Brighton & Hove City Council

Cabinet

Date: **12 November 2026**

Time: **10.30am**

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

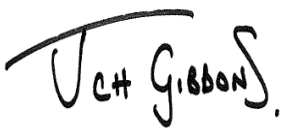
Members: **Councillors:** Sankey (Chair), Taylor (Deputy Chair), Alexander, Allen, Daniel, McGregor, Muten, Robins, Rowkins and Williams

Contact: **Raymond Bruce-Cathline**
Democratic Services Manager
01273 29 1354
raymond.bruce-cathline@brighton-hove.gov.uk

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Chief Executive
Hove Town Hall
Norton Road
Hove BN3 3BQ

Date of Publication - Wednesday, 4 November 2026

AGENDA

Part One **Page**

80 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

81 MINUTES **7 - 16**

To consider the minutes of the meeting held on 15th October 2026.

82 CHAIR'S COMMUNICATIONS

83 CALL OVER

84 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 6th November 2026.

(c) **Deputations:**
To receive any deputations submitted by the due date of 10am on 2nd November 2026.

85 ISSUES RAISED BY MEMBERS

To consider the following matters raised by Members:

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

86 MATTERS REFERRED TO THE EXECUTIVE

87 REPRESENTATIONS FROM OPPOSITION MEMBERS

88 BRIGHTON MARINA TO RIVER ADUR FLOOD AND COASTAL EROSION RISK MANAGEMENT (FCERM) SCHEME **17 - 58**

Contact Officer: *Steven Parker*
Ward Affected: *All Wards*

89 MANAGING THE TRANSPORT NETWORK **59 - 120**

Contact Officer: *Tracy Beverley*
Ward Affected: *All Wards*

90 SCHOOL ADMISSION ARRANGEMENTS 2028-29 **121 - 166**

Contact Officer: *Richard Barker*
Ward Affected: *All Wards*

91 HOMES FOR EVERYONE: HOMELESSNESS AND ROUGH SLEEPING LOCAL DELIVERY PLAN **167 - 322**

Contact Officer: *Lucie Spicer*
Ward Affected: *All Wards*

92 EXPANDING COUNCIL CONTROLLED TEMPORARY ACCOMMODATION **323 - 334**

Contact Officer: *Diane Hughes*
Ward Affected: *All Wards*

93 TARGETED BUDGET MANAGEMENT (TBM) 2026/27 MONTH 6 (SEPTEMBER) **335 - 358**

Contact Officer: *Elizabeth Griffiths*
Ward Affected: *All Wards*

94 LARGE PANEL SYSTEM HOUSING MASTERPLAN AND LAND ASSEMBLY **359 - 420**

Contact Officer: *Paul Dalton*
Ward Affected: *All Wards*

PART TWO

95 LARGE PANEL SYSTEM HOUSING MASTERPLAN AND LAND ASSEMBLY (EXEMPT CATEGORY 3) **421 - 428**

Contact Officer: *Paul Dalton*
Ward Affected: *All Wards*

96 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

10.30am 15 OCTOBER 2026

COUNCIL CHAMBER, HOVE TOWN HALL

MINUTES

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

Other Members present: Councillor Sheard

PART ONE

63 PROCEDURAL BUSINESS

63.1 The Chair welcomed those present and advised that the meeting was being webcast. Apologies for in-person attendance were received from Councillor Williams, who joined remotely.

63.2 Councillor Robins declared an interest in Item 56 Royal Pavilion Gardens Restoration Project.

63.3 Cabinet agreed that the reports listed in Part Two of the agenda should remain exempt and that the press and public would be excluded if those reports were considered in private.

64 MINUTES

64.1 RESOLVED – That the minutes of the previous meeting held on 17 September 2026 be approved as a correct record.

65 CHAIR'S COMMUNICATIONS

65.1 The Chair highlighted the Council's progress against its environmental priorities, including a reported 7% increase in the city's recycling rate, proposals for 500 additional electric vehicle charging points, the development of a heat-pump training campus in East Brighton, progress with Valley Gardens Phase 3 and the A259 active travel scheme, and enhanced street cleaning and neighbourhood maintenance.

65.2 The Chair referred to support for residents facing cost-of-living pressures, including free bus travel for care leavers, the £1 Whitehawk bus fare initiative, a planned £2 cap on single bus fares from January, expanded free-school-meal entitlement and additional government funding for adult social care, homelessness prevention and rough sleeping.

65.3 The Chair marked Black History Month, referring to events involving the Council's Black and Minority Ethnic Workers Forum, the contribution of Black residents and staff, and the civic leadership programme with Operation Black Vote. The Chair then outlined the principal business to be considered, comprising the Royal Pavilion Gardens, advertising and sponsorship, Black Rock, the street lighting contract and the Month 5 budget monitoring report.

66 CALL OVER

66.1 All items on the agenda were reserved for discussion.

67 PUBLIC INVOLVEMENT

(a) Petitions

67.1 The Chair reported receipt of a petition containing 51 signatures requesting that the Council review and reverse changes to parking restrictions on Hallyburton Road, Hove. As the petitioner, Cate Grundy, was unable to attend, Cabinet agreed that a written response would be sent.

(b) Public Questions

67.2 There was one public question.

1. Daniel Harris - Targeted Budget Management (TBM) 2026/27 Month 5 (August)

Daniel Harris asked: Would the Council explain Housing Revenue Account expenditure on Large Panel System (LPS) consultancy, including £1.2m of reprofiling, fees, procurement and resident consultation; provide details of the £10.587m Homes and Homelessness savings programme; and identify operational procurement responsibility and safeguards in light of staffing vacancies?

Reply from Councillor Taylor (on behalf of Councillor Williams): The Housing Revenue Account was ring-fenced for housing landlord functions. The LPS budget had been approved in March and July 2025, and the £1.2m reprofiling changed the anticipated timing rather than the total approved budget. The Council's procurement controls continued to apply notwithstanding vacancies and specialist appointments were subject to applicable procurement legislation and governance arrangements. Councillor Taylor added that tenant and resident engagement sessions in autumn and winter 2026 would help inform the 2027/28 HRA budget and that the Homes and Homelessness savings programme was detailed in the Budget report approved on 26 February 2026.

(c) Deputations

67.3 No deputations were received.

68 ISSUES RAISED BY MEMBERS

68.1 The Chair reported that 12 written Member questions had been received and that 15 minutes had been allocated to the item.

68.2 The following questions were put and answered at the meeting:

1. Councillor West - Advertising and Sponsorship
Councillor West asked: Would the Council ensure that increased advertising on council-owned assets did not adversely affect residents' mental health and wellbeing, in light of the intrusive character of outdoor advertising and restrictions adopted by other councils?

Reply from Councillor Allen: The proposed policy contained public health, ethical and regulatory safeguards, including compliance with advertising standards and restrictions on harmful advertising categories. It was underpinned by governance, approval and review arrangements.

2. Councillor Sykes - Royal Pavilion Gardens Restoration Project
Councillor Sykes asked: What was the status of the proposal for a sculpture commemorating Hindu, Muslim and Sikh soldiers who served in the First World War, following the recommendation of the Heritage Task and Finish Group?

Reply from Councillor McGregor: Officers had brought together the Royal Pavilion & Museums Trust and the community group to discuss the proposal. A planning application had been deferred while the Gardens restoration was progressed, and the group intended to undertake further development and fundraising in 2027.

3. Councillor Sykes - Targeted Budget Management (TBM) 2026/27 Month 5 (August)
Councillor Sykes asked: Was the Administration considering requesting additional Exceptional Financial Support (EFS) beyond the £45m already requested?

Reply from Councillor Taylor: The report concerned the existing £45m request, of which £15m had been approved and the further £30m remained subject to approval. He did not rule out a future request if necessary to bridge financial pressures pending wider reforms.

4. Councillor Sykes - Targeted Budget Management (TBM) 2026/27 Month 5 (August)
Councillor Sykes asked: What was the balance of EFS drawn down against successful asset disposals and the amount on which the Council was effectively paying interest?

Reply from Councillor Taylor: The £15m of EFS approved was apportioned to the collection fund deficit, reserves, contingency and budget shortfall. Any interest attributable to EFS-related borrowing could only be calculated at outturn, based on realised capital receipts and the final budget position.

5. Councillor Strong - Black Rock Future Vision and Meanwhile Use
Councillor Strong asked: Would the sustainability assessment thoroughly address carbon impacts during both construction and operation, and consider mode-share targets to avoid increased car use on Madeira Drive?

Reply from Councillor Taylor: Sustainability and sustainable travel would be assessed through the detailed design and planning process, including potential traffic impacts on Madeira Drive and appropriate measures and targets relating to travel choices and car use.

6. Councillor McLeay - Royal Pavilion Gardens Restoration Project
Councillor McLeay asked: Would an alternative public ice rink be provided in Brighton & Hove in winter 2026/27 while construction works prevented the traditional rink returning to Pavilion Gardens?

Reply from Councillor McGregor: It had not been possible to identify and secure a suitable location for winter 2026, despite discussions with the organisers. The ice rink was expected to return for Christmas 2027 at Old Steine.

68.2 The Chair advised that a written question from Councillor Shanks had been received by the deadline but had not been seen by officers in time for a considered reply. Cabinet agreed that a written response would be provided.

69 MATTERS REFERRED TO THE EXECUTIVE

69.1 No matters were reported as having been referred to Cabinet for consideration.

70 REPRESENTATIONS FROM OPPOSITION MEMBERS

70.1 Councillor Sykes made a representation on Item 60, Targeted Budget Management (TBM) 2026/27 Month 5 (August). He criticised the scale and trajectory of the forecast General Fund overspend and identified additional risks, compared the Council's reported position with other authorities, questioned financial control and delivery of savings, and said the report would be called in for scrutiny. He invited Cabinet to provide assurance on the financial position and the response being taken.

71 ROYAL PAVILION GARDENS RESTORATION PROJECT

71.1 In line with his declaration of interest, Councillor Robins left the chamber before the item was introduced.

71.2 Cabinet considered the report seeking approval of a revised project budget and authority to enter into the principal restoration works contract for the Royal Pavilion Gardens. Councillor McGregor reported that the Gardens were on Historic

England's Heritage at Risk Register and that the project followed long-standing partnership work with the Royal Pavilion & Museums Trust. The works would restore historic features, improve biodiversity and accessibility, provide better public toilets including a Changing Places facility, and support education, volunteering and safer use of the site.

71.3 Councillor McGregor highlighted the support of external partners and funders, including the National Lottery Heritage Fund and Historic England. She advised that an Historic England grant application had received approval for a sum just under £500,000. The proposed increase of £1.600m would take the total project budget to £8.038m, with no additional direct Council contribution proposed. The safety benefits included proposals for marshals at higher-risk times and associated support for vulnerable people.

71.4 Councillor Rowkins welcomed the proposals but sought reassurance about the impact of construction inflation on future costs. Councillor McGregor said the intention was to progress the works without delay and expressed confidence in delivery within the available budget and timetable. Councillor Muten highlighted the connection with Valley Gardens Phase 3 and the opportunity to improve views of the Pavilion. Councillor Allen referred to improvements in safety and the public realm on New Road, including better visibility and the proposed boundary treatment.

71.5 The Chair thanked officers, the Royal Pavilion & Museums Trust and external funders and observed that the proposed refurbishment of the public toilets could reduce ongoing Council costs.Cabinet agreed the recommendations in the report.

RESOLVED –

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) 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.

72 ADVERTISING AND SPONSORSHIP

72.1 Cabinet considered a report proposing an overarching Advertising and Sponsorship Policy. Councillor Allen explained that the Council sought a coordinated and proactive framework to generate income from appropriate use of its buildings, public spaces, publications and other assets, whilst maintaining a clear approvals framework and ethical restrictions. The proposed exclusions included advertising related to fossil fuel production, gambling, tobacco, weapons, exploitative financial products and harmful or discriminatory content, alongside existing restrictions on unhealthy food advertising.

72.2 Councillor Taylor supported opportunities to raise revenue to protect services and emphasised the need to assess commercial income opportunities alongside

financial pressures. In the ensuing discussion, Members welcomed an approach that could generate income without compromising Council values and recognised the importance of ensuring advertisements met regulatory and public-health requirements.

72.3 Members discussed policy safeguards and the Council's ability to scrutinise individual proposals and remove unsuitable advertising. Councillor Robins emphasised case-by-case assessment. The Chair welcomed the proposed gambling advertising restrictions and the intention to join the Coalition to End Gambling Ads. Cabinet agreed the recommendations.

RESOLVED –

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) 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.

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.

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.

73 BLACK ROCK FUTURE VISION AND MEANWHILE USE

73.1 Cabinet considered the Black Rock Future Vision and proposed meanwhile use. Councillor Taylor explained that the Council sought to bring activity to a prominent but underused seafront site, while retaining a longer-term ambition for major regeneration of the eastern seafront. The short-term arrangement was intended to attract private investment and generate rent without requiring speculative Council capital expenditure.

73.2 Members welcomed the prospect of activity at Black Rock and considered how the site could link with Madeira Drive, the Marina, other seafront destinations and the wider cultural and leisure offer. Discussion covered transport, the existing parking provision, cycling, public transport connections and how the longer-term vision would be developed. Members also reflected on the importance of retaining flexibility for future regeneration.

73.3 The Chair sought assurances about affordability, accessibility and community benefit from the proposed meanwhile use. Councillor Taylor explained that, although the operator would charge for some activities, the Council would seek suitable affordable and community offers through negotiations, including opportunities for schools and local residents. Accessibility, parking and travel

arrangements would be considered through detailed design and the planning process. Cabinet agreed the recommendations.

RESOLVED –

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) 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.

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.

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.

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.

74 STREETLIGHTING CONTRACT EXTENSION

74.1 Cabinet considered the proposal to extend and vary its existing street-lighting contract. Councillor Muten explained that the extension would maintain continuity of this essential service while the Council developed the specification and procurement for its longer-term arrangements. He emphasised the importance of reliable lighting for safety, accessibility and evening journeys.

74.2 Councillor Robins welcomed the responsiveness of the street lighting service and emphasised the value of a well-run contract. Members discussed the need for robust key performance indicators, efficient fault reporting and timely repairs, energy-efficient lighting and appropriate standards in conservation areas and residential neighbourhoods. Councillor Allen referred to the responsiveness of the lighting team and the differing requirements of historic and modern street lighting; other Members stressed that reliable lighting helped people feel safe using the public realm after dark.

74.3 The Chair supported using the extension period to develop a robust specification for the next long-term contract, highlighting the importance of lighting to personal safety, particularly for women travelling at night, and encouraged engagement with relevant Cabinet Members in that work. Cabinet agreed the recommendations.

RESOLVED –

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) 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.

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

75.1 Cabinet considered the Targeted Budget Management report for Month 5 (August) 2026/27. Councillor Taylor highlighted a potential General Fund forecast overspend of £23.835m, together with £18.862m of additional identified risks outside that forecast. He reported that 71% of service budget savings were being delivered, but that these were being overtaken by increases in demand, complexity and cost, particularly in adult social care, children's services, homelessness and special educational needs, including increased Education, Health and Care Plans and associated transport costs.

75.2 Responding to the representation by Councillor Sykes, Councillor Taylor said that comparisons between authorities required consideration of differing local circumstances and budget assumptions, including use of EFS. He referred to housing costs and temporary accommodation pressures in Brighton & Hove and argued for a medium-term programme of transformation that would protect valued frontline and non-statutory services rather than relying on immediate service closures. He said he would provide Councillor Sykes with a written response to the comparative figures raised.

75.3 Councillor Muten supported a medium-term approach and asked how the city's attractiveness and housing market affected service costs. Councillor Taylor explained that housing supply constraints, the cost of property and wages, and demand for accommodation and care made local comparisons difficult. The Chair outlined regular financial monitoring by Members and officers, the need to accelerate transformation savings, challenges with forecast parking income and growing demand for Education, Health and Care Plans. The Chair stressed that financial pressures were being closely monitored and that national reforms and additional funding would be important to a sustainable position. Cabinet agreed the report recommendations.

RESOLVED –

1) Cabinet notes the forecast risk position for the General Fund, which indicates a potential forecast overspend risk of £23.835m

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.

3) Cabinet notes the forecast overspend risk for the separate Housing Revenue Account (HRA), which is an overspend of £1.145m.

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.

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.

6) Cabinet notes the Treasury Management update at Appendix 3.

7) Cabinet approves the addition of new projects to the capital programme totalling £0.357m as set out in Appendix 4.

8) Cabinet approves the capital budget variations of £0.717m and reprofiling of £20.094m set out in Appendix 5.

9) Cabinet notes the forecast position on the Capital Programme at Appendix 5.

10) Cabinet notes the aged debt position shown at Appendix 7.

PART TWO

76 BLACK ROCK FUTURE VISION AND MEANWHILE USE (EXEMPT CATEGORY 3)

76.1 As per Part One minutes.

77 STREETLIGHTING CONTRACT EXTENSION (EXEMPT CATEGORIES 3 AND 5)

77.1 As per Part One minutes

78 PART TWO MINUTES OF THE PREVIOUS MEETING

RESOLVED –

That the Part Two minutes of the previous meeting be approved as a correct record.

79 PART TWO PROCEEDINGS

RESOLVED –

That the items listed in Part Two remain exempt from disclosure to the press and public.

Meeting concluded at 12:12pm

Signed _____ Chair

Dated this _____ day of _____ 2026

Brighton & Hove City Council

Cabinet Agenda Item 88

Subject: **Brighton Marina to River Adur Flood and Coastal Erosion Risk Management (FCERM) Scheme**

Date of meeting: **Thursday, 12 November 2026**

Report of: **Cabinet Member for Transport & City Infrastructure**

Lead Officer: **Name: Corporate Director- Operations**

Contact Officer: **Name: Steven Parker**

Email: Steven.parker@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 Council Plan commits Brighton & Hove City Council to creating a sustainable city, protecting critical infrastructure, responding to climate change and supporting a prosperous local economy. Investment in flood and coastal erosion risk management infrastructure contributes directly to these priorities by safeguarding communities, businesses, transport networks and environmental assets from the increasing risks associated with climate change.

1.2 The Brighton Marina to River Adur Flood and Coastal Erosion Risk Management (FCERM) Scheme ("the Scheme") is a major partnership programme designed to improve coastal resilience and reduce flood and erosion risk along a significant stretch of the Sussex coastline extending from Brighton Marina to the mouth of the River Adur.

1.3 Brighton & Hove City Council acts as Lead Authority for the Scheme in partnership with Adur & Worthing Councils, Shoreham Port Authority and the Environment Agency. Phase 1 of the Scheme has substantially been completed and Phase 2 construction works within Brighton & Hove are progressing on programme. This report seeks approval to commence procurement and delivery of Phase 3 of the Scheme, which comprises works

located primarily within Shoreham Port and the Adur & Worthing administrative area.

1.4 The report also seeks approval to revise the Council's previously approved capital contribution from £11.0 million to £4.5 million following confirmation of additional Environment Agency Grant in Aid funding and a review of the overall funding strategy for the Scheme.

2. Recommendations

2.1 That Cabinet approves the commencement of an open procurement process for Phase 3 construction works of the Scheme with an estimated contract value of approximately £13.5 million, with the procurement undertaken by Brighton & Hove City Council in its capacity as Lead Authority for the Scheme and in consultation with the Cabinet Member for Transport and City Infrastructure.

2.2 That Cabinet confirms Brighton and Hove City Council's continuing role as Lead Authority for the Scheme and delegates authority to the Corporate Director, City Operations, in consultation with the Cabinet Member for Transport and City Infrastructure, to:

2.2.1 take all steps necessary to enter into any partnership, funding or delivery agreements required to facilitate Phase 3 and complete the Scheme.

2.2.2 evaluate tenders and award the Phase 3 construction contract; and,

2.2.3 enter into any associated contracts, warranties, deeds and ancillary documentation.

2.3 That Cabinet approves the revision of Brighton & Hove City Council's capital contribution to the Scheme from £11 million to £4.5 million, reflecting updated funding arrangements and increased Environment Agency Grant in Aid allocations.

2.4 That Cabinet approves an increase in capital budget of £9.8m funded by Grant in Aid and external contributions from Shoreham Port Authority.

3. Context and background information

3.1 Brighton & Hove City Council is both a Coast Protection Authority under the Coast Protection Act 1949 and a Lead Local Flood Authority under the Flood and Water Management Act 2010. The Brighton Marina to River Adur Flood and Coastal Erosion Risk Management (FCERM) Scheme forms part of the national Flood and Coastal Erosion Risk Management Strategy and has been developed to reduce flood and coastal erosion risk along the vulnerable stretch of coastline between Brighton Marina and the mouth of the River Adur.

3.2 Brighton & Hove City Council acts as Lead Authority for the Scheme and works in partnership with Adur & Worthing Councils, Shoreham Port

Authority and the Environment Agency. The partnership was established to deliver a coordinated approach to coastal resilience, secure external funding and achieve value for money through joint planning, design and delivery across administrative boundaries. Each partner remains responsible for funding their agreed works to the Scheme and in this regard Brighton and Hove City Council and Shoreham Port Authority intend to enter into a contract for BHCC to receive payments in respect of Area 2A and 2B (Phase 3) to cover all costs associated with the tendered contract and final value. This would be prior to any notification to the appointed winning contractor.

3.3 This was formally recognised within a Memorandum of Understanding (MoU) signed by the Stakeholders in April 2016 and served both a commitment and outline in approach to governance, procurement and delivery in a spirt of mutual trust and cooperation to achieve the Schemes objectives.

3.4 The Scheme will improve resilience to coastal erosion, storm events and rising sea levels through a combination of beach management, improvements to existing sea defences, construction of rock revetments and associated infrastructure works. The completed Scheme will provide long-term protection to communities, businesses, transport infrastructure, utility assets and environmental resources along this section of the Sussex coastline, supporting adaptation to climate change and reducing the future costs of coastal erosion and flooding.

3.5 The Scheme comprises three phases. Phase 1 included development of the Outline Business Case, environmental assessments, planning approvals, licences, detailed design, biodiversity mitigation measures and enabling works, together with construction activities at Basin Road and the Lagoon. Phase 2 comprises coastal defence improvements at Kings Esplanade and Southwick Beach and is currently progressing on programme, with completion anticipated in 2026.

3.6 Phase 3 represents the final principal construction phase of the Scheme and is located primarily within Shoreham Port and the administrative area of Adur & Worthing Councils. The works include repairs and enhancement of existing sea wall structures, construction of new rock revetments, improvements to coastal resilience infrastructure and reinstatement of public access routes. These assets provide protection to nationally significant port infrastructure, transport connections, utility infrastructure, employment land and surrounding communities.

3.7 In April 2025 Cabinet approved the funding strategy for the Scheme based on an overall Scheme value of £41.5 million, including an anticipated Brighton & Hove City Council capital contribution of £11.0 million. Following an updated Outline Business Case (Appendix 3) and successful negotiations with the Environment Agency, Grant in Aid funding has increased from £14.0 million to £25.9 million, reducing the Council's forecast capital contribution to £4.5 million and significantly improving the affordability of the Scheme. The budget for the final phase now requires approval.

3.8 The current approved Scheme budget is £26.5m. It is anticipated that the final costs of the scheme will be £36.5m with the latest forecast indicating that delivery remains achievable within that funding envelope while retaining an appropriate contingency provision of £1.5m. Cabinet are therefore being asked to approve the final element of the capital budget of £9.8m to bring the total to £36.5m. Table 1 below provides an outline of the financial position of the programme and the movements in budget and funding.

Table 1 - Financial Position of the scheme (July 2026 OBC update)	**Total Project with updated funding proposals (£'000)**	**Approved by Cabinet to date (£'000)**	**Requires Cabinet Approval (£'000)**
Scheme costs	36,500	26,700	9,800
Funded by			-
BHCC Borrowing	4,500	11,000	(6,500)
External Contribution*	6,100	1,700	4,400
EA / DEFRA Flood Defence Grant in Aid	25,900	14,000	11,900
Total original funding	**36,500**	**26,700**	**9,800**
Revised funding			-
Expenditure and commitments			-
Spend to 31 March 2026	9,300	9,300	-
Spend and commitments in 2026/27	11,900	11,900	-
Total spend and commitments	21,200	21,200	-
Funding applied to spend and commitments			-
BHCC Borrowing	3,300	3,300	-
External Contributions	2,600	2,600	-
Grant	20,600	20,600	-
Total funding applied	26,500	26,500	-
Remaining cost to be incurred	**15,300**	**5,500**	**9,800**

*Subject to agreement and final costs

3.9 The purpose of this report is therefore to seek authority to undertake procurement and delivery of Phase 3 and to approve the revised funding profile reflecting the increased Environment Agency contribution and reduced borrowing requirement.

4. Analysis and consideration of alternative options

4.1 The option of not proceeding with Phase 3 has been considered and is not recommended. The Phase 3 works form the final principal construction phase of the Brighton Marina to River Adur FCERM Scheme and are required to complete the approved programme of coastal defence improvements.

4.2 Failure to proceed would increase the risk of coastal erosion, flooding and deterioration of existing defence assets affecting Shoreham Port, associated utility infrastructure, transport links, employment land, public access routes and surrounding communities. In addition to increasing environmental and economic risks, non-delivery would reduce the overall effectiveness and benefits of the wider Scheme.

4.3 The Council has acted as Lead Authority for the Scheme since its inception and has worked collaboratively with Adur & Worthing Councils, Shoreham Port Authority and the Environment Agency to secure funding, complete design development and obtain the necessary approvals. Failure to complete the final phase could damage strategic partnerships and may adversely affect future opportunities to secure external funding for flood and coastal resilience projects.

4.4 Alternative procurement routes were considered. An Open Tender process is recommended as it provides the greatest level of market competition, transparency and value for money whilst ensuring compliance with the Procurement Act 2023 and the Council's Contract Standing Orders. The contract has been prepared by engineering consultancy Mott MacDonald and approved by Legal Services.

4.5 The Council's Procurement Team has been consulted on the proposed procurement strategy and has confirmed that sufficient capacity is available to support the procurement process and contract award timetable. Technical, project management and specialist support arrangements are also in place to support successful delivery of Phase 3.

5. Community engagement and consultation

5.1 The wider Scheme and proposals to both the Kings Esplanade beaches and Shoreham Port Authority sea walls, have been extensively promoted both internally and externally to all stakeholders over the last 6 years including; press releases, internal presentations to councillors and wider directorates, public open sessions and road show exhibitions.

5.2 The April 2025 the Cabinet report confirmed there had been extensive public engagement sessions over the previous years. In recent times a large Public Engagement session was held at the King Alfred Leisure centre in April 2026 to provide a Phase 2 (and 3) update as the works progressed. This was extremely well attended (about 70 residents and business owners and interested parties) and included all the senior deliver partners who gave presentations, Jane Miller OBE (the first female High Commissioner to Guyana), local ward councillors and the cabinet member for Transport and City Infrastructure Cllr Trevor Muten.

5.3 Phase 2 works have extensively engaged with the local community, stakeholders and interested parties and this has remained a key component of this FCERM Scheme throughout. Furthermore, during Phase 2 a web site was created with access via a QR code giving real-time information on what,

where and when with both videos and oversite of the activities to be completed. In addition, an on-site Public Liaison Officer was present 3 days a week and also provided a drop in kiosk, dedicated email and phone contact details and regular engagement sessions with Schools and other social value elements. Please see Appendix No 1 for a full list of all social value activities.

5.4 Phase 3 does not alter the scope or nature of the approved Scheme and therefore no additional consultation is required in relation to the recommendations set out in this report beyond what has already taken place. However, the team will continue with both new public engagement sessions for Phase 3 as well as continued social value delivery as part of our wider commitment to the community and the City corporate Plan.

6. Financial implications

6.1 The current approved capital budget for the Brighton Marina to River Adur Flood and Coastal Erosion Risk Management Scheme is £26.7m, this is included in the capital programme and is for costs from inception of the project up to 31 March 2026. The final cost estimate to complete the whole project is £36.5m. As per recommendation 2.4, Cabinet are being recommended to approve a budget increase of £9.8 million to be included within the capital programme, funded by additional Environment Agency Grant in Aid and an increase in external partner contributions.

6.2 The updated funding profile for the project includes £25.9m (increased from £14.0m) of approved Environment Agency Grant in Aid and £6.1m of external contributions. The external contributions are subject to the finalisation of the relevant funding agreements being agreed and final scheme costs. This increase in funding enables the council's contribution to be reduced from the previously approved £11.0m to £4.5m.

6.3 The £6.5m reduction in council borrowing represents a significant improvement in the affordability of the Scheme, reducing the council's exposure to future borrowing costs, including interest and Minimum Revenue Provision charges. The cost of financing the £4.5m is estimated to be £0.370m, using an interest rate of 6.56% (24 September 2026 PWLB rates less 0.2 basis points) over a 25-year asset life. Actual interest rates will be subject to the timing of the borrowing and in line with the Council's Treasury Management strategy. Within the overall City Infrastructure budgets there is headroom within the service borrowing budget lines to fund this expenditure, however this does reduce what is available for other projects in the pipeline which are likely to require pressure funding. This value is unknown and requires business cases to be developed.

6.4 The previously approved borrowing provision included an allowance for scheme risk, uncertainty over external funding and a potential loan facility for Shoreham Port Authority. Following approval of the updated Outline

Business Case and confirmation of the increased Environment Agency funding, this level of council provision is no longer required. Shoreham Port Authority remains responsible for funding works relating to its assets and land, with its contribution to be secured through other funding agreements as opposed to a loan directly from the council.

6.5 The risks associated with the project are in an increase in costs over and above the £1.5m contingency allowed for in the latest budget estimate. As final element of the works relates to assets the council does not own an agreement will need to be sought with Shoreham Port Authority with regards the funding of the cost overrun so that the councils financial position is not worsened as a result.

6.6 Should any cost overrun relate to a council asset this would need to be funded by council resources. At the rates assumed in paragraph 6.3 for every £0.100m worth of borrowing the revenue impact will be £0.010m. As outlined in the report the project is expected to be managed within the latest approved budget which includes £1.5m of contingency (10% of the remaining costs). Robust financial monitoring and reporting will therefore be required throughout procurement and delivery of the final phase.

Craig Garoghan Date consulted: (24/09/26)

7. Legal implications

7.1 The Council has the power to take forward the arrangements contemplated by this report under the general power of competence set out at 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. No such limitation has been identified as preventing the Council from implementing the recommendations in this report.

7.2 The Council is able to act as Lead Authority in relation to works on land on neighbouring coastlines because it is complying with statutory requirements, relevant consents, and agreements, primarily under the Coast Protection Act 1949, the Flood and Water Management Act 2010, and the Marine and Coastal Access Act 2009. Such requirements include that the purpose of the work should be to manage coastal erosion risk in the authority's own area, as it is in relation to this project. The Coast Protection Act also makes clear that an authority may enter into agreements with other authorities for the carrying out of such works, The Marine and Coastal Access Act 2009 also provides for joint discharge of functions and for local authorities to act together or on each other's behalf in the management of the marine and coastal environment (c. 23 s. 20).

7.3 In proceeding with the procurement and award of contract contemplated by this report and in accordance with recommendations 2.1 and 2.2, the Council is required to comply with the Procurement Act 2023 and associated regulations, together with the Council's Contract Standing Orders.

7.4 As Lead Authority for the FCERM Scheme, BHCC will enter into an NEC4 Engineering and Construction Contract with the successful bidder for the delivery of the works. BHCC will also enter into a separate funding agreement with Shoreham Port Authority (SPA) through which SPA will contribute its agreed share of the costs of the works. The funding agreement will include appropriate provisions governing the timing and payment of SPA's contribution, together with provisions protecting BHCC in the event of late payment or default by SPA.

Jane Woods Date consulted: 29 September 2026

8. Risk implications

8.1 The principal risks associated with the Scheme are summarised below:

Risk	Impact	Mitigation
Failure to proceed with Phase 3	Increased flood and erosion risk	Delivery of approved Scheme
Loss of external funding	Financial and reputational impacts	Continued programme delivery
Procurement delays	Increased costs and programme slippage	Early procurement and project management
Construction inflation	Increased costs	Budget controls and contingency management
Climate change impacts	Increased exposure to flooding and erosion	Climate-adapted infrastructure design
Failure of existing assets	Threat to infrastructure and services	Planned replacement and enhancement works

8.2 Failure to deliver the proposed works would increase the environmental, economic and social risks associated with coastal erosion and flooding. There is also a risk that failure to proceed could adversely affect future funding opportunities and strategic relationships with funding and delivery partners.

9. Equalities implications

9.1 Equality Analysis has been carried out through a project screening process to give due consideration to equality, diversion and inclusion. This was submitted as part of the OBC and the Council's diversity team has been consulted. A copy is attached in Appendix 2. This will remain under review.

9.2 Establishing relevance was determined around restrictions to any particular group (protected and others) regarding the sea defence activities within the Scheme.

9.3 Due to the nature of the improvements and the fact no new amenities are being constructed (replacement and repair only) the overall implications are neutral.

10. Sustainability implications

10.1 The project has both net zero and biodiversity at its heart in respect of contributing to the wellbeing of the city.

10.2 Energy: where possible reduced emissions will be created using biofuels where no alternative to hydrocarbons exists. Consumption will be reduced wherever possible and clean energy use will be encouraged across the Scheme utilizing a mix of clean energy options.

10.3 Travel & Transport: the team are committed to keeping activities local to reduce travel and transport requirements and to also encourage shared services where possible.

10.4 Sustainable procurement: we are encouraging through our key qualification questions the need for suppliers to provide evidence and examples of their commitment to operating in a culturally sustainable manner as a business.

10.5 Sustainable economy: the Scheme has and continues to encourage local participation by suppliers. Many of the team live locally.

10.6 Health Safety and Wellbeing: the suppliers and future suppliers have and are required to demonstrated environmental credentials, their commitment to operating in a proactive manner and their legislative responsibilities.

10.7 Construction Environmental Management Plan (CEMP): all our suppliers and delivery partners both contribute and work to assist each other in ensuring clarity and best practice.

10.8 Biodiversity and nature conservation: the beach and the designs delivered are to be constructed allowing for an increase in biodiversity net gain, protection of existing non-invasive species and encouragement of new colonies within a designated set aside area. This will help establish a connection of flora and fauna with existing established areas all along the seafront.

11. Health and Wellbeing Implications:

11.1 The promenade, beach access along Basin Road and facilities built on top of defence assets include education and skills, healthy places for communities, transport links and shared spaces bringing together people and communities.

11.2 The beaches and the structures built for sea defence have the added benefit of offering opportunity for wellbeing. This includes physical and mental and is shared across all groups helping to reduce inequality.

11.3 The wider beaches, repaired pathways and better defence offer increased wellbeing for millions of residents and visitors per year.

12. Procurement implications

12.1 The procurement strategy was set out and agreed in 2020 and further updated through the committee and cabinet approval process. The Scheme is split into three phases; 1, 2 and 3. Phase 1 covers all shared cost and runs the entire period from 2020 to the end of the whole Scheme – March 2028.

12.2 Procurement of Phase 3 is via open tender and there are no issues or concerns regarding this route in relation to the next phase of works.

13. Conclusion

13.1 The Brighton Marina to River Adur FCERM Scheme is a significant investment in coastal resilience and climate adaptation that supports the Council Plan priorities of protecting communities, supporting the economy and responding to climate change.

13.2 Phase 1 activities have substantially been completed, and Phase 2 construction works are progressing in accordance with the approved programme. Phase 3 represents the final major construction phase of the Scheme.

13.3 Additional Environment Agency funding has substantially reduced the Council's borrowing requirement while enabling the full Scheme to be delivered. The revised funding position represents a significant improvement in affordability compared with that reported to Cabinet in April 2025. Additional Environment Agency Grant in Aid has reduced the Council's anticipated borrowing requirement by £6.5 million whilst maintaining delivery of the full Scheme and retaining an appropriate level of contingency within the approved programme budget.

13.3 Approval of the recommendations will enable the Council, in its role as Lead Authority, to complete procurement and delivery of the final phase of the Scheme and realise the long-term benefits of improved flood and coastal erosion protection across this section of the Sussex coastline.

Supporting Documentation

1. Appendices

1.1 Appendix No 1 – Social and Community Engagement Delivery
1.2 Appendix No 2 – Equalities Impact Assessment
1.3 Appendix No 3 – Updated OBC

Social and Community Engagement Delivery

The BMRA has delivered considerable engagement activity but also delivered on the below actions as part of the wider Main Contract for Areas 5, 2A & 2B.

1. Delivered training on modern slavery
2. Delivered training on domestic abuse
3. Ran 1 government skills bootcamp, with 1 person going on to secure a position
4. Provided mock interviews for 4 candidates facing barriers to employment
5. Hosted an educational event focused on coastal flood defences and sustainable forestry for 80 local primary school children from two schools
6. Carried out a beach clean to prepare for the shingle replenishment
7. Delivered careers talks at Hove Park, PACA and Cardinal Newman School
8. Attended citywide careers events – Teen Tech and Hello Future – to champion coastal flood defences
9. Donated 1 cycle ride a month to Pedal People charity to facilitate regular visits for interested riders
10. Donated 1 speaker and 6 motorway cones and facilitated the permanent painting of a turning circle to Promenade Park run to help support marshalling and access
11. Ran a skills builder event at Woodingdean youth club to provide opportunities to young people at risk of becoming NEET
12. Provided 1 week work experience for 6 students from CNCS
13. Provided a summer placement for 1 student from Brighton University
14. 4+ CPD visits for council staff
15. Built a partnership with Men in Sheds charity to use the waste wood from the new groynes to create new items that will fund their ongoing workshops, supporting mental health and wellbeing
16. Donation of old groynes, complete with drilled holes, to create bee hotels at Brighton Youth Club
17. 300+ volunteer hours towards social value

Still to come:

1. 4 week placement for someone facing barrier to employment
2. £1k to homeless charities in the city
3. Secondary school event to support Gatsby Benchmarks and Government targets around careers guidance for 4 schools
4. £300 donation to Rise
5. £500 donation to Sanctuary Runners

Equality Analysis Screening Form

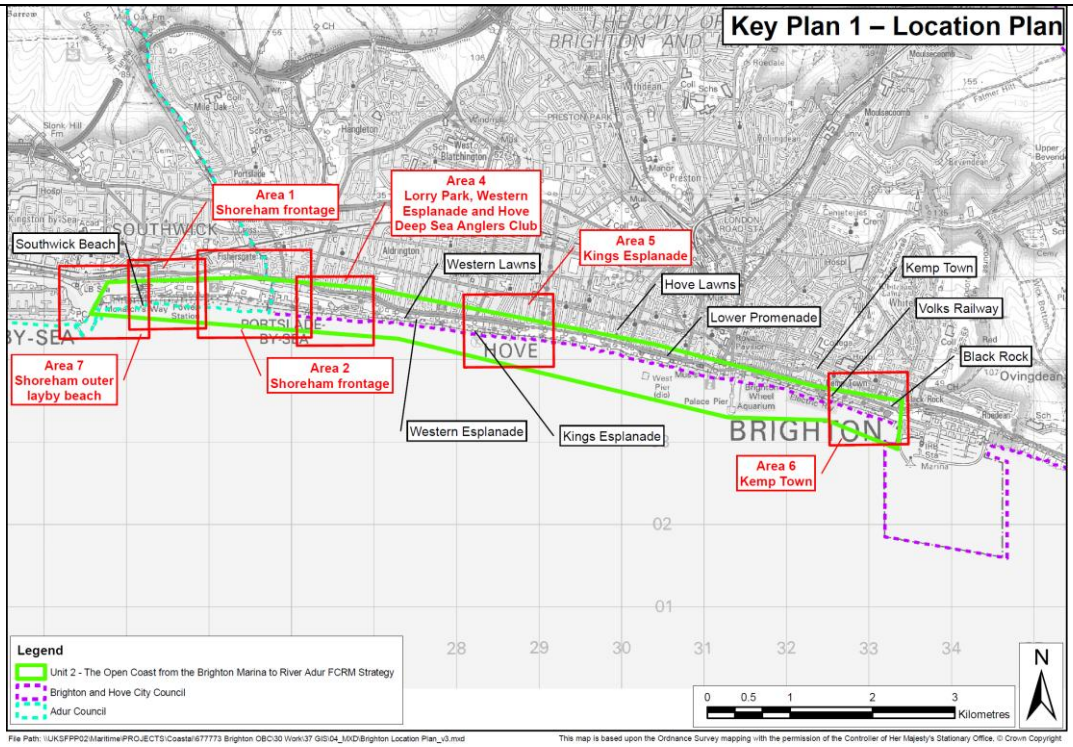
This form is to help you decide how in depth your Equality Analysis needs to be. Equality Analysis is how we gather information about the equality impacts of our activities, allowing us to make informed decisions that give due consideration to Equality, Diversity and Inclusion. This is a legal requirement under the Equality Act 2010. Please overwrite the embedded guidance to complete this form.

Owner	Louise Oldfield-Trim (JACOBS)

Team Members	Alistair Booton (Brighton and Hove City Council)

Date	25/10/2019

Activity
This could be anything from small projects to delivering our Flood Warning service. For example a; Policy, Programme, Project, Process, Procedure, Strategy, Service.
	Brighton Marina to River Adur FCRM OBC: the aim of this project is to improve the standard of service to 0.5% (1 in 200). The Outline Business Case seeks approval for Phase 1 which covers the first 15 years of the 100 year strategy programme.
	
	The preferred approach to achieve this is:
	
	• Beach monitoring and maintenance including allowance for recycling of 5,000 m^3/year of shingle to feed the Shoreham Port frontage and Brighton beaches sourced from Kemp Town beaches.
	• Biennial bypassing and recycling of 32,000 m^3 and 10,000 m^3, respectively under year 10 reducing to 32,000 m^3 in total thereafter, of shingle to feed the Shoreham Port frontage and Brighton beaches sourced from west of the Adur river mouth and Kemp Town beaches.
	• New works required:
	  • Movement of beach material from Kemp Town to Shoreham Outer Layby to widen beach in Year 2;
	  • New upstand flood wall (574/3703) in Area 1 Shoreham in Year 10
	  • New rock revetment at 574/3702 in Year 3
	  • Temporary rock revetment at 574/3814 in Year 3
	  • New upstand flood wall (574/3811) in Area 4 in Year 2
	  • Construction of new groyne field in Area 5 in Year 2.
	
	Figure 1 below shows the location plan.



The supply of natural beach material to the open coast frontage from the west is impeded by the mouth of the River Adur and the associated training walls. Limited sediment supply coupled with the natural attempt of the coast at Shoreham to orientate itself into a position normal to the prevalent south south-west wave direction, has resulted in significant erosive forces at the Shoreham end of the frontage. The residual life of the assets along the Shoreham Port frontage range from 15-30 years to <1 year.

The open coast frontage is also at risk of flooding from wave overtopping. Significant variations in defence heights and beach widths along the frontage have resulted in a number of weak points susceptible to flooding. Deteriorated and aged assets along the Southwick to Hove frontage have resulted in a poorly controlled beach susceptible to significant storm draw down and breach risk. A low crest level at the Hove Deep Sea Anglers' building which is exposed to wave overtopping can result in flooding of Western Esplanade and Basin Road. The poor beach alignment at Kings Esplanade has resulted in a promontory at this section of the frontage with a narrow steep beach susceptible to wave overtopping. The SoP of the current defences ranges from >100% AEP to 0.5% AEP. However, some of those assets that provide a 0.5% AEP are in poor condition with residual life of <1 year.

The project is currently being progressed to Outline Business Case. This is a Local Authority flood and coastal risk scheme.

Establishing relevance

Engage with protected groups (plus others) to gather information to answer these questions. Where different aspects of the activity would lead to different answers, the aspect that would lead to a 'yes' answer should be the overriding factor. Use the comments box to explain your answer and the evidence box to document where this information came from, this can be qualitative information as well as quantitative.

Questions	Yes	No
1. Are there any particular groups who do not or cannot access the service / participate in the activity?		X

Comments	**The works will address levels of erosion risk and low flood standard to ensure a 0.5% (1 in 200) standard of protection for the entire frontage between Brighton Marina to the River Adur. No community division would be resulting from the proposed works.** **At detailed design stage, Brighton and Hove City Council are proposing to undertake a public consultation exercise to ensure all individuals and groups can participate in the development of the scheme.**
Evidence	**No action from public is required for flood defences to be functioning.**

2. Does your information suggest that some groups of people are more dissatisfied than others in this area?		**X**
Comments	**Consultation was carried out throughout the Strategy development with relevant stakeholders and the public. The public were consulted on the short-listed options in 2013. The public consultation for the proposed Strategy in 2014 included an exhibition of static displays at four locations (Hove Town Hall, Brighton Library, the King Alfred Leisure Centre and Adur Civic Centre) for a week each time. In 2014, 28 consultation responses were received from local residents and interested parties on the proposed Strategy. Natural England and English Heritage stated their support for the Strategy, whilst the Environment Agency and the Marine Management Organisation confirmed that they had no specific comments on the Strategy. Further support was provided by Brighton and Hove City Council Sustainability Officer, Brighton Marina and Shoreham Port. Shoreham Harbour Regeneration partnership also provided general support, but raised concerns about the effect on a local business along the open coastal frontage. Other consultees had no objections to the Strategy but some concerns were raised regarding the effect on Basin Road South Site of Nature Conservation Interest, views from a local café and the potential for improving provisions for cyclists.**	
Evidence	**Strategy (2014) consultation responses.**	

Questions	**Yes**	**No**
3. Are there any issues relating to discrimination, harassment or victimisation that need to be addressed?		**X**
Comments	**There are no known issues of discrimination/harassment or victimisation.**	
Evidence	**Brighton and Hove City Council Coastal Engineer confirmed that there are no known issues.**	
4. Does this service provide opportunities to foster better relations between different groups of people?		**X**
Comments	**This a flood risk management project involving asset repair and improvement. All residents in the Shoreham and Brighton area will benefit from improved coastal flood protection. Within the next 15 years, we do not envisage any opportunities for fostering better relationships between groups (no new green areas or public space being created, no public activities proposed).**	
Evidence	**No new amenities created as part of the project.**	
5. Does this activity link to our strategic objectives?	**X**	
Comments	**The project meets the objectives set in The Beachy Head to Selsey Bill Shoreline Management Plan 2006 (SMP2) which recommended a Hold the Line (HTL) policy for the three epochs 0-20, 20-50 and 50-100 years for Brighton Marina to Portslade by Sea policy unit (4d12) and Shoreham Harbour (Southwick) policy unit (4d13).**	

	The project also meets the objectives set in the Brighton Marina to River Adur FCERM Strategy Review (Brighton and Hove City Council, 2014) to Improve the standard of flood protection to 0.5% (1 in 200). **6 OM2s will be provided by the scheme contributing to the Environment Agency's OM2s objectives.**		
Evidence	**The Beachy Head to Selsey Bill Shoreline Management Plan 2006 (SMP2) and the Brighton Marina to River Adur FCERM Strategy Review (Brighton and Hove City Council, 2014)**		
6. Are there any barriers that stop or limit how successful different groups of people are in this activity?			**X**
Comments	**Project offers flood protection across the Shoreham and Brighton area. No barriers present.**		
Evidence	**Confirmed with Brighton and Hove City Council Coastal Engineer.**		

Relevance Questions above answered “Yes”	**Next steps**
1 - 2 questions - Low	**Actions**: - Ensure communication strategy is up-to-date; - Ensure communication officer is in place prior to prelims commencing - Share any feedback from general public into project reviews.
~~**3 - 4 questions - Medium**~~	~~Complete the full analysis using a light touch approach~~
~~**5 - 6 questions - High**~~	~~Complete the full analysis using an in depth approach~~

Sign off Project Sponsor, Non-Financial Scheme of Delegation Approver or Grade 7 or above as appropriate	
Name	Alistair Booton
Role	Brighton and Hove City Council Coastal Engineer
I am aware of the equality issues affecting this activity. I am comfortable that all proportional actions are being taken to eliminate discrimination, advance equality and foster good relations. These actions are evidenced by the information gathered through consultation.	
Sign and date	APBooton 08/06/20

Please send the form to the Diversity mailbox

Works from Brighton Marina to River Adur Flood and Coastal Risk Erosion Management Strategy

Business Case Update Report

Version No: 1.1

Date: 11/2025

FINANCIAL SCHEME OF DELEGATION (FSoD) APPROVALS (Supplementary expenditure - request to increase previous approvals)

1.

