalities processes, with an Equality Impact Assessment completed in relation to any HR proposals at the point staff are formally consulted.

6.6 Gender Reassignment:

Does your analysis indicate a disproportionate impact relating to Gender Reassignment?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

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

No specific disproportionate impact has been identified in relation to gender reassignment. Data is not routinely collected and relies on self-disclosure.

The Council recognises that children and young people with SEND who are also exploring their gender identity may face intersecting vulnerabilities.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

Any child or young person who is transitioning or questioning their gender will be supported sensitively in any move to new provision, with settings directed to the Council's Trans Inclusion guidance and to voluntary sector organisations where appropriate

6.7 Sexual Orientation:

Does your analysis indicate a disproportionate impact relating to Sexual Orientation ?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

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

No specific disproportionate impact has been identified in relation to sexual orientation. The Council notes that Brighton & Hove has a nationally significant LGBTQ+ community and that the city's schools generally promote inclusive values.

Sexual orientation data is not routinely collected for pupils.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

New and changed provision will be expected to maintain an inclusive and anti-discriminatory ethos. Families or young people who experience discrimination will be signposted to appropriate support in the city.

6.8 Marriage and Civil Partnership:

Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

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

No disproportionate impact in respect of pupils has been identified. For staff, marriage and civil partnership are relevant principally in the context of any HR processes that may arise from changes to provision and are addressed through standard HR procedures.

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

Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

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

No disproportionate impact on pupils has been identified. For staff, pregnancy and maternity are relevant in the context of any staffing changes arising from changes to provision, and are

protected through the Council's and schools' HR processes and any EIA undertaken in relation to specific HR proposals.

6.10 Armed Forces Personnel, their families, and Veterans:

Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?	NO
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If "YES", what are the positive and negative disproportionate impacts?

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

No disproportionate impact specific to the armed forces community has been identified. Service children with SEND will benefit from improved local provision in the same way as other children, and Service Pupil Premium continues to be recorded and applied.

6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

Does your analysis indicate a disproportionate impact relating to Expatriates, Migrants, Asylum seekers, Refugees, those New to the UK, and UK visa or assigned legal status? (Especially considering for age, ethnicity, language, and various intersections)	NO
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If "YES", what are the positive and negative disproportionate impacts?

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

No disproportionate adverse impact on migrant, asylum-seeker, refugee or EAL families has been identified at the strategic level. These families can, however, face additional barriers in navigating the SEND system and in engaging with consultation.

By improving the clarity and transparency of the city's strategic approach to SEND sufficiency, the Plan may support better understanding of, and access to, provision for these families.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

Consultation and information materials for individual provision proposals will be available in community languages and accessible formats, with translation and interpreting provided on request.

6.12 [Carers](#):

Does your analysis indicate a disproportionate impact relating to Carers (Especially considering for age, ethnicity, language, and various intersections).	YES
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If “YES”, what are the positive and negative disproportionate impacts?

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

Parent carers of children with SEND are a key group affected by the Plan, and have been actively engaged in its development through the Parent Carer Council (PaCC), Amaze and the SEN Sufficiency Workstream. Many parent carers currently experience the burden of long daily journeys where their child is placed out of area, and the uncertainty of insufficient local provision.

By increasing local provision and reducing reliance on out-of-area placements, the Plan is expected to reduce travel and logistical burdens on parent carers and to improve continuity for the children they care for. The impact on this group is therefore assessed as positive.

Young carers within the affected school communities are also considered; changes to provision should not increase caring-related barriers to attendance.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

The Council will continue to work in partnership with PaCC and Amaze throughout the life of the Plan and the development of individual proposals, ensuring parent carers are involved in the design of provision their children will use.

The needs of young carers will be considered in transition planning for any individual provision proposal.

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

Does your analysis indicate a disproportionate impact relating to Looked after children, Care Leavers, Care and fostering experienced children and adults (Especially considering for age, ethnicity, language, and various intersections).

Also consider our [Corporate Parenting Responsibility](#) in connection to your activity.

YES

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

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

SEND is significantly over-represented among care-experienced children and Looked After Children, who are also more likely to experience SEMH needs and to be at risk of exclusion. This group is therefore disproportionately likely to benefit from the provision the Plan creates, including the expansion of Inclusion Intervention Spaces and the continued specialist SEMH provision at the Central Hub Brighton.

Stability and continuity of education are particularly important for this group, and increasing local provision reduces the risk of placement breakdown associated with distant or unsuitable provision. The impact is assessed as positive.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

The Virtual School Head will be engaged in the planning and prioritisation of provision and in transition planning for individual care-experienced children moving into new provision.

Personal Education Plans (PEPs) will reflect any changes in provision for individual care-experienced children.

6.14 Homelessness:

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

NO

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

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

No disproportionate adverse impact has been identified. Families in insecure housing may move more frequently and can find continuity of SEND provision harder to maintain; the increase in local provision and the reduction in reliance on distant placements may support greater stability for these families.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

The needs of children in insecure housing will be considered through safeguarding and pastoral channels in transition planning for individual proposals.

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

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

NO

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

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

No disproportionate adverse impact has been identified. The Plan does not alter safeguarding arrangements. Children affected by domestic abuse are more likely to present with SEMH needs and may benefit from the provision the Plan supports.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

Safeguarding considerations will be embedded in the design and operation of all new and changed provision, and addressed in the project-level EIA for each proposal.

6.16 Socio-economic Disadvantage:

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

YES

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

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

SEND and socio-economic disadvantage frequently co-occur, and families experiencing disadvantage are less able to absorb the costs and logistical demands of distant out-of-area placements. The rising cost of out-of-city placements (up approximately £1 million over three years) also places pressure on the High Needs Block, with consequences for the resources available to support all children with SEND.

By creating local provision and reducing reliance on higher-cost distant placements, the Plan is expected to benefit disadvantaged families disproportionately (in a positive sense) and to make more effective use of the High Needs Block. The impact is assessed as positive.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

The Council will monitor access to new provision to ensure disadvantaged children benefit equitably.

Home to School Transport assistance will continue to be available to eligible families, mitigating travel costs for those on low incomes.

6.17 Human Rights:

Will your activity have a disproportionate impact relating to Human Rights?

NO

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

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

The Plan engages the right to education (Article 2 of Protocol 1, ECHR) and, in supporting access to appropriate provision, advances rather than restricts that right. The Plan is consistent with the United Nations Convention on the Rights of the Child, in particular the right of children

to express their views (Article 12) and the best interests of the child (Article 3), reflected in the engagement of the SEND Youth Forum.

No adverse human rights impact has been identified.

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

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

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

Many children and young people with SEND experience more than one of the characteristics and circumstances considered above. The strategic decision to plan provision now — in anticipation of national reform and ahead of immediate demand pressures — is intended to benefit children with the most complex and intersecting needs, who are currently the most likely to be placed out of area or to have their needs unmet locally.

Two intersectional risk areas are of particular note. First, SEND and socio-economic deprivation intersect significantly: children from more deprived backgrounds are more likely to have their SEND needs identified at a later stage and may face greater barriers to accessing specialist provision, particularly where provision is distant or requires complex transport arrangements. The creation of local provision is expected to benefit this group disproportionately, but the Council must actively monitor whether uptake of new provision reflects the wider SEND population or concentrates in less deprived groups.

Secondly, SEND and ethnicity intersect in complex ways: national evidence points to differences in identification rates across ethnic groups and in the types of need identified, and some communities face greater barriers to EHCP assessment and to engaging with SEND processes. The Plan's strengthening of early identification, OAIP and the mainstream offer is intended to reduce these disparities, but this cannot be assumed and must be evidenced. The Council will

therefore monitor access to new provision by ethnicity and socio-economic disadvantage as a specific equalities duty.

The principal cumulative risk is not in the strategy itself but in implementation: that a phased, multi-year programme of new provision could, if poorly sequenced or communicated, leave some children with complex intersecting needs without suitable provision in the interim, or could create temporary inequity between those who can access new provision early and those who must wait. The use of independent and non-maintained provision in the interim, and the lead times of two to three years for new provision, make careful sequencing essential.

There is also a strategic risk attached to the changes at the Central Hub Brighton and the wider move away from large standalone Pupil Referral Units: children with SEMH needs are among the most vulnerable, and any transition in this provision must be managed so that no child loses access to suitable support during the change.

To mitigate this risk, the following specific measures are in place:

- A dedicated transition plan will be developed for the Central Hub Brighton covering the leadership model changes and any site changes proposed for 2026/2027, setting out how continuity of provision will be maintained for every child currently on roll.
- Individual children's support arrangements will be reviewed and confirmed before any site or leadership change takes effect, with the responsible SEND case officer and the child's family notified in advance.
- The Management Committee of the Central Hub Brighton, which includes Council officer and school representation, will maintain oversight of the transition and will report progress to the SEN Sufficiency Workstream.
- An Equality Impact Assessment will be completed in relation to any formal staffing or structural changes at the Central Hub Brighton before those changes are implemented.

What actions will be taken to mitigate negative impacts, advance equality of opportunity and foster good relations?

The SEN Sufficiency Workstream, with PaCC and partner representation, will maintain a strategic, intersectional view of need across the life of the Plan and will oversee the sequencing of provision so that the most complex needs are prioritised.

Each individual provision proposal will carry its own Equality Impact Assessment, which will assess intersectional impacts at the level of the specific children and communities affected, including transition arrangements for children moving from existing to new provision.

The changes will be managed so that any individual child's support is maintained through leadership transition at any site change.

Progress against the Plan, including the equitable distribution of its benefits, will be reviewed annually and reported through the Directorate's governance arrangements.

7. Action planning

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

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

SMART Action 1 — Equality Impact Assessment for each individual proposal

- A full, project-level Equality Impact Assessment will be completed for each individual provision proposal arising from the Plan — including each of the three Autism Resource Units, the further IIS expansion, and the changes at the Central Hub Brighton.
- Each EIA will be initiated at the outset of the statutory or engagement process for the relevant proposal, and will be completed and approved before any decision is taken.
- On the current programme: ARU proposals at Patcham High School and Cardinal Newman Catholic School — EIAs to be completed by autumn 2026; Stanford Junior ARU — EIA to be completed by spring 2027; Central Hub Brighton changes — EIA to be completed prior to any structural change, targeted by summer 2026.
- Each EIA will assess the detailed and intersectional impacts on the specific children and communities affected.

SMART Action 2 — Sequencing and prioritisation of provision and monitoring equitable access to any new provision

- Th
- The SEN Sufficiency Workstream will maintain and review, at least annually (by September each year, aligned to the annual SEND data refresh), a sequencing plan for the provision programme that prioritises children with the most complex and intersecting needs and minimises the period for which any child is without suitable local provision. The SEN Sufficiency Workstream is responsible for this action and will report progress to the Directorate Leadership Team annually.
- The sequencing plan will be informed by the annual data refresh.
- Access to new and expanded provision will be monitored by protected characteristic (in particular sex/gender and ethnicity, and by socio-economic disadvantage and care-experienced status) to ensure the benefits of the Plan are shared equitably.
- This monitoring is the responsibility of the SEN Sufficiency Workstream. Success will be measured by: the proportion of new provision places taken up by children from BAME backgrounds, disadvantaged backgrounds and care-experienced backgrounds reflecting, at minimum, their representation in the local SEND population; no statistically significant gap in access to new provision by ethnicity or socio-economic status emerging over the life of the Plan.
- A cause for concern (requiring escalation to the Directorate Leadership Team) would be if the proportion of new places taken up by any of the monitored groups falls more than 10

percentage points below their share of the SEND cohort for two consecutive annual reviews.

-
- Findings will be reported through the Directorate's governance arrangements.

SMART Action 3 — Accessible engagement and communications

- Engagement and communication on the Plan and on each individual proposal will be accessible to all affected groups.
- Materials will be provided in accessible formats and community languages, with translation and interpreting on request, and the views of children and young people with SEND will be actively sought.
- Feedback gathered from PaCC and other recognised representative bodies, through ongoing engagement, will be used as a qualitative monitoring tool to assess how the Plan is being received and whether its intentions are being realised in practice. This feedback will be reported to the SEN Sufficiency Workstream at least twice yearly and will inform the annual review of this EIA. The SEN Sufficiency Workstream is responsible for collating and reporting this feedback. A minimum standard for this action is that structured feedback from PaCC and Amaze is obtained and reviewed at least once in each 12-month period from the date of Cabinet approval of the Plan.

Which action plans will the identified actions be transferred to?

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

The actions in this EIA will be transferred to the SEN Sufficiency Workstream action log, the SEN Statutory Service Plan, and the Directorate Fair and Inclusive Action Plan (FIAP) for monitoring. Progress will be reported to the relevant Head of Service and to the EDI Team as part of FIAP performance reporting. The EDI Team will be notified and this EIA will be logged on the Directorate EIA Tracker.

8. Outcome of your assessment

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

Stop or pause the activity due to unmitigable disproportionate impacts because the evidence shows bias towards one or more groups.	
Adapt or change the activity to eliminate or mitigate disproportionate impacts and/or bias.	
Proceed with the activity as currently planned – no disproportionate impacts have been identified, or impacts will be mitigated by specified SMART actions.	X

Proceed with caution – disproportionate impacts have been identified but having considered all available options there are no other or proportionate ways to achieve the aim of the activity (for example, in extreme cases or where positive action is taken). Therefore, you are going to proceed with caution with this policy or practice knowing that it may favour some people less than others, providing justification for this decision.

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

The SEND Sufficiency Plan 2026–2029 is assessed as having a positive overall equalities impact. Its central purpose — to secure sufficient, appropriate and local provision for children and young people with SEND — directly advances equality of opportunity for the group that is its principal beneficiary, and supports the Council in meeting its Section 14 duty and the public sector equality duty.

The adverse impacts identified in this assessment relate principally to the implementation of the strategy rather than to its direction: the sequencing of a multi-year programme, the under-identification of autism in girls, and the equitable distribution of the Plan's benefits across all communities. These are capable of substantial mitigation through the actions set out above and through the individual, project-level Equality Impact Assessments that will accompany each statutory proposal.

The decision to plan now, in anticipation of national SEND and AP reform, rather than to wait for the reforms to be legislated, is considered proportionate given the immediacy of local demand pressures, the long lead times for new provision, and the risk of falling behind the national reform trajectory and missing capital funding opportunities tied to clear local plans.

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

The Equality Impact Assessment for the SEND Sufficiency Plan 2026–2029 concludes that the Plan has a positive overall equalities impact, by enabling more children and young people with SEND to access appropriate provision close to home, reducing reliance on out-of-area placements, and making explicit the Council's commitments under the Principles of Belonging and the Ordinarily Available Inclusive Practice guidance.

The assessment identifies a number of implementation risks — principally around the sequencing of new provision, the management of the Central Hub Brighton transition, the under-identification of autism in girls, and the equitable distribution of benefits — and sets out three SMART actions to mitigate them. Critically, each individual provision proposal arising from the Plan, including the three proposed Autism Resource Units, will be the subject of its own statutory process and its own full Equality Impact Assessment before any decision is taken.

Members are asked to have due regard to the equality impacts identified in this assessment, and to the mitigating actions proposed, when reaching their decision

9. Publication

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

10. Directorate and Service Approval

Signatory:	Name and Job Title:	Date: DD-MMM-YY
Responsible Lead Officer:	Rhianned Hughes, Head of SEN Statutory Service	
Accountable Manager:	Georgina Clarke-Green, Director Education and Learning	

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

EDI Review, Actions, and Approval:

Equality Impact Assessment sign-off

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

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

Signatory:	Name:	Date: DD-MMM-YY
EDI Business Partner:	Ololade Ajagun	30-JUNE-26
EDI Manager:		

Notes and recommendations from EDI Business Partner reviewing this assessment:

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

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Brighton & Hove City Council

Cabinet

Agenda Item 30

Subject: Adolescent Strategy 2026/29

Date of meeting: 16 July 2026

Report of: Cabinet Member for Children, Families & Youth

Contact Officer: Corporate Director Families Children & Wellbeing

Ward(s) affected: All

For general release

1. Purpose of the report and policy context

- 1.1 There has previously been a Complex Adolescent Strategy 2023-26 in place. The council has now been selected as one of the pilot areas for Young Futures Hubs and Youth Transformation. This has led to a need for a Local Youth Strategy, to support the National Youth Strategy. In addition, the Family First social care transformation has included the move of youth related services to merge with the existing Adolescent Service. This provides an opportunity for a more joined up offer for adolescents, from prevention to the more complex intensive support.
- 1.2 These events have led to the development of the 3-year Adolescent Strategy, which outlines end to end provision from the universal offer to the complex intensive work.
- 1.3 The Strategy is a partnership owned strategy and links to the Council Plan:
 - **Outcome 2: A fair and inclusive city** A city where people feel safe and welcome
 - **Outcome 3: A healthy city that helps people to thrive** A better future for children and young people. Developing our prevention and family support offer
 - **Outcome 4: A responsive and learning council with well -run services**

2. Recommendations

- 2.1 Cabinet approves the city's Adolescent Strategy 2026/29 and supports the activity detailed therein.

3. Context and background information

- 3.1. This Strategy outlines how services will be delivered for adolescents. This will include universal, preventative, targeted and intensive complex work. It is a partnership strategy, with governance arrangements through the Brighton & Hove Adolescent Partnership Board.

- 3.2. The vision is that every child and young person in the city will be supported to achieve their full potential, feel emotionally and physically well, and live safely within their families and communities. They will grow up free from exploitation and discrimination, able to live crime-free lives, and have meaningful opportunities to be heard and make a positive contribution to the society around them
- 3.3. The strategy contributes to the Council Plan, in particular in relation to making the city a health place where children can thrive; and a city where people feel safe.
- 3.4. The Strategy aligns to the council's ambition to be a learning organisation, embedding the learning framework to support delivery. Be connected - working closely with partners within the council and in the community, embedding our Community Cohesion roadmap. Be innovative and creative through the test and learn opportunities and healthy and psychologically safe. The Youth Justice Plan 2026-2029 sits below the Adolescent Strategy.

4. Analysis and consideration of alternative options

- 4.1 The Adolescent Strategy brings together the Young Futures Developments, The Youth Justice arrangements and the other relevant adolescent developments. This provides a joined-up approach to the support and services provided for Adolescents and their families in the City.
- 4.2 An alternative would be to continue to have a Complex Adolescent Strategy and to develop a separate Youth Strategy. This is not recommended as it does not reflect the joined up approach and offer we are aiming for.

5. Community engagement and consultation

- 5.1. There was a Local Youth Transformation Youth Services Review in November 2025. It found the following:

Youth participation is a rights-based approach that ensures young people influence decisions affecting their lives and communities and is essential to meaningful youth provision design.

Overview of Findings

- 5.2. Brighton & Hove has a developing but increasingly clear understanding of the needs of its young people, supported by multi-agency data from Family Hubs, Youth Justice Services, public health, and the voluntary sector. Analysis highlights significant geographical inequalities, particularly in East Brighton, Whitehawk, Moulsecoomb & Bevendean, and parts of Hangleton & Knoll. Mental-health need continues to rise, especially among young women and LGBTQ+ young people, and access to early help varies by neighbourhood. NEET rates remain concentrated in specific postcodes despite some improvement. Young people consistently value trusted adults, safe spaces, creative outlets, social connection, and practical support with financial literacy and life skills. Collaboration with Voluntary, Community,

and Faith Sector (VCFS) partners to deliver a comprehensive and diverse youth offer.

- 5.3. Brighton & Hove has a highly experienced and diverse voluntary sector, offering a strong portfolio of youth services across the city. The Youth Collective brings together a network of local organisations committed to collaboration, shared learning, and amplifying youth voice. This partnership model is supported by Brighton & Hove City Council (BHCC) and underpinned by a culture of trust and co-production, with joint approaches to quality, safeguarding and funding. The sector includes award-winning provision, such as Youth Investment Fund (YIF) projects, high-quality detached and outreach work, and access to state-of-the-art facilities like Brighton Youth Centre (BYC). A wide range of youth voice structures – including the Children in Care Council, Care Leaver's Forum, ensure meaningful participation and representation.

6. Financial implications

- 6.1 The Adolescent Strategy is a partnership strategy, and the partnership receives funding from a number of sources including the City Council, Public Health, the Police, OPCC (Office Police Crime Commissioner). There are also seconded workers from Probation, Health and Police.

There has also been recent investment in this area, including:

- Youth Transformation £0.500m (revenue) + £0.124m (Capital)
- Young Futures Hub £0.300m
- Violence Reduction Partnership £0.085m
- Turnaround £0.054m
- Remand Partnership £0.057m
- Reboot £0.026m
- National Referral Mechanism £0.030m
- 3 Yr Drug Strategy £0.390m

Name of finance officer consulted: David Ellis Date consulted: (03/07/26)

7. Legal implications

- 7.1 The local Youth Strategy is required in the context of the National Youth Strategy published by the government in December 2025, which drew on the experiences of over 14,000 young people. The strategy's primary focus is on youth policy, provision and support at a local, regional and national level across England for 10 to 21 year olds (up to 25 with special educational needs and disabilities). The national strategy provides that decisions and delivery must be made as close to communities as possible so that policies respond directly to young people's needs in their area. Young Futures Hubs are designed locally, with every area creating its own strategy based on the needs of young people in their community envisaged to provide access to youth workers and other professionals, supporting wellbeing ,career development and preventing harm.

- 7.2 The local strategy will assist the Council in delivering a range of statutory duties to the city's young people, including the promotion of wellbeing.

Name of lawyer consulted: Natasha Watson Date consulted :(19/06/26):

8. Risk implications

- 8.1 The success of the arrangement relies on strong partnership working. Therefore, change of policy or issues within partner agencies can potentially create a risk. This is mitigated by strong governance arrangements and partnership agreements.
- 8.2 There is a lot of interest at government department level on the progress of the Youth Futures Hub. They are very interested in the integrated arrangements we have in Brighton and Hove. It is therefore important to have an adequate strategic approach to avoid reputational damage.
- 8.3 The mitigation for this is the strong governance arrangements through the Adolescent Partnership Board. This is jointly chaired the Corporate Director Families Children & Wellbeing and the Director of Youth Work, Trust for Developing Communities.

9. Equalities implications

- 9.1 There is a Children's Family Help & Protection Anti Racist Action Plan in place, which the Adolescent Service is part of. The plan has three workstreams - staff support; practice with children and families; the voices of families, children and carers. Staff are becoming more confident about talking about race and significantly more examples of good practice is being seen in quality assurance audits. This is a journey and there is still more work to do.
- 9.2 The Young Futures Hub developments and existing Youth commissioning have specific grants to address equality issues, including Amaze, Allsorts and Impact Initiative. In addition, all providers are required to address this throughout all service provision.
- 9.2 Joint training between the Police and the Adolescent Service has supported the difficult conversations required to challenge and address examples of racism and to encourage better joined up work in this area. Performance data is regularly scrutinised by the Brighton and Hove Adolescent Partnership Board. There is disproportionality within the cohort of mixed heritage boys coming to the attention of youth justice professionals and this is an area of focus for the partnership.
- 9.3 The vision is that every child and young person in the city will be supported to achieve their full potential, feel emotionally and physically well, and live safely within their families and communities. They will grow up free from exploitation and discrimination, able to live crime-free lives, and have meaningful opportunities to be heard and make a positive contribution to the society around them. With one of the aims to ensure all support and services are inclusive, LGBTQ+ affirming and anti-racist.

10. Sustainability implications

10.1 No implications

11. Other Implications

Crime & disorder implications:

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

Public health implications:

11.2 Having suitable arrangements in place to meet the needs of adolescents, to divert children away from crime and anti-social behaviour and prevent reoffending, to support them with education and training opportunities and their emotional and mental health will likely have a positive impact on their wellbeing. A reduction in youth crime and anti-social behaviour will have a positive impact on community wellbeing.

12. Conclusion

12.1 The Adolescent Strategy 2026-29 has been developed and agreed by the Brighton & Hove Adolescent Partnership Board. Young people's voices have also been used to support the development of this strategy.

Supporting Documentation

1. Appendices

1. Adolescent Strategy 2026/29
2. Brighton & Hove Youth Justice Plan 2026-2029
3. Local Youth Transformation & Young Futures Hub Implementation Plan

Brighton and Hove Adolescent Strategy

| 2026-2029



"In an ideal world we would have the support there when we need it. We won't need to repeat our story over and again- we want everyone to connect and work together so we can be supported to be healthy and happy".

YOUNG FUTURES HUBS WORKING GROUP MEMBER, 16



BACKGROUND AND CONTEXT

Brighton & Hove is a city alive with energy, character and possibility.

Recently recognised by Time Out magazine as one of the top 50 cities in the world and among the top three destinations in the UK, our reputation as a welcoming, vibrant and creative place to live, work and visit continues to shine. This reflects what those of us who live and work here already know: Brighton & Hove is a city with a bold spirit, a strong sense of community and endless potential. It is a great place for people to grow up in.

We are proud to be the most active and walkable city in the country, a place where diversity is celebrated, independence thrives and our green spaces and iconic seafront offer room to breathe. Our thriving cultural life makes this a place young people can truly call their own.

Yet, like many cities, Brighton & Hove holds complexity alongside opportunity. While relatively affluent overall, significant pockets of social and economic deprivation remain. The city has one of the highest proportions of children living in house holds affected by substance use, mental health difficulties and domestic abuse.

Serious and violent crime is often linked to drug supply and exploitation activity, and the exploitation of adolescents continues to be one of the most urgent challenges faced by partners working across the city.

In recent years, Brighton & Hove has made important strides through its complex adolescent strategy, a coordinated approach designed to support our most vulnerable young people, including those affected by exploitation, substance use, offending or anti-social behaviour. The Youth Justice Plan sits beneath this framework, with a shared commitment to reducing first-time entrants to the criminal justice system, reducing reoffending and avoiding the use of custody wherever possible. This work aligns closely with the city's Drug and Alcohol Harm Reduction Partnership, ensuring our approach to supporting children and young people is holistic, integrated and informed by need.

This is also a moment of transformation. Exciting developments in youth provision, including the Young Futures hubs and a refreshed model of local youth services, are strengthening the foundations of support available to adolescents and their families. This will be delivered alongside the Families First Reforms which will work to ensure every family can access the right help and support when they need it, with a strong emphasis on early intervention to prevent crisis and improved outcomes for children and families. These innovations reflect our collective ambition: to build a city where all young people feel safe, included, supported and empowered to thrive.

This Adolescent Strategy brings together all of this work. It sets out a clear, shared vision for how we will protect, nurture and champion the young people of Brighton & Hove. Grounded in partnership and shaped by the voices of adolescents themselves, it represents our commitment to ensuring every young person, wherever they live, whatever their circumstances and whatever their aspirations, has the opportunity to flourish.

This strategy will use both the terms child and young people. It would be clearer to use one or the other, however we are looking to acknowledge the complexity. Most young people prefer the term young people, so we would be looking to respect this. However, it is also important at times to use language to remind people that we are working with children, particularly within the criminal justice system. We will therefore be using both terms depending on the context.

"Remember that young people are experts in their own lives - and their care should be focussed on the needs they've expressed"

YOUNG PERSON RUOK

VISION

Every child and young person in the city will be supported to achieve their full potential, feel emotionally and physically well, and live safely within their families and communities. They will grow up free from exploitation and discrimination, able to live crime-free lives, and have meaningful opportunities to be heard and make a positive contribution to the society around them.

AIMS

"Young People have more to say than you think, know more than you think and see the world in a different way to older people". YP 15

- Support for all young people, ensuring they receive the right support at the right time.
- Provide an accessible universal offer for all young people including opportunities to participate and influence.
- Ensure all support and services are inclusive, LGBTQ+ affirming and anti-racist.
- Deliver targeted support for young people at particular risk of substance use, offending behaviour, mental health challenges, or barriers to employment and education.
- Support young people experiencing extra-familial harm through a contextual safeguarding informed approach.
- Work collaboratively with partners to disrupt individuals or groups who exploit children and young people.
- Provide an intensive offer for the most vulnerable young people experiencing extra-familial harm.

"Working with teenagers can be hard as a lot of them are going to struggle to regulate their emotions and some might be easier to work with than others & don't take anything personal. I preferred it when I was spoken to like an adult not a child who didn't know what they were doing. It's also good to know one size doesn't fit all with the way a teenager might behave and different approaches need to be taken. They need to be listened to and not brushed off." 18 YR OLD

ADOLESCENT SNAPSHOT 2025/26



32

Children were First Time Entrants to the Youth Justice Service



527

Children were Not in Education, Employment or Training (as at 01/01/2026)



13,303

Children were in Secondary School education



5

Children were sentenced to Custody



3,573 (26.9%)

Children received Free School Meals



135

Children received T3 treatment from ru-ok?



45

Children had a RED RAG rating at AVRМ



547 (4.1%)

Children were excluded from School

VALUES

We believe children and young people should:

- Receive care, guidance and support whilst being allowed to make mistakes and learn in a safe, nurturing environment.
- Be heard and able to participate fully in their communities.
- Have a range of places where they feel safe and have a sense of belonging.
- Be empowered to be involved and included in planning and decision making around their safety and the safety of others.
- Have access to people who encourage safety, kindness and commitment in both their homes and communities.
- Be free from discrimination, be treated with respect and have equitable access to inclusive and representative services.
- Be able to safely access, enjoy and realise their aspirations through their education.
- Deserve to be happy and have fun.

In addition to the values, there is a strong commitment to anti -racist work, reducing disproportionality across the system and increasing meaningful participation, including the voice of the child. Delivery will therefore all be considered through these lenses.

"In recent years, young people have lived through covid lockdowns and experienced complex and stressful living arrangements - from which there was no easy relief or escape. Living with family members who aren't supportive can cause a lot of emotional strain, stress, anxiety and potential trauma for young LGBTQ people. Believing in whatever impact this will have had will be important to gaining their trust"

YOUNG PERSON, SPEAK OUT PROJECT



NEW DEVELOPMENTS

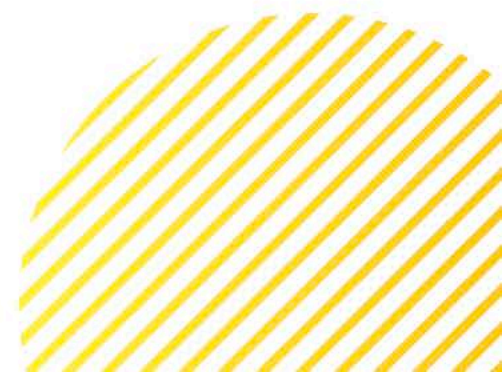
Brighton and Hove City Council has been selected to be an early adopter of the 3-year Young Futures Hub programme. The National Youth Agency facilitated a review of the youth service and city-wide consultation in 2025. This resulted in the development of a co-produced implementation plan for the city, which focusses on improving health and wellbeing, working with young people affected by violence and increasing access to opportunities for young people aged 10-18, 25 with SEND.

Brighton & Hove's approach to Families First is built on the model of relationship-based practice already embedded in Family Help and Protection, the Family Hubs, and now adopted by all partner agencies signed up to Brighton & Hove Safeguarding Children Partnership. Families First in Brighton & Hove will be an evolution of the model of practice that has led to an outstanding service for children and families in the city. The overall aims of Families First are to refocus the children's social care system on prevention and to ensure that there is a robust multi-agency child protection system in place. As part of this transformation, the youth related services will join the Adolescent Service and the introduction of Youth Keyworkers will enhance the preventative and targeted offer. This will ensure there is a spectrum of support, aiming to provide earlier support, thus reducing the need for complex and intensive support.

Alongside these developments, the Adolescent Service is working in partnership with the Skill Mill to provide young people (16+) in the youth justice system with paid employment, working on local environmental projects, with personalised support and training to help them build better prospects.

The Youth Justice Service is working in partnership with Sussex Police to implement the National Knife Crime policy (April 2026) across Sussex. The Government initiative includes increased police powers and technology, investment in schools (mentoring programmes) and timely and robust diversion pathways.

The Sussex Violence Reduction Partnership has funded the Focused Deterrence Scheme across the county, which provides a bespoke, evidence-based approach to reducing knife crime and serious youth violence. This involves Police and the Youth Justice Service working jointly with children and young people, providing intensive support alongside robust enforcement. The VRP has also funded custody navigators across Sussex to support children in Police custody. Schools are key partners and leaders alongside other partners in developing the best support for adolescents. We will continue to build relationships to ensure they have more influence over how policy and support going forward.



The youth keyworker will work with and in schools, utilising professional judgement in schools to influence decisions and to ensure practice in joined up.

We have successfully submitted a joint bid with East Sussex to develop a Regional Remand Partnership to reduce the need for remands to custody. Work will be ongoing to develop this offer.

STRATEGIC PRIORITIES

PRIORITY 1

Build a connected, preventative Youth System that provides accessible, joined-up support and growth opportunities for all young people.

PRIORITY 2

Promote young people's wellbeing and strengthen safety, belonging and protection across home, community and wider environments.

PRIORITY 3

Provide youth focused services that actively reflects and responds to the diverse identities ,cultures, and needs of the children and young people in our city.





GOVERNANCE

The Adolescent Partnership Board will provide the governance for this strategy.

This board also provides the governance for the youth justice arrangements of the city and the development of the Young Futures Hub.

It sits quarterly and is co-chaired by the Corporate Director for Families Children and Wellbeing and the Director of Youth Work for Trust for Developing Communities. All relevant statutory partners are represented at a senior level as well as a representative from the voluntary sector and a headteacher representative. There is work in place to develop the Board to ensure it properly represents the service users. These developments include work on the membership to reflect the community and to ensure there is meaningful youth voice.

DELIVERY PLAN OVERVIEW

Delivery on key priorities

The following activity will be focused on delivering the key strategic priorities:

UNIVERSAL

- City wide open access youth clubs, groups, services, youth voice forums, that form a core function of the externally commissioned youth offer, including Young Futures Hubs and Local Youth Transformation programmes



PREVENTION AND TARGETED SUPPORT

- Reboot and Turnaround provide voluntary interventions for children identified by Police due to anti-social and offending behaviour.
- SHIFT (AudioActive) As part of our early intervention offer, our partnership with AudioActive provides access to SHIFT, a six-month music mentoring programme for young people aged 11–17 at risk of serious youth violence and peer exploitation.
- Drug Alcohol and Sexual Health (DASH) Workers provide drop ins and 1:1 support in schools and colleges, offering advice on sexual health and substance use.
- Engagement and Support (EAS) Workers offer one to one support to children who are at risk of exploitation, youth custody or coming into care.
- Adolescent Service key workers in schools offer support to children at risk of experiencing extra-familial harm.
- The Liaison and Diversion Service (LDS) practitioners work with children in police custody to assess their individual needs and offer support and signposting.
- The Youth Justice Service Diversion Pathway provides Out of Court resolutions for children, including Outcome 22 (deferred prosecution).
- Externally commissioned Youth Service provide targeted clubs, groups, case work and mentoring opportunities. This includes Young Futures Hubs which will develop services with a focus on Health and Wellbeing, Opportunities and Youth Crime and Violence.
- Youth Support and Advice services, groups and drop-ins, including Young Futures Youth, Information, Advice, Counselling Services, (YIACS).
- The development of transition age clubs, groups and services for children aged 10-12 years who are transitioning from primary to secondary school.
- Young Futures Brighton Streets Detached city-wide youth work and youth bus offering youth work where young people spend time in the city.
- Development of Special Educational Needs and Disabilities (SEND) youth voice clubs, groups and youth voice pathways.
- AudioActive offer interventions that use music to support young people and communities to overcome challenges in their lives.
- Development of Integrated Care Board Health services within youth provision.
- Increased out of hours- after school and weekend youth provision via externally commissioned youth service.
- Hospital Youth Work offer support for children admitted to hospital where there are concerns around exploitation, violence and harm from drugs and alcohol.

INTENSIVE AND COMPLEX SUPPORT

- Tailored support for vulnerable children experiencing exploitation and youth violence, provided by skilled practitioners who work with children and families in a relationship and trauma informed way.
- AudioActive Shift mentoring music focused programme for young people.
- RUOK provide 1-1 support and guidance to young people at risk because of their drug or alcohol use.
- Advice, guidance and training for professionals working with young people affected by extra-familial harm.
- Adolescent Social Work specialise working in a trauma informed and relationship-based way with children and families impacted by extra-familial harm.
- Youth Justice practitioners provide intensive supervision, support, and holistic management of children subject to out of court and court disposals, including community and custodial sentences.
- Skill Mill - provides children in youth justice with paid employment, working on local environmental projects, along with personalised support and training to help them build better prospects.
- Local decision -making National Referral Mechanism (NRM) panel for children affected by exploitation.
- Development work with East Sussex to prevent remand to custody
- Adolescent Mental Health workers offering support and intervention to address young people's mental health needs.



