

Cabinet

Date: **15 October 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: **Raymond Bruce-Cathline**
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Chief Executive
Hove Town Hall
Norton Road
Hove BN3 3BQ

Date of Publication - Wednesday, 7 October 2026

AGENDA

Part One

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48 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

49 MINUTES

To consider the minutes of the meeting held on 17th September 2026.

50 CHAIR'S COMMUNICATIONS

51 CALL OVER

52 PUBLIC INVOLVEMENT

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

- (a) **Petitions:**
To receive any petitions presented by members of the public.
- (b) **Written Questions:**
To receive any questions submitted by the due date of 12 noon on the 9th October 2026.
- (c) **Deputations:**
To receive any deputations submitted by the due date of 10am on the 5th October 2026.

53 ISSUES RAISED BY MEMBERS

To consider the following matters raised by Members:

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

54 MATTERS REFERRED TO THE EXECUTIVE

55 REPRESENTATIONS FROM OPPOSITION MEMBERS

56 ROYAL PAVILION GARDENS RESTORATION PROJECT 7 - 16

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Ward Affected: West Hill & North Laine

57 ADVERTISING AND SPONSORSHIP 17 - 54

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58 BLACK ROCK FUTURE VISION AND MEANWHILE USE. 55 - 68

Contact Officer: Katie Read
Ward Affected: Kemptown

59 STREETLIGHTING CONTRACT EXTENSION 69 - 74

Contact Officer: Tracy Beverley
Ward Affected: All Wards

60 TARGETED BUDGET MANAGEMENT (TBM) 2026/27 MONTH 5 (AUGUST) 75 - 112

Contact Officer: Elizabeth Griffiths
Ward Affected: All Wards

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61 BLACK ROCK FUTURE VISION AND MEANWHILE USE (EXEMPT CATEGORY 3) 113 - 128

Contact Officer: Alison Mcmanamon
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62 STREETLIGHTING CONTRACT EXTENSION (EXEMPT CATEGORY 3 AND 5) 129 - 132

Contact Officer: Tracy Beverley
Ward Affected: All Wards

63 PART TWO MINUTES OF THE PREVIOUS MEETING

To consider the Part Two minutes of the meeting held on 17th September 2026.

64 PART TWO PROCEEDINGS

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

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Further information

For further details and general enquiries about this meeting contact Raymond Bruce-Cathline, (01273 29 1354, email raymond.bruce-cathline@brighton-hove.gov.uk) or email democratic.services@brighton-hove.gov.uk

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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 56

Subject: Royal Pavilion Gardens restoration project

Date of meeting: Thursday, 15 October 2026

Report of: Cabinet Member for The Economy, Culture, Heritage and Tourism

Lead Officer: Alison McManamon Corporate Director- City Operations

Contact Officer: Nicholas Fishlock, Programme Manager

Email: nick.fishlock@brighton-hove.gov.uk

Ward(s) affected: West Hill & North Laine;

Key Decision: Yes

Reason(s) Key: Expenditure which is, or the making of savings which are, significant having regard to the expenditure of the City Council's budget, namely above £1,000,000.

For general release

1. Purpose of the report and policy context

- 1.1 This report seeks Cabinet approval for a revised total project budget for the Royal Pavilion Gardens restoration project and authority to enter into the main works contract. The council has previously approved £750,000 financial contributions to the project and this report does not seek approval for further direct funding. All other project costs are funded by external sources including the Royal Pavilion and Museums Trust and National Lottery Heritage Fund. The report outlines the project costs and funding in section 3. Context and background information.
- 1.2 The project supports the Council Plan objective of "A city to be proud of" by conserving and enhancing one of the city's most important public heritage spaces, improving accessibility, strengthening community use, supporting visitor economy outcomes and protecting the long-term condition of a nationally significant historic garden.

2. Recommendations

- 2.1 Cabinet agrees a budget increase of £1.600m funded by National Lottery Heritage Funding, Historic England Grant and RPMT donations. This takes the total project to £8.038m for the delivery of the restoration project works.

- 2.2 Cabinet delegates authority to the Corporate Director – City Operations, in consultation with the Cabinet Member for Economy, Culture, Heritage and Tourism, to enter into a contract to appoint a Main Contractor to carry out the restoration works to the Royal Pavilion Garden within the project cost plan. Subject to receiving approval of additional £0.500m funding from Historic England.

3. Context and background information

- 3.1 The Memorandum of Understanding signed by the council, Royal Pavilion and Museums Trust [RPMT] and Brighton Dome Brighton Festival on 18 August 2014 proposes to redevelop and improve the Royal Pavilion Estate as a world class cultural and heritage site by integrating the Royal Pavilion, Brighton Dome, Brighton Museum & Art Gallery, Corn Exchange and Studio Theatre with their historic setting, improving the world class centre piece of Brighton & Hove's city centre. The capital works will seek not only to improve the Royal Pavilion Estate, but also restore some of the connectivity between Brighton Dome, the Brighton Museum & Art Gallery and the Royal Pavilion, which will enable further co-working in the future on the delivery of cultural events and celebration of the parties' unique heritage.
- 3.2 The improvement programme is being delivered in phases to enhance the visitor experience, conserve the Estate's heritage and improve the long-term sustainability of the council's freehold assets. The first phase, comprising the restoration of Brighton Dome's Corn Exchange and Studio Theatre, was completed in 2023.
- 3.3 The Garden sits within land leased and managed by the Royal Pavillion and Museums Trust. Historic England placed the Garden on its Heritage at Risk Register in 2017 and since this time a programme to protect and maintain the Garden and its infrastructure has been in development. The restoration project has since been developed jointly by the council and RPMT to address the Garden's condition and secure its long-term future.
- 3.4 In November 2017, Policy, Resources & Growth Committee approved the submission of a National Lottery Heritage Fund (NLHF) bid for the Garden and allocated £1.000m of council capital funding, split equally between the Garden and Royal Pavilion.
- 3.5 In October 2019, Policy & Resources Committee reallocated the £0.500m intended for the Royal Pavilion to the urgent replacement of the Brighton Museum & Art Gallery roof. The remaining £0.500m council allocation to the Garden was retained.
- 3.6 In August 2023, Strategy, Finance & City Regeneration Committee approved a further council contribution of up to £0.250m towards new public toilets within the Garden project. It also delegated authority to procure and appoint a main contractor following a successful NLHF bid. The council's approved capital contribution to the Garden project is therefore £0.750m.

- 3.7 NLHF subsequently awarded grant funding jointly to the council and RPMT, reflecting their respective roles as freeholder and leaseholder and their joint responsibility for delivering the project. A Collaboration Agreement sets out each party's responsibilities and the allocation of project risks. The project is overseen by a Project Team comprising council and RPMT officers and the project's professional advisers.
- 3.8 Planning approval was granted in 2024 to restore the regency planting and protection and promotion of local biodiversity; reinstate the historic boundary based on the original 19th century railing designs; provide new visitor and community facilities, more accessible information and increased community engagement opportunities; and to repair, conserve and enhance historic elements, including the garden entrances and pathways.
- 3.9 Project costs have increased during design development due to the cumulative effects of the COVID-19 pandemic, planning delays, construction inflation, higher material costs and additional professional fees.
- 3.10 In August 2023, the estimated total project cost was £6.264m, including capital of £4.241m. By detailed design in December 2025, this had increased to £8.228m including estimated capital works of £5.976m.
- 3.11 In response, the Project Team undertook a detailed review of the design, procurement and delivery approach while protecting the project's essential heritage outcomes and NLHF approved purposes. By February 2026, this reduced the forecast project cost to £7.139m, including estimated capital works of £4.614m.
- 3.12 Under a two-stage competitive flexible tender process, 14 expressions of interest were submitted. Four contractors were shortlisted based on financial standing, technical capability and relevant experience. Two contractors submitted tenders, reflecting prevailing market conditions, contractor capacity and individual tendering decisions, rather than any limitation in the competitiveness or openness of the procurement process. The bids showed significant market testing. Blakedown Landscapes was identified as the preferred contractor as the most economically advantageous tenderer.
- 3.13 Following negotiations and value engineering, the proposed contract sum is £5.174m. Further value engineering opportunities have been identified and will continue to be explored where these do not compromise the project's approved outcomes.
- 3.14 The tender resulted in increased costs of £1.476m above the funding awarded and planned to be secured. NLHF has subsequently awarded an additional £0.976m, substantially reducing the shortfall. An application has also been made to Historic England for a further £0.500m and is to be determined imminently.
- 3.15 After considering all of the work undertaken to date outlined in the paragraphs preceding this the revised total project budget is £8.038m.

Identified funding exceeds this amount, providing some flexibility should elements of anticipated external fundraising not be secured.

Figure 1: Current project budget and funding

	Total Project Cost (£'000)	Funding secured (£,000)	Funding to be secured (£,000)	Funding total (£,000)	Notes
Capital work	6,244				incl. professional fees
Activities	959				
Contingency	835				
BHCC Capital Receipts		310		310	
BHCC Borrowing		440		440	
Other public sector grant		247	585	832	Funding set to be announced early October
National Lottery Heritage Fund grant		5,346		5,346	
Other external contributions (collected by RPMT)		644	466	1,110	RPMT have confirmed on track to achieve
Total	8,038	6,987	1,051	8,038	

- 3.16 The refurbishment of the public toilets, which together with a new concession will be leased to RPMT, is expected to reduce the council's ongoing management costs by approximately £0.024m per year. In 2025, additional maintenance and security costs resulted in total operating costs of £0.091m.
- 3.17 Some external funding remains to be secured. A decision is awaited on the additional £500,000 requested from Historic England. The council has also applied to Arts Council England for £0.085m. RPMT is pursuing the remaining third-party grants, donations and other income through its fundraising programme. The council will not be required to apply for, manage or directly receive those RPMT contributions.
- 3.18 No additional direct council funding is requested through this report. The project includes a contingency allowance to manage delivery risks. Under the Collaboration Agreement, costs exceeding the available contingency would generally be shared between the council and RPMT. This risk is being managed through project contingency, continued value engineering and RPMT's fundraising programme.
- 3.19 Subject to Cabinet approval and completion of the funding and contractual arrangements, the current programme is:

Figure 2: Delivery programme

Milestone	Date
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Additional funding applications submitted	14 September 2026
Funding decisions expected	23 September 2026
Contract execution (on receiving Cabinet approval)	22 October 2026
Estimated work start	09 November 2026
Estimated completion	November 2027

- 3.20 The programme remains achievable but depends on Cabinet approval, completion of construction contract documents and prompt contract execution, and contractor mobilisation. Delays could result in further inflation, additional professional fees, programme disruption and changes to the sequencing of seasonal planting.

4. Analysis and consideration of alternative options

- 4.1 The project has received prior Committee approvals, planning approvals, and has a complete design. On receipt of the required funding, it can proceed.
- 4.2 In case the £1.050m funding yet to be secured is not received and in effect leaving the project not fully funded; the project team have prepared a list of work packages that could be omitted from the project. Each of these elements would reduce the scope of the project, but allows the project costs to be managed within the approved funding envelope without further impacts on the council's financial position. The elements have been chosen to minimise impact on the purposes of the project agreed between the project team and the funders. The NLHF funding is linked to delivering these Agreed Purposes.
- 4.3 The project team have attempted to find a way for the ice rink to return to the Pavilion site over winter 2026/2027. However, work will be happening on the ice rink site throughout the winter period, and it is not possible to delay the start of the project without significant cost and funding implications.

5. Community engagement and consultation

- 5.1 An initial unsuccessful NLHF submission for the whole Estate was informed by a series of consultation and engagement sessions, which included workshops, presentations and surveys undertaken with a variety of stakeholders. In relation to the Garden, several stakeholder workshops, including one solely for young people was held along with public consultation in the Garden and an exhibition in Jubilee Library along with an online survey on the council's consultation portal.
- 5.2 An online survey completed in 2018 informed the NLHF bid for development funds. It was completed by 1,363 Brighton and Hove residents who were regular visitors to the Garden, travelling through it, or to sit and relax. Those who responded were visiting the buildings in it or using the Garden as a place to meet friends and to use the café.
- 5.3 Preparation of the Activity Plan for the NLHF Round 2 application included public consultation in summer 2022 consisting of; on-line surveys; individual

interviews with identified stakeholders; two focus groups with local adult residents; one focus group with young people aged 17 to 24 years old with special educational needs; five focus groups and follow up phone calls with 21 individuals working with young people, low income families and adults supporting people with disabilities or ill health and in community support organisations in Brighton and Hove; and focus groups with primary and secondary school teachers.

- 5.4 The project underwent a statutory consultation informing the planning process and consent.

6. Financial implications

- 6.1 Cabinet is asked to approve a £1.600m budget increase, bringing the total project budget to £8.038m following the project team's review of estimated costs. The council's capital programme currently includes a £6.437m budget, funded by a previously approved council contribution of £0.750m, of which only £0.440 is borrowing. The balance of £5.687m comprises secured external grants and donations received by RPMT.
- 6.2 The £1.600m increase will be funded by £0.550m of secured NLHF grant, a £0.500m Historic England grant application due for determination in early October, and £0.550m of RPMT donations yet to be secured. Council officers continue to meet with RPMT, which has confirmed that fundraising is on track.
- 6.3 As set out in paragraph 4.2, the council's financial exposure if external funding is not secured will be managed by reducing the project scope to within the adjusted budget position while retaining the agreed purposes required to meet NLHF grant conditions.
- 6.4 The £8.038m budget includes contingency allowances of 12.5% for works and 7.5% for other costs, which are considered sufficient at this stage. If an overspend is forecast during delivery, the project team will review the scope to keep costs within the approved budget. If this is not achievable, any remaining overspend will be shared equally between the council and RPMT under the Collaboration Agreement signed in September 2026.
- 6.5 The council's total project contribution is £0.750m, of which £0.440m is funded through borrowing. The associated financing costs are included in the Corporate Financing budget and current MTFS projections. Based on PWLB rates at 2 October 2026, annual borrowing costs are estimated at £0.046m.

Name of finance officer consulted: Craig Garoghan

Date consulted: 02/10/2026

7. Legal implications

- 7.1 The building contract to appoint a Main Contractor to carry out the restoration works to the Royal Pavilion Garden is procured under the

Procurement Act 2023 ('the Act') by the Council and is above the regulatory threshold for works contracts under the Act. The building contract will be in the form of a JCT Intermediate Building Contract (ICD 2024) supported by the bespoke Schedule of Amendments. The Council's Contract Standing Orders (CSOs) will also apply to this procurement exercise.

- 7.2 The legal team will assist with completing the Schedule of Amendments supporting the building contract, forming and executing the agreement.

Name of lawyer consulted: Sabina Cherevichenko

Date consulted: 21/09/2026

8. Risk implications

- 8.1 Project risks have been actively managed and mitigated throughout the development of the scheme. This has included preparation of a detailed design, completion of relevant surveys and a competitive procurement process. These measures have reduced uncertainty in relation to the scope, cost and delivery of the works.
- 8.2 **Final cost of the works exceeds the approved project budget.** This risk has been mitigated through the development of a detailed design, completion of surveys to identify potential issues prior to construction, value engineering, competitive procurement and provision of an appropriate project contingency. Notwithstanding these measures, some financial risk will remain throughout the construction period, particularly where unforeseen site conditions or other unexpected issues arise.
- 8.3 **Construction programme.** Delays could increase project costs and may have implications for meeting the timescales associated with external funding. This risk will be managed through close monitoring of the construction programme, proactive identification and resolution of emerging issues, and effective contract and project management throughout delivery.
- 8.4 **Poor contract or project management** could adversely affect cost, programme and the quality of the completed works. This risk has been reduced by ensuring suitable internal and external project management resource arrangements are in place to oversee delivery.
- 8.5 The design team will remain engaged throughout the construction period, including undertaking a Clerk of Works role and carrying out regular site visits. This will provide ongoing oversight of the quality of construction, help ensure that works are delivered in accordance with the approved design, enable issues to be identified at an early stage and support their timely resolution.

9. Equalities implications

- 9.1 The proposed works to the Royal Pavilion Garden will improve facilities and safety to promote increased access. The application to NLHF includes providing a Changing Places toilet that enables access for people with

disabilities and therefore removes barriers to use of the Garden. Increasing access for vulnerable communities meets both NLHF's funding criteria and importantly provides a much-needed city centre facility. There will be no financial charge for the Changing Places toilet, which will be accessed through the RADAR Key scheme. This Changing Places toilet will complement the network that is currently in development across the city. Providing facilities at this site would contribute to making Brighton & Hove more accessible, aligned with the Accessible City strategy.

- 9.2 The improved educational space and the Activity Plan provided within the project will further increase access for schools and marginalised groups to the Royal Pavilion Estate activities. Plans include creating a Community Forum that will be a local community advisory group working with RPMT to make suggestions about future management and activities. The Forum will have a Terms of Reference and will include representatives of the target audiences for the project.

10. Sustainability implications

- 10.1 The proposed capital works will restore the Regency Garden and secure its sustainable future by delivering against the Conservation Plan and a costed Management and Maintenance Plan. This aims to achieve the principal project outcome of removing the Garden from the At Risk Register. This will promote healthy, safe and secure environments, and protect and enhance local habitats.
- 10.2 The principal risks to the Garden include the continued deterioration of the fabric and quality and the loss of the Garden's listed status. This would contribute to reduced future resilience and impact on the use and enjoyment of the Garden by residents and visitors.

11. Health and Wellbeing Implications:

- 11.1 Protecting the Garden and improving public safety will contribute to better environmental conditions that have a beneficial effect on people's enjoyment of the green space. Providing a Changing Places toilet facility and retaining public access toilets in a city centre location will also contribute to health and wellbeing outcomes (including health life expectancy) and help deliver the aims of our Health and Wellbeing Strategy, including: using green & open spaces to improve wellbeing; being an age friendly city; considering the needs of our ageing population in the design of the physical environment; and reducing social isolation and loneliness.

Other Implications

12. Procurement implications

- 12.1 As described in paragraphs 3.12 and 3.13 of this report, a compliant procurement process has taken place and the construction contract can be executed on approval of the recommendations in this report.

13. Crime & disorder implications:

- 13.1 The Garden experiences considerable levels of antisocial behaviour, particularly during the early hours of the morning. A City Safe Zone initiative, led by BHCC officers, with funding support from NLHF is being developed in response to those challenges.
- 13.2 An innovative, prevention-focused partnership has been developed, bringing together community safety, public health, heritage, culture, local businesses and community organisations. The aim is not simply to respond to incidents after they have happened, but to intervene earlier, reduce harm and create a Garden that feels safer, more welcoming and better cared for.
- 13.3 The proposed programme includes visible safety marshals during higher-risk periods, outreach and support for vulnerable people, work with local venues to improve safety in the night-time economy, and community, cultural and environmental activities that encourage positive use and greater stewardship of the Garden.
- 13.4 This work has attracted support and funding from Public Health which has committed £50k to support the pilot, with match funding worth £35k leveraged from citywide stakeholders. Further investment is being sought to develop the programme and maximise its impact.
- 13.5 The ambition is to develop a model that works not only for the Royal Pavilion Garden and New Road, but which could be evaluated, expanded to other parts of the city and potentially shared nationally.

14. Conclusion

- 14.1 The Royal Pavilion Garden is one of Brighton & Hove's most significant heritage assets and an integral part of the wider Royal Pavilion Estate. The proposed restoration project represents an opportunity to safeguard the long-term future of this nationally important historic landscape, improve accessibility and visitor facilities, enhance biodiversity, strengthen community engagement, and support the city's cultural and visitor economy objectives.
- 14.2 The project has been developed with RPMT over several years through extensive consultation, detailed design, planning approvals, and collaboration with external funders. The scheme directly addresses the issues that led to the Garden being placed on Historic England Heritage at Risk Register and secures its long-term conservation.
- 14.3 The procurement process has been completed through a competitive tender exercise, and significant value engineering has been undertaken to ensure the project remains affordable while maintaining the key heritage, accessibility, environmental and community outcomes required by funders. The project benefits from substantial external investment, including funding from the National Lottery Heritage Fund, reducing the financial burden on

RPMT and the council while enabling delivery of a major improvement to a landmark public space.

- 14.4 Approval of the recommendations will enable the council to proceed with contract award and delivery of the restoration works. Cabinet is therefore recommended to approve the revised project budget and delegate authority to enter into the main works contract for the delivery of the Royal Pavilion Garden restoration project.

Brighton & Hove City Council

Cabinet

Agenda Item 57

Subject: Advertising and Sponsorship

Date of meeting: Thursday, 15 October 2026

Report of: Cabinet Member for Customer Services, Public Realm & Local Government

Lead Officer: Director for People and Innovation

Contact Officer: Natalie Orringe, Head of Strategic Communications and Engagement

Email: Natalie.Orringe@brighton-hove.gov.uk

Ward(s) affected: (All Wards);

Key Decision: Yes

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

For general release

1. Purpose of the report and policy context

- 1.1 This report introduces the Council's Advertising and Sponsorship Policy, designed to provide a clear, consistent and transparent council-wide framework for managing all advertising, sponsorship and promotional activities, including brand activation on council-owned and managed assets. The policy seeks to ensure compliance with legal and regulatory requirements, whilst promoting council values and protecting the Council's reputation by preventing conflicts of interest or perceptions of undue influence. It will also help to unlock sustainable income streams at scale, contributing directly to the Council's Medium Term Financial Strategy, as well as delivering public realm benefits, and promoting Brighton & Hove as a vibrant place to live, work and visit.
- 1.2 Implementation of this policy will enable confident and diligent decision making about the commercial partnerships, advertising and sponsorship arrangements the Council enters into, ensuring these align with the council's aim to build a better Brighton & Hove for all through:
- Enhancing the city's public realm, reputation, cultural life, and visitor offer,
 - Promoting fairness, inclusion, accessibility and community benefit,
 - Protecting and improving public health, wellbeing and safety, and
 - Supporting the financial sustainability of the council, good governance, service improvement.

- 1.3 The policy does not seek to regulate advertising on privately owned assets or determine decisions under separate regimes.