Project name (Enter project name exactly as it appears on AIMS PD, if applicable)	**Brighton Marina to River Adur / FCERM**			
SOP Project Code	**SOS004C/011A/002A**		**Start date** (dd/mm/yyyy)	24/09/2020
Project ID (Example 2020/21-002152)	**2020/21-002989**			
Programme			**End date** (dd/mm/yyyy)	01/03/2028
Head Office dept. / team	**Coastal / Highways & Transport.**	For FSoD use only		
Area name	**Solent and South Downs**	**FSoD reference**		
Function	**Lead Authority**	**FSoD Date**		

Role	**Name**	**Post Title**	**% time on project**
Project Sponsor	Charles Field	Director City Infrastructure	5
Project Executive	Nick Bean	Principal Engineer	20
Project Manager	Steven Parker	Project Manager	50
NGSA Hub			

☐Note, this is a check box. If you double click on it, it will allow you to mark it 'checked' ☒.

3.

Risk Potential Assessment (RPA) Category	Low	☐	Medium	☒	High	☐

4.

Required level of Environmental Impact Assessment (EIA)	**N/A** ☐	**Low** ☒	**Medium** ☐	**High** ☐

5.

FSoD schedule		**Description**
C6	☒	Supplementary spend - An FCRM capital project
C7	☐	Supplementary spend – A non-FCRM project or FCRM revenue project

6.

Item approved under Section A	**Items approved under Sections C6/C7**	**FSoD Ref**	**Date** (dd/mm/yyyy)	**Amount Requested £k**	**Amount for Approval £k**	**Cumulative Approval £k**
SOC						
	BCUR (SOC1)					
	BCUR (SOC2)					
OBC		F/2021/0612	26/11/2020	12,085	12,085	12,085
	BCUR (OBC1)	F/2021/0612	04/01/2021	2,000	2,000	14,085
	BCUR (OBC2)		25/11/2025	11,836	11,836	25,921
FBC						
	BCUR (FBC1)					
	BCUR (FBC2)					

Total project cost (Estimated at SOC & OBC, actual at FBC) (£k)	43,202
Whole Life Cash Cost (£k)	56,787

7.

NPAS/LPRG chair name	**Post title**	Delivery Confidence Assessment			**Date**
		RED ☐	AMBER ☐	GREEN ☐	

8.

If the business case contains sensitive or commercial information or data that should be restricted (see Government Security Classifications) please tick the box.	**SENSITIVE:PROTECT** ☐

For FSoD Co-ordinator use only:

9.

FSoD approver(s) name	**Post title**	**Emailed approval**	**Date**

Business Case Update Report

1. Supplementary approval statement

An additional £11,836k of Grant in Aid (GiA) funding is being sought to undertake the approved works at the Open Coast section and Locked section of Shoreham Port (see Figure 1). These works aim to improve the standard of protection of the existing coastal defences to 0.5% AEP in accordance with the approved Brighton Marina to River Adur Flood and Coastal Erosion Risk Management (FCERM) Strategy. The scheme is led by Brighton and Hove City Council (BHCC) in partnership with Adur District Council (ADC).

The works for the OBC included Areas 1, 2, 4 and 5.

2. Background [Current approval is £14,085k; Expenditure to date of approved GiA is £7,941k; Expenditure to date of overall scheme is £7,000k]

The open coast frontage between Brighton Marina (east) and the River Adur (west) is at risk of coastal erosion and flooding due to limited natural sediment supply, ageing and deteriorating coastal defences, and inconsistent beach management.

The River Adur and its training walls obstruct sediment movement, intensifying erosion at Shoreham. Low significant variations in defence heights and beach widths along the frontage have resulted in a number of weak points susceptible to flooding. Without intervention, key defences could fail within 30 years, and some defences have a residual life of less than one year. This would increase the number of residential and commercial properties at risk of flooding.

Construction of several new coastal defences and beach renourishment works along the Brighton Marina to River Adur frontage will reduce the risk of erosion and flooding, protecting the urbanised areas of Brighton and Shoreham.

The scheme is located along the open coast from the River Adur to Brighton Marina, within the boundaries of Unit 2 – Open Coast (as shown in Figure 1) of the approved Brighton Marina to River Adur Flood and Coastal Erosion Risk Management Strategy. The length of the coastal frontage is approximately 10km, consisting of 2.15km of ADC frontage and 7.85km of BHCC open coastal frontage.

The Outline Business Case (OBC) for the scheme, approved in 2020, builds on the Brighton Marina to River Adur Flood and Coastal Erosion Risk Management (FCERM) Strategy Review (“the 2014 Strategy”), which was approved and adopted in 2014. The Strategy is consistent with the Beachy Head to Selsey Bill Shoreline Management Plan (SMP2), which recommended that a capital improvement scheme should be undertaken for Units 1 – Shoreham Locked Section and Unit 2 – Open Coast to improve the coastal defences to a 0.5% AEP to reduce long term (100-year) flood and erosion risk, taking account of long-term climate change predictions to sea level rise.

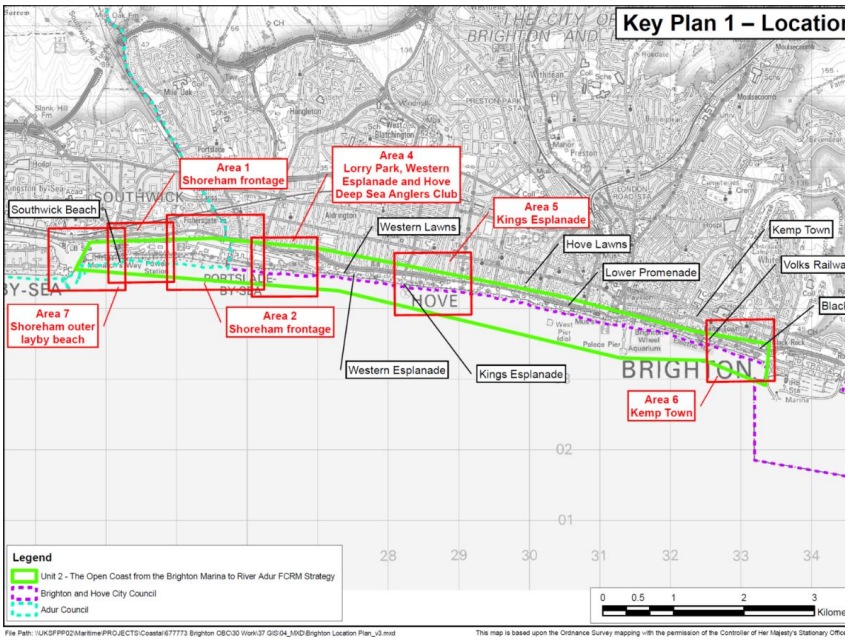


Figure 1: Location plan (Brighton Marina to River Adur OBC, 2020)

3. Reasons for change

	Reason for additional expenditure	Cost increase
1	**Incorrect Assumptions** - relating to physical conditions, stakeholder expectations. The increase in scheme costs is primarily due to two factors identified following the completion of the Outline Business Case (OBC): 1. The complexity and associated costs of the required engineering solutions was underestimated at the OBC stage. An underestimation of the consultancy costs for the design, environmental, planning, consents and level of surveys required for the works has resulted in additional works and expenditure. 2. The condition and residual life of the existing assets were found to be worse than originally assessed at the OBC, requiring more extensive engineering solutions to achieve the required standard of protection. One of the most significant cost increases stems from the deterioration of coastal defence assets, particularly the groynes, which were found to be in worse condition than originally assessed in the OBC. This has necessitated a significant increase in the shingle recharge scope, with approximately 170,000 tonnes of shingle now required. Between 2021 and 2024, accelerated shingle loss and groyne deterioration led to extensive shingle recycling efforts (Table 5) to prevent erosion and flooding near Basin Road in the west of the study frontage. In 2024, Environment Agency operations in Shoreham and Lancing further disrupted sediment balance downstream, increasing the need for replenishment and potentially increasing future recharge volumes. In Area 2B, a new sheet piled wall was required to be installed. The deteriorating groyne field in Area 2A resulted in a lower beach level than assessed at the OBC. This required a lower and larger toe for the rock revetment. In Area 5, the deteriorating groyne field results in an additional 80,000m^3 of beach material being required to achieve the design solution presented in the OBC.	

Table 1: Root causes of requests for additional financial approval

Since the OBC in 2020, further development and refinement of the scheme solutions have enabled a better understanding of the associated risks and constraints. More details on risk are provided in Section 7 for the commercial case.

4. Cost changes

Cost heading	Last Authorised Cost £k	*Cost increase £k	**New costs to be approved £k	Inflation increase £k	New total cost £k
Internal staff costs	192	69	-	-	261
External Consultant fees					
JBA Consulting / Mott MacDonald (up to OBC / detailed design)	146	1,770	-	-	1,916
Consultants, cost consultants and contractor fees	285	570	-	-	855
Project implementation					
Construction costs	20,486	8,827	-	-	29,313
Environmental/technical					
Site investigation and	115	255	-	-	370
Consents and licenses	55	95	-	-	150
Environmental mitigation and enhancement	10	258	-	-	267
Other costs					
Risk/compensation	9,476	31	-	-	9,507
Inflation	4,761	-4,200	-	-	561
Total project cost	35,526	7,676	-	-	43,202

* changes to costs that are previously approved
** costs that are being brought forward from a future stage (applies to Opportunistic change category only)

Table 2: Updated financial summary

Contracts affected	Previous cost £k	Increase in costs £k
JBA/Mott MacDonald (inclusive of Environmental/technical)	326	2,378
Contractor – design ESE	285	570
Contractor - construction	20,486	4,627
Total	**21,096**	7,576

Table 3: Cost increases by contract

Please note that Table 3 does not include a cost increase of £100k attributed to BHCC. If this is included then the total increase costs are £7,676k

Cost heading	Reason given for additional cost First reason cost £k	Total increase £k
Internal staff costs	69	69
External Consultant fees		
JBA Consulting / Mott MacDonald (up to OBC / detailed design)	1,770	1,770
Consultants, cost consultants and contractor fees	570	570
Project implementation costs		
Construction costs	8,827	8,827
Environmental/technical		
Site investigation and survey	255	255
Consents and licenses	95	95
Environmental mitigation and enhancement	258	258
Other costs		0
Risk/compensation	31	31
Inflation	-4,200	-4,200
Total project cost	**7,676**	**7,676**

Table 4: Cost Increases by reason (where is an increase v previously approved budget, not bringing forward budget from a later approval stage)

5. Strategic case update

The additional financial approval requested does not have a material impact on the previously approved strategic case. However, additional data has become available to influence the project's justification and decision-making since the OBC was submitted for approval in 2020, and this is summarised below.

Historic storm events

The OBC mentioned storm events during Winter 2013/14 which caused significant damage to the coastal defences, flooding of properties and disruption. Since then, there have been multiple storm events in 2016 (Storm Imogen), 2017, 2019 and 2022 (Storm Eunice) which resulted in overtopping, flooding of the promenade and closure of public areas.

Historic shingle recycling

The OBC stated that during the 1992 to 2017 period, approximately 17,600 m^3 was moved annually, with the occasional movement of shingle from Black Rock to Southwick on behalf of BHCC. Table 5 below sets out the total annual volumes of shingle that have been been recycled since 2017.

Year	Total volume of shingle recycled annually (m^3)
2017	14,850
2018	23,925
2019	0
2020	3,850
2021	23,100
2022	15,347
2023	22,000
2024	23,000

Table 5: Annual Shingle Recycling undertaken by BHCC since 2017

Condition of sheet pile wall in Areas 1 and 2

A 2023 condition inspection of the sheet piled wall in Areas 1 and 2 identified that the structures are no longer capable of supporting any crest raising works and are at imminent risk of failure, which would accelerate coastal erosion (JBA, October 2023). This assessment updates the condition reported in the 2016 CH2M asset condition report.

6. Economic case update

Changes to the previously approved option are summarised below.

Completed works

The programme of works has been reviewed in light of updated information since the OBC submission in 2020. While the programme of works remains unchanged, at the time of writing, several works have been completed along the frontage including:

- Detailed design and required approval and consents
- Construction of a new flood wall outside the Hove Deep Sea Anglers buildings (Area 4)
- Construction of a new rock revetment along Basin Road (Area 4)
- Ongoing annual shingle recycling works
- New sheet piling and capped sea wall defence at the Black Rock frontage (Area 6) – these £3m works were funded by BHCC independently of FCERM GiA
- Repairs to two timber groynes at Hove

Benefits and costs

Updates to the benefit and cost assessments since the approved OBC are detailed in Appendix A and summarised in Table 6. The changes are a result of:

- Updates to the damages/benefits in the 2020 OBC, to account for new information about the erosion year and valuation of the non-residential assets, most notably the damages associated with the Shoreham power station and sewage treatment works.
- Revisions to the costs and associated risk from contractors and early supplier engagement.

OBC version	PV whole life benefits	PV whole life costs	PV FCERM GiA	PV external funding contributions for 100% Partnership Funding score
2020 OBC	£181,973,988	£26,663,267	£9,781,633	£15,654,448
2025 BCUR	£483,285,637	£44,636,407	£21,746,104	£14,213,760

Table 6: Summary of benefit and cost assessment updates

Environmental assessment

Since the submission of the OBC in 2020, an Outline Construction Environmental Management Plan (CEMP) has been developed to support the construction of two rock revetments along the Shoreham beach frontage, as part of the Brighton Marina to River Adur FCERM Strategy. The Outline CEMP, included as Appendix B, sets out the environmental constraints and outlines the mitigation measures required to manage the impacts of the construction works.

7. Commercial case update

Contracting approach, procurement route and timescales

The preferred contracting approach to deliver the scheme remains individual design and construction commissions.

The original procurement strategy was produced in May 2020 and covered design and construction. The preferred contracting approach was to use existing framework agreements, especially:

- Detailed design – Environment Agency Next Generation Supplier Arrangements (NGSA) Collaborative Delivery Framework – Lot 1
- Construction – Environment Agency Marine and Coastal Framework (MCF)

Since then, the procurement approach for major construction works has changed to an open tender process to achieve delivery of best value. For example, the procurement strategy to use an open tender for Areas 2C, 2D and 5A in Phase 2 provided savings in excess of £1.7 million in comparison to prices provided at ESE stage under the CDF and value engineering. Given the works are now being procured through open tender, they are subject to the provisions of the Procurement Act 2023. Procurement of design services remains via the Collaborative Delivery Framework (CDF). The updated procurement strategy is provided in Appendix C.

The timetable for the agreement, procurement and award of contracts has also been updated since the OBC. Delays in planning and marine licensing decisions have impacted the schedule, resulting in a revised timeline. An updated summary programme is provided in Table 9 (Section 9 for management case). It remains the case that all scheme partners, in particular BHCC and ADC as local government authorities, are anticipated to require formal approval through their governance process prior to the award of any contract. The timeframe to achieve this has been included within the scheme programme.

Risk allocation

Since the OBC in 2020, further development and refinement of the scheme solutions have enabled a better understanding of the associated risks and constraints. In several cases, this has allowed risks to be mitigated or closed. Financial risk is distributed across all parties based on the cost of works within each area and its specific profile, as outlined in the current risk register (Appendix E). As the scheme progresses through the construction phase, risks associated with completed activities have been closed, and live risks are reweighted towards future activities using Monte Carlo analysis. The risk register is reviewed regularly to ensure it reflects the current project status. Additionally, the main works have been pre-costed and tested ahead of the tender process, with financial allocations formalised to cover costs, contingency, and the associated risk profile.

8. Financial Case update

Updates to the scheme costs and the Partnership Funding score since the approved OBC are detailed in Appendix A. The original approved scheme had a raw Partnership Funding score of 38% with PV maximum eligible GiA funding of £9,781,633. The updated costs and benefits since the approved OBC result in an overall increase of the raw Partnership Funding score to 60%, with a PV FCERM GiA funding towards the up-front costs of the scheme of £21,746,104. Furthermore, it remains an economically justifiable scheme with a positive benefit-cost ratio of 11.0.

The Project is supported by the RFCC and the new Cabinet of BHCC.

Tables 7 and 8 provide the updated expenditure and income statements to support this BCUR. Note:

- All values are cash costs (£k) and include risk, optimism bias and inflation.
- For the purposes of the Partnership Funding calculator, a 15-year benefit period is adopted as this is the time period between delivery of the benefits (year 3) and the next major investment (year 18), in accordance with the Partnership Funding guidance (EA, 2014).

Annualised spend profile (£k)	Pre-Yr 0	Yr 0 (this financial year)	Yr 1	Yr 2	Yr 3	Yr 4+	Total
Staff costs	101	48	28	28	28	28	261
Supplier costs to OBC and detailed design	1,829	237	-	-	-	-	2,066
Supplier costs during construction	-	-	180	180	180	75	615
Contractor costs	240	-	-	-	-	-	240
Site investigation	370	-	-	-	-	-	370
Environmental	-	-	-	267	-	-	267
Construction costs	2,529	1,976	11,815	4,246	5,518	3,229	29,313
Risk contingency on supplies and staff costs (20%)	-	57	42	42	42	21	202
Risk contingency on construction costs (20%)	-	395	2,363	903	1,104	646	5,410
Monte carlo (95%ile)		201	1,068	419	508	296	2,492
Optimism Bias (5%)	-	113	601	236	286	167	1,403
Inflation (2%)	-	45	240	94	115	67	561
Initial Project costs	5,070	3,072	16,337	6,415	7,780	4,527	43,202
Future costs:	-	-	-	-	-	-	-
- resource and capital	2,986	1,214	269	1,275	282	7,559	13,585
- future risk/optimism bias	-	-	-	-	-	-	-
Project whole life costs	8,056	4,286	16,606	7,691	8,062	12,087	56,787

Table 7: Updated expenditure statement

Annualised funding profile (£k)	Pre-Yr 0	Yr 0	Yr 1	Yr 2	Yr 3	Yr 4+	Total
Grant in Aid	5,070	3,072	8,000	1,949	3,500	4,330	25,921
Private contribution (Shoreham Port)			1,400	3,000	3,000		7,400
Partnership funding (BHCC)			6,937	1,466	1,280	198	9,881
Maintenance (BHCC)	2,986	1,214	269	1,275	282	7,559	13,585
Total	8,056	4,286	16,606	7,691	8,062	12,087	56,787

Table 8: Updated funding statement

9. Management case update

Project structure and governance

Figure 2 shows the current project governance structure. The following changes have been made since the approved OBC:

- Updated names of individuals
- Governance level updated from BHCC Committee to Cabinet at Level 5
- Confirmation of senior supplier as Van Oord UK Ltd
- Confirmation of delivery team as BHCC, JBA Consulting and Mott MacDonald

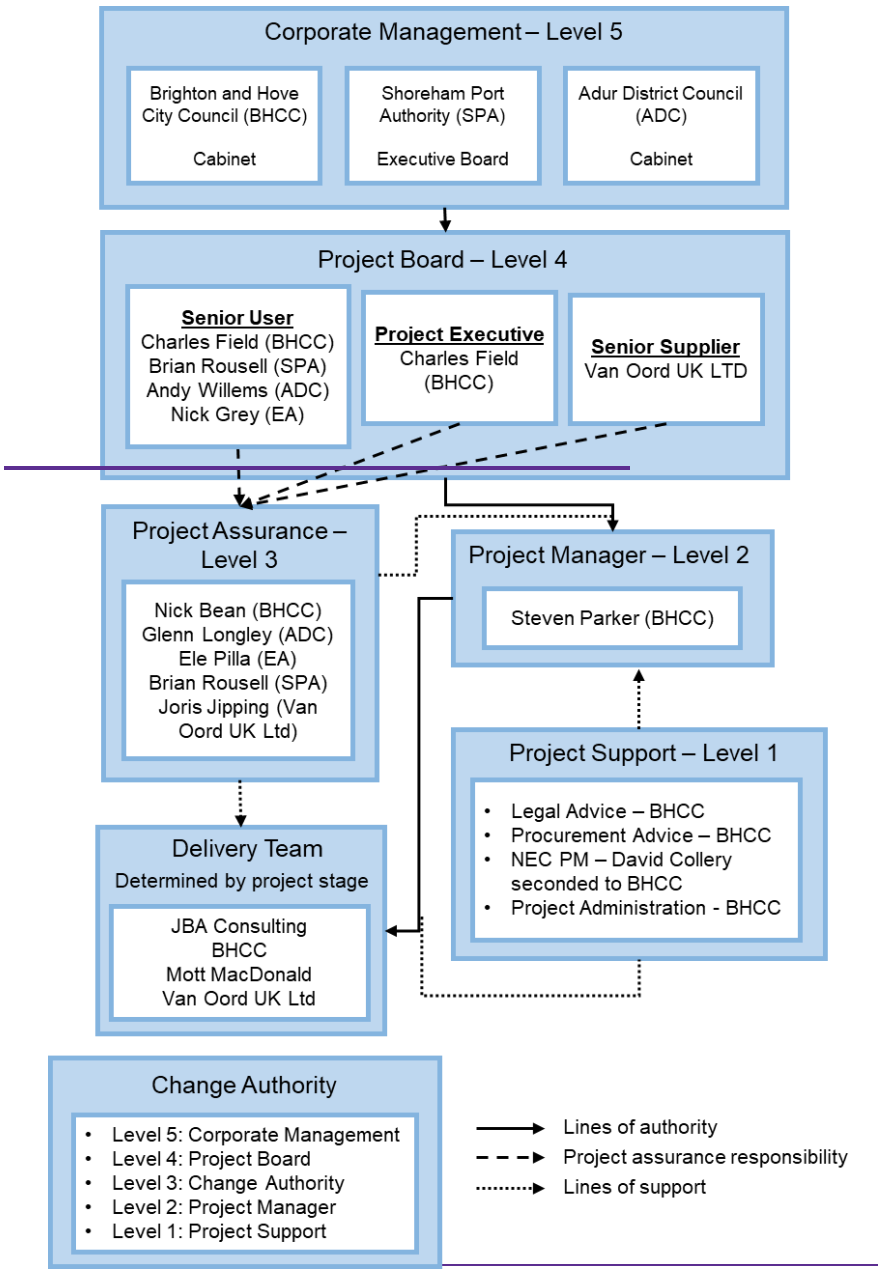


Figure 2: Updated project governance structure

Project roles and responsibilities

Corporate management and oversight of the scheme remains consistent with the approved OBC, with governance provided through Committee and Cabinet approvals

from BHCC and ADC, respectively. Shoreham Port Authority will continue to seek approval from its executive board.

However, there have been changes in the delivery team. The Senior Supplier role previously held by Jacobs during the outline design and appraisal stage is no longer active. Design services are now being provided by JBA Consulting and Mott MacDonald Limited.

Project plan

Some planned activities have now been completed since the approved OBC. Table 9 shows an updated summary programme.

Activity	Start	End
Detailed Design including surveys	2020	March 2026
EIA	2023	March 2028
Planning Consent, Marine Licence & Consents	2023	March 2027 to be extended until March 2029
Construction Contract Award	2023	March 2029
Construction – Area 4 (accelerated works)	2023	2024
Construction – Area 5	2025	2027
Construction – Area 2d & 2c	2025	2027
Construction – Area 2a & 2b	2027	2029
Construction – Area 1	2029	2030

Table 9 Updated summary project programme

Main Risks

The key risks with 'high' or 'significant' priority associated with the delivery of the scheme are outlined in Table 10 and forms part of the scheme's risk register in Appendix E. This was last reviewed in May 2025 and supersedes the risk register in the OBC.

Key Risk	Potential Consequences	Mitigating Actions
Partnership funding distribution.	Additional time to agree contributions with acceleration funding. Potential delays.	Continuous liaison with partners and contributors and sign legal partnership agreements / loan.
Increase in construction costs (management and design only).	Additional costs, impact on cost:benefit ratio of the scheme.	Early Contractor Involvement. Regular communication to understand required changes to the design.

Additional work and compensation events.	Additional design and construction costs. Delays.	Limit additional works to those required in consideration of risks and budgets. Track impacts on budget. Avoid prolongation and other impacts on project due to partner action/inaction. Transfer to consultant/contractor where possible.
Uncertainty in existing asset conditions requiring change of structural form.	Additional design and construction costs and delays to programme due to need for extensive designs and increased works.	Undertake structural investigations. Consultant to review information and maintain open communication to manage risk. Optimise budget. Transfer risk to the future by designing semi-temporary solutions. This risk has been realised and is reduced for future works as the majority of surveys have now been undertaken.
Extent of Area 2c repairs increasing during construction due to poorer than expected wall condition.	Additional design and construction costs and delays to programme due to need for increased works.	Practical measures on site. Supervisor / design support to be on site to review repairs during construction.
Damage to existing structures/assets.	Additional costs and delays to programme.	Transfer to Contractor. Complete pre-construction surveys of local housing, pier, seawall and highways.
Southern Water requires modification to outfall.	Additional costs and delays.	Engage Southern Water to understand asset..

Table 10: High Priority Risks

10. Recommendation

The BCUR seeks to release an additional £11,836k of FCERM GiA for the scheme.

Names of key consultees e.g. Finance Business Partner, PAD, NEAS, NE, Commercial, Legal etc.		
Name and job title	Date	Key outcomes from consultation
Nick Bean	24/11/2025	Approved
Steven Parker	24/11/2025	Approved
David Collery	24/11/2025	Approved
BHCC cabinet	24/11/2025	Approved
Project Board BHCC – ADW & SPA	24/11/2025	Approved

I confirm that the documentation is ready for submission to NPAS/LPRG/IT TAB/Budget Holder (delete as appropriate).

I, as Project Executive, have ensured that relevant parties have been consulted in the development of this project and the production of this update in particular the Project Sponsor and Senior User.

Name	Steven Parker
Job Title	Project Manager
Emailed approval	Steven.parker@brighton-hove.gov.uk
Date	25/11/2025

Attach email here.

Document List	File name
Business Case Update (Including FSOD Coversheet)	LIT 14175 – Business Case Update Report for Brighton Marina to River Adur FCERM Scheme
Appendix A: Brighton OBC – Economic Appraisal Update (Mott MacDonald, 2025)	OBC Economic Appraisal Update
Appendix B: Outline Construction Environmental Management Plan (CEMP)	Brighton Marina to River Adur FCERM Outline CEMP Final Report
Appendix C: Updated Procurement Strategy	Brighton Marina to River Adur FCERM Scheme Procurement Strategy 2020
Appendix D: Updated Risk Register	Scheme Risk Register_v4_15_May_2025

Appendix E – Briefing Note For FSoD Approver

Project Name: Brighton Marina to River Adur Flood and Coastal Risk Erosion Management Strategy
Date: 25/11/2025

	Current (k)	New (k)
FSoD Approval	**£14,085k**	**£25,921**
BCR (from PF calculator)	**5.3**	**11.0**
PF Score	**38% Raw PF score** **100% Adjusted PF score**	**60% Raw PF score** **100% Adjusted PF score**

Approval is sought for an additional £11,836k

1.0 Background

The open coast frontage between Brighton Marina (east) and the River Adur (west) is at risk of coastal erosion and flooding due to limited natural sediment supply, ageing and deteriorating coastal defences, and inconsistent beach management.

The River Adur and its training walls obstruct sediment movement, intensifying erosion at Shoreham. Low significant variations in defence heights and beach widths along the frontage have resulted in a number of weak points susceptible to flooding. Without intervention, key defences could fail within 30 years, and some defences have a residual life of less than one year. This would increase the number of residential and commercial properties at risk of flooding.

Construction of several new coastal defences and beach renourishment works along the Brighton Marina to River Adur frontage will reduce the risk of erosion and flooding, protecting the urbanised areas of Brighton and Shoreham.

The scheme is located along the open coast from the River Adur to Brighton Marina, within the boundaries of Unit 2 – Open Coast (as shown in Figure 1) of the approved Brighton Marina to River Adur Flood and Coastal Erosion Risk Management Strategy. The length of the coastal frontage is approximately 10km, consisting of 2.15km of ADC frontage and 7.85km of BHCC open coastal frontage.

The Outline Business Case (OBC) for the scheme, approved in 2020, builds on the Brighton Marina to River Adur Flood and Coastal Erosion Risk Management (FCERM) Strategy Review ("the 2014 Strategy"), which was approved and adopted in 2014. The Strategy is consistent with the Beachy Head to Selsey Bill Shoreline Management Plan (SMP2), which recommended that a capital improvement scheme should be undertaken for Units 1 – Shoreham Locked Section and Unit 2 – Open Coast to improve the coastal defences to a 0.5% AEP to reduce long term (100-year) flood and erosion risk, taking account of long-term climate change predictions to sea level rise.

The BCUR seeks to release an additional £11,836k of FCERM GiA for the scheme to cover increases in scheme costs since the OBC approval in 2020.

2.0 Reasons for change

The increase in scheme costs is primarily due to two factors identified following the completion of the Outline Business Case (OBC):

1. The complexity and associated costs of the required engineering solutions was underestimated at the OBC stage. An underestimation of the consultancy costs for the design, environmental, planning, consents and level of surveys required for the works has resulted in additional works and expenditure.
2. The condition and residual life of the existing assets were found to be worse than originally assessed at the OBC, requiring more extensive engineering solutions to achieve the required standard of protection.

3.0 Funding and Affordability

The original approved scheme had a raw Partnership Funding score of 38% with PV maximum eligible GiA funding of £9,781,633. The updated costs and benefits since the approved OBC result in an overall increase of the raw Partnership Funding score to 60%, with a PV FCERM GiA funding towards the up-front costs of the scheme of £21,746,104. Furthermore, it remains an economically justifiable scheme with a positive benefit-cost ratio of 11.0.

The funding continues to be a combination of BHCC, FDGiA and third party contributions from Shoreham Port Authority, with £23,466k from BHCC and £7,400k from Shoreham Port.

4.0 Risks

- Partnership funding distribution.
- Increase in construction costs (management and design only).
- Additional work and compensation events.
- Uncertainty in existing asset conditions requiring change of structural form.
- Extent of Area 2c repairs increasing during construction due to poorer than expected wall condition.
- Damage to existing structures/assets.
- Southern Water requires modification to outfall.

5.0 Timeline

Activity	Start	End
OBC Approved	2020	2020
Detailed Design including surveys	2020	March 2026
BCUR Update 1	2021	2021
EIA	2023	March 2028
Planning Consent, Marine Licence & Consents	2023	March 2027 to be extended until March 2029
Construction Contract Award	2023	March 2029
Construction – Area 4 (accelerated works)	2023	2024
Construction – Area 5	2025	2027
Construction – Area 2d & 2c	2025	2027

Construction – Area 2a & 2b	2027	2029
Construction – Area 1	2029	2030

6.0 Endorsement

BHCC TO INPUT ONCE VERIFIED

Brighton & Hove City Council

Cabinet Agenda Item 89

Subject: **Managing the Transport Network**

Date of meeting: **12 November 2026**

Report of: **Cabinet Member for Transport and City Infrastucture**

Lead Officer: **Corporate Director for City Operations**

Contact Officer: **Name: Tracy Beverley**
Email: tracy.beverley@brighton-hove.gov.uk

Ward(s) affected: **All**

Key Decision: Yes

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

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For general release

1 Purpose of the report and policy context

1.1 The Council has a statutory duty as Highway Authority to manage and maintain the highway network and secure the expeditious movement of traffic. Effective network management is essential to support public safety, facilitate the movement of people and goods, maintain access to homes, businesses and services, and enable sustainable economic growth.

1.2 A well-managed transport network helps Brighton & Hove City Council (BHCC) to manage its transport network in line with our 10-year City Transport Plan 2035 and to achieve the City's ambition to create a 'City to be proud' of by delivering an accessible, clean and sustainable environment making it easier and safer for people to move around the city.

1.3 Moving Traffic Enforcement is one way in which the council can manage the transport network. This involves the use of enforcement cameras to detect illegal movements. If illegal maneuvers are detected on the road network the council can issue penalty charge notices to deter this behavior.

1.4 This report seeks approval to implement Moving Traffic Enforcement at the first five locations identified following consultation and to agree a strategic approach for the identification and implementation of future Moving Traffic Enforcement locations.

1.5 The report also provides Cabinet with an update, for information only, on other initiatives that support effective management of the transport network,

including Lane Rental, the Digital Twin project and anticipated pavement-parking enforcement powers.

2 Recommendations

2.1 That Cabinet notes the outcome of consultation on the first five Moving Traffic Enforcement locations, (outlined in section 3 and detailed in Appendix 2) and approves the implementation of Moving Traffic Enforcement at those locations.

2.2 That Cabinet approves the strategic approach to the identification, prioritisation, consultation, implementation and review of Moving Traffic Enforcement locations, summarised in section 3 and set out in Appendix 1.

2.3 That Cabinet delegates authority to the Corporate Director for City Operations to approve and implement future Moving Traffic Enforcement locations in consultation with the lead Member for Transport.

2.4 That Cabinet notes the updates on School Streets, Lane Rental, the Digital Twin project and anticipated pavement-parking enforcement powers set out in section 3 of this report.

3 Context and background information

3.1 BHCC takes its statutory duties seriously and through a range of policies and initiatives works hard to keep our transport network safe, accessible and moving. This is highlighted as a priority for the city in our council plan particularly aligned with a city to be proud of maintaining and developing an accessible, clean and sustainable City and making it easier for people to move around the city. Closely aligned with delivering our Accessibility Strategy and supporting wider active travel choices and continuing to work towards carbon net zero.

3.2 This is further set out in our adopted City Transport plan 2035 which identifies six objectives from increasing public transport use, delivering a safe, inclusive and integrated transport system and promoting active travel, technology and well-maintained streets and pavements.

3.3 This report sets out a coordinated approach to managing the transport network to achieve the objectives of the City Transport Plan and the Council's vision. It summarises several initiatives which will be used to manage the network and initiatives to help the council achieve its ambition for transport and the wider councils goals.

Moving Traffic Enforcement Powers

3.4 Moving Traffic enforcement is introduced to improve road safety and reduce congestion. By enforcing illegal manoeuvres such as banned turns and

access restrictions we can reduce the risk of collision and fear of collision this is particularly important where illegal manoeuvres affect our vulnerable road users such as the elderly, disabled, children, pedestrians and cyclists. Enforcement is carried out using specialist cameras on site which can detect number plates.

3.5 In December 2025 BHCC was awarded powers to enforce Moving Traffic offences by the Secretary of State, previously these were held by the Police. These devolved powers under the Traffic Management Act 2004 (Part 6) allow the council to manage the transport network improving road safety, managing congestion, and supporting sustainable transport

3.6 The focus for the initial use of these powers has been on supporting our School Streets schemes, designed to keep our school children safe at drop off and pick up times whilst encouraging and supporting active travel and removing traffic congestion outside of the school gates. Cameras and signage have been implemented at School Street Sites to enable enforcement to be implemented these sites.

3.7 Early monitoring at School Streets sites indicates a clear downward trend in drivers not complying with the no entry at school pick up and drop off. Following a peak of 894 contravention observations during the week commencing 7 September, two weeks later this was reduced to 693 (22.5%). Since the cameras have been introduced all monitored locations have either improved or remained stable. This notable improvement is all prior to implementation of the enforcement. We will build on the success of these schemes with the intention of introducing enforcement to all our existing School Street sites, subject to consultation. The School Streets programme is an existing initiative and no further approval in relation to the current trial is sought through this report. The results of the trial will inform the future approach to enforcement at existing School Street sites, with any further consultation or approvals undertaken as required.

3.8 Looking ahead we have developed a strategic approach to the identification, delivery and implementation of Moving Traffic Enforcement across the city. This is set out in Appendix 1. This policy establishes a data-led approach and mandates that enforcement should only be used where there is evidence of non –compliance on existing banned movements.

3.9 The policy also sets out the selection criteria for new sites including collision history, evidence of persistent non –compliance and/or congestion issues. It identifies the steps required for engagement and consultation and the process for ongoing review.

3.10 By enforcing a range of banned movements on the highway we can keep our network safe and reduce congestion. This approach sets out how we will use a data-led transparent approach, to identify enforcement locations, deliver these sites and monitor effectiveness and will support other initiatives such as School Streets and Safer, Better Streets.

3.11 An initial 5 sites have been identified using the process and have undergone an initial consultation. The full consultation results are in appendix 2 and shows at all sites a majority in favour of enforcing existing banned movements.

Phase 1 Moving Traffic Enforcement Locations.

1. Carden Avenue onto Carden Crescent **one way street**
2. London Road **prohibited left turn** onto New England Road
3. Ditchling Road **prohibited left turn** onto Baker Street
4. West Street **prohibited right turn** onto Rottingdean High Street
5. Ditchling Road into Francis Street motor vehicle **prohibition (except for access)**

3.12 These five initial locations have been identified through the assessment process and have subsequently been subject to public consultation. A total of 704 responses were received across the five proposals. 403 responses were in support, 253 against and 48 responses were neutral. At each separate location the majority of responses were in favour.

3.13 The principal issues raised by respondents who did not support the proposals related to access arrangements and the use of camera technology. Officers have considered these representations and consider the use of cameras follows strict data protection rules and is only used for the purpose of enforcement. A summary of the consultation, including the results for each location and the Council's response to the principal issues raised, is provided at Appendix 2.

3.14 Having considered the consultation responses, officers consider that enforcement remains justified at each of the five locations. Subject to Cabinet approval, Moving Traffic Enforcement will therefore be introduced at these locations and its effectiveness monitored in accordance with the strategic approach set out in Appendix 1.

3.13 The following initiatives form part of the Council's wider approach to managing the transport network. They are included to provide Committee with the wider strategic context and no decisions are sought in relation to these matters through this report.

Updates on Other Network Management Initiatives

3.14 The proposed Lane Rental Scheme would introduce charges for works undertaken on the most traffic-sensitive parts of the highway network at the busiest times. Its purpose is to incentivise those undertaking works to minimise disruption and reduce the impact of roadworks on the most congested parts of the network.

3.15 Cabinet approved the development, application to the Secretary of Sate and implementation of the Lane Rental scheme in February 2026. A Lane Rental Development group has been created to support the scheme design,

comprising of industry volunteers and the required formal consultation has taken place. The scheme documentation is being developed following this consultation. We are on track with our original programme to issue this scheme to the Secretary of State in November this year and subject to required approval to initiate this scheme in spring 2027.

Digital Twin

3.16 The Council is currently developing a digital traffic twin focused on improving bus reliability and network performance across key corridors including Lewes Road, Preston Circus and Valley Gardens. This project utilises live traffic signal detectors and bus data within a real-time operational and planning platform, enabling improved monitoring, forecasting and signal timing decision making to reduce bus and vehicle delay across the modelled network.

3.17 A bid was submitted to the Sussex Strategic Authority on 21 September 2026 which, if successful, would accelerate the project and extend its roll-out across the wider city. This would provide additional data and modelling capability to support more proactive management of the transport network.

3.18 Officers are also monitoring the development of new pavement-parking enforcement powers. These are expected to provide additional tools to address pavement obstruction and support safe and unimpeded pedestrian movement, particularly for disabled people, older people, people with visual or mobility impairments and those using wheelchairs or mobility aids.

3.19 Two separate civil enforcement powers for local authorities to manage pavement parking are currently at different stages of introduction. The first is expected to be introduced late in 2026. Proposed enforcement will be for ‘unnecessary obstruction of the pavement’. This will enable authorities to respond to instances of pavement parking without the need to introduce separate Traffic Regulation Orders. We will be reviewing the potential application of these new powers, as soon as the secondary legislation has been passed and Statutory Guidance has been published.

The second power is ‘Area wide prohibitions on pavement parking’. Schedule 32 of the English Devolution and Community Engagement Act gives the highest tier of authority in each area the power to impose an area wide prohibition in pavement parking. The legislation for these new powers will follow at a later date.

3.20 Officers will assess the implications for Brighton & Hove once the relevant legislation and statutory guidance are in place and will bring forward any necessary recommendations through the appropriate decision-making process.

4 Analysis and consideration of alternative options

4.1 Managing the city's Transport Network is a fundamental requirement of the Local Highway Authority and these proposals support the Councils' statutory duties to maintain a safe network and expeditious movement across its network. The recommendations within this report support this.

4.2 The strategic approach for the delivery of Moving Traffic Enforcement has considered learning to date, feedback from initial trials and is in line with best practice and government guidelines.

4.3 A do-nothing approach would limit the council's ability to take action at locations where congestion, obstruction and unsafe vehicle movements are affecting bus services, emergency access, road safety and the efficient operation of the highway network.

5 Community engagement and consultation

5.1 The strategic approach for the introduction of Moving Traffic Enforcement includes appropriate engagement and consultation at key stages providing the opportunity for the community to respond to proposals so that these can be considered.

5.2 The council will continue to use the consultation portal Your Voice to deliver full consultations on sites due to progress and formal Traffic Regulation Order consultations will be carried out where changes to the regulations on the highway apply.

5.3 Consultation results from the first 5 sites is outlined in Section 3.12-3.14. with majority in support of the introduction of moving traffic enforcement at all sites. Full consultation summary can be seen in appendix 2

6 Financial implications

6.1 The revenue costs associated with the recommendations of this report will be contained within existing Parking Services budgets and funded from any additional enforcement income generated. There are no new staffing requirements or additional contract pressures associated with the implementation of these 5 zones.

6.2 Projected costs of camera installation for all 5 of the sites outlined is projected at £94,000, this can be contained within the CCTV Capital programme set up for this purpose, which is funded by borrowing.

6.3 Use of surplus income from parking charges and penalty charges is governed by section 55 of the Road Traffic Regulation Act 1984. Once the direct costs of traffic management have been met, the use of surpluses is legally ringfenced to the provision of public transport services and to road, air quality and environmental improvements.

Name of finance officer consulted: David Wilder Date consulted (27/10/2026):

7 Legal implications

7.1 The Council is the local highway authority and is subject to the network management duty under the Traffic Management Act 2004, which requires it to secure the expeditious movement of traffic on its road network. Following designation by the Secretary of State, the Council now has power to undertake civil enforcement of moving traffic contraventions.

7.2 The recommendations in the report will enable the Council to exercise its enforcement powers in relation to the 5 locations identified and to adopt a strategic policy for future implementation. In exercising these powers the Council must have regard to the relevant statutory guidance, consultation and ensure any restrictions are supported by required traffic orders and signs.

7.3 The Council must also comply with its public sector equality duty and regard should be had to the equality impact assessment when considering this report and recommendations.

Name of lawyer consulted: Katie Kam Date consulted (27/10/2026):

8 Risk implications

The following risks and corresponding mitigations have been identified and are in place: -

Ref	Risk	Impact	Rating	Action to reduce risk	Owner
R1	Committee does not approve the proposals	Schemes are delayed and existing congestion and safety issues continue	High	Provide a clear evidence-based report explaining the benefits and consequences of not progressing	Project Lead
R2	Public opposition to individual sites	Delays, complaints and reputational damage	High	Consult clearly, respond to concerns and explain the reasons for each site	Project Lead
R3	Legal or statutory requirements are not followed	Legal challenge, delay or additional costs	High	Obtain legal advice and complete all statutory processes	Project Lead
R4	Traffic or parking moves to nearby roads	Congestion or parking problems occur elsewhere	Medium	Monitor surrounding roads and review schemes after implementation	Traffic Manager
R5	Scheme costs exceed the available budget	Sites may be delayed or reduced in scope	Medium	Update cost estimates and monitor spending regularly	Programme Manager
R6	Signs, cameras or systems do not work correctly	Incorrect enforcement, complaints or appeals	High	Test equipment and complete checks before enforcement begins	Enforcement Manager

R7	The scheme affects disabled people, residents or businesses unfairly	Equality impacts, complaints or legal challenge	High	Complete equality assessments and consider loading and access needs	Project Lead
R8	The scheme is seen as being about income rather than safety and congestion	Loss of public confidence and reputational damage	High	Clearly communicate the purpose, evidence and expected benefits	Communications Lead

9. Equalities implications

9.1 A full EQIA for the delivery of Moving Traffic Enforcement can be seen in Appendix 3. Moving Traffic Enforcement is a tool to help manage the city transport network to help prevent illegal movements that put our most vulnerable residents at risk**.**

The outcome of the initial EQIA has heighted a number of actions to undertake as part of the introduction of MTE this includes ensuring all consultation remains accessible for all users, monitoring impact of enforcement at junctions to ensure fair and inclusive system for all and to introduce a 'warning' period to provide a fairer approach.

10. Sustainability implications

The initiatives set out above contribute to improving the transport network for all including those most vulnerable road users. The initiatives will contribute towards a more reliable public transport service and reduce collisions which in turn will support active and sustainable travel

11. Conclusion

11.1 The recommendations, set out in section 2 are aligned with council priorities and help the council deliver a safe, accessible transport network, making it easier for everyone to move around. The risks related to these recommendations have been considered and with mitigations in place are limited.

Supporting Documentation

12. Appendices

1. Moving Traffic Enforcement Policy 2026
2. Summary of consultation on 5 Moving Traffic Enforcement sites

3. Moving Traffic Enforcement Equalities Impact Assessment

13. Background documents

1. Background documents Brighton & Hove City Council - Agenda for Environment, Transport & Sustainability Committee on Tuesday, 22nd June, 2021, 4.00pm Item 15 Brighton & Hove City Council - Agenda for Transport & Sustainability Committee on Tuesday, 5th December, 2023, 4.00pm Item 46

2. Full consultation results report available on request.

November 2026

Strategic Approach to Moving Traffic Enforcements

1. Overview

1.1. BHCC approach to moving traffic offences is strategic, targeted, and safety-led, using devolved powers under the Traffic Management Act 2004 to manage the transport network improving road safety, managing congestion, and prioritising sustainable transport. This forms part of our wider strategic approach to managing transport in our City and works towards delivering the objectives in our City Transport Plan 2035.

1.2. BHCC became a civil enforcement authority for moving traffic contraventions in December 2025, following approval by the Secretary of State and statutory consultation processes.

1.3. This strategic approach sets out how BHCC will apply these powers inline with The Traffic Management Act 2004. Part 6 section 87 which details how authorities should develop, implement, operate and review moving traffic enforcement regimes.

2. Policy and Context

2.1. The use of these powers is a mechanism for BHCC to manage its transport network in line with our 10-year City Transport Plan 2035 and to achieve the Cities ambition to Create a city to be proud of by delivering an accessible, clean and sustainable environment making it easier and safer for people to move around the city.

2.2. By introducing moving traffic enforcement, we can Improve road safety – by reducing illegal manoeuvres such as banned turns on the public highway we will reduce the risk of collision particularly in areas where turning manoeuvres are banned due to for vulnerable users (children, pedestrians, cyclists) in the road.

2.3. Early use of the powers has been gained specifically to support the delivery of School Streets following Government Best Practice and to improve compliance and reduce dependence on volunteers at these sites.

2.4. These powers will also be used further to support banned movements to improve the safety of our transport network, reduce congestion and walking and cycling by protecting those most vulnerable and helping to keep the network moving.

2.5. BHCC enforcement powers under this approval covers the following moving traffic contraventions (banned movements);

- Stopping in yellow box junctions
- Banned right or left turns
- No entry contraventions
- Banned u –turns
- Driving the wrong way in a one-way street.
- Vehicles entering restricted streets – e.g. School Streets.

3. Steps Required to identify locations

3.1. A central principle of the strategy is to ensure targeted enforcement; not blanket coverage, enforcement will be considered the last approach and will only be applied where there is poor compliance on existing banned movements.

3.2. Enforcement of these banned movements will only be considered once the correct Traffic Regulation Order is confirmed to be in place and the supporting signage and lining implemented in line with government guidance, specifically Traffic Signs Regulation and General Directions (TSRGD 2016).

3.3. Before enforcement is considered there must be at least one of the following;
Police recorded data showing collisions as a result, likely as a result of non-compliance
Specific reports / evidence of persistent illegal movements deemed likely to cause road safety issues
Specific reports / evidence of persistent illegal movements deemed likely to cause and /or congestion.

3.4. Before enforcement is considered officers must consider all other deterrents to non-compliance including additional clear signage, and minor adjustments to the road layout.