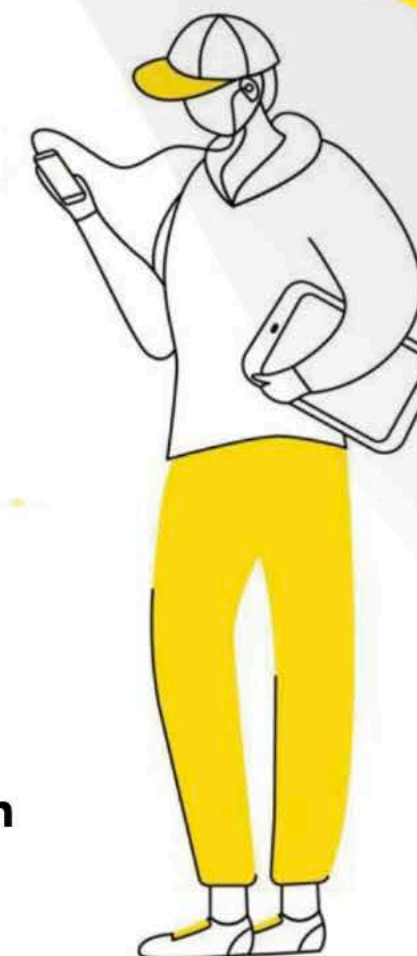
" We want the people who make decisions or have the power change things to involve us from the very start of their discussions. To make sure everyone is asked what they think make sure everyone is heard. Make sure everyone can have a role in making the decision. We have great ideas and our voices matter!"

YOUNG FUTURES HUB WORKING GROUP MEMBER, 17



YOUTH VOICE AND PARTICIPATION

- Citywide youth voice pathway development, providing accessible opportunities for all young people to lead on change, ensuring connected, clear routes from youth voice to decision-makers.
- Youth Participation Planning Tool (Lundy Model) implementation across Local Authority services working with children and young people.



APPENDICES

Youth Justice Plan 2026-2029 • Local Youth Transformation and Young Futures Hub Implementation Plan



PAYPR.org

AUDIOACTIVE

allsorts youth project



The Hangleton & Knoll Project
Working for a better community
CLG No. 7265039
Reg Charity No. 1139971



Trust for
Developing
Communities



Tarner
Children
Young People
Community

**Brighton & Hove
Young Futures Hubs**

impact
INITIATIVES

**Families First
Partnership**



**Sussex
Police & Crime
Commissioner**



**YMCA
DOWNSLINK
GROUP**



THE SKILL MILL



Brighton & Hove Youth Justice Plan 2026-2029

Introduction

Brighton & Hove is a city defined by energy, creativity and opportunity a place where young people can grow, contribute and shape their futures. Recognised as one of the UK's most vibrant and inclusive cities, it offers a rich cultural life, strong communities and an environment where diversity is championed and individuality thrives. For many children and young people, it is a place full of possibility.

However, not all young people experience these opportunities equally. Alongside affluence, the city faces deep-rooted inequalities that continue to shape the lives of some of our most vulnerable adolescents. Too many young people are growing up in the context of substance misuse, poor mental health, domestic abuse and exploitation. These factors increase the risk of harm, involvement in crime and contact with the youth justice system.

Youth justice in Brighton & Hove sits at the heart of this challenge and the opportunity. We know that contact with the criminal justice system is often a symptom of unmet need, trauma and vulnerability. Preventing offending, reducing reoffending and keeping children out of custody is not just a statutory responsibility; it is a shared ambition across the partnership to improve life chances and protect our young people from harm.

Our response is rooted in a strong and evolving partnership. The multi-disciplinary Adolescent Service, which includes the Youth Justice Service, brings together expertise across safeguarding, exploitation, substance use and edge of care to provide a coordinated response to those with the most complex needs. This integrated approach recognises that children involved in offending are often also victims and require a system that is collaborative, responsive and child-centred.

As a Young Futures Hub pilot area, Brighton & Hove is strengthening its commitment to early intervention and prevention, creating a more joined-up pathway from universal and targeted youth provision through to intensive support. This end-to-end model ensures that we intervene earlier, respond more effectively to risk, and sustain positive change for young people and their families.

This Youth Justice Plan sits within the wider Adolescent Strategy, owned by the Brighton & Hove Adolescent Strategic Partnership Board. Together, we are united in our ambition to:

- Prevent children from entering the criminal justice system
- Reduce reoffending through high-quality, trauma-informed practice
- Minimise the use of custody and support children to remain safely in their communities
- Address disproportionality and embed anti-racist practice across the system
- Ensure that the voices, experiences and strengths of children and young people shape everything we do

Fundamentally, this strategy is about more than reducing offending is about creating the conditions in which all young people can thrive. By working together, listening to young people and focusing relentlessly on what makes the greatest difference, we will continue to

build a youth justice system that is ambitious, inclusive and focused on hope, safety and opportunity.

Deb Austin, Corporate Director and Adam Muirhead, Director of Youth Work, Co Chairs of the Brighton & Hove Adolescent Partnership Board.

Governance, leadership and partnership arrangements

The Adolescent Service, incorporating Youth Justice, is situated within the Children's Safeguarding and Care division of the Families, Children & Wellbeing Directorate, enabling strong operational and strategic alignment with the wider system supporting children, young people and their families. The service is underpinned by a clear relational principle: to demonstrate consistent care and commitment to young people, even where their behaviours are challenging, and to maintain persistent efforts to engage those who are often the most disengaged. This is supported through reflective group supervision, enabling practitioners to explore and adapt approaches where progress is limited. The model promotes a child-centred, integrated approach that reduces the number of professionals involved with each young person, minimising repetition of their experiences and fostering stronger, trusted relationships. A welcoming and youth-oriented environment further supports engagement, with young people encouraged to spend time in the service and build positive connections with staff.

The service works proactively with the wider community to address contextual risks, including exploitation, for example through partnership work with local businesses such as hotels to provide advice and training. Recent developments have expanded the service's remit to include youth provision across the city, including leadership of the Young Futures Hub, enabling a more cohesive continuum from prevention and early intervention through to intensive support for complex adolescents. This approach strengthens collaboration with the voluntary and community sector and aligns with wider reforms, including Family First, to create a more joined-up and responsive system.

Governance and strategic direction are provided through the Adolescent Partnership Board, which has evolved from the former Youth Offending Service Management Board to reflect a broader focus on complex adolescents. The Board meets quarterly, is co-chaired at senior level, and includes representation from all key statutory partners, the voluntary sector and education. It retains a strong focus on youth justice, setting priorities, overseeing performance and ensuring continued development, with the Youth Justice Plan embedded within a wider Complex Adolescents Strategy. Leadership is further strengthened through representation at key strategic partnerships, including criminal justice, community safety, violence reduction and safeguarding boards, ensuring that the needs of this vulnerable cohort are championed and consistently framed through a 'child first' lens.

Partnership working is a core strength, with well-established and effective relationships across Police, Probation, courts and community organisations, enabling a coordinated and robust response to risk, public protection and safeguarding. Collaborative work with targeted

youth provision and outreach services supports prevention, desistance and positive outcomes. As a result, the Youth Justice Service is well regarded both internally and externally, benefiting from its structural integration within social care and alignment with social work practice, and is well positioned to respond to the dual demands of welfare and justice for children and young people.

5.1 Update on the previous year:

Progress on priorities in previous plan:

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

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

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

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

In 2025, the Adolescent Service completed a survey of young people around their ideas, thoughts and experiences of transitioning to adult services. Some of the young people surveyed had been open to YJS. This information will be used to inform conversations about planning to make adult drug and alcohol services more responsive to this population.

In the YJS, we are collecting feedback from children and their parents/ carers about their experiences of the Youth Justice system and the intervention/ support they have received from the service. A simple online questionnaire is linked to a QR code, so that children and parents/ carers can immediately access this via their phones and complete a response via email or text anonymously. Unfortunately, we have not had many responses from children, despite encouragement from their YJ workers to provide feedback. Children tend to provide verbal feedback during sessions but we wanted to provide an anonymous route for them too.

We seek children's views throughout and at the end of their disposals. In almost all cases, children express that the relationship with their Youth Justice worker is the most important aspect of their experience, and especially that they can trust their Youth Justice worker. To date, feedback from children about their YJ workers has continued to be very positive and they have shared that they feel listened to, supported and respected.

We continue to encourage children to participate by being part of interview panels for practitioners and managers. Children are provided with advice and guidance, are asked to write their own questions for candidates and encouraged to take a full part in the interview process. They contribute to scoring and discussions about candidates at the end of interviews.

Below are some quotes from young people and parents received in the last year, with all except one being collected from the anonymous online survey:

Child:

"its been helpful having someone to talk to outside of the home, especially with everything that has happened with my mum's health.... sessions have helped me to think about my responses a bit more. It was helpful to talk to someone about my moods and self- harming, even though it was uncomfortable".

Parent:

"[worker] consistently showed excellent insight, rapport and understanding. She built a genuine connection with our son, who takes a long time to trust new people and her calm, respectful manner made a real difference to him and us as a family. She has a rare ability to see the whole picture and to relate authentically to neurodivergent young people and their parents"

Parent feedback o YJ worker via email:

"[worker's name], you are one of a kind, you went above and beyond for my girl you listened to her and made her feel like her side of the ongoing issue was valued. For [daughter], this was key as the school was not listen to her when she was reporting what was going on and this is why she ended up lashing out and hitting the other pupil. Your time spent with [daughter] was very helpful. [MH practitioner] spent little time with [daughter] but also got her engaged and has helped massively. You are both a credit to your teams. I wish you both all the best."

Parent:

"My child has been lucky to have such an amazing YJ worker [name]. Its impossible to do justice to how life changing this has been for my son's outcomes. At a time when he struggled to see a future for himself, she gave him consistency, safety, enabled him to build trust in an understanding adult over a prolonged period...she has always gone above and beyond in being there for him and also help guide me as his mum supporting him."

Parents:

[To YJ worker from parent via text] "In the 4-5 years this has been going on, I can honestly say, you're the only one I have fully trusted and you've gone above and beyond"

From survey regarding YJS:

"very good, clear and consistent communication and support"

"staff members are helpful and explain anything you might not understand"

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

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

Following, joint training between the Police and the Adolescent Service to support the difficult conversations required to challenge and address examples of racism, we have continued to have open conversations with Police colleagues about the use of language, adultification and children's experiences of the CJS. We continue to share concerns about racism and disproportionality at strategic and operational levels. For example, we scrutinise the performance data, which is shared and discussed at the Adolescent Strategic Partnership Board. Where we see disproportionality within the Youth Justice cohort, we look at ways to examine and address this.

As part of the BHCC Anti-racist pledge, the Adolescent Service are committed to learning and development of best practice in anti-racism to improve outcomes for children and families and to creating a diverse workforce that feel safe and supported. Anti-racist practice is a regular agenda item for reflection and learning. The learning continues through the monthly Anti-Racist Forum, which involves learning across wider Children's Services, sharing best practice and discussions of topical issues affecting staff and local communities. More detail on disproportionality and measures to address this are included in the Performance section below.

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

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

The multi-agency thematic audit conducted by the Brighton & Hove Children's Safeguarding Board (BHSCP) identified some key strengths around partnership practices, effective systems and processes to safeguard children and the use of contextual safeguarding. It was acknowledged that even though the multi-agency arrangements and practice was strong, there remained inconsistency in the improvement of the lived experience for some of these

children. The findings of this were shared through a learning event. We will use these findings to inform and continue to develop the work in this area.

There is ongoing partnership work with Police in relation to ASB, vulnerability/ exploitation and children at risk of perpetrating serious violence and/ or carrying weapons in the city. For example via the Focussed Deterrence programme funded via the VRP. This uses the habitual knife crime index to identify children at risk of carrying knives and causing harm and ensuring they have appropriate intervention in place. There is a dedicated youth engagement worker who uses assertive outreach and positive activities to engage this cohort. All children are discussed in a multi-agency meeting, involving the Youth Justice Service, Police and key partners, such as Trust for Developing Communities (TDC), Access to Education, Community Safety and the Police Exploitation team.

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

- **To reduce First Time Entrants**

In the last year we have continued to strengthen partnership work with police and both statutory and voluntary partners to divert children away from the youth justice system. There has been a significant focus on prevention to improve the offer to children and their families and prevent the harmful impact of criminalisation. The results are starting to show in the performance data, with significant reduction in the number of FTEs in B&H.

The Adolescent Service is designed to enable appropriate support and intervention for vulnerable children and those coming to notice, and their families, with a range of services delivered by skilled and experienced professionals. The Youth Justice Service has established diversion pathways that respond to the needs of the child and family. Police referrals are triaged, with diversion pathways including specialist drugs diversion via ru-ok? substance misuse service, Turnaround and Reboot mentoring (further details below).

Children open to Youth Justice have direct access to services such as Family Functional Therapy, support from Psychologist & MH practitioners and Engagement & Support service (bespoke mentoring). We have continued to develop and strengthen the OOCR offer in partnership with Police (see section on diversion below).

There are regular pan -Sussex meetings with the local YJ areas and Sussex Police to ensure alignment of the Child Outcome Pathway across Sussex and share and develop best practice. We also conduct regular reviews of OOCR decision-making through the pan - Sussex Multi-Agency Scrutiny Panel, which brings local partners together to moderate decision-making across the county.

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

- **To reduce re-offending**

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

The Trauma Informed model is embedded into practice across the service, with specialist CAMHS practitioners attending reflective group supervision to support staff. In house MH practitioners also provide individual consultation, clinical supervision and advice. Youth Justice practitioners use the five Ps case formulation for assessing young people and have a good understanding of the children they work with. We have a strong partnership with the local F-CAMHS team, who provide forensic assessment, clinical consultation for staff and networks and direct intervention when violence and risk to others is a particular concern.

There is multi-agency oversight of young people who present a significant risk of re-offending and harm to others via the Adolescent Vulnerability and Risk Meeting. There is a strong partnership with local Police, with an experienced Police Officer embedded in the YJS and good relationships with the local Youth Policing team, which facilitates excellent information sharing and joint working.

In the last year, we have continued to develop the offer to victims and increase victim safety, in line with HMIP guidance and standards. Restorative practice is central to our practice and we strive to ensure victim's perspectives are included in planning and decision-making.

We continue to develop Transitions work in close liaison with the probation service. The current arrangement of a seconded Probation Officer in a split role, partly in YJS and partly in VERU (18-25 adult team) has significantly improved transitions for young people turning 18, providing continuity of relationships and access to adult services.

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

- **To reduce the use of custody**

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

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

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

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

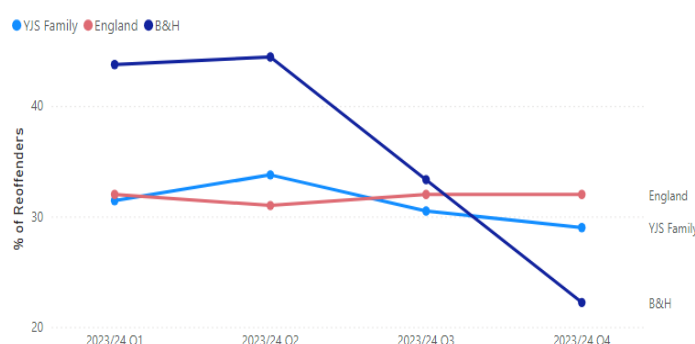
In respect of children being held overnight in custody, there is a protocol in place to prevent this wherever possible, which is monitored and upheld by Police.

Performance over the previous year:

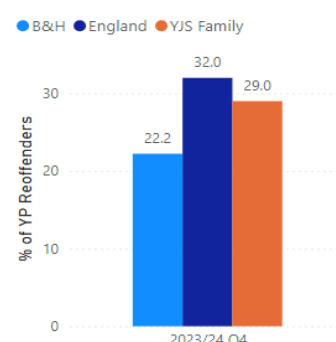
1. Re-offending rate

a) YJB quarterly comparative data:

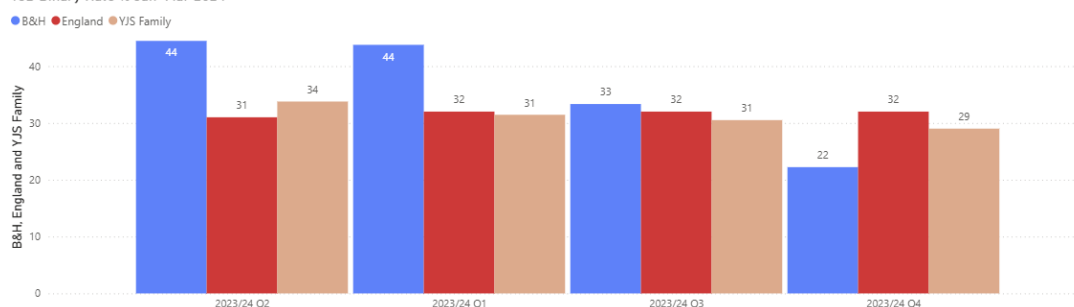
YJB Data B&H / England & Wales / YJS Family Average % of cohort who reoffen...



YJB Binary Rate % Jan-M...

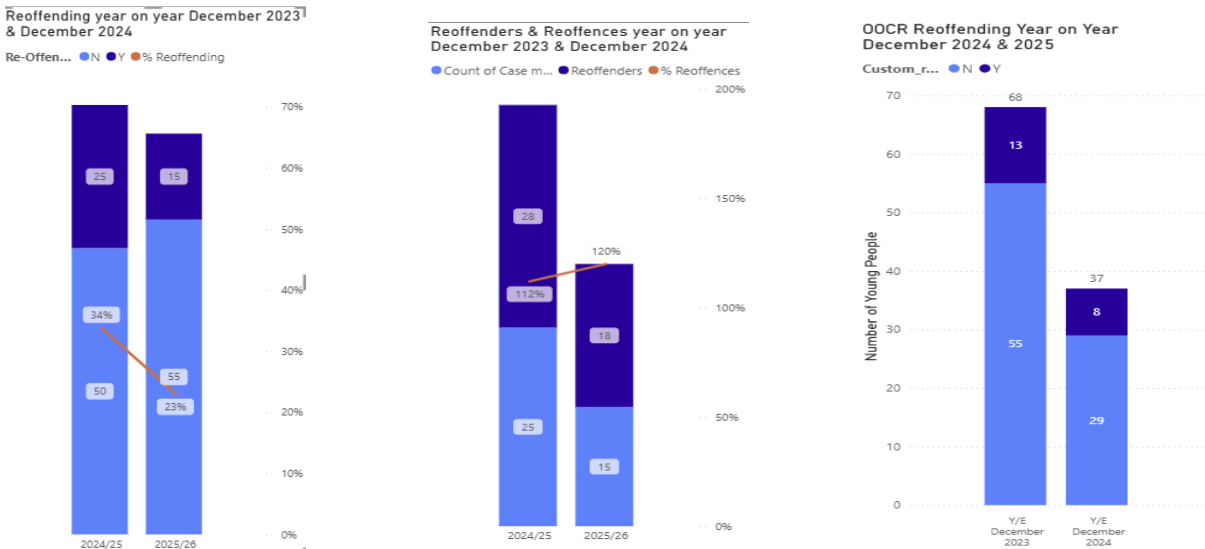


YJB Binary Rate % Jan-Mar 2024



The YJB data shows B&H re-offending rates have dropped below the national and family groups in Q4. The small cohort in B&H tends to produce vary variable re-offending rates, as a small group of re-offenders can have a disproportionate impact. However, the average rate for the whole year suggests a more sustained change, below:

b) Annual re-offending rates for B&H 2025-2026 (local data)

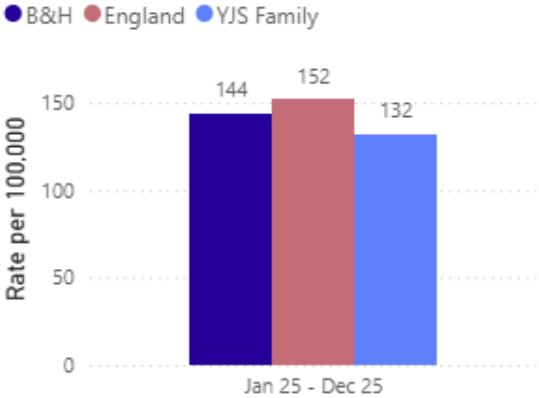


The re-offending (binary rate) for B&H (substantive outcomes) has significantly reduced compared to the previous year, from 34% to 23%, albeit the frequency rate has slightly increased from 112% (1.12 offences) to 120% (1.2 offences). The third chart above shows re-offending rates for Out of Court Resolutions (including cautions), which has slightly increased from 19% in 2025 to 21% in 2026.

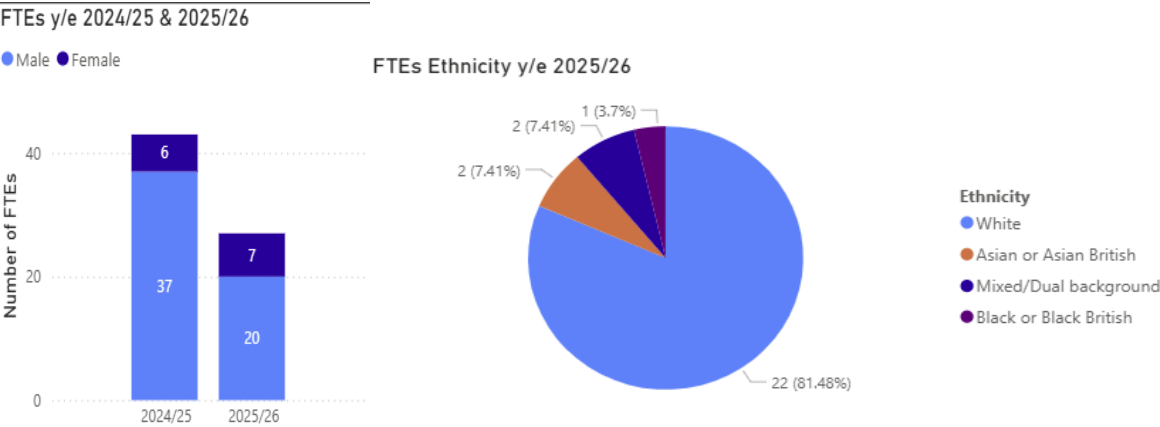
2. First Time Entrants

a) FTE rates: YJB comparative data

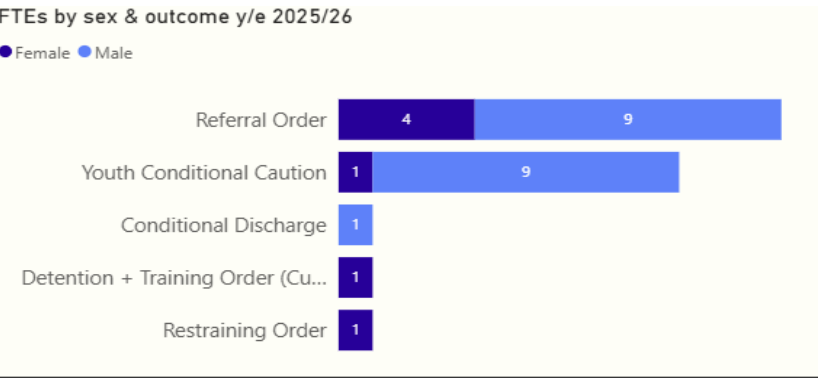
FTEs B&H / England & Wales / YJS Family
Average (rate per 100,000) for 12 Month
period ending 31st December 2025



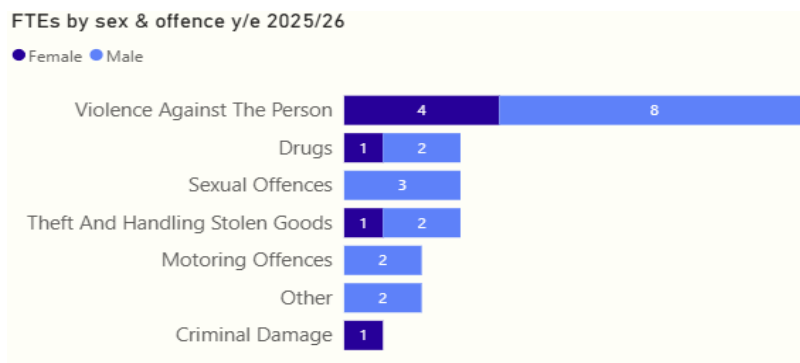
b) FTEs: Local data (annual) showing **gender and ethnicity**



b) Local FTE data: **Outcomes** with gender



c) FTEs offence type



There has been a significant reduction in FTEs in B&H over the past 3 years (over 50%), from 58 in the year ending 2024, to 41 in the year ending 2025, a reduction of 17. This has since dropped further, to **27 in 2025-2026**. Comparative data from December 2025, shows B&H is now below national numbers for FTEs but slightly above YJS family, however, the B&H rate has reduced further in Q4.

In terms of outcomes, 10 of the FTEs were **YCCs** and 14 were **Referral Orders**. Comparing the data to 2024-2025, the number of Referral Orders has reduced from **22 to 14** and the number of YCCs has reduced from **18 to 10**. FTEs also included a Restraining Order (this child not otherwise cautioned or convicted), a DTO (GBH S 18) and a conditional discharge.

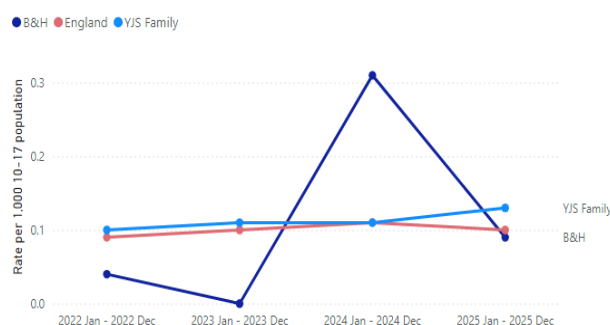
From chart (b), we can see that 22 (78%) of these children were white British and that Black and mixed heritage children are not over- represented in FTEs (mixed race children make up 10.4% of the school age population and Black children make up 2.1% of school age population from 2025 school census). Three of the children were dual heritage (10.71%), two were Asian British, with one being Black.

Chart (d) shows that Violence against the Person (including knife crime) remains the largest percentage in terms of offence types. Of these offences, five were knife related, including one for GBH with intent, one Threaten with a knife and three being simple possession. This is a significant reduction compared with 2024-2025, where there were 13 knife related crimes out of 21 violent offences.

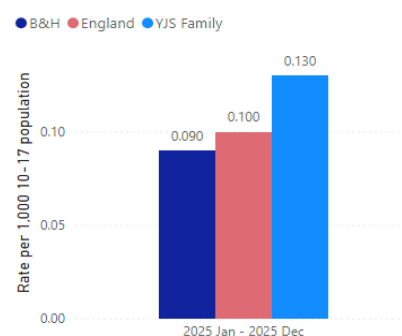
3. Custody

a) Custody rates per 1,000 of child population comparison:

YJB Data Custody Rates B&H, England & Wales and YJS Family Averag...

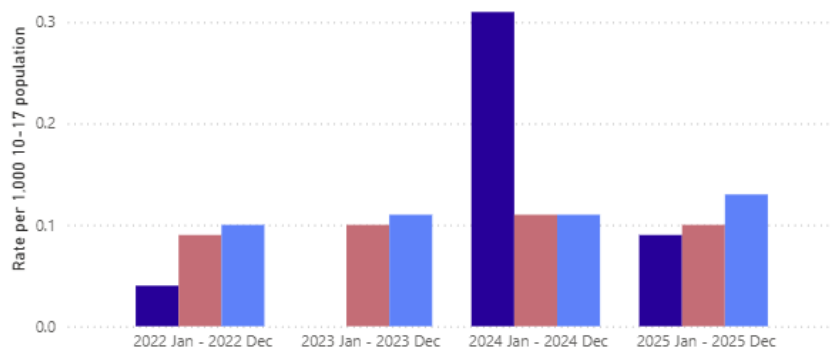


Custodial Sentences B&H/England...



YJB Data Custody Rates B&H, England & Wales and YJS Family Average (rate per 1,000 of 10-17 population) by rolling Year

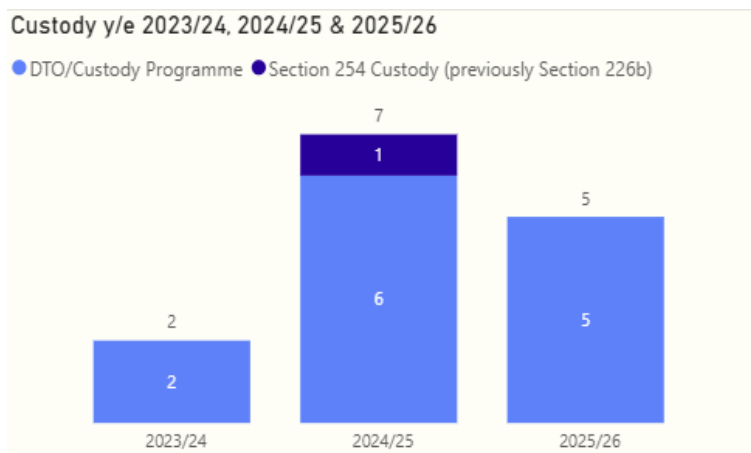
● B&H ● England ● YJS Family



https://app.powerbi.com/MobileRedirect.html?action=OpenReport&groupObjectId=116f54eb-b452-4d85-acc3-60100880afc4&reportObjectId=b5b50d2f-88c2-4e6e-8bd9-86d5168df4d0&ctid=989675fa-45e6-4b52-aa27-062757ad292d&reportPage=d8811cd2098d443df36a&pbi_source=copyvisualimage

As shown above, the B&H rate shows significant variations, which can be explained again by the small cohort. We have seen very low custody rates in 2022 and 2023, followed by a spike in 2024 and then a sharp reduction in the rate in 2025-2026. The custody rate is currently lower than national and YJS family averages, showing a decrease since 2024/25. This can also be seen in the local numerical data below:

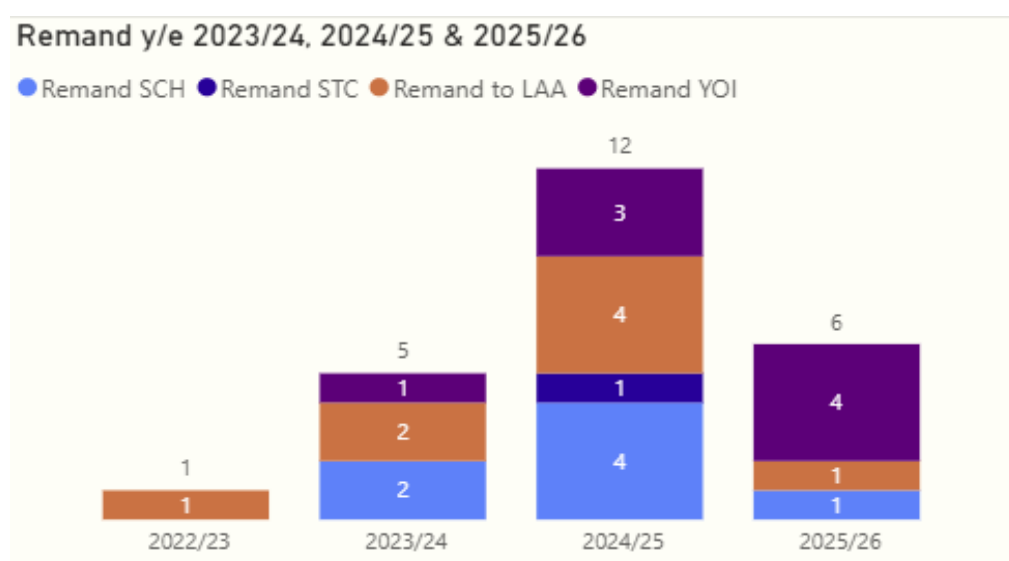
b) Local data: B&H custodial sentences over 4 years (there were *no custody cases in 2022/23*)



In the year ending March 2026, four children were sentenced to custody and one child was recalled due to breach of licence conditions. This compares to 9 custodial sentences (including one recall) relating to 7 children in 2025. Of the five children, one was a white female, one a black (African) male, one mixed race male and two white males. This shows significant disparity in the custody cohort, albeit the numbers of black and mixed- race children are very low (2). The children received custodial sentences for serious violent crime, such as GBH S18, ABH and repeated knife crime and in all cases, the risk to the public was considered high or very high.

The average use of custodial sentences in B&H remains low, well within our local target of less than 7 (children) per year being sentenced to custody.

b) B&H Remand data



Compared to 2025, there has been a reduction in the use of secure remands in the past year, with 5 Remands to Youth Detention Accommodation (RYDA) and one RLAA. The RLAA and secure remands relate to the same children that are in the custody cohort above, with one exception. They include one white female, one black male, 2 mixed-race males and one white male. In this cohort, the disparity is also stark, albeit relating to a small number of children being securely remanded.

All of the children remanded were assessed as posing high levels of serious harm to the community due to offences of GBH S 18, knife crime and violent crime (e.g. Robbery), in two cases, this was alongside repeated breaches of court bail conditions (the female was initially RLAA but repeatedly breached conditions). Four of these children were subject to a gang injunction and part of a particularly high- risk group of boys known to the YJS. There were also significant vulnerability and exploitation concerns around this group.

Of the 5 secure remands, all five resulted in custodial sentences.

Risks and issues

The main risks to the delivery of Youth Justice services relates to funding. Any reduction in the level of funding to the service would result in a reduction in the level of service provision

for this cohort. Reductions to funding to key voluntary sector partners is also likely to have an impact on this cohort as they provide additional support and provide desistance related activities. Families are also struggling with the cost-of-living crisis, causing more pressure on families. This management board is cognisant of these pressures and this is regularly discussed at Board in order to work together to find solutions, rather than retreating into silos.

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

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

Plan for the forthcoming year

Child First

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

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

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

The Youth Justice team are trained in and practice the ChildFirst approach. For example, trauma informed practice is embedded in Youth Justice work. Assessments include a case

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

Resources and services

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

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

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

Board development:

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

We have recently held a board development workshop to review the priorities and develop this plan. We also reviewed the arrangements and functioning of the board. It was agreed that going forwards the name of the board will change to the Adolescent Partnership Board. The meetings will have themed sessions each quarter, along with a case study which reflect the issues in the themes.

The Board also now provides the governance arrangements for the Young Futures Development. Going forward we will hold further planning opportunities to ensure the Board Members are clear on the expectations that this brings. We will also review regularly to ensure the delivery is joined up, while the focus on youth justice is not lost.

Workforce Development

Brighton & Hove is committed to the continuous development of staff through training, supervision, mentoring and coaching, to support staff progression and retention and continue to offer a high-quality service to children & families.

Youth Justice staff have mandatory BHCC training as part of their initial induction to the service and continuous development is tailored to individual needs via the Personal Development Plan. There are further opportunities for staff to learn through consultation, shadowing and co-working with partnership staff in the Adolescent Service. Learning is disseminated at team meetings, whole service events, from thematic audits and feedback from children, parents/ carers and victims and stakeholders.

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

Staff Induction

New staff have an induction for the first 4 weeks, including mandatory training, shadowing, peer mentoring, meeting partners and learning about the service. Senior workers take on the role of mentoring new staff, alongside their line manager, to provide additional support and practical guidance about the role. The induction will involve attending Adolescent Service team meetings, such as ru-ok?, EAS, Family Therapy team and the Adolescent social work team as well as visits to the wider service (FDFF, Family Hubs, local youth services), shadowing Youth Court and Diversion Panel and other relevant multi-agency meetings. New staff will have an induction programme organised by their manager, with a clear list of objectives and learning.

Ongoing Professional Development

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

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

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

The AMBIT model has been embedded across the service, with continuous training and development of staff and managers. Youth Justice staff have started to be involved in delivering AMBIT training and supporting others in the wider service to practice the model.

Below are some of the CPD inputs for the Youth Justice Team completed in 2025-2026 delivered through training events, group supervision, forums, service days and conferences:

- AMBIT within Adolescent Service
- Neurodiversity and ADHD

- Forensic CAMHS input: the nuances of neurodiversity, trauma and MH presentations.
- Child to Parent control & abuse
- Supporting parents of neurodiverse children
- Emotion coaching
- Substance Misuse and Young People
- Supporting Trans and gender
- Anti-racist Practice & Allyship (conference)
- Anti-racist forums
- Trauma informed practice for practitioners/ managers
- Motivational Interviewing
- Coaching for managers (senior workers)
- Working with refugees and migrant families

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

Supervision & Support

The Youth Justice Service provides weekly reflective group supervision as part of the Relationship -Based model to facilitate reflection and peer support. Individual line management supervision is also provided for each staff member every 4-6 weeks. Group supervision uses a reflective practice model to enable staff to explore issues, reflect on the impact and develop creative solutions. Discussions focus on stuck cases, immediate concerns or themes emerging from Youth Justice work (e.g. exploitation, working with girls & misogyny, peer relationships, MH complexities, etc.).

The trauma informed approach is used, including consideration of secondary trauma on staff working with children and victims. Individual supervision is focussed on staff development and support, with space for case discussion and oversight of complex or high- risk cases as required.

Managers have an 'open door' policy, whereby they are available to staff at all times for support and guidance. The senior YJ practitioners provide mentoring and support to less experienced staff and line manage the RJ and prevention workers.

Knife possession guidance

The knife crime policy is well established in Brighton & Hove, with close liaison and joint decision-making between Police and the YJS. There is a strong partnership with Sussex Police; we have built good relationships with the Youth Policing Team locally, with regular communication and contact through our seconded Police Officer and Youth Sergeant.