2. Recommendations

- 2.1 Cabinet approves the Advertising and Sponsorship Policy in Appendix 1, including the safeguards, prohibited and restricted categories, governance arrangements, approval levels and review provisions set out in the policy.
- 2.2 Cabinet notes the intention to undertake an initial pilot, identifying 3-5 low-risk sites for advertising wraps, banners and hoardings to test demand for advertising space, the application of the policy, and secure early income. Insights from the pilot will be used to refine future delivery in line with the Council's learning framework.
- 2.3 Cabinet agrees for the Council to join the Coalition to End Gambling Ads (CEGA) and authorises the Director of Public Health and Head of Strategic Communications and Engagement to complete the membership arrangements and prepare appropriate communications activity.
- 2.4 Cabinet delegates authority to the Director for People and Innovation, in consultation with the relevant Cabinet Member, to make minor amendments to the policy and supporting guidance that do not change the substantive purpose of the policy or the prohibitions agreed by Cabinet.

3. Context and background information

- 3.1 The council owns and manages a wide portfolio of assets, amenities and infrastructure, and delivers events, programmes and schemes that provide a material opportunity for income generation from advertising, sponsorship and brand activation. A recent asset audit indicates that the city has good underlying advertising fundamentals, including a recognised national and international identity; major visitor economy; prominent seafront; significant retail, leisure and hospitality activity; strong events profile; and substantial student population and younger resident profile. To-date, the commercial opportunities presented by these characteristics have not been maximised, largely because of fragmented decision-making and engagement with partners and agencies. A coordinated approach to managing commercial partnerships across all council-owned and managed assets, supported by this policy, will maximise the value of these opportunities and deliver more sustainable income streams for the Council. This is a practical opportunity to make a positive contribution to the Council's Medium Term Financial Strategy by converting currently underused advertising, sponsorship and partnership potential into managed, recurring income.
- 3.2 The opportunities identified for council-owned and managed assets are broad and varied, including freestanding digital advertising units, large-format advertising, temporary building wraps or banners, brand activations,

partnerships, and smaller scale public-realm opportunities such as bicycle parking, guardrails and wayfinding signage. To ensure future commercial activity upholds the Council's values, corporate priorities and legal obligations, the proposed policy establishes a control framework, setting out the conditions under which advertising, sponsorship and commercial partnerships are acceptable, namely they must;

- protect public trust in line with council values and priorities,
- support the Council's social, health, equality and environmental objectives, and
- contribute positively to the quality, accessibility and identity of the public realm.

- 3.3 Crucially the policy includes an assessment framework, ethical safeguards and an approval matrix to ensure impartiality and compliance with statutory guidance and industry codes of practice. It will allow the Council to shape a coherent, city-wide opportunity pipeline rather than relying on ad hoc, service-level decisions.
- 3.4 Realising these opportunities will require a disciplined public-realm first approach. This means that decisions about advertising and sponsorship opportunities will start with the purpose, character and use of council-owned places and assets as civic spaces and public-facing channels, rather than with commercial value alone. It is proposed that an initial pilot is run before the end of the calendar year on 3-5 low-risk advertising sites for wraps, banners and hoardings, to test demand, the application of the policy in practice, and to secure early income.
- 3.5 Existing third-party agreements will remain subject to their contractual terms until they are varied or renewed. Adoption of the policy will not override existing contractual rights or obligations. The policy should be incorporated into new and renewed contracts, with suitable monitoring, removal and termination provisions, so that commercial operators and partners are required to work within the Council's public value tests, public-realm expectations and agreed safeguards.

4. Proposed prohibitions, restrictions and approval matrix

- 4.1 The policy outlines clear, specific and proportionate prohibitions on advertising, sponsorship and brand activations on council-owned and managed assets that do not align with the Council's values and priorities. It prohibits opportunities that may cause harm, promote illegal activities or undermine public confidence in the Council, for example the promotion of tobacco or gambling. Implementation of the policy will seek to balance freedom of expression and commercial activity with the Council's duties relating to public health, community wellbeing.
- 4.2 Consistent with this proposed prohibition the Council has been invited to join the Coalition to End Gambling Ads (CEGA). Joining CEGA aligns with the Council's commitment to putting the wellbeing of residents first and helps create a healthier, more inclusive city that protects children and vulnerable

adults from potential harm. Being a member will strengthen a key aim of the Advertising and Sponsorship policy in ensuring that commercial activity on council assets is aligned with public health objectives and community wellbeing. As a member, the Council may share campaign content, contribute to events or political roundtables, or develop its own campaigns.

- 4.3 The policy also incorporates the existing approach to the advertisement of food and non-alcoholic drink products high in fat, salt or sugar, and advocates for a product-based view rather than a blanket prohibition on brands. This enables businesses to advertise compliant, healthier products. Alcohol advertising and sponsorship will be considered only on a restricted, case-by-case basis, taking account of content, placement, audience, public health and reputational risk. The same will apply to financial services where products are not exploitative and messaging is responsible and clear.
- 4.4 All advertising, sponsorship and brand activation propositions on council-owned and managed assets will be assessed for their public and commercial benefit; compliance with the policy and applicable law; and the regulatory history of the proposed advertiser or sponsor. Wider impacts on public health; equality; safeguarding; accessibility; climate and the environment; heritage; highways and public realm are also part of the assessment framework. Application of this framework will not predetermine decisions taken under separate statutory regimes, including planning licensing highways and procurement functions.
- 4.5 A proportionate approach to approvals is proposed whereby opportunities assessed as low-risk will be approved by the relevant Head of Service, in consultation with Strategic Communications and Engagement. Medium-risk opportunities, which may include new partners, restricted categories and higher value proposals, will require relevant Director or delegated senior officer approval. High-risk opportunities that may be high-profile, particularly sensitive or novel, will require a decision by the relevant Corporate Director with Cabinet Member involvement as appropriate. Any substantive departure from the agreed policy will be referred back to Cabinet.
- 4.6 The policy will be reviewed annually, or sooner where legislative, public health, or strategic priorities change.

5. Analysis and consideration of alternative options

- 5.1 Without a policy in place there will continue to be a disjointed approach to approval of advertising, sponsorship and brand activations, relying on service-level decisions or policy set by agencies and contractors. Whilst this would retain flexibility, it leads to inconsistent controls, the loss of potential value, unclear accountability, a lack of central oversight and avoidable reputational and regulatory risk. It is therefore not the recommended way forward.

- 5.2 Adopting any wider blanket prohibitions could simplify decision-making but unnecessarily limit appropriate commercial opportunities and the scope of income generation. The proposed approach uses absolute prohibitions for the clearest harms and proportionate, product-based or case-by-case controls for other categories, whilst prioritising community wellbeing and public value.
- 5.3. Not becoming a CEGA member would avoid external affiliation but not reflect the policy's proposed position on gambling advertising or support the Council's commitment to protecting vulnerable children and adults and promoting community wellbeing. Almost 20 other local authorities across the UK are already members. Membership has no fee and the Council can determine the extent of its involvement.

6. Community engagement and consultation

- 6.1 The draft policy was initiated through conversations with other local authorities about their approach to commercial activity and governance of income generation from advertising. It has been informed by a wide review of other council policies and discussions with lead Members about the impact of other commercial partnership activity in the city and its alignment with council values and priorities.
- 6.2 The draft has been developed further through cross-departmental input, including Strategic Communications and Engagement, Public Health, Culture and Events, Property, Planning, Licensing and operational services. This has helped to strengthen the policy by broadening its scope, further clarifying prohibited and restricted categories, enhancing the regulatory and public health safeguards, and ensuring that planning, heritage, equality, reputational and commercial considerations are properly reflected. The engagement has also made the policy more practical to implement by refining its due-diligence requirements, approval and escalation routes, supported by officer guidance and a proposed test-and-learn delivery approach.

7. Financial implications

- 7.1 The policy establishes controls but does not itself guarantee income. As opportunities are developed, they are expected to contribute to the Council's Medium Term Financial Strategy by generating new revenue from council-owned and managed assets. Each opportunity will require a proportionate assessment of income, costs (including legal, procurement, finance, property and operational services), liabilities, tax and business rates, officer capacity and any benefit in kind. CEGA membership carries no fee.

Name of finance officer consulted: Ishemupenyu Chagonda
Date consulted: 11/09/2026

8. Legal implications

- 8.1 The policy and any legal agreement entered into by the Council must operate within applicable advertising, local government, equality, procurement, subsidy control, planning, highways, licensing, data protection and contract requirements. Adoption of the policy will not override existing contractual rights or predetermine statutory decisions. Written agreements and legal review will be required proportionate to the risk and value of each arrangement

Name of lawyer consulted: Siobhan Fry Date consulted: 24/09/26

9. Risk implications

- 9.1 Without a council-wide framework there is a risk of inconsistent decisions, inappropriate associations, unmanaged conflicts, non-compliance with contractual or statutory requirements and damage to public trust. The proposed mitigations are clear prohibitions, documented assessment criteria, tiered approvals, specialist advice, written agreements, central oversight, a decision register, removal and termination arrangements and scheduled review.
- 9.2 Implementation risks include potential effects on income, delay caused by unclear approval routes, inconsistent application between services and attempts to apply the policy beyond existing contractual rights. These will be managed through clear guidance, named ownership, contract review, the and monitoring of financial and operational effects. Any further risks and issues affecting implementation will be teased out through an initial pilot phase, focused on 3-5 low-risk wraps, banners and hoardings sites to test demand and secure early income.
- 9.3 There is also a risk that delivery costs and officer capacity requirements could reduce net income if not managed carefully. This will be mitigated by assessing the full cost of delivery before progressing opportunities and ensuring that implementation costs are recovered from generated income wherever possible.

10. Equalities implications

- 10.1 The policy is intended to reduce exposure to harmful, exploitative, discriminatory or misleading advertising and provide additional safeguards for children and vulnerable residents. Decisions will consider the Public Sector Equality Duty, accessibility, placement and likely audience. A full equalities impact assessment is in Appendix 2.

11. Sustainability implications

- 11.1 Proposals will be assessed for energy and resource use, carbon emissions, waste, biodiversity, air quality, the environmental practices and potential environmental harms of proposed advertisers and sponsors' products, brands or services, and the effect on the public realm. Requirements for digital infrastructure will address efficiency, maintenance, operating hours and end-of-life arrangements where appropriate.

12. Health and Wellbeing Implications

- 12.1 The policy supports a healthier advertising environment through the proposed prohibition of gambling, tobacco, vaping and exploitative financial products, product-based HFSS restrictions and case-by-case controls for alcohol, other financial products, services or brands with potentially harmful environmental impacts. Joining CEGA supports the Council's proposed position on preventing gambling-related harm.

Other Implications

13. Procurement implications

- 13.1 Advertising, sponsorship and brand activation opportunities may constitute concessions, licences, leases, services, works or mixed arrangements. The appropriate route to market will be determined for each opportunity. New procurements and contracts will include policy compliance, social value, reporting, transparency, audit, removal, termination and reinstatement provisions.

14. Crime & disorder implications:

- 14.1 The policy prohibits content promoting illegal, violent or socially harmful behaviour and supports restrictions relating to addictive substances and gambling. Site-specific proposals will also consider lighting, obstruction, pedestrian safety, anti-social behaviour and other community safety implications.

15. Conclusion

- 15.1 The proposed policy provides the foundation needed to pursue advertising and sponsorship income responsibly. It makes the Council's red lines explicit, introduces proportionate approval and escalation routes, protects statutory and regulatory independence, and creates the records and contractual controls required for accountability and audit.
- 15.2 Approving the policy, initial pilot and CEGA membership will allow the Council to balance commercial ambition with public health, equality, safeguarding, environmental and reputational responsibilities. The pilot will provide practical learning, in line with the learning framework, to refine implementation before activity is scaled to making a sustainable contribution to the Council's Medium-Term Financial Strategy.

Supporting Documentation

Appendices

1. Advertising and Sponsorship Policy
2. Equality Impact Assessment

Brighton & Hove City Council

Advertising and Sponsorship Policy

1. Objectives

Opportunities to advertise and/or partner with the Council as a sponsor are available to businesses and organisations to promote their brand, products and services. Brighton & Hove City Council aims to develop advertising and sponsorship opportunities on its assets for the purpose of generating income for the Council and directly enable a better Brighton and Hove for all. Opportunities should support, and not undermine, the Council's priorities to create a city to be proud of, a fair and inclusive city, a healthy city that helps people to thrive, and a responsive and learning council with well-run services.

2. Purpose of the policy

This policy sets out the terms under which Brighton & Hove City Council ("the Council") may seek, accept, refuse, or withdraw advertising, sponsorship and brand activations.

The policy provides a clear, transparent framework to ensure that all advertising, sponsorship and brand activation arrangements:

- Enable positive partnerships with responsible organisations that align and support the priorities of the Council and the commitment to ensure a better Brighton and Hove for all. This includes specifically promoting the city as vibrant, welcoming place to live, work and visit.
- Generate sustainable revenue for reinvestment in council services.
- Provide exceptional value for money, while giving due weight to environmental, social, and equality considerations.
- Safeguard public health, the environment and the look and feel of the city.
- Comply with relevant legislation and industry codes.
- Uphold the Council's reputation, values, and are developed in line with, and to support, the Council's brand and marketing guidelines.

3. Definitions

Advertising

Paid placement of content on council-controlled assets (including but not limited to websites, social media, publications, buildings, vehicles, highways, seafront, hoardings and digital screens) by external organisations, whereby they gain publicity in the form of advertisement.

Sponsorship

A commercial or non-commercial arrangement where an organisation or individual provides funding, resources, or benefits in kind in exchange for recognition or association with council assets, services, projects, programmes, or events, whereby they gain publicity or other benefits.

Brand Activation

A marketing activity or experience on a council-controlled asset that brings a brand to life by engaging people directly, creating memorable interactions that build awareness, loyalty and participation.

4. Scope and application

This policy applies to:

- All council-owned and council-managed advertising assets.
- All sponsorship arrangements relating to council services, assets, and activities.
- Commercial advertising and media partnerships across print, digital content, digital platforms, social media, audio, video, image and experiential assets.
- Community, cultural, and partnership-based sponsorships.

Exclusions:

- Property fully leased to third parties (unless otherwise agreed on a case by case basis).
- Advertising governed by separate, existing concession contracts (e.g. bus shelter advertising), until such contracts are renewed or varied.

5. Guiding principles

The Council is actively pursuing advertising, sponsorship and brand activation opportunities that will support the delivery of Council Plan outcomes including:

- Enhancing the city's public realm, reputation, cultural life, visitor offer or local pride,
- Promoting fairness, inclusion, accessibility and community benefit,
- Protecting and improving public health, wellbeing and safety,
- Supporting financial sustainability, good governance, service improvement.

The Council will use due diligence and proportionate controls to balance income generation with public health, equality, and reputational considerations.

All advertising, sponsorship and brand activation must:

- Be legal, decent, honest, and truthful,
- Be socially responsible,

- Avoid harm to public health, safety, or wellbeing,
- Protect children and vulnerable groups by preventing exposure to harmful, exploitative, inappropriate or misleading products, services or messages,
- Be designed to have minimal climate impact and developed in line with the Council's commitment to environmental sustainability and net zero ambitions,
- Uphold equality, diversity, and inclusion and not discriminate on the grounds of age, race, colour, national origin, religion or belief, sexual orientation, gender or disability,
- Avoid conflicts of interest or perceptions of undue influence by the Council,
- Comply with the guidelines laid out by the Advertising Standards Agency (ASA)
- Uphold the rules laid out in the UK Code of Non-broadcast Advertising, Sales, Promotion and Direct Marketing (CAP Code),
- Take account of the Code of Practice on Local Authority Publicity.

The Council reserves the right to refuse, approve subject to conditions, suspend, or withdraw any advertising or sponsorship arrangement that does not comply with this policy.

5. Assessment framework

In making its decisions, the Council will apply a proportionate approach, taking into account the:

- anticipated benefits of the opportunity,
- nature, severity and likelihood of any actual or potential risks,
- adequacy and effectiveness of any proposed mitigation measures,
- environmental and sustainability impacts of the activity, which may include:
 - greenhouse gas emissions and contribution to climate change;
 - energy efficiency and use of renewable energy;
 - resource consumption, waste generation and opportunities for reuse, recycling or circular economy approaches;
 - impacts on air quality, water quality, biodiversity and the natural environment;
 - environmental sustainability impacts of the product / service / brand being promoted which may include widely accepted evidence of particularly harmful environmental impacts;
 - the environmental practices, policies and commitments of the advertiser, sponsor or organisation concerned.
- advertiser's, sponsor's or associated organisation's regulatory compliance history.

The weight given to these factors will be proportionate to the nature, scale and potential impact of the advertising, sponsorship or brand activation opportunity.

6. Developing and managing opportunities

To support sustainable income and responsible partnerships, the Council may actively develop advertising, sponsorship and brand activation opportunities, such as:

- Publishing a clear offer (for example, asset inventory, media pack and/or rate card), subject to procurement and legal requirements,
- Packaging opportunities to improve value and impact (for example, multi-site campaigns, event partnerships, and themed sponsorship),
- Considering time-limited pilots where benefits are strong and risks can be monitored and managed,
- Developing naming rights arrangements where these deliver significant public benefit and are consistent with this policy, subject to appropriate governance and approval,
- Using standard terms and conditions, including placement rules, creative standards, and termination provisions,
- Applying proportionate due diligence, including checks on legality, financial standing (where relevant), and alignment with council objectives.

7. Prohibited and restricted advertising, sponsorship and brand activation

7.1 General prohibitions

The Council will not accept advertising, sponsorship or brand activation that, in its reasonable opinion, and after proportionate assessment:

- Conflicts with council policies or statutory duties,
- Damages or risks damaging the Council's reputation,
- Promotes illegal, violent, or socially harmful behaviour,
- Is discriminatory or offensive,
- Expresses political views or promotes political parties, pressure groups, or campaigns. This restriction does not apply to statutory public information, public health messaging, community awareness campaigns, charitable campaigns or equality-related communications that are consistent with the Council's duties and objectives,
- Seeks to influence council decision-making or procurement outcomes.

7.2 Specific prohibitions

The Council will not accept advertising or sponsorship relating to the following categories (absolute prohibitions):

- Political organisations or lobbying groups,
- Tobacco or related and emerging nicotine products (except where part of a national or local stop smoking campaign and central to quit support, featuring a product that is not owned or part-owned by the Tobacco Industry),
- Addictive substances,
- Weapons,
- Payday loans or exploitative financial products, where the Council considers this inconsistent with its obligations to promote financial wellbeing and protect vulnerable residents,
- Pornography or sexual services (except NHS-endorsed sexual health content),
- Gambling or gambling-related services, including games of chance,
- Companies involved in fossil fuel production.

7.3 Restricted categories (case-by-case, with conditions)

The Council may consider the following categories on a case-by-case basis where legal and regulatory requirements are met and risks can be managed through conditions (for example, placement restrictions, age-gating, creative content controls, and clear non-endorsement messaging):

- Alcohol (where responsible drinking is clearly highlighted as part of any campaign),
- Financial services (where products are not exploitative and messaging is responsible and clear),
- Food and drink brand advertising (subject to the High Fat, Sugar and Salt controls in Section 9 and Appendix 2)
- Products, services or brands with particularly harmful environmental impacts

8. Council advertising

The Council may advertise its own services as appropriate using its own platforms. This may include adverts relating to traded services which generate an income.

9. Public Health and HFSS advertising controls

The Council will restrict advertising and sponsorship of High Fat, Sugar and Salt (HFSS) food and drink products on council-owned and council-managed advertising assets.

The policy applies to:

- Outdoor advertising (including bus shelters, hoardings, digital panels),
- Advertising at council premises open to the public,
- Advertising associated with council-run or council-supported events.

9a. HFSS assessment framework

The UK Nutrient Profiling Model (NPM) shall be used to determine whether a product is classified as HFSS.

The following rules apply:

- Only non-HFSS products advertised → Approved
- Only HFSS products advertised → Rejected
- Mixed adverts including any HFSS products → Rejected
- Brand-only or price-led advertising from food/drink brands → Permitted only where the content clearly promotes non-HFSS products
- Incidental depiction of food or drink → Assessed case-by-case; HFSS imagery will normally be rejected

Exceptions may be granted only in rare and clearly justified circumstances, where a product does not make a material contribution to poor health outcomes, and must be approved by the relevant senior officer.

Refer to Appendix 2 for detailed guidance on the control of HFSS advertising in the city.

10. Ethical safeguards

The Council will not enter into advertising, sponsorship or brand activation arrangements that:

- Create a real or perceived conflict of interest,
- Could compromise, or be perceived to compromise, the Council's regulatory independence,
- Align the Council with organisations whose activities conflict with council values, priorities, regulatory responsibilities or public health objectives.

Arrangements must:

- Deliver clear public benefit
- Be proportionate and transparent
- Protect the Council's reputation and commitment to residents and communities.

The Council retains final approval over:

- Use of its name, logo, and branding

- All associated marketing and communications materials related to any advertising or sponsorship partnership.

11. Governance, approval and accountability

All advertising, sponsorship and brand activation proposals must undergo proportionate checks, as appropriate to the scale and risk of the opportunity, which may include:

- Financial appraisal
- Legal review
- Communications and reputational assessment

Approvals (tiered):

- **Low-risk, standard opportunities** (for example, routine placements using approved formats and standard terms) may be approved by the relevant Head of Service in consultation with Marketing and Communications.
- **Medium-risk opportunities** (for example, new partners, higher-value deals, or restricted categories) must be approved by the relevant Director (or delegated senior officer) following Legal and Communications input.
- **Higher-risk or high-profile opportunities** (for example, novel proposals with significant reputational sensitivity, material public health concerns, or likely public interest) must be escalated for Director-level decision and, where appropriate, Cabinet Member awareness/approval.
- **Legal agreements** (including standard terms where available) are mandatory prior to any activity commencing.

The Council may remove, suspend, or terminate advertising or sponsorship that later becomes unacceptable or non-compliant, including following complaints, regulatory action, or material changes in the partner's activities. The Council will also use complaints and performance information to refine controls and improve decision-making over time.