3.5. Enforcement cameras are a significant investment so a cost benefit analysis for each site must also be considered alongside

3.6. Officers will consult with the lead member for transport and seek approval to move to the next stage.

3.7. Following site selection and prior to delivery we will carryout the following steps;

- Consultation with Chief of Police followed by a 6-week public consultation, setting out the rational for enforcement.
- Public communication campaign setting out setting out the councils proposals

3.8. Once the camera is installed

3.9. A 6-month warning notice period will be enacted, during which time the first offence is issued a warning only, within the 6 month period. A second offence at the same location may lead to a (Penalty Charge Notice (PCN) being issued

3.10. Officers will also review new enforcement sites on an annual basis. A full review of the enforcement sites will be carried out and reported in the Annual Parking Report. Where sites are consistently reaching significant, improved compliance officers will consider removing and relocating cameras on a temporary basis.

Moving Traffic Enforcement Consultation Results Summary

A total of 704 location-specific responses were recorded across the five locations. Results are reported separately because a respondent could support enforcement at one location while opposing it at another.

Location	Total	In favour	Against	Neutral	No rating
London Road / New England Road	129	61 (47.3%)	56 (43.4%)	8 (6.2%)	4 (3.1%)
Francis Street / Ditchling Road	133	70 (52.6%)	52 (39.1%)	4 (3.0%)	7 (5.3%)
Carden Crescent / Carden Avenue	124	68 (54.8%)	49 (39.5%)	4 (3.2%)	3 (2.4%)
Ditchling Road / Baker Street	112	56 (50.0%)	47 (42.0%)	4 (3.6%)	5 (4.5%)
Rottingdean High Street / West Street	206	148 (71.8%)	49 (23.8%)	4 (1.9%)	5 (2.4%)

Overall, responses showed support for introducing camera enforcement at the proposed locations. Respondents highlighted benefits relating to road safety, pedestrian safety and compliance with existing restrictions.

Respondents generally supported the introduction of camera enforcement and highlighted the benefits of:

- Improving road safety.
- Protecting pedestrians and other vulnerable road users.
- Encouraging compliance with existing traffic restrictions.
- Reducing congestion and improving traffic flow.

Respondents also raised questions and suggestions relating to:

- Signage and road markings.
- Access arrangements for residents, businesses and other permitted users.
- Privacy and the use of camera technology.

Equality Impact Assessment (EIA) Form

Support:

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

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

Processing Time:

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

Process:

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

1. Assessment details

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

Read the EIA toolkit for more information.

Name of activity or proposal being assessed:	**Moving Traffic Enforcement - Junctions**
Directorate:	City Operations
Service:	City Infrastructure

Team:	Parking Projects
Is this a new or existing activity?	New Activity
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:	Tamara Farragher, Senior Projects Officer
Accountable Manager:	Peter Turner, Senior Projects Team Manager
Additional stakeholders collaborating or contributing to this assessment:	Equalities Team

3. About the activity

Briefly describe the purpose of the activity being assessed:

Brighton & Hove City Council has been granted Moving Traffic Enforcement powers under Part 6 of the Traffic Management Act 2004. These powers will enable the council to enforce moving traffic restrictions through automatic enforcement measures at key locations across the city taking a significant step towards enhancing road safety.

A review of recent safety and compliance data has been undertaken across several key locations to understand the level of risk and the extent of non-compliance with existing traffic restrictions. Collision records from the past two years, alongside observed contraventions recorded over a one week period, provide a clear evidence base for considering the introduction of Moving Traffic Enforcement (MTE) within selected junctions within Brighton and Hove.

At **Carden Crescent / Carden Avenue**, where a one-way system operates, between 6th January and 3rd February 2026, 92 contraventions were observed within a single week.

At the **London Road / New England Road** junction, where a prohibited turn is in force, 25 contraventions were recorded over one week and in September 2025, there was one accident between two cars. The level of non-compliance already demonstrates that drivers are continuing to ignore the restriction despite correct signage and lining being present.

The **Ditchling Road / Baker Street** a collision occurred in December 2024. In addition, 57 contraventions were observed in a single week. Again, all signage is correctly installed, yet drivers continue to perform the prohibited turn. This combination of injury-related collisions and ongoing non-compliance highlights the limitations of signage-only measures.

At **Rottingdean High Street / West Street**, where another prohibited turn is in place. A high level of non-compliance was also observed, with 175 contraventions in a single week. This demonstrates persistent disregard for the restriction despite the signage being fully compliant and clearly visible.

For **Francis Street**, in November 2025, a collision between vehicle and pedestrian had also occurred. Many residents and members of the public have also reported that Francis Street is being used as a shortcut to reach London Road.

Camera enforcement will discourage unnecessary through traffic and help ensure the street is used only by vehicles that need access.

Traders will be able to access Francis Street for the open market where required for operational purposes, including deliveries, servicing, loading and unloading. The street will continue to function as an access route for legitimate business activities, supporting the day-to-day operation of market businesses.

There will be no requirement for a permit system or exemptions list - as Francis Street will remain accessible for residents, visitors, deliveries, essential services and traders.

Across all sites, the evidence shows that signage alone is not achieving the required level of compliance, even where it is correctly installed and meets all regulatory standards. The continued high number of contraventions, combined in some cases with injury-related collisions, provides strong justification for implementing Moving Traffic Enforcement (MTE). MTE would support improved compliance, reduce safety risks, and help ensure that restrictions are respected consistently by all road users.

The proposed change relates to the method of enforcement rather than the restrictions themselves, which are already in place and apply equally to all drivers. Compliance with traffic restrictions remains a matter of each and every driver's individual responsibility and all road users are expected to follow the relevant signage and road markings.

The purpose of this Equality Impact Assessment is to consider if the introduction of automatic enforcement measures can create or exacerbate barriers for particular groups in accessing and understanding the information and communications about the new Moving Traffic Enforcement arrangements and navigating or adapting to the new measures. The focus is to ensure that signage, communications and supporting information is clear, inclusive and accessible for all road users, including those with intersecting protected characteristics.

Moving Traffic Enforcement will be rolled out incrementally. This will allow Brighton and Hove residents to get used to the new measures put in place and the council to review impacts, identify barriers, and adjust communications and support to ensure equitable access for all groups

Residents will also have an opportunity to request to have their homes blurred in sight of Automatic Number Plate Recognition (ANPR) cameras.

What are the desired outcomes of the activity?

The desired outcome is to enforce Moving Traffic contraventions using Automatic Number Plate Recognition (ANPR) cameras across the city and subsequently improve compliance:

Dependent on approval from the 15th of October Cabinet, the project will initially focus on the first five locations listed above, this is due to the high number of contraventions:

Carden Crescent / Carden Avenue (Ward: Patcham and Hollingbury)

London Road / New England Road (Preston Park)

Ditchling Road / Baker Street (West Hill and North Laine)

Rottingdean High Street / West Street (Rottingdean & West Saltdean)

Ditchling Road / Francis Street (West Hill & North Laine)

Moving Traffic enforcement may be implemented within further future locations dependant on a future six week consultation, as well as reviewing feedback from the current consultation that is live.

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

Disabled Residents

Disabled drivers - especially those with cognitive impairments, visual impairments, or mobility challenges - may find it more challenging to adjust to changes in traffic restrictions enforcement. If alternative routes are longer or more complex, this could disproportionately affect some disabled people. There is also a risk of increased stress or worry about contraventions. However, all drivers are required to comply with traffic signs and road restrictions, regardless of personal circumstances or previous travel patterns. The key consideration is therefore whether the restrictions, signage and supporting communications are sufficiently clear and accessible to enable all road users to understand and follow them.

People with English as a Second Language

People for whom English is a second language may be more likely to face additional challenges in understanding existing traffic restrictions, especially if they rely on familiarity with local traffic arrangements or on observing other drivers' behaviour. Currently, widespread non-compliance may give the impression that certain turns are allowed. Once enforcement begins, these individuals may be more likely to receive penalties if they have been following the behaviour of others rather than the signage. However, all drivers are expected to follow the traffic signs and road markings in place, regardless of the actions of others The proposed change relates to the method of enforcement rather than the restrictions themselves.

Children and Young People

Children who travel in cars with parents or carers may be indirectly affected if households face financial penalties. For young drivers, who may be less experienced, there is a risk of accidental contraventions leading to fines that have a greater financial impact.

Parents and Carers

Parents and carers often juggle multiple responsibilities and may be more prone to making quick decisions under pressure. If they have previously relied on prohibited turns for convenience, the introduction of automatic enforcement may increase compliance and improve safety, while at the same time requiring some drivers to take longer routes, potentially increasing travel time during school runs or care-related journeys.

Low-Income Households

Financial penalties can have a disproportionate impact on low-income households. If individuals are unaware of the restrictions or have relied on following other drivers' behaviour, they may be more likely to incur fines.

While these restrictions are currently in place, the introduction of automatic enforcement may increase compliance and improve road safety, while, requiring some drivers to use alternative routes and potentially increasing journey times and fuel costs, which can be more burdensome for those on lower incomes. However, these impacts can reduce over time as people adjust to new enforcement measures.

Black and Racially Minoritised Communities

If Black and Racially Minoritised communities are over-represented in areas near the enforced junctions, they may be more exposed to enforcement. There is also evidence in some contexts that racially minoritised groups may have lower access to driving-related information or support, increasing the risk of unintentional contraventions. The key consideration is if signage and written information and supporting communications about the introduction of the automatic enforcement measures are sufficiently clear and accessible to enable all road users to understand and comply with the existing restrictions.

Businesses, Traders and Delivery Drivers

Delivery drivers and traders may experience increased journey times where they have previously relied on using prohibited turns. While these restrictions are currently in place, the introduction of automatic enforcement may increase compliance and improve road safety, while, requiring some drivers to use alternative routes and potentially increasing journey times.

Repeated penalties could also affect small businesses disproportionately. However, these impacts can reduce over time as people adjust to new enforcement measures.

Neurodivergent Individuals

Autistic drivers or those who are neurodivergent, for example people with ADHD may find changes to routine or increased enforcement stressful. Even though signage is unchanged, the shift from a non-enforced to an enforced environment can feel abrupt. Anxiety about making mistakes or receiving fines may be heightened.

Pregnant People

Pregnant people may experience increased fatigue, reduced mobility, or heightened stress, which can affect driving confidence. While these restrictions are currently in place, the introduction of automatic enforcement may increase compliance and improve road safety, while, requiring some drivers to take alternative longer journeys that could be physically uncomfortable. The possibility of receiving penalties may also add stress during a period when wellbeing is particularly important. This impact however can reduce over time as people adjust to new enforcement measures.

The signage, written information and supporting communications about the introduction of the automatic enforcement measures are sufficiently clear and will continue to be clear and accessible to enable all road users to understand and comply with the existing restrictions.

4. 4. Consultation and engagement

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

(If no consultation has been done or it is not enough or in process – state this and describe your plans to address any gaps.)

The Moving Traffic Enforcement (MTE) consultation commenced on 18 August 2026. Consultation letters were distributed to residential and business addresses in the surrounding areas, informing recipients of the proposal and inviting them to participate in the survey regarding the introduction of camera enforcement at selected junctions. In addition, a wide range of stakeholders were contacted by email and encouraged to participate through the council's Your Voice consultation platform.

The Parking Projects Team's telephone number and email address were provided within all consultation materials and on the council's website to ensure that residents, businesses and stakeholders can contact the project team with enquiries or request a paper or other accessible format of the survey.

Comprehensive information regarding Moving Traffic Enforcement is available on the Brighton & Hove City Council website, including a dedicated Frequently Asked Questions (FAQ) page. Following the close of the consultation period on 28 September 2026, the FAQ page will be updated to address common themes and questions raised through the Your Voice consultation process.

Prior to enforcement commencing, further notification letters will be issued to residents and businesses in the affected areas advising them of the date on which enforcement cameras will become operational. This information will also be published on the council's website.

To support public awareness and understanding, a six-month warning period will be implemented when enforcement begins. During this period, first-time contraventions at each enforced location will receive a warning notice rather than a Penalty Charge Notice (PCN). The warning notice will include information about Moving Traffic Enforcement and a link enabling the registered keeper to view footage of the contravention. This will help motorists understand the restriction and how the contravention occurred. Any subsequent contraventions may result in the issue of a PCN in accordance with the enforcement process.

Consultation and equality findings

A total of 377 people responded to the consultation. Respondents could comment on more than one proposed enforcement location, resulting in 704 location-specific responses. Of these, 403 were in favour, 253 were against, 24 were neutral and 24 provided no numerical rating.

Consultation feedback identified several issues relevant to the Equality Impact Assessment. Supportive comments commonly referred to road and pedestrian safety, near misses, vulnerable road users, non-compliance with existing restrictions, rat-running, prohibited vehicle movements, speeding and congestion. Concerns included the need for enforcement, traffic displacement, signage, value for money and access.

Equality monitoring

Equality monitoring questions were optional and were not completed by all respondents. Of the 377 respondents:

- 237 answered the age question

- 229 answered the sex question
- 217 answered the gender question
- 204 answered whether their gender differed from their sex assigned at birth
- 211 answered the ethnicity question
- 207 answered the question about long-term health conditions or disability
- 173 answered the religion or belief question

Due to the level of non-response, the demographic information should not be considered representative of all respondents or the wider Brighton & Hove population, but it provides useful information when considered alongside the consultation feedback.

Age

The largest age groups represented were 45 to 54 (55 respondents, 14.6%), 65 to 74 (53, 14.1%) and 55 to 64 (47, 12.5%). Younger people were less represented, with five respondents aged 16 to 24 and none aged 0 to 15.

Comments concerning pedestrian safety, vulnerable road users and near misses are relevant to age, as improved compliance with existing restrictions and reduced prohibited vehicle movements may particularly benefit people who are more vulnerable when navigating the highway, including some older people.

No specific adverse impact associated with age was identified through the consultation.

Disability and health conditions

Of the 377 respondents, 44 reported that their day-to-day activities were limited by a long-term health condition or disability, with 25 saying they were limited a little and 19 saying they were limited a lot.

Respondents also reported a range of health conditions and disabilities, including physical and long-term health conditions, learning differences, hearing impairments, mental health conditions, autism and learning disabilities.

The consultation's recurring concerns around pedestrian safety, vulnerable road users and near misses are particularly relevant when considering disability. Improving compliance with existing traffic restrictions may provide safety benefits for disabled people and others who may experience greater difficulty navigating the highway environment.

No specific adverse impact relating to disability was identified through the consultation.

Sex and gender

Of the 377 respondents, 114 identified their sex as male and 110 as female. For the separate gender question, 106 identified as male and 103 as female, with smaller numbers selecting non-binary or other. Fourteen respondents indicated that their gender differed from their sex assigned at birth.

No specific adverse impacts relating to sex, gender or gender reassignment were identified through the consultation.

Ethnicity

Of the 211 respondents who provided information on ethnic origin, 164 identified as White British, with smaller numbers from a range of other ethnic backgrounds.

The relatively small number of respondents within some ethnic groups, together with the level of non-response, means that robust comparisons between ethnic groups cannot be made. No specific adverse impact relating to race or ethnicity was identified through the consultation.

Religion or belief

Of the 173 respondents who answered this question, the largest groups were those reporting no particular religion or belief (75), Christian (45) and atheist (21), with smaller numbers representing other religions and beliefs.

No specific positive or negative impact associated with religion or belief was identified through the consultation.

Consideration of consultation concerns

Some respondents raised concerns about access and signage, particularly at Francis Street. The proposal is to enforce the existing access-only restriction and does not change existing legitimate access arrangements. Traders will continue to be able to access Francis Street to load and unload, and residents will continue to be able to access and park in their garages.

The consultation feedback has also informed the implementation of the scheme. Following a review of comments about the clarity and visibility of the restriction, additional signage will be put in place before enforcement begins to help make the restriction and access arrangements clearer to road users.

Overall EIA findings

The consultation indicates potential positive equality impacts from improved road and pedestrian safety and greater compliance with existing moving traffic restrictions. These benefits may be particularly relevant to some older and disabled people who may be more vulnerable when navigating the highway environment.

No disproportionate adverse impact on a protected characteristic was identified through the consultation. However, because equality monitoring was optional and some groups were represented by relatively small numbers, the findings should be considered alongside other available equality evidence.

The scheme has also been informed by issues raised during consultation. In particular, existing legitimate access at Francis Street will remain unchanged and additional signage will be provided in response to feedback about the clarity of the restriction. The operation of the schemes will be monitored following implementation to identify any unforeseen equality impacts.

Accessible and Inclusive Engagement

The council is committed to ensuring that consultation and engagement activities are accessible and inclusive. Information has been prepared in clear, plain English and presented in formats

designed to be easy to understand. Written communications use accessible formatting principles, clear headings and subheading, appropriate spacing, and high-contrast colour schemes.

Alternative formats, including Easy Read, large print, audio, translated materials, and other accessible versions, will be made available upon request. All communications include details of how residents and stakeholders may contact the project team to request reasonable adjustments or alternative formats. Requests can be made by telephone, email, or other agreed communication methods. These measures are intended to support participation by disabled people, people with sensory impairments, individuals for whom English is a second language, neurodivergent people, and others who may face barriers to accessing information.

Mitigation of Potential Impacts

The introduction of a six-month warning notice period, alongside advance notification letters to households and businesses, is intended to minimise potential adverse impacts by ensuring that enforcement is introduced gradually and communicated clearly. This approach provides an opportunity for motorists to familiarise themselves with existing restrictions and enforcement arrangements before financial penalties are issued.

This phased approach is particularly beneficial for groups who may face additional challenges in understanding or adapting to changes in enforcement arrangements, including older people, disabled people, pregnant people, people on lower incomes, individuals for whom English is a second language, and neurodivergent people.

Direct communication through letter drops provides an accessible means of reaching local communities, including those who may not regularly access online information or council communications. The council website, FAQ page and dedicated contact details further support access to information and enable residents to seek clarification where required.

The warning period also allows motorists to adapt established travel behaviours that may have developed during periods when restrictions were not actively enforced through camera technology. This reduces the likelihood of unintentional contraventions once full enforcement begins and supports a proportionate and educational approach to implementation.

Taken together, these measures demonstrate a fair, transparent and proportionate approach to introducing Moving Traffic Enforcement. They help to reduce potential barriers to understanding, support compliance with existing traffic restrictions and mitigate potential adverse impacts across a wide range of protected and community groups.

Non-Local Drivers

Drivers travelling into Brighton & Hove from outside the city may be less likely to receive local communications, such as notification letters or community updates, and may therefore be less aware of the introduction of Moving Traffic Enforcement. Although the underlying traffic restrictions and associated signage remain unchanged, some motorists may be unfamiliar with the move to camera enforcement.

Feedback received during the consultation has highlighted the importance of ensuring that existing restrictions are clearly understood. As a result, additional signing and road markings will be reviewed and implemented where appropriate to further improve clarity and assist compliance.

While compliance with traffic restrictions remains the responsibility of all road users, the introduction of automatic enforcement may require some motorists to adjust established travel

behaviours. This may increase the risk of contraventions during the early stages of implementation. The six-month warning period helps mitigate this risk by providing all drivers, including those from outside the city, with an opportunity to become aware of and adapt to the enforcement arrangements before penalties are issued.

Stakeholder Engagement

To help identify and understand any potential impacts arising from the introduction of Moving Traffic Enforcement, the council undertook targeted engagement with a wide range of stakeholders representing protected characteristic groups, transport users, businesses, educational institutions, emergency services, public authorities and community organisations.

The organisations contacted were invited to participate in the consultation and provide feedback on any potential equality impacts, barriers to understanding, accessibility issues or unintended consequences associated with the introduction of camera enforcement. Particular efforts were made to engage organisations representing disabled people, older people, carers, blind and partially sighted people, people with long-term health conditions, people from Black and Racially Minoritised communities and other groups who may face barriers to accessing information or travelling within the city.

Engagement was also carried out with active travel groups, public transport operators, business representatives, local authorities, emergency services and community organisations to ensure that a broad range of experiences and perspectives were considered. Feedback received through the consultation was reviewed and used to inform decision-making, identify any equality impacts and determine whether any additional mitigations are required before implementation.

The following organisations and stakeholder groups were contacted as part of the consultation process:

Community, Equality and Accessibility Groups

- A Seat At The Table
- Able and Willing
- Achieve Together
- Ageing Well
- Amaze
- Age UK
- BADGE (Brighton Access for Disabled Groups Everywhere)
- Beach Access Team (BAT Brighton)
- Black & Minority Ethnic Community Partnership
- Carers Centre for Brighton & Hove
- East Sussex Vision Support (VIABLE)
- Guide Dogs
- Older People's Council
- Possability People
- Scope
- Sussex Ehlers-Danlos Hypermobility Syndromes (SEDS)

- Thomas Pocklington Trust

Transport, Mobility and Active Travel Groups

- 20 Minute Neighbourhoods / Hove Society
- Active Sussex
- Beryl Bikes BTN
- Bricycles
- Brighton Active Travel
- Brighton Bike Hub
- Cycling UK
- Living Streets Brighton & Hove
- Pedal People
- People's Parking Protest
- Rail Future
- Sustrans
- Transport Action Network

Public Transport Operators

- Brighton & Hove Bus Company
- Brighton & Hove Community Transport
- Compass Travel
- Govia Thameslink Railway
- National Express Ltd
- Stagecoach South
- The Big Lemon Bus Company (no contract in Brighton & Hove)

Local Authorities and Public Bodies

- Adur & Worthing Councils
- Brighton & Hove Local Access Forum
- East Sussex County Council – Public Transport
- Rottingdean Parish Council
- South Downs National Park Authority
- Sussex Police
- Sussex Safer Roads Partnership
- Transport for the South East (TfSE)
- West Sussex County Council

Emergency Services

- East Sussex Fire & Rescue Service
- South East Coast Ambulance Service

Business and Commerce

- Brighton & Hove Chamber of Commerce
- Brighton Business Improvement District
- Churchill Square Shopping Centre
- Enterprise Car Club
- Freight Transport Association
- Shoreham Port Authority
- Taxi Trade Representatives

Youth, Education and Community Organisations

- Brighton & Hove Youth Council
- Brighton & Hove Community Works
- South East Community Rail Partnership
- University of Brighton
- University of Sussex

The breadth of stakeholders contacted helps ensure that the views of groups who may be disproportionately affected by the implementation of Moving Traffic Enforcement are considered as part of the council's decision-making process and supports compliance with the Public Sector Equality Duty.

How consultation feedback was used

Feedback received through the consultation was and will continue to be used to:

- Identify any potential equality impacts and barriers experienced by residents, businesses and road users in relation to the introduction of Moving Traffic Enforcement.
- Assess whether consultation materials, signage, road markings and supporting communications are sufficiently clear, accessible and inclusive.
- Understand concerns regarding signage, road markings, camera placement and the visibility of existing restrictions.
- Consider whether any additional measures are required to improve awareness and understanding of the restrictions and enforcement arrangements.
- Review whether any groups with protected characteristics may experience disproportionate impacts and whether further mitigations are necessary.
- Inform any amendments to signage, road markings, communications or other supporting measures prior to implementation.

Early analysis of consultation responses has identified requests for additional signage and improved visibility of restrictions at some locations. These comments will be considered as part of the ongoing review of the scheme to ensure restrictions are communicated as clearly as possible.

The council will continue to monitor consultation feedback and use the findings to inform the final design and implementation of the scheme, while recognising that compliance with traffic restrictions remains the responsibility of individual road users.

Addressing Current Gaps

The public consultation was live for 6 weeks and closed on 28 September 2026.

Following the close of the consultation, the findings will be analysed and presented to Cabinet as part of the decision-making process.

Consultation feedback was used to identify any additional equality impacts, consider whether further mitigations are required, and inform recommendations regarding the implementation of Moving Traffic Enforcement. Suggestions for future Moving Traffic Enforcement locations has also been kept under consideration.

5. Current data and impact monitoring

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

(State Yes, No, Not Applicable as appropriate)

Age	Yes
Disability and inclusive adjustments, coverage under equality act and not	Yes
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	Yes
Religion, Belief, Spirituality, Faith, or Atheism	Yes
Sex	Yes
Gender (including non-binary and Intersex people)	Yes
Gender Reassignment	Yes
Sexual Orientation	NO
Marriage and Civil Partnership	NO
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	NO
Armed Forces Personnel, their families, and Veterans	NO
Expatriates, Migrants, Asylum Seekers, and Refugees	NO
Carers	NO
Looked after children, Care Leavers, Care and fostering experienced people	NO

Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	NO
Socio-economic Disadvantage	NO
Homelessness and associated risk and vulnerability	NO
Human Rights	NO
Another relevant group (please specify here and add additional rows as needed)	NO

An equality monitoring section was included within the consultation to help understand the profile of respondents and inform the Equality Impact Assessment (EIA). The questions were optional and covered a range of protected characteristics including age, sex, gender, ethnicity, religion or belief, and disability. This information has been considered alongside the consultation responses to help identify any potential impacts on different groups and support the development of the proposals.

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

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

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

The introduction of Moving Traffic Enforcement will apply equally to all motorists using the affected junctions. While comprehensive equality monitoring data for all road users cannot reasonably be collected, this reflects the nature of the scheme rather than a gap in data collection. Individual motorists using the junctions are not routinely identifiable by protected characteristic, so the potential impacts will need to be assessed through available sources, including feedback from road users, stakeholder engagement and relevant service data.

Further monitoring will be carried out once MTE is implemented to ensure that impacts on all key groups are understood and managed effectively. This will include analysing warning notices issued during the six-month advisory period, reviewing patterns in contraventions, and identifying whether particular groups or locations are disproportionately affected.

Feedback from residents, captured through existing council channels, any complaints or enquiries, will also help highlight emerging issues. In addition, on-street observations and periodic reviews of traffic flow and pedestrian behaviour will support a fuller understanding of how different groups experience the changes.

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

To ensure the ongoing fairness and effectiveness of Moving Traffic Enforcement, the service will put in place structured arrangements for monitoring and reviewing its impact. This will include regular analysis of contravention data, particularly during the six-month warning notice period, to identify any emerging patterns or disproportionate impacts on specific groups. Feedback from residents, community organisations, and road users will be gathered through existing council channels to help highlight any issues experienced by elderly older people, disabled residents, people for whom English is a second language, pregnant people, or other groups. For these groups whom English is a second language the warning and PCN notice will give them an opportunity to see their vehicle driving through the contravention area and gain understanding on why they have received a warning notice or PCN.

The service will also review complaints, enquiries, and representations received once enforcement begins, using this information to assess whether additional support or accessible forms of communication are required. Periodic on-street observations and traffic assessments will help understand how behaviour changes over time and whether junctions are operating safely and predictably. These combined monitoring methods will ensure that the impacts of MTE are continually reviewed and that any necessary adjustments can be made to support equitable outcomes for all groups.

6. Impacts

Advisory Note:

- **Impact:**
  - Assessing disproportionate impact means understanding potential negative impact (that may cause direct or indirect discrimination) and then assessing the relevance (that is: the potential effect of your activity on people with protected characteristics) and proportionality (that is: how strong the effect is).
  - These impacts should be identified in the EIA and then re-visited regularly as you review the EIA every 12 to 18 months as applicable to the duration of your activity.
- **SMART Actions mean**: Actions that are (SMART = Specific, Measurable, Achievable, Realistic, T = Time-bound)
- **Cumulative Assessment:** If there is impact on all groups equally, complete **only** the cumulative assessment section.
- **Data analysis and Insights:**
  - In each protected characteristic or group, in answer to the question 'If "YES", what are the positive and negative disproportionate impacts?', describe what you have learnt from your data analysis about disproportionate impacts, stating relevant insights and data sources.
  - Find and use contextual and wide ranges of data analysis (including community feedback) to describe what the disproportionate positive and negative impacts are on

different, and intersecting populations impacted by your activity, especially considering for Health inequalities, review guidance and inter-related impacts, and the impact of various identities.
    - For example: If you are doing road works or closures in a particular street or ward – look at a variety of data and do so from various protected characteristic lenses. Understand and analyse what that means for your project and its impact on different types of people, residents, family types and so on. State your understanding of impact in both effect of impact and strength of that effect on those impacted.
- **Data Sources:**
    - **Consider a wide range (including but not limited to):**
        - Population and population groups
            - Census 2021 population groups Infogram: Brighton & Hove by Brighton and Hove City Council
        - Census and local intelligence data
        - Service specific data
        - Community consultations
        - Insights from customer feedback including complaints and survey results
        - Lived experiences and qualitative data
        - Joint Strategic Needs Assessment (JSNA) data
        - Health Inequalities data
        - Good practice research
        - National data and reports relevant to the service
        - Workforce, leaver, and recruitment data, surveys, insights
        - Feedback from internal 'staff as residents' consultations
        - Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
        - Insights, gaps, and data analyses on 'who' the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.
- Learn more about the Equality Act 2010 and about our Public Sector Equality Duty.

6.1 Age

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

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

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

According to Dashboard | Local Insight, the following wards have a high proportion of ~~elderly~~ older people:

- Patcham and Hollingbury : 20.40%
- Rottingdean & West Saltdean 29.97%

This data represents that there is a high proportion of older people within specific wards within Brighton and Hove. Brighton and Hove also has a very different age profile compared to the South East and England.

- Fewer children aged 0 to 15 years (15%) – South East (19%), England (19%)
- More working age adults aged 16 to 66 (72%) – South East (64%), England (65%)
- Fewer older people aged over 66 (13%) – South East (17%), England (16%)

Source: ONS 2021 Mid-Year Population estimates

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Positive impacts of introducing Moving Traffic Enforcement within Brighton ad Hove for Children and young people is the following:

- Safer travel for children and young people through reduced dangerous driving and calmer streets
- Cleaner air and lower exposure to harmful pollutants
- More opportunities for active, independent travel such as walking and cycling if people are able to do so

Negative impacts:

- Some drivers may experience inconvenience or frustration as restrictions become more strictly enforced
- Children who travel in cars with parents or carers may be indirectly affected if households face financial penalties. For young drivers, who may be less experienced, there is a risk of contraventions leading to fines that have a greater financial impact.

Positive impacts of introducing Moving Traffic Enforcement within Brighton and Hove for Older people (65+) is the following:

- Safer pedestrian environments with reduced traffic violations.

Negative impacts:

- Financial impact of penalties for those who face barriers to accessibility of information and communications about the new enforcement measures.

There are several potential mitigations:

- Ensure that information and communications about the new automatic enforcement measures are available in accessible formats such as for example large print, Easy Read or British Sign Language (BSL) and variety of languages when requested
- Use plain English in all communications.
- Translate key information and materials into community languages when requested.
- Implement a grace period with warning notices before full enforcement begins.

- Ensure the PCN appeals process is clearly explained, accessible, and easy to navigate.

6.2 Disability:

Does your analysis indicate a disproportionate impact relating to Disability, considering our anticipatory duty?	YES

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

The positive impacts for implementing Moving Traffic Enforcement within Brighton and Hove for those who are disabled are the following:

- Safer road conditions benefit wheelchair users and people with restricted mobility who use mobility aids while crossing the roads.

Potential negative impacts:

- Disabled drivers - especially those with cognitive impairments, visual impairments, or mobility challenges - may find it more challenging to adjust to changes in traffic restrictions enforcement. If alternative routes are longer or more complex, this could disproportionately affect some disabled people. There is also a risk of increased stress or worry about contraventions. However, all drivers are required to comply with traffic signs and road restrictions, regardless of personal circumstances or previous travel patterns. The key consideration is therefore whether the restrictions, signage and supporting communications are sufficiently clear and accessible to enable all road users to understand and follow them.
- Anxiety about penalty notices.
- Disabled people may face barriers to accessing the information and communications about the new enforcement measures. The key consideration is therefore whether the restrictions, signage and supporting communications are sufficiently clear and accessible to enable all road users to understand and follow them.

Nearly one in five residents (51,797 people, 19%) in Brighton & Hove are disabled as defined by the Equality Act. This is higher than seen in both the South East (16%) and England (17%).

Among disabled residents, for two out of five (20,351, 39%) their day-to-day activities are limited 'a lot' and for three in five (31,446 people, 61%) their activities are limited 'a little'. Both proportions are similar to what is seen in the South East and England.

Over four out of five residents (225,306 people, 81%) are not disabled as defined by the Equality Act. This is lower than seen in both the South East (84%) and England (83%).

Source: ONS 2021 UK Population Census

Brighton and Hove City Council will reduce barriers faced by older people by:

- Ensuring that information and communications about the new automatic enforcement measures are available in accessible formats such as for example large print, Easy Read or British Sign Language (BSL) and variety of languages when requested
- Using plain English in all communications.

- Implementing grace period with warnings before full enforcement begins (6 months' warning notices to allow people to get used to the new measures).

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).

Inclusive adjustments include:

- Ensuring that information and communications about the new automatic enforcement measures are available in accessible formats such as for example large print, Easy Read or British Sign Language (BSL) and variety of languages, when requested.
- Using plain English in all communications.
- Keep Parking Projects email and phone number on Moving Traffic Enforcement Web content page.

Brighton & Hove City Council is making inclusive adjustments to ensure that disabled people and people with access requirements can fully participate in the consultation. This includes adjustments for people who are housebound, D/deaf, have hearing or visual impairment, are neurodivergent, people with non-visible disabilities, and people with intersecting identities (e.g., Black and disabled, LGBTQIA+ and disabled).

Accessible alternatives to the online survey

For those who cannot complete the online survey, the council will provide an alternative method:

- People will be able to call a dedicated phone number and leave a message requesting a paper or other accessible copy of the consultation.
- Individuals can also ask questions in the voicemail, and the council will respond within 2 working days. This supports people who are housebound, digitally excluded, or who require non-digital formats.

Accessible communication channels

To reach people who do not have internet access or who rely on alternative formats:

- A press release will be issued in local newspapers.
- Information will be available on the council website in clear, plain language.
- The council will communicate directly with charities, disability organisations, community groups, and advocacy networks so they can share information with their members, including people with complex or intersecting access requirements.
- Posting physical letters in neighbourhoods around MTE junctions

Inclusive outreach

The council will ensure that organisations supporting:

- D/deaf and hearing impaired people
- Blind and visually impaired people
- Neurodivergent people
- People with learning disabilities
- People with long-term health conditions
- People with non-visible disabilities
- Intersectional groups (e.g., Black disabled people, LGBTQIA+ disabled people)

receive consultation information and can distribute it through their networks.

Equality monitoring

Brighton & Hove City Council will achieve equality insight by including equalities monitoring questions in both paper and digital consultations. These questions help identify whether different groups are being reached and whether the proposals may affect people differently.

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

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

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

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

Positive impacts for implementing Moving Traffic Enforcement:

- Reduced traffic improves safety for children and families from all ethnic backgrounds, especially in areas with higher pedestrian activity

Negative Impacts:

- Disproportionate financial impact in communities with lower average incomes.
- If Black and Racially Minoritised communities are over-represented in areas near the enforced junctions, they may be more exposed to enforcement. There is also evidence in some contexts that racially minoritised groups may have lower access to driving-related information or support, increasing the risk of contraventions.
- People for whom English is a second language may be more likely to face additional challenges in understanding existing traffic restrictions, especially if they rely on familiarity with local traffic arrangements or on observing other drivers' behaviour. Currently, widespread non-compliance may give the impression that certain turns are allowed. Once enforcement begins, these individuals may be more likely to receive penalties if they have been following the behaviour of others rather than the signage. However, all drivers are expected to follow the traffic signs and road markings in place, regardless of the actions

of others The proposed change relates to the method of enforcement rather than the restrictions themselves. The key consideration is if signage and written information and supporting communications about the introduction of the automatic enforcement measures are sufficiently clear and accessible to enable all road users to understand and comply with the existing restrictions.

- The council is only enforcing what is already on street and should be legally followed regardless of enforcement.

The potential mitigations for these negative impacts would be the following:

- Ensuring that information and communications about the new automatic enforcement measures are available in accessible formats and variety of languages.
- Using plain English in all communications.
- Implementing grace period with warnings before full enforcement begins (6 months' warning notices to allow people to get used to the new measures).
- Include an accessibility statement for relevant communications, outlining our approach to supporting access requirements, and how people can let us know about any access requirements.
- Ensure clear appeals process is accessible.
- Keep a contact number and email on the council's webpages

According to *Dashboard* | *Local Insight*, several wards in Brighton & Hove have notable proportions of residents from Black and Racially Minoritised backgrounds. For example, Kemptown has 0.12% White Gypsy or Irish Traveller residents and 1.99% Indian residents; Round Hill has 11.54% of residents recorded as "Any other combination of multiple ethnic groups – White and Non-British" (Census 2021); and Regency has 1.69% categorised as "Other Asian".

This data demonstrates that Brighton & Hove is home to diverse communities, and it is essential that the Council ensures Moving Traffic Enforcement is implemented in an inclusive and accessible way. This includes making sure that all residents, including those driving into the city, are aware of the new enforcement measures. Clear communication, accessible information, and the mitigations outlined above will help ensure that no group is disproportionately affected.

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

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

Based on a voluntary question from the 2021 Census;

- Over a half of residents (152,966 people, 55%) have no religion or belief. Significantly higher than seen in the South East (40%) England (37%) and the highest proportion of residents with no religion in England (upper tier local authorities).
- 19,760 residents (7.1%) did not answer the question
- Compared to the South East and England, Brighton and Hove has proportionally:

  More – Buddhists (2,455 people, 0.9%), Jews (2,455 people, 0.9%), and other religions (2,860 people, 1.0%)

  Fewer - Christians (85,629 people, 30.9%), Muslims (8,500 people, 3.1%), Hindus (2,100 people, 0.8%) and Sikhs (378 people, 0.1%)

Various impacts relating to religion are as follows:

Positive impacts

- Safer and more predictable travel routes may support people of faith who regularly travel to places of worship, community centres, or cultural events
- Calmer traffic conditions can make it easier for older or mobility-impaired worshippers to access religious sites safely

Negative impacts

- Potential confusion or concern among faith communities if enforcement changes are not communicated clearly or in culturally appropriate ways
- Risk of disproportionate impact on individuals who rely on car travel to attend places of worship, especially where public transport is limited or services occur outside peak hours
- Some people within faith communities may experience barriers in accessing or understanding information about the existing traffic restrictions and the introduction of automatic enforcement measures or the PCN appeals process where English is their second language.

Mitigations

- Ensuring that information and communications about the new automatic enforcement measures are available in accessible formats and variety of languages, when requested
- Using plain English in all communications.
- Include Parking Projects email and phone number on council's Moving Traffic Enforcement webpages, so that people can call and ask questions
- Implementing grace period with warnings before full enforcement begins (6 months' warning notices to allow people to get used to the new measures).
- Non-digital support options, such as telephone helplines or printed information, to assist those who may face barriers when accessing online systems
- Ongoing monitoring to identify any disproportionate impacts on religious communities and adjusting communication or support where needed

6.5 Sex:

Does your analysis indicate a disproportionate impact relating to Sex	YES

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

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

According to 2021 Census, there was estimated to be 141,000 female (51%) and 135,400 male (49%) residents in the city.

There are several positive impacts that may play out across gender lines. For example,

Positive impacts across gender lines

- Safer junctions can particularly benefit women and girls, who are statistically more likely to report concerns about personal safety when travelling, especially in areas with fast or unpredictable traffic
- Calmer, more predictable traffic conditions support carers, a role disproportionately held by women, by making multi-stop journeys with dependants safer and less stressful
- More reliable junction behaviour can support men, who are statistically more likely to be drivers and therefore benefit from clearer, more consistent traffic flows

Negative impacts across gender lines

- Women and girls may feel increased anxiety if they are unsure about new junction enforcement measures, especially when travelling alone or at night
- People with caring responsibilities (disproportionately women) may experience inconvenience if journeys involving multiple stops become longer due to stricter junction enforcement
- Men, who are statistically more likely to drive, may feel more directly affected by enforcement measures or perceive them as punitive.

Mitigations

- Clear, accessible communication explaining the purpose of MTE, how it works, and where it applies, helping reduce uncertainty for all genders
- Targeted engagement with groups disproportionately affected, such as women's organisations, carers' networks, and community safety groups
- Use of multiple communication channels (print, online, community venues) to ensure information reaches people regardless of digital access or caring responsibilities
- Monitoring gender-related impacts to identify whether any group is disproportionately affected and adjusting communication or support accordingly

6.6 Gender and Gender Reassignment:

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

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

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

Positive impacts for non-binary people:

- Safer and more predictable junctions can support non-binary people who may experience higher levels of harassment or discomfort in public spaces, making travel feel more secure
- Clearer, more consistent traffic behaviour can reduce anxiety for non-binary people who may feel less confident navigating busy or unpredictable junctions
- More inclusive public spaces created through calmer traffic can contribute to a sense of belonging and safety for people of all gender identities

Negative impacts for non-binary people are as follows:

- Increased enforcement can sometimes lead to heightened surveillance. For non-binary people, especially those who may already face profiling or discrimination, this can create discomfort or fear in public spaces.

Mitigations for all of the negative impacts stated above will be the following:

- Allowing residents to have the opportunity to have their properties blurred out when requested to do so.
- Use inclusive language and imagery in all communications about MTE to ensure non-binary people feel represented and respected. Monitor impacts across gender identities, including non-binary people, and adjust communication or support if any disproportionate effects are identified
- Offer 6-month warning notices.

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

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

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

The 2024 Health Counts survey found that approximately 1 in 20 adults (5%) living in Brighton and Hove are trans, non-binary or intersex.

Based on a voluntary question from the 2021 Census:

In Brighton & Hove a total of 220,742 residents (93.8%) of the population aged 16 years and over answered the following questions:

• A total of 218,401 residents (92.8%) answered "Yes", indicating that their gender identity was the same as their sex registered at birth.

• A total of 2,341 residents (1.0%) answered "No", indicating that their gender identity was different from their sex registered at birth. Within this group:

- 476 (0.2%) answered "No" but did not provide a write-in response
- 362 (0.1%) identified as a trans man
- 329 (0.1%) identified as a trans woman

- 1,174 (0.5%) wrote in a different gender identity

Negative impacts for those that have undertaken gender reassignment is that:

- For individuals undergoing gender reassignment, especially those who may already feel vulnerable in public spaces, having ANPR cameras implemented may heighten anxiety or fear of being misgendered or profiled. This negative impact may be mitigated by allowing residents to have the opportunity to have their properties blurred out when requested to do so.

Positive impacts:

- Trans people, like others, benefit from reduced traffic aggression and improved pedestrian safety. Enforcement helps create calmer, more predictable spaces around schools.
- Inclusive enforcement schemes often involve community consultation. Trans voices in these processes help shape safer, more welcoming ~~school zones~~ neighbourhoods.

6.7 Sexual Orientation:

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

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

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

Based on a voluntary question from the 2021 Census:

- Around 189,745 people (80.6%) identified as straight or heterosexual.
- Around 25,247 people (10.6%) identified with an LGB+ orientation (Gay or Lesbian, Bisexual or Other sexual orientation).
- The remaining 20,375 people (8.7%) did not answer the question.
- The proportion of residents aged 16 and over in Brighton & Hove identifying with an LGB+ orientation (10.6%) is three times higher than seen in both the South East (3.1%) and England (3.1%).
- The proportion of residents aged 16 and over in Brighton & Hove identifying with an LGB+ orientation (10.6%) is the highest proportion seen in any upper tier authority in England.

The following wards had a high number of Bisexuals:

Hanover and Elm Grove: 7.07%

Round Hill: 7.20%

West Hill and North Laine: 6.07%

Positive and negative impacts will be the following:

Positive impacts

- LGBTQ+ parents and caregivers, including same-sex couples, co-parenting arrangements, and chosen families, benefit from safer, more predictable junctions when travelling
- Busy, chaotic junctions can heighten vulnerability to street harassment or homophobia; calmer, enforced junctions reduce crowding and stress, helping LGBTQIA+ people feel more secure
- Inclusive enforcement schemes often involve community consultation, giving LGBTQIA+ residents opportunities to shape safer, more welcoming public spaces around key junctions

Negative impacts

- Some LGBTQIA+ people may feel increased anxiety if communication about new junction enforcement measures is unclear or does not reflect diverse identities and family structures
- Past negative experiences with public services may lead to mistrust or reluctance to engage with information about enforcement or PCN processes

Mitigations

- Use inclusive language and imagery in all MTE communications to ensure LGBTQIA+ people feel represented and respected
- Work with local LGBTQIA+ organisations, community groups, and Pride networks to share information and understand specific concerns
- Provide multiple communication formats, including non-digital options, to ensure accessibility for those who may avoid online systems
- Monitor impacts across sexual orientation and gender identity to identify any disproportionate effects and adjust communication or support accordingly
- Implement 6-month warning notices to allow people to get used to the new enforcement measures.

6.8 Marriage and Civil Partnership:

Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?	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.

According to Local Insight (Census 2021:

One family only: Married or same-sex civil partnership couple: No children (Census 2021):

Rottingdean & West Saltdean13.64%

One family only: Married or same-sex civil partnership couple: Dependent children:

Hollingdean and Fiveways: 18.27%

One family only: Married or same-sex civil partnership couple: All children non-dependent:

Rottingdean & West Saltdean (Saltdean primary): 5.43%

Based on a voluntary question from the 2021 Census;

- Only a third of Brighton & Hove residents (33%, 77,241 people) aged 16 or older are married or in a civil partnership. This is significantly lower than seen in the South East (48%) and England (45%). Among residents married or in a civil partnership, 3,867 residents (5%) are in a same sex marriage or civil partnership.
- Among all residents aged 16 or older, 3,867 people (1.6%) are in a same sex marriage or civil partnership. This is three times higher than seen in the South East (0.4%) and England (0.4%) and proportionally the highest number of residents in a same sex marriage or civil partnership in England (upper tier local authorities).

As Local Insight presents that there are various types of families within Brighton and Hove, implementing Moving Traffic Enforcement may lead to various negative impacts, such as the following:

- Anxiety about penalty notices and complex appeals.

Potential mitigations for these negative impacts are the following:

- Ensure clear appeals process is accessible.

Implementing Moving Traffic Enforcement at junctions also has positive impacts for families, such as:

- Significantly safer junctions, reducing the risk of collisions and creating calmer, more predictable environments for families travelling with children.
- More reliable and consistent traffic behaviour, making everyday journeys, such as school runs, childcare drop-offs, and family errands, less stressful.l
- Encouragement of active travel, as safer junctions can make walking, cycling, and scooting feel more comfortable for families.
- Reduced congestion at busy intersections.

Parents and carers often juggle multiple responsibilities and may be more prone to making quick decisions under pressure. If they have previously relied on prohibited turns for convenience, the introduction of automatic enforcement may increase compliance and improve safety, while at the

same time requiring some drivers to take longer routes, potentially increasing travel time during school runs or care-related journeys.

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

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

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

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

According to Joint Strategic Needs Assessment (JSNA) a total of 2,099 live births (32 births per 1,000 women aged 15 to 44 years) were recorded in Brighton & Hove in 2022. This is lower than England (52 per 1,000) and the South East (52 per 1,000) and is the lowest of all upper-tier local authorities in England.

Implementing Moving Traffic Enforcement within junctions may lead to various negative and positive impacts, such as the following:

Pregnancy & Maternity

Positive impacts

Safer junctions reduce the risk of collisions for expectant parents and those travelling with infants

Lower vehicle emissions at enforced junctions support respiratory health, which is especially important during pregnancy and early childhood

Calmer, less chaotic road environments can reduce stress and anxiety for new parents when travelling

Negative impacts

Parents and carers often juggle multiple responsibilities and may be more prone to making quick decisions under pressure. If they have previously relied on prohibited turns for convenience, the introduction of automatic enforcement may increase compliance and improve safety, while at the same time requiring some drivers to take longer routes, potentially increasing travel time during school runs or care-related journeys.

Paternity & Adoption

Positive impacts

Safer walking and cycling routes through calmer junctions can encourage bonding time during family journeys.

Enforcement that prioritises predictable, safe movement supports diverse caregiving roles, including adoptive and paternal figures.

Negative impacts

Confusion about new enforcement measures or receiving a Penalty Charge Notice may add pressure to already demanding routines for caregivers.