In respect of Out of Court Resolutions, knife possession guidance as outlined in the Child Gravity Matrix is followed, with a clear escalation route for any cases where deviation from the knife crime policy is recommended by the panel. All children referred to the YJS for knife crime are discussed at the joint decision-making panel, with oversight from the YJS manager and Police Sergeant. Where there is a recommendation for an informal disposal, the case is reviewed by the Youth Inspector, who will make the final decision. In line with the new knife crime guidance from April 2026, children will receive either a YCC or, in selected cases where it would be disproportionate to issue a Caution, an Outcome 23 would be given. The basis of decision-making is recorded in the panel notes, distributed to all relevant parties and recorded on the child's file.

Since the 2026 knife possession guidance, we have been working closely with Police to implement the new measures. The YJS is being notified directly by Police within 24 hours of a child coming to notice for knife crime and the consultation process is in place. For children being arrested for knife possession out of working hours, Sussex Police have opted to take appropriate action, such as making charging decisions, rather than bail to avoid unnecessary delays in processing children. Sussex Police have issued the following:

Knives and offensive Weapons

Sussex Police strictly follow NPCC guidance in relation to knife crime and offensive weapons [Knives and Offensive Weapons – See Pages 8 & 9](#)

Youth Justice service will accept offences where the following criteria is met

- Under 16 years old- unless exceptional circumstances exist for consideration of a YCC for 16/17 year olds
- No previous convictions or OoCR for knife/weapons
- No previous violent offending
- Offence fully admitted

All other cases that meet the evidential threshold must follow NPCC guidance and be charged or CPS advice sought

No comment but police found/witnessed- charge GAP

Admission- charge GAP

Denial regardless of who found- CPS NGAP

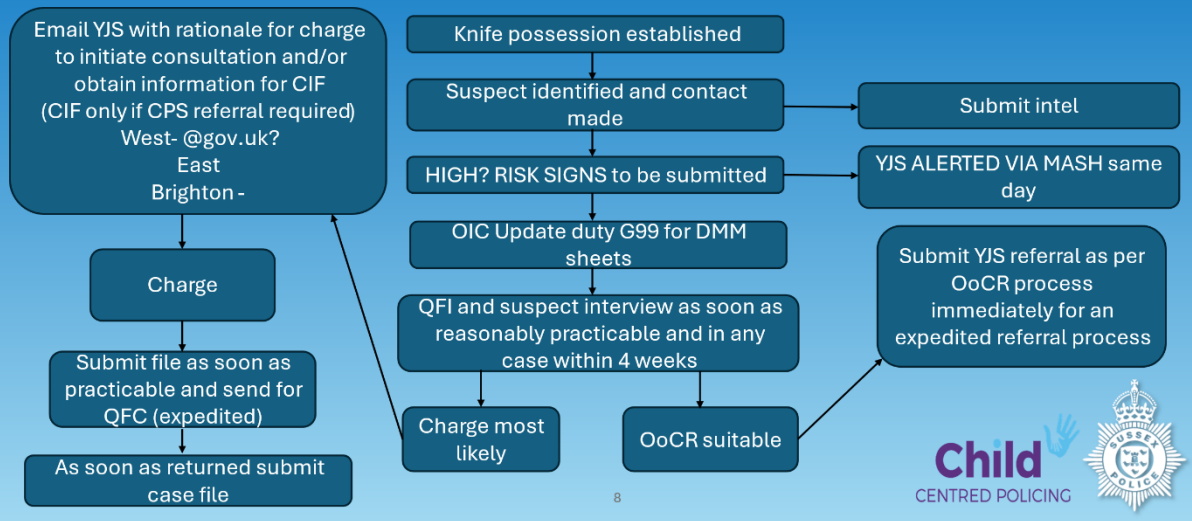
No comment and not police found/witnessed found CPS NGAP

No comment pathway is not available for knife or weapon offences



Knife crime- mock

The government introduced guidance that informed the following process which is mandatory for ALL knife possession only offences (excludes knife enabled crime). The main aim is to expedite investigations for the appropriate services to have intervention in place as soon as possible to maximise the reachable teachable moments and reduce further offending



Process issued to be followed from 1st April 2026:

- Initial notification from when child is identified and spoken to- SIGNS (which will have additional information boxes added) to be sent by MASH to the YJS group emails
 - Initial circumstances
 - Child's previous with police
 - Any relevant intel on child
 - Living circumstances if known
- Police to match 4 weeks action time to 4 week intervention time, which starts from point of OoCR referral or charge.
- OoCR referrals as per current process but to be sent immediately after interview- the YJS PCs will know to expedite referrals for knife crime.
- Immediately after interview, email to be sent to YJS inbox with child details and updated circumstances, which evokes consultation with OIC- to either discuss further and/or if matter for CPS, assist with Child Information Form.
- If still charge, Sussex Police expedite file building and checking to submit for court date.

Quarterly External Child Scrutiny Panel for Knife Crime and Out of Court Resolutions.

Sussex Police and the Youth Justice partnership have agreed that Out of Court decisions will be subject to formal external scrutiny on a regular basis through a new Multi-Agency Child Scrutiny Panel, formed in accordance with national guidelines (April 2026). The Child Scrutiny Panel will include an External Stakeholder group to promote transparency, consistency and accountability, where both knife crime outcomes and other Out of Court Resolutions will be reviewed. Terms of Reference have been developed for this child-focussed panel and meetings (starting July 2026) will be led by an experienced Independent Chair.

Cases are selected through a process where the Independent Chair chooses from a larger list covering the quarter. In each meeting, 12 cases, will be reviewed, with a 6/6 split between knife crime and broader Out of Court Resolution cases.

Evidence-based practice and innovation:

VR Knife Crime programme

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

We are currently reviewing the VR knife crime programme, through encouraging children and young people to provide feedback and participate in developing our knife crime intervention. A number of children and young people have expressed their views about the programme, with the majority feeling that it is a useful prompt for discussion. This is increasing engagement in the programme, as children and young people are asked their views and encouraged to think about what would work in preventing other children from carrying knives.

In previous evaluation, it was found that 75% of those completing the knife crime programme stated that they carried weapons due to fear of being seriously harmed in the community, believing that having a knife would protect them. The remaining 25% (15+ group) stated they carried a knife to prevent conflict or targeting by their rivals, believing if they had a knife that would de-escalate the situation. We have therefore placed specific emphasis in the programme on safeguarding, with the aim of re-educating children about the increased risk to themselves when carrying weapons.

Knife crime makes up a relatively small proportion of all offending in Brighton & Hove and in line with the national picture, the vast majority of weapons related crimes being simple possession. The number of crimes involving serious violence with weapons remains low.

VRP & Brighton Streets Project

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

behaviour through their intelligence gathering. In the external evaluation of the Brighton Streets project, evaluators heard directly from children and young people on how they had changed their behaviour as a result of the intervention.

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

Other developments:

The Focussed Deterrence Programme

The Sussex Focussed Deterrence programme, launched in 2025, is a multi-agency violence reduction programme that aims to reduce serious violence by identifying and directly engaging with a small group of children who are at risk of current or future involvement in knife carrying or knife-related harm. It combines clear, consistent communication about the risks and consequences of continued knife involvement with intensive, tailored support to encourage children to take up healthier and safer activities and opportunities. The overall aim is to reduce knife carrying, prevent harm, and strengthen protective factors like positive relationships, safety and engagement in education.

Brighton & Hove YJS have a full-time experienced Focussed Deterrence worker, supported by a senior YJ worker, who offers assertive outreach to children within a trauma-informed framework that focusses on positive activities and developing strengths and skills. They work alongside YJ practitioners and other professionals, as part of the network, to provide bespoke support to children as part of their multi-agency plans.

Children are identified predominantly using the Sussex Police Habitual Knife Carrier matrix and also via police intelligence, YJS practitioners, contextual safeguarding intel, etc. and discussed at monthly multi-agency meetings, such as AVRMS as well as via regular case management reviews to track progress. Each child will have a personalised support plan which can include mentoring, education/ training support, mental health, family support, substance misuse and safe recreation. Police involvement includes information sharing, and fair and timely enforcement if violence continues.

The project has been running for 6 months, so it is early days in terms of quantitative outcomes. However, so far children's engagement has been positive.

Sussex Custody Navigators Programme:

The Sussex Custody Navigators programme is a pan-Sussex initiative, involving Sussex Police and the three Sussex Youth Justice areas (East Sussex, West Sussex and Brighton & Hove) funded by the Violence Prevention Partnership. This will support children and young people aged 10 to 17 who are brought into police custody suites across Sussex (Worthing, Crawley, Brighton & Hove, Eastbourne & Hastings).

Navigators engage with young people at moments when circumstances may feel overwhelming, at a 'reachable, teachable' moment. These moments offer opportunities for guidance and support when young people may be most receptive to positive intervention. Navigators prioritise the welfare, rights, and safety of each child, ensuring that they are treated fairly and supported to learn, grow, and move forward.

Support is offered flexibly, either at the police station or afterwards in a safe, comfortable environment chosen by the young person. Navigators also coordinate with parents, carers, and existing professionals, such as YJS workers, social workers, or key workers, to ensure a joined-up approach to safeguarding and positive outcomes.

Through early engagement and targeted support, Navigators play a vital role in preventing further involvement with the justice system, promoting wellbeing, and enabling young people to make constructive choices.

Brighton & Hove YJS is currently recruiting for this post, which will be embedded in the YJS.

Priorities for the coming year:

The priorities of this plan align with those of the Brighton & Hove Adolescent Strategy 2026-2029. These were agreed at the Strategic Adolescent Board, and are 3 year priorities, as it was agreed that focus of these needed to be for a three-year period in order to have the time for the achieve the desired change.

The aims of the Adolescent Strategy are to:

- Support for all young people, ensuring they receive the right support at the right time.
- Provide an accessible universal offer for all young people including opportunities to participate and influence.
- Ensure all support and services are inclusive, LGBTQ+ affirming and anti-racist.
- Deliver targeted support for young people at particular risk of substance use, offending behaviour, mental health challenges, or barriers to employment and education.
- Support young people experiencing extra-familial harm through a contextual safeguarding informed approach.
- Work collaboratively with partners to disrupt individuals or groups who exploit children and young people.
- Provide an intensive offer for the most vulnerable young people experiencing extra-familial harm.

Alongside this, the core values are relevant. We believe that children and young people should:

- Receive care, guidance and support whilst being allowed to make mistakes and learn in a safe, nurturing environment.
- Be heard and able to participate fully in their communities.
- Have a range of places where they feel safe and have a sense of belonging.
- Be empowered to be involved and included in planning and decision making around their safety and the safety of others.
- Have access to people who encourage safety, kindness and commitment in both their homes and communities.
- Be free from discrimination, be treated with respect and have equitable access to inclusive and representative services.
- Be able to safely access, enjoy and realise their aspirations through their education.
- Deserve to be happy and have fun.

In addition, there is a strong commitment to anti-racist work, reducing disproportionality across the system and increasing meaningful participation, including the voice of the child. Delivery will therefore all be considered through these lenses.

The key priorities for 2026-2029 are as follows:

Priority 1 Build a connected, preventative Youth System that provides accessible, joined-up support and growth opportunities for all young people.

Priority 2 Promote young people's wellbeing and strengthen safety, belonging and protection across home, community and wider environments

Priority 3 Provide youth focused services that actively reflects and responds to the diverse identities, cultures, and needs of the children and young people in our city

Alongside these objectives, reducing re-offending, reducing first time entrants and reducing the use of custody will continue to be key priorities for the Youth Justice Service.

Delivery Plan Overview

The following activity will be focused on delivering the key strategic priorities:

Universal

- City wide open access youth clubs, groups, services, youth voice forums, that form a core function of the externally commissioned youth offer, including Young Futures Hubs and Local Youth Transformation programmes

Prevention and Targeted support

- The Youth Justice Service Diversion Pathway provides Out of Court resolutions for children, including Outcome 22 (deferred prosecution).
- Reboot and Turnaround provide voluntary interventions for children identified by Police due to anti-social and offending behaviour.
- The Liaison and Diversion Service (LDS) practitioners work with children in police custody to assess their individual needs and offer support and signposting.
- Hospital Youth Work offer support for children admitted to hospital where there are concerns around exploitation, violence and harm from drugs and alcohol.
- Adolescent Service key workers in schools offer support to children at risk of experiencing extra-familial harm.
- SHIFT (AudioActive) As part of our early intervention offer, our partnership with AudioActive provides access to SHIFT, a six-month music mentoring programme for young people aged 11–17 at risk of serious youth violence and peer exploitation.
- Drug Alcohol and Sexual Health (DASH) Workers provide drop ins and 1:1 support in schools and colleges, offering advice on sexual health and substance use.

- Engagement and Support (EAS) Workers offer one to one support to children who are at risk of exploitation, youth custody or coming into care.
- Externally commissioned Youth Service provide targeted clubs, groups, case work and mentoring opportunities. This includes Young Futures Hubs which will develop services with a focus on Health and Wellbeing, Opportunities and Youth Crime and Violence.
- Youth Support and Advice services, groups and drop-ins, including Young Futures Youth, Information, Advice, Counselling Services, (YIACS).
- The development of transition age clubs, groups and services for children aged 10-12 years who are transitioning from primary to secondary school.
- Young Futures Brighton Streets Detached city-wide youth work and youth bus offering youth work where young people spend time in the city.
- Development of Special Educational Needs and Disabilities (SEND) youth voice clubs, groups and youth voice pathways.
- Development of Integrated Care Board Health services within youth provision.
- Increased out of hours- after school and weekend youth provision via externally commissioned youth service.

Intensive and complex support

- Tailored support for vulnerable children experiencing exploitation and youth violence, provided by skilled practitioners who work with children and families in a relationship and trauma informed way.
- Youth Justice practitioners provide intensive supervision, support and holistic management of children subject to out of court and court disposals including community and custodial sentences.
- Skill Mill - provides children in youth justice with paid employment, working on local environmental projects, along with personalised support and training to help them build better prospects.
- Adolescent Social Work specialise working in a trauma informed and relationship-based way with children and families impacted by extra-familial harm.
- RUOK provide 1-1 support and guidance to young people at risk because of their drug or alcohol use.
- Advice, guidance and training for professionals working with young people affected by extra-familial harm.
- AudioActive Shift mentoring music focused programme for young people.
- Local decision -making National Referral Mechanism (NRM) panel for children affected by exploitation.
- Development work with East Sussex to prevent remand to custody

- Adolescent Mental Health workers offering support and intervention to address young people's mental health needs.

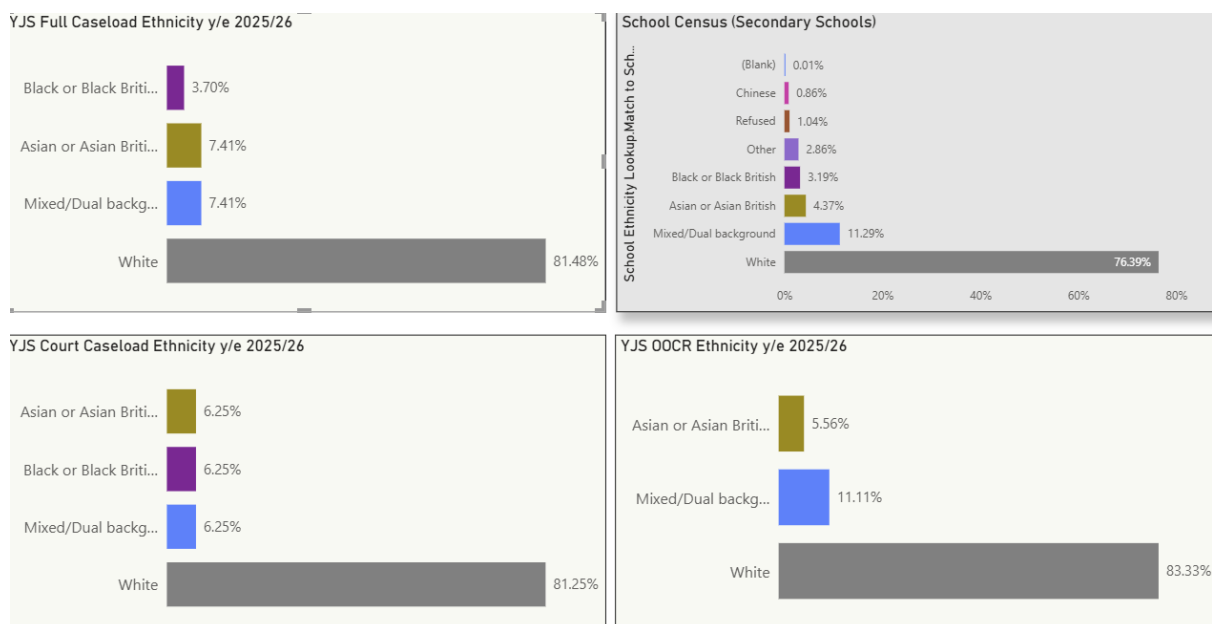
Youth Voice and Participation

- Citywide youth voice pathway development, providing accessible opportunities for all young people to lead on change, ensuring connected, clear routes from youth voice to decision-makers.
- Youth Participation Planning Tool (Lundy Model) implementation across Local Authority services working with children and young people.

5.3 National priority areas

Children from groups which are over-represented:

The 2025-2026 caseload data shows improvements in respect of disparity for B&H compared to the latest school census. 78% of the YJ cohort are white (76% in census), with no disparity showing for mixed race children and only very slight disproportionality for black children and Asian children. There is also less disparity for black and mixed-race children showing in the court cohort compared to the previous year.



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

Practice measures in place include the non-admissions diversion pathway, whereby children can be diverted without admitting to offences, where this is in line with the Child Gravity

Matrix for OOCR. Provided the child engages with the assessment process and are willing to complete intervention, they will receive an Outcome 22 (informal disposal). This is monitored by Police in terms of effectiveness and numbers of referrals across Sussex. Furthermore, The Outcome 23 deferred prosecution (Caution) pathway has been in place since January 2026. This further supports all children, including those with global majority backgrounds, to be diverted from the formal justice system.

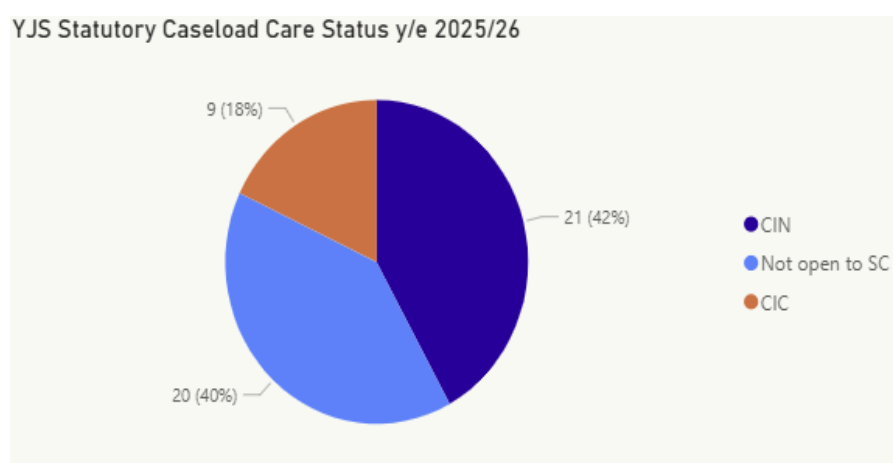
The anti-racist pledge includes challenging racism/ discrimination when this is experienced either from partners, staff, children or families in a way that is constructive, non-confrontational and facilitates learning. Any concerns and issues around racism can be referred for consultation to the PiC (Partners in Change) hub and / or the Anti-racist lead practitioner. This strategy is designed so that children who are within the Adolescent service receive a high-quality service and feel safe to talk about their experiences, that they are supported to be empowered and develop their skills and confidence. We seek feedback from Black, Asian, Arabic and mixed- race children on their experiences within the Youth Justice System and their views on what would improve things for them.

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

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

Children in Care

The chart below shows 9 Children in Care in the Youth Justice cohort for 2025-2026 including OOCR and court disposals. Two of these children were remanded to custody and one was RLAA, with the rest S 20 accommodation.



In B&H we remain committed to reducing the numbers of Children in Care (CiC) entering the Youth Justice and continue to work jointly with Police to ensure that CiC are not unnecessarily criminalised. We have an agreement with Sussex Police via the pan- Sussex

Joint Policy to Reduce Criminalisation of Children in Care and CiC status is taken into account in decision-making at Police level, the OOCR Diversion Panel and at Court (highlighted in Court reports). CiC in the Youth Justice caseload data is regularly monitored and shared with the Board, which unfortunately continues to show some disproportionality for this very vulnerable cohort.

Policing:

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

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

Following a joint Review of the Gang Injunctions with the Adolescent Service and senior Police decision-makers relating to a particularly high risk group of young people, close communication and regular meetings have been established for information sharing, planning and joint safety management in relation to serious youth violence in the community. This process has been a development of partnership work and effective safety planning by learning from previous experiences and identifying missed opportunities. This has facilitated the development of relationships and greater understanding and trust between partners, involving frontline YJ practitioners, Police and social workers.

The Youth Justice Service has a full time Police Officer seconded to the Youth Justice, with a split role focussing on Out of Court work as well as oversight of children whose offending is prolific and high-risk to others. We have a dedicated and experienced Police Sergeant (not seconded) who oversees decision-making at the OOCR panel and promotes child centred policing in the force. There is also a Youth Inspector for Sussex OOCRs and a B&H appointed Youth lead inspector, who has oversight for Focussed Deterrence. The Police sergeant manages the Youth Policing team in B&H and there is close working and communication between the YJS PC, sergeant and Youth Policing team, who advise of daily arrests and share information about children coming to notice.

Prevention

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

The Early Intervention Meeting has continued to bring together local partners involved in crime prevention, including Youth Policing team and NPT, Community Safety and

Exploitation team, Trust for Developing Communities and Youth hubs, BCRP (Brighton Crime Reduction Partnership) and YJS to identify children involved in ASB and offending and ensure there is an appropriate response.

Reboot

Sussex Police have commissioned the three Youth Justice services, Brighton, East Sussex and West Sussex to deliver prevention work via Reboot mentoring. The success of this work from 2024 has led to increased targets and PCC funding for Brighton YJS to deliver the project. Reboot is delivered to increased numbers of children via experienced EAS (Engagement & Support) workers. This partnership arrangement brings crime prevention services under the Adolescent Service, so that children can access services appropriate to their needs.

Drugs diversion via ru-ok?

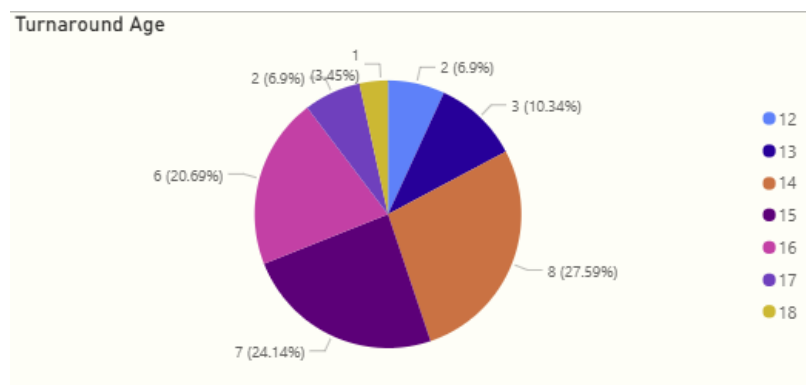
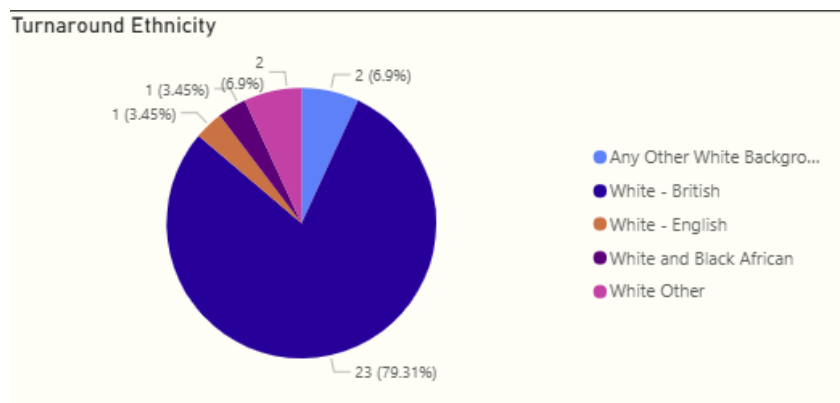
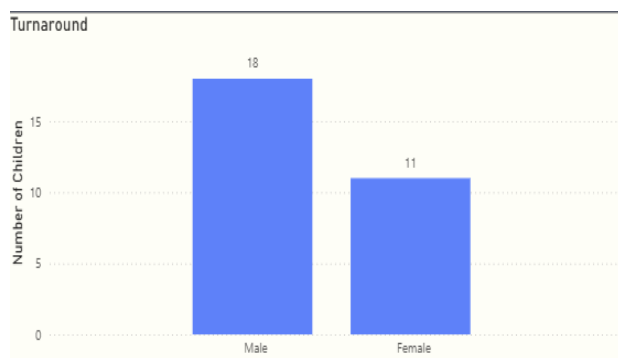
Within the Adolescent Service, the ru-ok? substance misuse service offer a point of arrest pathway via Police and Sussex Liaison & Diversion Service. ru-ok? also have skilled practitioners based in secondary schools in B&H, who offer a more informal drop-in service to children with advice about drugs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

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

Turnaround

The partnership with TDC (Trust for Developing Communities) has continued into 2026 following the confirmation of MoJ funding in March 2026. Given the longer- term funding commitment, we have plans to develop the Turnaround programme, with a full- time dedicated youth worker from TDC who will be embedded in the YJS. The partnership with TDC, FDFF, Reboot and Police has enabled us to identify and target children at risk of offending and ASB, gain a better understanding of particular localities where children are at risk and offer bespoke programmes. Below is a breakdown of the Turnaround cohort by gender, age and ethnicity.

Children opened to Turnaround April 2025 to March 2026



Diversion:

Brighton & Hove YJS operates under the pan-Sussex Joint Out of Court Resolution (OOCR) protocol. The Child Outcome pathway is well established in B&H and there is consistent partnership and joint working with Police to divert children from prosecution wherever possible and appropriate. The Child Gravity Matrix has been fully implemented across Sussex and adherence to policy and guidance.

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

Children subject to both formal (YCC) and informal (CRs/ Outcome 22) out of court disposals are offered a comprehensive programme of intervention based on the assessment including safety concerns. They can access wrap around support and provisions of the Adolescent

Service, including intensive family therapy, 1:1 emotional & mental health support, tier 2 or 3 substance misuse service and outreach support from the Engagement and Support Service (EAS), which specialises in working with children affected by exploitation. In addition, they can access support with their education/ schooling via the Adolescent Education Advisor, or advice with Education, Training & Employment through the local Youth Employability Service (YES). Engagement with OOCRs is high, with very few cases being returned to Police for enforcement.

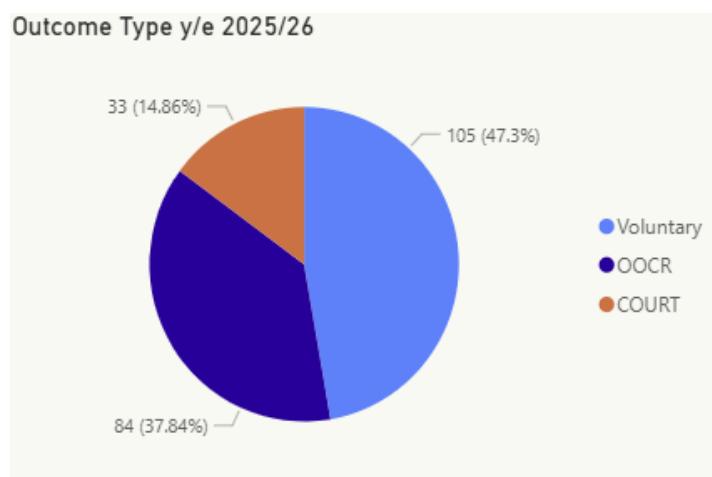
Outcomes for children are overseen via the pan- Sussex Multi-agency Scrutiny Panel, which is being developed with Police to focus solely on outcomes for children, as opposed to being part of the adult process.

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

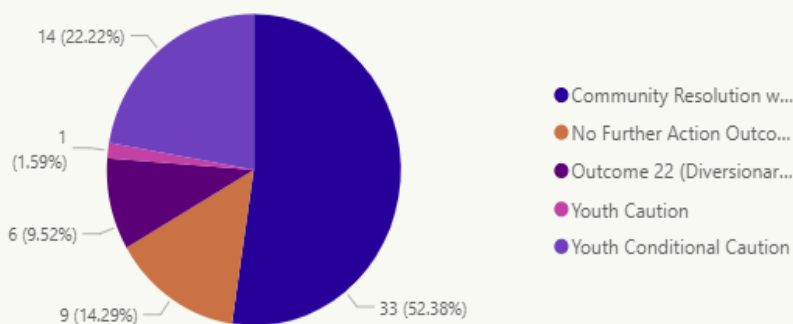
As shown in the charts below, children accessing prevention and diversion programmes make up a large proportion of the B&H Youth Justice cohort. Almost two thirds (62%) of all Out of Court Resolutions are informal outcomes, including CRs (52%) and Outcome 22/23. Since the previous year, we have seen an increase in the use of informal disposals compared to Cautions (previously 50% of all OOCRs). The data demonstrates that children are receiving better outcomes through the OOCR process.

Voluntary programmes shown in the chart below include Reboot, Turnaround and Immediate Justice (Police CR + Reparation).

Prevention and Diversion local data 2025-2026



OOCR y/e 2025/26

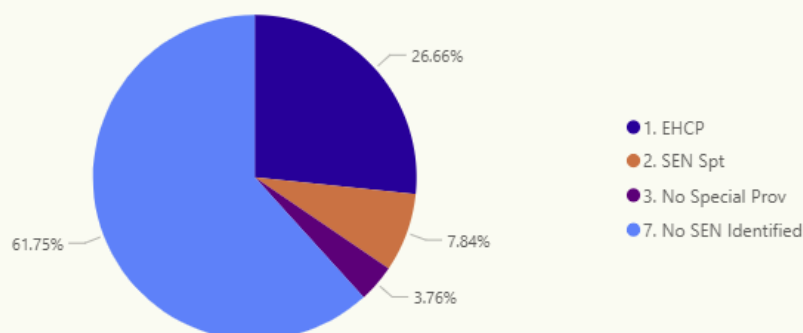


Education

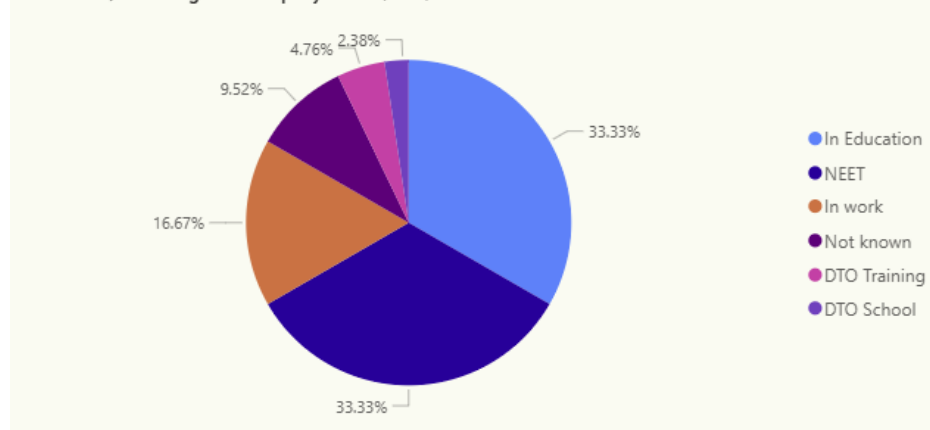
The Youth Justice Service has strong links with Education providers in the city through representation both on the Adolescent Strategic Management Board and at the Adolescent Vulnerability and Risk Management (AVRM) meeting. The former has both the Access to Education Manager and a Secondary School Headteacher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

The Adolescent service includes an Education Advisor role, who acts as a conduit to all secondary schools in the city, meets regularly with the Education Adviser for all children with a Social Worker from the Virtual School and is part of the BAP which meets twice monthly. They also attend the joint agency suspension and exclusion meetings which strategically manages the reduction of suspension and exclusion across the city.

SEN 2025/26



Education, Training and Employment (ETE) 2025/26



Data taken from ChildView Youth Justice cohort 2025-2026, including court and out of court disposals, shows that 34% of children in the YJ cohort have special educational needs identified. This continues to be closely monitored at quarterly board meetings. The data also shows that a third of 16-17 year olds (relating to 13 B&H young people) were NEET, which is an area we are focussing on for 2026-2029. It is perhaps relevant that the current cohort of 16-17 year olds are the year groups particularly affected by the Covid lockdown in 2020-2022, with some children not returning to school at all, missing their whole secondary education. This, along with austerity, has compounded the difficulties of attaining ETE for our most vulnerable young people.

Plans to address this include the commissioning of Skill Mill in Brighton & Hove, a programme that provides paid employment with coaching and intensive support for NEET 16-17 year olds in the Youth Justice cohort alongside their intervention programmes. Young people will also receive personalised support from employment and education advisors for up to 9 months where needed to support them to attain paid employment or further training following the programme. It is hoped that this will provide accessible opportunities for young people who may otherwise struggle to attain employment. We also have strong links to the Youth Employability Service (YES) who work with young people from 16-19 years and provide flexible and pro-active support to young people around further education, training and employment.

Restorative approaches and victims

The YJS has a strong commitment to Restorative Justice practice and ensuring the victim's voice is heard. The partnership with Police at strategic and operational levels supports Youth Justice work in this respect, for example, commitment of a full time PC embedded in the YJS, a quarterly multi-agency OOCR scrutiny panel and close links to the Restorative Justice Police team. All Youth Justice staff are trained in Restorative Justice practice and there is close management oversight of RJ and victim work. In 2025, we recruited a Restorative Justice Co-ordinator, who is overseeing the continued development and improvement of restorative practice in the YJS. We have a victim liaison worker and a reparation worker who are both experienced and trained in RJ.

In the past year, we have focussed on developing the RJ offer, using feedback victims, community reparation projects, staff and young people. We are currently reviewing the offer

to victims to ensure our practice is in line with the HMIP standards. There is oversight of victim work and data from the PCC.

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

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

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

Serious violence, exploitation and contextual safeguarding

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

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

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

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

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

Much progress has been made in the five years since the inception of the VRP, and sustaining this momentum remains a priority for the partnership. This involves all partners

working together to embed the response to serious violence in their day-to-day organisational delivery.

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

Detention in police custody

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

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

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

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

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

Use of custody and constructive resettlement:

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

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

The YJ workforce are qualified and highly skilled, with the expertise to manage children presenting a high level of risk to others in the community in liaison with partners. There is good collaboration with Police and regular multi-agency oversight via Op Safety and AVRМ. For example, all children assessed as presenting a high level of risk to others are discussed at the Adolescent Vulnerability and Risk Meeting (AVRM), a weekly multi-agency forum with a focus on Exploitation. Risk management and safety plans receive multi-agency and HoS oversight.

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

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

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

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

Working with families

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

Within the Adolescent Service, there is an experienced and trained team of family therapists, who offer Family Functional Therapy (FFT) to all families in need. This offer is focussed on preventing children entering care or custody by strengthening parent-child relationships and building resilience within families. The model is proven to help reduce offending behaviour by giving children more stability and attachment to their families. The pathway to FFT is via Front Door for Families or Children's social work, with families screened for specific criteria, which include children coming to notice of police, exploitation concerns and family breakdown. The FFT team have been co-located with Youth Justice since prior to the 2018 restructure of the service, so there are well established relationships between Youth Justice and FFT, at both management and practitioner level. The FFT manager attends weekly AVRMs (exploitation & risk) meetings and Adolescent Service manager's meetings, so has oversight of the most vulnerable children and young people in B&H. FFT practitioners have attended YJ team meetings to provide training and advice. Overall, this ensures that family therapy is well understood in the service and accessible to families meeting the criteria.

Signed

Designation

Date

Glossary

ABH- Actual Bodily Harm

AMBIT- Adaptive Mentalisation Based Integrative Treatment

AQA

ASB- Anti-social Behaviour

AVRM- Adolescent Vulnerability and Risk Meeting

B&H- Brighton & Hove

BAP- Behaviour & Attendance Partnership

BHCC- Brighton & Hove City Council

CAHMS- Child and Adolescent Mental Health Services

CiC- Child in Care

CME- Children Missing Education

CPD- Continuing professional development

CPR- Childrens Placement Team

CR- Community Resolution

CSE- Child sexual exploitation

CV- Childview

DJ- District Judge

DTO- Detention and Training Order

EAS- Engagement and Support

EDS

ETE- Education Training Employment

FCAHMS- Forensic Child and Adolescent

MH - Mental Health Services

FCW – Families, Children & Wellbeing

FDFF- Front Door For Families

FFT- Functional Family Therapy

FTE- Full Time Equivalent

GBH- Grievous Bodily Harm

HMIP- His Majesty's Inspectorate of Prisons

HMYOI- His Majesty's Young Offender Institution

HoS- Head of Service

JAG- Joint Action Group

KPI- Key Performance Indicators

LGBTQ+ - Lesbian, Gay, Bisexual, Transgender, Queer or Questioning, Intersex, Asexual, and more.