The Head of Strategic Communications will act as policy lead to maintain oversight of advertising and sponsorship activity across the Council.

12. Implementation and review

Corporate coordination of advertising and sponsorship sits with the Council's Marketing and Communications function.

Guidance, templates, and supporting documentation will be made available to officers and potential partners.

This policy will be reviewed annually, or sooner where legislative, public health, or strategic priorities change.

13. Disclaimer

Acceptance of advertising, sponsorship and brand activation does not constitute support or endorsement of products, services, an organisation or viewpoint, by Brighton & Hove City Council.

All relevant publications and media must carry the following disclaimer:

Whilst every effort has been made to ensure the accuracy of advertisements, Brighton & Hove City Council cannot accept liability for errors or omissions, nor for claims made by advertisers. Inclusion does not constitute endorsement.

14. Further information

For advice on advertising, sponsorship or brand activation, officers and external organisations should contact the Council's Marketing & Communications Team or refer to published guidance in the first instance:

Email: news@brighton-hove.gov.uk

Switchboard: 01273 29 00 00

Appendix 1: Advertising, Sponsorship and Brand Activation Quick Reference Guide

Step 1: Is it automatically prohibited?

If **YES** to any of the following, the proposal is likely to be rejected.

Not Allowed	Examples
Tobacco and smoking-related products	Cigarettes, vapes, heated tobacco products, nicotine pouches
Harmful addictive substances	Illegal drugs, psychoactive substances and other harmful substances that could create dependency or undermine public health
Gambling advertising or sponsorship	Betting companies, casinos, online gambling
Weapons	Guns, knives, ammunition, weapon retailers
Payday loans or exploitative financial products	Rent-to-own finance, guarantor loans, logbook loans, unregulated consumer lending
Pornography or sexual services	Adult services, explicit content, except NHS-endorsed sexual health content
Illegal, offensive or discriminatory content	Hate speech, unlawful activity, content promoting violence, discrimination or social harm

Political campaigning	Political parties, election campaigns, lobbying groups
Attempts to influence Council decisions	Sponsorship or advertising linked to procurement, planning, licensing or other Council decision-making outcomes
High Fat, Salt or Sugar product advertising	Products classified as HFSS under the UK Nutrient Profiling Model
Fossil fuel production	Exploration, extraction, production, refining, or promotion of fossil fuels, including coal, oil, gas, tar sands, and unconventional hydrocarbon extraction.

Step 2: Does it pass the basic tests?

All proposals must meet **all** of these requirements.

- ✓ Legal, honest and truthful
- ✓ Complies with ASA/CAP advertising standards
- ✓ Socially responsible
- ✓ Supports equality, diversity and inclusion
- ✓ Protects children and vulnerable people
- ✓ Does not create conflicts of interest
- ✓ Does not harm public health, safety or wellbeing
- ✓ Considers environmental sustainability and climate commitments
- ✓ Protects the city's appearance, public realm and reputation
- ✓ Aligns with Council values and priorities

Step 3: Ethical Checklist

A sponsorship proposal can proceed only if it:

- Delivers a clear public benefit
- Is transparent and proportionate
- Protects the Council's reputation
- Does not create a real or perceived conflict of interest
- Does not compromise the Council's regulatory or statutory duties
- Does not imply council endorsement

Quick Decision Matrix

Outcome	What it Means
☐ APPROVE	Meets policy requirements and presents low risk

☐ APPROVE WITH CONDITIONS	Risks can be managed through controls, restrictions or additional approvals
☒ REJECT	Falls within prohibited categories or presents unacceptable risk

When in doubt...

Stop and seek further advice from Marketing & Communications before progressing any advertising or sponsorship proposal.

Appendix 2: Control of advertising High Fat Sugar and Salt (HFSS) products

(As approved by Strategy, Finance and City Regeneration Committee on 7th December 2023)

Why is the Council controlling HFSS advertising?

Childhood obesity and overweight levels in Brighton and Hove have risen over the last few years. One in three 11-year-olds leaves primary school already overweight or obese. In some schools in the city this rises to one in two.

Nationally two out of three adults are overweight or obese, this brings with it a risk of diabetes, many cancers, heart disease and other health problems affecting our residents. Those children and adults living in more disadvantaged parts of our city have a higher chance of not being a healthy weight and suffering from the health problems that brings.

Advertising of foods that are high in fat salt and sugar has been shown to significantly increase purchase and consumption of these items. National evidence shows the relationship between the advertisement of unhealthy foods and more deprived areas. Restricting advertisements for these foods has been recommended as one of a range of evidence-based measures to reduce consumption of high calorie and less healthy food options, reducing the risk of obesity amongst children and adults.

There is currently a restriction on advertising fast food takeaways within 100 metres of any school or youth club, NHS building, or public sector building/premises/facility/park/leisure centre primarily used by those under the age of 18 (or their guardian or carers).

The main feature of the HFSS advertising policy is that it bans the direct or indirect promotion of HFSS food and drink as defined by the UK Nutrient Profiling Model (NPM), but would not ban directional adverts e.g., “McDonald restaurant 200m left” or an advert purely showing a “healthy” product.

Application of proposed policy

This policy applies to:

- Council owned outside advertising sites (e.g., Bus Shelters, advertising hoardings)
- Advertisements at Brighton & Hove Council premises open to the public

Private (non-council) advertising sites

The policy will only apply to council owned advertising sites. There are numerous advertising sites and displays both on and adjacent to the public highway. For example, there are about 30 free standing digital advertising panels which are former BT phone boxes now managed by One Digital, some are within several metres of a bus shelter. These adverts cannot be controlled by the policy and so there could be a situation where a branded HFSS product was displayed within a few metres of similar branded non HFSS product blunting the impact of the policy on public health. The same applies to advertisements in shops and other premises facing the highway.

This conflict is accepted until and unless there is comparable national legislation on the control of HFSS advertising in both the public and private realms.

Purpose of HFSS policy

The policy details guidance relating to restrictions of High Fat, Salt, or Sugar (HFSS) products and requirements for advertising or sponsorship approvals.

General Principles: The Nutrient Profiling Model

The UK Nutrient Profiling Model (NPM) has been identified as the best way of identifying food that is high in fat, salt, or sugar. It has been subject to rigorous scientific scrutiny, extensive consultation, and review. It is supported by the independent Scientific Advisory Committee on Nutrition (SACN) and a wide range of nutrition experts. The scoring system it uses balances the contribution made by beneficial nutrients important in children's diets with food components that children should eat less of.

Guidance on how to identify whether a product is considered HFSS under the NPM is available [here](#).

Exceptions

In rare situations, an exception will allow a product not thought to make a substantial contribution to childhood obesity although deemed unsuitable by the NPM to be approved for advertising (for example Olive Oil).

Content featuring only non HFSS products

This is approved, unless existing restrictions on advertising apply, for example:

Current guidance

Advertisements for alcoholic drinks should not feature in promotions directed at people under 18. Advertising for alcoholic beverages should not be sited within 100 meters of any school.

Existing restrictions include adverts for fast food takeaways within 100 metres of a school.

Content featuring only HFSS products

Where a proposed advertisement features only food and/or non-alcoholic drink, which is rated HFSS, such advert would be rejected.

Content featuring a range of food and/or drink products, some of which is HFSS

The advertising or promotion of HFSS products is unacceptable under the policy, so a range or meal could not feature them (e.g., individual items could only be advertised if all individual products were non-HFSS). This would also apply to any meal or eating settings being shown, including those for restaurants, aggregator platforms and delivery services.

Content featuring no food or drink directly, but the advertisement is from (or features) a food/drink brand:

This includes:

- Advertisements where the brand's logo is included but no products, such as a brand values campaign (e.g., *X brand which is well known for fast food, or a high energy drink has a prominent advertisement without showing any food or drink*).
- Directional signage to a store, app, or website
- Promotional advertising which is price-led but features no products, e.g., "50% off everything"
- Advertising about a business or its performance
- Slides delivered by a sponsor at an event sponsored by a food or drink brand products) as the basis of the advert

Food and drink brands (including food and drink service companies or ordering services) will only be able to place such advertisements if it promotes healthier options (i.e., non-HFSS products) as the basis of the copy.

Where advertisers and/or sponsors or advertising space contract holders are uncertain about the classification of proposed copy under these guidelines, they should discuss this with the council through the council's the communications team.

Advertisements or other content where food and drink are shown 'incidentally' i.e., it is not the subject of the advertisement but is included (or implied) by visual or copy

HFSS products should not be promoted by being featured in advertisements for other products. It is the responsibility of advertisers and/or sponsors and their agents to verify the HFSS status of featured products using the [NPM](#)

Advertisements or other content where food and drink are referenced in the text, or through graphical representations or other visual representation contains indirect promotion of HFSS food and/or drink

HFSS products should not be promoted through textual references, graphic images, or other visual representations. Where a food or drink item is featured in this way and does not relate to a specific identifiable product which can be assessed for its HFSS status, copy may be rejected by the council on the basis that it promotes the consumption of HFSS foods.

Indirect promotion of HFSS food and/or drink

Where a product is non-HFSS but falls within a category covered by the Office for Health Improvement and Disparities (OHID - formerly PHE (Public Health England)) [recommendations for sugar and calorie reduction](#), the product should always carry a prominent product descriptor to help differentiate it from non-compliant products (e.g. an advertisement featuring a non-HFSS burger or ice cream should include prominent text that accompanies the image naming the specific product and retailer). It is the responsibility of the advertiser and/or sponsor to determine whether products fall into a category covered by the OHID recommendations for sugar and calorie reduction.

Children should not usually be shown in advertisements for products which are compliant in a category which is covered by OHID's recommendations for sugar or calorie reduction.

Portion sizes: The NPM model is based on nutrients per 100g of a product, rather than recommended portion size. Advertisers should always ensure that they promote products in portion sizes which encourage healthy eating. For products that are non-HFSS but fall within a category covered by PHE's recommendations for sugar or calorie reduction, the product should be displayed as a single portion.

If advertisers, sponsors, and/or agencies are unsure about how to interpret this, or any other aspect of these guidelines, they are encouraged to contact the council or its agents and work together on a solution to avoid submitted copy requiring changes or being rejected.

Example decision table:

Advertising Content	Examples	Outcome	Notes

Only non HFSS products advertised	Fruit and vegetables, low sugar- wholegrain cereal	☐ APPROVE	Subject is compliant with HFSS policy
Only HFSS products	Deep fried chicken burger with mayonnaise, large fries, high-sugar drinks, and ice cream	☒ REJECT	Subject is not compliant with HFSS policy – advertiser can promote healthier product such as grilled chicken wrap with fresh vegetables, water and fruit and include the name of the business.
A range of products some of which are HFSS	An advertisement that features a shopping basket with fruit, vegetables, ice cream and high sugar drinks	☒ REJECT	All food and drink items must be HFSS compliant – Instead, the shopping basket could contain e.g., fresh fruit, vegetables, a loaf of bread, lentils, a yoghurt, and water and include the name of the retailer.
No food or drink directly displayed but the advertisement is from (or features) a	A fast-food business promoting non-HFSS products such as fruit, vegetables, water, low sugar drink etc. (APPROVED) A fast-food business promoting a HFSS product	☐ POSSIBLY APPROVE (Depends on product featured)	

food/drink brand	such as high sugar ice cream and drink (REJECTED)		
Food and/or drink is shown 'incidentally' as part of an advert	A financial services advertisement, featuring a beach with ice cream (REJECTED) A financial services advertisement, featuring a beach with fruit (APPROVED)	□ POSSIBLY APPROVE (Depends on product featured)	
Food and drink are referenced in the text, through graphical representations or other visual representation (not a real product being advertised)	A cartoon image of a banana (APPROVED) A cartoon image of a milk chocolate bar (REJECTED)	□ POSSIBLY APPROVE (Depends on product featured)	If the advertisement can be reasonably considered to promote HFSS products it will be rejected regardless of whether the food is an actual product.
Indirect promotion of HFSS food and/or drink	A non-HFSS soft drink with a prominent text that accompanies the image naming the specific product/retailer. (APPROVED) A non-HFSS soft drink without a prominent text that accompanies the image naming the specific product/retailer. (REJECTED)	□ POSSIBLY APPROVE (Only if prominent text accompanies the image naming the product and retailer)	A prominent product descriptor helps to differentiate it from non-compliant products. This is necessary where the product falls into a category typically associated with HFSS products (such as soft drinks).

General Equality Impact Assessment (EIA) Form

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:	BHCC Advertising and Sponsorship Policy
Directorate:	
Service:	People and Innovation
Team:	Communications and Marketing
Is this a new or existing activity?	New policy
Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)	No

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

Responsible Lead Officer:	Katie Read, Business Improvement Manager
Accountable Manager:	Natalie Orringe, Head of Strategic Communications
Additional stakeholders collaborating or contributing to this assessment:	

3. About the activity

Briefly describe the purpose of the activity being assessed:

The policy establishes a council-wide framework for seeking, assessing, accepting, refusing, managing and withdrawing advertising, sponsorship and brand activation on council-owned or council-managed assets. It is intended to generate sustainable income and public benefit while protecting public health, children and vulnerable people, equality, the environment, the public realm and the Council's reputation. It prohibits discriminatory or offensive content and specified harmful categories, restricts other higher-risk categories, applies High Fat, Salt and Sugars (HFSS) controls, and introduces proportionate due diligence, approval and review arrangements.

What are the desired outcomes of the activity?

• Consistent, transparent and evidence-based decisions across council services. • Responsible commercial income for reinvestment in services aligned with Council Plan priorities. • Reduced exposure on council-controlled assets to harmful, exploitative, misleading, discriminatory or inappropriate advertising. • Stronger protection for children, vulnerable adults and communities experiencing health or socio-economic inequalities. • Inclusive, accessible and socially responsible advertising, sponsorship and brand activation. • Clear accountability, complaints handling, and monitoring.

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

Residents, visitors, workers and students who see advertising on council-controlled assets; children and young people; disabled people; older people; Black and Racially Minoritised communities; faith communities; women; LGBTQ+ and TNBI residents; pregnant people and families; migrants, refugees and people with limited English or literacy; carers; care-experienced people; people experiencing poverty, debt, homelessness, addiction, gambling-related harm, domestic abuse or other vulnerability; local businesses, charities, community organisations, advertisers, sponsors, agencies, council staff and contractors.

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.

Policy development has included cross-service engagement covering Communications and Marketing, Commercial, Public Health, Legal, Finance, Procurement, Planning, Transport/Highways and operational services. Feedback has strengthened prohibited and restricted categories, HFSS controls, public-health safeguards, climate considerations, governance and escalation.

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	NO – no routine person-level equality data is currently collected for exposure to advertising. Complaints, decisions, placements and engagement will be monitored.
Disability and inclusive adjustments, coverage under equality act and not	NO – as above.
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	NO – as above.
Religion, Belief, Spirituality, Faith, or Atheism	NO – as above.
Sex	NO – as above.
Gender (including non-binary and Intersex people)	NO – as above.
Gender Reassignment	NO – as above.
Sexual Orientation	NO – as above.
Marriage and Civil Partnership	NOT APPLICABLE for routine monitoring; review if a proposal or complaint identifies a specific impact.
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	NO – no routine person-level equality data is currently collected for exposure to advertising. Complaints, decisions, placements and engagement will be monitored.

Armed Forces Personnel, their families, and Veterans	NOT APPLICABLE for routine monitoring; review if a proposal or complaint identifies a specific impact.
Expatriates, Migrants, Asylum Seekers, and Refugees	NO – no routine person-level equality data is currently collected for exposure to advertising. Complaints, decisions, placements and engagement will be monitored.
Carers	NO – as above.
Looked after children, Care Leavers, Care and fostering experienced people	NO – as above.
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	NO – as above.
Socio-economic Disadvantage	NO – as above.
Homelessness and associated risk and vulnerability	NO – as above.
Human Rights	NO – as above.
Another relevant group (please specify here and add additional rows as needed)	NO – as above.

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?

A proportionate monitoring framework will be implemented rather than attempting to collect personal data from everyone exposed to public advertising.

Records of asset/location, audience context, product category, approval conditions, equality/public-health considerations, complaints and outcomes will be maintained.

Equality questions will be included in consultation and complaints pathways where appropriate.

Existing JSNA, Census, Health Counts, service data and community insight will be used to inform the assessment of advertising, sponsorship and brand activation placement.

Targeted engagement will be undertaken where a proposal could affect a particular group.

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

The Head of Strategic Communications will oversee implementation. A central decision and complaints log will be reviewed at least quarterly during the first year and then at an interval agreed through the

annual policy review. Monitoring will cover prohibited/restricted proposals, conditions imposed, location and audience, complaints by theme, upheld concerns, withdrawals, accessibility issues, HFSS compliance and evidence of public benefit will be included in the monitoring. Significant or recurring equality concerns will trigger corrective action. The EIA will be formally reviewed alongside the policy annually, or sooner following legal, public-health or strategic change.

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.

Positive: Children and young people should benefit most from restrictions on gambling, harmful addictive substances, exploitative finance, inappropriate content and HFSS advertising, and from the policy requirement to protect children and vulnerable groups. Brighton & Hove has a comparatively young adult profile: the 2025 JSNA estimates 27% of residents are aged 19–33, compared with 17% in the South East and 19% in England. The policy therefore has particular relevance to young adults as well as children.

Negative: Older people and young people may experience repeated exposure differently; digital or experiential activations may exclude people with lower digital confidence or age-related access needs. Age-gating and placement controls could be inconsistently applied.

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.

Positive: Prohibiting discriminatory content and requiring inclusion and accessibility reduces the risk of harmful representation. Restrictions on exploitative finance, gambling and harmful products may particularly benefit disabled people who also experience poverty, poor health or vulnerability.

Negative: Digital screens, moving/flashing content and light splay, audio, street clutter, poorly positioned activation equipment, inaccessible information and sensory overload could create barriers for people with visual, hearing, mobility, cognitive, learning or neurodivergent access needs.

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).

Applying accessible creative and activation standards through the policy and agreed contract terms, e.g. step-free and obstruction-free layouts; accessible viewing/participation; adequate contrast and readable type; captions/transcripts where audio/video is used; alt text for digital content; plain English; non-digital alternatives; avoidance or careful control of flashing, rapid movement, and excessive brightness and sound. Specialist review where a proposal presents material sensory, mobility or communication risks.

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.

Positive: The policy bars discriminatory or offensive content and requires advertising to uphold equality, diversity and inclusion. This can reduce racist stereotyping, hate speech and exclusion and can support responsible campaigns reflecting the city's communities.

Negative: Creative content may reproduce racial stereotypes, cultural appropriation or tokenism. Automated audience targeting or placement choices may exclude communities. English-only activations can disadvantage some residents, including Gypsy, Roma and Traveller people, migrants and refugees.

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

Does your analysis indicate a disproportionate impact relating to Religion, Belief, Spirituality, Faith, or Atheism?	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.

Positive: Prohibiting discrimination and offensive content supports freedom of religion or belief and protects residents from derogatory portrayals.

Negative: Advertising may stereotype faith groups, use sacred imagery inappropriately, promote hostility, or conflict with religious observance through timing, location or content. Conversely, over-cautious decisions could unnecessarily restrict lawful expression.

6.5 Sex:

Does your analysis indicate a disproportionate impact relating to Sex ?	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.

Positive: Restrictions on discriminatory, offensive, exploitative and harmful material can reduce sexist stereotyping and objectification. Controls on exploitative finance, gambling and alcohol may benefit women experiencing poverty, abuse or caring pressures.

Negative: Content may sexualise or objectify women, reinforce gender stereotypes, normalise violence, or use body-image and cosmetic claims that adversely affect women and girls.

6.6 Gender and Gender Reassignment:

Does your analysis indicate a disproportionate impact relating to Gender Identity (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.

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

Positive: The policy's non-discrimination requirement and exception for equality-related communications can support inclusive representation of women, men, non-binary and intersex people, and prevent transphobic content.

Negative: Adverts with binary-only language, stereotyped roles, exclusionary facilities at activations or hostile public reaction may create disadvantage.

6.7 Sexual Orientation:

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

Positive: The policy reduces risk of homophobic or biphobic content and allows equality-related campaigns. Inclusive campaigns can improve visibility and belonging in Brighton & Hove, where we have a significant LGBTQ+ population.

Negative: Stereotyping, tokenism, exclusion or hostile responses may cause harm. Increased commercial use of established major events such as Pride may create reputational or community concern.

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 specific disproportionate impact has been identified at policy level. The non-discrimination requirement applies. Sponsorship or campaign proposals connected to relationship or family services should will assessed case by case basis.

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

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

Positive: Responsible content standards can support respectful representation of pregnancy, parenthood, adoption, infertility and menopause and prevent discriminatory messaging.
 Negative: Advertising may reinforce stereotype, make misleading health claims, or exclude pregnant people and parents from physical activations. Alcohol placement is also relevant where audiences may include pregnant people.

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 specific disproportionate impact has been identified for Armed Forces personnel, families or veterans at policy level. General safeguards on exploitation, mental health, addiction, gambling and financial harm remain relevant. Individual campaigns and locations will be reviewed where evidence indicates a particular veteran impact.

6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

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

Positive: Controls on exploitative finance, misinformation, offensive content and discrimination can protect people new to the UK and those facing language or immigration-related vulnerability.

Negative: English-only information, culturally specific messages, stereotypes or unclear sponsorship/endorsement may disadvantage migrants, refugees and asylum seekers.

6.12 [Carers](#):

Does your analysis indicate a disproportionate impact relating to [Carers](#) (Especially considering for age, ethnicity, language, and various intersections).

YES

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

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

Positive: Restricting harmful and exploitative products may benefit carers and the people they support, especially where disability, age or low income intersect.

Negative: Activations at fixed times or inaccessible venues and complex information may exclude unpaid carers.

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.

Positive: Children in care and care leavers may benefit from stronger safeguards against gambling, exploitative finance, harmful substances and HFSS product content. The policy can support the Council's corporate-parenting responsibility by applying heightened care to young audiences.

Negative: Stigmatising portrayals, data capture during activations, or offers that encourage debt or risky consumption could cause harm.