Menopause

Positive impacts

Cleaner air and reduced heat from idling vehicles can help ease symptoms such as hot flashes and fatigue

Infertility

Positive impacts

Cleaner air and reduced stress from calmer junctions can support general wellbeing, which may be beneficial during fertility treatment periods

Negative impacts

Traffic restrictions may interfere with time-sensitive medical appointments or increase emotional strain if journeys become more complex

Mitigations

To ensure Moving Traffic Enforcement at junctions is inclusive and supportive of these groups, Brighton & Hove City Council will:

Issue 6-month warning notices, giving people time to adjust to the new enforcement measures before full enforcement begins.

6.10 Armed Forces Personnel, their families, and Veterans:

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

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

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

Implementing Moving Traffic Enforcement within junctions may lead to various negative and positive impacts, such as the following:

Positive impacts:

Enforcement helps streamline routes, which benefits personnel with tight schedules or shift-based roles.

Less noise and congestion can be beneficial for veterans with PTSD or sensory sensitivities.

Negative Impacts:

Armed Forces families moving into new areas may be unfamiliar with enforcement zones, leading to violations.

Mitigations:

Continue using clear signage.

Issue 6-month warning notices, giving people time to adjust to the new enforcement measures before full enforcement begins.

6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

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

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

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

According to 2021 Census, one in five residents of Brighton and Hove (54,343 people, 20%) were born outside of the UK. This is a higher proportion than seen in the South East (16%) and England (17%).

Despite the overall number of residents only increasing by 1%, the number of residents born outside of the UK has increased by 27% (11,456 people) since 2011, with the proportion increasing from 16% to 20%.

Implementing Moving Traffic Enforcement within may lead to various negative and positive impacts, such as the following:

Positive impacts:

- Safer junctions improve conditions for children and caregivers travelling through busy areas, which is especially valuable for families unfamiliar with UK driving norms.
- Cleaner air and reduced congestion support physical and mental wellbeing, particularly for those who may already experience stress linked to resettlement or displacement.
- Calmer, more predictable traffic environments can help newcomers feel more confident navigating their neighbourhoods.
- Shared public spaces around safer junctions can support community interaction and help migrants, asylum seekers, and refugees feel more connected and included.

Negative impacts:

- Enforcement signage and rules may be unclear to non-native speakers, increasing the risk of violations or fines.
- Some migrant families may rely heavily on cars due to work patterns, distance, or safety concerns; changes of enforcement measures at junctions may disrupt routines or create logistical challenges.
- Increased enforcement presence may feel intimidating to refugees or asylum seekers who have experienced trauma or distrust of authorities.
- Language barriers may make it difficult to understand enforcement rules or navigate appeals processes.

- Digital exclusion may limit access to online information or guidance.
- Financial penalties may have a disproportionate impact on communities with lower average incomes.
- If migrant, asylum seeker or refugee communities are over-represented in areas near the enforced junctions, they may be more exposed to enforcement. There is also evidence in some contexts that racially minoritised groups may have lower access to driving-related information or support, increasing the risk of contraventions. The key consideration is if signage and written information and supporting communications about the introduction of the automatic enforcement measures are sufficiently clear and accessible to enable all road users to understand and comply with the existing restrictions.
- People for whom English is a second language may be more likely to face additional challenges in understanding existing traffic restrictions, especially if they rely on familiarity with local traffic arrangements or on observing other drivers' behaviour. Currently, widespread non-compliance may give the impression that certain turns are allowed. Once enforcement begins, these individuals may be more likely to receive penalties if they have been following the behaviour of others rather than the signage. However, all drivers are expected to follow the traffic signs and road markings in place, regardless of the actions of others The proposed change relates to the method of enforcement rather than the restrictions themselves. The key consideration is if signage and written information and supporting communications about the introduction of the automatic enforcement measures are sufficiently clear and accessible to enable all road users to understand and comply with the existing restrictions.
- The council is enforcing what is already in place through signage and is a legal requirement to improve road safety.

The potential mitigations for these negative impacts would be the following:

- Ensuring that and communications about the new automatic enforcement measures are available in accessible formats and variety of languages
- Provide information in accessible formats, such as Easy Read when requested
- Using plain English in all communications.
- Include the Parking Projects phone number and email address, if anyone has any questions
- Implementing grace period with warnings before full enforcement begins (6 months' warning notices to allow people to get used to the new measures).
- Ensure clear appeals process is accessible.
- Translate key information into commonly spoken community languages, when requested
- Ensure the appeals process is clearly explained and accessible
- Issue 6-month warning notices to allow communities time to understand and adapt to the new measures

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 impacts

Reduced traffic volume and speed at junctions lowers the risk of collisions, making travel safer for carers escorting vulnerable individuals.

Safer walking and wheeling routes encourage carers and those they support to use healthier, more sustainable travel modes.

Calmer, more predictable junctions can reduce stress for carers who often manage multiple responsibilities and time-sensitive journeys.

Improved road conditions benefit wheelchair users, people with restricted mobility, and their carers by reducing hazards and creating more accessible crossing points.

Negative impacts

Carers who rely on vehicles to transport individuals with limited mobility may face challenges navigating new junction enforcement measures.

Traffic rerouted from enforced junctions may increase congestion or safety risks on surrounding roads, affecting carers' travel times.

Informal carers, who make up the majority of the caring population, may struggle to understand new enforcement rules without targeted communication.

Carers with access requirements (e.g., visual impairments, neurodivergence) may find it harder to interpret new enforcement measures or navigate appeals processes.

Digital exclusion may limit access to online information or guidance.

Anxiety about penalty notices may add to existing emotional and practical pressures.

Mitigations

Provide additional signage at all enforced junctions.

Include an accessibility statement in communications, explaining how people can request support or alternative formats.

Make information available in accessible formats, such as Easy Read when requested.

Use plain English in all communications.

Include Parking Projects Email and phone number on Moving Traffic Enforcement webpages, si that people can ask questions.

Ensure the appeals process is clearly explained and accessible.

Issue 6-month warning notices to allow carers and the people they support time to understand and adapt to the new measures.

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.

Implementing Moving Traffic Enforcement within junctions may lead to various negative and positive impacts, such as the following:

Negative impacts

- Care-experienced young people who are unfamiliar with the area may find new junction enforcement measures confusing, increasing the risk of violations.
- Unclear signage or inconsistent enforcement may cause anxiety for young people who already face higher levels of stress or reduced confidence.
- Traffic rerouted from enforced junctions may increase congestion on surrounding roads, affecting carers, foster families, and support workers transporting children.
- Young people who are neurodivergent or experience anxiety or have a history of trauma may find changes to road layouts or enforcement presence unsettling.
- Digital exclusion may limit access to online information about new rules.
- Care Leavers, who often have limited financial resources, may be disproportionately affected by penalty charges.
- Young people without strong support networks may struggle to interpret or challenge enforcement decisions.

Mitigations

- Provide additional signage as needed at enforced junctions.
- Make information available in accessible formats, such as Easy Read, when requested.
- Use plain English in all communications.
- Include Parking Projects email and phone number within Moving Traffic Enforcement webcontent, so that people can call and ask questions.
- Ensure the appeals process is clearly explained and accessible.
- Issue 6-month warning notices to allow young people, carers, and support networks time to understand and adapt to the new measures.

6.14 Homelessness:

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

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

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

Implementing Moving Traffic Enforcement may lead to various negative and positive impacts, such as the following:

Positive impacts:

Safer junctions reduce the risk of collisions for people who walk or move through busy areas, including those who may be sleeping rough or spending long periods outdoors.

Cleaner air and reduced congestion support physical health, particularly for individuals with respiratory conditions or compromised immunity.

Calmer, more predictable traffic environments can reduce stress and anxiety for people who may already be experiencing trauma or instability.

Improved walking routes benefit individuals who rely on walking as their primary mode of travel.

Reduced noise and idling can create a less hostile environment for people sleeping rough near busy junctions.

Negative impacts

- People experiencing homelessness may find new junction restrictions confusing, especially if they have limited access to information.
- Unclear signage or sudden changes may cause anxiety for individuals who already face high levels of stress.
- Increased enforcement presence may feel intimidating, particularly for those who have had negative experiences with authorities.
- Traffic rerouted from enforced junctions may increase noise or congestion in areas where people are sleeping rough or accessing services.
- Digital exclusion may limit access to online information about new rules.
- Individuals with mental health conditions, neurodivergence, or cognitive impairments may struggle to interpret or remember new restrictions.
- People experiencing homelessness may be disproportionately affected by financial penalties, given extremely limited income.

Mitigations

- Provide additional signage as needed at enforced junctions.

- Include Parking Projects email address and number on MTE Junctions Web content, if people have questions.
- Make information available in accessible formats, such as Easy Read when requested.
- Use plain English in all communications.
- Ensure the appeals process is clearly explained and accessible.
- Issue 6-month warning notices to allow individuals and support services time to understand and adapt to the new measures.

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.

Implementing Moving Traffic Enforcement may lead to various negative and positive impacts, such as the following:

Positive impacts

- Safer, calmer junctions reduce the risk of collisions and create more predictable environments, which can be reassuring for survivors who may experience anxiety or hypervigilance.
- Cleaner air and reduced congestion support physical and mental wellbeing, particularly for individuals recovering from trauma or managing long-term health impacts.
- More reliable traffic behaviour can make essential journeys, such as travelling to support services, medical appointments, or safe spaces, feel less stressful.
- Improved walking and wheeling routes benefit survivors who rely on public transport, walking, or support workers for travel.
- Reduced noise and idling can help create less triggering environments for individuals sensitive to loud or sudden sounds.

Negative impacts

- Increased enforcement presence may feel intimidating or triggering for individuals with trauma linked to authority figures.
- Traffic rerouted from enforced junctions may increase noise or congestion in areas where survivors live, travel, or access services.

- Survivors with mental health conditions, neurodivergence, or cognitive impairments may struggle to interpret or remember new enforcement measures.
- Digital exclusion may limit access to online information about new rules.
- Financial penalties may have a disproportionate impact, as survivors are statistically more likely to experience economic abuse, debt, or financial instability.
- People in vulnerable situations may have limited support networks, making it harder to navigate appeals or understand enforcement decisions.

Mitigations

- Provide additional signage as needed at enforced junctions.
- Make information available in accessible formats, such as Easy Read when requested.
- Use plain English in all communications.
- Include Parking Projects email and phone number on Moving Traffic Enforcement web content, so that people can ask questions.
- Ensure the appeals process is clearly explained and accessible.
- Issue 6-month warning notices to allow individuals and support services time to understand and adapt to the new measures.

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.

Implementing Moving Traffic Enforcement may lead to various negative and positive impacts, such as the following:

Positive impacts

Safer junctions reduce collision risks for people who rely on walking, cycling, or public transport.

More predictable traffic behaviour can make everyday journeys, such as commuting, school runs, or accessing services, less stressful.

Improved walking and wheeling routes benefit individuals who cannot afford a car or rely on active travel.

Reduced noise and idling can improve the living environment in lower-income neighbourhoods, which are often located near busy roads.

Negative impacts

People on low incomes may be disproportionately affected by financial penalties, as even small fines can create significant hardship.

Digital exclusion may limit access to online information about new enforcement, appeals processes, or enforcement boundaries.

Unclear signage or inconsistent enforcement may cause stress for people already managing financial or time pressures.

Traffic rerouted from enforced junctions may increase congestion or noise in lower-income areas, which often border major roads.

People with limited access to private vehicles may rely on lift-sharing or informal transport, which could be affected by new measures.

Mitigations

Provide additional signage as needed at enforced junctions.

Include Parking Projects Email and phone number on Moving Traffic Enforcement Web content, to ensure that people can call or email the team with questions.

Make information available in accessible formats, such as Easy Read when requested.

Use plain English in all communications.

Ensure the appeals process is clearly explained and accessible.

Issue 6-month warning notices to allow individuals and communities time to understand and adapt to the new measures.

6.17 Human Rights:

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

Implementing Moving Traffic Enforcement may lead to various negative and positive impacts, such as the following:

Positive impacts
Enforcement can reduce dangerous driving, protecting pedestrians and cyclists, especially in densely populated or disadvantaged areas.

By reducing congestion and emissions, enforcement supports cleaner air and healthier living conditions.

Negative impacts
Fixed fines can disproportionately affect low-income individuals, potentially violating principles of fairness and equality.

Individuals from disadvantaged backgrounds may struggle to appeal fines or understand enforcement procedure.

Mitigations
Implement 6-month warning notices and include accessible information on junctions to help people learn about the new measures.

Include links to Brighton Council Website on how to apply for an appeal.

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

People who belong to more than one minoritised or disadvantaged group may experience **compounded, overlapping, or intensified impacts** from Moving Traffic Enforcement at junctions.

Cumulative and intersectional impacts

Individuals who hold multiple identities, such as disabled Gypsy, Roma and Traveller community members, LGBTQIA+ Black and Racially Minoritised people, older disabled trans and

non-binary people, or young autistic people, may face heightened barriers due to the interaction of discrimination, marginalisation, and practical access requirements. For these groups:

- Increased enforcement presence may feel intimidating or triggering for people with a history of trauma, including survivors of abuse, people with experience of the criminal justice system, or those who have faced discrimination from authorities.
- Digital exclusion may limit access to online information about new rules, appeals, or enforcement boundaries.
- Financial penalties may disproportionately affect people on low incomes, lone parents, people experiencing homelessness, or those facing socio-economic disadvantage.
- People who are housebound or rely on carers may be indirectly affected if support workers face delays or confusion navigating new junction enforcement measures.
- People with addiction or substance use disorders (SUD) may experience increased anxiety or reduced ability to navigate complex signage or enforcement rules (for example potential additional signage).
- Sex workers, who often work at night or travel irregular routes, may be disproportionately affected by changes to predictable traffic patterns.
- Ex-offenders or people with unrelated convictions may feel heightened anxiety around enforcement activity due to past experiences with authority.
- People who have experienced female genital mutilation (FGM), human trafficking, or modern slavery may be particularly sensitive to environments that feel controlled, unpredictable, or heavily monitored.

Cumulative and intersectional impacts

Individuals who hold multiple identities - such as disabled Gypsy, Roma and Traveller community members, LGBTQIA+ Black and Racially Minoritised people, older disabled trans and non-binary people, or young autistic people - may face heightened barriers due to the interaction of discrimination, marginalisation, and practical access needs. For these groups:

- Increased enforcement presence may feel intimidating or triggering for people with trauma histories, including survivors of abuse, people with experience of the criminal justice system, or those who have faced discrimination from authorities.
- Digital exclusion may limit access to online information about new rules, appeals, or enforcement boundaries.
- Financial penalties may disproportionately affect people on low incomes, lone parents, people experiencing homelessness, or those facing socio-economic disadvantage.
- Environmental and mobility barriers may compound difficulties for people with sight loss, D/deafness, sensory sensitivities, or complex disabilities.
- People who are housebound or rely on carers may be indirectly affected if support workers face delays or confusion navigating new junction restrictions.
- People with addiction or substance use disorders (SUD) may experience increased anxiety or reduced ability to navigate complex signage or enforcement rules.
- Sex workers, who often work at night or travel irregular routes, may be disproportionately affected by changes to predictable traffic patterns.
- Ex-offenders or people with unrelated convictions may feel heightened anxiety around enforcement activity due to past experiences with authority.

- People who have experienced FGM, human trafficking, or modern slavery may be particularly sensitive to environments that feel controlled, unpredictable, or heavily monitored.

Wider systemic and structural barriers

People living with multiple disadvantages often face **compounded structural inequalities**, including:

- Lower access to private vehicles.
- Higher reliance on walking, public transport, or informal travel arrangements.
- Greater exposure to unsafe or polluted environments.
- Reduced access to information due to literacy, language, or digital barriers.
- Higher levels of stress, trauma, or instability.
- These factors can intensify the impact of any transport-related change, including MTE at junctions.

Overall assessment

While Moving Traffic Enforcement at junctions can bring significant safety benefits, intersectional groups may experience greater challenges in understanding, adapting to, or navigating the changes. These cumulative impacts highlight the need for:

- Include Parking Projects email and phone number on Moving Traffic Enforcement Junctions web content, so that people can ask questions.
- Visual and Easy Read materials when requested.
- Trauma-informed approaches to enforcement.
- Engagement with community organisations supporting minoritised and vulnerable groups.
- Sufficient adjustment periods, such as warning notices.
- Accessible routes for feedback and appeals.
- To alleviate people's surveillance anxiety, we will make it clear to the public that the camera enforcement system will capture the details of vehicles contravening the restrictions, but no other data will be retained and that our enforcement priority will be solely on the road restrictions.
- Privacy masks, to obscure specific areas can also be situated over any nearby properties when requested by residents.
- This ensures that the benefits of safer, calmer junctions are realised without deepening existing inequalities.

7. Action planning

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

- Summarise relevant SMART actions from your data insights and disproportionate impacts below for this assessment, listing appropriate activities per action as bullets. (This will help your Business Manager or Fair and Inclusive Action Plan (FIAP) Service representative to

add these to the Directorate FIAP, discuss success measures and timelines with you, and monitor this EIA's progress as part of quarterly and regular internal and external auditing and monitoring)

SMART Action 1: Ensure that introduction of Moving Traffic Enforcement (MTE) at junctions is clear, timely, and accessible

Activities:

To support all residents, particularly those with access requirements, language barriers, or limited digital skills, Brighton & Hove City Council will:

Identify any disproportionate impacts and barriers to access experienced by residents and road users in relation to the introduction of automatic enforcement measures, focusing on whether information, signage and supporting communications are sufficiently clear, accessible and inclusive to ensure that all road users have an equal opportunity to understand and comply with the existing traffic restrictions, which apply to all drivers.

- Ensure that information and communications about the new automatic enforcement measures are available in accessible formats such as for example large print, Easy Read or British Sign Language (BSL) and variety of languages when requested.
- Use plain English in all communications.
- Include Parking Projects email and phone number on Moving Traffic Enforcement Junctions web pages so that people can call and ask questions.
- Translate key information and materials into community languages when requested.
- Implement a grace period with warning notices before full enforcement begins.
- Ensure the PCN appeals process is clearly explained, accessible, and easy to navigate.

These actions ensure that residents understand the changes at junctions and can adapt without unnecessary stress or disadvantage.

SMART Action 2: Monitor the impact of Moving Traffic Enforcement at junctions

Activities

To ensure the scheme is fair, inclusive, and responsive to community needs, Brighton & Hove City Council will:

- Track feedback, complaints, and appeals related to MTE at junctions by protected characteristic (where disclosed) to identify underrepresented or disadvantaged groups.
- Analyse complaints and concerns to identify systemic barriers or recurring issues.
- Roll out MTE at junctions incrementally to allow Brighton and Hove residents and businesses to get used to the new measures put in place and the council to review impacts, identify barriers, and adjust communications and support to ensure equitable access for all groups.

This monitoring will help the council identify and address any unintended negative impacts of the new enforcement measures on protected or vulnerable groups.

SMART Action 3: Introduce a warning period

Implement a six-month warning period during which drivers receive warning notices rather than penalties.

Use this period to help residents understand the new junction enforcement measures and adapt their travel behaviour.

Review feedback and data collected during the warning period to refine communications, signage, and support.

This approach ensures residents have adequate time to adjust before enforcement begins.

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.

- Team Plan
- Project Plan relating to this EIA
- A post implementation survey will not be taking place.

8. Outcome of your assessment

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

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

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

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

9. Publication

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

10. Directorate and Service Approval

Signatory:	**Name and Job Title:**	**Date:** DD-MMM-YY
Responsible Lead Officer:	Tamara Farragher Parking Projects Officer	5th October 2026
Accountable Manager:	Peter Turner Senior Parking Projects Team Manager	12th October 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 Business Partner to cross-check against aims of the equality duty, public sector duty and our civic responsibilities the activity considers and refer to relevant internal checklists and guidance prior to recommending sign-off.

Once the EDI Business Partner has considered the equalities impact to provide 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 EDI Manager and Head of Service level approval via different templates.

Signatory:	**Name:**	**Date:** DD-MMM-YY
EDI Business Partner:	Zofia Danin	1-Oct-26
EDI Manager:		

Notes and recommendations from EDI Business Partner reviewing this assessment:

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

Notes and recommendations (if any) from Head of CETS Service reviewing this assessment:

Brighton & Hove City Council

Cabinet Agenda Item 90

Subject: School Admission Arrangements 2028-29

Date of meeting: 12 November 2026

Report of: Cabinet Member for Finance and City Regeneration

Lead Officer: Deb Austin, Corporate Director for Families, Children and Wellbeing

Contact Officer: Richard Barker, Head of Education

Email: richard.barker@brighton-hove.gov.uk

Ward(s) affected: All Wards

Key Decision: Yes

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

For general release

1. Purpose of the report and policy context

1.1 This report details the proposed school admission arrangements for the academic year 2028-29 for the schools in the city where the council is the admission authority.

1.2 When changes are proposed to admission arrangements, all admission authorities must consult on those new arrangements.

1.3 The Council Plan includes a focus on creating a healthy city that helps people thrive through delivering a better future for children and young people. The council is supporting the provision of high quality and inclusive education through its school admission arrangements for primary and secondary aged pupils.

1.4 Cabinet are asked to approve a consultation on the proposals set out in this report. A further report will be presented to Cabinet on 11 February 2027 seeking determination of the admission arrangements for 2028-29.

1.5 Local authorities must also set out schemes for coordinated admissions, including key dates in the admission process and arrangements for consultation with own admission authority schools in the city and with other local authorities. They must also establish the area (the “relevant area”) within which the admission consultation should take place.

2. Recommendations

2.1 Cabinet agrees to make no changes to the council's admission arrangements other than the changes listed below.

2.2 Cabinet agrees to consult upon a change to the Published Admission Number (PAN) of Brunswick Primary School from 90 to 60 pupils from September 2028.

2.3 Cabinet agrees to consult upon a change to the Published Admission Number (PAN) of Coldean Primary School from 60 to 30 pupils from September 2028.

2.4 Cabinet agrees to note the binding decision of the Schools Adjudicator in determining the secondary school admission arrangements for September 2027, that inform the arrangements in place for September 2028. Including clarification on the category of Free School Meals eligible for priority and the proportion of places available, following changes introduced by the Department for Education in the summer after the arrangements were determined by Full Council in January 2026.

2.5 Cabinet agrees to consult on the Primary and Secondary coordinated schemes and to make no changes to the "relevant area".

3. Context and background information

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

3.2 Consultation and determination of admission arrangements takes place approximately 18 months in advance of the academic year to which they apply. The consultation must last for a minimum of six weeks and take place between 1 October and 31 January.

3.3 It is proposed to start the consultation on 23 November 2026 and for it to run for seven weeks, concluding on 10 January 2027. The consultation period includes three Bank Holidays.

3.4 Following the consultation, the council must determine its admission arrangements by 28 February 2027 to conform to the requirements of the School Admissions Code.

3.5 A further report will be presented to Cabinet on 11 February 2027 detailing the response to the consultation and making recommendations about the admission arrangements for 2028-29.

3.6 The relevant proposed papers for the 2028-29 admission year for the city of Brighton & Hove are listed in the appendices to this report.

3.7 The Schools Adjudicator made a determination on the admission arrangements for September 2027 on 19 October 2026 and the published report can be found here. The Adjudicator found that the arrangements, which included the extension of a criterion for siblings to apply to applications from anywhere in the city, not just the school's catchment area, to be reasonable and fair. The report also outlined where changes were required to be made in relation to the admission arrangements and the process used to allocate places.

3.8 This follows the Adjudicator's determination of the September 2026 arrangements on the 20 October 2025 which can be found here. That decision confirmed that the changes which had been introduced: bringing in an open admission criterion and the original free school meal priority were also reasonable and fair.

3.9 It has been these recent changes to the admission arrangements which have resulted in Brighton & Hove City Council being awarded the Sutton Trust Fair School Admissions Gold Award for two consecutive years. The Sutton Trust is an educational charity that aims to improve social mobility and address educational disadvantage across the UK and the gold award is the highest level of recognition given to local councils, multi-academy trusts and schools that have made significant changes to their school admissions policies to ensure all pupils have fair access to education, regardless of socio-economic background.

Published Admission Numbers

3.10 Schools are funded by the government and not by the council. Funding is largely allocated on a per-pupil basis, and nearly all of it covers staffing costs. If schools do not have enough pupils attending, or experience fluctuating pupil numbers, they may not be able to operate in a financially efficient way and may risk entering a budget deficit.

3.11 The council keeps the supply of school places under review. Planned reductions in PAN can support schools to organise classes and staffing on a sustainable basis, while the council must continue to ensure that sufficient places are available and that families have a reasonable choice of schools.

3.12 Once admission arrangements have been determined for a particular school year, they cannot normally be revised unless a major change in circumstances is considered to have occurred and the proposed variation is approved by the Schools Adjudicator. It is therefore important that foreseeable PAN changes are considered through the annual consultation process.

3.13 Where a change in PAN could be considered possible, Governing Boards have been consulted on their support for a change. Where there has not ben agreement, the council has decided to follow the wishes of the governing boards who are best placed to determine how to manage arrangements without financial deficit and to have weighed up the risk involved in potentially relying on a request for a variation that may not be agreed.

3.14 It is proposed to reduce the PAN at Brunswick Primary School from 90 to 60 pupils from September 2028. The school's PAN was set at 60 pupils in 2026 and in 2027 by the Schools Adjudicator and this proposal is a continuation of that number.

3.15 It is proposed to reduce the PAN at Coldean Primary School from 60 to 30 pupils from September 2028. The proposal is intended to align the number of available places more closely with anticipated demand and to support sustainable class organisation and financial planning. This follows a successful request for a variation for September 2027 where the PAN was reduced from 60 to 30.

3.16 The proposals in this report are supported by the governing boards of the affected schools.

Free school meals priority

3.17 From the start of the 2026/27 academic year, the Department for Education has introduced changes that distinguish between 'targeted' free school meals, where a child qualifies for free meals and attracts pupil premium funding, and 'expanded' free school meals, where a child qualifies for a free meal but does not attract pupil premium funding.

3.18 The Admissions Code only permits free school meals to be used as an admission criterion when it attracts pupil premium.

3.19 The Council intended to reflect the changes introduced by the DfE as part of the consultation on changes to admission arrangements from September 2028. However, in the School Adjudicator determination in October 2026 for September 2027 the Adjudicator has provided the clarity needed and brought in the necessary changes to reflect the DfE's policy changes.

3.20 As a result of the Adjudicator finding that the September 2027 arrangements did not conform to the requirements of the Code, the wording of the arrangements has been changed to take effect for the September 2027 admission round and will remain in place for the September 2028 round as well.

3.21 As outlined in Appendix 2, the arrangements now state:

Criterion 4 - Children living within the school's catchment area and eligible for Targeted Free School Meals up to the city average. (note d)

Criterion 5 - Other children eligible for Targeted Free School Meals, up to the city average. (note d)

The explanatory note explains that children will be considered under these criteria if they are eligible for targeted free school meals on the closing date for applications or on the date the application is submitted if it is late or outside the main admission round.

It goes on to confirm that the city average will be taken as the average percentage of children eligible for targeted free school meals for the applying cohort (this will be Y6 pupils for the main admissions round) taken from the October school census in the application year. The number of places available at each school under criterion 4 will be calculated by applying the city average to the school's PAN and subtracting the number of places offered to pupils eligible for targeted free school meals under criteria 1,2 and 3. The number of places available under criterion 5 will be calculated by applying the city average to the schools PAN and subtracting the number of places offered to pupils eligible for targeted free school meals under criteria 1,2,3 and 4.

3.22 Due to the Adjudicator's determination, there is no consultation on this element of the admission arrangements for September 2028. The consultation will allow for responders to comment on all aspects of the arrangements being proposed for September 2028.

Coordinated schemes and relevant area

3.23 The council is required to agree coordinated schemes for primary and secondary admissions. These set out how applications and offers are coordinated between admission authorities and neighboring local authorities, including the key dates in the process.

3.24 It is proposed to consult on the coordinated schemes for 2028-29 and to retain the relevant area as the geographical boundary of the city.

4. Analysis and consideration of alternative options

4.1 The council could propose making further changes to its admission criteria through the consultation process; the arrangements, following the changes required in the recent Adjudicator's determination are lawful, and no other change is currently considered to be required.

4.2 The council could seek to make no change to the PAN of any school or put forward a change against the wishes of the governing board. Whilst making no change to PAN would help the council to meet a greater level of parental preferences, it will provide more uncertainty for schools in their planning and could place more schools at risk of financial difficulty. To put forward a change that is not supported by a governing board would place the council at odds with the view of those who have delegated authority to oversee the school's operation and especially the school's budget.

4.3 The council could change the proportion of secondary places prioritised for children eligible for free school meals due to the change in eligibility for these criteria. However, as the Adjudicator outlined in their recent report, if the Council intended the criterion to apply to all children eligible for FSM or similar, a further question would arise as to compliance with the School Admissions Code.

4.4 All admission authorities must consult where they propose a change to their admission arrangements, including a decrease in PAN. Community schools and other interested parties retain the right to object to the Schools Adjudicator following determination of the arrangements.

5. Community engagement and consultation

5.1 If approved, the consultation will run from 23 November 2026 to 10 January 2027, a period of seven weeks. The consultation will cover the proposed PAN reductions, the technical free school meals amendment, the coordinated schemes and the relevant area.

5.2 The consultation will be published on the council's Your Voice consultation portal. Headteachers, governing boards, other admission authorities, neighboring local authorities and other interested parties will be notified.

5.3 It is proposed that there will be 2 engagement events held online, which reflect the relative impact of the proposed changes.

5.4 Presently, it is expected that events will take place at the following times:

Coldean Primary School focused events
Online Wednesday 25 November - 6pm
Meeting link:
https://teams.microsoft.com/meet/3191638950624778?p=eP4C7MpJ0uAZRD8Zsn

Brunswick Primary School focused event
Online Tuesday 1 December - 6pm
Meeting link:
https://teams.microsoft.com/meet/3668591729215427?p=9ggXYHERTStpC6NdFV

5.5 Interested parties unable to submit a response online will be able to contact the School Admissions team for assistance in recording their response.

5.6 Attention will be given to engaging sections of the community who may be less likely to participate in public consultations, including people with protected characteristics and those who may experience barriers to accessing or understanding the consultation material.

6. Financial implications

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

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

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

Name of finance officer consulted: Steve Williams Date consulted: 12/10/26

7. Legal implications

7.1 Section 88C of the School Standards and Framework Act 1998 and the School Admissions (Admissions Arrangements and Co-ordination of Admission Arrangements) Regulations 2012 require admission authorities to determine their admission arrangements annually. Arrangements must be determined 18 months in advance of the academic year to which they apply.

7.2 Where changes such as a decrease in the PAN are proposed the admission authority must first publicly consult on those proposed arrangements. The School Admissions Code 2021 states that consultation must be for a minimum of six weeks and must take place between 1 October and 31 January of the school year before those arrangements are to apply. The admission arrangements must be determined by 28 February in the determination year. The arrangements for the admission year 2028/2029 must therefore be determined by 28 February 2027.

7.3 Community schools and other interested parties have the right to object to the Schools Adjudicator if the PAN set for them is lower than they would wish. The School Admissions Code provides that there is a strong presumption in favour of an increase to the PAN to which the Schools Adjudicator must have regard when considering such an objection. For this determination year any objections to the arrangements must be referred to the Adjudicator by 15 May 2027.

7.4 Admissions arrangements must comply with the Code. Under the admissions code admission authorities may give priority in their oversubscription criteria to children eligible for the early years pupil premium, the pupil premium and also children eligible for the service premium. Eligibility for the pupil premium is currently linked to the Targeted Free School Meals (FSM) category only, not the Expanded FSM category per the previously published admissions criteria. This means that to be compliant with the code the admissions arrangements needs to refer specifically to Targeted FSM eligibility rather than FSM eligibility generally.

7.5 The report sets out that the city average for targeted FSM eligibility previously published as being taken as 30%, will need to be adjusted in due course to reflect the city-wide eligibility for Targeted FSM when those figures are known.

7.6 Once admission arrangements have been determined, Admission Authorities may propose variations where they consider such changes to be necessary in view of a major change in circumstances. Such proposals must be referred to the Schools Adjudicator for decision following consultation with the governing board of the affected schools.

Name of lawyer consulted: Natasha Watson Date consulted: 20/10/2026

8. Risk implications

8.1 The proposals set out in this report are considered to present a relatively low level of risk. The proposed changes are limited in scope and do not represent significant changes to the overall admission arrangements operating across the city. They are summarised in the table below.

Risk	Reason for risk	Mitigation
PAN reduction	Reduces parental preference	The council's forecasts have been to be robust and there are sufficient places to ensure the council fulfils its statutory duty to ensure all pupils have a school place. The Home to School transport policy reflects the statutory requirements and can support families as appropriate.
PAN reduction	No change in numbers admitted in September 2028	Under Infant Class Size legislation schools can have a maximum of 30 pupils taught by one teacher. Should a school not reduce its PAN and have low pupils numbers in classes this will be a

		pressure on the school's budget. Changes are therefore consulted upon. There is limited additional Schools Block funding available to support a school with low pupil numbers. This should therefore not be relied upon to support a school.
Changes to FSM criterion	The Council could propose changes to admission arrangements that do not adhere with the recent Adjudicator ruling, which would potentially subject the arrangements to further objection and the potential of being found not in compliance with the School Admissions Code.	The Council has implemented the changes required in the Adjudicator's determination and maintain these changes in the proposed arrangements for September 2028.

8.2 There is a risk that the proposed reductions in the Published Admission Numbers at Brunswick Primary School and Coldean Primary School could reduce parental preference options in some areas of the city. However, the proposed PAN reductions reflect sustained patterns of demand, support the efficient use of school places and will assist the affected schools in planning staffing and financial resources on a more sustainable basis. The council's pupil forecasts indicate that sufficient school places will remain available across the city if the proposals are implemented.

8.3 The amendment to the free school meals admission priority is a required change following the determination of the Schools Adjudicator that will apply for September 2027 and September 2028. Any proposal to consider the proportion of places available unrelated to the city average of 'targeted' FSM numbers could be questioned in relation to its compliance to the School Admissions Code.

8.4 Officers will continue to monitor pupil numbers, parental preferences and the availability of school places across the city. Should future circumstances change significantly, the School Admissions Code provides mechanisms through which admission arrangements may be varied, subject to the approval of the Schools Adjudicator where required.

9. Equalities implications

9.1 An Equality Impact Assessment (EIA) on undertaking a public consultation has not been completed at this stage. The council has undertaken extensive public consultation on school admission arrangements in recent years and

understands the public sector equality duties associated with such consultation.

9.2 The consultation process will take account of; young parents who may be less likely to respond, issues of accessibility and comprehension of the consultation process, the materials made available, and the need for the subsequent decision-making process to consider the substance and not simply the quantity of responses.

9.3 An EIA will be prepared following the public consultation and before recommendations are made on the admission arrangements to be determined for September 2028.

9.4 When determining admission arrangements, the council must ensure that sufficient school places remain available within a reasonable distance, including for families whose members have special educational needs or disabilities, speak English as an additional language or are from different racial or ethnic groups.

9.5 The proposed technical amendment to the free school meals priority will be considered carefully through the consultation and EIA, including its potential effect on economically disadvantaged children and families.

10. Sustainability implications

10.1 Wherever possible the council aims to reduce the number of journeys to school undertaken by car. A reduction in the availability of school places across the city could risk a rise in the number of journeys undertaken by car.

10.2 Schools are expected to have a School Travel Plan to:

- reduce the number of vehicles on the journey to school
- improve safety on the journey to school
- encourage more active and sustainable travel choices

10.3 Any change in PAN is expected to require the school's travel plan to be re-written to take account of the change.

10.4 Changes to PAN, which lead to a reduction in the number of classes the school has and the classrooms being used can lead to areas of a school being more efficiently managed in relation to energy use at a time of uncertain energy costs for schools.

11. Health and Wellbeing Implications:

11.1 The council plan 2023 to 2027 states that: "council strategies, policies and services should promote better health and wellbeing for all and reduce unfair differences between the most and least healthy."

11.2 The allocation of school places can impact on the health and well-being of children and young people as well as their families. The offer of a school place will have an implication fo the journey to school that is needing to be

undertaken and these travel arrangements may have a positive or negative impact on those who have to undertake them.

11.3 The council's home to school transport policy provides at least the statutory minimum provision of support for travel. An application can be used by families who consider that the travel arrangements may negatively impact on their health.

11.4 Being given more opportunity to secure a school place in a school that is not in your catchment area could have a positive impact on the health and well-being of those living in single school catchment areas. Notwithstanding that the potential of not obtaining a place in your catchment area school may impact negatively on those who are affected.

11.5 The admission appeal process allows for an independent panel to consider the circumstances in relation to an individual pupil and consider circumstances that fall outside of the criteria of the admission arrangements.

12 Other Implications

12.1 There are no direct procurement, crime and disorder, public health or corporate parenting implications arising solely from the decision to consult. Any relevant implications identified through consultation will be addressed in the report seeking determination of the arrangements

13 Conclusion

13.1 It is proposed to make no changes to admission arrangements (other than the ones outlined in the report) and to undertake a public consultation with the results and final recommendations coming back to Cabinet on 11 February 2027.

13.2 It is proposed that the Published Admission Number for Coldean Primary School is reduced from 60 places to 30 places.

13.3 It is proposed that the Published Admission Number for Brunswick Primary School is reduced from 90 places to 60 places.

13.4 Cabinet are asked to note the changes that have been implemented as a result of the School Adjudicator's determination in relation to secondary school admission arrangements. The determination is binding on the Council and is required to have been made by 31 October 2026. These changes will then apply to the 2028 admission arrangements as well.

13.5 Once the arrangements for September 2028 are determined, it is possible for a variation to be requested of the Schools Adjudicator for other schools should there be a major change in circumstances. Any future decision will be informed by the pattern of parental preference for September 2028, changes of strategic direction by schools in the city and the results of future financial planning.

Supporting Documentation

1. Appendices

1. Published Admission Numbers for Primary and Secondary schools 2028-29.
2. Admission arrangements and priorities for community primary and secondary schools 2028-29.
3. Primary coordinated scheme for admissions 2028-29.
4. Secondary coordinated scheme for admissions 2028-29.
5. Primary school pupil forecast.
6. Secondary school pupil forecast

Proposed Primary Admissions Numbers 2028/29	Planned Admission No. 2028-29
Name of School	
Aldrington CE Primary	60
Balfour Primary	90
Benfield Primary	30
Bevendean Primary	60
Bilingual Primary	90
Brunswick Primary	60
Brackenbury Primary	30
Carden Primary	60
Carlton Hill Primary	30
City Academy Whitehawk	60
Coldean Primary	30
Coombe Road Primary	30
Cottesmore St Marys Catholic	60
Downs Infant	90
Downs Junior	96
Elm Grove Primary	60
Fairlight Primary	60
Goldstone Primary	90
Hangleton Primary	60
Hertford Primary	30
Hove Junior School (Holland Road)	64
Hove Junior School (Portland Road)	128
Mile Oak Primary	60
Moulsecoomb Primary	30
Our Lady of Lourdes	30
Patcham Infant	90
Patcham Junior	96
Peter Gladwin Primary	30
Queens Park Primary	60
Rudyard Kipling Primary	30
Saltdean Primary	60
St Andrew's CE Primary	90
St Bernadette's Catholic Primary	30
St John The Baptist Catholic Primary	30
St Lukes Primary	90
St Margaret's CE Primary	30
St Mark's CE Primary	30
St Martin's CE Primary	30
St Mary Magdalen Catholic Primary	30
St Mary's Catholic Primary	30
St Nicolas CE Primary	60
St Paul's CE Primary	30

Stanford Primary	**30**
West Blatchington Primary	**30**
West Hove Infant (Portland Road)	**120**
West Hove Infant (Holland Road)	**60**
Westdene Primary	**60**
Woodingdean Primary	**60**
Secondary Admission Numbers 2028-29	
Name of school	**Planned admission no. 2028-29**
Brighton Aldridge Community Academy	**180**
Blatchington Mill	**330**
Cardinal Newman Catholic	**360**
Dorothy Stringer	**330**
Hove Park	**180**
King's	**180**
Longhill High	**210**
Patcham High	**225**
Portslade Aldridge Community Academy	**220**
Varndean	**300**

Proposed Admission Arrangements for Brighton & Hove Schools 2028/29

Admission Arrangements for Secondary Schools

The Council uses a catchment area system with random allocation being used as the tie breaker in each admission criteria in the event of oversubscription. Cardinal Newman Catholic School, King's School, Brighton Aldridge Community Academy (BACA) and Portslade Aldridge Community Academy (PACA) have their own admission criteria (please visit www.brighton-hove.gov.uk/schooladmissions or the schools' websites for details).

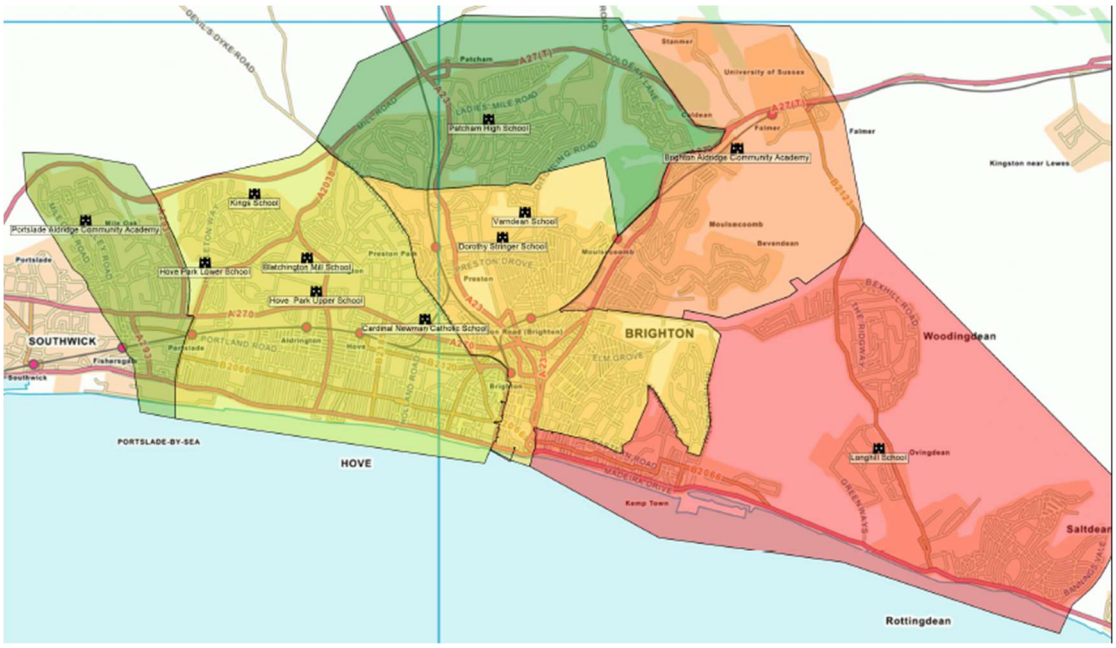
If a school is oversubscribed, after the admission of pupils with an Education, Health and Care Plan where the school is named in the Plan, priority for admission will be given to those children who meet the oversubscription criteria set out below.

The oversubscription criteria are applied in the context of an equal preference system as required by the School Admissions Code. They are:

1. Looked after children and all previously looked after children, including those children who appear (to the council) to have been in state care outside of England and ceased to be in state care as a result of being adopted. (*note a)*
2. Compelling medical or other exceptional reasons for attending the school. (*note b)*
3. Sibling link. (*note c)*
4. Children living within the school's catchment area and eligible for Targeted Free School Meals up to the city average. (*note d)*
5. Other children eligible for Targeted Free School Meals, up to the city average. (*note d)*
6. Children living outside the school's catchment area but within the catchment area for BACA, PACA, Patcham or Longhill up to 5%. (*note g)*
7. Pupils living in the designated catchment area for the school(s).
8. Other children.

Within all these priorities, the tie break is random allocation. (note f)

The catchment areas are set out in the catchment area map below. There is information below (note h) about which postcodes/addresses are in each of the catchment area.



Admissions Arrangements for Community Infant, Junior and Primary Schools

Parents must make a separate application for any transfer from nursery to primary school and from infant to junior school. If a school is oversubscribed, after the admission of pupils with an Education, Health and Care Plan where the school is named in the Plan, priority for admission will be given to those children who meet the oversubscription criteria set out below.

The oversubscription criteria are applied in the context of an equal preference system as required by the Admissions Code. They are:

1. Looked after children and all previously looked after children, including those children who appear (to the council) to have been in state care outside of England and ceased to be in state care as a result of being adopted. (*note a)*
2. Compelling medical or other exceptional reasons for attending the school. (*note b)*
3. Sibling link. (*note c)*
4. For junior schools only: children attending a linked infant school. (*note e)*
5. Other Children.

Within all these criteria, the tie break is home to school distance which will be measured by the shortest route from the child's home to the nearest of the school's gates. This will be measured by specialist computer software based on Ordnance Survey data. It measures using the road network supplied by Ordnance Survey and some other public rights of way which are paved and lit. Routes across public parks or open spaces will not be accepted. When using roads for measurement purposes the computer measures along the middle of the road. It measures from the address point in the property to the nearest point on the road network and from there to the nearest of the school's gates to the child's home. No other measurement systems will be used for school

admissions decisions. Where the home addresses of two or more pupils are an equal distance from the school (e.g. two children living in the same block of flats) and only one place remains available at the school in question, the place will be allocated randomly by computer to one of these pupils. (note f)

Late applications

If an application is returned after the closing date without good reason it will be considered after all the on-time preferences have been dealt with and school places allocated to them.

If there is a good reason for the application being late, such as a recent house move to Brighton & Hove, it will be considered as on-time if it is received by 22 January (Secondary) or 8 March (Infant, Primary & Junior) and is accompanied by independent supporting evidence demonstrating why the form is late, e.g. solicitor's letter confirming completion or a recently signed tenancy agreement.

Applications submitted after the closing date listing revised preferences will only be considered from mid-June onwards **unless** there has been a house move. This is to ensure that parents and carers who do this do not gain an unfair advantage over others by having the opportunity to list more than four preferences.

Home Address –

The school admissions team will allocate school places using the address at which a child lives on the closing date for applications 31 October (Secondary) or 15 January (Infant, Primary & Junior) although late changes of address will be considered if proof of address is received by 22 January (Secondary) or 8 March (Infant, Primary & Junior).

Only one address can be used for admission purposes, and this will be taken as the address where the child spends most of their time. Where a child's time is equally divided between addresses, parents must agree which address they would like to be considered for the purposes of the application. In the event of a dispute, in the absence of a relevant court order, the admission authority will make a judgement about which address applies. This will usually be the address where the child is registered with a doctor.

Deferred admission

Children start school in the school year during which they have their fifth birthday. Children are allowed to start full-time in September or can defer admission or attend part-time until they reach compulsory school age. Children become compulsory school age in the term after their fifth birthday. Children whose fifth birthday falls between 1 September and 31 December may defer or attend part time until January. Children whose fifth birthday falls between 1 January and 31 March can defer admission or attend part time until the start of the summer term. Children whose fifth birthday is between 1 April

and 31 August don't become compulsory school age until the following September however they can also defer admission or attend part time until the start of the summer term. Where a place is deferred it will not be given to another child provided the place is taken up by the beginning of the school term following the child's fifth birthday and within the school year that the offer was made.

Parents can request for a 'summer born' child to start school **outside of their normal age group,** and be admitted to reception rather than Year 1 as detailed below.

Admission outside a normal age group

Parents may request that their child is admitted outside their normal age group, for example, if the child is gifted and talented or has experienced problems such as ill health. To do so, parents should include a request with their application, specifying why admission outside the normal age group is being requested and which year group they wish their child to be admitted.

Applications should be accompanied with the additional form to request that the child is educated out of year group. Reasons for the request and any evidence to support the case should be included with the form. Evidence could include: information about the child's personal, social, emotional development and academic development; If relevant, medical history and views of a medical professional; whether the child has previously been educated out of year group and whether the child was born prematurely.

The admission authority will consider each case on its merits taking into account the child's best interests and either agree or refuse the request on that basis. Where the council is the admission authority, the views of the headteacher of each school will be sought before a decision is taken. Parents will be made aware of the outcome of the request for admission out of year group before national offer day and reasons for the decision will be shared with them. Late requests will be considered up until 8 March (Infant, Primary and Junior) or 22 January (Secondary) if there is good reason why the request could not be made by the closing date for applications. Requests made after this date will not be considered until after national offer day.