MASH- Multi-Agency Safeguarding Hub

MH- Mental Health

NEET- Not in Education Employment Training

NHS- National Health Service

NRM- National Referral Mechanism

OOCR- Out of Court Disposal

OPCC- Office of the Police and Crime Commissioner

PACE- Police and Criminal Evidence

PC- Police Constable

PDP- Personal Development Planning

PiC- Partners in Change

PO- Probation Officer

PSR- Pre-Sentence Report

PTSD- Post Traumatic Stress Disorder

QA- Quality Assured

RJ- Restorative Justice

RLAA- Remand to Local Authority Accommodation

RO- Referral Order

ROTL- Release on Temporary Licence

RYDA- Remand to Youth Detention Accommodation

SAVRY- Structured Assessment of Violence Risk

SV

SW- Social Worker

TDC- Trust for Developing Communities (

VR- Virtual Reality

VRP- Violence Reduction Partnership

YC- Youth Caution

YCC- Youth Conditional Caution

YCS- Youth Custody Service

YES- Youth Employability Service

YJAF- Youth Justice Application Framework

YJS- Youth Justice Service

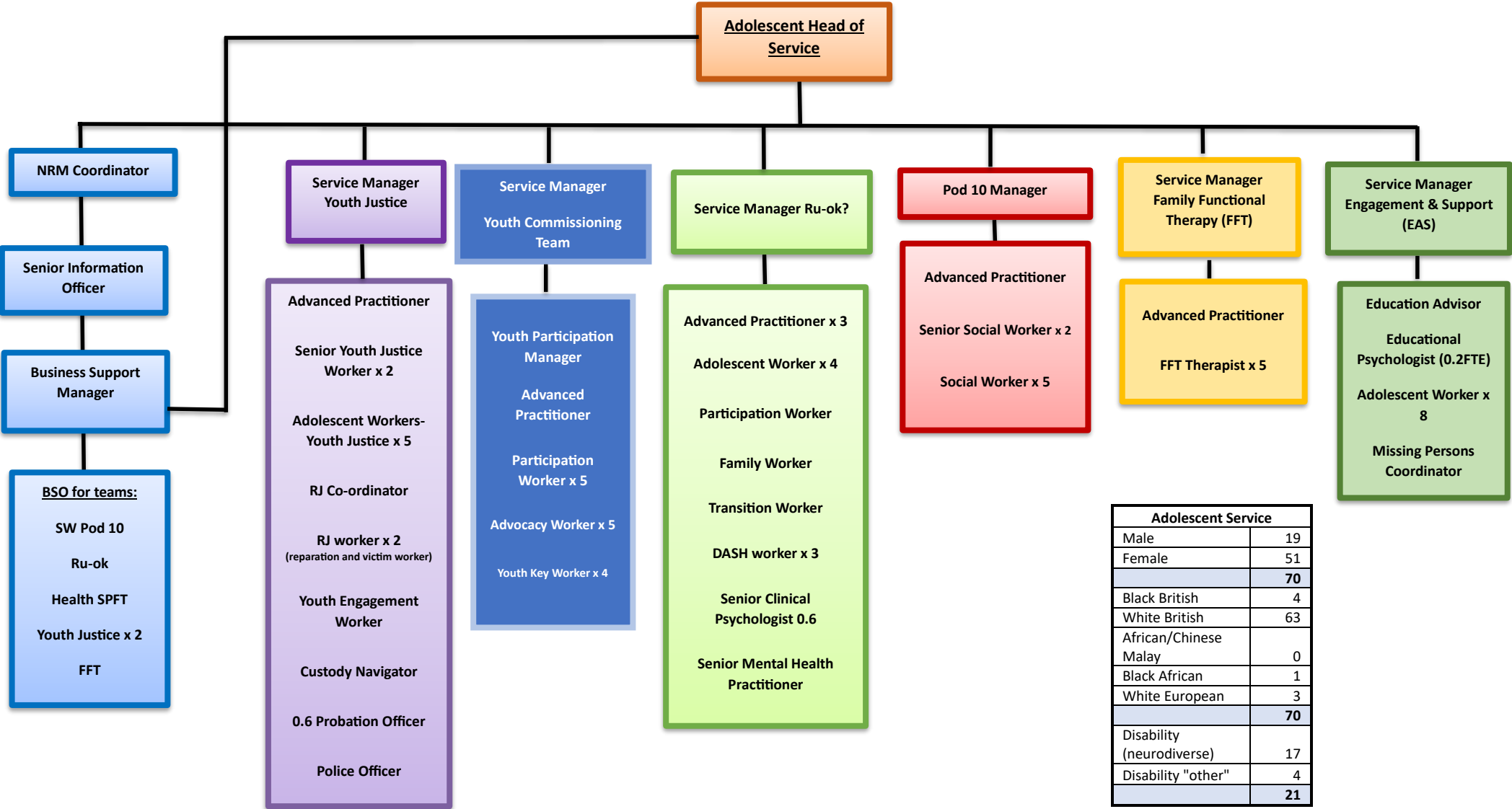
YOS- Youth Offending Service

YRO- Youth Rehabilitation Order

Appendix 1: Staffing Structure

Brighton & Hove Adolescent Service Structure Chart June 2026

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Adolescent Service	
Male	19
Female	51
	70
Black British	4
White British	63
African/Chinese Malay	0
Black African	1
White European	3
	70
Disability (neurodiverse)	17
Disability "other"	4
	21

Appendix- Young Futures Hub and Local Youth Strategy Overview

Young Futures Hubs 2026-2029

Aims to bring services together to improve access to opportunities and support for young people at community level.

Each YF hub designed locally to meet three outcomes:

- increasing opportunities
- improving mental health and wellbeing
- reducing crime

Brighton and Hove City Council has been selected to be an early adopter of the Young Futures Hubs programme and to also link with the Local Youth Transformation one year funding 2026/2027 to transform the youth service and respond to recent review report recommendations.

Young Futures Hubs Implementation Plan

11 externally commissioned providers have been identified via the current Youth Service Grant and partners, to implement the Young Futures Hubs and Local Youth Transformation plans.

Using a 'Hub and spoke' model, the city will use this 'Test and Learn' year to work alongside young people, stakeholders and communities, to shape the development of services. Following review report recommendations, the North of the city has been identified as an area in need of additional youth provision. The Young Futures Hub will run from a new site, adjacent to Moulsecoomb Leisure Centre and in the heart of the local community.

Spokes will take the form of Detached youth work, Lead area provider Youth spaces, such as Brighton Youth Centre, The Weller Centre, Impact Initiatives, Turner and Jubilee Library.

Commissioned providers:

- Trust For Developing Communities- Leading the development of the Young Futures Hub North and lead commissioned provider for the East of the city.
- Brighton Youth Centre
- The Hangleton and Knoll Project- The Weller Centre
- Amaze
- Allsorts Youth Project
- YMCADLG

- Tarner
- Impact Initiatives
- AudioActive
- Old Boat Corner and PAYPR

Young Futures Hub Programme 2026-2029

- **Young Futures Brighton Streets:** Neighbourhood and youth facing, street-based youth work- City Wide partnership across Central, East, North and West providers.
- **YMCADLG:** Youth Information, Advice, Counselling Services (YIACS) open-access drop-in across North and Central Brighton, co-locating with youth providers. developing an additional central offer from Jubilee Library. Focus on step up/down and referral pathway development.

Local Youth Transformation Programme 2026-2027

- **YMCADLG:** Digital YIACS offer for Young Carers, in partnership with the Carers Project.
- **4x Youth Advisory Boards, (YABS):** led by Brighton Youth Centre, The Hangleton and Knoll Project, Trust for Developing Communities. Young people are at the heart of both programmes, with a focus on youth voice and decision-making. YAB members meet regularly to lead on the development of services and workstreams, shaping the implementation of Young Futures Hubs.
- **The Hangleton and Knoll Project:** Focus on linking Health and youth sector and Integrated Care Boards- Test and Learn to inform on connected systems for the city's youth.
- **Brighton Youth Centre:** Development of additional out of hours provision and Volunteer Strategy to build capacity.
- **Trust for Developing Communities:** Working in partnership with Brighton and Hove City Council to support the implementation of Young Futures Hub via youth voice and participation, partnership development, youth bus detached youth

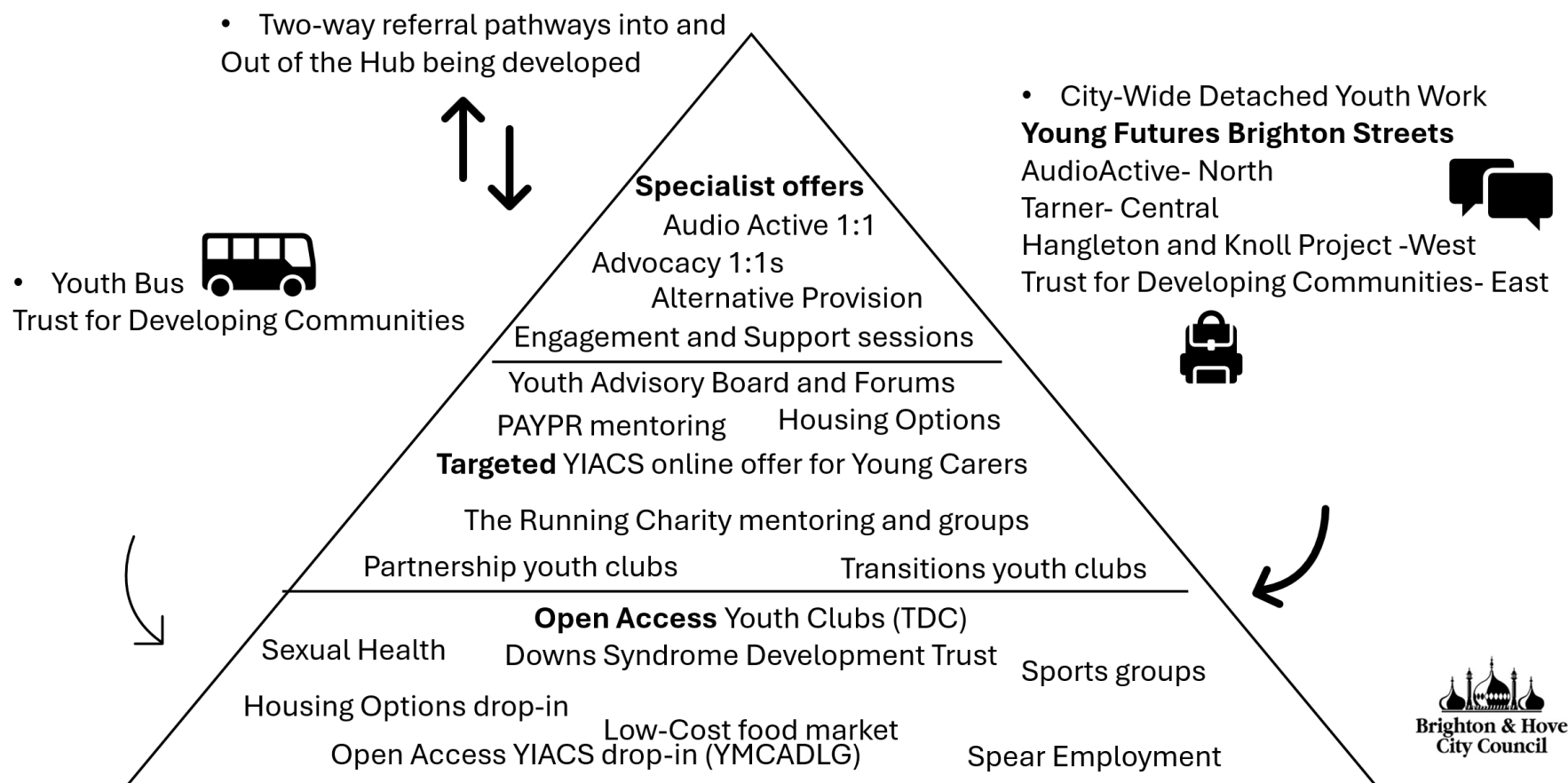
work in parks and spaces where young people spend time and additional out of hours provision development. Focus on youth-led service development.

- **Tarner:** Targeted focus on Transition Years (10-13) youth clubs and groups, partnership working and linking to communities and schools and families
- **Impact Initiatives:** Targeted focus on Transition Years (10-13) youth clubs and groups, partnership working and linking to communities, schools and families.
- **Amaze:** Development of additional provision for young people with SEND, partnership working and case consultancy, employability pathways and youth voice structures.
- **Allsorts Youth Project:** Focus on partnership working, youth-led Pride events, resource development and development of additional provision for LGBTQ+ young people including young people who are exploring their sexual orientation or gender identity.
- **Old Boat Corner and PAYPR:** Development of additional out of hours youth provision within a busy, multi-generational Community Hub in the North of the city. 1:1 mentoring offer via PAYPR with a targeted focus.
- **AudioActive:** Referral pathway development, partnerships and youth provision based in the North of the city with a strong link to the Young Futures Hub.
- **Skills Audit** in partnership with Sussex University- Workforce Development offer for the youth work sector in Brighton and Hove
- **Online Directory** in partnership with Trust for Developing Communities- Promoting the offer to all
- **Youth Database-** Connecting external and Local Authority youth provision data to better understand the local need



Young Futures Hub (North) site development,
June 2026

What's happening at the Hub- Phase 2 Summer and Autumn



Theory of Change

Context and Need

Children and young people in Brighton & Hove face increased vulnerability during key transition years (Year 6–8), alongside wider inequalities in access, wellbeing and opportunities. The NYA Youth Service Review (2025) highlights both strengths in relational youth work and areas for development including equity, consistency and data.

Inputs

- Grant funding to voluntary and community organisations
- Skilled youth work workforce
- Youth centres, community spaces and outreach infrastructure
- Detached youth work and Youth Bus
- Digital youth work provision/pathways
- Multi-agency partnerships
- Shared data and monitoring systems
- Strategic frameworks (Youth Matters, NYA Review, Young Futures)

Activities

- Open access youth work and informal education
- Targeted early help and support
- Transition support (Year 6–8)
- Equality-focused youth provision

- Detached and outreach youth work
- Youth voice, participation and co-production
- Multi-agency working and referral pathways

Outputs

- Increased participation in youth provision
 - Engagement of priority and marginalised groups
 - Delivery of youth work sessions (centre, outreach and digital)
 - Young people accessing early help
 - Increased co-production and participation
 - Consistent data collection across providers
-

Brighton & Hove City Council

Cabinet

Agenda Item 31

Subject: Progress report about delivering our Housing Strategy

Date of meeting: 16 July 2026

Report of: Cabinet Member for Housing

Lead Officer: Corporate Director Homes & Adult Social Care

Contact Officer: Diane Hughes

Tel: 01273 293159

Email: diane.hughes@brighton-hove.gov.uk

Ward(s) affected: All

Key Decision: Yes

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

For general release

1. Purpose of the report and policy context

1.1 The Brighton & Hove Housing Strategy (2024-29) was agreed by Full Council in October 2024 and sets out the vision on how best to deliver the city's housing objectives based around the following five priorities:

- Improve housing quality, safety, and sustainability
- Deliver the homes our city needs
- Prevent homelessness and meet housing need
- Promote improved health and wellbeing for all
- Provide resident focused housing services

1.2 The strategy contributes to the delivery of all four strategic outcomes in the Council Plan 2023 to 2027. It contains actions that will help us create a city to be proud of, a fair and inclusive city, and a healthy city where people thrive. It also contributes to our goal of being a responsive council with well-run services. The action plan focuses on our efforts to deliver accessible, affordable, and high-quality homes for everyone in Brighton & Hove. This report provides an update on the progress made towards our objectives during 2025-26 and confirms actions for 2026-27.

2. Recommendations

- 2.1 That Cabinet consider and note the progress made towards the ambitions set out in the Housing Strategy 2024-29 and agrees actions to be undertaken in 2026-27 as set out at Appendix 1.

Context and background information

- 3.1 The Housing Strategy sets out a long-term vision linked to a programme of work designed to tackle the city's housing challenges and priorities. In the second year (2025-26), 37 strategic actions were identified. Some were stand-alone pieces of work with others covering activities that will continue throughout the lifetime of the strategy. 22 of these actions are complete with the remaining 15 progressing. Where work is continuing into 2026-27 these actions are included in the Year 3 action plan at Appendix 1.

Priority 1: Improve housing quality, safety, and sustainability

- 3.2 Ensuring the safety and quality of our council homes remains a priority for the council. Helping residents live in well-maintained, healthy homes is a key investment objective, supported through our Housing Revenue Account (HRA) capital programme. In 2025/26 we invested over £44m in improving existing council homes, including increasing our investment in damp and condensation measures as well as our overall investment in planned and major capital works, in addition to sustainability and health & safety measures. In 2026/27 this figure rises to £54m.
- 3.3 This year the council has made steady progress towards achieving compliance with the housing safety and quality standard. This progress means more homes are meeting the required safety standards more consistently, ensuring residents are safer in their homes. We have continued to engage with the Regulator of Social Housing with regular updates to Cabinet and Place Overview & Scrutiny Committee to ensure ongoing oversight and accountability. The last update was considered at Cabinet on [14 May 2026](#).
- 3.4 We have continued to move away from a reactive approach to a structured compliance model with progress being made across all key safety areas. We have:
- Achieved 100% Fire Risk Assessments (FRA) across all building types and reduced the number of remedial actions during the year from 2,294 to 1,466 (of which 1,464 are low risk actions). In tandem we have also targeted intervention and investment to ensure fire safety for example through the Bristol Estate upgrades, fire alarm commissioning and progress with developing Personal Emergency Evacuation Plans (PEEPS) with vulnerable tenants.
 - Made positive progress with water safety with completed risk assessments up to 96.7% from 64% over the year with 1,061 overdue actions. We recognise that we are not yet where we should be on water safety and this remains a top priority.

- Made steady progress with our electrical testing programme which is on track to reach compliance by the end of 2026. 97% of homes have had an electrical test certificate (within 5 years of issue) alongside 86% of communal areas.
 - We are compliant across gas safety, smoke alarm detection and asbestos management.
- 3.5 To support this progress and embed the learning from our root cause analysis, we have created a Housing Improvement Plan (Safety & Quality) which outlines how we will be a great landlord that tenants can have confidence in. Development of the plan was supported by our five pillars in the Learning Organisation Framework, bringing together the impact we want to have on resident experience, what the regulator expects through the consumer standards and what the housing service must do to deliver safe, good quality homes and a resident-focused, data-led reliable service.
- 3.6 Steady progress was made in reducing the responsive repairs backlog, with volumes declining through the first half of 2025/26. However, proactive activity to support compliance with Awaab's Law significantly increased demand, with 8,287 jobs outstanding by the end of March. The impact of the proactive activity has driven substantial follow-on work across multiple trades, while increased engagement with residents to raise awareness of how to report repairs has also contributed to higher demand. Addressing and reducing this level of outstanding works will be a key priority for the service in the year ahead.
- 3.7 Featuring prominently in our work programmes has been a commitment to tackling damp and mould within our own homes. Our identified capital investment budget for condensation & damp works for 2025/26 to 2029/30 is £7.166m. Awaab's Law has provided the council with the opportunity to do things differently. To achieve the requirements, we have:
- Ensured we have embedded an approach of early identification and intervention resulting in faster response times to ensure safer living conditions.
 - Significantly increased activity before the law came into force, completing 1,100+ damp and mould jobs between July–Sept 2025 with damp technicians carrying out initial investigation surveys on first visit, identifying root causes (not just symptoms) and setting out clear follow-on works and timescales.
 - Set up a new specialist team in October 2025 focused specifically on damp and mould. This included specially trained technicians who carry out fast inspections, undertake initial treatment with structured follow-up reporting to residents as required.
 - Produced a Damp & Mould Policy with feedback from tenants helping to shape the final policy.
- 3.8 We have continued to be committed to our net zero ambitions. We are installing on average 6-8 new solar Photovoltaic (PV) systems each week with over 930 now installed across the housing stock. We have also begun our retrofitting programme with 16 of our least efficient homes now achieving minimum EPC ratings. We completed the decarbonisation of our Seniors Housing scheme Walter May House which will create warmer, more

comfortable homes for our tenants with lower energy bills. In addition, we are scoping out a council wide strategic energy partnership to support the journey to net zero.

- 3.9 Continued investment in our housing stock is key to ensuring our assets are well maintained and our five-year programmes for major and planned capital works commenced. In May 2026 Cabinet approved our Asset Management Plan which is a one-year operational framework for managing and investing in council housing stock and estates. Knowing our stock and our assets is key to this. With less than 20% of our stock having up-to-date condition data we recognise that we need to accelerate the programme and we have committed to completing a full stock condition survey on our homes over the next two years. This will create reliable evidence base and drive our future investment decisions, leading to improved quality of homes over time.
- 3.10 The future of the eight blocks within the three master planning areas has continued at pace this year with programme updates considered by Cabinet in July 2025 and March 2026. A Section 105 consultation took place with residents in the autumn, with 58% response rate. This was an extensive and multi-layered consultation which played a direct role in shaping the final recommendations to redevelop the eight blocks, serve initial demolition notices and adopt a formal rehousing policy and local lettings plan. Resident engagement and input remain at the heart of next steps for redevelopment of the three sites.
- 3.11 Improving the safety, quality and management of the private rented homes is an important priority for the city. During the year:
- 450 requests for assistance were received
 - 1,093 visits took place
 - 179 homes improved through our interventions.

We started preparing for the introduction of the Renters' Rights Act in May 2026 and updated our Private Sector Housing Enforcement Policy. This was agreed in April 2026 and ensured we had a legally compliant enforcement framework for the Renters' Rights Act, it strengthened action against non-compliant landlords and created a more consistent approach to housing enforcement across the city.

- 3.12 We moved into the second year of our five-year licensing schemes; across all schemes 8,694 homes are in our licensing schemes with 3,882 now fully licenced. These schemes are already helping to improve property conditions with officers ensuring compliance with licence conditions and addressing hazards that they identify. The team continue to investigate unlicensed properties with 440 unlicensed properties investigated, building on the 70 under investigation at the end of March 2025. As a result of further investigation by the Enforcement Team, 197 of these cases resulted in a licence application and 30 were exempted with the other properties under review.
- 3.13 The council is continuing to support and oversee the remediation of fire safety defects in private sector residential blocks, in line with Ministry of Housing, Communities & Local Government expectations. This includes

working with Registered Providers, managing agents and freeholders to ensure appropriate access to government funding, particularly through the Cladding Safety Scheme (CSS), which is intended to accelerate the remediation of unsafe cladding and associated external wall system defects in high to medium-rise buildings. The council's role focuses on enabling progress, providing intelligence, and maintaining oversight where risks are known and over the past year the council has inspected 275 buildings in the city.

Priority 2: Deliver the homes the city needs

- 3.14 A core aim of the Housing Strategy is to deliver at least 2,000 affordable homes over the lifetime of the strategy. We will achieve this through delivering our own supply and by working with Registered Providers and developers to increase the supply of affordable housing across the city. In the first two years of this strategy, we have delivered 684 homes and have started on site with our two largest affordable housing schemes at Flintfield Drive, Moulsecoomb (222 homes) and Sackville Road (306 homes).
- 3.15 In terms of affordable housing, the last 12 months have seen 458 completions across all delivery partners. This delivery means more households are able to access settled accommodation, they experience shorter waiting times to be rehoused, and there is greater stability for residents. Delivery will accelerate each year with forecasts showing that we are on course to meet our ultimate target of at least 2,000 new affordable homes by 2029. The current pipeline for the year ahead includes a mix of new build and acquisitions for the council.

Year	Investment	Sites/acquisitions	Target delivery
2026/27	£72m	Buy backs (130), Frederick Street (4), Former Hollingbury Library (9), Mixture of other small sites (16)	159
2025/26	£48.6m	Brickfields (28), Palace Place (11), Pocket Plots (1), Buy backs (118), St Aubyns (6)	164 - 44 of these homes will be used for TA

- 3.16 The council has successfully bid for fourth round of Local Authority Housing Fund grant funding receiving £9.2 million, which means the council has received £16.4m across all four rounds. This continues to enable us to purchase homes for council owned temporary accommodation and to also provide housing to resettle Afghan families further supporting our commitment to being a City of Sanctuary. In total since the start of the resettlement programme we have resettled 51 households (238 individuals). The council has also submitted an expression of interest to take part in a Local Authority-led pilot to provide housing solutions for asylum seekers, testing more sustainable, community-based accommodation approaches and reducing reliance on hotel use.

- 3.17 Beyond this year the council has a longer-term pipeline of over 470 homes. We know that the need is acute with 2,200 households in temporary accommodation and over 5,000 households on the Housing Register. To deliver on our ambitions we need to sustain momentum, look at all options to unlock delivery and work with partners to deliver on the full diversity of housing required by all residents to thrive in the city. This includes ensuring that we engage with the Local Government Reorganisation programme and Sussex and Brighton Combined County Authority (SBCCA) and its Strategic Place Partnership with Homes England to maximise opportunities for funding, delivery, and influence.
- 3.18 Building on our successful partnership with Hyde 'Homes for Brighton & Hove', a further site at Sackville Road is currently under construction which will deliver 306 new homes by March 2029. Further sites are being reviewed to help the partnership meet its initial objective to deliver 1,000 lower cost homes in the city.
- 3.19 As well as new supply we want to make best use of our current homes, and we continue to work to reduce under occupation, freeing up family sized homes to let. In 2025/26 30 households moved under the Tenant Incentive Scheme, meaning 51 homes have been made available for families since the strategy was agreed. We have increased communications to promote the scheme and reach households and will be drafting a downsizing strategy in the next year,
- 3.20 Empty homes, second homes and short term lets continue to impact on the local housing market, reducing the supply of permanent accommodation in the city. A 100% council tax charge on homes empty over one year and on second homes is in place to act as a deterrent to keeping homes empty. We have worked with owners to bring 313 homes back into use over the past year with 458 homes back in use since the start of this strategy.
- 3.21 The current Government have acknowledged the impact short term lets can have and are considering their options regarding a national registration scheme and the introduction of a new planning use class. We have participated in a research project with the Department of Culture, Media and Sport to support the roll out of these proposals and expressed an interest in becoming an early pilot authority for the government's short-term lets registration scheme.
- 3.22 The council agreed to a new Affordable Housing Planning Advice Note in March 2026 to support delivery of City Plan policies. This emphasises a strong commitment to maximising affordable housing provision, reflecting significant local need. In addition, we will be launching a new Brighton & Hove City Plan process with a summer 2026 scoping consultation, building on earlier engagement to shape long-term development under the new national planning system.

Priority 3: Prevent homelessness and meet housing need

- 3.23 We have built on the Homelessness Transformation Strategy which seeks to improve the customer journey for people facing homelessness and

maximising opportunities to prevent homelessness. This has included additional investment in our front door for homelessness, which is now moving to work within an early intervention space and support priorities for preventing homelessness and move on from temporary accommodation. This approach is evidenced by strong performance under the prevention duty, with successful preventions and early intervention achieved for over 500 households in 2025/26.

- 3.24 A key strategic aim is to reduce the number of households in temporary accommodation (TA), ensuring residents have access to stable housing and addressing the unsustainable financial cost of providing TA. Success in doing so is linked to homeless preventions and increasing our prevention outcomes is key to ensure we can bring overall TA levels down. Whilst we have not succeeded in bringing down our reliance in 2025/26 (an increase to 230 households to 2,200 at the end of March 2026) the rise is reflective of both local pressures and broader national challenge leading to a disproportionate high demand for TA locally. In response to this, in April 2026 Cabinet considered a report on TA which introduced a programme of reform to stabilise costs and improve outcomes by moving Brighton & Hove's TA system away from expensive emergency provision towards a more sustainable, higher-quality, locally controlled model.
- 3.25 The Homelessness and Rough Sleeping Strategy (2025–2030) was developed through a structured, multi-stage process with a strong emphasis on resident and lived-experience input, ensuring that real experiences shaped the final priorities and actions. The strategy sets out a clear approach to preventing homelessness and through delivery of the strategy residents will experience more consistent support and improved access to services. The final strategy was approved by Cabinet in December 2025, setting out a five-year plan focused on prevention, improving TA, and providing joined-up support. Delivery will be monitored through a partnership governance model with defined outcomes, multi-agency oversight, and regular reporting through the council decision-making structures.
- 3.26 Supporting our most vulnerable residents is essential to ensure a better quality of life. We have expanded our provision of women only TA as part of our commitment to improve safety, dignity and outcomes to women experiencing homelessness. We have achieved this through new permanent TA provision alongside interim and commissioned arrangements to ensure access to safe and appropriate TA at different points in the housing journey.

Priority 4: Support improved health and wellbeing for all

- 3.27 It is important we enable residents to live in their own homes as long as possible, and the council deliver adaptations across the range of tenures to help enable this. We have delivered:

Year	Investment	Disabled Facilities Grants	Adaptations to council homes	Total major adaptations delivered
2025/26	£4.53m	131	347	478

2024/25	£4.49m	171	232	403
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- 3.28 Work is also underway for the implementation of the Supported Housing (Regulatory Oversight) Act 2023. The act places a duty on local housing authorities to produce supported housing strategies to understand current availability and future need for supported housing. The council has commissioned a needs assessment in partnership with other Sussex local authorities to inform the strategy which is due for completion in 2027. The council has also taken active steps to minimise subsidy loss on exempt accommodation.
- 3.29 We want to ensure that residents can live in safe and well-maintained neighbourhoods and feeling safe in their homes is key. To support this, we have:
- Agreed and launched our Hate Incidents Policy for council housing.
 - Established weekly estate inspections providing regular oversight on estate conditions and early identification on issues.
 - Ensured there is a consistent visible presence on our estates through our Neighbourhood Officers enabling earlier intervention on neighbourhood and ASB concerns.
 - Created an ASB action plan which will strengthen our responses to ASB through early intervention, joint working and targeted estate-based activity.
 - Continued to deliver the popular Estate Development Budget delivering physical improvements alongside activities to improve residents' physical and mental wellbeing.
- 3.30 Through the integrated care teams we have implemented the Sussex highest and ongoing needs programmes setting up five multi-disciplinary teams working with risk data to target those residents with the highest health and care needs. This enables them to deliver a proactive care service that prevents unnecessary hospital admissions and builds links between Sussex Partnership NHS Foundation Trust and supported housing. We also continued delivery of the Brighton & Hove Mental Health and Housing Plan which has including weekly case meetings and established a provider forum. We have continued funding for hospital discharge support services and increased support and accommodation in the city for those with mental health support needs. This helps to improve health and housing outcomes for some of the most marginalised people in our community.

Priority 5: Provide resident focused housing services

- 3.31 Our aim is to be a Great Landlord. To achieve this, we have a suite of programmes in operation to support us to achieve this ambition. This includes the work to deliver against the Regulator of Social Housing consumer standards, Creating Great Homes Together Improvement Plan and the Housing (Safety and quality) Improvement Plan.
- 3.32 To be a Great Landlord we need to ensure tenants' views are at the heart of decision making in landlord services and ensure a wide range of voices are heard and listened to. We have built on last year's work and co-produced

the Creating Great Homes Improvement Plan with residents. A number of pieces of work has started to deliver tenant priorities including complaints handling, restarting estate inspections and consulting on the tenant and repairs handbook.

3.33 Our latest STAR survey results showed positive progress with tenant perception of our services:

- 71% of respondents are satisfied with the service provided by the landlord (up 4%)
- 77% of respondents indicating that we treat them fairly and with respect (up 1%).
- We identified that last year that more work needs to be done to ensure we listen and act upon views noting that only 53% of respondents thought that we do. In the latest survey 63% indicated that we do, an increase of 10%. Whilst more needs to be done this is an encouraging reflection on some of the changes we have made.

3.34 Housing has an award-winning approach to apprenticeships and a strong track record of supporting local recruitment. The service supports 23 full time apprentices in a range of trades, with colleagues completing apprenticeships alongside their existing job roles. Our Housing Repairs & Maintenance Team have produced a video to promote diversity and inclusion in our apprenticeship programme and visited secondary schools in the city to promote this career option to young people.

3.35 Working in partnership to deliver the council's Adult Learning Disability Strategy an autism awareness training video was produced for our repairs and maintenance service. Specialist supported living service for autistic and neuro divergent people with assessed eligible social care needs are now being sourced through our approved provider list.

3.36 Providing resident-centred services is key. Examples of this work include:

- Our trauma informed approach continues to be embedded in practice with reflective practitioners in place and a further 18 members of staff receiving training this year.
- We have signed up to the LGBTQ+ Housing Pledge committing to equality, inclusivity, and safe housing for LGBTQ+ people and we'll be submitting our evidence in support of this pledge in May 2027.
- Bridging Change run a regular community group for black and racially minoritised communities at our Leech Court Seniors Housing Scheme. The group was launched in 2025 and continues to grow in participation.

4. Analysis and consideration of alternative options

4.1 All actions that the council commits to within the Housing Strategy need to be resourced with budgets allocated. This will ensure that an action plan is delivered. In addition, utilising partnership and external funding opportunities will be essential in delivering against the ambitions and the council will work creatively and collaboratively with partners to bring forward options for delivery.

5. Community engagement and consultation

- 5.1 Tenants deserve to be heard, respected, and involved in decisions affecting their homes. A culture of genuine engagement leads to better services and stronger communities. The increased use of different methods over the past year and improvements in tenant perceptions of our services is to be welcomed. As we enter the second year of our operational plan we need to deliver against tenant priorities which will be overseen by a working group and achieve the actions identified through the Creating Great Homes Together programme. A longer-term vision for the service also needs to be delivered through producing a Tenant Engagement Strategy.
- 5.2 The Year 3 Action Plan is reflective of feedback provided by residents on the Housing Strategy and the key areas of focus. Our priorities have also been driven by ongoing customer insight and areas of concern that have been highlighted to us by our tenants. We are using this feedback to continuously refine and improve the services we provide. As well as our tenants we need to ensure all other residents can input and contribute ensuring that we actively include and amplify the voices of minoritised groups in relevant decision-making processes.
- 5.3 This report was also considered and discussed at People Overview & Scrutiny Committee on 14 July 2026.

6. Financial implications

- 6.1 The financial implications of implementing this strategy from 2026/27 onwards will be incorporated into the budget-setting processes and managed within the established budget constraints. The financial impacts must be accommodated within the budget approved in February 2026.
- 6.2 Detailed gross budgets and funding for 2026/27, covering Housing General Fund services and the Housing Revenue Account (HRA), are outlined in the February's budget report. Significant elements of the strategy depend on financial and other resources from partners such as Homes England and MHCLG to ensure successful delivery.
- 6.3 The 2026/27 HRA capital programme reflects the required investment in Health & Safety, Building Safety and Fire Safety compliance alongside the planned maintenance, improvement programmes, major capital projects to council housing as well as new supply projects, linking investment plans to the Housing Strategy.
- 6.4 The 2026/27 budget has been set with associated savings and mitigation measures to address identified pressures, including those relating to TA demand and cost management.
- 6.5 The strategy continues to face a range of financial risks, including:
- sustained pressures within Temporary Accommodation and the need to better understand and separate HRA and General Fund cost bases;

- the affordability and pace of property acquisitions, including the impact on borrowing capacity and associated revenue costs (management, repairs and financing);
- increasing compliance and service delivery costs; and
- the need to ensure that borrowing remains sustainable and does not compromise the ability to maintain existing housing stock.

6.6 A range of savings and service pressure mitigation measures are in place and will be monitored through Targeted Budget Management (TBM) processes. Investment has included:

- 2025/26 spend of £48.6m on new supply rising to £72m in 26/27
- 2025/26 spend of £44m on improving our homes rising to £54m on 26/27
- £0.4m budgeted for a pilot scheme in 2026/27 as an alternative to right to buy

Any variances will be reported corporately and addressed through in-year management action where possible, with longer-term implications reflected in future budget setting and financial planning.

Name of finance officer consulted: Ferrise Hall Date consulted 09 June 2026

7. Legal implications

7.1 Under the Homelessness Act 2002, local housing authorities must formulate a homelessness strategy and keep it under review. Authorities can modify their strategies when circumstances change (such as new housing legislation, market shifts, or changes in partner organizations) and must consult relevant voluntary or public organizations before doing so. This report therefore is part of the statutory requirements. There has been some significant new legislation such as Awaab's law, and this has been addressed in the report.

Name of lawyer consulted: Simon Court Date consulted 26 May 2026

8. Equalities implications

8.1 The Housing Strategy was developed with an acknowledgement that housing inequality exists in Brighton & Hove, The vision of the Housing Strategy is 'Homes for everyone' and it is anticipated that the Housing Strategy will lead to improved outcomes relating to the condition and supply of housing across the city as well as promoting resilience and improved health and wellbeing.

8.2 An Equalities Impact Assessment was completed when the strategy was drafted and a review of how we have addressed and delivered against our findings so far is included at Appendix 2.