6.14 Homelessness:

Does your analysis indicate a disproportionate impact relating to people experiencing homelessness, and associated risk

YES

and vulnerability? (Especially considering for age, veteran, ethnicity, language, and various intersections)

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.

Positive: Prohibitions on exploitative financial products, gambling and harmful substances address products capable of aggravating financial, addiction and health harms experienced by people who are homeless or at risk of homelessness.

Negative: Potential hostile or stigmatising imagery and exclusion from public space during activations.

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

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

YES

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

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

Positive: The prohibition of offensive, violent and socially harmful content and controls on exploitative sectors can reduce exposure to triggering or coercive messages.

Negative: Potential for imagery or experiential activity to have themes of violence, control, sexualisation, alcohol or financial dependency which may retraumatise survivors or compromise privacy/safety.

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.

Positive: The strongest anticipated benefit is for residents experiencing poverty or financial insecurity. The policy prohibits payday loans/exploitative finance and gambling, restricts alcohol and HFSS advertising, and requires public benefit.

Negative: Advertising may be concentrated in high-footfall or deprived areas; some sponsorship could commercialise essential services or create perceived endorsement. Small/local organisations could face access barriers if opportunities are packaged only for large brands.

6.17 Human Rights:

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

Positive: The policy supports dignity, non-discrimination, protection from harmful messaging, lawful expression and transparent decision-making.

Negative: Refusal of advertising may limit freedom of expression, while acceptance can affect privacy, family life, freedom of thought/religion and non-discrimination. Brand activations may also capture images or personal data.

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

The policy is likely to produce cumulative positive impacts for people who experience several overlapping inequalities, for example a disabled young person living in a deprived area, an older migrant with limited English, an LGBTQ+ care leaver, or a woman experiencing domestic abuse and debt. These groups may otherwise face greater exposure or susceptibility to exploitative finance, gambling, alcohol, HFSS, discriminatory or misleading content.

Cumulative risks arise if higher-risk advertising is geographically concentrated; if decisions consider one characteristic at a time; if public spaces become cluttered or physically inaccessible; if digital-only interaction excludes people; or if commercial income is prioritised over dignity, safeguarding and public benefit.

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. Ensure equality and accessibility are key elements of an assessment checklist for approval decisions on advertising, sponsorship and brand activations. The assessment will explicitly consider equality, accessibility, placement and likely audience, including any potential disproportionate or cumulative impacts.

Owner: Head of Strategic Communications, supported by EDI, Public Health and Legal.

2. Establish a central advertising and sponsorship decision, placement and complaints log. Recording category, location, audience, restrictions/conditions, equality issues, complaints and outcome.

Owner: Marketing & Communications.

3. Introduce accessible creative and brand-activation requirements in guidance and contract terms.

Owner: Marketing & Communications with Procurement/Legal.

4. Monitor geographic and cumulative exposure to restricted categories, mapping placements against schools/youth settings and deprivation where data is available.

Owner: Marketing & Communications with Public Health.

Actions 1 to 3 will be incorporated into implementation arrangements before relevant advertising and sponsorship activity commences. Geographic and cumulative exposure under Action 4 will be monitored during the first year and considered through the annual policy and EIA review. The approval framework should therefore consider place, audience, product, creative treatment, frequency, cumulative exposure and intersections together, rather than assessing the advert in isolation.

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 will be transferred to the Advertising and Sponsorship Policy implementation plan and relevant contract/procurement mobilisation plans. Progress will be considered through quarterly implementation monitoring and the annual policy/EIA review.

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:

Not applicable.

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

The assessment identifies overall positive equality and public-health impacts from a consistent council-wide policy that prohibits discriminatory and harmful content, restricts higher-risk categories, controls HFSS advertising and protects children and vulnerable people. Potential adverse impacts relate mainly to unequal geographic exposure, inaccessible formats or activations, stereotyping in advertising content, digital exclusion, privacy and inconsistent decision-making. These impacts are capable of mitigation through an equality/accessibility checklist, accessible standards, transparent reasoned decisions, placement monitoring, complaints analysis and annual review.

9. Publication

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

The EIA should be published alongside the final policy and Cabinet report once approved by the EDI Team. No reason for non-publication has been identified. Personal data from consultation or complaints must be anonymised and not included.

10. Directorate and Service Approval

Signatory:	Name and Job Title:	Date: DD-MMM-YY
Responsible Lead Officer:	Katie Read, Business Improvement Manager	18 September 2026
Accountable Manager:	Natalie Orringe, Head of Strategic Communications	29 September 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:	Eric Page	29 September 2026
EDI Manager:		

Notes and recommendations from EDI Business Partner reviewing this assessment:

Comments added for reflection and consideration /remove when updated
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Notes and recommendations (if any) from EDI Manager reviewing this assessment:

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Brighton & Hove City Council

Cabinet

Agenda Item 58

Subject: Black Rock Future Vision and Meanwhile Use

Date of meeting: Thursday, 15 October 2026

Report of: Cabinet Member for Finance and City Regeneration

Lead Officer: Corporate Director, City Operations

Contact Officer: Howard Barden, Head of Culture & Events
Jack Cregan, Commercial Executive

Email: Howard.Barden@brighton-hove.gov.uk
Jack.Cregan@brighton-hove.gov.uk

Ward(s) affected: Kemptown;

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 Black Rock is one of the city's most strategically important regeneration opportunities, offering significant potential to drive economic growth, improve health and wellbeing, enhance community facilities and support the long-term renewal of the eastern seafront. The Council's vision is to transform the site over time into a landmark coastal destination centered on culture, leisure and recreation, supported by complementary commercial, environmental and community uses. This ambition supports the priorities of the Council Plan and the wider objectives set out within the Brighton & Hove Seafront Prospectus.
- 1.2 Central to that vision is an ambition to create a nationally and internationally recognised cultural destination, including a major visual arts offer, with work already underway to explore potential gallery partnerships, investment opportunities and future funding streams. Any meanwhile use must therefore remain flexible and capable of adapting to, and supporting, this longer-term transformation of the site.
- 1.3 The Council is pursuing a phased approach to Black Rock. The first phase is the delivery of a meanwhile use capable of activating the site, generating income and creating community benefit whilst maintaining flexibility for future redevelopment. The second phase is the long-term redevelopment and

transformation of the site through future investment and regeneration opportunities.

- 1.4 To support delivery of the first phase, the Council undertook an Expressions of Interest process to identify proposals capable of delivering a meanwhile use for the site. This report sets out the outcome of that process and seeks approval to progress negotiations with a preferred bidder whilst retaining a reserve bidder should satisfactory terms not be capable of being concluded.

2. Recommendations

- 2.1 Cabinet notes and endorses the Black Rock Future Vision and approves the Council's phased approach to site activation and long-term regeneration.
- 2.2 Cabinet approves Bidder 1 identified in the part 2 report as the Council's preferred bidder for the Black Rock meanwhile-use opportunity, subject to satisfactory completion of due diligence and the negotiation of acceptable commercial, legal and operational terms.
- 2.3 Cabinet approves Bidder 2 identified in the Part 2 report as reserve bidder should satisfactory terms not be capable of being concluded with Bidder 1.
- 2.4 Cabinet delegates authority to the Corporate Director City Operations to, in consultation with the relevant Cabinet Member, to:
 - a) undertake all necessary due diligence;
 - b) negotiate and finalise Heads of Terms;
 - c) enter into all lease agreements and ancillary legal documentation necessary to implement the recommendations contained within this report.
- 2.5 Cabinet agrees that any lease agreement should:
 - be limited to a maximum five-year term;
 - contain appropriate break and termination provisions;
 - require removal of tenant infrastructure at lease expiry;
 - require the site to be returned in a condition substantially equivalent to that existing immediately prior to occupation, at the operator's expense, unless otherwise agreed by the Council;
 - include agreed social value commitments and monitoring arrangements.

3. Context and background information

- 3.1 Black Rock occupies a prominent position on the eastern seafront between Brighton Marina, Madeira Drive and neighbouring communities including Whitehawk and Kemptown. The site is recognised as one of the city's most significant strategic assets and has long been identified as having the potential to contribute towards regeneration, economic growth, leisure, community wellbeing and visitor economy objectives.

- 3.2 Whilst consideration of the long-term future of the site continues, the Council identified an opportunity to bring Black Rock into productive interim use through a meanwhile-use programme. The Council's objectives were to support activation of the site, create community benefit, attract visitors, generate income and improve perceptions of place whilst preserving future development options.
- 3.3 The Council's long-term position is set out most recently in the Brighton & Hove Seafront Prospectus, published in June 2026. The Prospectus identifies Black Rock as a key seafront investment opportunity and describes a two-stage approach: first, meanwhile activation through temporary venues, outdoor spaces and community events; and second, longer-term transformation as a landmark destination making full use of the site's coastal location and improved connectivity.
- 3.4 The Prospectus does not prescribe a fixed scheme. It envisages that the permanent development could accommodate major cultural or commercial uses, potentially including a gallery, within a wider leisure and recreation-led destination. This sits within the City Plan strategic allocation for leisure and recreation-led development, supported by uses which strengthen cultural, environmental and community value.
- 3.5 The Council has invested approximately £18m in enabling works to prepare the site for future development and improve the wider eastern seafront. These works include land remediation and levelling, utility diversions, a realigned and extended sea wall and improved coastal defences, the 800m seafront boardwalk, improved pedestrian and cycle connections to Brighton Marina, and refurbishment of the Volk's Electric Railway station and public toilets. Together, these interventions have reduced constraints, improved access and established a more robust platform for permanent redevelopment.
- 3.6 The long-term approach to Black Rock forms part of the Council's wider, place-led vision for the full 13km seafront. That vision seeks high-quality placemaking, stronger access and active travel, investment in maintenance, environmental resilience and heritage, and sustainable commercial activation aligned with public benefit. Black Rock is also expected to complement the restoration of Madeira Terrace, the eastern seafront public realm and connections with Brighton Marina and neighbouring communities.
- 3.7 As part of this wider vision, the Council is exploring the potential for Black Rock to accommodate a cultural destination of national and international significance, potentially including a major visual arts gallery capable of attracting significant exhibitions, partnerships and audiences. Such an offer could build on Brighton & Hove's established creative identity, strengthen the city's cultural infrastructure and act as a catalyst for regeneration, learning, skills and economic activity. The form, scale, deliverability and funding of any permanent cultural offer remain subject to further feasibility work, partnership development, business case preparation and future decision-making

- 3.8 While this remains the long-term aspiration, significant preparatory work is already underway. The Council and its partners have begun exploring opportunities with nationally and internationally recognised gallery operators and cultural organisations, alongside engagement with higher education institutions, museums, creative industry partners and potential investors. This work is helping to test the concept, understand delivery models and identify the partnerships required to develop a financially sustainable and culturally ambitious proposition.
- 3.9 In parallel, officers are actively exploring potential funding routes and investment opportunities. Early discussions have included consideration of Arts Council England programmes, National Lottery funding, philanthropic giving, sponsorship, commercial investment and central government support. The intention is to develop a robust business case and investment proposition that can attract a blend of public and private funding, ensuring that any future gallery is delivered on a sustainable basis and maximises benefits for residents, visitors and the wider creative economy.
- 3.10 The Council also recognises the importance of maintaining momentum while the long-term vision is developed. Opportunities are therefore being explored to bring nationally significant gallery programming and exhibitions to the city in advance of any permanent facility, helping to build audiences, strengthen partnerships, raise the city's profile and demonstrate the demand for a major visual arts destination. This phased approach will help position Brighton & Hove as a leading centre for visual arts whilst laying the foundations for a future cultural institution of national and international standing.
- 3.11 Accordingly, the recommended meanwhile use should be treated as an interim stage in delivering the Council's established strategic direction. It should animate the site, generate income, build audiences and test demand and accessibility, but must not create an expectation of permanent occupation or fetter future decisions on the form, procurement, planning or delivery of the long-term development.
- 3.12 An Expressions of Interest process was therefore undertaken. Four submissions were received. To protect the Council's commercial position during negotiations, the submissions are referred to in this public report as Bidder 1, Bidder 2, Bidder 3 and Bidder 4. The bidder identities are set out in the exempt Part Two report.
- 3.13 Submissions were evaluated against the published criteria and weightings:

Evaluation criterion	Weighting
Operational Plan & Provider History	40%
Local Economic Impact	20%
Rent Offer	40%

4. Assessment outcomes

- 4.1 Four submissions were received and assessed against the published evaluation criteria. Officers undertook a comparative assessment of each submission against the published criteria.
- 4.2 The assessment identified Bidder 1 as the highest scoring proposal and Bidder 2 as the second highest scoring proposal. Officers concluded that these submissions most closely aligned with the objectives of the meanwhile-use opportunity.
- 4.3 Bidder 1 proposes a temporary active leisure, sport and wellbeing destination incorporating padel, fitness, food and beverage facilities and mental health programming. The proposal includes a fixed annual rent and does not require a Council capital contribution.
- 4.4 The social value proposition is an important component of the recommended bid. By combining accessible opportunities for physical activity with dedicated mental health programming, the proposal has the potential to support prevention and early intervention, reduce barriers to participation and create regular opportunities for social connection. The visible seafront location also provides an opportunity to normalise conversations about mental health and connect participants with appropriate community and wellbeing support.
- 4.5 Bidder 1's proposal also has the potential to generate wider community and economic value through local employment, volunteering, coaching, training and work-experience opportunities; partnerships with schools, colleges, community groups and health and wellbeing organisations; and activity targeted at residents who experience financial, social or health-related barriers to participation. These potential benefits will need to be translated into specific, costed and deliverable commitments through the due diligence and Heads of Terms process.
- 4.6 Bidder 2 proposes a cultural, leisure and placemaking destination incorporating a public beach hub, community facilities, food and beverage uses and event space. The proposal demonstrated significant operator experience and a substantial level of proposed private investment. Bidder 3 and Bidder 4 presented alternative proposals which were considered as part of the assessment process. Whilst both demonstrated positive attributes, officers concluded that they did not represent the strongest overall options when assessed against the published meanwhile-use criteria.
- 4.7 Detailed bidder identities, commercial terms, financial offers, proposed lease structures and evaluation information are contained within the exempt Part Two report where disclosure could prejudice ongoing negotiations and the Council's commercial position.

5. Analysis and consideration of options

- 5.1 Four Expressions of Interest were assessed against the published evaluation criteria of Operational Plan and Provider History (40%), Local Economic Impact (20%) and Rent Offer (40%). Detailed scoring and comparative commercial analysis are set out in the exempt Part Two report.
- 5.2 **Preferred Option:**
The recommended option is to appoint Bidder 1 as preferred bidder. Officers concluded that the proposal offered the strongest overall combination of deliverability, financial return and community benefit whilst meeting the objectives established for the meanwhile-use opportunity. The proposal achieved the highest overall assessment outcome and is supported by an experienced delivery partner. In social value terms, it offers an opportunity to use sport as a route into improved physical and mental wellbeing, stronger social connections and wider participation. It also provides a platform for partnership working with local communities and services, and for creating employment, skills and volunteering pathways linked to the operation of the site.
- 5.3 To ensure that these benefits are realised and can be evidenced, officers will seek an agreed social value framework before completion of the lease agreement. This should establish baseline information, target groups, measurable outputs and outcomes, delivery partners, reporting frequency and appropriate review arrangements. Measures should include, where achievable, affordable or free access, participation by under-represented groups, delivery of mental health and wellbeing activity, local employment and training outcomes, community partnerships and participant feedback.
- 5.4 **Reserve Option:**
Bidder 2 is recommended as reserve bidder. Officers recognised significant strengths in the proposal's cultural offer, placemaking ambitions, investment proposition and operator experience. However, the proposal generated a lower and less certain financial return than the preferred bidder and therefore did not achieve the highest overall assessment outcome.
- 5.5 **Alternative Proposals Considered:**
Bidder 3 presented a credible and deliverable active leisure offer and demonstrated positive community benefits. However, officers concluded that the proposal offered a narrower range of economic and community impacts and a lower financial return than the preferred and reserve proposals.
- 5.6 Bidder 4 proposed a broader regeneration vision centred upon a long-term occupation model rather than a temporary meanwhile use. Officers recognised the potential merits of that approach. However, it was not directly comparable with the objectives of the current Expressions of Interest process and would require separate strategic, legal, property, procurement and financial consideration should the Council wish to explore longer-term redevelopment opportunities for Black Rock in the future. Progressing the recommendations contained within this report does not

prevent the Council from considering such opportunities through separate governance arrangements at a later date.

- 5.7 Having considered all submissions against the published criteria, officers concluded that Bidder 1 represents the most advantageous proposal for the purposes of the meanwhile-use opportunity. It achieves the strongest overall balance of financial return, deliverability and public benefit whilst supporting activation of the site and maintaining flexibility over the long-term future of Black Rock. Officers therefore recommend its appointment as preferred bidder, with Bidder 2 retained as reserve bidder should satisfactory terms not be concluded. The temporary and relocatable nature of the proposal, together with suitable termination, reinstatement and handback provisions, is important to ensuring compatibility with the Council's two-stage approach for Black Rock.

6. Community Engagement and Consultation

- 6.1 The Council undertook an Expressions of Interest process to test market interest in delivering a meanwhile use at Black Rock. The process attracted four submissions from organisations operating across the leisure, cultural, community and regeneration sectors. Officers assessed submissions against the published evaluation criteria.
- 6.2 As proposals progress, further engagement will take place with ward councillors, local stakeholders, statutory consultees and relevant Council services through planning, licensing and operational approval processes as required. Engagement will include early discussion with neighbouring communities, including Whitehawk and East Brighton, and with organisations working in physical activity, mental health, youth provision, disability and inclusion. This will help shape an offer that responds to local need and identifies credible referral and delivery partnerships.

7. Financial implications

- 7.1 The recommended proposal is expected to generate a fixed annual rental income for the Council over a 5 year period and does not require a Council capital investment.
- 7.2 Final financial implications will depend on the outcome of due diligence and negotiation of Heads of Terms, including the agreed rent, payment profile, responsibilities for site preparation, utilities, maintenance, insurance, business rates, reinstatement and handback.
- 7.3 The Council will need to ensure that the agreement protects it from avoidable costs, liabilities or compensation exposure and does not prejudice the future redevelopment of Black Rock.
- 7.4 Financial due diligence will be undertaken before completion of any legal agreement, including assessment of the operator's financial standing,

deliverability of the proposed investment and any security, guarantee or rent deposit requirements.

- 7.5 Any agreed income will be reflected against the Income & Commercialisation transformation programme included within the councils MTFS. Due to the timing of the agreement being signed it is unlikely that this income will be received in 2026/27, should it be then it will contribute towards the councils in year financial position.

Name of finance officer consulted: Craig Garoghan Date consulted:11/09/2026

8. Legal implications

- 8.1 The Council has the power to enter into the arrangements proposed by this report pursuant to section 123 of the Local Government Act 1972 which permits the Council to dispose of land for the term as set out in the report via way of a lease. The Council may also rely on section 1 of the Localism Act 2011 which allows the Council to do anything that an individual may do subject to any statutory constraints on the Council's powers.

Name of lawyer consulted:Siobhan Fry Date consulted:25/09/2026

9. Risk implications

- 9.1 The principal risks associated with the proposal are:
- Delivery risk
 - Commercial and financial risk
 - Planning and statutory approvals risk
 - Reinstatement and end-of-term obligations
 - Operational management risk
 - Reputational risk
 - Strategic opportunity risk
- 9.2 These risks will be managed through due diligence, contractual protections, financial assessment and appropriate governance arrangements before any agreement is completed. In particular, the legal agreement will need to protect the Council's ability to obtain vacant possession and progress long-term redevelopment without avoidable delay, compensation exposure or constraints arising from the meanwhile operator's occupation or investment.

10. Equalities implications

- 10.1 In reaching any final agreement, the Council will have due regard to its obligations under the Equality Act 2010. Officers will seek to secure appropriate accessibility, inclusion and community benefit commitments through the Heads of Terms and subsequent lease agreements. Particular consideration will be given to accessibility of the site, activities and facilities for disabled residents and visitors. The social value plan should also identify practical steps to widen participation among groups

who are less likely to access organised sport or who face cost, confidence, cultural, physical or other barriers. This should include consideration of accessible facilities and equipment, inclusive programming, affordable access, targeted outreach and appropriate safeguarding arrangements.

11. Sustainability implications

- 11.1 The proposals include varying levels of temporary, modular and relocatable infrastructure. Sustainability considerations will be reviewed through detailed design, planning and due diligence processes. Opportunities to reduce carbon impacts and promote sustainable travel will be explored through the detailed design and planning stages.

12. Health and Wellbeing Implications:

- 12.1 The recommended proposal places health, wellbeing, participation and mental health outcomes at the centre of its operating model and has the potential to contribute positively to the Council's wider health and wellbeing objectives. The combination of regular physical activity, structured mental health programming and opportunities for social interaction could contribute to improved wellbeing, reduced isolation and earlier engagement with support. These benefits will depend on the quality, accessibility and reach of the programme. Officers will therefore seek clear delivery arrangements, appropriate partnerships and proportionate outcome monitoring as part of the final agreement.

Other Implications

13. Procurement implications

- 13.1 The proposed arrangement relates to the grant of a lease of Council-owned land and is not a public contract for goods, works or services. Accordingly, the decision does not constitute a contract award and a contract award notice is not required. Procurement and legal advice has been sought regarding the appropriate governance route for the transaction.

14. Property Implications

- 14.1 The proposal involves the temporary use of a strategic Council asset ahead of its permanent redevelopment. Any lease agreement should be limited to a maximum of five years and contain suitable break, termination, reinstatement and handback provisions, controls over permanent works and change of use, and protections against security of tenure where legally appropriate. Any lease agreement will require the operator to remove infrastructure and return the site in a condition substantially equivalent to that existing immediately prior to occupation, at the operator's expense, unless otherwise agreed by the Council. The agreement must preserve vacant possession and avoid prejudice, delay or additional cost to the future development and regeneration of Black Rock.

15. Corporate and Council Plan Implications

- 15.1 The recommendations support the Council Plan priorities relating to inclusive economic growth, health and wellbeing, culture, sustainability, community participation and responsible stewardship of Council assets. The proposals support productive use of a significant strategic site whilst maintaining flexibility for future regeneration, cultural development and long-term placemaking aspirations at Black Rock.