Waiting lists

The council holds waiting lists for community schools, and the following Academies/Free Schools: Benfield Primary School, Bilingual Primary School, Coombe Road Primary School Hangleton Primary School, Moulsecoomb Primary School, West Blatchington Primary School and Woodingdean Primary School. Pupils will be added to the waiting list for any oversubscribed school they have been refused a place at if it was a higher ranked preference than the allocated school. Parents can request that their child's name be added to the waiting list for any of their other schools of preference by contacting the school admissions team.

Waiting lists are held until 31 December at which point pupils' names will be removed from the list. Parents can keep their child's name on the waiting list for the following term by contacting the admissions team in the last week of each term to request this. Pupils are added to waiting lists according to the oversubscription priorities listed above (or the schools oversubscription criteria if they are an Academy/Free School) and consequently a pupil's name can move down the list as well as up.

When a pupil is added to a waiting list, the list will be ranked again in line with the published oversubscription criteria and priority will not be given to children based on the date their name was added to the list. Looked after children or previously looked after children allocated a place at the school in accordance with a Fair Access Protocol must take precedence over those on a waiting list.

Where the home addresses of two or more pupils at the top of an infant, primary or junior school waiting list are an equal distance from the school (e.g. two children living in the same block of flats) and only one place has become available at the school in question, the place will be allocated randomly by computer to one of these pupils (note f).

Waiting lists for secondary schools are called reallocation pools. Each time the council is able to offer a place, or places at a school with a reallocation pool, the list is re-randomised within each criterion and the place(s) allocated to the child(ren) at the top of the list. If a child is offered a place from the reallocation pool, the parent/carer will be given 7 days to accept or decline the offered place.

Late applicants will also be added to waiting lists as soon as possible after they apply. Late changes of preference (revised applications) will be added to the waiting list for the new preference as soon as possible from mid-June onwards. The pupil's name will be removed from the waiting list for the previous preferences.

Notes:

a) **Looked after and previously looked after children -** A 'looked after child' is a child who is (i) in the care of a local authority, or (ii) being provided with accommodation by a local authority in the exercise of their social services functions at the time of making an application to a school. Previously looked after children are such children who were adopted (or subject to child arrangements orders or special guardianship orders) immediately following having been looked after and those children who appear (to the council) to have been in state care outside of England and ceased to be in state care as a result of being adopted. A child is regarded as having been in state care outside of England if they were in the care of or were accommodated by a public authority, a religious organisation, or any other provider of care whose sole or main purpose is to benefit society.

b) **Exceptional Circumstances -** This criterion applies to pupils with a specific need that can only be met by one school rather than any other. This could include medical or social reasons that make it essential for

the child to attend a particular school. Independent supporting information (this could be a report or an assessment for example that specifies why the child's needs can only be met at one school) must be provided from a professional, for example a doctor, consultant, mental health practitioner, social worker or other professionals working with the family which makes a compelling case as to why the child's needs can only be met at the preferred school and no other. A medical condition or diagnosis in itself will not automatically result in priority being given. Advice will be sought from a panel of relevant professionals where necessary to determine whether or not the evidence provided is sufficiently compelling to qualify under this category.

c) **Sibling link** - For the purposes of the school admissions process, children are siblings if they share the same main address and live as part of the same household. A sibling link will apply if the sibling will be attending the school in September 2028. Where separate junior and infant schools are linked (see linked Infant/Junior school below), the sibling link will apply across both linked schools the sibling may be at either school and may be older or younger. If two children, of whom one is due to start junior school and the other infant school in the same September, the junior school child's allocation will be done first and a sibling link will count for the infant child.
A sibling link is only taken into account if children live at the same main address and the sibling is attending the school or has been allocated a place at the school when your child is due to start. For the sibling link to be considered for national offer day allocations, the siblings must have been allocated a place at the school by 22 January (secondary) or 8 March (Infant, Junior & Primary). Twins or multiple births do not qualify for the sibling link unless one child has already been offered a place. Where a sibling attends a nursery class on the same school site, or a sixth form it will not be counted as a link for admissions purposes.

d) **Targeted Free School Meals** – children will be considered under these criteria if they are eligible for targeted free school meals on the closing date for applications or on the date the application is submitted if it is late or outside the main admission round. The city average will be taken as the average percentage of children eligible for targeted free school meals for the applying cohort (this will be Y6 pupils for the main admissions round) taken from the October school census in the application year. The number of places available at each school under criterion 4 will be calculated by applying the city average to the school's PAN and subtracting the number of places offered to pupils eligible for targeted free school meals under criteria 1,2 and 3. The number of places available under criterion 5 will be calculated by applying the city average to the schools PAN and subtracting the number of places offered to pupils eligible for targeted free school meals under criteria 1,2,3 and 4.

e) **Linked infant/Junior Schools -** Children who are attending or have been offered a place at an infant school in the list below will have priority for places at the linked junior school providing the allocation took place by 8 March in the admission year.

Downs Infant - Downs Junior
Patcham Infant - Patcham Junior
West Hove Infant Portland Road – Hove Junior Portland Road
West Hove Infant Holland Road - Hove Junior Holland Road

There is no link between West Hove Infant Holland Road and Hove Junior Portland Road, or between West Hove Infant Portland Road and Hove Junior Holland Road.

f) **Random allocation –** Where the random allocation tiebreak is used, every preference is assigned a unique random number by computer. The computer will then list the pupils using this random number. This computer allocation process is audited and overseen by a senior council officer not part of the school admissions team.

g) **Pupils living in single school catchment areas –** places will be offered up to 5% of a school's PAN to pupils living in a single school catchment area i.e. BACA, PACA, Patcham or Longhill. This criterion will not be applied to a preference for Patcham where the home address is in the Patcham catchment area or Longhill where the home address is in the Longhill catchment area.

h) **Catchment area postcode lists:**

Portslade Aldridge Community Academy (PACA):

BN41 2	BN41 1A
BN41 1DY	BN41 1D except Y
BN41 1FX	BN41 1E
BN41 1GR, S, T & U	BN41 1G except R, S, T & U
BN41 1LD, E, F, G & H	BN41 1H
BN41 1N	BN41 1L except D, E,
BN41 1PS	F, G, H
BN41 1RX	BN41 1OH
BN41 1S	BN41 1PB
BN41 1T	Part of BN41 1PH
BN41 1UA, B, Q	BN41 1UY
BN41 1WY	BN41 1WA, B, E & R
BN41 1X	
BN41 1Y	

Brighton Aldridge Community Academy (BACA):

BN2 4	BN1 9P
BN1 9HW	BN1 9Q except B
BN1 9HX	BN1 9R
BN1 9HY	BN1 9S
	BN1 9B except
BN1 9J except S	A,W,X & Z

Blatchington Mill School / Hove Park School:

BN3
BN1 2
BN1 3*
*Except BN1 3TG (Westcombe)
BN1 3TL (Prestonville Road
north of the railway line - Nos 1-28)
BN1 3TS (York Villas)
BN1 3TT (York Grove)
BN1 3TU (New England Road)
BN1 3TF/3TX (Belmont)
BN1 3TH (Russell Crescent)
BN1 3UG (Prestonville Court)
These are in the DS/Varndean catchment area

Patcham High School:

BN1 5AZ	BN1 9B,X,Y,Z
BN1 5E,F,G,H	BN1 9D
BN1 5JD (even numbers only),	BN1 9E
BN! 5JE (even numbers only)	BN1 5BQ
BN1 5JH, JJ, JP, JX	BN1 9G
BN1 5L except A, B, D, E,	BN1 9HT
R, S, W	BN1 9HU
BN1 8	BN1 9JS
BN1 9A	BN1 9QB
BN1 9BA	BN1 9TN

Tongdean Lane
Addresses in BN1 5JD and BN1 5JE (Tongdean Lane) cross the boundary between the catchment area for Dorothy Stringer / Varndean and the area for Patcham High: Odd numbers are in the area for Dorothy Stringer / Varndean. Even numbers are in the area for Patcham High.

The part of Tongdean Lane which is east of the railway line (ie Windsor Court BN1 5JS and Manhattan Court BN1 6XZ) is in the catchment area for Dorothy Stringer / Varndean.

Dorothy Stringer School / Varndean School:

BN1 1	BN1 6
BN1 3TG (Westcombe)	BN1 7
BN1 3TL (Prestonville Road north of the railway line - Nos 1-28)	BN2 0 except Y
BN1 3TS (York Villas)	BN2 3
BN1 3TT (York Grove)	BN2 5DT & some of Z**
BN1 3TU (New England Rd)	BN2 5ET & some of F, H & L**
BN1 3TF / X (Belmont)	BN2 5F except A, B & G**
BN1 3TH (Russell Crescent)	BN2 5G except G, H & J**
BN1 3UG (Prestonville Court)	BN2 5H except A**
BN1 4	BN2 5L except J**
BN1 5JS	BN2 5N except A, B & S**
BN1 5A except Z	BN2 5P except some of A & B**
BN1 5B, D, N, P, R, S, T	BN2 5Q**
BN1 5JB, JD (odd nos only),	BN2 5RS**
JE (odd nos only), JF, JG, JL, JN	BN2 5ZG & J**
BN1 5LA, B, D, E, R, S, W	BN2 9

Tongdean Lane
Addresses in BN1 5JD and BN1 5JE (Tongdean Lane) cross the boundary between the catchment area for Dorothy Stringer / Varndean and the area for Patcham High: Odd numbers are in the area for Dorothy Stringer / Varndean. Even numbers are in the area for Patcham High.

The part of Tongdean Lane which is east of the railway line (ie Windsor Court BN1 5JS and Manhattan Court BN1 6XZ) is in the catchment area for Dorothy Stringer / Varndean.

Addresses in BN2 5DZ, BN2 5EF, BN2 5EH, BN2 5EL and BN2 5PA cross the boundary between the catchment area for Longhill and the area for Varndean/Dorothy Stringer:
BN2 5DZ/BN2 5EF (Manor Way)- even numbers 2-34 are in the Varndean/DS area.
All odd numbers and evens from 36 onwards are in the Longhill area.
BN2 5EH/BN2 5EL (Manor Hill)- odd numbers are in the Longhill area. Even numbers are in the Dorothy Stringer / Varndean area.
BN2 5PA (odd numbers in Wilson Avenue)- 1, 3, 5, 7 & 11 are in the Longhill area. 13 upwards are in the Dorothy Stringer / Varndean area.

NB: addresses on the eastern side of Wilson Avenue (BN2 5PB) are all in the Longhill area.

Longhill High School:

BN2 0Y	BN2 5R except S**
BN2 1**	BN2 5S
BN2 5A**	BN2 5T

BN2 5B**	BN2 5U
BN2 5D except T & some of Z**	BN2 5W
BN2 5E except T & some of F, H & L**	BN2 5X
BN2 5FA, B & G**	BN2 5Y**
BN2 5GG, H & J**	BN2 5Z except G & J**
BN2 5HA**	BN2 6
BN2 5J**	BN2 7
BN2 5LJ**	BN2 8
BN2 5NA, B & S**	
Some of BN2 5PA & B**	

Addresses in BN2 5DZ, BN2 5EF, BN2 5EH, BN2 5EL and BN2 5PA cross the boundary between the catchment area for Longhill and the area for Varndean/Dorothy Stringer:

BN2 5DZ/BN2 5EF (Manor Way)- even numbers 2-34 are in the Varndean/DS area.
All odd numbers and evens from 36 onwards are in the Longhill area.
BN2 5EH/BN2 5EL (Manor Hill)- odd numbers are in the Longhill area. Even numbers are in the Dorothy Stringer / Varndean area.
BN2 5PA (odd numbers in Wilson Avenue)- 1, 3, 5, 7 & 11 are in the Longhill area. 13 upwards are in the Dorothy Stringer / Varndean area.

NB: addresses on the eastern side of Wilson Avenue (BN2 5PB) are all in the Longhill area.

**Addresses in these areas were in a different catchment areas for 2025-26.

BRIGHTON & HOVE CITY COUNCIL

Scheme for co-ordinated admissions to infant, primary and junior schools – Admissions Year 2028/29 (Admissions to Reception or year 3 of Junior School in September 2028)

Introduction

The main purpose of the co-ordinated scheme is to ensure that every parent of a child living in Brighton & Hove who has completed a school application receives one offer of an infant, primary or junior school place. This will be on a set date following the conclusion of the normal admission round for pupils seeking admission to school. The scheme is designed to foster clear communications on school admissions between the City Council, community schools, Academies (for the purposes of this document Free Schools are included as Academies), and voluntary aided schools which act as their own admission authority, and neighbouring Local Authorities (LAs) and admission authorities. It fulfils the requirements of the School Admissions (Admission Arrangements and Co-ordination of Admission Arrangements (England)) Regulations 2012 and more detailed arrangements set out in the School Admissions Code 2021.

The scheme does not affect the rights of voluntary aided schools and Academies to set their own admission priorities and consider applications on the basis of those priorities. It is intended to set out a process and time scale for the exchange of pupil information between the parties to the scheme, resulting in the offer of a single school place. This should represent a preference listed by the parent /carer following the application of the admission priorities by the Local Authority (LA) or by own admission authority schools. Where it is not possible to allocate a place at any of the preferred schools for a child living in Brighton & Hove, a place will be offered at the nearest school to their home address within the city boundaries with a place available. This will not preclude parents from seeking an alternative place elsewhere if they are unhappy with the offer, nor will it prevent them from lodging an appeal with the admission authority for their preferred school.

All residents of Brighton & Hove should apply using the City Council's common application form (online or paper) even if they are seeking a place at a maintained school in the area of another Council.

The time scales set out in the scheme will be broadly in line with the time scales used by neighbouring LAs. **Please be aware that governing bodies for VA schools and Academies will need to meet between 21 February 2028 and 10 March 2028 when the ranking order needs to be returned to the Local Authority.**

Key dates

- Online application facility available 1 September 2027
- Closing date for applications 15 January 2028
- Preference data exchanged with Voluntary 21 February 2028

aided schools and other LAs.

- Consider qualifying late applications. 08 March 2028
- Voluntary Aided schools provide Council with provisional ranking order of all applicants. 10 March 2028
- Finalise allocations and exchange offer details with neighbouring LAs Between 20-24 March 2028
- Offer details provided to schools 14 April 2028
- Notification e-mails sent to parents, decisions 17 April 2028
- posted to applicants without an email address
- Deadline date for acceptance of places 2 May 2028
- Deadline for acceptance of places and appeals to be heard in the main round. 16 May 2028

Process and detailed time scale – infant, junior and primary schools

1. The school admissions guidance published by the City Council is available online and will be distributed on request to parents/carers applying for infant or primary school places. A publicity campaign will be launched in November 2027 encouraging parents to apply online. Posters will be sent to schools, other council services, early years settings, the press and other media to remind parents of those pupils requiring a school place to apply.

2. Parents/carers will be invited to list 4 preferences for a school place ranked in order of priority. These may be at a city community school, an academy, a free school or a voluntary aided school, or any maintained school outside the City of Brighton & Hove. All residents in the city must use the Brighton & Hove school admission application to indicate their preferred schools, either the paper or online form. No other form of application will be valid. The LA allocates places on the basis of equal preferences, and each preference listed will be prioritised according to the published admission priorities for community and own admission authority schools. If it is possible to offer more than one place based on those priorities, the one ranked higher on the application will be offered.

3. Parents and carers are strongly advised to apply online through the facility available on the Brighton & Hove City Council website. This will provide them with a response which confirms their preference listing and acts as proof of application. Alternatively, the paper form should be completed and returned to their local infant/primary school or to the Admissions Team at Hove Town Hall, Hove **by 15 January 2028.**

4. Where, as part of its admission priorities a voluntary aided school requires additional supporting information, such as a Supplementary Information form, or proof of denominational commitment, that form or proof should be completed and returned to the school by the same closing date. This is to ensure that target dates for the exchange of pupil information and the notification date for parents/carers can be met.

5. Parents are encouraged to apply online however, if using an application form rather than the online application parents and carers are strongly

advised to return their application via a preferred school or email a scanned copy to the council's admission team. Parents who post the form should understand that proof of posting is not proof of receipt, and they will not have confirmation in the same way as those applying online or returning the form to a school. All maintained infant and primary schools in the city will return paper application forms to the LA as they are received, ideally scanned and sent by email. Schools should maintain a record of the date on which each form was received, and if required will provide proof of receipt to the parent/carer. This ensures that on time applications and late applications are clearly recorded as such. It also provides assurance for parents should the school or the LA subsequently mislay the form.

6. **No later than 21 February 2028**
   - ❖ LA will identify the numbers of preferences (first, second, third and fourth) received for each school.
   - ❖ Voluntary aided schools, free schools and academies will be provided with details of parental preferences where their school is given as a preference. They will apply oversubscription criteria to prioritise all preferences. Where pupils have an Education, Health & Care Plan (naming the school) and must be offered a place this will be indicated. These pupils must be given a place at the school in accordance with the SEN and Admissions Code. This applies to all maintained schools and academies.
   - ❖ West and East Sussex and other LA's as necessary will be forwarded the details of preferences expressed for their schools by Brighton & Hove parents/carers. Where the pupil has an Education, Health & Care Plan this will be indicated.
   - ❖ West and East Sussex will be asked to provide a list of pupils living in those areas who have expressed a preference for a Brighton & Hove school.

7. **No later than 10 March 2028**
   - ❖ Voluntary aided schools, free schools and academies will provide the LA with a list showing children in priority order for places at the school. The list will show which oversubscription criterion was applied to each child, and relevant information to apply any necessary tie-break. The school will advise the LA of such additional information as is necessary to inform parents of the reason for its decision when allocation letters and emails are sent on 17 April 2028.
   - ❖ Brighton & Hove will apply its admission priorities to all preferences received for community schools, and where the children are resident in other LAs, will inform that LA.
   - ❖ Consideration will be given to qualifying late applications received before 8 March 2028.

8. **Between 20 and 24 March 2028**
   - ❖ Brighton & Hove will establish whether more than one offer could be made on the basis of the application of its own admission priorities and

those of voluntary aided schools, free schools, academies and other LAs. It will determine in each case which is the highest parental ranking.

- ❖ Final lists of school allocations will be prepared.
- ❖ Emails to parents/carers will be prepared.
- ❖ Discussions will take place with other admission authorities as necessary to resolve any remaining unallocated applications.
- ❖ Neighbouring LAs will be sent final details of children living in their area offered a place at a Brighton & Hove school, and for whom they will need to send allocation letters.

9. 17 April 2028

Online applicants will receive their decisions by e-mail. Letters will be sent only to parents/carers who do not have an email address. The LA email or letter to parents will contain the following:

- ❖ If they have not been allocated a school of preference, the reason why not.
- ❖ How places at the preferred schools were allocated.
- ❖ Where it is an own admission authority school, the fact that the offer is made on behalf of the governing body or academy trust for the school.
- ❖ Where it is a school maintained by another LA, the fact that the offer is made on behalf of that LA.
- ❖ The right of appeal to an independent panel, and how to arrange an appeal for a community school or a voluntary aided school.
- ❖ Details about waiting lists for preferences that could not be met.

10. 2 May 2028

Parents and carers should accept offers of places by this date to allow schools and the LA ample planning time for the new intake. This does not affect their right to appeal if the place they are accepting is not their highest preference.

11. 16 May 2028

Parents should also have exercised their right to appeal by this date if they want to be assured of having their appeal heard in the main round of appeals.

12. Proof of address

The LA may require parents/carers to provide proof of address if they are applying for a community school place. Own admission authority schools may also request proof of address from their applicants.

Appendix A – Changes of address and late applications

New arrivals in the city

Parents/carers moving into the city in the course of the admission process who are making an application based on their new address must provide evidence of either a tenancy agreement of six months or more or evidence of

completion if they are purchasing a property. Applicants should where possible, submit their application by the closing date, especially if their move took place before the closing date. Proof of the move should then be provided at the earliest opportunity. If an application is made and evidence of the move provided by 8 March 2028, the application will be considered on-time and included in the main admission round.

Late applications received before 8 March 2027

I. With the exception of families moving and cases as described at V below, applications received after the closing date will not be considered by the LA until allocations have been made for those received before the closing date. Any received for an own admission authority school will be forwarded to the school which will decide whether there is a good reason to include these late applications in the main admission round.

II. Any applications received for community schools in respect of children in care will be included in the main admission round as valid preference at any time up to **25 March 2027**. Where such applications are received after that date, the LA will, if attendance at that school is seen as a necessity for the welfare of the child, seek to offer places at the school ranked highest on the application. If, however, it is acceptable to offer a place at a lower ranked school without going over numbers, the LA will discuss that possibility with the social worker for the child. Applications to voluntary aided schools, free schools and academies received on behalf of children in public care will be considered in line with the published admission policy for each school and the requirements of the School Admission Code.

III. Applications received after the closing date but before the 8 March 2028 will be sent a letter or email allocating a school place on 17 April 2028 or as soon as possible after that date if the volume of late applications is high.

IV. Parents/carers living in the city who change any preference because of a change of address, and who return the new application by **8 March 2028** will have that change considered in the main round of allocations. They will have to provide evidence of their new address. Those applications with evidence received after that date will be considered as late applications.

V. Other late applications where there is a good reason for the delay will be considered in the main round of allocations if received by **8 March 2027** where independent evidence is given by a third party (usually a professional source such as a doctor or social worker) to support the reason for the delay.

Late applications received after 8 March 2028

I. Applications received after 8 March 2028 will be sent an allocation letter or email as soon as possible after 16 May 2028.

II. Where an application is received after the allocation date, from a parent/carer living in the city, they must use the Brighton & Hove online application or paper form. If the preference(s) is for a community school, the LA will allocate a place if the school remains under subscribed. If the school(s) is fully subscribed, a place will be allocated at the nearest school to the home address that has a vacancy. Brighton & Hove will seek to make a decision as soon as possible after receiving the application. Where a preference is given for an own admission authority school or a school in a neighbouring LA, the application will be passed to that admission authority for a decision. They will be asked to reach a decision within fourteen days of receiving the application. Brighton & Hove will endeavour to send a decision to the parent /carer either as soon as possible once it has reached a decision or has been informed of a decision by the other admission authority.

III. If a change of preference is received following the decision letter on **17 April 2028** and the home address has not changed, that changed preference will not be considered until **mid-June 2028**. This allows reasonable time for the consideration of late first applications and the operation of the waiting list where places have been offered and refused.

IV. All applications received after 31 August 2028 will be regarded as outside this admission round and will be considered under the in-year coordinated scheme.

Waiting List

I. Brighton & Hove will operate a waiting list system for its community schools and for some academies. (Own admission authority schools usually make their own waiting list arrangements). The waiting list ranking will be based on the school's admission criteria. Rankings within each priority will be determined by home to school distance. Parents will need to request to be placed on the waiting list for community schools and they have the option to ask to go on the waiting list for any or all preference schools. Places will start to be offered from the waiting lists after 16 May 2028. Places will then be offered to children from the waiting list as soon as they become available at an oversubscribed school and the admission criteria have been applied.
II. Where a pupil is allocated a place from a waiting list the school place previously allocated will be withdrawn.
III. The waiting list will operate until the 31 December 2027.
IV. Parents/carers wishing to keep their child's name on the list for longer than the 31 December they must inform the LA. They must renew the waiting list place each term thereafter.

School Admission Appeals

I. Parents/carers wishing to appeal against the LA's decision not to offer a place at a preferred school should do so by **16 May 2028** if they want to be assured of having their appeal heard in the main appeal round.

II. The LA will not arrange an appeal or ask a voluntary aided school to arrange an appeal for a school that was not included on the original application. It will only arrange an appeal for a school which was listed as a preference. If a parent/carer wishes to receive a decision for a school not included in their original application, and thus acquire a right of appeal, they must complete a further application. However, unless there is a good reason for a change of preference this new application will not be considered until **mid-June 2028.**

III. Parents/carers will receive 10 school days' notice of the date of the appeal hearing and will receive copies of any documentation relating to the appeal 7 days in advance of the hearing.

IV. Appeals for on-time applications must be heard within 40 school days of the closing date for appeals to be lodged. The volume of appeals to be heard and the availability of the appeal panel members, who are volunteers, will have a direct effect on the timing of the appeal hearings.

V. Appeals for late applications and school transfers outside the normal admission round will be arranged as soon as practicable after the decision to refuse a preference has been conveyed to the pupil and the parent/carer, and in any case within 30 school days.

BRIGHTON & HOVE CITY COUNCIL

Scheme for co-ordinated admissions to secondary schools – Admissions Year 2028/29 (Admissions to year 7 in September 2028)

Introduction

The main purpose of the co-ordinated scheme is to ensure that every parent of a child living in Brighton & Hove who has completed a school application receives one offer of a secondary school place at the conclusion of the normal admission round for pupils transferring from primary to secondary school. The scheme is designed to foster clear communications on school admissions between the City Council, community schools, Academies (for the purposes of this document Free Schools are included as Academies), Cardinal Newman School, which as a voluntary aided secondary school acts as its own admission authority, and neighbouring Local Authorities (LAs) and admission authorities. It fulfils the requirements of the School Admissions (Admission Arrangements and Co-ordination of Admission Arrangements (England)) Regulations 2012 and more detailed arrangements set out in the School Admissions Code 2021.

The scheme does not affect the rights of the different admission authorities mentioned to set their own admission priorities and consider applications on the basis of those priorities. It is intended to set out a process and time scale for the exchange of pupil information between the parties to the scheme, resulting in the offer of a single school place. This should represent a preference listed by the parent/carer that it is possible to meet following the application of the admission priorities by this LA or by other admission authorities. Where it is not possible to allocate a place at any of the preferred schools for a child living in Brighton & Hove, a place will be offered at the nearest school to their home address within the city boundaries with a place available. This will not preclude parents from seeking an alternative place elsewhere if they are unhappy with the offer, nor will it prevent them from lodging an appeal with the admission authority for their preferred school.

All residents of Brighton & Hove should apply using the City Council's common application form (online or paper) even if they are seeking a place at a maintained school in another Council.

The time scales set out in the scheme work towards the prescribed date (1st March or the first working day following 1st March where it falls at a weekend) on which secondary school place decisions must be notified to parents/carers. It will also be broadly in line with the time scales used by neighbouring LAs.

Key dates

- Online application facility available — 1 September 2027
- Provide information for Junior & Primary schools to notify year 6 parents of the need to apply — by 17 September 2027
- Closing date for applications — 31 October 2027
- Preference data exchanged with own admission authority schools (Cardinal Newman, King's,

BACA & PACA) and neighbouring LAs 30 November 2027

- Own admission authority schools provide LA with provisional ranking order of applicants. 17 December 2027
- Consider qualifying late applications. 22 January 2028
- Finalise allocations and exchange offer details with neighbouring LAs 7 - 11 Feb 2028
- Offer details provided to schools 28 February 2028
- Notification e-mails sent to parents, decisions posted to applicants without an email address 1 March 2028
- Deadline date for acceptance of places 14 March 2028
- Deadline for appeals to be heard in the main round 29 March 2028

Process and detailed time scale

1. Information about the application process and how to apply will be distributed to parents via primary and junior schools at the beginning of September 2026.
2. Parents/carers will be invited to list 4 preferences for a school place ranked in order of priority. These may be at a city community school, an academy, a free school or a voluntary aided secondary school, or any maintained school outside the City of Brighton & Hove. All residents in the city must use the Brighton & Hove school admission application to indicate their preferred schools, either the paper or online form. No other form of application will be valid. The LA allocates places on the basis of equal preference, and each preference listed will be prioritised in accordance with the published admission priorities for community and own admission authority secondary schools in the city. If it is possible to offer more than one place based on those priorities, the one ranked higher on the application will be offered.

3. Parents and carers are strongly advised to apply online through the facility available on the Brighton & Hove City Council website. Alternatively, the paper form should be completed and returned to the child's primary or junior school in the city, or to the Admissions Team at Hove Town Hall **by 31 October 2027.** Applicants for Cardinal Newman and/or King's School will need to return their supporting information directly to the school as well as submitting an online application or paper form to the Council. If supporting information is returned to the Local Authority, the documents will be shared with these schools.

4. Where, as part of its admission priorities a voluntary aided school, free school or academy within the city or beyond requires additional supporting information, such as a Supplementary Information form, or proof of denominational commitment, that form or proof should be completed and returned to the school by the same closing date. This is to ensure that target dates for the exchange of pupil information between authorities and the notification date for parents/carers can be met.

5. Parents are encouraged to apply online. If using an application form rather than online application parents and carers whose children attend maintained primary schools in the city are strongly advised to return the form via the school or send scanned copies by email to the admissions team. Parents who prefer to post the

form should understand that proof of posting is not proof of receipt, and they will not have confirmation of receipt in the same way as those applying online or returning the form to their child's school. All maintained junior and primary schools in the city will return any secondary paper application forms they receive to the LA as they are received, ideally scanned and sent by email. Schools should maintain a list to record the date on which each form was received, the school preferences, and if required will provide proof of receipt to the parent/carer. This ensures that on time applications and late applications are clearly recorded as such. It also provides assurance for parents should the school or the LA subsequently mislay the form.

No later than 30 November 2027

- LA will identify the number of preferences (first, second, third or fourth) received for each school.
- Own admission authority schools will be provided with details of any parental preference where it gives the school as a preference (first, second, third or fourth) received by the LA. It will apply its oversubscription criteria to prioritise all preferences. Where pupils have an Education Health & Care Plan naming the school and must be offered a place this will be indicated. (These pupils must be given a place at the school in accordance with the SEN and Admissions Codes.)
- West and East Sussex and other LA's as necessary will be forwarded the details of preferences expressed for their schools by Brighton & Hove parents/carers. Where the pupil has an Education, Health & Care Plan this will be indicated.
- West and East Sussex will be asked to provide a list of pupils living in those areas who have expressed a preference for a Brighton & Hove school.

No later than 17 December 2027

- Own admission authority schools will provide the LA with a list showing children in priority order for places at the school. The list will show which admission criterion was applied to each child. The school will advise the LA of such additional information as is necessary to inform parents of the reason for its decision when allocation letters and emails are sent on 1 March 2028.
- Brighton & Hove will apply its admission priorities to all preferences received for community schools, and where the children are resident in other LAs, will inform that LA.

Between 7 and 11 February 2028

- Brighton & Hove will establish whether more than one offer could be made based on the council's admission priorities and those of voluntary aided schools, free schools/academies and other LAs. It will determine in each case which is the highest parental ranking.
- Final lists of school allocations will be prepared.
- Emails and letters to parents/carers will be prepared.
- Consideration will be given to late applications received before 22 January, as set out in Appendix A below.
- Neighbouring LAs will be sent final details of children living in their area offered a place at a Brighton & Hove school, and for whom they will need to send allocation letters.

1 March 2028
Online applicants will receive their decisions by e-mail. Letters will be sent only to parents/carers who do not have an email address. The LA email or letter to parents will contain the following:

- If they have not been allocated a school of preference, the reason why not.
- How places at all Brighton & Hove schools were allocated.
- Where it is an own admission authority school, the fact that the offer is made on behalf of the governing body or academy trust for the school.
- Where it is a school maintained by another LA, the fact that the offer is made on behalf of that LA.
- The right of appeal to an independent panel, and how to arrange an appeal for a community school, a voluntary aided school, and in the case of Academies, Free schools, and schools in other LA's who to contact.
- Details about waiting lists and reallocation pools for preferences that could not be met.

14 March 2028
Parents and carers should accept offers of places by this date to allow schools and the LA ample planning time for the new intake. This does not affect their right to appeal if the place they are accepting is not their highest preference.

29 March 2028
Parents should have exercised their right to appeal by this date if they want to be assured of having their appeal heard in the main round of appeals.

Proof of address
The LA may require parents/carers to provide proof of address if they apply for a place at a community school. Own admission authority schools may also request proof of address from their applicants.

Appendix A – Changes of address and late applications

New arrivals in the city
Parents/carers moving into the city in the course of the admission process who are making an application based on their new address must provide evidence of either a tenancy agreement of six months or more or evidence of completion if they are purchasing a property. Applicants should where possible, return their application by the closing date, especially if their move took place before the closing date. Proof of the move should then be provided at the earliest opportunity. If an application is made and evidence of the move provided by 22 January 2028, the application will be considered on-time and included in the main admission round.

Late applications received before the 22 January 2028.
I. With the exception of families moving and cases as described at V below, applications received after the closing date will not be considered by the LA until school allocations have been made for those received by the closing date. Any applications received for own admission authority schools will be

forwarded to the school, which will decide whether to include the application in the main admission round.

II. Any applications for community schools received in respect of children in care will be included in the main admission round as valid first preferences at any time up to the date of **11 February 2028**. Where such applications are received after that date, the LA will, if attendance at that school is seen as a necessity for the welfare of the child, seek to offer places at the school of first preference, if necessary, negotiating with that school to admit beyond the published admission number in order to do so. If, however, it is acceptable to offer a place at a lower ranked school without going over numbers, the LA will discuss that possibility with the social worker for the child. Applications for own admission authority schools and schools in other LA areas for children in care will be considered in line with the admission arrangements for those schools and the requirements of the Admissions Code.

III. Applications received after the closing date but before the 22 January 2028 will be sent a letter or email allocating a school place on 1 March 2028 or as soon as possible after that date if the volume of late applications is high.

IV. Parents/carers living in the city who change a preference because of a change of address within the city, and who submit the new application and evidence of the address change will have that change considered in the main round of allocations if it is received by **22 January 2028**. They will have to provide evidence of the address change. Those applications with evidence received after that date will be considered as late applications.

V. Other late applications where there is good reason for the delay will be considered in the main round of allocations if received by **22 January 2028** where independent evidence is given by a third party (usually a professional source such a doctor or social worker) to support the reason for the delay.

Late applications received after the 22 January 2028.

I. Applications received after 22 January 2028 will be sent a letter or email allocating a school place as soon as possible after 30 April 2028.

II. Where an application is received after 22 January 2028, from a parent/carer living in the city, they must use the Brighton & Hove online application service or paper application form. If the preference(s) is for a community school, the LA will allocate a place if the school remains under subscribed. If the school(s) is fully subscribed, a place will be allocated at the nearest school to the home address that has a vacancy. Brighton & Hove will seek to make a decision as soon as possible after receiving the application. Where a preference is given for a free school, an academy, a voluntary aided school or a school in a neighbouring LA, the application will be passed to that admission authority for a decision. They will be asked to reach a decision within fourteen days of receiving the application. Brighton & Hove will endeavour to send a decision to the parent /carer as soon as possible once it has either reached a decision or been informed of a decision by the other admission authority.

III. If a change of preference or preference order is received following the decision letter on 1 March 2028 and the home address has not changed (and there has been no other relevant change of circumstances), that changed preference will not be considered until mid-June 2028. This allows reasonable time for the consideration of late first applications and the

operation of the reallocation pool where places have been offered and refused.

IV. All applications received after 31 August 2028 will be regarded as in-year applications and outside this admission round.

Re-allocation Pool

I. Brighton & Hove will operate a re-allocation pool system for its community schools. The ranking of re-allocation pools will be based on the Brighton & Hove admission criteria. Parents/carers will be asked to indicate if they also wish to be placed in the re-allocation pool for a preferred school when the allocation emails and letters are sent on 1 March 2028. Places will be offered to children from the pool as soon as a place becomes available at an oversubscribed school and the admission priorities have been applied. When a place is been offered from a reallocation pool any previous school offers will be withdrawn.

II. This LA will notify other LAs as appropriate if it offers a place from the pool at a Brighton & Hove school to a pupil living outside the city.

III. The reallocation pool will operate until the 31 December 2028.

IV. Own admission authority schools (BACA, PACA, Cardinal Newman and Kings) and schools in other local authorities will operate their own waiting list/reallocation arrangements. If they can place a child resident in Brighton & Hove in one of their schools, they are asked to notify this LA at the earliest opportunity.

V. Parents/carers wishing to keep their child's name in the reallocation pool for a community school beyond the 31 December must inform the LA. They must renew the position on the reallocation pool at the end of each term thereafter.

School Admission Appeals

I. Parents/carers wishing to appeal against the LA's or a voluntary aided school's decision not to offer a place at a preferred school should do so in writing or using the online appeal facility by 29 March 2028 if they want to be assured of having their appeal heard in the main appeal round.

II. The LA will not arrange an appeal or ask an own admission authority school to arrange an appeal for a school that was not included on the original application. If a parent/carer wishes to receive a decision for a school not included in their original preferences, and thus acquire a right of appeal, they must complete a further application. However, unless there is a change of address or other change of circumstances leading to the change of preference this new application will not be considered until mid-June 2028.

III. Parents/carers will receive 10 school days' notice of the date of the appeal hearing and will receive copies of any documentation relating to the appeal 7 days in advance of the hearing.

IV. Whilst the City Council, other LAs and the Admission Authorities of Academies and voluntary aided schools will make every effort to hear appeals within 40 school days of the deadline for submitting appeals, as suggested in the Appeals Code, they cannot guarantee this time scale. The volume of appeals to be heard and the availability of the appeal panel members, who are volunteers, will have a direct effect on the timing of the appeal hearings.

V. Appeals for late applications and school transfers outside the normal admission round will be arranged as soon as practicable after the decision to refuse a preference has been conveyed to the parent/carer or if appropriate to the student, and in any case within 30 school days of the appeal being lodged.

Date of Birth / school year	School yr in Sept 2026	Grand Total all planning areas from 2025 data	pupils likely to want a school place based on 90% of GP reg data	Permanent places in Year R in 2026	Surplus places or shortfall of places	Comparison with 2024 data	
All planning Areas						Surplus places or shortfall of places	Number of surplus places have risen
places in each school year from Sept 2026							
places in each school year from Sept 2027							
01 September 15 to 31 August 16	6	2,893	2,604				
01 September 16 to 31 August 17	5	2,741	2,467				
01 September 17 to 31 August 18	4	2,623	2,361				
01 September 18 to 31 August 19	3	2,472	2,225				
01 September 19 to 31 August 20	2	2,409	2,168				
01 September 20 to 31 August 21	1	2,246	2,021	2,550			
01 September 21 to 31 August 22	**R**	2,194	1,975	2,415	440	467	-26
01 September 22 to 31 August 23	**2027**	1,974	1,777	2,430	653	623	31
01 September 23 to 31 August 24	**2028**	2,080	1,872	2,430	558	558	0
01 September 24 to 31 August 25	**2029**	2,054	1,849	2,430	581		

Date of Birth / school year	School yr in Sept 2026	Portslade	Central Hove	West Blatchington and North Hangleton	Central City	Patcham	City East	The Deans	City North	TOTALS
All planning Areas		**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	
places in each school year from Sept 2026		**240**	**630**	**90**	**450**	**150**	**450**	**225**	**180**	**2415**
places in each school year from Sept 2027		**240**	**660**	**90**	**450**	**150**	**450**	**210**	**180**	**2430**
01 September 15 to 31 August 16	6	212	699	112	526	182	425	229	221	2604
01 September 16 to 31 August 17	5	225	636	95	459	162	458	221	211	2467
01 September 17 to 31 August 18	4	221	663	93	455	163	392	192	182	2361
01 September 18 to 31 August 19	3	216	572	103	433	136	394	191	180	2225
01 September 19 to 31 August 20	2	185	573	82	420	143	419	163	183	2168
01 September 20 to 31 August 21	1	185	544	72	416	122	362	150	171	2021
01 September 21 to 31 August 22	**R**	177	541	76	354	135	357	173	162	1975
01 September 22 to 31 August 23	**2027**	158	496	66	354	95	346	129	135	1777
01 September 23 to 31 August 24	**2028**	170	495	58	372	124	386	120	148	1872
01 September 24 to 31 August 25	**2029**	158	536	66	352	92	360	128	157	1849

Percentage of Surplus places

Date of Birth / school year	School year in Sept 2026	Portslade	Central Hove	West Blatchington and North Hangleton	Central City	Patcham	City East	The Deans	City North	TOTALS
All planning Areas		**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	
01 September 14 to 31 August 15	6									
01 September 15 to 31 August 16	5									
01 September 16 to 31 August 17	4									
01 September 17 to 31 August 18	3									
01 September 18 to 31 August 19	2									
01 September 19 to 31 August 20	1									
01 September 20 to 31 August 21	**R**	26%	14%	16%	21%	10%	21%	23%	10%	18%
01 September 21 to 31 August 22	**2027**	34%	25%	27%	21%	37%	23%	39%	25%	27%
01 September 22 to 31 August 23	**2028**	29%	25%	36%	17%	17%	14%	43%	18%	23%
01 September 23 to 31 August 24	**2029**	34%	19%	27%	22%	39%	20%	39%	13%	24%

Date of Birth / school year	School year in Sept 2026	BN41 1	BN41 2				Comparison with 2024 data	
1 Portslade		Benfield Primary St Marys Primary	Brackenbury Primary St Nicolas Primary Mile Oak Primary Peter Gladwin Pri	TOTALS	pupils likely to want a school place based on 90% of GP reg data	Surplus places or shortfall of places	Surplus places or shortfall of places based on 2024 data	Number of surplus places have risen fallen between 2024 and 2025
places in each school year from Sept 2026		**60**	**180**	**240**				
places in each school year from Sept 2027		**60**	**180**	**240**				
01 September 15 to 31 August 16	6	63	172	235	212			
01 September 16 to 31 August 17	5	75	175	250	225			
01 September 17 to 31 August 18	4	77	168	245	221			
01 September 18 to 31 August 19	3	67	173	240	216			
01 September 19 to 31 August 20	2	61	145	206	185			
01 September 20 to 31 August 21	1	67	139	206	185			
01 September 21 to 31 August 22	**R**	57	140	197	177	63	65	-2
01 September 22 to 31 August 23	**2027**	52	123	175	158	83	74	9
01 September 23 to 31 August 24	**2028**	48	141	189	170	70	75	-5
01 September 24 to 31 August 25	**2029**	55	121	176	158	82		

Date of Birth / school year	School year in Sept 2026	BN3 1	BN3 2	BN3 3	BN3 4	BN3 5	BN3 6	BN3 7				Comparison with 2024 data	
2 Central Hove		West Hove Infant @Holland Road Hove Juniors Holland Road Brunswick Primary		St Andrews Primary		West Hove Infant Hove Junior	Cottesmore Primary Bilingual Primary School	Aldrington Primay Goldstone Primary	TOTALS	pupils likely to want a school place based on 90% of GP reg data	Surplus places or shortfall of places	Surplus places or shortfall of places based on 2024 data	Number of surplus places have risen fallen between 2024 and 2025
places in each school year from Sept 2026		**120**		**90**		**120**	**150**	**150**	**630**				
places in each school year from Sept 2027		**150**		**90**		**120**	**150**	**150**	**660**				
01 September 15 to 31 August 16	6	99	40	96	70	165	150	157	777	699			
01 September 16 to 31 August 17	5	71	41	125	92	113	118	147	707	636			
01 September 17 to 31 August 18	4	100	39	107	62	151	137	141	737	663			
01 September 18 to 31 August 19	3	78	40	99	66	117	136	100	636	572			
01 September 19 to 31 August 20	2	81	35	92	72	132	97	128	637	573			
01 September 20 to 31 August 21	1	78	33	86	55	121	116	115	604	544			
01 September 21 to 31 August 22	**R**	67	38	114	67	127	94	94	601	541	89	125	-35
01 September 22 to 31 August 23	**2027**	60	46	95	53	117	79	101	551	496	164	176	-12
01 September 23 to 31 August 24	**2028**	66	53	94	51	116	74	96	550	495	165	154	11
01 September 24 to 31 August 25	**2029**	103	55	114	53	118	57	96	596	536	124		

Date of Birth / school year	School year in Sept 2026	BN3 8				Comparison with 2024 data	
3 West Blatchington and North Hangleton		Hangleton Primary West Blatch Prim	TOTALS	pupils likely to want a school place based on 90% of GP reg data	Surplus places or shortfall of places	Surplus places or shortfall of places based on 2024 data	Number of surplus places have risen fallen between 2024 and 2025
places in each school year from Sept 2026		**90**	**90**				
places in each school year from Sept 2027		**90**	**90**				
01 September 15 to 31 August 16	6	124	124	112			
01 September 16 to 31 August 17	5	105	105	95			
01 September 17 to 31 August 18	4	103	103	93			
01 September 18 to 31 August 19	3	114	114	103			
01 September 19 to 31 August 20	2	91	91	82			
01 September 20 to 31 August 21	1	80	80	72			
01 September 21 to 31 August 22	**R**	84	84	76	14	18	-4
01 September 22 to 31 August 23	**2027**	73	73	66	24	31	-7
01 September 23 to 31 August 24	**2028**	64	64	58	32	31	1
01 September 24 to 31 August 25	**2029**	73	73	66	24		

Date of Birth / school year	School year in Sept 2026	BN1 2	BN1 3	BN1 5	BN1 1	BN1 4	BN1 6	BN1 7				Comparison with 2024 data	
4 Central City			St Mary Mags Prim St Pauls Primary	Stanford Infant Stanford Junior Westdene Primary	Middle Street Primary		Downs Infant Downs Junior Balfour Primary St Bernadettes Pri	Hertford Infant Hertford Junior ~~St Josephs Primary~~	TOTALS	pupils likely to want a school place based on 90% of GP reg data	Surplus places or shortfall of places	Surplus places or shortfall of places based on 2024 data	Number of surplus places have risen fallen between 2024 and 2025
places in each school year from Sept 2026			**60**	**120**	**30**		**210**	**30**	**450**				
places in each school year from Sept 2027			**60**	**120**	**30**		**210**	**30**	**450**				
01 September 15 to 31 August 16	6	28	71	116	13	61	184	111	584	526			
01 September 16 to 31 August 17	5	29	45	108	11	54	173	90	510	459			
01 September 17 to 31 August 18	4	24	76	98	7	40	172	89	506	455			
01 September 18 to 31 August 19	3	20	56	99	6	54	171	75	481	433			
01 September 19 to 31 August 20	2	25	58	96	8	43	147	90	467	420			
01 September 20 to 31 August 21	1	18	57	103	7	43	140	94	462	416			
01 September 21 to 31 August 22	**R**	24	51	76	≤5	26	148	68	393	354	96	77	19
01 September 22 to 31 August 23	**2027**	17	48	86	≤5	43	119	80	393	354	96	69	27
01 September 23 to 31 August 24	**2028**	25	58	67	9	42	146	66	413	372	78	56	22
01 September 24 to 31 August 25	**2029**	19	65	83	9	54	100	61	391	352	98		

Date of Birth / school year	School year in Sept 2026	BN1 8				Comparison with 2024 data	
5 Patcham		Patcham Infant Patcham Junior Carden Primary	TOTALS	pupils likely to want a school place based on 90% of GP reg data	Surplus places or shortfall of places	Surplus places or shortfall of places based on 2024 data	Number of surplus places have risen fallen between 2024 and 2025
places in each school year from Sept 2026		**150**	**150**				
places in each school year from Sept 2027		**150**	**150**				
01 September 15 to 31 August 16	6	202	202	182	-32		
01 September 16 to 31 August 17	5	180	180	162	-12		
01 September 17 to 31 August 18	4	181	181	163	-13		
01 September 18 to 31 August 19	3	151	151	136	14		
01 September 19 to 31 August 20	2	159	159	143	7		
01 September 20 to 31 August 21	1	135	135	122	29		
01 September 21 to 31 August 22	**R**	150	150	135	15	22	-7
01 September 22 to 31 August 23	**2027**	105	105	95	56	58	-3
01 September 23 to 31 August 24	**2028**	138	138	124	26	31	-5
01 September 24 to 31 August 25	**2029**	102	102	92	58		