8.3 As we have developed the new strategies and policies (listed below) equalities considerations have been embedded in both their design and their delivery. Consultations we have undertaken have includes equalities monitoring questions to understand how those strategies and policies could

affect our residents and documents have included guidelines or actions to address disproportionate effects on residents with specific needs based on their protected characteristics. This will ensure the services provided close gaps on the affected communities.

- Homelessness & Rough Sleeping Strategy
- Hate Incident Policy
- Housing Allocation Policy
- Vulnerability and Reasonable Adjustments Policy (in progress)

8.4 The services we are providing are also offering positive outcomes for people with protected characteristics, making a real change on these resident's life:

- Older people living in Seniors Housing: Extensive engagement through annual reviews, scheme meetings, referrals to partner services and, wellbeing contacts and workshops.
- Families and young people: Delivery of 262 new family homes (2–5 beds) and development of a 29-unit supported housing scheme for young people.
- Disability: Significant major adaptations delivered to enable residents to remain in their homes (900 households benefiting in two years), Autism awareness video produced for repairs staff. Supported living provider framework and brokerage function in place.
- LGBTQ+: Housing Pledge has been set up, helping LGBTQ+ residents have input at executive/strategic level in addition to increase visibility and LGBTQ+ training within the council.

Residents with intersecting protected characteristics:

- Refugees and Asylum seekers: 48 households (235 individuals) resettled through Afghan Resettlement Programme
- Multi Compound Needs: Multi Compound Needs service model developed to deliver integrated services across housing, health, and homelessness.
- Women: Women-only accommodation has been made available to ensure women victims from Domestic and/or Sexual Abuse have access to safe and appropriate temporary accommodation at different points in the housing journey.

9. Sustainability implications

9.1 Housing is one of the largest contributors to the city's CO2 emissions. Reducing the energy used to build, heat, and operate homes is key to achieving our Net Zero ambitions. The Housing Strategy outlines steps we are taking to address sustainability and zero carbon challenges in new and existing stock in Brighton and Hove. Taking a multi-tenure approach, our offer is shaped by working in partnership with others to deliver ambitions.

10. Health and wellbeing implications

10.1 Having poor quality, unaffordable, inappropriate or lack of housing directly impacts people's ability to maintain their health, well-being, and independence. Measures to improve housing quality, tackle health and safety hazards, improve the environment and increase community cohesion

will have a positive impact on health and contribute to tackling health inequalities.

- 10.2 The Health Counts 2024 survey highlighted cost of living and housing concerns for respondents. 86% of respondents were taking at least one action due to increases in the cost of living with around one in five respondents (21%) fairly or very worried about their housing conditions e.g. damp, cold, leaks etc. There are also concentrations of areas with higher levels of worries about housing conditions – 27% of those living in the most deprived areas worry compared to 10% living in the least deprived areas
- 10.3 38% of respondents recorded high anxiety scores. This increased to 46% of those in the most deprived 20% of areas, compared to 29% of those in the least deprived areas. This increased significantly to 72% for respondents living in temporary or emergency accommodation. It was also identified that those who live in social housing face substantially higher health risks with regards to four key areas – disability, smoking, recent self-harm and suicide. This insight highlights the clear link between housing and wellbeing and the importance of the actions we are taking through the strategy to tackle inequality.

Other Implications

11. Procurement implications

- 11.1 The Housing Strategy aims to maximise overall value, including social value through our procurement and other activities. We encourage the use of local suppliers and contractors as well as identifying other opportunities to add value, for example, our in-house repairs and maintenance service provide opportunities for work experience and apprenticeships to local people.

12. Crime & disorder implications:

- 12.1 The strategy reinforces the continued need for services to support rough sleepers and those experiencing domestic abuse, and, on improving joint working with the police and other partners to ensure issues of harassment and hate crime are tackled effectively. It also identifies the need to create safe homes and neighbourhoods and to tackle crime and antisocial behaviour on our estates.

13. Conclusion

- 13.1 Progress is beginning to be made across all the Housing Strategy priorities. Whilst there remains a lot of work to do to meet our ambitions, the proposed action plan for 2026/27 provides the platform for continuing to make the required progress.

Supporting Documentation

Appendices

Appendix 1 Housing Strategy Action Plan 2026-27

Appendix 2 Review of Housing Strategy Equalities Impact Assessment

ID	Strategic Action	Deliverables / Milestones	Housing strategy focus area	Council plan priority	Lead Officer(s)
Priority 1. Improve housing quality, safety and sustainability					
HS01	Ensure the council complies with Social Housing Regulation Act 2023 and meets the four consumer standards that underpin the legislation.	Continue engagement with regulator in relation to meeting the consumer standards and collate evidence to demonstrate compliance Improvement plans are delivered on schedule for each of the four consumer standards (including Creating Great Homes Together, Housing (Safety & Quality) and Consumer Standards)	1.1 Improve the quality of council homes and estates	Improve housing quality, safety and sustainability	Director Housing People Services & Director Homes and Investment
HS02	Provide a repairs and maintenance service for council owned housing	Reduce backlog of housing repairs Remodel the existing contractor framework by December 2026. Realise Strategic Management Plan to fully meet electrical safety compliance by December 2026. Launch a repairs and maintenance policy co-produced with tenants by September 2026 Undertake incoming and lateral mains testing to all low, medium and high rise buildings. Complete lateral mains replacement and upgrade in six blocks.	1.1 Improve the quality of council homes and estates	Improve housing quality, safety and sustainability	Head of Housing Repairs & Maintenance
HS03	Invest in building and fire safety to meet duties under the Building Safety Act and Fire Safety (England) Regulations and ensure we are compliant with Health & Safety.	Deliver action plans aligned to key priority actions in the Housing Health & Safety Action Plan 2026/27 for gas, electric, water, asbestos, lifts, and fire risk by March 2027. Fully meet requirements of Fire Safety (Residential Evacuation Plans) (England) Regulations 2025 for tenants who may not be able to evacuate on their own. Design and deliver capital programme for water safety in 2026/27	1.2 Prioritise building and fire safety improvements	Improve housing quality, safety and sustainability	Head of Housing Safety & Regulatory Compliance
HS04	Deliver planned and major works capital programmes	Agree Asset Management Plan 2026/27 Cabinet (May 2026) Deliver 2026/27 Asset Management Plan Deliver Year 1 of stock condition survey programme Complete major and planned works as per delivery schedule	1.2 Prioritise building and fire safety improvements	Improve housing quality, safety and sustainability	Head of Housing Investment & Asset Management

HS05	Improve the condition of private rented sector accommodation	Agree new Private Sector Housing Enforcement Policy (April 2026) Implement phase 1 requirements of Renters Rights Act (May 2026) and preparation for phase 2 requirements Publish interim review of existing Selective Licensing Scheme (June 2026) Roll out of selective licensing scheme to further wards in 2026/27 (October 2026) Undertake fire remediation actions - by identification of medium and high rise (11-18m) private sector blocks with potentially unsafe cladding and link through to the government's Cladding Safety Scheme	1.3 Improve standards in the private rented sector	Improve housing quality, safety and sustainability	Head of Housing Strategy & Supply
HS06	Improve the energy performance of homes	Complete current PV programme for council owned homes Complete decarbonisation of Manor Paddock Seniors Housing Scheme Delivery of year 2 of Warm Homes Social Housing Fund project - 40 homes to be retrofitted to minimum EPC C. Complete mobilisation of collective solar purchasing scheme across Sussex providing low carbon technologies to private households and complete round 1 of scheme.	1.3 Improve standards in the private rented sector	Improve housing quality, safety and sustainability	Head of Housing Investment & Asset Management
HS07	Progress workstreams on future options for the three master planning areas (St James House, Nettleton Court, Dudeney Lodge, Swallow Court, Falcon Court, Heron Court, Kestrel Court and Kingfisher Court)	Procure with residents an Independent Tenant & Leaseholder Advisor (ITLA) to support residents through rehousing and design development stages, Identify delivery routes for each masterplan area following design and financial due diligence Co-design with residents the communications, engagement and involvement charter	1.1 Improve the quality of council homes and estates 5.1 Listen and engage with our residents	Improve housing quality, safety and sustainability	Director of Estates Renewal
Priority 2. Deliver the homes our city needs					
HS08	Accelerate place-based engagement and evidence mobilisation to shape the new Brighton & Hove City Plan	Issuing and publication of the 'Notice of intention to commence local plan preparation Undertake Scoping Consultation. Consultation on proposed local plan content and evidence	2.1 Increase the supply of high-quality homes that meet the needs of our communities	Increase housing supply	Head of Planning

HS09	Reduce the number of private sector long-term empty homes in the city	Bring 100 long term empty homes (1 years plus) back into use by March 27. Review options for using the Social & Affordable Homes Programme funding to bring empty properties into use for affordable housing.	2.1 Increase the supply of high-quality homes that meet the needs of our communities	Increase housing supply	Head of Housing Strategy & Supply Head of Temporary & Supported Housing
HS10	Increase supply of affordable homes - rented and low cost ownership	159 additional council homes delivered by the council (new build, acquisitions & conversions) by March 2027 Deliver Year 1 of the Local Authority Housing Fund (phase 4) programme Deliver Year 1 of the TA Supply Strategy Review existing council assets to establish the best opportunities for developing more affordable homes Future sites secured through Homes for Brighton & Hove to achieve 1,000 new homes over the lifetime of the project New build delivery programme in 26/27 - completion at Frederick Street (4 homes), Former Hollingbury Library site (9 homes), other small sites (16).	2.2 Increase the supply of affordable homes	Increase housing supply	Head of Housing Strategy & Supply Head of Place Making
HS11	Create new social housing lets by reducing under occupancy and increasing options for home ownership.	Develop downsizing strategy Home Ownership Grant pilot 2026/27 for 8 blocks in master planning areas.	2.2 Increase the supply of affordable homes	Increase housing supply	Head of Tenancy Services
HS12	Reduce the number of short-term lets and second homes in the city.	Prepare for potential changes in legislation in relation to short term lets. Review impact of 100% council tax charge on 2nd home ownership (March 27)	2.2 Increase the supply of affordable homes	Increase housing supply	Head of Housing Strategy & Supply Head of Planning Head of Welfare, Revenues & Business Support
Priority 3. Prevent homelessness and meet housing need					
HS13	Reduce the number of households in temporary accommodation	Deliver actions within the Temporary Accommodation Reduction Action Plan Deliver Year 1 TA Supply Strategy Work with Registered Providers to develop an Exempt Supported TA model	3.2 Reduce the number of households in temporary accommodation	Improve housing support for residents	Head of Temporary & Supported Accommodation/ Head of Housing Strategy & Supply

HS14	Improve the quality of temporary accommodation	Implement the Dynamic Market for temporary accommodation to increase the supply and quality of accommodation. Reduce the unit cost of temporary accommodation, including reducing reliance on high-cost nightly paid accommodation and improving value for money through the Dynamic Market and supply strategy. Undertake a pilot scheme providing grants to private landlords to improve energy efficiency of their homes. Compliance standards will be defined within Dynamic Market specification to ensure providers are aligned with national policy and also there will be a trauma informed approach requirement to Housing Management standards in these arrangement.	5.3 Deliver effective, high quality housing services	Improve housing quality, safety and sustainability	Head of Temporary & Supported Accommodation
HS15	Deliver Homelessness and Rough Sleeping Strategy	Include MHCLG local plan actions in strategy action plan - due for publication September 2026 Establish Homelessness & Rough Sleeping Partnership Board June 2026 Implementation underway with work on key deliverables captured under HS16, HS17, HS19, HS20 & HS21	3.3 Focus our assistance on people who need most help	Improve housing support for residents	Head of Homelessness & Housing Options
HS16	Commission Single Homeless Services (Street Outreach, Housing First)	Housing First and Street Outreach Services to be repocured in 2027	3.3 Focus our assistance on people who need most help	Improve housing support for residents	Head of Temporary & Supported Accommodation
HS17	Develop joined up approaches for those most at risk of harm or where there is greater impact if they become homeless	Increase our co-location with external services, following data review of areas to be targeted by end of 2026 Develop a risk assessment and first stage of a no first night out model for those at risk of experiencing rough sleeping by summer 2027.	3.3 Focus our assistance on people who need most help	Improve housing support for residents	Head of Temporary & Supported Accommodation Director - Commissioning & Communities
HS18	Support and resettle refugees and asylum seekers	Deliver our commitments as a City of Sanctuary Support the Refugee Resettlement Programmes including identifying suitable properties in the private rented sector Other properties to be acquired through the Local Authority Housing Fund in 2026/27	5.2 Ensure our housing services are accessible, fair and inclusive	Work to reduce inequality	Head of Housing Strategy & Supply Director - Commissioning & Communities
Priority 4. Support improved health and wellbeing for all					

HS19	Ensure that people can live in safe and well-maintained neighbourhoods and feel safe in their homes	Complete review of Estate Development Budget and maximise opportunities for social value to support the scheme Deliver safer communities improvement projects including improving awareness of reporting routes and escalation, provision of consistent advice and staff training and, introduce community commitments that support positive behaviours. Implement Neighbourhood Health Model Agree Vulnerability Policy Improve the look and feel of council estates by working in partnership with teams across the council to bring forward improvements.	4.1 Work with partners to develop safe, healthy and inclusive estates and neighbourhoods	Create safe public spaces that are accessible for all	Head of Tenancy Services
HS20	Support older people to be independent and resilient	Complete Seniors Housing Review to strengthen the value of the service for residents, building upon what's worked well, especially in terms of preventative and wellbeing work	4.2 Support people to live independently	A healthy city where people thrive.	Programme Director Integrated Service Transformation Head of Tenancy Services
HS21	Support people with additional support needs to be independent and resilient.	Deliver the elements of the learning disability strategy housing action plan, autism action plan and mental health action plan where resources have been committed by partners and seek further resources where these are not available.	4.2 Support people to live independently	Improve housing support for residents	Director - Commissioning & Partnerships Head of Place Making Head of Disability Services 25+ Head of Children's Disability Services Programme Director
HS22	Meet requirements of Supported Housing (Regulatory) Oversight Act 2023.	Complete provider mapping and stakeholder engagement including call for evidence Complete a needs assessment of supported housing provision for the city (December 2026) Deliver new Supported Housing Strategy (March 2027) Prepare for anticipated introduction of mandatory licensing for supported housing (date TBC by MHCLG)	4.2 Support people to live independently	Improve housing support for residents	Head of Temporary & Supported Accommodation Head of Housing Strategy & Supply. Head of Welfare, Revenues and Business Support
HS23	Enable people to live independently in their homes by providing housing adaptations	Provide and deliver adaptations for those in need - £4.8m of investment in 2026/27 (£1.83m for council owned homes and £2.97m for privately owned homes through Disabled Facilities Grant).	4.2 Support people to live independently	Improve housing support for residents	Head of Service (Access) Adult Social Care)

HS24	Meet requirements of Awaab's Law Phase 2	Prepare for phase two of Awaab's Law which will make response times legally enforceable for a wider range of serious housing hazards, including excess cold and heat, fall risks, structural safety issues, fire and electrical hazards, and hygiene or sanitation problems (expected October 2026)	4.3 Promote healthy housing for our residents	Improve housing quality, safety and sustainability Enable people to live healthy, happy and fulfilling lives	Head of Housing Repairs & Maintenance Head of Investment & Asset Management
Priority 5: Provide resident focused housing services					
HS25	Ensure that tenants' views are at the heart of decision-making about the delivery of our landlord services.	Deliver Year 2 of the Transforming Tenant Engagement Action Plan 2025-27. Establish working group to oversee progress. Produce Tenant Engagement Strategy Create a resident scrutiny panel for the repairs service Provide a training programme for tenants so they can take part with confidence	5.1 Listen to and engage with our residents	Meet the needs of our residents and other customers	Director Housing People Services Director - Commissioning & Communities
HS26	Brighton & Hove City Council to become a great landlord	Deliver Year 1 of 'Creating Great Homes Together - Continuous Improvement Plan' by March 2027 Strengthen approach to complaints handling by March 2027	5.1 Listen to and engage with our residents 5.3 Deliver effective, high quality housing services	Meet the needs of our residents and other customers	Director Housing People Services & Director Homes and Investment
HS27	Provide housing information and advice appropriate to the needs of our diverse communities	Review the customer journey and information on housing services webpages as part of council wide website refresh Explore alternative digital tools for engaging with customers	5.2 Ensure our housing services are accessible, fair and inclusive	Meet the needs of our residents and other customers	Director Homes and Investment Director Housing People Services Strategic
HS28	Ensure that our housing workforce has the relevant skills and competencies to deliver an effective service to all residents.	Meet requirements of Regulator of Social Housing conduct and competence requirements for staff including agreeing a learning and development policy, professional standards and commencing a programme of mandatory qualifications for relevant staff (October 2026)	5.3 Deliver effective, high quality housing services	Improve housing support for residents Our ways of working	Director Homes and Investment Director Housing People Services
HS29	Work with other social landlords to share intelligence, pool resources and work on shared priorities.	Supported Housing Strategy - stakeholder event (June 2026) Partnership work with Registered Provider's to review options for exempt accommodation model for RP Brickfields housing scheme - enter into a 125-year lease with Southdown (Registered Provider) to manage and act as the landlord. Consult with Registered Providers on a new Tenancy Strategy (September 2026)	5.4 Work with our partners to agree and deliver shared priorities	Improve housing quality, safety and sustainability Increase housing supply Improve housing support for residents	Head of Housing Strategy and Supply Head of Commissioning (ASC)

HS30	Work with NHS and other partners to improve services and support for people with multiple, compound needs	Homeless & Multiple Compound Needs ICT to support delivery of priority 3 of the new homeless & rough sleeping strategy, providing joined up services for those most in need Test a new model of Integrated health & care in reach support into New Stiene Mews hostel Complete annual multiple needs audit to understand prevalence of MCNs within city's homeless population	5.4 Work with our partners to agree and deliver shared priorities	Improve housing support for residents	Programme Director - Integrated Service Transformation
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Appendix 2 Review of Housing Strategy Equalities Impact Assessment

Recommendation	Achievements by end of year 2
Recommendation 1: In Progress The collection and analysis of equality data by housing services should be reviewed and, where required, improved. This included reviewing the systems used to collect and analyse equalities data. The Year 2 (2025/26) action plan for the strategy should contain an explicit action to ensure that this is addressed.	The council's Equalities Data Standards were used to frame equality monitoring questions for the Homelessness and Rough Sleeping Strategy consultation exercise in autumn 2025 and the Hate Incident Policy consultation in autumn 2024. Resources have been allocated to carry out an EIA for Tenancy Services in order to assess the gaps that the service has in delivering considering all the council tenants needs.

Recommendation	Achievements by end of year 2
Recommendation 2: In Progress In implementing the strategy, and in planning and delivering housing and support services, particular consideration should be given to impacts on: - older adults - children, young people and their families - disabled people with additional focus on disabled children and young adults and disabled people 65+ (Y1 action plan actions are identified in the relevant section) - people from Black and racially minoritised groups including gypsies, Roma and travellers - Gender Identity and Sex Gender Reassignment LGBT+ people - Pregnant people - Current and former armed forces personnel - Refugees and asylum-seeking children - Domestic and/or Sexual Abuse and Violence Survivors and people in vulnerable situations Specific issues, considerations and key intersections are identified in the relevant sections	Issues relating to these protected characteristics and their intersection with homelessness and rough sleeping are captured and acknowledged in the Review of Homelessness 2025 and in a more detailed Equality Impact Assessment (EIA) for the Homelessness and Rough Sleeping Strategy. These insights have been used as inputs to ensure that considerations are included in the delivery of services. A review of the Private Sector Housing Enforcement Policy, based on the Renters' Rights Act (2025), is has been completed in order for enforcement actions to be updated. These actions are intended to create a fairer and more inclusive rental market by reducing inequalities and promoting housing security. Greater predictability in rent levels, stronger protections against eviction, and improved housing standards are expected to lead to direct positive improvements in health, safety and wellbeing across populations with different protected characteristics. More generally, the Housing Allocation Policy, the Homelessness and Rough Sleeping Strategy, the Hate Incident Policy and this Housing Strategy have been developed through the lens of the Equality Act (2010). This approach has been taken to ensure that clear guidelines are in place for the delivery of housing services, taking into account the specific needs of people with all protected characteristics and vulnerable groups. Examples of actions that have been implemented include the following: • Initiatives such as the Multiple Compound Needs Integrated Community Team Model, women-only accommodation, and the Afghan Resettlement Programme are being delivered to provide services tailored to people experiencing intersectional disadvantages across different protected characteristics (see further details in updates for Recommendations 8 and 9). • Older adults: Ongoing communication and engagement with tenants living in Seniors Housing regarding their wellbeing, tenancy, support needs and engagement actions have been maintained through annual reviews (93% of residents), quarterly scheme manager meetings (696 residents), and regular verbal contact (over 4,000 recorded entries). A total of 608 referrals have been made to partner services, primarily health-related, to support residents in living independently. Health, wellbeing and social connectivity activities have been delivered with a range of partners, including Volunteering Matters (Lifelines projects such as knitting, Mah Jong, art sessions and digital support), the Trust for Developing Communities - TDC, Volunteering Matters and local health services (Health and wellbeing events), and Bridging Change (community groups for Black and racially minoritised communities). Creative and therapeutic activities have also been delivered by Fabrica (arts sessions), Music for Connection (music sessions) and Pegasus Puppetry (puppetry workshops), supporting residents living with dementia.

Recommendation	Achievements by end of year 2
	• Children, young people and their families: The provision of affordable rented housing at social rent or Local Housing Allowance (LHA)-capped rent levels has been prioritised over low-cost home ownership schemes. This approach is expected to improve household income for families with children and young people. In addition, the mix of house types has been adjusted to increase the proportion of three- and four-bedroom homes available for affordable rent, supporting reductions in long waiting times on the housing register for larger family accommodation and enabling families to remain within the city rather than relocate to more affordable neighbouring towns. Across the city, the provision or enabling of 177 two-bedroom homes, 68 three-bedroom homes, 16 four-bedroom homes and one five-bedroom home has been achieved, all of which are affordable, safe and secure homes for children, young people and their families. Work has also continued on the development of a 29-unit scheme of transitional supported housing for young people, designed as a stepping stone towards independent adult living. • Disabled people, with additional focus on disabled children and young adults, and disabled people aged 65+: ○ To support residents in remaining in their own homes for as long as possible, major adaptations have been delivered through Disabled Facilities Grants (171 in 2024/25 and 131 in 2025/26) and in council homes (232 in 2024/25 and 347 in 2025/26) ○ A training video for repairs operatives on supporting tenants with autism has been developed to strengthen understanding across the service and to ensure that repairs are delivered inclusively and responsively. ○ To support delivery of the Council's Adult Learning Disability Strategy, a Housing and Support working group has been established. A Housing and Support tile has been added to the Easy Read Hub website to provide more accessible information. A new approved provider list for supported living and community support has been implemented, and an adult learning disability brokerage function has been established. In addition, the Sussex Positive Behaviour Support (PBS) Network has been engaged to support the development of a new service focused on hospital discharge.

Recommendation	Achievements by end of year 2
	• People from Black and racially minoritised groups, including Gypsies, Roma and Travellers: Specific considerations for people with these protected characteristics are included within the Housing Allocation Policy and the Homelessness and Rough Sleeping Strategy (see further details in the updates for Recommendations 3, 4 and 5). • LGBTQ+ people: An LGBTQ+ Housing Pledge has been established, through which LGBTQ+ resident input at executive and strategic levels is being enabled, LGBTQ+ visibility is being increased in the organisation, and specific LGBTQ+ training is to be provided to staff. • Pregnant people: Additional actions to be considered. • Current and former armed forces personnel: A Community Covenant is in place, representing a pledge of mutual support between the civilian community and the local armed forces community. Through this covenant, local community support for armed forces personnel is encouraged, public understanding of issues affecting the armed forces community is promoted, and efforts are made to ensure that serving personnel, veterans and their families are not disadvantaged as a result of service. In addition, the Allocations Policy implemented in 2025 amended priority to current or former armed forces personnel. • Refugees and asylum-seeking children: Support is being provided through the Afghan Resettlement Programme (see further details in the updates for Recommendation 9). • Survivors of domestic and/or sexual abuse and violence, and people in vulnerable situations: The Violence Against Women and Girls, Domestic Abuse and Sexual Violence Strategy 2025–28 was launched in January 2025. This strategy includes the provision of a range of support services and accommodation options, including women-only accommodation (see further details in the updates for Recommendation 9).

Recommendation	Achievements by end of year 2
Recommendation 3: In Progress That the housing needs of the city's Black and racially minoritised groups (including Gypsy, Roma and Travellers) are assessed in year 2 of the strategy action plan and plans put in place to address any negative disproportionate impacts identified.	Housing needs assessments: Brighton & Hove has joined other councils in Sussex to commission a review of supported housing. The specification mirrors national guidance on conducting a review. Further work is ongoing on local data to identify issues affecting Black and racially minoritised groups, for example, analysis of evictions from supported housing by protected characteristic. Actions in place: The Housing Allocation Policy, signed off in 2025, was drafted with reference to the Equality Act 2010 and the council's Public Sector Equality Duty. The Council has adopted the Commission for Racial Equality's Statutory Code of Practice on Racial Equality in Housing and the statutory guidance Improving Access to Social Housing for Victims of Domestic Abuse. Close work with agencies and supported housing providers has been carried out to help customers access this scheme and ensure that information meets the needs of people with a disability, sensory impairment, or language needs. The Homelessness and Rough Sleeping Strategy includes Priority 3 - Improve joined-up support with our partners for people who most need help, which considers the specific needs to deliver services to people fleeing from domestic violence, vulnerable families, refugees and asylum seekers, LGBTQ+ youth, people with mental health needs, neurodivergent people and others with multiple, compounded needs, and people experiencing rough sleeping.
Recommendation 4: In Progress When future housing needs assessments are commissioned, consideration of ethnicity, 'Race', ethnic heritage and its intersections should be included in the specification	The review of Homelessness in Brighton & Hove 2025 identified over-representation of Black and racially minoritised groups in temporary accommodation. The Pan Sussex Supported Housing Needs Assessment to be carried out this year will identify the demographic characteristics of people using supported housing. Findings from this assessment will then be considered in the strategy development for the different pathways - older people's, transitional & long term.
Recommendation 5: Complete That Black and racially minoritised groups are explicitly considered in the development of the new homelessness and rough sleeping strategy, identified as action HS17	The Homelessness and Rough Sleeping Strategy 2025-2030 includes action to work with community, voluntary and faith organisations to develop targeted, culturally appropriate information and advice for people from Black and Racially Minoritised communities, including people seeking asylum and refugees, so they can access the support they need.

Recommendation	Achievements by end of year 2
in the Year 1 action plan for the housing strategy.	
Recommendation 6: Complete The findings of this equality impact assessment and the data and needs assessments that have informed it are incorporated into the needs assessment for the new homelessness and rough sleeping strategy (HS17 in Y1 action plan).	The EIA for the housing strategy was a source of evidence for the Review of Homelessness in Brighton & Hove 2025. Equality data was updated to inform the review, and a separate EIA was published with the Homelessness and Rough Sleeping Strategy.
Recommendation 7: In Progress Use the development of a new homelessness and rough sleeping strategy to review and strengthen partnership arrangements for tackling homelessness in the city (HS17 and HS35 in the Y1 action plan).	Working with partners is deemed as a key factor for the Homelessness and Rough Sleeping Strategy, being integrated in its objectives as well as in the way of delivering it. Governance and partnership arrangements for tackling homelessness are being taken forward with a new Homelessness and Rough Sleeping Partnership Board overseeing the work.
Recommendation 8: Complete That the needs of people with multiple, compound needs are explicitly considered in the implementation of the strategy, with a particular emphasis on Priority 3: Prevent homelessness and meet housing need. This is identified as action HS34 in the Y1 action plan.	Actions to address homelessness and multiple compound needs are identified under Priority 3 of the Homelessness and Rough Sleeping Strategy 2025 to 2030. They include the establishment of a Homelessness and Multiple Compound Needs (MCN) partnership, embedding coproduction and lived experience into service design, and taking forward plans for a homeless healthcare hub. An MCN Integrated Community Team model has been set up by integrating the homeless, rough sleeping and homeless healthcare services through the Multiple Compound Needs Partnership. The team has recently completed a detailed assessment of MCN prevalence and needs and agreed on key priorities of establishing an MCN hostel in the city, reducing the number of preventable A&E attendances related to MCN, and increasing the number of people supported through its multi-disciplinary team from 100-200 a year.

Recommendation	Achievements by end of year 2
Recommendation 9: In Progress That risk of exploitation and harm is explicitly considered in the implementation of the strategy and in the development of services for people at higher risk due to specific or intersecting characteristics.	The Homelessness and Rough Sleeping Strategy commits to target support for the most vulnerable people, including ensuring multi-agency protocols are in place for young people leaving care, 16- and 17-year-olds, pregnant people, families with children, survivors of domestic abuse, refugees and asylum seekers, and LGBTQ+ people. Multi-agency guidance issued by the Safeguarding Adults Board for vulnerable individuals with care and support needs, including Multiple Compound Needs moving across local authority areas. Women-only accommodation has been made available through council-owned and interim and commissioned arrangements to ensure women have access to safe and appropriate temporary accommodation at different points in the housing journey. Additional accommodation for Afghan refugees has been made available with the support of the Local Authority Housing Fund (LAHF) 3, where all properties acquired are now occupied. Successfully bid for 9.2m funding for LAHF 4 to provide for the other 46 properties over the next 4 years for TA and resettlement use. In total, we have resettled 51 households (238 individuals) of the Afghan resettlement programmes from the start of the programme until the end of March 2026. project. The programme includes intensive casework, English language and employability support delivered by Voices in Exile, alongside holistic, regular caseworker engagement with families during their first two years. This provides a high level of protection from exploitation and harm and an early warning of safeguarding concerns such as domestic abuse. Where domestic abuse does occur, Voices in Exile continues to support survivors (and sometimes perpetrators), alongside a multi-agency response. An expression of interest has been submitted to be considered for an asylum seekers accommodation pilot.

Recommendation	Achievements by end of year 2
Recommendation 10: In Progress Ensure that the recommendations in this EIA are reflected in the action plan to deliver the Social Housing Regulator’s Transparency, Influence and Accountability Consumer Standard.	The Vulnerability and Reasonable Adjustments Policy is drafted and aiming to be agreed by Cabinet in December 2026. Once the policy is signed off, there will be a co-production process to write the strategy for delivery, which will establish how the Council will align the policy with lived experience. The policy and strategy promote fair and equitable outcomes by embedding respect, accessibility, and a person-centred, trauma-informed approach that ensures tenants are listened to and supported with dignity. They use data and equality analysis to meet diverse needs, offering a wide range of adjustments and communication options to reduce barriers. Clear communication, transparent decision-making, and accessible complaints processes strengthen accountability, while tenant feedback—captured through Tenant Satisfaction Measures and surveys—and co-production with residents drive continuous improvement and ensure services reflect lived experience. The Creating Great Homes Together Action Plan includes an action that aims to strengthen tenant influence and involvement in shaping housing services. As part of its scope, it looks for the tenants' engagement to be diverse, inclusive, modern, and accessible.

Brighton & Hove City Council

Cabinet

Agenda Item 32

Subject: Targeted Budget Management (TBM) 2026/27 Month 2 (May)

Date of meeting: Thursday, 16 July 2026

Report of: Cabinet Member for Finance & City Regeneration

Contact Officer: Name: Elizabeth Griffiths, Director of Finance & Property
Haley Woollard, Deputy Chief Financial Officer
Email: elizabeth.griffiths@brighton-hove.gov.uk
haley.woollard@brighton-hove.gov.uk

Ward(s) affected: (All Wards)

Key Decision: Yes

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

For general release

1 Purpose of the report and policy context

- 1.1 The Targeted Budget Monitoring (TBM) report is a key component of the council's overall performance monitoring and control framework. This report sets out an indication of forecast risks as at Month 2 on the council's revenue and capital budgets for the financial year 2026/27. Effective financial management is a core component of providing a well-run council, a key priority within the Council Plan that demonstrates that the council manages within its finite resources and optimises the use of those resources.

2 Recommendations

- 2.1 Cabinet notes the forecast risk position for the General Fund, which indicates a potential forecast overspend risk of £19.882m
- 2.2 Cabinet notes the additional risks of £17.131m included in the table at Appendix 2 which are not included in the forecast figure above.
- 2.3 Cabinet notes the forecast overspend risk for the separate Housing Revenue Account (HRA), which is an overspend of £0.482m.
- 2.4 Cabinet notes the forecast overspend risk for the ring-fenced Dedicated Schools Grant, which is an overspend of £6.643m in year resulting in a cumulative deficit of £8.405m.
- 2.5 Cabinet approves a request to MHCLG for additional EFS – which is additional borrowing, repaid by further capital receipts - in 2026/27 of up to £30m, to be drawn down if required and discussed in 3.10 below.

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- 2.6 Cabinet notes the current RAG rating of the transformation workstreams at Appendix 3.
- 2.7 Cabinet notes the Treasury Management update at Appendix 4
- 2.8 Cabinet notes the Corporate Debtor position at Appendix 5
- 2.9 Cabinet approves the addition of new projects to the capital programme totalling £272k as set out in Appendix 6.
- 2.10 Cabinet notes the forecast position on the Capital Programme at Appendix 7 which shows budget variations of £4,283k.
- 2.11 Cabinet approves the capital budget variations of £6.672m and reprofiling of £8.328m set out in Appendix 7 and discussed at 3.16

3 Overview

- 3.1 The forecast outturn position at month 2 for the current financial year 2026/27 is an overspend of £19.882m with an additional table of risks totalling £17.131m

Directorate	TBM Budget Month 2 £'000	Forecast Outturn Month 2 £'000	Forecast Variance Month 2 £'000	Forecast Variance Month 2 %	Provisional Outturn 25/26 £'000	Movement 25/26 to Month 2 £'000
Families, Children & Wellbeing	92,795	96,474	3,679	4.0%	(845)	4,524
Homes & Adult Social Care	160,867	173,750	12,883	8.0%	10,810	2,073
City Operations	47,462	47,220	(242)	-0.5%	(11,005)	10,763
Central Hub	31,857	32,867	1,010	3.2%	(1,337)	2,347
Sub Total	332,981	350,311	17,330	5.2%	(2,377)	19,707
Centrally-held Budgets	16,807	19,359	2,552	15.2%	2,377	175
Total General Fund	349,788	369,670	19,882	5.7%	0	19,882

- 3.2 There are two main drivers for the shift in overall forecast vs budget this year. One is an increase in demand led services (Families, Children and Wellbeing and Homes and Adult Social Care). Both areas are reporting increases in not only the number of clients but the level of complexity. Adult Social Care are reporting a 6% increase in numbers compared to budget and a 5% increase in average costs. The outturn report for 2025/26 that went to Cabinet on the 29th of June 2026 noted an underlying overspend of circa £8m caused by pressures on the budget that, although mitigated by the release of centrally held reserves, could not be mitigated by the services. Where these were demand led, what was a partial year overspend in 2025/26 becomes an expected full year overspend in 2026/27 as clients receiving support at the end of last financial year continue into the current year.
- 3.3 All of these services report good progress on their transformation programmes which are having a positive effect on their position but are currently unable to keep pace with the rise in numbers and costs.
- 3.4 The other area with a notable change is City Ops. The underspend last year was increased by a release of £4.4m of provision, amassed predominantly in previous years, so the true underspend in 2025/26 is closer to £6.5m. This is still a significant movement. The 2026/27 budget setting took into account some previously identified surpluses within the base budget, meaning that

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underspends at the levels seen in previous years would not be achieved. The reduction in overspend also relates in part to several decisions taken to fund additional expenditure such as increases in the cost of concessionary bus travel, where the May 2026 cabinet report identified a pressure of approximately £1.5m, with the resulting pressure funded through savings and income streams within the 2025/26 underspend. As a result, these surpluses which contributed to previous favourable outturn positions have been absorbed to support recurring expenditure. The current forecast is hoped to improve but does not include the additional risks included in the table at Appendix 2.

- 3.5 Detailed reports on all areas are included in Appendix 1 which shows forecasts, explanations for notable variances, current and planned mitigations, savings delivery and supporting data for each service area.
- 3.6 Savings delivery across all areas is progressing well but the forecast has taken a view on current expectations of deliverability. The council has previously RAG rated all savings but has not always applied this reduction in estimation to the forecast position until later in the year. This has now been incorporated earlier. It increases the forecast overspend but is a more accurate reflection of current expectations. Efforts will continue throughout the year to increase the level of savings delivered and to find alternative savings to further reduce the overspend. Roughly 2/3 of budgeted savings were able to be delivered in 2025/26 and workshop sessions have been run with staff and senior leaders to discuss the reasons for this with the aim of increasing the percentage this year.

Directorate	● £'000	● £'000	● £'000	● £'000	● £'000	Total £'000
Families, Children & Wellbeing	0	400	0	968	248	1,616
Homes & Adult Social Care	0	0	0	23	0	23
City Operations	375	0	265	469	155	1,264
Central Hub	0	0	614	798	213	1,625
Centrally-held Budgets	0	0	450	1,550	0	2,000
Total General Fund	375	400	1,329	3,808	616	6,528

- 3.7 Savings linked to transformation are also progressing and the RAG rating and key risks on each project workstream are shown in Appendix 3. Work is underway to review all budgeted cross cutting programmes over the life of the MTFs to eliminate any double counting of savings already in service budget forecasts.