16. Conclusion

- 16.1 The Expressions of Interest process has demonstrated strong market interest in Black Rock and has provided the Council with a range of credible options for bringing the site into productive use.
- 16.2 Officers have undertaken a detailed assessment of all submissions against the published evaluation criteria and have considered the relative merits, opportunities and risks associated with each proposal. Whilst all bids demonstrated positive features, the assessment concluded that Bidder 1 offered the strongest overall combination of deliverability, community benefit and financial return within the scope of the meanwhile-use opportunity.
- 16.3 The proposal delivers the highest guaranteed rental income to the Council, provides a clear and deliverable activation strategy for the site and supports health, wellbeing and participation objectives whilst preserving flexibility over the future strategic direction of Black Rock. Its social value contribution has the potential to extend beyond participation in sport, supporting confidence, social connection, mental wellbeing, skills development and routes into employment or volunteering. Securing measurable commitments through the Heads of Terms will enable the Council to assess delivery over the five-year term and ensure that community benefit remains integral to the operation rather than an ancillary element.
- 16.4 Officers therefore recommend that Cabinet approves Bidder 1 as the preferred bidder, subject to satisfactory due diligence and completion of the lease agreement, and that Bidder 2 be retained as reserve bidder should terms not be capable of being concluded with the preferred bidder.
- 16.5 This recommendation will enable the Council to secure activity, investment and income from the site in the short to medium term while progressing its established two-stage strategy for Black Rock. The first stage is meanwhile activation; the second is permanent transformation as a landmark, leisure and recreation-led destination with potential cultural, commercial, environmental and community uses. The recommendation does not predetermine the form of the permanent scheme or any future decision on planning, procurement, development, disposal or investment.

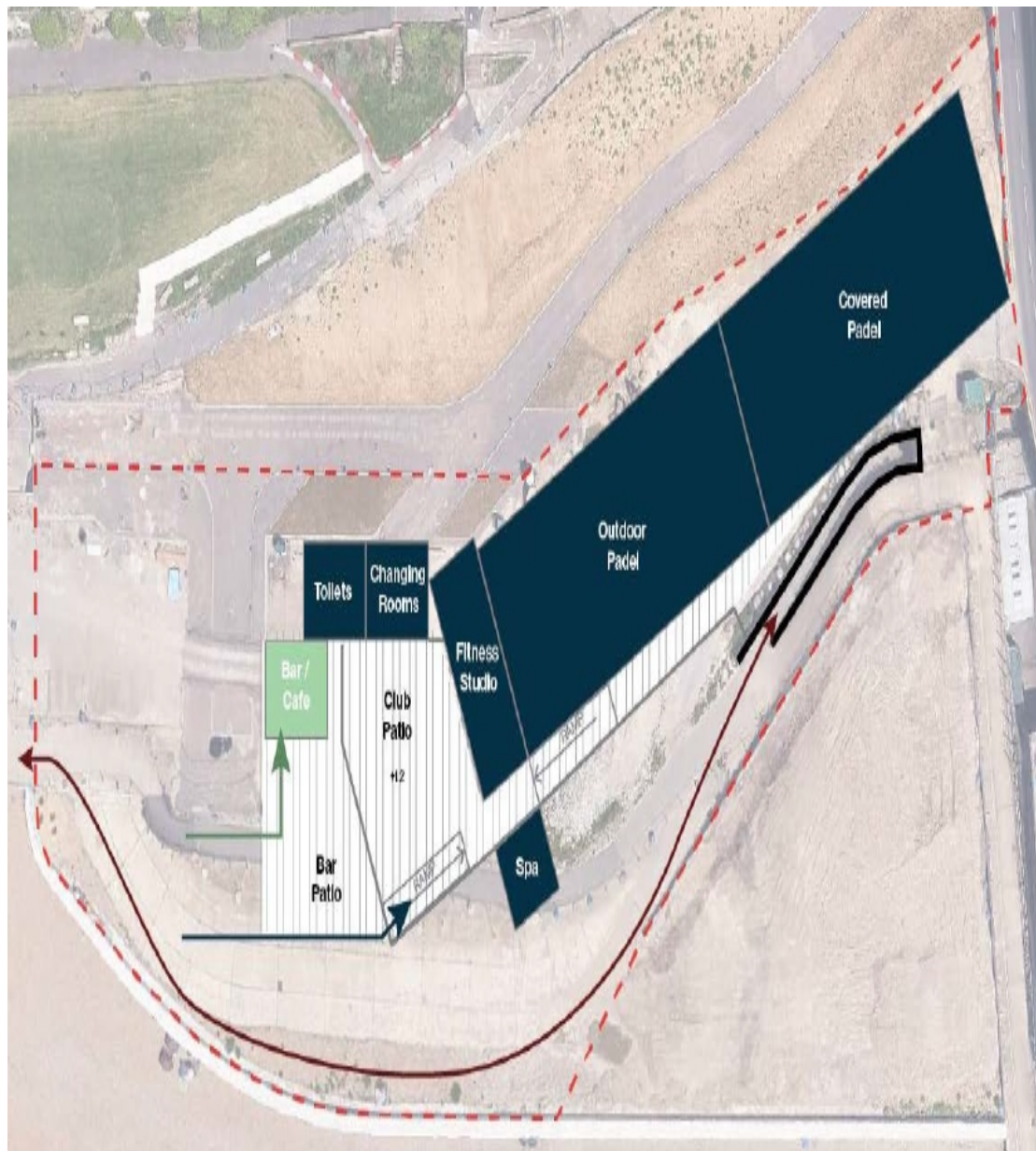
Supporting Documentation

1. Appendices

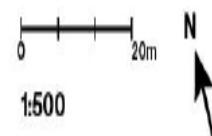
1. Black Rock Site Plan

2. Background documents

1. Brighton & Hove Seafront Prospectus: A Seafront Fit for the Future, published 5 June 2026
2. Policy & Resources Committee, Development Brief for Black Rock, 1 December 2022 (Agenda Item 82)
3. Brighton & Hove City Plan Part One, Policy DA2: Brighton Marina, Gas Works and Black Rock Area
4. Black Rock Site Enabling and Public Realm Works project information



Site Layout - Option 5
Maximise Sea views



Brighton & Hove City Council

Cabinet

Agenda Item 59

Subject: Streetlighting Contract Extension & Variation

Date of meeting: Thursday, 15th October 2026

Report of: Cabinet Member for Transport & City Infrastructure

Lead Officer: Corporate Director- Operations

Contact Officer: Tracy Beverley

Email: tracy.beverley@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 seeks Cabinet approval to delegate authority to the Corporate Director, City Operations, to enter into a Deed of Extension & Variation with Colas Limited to extend the Council's existing Street Lighting Contract for a period of 12 months, from 1 November 2026 to 31 October 2027 to allow sufficient time for re-procurement of a new contract commencing from 1 November 2027.
- 1.2 The Street Lighting contract enables the management and maintenance of our critical street lighting assets, supporting the delivery of the city's priorities; making it easier and safer to move around the city, supporting the delivery of active, safe and inclusive travel. It is essential in supporting the Nighttime economy and therefore Investing in our city while protecting our heritage assets – keeping Brighton unique. These are all key aspects in working to achieve our vision 'A City to Be Proud Of'. Furthermore, street lighting is known to reduce crime and support our most vulnerable people travelling around the city, including contributing to the safety of woman and girls, therefore streetlighting is essential in delivering our vision 'A Fair and Inclusive City'.
- 1.3 The extension is required to ensure continuity of these critical streetlighting assets, and to allow sufficient time to develop a new and improved £25m contract spanning 10 years. This new contract will learn from previous contracts, use the very best practice in KPI's to achieve efficiencies and

drive performance & innovation in technology to deliver transformation across the service.

- 1.4 The estimated value of the extension is £1.3m and in accordance with the Council's Contract Standing Order 2.2, an extension of this value requires Cabinet approval.

2. Recommendations

- 2.1 Cabinet agrees to extend the existing Street Lighting Contract with Colas Limited for a period of up to 12 months commencing on 1 November 2026, with an estimated value of £1.3m.
- 2.2 Cabinet agrees to delegate authority to the Corporate Director, City Operations, following consultation with the Cabinet Member for Transport, Parking and Public Realm, to take all necessary steps to give effect to the contract extension and variation, including the execution of a Deed of Extension and any associated contractual documentation.

3. Context and background information

- 3.1 The current contract supports the management and maintenance of a substantial asset portfolio including approximately: 19,988 street lighting columns and wall brackets; 2,231 externally illuminated traffic signs; 593 feeder pillars; 194 illuminated bollards; 168 center island beacons; 112 Belisha beacons. It also supports the delivery of high profile capital projects.
- 3.2 The council, as the Highway Authority, has a duty to keep the network safe this includes a duty to maintain those street lighting and illuminated assets that it has provided on the highway network and relies on the contract to undertake routine maintenance, electrical testing, structural inspections, emergency repairs, night scouting, capital replacement works and asset management activities.
- 3.3 Aside from the statutory requirements street lighting is a critical asset required to deliver the cities priorities in terms of delivering safe and accessible, well-maintained streets. Supporting our Accessibility Strategy particularly in respect to supporting our most vulnerable people to travel around the city and supporting the safety of Woman and Girls. These assets play a critical role in supporting our Nighttime economy and investing in our city whiles the contract also supports the heritage street lighting – helping to keep Brighton unique. Furthermore, this contract supports the delivery of the City Transport Strategy 2035 in supporting active travel, EV roll out.
- 3.4 The current contract between the Council and Colas Limited commenced on 1 November 2018 and the original service period of the Contract was 4 years from the commencement date until 31 October 2022. The Contract has subsequently been extended and varied twice in accordance with the contractual provisions available to the Council and is due to expire on 31 October 2026. All contractual extension provisions from the existing Contract have now been exhausted.
- 3.5 On the 2025/26 Annual Procurement Forward Plan (APFP) Cabinet gave authority to the service to proceed to market for the Street Lighting Maintenance Contract, with an estimated value of £25m. This granted

delegated authority to the Corporate Director to procure and award the contract

- 3.6 In extending the existing contract, this will afford time to develop a new £25m, 10-year contract which will support transformation across the city. During the extension period detailed work will be carried out to perfect the new contract specification between Sept 26 -Jan 27. This new contract will be superior and pivotal in supporting the council to manage this critical asset. It will drive performance through use of best practice in terms of contracts and will include strong, performance based KPI's to drive quality, cost, carbon reduction and social value. It will continue to support the city's priorities and help to deliver transformation in terms of EV charging points and innovation in technology while enhancing and maintaining our heritage street lighting columns.
- 3.7 From March, 2027, through open market procurement, we will seek innovation and will draw out the very best learning across the industry and to develop this new contract. We are using best practice learning from previous procurement exercises to drive innovation, competition and achieve the very best in terms of quality and price. Our planned contract award date is November 2027.
- 3.8 The above timetable therefore requires an extension and variation of the existing contract under Regulation 72 of the Public Contract Regulations 2015 for 12 months for the estimated value as set out in the part 2 report..

4.0 Analysis and consideration of alternative options

- 4.1 The proposed extension will afford sufficient time to develop a new transformational contract that will deliver innovation and drive quality, value and performance. Using best practice learning from previous contracts and driving value and quality through a full and open procurement process at every step we can ensure lasting performance.
- 4.2 Alternative procurement frameworks have been explored rather than a contract extension, but this is not considered a viable option due to the mobilisation period, TUPE requirements and likely loss in service during the contract transfer.

5.0 Community engagement and consultation

- 5.1 The proposal relates solely to the continuation of an existing contractual arrangement and will not result in any changes to service levels experienced by residents, businesses or visitors. Consultation has been undertaken with Legal Services, Procurement and Finance in developing the proposed approach.

6. Financial implications

- 6.1 The extension outlined is covered by existing streetlighting budgets and is part of the forecasted TBM05 position for the service. The contract is

required to continue streetlighting operations and cannot be covered internally by existing staff.

Name of finance officer consulted: David Wilder
(14/09/2026):

Date consulted

7.0 Legal implications

7.1 In order to vary a regulated contract, the variation must fall under one of the six 'safe harbors' in Regulation 72 of the Public Contract Regulations 2015 (PCR 2015). The Council has reasonable grounds to rely on Regulation 72(1)(e) 'non-substantial ground' to extend and vary the Street Lighting Contract.

7.2 The legal team will assist with drafting and executing the Deed of Extension & Variation between the Council and Colas Limited.

Name of lawyer consulted: Sabina Cherevicheko
Date consulted: 15/09/2026

8.0 Risk implications

Risk	Impact	Mitigation
Failure to extend and vary the existing Street Lighting Maintenance Contract.	The Council would be unable to maintain street lighting assets to the required standard, increasing the risk of asset deterioration, lighting failures, and reduced network safety. This could impact public confidence, increase the likelihood of third-party claims, and compromise the Council's ability to demonstrate compliance with its statutory duty to maintain a safe highway network. There may also be adverse impacts on personal safety, the night-time economy, and the Council's wider transport and place-making objectives.	Extension and variation of the current contract will ensure continuity of service, maintain asset performance, support compliance with statutory duties, and provide sufficient time to procure and mobilise a replacement contract without service disruption.
Contractor unable to extend beyond the current contract timeframe	Likelihood is low but if the contractor is unable to accept an extended contract the council may be in a position unable to maintain critical assets.	The contractor has agreed to extend the contract with us and are keen to bid for the new contract when it is prepared.

9.0 Equalities implications

- 9.1 As part of the procurement process, a full Equalities Impact Assessment will be undertaken.
- 9.2 Extending the existing street lighting contract will help ensure the continued maintenance and operation of the Council's street lighting assets, supporting a safe, accessible and inclusive highway network for all residents and visitors. Well-maintained street lighting can particularly benefit people with protected characteristics, including older people, disabled people and those with visual impairments, by improving visibility, personal safety and confidence when travelling.

10. Sustainability implications

- 10.1 Extending the current street lighting contract supports the Council's sustainability objectives by ensuring the continued maintenance and optimisation of energy-efficient LED lighting assets across the network. Maintaining a well-performing lighting asset helps minimise energy consumption, reduce carbon emissions associated with street lighting operations, and prolong the life of existing infrastructure, thereby reducing waste and the need for premature replacement.

11. Health and Wellbeing Implications

- 11.1 Well-lit streets support active travel particularly walking and cycling and also contribute to reducing crime and disorder leading to a safer more accessible transport network.

Other Implications

12. Procurement implications

- 12.1 Procurement officers are supporting with the new streetlighting contract and timeframes. This new contract offers an opportunity to develop KPI's for both Social Value and Carbon Reduction in line with procurement advice.
- 12.2 The full procurement implications are set out in section 3 of this report.

13. Crime & disorder implications:

- 13.1 All councils are subject to statutory duty (s17 Crime and Disorder Act 1998) to do all they can to reasonably prevent crime and disorder in their area across the range of services delivered within their communities. The Streetlighting Contract will facilitate continued street lighting across the city which has been proven to deter and reduce crime.

14. Conclusion

- 14.1 Taking all the above considerations into account the recommendations set out in section 2 of this report will enable the council to deliver its priorities

and duties in terms of maintaining a safe public highway by continuing to deliver the street lighting maintenance function.

Cabinet

Agenda Item 60

Subject: Targeted Budget Management (TBM) 2026/27 Month 5 (August)

Date of meeting: Thursday, 15 October 2026

Report of: Cabinet Member for Finance & City Regeneration

Contact Officer: 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 5 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 £23.835m
- 2.2 Cabinet notes the additional risks of £18.862m 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 £1.145m.
- 2.4 Cabinet notes the forecast overspend risk for the ring-fenced Dedicated Schools Grant, which is an overspend of £7.368m in year resulting in a cumulative deficit of £9.130m.
- 2.5 Cabinet notes the progress of transformation programmes shown in Appendix 6 and the delivery of savings as detailed at 3.8 and 3.9 of the report.
- 2.6 Cabinet notes the Treasury Management update at Appendix 3.

- 2.7 Cabinet approves the addition of new projects to the capital programme totalling £0.357m as set out in Appendix 4.
- 2.8 Cabinet approves the capital budget variations of £0.717m and reprofiling of £20.094m set out in Appendix 5.
- 2.9 Cabinet notes the forecast position on the Capital Programme at Appendix 5.
- 2.10 Cabinet notes the aged debt position shown at Appendix 7.

3 Overview

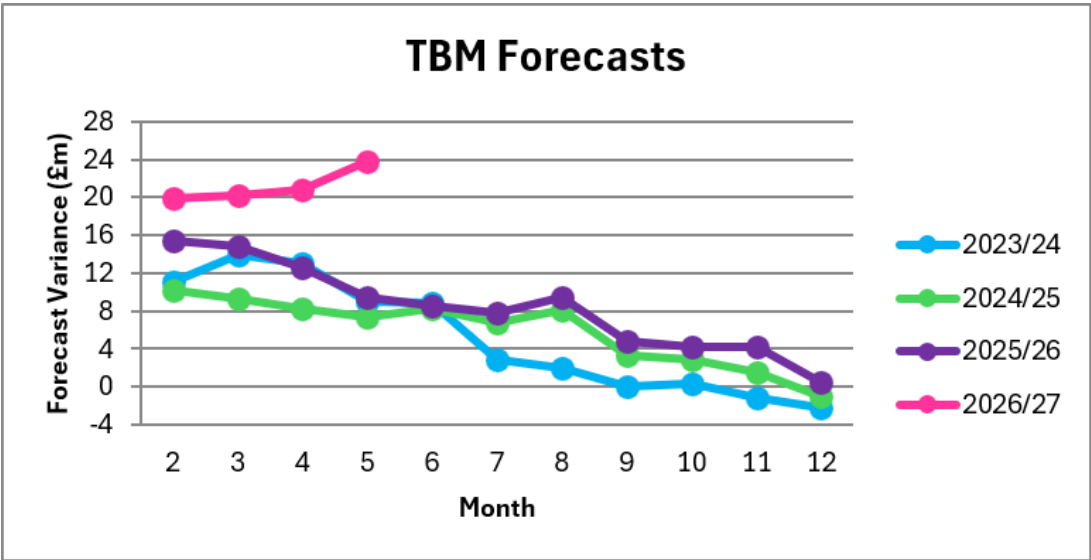
- 3.1 The forecast outturn position at month 5 for the current financial year 2026/27 is an overspend of £23.835m with an additional table of risks (Appendix 2) totalling £18.862m.

Directorate	TBM Budget Month 5 £'000	Forecast Outturn Month 5 £'000	Forecast Variance Month 5 £'000	Forecast Variance Month 5 %	Forecast Variance Month 4 £'000	Movement Month 4 to Month 5 £'000	Direction Of Travel ↑ / ↓
Families, Children & Wellbeing	92,536	96,114	3,578	3.9%	3,599	(21)	↑
Homes & Adult Social Care	160,867	173,862	12,995	8.1%	12,000	995	↓
City Operations	48,505	50,576	2,071	4.3%	2,139	(68)	↑
Central Hub	30,647	31,557	910	3.0%	562	348	↓
Sub Total	332,555	352,109	19,554	5.9%	18,300	1,254	↓
Centrally-held Budgets	16,806	21,087	4,281	25.5%	2,552	1,729	↓
Total General Fund	349,361	373,196	23,835	6.8%	20,852	2,983	↓

- 3.2 The forecast has deteriorated by £2.983m between month 4 and 5.
- 3.3 Centrally-held budgets have seen the largest change. This is primarily driven by the delay of savings in Organisational Transformation (£1.125m). Workshops have been held and data analysed but no significant opportunities have been realised that were not already in services' existing plans and savings targets. A delivery partner has been commissioned to do a more extensive analysis to facilitate these savings in the future but this delay in realisation impacts the 2026/27 forecast position. Council-wide organisational diagnostic work will provide insight and identify clear workstreams for the Organisational Transformation programme going into 2027/28. In addition, £0.550m of one-off costs to be met for schools reorganisation have now been quantified. These costs are expected to support a more financially sustainable schools provision in future years.
- 3.4 In City Operations, parking income remains above the equivalent period in 2025/26 but is currently below the 2026/27 budget target. The budget assumed growth of 8% compared with the previous year, whereas income to date is 6% higher than the same period last year, resulting in a forecast pressure against the target. Growth has been driven primarily by on-street parking income, while car park income has been lower than the previous year as a result of reduced occupancy levels. With the peak summer period now largely complete, there is limited scope for seasonal demand alone to bridge the remaining gap and performance will continue to be monitored closely throughout the remainder of the year.
- 3.5 In Families, Children and Wellbeing, the growth in the number of Education, Health and Care Plans (EHCPs) continues to place significant pressure on both home to school transport and the DSG High Needs Block. As more

children and young people require specialist provision, often outside their local area, transport demand has increased alongside a rise in overall unit costs. This is adding to existing budgetary pressures within local authority services, transport expenditure and the sustainability of the High Needs Block. While the Council continues to review transport arrangements and promote efficient use of resources, the underlying growth in EHCPs remains a key driver of demand-led cost pressure and represents a material financial risk.

- 3.6 In Homes and Adult Social Care, the figures highlight a worsening forecast and a worsening risk position with Adult Social Care continuing to account for the most significant financial pressures. Demand for community care, nursing and residential support remains above budgeted assumptions, while increases in the complexity and cost of care packages continue to drive expenditure growth. ASC remains on track to deliver over 80% of its planned savings and mitigations, and building on the learning from last year's management of provider fee uplift pressures, have undertaken an earlier assessment of the most likely impact of these and as a result, are recognising these risks more transparently at this stage of the financial year. Options for a more corporate response to support fully delivery of savings are being considered.
- 3.7 The below graph shows the trajectory of the forecast compared to previous years. Not only has this year's forecast position started higher than previous years, but has continued to rise through the first part of the year, which is inverse to the trajectory of previous years.



Savings & Transformation Delivery

- 3.8 All services continue to 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. The transformation programmes are overseen by the Innovation and Savings Delivery Board which reports into CLT. An update on the current position of the projects is shown at Appendix 6.