Date of Birth / school year	School year in Sept 2026	BN2 0	BN2 1	BN2 2	BN2 3	BN2 5	BN2 9				Comparison with 2024 data	
6 City East		Queens Park Pri St John the Baptist Primary			Elm Grove Primary Fairlight Primary St Martins Primary	St Marks Primary City Academy Whitehawk	Carlton Hill Primary St Lukes Primary	TOTALS	pupils likely to want a school place based on 90% of GP reg data	Surplus places or shortfall of places	Surplus places or shortfall of places based on 2024 data	Number of surplus places have risen fallen between 2024 and 2025
places in each school year from Sept 2026		**90**			**150**	**90**	**120**	**450**				
places in each school year from Sept 2027		**90**			**150**	**90**	**120**	**450**				
01 September 15 to 31 August 16	6	60	52	≤5	96	131	133	472	425			
01 September 16 to 31 August 17	5	58	65	≤5	98	155	133	509	458			
01 September 17 to 31 August 18	4	49	44	≤5	75	145	123	436	392			
01 September 18 to 31 August 19	3	39	49	≤5	97	123	130	438	394			
01 September 19 to 31 August 20	2	51	52	≤5	85	149	128	465	419			
01 September 20 to 31 August 21	1	45	38	≤5	84	109	126	402	362			
01 September 21 to 31 August 22	**R**	43	48	≤5	82	117	107	397	357	93	74	19
01 September 22 to 31 August 23	**2027**	34	56	≤5	69	124	101	384	346	104	88	16
01 September 23 to 31 August 24	**2028**	50	54	≤5	95	115	115	429	386	64	68	-4
01 September 24 to 31 August 25	**2029**	35	58	≤5	98	106	103	400	360	90		

Date of Birth / school year	School year in Sept 2026	BN2 6	BN2 7	BN2 8				Comparison with 2024 data	
7 The Deans		Rudyard Kipling Pri Woodingdean Prim	Our Lady of Lourdes Pri St Margarets Pri	Saltdean Primary	TOTALS	pupils likely to want a school place based on 90% of GP reg data	Surplus places or shortfall of places	Surplus places or shortfall of places based on 2024 data	Number of surplus places have risen fallen between 2024 and 2025
places in each school year from Sept 2026		**105**	**60**	**60**	**225**				
places in each school year from Sept 2027		**90**	**60**	**60**	**210**				
01 September 15 to 31 August 16	6	117	37	100	254	229			
01 September 16 to 31 August 17	5	129	32	85	246	221			
01 September 17 to 31 August 18	4	109	30	74	213	192			
01 September 18 to 31 August 19	3	102	33	77	212	191			
01 September 19 to 31 August 20	2	94	19	68	181	163			
01 September 20 to 31 August 21	1	89	22	56	167	150			
01 September 21 to 31 August 22	**R**	96	29	67	192	173	52	60	-8
01 September 22 to 31 August 23	**2027**	72	18	53	143	129	81	95	-14
01 September 23 to 31 August 24	**2028**	61	18	54	133	120	90	108	-18
01 September 24 to 31 August 25	**2029**	74	16	52	142	128	82		

Date of Birth / school year	School year in Sept 2026	BN1 9	BN2 4				Comparison with 2024 data	
8 City North		Coldean Primary	Bevendean Primary Coombe Rd Primary Moulsecoomb Prim	TOTALS	pupils likely to want a school place based on 90% of GP reg data	Surplus places or shortfall of places	Surplus places or shortfall of places based on 2024 data	Number of surplus places have risen fallen between 2024 and 2025
places in each school year from Sept 2026		**60**	**120**	**180**				
places in each school year from Sept 2027		**60**	**120**	**180**				
01 September 15 to 31 August 16	6	60	185	245	221			
01 September 16 to 31 August 17	5	63	171	234	211			
01 September 17 to 31 August 18	4	66	136	202	182			
01 September 18 to 31 August 19	3	60	140	200	180			
01 September 19 to 31 August 20	2	53	150	203	183			
01 September 20 to 31 August 21	1	48	142	190	171			
01 September 21 to 31 August 22	**R**	44	136	180	162	18	27	-9
01 September 22 to 31 August 23	**2027**	35	115	150	135	45	32	13
01 September 23 to 31 August 24	**2028**	44	120	164	148	32	35	-3
01 September 24 to 31 August 25	**2029**	48	126	174	157	23		

Data from Oct 25 school census

Year of secondary entry		school Census by year in Oct 25							Estimated number going to CNCS	Estimated number going to King's	Average
		R	1	2	3	4	5	6			
		2032	2031	2030	2029	2028	2027	2026			
	places available										
PACA catchment	**220**	216	190	256	222	238	221	262			
reduced by 2.46%		211	185	250	217	232	216	256			
adjusted for CNCS & Kings		**173**	**147**	**212**	**179**	**194**	**178**	**218**	25	13	
Surplus/Shortfall of places		**47**	**73**	**8**	**41**	**26**	**42**	**2**			
Number of FSM eligible pupils		45	40	65	66	74	64	80			
% of pupils in catchment area eligible for FSM		**21%**	**21%**	**25%**	**30%**	**31%**	**29%**	**31%**			26%
Hove Park & Blatchingrton Mill catchment area	**510**	622	687	664	726	705	756	741			
reduced by 5.13%		590	652	630	689	669	717	703			
adjusted for CNCS & Kings		**311**	**373**	**351**	**410**	**390**	**438**	**424**	138	141	
Surplus/Shortfall of places		**199**	**137**	**159**	**100**	**120**	**72**	**86**			
Number of FSM eligible pupils		64	114	110	172	155	178	171			
% of pupils in catchment area eligible for FSM		**10%**	**17%**	**17%**	**24%**	**22%**	**24%**	**23%**			19%
Stringer & Varndean catchment area	**630**	595	628	645	631	665	692	705			
reduced by 4.58%		568	599	615	602	635	660	673			
adjusted for CNCS & Kings		**496**	**527**	**543**	**530**	**563**	**588**	**601**	64	8	
Surplus/Shortfall of places		**134**	**103**	**87**	**100**	**67**	**42**	**29**			
Number of FSM eligible pupils		96	156	194	188	205	219	209			
% of pupils in catchment area eligible for FSM		**16%**	**25%**	**30%**	**30%**	**31%**	**32%**	**30%**			27%
Longhill catchment area	**210**	219	282	258	280	298	283	301			
reduced by 23.89%		167	215	196	213	227	215	229	64	3	
adjusted for CNCS & Kings		**100**	**148**	**129**	**146**	**160**	**148**	**162**			
Surplus/Shortfall of places		**110**	**62**	**81**	**64**	**50**	**62**	**48**			
Number of FSM eligible pupils		44	58	61	82	99	92	103			
% of pupils in catchment area eligible for FSM		**20%**	**21%**	**24%**	**29%**	**33%**	**33%**	**34%**			28%
BACA catchment area	**180**	141	160	135	151	179	175	168	27	2	
reduced by 6.52%		132	150	126	141	167	164	157			
adjusted for CNCS & Kings		**103**	**121**	**97**	**112**	**138**	**135**	**128**			
Surplus/Shortfall of places		**77**	**59**	**83**	**68**	**42**	**45**	**52**			
Number of FSM eligible pupils		35	73	58	82	96	104	92			
% of pupils in catchment area eligible for FSM		**25%**	**46%**	**43%**	**54%**	**54%**	**59%**	**55%**			48%
Patcham catchment area	**225**	208	219	214	232	247	251	241			
reduced by 3.03%		202	212	208	225	240	243	234	37	3	
adjusted for CNCS & Kings		**162**	**172**	**168**	**185**	**200**	**203**	**194**			
Surplus/Shortfall of places		**63**	**53**	**57**	**40**	**25**	**22**	**31**			
Number of FSM eligible pupils		21	33	23	52	56	42	54			
% of pupils in catchment area eligible for FSM		**10%**	**15%**	**11%**	**22%**	**23%**	**17%**	**22%**			17%
Total for catchment area Schools	**1975**	1344	1488	1500	1562	1644	1690	1726			
Total for all Schools	**2500**	1869	2013	2025	2087	2169	2215	2251			
Number of surplus places		**631**	**487**	**475**	**413**	**331**	**285**	**249**			
% of surplus places		**25%**	**19%**	**19%**	**17%**	**13%**	**11%**	**10%**			

Brighton & Hove City Council

Cabinet

Agenda Item 91

Subject: **Homes for everyone: homelessness and rough sleeping local delivery plan**

Date of meeting: **12 November 2026**

Report of: **Cabinet Member for Housing**

Lead Officer: **Name: Corporate Director for Homes & Adult Social Care**

Contact Officer: **Name: Lisa Ellwood, Elizabeth Leach, Lucie Spicer, Harry Williams**

Email: [lisa.ellwood@brighton-hove.gov.uk]

Ward(s) affected: (All Wards);

Key Decision: Yes

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

1. Purpose of the report and policy context

1.1 The council's Homelessness and Rough Sleeping Strategy 2025–2030 was approved by Cabinet in December 2025. Developed with partners and people with lived experience, it focuses on preventing homelessness and rough sleeping, improving temporary accommodation, strengthening support for people with complex needs, and improving outcomes for children, families and young people.

1.2 The Strategy supports the Council Plan outcomes of a fair and inclusive city and homes for everyone. It also provides the local framework for responding to the Government's national homelessness strategy.

1.3 The national strategy requires local authorities to publish an action plan by 1 December 2026 as a condition of grant funding and to keep it under review. Ministry of Housing, Communities and Local Government guidance requires the plan to include:

a) targets to improve performance;
b) local governance arrangements;
c) how local partnerships will support delivery;
d) a long-term rough sleeping partnership plan; and
e) a policy for ensuring the suitability of temporary accommodation.

1.4 This report asks Cabinet to approve and publish the Homelessness and Rough Sleeping Action Plan, the Long-Term Rough Sleeping Partnership Plan and the Suitability of Temporary Accommodation Policy, attached as Appendices 1 to 3. Together, they set the framework for delivery,

performance and partnership accountability and meet the relevant grant conditions.

2. Recommendations

2.1 Cabinet agrees to adopt and publish:

- the Homelessness and Rough Sleeping Action Plans (Appendix 1)
- the Policy for Ensuring the Suitability of Temporary Accommodation (Appendix 2)
- the Long-Term Rough Sleeping Partnership Plan (Appendix 3)

2.2 Cabinet delegates to the Corporate Director, Homes and Adult Social Care, in consultation with the Cabinet Member for Housing, the authority to review and amend actions and targets contained within the Homelessness and Rough Sleeping Action Plans and Long-Term Rough Sleeping Partnership Plan for the duration of the Action Plans.

3. Context and background information

3.1 The Homelessness and Rough Sleeping Strategy 2025-2030 remains the city's overarching strategic document for addressing homelessness and rough sleeping across the city.

3.2 The governance framework uses existing council and partnership structures to support a streamlined and coordinated approach. It provides political oversight through the council's established decision-making arrangements and an annual report on progress.

3.3 It was created through co-production with partners and those with lived experience. Council officers led the development of the Strategy using the council's learning organisation framework by:

- being connected with residents with lived experience, and the knowledge and expertise of partners and frontline staff;
- being confident in the development of the Strategy and action plans by using data and resident intelligence; and
- a commitment to diversity and inclusion by ensuring the Strategy includes a chapter dedicated to children, families and young people and the acute inequalities they experience in temporary accommodation

3.4 It has three 'Priorities' and one overarching 'Chapter' which sits across all three priorities:

1. Increase our effectiveness in preventing homelessness and rough sleeping
2. Improve temporary accommodation pathways and experiences
3. Improve joined-up support with our partners for people who most need help

3.5 The Strategy includes a cross-cutting Chapter which commits to tackling homelessness in children, families and young people.

3.6 The partnership's implementation of the Strategy is beginning to change how and when residents receive help. More households are approaching the council before they become homeless, with the proportion seeking help at the prevention stage increasing from 38.7% in 2025/26 to 44.9% in the first quarter of 2026/27. Successful early intervention and prevention outcomes are forecast to increase from 554 households in 2025/26 to 662 in 2026/27.

3.7 The Strategy is also supporting a shift towards more stable and better-managed temporary accommodation. Although the overall number of households requiring temporary accommodation remains high, the proportion placed in nightly paid accommodation reduced from 26% in January 2026 to 16% in August 2026, with more households living in homes owned or controlled by the council.

3.8 The documents attached to this report in Appendix 1-3 sit alongside the strategy. These are as follows:

- The **Homelessness and Rough Sleeping Action Plan** includes targets and a description of how, working with partners, those targets will be achieved to support delivery of the strategy. They set out how partners are putting prevention at the heart of support and services.
- The **Long-Term Rough Sleeping Partnership Plan** supports delivery of the strategy's commitment to improve outcomes for people experiencing rough sleeping (with a focus on long-term rough sleeping) and strengthens coordinated support for residents with multiple and complex needs. It sets out partnership activity to reduce long-term rough sleeping and connects this to wider rough sleeping plans.
- The **Suitability of Temporary Accommodation Policy** supports delivery of the strategy's priority to improve temporary accommodation pathways and experiences by establishing a clear framework for ensuring suitability after assessment, including supply, procurement and allocation

3.9 Together, these documents ensure that the ambitions agreed within the strategy are translated into operational delivery, partnership accountability and measurable outcomes.

3.10 Brighton and Hove continues to experience significant housing and homelessness pressures as a city. Demand for homelessness services remains high, temporary accommodation use continues to place operational and financial pressures on the council, and some residents continue to experience multiple and complex barriers to securing and sustaining accommodation.

3.11 The council's review of homelessness identified 3,580 people experiencing homelessness in the city in June 2024, including 1,411 children. At the end of 2024, 1,928 households were living in temporary accommodation, while homelessness applications have continued to rise in recent years.

3.12 The strategy acknowledges that homelessness is rooted in wider structural and system-wide challenges and that lasting progress requires coordinated action across housing, health, social care, community safety, the voluntary sector and other partners.

3.13 The plans therefore provide a practical framework through which the council and its partners can deliver shared priorities, strengthen accountability and maintain a stronger focus on prevention and early intervention.

Homelessness and Rough Sleeping Action Plan

3.14 The Homelessness and Rough Sleeping Action Plan is the overarching delivery document for the city. Building on the priorities established within the Homelessness and Rough Sleeping Strategy 2025-2030, the Action Plan sets out the specific actions, milestones and performance measures that will support delivery over the coming years aligned with MHCLG guidance.

3.15 The plan brings together activity relating to homelessness prevention including hidden homelessness, housing options, temporary accommodation, rough sleeping services and wider support services into a single delivery framework. It establishes clear ownership of actions, supports partnership accountability and provides a mechanism for monitoring progress against agreed outcomes.

3.16 The Action Plan also identifies how partners across the homelessness and rough sleeping system will contribute to delivery and how progress will be reviewed and reported.

Long-Term Rough Sleeping Partnership Plan

3.17 The Long-Term Rough Sleeping Partnership Plan focuses on residents experiencing the most entrenched forms of rough sleeping and homelessness.

3.18 The Homelessness and Rough Sleeping Strategy recognises that people experiencing long-term rough sleeping often face multiple and interconnected challenges, including poor mental and physical health, substance use, experiences of trauma and wider social exclusion. Addressing these issues requires coordinated support across a number of organisations.

3.19 The plan sets out how housing services, health providers, community safety services, criminal justice partners, commissioned providers and voluntary sector organisations work together to reduce long term rough sleeping and improve longer term outcomes.

3.20 It establishes a shared understanding of priorities, responsibilities and partnership commitments and supports the council's wider ambition to prevent and reduce people experiencing rough sleeping – and long-term rough sleeping - across the city.

Suitability of Temporary Accommodation Policy

3.21 The Suitability of Temporary Accommodation Policy ensures suitability after assessment, including supply, procurement and allocation. It replaces the Allocation of Temporary Accommodation Policy.

3.22 Improving temporary accommodation pathways and experiences is one of the three priorities within the Homelessness and Rough Sleeping Strategy. The strategy recognises the need to improve the quality of accommodation, reduce lengths of stay and ensure households are supported to move on into settled housing as quickly as possible.

3.23 The policy supports these objectives by setting out how the council determines suitability when making placements. This includes consideration of household composition, medical needs, support requirements, affordability, accessibility and location. The policy also establishes a framework for reviewing placements where circumstances change and supports consistency, transparency and accountability in decision making.

3.24 The policy is also aligned with the emerging Brighton & Hove Temporary Accommodation Charter, developed through the Temporary Accommodation Action Group with Justlife, people with lived experience, accommodation providers and other partners.

3.25 The Charter aims to establish shared expectations for safe, suitable and well-managed temporary accommodation, including clear information for residents, respectful and trauma-informed services, effective safeguarding, access to support and consistent provider standards.

3.26 The council supports these principles and is working with partners to understand how they can be applied consistently and proportionately across different types of temporary accommodation.

3.27 This will include using the forthcoming procurement of block-booked temporary accommodation to set clear quality, service and contract-management expectations for providers, while continuing to drive standards through the management, inspection and improvement of accommodation owned or controlled by the council.

3.28 The Homelessness and Rough Sleeping Strategy recognises that homelessness cannot be addressed by a single service or organisation acting alone and highlights the importance of partnership working in delivering lasting change.

3.29 The plans have therefore been developed through engagement across the homelessness and rough sleeping system. Internally, engagement sessions and workshops have been undertaken with council services involved in homelessness prevention, rough sleeping, temporary accommodation, housing, commissioning, adult social care, children’s services, public health and related service areas.

3.30 Alongside this, the council has engaged with partners across the homelessness and rough sleeping system, including health organisations, commissioned providers, voluntary and community sector organisations and other statutory partners. This has included workshops and learning sessions with frontline workers, people with lived and living experience, and partners within the Homelessness and Rough Sleeping Working Group.

3.31 This engagement has shaped the priorities, actions and governance arrangements in the plans and supports a shared, whole-system approach, including lived and living experience, to preventing homelessness, reducing rough sleeping and improving outcomes for residents.

Connection to the new Rough Sleeping Programme

3.32 The Government's new Rough Sleeping Programme aims to ensure that everyone experiencing rough sleeping receives a meaningful offer of accommodation and/or support by Christmas, with more intensive support for people experiencing longer-term rough sleeping.

3.33 The council supports the programme, which builds on the city's existing rough sleeping services and complements the plans and policies set out in this report.

3.34 A further report setting out the city's response to the Rough Sleeping Programme will be presented to Cabinet in December 2026.

Governance and accountability

3.35 Strong governance is integral to delivery of the Strategy and supporting plans. The framework uses existing council and partnership structures to support a streamlined and coordinated approach.

3.36 Cabinet will provide political oversight through the council's established decision-making arrangements and receive an annual report on progress.

3.37 The People Overview and Scrutiny Committee will receive annual updates on delivery of the Strategy through the supporting plans.

3.38 The Homelessness and Rough Sleeping Partnership Board meets quarterly and provides strategic oversight across the homelessness and rough sleeping system. It brings together partners from housing, health, community safety, commissioned services, the voluntary and community sector and people with lived experience to monitor agreed priorities and actions.

3.39 The Homelessness and Rough Sleeping Working Group meets at least monthly, and every two weeks where required. It coordinates delivery across the three priorities and cross-cutting chapter of the Strategy.

3.40 The Working Group brings together council teams and partners from housing, health, community safety, commissioned services and the

voluntary and community sector, including representatives of people with lived experience, to oversee progress against agreed actions and timescales.

3.41 Related programmes and service developments will be coordinated through the Working Group so that they contribute to the Strategy and supporting plans.

3.42 The Health and Wellbeing Board provides strategic oversight where homelessness intersects with health inequalities, prevention, mental health, public health and the wider determinants of health.

3.43 The Adult Safeguarding Board provides oversight and challenge on safeguarding responsibilities and coordinated support for adults experiencing homelessness who may have care and support needs.

3.44 Operational delivery will continue through existing service, commissioning and partnership arrangements, with actions reflected in service plans and partnership work programmes where appropriate.

3.45 Subject to Cabinet approval, the plans will guide delivery across the city and provide the basis for performance monitoring, partnership accountability and reporting.

4. Analysis and consideration of alternative options

4.1 The alternative option of taking no action and continuing to rely solely on the Homelessness and Rough Sleeping Strategy 2025–2030 was considered. This is not recommended because the Strategy is the overarching strategic document and does not, on its own, provide the detailed actions, targets, partnership plan and temporary accommodation suitability framework required for delivery or meet the identified national publication requirements.

4.2 Deferring approval to allow further development or consultation was also considered. This is not recommended because the documents build upon the priorities and commitments already established through the Strategy, which was informed by public consultation, partner engagement and input from people with lived and living experience. Deferral would also place the council's ability to publish by 1 December 2026 at risk.

5. Community engagement and consultation

5.1 The Action Plan, which includes the Long-Term Rough Sleeping Partnership Plan, and the Suitability of Temporary Accommodation Policy, are building on the priorities, chapter and commitments agreed to within the strategy and outlining how partners will work together to deliver these commitments. Consultation was considered for the Suitability of Temporary Accommodation policy, with consultation from legal, and it was determined that public consultation would not be required as there would be a high level

of knowledge needed to review, and the policy replaces an existing policy, the allocation of temporary accommodation policy.

5.2 The Homelessness and Rough Sleeping Strategy Partnership Board includes members with lived and/or living experience, the Homelessness and Rough Sleeping Strategy Working Group has a representative from Common Ambition, and there is close co-production with the Common Ambition Lived Experience group to ensure lived and living experience of homelessness is centred.

5.3 The plans and policies have been developed through engagement with partners and people with lived and living experience, focused on how the council and its partners can improve residents' experience.

6. Financial implications

6.1 The recommendations in this report do not seek approval for additional budget provision. Delivery of the Homelessness and Rough Sleeping Action Plan, Long-Term Rough Sleeping Partnership Plan and Suitability of Temporary Accommodation Policy will be managed within existing approved budgets, confirmed external funding allocations and current resources.

6.2 Delivery will be subject to the availability of funding. Grant-funded activity must be managed in accordance with the relevant grant conditions, agreed outcomes and funding timescales. The service will maintain appropriate financial oversight and evidence delivery, as non-compliance could put current or future funding at risk.

6.3 Any additional costs arising as individual actions and delivery arrangements are developed, including temporary accommodation, commissioning, procurement or service changes, will require separate financial assessment and approval before any commitments are entered into. Unless alternative funding is identified and formally approved, any additional costs or emerging pressures will need to be contained within existing service and directorate budgets, with mitigating action identified where required.

6.4 The financial position, including grant spend, delivery risks and any impact on budgets, will be monitored through monthly Targeted Budget Management reporting. Any forecast variance or funding risk must be reported promptly and managed in accordance with the council's financial governance arrangements.

Name of finance officer consulted: Ferrise Hall Date consulted (09/10/26):

7. Legal implications

7.1 The council has already approved the overarching Strategy and this report provides the framework for its implementation. The council may tailor the locally developed plans to meet local need, provided that decisions are reasonable, comply with the public sector equality duty and do not breach the Human Rights Act. The plans cannot replace the council's housing allocations

policy and should align with it where the objective is to provide sustainable, long-term social housing. Some activity will be grant funded and the relevant conditions must be reflected in delivery arrangements.

7.2 Homelessness legislation requires any offer of temporary accommodation to be suitable. Suitability is defined through both legislation and case law. The previous policy focused particularly on out-of-area placements, which can be lawful and may sometimes still be required. Clearer definitions in the new policy will support transparent and consistent decisions, but the council will need to act in accordance with its published policy. The policy should therefore remain clear, retain appropriate flexibility and be reviewed regularly as circumstances change. It also supports the council's wider work to increase supply and improve accommodation quality.

Name of lawyer consulted: Simon Court Date consulted (29/10/26):

8. Risk implications

8.1 Failure to publish and deliver the Action Plan, Long-Term Rough Sleeping Partnership Plan and Suitability of Temporary Accommodation Policy by 1 December 2026 would result in Brighton & Hove City Council becoming non-compliant with grant funding conditions.

8.2 Failure to publish and deliver the Action Plan, Long-Term Rough Sleeping Partnership Plan and Suitability of Temporary Accommodation Policy by 1 December 2026 would reduce transparency and strategic oversight, increase operational and governance risks, and weaken the council's and its partners' ability to demonstrate effective delivery of homelessness and rough sleeping services against the Homelessness and Rough Sleeping Strategy 2025-2030.

8.3 The Action Plan, Long-Term Rough Sleeping Partnership Plan and Suitability of Temporary Accommodation Policy build on the Homelessness and Rough Sleeping Strategy 2025-2030 which recognises the wider impact of homelessness on health, safeguarding, education, employment and life opportunities.

8.4 They provide a joined-up approach to deliver against the Homelessness and Rough Sleeping Strategy and, by extension, improve outcomes for residents that contribute to the Council's ambitions for healthy, inclusive and resilient communities, underpinned by the commitments to be fair and inclusive, work in partnership and make best use of resources.

8.5 Without them, there is a risk that the Council and partners do not successfully deliver against the Homelessness and Rough Sleeping Strategy 2025-2030.

8.6 Agreement with the recommendations would enable the Council to publish the Action Plan, Long-Term Rough Sleeping Partnership Plan and Suitability of Temporary Accommodation Policy by 1 December 2026 which resolves the risk of non-compliance with MHCLG grant conditions.

8.7 The Council's commitment to being a Learning Organisation aligns with the requirement to ensure Action Plans are updated regularly to ensure they are responsive to learnings by the council, partners and those with lived and living experience. The recommendation for Cabinet to agree that the Corporate Director, Homes and Adult Social Care has the authority to review and amend targets contained within the Homelessness and Rough Sleeping Action Plans in consultation with the Cabinet Member for Housing for the duration of the Action Plans mitigates and resolves this risk.

9. Equalities implications

9.1 The Equality Impact Assessment for the Suitability of Temporary Accommodation Policy (Appendix 4) identifies both positive impacts and areas requiring continued attention. The policy provides a clearer and more consistent framework for assessing suitability and requires decisions to consider each household's circumstances, including disability and health needs, accessibility, safeguarding, children's education, caring responsibilities, affordability, employment and access to support networks. This should support fairer and more transparent decisions, particularly for households whose needs may otherwise be less well met.

9.2 The assessment also recognises that the policy is likely to have a greater impact on disabled people, women, Black and racially minoritised households, households with children, survivors of domestic abuse, care leavers, migrants and refugees, and other households with additional vulnerabilities. Limited availability of suitable temporary accommodation can affect access to schools, healthcare, employment, community connections and support networks, particularly where a household needs an adapted property, a larger home or accommodation in a specific location. The policy cannot remove these supply constraints, but it seeks to reduce their impact through individual assessments, reasonable and inclusive adjustments, case-by-case decisions and reviews where circumstances change.

9.3 The assessment therefore recommends that the policy proceeds, with its safeguards applied consistently and its impact kept under review. In line with the policy, the council will continue to record a suitability assessment for every placement and monitor suitability reviews, complaints, customer feedback, safeguarding concerns and out-of-area placements to identify any disproportionate effects. This evidence will inform the annual review of the policy and Equality Impact Assessment, or an earlier review if significant issues emerge, with any required changes reflected in service improvement plans.

9.4 The recommendations will also be taken forward through the Homelessness and Rough Sleeping Action Plan and related programmes to increase the supply, quality and range of temporary accommodation, including homes suitable for families, disabled people and households with specific support needs. This is important because a wider range of accommodation will improve the council's ability to match households to homes that meet their

assessed needs and reduce the risk of disadvantage caused by limited options. The Equality, Diversity and Inclusion Business Partner and Manager approved the assessment, describing it as comprehensive and proportionate, with appropriate mitigation and no requirement for substantial reworking or additional evidence gathering.

10. Sustainability implications

10.1 The Action Plan, Long-Term Rough Sleeping Partnership Plan and Suitability of Temporary Accommodation Policy are expected to have a positive sustainability impact through supporting healthier, safer and more secure living environments for residents experiencing or at risk of homelessness.

10.2 By improving access to suitable accommodation, reducing rough sleeping and strengthening partnership working, the proposals contribute to social sustainability, community wellbeing and improved life outcomes. The plans may also provide indirect benefits to the local economy through supporting residents to maintain accommodation, access support services and improve housing stability. There are no significant direct implications identified in relation to energy use, waste, water consumption or biodiversity.

10.3 We open an emergency weather shelter, also known as Severe Weather Emergency Protocol (SWEP) when either the temperature is predicted to drop below 0 degrees Celsius, when there is an amber weather warning, and this also includes heatwaves. These have been stood up with increasing frequency and are expected to continue to do so as part of our planning to ensure we are responding to meet people's needs during extreme weather. When SWEP is triggered, the Street Outreach Service will be out on the streets of the city directing people to shelter. SWEP provides shelter for all people experiencing rough sleeping and venues are made available to meet demand.

10.4 We will remain as flexible as possible and adapt to the needs of people experiencing rough sleeping during extreme weather to ensure vulnerable people experiencing rough sleeping are cared for, not just in extreme weather, but throughout the year.

11. Health and Wellbeing Implications:

11.1 The Action Plan, Long-Term Rough Sleeping Partnership Plan, and Suitability of Temporary Accommodation Policy are underpinned by the wider Homelessness and Rough Sleeping Strategy, which was developed with Public Health input. Collectively, these documents are expected to have a positive impact on health and wellbeing by supporting people to access safe, suitable accommodation and the wider services needed to improve outcomes and prevent homelessness.

11.2 The priorities and ways of working in these documents contribute positively to several wider determinants of health. By improving access to stable and suitable housing, they support healthy housing and help reduce the negative

physical and mental health impacts associated with homelessness and housing insecurity. The long-term partnership approach promotes stronger healthy places and communities, encouraging coordinated support across housing, health, and voluntary sector services to improve wellbeing and social inclusion.

11.3 The plans also support access to education and skills, fair employment and good work, and transport through joined-up support that helps individuals sustain accommodation and engage with services, training, employment opportunities, and local communities. In addition, by securing and maintaining suitable accommodation, individuals are better placed to access essential services and meet basic needs, including access to affordable and nutritious food.

11.4 Overall, they are expected to have a positive impact on health and wellbeing by addressing the wider social determinants of health, reducing the harms associated with homelessness and rough sleeping, and supporting people to achieve greater stability, independence and improved quality of life.

Other Implications

12. Procurement implications

12.1 The Strategy relates to a number of contracting arrangements for supporting those experiencing homelessness and rough sleeping. These are referenced in the council's annual procurement plan or specific reports to Cabinet.

13. Crime & disorder implications:

13.1 The Action Plan, Long-Term Rough Sleeping Partnership Plan, and Suitability of Temporary Accommodation Policy, together with the wider Homelessness and Rough Sleeping Strategy, are expected to have a positive impact on crime and disorder. By supporting the prevention and relief of homelessness, reducing rough sleeping, and improving access to suitable accommodation and support services, these plans and policies help address some of the underlying factors associated with vulnerability, exploitation, anti-social behaviour, and involvement in crime.

13.2 The partnership approach promotes greater collaboration between housing, community safety, health, criminal justice, and voluntary sector partners, enabling earlier intervention and more coordinated support for individuals with complex needs. The Suitability of Temporary Accommodation Policy also seeks to ensure that accommodation placements are appropriate to individual circumstances, helping to safeguard residents and support positive outcomes.

13.3 Overall, the plans and policies are expected to contribute to safer communities by reducing the risks associated with homelessness and rough sleeping, improving stability for vulnerable residents, and strengthening

multi-agency responses to prevent and address crime, anti-social behaviour, and exploitation.

14. Conclusion

14.1 Cabinet is recommended to approve the Homelessness and Rough Sleeping Action Plan, the Long-Term Rough Sleeping Partnership Plan and the Suitability of Temporary Accommodation Policy. Together, these three documents translate the Homelessness and Rough Sleeping Strategy 2025–2030 into clear actions, measurable outcomes, partnership responsibilities and governance arrangements.

14.2 Approval will strengthen accountability for preventing homelessness, reducing rough sleeping and improving temporary accommodation pathways. It will enable compliance with grant funding conditions which requires the documents to be published by 1 December 2026.

14.3 Cabinet is therefore asked to adopt and publish the three documents, which together form the Action Plan, and delegate responsibility for their implementation, including the review and amendment of Action Plan targets in consultation with the Cabinet Member for Housing, to the Corporate Director for Homes and Adult Social Care.

Supporting Documentation

Appendices

1. Appendix 1: Homelessness and Rough Sleeping Action Plans
2. Appendix 2: Policy for Ensuring the Suitability of Temporary Accommodation
3. Appendix 3: Long-Term Rough Sleeping Partnership Plan
4. Appendix 4: Equality Impact Assessment on Policy for Ensuring the Suitability of Temporary Accommodation

Background documents

1. Cabinet Report on Brighton & Hove City Council Homelessness & Rough Sleeping Strategy December 2025: Homelessness and rough sleeping strategy 2025 to 2030.pdf
2. Brighton & Hove City Council Homelessness & Rough Sleeping Strategy: Homelessness and rough sleeping strategy 2025 to 2030

Brighton & Hove Homelessness and Rough Sleeping Strategy Action Plan 2026-2029

Status: Final

Delivers the Homelessness and Rough Sleeping Strategy 2025–2030 (adopted by Cabinet on 11 December 2025)

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0. Statutory Basis and Key Dates

This Action Plan sets out how Brighton & Hove City Council (BHCC) will deliver its Homelessness and Rough Sleeping Strategy 2025–2030, adopted by Cabinet on 11 December 2025 (Agenda Item 89). It responds to the Homelessness Act 2002 duty to maintain an Action Plan underpinning the Strategy, and to the new 2026/27 grant condition requiring published and regularly updated Action Plans for authorities receiving the Homelessness, Rough Sleeping and Domestic Abuse Grant.

Requirement	Key date / detail
Homelessness and Rough Sleeping Strategy adopted	11 December 2025 (Cabinet, Agenda Item 89)
Strategy period	2025 to 2030 (renewal due by 2030, Homelessness Act 2002 s1(4))
Action Plan must be published	1 December 2026
Action Plan updated	Annually (per Cabinet report para. 3.21 commitment to report on progress and update the action plan annually)
Publication	By 30 November 2026
Targets and links submitted to MHCLG	By 1 December 2026

1. Strategic Context: Homelessness and Rough Sleeping Strategy 2025–2030

The Homelessness and Rough Sleeping Strategy 2025–2030 sets out Brighton & Hove's approach to preventing homelessness, reducing rough sleeping and improving outcomes for people experiencing housing insecurity over the next five years. It builds on the previous Homelessness and Rough Sleeping Strategy 2020–2025 and is informed by evidence gathered through the city's homelessness review, engagement with residents, partner organisations and people with lived experience.

The Strategy contributes to the delivery of the Council Plan 2023–2027 and supports the wider ambition of ensuring that residents can access safe, suitable and stable accommodation. It recognises that homelessness has significant impacts on health, wellbeing, safeguarding, education, employment and wider life opportunities, and that preventing homelessness requires coordinated action across the council, health services, voluntary and community organisations and other partners.

The Strategy is built around three priorities and one chapter which sits across all priorities:

- **Priority 1:** Increase our effectiveness in preventing homelessness and rough sleeping.
- **Priority 2:** Improve temporary accommodation pathways and experiences.
- **Priority 3:** Improve joined-up support with our partners for people who most need help.
- **Chapter:** Tackle homelessness in children, families and young people.

The Strategy places particular emphasis on prevention, recognising that better outcomes are achieved when support is provided before people reach crisis point. It also recognises the need to reduce reliance on temporary accommodation, strengthen support for people experiencing multiple disadvantage and improve outcomes for children, families and young people affected by homelessness.

Three cross-cutting commitments underpin delivery:

- Be fair and inclusive
- Work in partnership
- Make best use of resources

This Action Plan provides the framework through which the council and its partners will collectively deliver the Strategy's priorities, aligning partnership activity, performance measures and Local Outcomes Framework targets to achieve the ambitions set out in the Strategy. It includes a Suitability of Temporary Accommodation Policy and Long-Term Rough Sleeping Partnership Plan.

The Homelessness and Rough Sleeping Strategy 2025-2030 was created following a robust review of homelessness across Brighton & Hove. The Strategy includes:

- **Current and anticipated future need** including for single adults, children, families and young people
- **Activities and actions that were successfully taking place and opportunities to improve** early intervention and prevention, providing the right accommodation at the right time alongside the specialist services and support that is required to give people the best possible support to sustain their accommodation
- **Resources that are available and those that are required** spanning housing, social services, public bodies and the voluntary sector
- **Accommodation provision and suitability** across social, supported, specialist, private rented and temporary accommodation **including for vulnerable groups**

The Action Plan builds on the Homelessness and Rough Sleeping Strategy 2025-2030 using the evidence base which can be found in Section 2 to inform the delivery approach required to achieve targets and positive outcomes.

1.1 Cabinet Members and lead officers

Role	Postholder
Cabinet Member for Housing	Councillor Gill Williams
Chair of the Homelessness & Rough Sleeping Strategy Partnership Board	Councillor Paul Nann
Vice-chair of the Homelessness & Rough Sleeping Strategy Partnership Board	Councillor Emma Daniel
Corporate Director, Homes & Adult Social Care	Genette Laws
Director of Housing People Services	Harry Williams

1.2 Alignment with other strategies and plans

- Homes for Everyone – Housing Strategy 2024–2029
- Council Plan 2023–2027 (A Better Brighton & Hove for All)
- City Plan (planning framework and housing/infrastructure targets)
- Joint Health and Wellbeing Strategy; cost-of-living plan; drugs and alcohol strategy; mental health housing action plan; suicide prevention strategy; transition to adulthood strategy
- Supported housing strategy (to be developed under the Supported Housing (Regulatory Oversight) Act 2023)
- Long-Term Rough Sleeping Partnership Plan which forms part of the Action Plan – see Section 6.2
- Suitability of Temporary Accommodation Policy which forms part of the Action Plan – see Section 7
- Rough Sleeping Programme (three-year programme 2026 – 2029)

2. Evidence Base:

The Review of Homelessness in Brighton & Hove 2025 provides the evidence base for the Strategy and informs the Action Plan. Key findings and indicators are shown below:

Indicator	Figure
People experiencing homelessness in the city (Shelter estimate, June 2024)	3,580 (1 in 77 people)
...of whom living in temporary accommodation	3,528
...of whom sleeping rough	52
Homeless children aged 0–17 (approx. 40% of homeless population; 17% of city population)	1,411
Households approaching council for advice/support, 2024	2,624
Homeless applications, 2024	2,366
Households approaching before becoming homeless (prevention stage), 2024	594 (down from a peak of 854 in 2023)
Households approaching after becoming homeless (relief stage), 2024	1,230 (up from 993 in 2021)
Main housing duty acceptances, 2024 (vs. 261 in 2020)	616
Households in temporary accommodation, end of 2024	1,928
...of which contained children (47%)	~906 households

...single female + children households (21%) / single male, no children (22%) / single female, no children (11%)	see % split
...in shared facilities incl. B&B/hotels (22%) vs self-contained (78%), end 2024	417 shared / 1,511 self-contained
Households in TA, most recent published figure (June 2026)	2,292 – highest on record, up from 2,170 (late 2025)
Average wait for a social rented home / 3-bed home	3.3 years / 6.2 years
Homes privately rented in the city (vs South East 17%, England 18%)	31%
Average private rent as % of income (affordability threshold 30%)	45%
Relief duty applicants with 1+ support need / with mental health need	68% / 35%
People with 2+ compounding needs in contact with services, early 2025	704
Rough sleeping rate, March 2025 (vs South East 11.5, England 13.4 per 100,000)	30.0 per 100,000 – joint 19th highest in England
Rough sleeping annual snapshot, November 2024	76 people
Rough sleeping annual snapshot, autumn 2025 (MHCLG, published Feb 2026)	57 people (-19, -25% on 2024: 3rd largest national decrease)

3. Targets

The Homelessness and Rough Sleeping Strategy 2025 to 2030 will be monitored through a combination of the national Local Outcomes Framework (LOF) and Brighton & Hove City Council's existing local performance measures. The Local Outcomes Framework, introduced by the Ministry of Housing, Communities and Local Government (MHCLG) in 2026, provides a consistent national framework for measuring progress towards ending homelessness and rough sleeping.

The Council is required to set local targets that align with guidance and demonstrate through this Action Plan how those targets will be achieved working in partnership across Brighton & Hove. The targets have been developed using:

- Brighton & Hove baseline performance;
- benchmarking against comparable authorities;
- national targets and expectations; and
- local housing market conditions and demand pressures.

They may be revised where new evidence, national guidance or local circumstances indicate a need for adjustment.

Targets will be reviewed annually by the Homelessness and Rough Sleeping Working Group. The Working Group will present them to the Partnership Board and subsequently report to Cabinet alongside any recommendations for adjustments. These will then be published in compliance with Ministry of Housing, Communities and Local Government (MHCLG) requirements.

The evidence has been taken from a number of quantitative and qualitative data sources. These are:

- Statutory homelessness data (causes, outcomes and prevention/relief duties);
- Temporary accommodation data (use of all types of temporary accommodation including bed and breakfast);
- Equality monitoring (differential experiences and outcomes including women's rough sleeping census data);
- Benchmarking (causes, outcomes and prevention/relief duties);
- Partnership data (Joint Strategic Needs Assessment (JSNA), social care, health, probation, the Voluntary, Community and Faith Sector (VCFS) and other local partners); and
- Rough Sleeping Intelligence (rough sleeping management information and local outreach data).

3.1 Local Outcomes Framework targets

Delivery against the Local Outcomes Framework targets is outlined in Section 8 of this Action Plan, supported by the partnership arrangements described in Sections 4 and 5. Each target is linked to one or more Strategy priorities, enabling progress to be monitored through the governance framework and quarterly partnership performance reporting to the Homelessness and Rough Sleeping Partnership Board.

The table below sets out Brighton & Hove's proposed target trajectory against the national Local Outcomes Framework. The trajectory reflects the city's baseline (starting position), the scale of local housing pressures and number of people experiencing homelessness and how we are addressing the requirement to demonstrate improvement over the course of the current Parliament.

Local Outcomes Framework (LOF) metric	Baseline (2025)	Annual checkpoint (2026/27)	Annual checkpoint (2027/28)	Annual checkpoint (2028/29)	How it aligns with the Homelessness and Rough Sleeping Strategy 2025 – 2030
Households with children in temporary accommodation (rate per 1,000 households)	Sept 2025	Sept 2026	Sept 2027	Sept 2028	• **Increase effectiveness in prevention homelessness and rough sleeping (Priority 1)** • **Improve temporary accommodation pathways and experiences (Priority 2)** • **Improve joined-up support with partners for people who most need help (Priority 3)** • **Tackling homelessness in children, families and young people (Chapter)**
	6.86	6.86	6.50	6.00	
	Narrative: The rate of households with children in temporary accommodation per 1,000 households is holding at target due to ongoing pressures in the city housing market and a focus on ensuring families are placed in suitable accommodation. Affordability challenges in the private rented sector, alongside competition for housing from other groups such as students, limit the availability of family-sized homes. Families with children often require larger properties, and finding accommodation that meets both their needs and suitability requirements can be complex. Temporary accommodation includes both short-term placements and longer-term temporary homes, with a subset of these being settled homes that are suitable for medium to long-term occupation. Where permanent housing is not available, the council prioritises placing children in appropriate				

<table>
<tr><td></td><td colspan="5">accommodation rather than moving families into unsuitable housing, which contributes to the measure remaining stable.</td></tr>
<tr><td rowspan="2">Households with children in B&B over six weeks</td><td>Sept 2025</td><td>Sept 2026</td><td>Sept 2027</td><td>Sept 2028</td><td rowspan="2">Increase effectiveness in prevention homelessness and rough sleeping (Priority 1)
Improve temporary accommodation pathways and experiences (Priority 2)
Tackling homelessness in children, families and young people (Chapter)</td></tr>
<tr><td>2</td><td>0</td><td>0</td><td>0</td></tr>
<tr><td rowspan="3">Success at preventing and relieving homelessness (%)</td><td>July – Sept 2025</td><td>July – Sept 2026</td><td>July – Sept 2027</td><td>July – Sept 2028</td><td rowspan="2">Increase our effectiveness in preventing homelessness and rough sleeping (Priority 1)
Improve temporary accommodation pathways and experiences (Priority 2)
Improve joined-up support with partners for people who most need help (Priority 3)
Tackling homelessness in children, families and young people (Chapter)</td></tr>
<tr><td>37%</td><td>39%</td><td>41%</td><td>47%</td></tr>
<tr><td colspan="5">National average at start of parliament: 42.3% and 46.5% when National Plan to end Homelessness was published – target is to increase it further across Parliament.</td></tr>
</table>

Success at preventing and relieving homelessness for those experiencing multiple disadvantage (%)	July –Sept 2025	July – Sept 2026	July – Sept 2027	July – Sept 2028	• **Increase effectiveness in prevention homelessness and rough sleeping (Priority 1)** • **Improve temporary accommodation pathways and experiences (Priority 2)** • **Improve joined-up support with our partners for people who most need help (Priority 3)** • **Tackling homelessness in children, families and young people (Chapter)**
	25.16%	38.5%	41%	44%	
People sleeping rough on a single night	Snapshot count Autumn 2025	Snapshot count Autumn 2026	Snapshot count Autumn 2027	Snapshot count Autumn 2028	• **Increase our effectiveness in preventing homelessness and rough sleeping (Priority 1)** • **Improve joined-up support with our partners for people who most need help (Priority 3)** • **Tackling homelessness in children, families and young people (Chapter)**
	57	46	32	20	
	Nov 2025	Nov 2026	Nov 2027	Nov 2028	

People sleeping rough who are long-term	24	23	18	8	• **Increase our effectiveness in preventing homelessness and rough sleeping (Priority 1)** • **Improve joined-up support with our partners for people who most need help (Priority 3)**

3.2 Brighton & Hove City Council Strategy performance indicators

Alongside the national Local Outcomes Framework, Brighton & Hove City Council will continue to monitor the local performance measures contained within the Homelessness and Rough Sleeping Strategy. These measures provide more detailed information on delivery against each strategic priority and support quarterly performance review through the Homelessness and Rough Sleeping Board.

The Working Group will ensure that performance measures across all strategic priorities are disaggregated to identify outcomes for children, families and young people. This reflects the strategy's specific commitment to tackling homelessness among children, families and young people and will enable progress for these groups to be monitored across the strategy as a whole. This will be shared by the Working Group with the Partnership Board and Cabinet annually.

Priority 1: Increase effectiveness in preventing homelessness and rough sleeping

- Number of Duty to Refer referrals
- Percentage of households approaching at prevention stage
- Percentage of duties owed where homelessness was prevented
- Percentage of households placed in temporary accommodation
- Number of people sleeping rough on a single night

Priority 2: Improve temporary accommodation pathways and experiences

- Total households in temporary accommodation
- Average length of stay in temporary accommodation
- Percentage of temporary accommodation spot purchased
- Number of successful move-ons into settled accommodation

Priority 3: Improve joined-up support with partners for people who most need help

- Accommodation secured for households experiencing multiple disadvantage
- Number of households unable to be supported through specialist pathways because of unmet additional needs
- Percentage of people with multiple compound needs achieving positive outcomes across three or more life domains
- Number of people sleeping rough long-term

Chapter: Tackle homelessness in children, families and young people

- Number of 16- to 24-year-olds owed a relief duty
- Number of households with children in temporary accommodation
- Number of families in B&B accommodation beyond six weeks
- Percentage of care leavers in suitable accommodation
- Number of young people and care leavers sleeping rough

4. Local Governance Structures

The Action Plan which includes the Suitability of Temporary Accommodation Policy and the Long-Term Rough Sleeping Partnership Plan will have been submitted to Cabinet for approval prior to publication. This is the final stage in a review and approval process which has included review and approval by lived experience experts, approval by the Homelessness and Rough Sleeping Working Group and approval by the Homelessness and Rough Sleeping Partnership Board.

The Long-Term Rough Sleeping Partnership Plan aligns with the Ministry of Housing, Communities and Local Government requirements that it is collaborative and place-based, involving a wide range of partners, including commissioned and non-

commissioned support providers, and partners from health, social care, housing and community safety.

The Partnership Board consists of the Chair of the Health and Wellbeing Board (Partnership Board Chair), the Cabinet Member for Children, Families and Youth Services (Partnership Board Vice Chair), the Director of Housing People Services, the Director of Public Health, Programme Director of Integrated Service Delivery, Chair of the Homelessness and Rough Sleeping Strategy Working Group, Homelessness and Rough Sleeping Network, Young Homeless Working Group, Homelessness and Multiple Compound Needs Integrated Care Team, Temporary Accommodation Action Group, City Leadership Board, Brighton & Hove Faith in Action and two Partnership Board members with lived experience of homelessness.