Directorate	● £'000	● £'000	● £'000	● £'000	● £'000	Total £'000
Families, Children & Wellbeing	0	204	767	50	0	1,021
Homes & Adult Social Care	0	829	6,235	7,871	300	15,235
City Operations	300	416	175	3,007	60	3,958
Central Hub	230	205	435	165	10	1,045
Centrally-held Budgets	1,125	0	0	0	0	1,125
Total General Fund	1,655	1,654	7,612	11,093	370	22,384

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- 3.8 Future project reporting will include two RAGs. One for project delivery and another for the expected achievement of savings, recognising that, as noted above for social care, it's possible to have a well-run project that does what it set out to do, but is unable to deliver the level of savings hoped for due to external factors. Separating the two RAG ratings will allow easy identification of any projects that require attention and conversely provide assurance on others even if the service is still forecasting an overspend. A concern has been flagged in the risk table for the organisational change saving, budgeted at £1.125m. Plans are continually being developed for this but much of what is in progress is already accounted for in service forecasts.
- 3.9 Appendix 1 also shows the expected variances on the Housing Revenue Account (HRA) and the Dedicated Schools Grant (DSG) which, while outside the reported revenue position of the Council are still the responsibility of the Council to manage. These are showing overspends of £0.482m and £6.643m respectively with the large overspend in the DSG being driven by increased demand in the High Needs Block.

EFS

- 3.10 An important impact of the TBM2 forecast position is that it exceeds available reserves. The Council closed last financial year (2025/26) with a general reserves balance of £7.913m. This will be increased by £4.160m of EFS already agreed, giving a total available reserves figure of just over £12m. This is significantly less than the forecast £20m overspend and the additional £17m of risks not included in that forecast. While we will continue to work to bring the forecast overspend down, it is clear that our forecast expenditure in 2026/27 is not met by our forecast income and funding, and therefore, to avoid a S114, we must approach MHCLG to ask for additional EFS funding. More work will follow on our recovery plans which will build on the excellent roadmap already laid out in our MTFS but nonetheless, additional funding will have to be sought.
- 3.11 This approach is necessary to manage the risk of the Council being required to file a S114 notice. The work to reduce the overspend is being undertaken by every service and will continue at pace but the Council is required to be able to fund its service expenditure within the current financial year and without further EFS, at this point in time it is unable to do that.
- 3.12 Cabinet are asked to approve the submission of a request to MHCLG for an additional amount of EFS of up to £30m in the current financial year.
- 3.13 As work develops on the budget for 2027/28 further requirements may emerge as, in the same way that the underlying budget pressures in demand led services from 2025/26 have continued into this financial year, they are expected, to some extent, to continue into next.

Treasury, Debt and Capital

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

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Appendix 4 and reports that all activities have been within approved parameters but notes a concern that if interest rates continue to rise, due mainly to macroeconomic factors, there is a risk that our capital financing cost could exceed budget substantially. The treasury team estimate that for every 1% increase in interest rates, our borrowing costs would increase by £780k per annum. This takes account of loans that are fixed for the current year but over time the impact would be increased as those loans become due for repayment and new expenditure increases.

- 3.15 New project capital funding requested in the period is relatively small and Cabinet are asked to approve the additional funds requested in Appendix 6.
- 3.16 Appendix 7 reports in detail on the performance of the capital programme and budget variances to existing projects. These are summarised below:

Summary of Capital Budget Movement		Reported Budget Month 2 £'000
Budget approved at TBM00, plus Outturn reprofiles/slippage and additional annual reports previously approved		264,684
Changes reported at other committees and already approved, to be included for TBM2		9,508
New schemes to be approved in this report (see Appendix 6)		272
Variations to budget (to be approved)		6,672
Reprofiling of budget (to be approved)		(8,328)
Slippage (to be approved)		0
Total Capital		272,808

- 3.17 The notable variations not previously agreed, where budget is increasing, are £3.519m additional grant allocation in high needs provision capital, £2.5m for disrepair capital works.
- 3.18 It is worth noting that the MTFP from 2027/28 onwards expects a saving in the revenue cost of the capital programme of £2.5m per annum. The graph at the bottom of the Treasury Management update shows the anticipated increase in these revenue costs over the life of the MTFS (an increase of £10m per annum) based on the current capital programme planned expenditure. Work is underway to identify capital expenditure that could be deferred or eliminated in order to achieve this reduction of £2.5m per annum from the current projection.
- 3.19 Appendix 5 shows aged debt across the organisation. Different areas of the Council record debt according to the processes used to collect in that area, so some may only regard it as an aged debt if it has been registered, some where it has a liability order. Provision has been made across these areas to varying levels, but work is required this year to review the recoverability of the older debt and ensure that there is sufficient resource available to collect outstanding debt.
- 3.20 All balances shown in this appendix are income that has been attributed to the Council at one time or another but the cash for this income has not been collected. This will become a regular reporting item.
- 3.21 Council Tax collection rates were on target for the month (0.32% down) while Business Rates were 3.2% down, driven in part by changes in large ratepayer's bills, but there is also evidence that more businesses are struggling to pay.

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4 Analysis and consideration of alternative options

- 4.1 The forecast outturn on General Fund budgets is an overspend of £19.882m with additional risks of £17m. This exceeds the Council's available reserves and likely ability to mitigate and therefore will require additional EFS to avoid a S114 as discussed at 3.10 above.

5 Community engagement and consultation

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

6 Financial implications

- 6.1 The financial implications are covered in the main body of the report and appendices but attention is drawn to the requirement for additional EFS discussed at 3.10. Financial performance is kept under review on a monthly basis by the Corporate Leadership Team and Cabinet and the management and treatment of strategic financial risks is considered by the Audit, Standards & General Purposes Committee.

Finance Officer consulted: Elizabeth Griffiths Date: 06/07/2026

7 Legal implications

- 7.1 Decisions taken in relation to the budget must enable the council to observe its legal duty to achieve best value by securing continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness. The council must also comply with its general fiduciary duties to its Council Tax payers by acting with financial prudence, and bear in mind the reserve powers of the Secretary of State under the Local Government Act 1999 to limit Council Tax & precepts.
- 7.2 The Council has a legal obligation to set a balanced budget on an annual basis as prescribed in the Local Government and Finance Act 1992 and associated Regulations. The recommendations contained in this report will assist in the discharge of that obligation. Cabinet will note the s 151 officer's view that Exceptional Financial Support is required in order to achieve a balanced budget and avoid a S114 Notice being required.

Lawyer consulted: Elizabeth Culbert Date: 07/07/2026

8 Risk implications

- 8.1 The risk in the forecast figures has been outlined in Appendix 2 which contains estimates of further risk from all services that have not yet been included in the forecast figures because of their level of uncertainty.
- 8.2 The larger risk in the report is that if the recommendation to request further EFS is not approved, the Council's Chief Financial Officer would be forced to file a S114 report on the grounds that expected expenditure in the current financial year cannot be met by expected income.

9 Equalities implications

- 9.1 There are no direct equalities implications arising from this report.

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10 Sustainability implications

- 10.1 An inability to balance the budget in the current financial year would require the Council to file a S114 report so the request for additional funds through EFS, in conjunction with continuing efforts to reduce this overspend must be pursued.

11 Health and Wellbeing Implications:

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

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

- 12.1 The position at TBM2 is a significant projected overspend driven by underlying pressures in service spending carried forward from 2025/26 and continuing into 2026/27. Savings have been evaluated based on current expectations of delivery which has increased the forecast but will continue to be pressed not only to increase the chances of success but to continuously find alternative savings to mitigate the position.
- 12.2 The forecast position requires the Council to approach MHCLG to request more Exceptional Financial Support for 2026/27, expected to be a sum of up to £30m. It should be noted that this is additional borrowing, not additional funding.

Supporting Documentation

Appendices

1. Forecast Dashboards by Service
2. Additional risks not included in the forecast
3. Update on the progress of Transformation programmes and key risks
4. Treasury Management update
5. Corporate Debt
6. New capital schemes
7. Capital programme performance

Revenue Budget Summary	Month 2	Forecast	Variance		DoT
	Budget	Outturn	Variance	Variance	To 25/26
	£'000	£'000	£'000	%	
Children in Care Placements	31,532	34,569	3,037	9.63%	↓
Disability Family Support	370	676	306	82.70%	↓
Children in Care Mental Health Contract	-	100	100	0.00%	=
Families First and Social Work	16,605	15,970	(635)	-3.82%	↑
Preventive (Section 17)	571	378	(193)	-33.80%	↓
In-House Residential & Respite	3,833	4,073	240	6.26%	↓
Fostering & Adoption	4,819	4,739	(80)	-1.66%	↓
Other	6,079	6,249	170	2.80%	↓
Total	63,809	66,754	2,945	4.62%	↓

Key Variances

The Children in care placements budget is likely to be difficult to manage despite mitigating initiatives, the main driver is high numbers and increasing unit costs of residential placements. The budget is 25.5 FTE and there are currently 29 children in placement. Intense effort is underway to move children on safely to foster care which is working but new children with complex, high risk needs then enter residential care, so there is turnover despite the number showing as static. In addition, there is an unachieved saving of £100k on the CiC mental health contract due to PH funding being redirected in 2025/26. These overspends are likely to be off-set this year by underspends on Families First and prevention which are currently shown in the Financial Recovery Plan. The forecast includes assumed savings achieved of £1.391m

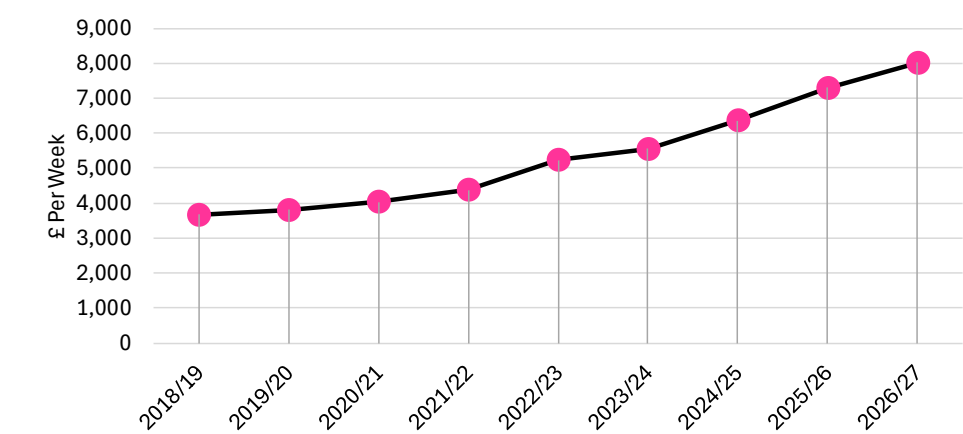
Risks & Mitigations

The Children’s Placements budget continues to face significant pressure as a result of increasing complexity of need, limited placement sufficiency and rising placement costs. A small number of children with acute safeguarding risks require highly specialised placements at substantial cost. In addition, current market conditions have reduced provider engagement with framework arrangements leading to the necessity to make more placements outside of the framework contract at higher rates. Ongoing challenges in foster carer recruitment continue to constrain family-based placement capacity and increase the use of more expensive alternatives. The number of children in care remains relatively stable, with demand pressures being effectively managed through high-quality social work intervention and the newly redesigned Families First multi-disciplinary service. Nevertheless, challenges associated with children with complex needs, the local care provider market, and constraints in fostering options have resulted in significant cost pressures on the placement budget.

Savings, Mitigations & Transformation

£'000	●	●	●	●	●	Total
Savings	-	100	-	582	42	724
Pressure mitigations	-	-	-	-	-	-
Transformation programmes	-	-	767	-	-	767
Total	-	100	767	582	42	1,491

Average residential placement unit costs



Average cost of residential home placements has increased considerably since 2023/24. A combination of children coming into care with significantly complex needs, local market conditions and external impacts of other factors like inflation and pay growth, has resulted in a 44% rise since March 2024.

Revenue Budget Summary	Month 2 Budget £'000	Forecast Outturn £'000	Variance £'000	Variance %	DoT To 25/26
English as an Additional Language and Traveller Service	-	405	405	0.00%	↓
Public Health contribution to Schools Wellbeing	(200)	-	200	100.00%	↓
Schools PFI	1,209	909	(300)	-24.81%	↓
Early years & Nurseries	884	884	-	0.00%	↓
Home to School Transport	9,152	9,567	415	4.53%	↓
Libraries	4,211	4,339	128	3.04%	↓
Community Cohesion	3,021	3,068	47	1.56%	↓
Other	10,709	10,548	(161)	-1.50%	↓
Total	28,986	29,720	734	2.53%	↓

Key Variances

Schools ceased de-delegation of funds to the English as an Additional Language and Traveller Service (EALTS) meaning that the service needs to operate on a fully traded basis. Income from schools is insufficient to maintain the previous level of service and a restructure is now planned. However, this will not take effect until later in the year meaning a significant overspend for the 2026/27 financial year. In addition, the previously agreed Public Health funding of £200k for the Schools Wellbeing Service has now been redirected leaving a shortfall in this budget. The Home to School Transport budget continues to be under pressure with current forecasts indicating that, on average, there will be 28 more pupils eligible for transport than originally anticipated in the budget. The impact of fuel price volatility has been accounted for in this forecast. The forecast includes assumed savings achieved of £0.642m

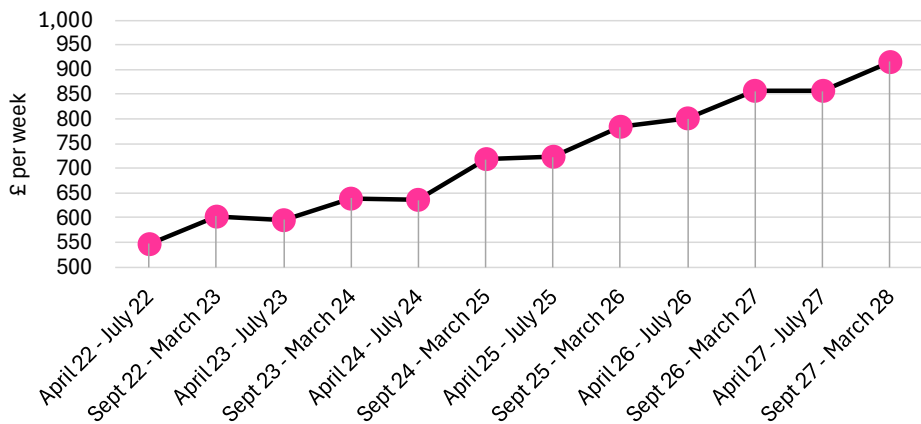
Risks & Mitigations

There remains a risk that pupil numbers from September will increase beyond the level assumed within the budget, which has been based on previous year trends. Together with ongoing volatility in the taxi market, this creates a risk of further pressure against the forecast outturn. Mitigating action continues to be taken through active cost management by the transport team, with particular focus on personal travel budgets and route optimisation.

Savings, Mitigations & Transformation

£'000	●	●	●	●	●	Total
Savings	-	300	-	386	206	892
Pressure mitigations	-	-	-	-	-	-
Transformation programmes	-	204	-	50	-	254
Total	-	504	-	436	206	1,146

No. of pupils transported by taxi to school or college



In recent years there has been a substantial increase in both the number of pupils eligible for transport and the average cost per pupil. Since the beginning of the 2022/23 financial year there has been an increase of 57% in the number of pupils transported by taxi and a 53% increase in the average cost.

Revenue Budget Summary	Month 2	Forecast	Variance	Variance	DoT
	Budget	Outturn			
	£'000	£'000	£'000	%	To 25/26
Individual Schools Budget	150,285	150,285	-	0.00%	=
Early Years Block	49,385	49,385	-	0.00%	↓
High needs Block (Excluding delegated to schools)	43,481	50,117	6,636	15.26%	↓
Exceptions & Central Services	2,787	2,794	7	0.25%	↓
Grant Income	(245,938)	(245,938)	-	0.00%	=
Brought Forward Deficit		1,762	1,762	0.00%	↓
Total	-	8,405	8,405	0.00%	↓

Key Variances

Significant adverse variances within High Needs Block budgets of the DSG. There are predicted in-year overspends across a range of budgets including mainstream and special schools top-up funding, external educational agency placements in independent non maintained schools, post-16 high needs provision and education other than at school. The overspends are predominantly being driven by increase in demand - the number of children with Education, Health and Care plans are continuing to go up by 12% per year, whilst unit costs are also increasing due to a rise in complexity of need. In line with government policy, the council is investing in early intervention and mainstream inclusion, however the benefits of this investment (reductions to higher cost placements) is unlikely to be seen until future years. The high needs block allocation received in 2026/27 is at a cash flat level with no uplift provided for growth or inflation factors.

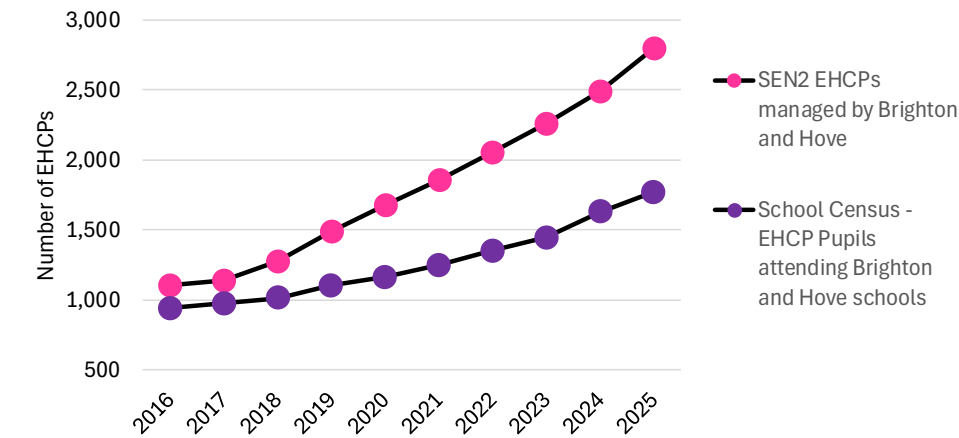
Risks & Mitigations

As is the case with the majority of councils across the country, the high needs budgets are facing significant challenges largely linked to the ongoing increase in children with Education, Health and Care plans. Forecasts for high needs budgets in 2026/27 include an assumed level of in-year growth based on similar trends seen in recent financial years. At the end of the 2025/26 financial year there was a cumulative overspend of £1.762m on the central DSG. Currently, the government is providing legislation known as the Statutory Override facility that means any deficit associated with the Central DSG is excluded from the council’s general fund. This facility runs until the end of 2027/28. The government’s reforms include a proposal to fund 90% of central DSG deficits to the end of the 2025/26 financial year via a High Needs Stability Grant. At this stage, it is not clear whether a similar arrangement will apply for central DSG deficits arising in 2026/27 and 2027/28.

Savings, Mitigations & Transformation

£'000						Total
Savings	-	-	-	-	-	-
Pressure mitigations	-	-	-	-	-	-
Transformation programmes	-	-	-	-	-	-
Total	-	-	-	-	-	-

Number of Pupils with Education, Health and Care Plans



The graph shows the continual increase in pupils with EHCPs over a ten year period from 2016 to 2025. The number managed by Brighton and Hove has more than doubled over this timeframe with increases in the most recent years being at a higher rate than earlier in the time period.

Revenue Budget Summary	Month 2	Forecast	Variance	Variance	DoT
	Budget	Outturn			
	£'000	£'000	£'000	%	To 25/26
Community Care - Physical & Sensory Support	32,094	40,152	8,058	25.11%	↓
Community Care - Learning Disabilities	50,499	50,931	432	0.86%	↓
Community Care - Memory & Cognition	11,547	11,689	142	1.23%	↓
Community Care - Mental Health	13,507	15,475	1,968	14.57%	↑
Assessment teams	14,946	14,963	17	0.11%	↓
In-house services	11,336	12,015	679	5.99%	↓
Commissioning & Partnerships	5,884	5,955	71	1.21%	↓
Total	139,813	151,180	11,367	8.13%	↓

Key Variances

The projected overspend on Community Care placement and packages of care totals £10.6m due to the number of clients being support and the average unit cost of care being above budgeted levels. The total financial recovery plan for Adult Social Care totals £10.115m, with £5.903m achieved and £4.212m anticipated to be achieved and reflected in the forecast. The Adult social care and commissioning departments continue to implement a strengths-based approach across key work streams in adult social care, ensuring robust pathways are in place, developing a community reablement offer and re-designing the front door service.

The community care demand is exceeding budgeted levels with 4,387 WTE forecast as at TBM2 against a budgeted WTE of 4,375. The forecast average unit cost of care is £552 per week against a budget of £471 per week.

Risks & Mitigations

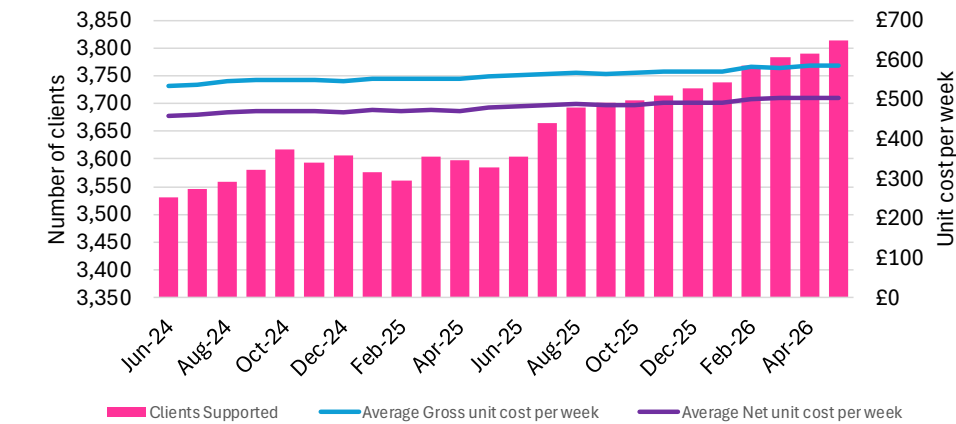
The Adult Social Care budget is facing significant challenges in mitigating the risks from increasing demands and managing the unit costs, where pressures in the independent sector continue to rise at a pace above general inflation.

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

Savings, Mitigations & Transformation

£'000	●	●	●	●	●	Total
Savings	-	-	-	23	-	23
Pressure mitigations	-	-	-	-	-	-
Transformation programmes	-	-	4,212	5,880	-	10,092
Total	-	-	4,212	5,903	-	10,115

ASC Community Care Activity and Unit Costs



The graph shows the significant increase in ASC clients support over the last 2 years (8% since June 2024) and the steady ongoing increase unit costs of care

Revenue Budget Summary	Month 2	Forecast	Variance		DoT
	Budget	Outturn	Variance	Variance	
	£'000	£'000	£'000	%	To 25/26
Temp Accommodation (TA) and Allocations	14,641	15,945	1,304	8.91%	↑
TA Management & Support	804	1,014	210	26.12%	↓
Rough Sleeper & Housing related Support Services	4,455	4,455	-	0.00%	↓
Travellers	397	397	-	0.00%	↓
Private Sector Housing	577	586	9	1.56%	↓
Housing Strategy and Enabling	180	173	(7)	-3.89%	↑
Total	21,054	22,570	1,516	7.20%	↑

Key Variances

The forecast position continues to be driven by demand-led pressures within Temporary Accommodation (TA), with sustained demand and limited move-on options constraining cost reduction. The TA Reduction Plan remains critical, with a continued shift from high-cost nightly accommodation towards increased block provision; however, delivery is impacted by system flow and market capacity.

The forecast assumes an overspend on accommodation costs of £1.304m, within a total accommodation pressure of £3.538m, offset by anticipated savings of £2.023m, resulting in a net overspend of £1.516m. This reflects higher unit costs and continued reliance on nightly provision. Staffing is also forecast to overspend by £0.210m, alongside a further £0.750m pressure relating to an ongoing legal dispute. Nightly accommodation is forecast to reduce from 444 to 181 households by March 2027, while block provision increases from 659 to 833. PSL numbers are expected to remain broadly stable. Demand remains high, and cost reduction remains a key priority.

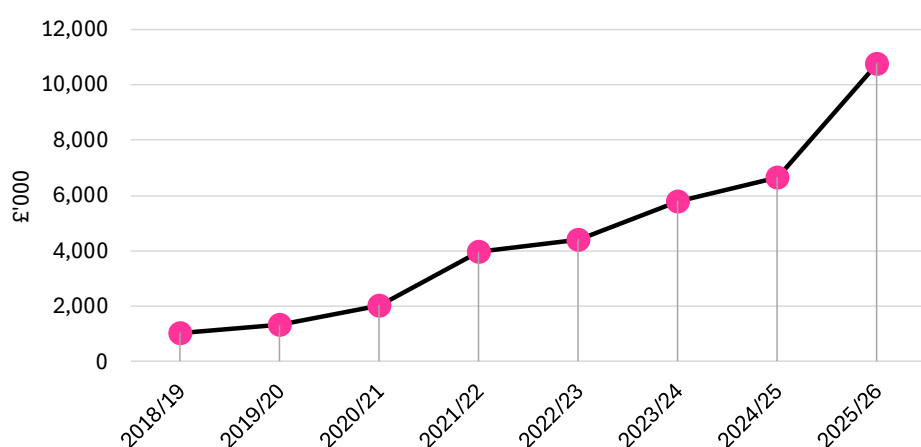
Risks & Mitigations

This highlights ongoing financial and operational risks driven by increasing demand for temporary and emergency accommodation, rising rental costs, and reduced availability of lower-cost leased properties. Mitigations focus on delivering a Temporary Accommodation Reduction Plan, including preventing homelessness, supporting move-on to sustainable housing, increasing the use of lower-cost provision, and improving income collection and cost efficiency.

Savings, Mitigations & Transformation

£'000						Total
Savings	-	-	-	-	-	-
Pressure mitigations	-	-	-	-	-	-
Transformation programmes	-	829	2,023	1,991	300	5,143
Total	-	829	2,023	1,991	300	5,143

Emergency Accommodation spend since 2018/19



The graph shows a rise in the use of emergency accommodation over time, reflecting increasing immediate housing need and reduced access to settled temporary options. There has also been a clear shift towards more expensive spot-purchased (nightly) accommodation, which remains the highest cost form of provision and continues to drive in-year pressure.

The forecast assumes a downward trend in costs as more cost-efficient accommodation is brought into use.

Revenue Budget Summary	Month 2	Forecast	Variance	Variance	DoT
	Budget	Outturn			
	£'000	£'000	£'000	%	To 25/26
Repairs & Maintenance	19,422	19,822	400	2.06%	↓
Housing Management & Support	6,798	6,730	(68)	-1.00%	↓
Housing Investment & Asset Management	4,898	4,170	(728)	-14.86%	↑
Housing Strategy & Supply	2,134	2,094	(40)	-1.87%	↓
Tenancy Services	16,279	16,779	500	3.07%	↓
Council-owned Temporary Accommodation	1,412	1,588	176	12.46%	↑
Rent & Service Charges	(81,972)	(81,978)	(6)	-0.01%	↓
Capital Financing Costs	14,015	14,015	-	0.00%	↓
Direct Revenue Funding	17,014	17,262	248	1.46%	↓
Total	-	482	482	0.00%	↑

Key Variances

The HRA continues to experience significant cost pressures, particularly from disrepair claims, which are inherently volatile and difficult to forecast and will be closely monitored. Annual costs are forecast at approximately £2m, partially offset by a £1m earmarked reserve in line with the 2026/27 budget.

Enhanced security and safety requirements across several high-rise blocks, including fire and electrical compliance, are contributing to a projected £0.3m overspend at Month 2. There are also increased costs of £0.4m relating to voids and repairs within council-owned temporary accommodation (TA). This is partially offset by increased net rental income following Cabinet approval in April to raise TA rents to full LHA levels, although void performance will require ongoing monitoring.

Tenancy Services continues to face pressure from regulatory requirements, a more vulnerable client base and financial constraints. Despite rising complexity, stabilisation of Universal Credit accounts and targeted interventions are supporting improved rent collection and tenancy sustainment.

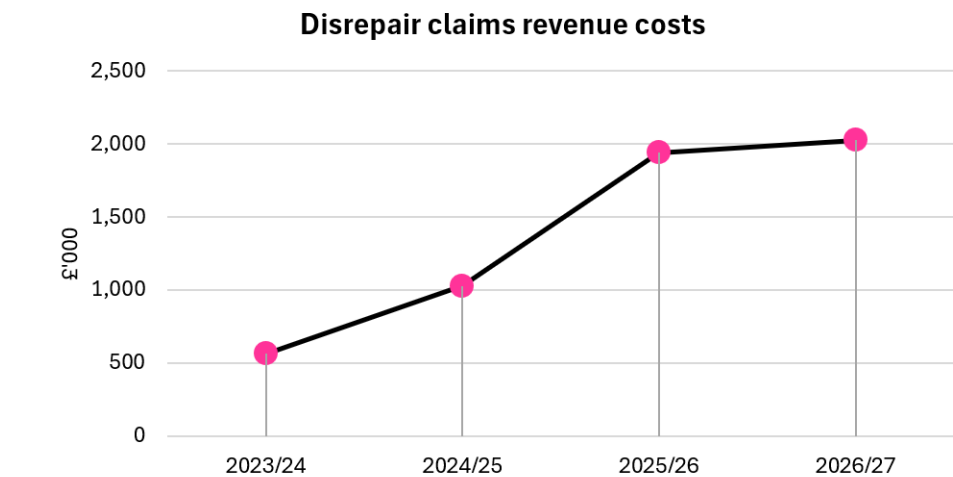
Risks & Mitigations

The HRA continues to face significant uncertainty regarding the financial position, there are major risks that need to be addressed and monitored to ensure that the position remains stable. These risks include but are not limited to: volume of Health & Safety compliance, delays related to Building Safety compliance, disrepair claims, rent arrears and collection rate.

The HRA will continue to review spend to try to improve the current financial position. Any variations will be reported to future Cabinet meetings during 2026/27. Officers are part of the London Directors of Housing Group and will endeavour to work with peers, as well as working with the Housing leads in the LGA, to explore how central government can support social landlords in investing in safety and quality improvements whilst also seeking to increase supply.

Savings, Mitigations & Transformation

£'000						Total
Savings	-	-	-	-	-	-
Pressure mitigations	-	-	-	-	-	-
Transformation programmes	-	-	-	-	-	-
Total	-	-	-	-	-	-



This shows growth in revenue costs for disrepair claims, covering legal and professional fees and compensation. Costs of the disrepair works are charged to capital, given the nature of the works undertaken.

Revenue Budget Summary	Month 2	Forecast	Variance	Variance	DoT
	Budget	Outturn			
	£'000	£'000			
City Infrastructure	47,173	48,308	1,135	2.41%	↑
Culture & Environment	20,668	21,046	378	1.83%	↓
Environmental Services	43,404	43,355	(49)	-0.11%	↑
Place	5,114	4,971	(143)	-2.80%	↑
Digital Innovation	9,410	9,326	(84)	-0.89%	↓
Total	125,769	127,006	1,237	0.98%	↑

Key Variances

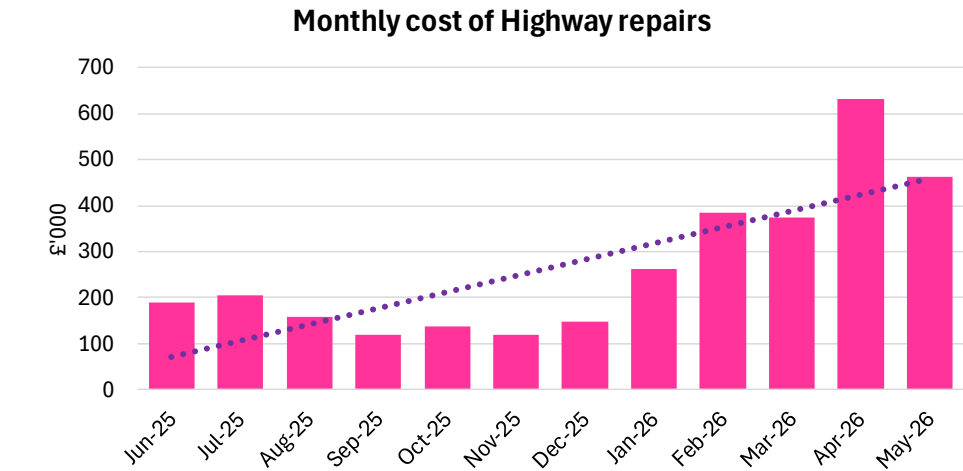
Key expenditure variances are driven by City Infrastructure pressures, mainly Concessionary Fares (£1.547m) and Highway repairs (£0.328m), partly offset by staffing, consultancy and initiative underspends. Culture & Environment is under pressure from Venues and Events (£1.022m), with smaller pressures in Seafront Services and Museum and Culture, offset by underspends in Sport and Leisure (£0.327m), City Parks (£0.212m) and Bereavement (£0.118m). Environmental Services is broadly balanced, with Fleet & Maintenance pressure (£0.920m) offset by Strategy and Service Improvement (£0.911m) and operational staffing savings. Place is forecasting an underspend, mainly from Development Planning staffing vacancies (£0.559m), partly offset by Architecture & Design fee income pressure (£0.280m) and corporate savings yet to be allocated (£0.135m).

Risks & Mitigations

Key risks include Concessionary Fares, with Compass moving to a claims basis and the forecast rising from £0.257m to £0.365m. Further risks include additional arboriculture disease work, extra collection resources, high agency spend, ageing fleet hire costs and no carry forward for project resource. Mitigations include using remaining Environmental Services innovation funding and reviewing vacant Building Control posts before adding resources. There is a risk that the Highway repairs will increase by a further £0.600m based on the spend profile from the first two months of the year and assuming spend reverts back to last years average. Mitigations such as capitlaising eligible costs funded by grant are being considered.

Savings, Mitigations & Transformation

£'000	●	●	●	●	●	Total
Savings	375	-	265	348	155	1,143
Pressure mitigations	-	-	-	-	-	-
Transformation programmes	-	-	110	-	60	170
Total	375	-	375	348	215	1,313



Forecast expenditure for the year is £3.2m based on spend incurred since April 2026 and assuming a spend profile for the remaining 10 months which is consistent with the same period in 2025/26. £0.6m has been excluded from the forecast, but highlighted as a risk with the view that this could be mitigated. Future reports may need to include cost.

Revenue Budget Summary	Month 2	Forecast	Variance	Variance	DoT
	Budget	Outturn			
	£'000	£'000			
City Infrastructure	(53,507)	(54,103)	(596)	-1.11%	↓
Culture & Environment	(11,813)	(13,552)	(1,739)	-14.72%	↑
Environmental Services	(10,277)	(9,887)	390	3.79%	↓
Place	(2,530)	(2,148)	382	15.10%	↓
Digital Innovation	(180)	(96)	84	46.67%	↓
Total	(78,307)	(79,786)	(1,479)	-1.89%	↓

Key Variances

Income variances show a mixed position. Parking is forecasting a £0.152m surplus, dependent on MTFS delivery, with pressures in PCNs (£0.260m), permits (£0.100m) and off-street parking (£1.100m) offset by surpluses in suspensions (£1.100m), on-street parking (£0.380m) and EV charging (£0.160m). Culture & Environment has significant favourable variances, including shows income supporting (£1.034m), table and chairs income (£0.352m), leisure management fees (£0.363m), parks parking (£0.194m) and seafront rents (£0.147m). Environmental Services pressures include unachieved vehicle sales savings (£0.100m) and an unachievable textiles income target (£0.301m). Place is showing a net income pressure, mainly Building Control (£0.675m), partly offset by planning income (£0.105m) and grants supporting staffing (£0.149m). Digital Innovation has an £0.084m pressure from reduced schools traded services and partner recharges.

Risks & Mitigations

Key risks are parking income pressures, with Barrier car parks £1.1m adverse, including £0.5m at London Road, assuming King Alfred and Norton Road remain open and at full activity. PCN pressure of £0.26m is partly offset by suspension mitigations. Savings at risk include Red Routes and paid parking in light-touch zones, both forecast at 50% achievement due to delays and challenge. Monitoring of Black Rock income remains important, as underachievement could increase in-year pressure.

Savings, Mitigations & Transformation

£'000						Total
Savings	-	-	-	121	-	121
Pressure mitigations	-	-	-	-	-	-
Transformation programmes	300	416	65	3,007	-	3,788
Total	300	416	65	3,128	-	3,909

Parking Strategy

In 26/27 resident, traders, and business permits have been increased in line with inflation (3%) while other permits remain frozen for a second year. The exception to this is visitor and hotel permits which see an above inflation increase except in Light Touch zones which are frozen. In line with the Parking Review recommendation, we have worked to make our barrier carparks more attractive by freezing visitor tariffs and introducing new early bird, commuter and late-night tariffs in some locations. We have also worked to simplify on-street parking charges including a new unified seafront parking tariff from Maderia Drive to the King Alfred aimed at the visitor economy. A key element will be driving up utilisation of parking through the creation of a commercial website and enhanced marketing initiatives.