3.9 Workstreams have two RAG ratings; one for project delivery and one for savings delivery. This is because it is entirely possible to have a well managed project which is delivering according to plan (and therefore RAG'd green) but because demand or other factors are overtaking the outcomes, the anticipated savings are not being realised. It should be noted that even when the anticipated savings are reduced, a successful project provides significant cost mitigation against a position which would have been worse. The performance below shows the RAG rating for savings delivery – paragraph 3.10 outlines what each RAG colour represents.

Directorate	● £'000	● £'000	● £'000	● £'000	● £'000	Total £'000
Families, Children & Wellbeing	0	204	239	155	423	1,021
Homes & Adult Social Care	0	829	6,723	7,383	300	15,235
City Operations	220	433	453	2,784	68	3,958
Central Hub	300	300	175	260	10	1,045
Centrally-held Budgets	1,125	0	0	0	0	1,125
Total General Fund	1,645	1,766	7,590	10,582	801	22,384

3.10 Savings in service budgets, not linked to transformation projects are also delivering well with 71% either already delivered or strongly expected to be.

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	356	268	1,264
Central Hub	0	0	404	1,008	213	1,625
Centrally-held Budgets	0	0	450	1,550	0	2,000
Total General Fund	375	400	1,119	3,905	729	6,528

3.11 Savings are RAG'd as follows:

- Grey – the actions required have not yet been planned.
- Red – the actions are understood but unlikely to happen or have an effect.
- Amber – the actions are underway but the outcome is still uncertain.
- Green – there is a strong expectation of a successful outcome.
- Blue – the saving has already been delivered.

3.12 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.

3.13 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 £1.145m and £9.130m respectively with the large overspend in the DSG being driven by increased demand in the High Needs Block. The Department for Education continues to scrutinise closely the past expenditure on the DSG, as it is doing with all Councils currently in preparation for the partial write off of overspends. This is seen as a low risk as previous BHCC expenditure has been compliant and the overspends relatively low compared to other councils, but since the overall value of DSG expenditure is so high, this is acknowledged as a potential threat.

- 3.14 It's important to note that alongside the key factors this month, the overspend is caused by a number of underlying and ongoing pressures. We are a council that is committed to paying the living wage. Not only to our staff but in the organisations we contract with, and that has an impact on what we pay for our social care but as a values-led council, we stand by that commitment. Over the last few years we have budgeted for inflationary increases but global economic changes have caused costs to rise by more than expected inflation. In the same way that our residents are experiencing rapidly rising costs, so is the authority. This has impacted our borrowing costs as well and, as discussed in the Treasury update below and detailed in Appendix 3, we are highlighting a risk that when current debt is refinanced, and the projection of the timescales around that is shown clearly in Appendix 3, it may very well be at a higher cost than the debt which has expired, putting further pressure on our budget.
- 3.15 In 2025/26, very similar cost pressures existed in our budget but were offset by underspends in other areas or by the use of centrally held funds. Those underspends were reset in the 2026/27 budget with increased income targets which helped to balance the overall position. Those targets are largely being met but their inclusion in the budget means they are no longer available as unbudgeted surplus to offset the other overspends. In short, the council has been managing its finances closely and continues to do so but like so many councils, the underlying increases in demand and the increasing levels of complexity and therefore cost are overwhelming the savings being made, while at the same time, elements outside of our control such as rising fuel costs and inflation have materially increased the cost of service delivery. The Council continues to pursue its transformation agenda as the means of delivering true and long lasting financial sustainability for the future.

Treasury, Debt and Capital

- 3.16 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 Appendix 3 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, the council's 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.
- 3.17 New project capital funding requested for Cabinet approval totals £0.357m over two projects. Further details are provided in Appendix 4.
- 3.18 Appendix 6 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 5 £'000
Budget approved at TBM02	272,809
Changes reported at other committees and already approved, to be included for TBM5	9,082
New schemes to be approved in this report (see Appendix 6)	123
Variations to budget (to be approved)	717
Reprofiling of budget (to be approved)	(20,094)
Slippage (to be approved)	0
Total Capital	262,637

3.19 The notable variations not previously agreed, where budget is increasing, are £1.400m additional borrowing for the Madeira Terraces Regeneration project, and £0.524m for the Asbestos programme. There is in addition a reduction in budget and borrowing of £1.000m for the Valley Gardens Phase 3 project.

3.20 It is worth noting that the MTFS from 2027/28 onwards expects a saving in the revenue cost of the capital programme of £1.5m 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 £1.5m per annum from the current projection.

4 Analysis and consideration of alternative options

4.1 The forecast outturn on General Fund budgets is an overspend of £23.835m m with additional risks of £18.862m. This exceeds the Council's available reserves and likely ability to mitigate and therefore will require additional EFS.

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. 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.

6.2 The financial position of the council remains challenging and while mitigations and further savings are constantly being developed and implemented, as evidenced by the tables above, external demand continues to overwhelm them. Going forward, the council is taking a transformational approach to the closure of the budget gap but the change required is and will continue to be, significant. The authority's reserves are insufficient to offset the overspend and further EFS will be required, while we acknowledge that this in itself is a short term solution and the repayment of it brings additional cost in the coming years. It provides single year mitigation for ongoing budget

pressures, meaning that unless additional funding and savings are found that exceed the current overspend, the budget gap will not close.

Finance Officer consulted: Elizabeth Griffiths Date: 02/10/2026

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 s151 officer's view that Exceptional Financial Support is required in order to achieve a balanced budget.

Lawyer consulted: Elizabeth Culbert Date: 05/10/26

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 more significant risk is that if our request for further EFS is not approved, the Council's Chief Financial Officer would be forced to issue 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.

10 Sustainability implications

- 10.1 An inability to balance the budget in the current financial year would require the Council to issue 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 TBM5 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 overspend but gives a more realistic and accurate expectation of the authority's year end position.
- 12.2 The reported financial position has required the Council to approach MHCLG to request more Exceptional Financial Support for 2026/27. This is expected to be a sum of up to £30m. It should be noted that this is additional borrowing, not additional funding.
- 12.3 The financial position of the council remains challenging and while mitigations and further savings are constantly being developed and implemented, as evidenced by the tables above, external demand continues to overwhelm them. Going forward, the council is taking a transformational approach to the closure of the budget gap but the change required is and will continue to be, significant. The authority's reserves are insufficient to offset the overspend and further EFS will be required, while we acknowledge that this in itself is a short term solution and the repayment of it brings additional cost in the coming years. It provides single year mitigation for ongoing budget pressures, meaning that unless additional funding and savings are found that exceed the current overspend, the budget gap will not close.

Supporting Documentation

Appendices

1. Forecast Dashboards by Service
2. Additional risks not included in the forecast
3. Treasury Management update
4. New capital schemes
5. Capital programme performance
6. Update on the progress of Transformation programmes and key risks
7. Aged Debt

Revenue Budget Summary	Month 5	Forecast	Variance	Variance	DoT
	Budget	Outturn			
	£'000	£'000	£'000	%	To Month 4
Children in Care Placements	31,532	34,804	3,272	10.38%	↓
Disability Family Support	370	676	306	82.70%	=
Children in Care Mental Health Contract	-	100	100	0.00%	=
Families First and Social Work	17,496	16,702	(794)	-4.54%	↑
Preventive (Section 17)	491	327	(164)	-33.40%	↑
In-House Residential & Respite	3,833	4,048	215	5.61%	↑
Fostering & Adoption	4,819	4,729	(90)	-1.87%	↑
Other	4,740	5,026	286	6.03%	↑
Total	63,281	66,412	3,131	4.95%	↓

Key Variances

The forecast position has slightly worsened since the Month 4 report, primarily due to increased demand for Children in Care placements. While demand typically rises during the second quarter, the current increase is significantly higher than anticipated. This, combined with rising residential placement costs linked to a higher number of children with complex needs, has contributed to the increased forecast overspend. Forecast recovery measures have also been reduced to account for the increasing demand for children in care, lowering the level of risk within the forecast. These pressures have been partially offset by improvements across other service areas, supported by strengthened financial controls and recruitment activity. The forecast includes savings achieved of £1.391m.

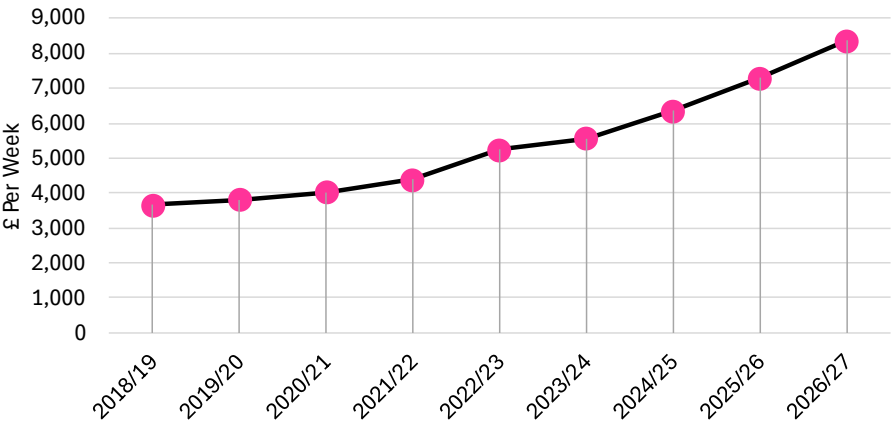
Risks & Mitigations

The Children’s Placements budget continues to face significant pressure due to 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, creating a significant challenge for the service in mitigating the risk of further overspends. The financial recovery plan has been scaled back to reduce the inherent risk within the forecast; however, significant financial risk remains. Tight spending controls and recruitment controls across other services are being maintained to help mitigate these pressures and support the overall financial position.

Savings, Mitigations & Transformation

£'000	●	●	●	●	●	Total
Savings	-	100	-	582	42	724
Pressure mitigations	-	-	-	-	-	-
Transformation programmes	-	-	239	105	423	767
Total	-	100	239	687	465	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 50% rise since March 2024.

Revenue Budget Summary	Month 5	Forecast	Variance	Variance	DoT
	Budget	Outturn			
	£'000	£'000	£'000	%	To Month 4
English as an Additional Language and Traveller Service	-	505	505	0.00%	↓
Public Health contribution to Schools Wellbeing	(200)	-	200	100.00%	=
Schools PFI	1,209	709	(500)	-41.36%	↑
Early years & Nurseries	1,777	1,837	60	3.38%	↓
Home to School Transport	9,152	9,513	361	3.94%	↑
Libraries	4,211	4,357	146	3.47%	↑
Community Cohesion	3,011	3,011	-	0.00%	↑
Other	10,095	9,770	(325)	-3.22%	↑
Total	29,255	29,702	447	1.53%	↑

Key Variances

The overall forecast position has improved since last month, supported by the continuing improvement in the schools PFI contract and ongoing scrutiny of spending and recruitment. Home to School Transport has also shown a slight improvement this month; however, this reflects the earlier end of the school term for some pupils in July and should not be interpreted as an ongoing trend. The processing and recording of new contracts remains ongoing, meaning that complete information is not yet available to accurately forecast expenditure for the new academic year. The current forecast is therefore based on trends from previous years and may change significantly once the full information is available.

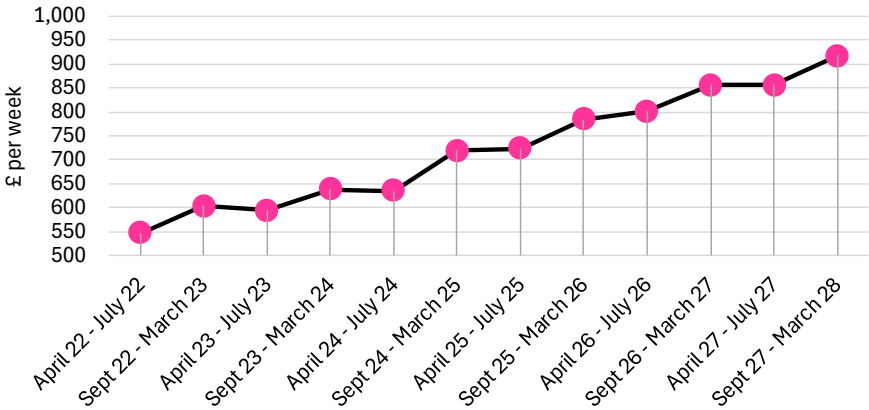
Risks & Mitigations

There is a financial risk that the number of pupils eligible for Home to School Transport from September may be higher than the assumptions included in the budget, which are based on trends from previous years. This is further impacted by ongoing volatility in the taxi market, which could increase pressure on the forecast outturn position. The transport team continues to manage costs closely, including through the use of personal travel budgets and further review of transport routes.

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 5	Forecast			
	Budget	Outturn	Variance	Variance	DoT
	£'000	£'000	£'000	%	To Month 4
Individual Schools Budget	145,679	145,679	-	0.00%	=
Early Years Block	48,108	47,673	(435)	-0.90%	↑
High needs Block (Excluding delegated to schools)	43,169	50,966	7,797	18.06%	↓
Exceptions & Central Services	3,398	3,404	6	0.18%	=
Grant Income	(240,354)	(240,354)	-	0.00%	=
Brought Forward Deficit	(1,762)	-	1,762	100.00%	=
Total	(1,762)	7,368	9,130	518.16%	↓

Key Variances

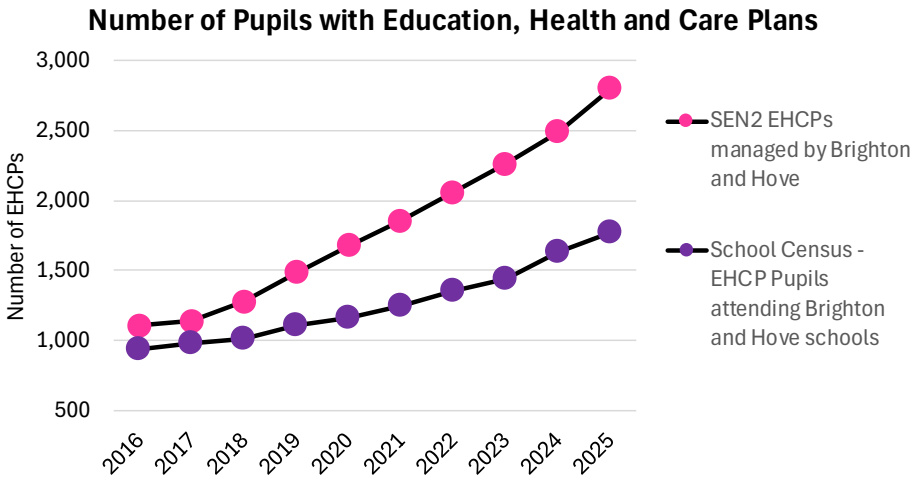
The overall DSG position has marginally worsened since TBM4 with significant adverse variances within High Needs Block budgets of the DSG. There are predicted in-year overspends across a range of budgets including mainstream and special schools top-up funding, external educational agency placements in 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) are 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 nationally, 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	-	-	-	-	-	-



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 5	Forecast	Variance	Variance	DoT
	Budget	Outturn			
	£'000	£'000	£'000	%	To Month 4
Community Care - Physical & Sensory Support	32,094	39,948	7,854	24.47%	↓
Community Care - Learning Disabilities	50,499	50,897	398	0.79%	↑
Community Care - Memory & Cognition	11,547	11,781	234	2.03%	=
Community Care - Mental Health	13,507	16,383	2,876	21.29%	↓
Assessment teams	14,946	15,024	78	0.52%	=
In-house services	11,336	12,248	912	8.05%	=
Commissioning & Partnerships	5,884	6,068	184	3.13%	=
Total	139,813	152,349	12,536	8.97%	↓

Key Variances

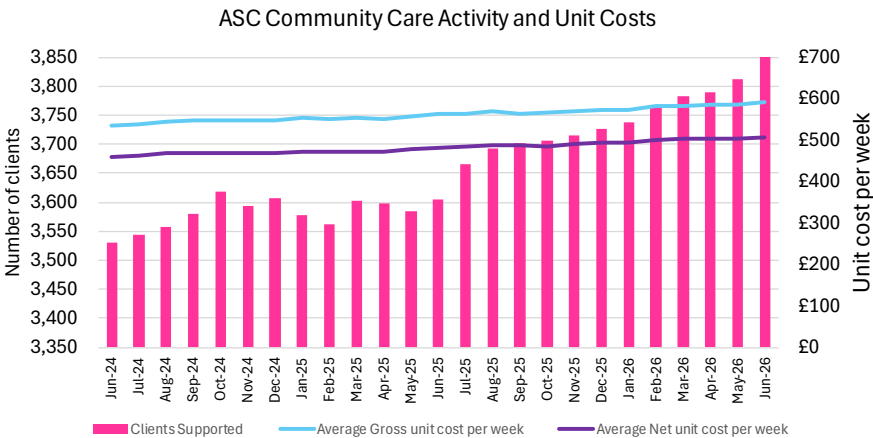
The overall forecast for ASC has increased by £900k from TBM4 . The projected overspend on Community Care placement and packages of care is due to the number of clients being supported and the average unit cost of care being above budgeted levels. The total financial recovery plan for Adult Social Care totals £10.115m, with £4.9m achieved and £3.4m anticipated to be achieved and is reflected in the forecast. The forecast of growth in demand will be subject to a deep dive to evaluate how the MHCLG investment of £6.4 million can be deployed to accelerate the interventions related to managing demand and containing costs. Provider fee uplift requests of £2.3m have been received of which £0.6m has been agreed to date, leaving £1.8m pressure not included in the forecast. ASC and Commissioning continue to implement and find new opportunities for financial sustainability which also aligns with regulatory CQC improvement journey.

Risks & Mitigations

In 2025/26, the outturn for community care budgets was £6.8m overspent and the net uplift after savings for 2026/27 was £2.1m. The cost of care required for the people related to the overspend in 25/26 continues, and will continue given the long-term nature of care, especially for working age adults with long term conditions, this creates a structural overspend into 27/28. There are significant challenges in mitigating the risks from increasing demands and unit costs, where pressures in the independent sector continue to rise at a pace above general inflation and the council's commitment to paying the living wage. In respect of financial recovery and the ongoing management of Community Care Budget pressures, a monthly meeting provides rigorous monitoring and oversight of ASC Transformation. Each month the top ten spends on placements and packages of care are reviewed to ensure immediate remedial action is undertaken.

Savings, Mitigations & Transformation

£'000	●	●	●	●	●	Total
Savings	-	-	-	23	-	23
Pressure mitigations	-	-	-	-	-	-
Transformation programmes	-	1,813	3,432	4,847	-	10,092
Total	-	1,813	3,432	4,870	-	10,115



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 5	Forecast	Variance	Variance	DoT
	Budget	Outturn			
	£'000	£'000	£'000	%	To Month 4
HPS - Temp Accommodation (TA) and Allocations	14,641	15,176	535	3.65%	↓
HPS - TA Management & Support	804	667	(137)	-17.03%	↓
HPS - Rough Sleeper & Housing related Support	4,455	4,455	(0)	-0.01%	↑
HPS - Travellers	397	441	44	11.07%	=
H&I - Private Sector Housing	577	580	3	0.54%	↑
H&I - Housing Strategy and Enabling	180	194	14	7.64%	↑
Total	21,054	21,513	459	2.18%	↓

Key Variances

The forecast position has slightly worsened since the Month 4 report, primarily due to increased demand for Temporary Accommodation, particularly within spot-purchased accommodation. Whilst demand reduced during the first four months of the year, August saw a significant increase in households requiring TA, reversing the previous downward trend and increasing accommodation costs above forecast assumptions. The forecast has also been adversely impacted by delays in delivering a number of savings initiatives, including the Exempt Accommodation programme and EPC related proposals, reducing the level of savings achievable in 2026/27. In addition, delays to key transformation projects, including the Dynamic Market and Base One arrangements, continue to present delivery risks. Work is ongoing to mitigate these pressures and maximise future savings opportunities; however, further delays may increase the level of financial risk within the forecast.

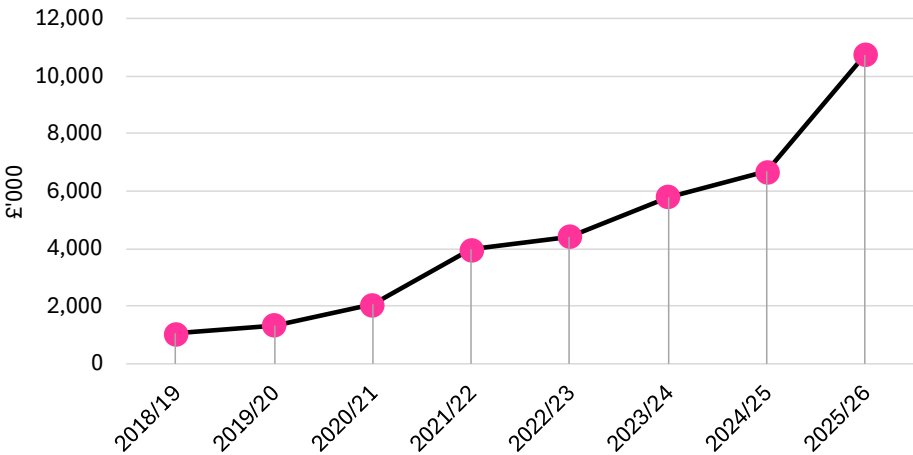
Risks & Mitigations

Temporary Accommodation remains the most significant demand-led financial pressure within the Housing General Fund, driven by sustained homelessness demand, increasing accommodation costs and Housing Benefit subsidy loss. The TA Recovery Plan continues to mitigate these pressures, reducing reliance on high-cost nightly paid accommodation, increasing lower-cost provision, supporting move-on into settled housing and delivering operational efficiencies. However, delivery of forecast savings remains dependent on affordable housing supply and maintaining reductions in demand. Current accommodation pressures of £2.171m are offset by forecast savings of £1.636m from the recovery programme. Whilst work continues to strengthen financial sustainability, delays to key transformation initiative, procurement of the dynamic marketing for block booked accommodation, and in year delivery of saving projects, EPC and exempt accommodation, remain a financial risk during the remainder of the year.