The Homelessness and Rough Sleeping Strategy 2025-2030 is committed to connected partnership work across the city and centring lived and living experience. Working collaboratively with partners across housing, health, adult social care, children's services, criminal justice, education and the voluntary, community, social enterprise and faith sector (VCFS) sector to deliver shared outcomes for residents is at its heart. Delivery of this Action Plan therefore leverages an extensive partnership system, with clear governance arrangements to provide leadership, oversight, challenge and accountability.

Brighton & Hove City Council plays a convening role within this system. Delivery sits across multiple organisations and partnerships throughout the city. Progress against the Local Outcomes Framework targets and Action Plan commitments will be monitored through existing partnership structures, with the Homelessness and Rough Sleeping Partnership Board acting as the primary strategic oversight and escalation body, supported by delivery coordination through the Homelessness and Rough Sleeping Working Group.

4.1 Governance structure

Body / Role	Responsibility	Membership	Frequency
Cabinet Member for Housing	Political oversight of the Strategy and Action Plan. Receives strategic updates on performance, delivery and risks.	Cabinet Member	Cabinet cycle

Corporate Director, Homes and Adult Social Care (SRO)	Overall accountability for delivery of the Strategy, Action Plan and partnership arrangements.	Corporate Director, Brighton & Hove City Council	Ongoing
Director, Housing People Services	Oversight and scrutiny of delivery, outcomes and performance against the Action Plan and alignment with the Homelessness and Rough Sleeping Strategy 2025-2030.	Lead Officer, Brighton & Hove City Council and Partnership Board member	Ongoing
People Overview and Scrutiny Committee	Democratic scrutiny of delivery, outcomes and performance.	Elected Members	As required
Health and Wellbeing Board	Strategic oversight of health, wellbeing, prevention and health inequalities relating to homelessness and rough sleeping.	Housing, health, public health, adult social care and multiple compound needs partners	Board cycle
Homelessness and Rough Sleeping Partnership Board	Strategic oversight of delivery of the Action Plan, review of progress against Local Outcomes Framework targets, oversight of strategic risks, and escalation where required	Council services, NHS, VCSE partners and lived experience representatives	Quarterly
Homelessness and Rough Sleeping Working Group	Coordinates delivery by partner agencies, monitors performance and milestones, manages delivery risks and interdependencies, and escalates strategic issues to the Partnership Board	Council services, NHS, VCSE partners	Monthly (fortnightly when required)
Homelessness and Rough Sleeping Network	Sector-wide collaboration, partnership working and service coordination across the homelessness system.	VCSE organisations with other homelessness partners in attendance by invitation.	Quarterly
Homelessness Operational Forum	Operational coordination, service updates, emerging issues and information sharing across homelessness services.	Providers and commissioners	Monthly

Multiple Compound Needs Transformation Programme Board	Oversees delivery of the city's Multiple Compound Needs transformation programme and integration across housing, health, social care and criminal justice services.	NHS, Brighton & Hove City Council, VCSE and system partners	Programme cycle
Multiple Compound Needs Strategic Sponsors Group (Sussex)	Provides senior-level leadership and oversight for system change relating to people experiencing multiple compound needs, ensuring partner agencies work together to improve outcomes and remove barriers.	Senior partner representatives	Programme cycle
Multi Agency Homeless Health Meeting	Coordination between housing, homelessness and health services to improve healthcare access and reduce health inequalities.	Health and homelessness partners	Regular
Mental Health Accommodation Group	Oversees delivery of the Mental Health and Housing Plan and accommodation pathways for people with mental health needs.	Housing, NHS and mental health partners	Regular
Common Ambition	Lived experience partnership supporting co-production, pathway design, service improvement and system change.	People with lived experience and partner organisations	Ongoing
Safeguarding Adults Board	Strategic oversight of safeguarding arrangements affecting adults at risk, including people experiencing homelessness, rough sleeping and multiple compound needs. Shares learning from Safeguarding Adults Reviews and supports system improvement.	Statutory safeguarding partners and wider agencies	Board cycle
Brighton & Hove Safeguarding Children Partnership	Strategic oversight of safeguarding arrangements affecting children, young people and families experiencing homelessness.	Children's services, health, police and safeguarding partners	Board cycle

Young Homeless Working Group	Strategic partnership group focused on preventing and reducing youth homelessness and improving outcomes for young people, care leavers and young families.	Brighton & Hove City Council, YMCA DownsLink Group and youth homelessness partners	Quarterly
Temporary Accommodation Action Group	Strategic partnership group focused on improving temporary accommodation standards and the experience of those living in temporary accommodation across Brighton & Hove.	People with current or past lived experience of temporary accommodation, Brighton & Hove City Council, councillors, housing providers, health and support services	Quarterly
Families in Temporary Accommodation Working Group	Sub-group of the Temporary Accommodation Action Group established to strengthen partnership working between agencies supporting families living in temporary accommodation and develop practical solutions that improve outcomes for families living in temporary accommodation.	Multi-agency forum that brings together Brighton & Hove City Council, statutory, voluntary, community and faith sector partners	Quarterly

The Homelessness and Rough Sleeping Partnership Board will receive performance information linked to the Local Outcomes Framework, delivery updates from lead partners and progress reports on Action Plan implementation. The Board will provide a forum for strategic oversight, challenge and assurance regarding outcomes across partner organisations.

The Action Plan is underpinned by a partnership approach, recognising the equal and complementary contribution of both statutory and non-statutory partners in delivering shared objectives and improving outcomes for residents. The Homelessness and Rough Sleeping Working Group will support coordination across delivery partners, helping to minimise duplication and ensure activity is aligned across related work programmes.

5. How Partnerships Work Across Brighton & Hove

Preventing and reducing homelessness and rough sleeping requires coordinated action across housing, health, social care, children's services, criminal justice agencies, education providers and the voluntary, community, social enterprise and faith (VCSF) sectors. The city's partnership arrangements support prevention, early intervention, coordinated support and long-term system change. Further information on how these partnerships will work together to deliver the priorities, outcomes and actions set out in the Homelessness and Rough Sleeping Strategy 2025-2030 is provided in Section 8 of this Action Plan, including the delivery approach and activity that will be taken forward through partnership working.

5.1 Homelessness and rough sleeping partnerships

These partnerships provide strategic and operational leadership for the homelessness system.

Partnership	Role
Homelessness and Rough Sleeping Partnership Board	Strategic oversight of delivery of the Strategy, Action Plan and Local Outcomes Framework targets.
Homelessness and Rough Sleeping Network	Sector-wide collaboration and coordination across homelessness services.
Homelessness Operational Forum	Operational coordination, intelligence sharing and service improvement.
Young Homeless Working Group	Strategic oversight of youth homelessness, care leavers and young families.
Common Ambition	Lived experience, co-production and system improvement.
Temporary Accommodation Action Group	Cross-sector, collaborative, action-focused group driving positive change in temporary accommodation
Families in Temporary Accommodation Working Group	Sub-group of the Temporary Accommodation Action Group. Facilitates collaborative partnership working between agencies supporting families living in temporary accommodation and develops practical solutions, improving outcomes

Brighton & Hove Frontline Network	Frontline workers monthly meeting to share experiences, expertise and learnings to create better ways of working, greater insight and improved outcomes across frontline services

5.2 Health, safeguarding and Multiple Compound Needs partnerships

Many people experiencing homelessness have multiple compound needs which may include poor physical health, poor mental health, substance use, domestic abuse, safeguarding concerns or social exclusion. The following partnerships support integrated responses across these systems.

Partnership	Role
Health and Wellbeing Board	Strategic oversight of health inequalities, prevention and wellbeing outcomes
Multiple Compound Needs Transformation Programme Board	Oversees delivery of the city's Multiple Compound Needs transformation programme
Multiple Compound Needs Integrated Care team	Specialised joined-up approach to break cycles of exclusion and poor health
Multiple Compound Needs Strategic Sponsors Group (Sussex)	Provides senior-level leadership and oversight for system change relating to people experiencing multiple compound needs, ensuring partner agencies work together to improve outcomes and remove barriers
Multi Agency Homeless Health Meeting	Coordinates work between housing, homelessness and healthcare services
Mental Health Accommodation Group	Oversees delivery of the Mental Health and Housing Plan and accommodation pathways
Safeguarding Adults Board	Provides oversight of safeguarding arrangements affecting adults experiencing homelessness, rough sleeping and multiple disadvantage
Brighton & Hove Safeguarding Children Partnership	Provides oversight of safeguarding arrangements affecting children, young people and families experiencing homelessness

Combatting Drugs Partnership Board	Coordinates local action on drug-related harm, improving treatment and recovery outcomes, and delivers the objectives of the national drugs strategy
Refugee and Migrant Forum	Coordinates statutory and voluntary sector partners to coordinate support, improve access to services and address the needs of refugees, asylum seekers and migrants across the city

5.3 Prevention and early intervention partnerships

A core objective of the Strategy is to reach people before crisis occurs so that, through early intervention, we can prevent homelessness occurring in as many instances as possible within Brighton & Hove. This relies on joint working across public services and partner organisations across the city.

Partnership approach	Contribution
Duty to Refer	Moving Duty to Refer referrals further upstream than the statutory 56 days to allow greater time to achieve early intervention and prevention outcomes. A referral cannot be made without the person's consent. Specified public authorities are required to identify and refer a service user who is experiencing homelessness or may be threatened with homelessness, to a local housing authority of the service user's choice. The service user must consent to the referral being made. The consent can be made in writing or given orally. The person referring should follow the agreed processes set out in their agency's internal guidance. A person is considered homeless if: • they do not have any accommodation which is available for them which they have a legal right to occupy; or,

	• it is not reasonable for the person to occupy their current accommodation, for example, because they would be at risk of domestic abuse. Someone is defined as being threatened with homelessness where they are likely to become homeless within 56 days or have been served with a valid notice under section 21 of the Housing Act 1988 by their landlord, which expires within 56 days. Public authorities with a Duty to Refer: • prisons • young offender institutions • secure training centres • secure colleges • youth offending teams • probation services (including community rehabilitation companies) • Jobcentres • social service authorities (both adult and children's) • emergency departments • urgent treatment centres • hospitals in their function of providing inpatient care • Secretary of State for defence in relation to members of the regular armed forces Statutory obligation under the Homelessness Reduction Act 2017 (effective October 2018) requires specified public authorities in England to notify a local housing authority if they come across a service user they think is homeless or at risk of homelessness within 56 days.

	Brighton & Hove City Council is working closely with partners to move referrals as far upstream as possible (earlier than the statutory 56 days) to enable improved outcomes at the prevention and early intervention stage. It is aligned with the Homelessness and Rough Sleeping Strategy 2025-2030, Priority 1: Increase our effectiveness in preventing homelessness and rough sleeping and our commitment as a city to increase early intervention and prevention outcomes to achieve better person centred and trauma informed outcomes.
Duty to Refer training	Brighton & Hove City Council has already begun working with statutory and voluntary sector partners to strengthen understanding of Duty to Refer responsibilities, promote good practice and improve referral quality. This supports the council's ambition to identify housing need earlier and move prevention activity further upstream than the statutory 56-day threshold, increasing opportunities to prevent homelessness before crisis point. It recognises that successful outcomes for upstream early intervention and work will not only be achieved via public authorities with a Duty to Refer. Further information on our prevention and early intervention delivery is included in Section 8 of this Action Plan.
Co-location and integrated working	We commit to building on the success of co-location opportunities between housing services and partner organisations to support earlier identification of housing issues, improve access to advice and support, and strengthen joint working around households at risk of homelessness. This contributes to a more coordinated prevention approach and helps ensure residents receive support at the earliest opportunity whilst also upskilling team members in the housing services and partner organisations where co-location is occurring. Early findings are indicating that people who would not have been able to access support via existing routes are able to engage with support at ‘compulsory appointments’ including those experiencing domestic abuse who may otherwise not be alone to share their experience and seek support. Co-located and integrated working spans a range of partners across Brighton & Hove including the DWP / Job Centre and the Clock Tower Sanctuary which is a day centre for young people experiencing homelessness.

	Further information on our prevention and early intervention delivery is included in Section 8 of this Action Plan.
Ask and Act pilots	The council are working with partners to pilot Ask and Act approaches that encourage frontline staff to identify housing concerns during routine interactions and connect residents to support before homelessness occurs. An initial six-month pilot is underway with a GP surgery and community hub in Brighton & Hove. The approach taken and communications shared have been created in consultation with people with lived experience via Common Ambition who receive funding from Brighton & Hove City Council to enable lived and living experience to be centred in service design, delivery and iteration. This supports earlier intervention and prevention by meeting people where they are, in a safe space to share their situation, increases opportunities for prevention and helps embed homelessness prevention across a wider range of services whilst educating partner organisations about the ways that people may be at risk of or experiencing homelessness. We will be responding to findings throughout the six-month pilot and will refine, extend and expand dependent on seeing an increase in early intervention and prevention referrals via this pilot. Further information on our prevention and early intervention delivery is included in Section 8 of this Action Plan.
Temporary Accommodation Duty to Notify	Effective from September 2026, we have been undertaking Temporary Accommodation Duty to Notify as a city, recognising that is a legal requirement under the Children's Wellbeing and Schools Act 2026 for local housing authorities to notify schools, GP practices, and health visiting services when a child is placed in temporary accommodation. It requires parent or applicant consent before sharing details. It falls within our commitment to better coordinate health and education support for children experiencing homelessness across Brighton & Hove. It is aligned with the collaborative way of working with partners laid out in the Homelessness and Rough Sleeping Strategy 2025-2030 especially with the chapter on Children, Families and Young People, Priority 2: Improve temporary accommodation pathways and experiences and Priority 3: Improve joined-up support with our partners for people who most need help.

City Leadership Board	Strategic leadership across partner organisations, helping to coordinate a whole-system approach to addressing homelessness and rough sleeping and improving outcomes for residents. It aligns with the three priorities and chapter contained within the Homelessness and Rough Sleeping Strategy 2025-2030.
Housing, welfare and financial inclusion partnerships	Support households to sustain accommodation and reduce homelessness risk.
Children's services partnerships	Early identification of homelessness risks affecting children, families and care leavers.
Health and community partnerships	Support people whose physical health, mental health or wider vulnerability increases homelessness risk.
Voluntary and community sector partnerships	Improve access to support, advice and early intervention for groups who may not engage with statutory services.
Community Policing	Works with local partners and communities to identify and respond to issues that contribute to homelessness and rough sleeping, supporting safer communities and improved outcomes for vulnerable residents.
Business Crime Reduction Group	A business-led action group that works with Police and local authorities to prevent and reduce crime, anti-social behaviour, and disorder affecting local businesses.
Community Safety Partnerships	Connects statutory agencies and local partners to reduce crime, anti-social behaviour and vulnerability, supporting coordinated action to improve safety and wellbeing, including for people experiencing homelessness and rough sleeping.
Chamber of Commerce	Connects local businesses with citywide charities and support networks to address the rising numbers of people experiencing homelessness and rough sleeping
Core Cities Partnership	Connects major UK cities to share best practice, influence national policy and collaborate on solutions to common challenges, including homelessness, rough sleeping, housing and inequality.

5.4 Preventing homelessness at key transition points

We recognise that partnership arrangements are particularly important where people are moving between institutions, services or accommodation settings and may be at increased risk of homelessness. As a city, we are committed to improving data sharing to ensure that suitable accommodation and wraparound support can be provided in a timely way to prevent people experiencing homelessness.

Group	Local partnership arrangements
People leaving prison or probation services	Joint working between housing services, probation, supported accommodation providers and homelessness services to improve accommodation outcomes and reduce rough sleeping following release.
People leaving residential substance use treatment / Residential rehabilitation	Partnership working between housing services, treatment providers, public health and supported accommodation services to ensure housing needs are identified early, accommodation is secured where required and appropriate support is available to sustain recovery and prevent homelessness.
Young people leaving care	Corporate Parenting responsibilities supported through the Care Leavers Housing Protocol, Local Offer for Care Leavers and joint working between Housing and Children's Services.
Young people transitioning to adulthood	Arrangements between housing, children's services, education, health and support providers help ensure young people transitioning to adulthood receive coordinated support, appropriate accommodation and timely interventions to prevent homelessness and promote independence.
Hospital discharge	Joint working between housing services, NHS partners, homeless healthcare services and discharge teams to prevent discharge into homelessness or rough sleeping.
People discharged from inpatient mental health services	Joint working between housing services, Sussex Partnership NHS Foundation Trust, mental health accommodation pathways and community support services to prevent discharge into homelessness and ensure appropriate housing and support arrangements.
People leaving supported accommodation	Coordinated move-on planning and tenancy sustainment support to reduce repeat homelessness.

Refugees and people seeking asylum	Partnership working with specialist refugee and migration organisations to provide targeted advice, support and prevention interventions.
Survivors of domestic abuse	Coordinated support through housing, safeguarding, specialist domestic abuse services and wider Sussex partnership arrangements.

6. Specific Plans

6.1 B&B Elimination Plan

Based on current published evidence, 22% of temporary accommodation households (417 of 1,928) were accommodated in shared facilities, including bed and breakfast accommodation and hotels, at the end of 2024. There is currently no evidence of families routinely remaining in bed and breakfast accommodation beyond the statutory six-week limit. However, it remains an area of focus for the Brighton & Hove and the approach is detailed below.

The Council does not have a policy of routinely placing families in bed and breakfast accommodation and seeks to provide suitable alternative temporary accommodation wherever possible. We will continue to work with accommodation providers and housing partners to reduce the use of bed and breakfast accommodation for families, increase access to suitable alternative accommodation, and support timely move-on into settled housing.

Compliance with the six-week statutory limit and the use of bed and breakfast accommodation for families will be monitored regularly through homelessness performance reporting by the Homelessness and Rough Sleeping Working Group. Where monitoring identifies emerging risks, increasing use of bed and breakfast accommodation, or any evidence of families exceeding the statutory limit, further actions, including the development of a dedicated improvement or elimination plan, will be considered and implemented as required and will be escalated by the Working Group via the escalation process outlined in section 9.2.

Performance against the six-week limit for families placed in B&B accommodation is captured through our H-CLIC returns to government. H-CLIC temporary accommodation data is submitted and quality-assured quarterly, providing ongoing monitoring of the number of families remaining in B&B beyond six weeks and enabling performance and remedial action to be taken, tracked and monitored at a service level before being reported to the Working Group.

6.2 Long-Term Rough Sleeping Partnership Plan

The Long-Term Rough Sleeping Partnership Reduction Plan forms the primary delivery mechanism for Strategy Priority 3.3, which is to support people experiencing rough sleeping access services and accommodation and contributes directly to Priority 3.1, which is target support for people who are most vulnerable, and Priority 3.2, which is create integrated services for people with multiple compound needs. Delivery against the actions, outcomes and performance framework contained within the Partnership Plan will be reported through the Homelessness and Rough Sleeping Partnership Board and incorporated into Local Outcomes Framework reporting where relevant.

LONG-TERM ROUGH SLEEPING PARTNERSHIP PLAN

7. Suitability of Temporary Accommodation Policy

The Suitability of Temporary Accommodation Policy ensures suitability after assessment and addresses supply, procurement and allocation of accommodation. It forms the primary delivery mechanism for Strategy Priority 2 which is to improve temporary accommodation pathways and experiences. It aligns and contributes directly to Priority 2.1 improving move on from temporary accommodation into settled housing, and Priority 2.3 improving the supply and quality of temporary accommodation.

Reducing demand and improving move-on: The Council will seek to reduce demand for temporary accommodation through earlier homelessness prevention, tenancy sustainment and improved access to alternative housing options. Where temporary accommodation is required, we will work with households and partners to identify barriers to move-on, support access to social and private rented housing, and reduce avoidable lengths of stay. We will also continue to develop the supply of suitable accommodation and reduce reliance on costly emergency and spot-purchased placements.

Performance and monitoring: Progress will be monitored through regular performance reporting, including the number of families in B&B and any remaining beyond six weeks, the average length of stay in temporary accommodation, the cost and use of different accommodation types, the proportion of spot-purchased placements, suitability and quality issues, and successful move-ons into settled accommodation. Relevant temporary accommodation information will also be reported through quarterly H-CLIC returns.

Performance will be reviewed through the Homelessness and Rough Sleeping Working Group and reported quarterly to the Partnership Board, with remedial action and escalation where performance is off track.

The Suitability of Temporary Accommodation Policy includes the following areas of focus:

Safeguarding and welfare: Temporary accommodation arrangements which support statutory duties, including safeguarding and promoting the welfare of children, drawing on partner expertise where relevant.

Suitability in practice: The policy clearly sets out how decisions relating to the suitability of temporary accommodation will be made in a consistent way, taking account of quality, safety, location and household needs. This demonstrates how temporary accommodation supports in the delivery of Local Outcomes Framework targets.

Quality assurance and oversight: Partners can support ongoing quality and suitability through regular reviews, audits or checks to ensure accommodation remains safe, appropriate and responsive to changing needs. The Council, people with living experience and the temporary accommodation providers will complete a Quarterly Performance Report which includes KPIs. This aligns with the Procurement Act 2023 to ensure quality assurance and oversight.

Move-on and system flow: Effective use of temporary accommodation will support people to move on from temporary accommodation in a timely way whilst being careful to safeguard so that those leaving temporary accommodation do not experience rough sleeping again. This considered approach will reduce the length of stay in temporary accommodation and contribute to better value for money and prevention outcomes across the system.

SUITABILITY OF TEMPORARY ACCOMMODATION POLICY

8. Delivering the Priorities and Chapter within the Homelessness and Rough Sleeping Strategy

The following section sets out the approach partners will take to deliver each priority within the Homelessness and Rough Sleeping Strategy. It describes how services, organisations and communities will work together to achieve the outcomes set out within it. Detailed delivery actions, milestones and implementation arrangements will be maintained through collaborative partnership programmes of work and reviewed through the governance arrangements set out in Section 4.

8.1 Our Approach to Delivery:

The Homelessness and Rough Sleeping Strategy will be delivered through a collaborative partnership approach that reflects the complex and interconnected causes of homelessness. Housing insecurity is influenced by a range of factors, including health, mental health, substance use, domestic abuse, safeguarding concerns, poverty and social exclusion. Addressing these challenges requires coordinated action across housing, health, adult social care, children's services, criminal justice agencies, public health, education providers, the voluntary, community, faith and social enterprise (VCFSE) sector, and people with lived experience.

The Strategy is based on a shared commitment to prevention, early intervention and person-centred, trauma-informed support. We will work together to identify need earlier, improve access to services, develop more coordinated responses and create pathways that help residents achieve sustainable housing outcomes. Delivery will be embedded within existing partnerships, programmes and services, enabling organisations to align resources, expertise and activity towards shared objectives.

The council will provide strategic leadership, support partnership development and help drive collective action across the system. Delivery responsibility sits with partner organisations through collaborative programmes of work coordinated through the Homelessness and Rough Sleeping Working Group.

Progress will be reported to and scrutinised by the Homelessness and Rough Sleeping Partnership Board, which provides strategic oversight, challenge and escalation. Together, the Action Plan, Local Outcomes Framework and wider performance measures provide a shared framework for assessing progress and ensuring partners across the city remain focused on achieving the Strategy's ambitions.

Strengthening prevention and early intervention

Local evidence shows that more households are approaching the council once they are already experiencing homelessness than at the prevention stage. In 2024, 594 households approached for support while threatened with homelessness, compared with 1,230 households who approached after homelessness had already occurred. In response, partners will focus on identifying housing risks earlier and increasing referrals before crisis point. This includes strengthening Duty to Refer arrangements with statutory partners, delivering targeted Duty to Refer training, expanding co-location opportunities, piloting Ask and Act approaches, improving data sharing and intelligence-led identification of risk, and embedding homelessness prevention conversations within universal services such as health, education, employment and community-based support. Together, these activities will continue to move prevention

further upstream, increase the number of households receiving support before becoming homeless, and improve homelessness prevention outcomes.

Embedding Equality Impact Assessment Recommendations

The Homelessness and Rough Sleeping Strategy 2025-2030 is underpinned by a commitment to fairness, inclusion and reducing inequalities. The findings and recommendations of the Equality Impact Assessment (EIA) will be embedded throughout delivery of this Action Plan and considered across all priorities, programmes of work and partnership activity. This includes improving equality monitoring and data collection, strengthening understanding of the needs and experiences of different groups, and ensuring that services are designed and delivered in ways that are accessible, inclusive and responsive to diverse needs.

Delivery partners will work collaboratively to implement priority recommendations identified through the EIA, including strengthening support for children, families and young people, improving outcomes for Gypsy, Roma and Traveller communities, women, older people, people from Black, Mixed and Other ethnic groups, disabled people, and people experiencing multiple disadvantage. The council and its partners will use evidence, lived experience, needs assessments, service reviews and targeted pilot activity to identify and address inequalities, improve prevention and early intervention approaches, and ensure accommodation and support services meet a wide range of needs.

Progress will be monitored through equality performance reporting, analysis of outcomes for different groups, regular review of emerging evidence and oversight through the Homelessness and Rough Sleeping Working Group and Partnership Board. Where inequalities or barriers are identified, partners will agree and implement targeted actions, evaluate impact and scale successful approaches. This will help ensure that delivery of the Action Plan contributes to reducing inequalities and improving outcomes for all residents at risk of or experiencing homelessness.

Priority 1: Increase effectiveness in preventing homelessness and rough sleeping

We will take a whole-system approach to homelessness prevention, bringing together housing, health, employment, education, welfare and voluntary sector partners to identify risk earlier and intervene before people reach crisis point. We will continue to move prevention upstream by embedding housing conversations within universal and community services, improving access to support before homelessness occurs. We will measure success through increased early referrals, improved engagement with support

services, evidence of joint working across agencies, and improved homelessness prevention outcomes. We will build on the strong partnerships already established across the city, including with organisations such as the Department for Work and Pensions and Clock Tower Sanctuary, to provide coordinated support that meets the needs of residents at the earliest opportunity.

How we will measure progress:

- Number of Duty to Refer referrals
- % presenting at prevention duty stage
- % of duties owed where homelessness was prevented
- % of households placed in temporary accommodation
- Number of people sleeping rough on a single night

Local Outcome Framework Target(s):

- Success at preventing and relieving homelessness (%)
- Success at preventing and relieving homelessness for those experiencing multiple disadvantage (%)
- Households with children in temporary accommodation
- Number of people sleeping rough on a single night
- Number of people sleeping rough who are long-term
- Households with children in B&B over six weeks

Action	LOF Target(s) Supported	How the Action Contributes	Key Agencies
1.1 Early identification of risk and early intervention			
Develop and implement a multi-agency approach to identifying households at risk of homelessness through data	Success at preventing and relieving homelessness (%) Success at preventing and relieving homelessness for those experiencing multiple disadvantage (%)	Earlier identification enables preventative interventions before a housing crisis develops, increasing successful prevention outcomes and supporting people	Brighton & Hove Housing, NHS Sussex, Brighton & Hove Adult Social Care, Brighton & Hove Children's Services, DWP/Jobcentre Plus, commissioned homelessness services,

sharing, intelligence gathering and targeted early intervention		with complex needs before homelessness occurs	businesses, education, working group
• **Year 1:** Review existing data sources, identify opportunities for earlier intervention and develop a multi-agency approach to risk identification. • **Year 2:** Build on existing data sharing and intelligence-led approaches with key partners to improve predictive approaches and strengthen early identification of households at risk. • **Year 3:** Expand a coordinated partnership approach to data sharing and targeted early intervention across the city.			
Strengthen pathways with universal services to improve early identification, referral and support for households at risk of homelessness	Success at preventing and relieving homelessness (%) Success at preventing and relieving homelessness for those experiencing multiple disadvantage (%) Households with children in temporary accommodation	Earlier referrals increase opportunities to sustain existing accommodation or secure alternative housing before temporary accommodation is required.	Brighton & Hove Housing, NHS Sussex, Primary Care, Hospitals, Jobcentre Plus, education providers, foodbanks, VCSE organisations, businesses, education, working group
• **Year 1:** Review referral pathways and increase awareness of homelessness prevention across universal services. • **Year 2:** Strengthen referral arrangements through training, co-location opportunities and targeted partnership initiatives. • **Year 3:** Embed consistent referral pathways and assess impact on prevention outcomes and early intervention.			
1.2 Support people to stay in their homes or find a new home			
Develop an integrated tenancy sustainment model bringing together housing, employment, welfare and financial inclusion support.	Households with children in temporary accommodation Success at preventing and relieving homelessness (%) Success at preventing and relieving homelessness for those experiencing multiple disadvantage (%)	Improves tenancy sustainment, reduces loss of accommodation and supports households to remain housed, reducing demand for temporary accommodation.	Brighton & Hove Housing, DWP/Jobcentre Plus, Citizens Advice, social landlords, Brighton & Hove Adult Social Care, employment and skills providers, working group

• **Year 1:** Map existing tenancy sustainment services and identify opportunities for integration. • **Year 2:** Implement a coordinated tenancy sustainment approach across key services and partners. Evaluate and iterate quarterly. • **Year 3:** Continue to use learnings to improve outcomes and reduce homelessness by embedding and expanding successful approaches.			
Increase access to suitable accommodation within the private rented sector and social housing.	Households with children in temporary accommodation Households with children in B&B over six weeks Success at preventing and relieving homelessness (%)	Expands housing options for households facing homelessness and supports move-on from temporary accommodation, reducing reliance on B&B placements.	Brighton & Hove Housing, Registered Providers, private landlords, lettings sector, resettlement services, working group
• **Year 1:** Review barriers to accessing accommodation and identify opportunities to increase housing options. Increase housing supply of suitable accommodation through procurement by Brighton & Hove City Council ensuring alignment with the Rough Sleeping Programme and Suitability of Temporary Accommodation Policy. • **Year 2:** Strengthen partnership working with landlords and housing providers and implement targeted initiatives. This will include quarterly performance reviews contract managed by the Temporary Accommodation team at Brighton & Hove City Council. • **Year 3:** Expand successful approaches and monitor impact, applying learnings to ensure an increase in successful homelessness prevention and move-on outcomes.			
Improve access to culturally appropriate homelessness information, advice and support for Black and Racially Minoritised communities, refugees and asylum seekers.	Success at preventing and relieving homelessness (%) Success at preventing and relieving homelessness for those experiencing multiple disadvantage (%)	Increases access to early support, reduces barriers to services and improves prevention outcomes for communities at increased risk of housing exclusion.	Brighton & Hove Housing, BMECP Centre, Migrant Help, Community Works, faith groups, VCSE sector, working group
• **Year 1:** Engage communities and partners to identify barriers and gaps in provision. • **Year 2:** Develop and deliver targeted information, advice and support initiatives. • **Year 3:** Embed good practice and evaluate effectiveness in improving access and outcomes.			
1.3 Targeted prevention for people at risk of rough sleeping			
Develop and implement a sustainable No First Night Out	People sleeping rough on a single night	Prevents first-time rough sleeping episodes and intervenes earlier	Brighton & Hove Housing, Outreach services,

approach for people at greatest risk of rough sleeping.	People sleeping rough who are long-term Success at preventing and relieving homelessness for those experiencing multiple disadvantage (%)	with people at highest risk, reducing overall and repeat rough sleeping.	supported accommodation providers, health partners, Brighton & Hove Adult Social Care, Probation Service, working group
• **Year 1:** Review current arrangements and agree a sustainable No First Night Out model. • **Year 2:** Implement and refine the approach through partnership delivery. • **Year 3:** Embed the model and evaluate impact on rough sleeping prevention outcomes.			
Strengthen prevention pathways for people leaving institutions, care settings and supported accommodation.	People sleeping rough on a single night People sleeping rough who are long-term Success at preventing and relieving homelessness for those experiencing multiple disadvantage (%)	Reduces the number of people leaving institutional settings without accommodation and prevents transitions into rough sleeping and repeat homelessness.	Brighton & Hove Housing, Prisons, Probation, Hospitals, Brighton & Hove Adult Social Care, Brighton & Hove Children's Services, supported housing providers, working group
• **Year 1:** Review existing transition pathways and identify gaps and risks. • **Year 2:** Develop and implement strengthened multi-agency protocols and referral arrangements. • **Year 3:** Embed pathways and monitor effectiveness in preventing homelessness and rough sleeping.			

Priority 2: Improve temporary accommodation pathways and experiences

We will work with accommodation providers, housing partners, support services, the Temporary Accommodation Action Group, and the voluntary and community sector to create a more joined-up temporary accommodation system that focuses on stability, wellbeing and successful move-on to settled housing. Our approach will focus on understanding and responding to the diverse needs of households, improving the quality and suitability of accommodation, strengthening support during placements, and increasing access to sustainable housing options. Through closer partnership, person-centred and trauma-informed working, including Duty to Notify, we

will seek to reduce time spent in temporary accommodation, reduce the need to repeat experiences, and improve outcomes for residents.

How we will measure progress:

- Total number of people in temporary accommodation
- Average length of stay in temporary accommodation
- % of temporary accommodation spot purchased
- Successful move-ons per quarter

Local Outcome Framework Target(s):

- Households with children in temporary accommodation
- Households with children in B&B over six weeks
- Success at preventing and relieving homelessness (%)
- Success at preventing and relieving homelessness for those experiencing multiple disadvantage (%)

Action	LOF Target(s) Supported	How the Action Contributes	Key Agencies
2.1 Improve move on from temporary accommodation into settled housing			
Develop and implement bespoke move-on pathways from temporary accommodation into settled housing through partnership working with social housing providers and supported housing services.	Households with children in temporary accommodation Households with children in B&B over six weeks	Increases opportunities for planned move-on into settled housing, reducing the number of households remaining in temporary accommodation and reducing pressure on emergency accommodation.	Brighton & Hove Housing, Registered Providers, supported housing providers, Homes for Brighton & Hove partners, VCSE sector, working group
• **Year 1:** Map existing move-on routes and identify barriers to settled housing. • **Year 2:** Implement enhanced move-on pathways with housing providers and partners.			

• **Year 3:** Embed and evaluate pathways to improve housing outcomes and reduce temporary accommodation demand.			
Develop an intensive personalised move-on support offer for households in temporary accommodation, including housing advice, practical assistance and tenancy sustainment support.	Households with children in temporary accommodation Households with children in B&B over six weeks Success at preventing and relieving homelessness (%)	Removes barriers to accessing settled accommodation and supports households to sustain tenancies, increasing successful housing outcomes.	Brighton & Hove Housing, Registered Providers, Citizens Advice, commissioned support providers, DWP/Jobcentre Plus, working group
• **Year 1:** Design the support model and identify priority groups requiring additional assistance. • **Year 2:** Implement the support offer and monitor outcomes. • **Year 3:** Refine and embed the service based on evidence and resident feedback.			
2.2 Support people living in temporary accommodation			
Explore and develop floating support provision for people living in temporary accommodation to improve wellbeing, independence and readiness for move-on.	Households with children in temporary accommodation Success at preventing and relieving homelessness for those experiencing multiple disadvantage (%)	Supports households to maintain stability, address support needs and prepare for successful move-on into settled housing.	Brighton & Hove Housing, Commissioned support providers, Brighton & Hove Adult Social Care, VCSE organisations, health partners, working group
• **Year 1:** Assess need and explore options for floating support provision. • **Year 2:** Pilot or implement floating support for identified cohorts. • **Year 3:** Evaluate effectiveness and expand successful approaches where appropriate.			
Undertake a comprehensive assessment of the needs of households in temporary accommodation and use findings to inform service design and commissioning.	Households with children in temporary accommodation Households with children in B&B over six weeks	Improves understanding of need and enables development of targeted interventions that support move-on and reduce time spent in temporary accommodation.	Brighton & Hove Housing, Brighton & Hove Public Health, Adult Social Care, Children's Services, NHS Sussex, commissioned providers, working group
• **Year 1:** Complete a citywide needs assessment and use this to ensure that the service design and processes remain responsive and up-to-date. • **Year 2:** Take an iterative approach to findings to ensure that learnings are continually being applied and informing commissioning priorities.			

• **Year 3:** Continue to review progress and update priorities in response to emerging needs.			
2.3 Improve the supply and quality of temporary accommodation			
Develop and implement a temporary accommodation recovery plan to manage demand, improve financial sustainability and respond to changes in the housing market.	Households with children in temporary accommodation Households with children in B&B over six weeks	Supports a sustainable temporary accommodation system capable of meeting demand while reducing reliance on unsuitable accommodation.	Brighton & Hove Housing, Brighton & Hove Finance, Brighton & Hove Procurement, Registered Providers, accommodation providers, working group
• **Year 1:** Review demand, supply and financial pressures and develop a recovery plan. • **Year 2:** Implement agreed actions to improve sustainability and system flow. • **Year 3:** Evaluate progress and refresh the plan to respond to changing demand.			
Deliver a temporary accommodation acquisitions strategy to increase supply, improve quality and support long-term sustainability of provision.	Households with children in temporary accommodation Households with children in B&B over six weeks	Increases availability of suitable accommodation and reduces reliance on costly emergency placements and B&B use.	Brighton & Hove Housing, Brighton & Hove Procurement, Property Services, accommodation providers, Registered Providers, working group
• **Year 1:** Identify acquisition opportunities and agree delivery priorities. • **Year 2:** Increase supply through acquisitions and partnership opportunities. • **Year 3:** Consolidate and evaluate impact on quality, availability and cost effectiveness.			
Develop and publish contractual quality standards for interim and temporary accommodation.	Households with children in temporary accommodation Households with children in B&B over six weeks	Improves quality, consistency and suitability of temporary accommodation provision for households.	Brighton & Hove Housing, Brighton & Hove Procurement, accommodation providers, Brighton & Hove Public Health, working group
• **Year 1:** Co-produce quality standards with residents, providers and partners which will be included in a Temporary Accommodation Charter. • **Year 2:** Implement standards through procurement and contract management arrangements. • **Year 3:** Ongoing compliance monitoring through quarterly performance reviews and continuously improve standards based on learning and feedback.			

Strengthen temporary accommodation supply through partnership working with private landlords, Registered Providers and the voluntary, community and social enterprise sector.	Households with children in temporary accommodation Households with children in B&B over six weeks Success at preventing and relieving homelessness (%)	Expands access to accommodation options, reduces placement pressures and creates additional pathways into settled housing.	Brighton & Hove Housing, Registered Providers, private landlords, Community Works, VCSE organisations, working group
• **Year 1:** Using data, identify key opportunities to increase accommodation supply across Brighton & Hove aligned with the commitment to move suitable households back into the city who are currently living in 'out of area' accommodation. • **Year 2:** Develop and implement partnership initiatives to expand provision. • **Year 3:** Continue to review provision and how this sits alongside other accommodation provision to ensure that people experiencing homelessness move from temporary accommodation to settled accommodation options in a supported way.			

Priority 3: Improve joined-up support with partners for people who most need help

We will strengthen collaboration across housing, health, social care, criminal justice, voluntary sector and community services to provide more integrated support for people experiencing homelessness and multiple disadvantage. Through shared planning, improved coordination, and a greater focus on partnership delivery, we will ensure residents receive support that reflects their individual circumstances and needs.

We will work alongside people with lived experience and partner organisations to address inequalities, improve access to services and develop more effective responses for those facing the greatest barriers to housing stability and recovery. We will develop support pathways that follow the individual across services, creating a more coordinated and less fragmented journey, reducing the need for people to repeatedly recount their experiences, and promoting trauma-informed, person-centred support.

How we will measure progress:

- Households with accommodation secured at end of prevention/relief duty for households also experiencing at least two areas of overlapping disadvantage

- Number of households unable to be supported at domestic abuse safe accommodations due to being unable to meet additional needs.
- % of people with multiple compound needs achieving positive outcomes across at least 3 domains (housing, health, criminal justice, substance use) at 12 months
- Number of people sleeping rough over the month who are long term

Local Outcome Framework Target(s):

- Success at preventing and relieving homelessness (%)
- Success at preventing and relieving homelessness for those experiencing multiple disadvantage (%)
- People sleeping rough who are long-term
- Households with children in temporary accommodation
- People sleeping rough on a single night

Action	LOF Target(s) Supported	How the Action Contributes	Key Agencies
3.1 Target support for people who are most vulnerable			
Develop and implement multi-agency pathways and protocols for priority groups at increased risk of homelessness.	Success at preventing and relieving homelessness (%) Success at preventing and relieving homelessness for those experiencing multiple disadvantage (%)	Improves coordination between services, enabling earlier support and reducing the likelihood of homelessness amongst vulnerable groups.	Brighton & Hove Housing, Brighton & Hove Children's Services, Adult Social Care, NHS Sussex, Domestic Abuse Services, Refugee and Migrant Services, VCSE partners, working group
• **Year 1:** Review existing pathways and identify gaps for priority groups. • **Year 2:** Develop and implement agreed pathways and protocols. • **Year 3:** Embed and evaluate effectiveness in improving outcomes.			
Develop a Supported Housing Strategy and prepare for implementation of new	Success at preventing and relieving homelessness for those experiencing multiple disadvantage (%)	Improves access to quality supported accommodation and strengthens pathways for residents with ongoing support needs.	Brighton & Hove Housing, Supported housing providers, Adult Social Care, NHS Sussex,

supported housing standards.	People sleeping rough who are long-term		Registered Providers, working group
• **Year 1:** Develop the Supported Housing Strategy and assess readiness for new requirements. • **Year 2:** Begin implementation and support providers to prepare for changes. • **Year 3:** Embed the strategy and monitor compliance and outcomes.			
Improve housing options and accommodation pathways for survivors of domestic abuse.	Success at preventing and relieving homelessness (%) Households with children in temporary accommodation	Provides safer housing solutions and reduces homelessness resulting from domestic abuse.	Brighton & Hove Housing, Safe in Sussex, Domestic Abuse Services, Children's Services, Registered Providers, working group
• **Year 1:** Review current pathways and identify opportunities for improvement working with organisations supporting people with lived and living experience. • **Year 2:** Strengthen accommodation options and support arrangements in collaboration with organisations supporting people with lived and living experience . • **Year 3:** Continue to improvements and evaluate impact on housing outcomes and improved outcomes for domestic abuse survivors.			
Work with partners to reduce health inequalities experienced by people at risk of or experiencing homelessness.	Success at preventing and relieving homelessness for those experiencing multiple disadvantage (%) People sleeping rough who are long-term	Improves access to healthcare and support, helping people sustain accommodation and address barriers contributing to repeated homelessness.	Brighton & Hove Public Health, NHS Sussex, Brighton & Hove Housing, Sussex Partnership NHS Foundation Trust, VCSE providers, working group
• **Year 1:** Identify priority health inequalities and opportunities for joint action. • **Year 2:** Deliver targeted partnership initiatives to improve access and outcomes. • **Year 3:** Evaluate impact and embed successful approaches.			
3.2 Create integrated services for people with multiple compound needs			
Establish and embed the Homelessness and Multiple Compound Needs Partnership to improve coordination between	Success at preventing and relieving homelessness for those experiencing multiple disadvantage (%)	Improves coordination around individuals with complex needs, helping prevent homelessness and support sustained recovery from rough sleeping.	Brighton & Hove Housing, NHS Sussex, Sussex Partnership NHS Foundation Trust, Adult Social Care, VCSE sector, working group

housing, health and support services.	People sleeping rough on a single night People sleeping rough who are long-term		
• **Year 1:** Establish governance arrangements and agree priorities. • **Year 2:** Implement coordinated approaches to service delivery and information sharing. • **Year 3:** Embed partnership working and evaluate outcomes.			
Embed co-production with people with lived experience in the design, commissioning and review of homelessness services.	Success at preventing and relieving homelessness for those experiencing multiple disadvantage (%)	Ensures services are better tailored to need, supporting improved engagement and outcomes.	Individuals with lived experience, Common Ambition, Brighton & Hove Housing, VCSE organisations, commissioned providers, working group
• **Year 1:** Review existing co-production arrangements and identify opportunities for expansion. • **Year 2:** Embed lived experience across service design, commissioning and review processes. • **Year 3:** Demonstrate impact and strengthen participation opportunities.			
Develop and implement a joint protocol for people experiencing co-occurring mental health and substance use needs.	Success at preventing and relieving homelessness for those experiencing multiple disadvantage (%) People sleeping rough who are long-term	Improves access to coordinated care and reduces barriers that contribute to recurrent homelessness and rough sleeping.	NHS Sussex, Brighton & Hove Housing, Sussex Partnership NHS Foundation Trust, Change Grow Live, Brighton & Hove Adult Social Care, working group
• **Year 1:** Develop a shared protocol with key partners. • **Year 2:** Implement the protocol and provide workforce development. • **Year 3:** Review effectiveness and refine pathways as needed.			
Work collaboratively to develop an integrated homeless healthcare hub model.	Success at preventing and relieving homelessness for those experiencing multiple disadvantage (%) People sleeping rough who are long-term	Improves access to healthcare for people experiencing homelessness and supports earlier and more effective interventions.	NHS Sussex, Brighton & Hove Housing, Brighton & Hove Public Health, VCSE providers, healthcare partners, working group

• **Year 1:** Develop the model and assess delivery options. • **Year 2:** Pilot or implement the healthcare hub approach. • **Year 3:** Evaluate outcomes and agree future expansion or sustainability arrangements.			
3.3 Support people experiencing rough sleeping to access			
Review and recommission Housing First provision to improve housing and support outcomes for people with complex needs.	People sleeping rough who are long-term People sleeping rough on a single night Success at preventing and relieving homelessness for those experiencing multiple disadvantage (%)	Provides stable housing and intensive support for people with the most complex needs, reducing repeat and entrenched rough sleeping.	Brighton & Hove Housing, Registered Providers, commissioned support providers, NHS Sussex, Adult Social Care, working group
• **Year 1:** Review existing provision and undertake recommissioning activity. • **Year 2:** Implement the revised Housing First model. • **Year 3:** Evaluate outcomes and identify future development opportunities.			
Enhance support for people returning to rough sleeping, including use of data and targeted prevention approaches.	People sleeping rough on a single night People sleeping rough who are long-term	Enables earlier intervention for people at risk of repeat rough sleeping and supports sustained exits from the street.	Brighton & Hove Housing, Outreach services, commissioned homelessness providers, health partners, working group
• **Year 1:** Improve understanding of repeat rough sleeping and associated risks. • **Year 2:** Introduce targeted interventions and prevention approaches. • **Year 3:** Embed data-led prevention activity and review effectiveness.			
Review and redesign day centre provision to meet a wider range of needs and improve sustainability.	People sleeping rough on a single night People sleeping rough who are long-term	Strengthens access to support, advice and engagement services for people experiencing homelessness and rough sleeping.	Brighton & Hove Housing, Day centres, VCSE sector, Public Health, NHS Sussex, working group
• **Year 1:** Undertake a review of current provision and future need. • **Year 2:** Implement redesigned provision and strengthen partnerships. • **Year 3:** Evaluate delivery model and make further improvements where required.			

Develop and enhance housing and support offers for people experiencing long-term rough sleeping.	People sleeping rough who are long-term People sleeping rough on a single night	Provides targeted accommodation and support pathways for those with the most entrenched experiences of rough sleeping.	Brighton & Hove Housing, Registered Providers, Adult Social Care, NHS Sussex, commissioned providers, working group
• **Year 1:** Review existing accommodation and support offers. • **Year 2:** Develop enhanced pathways and targeted support. • **Year 3:** Embed and monitor effectiveness in reducing long-term rough sleeping.			
Pilot a multidisciplinary in-reach support model to inform the future supported housing pathway.	People sleeping rough who are long-term Success at preventing and relieving homelessness for those experiencing multiple disadvantage (%)	Improves engagement with residents in supported housing, prevents tenancy breakdown and supports successful move-on and recovery.	Brighton & Hove Housing NHS Sussex, Adult Social Care, support providers, VCSE organisations, working group
• **Year 1:** Design and establish the pilot model. • **Year 2:** Deliver the pilot and gather evidence of impact. • **Year 3:** Evaluate findings and incorporate learning into future supported housing pathways.			

Chapter: Tackle homelessness in children, families and young people

The needs of children, families and young people will be centred and embedded across delivery of all Strategy priorities. Partners will work together to promote early intervention, improve stability and reduce the impact of homelessness on children's and young people's wellbeing, education and development, including pilots supporting families in temporary accommodation. Through coordinated support and a focus on positive long-term outcomes, we will seek to ensure that children, young people and families receive the support they need to access and sustain safe and suitable housing.