Revenue Budget Summary	Month 2	Forecast	Variance	Variance	DoT
	Budget	Outturn			
	£'000	£'000	£'000	%	To 25/26
Cabinet Office	1,179	1,159	(20)	-1.70%	↓
Corporate Leadership Office	1,107	1,107	-	0.00%	↑
Finance & Property	7,276	8,371	1,095	15.05%	↑
Governance & Law	5,008	4,588	(420)	-8.39%	↓
People & Innovation	14,148	14,503	355	2.51%	↓
Contribution to Orbis	3,139	3,139	-	0.00%	↓
Total	31,857	32,867	1,010	3.17%	↓

Key Variances

Property Services : combination of underachievement of rental income and operation costs (corporate landlord charges) pressures resulting in an estimated income shortfall of £0.738m across the service.

WRBS : Budget pressure of £0.342m at TBM2, driven by a combination of underachievement of income from schools and courts, alongside pressures from software licensing costs and staffing within Council Tax.

Finance : Pressure is primarily driven by a combination of expected staffing overspends (£0.085m) and increased audit costs (£0.050m).

Governance and Law - Overachievement of income in Local Land Charges (131K),due to come to an end following the transfer of this service to HMLR. In addition there are a number of staffing vacancies and requirements for software investment which are under review.

Facilities and Building Services : Higher than expected utility and cleaning costs.

Risks & Mitigations

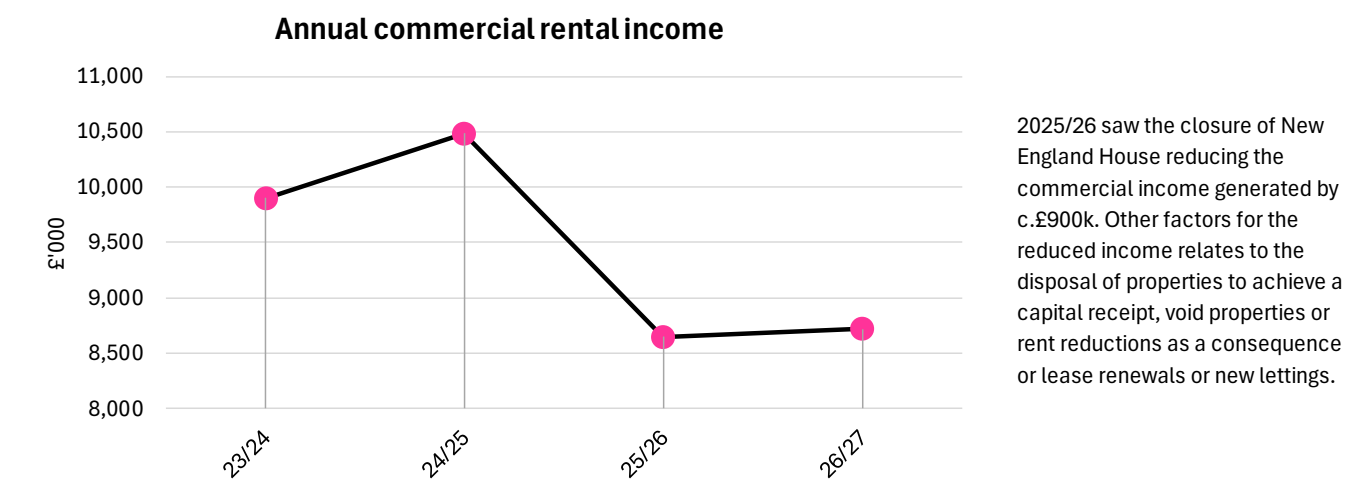
Facilities: Risk of not realising the full savings for landlord service costs and PMB in Facilities and Building Services from the sale of commercial and operational properties £0.497m

WRBS : Risk relating to underachievement of schools income and overspends on software licenses with limited mitigation options.

Property services : Risk associated with full savings not being realised from the sale of commerical and operational properties (£0.312m)

Savings, Mitigations & Transformation

£'000	●	●	●	●	●	Total
Savings	-	-	614	798	213	1,625
Pressure mitigations	-	-	-	-	-	-
Transformation programmes	230	205	435	165	10	1,045
Total	230	205	1,049	963	223	2,670



Revenue Budget Summary	Month 2	Forecast	Variance	Variance	DoT
	Budget	Outturn			
	£'000	£'000	£'000	%	To 25/26
Bulk Insurance Premia	4,565	4,665	100	2.19%	↑
Capital Financing Costs	13,453	13,906	453	3.37%	↓
Levies & Precepts	258	258	-	0.00%	=
Unallocated Contingency & Risk Provisions	3,535	3,535	-	0.00%	↓
Unringfenced Grants	(15,000)	(15,000)	-	0.00%	↑
Housing Benefit Subsidy	3,099	3,520	421	13.59%	↑
Other Corporate Items	6,897	8,475	1,578	22.88%	↓
Total	16,807	19,359	2,552	15.18%	↓

Key Variances

The Housing Benefit Subsidy budget has been overspent for a number of years due to rising subsidy lossresulting from a number of vulnerable clients that the council cannot claim full susidy for. Despite £2.000m pressure funding being included in 2026/27 to fund these rising costs, TBM2 indicates a £1.091m pressure. However, mitigation actions are being undertaken, which is expected to reduce the pressure by at least £0.670m. The pay award offer for 2026/27 has been announced at 3.30%, which is higher than budgeted, which would creates a pressure of £0.946m. There is a pressure arising from the timing of Business Rates retention (£0.730m) as a result of needing to use of the timing reserve to fund the reduced Section 31 grants due to changes in appeals provision and small business rates relief in 2025/26. The financing cost budget overspend is driven by a combination of increased cost of borrowing and switching up to £17m of capital receipts to borrowing in order to prioritise the use of capital receipts for transformation activity.

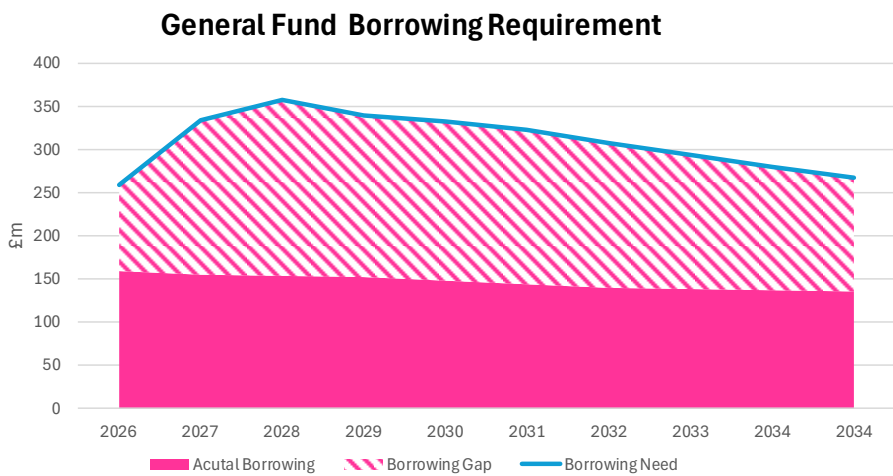
Risks & Mitigations

A Housing Benefit Subsidy working group is working on a strategy to reduce the pressure in this area, by working with providers to explore options to register as Registered Social Landlords in order to reduce the loss on these claim types. This work is in progress, and at least one major provider is on track for this during 2026/27, which has been included in the forecast.

With rising interest rates due primarily impacted by the war in Iran, there is a risk that new borrowing is undertaken at a higher rate than budgeted. The forecast includes 5.15% for new borrowing. Every additional 0.10% equates to a full year interest cost of £0.104m based on the current borrowing need for 2026/27. Borrowing costs are being monitored closely with the council's treasury advisors to try and obtain cost effective borrowing within a volatile market.

Savings, Mitigations & Transformation

£'000	●	●	●	●	●	Total
Savings	-	-	450	1,550	-	2,000
Pressure mitigations	-	-	-	-	-	-
Transformation programmes	1,125	-	-	-	-	1,125
Total	1,125	-	450	1,550	-	3,125



The graph shows the funding gap between the need to borrow to support the capital programme versus the actual borrowing portfolio. The general fund has a gap of up to £180m in 2026/2 which will be met by a combination of using the cash from internal reserves, and external borrowing.

Risk Month 2

Area	£'000	Explanation of Key Risks
Family Help & protection	1,200	Risk that financial recovery measures will not be realised in demand led budgets due to factors beyond the control of the service.
Total Families, Children & Wellbeing	1,200	
Adult Social Care - Community Care	600	Risk of provider fee negotiations exceeding budget
Adult Social Care - Community Care	4,283	Insufficient growth allowed for demand in the remainder of the financial year
Adult Social Care	4,212	Risk of anticipated savings not reducing forecast spend due to increasing demand
Housing	2,023	Risk of anticipated savings not reducing forecast spend due to increasing demand
Fuel prices and Utility costs	28	The projected risk reflects general fund costs and doesn't include: - £0.263m projected for the Housing Revenue Account - additional costs related to specific contracts
Total Homes & Adult Social Care	11,146	
Environmental Services - Network management	600	Risk of increased cost related to the reactive maintenance funding inline with the council's basic safety maintenance policy then, based on last years spending, spend will exceed budgets by end of October 2026.
Utilities and Fuel	391	Inflation risk related to the cost of utilities (6%) and fuel (30%) based on the current forecast.
Investment in Environmental Services	900	Investment required to meet zero missed bins collection.
Total City Operations	1,891	
Utilities and Fuel	134	Inflation risk related to the cost of utilities (6%) and fuel (30%) based on the current forecast.
People & Innovation - Facilities	435	Risk of not realising the full savings for landlord service costs and PMB in Facilities and Building Services from the sale of commercial and operational properties.
Total Central Hub	569	
Sub Total	14,806	
Other Corporate Items	1,200	Potential costs following the consultation on the closure of Middle Street Primary school and the Merger of Stanford infant and Junior schools.
Other Corporate Items	1,125	There is a risk associated with not realising savings from Organisational Change programme.
Total Centrally-held Budgets	2,325	
Total General Fund	17,131	

Appendix 3 – Innovation & Transformation Portfolio Savings Dashboard

The Innovation & Transformation portfolio delivers £74.4m of the £93m total savings target within the four-year Medium Term Financial Strategy. Savings performance is tracked through BGRAG ratings: Blue (delivered), Grey (in development), Red (high risk), Amber (managed risk), and Green (on track). The rating shown represents the dominant status within each programme.

Strategic Programme Name	Savings target across MTFS	Savings BGRAG rating 2026/27	Key risks/issues/dependencies
Adult Social Care Transformation	£23.592m	Green	Increased complexity of need in eligible residents. Wellington House saving requires Cabinet approval for alternative day options for residents with a learning disability to be delivered by the independent sector.
Families, Children & Wellbeing Transformation	£6.875m	Amber	Increased numbers of children with Special Education Needs and Disabilities and complex needs resulting in greater home to school transport case allocation
Homes & Homelessness	£10.587m	Amber	Resourcing plan and strategy to achieve new homes will include leasing options as well as acquisitions to minimise risk of market saturation.
Procurement, Commissioning & Contract Management	£4.000m	No savings target in 26/27	Work plan will need to be supported through wider communications to services on this programme and the implications on individual procurement activity for the year ahead.
Income & Commercialisation	£10.213m	Green	The programme team is preparing a forward plan of income opportunities to support Legal, Property and Procurement in the planning of their resources.
Asset Strategy (operational)	£3.023m	Amber	There are challenges around delivery of operational savings targets. A consultant's report is expected in the autumn, which will inform the approach to rationalisation of the operational portfolio
Asset Strategy (capital)	£53.867m	Grey	Reprofiling of the target across the 4 years will be required.
Organisational Transformation	£7.210m	Grey	Need for additional capacity and capability to deliver transformation – a business case including the use of delivery partner and additional programme and communication resource will be presented to CLT for approval.
Digital Innovation & Technology	£8.914m	No savings target in 26/27	Work is in progress to allocate savings to directorates to resolve any challenges around double-counting.

Appendix 4 - Treasury Management Update

Treasury Management Activity

Borrowing Movement Investments Movement

	£'000		£'000	
Opening Balances 1 April 2026	(520,296)		47,302	
Long-Term Borrowing raised (General Fund)	-	=	-	=
Long-Term Borrowing raised (HRA)	(35,000)	↑	-	=
Long-Term Borrowing repaid (General Fund)	2,322	↓	-	=
Long-Term Borrowing repaid (HRA)	37,678	↓	-	=
Short Term Borrowing raised	(10,000)	↑	-	=
Short Term Borrowing repaid	5,000	↓	-	=
Investments made	-	=	36	↑
Investments maturing	-	=	-	=
Net Money Market Transactions	-	=	(15,899)	↓
Closing Balances 31 May 2026	(520,296)	=	31,440	↓

Key Activities

Treasury Management activity during the period has focused on ensuring the authority has sufficient liquidity to fund day-to day expenditure through investing available cash in instant access Money Market Funds (MMFS); and undertaking borrowing when required to meet temporary liquidity need, refinance maturing debt and support the council's ongoing capital financing requirement. One new PWLB HRA loan of £35.000m was undertaken in the period at a rate of 4.69% for a term of 3 years to refinance maturing debt. In April, a market LOBO loan with Dexia of £5.000m that was subject to an interest rate review was repaid to avoid being exposed to a significant rate increase.

Investment Performance

The council's investment portfolio (adjusted for pooled funds) achieved an average rate of 3.87% in the period, outperforming against the SONIA benchmark rate of 3.73%. Investment balances have been largely maintained in liquid MMFs, where returns usually follow at around Base Rate, reflected in the yield performance below.

Investment Performance

	April to Sept 2025/26	Oct to March 2025/26	April - May 2026	DoT
Average Investment Rate	4.48%	4.15%	3.87%	↓
SONIA Benchmark Rate	4.19%	3.83%	3.73%	↓
Performance against benchmark rate	0.29%	0.32%	0.14%	
	✓	✓	✓	

Borrowing Summary

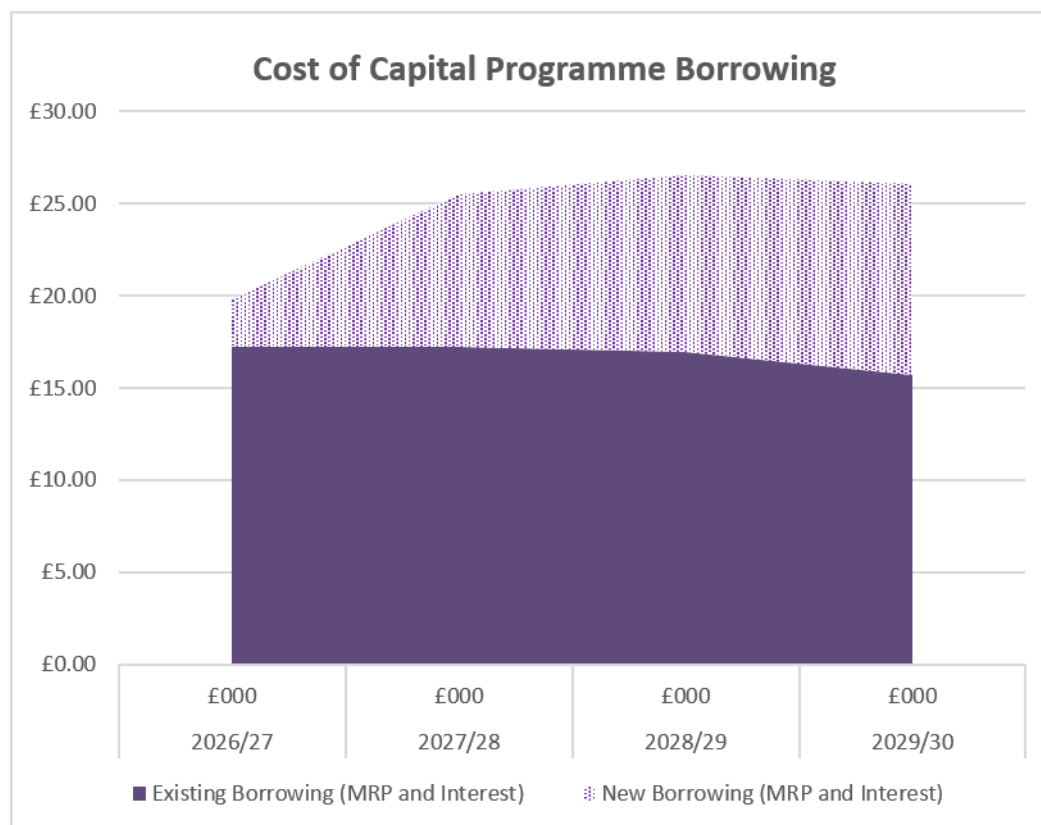
Total borrowing at the end of the period was £520.296m held at an average rate of 3.28% as set out in the table below. The level of borrowing continues to be within the council's Capital Financing Requirement and limits set as part of its approved Treasury Management Strategy. The average rate of borrowing continues to be within budgeted rates for the current financial year.

Borrowing Summary as at 31 May 2026

	General Fund £'000	HRA £'000	Total £'000	Average Rate %
PWLB	143,335	341,961	485,296	3.21%
Market Loans	13,930	16,070	30,000	4.33%
Short Term Borrowing	5,000	-	5,000	4.10%
Total Borrowing	162,265	358,031	520,296	3.28%

Risks & Mitigations

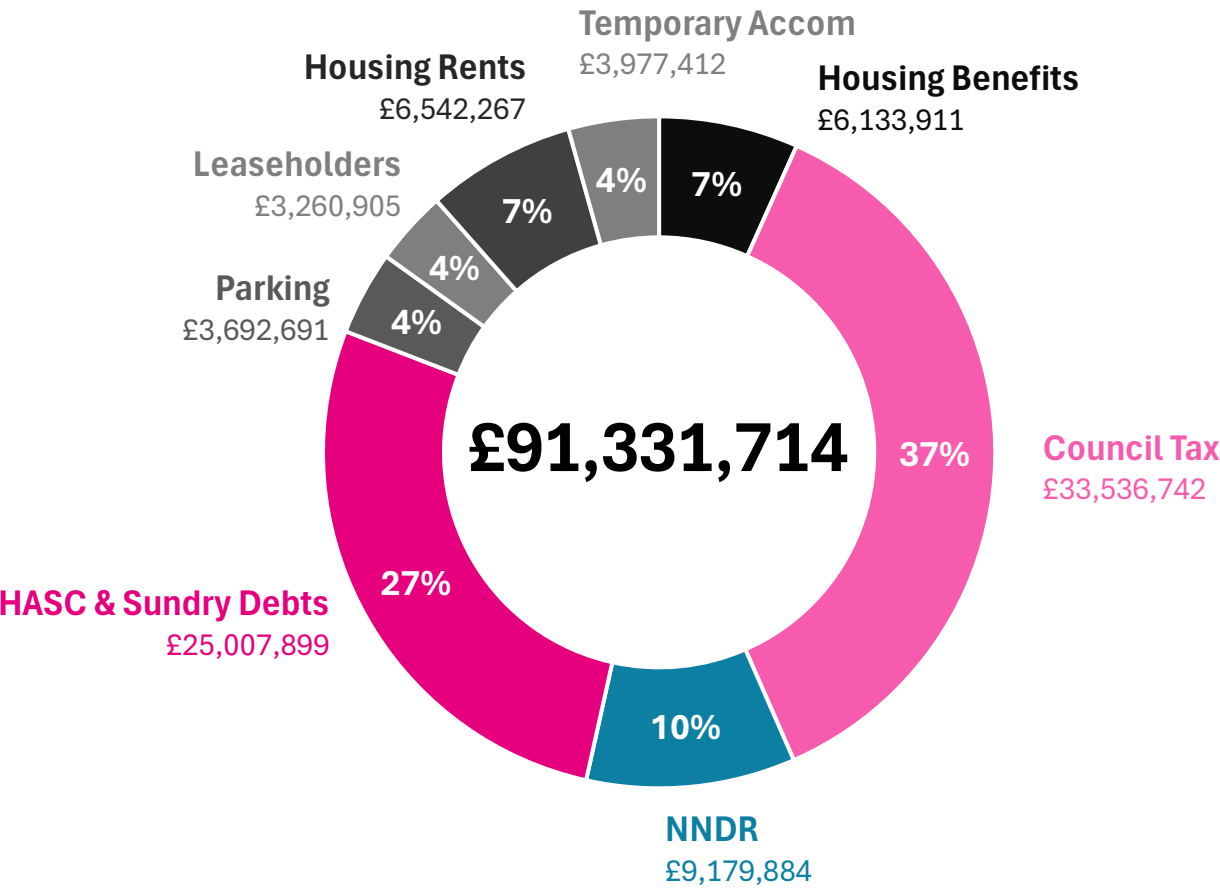
The council sets a number of indicators and limits within its approved Treasury Management Strategy to ensure any treasury management decisions are in accordance with the council's risk appetite. With interest rates on borrowing currently elevated and volatile, impacted by the war in Iran, there is a risk that new borrowing is undertaken at a higher rate than budgeted. Borrowing costs are being monitored closely with the council's treasury advisors to seek cost effective borrowing within a volatile market, with the option to undertake short term borrowing to manage more immediate liquidity need if required.



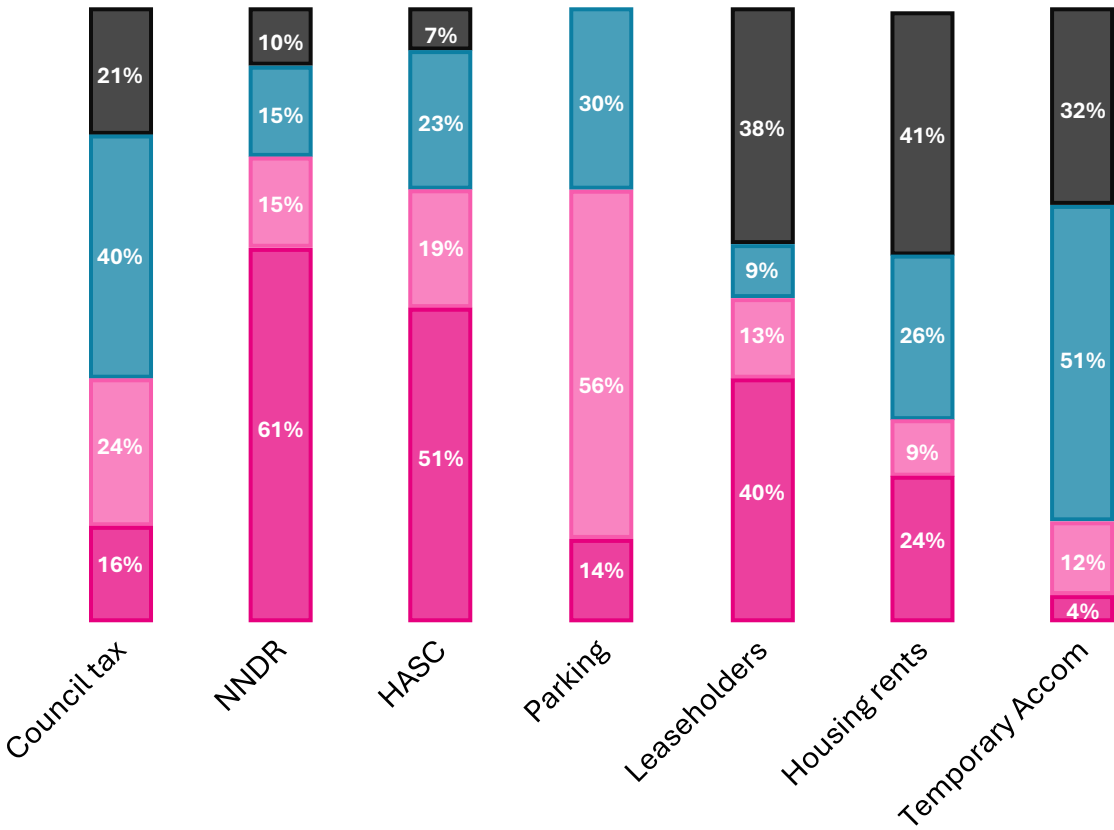
The lower portion of the graph shows the revenue cost (MRP and interest) of the current capital borrowing while the top half of the graph shows the revenue cost of planned capital expenditure that has not yet happened. It shows the impact on the revenue budget of an additional £10m per annum by the end of the MTFS taking the total to over £26m per annum, an increase of circa 60%

HUB	Total debt	Age of debt in years							
		0 - 1	1 - 2	2 - 3	3 - 4	4 - 5	5 - 6	6 - 7	7+
Housing Benefits	£6,133,911	-	-	-	-	-	-	-	-
Council Tax	£33,536,742	£5,266,352	£7,952,840	£6,844,098	£3,692,246	£2,851,950	£3,743,096	£1,074,144	£2,112,013
NNDR	£9,179,884	£5,583,654	£1,352,638	£754,214	£383,893	£231,793	£406,150	£92,097	£375,441
HASC & Sundry Debts	£25,007,899	£12,823,969	£4,786,708	£3,031,408	£1,620,358	£999,939	£421,103	£496,917	£857,825
Parking	£3,692,691	£504,218	£2,081,851	£701,140	£405,367	£116	-	-	-
Leaseholders	£3,260,905	£1,300,549	£412,391	£160,973	£83,611	£49,936	£34,218	£172,420	£1,046,807
Housing rents	£6,542,267	£1,547,087	£614,309	£645,474	£714,605	£367,673	£145,215	£127,550	£2,380,354
Temporary Accom	£3,977,412	£177,521	£470,963	£766,159	£598,257	£683,458	£298,556	£292,349	£690,149
Total	£91,331,714	£27,203,352	£17,671,701	£12,903,467	£7,498,337	£5,184,866	£5,048,340	£2,255,479	£7,462,589

Debt by service



Age of debt by service



New 2026/27 Capital Schemes for approval

Project Title	Directorate	Total Cost £K	Annual Cost £K	Funding Source	26/27 £K	27/28 £K	28/29 £K	29/30 £K
Families First Service Transformation	FCW	214	27	Borrowing	214			

The Local Authority must implement changes to its services as part of the mandatory Families First Programme. As part of this transformation it has been identified that co-location of new Family Help pods (small teams of social workers and keyworkers) with the Family Hubs would support the objectives of this programme and enable savings to be achieved in future years (£2.473m over the following 3 years). It has been identified that Tarner and Moulsecoomb Family Hubs have space that could be used for 4 Family Help pods each. It is urgent that the necessary work at these hubs is agreed so that the move to the new structure in September.

Refurbishing the family hubs will support delivery of the Families First restructure. The programme is expected to deliver savings of £2.473m over the MTFS period. Annual loan servicing costs are estimated at £0.027m and have been included in the programme's spending plan. The total annual cost of the Families First Programme is £3.541m, funded through a mix of Government grant and existing General Fund resources.

Project Title	Directorate	Total Cost £K	Annual Cost £K	Funding Source	26/27 £K	27/28 £K	28/29 £K	29/30 £K
Tudor House minibus	FCW	58	10	Borrowing	58			

Tudor House urgently requires a new minibus to ensure the safe and effective transport of children and young people with disabilities. The current vehicle is increasingly unreliable, frequently out of service for repairs, and incurs rising maintenance costs. A replacement is essential to maintain service continuity, safeguard children, and support the operational needs of the home.

The estimated cost of the new electric minibus and charging point is £0.058m. The purchase will be funded through borrowing, with loan costs charged to the Tudor House revenue budget. Repayment over 7 years is estimated at approximately £0.010m per annum, and provision has been identified within the existing budget.

Families, Children & Wellbeing – Capital Budget Summary

Forecast Variance Month 0 £'000	Unit	Reported Budget Month 0 £'000	Reported at Other Committees £'000	New Schemes £'000	Variations £'000	Slippages & Reprofiles £'000	Reported Budget Month 2 £'000	Forecast Outturn Month 2 £'000
0	Family Help and Protection	0	0	272	0	0	272	272
0	Education and Learning	20,937	0	0	4,323	0	25,260	25,260
0	Schools	103	0	0	(40)	0	63	63
0	Commissioning and Communities	140	0	0	0	0	140	140
0	Total Families, Children & Wellbeing	21,180	0	272	4,283	0	25,735	25,735

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

Detail Type	Amount £'000	Project	Description
Education and Learning			
Variation	3,519	High Needs Provision Capital	This increase to the budget reflects the actual grant allocation for 2026/27 which was announced in April 2026 after the Education report to Cabinet in March.
Variation	612	New Pupil Places (Basic Need)	Variation to budget reflects the additional S106 funds in 25/26 which should have been applied as additional budget rather than a funding switch. The scheme still has the grant funds originally budgeted for available.
Variation	192	Education Capital Maintenance	Variation to budget reflects the additional S106 funds in 25/26 which should have been applied as additional budget rather than a funding switch. The scheme still has the grant funds originally budgeted for available.
Schools			
Variation	(40)	Cardinal Newman 4G Pitch & Changing Rooms	Variation of less than £0.100m. Underspend as project is expected to complete in 2026/27.

Appendix 7 – Capital Programme Performance

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

Forecast Variance Month 0 £'000	Unit	Reported Budget Month 0 £'000	Reported at Other Committees £'000	New Schemes £'000	Variations £'000	Slippages & Reprofiles £'000	Reported Budget Month 2 £'000	Forecast Outturn Month 2 £'000
0	Adult Social Care	1,384	0	0	(529)	0	855	855
0	Homes & Investment	3,693	0	0	0	0	3,693	3,693
0	Housing People Services	994	0	0	0	0	994	994
0	Total Homes & Adult Social Care	6,071	0	0	(529)	0	5,542	5,542

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

Detail Type	Amount £'000	Project	Description
Adult Social Care			
Variation	(529)	Knoll House Building Works	The capital costs for the development were calculated in 2021 and due to the impact of Brexit and the Covid-19 pandemic on building costs, contingency of 24% was included. The build costs came in under budget and this combined with more Homes England grant than anticipated and a Brownfield Release fund grant has resulted in a forecasted underspend.

City Operations – Capital Budget Summary

Forecast Variance Month 0 £'000	Unit	Reported Budget Month 0 £'000	Reported at Other Committees £'000	New Schemes £'000	Variations £'000	Slippages & Reprofiles £'000	Reported Budget Month 2 £'000	Forecast Outturn Month 2 £'000
0	City Infrastructure	44,988	0	0	446	0	45,434	45,434
0	Digital Innovation	3,780	0	0	0	0	3,780	3,780
0	Environment and Culture	14,521	0	0	0	(49)	14,472	14,472
0	Environmental Services	10,889	0	0	0	0	10,889	10,889
0	Place	7,939	3,500	0	374	0	11,813	11,813
0	Total City Operations	82,117	3,500	0	820	(49)	86,388	86,388

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

Detail Type	Amount £'000	Project	Description
City Infrastructure			
Variation	386	Integrated Transport Schemes (Local Transport Plan)	Variation to budget reflects the additional S106 funds in 25/26 which should have been applied as additional budget rather than a funding switch. The scheme still has the grant funds originally budgeted for available.
Variation	60	Various schemes	Variations to budget of less than £0.100m. £0.044m Intelligent Transport Systems £0.016m Bus Service Improvement Plan
Environment & Culture			
Reprofile	(49)	Royal Pavilion Estate Development (Phase 2 Gardens)	Reprofile of budget less than £0.100m
Place			
Reported to Other Committees	3,500	King Alfred Leisure Centre Regeneration Project	Reported to Cabinet 23rd April 2026
Variation	152	Madeira Terraces Regeneration - Project Support	The Madeira Terrace project has been awarded a second grant allocation from Historic England to support the project and £0.060m is planned to be spent in 2026/27. In addition, the project will incorporate works to the Laundry Arch and an additional £0.092m has been allocated to the

Appendix 7 – Capital Programme Performance

Detail Type	Amount £'000	Project	Description
			project. This will be funded from borrowing with the financing costs being met from additional revenue income once the overall phase is completed later this financial year.
Variation	150	Elder Place Corridor	Variation to budget reflects S106 funds available to deliver the first phase of the project of £0.150m in year 1, £0.414m in year 2 and £0.182m in year 3 that focusses on Elder Place, from and including York Hill. Future phases remain dependent on the identification and securing of additional external funding.
Variation	72	Various schemes	Variations to budget of less than £0.100m. These increases reflect the actual funds available due to interest added to the original funds: £0.068m Madeira Terraces Crowd Funding Contribution £0.004m Madeira Terraces Bequest Funding

Central Hub - Capital Budget Summary

Forecast Variance Month 0 £'000	Unit	Reported Budget Month 0 £'000	Reported at Other Committees £'000	New Schemes £'000	Variations £'000	Slippages & Reprofiles £'000	Reported Budget Month 2 £'000	Forecast Outturn Month 2 £'000
0	Finance and Property	18,984	0	0	57	0	19,041	19,041
0	Welfare Revs & Busi Support	2,250	0	0	0	0	2,250	2,250
0	People and Innovation	27	0	0	0	0	27	27
0	Total Central Hub	21,261	0	0	57	0	21,318	21,318

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

Detail Type	Amount £'000	Project	Description
Finance & Property			
Variation	57	Hove Town Hall G101 Redesign	Variation to budget of less than £0.100m.

Housing Revenue Account (HRA) – Capital Budget Summary

Forecast Variance Month 0 £'000	Unit	Reported Budget Month 0 £'000	Reported at Other Committees £'000	New Schemes £'000	Variations £'000	Slippages & Reprofiles £'000	Reported Budget Month 2 £'000	Forecast Outturn Month 2 £'000	Forecast Variance Month 2 £'000	Forecast Variance Month 2 %
0	Housing People Services	0	0	0	40	0	40	40	0	0.0%
0	Housing Regeneration	44,530	0	0	51	0	44,581	44,581	0	0.0%
0	Homes & Investment	89,525	6,008	0	1,950	(8,279)	89,204	84,954	(4,250)	-4.8%
0	Total Homes & Adult Social Care - HRA	134,055	6,008	0	2,041	(8,279)	133,825	129,575	(4,250)	-3.2%

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

Detail Type	Amount £'000	Project	Description
Housing People Services			
Variation	40	Fencing	Variation to budget of less than £0.100m
Housing Regeneration			
Variation	51	LPS Project	Variation to budget of less than £0.100m:
Homes & Investment			
Reported at Other Committee	6,008	Fire Safety - Cladding Safety Scheme	Cabinet Report - 29th June 2026: Improving Fire Safety in Council Homes - profiled budget based on anticipated grant
Reprofile	(4,508)	Fire Safety - Cladding Safety Scheme	See above
Reprofile	(3,771)	Structural Repairs	The major capital works projects are subject to review and authorisation of the Building Safety Regulations (BSR). The Building Safety Act requirements continue to impact on delivery timescales to projects as consideration needs to be given to other works, wider than just the capital works, and this is impacting on getting on-site. The service are working on future years programmes to bring forward applications to BSR where possible and other low rise blocks in advance of future programmes.
Variation	2,500	Disrepair Capital Works	Currently, the Disrepairs budget is under increased pressure with this workstream still being extremely demanding in terms of volume and nature of work. The approach taken on site is that all obvious areas of disrepair are addressed at the time of a claim, even if not originally cited on the letter of claim. This helps to mitigate against recurrence of claims and increased revenue

Appendix 7 – Capital Programme Performance

Detail Type	Amount £'000	Project	Description
			costs in respect of fees for costs and damages. The revised budget reflects profiling spend to date across the year and is a more accurate forecast of resources required to address this challenge.
Variation	500	Roofing	An increased spend is expected following a review of the current programme and some additional urgent roof replacement works, which were not part of the original programme.
Variation	50	Minor Capital Works	Variation to budget of less than £0.100m
Variation	(1,000)	Lifts Refurbishment	There have been difficulties with the contractor that has resulted in revised timescales in agreeing capital works for lift replacements. All sites continue to offer a reliable service and appropriate repairs carried out where needed.
Variation	(100)	Communal Boilers	Variation to budget of less than £0.100m
Variance	(3,850)	Structural Repairs	The major capital works projects are subject to review and authorisation of the Building Safety Regulations (BSR). The Building Safety Act requirements continue to impact on delivery timescales to projects as consideration needs to be given to other works, wider than just the capital works, and this is impacting on getting on-site. The service are working on future years programmes to bring forward applications to BSR where possible and other low rise blocks in advance of future programmes.
Variance	(400)	Home Energy Efficiency & Renewables	Based on contractor capacity and project delivery timelines, which will need to incorporate resident engagement, there is a forecast underspend against budget.

Brighton & Hove City Council

Cabinet

Agenda Item 33

Subject: Asset Strategy

Date of meeting: Thursday, 16 July 2026

Report of: Cabinet Member for Finance and City Regeneration

Lead Officer: Name: Chief Finance Officer

Contact Officer: Name: Jessica Hamilton, Julian Salmon

Email: Jessica.hamilton@brighton-hove.gov.uk
Julian.salmon@brighton-hove.gov.uk

Ward(s) affected: (All Wards);

Key Decision: Yes

Reason(s) Key: Expenditure which is, or the making of savings which are, significant having regard to the expenditure of the City Council's budget, namely above £1,000,000.