Savings, Mitigations & Transformation

£'000						Total
Savings	-	-	-	-	-	-
Pressure mitigations	-	-	-	-	-	-
Transformation programmes	-	829	2,307	1,707	300	5,143
Total	-	829	2,307	1,707	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 5	Forecast	Variance	Variance	DoT
	Budget	Outturn			
	£'000	£'000	£'000	%	To Month 4
Repairs & Maintenance	19,421	19,207	(215)	-1.10%	↓
Housing Management & Support	6,933	6,888	(45)	-0.65%	↑
Housing Investment & Asset Management	(124)	(508)	(384)	-309.33%	↑
Housing Safety & Regulatory Compliance	3,807	4,282	476	12.49%	↓
Housing Strategy & Supply	2,134	2,111	(23)	-1.07%	↓
HPS -Tenancy Services	17,534	18,073	540	3.08%	↓
HPS - Council-owned Temporary Accommodation	200	748	548	273.98%	↑
Rent & Service Charges	(78,336)	(78,336)	-	0.00%	=
Capital Financing Costs	11,417	11,417	-	0.00%	=
Direct Revenue Funding	17,014	17,262	248	1.46%	↓
Total	-	1,145	1,145	0.00%	↓

Key Variances

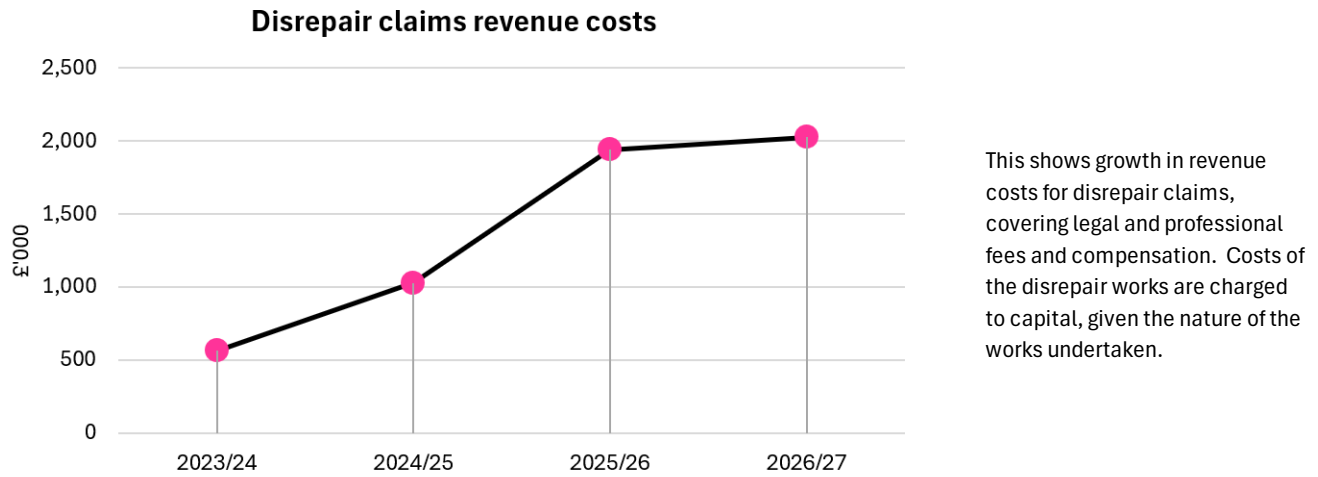
The council continues to invest in the safety, quality and maintenance of council homes, with significant spending on fire and building safety, essential repairs and major improvement programmes.

Disrepair costs are forecast at £1.9m, partly offset by a £1m earmarked reserve - officers from across the council are testing and learning from new approaches to reduce the 'no-win/no-fee' legal interventions by proactive negotiations with tenants to address the issues at the earliest stage possible, consequently disrepair claims remain lower than at the same point last year.. Teams are also addressing the surge in repairs arising from increased reporting linked to damp and mould and the proactive promotion of Awaab's Law.

The forecast also includes major investment in building safety and compliance programmes, including fire safety works, Bristol Estate and other schemes that support the long-term safety and quality of council housing.

Risks & Mitigations

Demand for housing management and tenancy support remains high, reflecting increasingly complex resident needs. Continued investment in preventative and targeted support helps sustain tenancies, support vulnerable households and improve rent collection performance, contributing to the long-term financial sustainability of the Housing Revenue Account.



Revenue Budget Summary	Month 5	Forecast	Variance	Variance	DoT
	Budget	Outturn			
	£'000	£'000	£'000	%	To Month 4
City Infrastructure	47,013	48,223	1,210	2.57%	↑
Culture & Environment	20,918	21,317	399	1.91%	↑
Environmental Services	43,357	44,420	1,063	2.45%	↑
Place	4,896	5,161	265	5.41%	↓
Digital Innovation	10,500	9,513	(987)	-9.40%	↑
Total	126,684	128,634	1,950	1.54%	↑

Key Variances

A key change from the month 4 report is the net improvement of £500k in City Infrastructure following the decision to capitalise £880k of costs which has been offset by an increase £380k in month associated with the risk of a bad winter impacting on the condition of the city's road network. £300k improvement across collection and street cleansing following a review of expenditure with the service, with a minor improvement in Digital Innovation based on the latest spend controls and vacancy management.

Risks & Mitigations

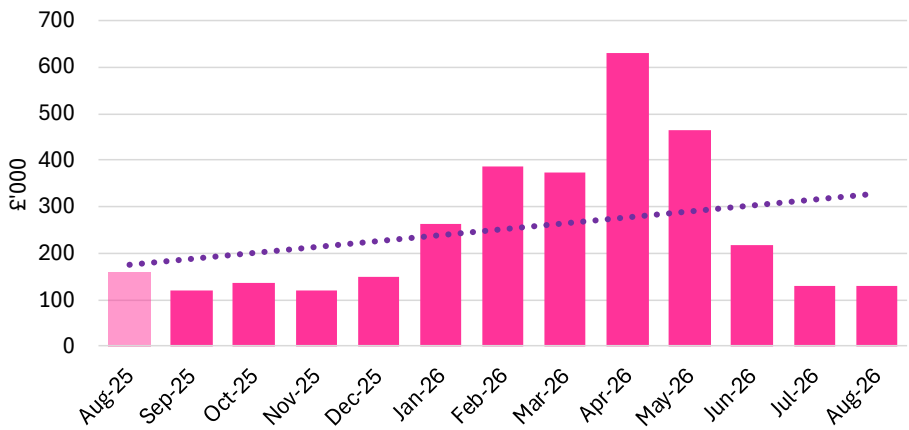
Previous risks reported have been reviewed and are still identified as risks. These include Concessionary Fares, with Compass moving to a claims basis and the forecast rising from £0.257m to £0.365m. Further risks include additional arboriculture disease work, extra collection resources, high agency spend, ageing fleet hire costs and no carry forward for project resource. Mitigations include reviewing vacant Building Control posts before adding resources.

There is a risk that the Highway repairs will increase further but is dependant on further adverse weather conditions which could impact repairs, particularly across the winter period.

Savings, Mitigations & Transformation

£'000	●	●	●	●	●	Total
Savings	375	-	265	235	268	1,143
Pressure mitigations	-	-	-	-	-	-
Transformation programmes	-	-	110	-	60	170
Total	375	-	375	235	328	1,313

Monthly cost of Highway repairs



Forecast expenditure for the year is £3.2m based on spend incurred since April 2026 and assuming a spend profile for the remaining 9 months which is consistent with the same period in 2025/26. For comparative purposes August 25 has been included but not part of the forecast calculation.

Revenue Budget Summary	Month 5	Forecast			
	Budget	Outturn	Variance	Variance	DoT
	£'000	£'000	£'000	%	To Month 4
City Infrastructure	(53,347)	(53,124)	223	0.42%	↓
Culture & Environment	(11,813)	(13,730)	(1,917)	-16.23%	↓
Environmental Services	(10,277)	(9,131)	1,146	11.15%	↓
Place	(2,562)	(2,373)	189	7.38%	↑
Digital Innovation	(180)	300	480	266.67%	↓
Total	(78,179)	(78,058)	121	0.15%	↓

Key Variances

A key change from the month 4 report includes a reduction of Parking incomes reflecting actual usage over the year to date period. On-Street income is 6.6% up compared to last year, however the target is 8% based on the savings across the MTFs and much of this is weighted towards the summer. These will be under further review as the summer months continue. These have been mitigated within City Infrastructure through further incomes within Bus Shelter Advertising.

Building Control income forecasts have also reduced based on year to date actuals, but will also be kept under review.

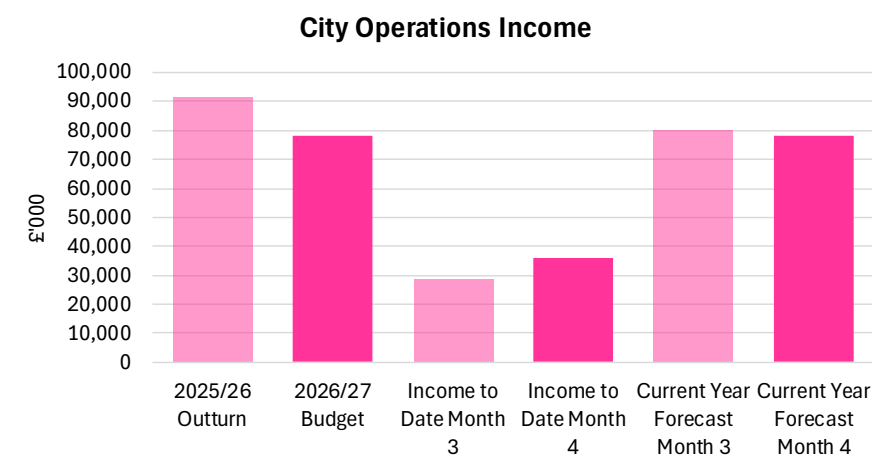
There are other income improvements across City Operations including Venues and revised forecasts within Commercial Waste. All other income forecasts have been reviewed and there are no further key changes.

Risks & Mitigations

Previous risks reported have been reviewed and are still identified as risks. These include parking and PCN income pressures. 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	220	433	343	2,784	8	3,788
Total	220	433	343	2,905	8	3,909



City Operations is showing £35.874m (£28.371m TBM4) income received to date with an outturn forecast of £78.058m (£80.145m TBM4) against an income target of £78.179m. Achieved to date is 45% (35% TBM 3) of the forecast income. Income may not always be linear and may have peak times during the year such as summer months or actioned through year end entries. Prior year income was £91.308m which included use of BSIP grant towards related expenditure.

Revenue Budget Summary	Month 5	Forecast	Variance	Variance	DoT
	Budget	Outturn			
	£'000	£'000	£'000	%	To Month 4
Cabinet Office	1,189	1,290	101	8.49%	↓
Corporate Leadership Office	1,107	1,107	-	0.00%	=
Finance & WRBS	11,264	11,748	484	4.30%	↓
Property Estates	(4,873)	(3,874)	999	20.50%	↑
Property Other	9,670	9,137	(533)	-5.51%	↓
Governance & Law	5,008	4,628	(380)	-7.59%	↑
People & Innovation	6,160	6,399	239	3.88%	↓
Contribution to Orbis	1,122	1,122	-	0.00%	=
Total	30,647	31,557	910	2.97%	↓

Key Variances

The Directorate's position worsened by £0.276m at TBM5, mainly due to pressures in Strategic Communications and Engagement (£0.238m), driven by an unachievable income target (£0.044m contribution from PH), staffing costs (£0.113m), and licence costs (£0.040m). There is also an income pressure in the Cabinet Office linked to a savings target that was originally allocated elsewhere (£0.164m).

Property Services continues to report a £0.999m pressure, largely due to lost rental income and costs associated with vacant properties. This is partly offset by a £0.281m income overachievement in the Surveying Team from increased SEND and direct commission projects. Planned recruitment is expected to reduce this overachievement by £0.120m. Elsewhere, changes are minimal, ELLC improved forecast by £0.201m from overachievement of income in registration and Local Land Charges services.

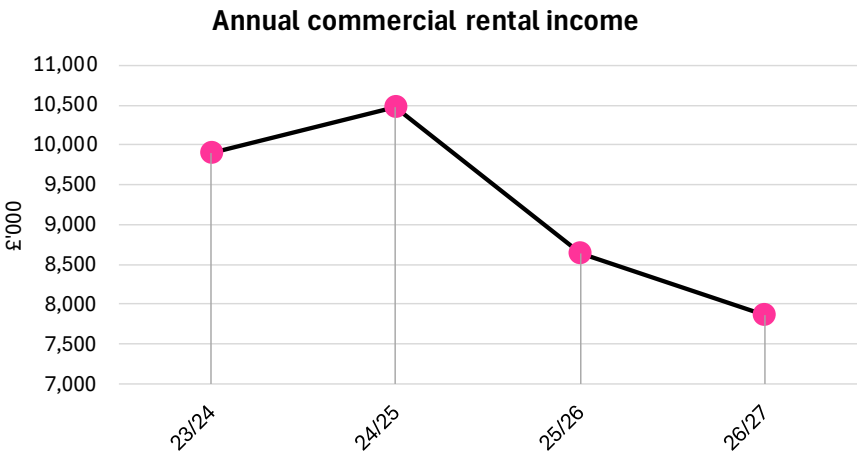
Risks & Mitigations

There has not been significant changes to underlying risks within the directorate. Key risks remain within the Central Hub, particularly across Property, WRBS and enabling services. Property budgets face ongoing pressure from rising maintenance and landlord costs linked to vacant properties and unexpected repair works. The biggest financial risks are continued shortfalls in rental income and the reliance on additional Surveying income and new projects to offset budget pressures.

Legal, Finance, HR and Procurement services also remain stretched, with extra capacity needed to support council wide transformation programmes.

Savings, Mitigations & Transformation

£'000	●	●	●	●	●	Total
Savings	-	-	404	1,008	213	1,625
Pressure mitigations	-	-	-	-	-	-
Transformation programmes	300	300	175	260	10	1,045
Total	300	300	579	1,268	223	2,670



2025/26 saw the closure of New England House reducing the commercial income generated by c.£900k. Other factors for the reduced income relates to the disposal of properties to achieve a capital receipt, void properties or rent reductions as a consequence or lease renewals or new lettings.

Revenue Budget Summary	Month 5	Forecast	Variance	Variance	DoT
	Budget	Outturn			
	£'000	£'000	£'000	%	To Month 4
Bulk Insurance Premia	4,565	4,665	100	2.19%	=
Capital Financing Costs	13,453	13,960	507	3.77%	↓
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	6,896	10,149	3,253	47.17%	↓
Total	16,806	21,087	4,281	25.47%	↓

Key Variances

There has been a £1.729m increase in the overspend within centrally-held budgets. The primary change is the non-delivery of savings attached to the Organisational Transformation programme held centrally (£1.125m). Whilst headway has been made in delivering organisational change, this has been in areas that were already identified by services. There has been some delay in delivery of the cross-cutting programme.

In addition, costs associated with schools reorganisation (£0.550m) has been included in the forecast. These costs are one-off and is expected to contribute to a more financially sustainable schools provision moving forwards.

Risks & Mitigations

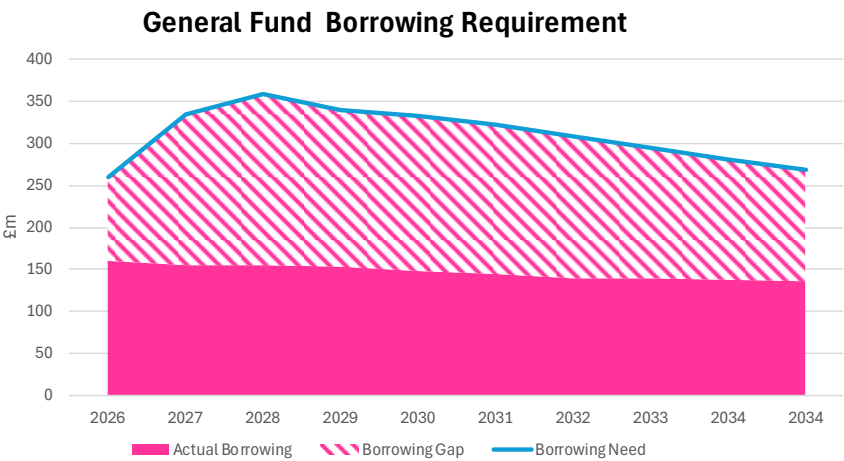
Organisation diagnostics work is due to start imminently which will provide insight and identify clear workstreams for the Organisational Transformation programme going into 2027/28.

The latest guidance regarding Dedicated Schools Grant has resulted in an emerging risk of not being able to fully recover corporate costs from the DSG, the full value of which is included in the financial risks appendix. Work will be undertaken to review this risk and quantify the council's exposure further.

The risk around an increase in Housing Benefit Subsidy losses is still being investigated and an increase in pressure is likely to arise once the work is concluded.

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 5 £'000 Explanation of Key Risks

Area		
Family Help & protection	1,000	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	1,000	
Adult Social Care - Provider fee negotiations	1,749	Risk of provider fee negotiations exceeding budget: £2.322m claims received and £0.573m has been agreed and included in the budget forecast.
ASC (cashable) savings still to be achieved	700	From the Savings and Efficiency workstream (Amber/Red RAG)
ASC pressure mitigations (cost avoidance) still to be achieved	2,626	From the Savings and Efficiency workstream (Amber/Red RAG)
ASC Transformation projects still to be achieved	1,920	From the Savings and Efficiency workstream (Amber/Red RAG)
Adult Social Care - Community Care demand	3,983	Insufficient growth allowed for demand in the remainder of the financial year (this was £4,283m and reduced at TBM5 due to crystalised risks (net increase of 20 people, equating to £0.300m)
Housing	3,136	Risk of anticipated savings not reducing forecast spend due to increasing demand (Amber and red savings tracker TBM5)
Fuel prices and Utility costs	28	The projected risk reflects general fund costs only
Total Homes & Adult Social Care	14,142	
Utilities and Fuel	391	Inflation risk related to the cost of utilities (6%) and fuel (30%) based on the current forecast.
Total City Operations	391	
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
Welfare, Revenues & Benefits	120	Risk of increased agency costs for dealing with the backlog of Council Tax queries.
Total Central Hub	689	
Sub Total	16,222	
Other Corporate Items	1,100	The latest guidance regarding Dedicated Schools Grant has resulted in an emerging risk of not being able to fully recover corporate costs from the DSG. Work will be undertaken to review this risk and quantify the council's exposure further.
Housing Benefit Subsidy	1,540	Risk of increase in Housing Benefit Subsidy losses. A detailed review is underway.
Total Centrally-held Budgets	2,640	
Total General Fund	18,862	

Appendix 3 - Treasury Management Update TBM5

Treasury Management Activity

	GF Borrowing	HRA Borrowing	Total Borrowing	Movement	Investments	Movement
	£'000	£'000	£'000		£'000	
Opening Balances 1 June 2026	(162,265)	(358,030)	(520,295)	=	31,440	
Long-Term Borrowing raised (GF)	(20,000)	-	(20,000)	↑	-	=
Long-Term Borrowing raised (HRA)	-	(20,000)	(20,000)	↑	-	=
Long-Term Borrowing repaid (GF)	601	-	601	↓	-	=
Long-Term Borrowing repaid (HRA)	-	-	-	=	-	=
Short Term Borrowing raised	-	-	-	=	-	=
Short Term Borrowing repaid	5,000	-	5,000	↓	-	=
Investments made	-	-	-	=	55	↑
Investments maturing	-	-	-	=	-	=
Net Money Market Transactions	-	-	-	=	21,582	↑
Net Movement	(14,399)	(20,000)	(34,399)	↑	21,637	↑
Closing Balances 31 August 2026	(176,664)	(378,030)	(554,694)	↑	53,077	↑

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. Two new PWLB loans were undertaken in the period to fund the council's ongoing capital financing requirement, with one General Fund loan of £20m undertaken at a rate of 4.96% for a term of 3 years, and one HRA loan of £20m undertaken at a rate of 4.64% for a term of 4 years. New borrowing has been undertaken on relatively short terms compared to the wider borrowing portfolio due to currently elevated interest rates on medium to longer term borrowing; which whilst increases refinancing risk in the short term in a volatile interest rate environment, is anticipated to reduce ongoing costs and allow refinancing when longer terms rates are forecast to be lower.

Investment Performance

The council's investment portfolio (adjusted for pooled funds) achieved an average rate of 3.90% in the period, outperforming against the SONIA benchmark rate of 3.73%. Investment balances have been largely maintained in liquid MMFs, with returns slightly increased compared to earlier in the year as money markets factor in a potential Base Rate increase.

Investment Performance

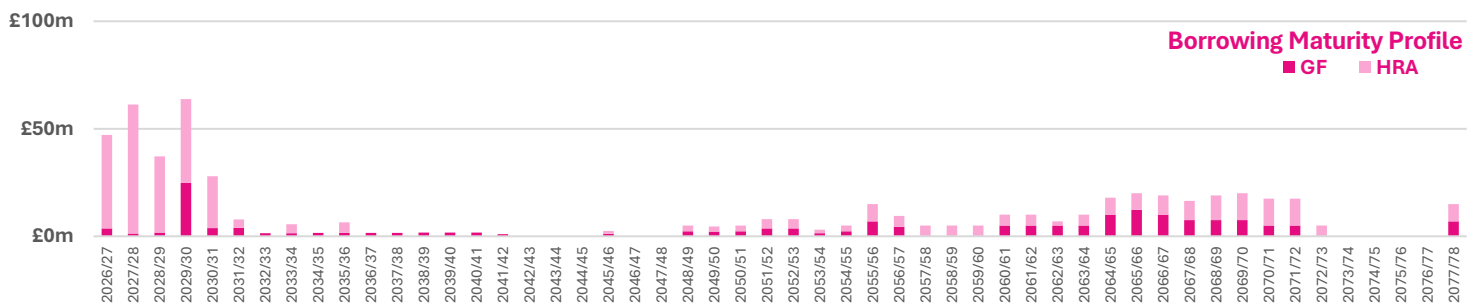
	Oct to March 2025/26	April - May 2026	June - Aug 2026	DoT
Average Investment Rate	4.15%	3.87%	3.90%	↑
SONIA Benchmark Rate	3.83%	3.73%	3.73%	=
Performance against benchmark rate	0.32%	0.14%	0.17%	
	✓	✓	✓	

Borrowing Summary

Total borrowing at the end of the period was £554.694m held at an average rate of 3.39% 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	162,734	361,960	524,694	3.33%
Market Loans	13,930	16,070	30,000	4.33%
Short Term Borrowing	-	-	-	0.00%
Total Borrowing	176,664	378,030	554,694	3.39%



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 and inflation concerns, 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.

New schemes to be added to the Capital Programme for 2026/27 to be Approved**New Capital Scheme for Approval****Project Title:** Dorset Gardens Improvements**Directorate/Service:** City Operations/Environment & Culture**Total Capital Project Cost:** £0.237m

Capital Funding Source	2026/27	2027/28	2028/29	2029/30	2030/31	Total All Years
	£m	£m	£m	£m	£m	£m
Section 106	0.053	0.184	0.000	0.000	0.000	0.237
Total	0.053	0.184	0.000	0.000	0.000	0.237

Revenue Impact	2026/27	2027/28	2028/29	2029/30	2030/31	Total All Years
	£m	£m	£m	£m	£m	£m
Impact	0.000	0.000	0.000	0.000	0.000	0.000
Total	0.000	0.000	0.000	0.000	0.000	0.000

Purpose, Benefits & Risks

City Parks Projects Team are working with local residents, businesses and event providers to identify improvement needs at Dorset Gardens. We have identified £0.237m of s106 developers funds to invest in amenity improvements, including:

- £0.030m design and build of new DDA compliant entrance into Dorset Gardens at the South Entrance
- £0.013m install new events supply
- £0.010m in soft landscaping
- Remaining budget of £0.184m to be allocated to refurbishing the Grade II listed cast iron fencing

Benefits:

The proposed improvements will benefit local residents, businesses, and event attendees by providing an improved amenity space, enhanced accessibility and increased biodiversity. These improvements deliver against the following corporate objectives:

Outcome 1 A city to be proud of

Conserve and develop our unique culture and heritage.

- This will be delivered by the repair, conservation or replacement of the perimeter heritage iron railings, gates and low wall.

Outcome 2 Our Goal to be inclusive, fair and accessible to all and the Accessible City Strategy.

- Improvements to the garden access points will help to promote an accessible open space for all.

Risks:

The current surfacing at the southern and northern entrances are in need of repair and at risk of becoming a significant hazard for pedestrians. The heritage asset of the Grade II listed railings are also at risk of becoming beyond repair if no action is taken.

Financial Implications

The capital spend is anticipated to be contained within the S106 funds identified, so no ongoing borrowing costs. No regular maintenance costs are anticipated at this stage but the service will seek to raise funds through the activities on the site to cover any ad hoc requirements.

New Capital Scheme for Approval

Project Title: Front Door for Families (FDFF) Guardian replacement

Directorate/Service: FCW/Family Help and Protection

Total Capital Project Cost: £0.120m

Capital Funding Source	2026/27	2027/28	2028/29	2029/30	2030/31	Total All Years
	£m	£m	£m	£m	£m	£m
Service Borrowing	0.070	0.050	0.000	0.000	0.000	0.120
Total	0.000	0.000	0.000	0.000	0.000	0.120

Revenue Impact	2026/27	2027/28	2028/29	2029/30	2030/31	Total All Years
	£m	£m	£m	£m	£m	£m
Borrowing cost	0.000	0.027	0.027	0.027	0.027	0.108
Total	0.000	0.027	0.027	0.027	0.027	0.108

Purpose, Benefits & Risks

Civica served notice on Front Door for Families (FDFF) Guardian business system which will cease from end of March 2028. FDFF is a sensitive and time critical service which includes the multi-agency safeguarding hub (MASH).

Replace the FDFF Guardian business system with a new in-house solution before 2028. This will be based on Eclipse and PowerBI Streamed Reporting for the MASH dashboard. Complete before Civica withdraw Guardian. Alternatives. No savings with Civica off-the-shelf solution and would still need to develop with same in-house resources. Commissioning a new system has costly capital outlay and time consuming and will need Eclipse integration.

No cashable benefit as this is neutral after implementation. Non-cashable benefits:

- Continuity with Eclipse and data integrity. Operational safeguarding aligned to existing casework system.
- Same day reporting (currently Eclipse reporting is one day in arrears). Wider use by FCW and ASC.
- A healthy city and responsive (Outcome 3) and learning council with well-run services (Outcome 4).

Risk. Safeguarding given information sharing between partner agencies impacted due to availability or timeliness of information. Mitigate by test and build robust system tailored to our requirements, and Eclipse supported by ITD Business Support.

Financial Implications

In-house development and implementation costs are to be provided by the IT&D service of around £0.007m, the rest of the budget will be spent on the system costs. Any future costs for the PowerBI Streamed Reporting license will be revenue expenditure and covered within the revenue budget. Borrowing costs of £0.027m over 5 years has been built into the revenue budget.

Families, Children & Wellbeing – Capital Budget Summary

Forecast Variance Month 2 £'000	Unit	Reported Budget Month 2 £'000	Reported at Other Committees £'000	New Schemes £'000	Variations £'000	Slippages & Reprofiles £'000	Reported Budget Month 5 £'000	Forecast Outturn Month 5 £'000
0	Family Help and Protection	272	0	70	0	0	342	342
0	Education and Learning	25,260	0	0	0	(13,844)	11,416	11,416
0	Schools	63	0	0	0	0	63	63
0	Commissioning and Communities	140	0	0	0	0	140	140
0	Libraries	0	0	0	0	0	0	0
0	Total Families, Children & Wellbeing	25,735	0	70	0	(13,844)	11,961	11,961

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			
Reprofile	(8,821)	High Needs Provision Capital	The budget is to be reprofiled due to some uncertainty in the timing of programme of works. BHCC is committed to deliver High Needs Capital spend but this will need to be adjusted as the programme progresses, and the service has increased visibility of the programme scope and programme delivery.
Reprofile	(5,023)	New Pupil Places (Basic Need)	Budget to be reprofiled in line with spend over a number of years, particularly for Hove Park school, where majority of spend is expected in 2027/28. Some smaller works are also still expected.

Homes & Adult Social Care (excluding Housing Revenue Account) – Capital Budget Summary

Forecast Variance Month 2 £'000	Unit	Reported Budget Month 2 £'000	Reported at Other Committees £'000	New Schemes £'000	Variations £'000	Slippages & Reprofiles £'000	Reported Budget Month 5 £'000	Forecast Outturn Month 5 £'000
0	Adult Social Care	855	0	0	97	0	952	952
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	5,542	0	0	97	0	5,639	5,639

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	97	Knoll House Building Works	Variation to budget of less than £0.100m

City Operations – Capital Budget Summary

Forecast Variance Month 2 £'000	Unit	Reported Budget Month 2 £'000	Reported at Other Committees £'000	New Schemes £'000	Variations £'000	Slippages & Reprofiles £'000	Reported Budget Month 5 £'000	Forecast Outturn Month 5 £'000
0	City Infrastructure	45,435	6,416	0	(1,000)	0	50,851	50,851
0	Digital Innovation	3,780	0	0	0	0	3,780	3,780
0	Environment and Culture	14,472	0	53	(63)	0	14,462	14,462
0	Environmental Services	10,889	2,300	0	0	0	13,189	13,189
0	Place	11,813	0	0	1,400	0	13,213	13,213
0	Total City Operations	86,389	8,716	53	337	0	95,495	95,495

Details of Variation requests and explanations of significant Forecast Variances, Slippage or Reprofiles are given below:

Detail Type	Amount £'000	Project	Description
City Infrastructure			
Reported at Other Committees	6,416	A259 Kings Road Arches	Reported to Cabinet 12th Feb 2026
Variation	(1,000)	Valley Gardens Phase 3 (Local Transport Plan)	Project is due to finish this financial year, the 'surplus' generated was due to alternative funding that was found and utilised in previous years but was added as additional budget when it should have been switched with borrowing.
Variation	0	Various schemes	Variations to budget of less than £0.100m (budget being reallocated between schemes): (£0.174m) Brighton Marina to River Adur Works £0.174m A270 Wild Park Rainscape (£0.087m) Valley Gardens Phase 1&2 (LTP) £0.087m Valley Gardens Phase 3 (LTP)
Environment & Culture			
Variation	(63)	Various schemes	Variations to budget of less than £0.100m (£0.070m) The Level – Velo Café Building £0.007m Allotments

Appendix 5 – Capital Programme Performance

Detail Type	Amount £'000	Project	Description
Environmental Services			
Reported to Other Committees	2,300	Hollingdean Materials Recovery Facility (MRF) adaptations	Reported to Cabinet 19 th March 2026
Place			
Variation	1,400	Madeira Terraces Regeneration Project	Most of the additional cost relates to the more extensive testing and repair requirements for the structural cast iron, which has significantly extended the programme. Subsequent issues, principally relating to mechanical and electrical works have added further cost pressure to the project.

Central Hub - Capital Budget Summary

Forecast Variance Month 2 £'000	Unit	Reported Budget Month 2 £'000	Reported at Other Committees £'000	New Schemes £'000	Variations £'000	Slippages & Reprofiles £'000	Reported Budget Month 5 £'000	Forecast Outturn Month 5 £'000
0	Finance and Property	19,041	0	0	534	0	19,575	19,575
0	Welfare Revs & Business Support	2,250	366	0	0	0	2,616	2,616
0	People and Innovation	27	0	0	0	0	27	27
0	Total Central Hub	21,318	366	0	534	0	22,218	22,218

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	524	2025/26 Asbestos Programme	The budget increase will provide the resources required to address critical statutory asbestos compliance risks across the council's corporate property portfolio, including responding to regulatory enforcement action and reducing the risk of legal, financial and reputational consequences. Funding will support essential survey, remediation and asbestos compliance programmes, helping to establish a sustainable framework for managing asbestos, improving compliance levels and safeguard staff, residents, service users and visitors.
Variation	10	Hove Town Hall G101 Redesign	Variation to budget of less than £0.100m
Welfare Revs & Business Support			
Reported at Other Committees	366	Core Systems Review	Reported to Cabinet 17th September 2026 – Part 2

Housing Revenue Account (HRA) – Capital Budget Summary

Forecast Variance Month 2 £'000	Unit	Reported Budget Month 2 £'000	Reported at Other Committees £'000	New Schemes £'000	Variations £'000	Slippages & Reprofiles £'000	Reported Budget Month 5 £'000	Forecast Outturn Month 5 £'000	Forecast Variance Month 5 £'000
0	Housing People Services	40	0	0	0	0	40	40	0
0	Housing Regeneration	44,581	0	0	0	(1,200)	43,381	43,381	0
0	Homes & Investment	89,204	0	0	(250)	(5,050)	83,904	83,074	(830)
0	Total Homes & Adult Social Care - HRA	133,825	0	0	(250)	(6,250)	127,325	126,495	(830)

Details of Variation requests and explanations of significant Forecast Variances, Slippage or Reprofiles are given below:

Detail Type	Amount £'000	Project	Description
Housing Regeneration			
Reprofile	(1,200)	LPS Projects	Updated profile of spend in relation to consultancy costs for the LPS projects. This is due to redefining the briefs for the architects and consultants due to undertaking legal and technical due diligence. As such, the programme for appointment of consultants for the next stages has been re-profiled, resulting in reduced anticipated spend in 2026/27.
Homes & Investment			
Reprofile	(5,050)	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	(250)	Lifts Refurbishment	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	0	Various schemes	Variations to budget due to reallocation of budget between projects: (£0.950m) EICR Compliance Programme £0.605m Condensation & Damp Works £0.205m Minor Capital Works £0.140m Bathrooms

Appendix 5 – Capital Programme Performance

Detail Type	Amount £'000	Project	Description
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.
Variance	(130)	Main Entrance Doors	Updated forecast based off current programme of works.
Variance	(300)	Various schemes	Variances of £0.100m or less: (£0.100m) Citywide Loft Conversions & Extensions Projects (£0.100m) Structural Repairs (£0.100m) External Decorations & Repairs

Innovation & Transformation Portfolio Savings Dashboard – TBM5:

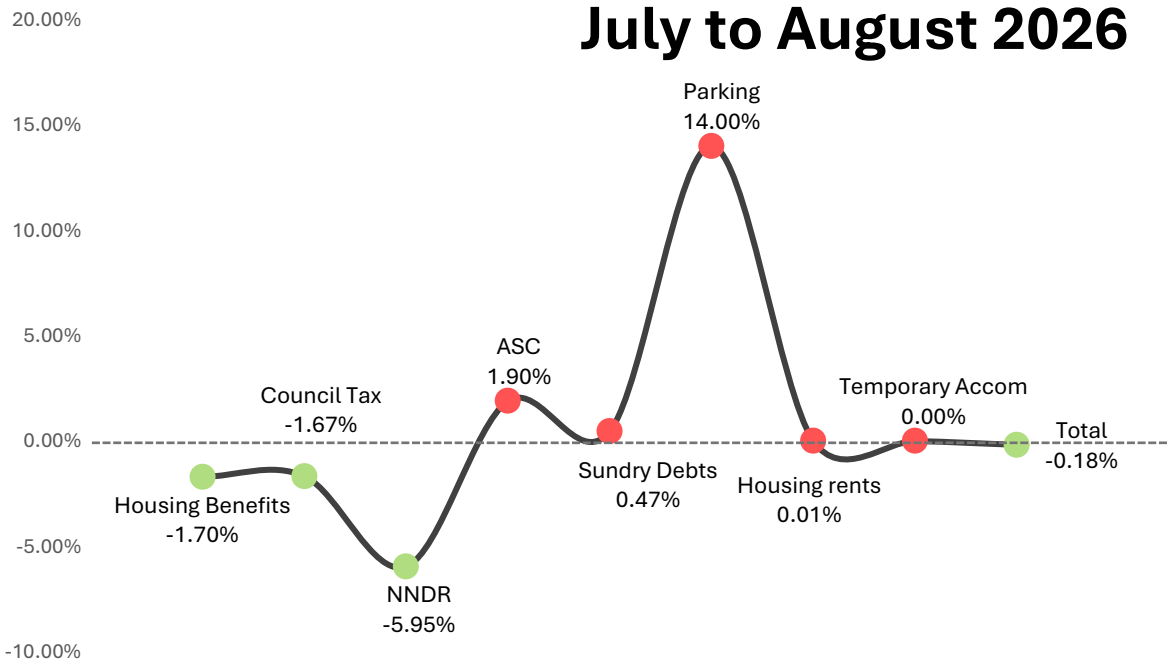
The Innovation & Transformation portfolio delivers £74.4m of the £93m savings target within the four-year Medium Term Financial Strategy. Savings performance is tracked through BGRAG ratings: Blue (delivered), Grey (in development), Red (high risk), Amber (managed risk), and Green (on track). The savings rating shown represents the dominant status within each programme. The delivery rating represents a balanced view of the Senior Responsible Owner of programme status and delivery confidence tracked through a RAG rating.

Strategic programme name	Savings target across MTFS	Savings BGRAG rating 2026/27	Delivery RAG rating	Key risks/issues/dependencies
Adult Social Care Transformation	£23.592m	Green	Amber	Risk remains around insufficient funding being available in relation to the care providers requesting fee uplifts. The Wellington House proposal will go to Cabinet with savings reduced.
Families, Children & Wellbeing Transformation	£6.875m	Blue	Amber	Reunification savings will not be delivered until later in the financial year. Fostering Plus savings are levelling out. Home to School Transport remains the main concern with more children in receipt of transport compared to last year.
Homes & Homelessness	£10.587m	Amber	Amber	The programme faces significant delivery risk from rising homelessness demand, the scale and pace of change required, and potential market constraints in securing sufficient accommodation. Additional risks relate to specialist support, including legal, procurement and DPIA resources needed to deliver multiple fast-paced projects.
Procurement, Commissioning & Contract Management	£4.000m	N/a	Red	Service is recruiting to significant vacancies, including Head of Procurement. Additional funding has been approved to add procurement and legal resource to the workstream which will also require significant input from services.
Income & Commercialisation	£10.213m	Green	Amber	Around £200k savings for 2026/27 are at risk. The programme is working hard to identify alternatives, including over-achievement in existing income, reviewing fees/charges and expediting future plans.
Asset Strategy (operational)	£3.023m	Amber	Red	Calculations are being revisited regarding available desk space at Hove Town Hall to feed into analysis to consolidate operational buildings. These will be informed by external consultant review.
Asset Strategy (not part of £74m)	£56.280m	Amber	Amber	Methodology for apportioning operational savings is being reviewed to ensure it is robust.
Organisational Transformation	£7.210m	Grey	Red	CLT support is required to ensure good engagement with the diagnostics exercise. Risks remain around double counting these savings with directorate savings. The 2026/27 savings target may need to be reprofiled into future years.
Digital Innovation & Technology	£8.914m	N/a	Amber	Lessons learned exercise to be undertaken into whether the three Turbocharging Innovation business cases could have been developed more quickly with the aim of identifying opportunities to accelerate the transition from innovation to implementation in future.

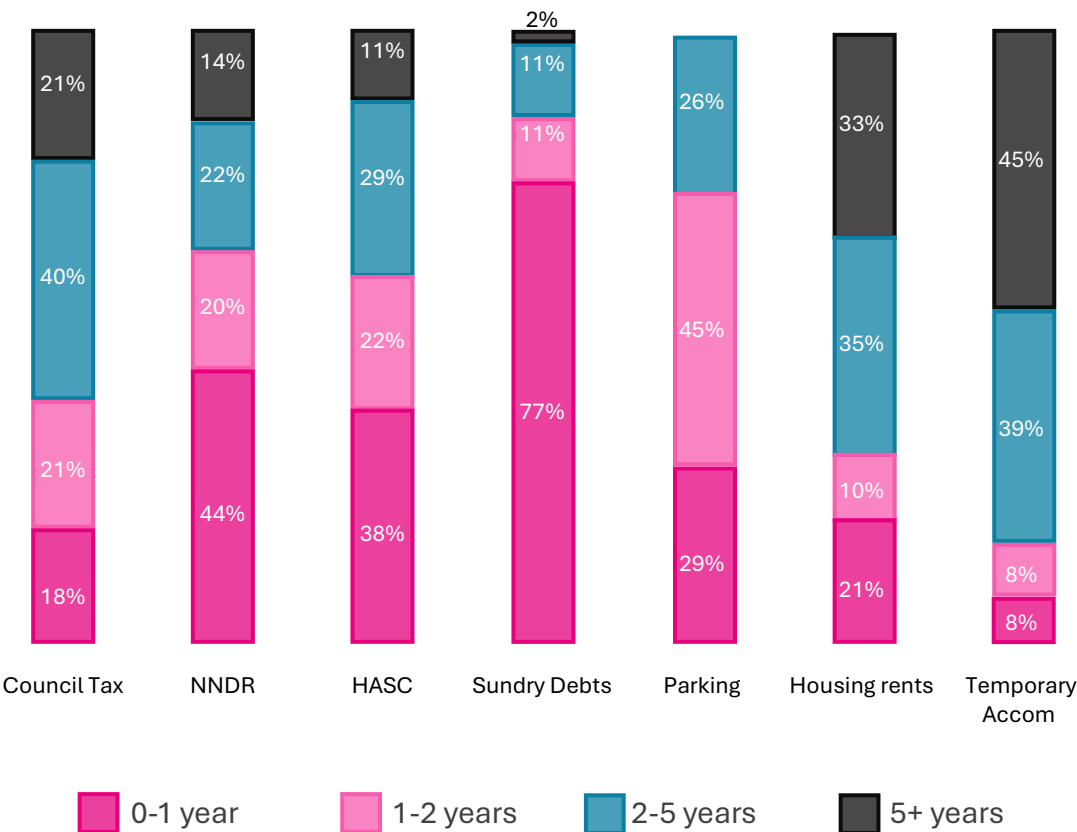
Age of debt in years (as of 31st August 2026)

HUB	Total debt	0 - 1	1 - 2	2 - 3	3 - 4	4 - 5	5 - 6	6 - 7	7+
¹ Housing Benefits	£5,854,896.00	-	-	-	-	-	-	-	-
Council Tax	£32,714,909.00	£5,994,571.00	£6,923,182.00	£6,516,159.00	£3,592,531.00	£2,785,822.00	£3,680,586.00	£1,051,288.00	£2,080,416.00
NNDR	£6,180,420.00	£2,723,145.00	£1,221,457.00	£707,418.00	£381,259.00	£231,055.00	£399,190.00	£91,915.00	£375,001.00
Adult Social Care	£17,859,318.00	£6,850,343.00	£3,992,633.00	£2,577,418.00	£1,680,429.00	£895,966.00	£580,689.00	£298,002.00	£1,039,242.00
Sundry Debts	£7,499,842.00	£5,749,975.00	£790,800.00	£629,030.00	£116,045.00	£97,864.00	£58,413.00	£165,156.00	£-95,728.00
Parking	£4,486,494.00	£1,291,582.00	£2,006,297.00	£651,717.00	£537,108.00	£-210.00			
¹ Leaseholders	£3,603,642.00	-	-	-	-	-	-	-	-
Housing rents	£7,413,284.00	£1,536,024.00	£777,793.00	£927,430.00	£967,181.00	£722,729.00	£230,373.00	£159,679.00	£2,092,075.00
Temporary Accom	£3,175,362.00	£252,315.00	£254,170.00	£456,405.00	£312,453.00	£479,045.00	£279,095.00	£217,498.00	£924,381.00
Total	£88,788,167.00	£30,346,962.00	£15,993,198.00	£12,479,345.00	£7,589,274.00	£5,214,115.00	£5,228,637.00	£840,335.00	£7,559,776.00

Percentage change in debt by hub:
July to August 2026



Age of debt by service



¹ A breakdown of debt by age for Benefits & Leaseholders is not currently available.

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