For general release

1. Purpose of the report and policy context

- 1.1 This report identifies assets for disposal to support delivery of the actions and objectives of the council's Asset Management Plan, specifically to seek value for money and best use of our assets to achieve income and capital receipts and reduce expenditure to support the Medium Term Financial Strategy (MTFS).
- 1.2 The proposed strategy supports the Council Plan 2023 – 2027 (refresh 2025), specifically:
 - **Outcome 2:** A fair and inclusive city is supported through increasing housing supply.
 - **Outcome 4:** A responsive council with well-run services is supported by providing critical investment for the Innovation Fund which uses the government's capital receipt flexibilities to invest in improvements to service delivery, achieve savings and efficiencies, improve the council's digital services and enable best use of the council's assets to deliver capital investment and financial sustainability.

2. Recommendations

- 2.1 Cabinet agrees to the disposal of the assets identified at paragraphs 3.3-3.20 of this report and the Part 2 report in the manner set out in the reports.
- 2.2 Cabinet delegates authority to the Director Property & Finance in consultation with the Cabinet Member for Finance and City Regeneration to

approve terms and take any necessary steps to facilitate and complete the disposals of the properties identified and achieve best consideration.

- 2.3 Cabinet notes the work ongoing to ensure there is sufficient space available for creative and cultural industry in the city.

3. Context and background information

- 3.1 The council's Asset Management Plan (AMP) was approved at Cabinet in October 2025 and sets out five objectives for the strategic management of the council's land and buildings, which are to:
1. Identify sites and capital receipts for delivery or purchase of Affordable Housing and Temporary Accommodation.
 2. Ensure council operational assets and buildings are safe, well maintained and are used effectively and efficiently to meet service need.
 3. Deliver environmentally sustainable solutions as part of our property maintenance programme.
 4. Provide accommodation to support the city economy and local businesses and city regeneration and preserve the city's culture & heritage.
 5. Seek value for money and best use of our assets to achieve income and capital receipts and reduce expenditure to support the MTFS.
- 3.2 The AMP supports the outcomes of the Council Plan and directly supports delivery of the council's Medium Term Financial Strategy, which identifies a requirement to achieve **c.£55m** capital receipts from the disposal of assets to support transformation programmes and capital spend, as well as a reduction in operational property costs of over **£2m**.

Operational Portfolio

- 3.3 A report from Finance Children & Wellbeing recommending the closure of **Hove Park School - Valley Campus** and the amalgamation of the school onto one campus will be presented to this Cabinet alongside an outline of actions being taken to develop a disposal strategy based on a masterplan for the site, which has been commissioned, and an opinion of value, which will follow. The site is recommended for disposal at best consideration subject to obtaining Secretary of State consent under s77 SSFA 1998 and Part 1 of Schedule 1 of the Academies Act 2010 and consideration of any conditions imposed.

Commercial Portfolio

- 3.4 **1 – 3 Bond Street Row** is a tertiary retail property in the North Laine. The lease has 6 years remaining with a current passing annual rent of **£9,500** which is subject to a rent review in 2027. The property is leased in conjunction with 7 Bond Street and forms part of a larger council owned block including 7, 8, 9, 10, 11, 12, 13 Bond Street and 1, 2, 3, 3a and 4 Bond Street Cottages, which have already been approved for disposal by Cabinet. It is recommended that the property is sold to the tenant, or on the open

market at best consideration to avoid holding an outlying asset. An opinion of value has not yet been provided.

- 3.5 In November 2024, an independent fire engineer concluded that **New England House** (NEH) presented an intolerable fire risk in its existing condition. Short-term control measures were put in place while long-term plans were assessed. On 20 March 2025, Cabinet agreed to secure vacant possession by 30 September 2025 [Agenda Item 173]. Most tenants vacated by this date, although a small number required extended periods to relocate. Full vacant possession was achieved in June 2026. An internal audit into decision-making leading to temporary closure was reported to Audit & Standards Committee in June 2025 [Agenda Item 11].
- 3.6 NEH housed over 100 tenants and more than 700 workers, the majority within the creative, cultural, and digital sectors. The closure resulted in the loss of **16,067m² GIA [13,366 m² NIA]** of light industrial workspace in a central city location. Whilst emptying the building the council waived rent, reduced service charges and contributed towards tenants' moving costs to support their move to new premises. Attempts were also made to convert vacant school buildings to temporarily relocate tenants. However this did not proceed due limited interest from tenants and a high risk that the schools could not be converted within timescales whilst mitigating Health & Safety and compliance risks. A shortage of comparable affordable workspace has led to the displacement of businesses, with some leaving the city, reducing operations, or ceasing trade.
- 3.7 The council's strategic aim is to ensure there is an economically sustainable provision of commercial workspace, including light industrial space at the NEH site supporting a diverse range of businesses which continues to foster the city's creative, cultural and digital business sectors and offers space for makers to start up and grow.
- 3.8 We have therefore carried out further appraisal of options for the building, focusing on directly delivering a deep retrofit of the existing building or redevelopment of the site.

Option: Deep Retrofit

This option proposes a retrofit, retaining the structural frame and replacing most other elements of the building. The work would improve accessibility, environmental performance and regulatory compliance. New workspace would be created at roof level and a new café on Level 3. Entrances at Elder Place and New England Street would be improved as well as circulation throughout the building.

Delivers:	18,690m ² GIA / 14,933m ² NIA
Estimated cost:	£67m
Payback:	18–33 years
Peak budget pressure before generating income:	£15.8m
Handover:	Autumn 2029

Pros: Lower embodied carbon and retains materials which are reused, preserves building character.

Cons: Financial viability challenges; substantial void risk; high upfront capital requirement; major speculative development with significant letting risk (24-month void assumed).

Option: Demolition and New Build

This option proposes a full demolition and delivery of a modern, high-efficiency commercial building with mixed workspace types.

Delivers:	21,832m ² GIA / 18,533m ² NIA
Estimated cost:	£97m
Payback:	25–50 years
Peak budget pressure before generating income:	£18.2m
Handover:	Winter 2029

Pros: Highest floorspace efficiency; modern specification throughout; purpose-designed for target sectors.

Cons: Highest cost; loss of entire existing structure; major speculative development with significant letting risk (24-month void assumed).

- 3.9 Both options would require substantial capital investment, estimated at between **£67m and £97m**. With rents set at competitive market rates, these options have long payback periods and a peak budget pressure of between **£15.8m and £18.2m** before beginning to earn an income, with the highest in-year pressure of between **£4.7m and £4.9m**.
- 3.10 Such budget pressures in the context of the council's current financial constraints make these options unviable and undeliverable. There are also significant delivery and commercial risks. Existing tenants have now relocated and therefore either a retrofit or redevelopment option would represent the largest speculative commercial development in the city for many years. This would expose the council to substantial construction, leasing, market and borrowing risks at a time when there is limited financial capacity to absorb further pressure.
- 3.11 The Council recognises the importance of the creative, cultural and digital sectors to the city. The B&H Culture Alliance's recent "Space to Grow" research highlights gaps in creative workspace provision and the closure of NEH further widens these gaps. An alternative route must be taken to deliver the strategic aim and provide economically sustainable commercial workspace for our target creative, cultural and digital business sectors. We will do this by pursuing wider regeneration opportunities in the New England area and using the council's property estate to deliver space, and co-location benefits, lost to these sectors.
- 3.12 We will continue to support the provision of creative workspace by unlocking the potential of vacant council commercial assets, partnering with the creative community to curate engaging spaces that promote local talent,

culture, and social connection. The overarching purpose will be to transform vacant spaces within the current commercial portfolio into vibrant hubs of creativity, to enable local arts/creative organisations to thrive. We will breathe new life into underused buildings, allowing both creatives and entrepreneurs to turn vacant assets into engines for economic growth and artistic innovation, benefitting both the local creative industry and the Council.

- 3.13 The Asset Management Plan requires the council to seek value for money and best use of our assets to achieve income and capital receipts. Several buildings have been identified which currently have vacant space and are ideally placed to support this approach as well as continue the council's facilitation role in helping creative organisations find space in the city. We have identified over 30,000 sq ft of vacant workspace at Phoenix House, West Street and Lyndean House, Queens Road in Brighton, which we aim to start marketing to the target sectors from mid-August 2026.
- 3.14 New England Quarter and London Road Area is recognised as a Development Area in City Plan Part One and we have looked, with partners, at development opportunities and ways to ensure coordinated regeneration of the wider area. There are several potential regeneration opportunities that could be coordinated to bring forward a significant mixed-use place shaping initiative across the wider area. We will prepare a development brief for NEH, considering other sites in the wider area, and seek external partners to deliver a policy compliant mix of workspace and housing. This route also provides the opportunity to secure a capital receipt, reduce borrowing pressures and support the council's wider financial sustainability.
- 3.15 It is recommended the site be marketed for disposal with a development brief establishing clear parameters aligned with planning policy and guiding future proposals towards good placemaking. Under City Plan Part One DA4.C.2. the planning authority will expect no loss of employment floor space and so a similar amount of employment floorspace must be re-provided either on or offsite. Where housing is proposed, a policy compliant provision of affordable housing would be expected.
- 3.16 The scale, type, and configuration of a future development will be subject to viability and detailed planning discussions, rather than fixed requirements in the development brief. This approach would balance the need to support economic activity with the realities of development viability and the objective of securing best consideration from disposal.
- 3.17 The closure of NEH has resulted in the loss of 16,000m² of centrally located light industrial employment space and has intensified existing pressures for such space in the city. This is particularly significant given the importance of the creative, cultural and digital sectors, which account for 21% of all businesses in the city (PRD, 2024), and have experienced strong recent growth in employment numbers, underpinning the city's economic identity and competitiveness. The recommended approach seeks to respond to that loss in a practical and financially responsible way. It recognises that direct council-led retrofit or redevelopment is not affordable, while committing to

alternative routes, including using disposal to secure future regeneration, attract external investment, support new employment floorspace and promote alternative creative workspace opportunities across the city.

Agricultural Portfolio

- 3.18 The **Land at Falmer** is a triangle of land to the south of Park Street and is leased with a triangle of land to the north of Park Street on which is located a Farm shop and car parking. The annual rent is **£7,500** for both plots and the lease expires in June 2027. The southern triangle has been identified as a site for disposal on the open market. The northern triangle would be relet to the existing tenant and continue as a farm shop and car park.
- 3.19 The **Land at Saltdean** comprises 4.5 acres of land leased on a Farm Business Tenancy (FBT) expiring in September 2026 with an annual rent of **£750**. The site is used for grazing horses and is land locked with the access track across land owned by the current tenant. It is recommended the site be sold to the current tenant. There is interest from local residents to utilise a small part of the site for community food growing. However vacant possession of part and access rights to the land would need to be negotiated with the current tenant to fulfill this.
- 3.20 The **Land South of Poynings** extends to approximately 25 acres and is an isolated site located beyond the city boundary let on an FBT at an annual rent of **£3,100**. It is located within the South Downs National Park, adjacent to a Site of Special Scientific Interest and a public right of way. Its position within the National Park significantly constrains the ability of securing planning permission for development as planning policies place strict limitations on new development making a future change of use challenging. It is recommended that the site is offered to the National Trust, who are an adjacent landowner, or the existing tenant or alternatively on the open market.

4. Analysis and consideration of alternative options

- 4.1 The retention of surplus and vacant schools will incur ongoing occupational costs including NNDR (business rates), utilities, cleaning, Health & Safety testing and inspections, security, repair and maintenance. The cost of these is an ongoing pressure on the council's Corporate Landlord budgets. Through disposal, Corporate Landlord expenditure is therefore reduced and, where budgets are currently sufficient, revenue savings can be made.
- 4.2 Alternative options to refurbish or redevelop New England House have been considered, however the capital investment required for what would be a speculative development is considered too high a risk for the council to deliver, given its current financial position. The unnecessary retention of this site, which is suitable for development, presents a missed opportunity to consider wider regeneration opportunities, reprovide employment space, and potentially provide additional housing for the city.
- 4.3 The retention of the smaller isolated plots of land within the agricultural portfolio can support the objectives of the City Downland Estate Plan

depending on their use, but given their size and location are unable to contribute significantly to the delivery of the plan. Their retention, whilst providing an income stream, is low in relation to market value and undermined by agency and legal costs incurred in managing the tenancies.

- 4.4 In all circumstances, by retaining properties the council will forgo a capital receipt which if invested as part of the council's corporate transformation programme would yield savings in the council's service delivery and/or improvement of service delivery. Without sufficient capital receipts, the council will not be able to develop and deliver the required savings, which would undermine the council's ambition to achieve financial stability.

5. Community engagement and consultation

- 5.1 The council has sought advice from its managing agents, SHW and Knight Frank as well as property consultants in relation to constructions costs and valuation.

6. Financial implications

- 6.1 The council's Capital Strategy, agreed at Budget Council on 26 February 2026, highlighted the need for capital receipts to support the council's current Transformation Programmes and Strategic Investment Funds and are integral to the council's financial resilience within the Medium Term Financial Plan. The report identified the need for c.£55 million net receipts. The demand for capital receipts will grow further as the council identifies new investment requirements.
- 6.2 The recommendations set out in this report and proposed disposals within the accompanying Part 2 report will contribute towards the capital receipts requirement. Where a disposal results in a loss of rent the rent loss will be reflected in the medium term financial plan (MTFP) increasing budget gaps and savings requirements.

Name of finance officer consulted: James Hengeveld
Date consulted: 19/06/2026

7. Legal implications

- 7.1 The council has the power to dispose of the land identified for disposal in this report under section 123 of the Local Government Act 1972 ("LGA 72") subject to obtaining the best consideration reasonably obtainable. Where land is open space, section 123 (2A) LGA 72 also has a requirement to advertise the proposed disposal in a local newspaper for two consecutive weeks and to consider any objections raised before taking a decision on whether to dispose of the land. Section 122 of the LGA 72 contains a similar requirement in relation to the change of the use of any open space. In exercising the delegations set out in this report, the Director Property & Finance in consultation with the Cabinet Member for Finance and City Regeneration will need to be satisfied that these requirements are met.

- 7.2 Prior to any sale of school land the council must comply with section 77 of the School Standards and Framework Act 1998 (SSFA 1998). This specifically applies to the change of use of school playing fields that have been used by a maintained school within the last 10 years. The Department for Education (DfE) generally has a strong presumption against such disposals or change of use, requiring robust justification in order to secure consent. The council will also need to comply with Part 1 of Schedule 1 of the Academies Act 2010. This extends the requirement for Secretary of State consent to appropriate any school land (not limited to playing fields) held by a local authority that has been used wholly or mainly by a school (including academies) within the preceding 8 years. There is a risk that consent for land disposal the Secretary of State may exercise its discretion to direct how any proceeds from the sale of the school land are used, which may include requiring them to be paid directly to the Secretary of State. This process and conditions will need to be factored into the timetable for any open market disposal.
- 7.3 It will also be necessary for Legal Services to review the titles to the properties which are the subject of this report to confirm that no interests exist that may prevent a transfer. If any restrictions or covenants exist, the reviews will ascertain whether or not they are still capable of being disposed of.

Name of lawyer consulted: Hannah Bassett Date consulted: 19/06/26

8. Risk implications

- 8.1 There are risks identified in retaining the properties identified for disposal. This would include the ongoing costs and liability of retaining the properties, both occupational costs but also investment needed; the opportunity forgone to create additional housing and regenerative developments; and the capital receipt forgone and the impact this would have on funding for Capital budgets.
- 8.2 There are risks and mitigations identified as part of the Asset Strategy Programme. These include several risks that would result in a delay to achieving capital receipts and there are mitigations in place to address these.
- 8.3 There is a risk that the opinions of value expressed in this report and informing the decision making are, at this early stage, based on assumptions which may change over time and therefore the value of assets identified may alter as the factors affecting the valuations become more certain.

9. Equalities implications

- 9.1 The Public Sector Equality Duty (PSED) under section 149 of the Equality Act 2010 requires the council, when exercising its functions, to have 'due regard' to: i. The need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010; ii.

The need to advance equality of opportunity between persons who share protected characteristics and those who do not, and; iii. Foster good relations between those who have protected characteristics and those who do not. Note: 'Protected characteristics' are age, sex, race, disability, sexual orientation, marriage and civil partnerships, religion or belief, pregnancy and maternity and gender reassignment. An EqHIA (Equality and Health Impact Assessment) is usually carried out when a current or planned service/ policy/ activity is likely to affect staff, service users, or other residents. When seeking to dispose of the properties identified by this report and where required by the Equality Act 2010, the relevant equality implications will be considered as part of the decision making process in the exercise of the delegated authority identified at recommendation 2.2.

10. Sustainability implications

- 10.1 For those properties to be disposed of it is anticipated that following disposal the purchaser would likely make improvement to the properties which would include elements to improve energy efficiency. Any redevelopment would be completed in compliance with current standards and requirements.

11. Health and Wellbeing Implications

- 11.1 The disposal of the properties will allow them to be refurbished or redeveloped and occupied as housing or commercial space supporting employment, therefore contributing in a small way to the wider factors influencing health and well-being.

12 Conclusion

- 12.1 The council's property portfolios undergo continual review to improve performance and identify opportunities as set out in the council's Asset Management Plan. This includes the achievement of capital receipts through disposals to support the council's Medium Term Financial Strategy.

Brighton & Hove City Council

Cabinet

Agenda Item 34

Subject: Covenant on Plot 2 and 3 in West Saltdean

Date of meeting: Thursday 16 July 2026

Report of: Cabinet Member for Finance & City Regeneration

Contact Officer: Name: Jasmine Dean-Milward, Michael Harris

Email: jasmine.dean-milward@brighton-hove.gov.uk
mike.harris@brighton-hove.gov.uk

Ward(s) affected: Rottingdean & West Saltdean

For general release

Key Decision: No

1. Purpose of the report and policy context

- 1.1 This report seeks a decision from Cabinet not to exercise its ability to take over two separate parcels of privately-owned Land, known as "Plot 2" and "Plot 3" of the Mount Estate in Saltdean ("the Land"), for use as public open space. This right is set out in Clause 4 of an Agreement dated 25 July 1938 between (1) Saltdean Estate Company Ltd and (2) the Mayor, Aldermen and Burgesses of the Borough of Brighton ("the 1938 Agreement").
- 1.2 Regard has been given to the Council Plan 2023-2027, which emphasises the need to make best use of council resources and assets, to ensure financial sustainability.
- 1.3 This report provides further information to Cabinet pursuant to a Notice of Motion passed in Full Council on 13 October 2025 to "request that officers prepare a report to be presented to Cabinet about the processes, timescale and costs of invoking Clause 4 of the Covenant [1938 Agreement] for plots 2 and 3 of The Mount Estate".

2. Recommendations

- 2.1 Cabinet agrees not to seek to take over/acquire the Land for the purposes of public open space at this time.
- 2.2 Cabinet is asked to note the contents of Part 2 of this report.

3. Context and background information

- 3.1 The Land which is the subject of this report comprises two privately-owned plots of land located in West Saltdean, a site plan has been provided in Appendix 1. Each plot has a different status, as set out below.
- 3.2 There are no Public Rights of Way on the sites. Should the public wish to request any existing informal footpaths be adopted as public rights of way, residents would need to make an application for a Definitive Map Modification Order (under the Wildlife & Countryside Act 1981) to have the footpath(s) added to the Definitive Map of Public Rights of Way for Brighton

& Hove. Any application would need to include a map or plan of the claimed route and be supported by evidence demonstrating that the route has been in continuous use for 20 years or more and/or historical evidence. It is the applicant's responsibility to serve notice on every landowner / occupier making them aware of the application. The relevant forms can be requested from the council via the city parks email: CityParks@brighton-hove.gov.uk

Plot 2

- 3.3 This was previously listed as an Asset of Community Value ("ACV"). Following the expiry of the appropriate moratorium period to enable community bids to purchase the land this property was removed from the ACV register in February 2024.
- 3.4 Following removal from the Council's ACV register, a further application was made on 21 August 2024 to register Plot 2 as an ACV but that application was unsuccessful. In its decision not to list the property as an ACV dated 23 October 2024, the Council determined that the site was deemed to be "overgrown and inaccessible" and that the Council as Registration Authority could not realistically foresee any future community use promoting social wellbeing or interests of the local community". The freehold interest was then sold to the current owner, a private company, on 26 March 2025.
- 3.5 The current owner of Plot 2 has confirmed that they first submitted a pre-application to the Council's planning department and have now progressed to an outlined planning application. Their proposal sets out a mixed-use scheme that combines low-impact eco homes with accessible local green space and allotments.
- 3.6 Prior to this property being purchased by the current owner, local residents had access to it; however, whilst there is some evidence of historic use by residents, the nature and extent of that use is unknown. The owner has indicated they would be willing to discuss a potential disposal of Plot 2 either to the Council or to local residents at market value which we estimate to be £65,000 plus the costs they have incurred to date including the planning applications which is estimated to be £10,000. Local residents are aware of the landowner's intention to develop part of the site for housing but are keen for the site to be used as amenity space for the benefit of the community.

Plot 3

- 3.7 This is currently owned by a private owner. The site has been listed as an ACV since 29 November 2021. The owner has confirmed its intention to submit a planning application for a residential development of not more than 3 houses to be constructed at the southern entrance to the site. At the date of this report a full planning application has not yet been submitted for this proposed development.
- 3.8 Site 2 and 3 are designated as Open Space in Brighton & Hove's City Plan and are also identified as Local Green Space within the West Saltdean Neighbourhood Plan. There is a statutory process by which an application to register land as a Village Green. Details can be found on the Government website ([Town and village greens: how to register - GOV.UK](https://www.gov.uk/guidance/town-and-village-greens-how-to-register)).

Covenant

- 3.9 Both plots are subject to a covenant set out in Clause 4 of the 1938 Agreement which allows the Council to serve notice on the Owner to take over (which is taken to mean “acquire”) the Land as “public open spaces”.
- 3.10 In accordance with the Notice of Motion agreed, the implications of invoking the covenant in respect of the Land have been explored. If the Council was to proceed to acquire Plot 2 and/or Plot 3, in addition to the costs associated with the acquisition of the Land (details of which are set out in Part 2 of this report), the Council would become responsible for managing and maintaining the site/s. At present the potential costs of owning and maintaining the land as open space are unknown but would include:
- (1) Immediate costs to survey the site(s) to identify any issues
This would include a tree survey, soil check and a Health and Safety Risk Assessment. The cost of this is unknown but estimated to be circa £5,000.
- (2) Rectification of any issues identified
This could include tree safety works, removal or cutting back of vegetation; removal of fly tipping; removing or regularising incidences of adverse possession/trespass claims (there is evidence on Google Maps this may have taken place) and removal of any invasive species if present (e.g. Japanese Knotweed). The cost of this is unknown until surveys can be carried out but assuming minimal issues this is estimated to be £25,000.
- (3) Investment to improve public amenities and standard of provision
This would be dependent upon the scope for the open space. A natural green space would be most cost effective with minimal work needed. If formal paths, planting schemes and infrastructure were needed this would require further capital expenditure. As no direction has yet been provided the cost is unknown. However, if kept as is, there would be no additional cost.
- (4) Ongoing maintenance of the site(s)
This would include ongoing tree surveys and maintenance, grass cutting, maintenance to vegetation, potentially maintenance of boundary walls and fences and supporting community engagement. Parks and Leisure are unable to accommodate maintenance of these site(s) within their existing resources and therefore their acquisition would require the employment of an additional member of staff, the acquisition of an additional vehicle and the purchase of additional equipment. This would mean a capital cost initially as well as ongoing annual costs for staffing, plus vehicle and machinery repairs and replacements in further years.
- 3.11 The maintenance costs cannot be accurately quantified at this stage; however, they are anticipated to be significant and would place additional pressure on the Council’s already constrained revenue budgets. Therefore this is not considered a viable option for the Council.
- 3.12 The residents have proposed a maintenance and management model, particularly for Plot 2. While the community has offered to maintain the plots,

the Council would need to invoke the covenant to enable this arrangement. Should the community group cease to operate, responsibility for maintenance would revert to the Council.

4. Analysis and consideration of alternative options

4.1 The alternative options outlined below would apply to each of Plots 2 and 3:

4.2 Option 1: Council negotiates the removal of the 1938 Agreement open space provisions from each of the Land Registry titles for the Land

The Council could negotiate with each of the current owners of the Land to release the 1938 Agreement open space provisions in return for the payment of a premium to the Council. The amount of premium payable for this release would be subject to negotiation and would typically reflect the uplift in value arising from the removal of the provisions.

4.3 Option 2: Council exercises the 1938 Agreement clause 4 provisions and acquires the Land for the purpose of Public Open Space

This would require the Council to purchase the Land for open space purposes by negotiation and agreement with each of the current owners. There would be the legal and acquisition costs together with survey, rectification and ongoing costs associated to this option.

4.4 Option 3: Council Purchases the Land for housing

Acquisition of the land by the Council for the purposes of housing would need to be by negotiation with the current owners. The owner of Plot 2 has indicated a willingness to dispose of the land to the Council at market value plus the costs they have incurred to date (costs of which have been estimated in paragraph 3.5 above). However, there is risk in achieving planning consent and viability of a development has not been tested. The Council is not aware that the owner of Plot 3 would be willing to dispose of their land.

4.5 Option 4: Residents Purchase the Land Directly

The residents could approach and negotiate and agree the purchase price of Plot 2 and Plot 3 respectively directly with each of the current owners. The current owner of Plot 2 has already advised that they would be open to such an approach. It is unclear whether the current owner of Plot 3 would be open to such an approach.

4.6 Option 5: Council takes enforcement action against the current owners in respect of the covenant in clause 2 of the 1938 Agreement

Clause 2 of the 1938 Agreement contains a positive covenant by the original party to that Agreement to: *'...cause the open spaces delineated and coloured pink on the said plan to be kept in good order and condition the turf thereon duly mown and when necessary reseeded weeded and generally kept in good order and clear of all debris and rubbish.'* The drafting of the 1938 Agreement is such that further legal consideration would be needed to assess how and if the Council could proceed with enforcement action for any breach of this covenant.

5. Community engagement and consultation

- 5.1 The current owner of Plot 2 held a meeting with the community on 26 April 2025 to answer any questions or concerns the residents had regarding developing the land. At the meeting residents expressed their opposition to the landowner's development proposals.
- 5.2 Ward Councillors have been briefed and consulted on the recommendations of this report.

6. Financial implications

- 6.1 There are no direct financial implications for the Council arising from the recommendation as set out in paragraph 2 of this report.
- 6.2 The option set out in paragraph 4.2 ("Option 1") of this report is likely to result in additional capital receipt for the Council. Until terms are formally agreed for removal of the restrictive covenant from Plots 2 and 3, the financial implications of this option are not yet known.
- 6.3 The full financial implications of the options set out in paragraph 4.3 ("Option 2") and in paragraph 4.4 ("Option 3") of this report are not yet known. However, such costs are likely to be significant given that they will include legal fees, acquisition costs and will carry the risk of rectification works and ongoing maintenance/management costs (highlighted in 3.8 and 3.9).
- 6.4 There are no direct financial implications arising from the option set out in paragraph 4.5 ("Option 4") of this report.
- 6.5 There are likely to be significant legal and surveyor costs associated with the option set out in paragraph 4.6 ("Option 5") of this report.
- 6.6 Currently, no budgetary allowance has been made for the cost of acquisition or additional ongoing revenue costs of activities to support the options outlined in this report.

Name of finance officer consulted: James Hengeveld
Date consulted: 14/05/2026

7. Legal implications

- 7.1 There are no direct legal implications arising from the recommendations set out in this report.
- 7.2 If the Council were to seek to acquire the Land, Section 120 of the Local Government Act 1972 gives power to Local Authorities to acquire land for the purpose of their statutory functions or for the benefit, improvement or development of their (administrative) area, which could include the negotiation and agreement with the owners of Plot 2 and of Plot 3 of terms for the for acquisition of the freehold Land.
- 7.3 Local authorities also have the power under section 9 of the Open Spaces Act 1906 to acquire any open space, such as plots 2 and 3 and to undertake the care, management and control of any such open space.

- 7.4 The definition of Open space under section 336(1) of the Town and Country Planning Act 1990 includes any land laid out as a public garden or used for the purposes of public recreation. This definition is used across various statutory provisions governing the disposal and use of open space by public authorities.
- 7.5 In addition, Section 26 of the Town and Country Planning Act 1932 (1932 Act) provides that a local authority may acquire land for the purpose of open space where a relevant scheme has been made under the provisions of that Act and approved by the Minister of State. The 1938 Agreement refers to the 1932 Act and not section 26 itself, however given that the 1932 Act has been repealed, it is unclear whether this compulsory purchase power remains available to the Council and expert legal opinion should be sought before deciding whether to proceed with such an approach. Again, it should be noted that the 1938 Agreement is silent as to which specific provision of the TCPA 1932 is to apply to that Agreement.
- 7.6 The legal position is complex and full advice in relation to the 1938 Agreement is contained in the Part 2 report.

Name of lawyer consulted: Hannah Bassett
Date consulted: 21 May 2026

8. Risk implications

Loss of public open space

- 8.1 By not exercising its rights under Clause 4 of the 1938 Agreement, the Council will forgo the opportunity to guarantee that the Land is brought into public ownership and secured for use as public open space. Once alternative uses are established, this opportunity is unlikely to arise again.

Future development of the sites

- 8.2 The Land is in private ownership and may be subject to future planning applications. While such applications would be determined in accordance with the development plan, there is a risk that development could be permitted which changes the character of the sites and limits potential future community access.

Reduced influence over future land use

- 8.3 Without ownership or control of the Land, the Council's ability to directly influence how the sites are used and managed will be limited to its role as local planning authority. This reduces the Council's ability to secure specific outcomes relating to open space provision, accessibility, or community use.

Equality and wellbeing impacts

- 8.4 As set out in Section 9, not securing the Land as public open space may limit the potential health, wellbeing and social benefits typically associated with accessible green space.

9. Equalities implications

- 9.1 The provision of open green space can have positive equality impacts. Access to green space is associated with physical and mental health benefits and can support social interaction and community wellbeing. As such, the decision not to enact the covenant to secure the land as green space may limit these benefits. However, given the uncertainty around the extent to which the space was previously used by residents, the equality impact is considered limited.
- 9.2 The provision and location of green spaces, together with the investment required to support them, requires careful consideration to avoid creating inequalities in access. Access to green space is often unevenly distributed and can be influenced by socio-economic factors, with some communities benefiting more than others. Ensuring equitable distribution of investment is therefore important so that all demographic groups can benefit.

10. Sustainability implications

- 10.1 Green spaces provide critical habitats for urban wildlife, helping to maintain ecological balance within densely populated environments. These spaces also assist drainage by providing natural drainage systems (SUDS) to manage flood risk and stabilise the soil substrata.
- 10.2 If the land were to be acquired by the Council for the purposes of public open space this would support physical activity and social interaction, improving mental and physical wellbeing. Green landscaping enhances air quality and reduces noise for the local residents. The Sustainability Implications Checklist is attached at Appendix 2.
- 10.3 Where the Council's decision is not to enact the covenant, the future status of the Land will be determined by future planning applications

11. Social Value

- 11.1 Public open space can deliver social value by supporting physical activity, mental wellbeing, and social interaction. While these benefits are recognised, the Council's decision not to enact the covenant means it will not be securing or managing the land as public open space, and therefore these benefits will not be delivered through this site as a result of the decision.

12. Conclusion

- 12.1 As highlighted in this report, the only mechanism by which the Council may guarantee the enactment of the covenant contained in Clause 4 of the 1938 Agreement to make Plot 2 and Plot 3 public open space would be for

the council to acquire the Land through agreement with the current landowners.

- 12.2 In the absence of agreement, the Council could choose to assess further the legal position around the acquisition of the Land through the use of compulsory purchase powers. If the Council decides to pursue this approach, such a process is likely to incur considerable time and expense on the Council's part and there is no guarantee that such a scheme would ultimately result in a successful application for the relevant Minister's approval.
- 12.3 There may be a possibility that the Council could take external legal advice about how any enforcement action against the current owner of Plot 2 and Plot 3 respectively for the breach of the covenant to keep the Land clean and tidy (Clause 2 in the 1938 Agreement). Such an approach is also likely to incur considerable expense and time in the Council obtaining expert advice and then carrying out pre action and then enforcement proceedings. There is no guarantee as to whether such an enforcement action would ultimately prove to be successful.
- 12.4 Given the Council's current financial constraints, and the uncertainty surrounding acquisition costs, long-term upkeep of the Land, as well as the uncertainty as to the extent of public benefit of the Council acquiring the Land, it is not considered proportionate or appropriate to pursue acquisition of the Land or to enforce the covenant in the 1938 Agreement.

Supporting Documentation

Appendices

1. Appendix 1 - Site Plan
2. Appendix 2 – Sustainability Implications Checklist



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Saltdean Green Spaces

Scale: 1:1,500 @A4

Brighton & Hove Sustainability Implications checklist for report writers

This guidance is to support project managers when assessing their projects for sustainability and climate impact and to ensure projects are supporting the wider goals of the city's Carbon Neutral 2030 commitment.

Proposal/advice title: Covenant on Plots 2 & 3 in West Saltdean	Directorate: Property & Finance	Date: 07/07/26
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Sustainability theme	Consideration	Relevant Yes/No?	If 'Yes', is impact positive or negative?	Briefly describe	If negative, briefly describe mitigation measures
Energy	✓ Use renewable sources of energy (renewables that are alternatives to combustion), including clean energy providers ✓ Consider potential for generating renewable energy ✓ Minimise energy consumption	No			
Sustainable travel and transport	✓ Travel is kept to a minimum but where necessary active and sustainable travel is prioritised for people and deliveries/freight, meaning walking and cycling, public transport, car sharing, electric or low emission vehicles including e-cargo bikes and sustainable logistics solutions	No			

Brighton & Hove Sustainability Implications checklist for report writers

	✓ Consider use of shared mobility scheme options, like BTN BikeShare, car clubs, vehicle leasing ✓ Consider practices that eliminate or minimise the need to travel, like homeworking and local co-working hubs, remote access to services, like education, health ✓ Any new Controlled Parking Zone should consider the provision for electric vehicle charging infrastructure				
Sustainable procurement	The council requires its suppliers to conduct their operations in a sustainable manner, in line with our own priorities and commitments. These can be found in our Environmentally Sustainable Procurement Policy. To ensure that our suppliers share our commitment to reducing the impact of the products and services they provide you can: ✓ read the council's Environmentally Sustainable Procurement Policy ✓ have a look at the council's Social Value Framework on p13 to 15 which lists Environmental Sustainability examples in the last column ✓ detail any sustainability requirements you want the winning bidder to follow and/ or deliver as part of the contract in your specification ✓ include a sustainability quality question in your tender	No			

Brighton & Hove Sustainability Implications checklist for report writers

	✓ consider adding a Key Performance Indicator (KPI) that is linked to reducing environmental impact ✓ if you're buying food for the council or procuring a catering contract, read the council's Buying Standards for Catering Contracts; and include these requirements in your specification For further help and advice, please contact the Sustainability and Social Value procurement manager				
Circular waste management practices and procurement	✓ Consumption and use of virgin materials is eliminated or kept to an absolute minimum ✓ Consider leasing of equipment, materials, resources and property rather than purchasing or building new ✓ Use of 100% reused / repurposed materials ✓ Packaging and wasted materials are eliminated, kept to a minimum and made from renewable materials ✓ Ensure food waste is minimised or re-distributed to benefit local communities	No			
Sustainable economy	✓ Support local economy and local employment ✓ Consider impact to local businesses and high streets ✓ Consider opportunities for quality green skills development and training	No			

Brighton & Hove Sustainability Implications checklist for report writers

	✓ Consider circular principles that are outlined in the BHCC Circular Economy Route Map				
Health, safety, wellbeing and local communities	✓ Promote healthy, safe and secure environments in which to live and work ✓ Consider impact of noise, stress and air quality to local residents, building occupants and communities	Yes		Public open space supports physical activity and social interaction, improving mental and physical wellbeing. Green landscaping enhances air quality and reduces noise for the local residents.	
Sustainable water	✓ Minimise water consumption and ensure water efficiency measures are in place ✓ Consider water harvesting and reuse ✓ Consider impact to water pollution from chemicals use, particularly in relation to vehicle use, cleaning and maintenance ✓ Consider use of sustainable urban drainage for minimising impact of water pollution and surface water flooding, in particular, permeable surfaces ✓ Use drought tolerant, native planting schemes to minimise irrigation requirements	No			
Biodiversity and nature conservation	✓ Seek to protect, enhance and create natural habitats to support local species and wildlife ✓ Ensure pesticides and herbicides are not used unless in exceptional circumstances ✓ Consider ecosystem service impacts and appropriate mitigation	Yes		Green spaces provide critical habitats for urban wildlife, helping to maintain ecological balance within densely populated environments. These spaces also assist drainage by providing natural drainage systems (SUDS) to manage flood risk and stabilise the soil substrata.	

Brighton & Hove Sustainability Implications checklist for report writers

	✓ Consider use of nature-based solutions ✓ Support the ambitions and aspirations of The Living Coast Biosphere ✓ Consider how local communities can be engaged and benefit from improvements to their natural environment				
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