How we will measure progress:

- Number of 16–24-year-olds owed a relief duty
- Number of households with children in temporary accommodation

- Number of children (0-17) in temporary accommodation
- Number of families in B&B over 6 weeks
- % of care leavers in suitable accommodation
- Number of people sleeping rough under 25 and care leaver

Local Outcome Framework Target(s):

- Success at preventing and relieving homelessness (%)
- Success at preventing and relieving homelessness for those experiencing multiple disadvantage (%)
- Households with children in temporary accommodation
- Households with children in B&B over six weeks
- People sleeping rough on a single night

Action	LOF Target(s) Supported	How the Action Contributes	Key Agencies
Priority 1: Increase our effectiveness in preventing homelessness and rough sleeping			
Increase early identification of children, families and young people at risk of homelessness through Family Hubs, schools, Early Help and other universal services.	Success at preventing and relieving homelessness (%) Households with children in temporary accommodation	Earlier identification creates opportunities for intervention before homelessness occurs and reduces future demand for temporary accommodation.	Brighton & Hove Housing, Schools, Family Hubs, Early Help, Health Visitors, Youth Services, VCSE organisations, working group
• **Year 1:** Review existing identification and referral pathways and strengthen awareness of housing risk indicators across universal services. • **Year 2:** Implement enhanced referral pathways and training to support earlier identification and intervention. • **Year 3:** Embed homelessness prevention within routine practice across partner services and evaluate impact on early intervention outcomes.			
Improve the collection, sharing and use of data to better understand need,	Success at preventing and relieving homelessness (%)	Supports evidence-based targeting of prevention activity and	Brighton & Hove Housing, Families, Children & Learning, Public Health, NHS Sussex,

target support and evaluate outcomes.	Success at preventing and relieving homelessness for those experiencing multiple disadvantage (%)	improves understanding of vulnerable cohorts.	schools, VCSE organisations, working group
• **Year 1:** Review available data sources and develop a framework for improving intelligence and performance monitoring. • **Year 2:** Pilot enhanced data-sharing arrangements and use findings to target prevention activity. • **Year 3:** Embed data-informed partnership planning and use outcome data to refine interventions and resource allocation.			
Develop a family intervention and mediation offer for young people at risk of homelessness.	Success at preventing and relieving homelessness (%) Success at preventing and relieving homelessness for those experiencing multiple disadvantage (%)	Prevents family breakdown leading to homelessness and supports young people to remain safely within family networks where appropriate.	Brighton & Hove Housing, Youth Services, Housing Services, VCSE organisations, working group
• **Year 1:** Review existing family support and mediation provision and identify gaps. • **Year 2:** Develop and implement a coordinated family intervention and mediation offer. • **Year 3:** Embed the offer and evaluate its effectiveness in preventing family breakdown and homelessness.			
Deliver targeted prevention for young people at risk of rough sleeping, including emergency accommodation, outreach, advice and advocacy.	Success at preventing and relieving homelessness for those experiencing multiple disadvantage (%) People sleeping rough on a single night	Provides early support and accommodation options for young people at risk of sleeping rough.	Brighton & Hove Housing, Youth Services, YMCA DownsLink Group, outreach providers, Children's Services, VCSE organisations, working group
• **Year 1:** Review existing support pathways and identify young people most at risk of rough sleeping. • **Year 2:** Strengthen targeted prevention, outreach and accommodation responses for identified cohorts. • **Year 3:** Embed effective approaches and evaluate impact on youth rough sleeping prevention.			
Priority 2: Improve temporary accommodation pathways and experiences			
Support children, families and young people living in temporary	Households with children in temporary accommodation	Reduces the negative impact of temporary accommodation and	Brighton & Hove Housing, Schools, NHS Sussex, Family Hubs, Children's Services, VCSE

accommodation to maintain access to education, healthcare, support networks and community connections.		supports stability while households await settled housing.	organisations, higher education, working group
• **Year 1:** Review barriers to accessing key services and identify opportunities to improve support. • **Year 2:** Implement coordinated arrangements with partner agencies to reduce disruption and improve access. • **Year 3:** Embed partnership approaches and monitor impacts on family wellbeing and stability.			
Improve standards and outcomes for children and families living in temporary accommodation.	Households with children in temporary accommodation Households with children in B&B over six weeks	Improves the suitability and quality of accommodation used for families with children.	Brighton & Hove Housing, Temporary accommodation providers, Brighton & Hove Public Health, Brighton & Hove Children's Services, VCSE organisations, working group
• **Year 1:** Assess current experiences and identify opportunities to improve quality and outcomes. • **Year 2:** Implement service improvements and strengthen monitoring of family outcomes. • **Year 3:** Embed quality improvements and use feedback to drive continuous improvement.			
Minimise the use of B&B, non-self-contained accommodation and out-of-area placements for families with children.	Households with children in B&B over six weeks Households with children in temporary accommodation	Reduces reliance on unsuitable accommodation and improves outcomes for families.	Brighton & Hove Housing, Accommodation providers, Registered Providers, working group
• **Year 1:** Review current use of accommodation types and identify opportunities to reduce reliance on unsuitable placements. • **Year 2:** Implement actions to increase suitable accommodation options and reduce use of B&B and out-of-area placements. • **Year 3:** Sustain reductions and monitor outcomes for families and children.			
Support families with children and young people to move from temporary accommodation into secure and settled housing.	Households with children in temporary accommodation Households with children in B&B over six weeks	Increases move-on into settled housing and reduces time spent in temporary accommodation.	Brighton & Hove Housing, Registered Providers, support providers, DWP/Jobcentre Plus, VCSE organisations, working group
• **Year 1:** Review barriers to move-on and identify priority actions to improve housing pathways. • **Year 2:** Strengthen move-on support and partnership working to increase access to settled accommodation.			

• **Year 3:** Embed effective move-on pathways and evaluate impacts on length of stay in temporary accommodation.			
Develop tailored accommodation and support pathways for vulnerable young people.	Success at preventing and relieving homelessness for those experiencing multiple disadvantage (%) People sleeping rough on a single night	Ensures vulnerable young people receive accommodation and support suited to their needs and circumstances.	Brighton & Hove Housing, Brighton & Hove Care Leaver Service, Youth Services, supported housing providers, VCSE organisations, working group
• **Year 1:** Review current provision and assess gaps in accommodation and support pathways. • **Year 2:** Develop and implement tailored pathways for vulnerable young people. • **Year 3:** Embed pathways and evaluate housing stability and support outcomes.			
Priority 3: Improve joined-up support with our partners for people who most need help			
Ensure children, families and young people experiencing homelessness receive coordinated multi-agency protection and support.	Success at preventing and relieving homelessness (%) Success at preventing and relieving homelessness for those experiencing multiple disadvantage (%)	Improves service coordination and ensures needs are identified and addressed at the earliest opportunity.	Brighton & Hove Housing, NHS Sussex, schools, Early Help, VCSE organisations, working group
• **Year 1:** Review existing multi-agency arrangements and identify opportunities for improved coordination. • **Year 2:** Implement strengthened partnership protocols and information-sharing arrangements. • **Year 3:** Embed coordinated multi-agency practice and evaluate impacts on outcomes for children and families.			
Support care experienced young people and other vulnerable young people to sustain accommodation and tenancies.	Success at preventing and relieving homelessness for those experiencing multiple disadvantage (%) People sleeping rough on a single night	Reduces tenancy breakdown and homelessness amongst young people leaving care and other vulnerable groups.	Brighton & Hove Housing, Brighton & Hove Care Leaver Service, Housing Services, supported housing providers, VCSE organisations, working group
• **Year 1:** Review existing support arrangements and identify risks to tenancy sustainment. • **Year 2:** Strengthen tenancy support and transition planning for vulnerable young people. • **Year 3:** Embed preventative support and evaluate impacts on tenancy sustainment and homelessness prevention.			

Strengthen support for vulnerable children and young people through a multi-agency 'Team Around Me' approach.	Success at preventing and relieving homelessness for those experiencing multiple disadvantage (%)	Provides coordinated support to address multiple and interconnected needs that increase vulnerability to homelessness.	Brighton & Hove Housing, NHS Sussex, schools, Youth Services, VCSE organisations, businesses, working group
• **Year 1:** Establish a shared model and agree priority cohorts and referral arrangements. • **Year 2:** Implement and expand the Team Around Me approach across partner agencies. • **Year 3:** Embed collaborative working and evaluate outcomes for children and young people with multiple needs.			

Delivery of the Homelessness and Rough Sleeping Action Plan is a partnership responsibility, with actions being taken forward collectively by organisations across housing, health, social care, criminal justice, education, and the voluntary, community and social enterprise sectors. The Action Plan reflects a shared commitment to delivering the priorities and outcomes set out in the Homelessness and Rough Sleeping Strategy.

The Homelessness and Rough Sleeping Working Group is responsible for overseeing delivery of the Action Plan on behalf of the partnership. This includes coordinating activity across partner organisations, monitoring progress against actions and outcomes, identifying risks and barriers, and ensuring that delivery remains aligned with the strategic priorities of the Strategy. The Chair of the Working Group coordinates monthly meetings and escalates to the Director and Corporate Director of Housing People Services alongside any actions required by the Partnership Board on occasions where mitigations are not proving to be successful and risks remain.

8.2 Local partnership work to reduce homelessness for particular groups, including people leaving public institutions

Groups	Joint Working Approaches
Prisons and Probation	Strengthen multi-agency working between housing, probation, prisons, residential rehabilitation services, supported accommodation providers and homelessness services to identify risk early, coordinate pre-release planning, provide targeted accommodation and support where needed, and improve housing outcomes following release.

Young People Leaving Care	Corporate Parenting responsibilities supported through the Care Leavers Housing Protocol, Local Offer for Care Leavers and joint working between Housing and Children's Services. Strengthen the housing and tenancy sustainment pathway for care-experienced young people, ensuring they are actively involved in planning for their move and that suitable accommodation and support needs are identified before leaving care. All care-experienced young people moving into general needs council housing will be offered proactive tenancy sustainment support to help them settle successfully.
Hospital and Health	Partnership working between housing services, NHS partners, homeless healthcare services, hospital discharge teams, mental health services, treatment providers, residential rehabilitation services, public health and supported accommodation/housing services. This will help to identify housing needs early, prevent discharge into homelessness or rough sleeping, secure appropriate accommodation, and ensure individuals receive the support needed to sustain recovery, maintain wellbeing, and prevent homelessness.
Asylum	Partnership working with specialist refugee and migration organisations to provide targeted advice, support and prevention interventions.
Veterans	There is no dedicated veterans' pathway due to the relatively low number of veterans accessing the service. Veterans are supported through the standard homelessness pathway, with individual circumstances and any specific support needs related to their veteran status identified and considered as part of assessment and support planning. This is something that we will be reviewing.

Delivery of these pathways is supported by a range of accommodation and support services, including supported housing, residential rehabilitation and specialist homelessness provision.

8.3 Role of Lived Experience:

The Homelessness and Rough Sleeping Strategy was developed through collaboration and co-creation with people with lived experience of homelessness and rough sleeping, helping to shape the priorities and commitments set out within the Strategy. As delivery progresses, this lived experience will continue as a vital thread informing service improvement and detailed delivery plans that are agile and iterative. This will help ensure that partnership activity remains focused on improving both outcomes and experiences for residents accessing homelessness and rough sleeping services.

The value of lived experience is already reflected in delivery activity. Individuals with lived experience helped shape the Ask and Act pilot guidance and supporting leaflets and provided feedback that led to refinements to the pilot approach for early intervention and prevention. Lived and living experience is highly valued expertise which ensures approaches are accessible, relevant and responsive to the needs of those they are intended to support. This approach will continue throughout all workstreams committed to delivering against the Action Plan and builds on the lived and living experience which informed the Homelessness and Rough Sleeping Strategy 2025-2030 for Brighton & Hove.

The Partnership Board includes people with lived experience, strengthening governance and ensuring that strategic oversight is informed by those with direct experience of homelessness and rough sleeping.

9. Risks and Dependencies

9.1 Risks

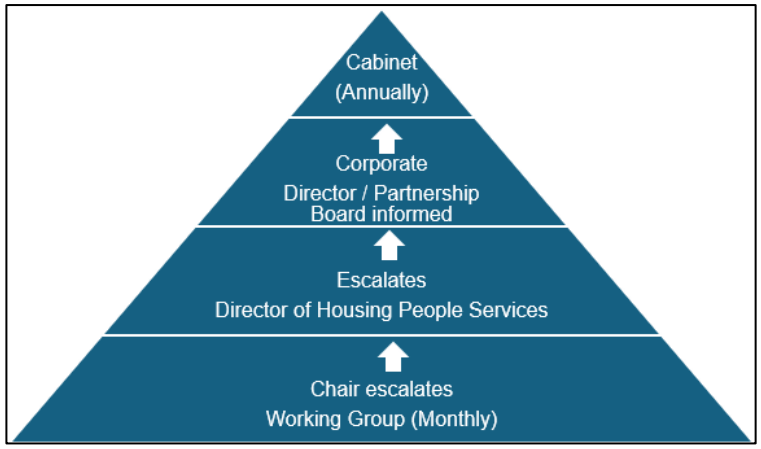
Delivery of the Action Plan may be impacted by a range of factors, including financial pressures, changes in national policy and legislation, increasing demand for homelessness and housing support services, and wider economic conditions affecting housing affordability and access to accommodation. Progress also relies on effective partnership working across multiple agencies, the availability of appropriate staffing and resources, and the ability to respond to emerging local needs and priorities. Risks will be monitored through existing governance arrangements, with mitigating actions identified where delivery issues arise.

The Working Group will be responsible for identifying, monitoring and managing risks to delivery, escalating significant issues where required through the agreed governance arrangements. Mitigating actions will be identified and progress monitored where delivery issues arise.

Risk	Category	Mitigation	Owner
Increased demand for homeless services exceeding available capacity, reducing ability to deliver action plan objectives	Operational	Regular demand forecasting; review of service models; prioritisation of prevention activity; monitoring of pressures through performance reporting	Working Group
Rising complexity of needs among people experiencing homelessness, including mental health, substance use and multiple disadvantage, limits effectiveness of interventions	Operational	Develop integrated pathways; strengthening of partnership working; promotion of trauma-informed approaches; targeted support for complex cases	Working Group
Data sharing and information governance challenges preventing effective partnership working and coordinated interventions	Operational	Data-sharing agreements; staff training; regular review of information-sharing processes	Working Group
Insufficient temporary accommodation supported housing and move-on accommodation available to meet demand.	Operational	Improve supply and access to private rented sector options; develop accommodation pathways; strengthen move-on arrangements; maximise use of available stock.	Working Group
Key partners are unable to commit sufficient resources or engagement to deliver agreed actions.	Operational	Clear accountability and reporting arrangements; regular partnership meetings; escalation through governance structures where delivery issues arise.	Working Group Partnership Board

9.2 Escalation and Reporting

The Homelessness and Rough Sleeping Working Group, who meet monthly, is responsible for coordinating delivery, monitoring progress, and identifying risks and barriers to delivery. Where issues cannot be resolved at Working Group level, the Chair will escalate these in the first instance to the Director of Housing People Services, who will escalate to the Corporate Director, Homes and Adult Social Care, and inform the Partnership Board. Progress against the Action Plan and Strategy outcomes will be reported annually to Brighton & Hove City Council Cabinet.



Escalation and Reporting Diagram

9.3 Dependencies

Delivery of some actions is dependent on the availability of suitable accommodation, support services, funding, and wider system capacity. These dependencies are recognised within the relevant programmes of work, which will seek to maximise available resources, develop capacity, and respond to changes in demand and supply.

10. Vulnerable Groups, Stakeholders and Lived Experience

The Homelessness and Rough Sleeping Strategy recognises that homelessness does not affect all residents equally. Some groups are disproportionately represented amongst people experiencing homelessness, rough sleeping and temporary accommodation, while others may face additional barriers to accessing support or experience forms of homelessness that are less visible within statutory services and data.

Understanding these experiences is essential to delivering the Strategy's commitment to be fair and inclusive. The council and its partners will continue to use evidence, engagement and lived experience to improve services, address inequalities and ensure that support is accessible and responsive to the needs of Brighton & Hove's diverse communities.

10.1 Priority groups and areas of focus

Children, families and young people

Children and young people are significantly overrepresented amongst the city's homeless population. The Strategy includes a dedicated chapter focused on children, families and young people, recognising the long-term impact homelessness can have on health, education, wellbeing and future life opportunities.

Key areas of focus include:

- reducing family homelessness;
- reducing the number of households with children in temporary accommodation;
- eliminating the use of bed and breakfast accommodation beyond statutory limits;
- improving outcomes for care leavers;
- strengthening support for young people at risk of homelessness.

People experiencing multiple compound needs

Many people experiencing homelessness face a combination of challenges, including poor physical or mental health, substance use, domestic abuse, trauma, social exclusion and contact with the criminal justice system. The Strategy supports partnership approaches through the Health and Wellbeing Board, Multiple Compound Needs Transformation Programme, Multiple Compound Needs Strategic Sponsors Group (Sussex) and integrated housing, health and care pathways.

Key areas of focus include:

- coordinated multidisciplinary support;
- trauma-informed approaches;
- reducing repeat homelessness;
- reducing long-term rough sleeping;
- improving housing, health and wellbeing outcomes.

People experiencing rough sleeping

People experiencing rough sleeping often experience some of the poorest outcomes across the homelessness system and are disproportionately affected by poor health, social isolation, trauma and multiple disadvantage.

Priority areas include:

- preventing rough sleeping before it becomes entrenched;

- reducing long-term rough sleeping;
- improving access to accommodation and support;
- improving access to healthcare and specialist services;
- strengthening move-on opportunities.

Women experiencing homelessness

Women's experiences of homelessness are often less visible. Women may be more likely to experience hidden homelessness, including sofa surfing, staying in unsafe relationships, temporary arrangements with friends or family, or homelessness linked to domestic abuse.

Evidence from local partners suggests that women can be under-represented within traditional rough sleeping data despite experiencing significant housing insecurity and multiple disadvantage.

The Strategy recognises the importance of:

- improving understanding of hidden homelessness;
- ensuring services are safe, accessible and responsive to women's experiences;
- strengthening links with domestic abuse services;
- embedding trauma-informed approaches across the homelessness system;
- improving understanding of homelessness experienced by women who may not engage with traditional homelessness services.

Refugees, people seeking asylum and migrant communities

The Strategy recognises that refugees and people seeking asylum can face particular housing challenges, including navigating housing systems, accessing advice and support during periods of transition, and overcoming language and cultural barriers.

The Action Plan includes a commitment to provide targeted and culturally appropriate housing advice and homelessness prevention support.

People from Black and Racially Minoritised communities

The Strategy identifies that some Black and Racially Minoritised communities are disproportionately represented within temporary accommodation and may experience barriers to accessing services and support. The council and its partners will continue to improve understanding of these experiences and work to ensure homelessness services are inclusive, equitable and culturally competent.

Disabled people and people with long-term health conditions
People experiencing poor physical health, mental ill health, neurodiversity, learning disabilities or other long-term conditions are disproportionately represented amongst people experiencing homelessness. The Strategy supports stronger integration between housing, health and care services to improve outcomes and reduce barriers to accessing suitable accommodation and support.

LGBTQ+ communities
Evidence gathered through engagement highlighted the importance of ensuring that services are welcoming, inclusive and responsive to LGBTQ+ residents, particularly young people who may be at increased risk of family breakdown and homelessness.

Older people at risk of experiencing homelessness
The Strategy identified the need for further work to better understand the housing and support needs of people aged 55 and over who are experiencing or at risk of homelessness. This will include improving understanding of pathways into homelessness, prevention opportunities and support requirements.

Gypsy, Roma and Traveller communities
Further work is required to better understand homelessness, housing insecurity and accommodation needs experienced by Gypsy, Roma and Traveller communities and to ensure services are accessible and responsive. As a city, Brighton & Hove has a dedicated site for Gypsy, Roma and Traveller communities.

People living in temporary accommodation
The Strategy identifies people living in temporary accommodation as a priority group for further engagement and evidence gathering, particularly households with children. Understanding residents' experiences will help shape future improvements to temporary accommodation pathways, support services and move-on arrangements. Pilots will be undertaken to ensure that lived experience is centred.

10.2 Stakeholders engaged in developing the Strategy
Development of the Strategy was informed by a broad range of stakeholders from across the city.

Key contributors included:

- Housing services;
- Children's Services;
- Adult Social Care;
- Public Health;
- NHS commissioners and healthcare providers;
- the Homelessness and Rough Sleeping Network;
- homelessness and rough sleeping service providers;
- voluntary, community and social enterprise organisations;
- Common Ambition;
- Justlife;
- people with lived experience of homelessness;
- residents and community organisations participating through public consultation;
- Homeless Operational Forum;
- Brighton & Hove Frontline Network;
- Young Homeless Working Group

Formal consultation on the draft Strategy took place between 8 September and 26 October 2025 and generated 154 responses, comprising 132 responses from individual residents and 22 responses from organisations.

10.3 Lived experience and co-production

People with lived experience have played a central role in shaping the Homelessness and Rough Sleeping Strategy and continue to play an important role in delivery of its priorities. Through Common Ambition, Justlife and other engagement activities, people with lived experience contributed evidence to the homelessness review, informed strategic priorities and helped identify opportunities for improving services and pathways.

Common Ambition's work has been influential in strengthening co-production across the homelessness system. Its six-stage Housing Pathway Map has informed understanding of how people experience homelessness services and has contributed to wider service improvement activity, including the Long-Term Rough Sleeping Partnership Plan.

Here for You research which was published through a collaborative partnership between YMCA DownsLink Group, Sussex Nightstop

and the Clock Tower Sanctuary highlighted the obstacles young people experiencing homelessness face. The findings informed the Homelessness and Rough Sleeping Strategy and continue to play an active role in centring young people with lived experience to prevent them from falling through gaps in the system and shape the Action Plan to meet their needs.

The council and its partners are committed to embedding lived experience throughout implementation of the Strategy and Action Plan. This includes continued involvement through Common Ambition and the Young Homeless Working Group, participation in partnership governance arrangements, engagement activities, pilots, service reviews and the co-design of future policies, pathways and services.

Lived experience is not viewed as a one-off consultation exercise but as an ongoing, highly valued partnership that helps ensure services remain person-centred, trauma-informed, effective and responsive to the realities of those experiencing homelessness in Brighton & Hove.

11. Regional Devolution Context

The Sussex & Brighton Strategic Authority (a Mayoral Combined County Authority bringing together East Sussex County Council, West Sussex County Council and Brighton & Hove City Council) was formally established in March 2026, with its inaugural meeting on 15 April 2026. It will take on strategic housing and planning powers, alongside transport, adult skills, employment support, and oversight of the Police & Crime Commissioner and Fire & Rescue Authority functions, ahead of the first mayoral election in May 2028.

Brighton & Hove City Council remains the local housing authority and retains the statutory duties this Action Plan responds to. However, Brighton & Hove City Council will work closely with the Sussex and Brighton Strategic Authority in delivering the council's Homelessness & Rough Sleeping Strategy 2025 – 2030 and support the development of any sub-regional work. This Action Plan's Section 5 partnership arrangements will be revisited once the Authority's own governance and work programme are further defined.

12. Monitoring, Review and Reporting

- Action Plan progress against targets will be reviewed by the Council and partners every 2-4 weeks to ensure performance against annual targets. This will include a review of data, actions, and progress. It will take place in the Working Group meetings.

- Progress against targets will be reported quarterly to the Homelessness and Rough Sleeping Partnership Board by the Chair of the Working Group.
- Cabinet will be updated annually (more frequently where required).
- The Action Plan (published by 1 December 2026) contains annual checkpoints in Autumn of subsequent years. The third and final checkpoint will take place ahead of the end of Parliament.
- All data required for submission to the Ministry of Housing, Communities and Local Government will be submitted in the requested format and by the required dates. It will include alignment with the Rough Sleeping Programme.
- Detailed information on monitoring, review and reporting governance can be found in Section 4 of this Action Plan.

Suitability of Temporary Accommodation Policy

Status: Final

1. Background

1.1 Statutory Accommodation Duties

The council has a legal obligation to provide accommodation for certain households experiencing statutory homelessness and for some social care clients.

1.2 The Housing Market

The housing market in Brighton & Hove has become increasingly expensive for many households, and costs are forecast to continue rising. Price inflation and changes to welfare benefits mean that a growing number of households are unable to afford accommodation within the city.

1.3 Supporting Households to Remain within Brighton & Hove

As a result, affordable temporary accommodation is increasingly difficult to secure within the city boundaries. Brighton & Hove City Council (BHCC) procures accommodation outside the city where it is not reasonably practicable to secure accommodation within the city. Most accommodation secured is typically within, or immediately adjacent to, the broad rental market area. This is defined as the area in which a person could reasonably be expected to live, taking into account access to facilities and services, as defined by the Valuation Office Agency.

The council already places 85% of all applicants within the city and is striving to increase the available housing supply within the city, with the outcome that this number will increase. There are a comparatively small amount of people with a significant set of needs who are likely to be placed outside of the city.

Brighton & Hove City Council is working hard to reduce the number of out-of-area placements for all those without specific

needs to be placed out-of-area. The number of people placed outside Brighton & Hove has been reduced by 50% in an 11-month period and work is ongoing to continue to reduce this number.

In 2026 the number of households in temporary accommodation has been:

Month of 2026	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug
Number of households in temporary accommodation	2,172	2,203	2,200	2,221	2,274	2,292	2,301	2,336
Percentage change from previous month		1%	0%	1%	2%	1%	0%	2%



The factors driving demand for housing in the city include geographical constraints. There is limited housing supply as building is constrained between the South Downs and the sea. The trend in 2026 has been that demand for temporary accommodation has increased and this is expected to continue. This is because the factors driving increasing demand remain in place.

To achieve best value, the council has been moving away from the use of spot-purchased temporary accommodation and increasing procurement of block-booked accommodation at a lower nightly rate as well as increasing its supply of council-controlled accommodation.

1.4 Out of Area Placement Policy

The Supreme Court decision in *Nzolameso v Westminster City Council [2015] UKSC 22* established that where a local authority is unable to accommodate households experiencing homelessness within its own area, it must have a policy setting out how out-of-area placements are allocated. This policy meets that requirement and supports officers in meeting the statutory requirements of the Homelessness (Suitability of Accommodation) (England) Order 2012. In line with the Court of Appeal decision in *Alibkhiet v Brent LBC [2018] EWCA Civ 2742*, distance from the city is assessed by ease of access and travel time rather than in a straight line.

1.5 Replacement of An Allocation of Temporary Accommodation Policy

An Allocation of Temporary Accommodation Policy was first agreed by Housing Committee on 25 September 2015. This Temporary Accommodation Suitability Policy replaces the Allocation of Temporary Accommodation Policy to comply with new requirements introduced by the government's National Plan to End Homelessness (December 2025).

1.6 Alignment to the Homelessness and Rough Sleeping Strategy 2025 to 2030

The Suitability of Temporary Accommodation Policy reflects priorities set out in the Homelessness and Rough Sleeping Strategy 2025 to 2030, adopted by Cabinet on 11 December 2025. It supports delivery of the strategy's second priority, to improve temporary accommodation pathways and experiences, including the commitments to support people living in temporary accommodation, to improve the supply and quality of that accommodation, and to improve move-on into settled housing. It also reflects the strategy's specific focus on tackling homelessness among children, families and young people, who account for around two in five of those experiencing homelessness in the city, most of whom are living in temporary accommodation.

1.7 Alignment to A National Plan to End Homelessness

In December 2025, the government published A National Plan to End Homelessness. The national priorities most relevant to this policy are ending the unlawful use of bed and breakfast accommodation for families, improving the supply and quality of temporary accommodation, and helping more households to remain in or move into a settled home.

1.8 Assessments

It is the legal obligation of the housing authority to make assessments as to suitability based on the individual circumstances of the presenting applicant.

2. Policy

2.1 Interpretation

The Council's preference is to place households within the city wherever suitable accommodation is available. Where this is not practicable at a particular time, including because suitable accommodation is unavailable, the Council will seek, where appropriate, to bring households back into the city as suitable accommodation becomes available. The policy separates households requiring temporary accommodation into three main groups. These three groups are a continuation of the priority groups that were first adopted by Brighton & Hove in January 2015 in its Allocation of Temporary Accommodation Policy. There will be circumstances where it is appropriate to allocate outside these categories, and each case will be considered on its individual merits.

2.2 Priority Groups

Where no suitable accommodation is available in Brighton & Hove, households will be offered accommodation outside of Brighton & Hove, as close to the city as practicable. On occasions when the Council owes a duty to secure accommodation for households with competing needs and there are fewer units of accommodation available than households to whom a duty is owed, an officer from the Placements Team will apply the priority groups in this section to determine which household will be prioritised for accommodation either within the city, or in the districts adjacent to the city.

The placement groupings set out in this policy are intended to support and guide placement decision-making by promoting consistency and transparency. They do not replace the requirement for an individual assessment of circumstances. Each placement decision will be based on a personalised assessment of the household's needs, risks, vulnerabilities and relevant circumstances, with the individual assessment remaining central to determining the suitability of accommodation.

Group A

Where possible, households in this group will be offered accommodation within Brighton & Hove. This group includes households with:

- A child in their final year of Key Stage 4 (generally Year 11) in a city school
- A child with an Education, Health and Care Plan attending school in the city
- A child subject to a Child Protection Plan under BHCC
- A care leaver where BHCC is the corporate parent
- A person providing care under a formal care plan agreed with Social Care
- A person in settled employment within the city where it is evidenced they are required to work at least 3 hours per shift between 11pm to 6am and where relocation would risk job loss. This reflects the definition of nighttime work in regulation 2 of the Working Time Regulations 1998
- A person receiving specialist medical treatment within the city requiring frequent attendance (typically 2–3 times per week)

Group B

Households in Group B are prioritised for accommodation in adjacent districts within the broad rental market area or neighbouring districts within approximately one hour’s travel time by public transport. This group includes households:

- With a child in secondary education in the city or neighbouring local authorities
- With a person requiring specialist medical treatment available only within the city
- With a person receiving secondary mental health services

Group C

All other households experiencing homelessness will be offered temporary accommodation wherever it can be procured, provided it is suitable for their needs. The Council will seek to secure accommodation as close to Brighton & Hove as reasonably practicable.

2.3 Assessment of Cases

A household's individual circumstances will be taken into account when allocating temporary accommodation. This includes:

- Distance from where they were previously living
- Disruption to employment, education or caring arrangements
- Physical access to and around the accommodation, space to mobilise, the accessibility of bathroom and kitchen facilities, and modifications to assist people with needs arising from sensory loss as well as mobility needs
- Access to medical facilities
- Proximity to essential services and amenities
- Where a household may benefit from being out of city (please see section 2.9 for examples where this may be relevant)

When offering interim accommodation to an applicant, a Homelessness Prevention Officer or Placement Officer will record how they considered the suitability of the interim accommodation offered in light of an applicant's individual circumstances, by placing a note on the applicant's housing file.

If information about the essential needs of a household is missing at the point suitable housing must be offered, the Homelessness Prevention Officer or Temporary Accommodation Housing Officer will consider whether the duty to make further inquiries is triggered and, if so, will request the further information that is necessary to determine the accommodation that is suitable for the household.

When an applicant is offered accommodation, they will receive a written notification with essential information about the accommodation offered, including confirmation whether the accommodation is suitable, whether they have the statutory right to request a review of the suitability within 21 days of the offer, the address of the property offered, the rent, the size and floor level, and who to contact if there is a problem.

2.4 Referral Considerations

At the point of referral, officers must consider:

- Distance from the local area
- Access to transport, including cost implications
- Availability of public transport
- Employment circumstances
- Affordability, taking into account the financial resources available to the household and having regard to the matters in the Homelessness (Suitability of Accommodation) Order 1996 and assessing whether they are sufficient to pay for the household's reasonable living expenses, including, but not limited to, rent, council tax, utility bills, essential transport costs and any other essential needs such as those arising from disability, childcare or other costs caused by the accommodation offered
- Children's welfare issues, particularly education, which includes:
    - Availability of school places
    - Special educational needs or EHCPs
    - Whether the child is at a critical stage (e.g. GCSEs or A-levels)
    - Department for Education Guidance on travel to school for children of compulsory school age
- Medical factors
- Any risks associated with late night travel
- Any other relevant circumstances raised by the applicant

2.5 Operational Procedures

Officers must:

- Ensure referrals, groupings and documentation are passed to the relevant teams
- Confirm grouping prior to placement
- Record and communicate any changes in circumstances
- Ensure allocation decisions remain appropriate at the point of placement

2.6 Anticipated Demand for Temporary Accommodation

The Council will maintain an evidence-based understanding of anticipated demand to ensure sufficient and appropriate provision.

This will include:

- Monitoring homelessness presentations, acceptances, and placements
- Analysing household composition and support needs
- Forecasting demand by accommodation type, including:
    - Self-contained accommodation
    - Shared accommodation
    - Bed and Breakfast (for emergency use only)
    - Specialist and supported accommodation
- Assessing seasonal trends and external pressures, including housing market conditions and welfare reforms
- The demand assessment will be informed by the Local Supported Housing Strategy and associated assessments of supported housing need

This intelligence will inform procurement strategies, financial planning, and decisions regarding in-area and out-of-area placements. It will also align with the monitoring and provision required for the Rough Sleeping Programme.

2.7 Rough Sleeping Programme guidance (three-year programme commencing 2026)

Consideration will be given to whether existing commissioned support can be enhanced to meet the needs of people accessing the Programme. Decisions about the most appropriate support and accommodation will be informed by

assessment of individual needs, risks and support requirements, including risk of long-term rough sleeping, using ERSRAT alongside local intelligence, outreach information and professional assessment.

The Programme may provide a range of accommodation options, including shared accommodation, self-contained accommodation, assessment spaces, supported lodgings, settled accommodation and other supported housing. Accommodation provided through the Programme forms part of the Council's rough sleeping pathway and is distinct from accommodation provided solely in discharge of statutory homelessness duties under Part VII of the Housing Act 1996. It is intended to provide targeted accommodation and support as part of a pathway away from rough sleeping and towards settled housing.

In some circumstances, emergency accommodation may be required, including B&B accommodation, hostel or night-shelter provision, warm spaces or sit-up provision. These options are intended as short-term emergency responses where no more suitable alternative is immediately available, with more suitable accommodation identified as soon as practicable.

Accommodation offers will take account of individual circumstances, safety and support needs. The Council will consider whether individuals may be at increased risk of harassment, abuse, exploitation or re-traumatisation in particular settings, whether shared accommodation is appropriate, and whether specialist, self-contained or single-sex accommodation is required.

Particular consideration will be given to the needs of women experiencing rough sleeping, including survivors of domestic abuse or sexual violence, alongside young people, care leavers, LGBT+ people and disabled people, recognising that different accommodation settings may present different risks or support needs.

2.8 Minimising Disruption to Support, Education and Essential Services

The Council will seek to minimise disruption when allocating temporary accommodation, particularly in relation to:

Education

- Maintaining existing school placements, where reasonably practicable

Health

- Maintaining access to medical treatment, particularly where frequent attendance is required, and ensuring equivalent services are available where this is not reasonably practicable

Employment

- Supporting continued access to employment, including for those working anti-social hours, and ensuring equivalent employment is available where this is not reasonably practicable

Care and Support Networks

- Maintaining formal care arrangements and informal support networks, and ensuring alternative arrangements can be made where this is not reasonably practicable
- Where practical to do so, the Council will consider the cultural needs of the applicant [*R (Gebremarium) v City of Westminster* [2009] EWHC 2254 (Admin)]

These considerations form part of the Council's broader duty to assess suitability when making placements.

2.9 Out-of-Area Placements and Section 208 of the Housing Act 1996

Where accommodation cannot reasonably be secured within Brighton & Hove, placements may be made outside the district in accordance with Section 208 of the Housing Act 1996.

The Council will:

- Secure accommodation as near as reasonably practicable to Brighton & Hove, unless it considers there are clear benefits for the household of being accommodated outside of the city.
    - Examples of cases where a household may benefit from an out of city offer could include where the applicant, and/or a member of their household, would be at risk of domestic abuse or other violence in the city and need to be accommodated elsewhere to reduce the risk of further contact with the perpetrator(s), or households which include ex-offenders or a person who has used drugs or alcohol who would benefit from

being accommodated outside the city to help break links with previous contacts which could exert a negative influence.

- Avoid placements that require households to move more often than necessary
- Take into account all relevant suitability factors set out in this policy
- Prioritise placements within the broad rental market area wherever reasonably practicable
- Avoid placements requiring household members to travel long-distance at night

2.10 Placements Outside the Area

Where a placement is made outside Brighton & Hove, the Council will take reasonable steps to minimise disruption and support the household to access relevant services in the area of placement. The household will be provided with information about key local services and who to contact regarding the accommodation. The receiving local authority will be notified within the required timescale and, where appropriate and necessary, relevant information will be shared and liaison undertaken with services involved with the household, including where statutory safeguarding arrangements are in place.

The suitability of the accommodation will continue to be considered in accordance with this policy where the household's circumstances or needs change. Where a household has been placed outside Brighton & Hove, the Council will, where appropriate, consider opportunities for the household to move closer to or back within the city when suitable accommodation becomes available, taking account of the household's individual circumstances and the needs of other households requiring accommodation.

The Temporary Accommodation Placements Team will, before the end of the period of 14 days beginning with the day on which the accommodation is made available to the applicant:

- provide the household with details of who to contact regarding maintenance or repair issues;
- provide information about nearby schools, doctors and other key services;
- notify the receiving local authority;
- provide relevant information regarding the household and any identified support needs;

- liaise with relevant services in the receiving authority's area before placement where a member of the household is subject to statutory safeguarding arrangements; and
- ensure information provided to the household is available in an accessible format, with translation or interpretation where required

2.11 Notification to Health and Education Services

Following Duty to Refer (Children's Wellbeing and Schools Act 2026), the Council will ensure, where a household with children is placed in temporary accommodation, that:

- Appropriate consent is obtained to share information
- Notification is provided to relevant:
    - Education services
    - GP Surgery
    - Health Visitor services (where applicable)

This will:

- Promote continuity of education and healthcare
- Support safeguarding and early intervention
- Be carried out in accordance with data protection legislation and statutory guidance

2.12 Households with Children

The Council has a duty under section 11 of the Children Act 2004 to have regard to the need to safeguard and promote the welfare of children when providing accommodation.

Accordingly, as best practice according to the Ministry of Housing, Communities, and Local Government guidelines, when providing accommodation to a household containing children, the Council will consider the health, safeguarding and support needs, and ensure that there is:

- Adequate space for a cot for each child aged under 2 and promote safer sleeping guidance

- Where a household with a child aged under 2 does not have access to a cot, the Council will provide immediate support to help provide one and promote safer sleeping guidance
- Somewhere to cook and store food
- Space for a washing machine, or access to a launderette nearby
- Adequate space to securely store clothes and other essentials safely away from other households
- Availability of health and education services that are essential to the needs of the household
- The ability for the household to access Wi-Fi, either: by permission from the landlord for them to register with an internet service provider to set up an active line into the accommodation; or by access to cellular network signal in the accommodation for the applicant to use their own private mobile Wi-Fi router with their own mobile data SIM card where possible to do so

2.13 Standard of Accommodation

- All temporary accommodation provided must be suitable within the meaning of section 206 of the Housing Act 1996. In assessing suitability, the Council will have regard to section 210 of the Housing Act 1996 and Chapter 17 of the Homelessness Code of Guidance
- The quality and condition of accommodation will be assessed before it is used
- Accommodation must be free of Category 1 hazards (including damp, mould, excess cold, excess heat, fire safety and electrical safety) assessed under the Housing Health and Safety Rating System, and must meet all applicable health and safety requirements
- Further quality requirements will be applied according to the type of accommodation used, as set out in Chapter 17 of the Homelessness Code of Guidance, these include access to heating, hot water and certain furnishings.
- Where accommodation is found to be unsafe or in disrepair, the Placement Officer or Temporary Accommodation Housing Officer will escalate the matter with the housing provider and require that remedial action is taken to remedy the unfitness, such as instructing that urgent repair works are undertaken. The household will be moved to alternative suitable accommodation where the council is satisfied it is not practicable to undertake repair works with the client in occupation.

2.14 Bed and Breakfast Accommodation

- Bed and breakfast accommodation (accommodation which is not self-contained, as defined in the Homelessness (Suitability of Accommodation) (England) Order 2003, as amended) will be used only as a last resort in an emergency
- Where a household includes a pregnant woman or dependent children, bed and breakfast accommodation is not suitable unless no other accommodation is available and, even then, must not be used for more than six weeks in total
- Where a family is approaching the six-week limit, the Council will take steps to secure alternative suitable accommodation

2.15 Reviews of Suitability and Refusals

- An applicant has the right under section 202 of the Housing Act 1996 to request a review of the suitability of accommodation offered or provided under section 193(2) of the Housing Act 1996. A request must be made within 21 days of being notified of the decision
- An applicant may accept an offer of accommodation and still request a review of its suitability. The Council will advise applicants of their review rights when an offer is made
- Where an applicant refuses an offer of suitable temporary accommodation, the Council will explain the consequences of refusal, which may include the ending of the Council's duty to accommodate
- This statutory review right is in addition to the Council's internal suitability reconsideration arrangements set out in section 2.16
- Accommodation will be reviewed regularly to ensure it remains safe, suitable, and appropriate for the household

2.16 Local Oversight and Suitability Assurance

The Council will undertake the following to maintain oversight to ensure all temporary accommodation remains suitable.

a) Regular Audits

- Periodic inspections to:
    - Confirm occupancy

- Assess property condition and safety

b) Suitability Reconsideration

- Reconsiderations triggered by:
  - Third-party evidence which indicates accommodation may have become unsuitable
  - A change in the household's circumstances

Where a household provides such evidence of a change in circumstances, the following approach will be taken to reconsider the suitability of the accommodation, depending on the circumstances:

b1) Applicants who provide evidence of a change of circumstances within 21 days of a reviewable decision

- Where an applicant has been notified of a decision which has the right to request a review of the suitability of accommodation, and the applicant requests a move within 21 days of notification of the decision, a statutory suitability review will be undertaken by the Reviews Team.

b2) Applicants accommodated by the Placements Team where the evidence is provided after the 21-day deadline

- If the applicant is in accommodation arranged by the Placements Team, the suitability assessment will be undertaken by a Homelessness Prevention Officer.

b3) Applicants accommodated by the Temporary Accommodation Team or Seaside Homes where the evidence is provided after the 21-day deadline

- If the applicant is in accommodation arranged by the Temporary Accommodation Team, the suitability assessment will be undertaken by the Temporary Accommodation Housing Officer who has oversight of the property.

c) Case Recording and Monitoring

- Use of record systems to:
    - Record decisions
    - Monitor changes in need or grouping

c1) If the Homelessness Prevention Officer or Temporary Accommodation Housing Officer decides the accommodation is suitable, they will send the applicant a decision letter setting out their suitability decision and providing details of the applicant's right to request a review within 21 days.

c2) If the Homelessness Prevention Officer or Temporary Accommodation Housing Officer decides the accommodation is unsuitable, they will add a note to the housing file with the reasons for their decision, notify the applicant, and arrange for the household to be provided with suitable alternative accommodation.

d) Multi-Agency Engagement

- Coordination with:
    - Social Care
    - Education providers
    - Private sector housing for enforcement of housing conditions

e) Governance and Quality Assurance

Oversight through:

- Case audits
- Escalation procedures where accommodation is found unsuitable on reconsideration
- Council-level monitoring will include, as appropriate: in-area and out-of-area placements; families with children or a pregnant woman in B&B and the length of those placements; length of stay in temporary accommodation; suitability decisions, reconsiderations and statutory reviews; property-condition concerns and complaints; and provider performance.

- Individual provider performance will be monitored through the quarterly contract management arrangements and the reporting template shown in Appendix A. This provides a structured framework for quarterly contract management and performance monitoring of temporary accommodation providers. It sets out the process for reviewing provider performance, recording key achievements and issues, assessing compliance and service quality, monitoring occupier experience and satisfaction, and tracking improvement actions through to completion. The template includes performance assessment and reporting arrangements, action planning, escalation processes where required, and formal review and sign-off by both the provider and the Council. The KPI framework is intended to support consistent performance monitoring; however, the specific KPIs and targets will be refined and confirmed by the Contract Manager to ensure they are proportionate, measurable, and aligned with the requirements, service standards, and outcomes set out within the individual provider's contract.

2.17 Public Sector Equality Duty

- In applying this policy, the Council will have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations, in accordance with section 149 of the Equality Act 2010
- An Equality Impact Assessment will accompany this policy and will be kept under review, including consideration of how the priority group criteria and out-of-area placements affect people with protected characteristics
- Key information relating to the placement and property is provided in accessible formats and translated or interpreted wherever needed

2.18 Policy Review and Governance

- This policy will be reviewed annually.
- Complaints about the application of this policy may be made through the Council’s corporate complaints procedure.
- Personal information is handled, stored and shared in accordance with data protection legislation (UKGDPR) and the Council’s privacy notice.

Appendix A

QUARTERLY PERFORMANCE ASSESSMENT TEMPLATE

Accommodation Provider	[PROVIDER]
Accommodation Type	[ACCOMMODATION TYPE]
Contract commencement date *NB: the performance assessment period will commence on the first day of contract implementation*	Day / Month / Year
Quarterly Performance Evidence and Report Submitted by [PROVIDER] Holdings	Day / Month / Year Name: Job title: Date:
Quarterly period (3 months) being assessed	Day / Month / Year - Day / Month / Year inclusive
Performance assessment status *To be completed by the assigned contract manager or Head of Service at Brighton and Hove City Council*	☐ Good ☐ Approaching target ☐ Requires improvement ☐ Inadequate ☐ Other Name: Job title: Date: ☐ Reviewed ☐ Approved ☐ Escalated
Previous reports *Brighton and Hove City Council to include links to all previous reports or the folder containing all previous reports submitted by the Provider*	*All quarterly reports are to be included here to support reviews of any changes from previous reports and annual reporting of KPIs which will be published every 12 months for the lifetime of the contract (six years: 2+2+2)* *Where this is the first quarterly performance report, please enter N/A (not applicable) as there will not be any previous reports or evidence to link to in this section*

Purpose of the Quarterly Performance Assessment:

To provide a consistent quarterly assessment of performance by the Provider ([PROVIDER]) against [XX] KPIs.

The KPIs assess performance against:
Quality of delivery, occupier satisfaction, health and safety, environmental performance, and social value.

Date submitted		Review meeting date	

Assessment process

Instructions

- Complete one rating for each KPI using the agreed evidence for the quarter.
- Where 'Other' is selected, state why the standard scale cannot be applied. For example, no data or no relevant delivery.
- Record corrective action for any KPI rated Requires improvement or Inadequate, including an owner and due date.
- Use the overall assessment section to identify recurring issues, improvement priorities, and decisions required.

Performance rating descriptors

Quarterly performance assessment overview

☐ Good ☐ Approaching target ☐ Requires improvement ☐ Inadequate ☐ Other

Rating	Descriptor
Good	Performance is meeting or exceeding the key performance indicators.
Approaching target	Performance is close to meeting the key performance indicators.
Requires improvement	Performance is below the key performance indicators.
Inadequate	Performance is significantly below the key performance indicator.
Other	Performance cannot be described using the four ratings above. For example, where no data is available to make an informed assessment, or when relevant service delivery has not taken place.

Overall rating rule: apply professional judgement across each of the 15 KPIs.

Do not calculate a simple average where a serious health, safety or safeguarding concern would be masked. Record the rationale below.

Notes on quarterly overview assessment:

Month 1

Please list all relevant information below using bullet points

Month 2

Please list all relevant information below using bullet points

Month 3

Please list all relevant information below using bullet points

KPI performance assessment

For each KPI, record the result, supporting evidence, selected rating, and any required action. Targets reflect the attached contract and specification; where a numerical threshold is not expressly fixed, the measure tests evidenced compliance with the stated obligation.

Performance area/KPI	Target / expected standard	Quarterly report (3 x calendar months) and evidence	Rating	Improvement action, owner and due date
1. Allocation response and same-day move-in	**Respond within 60 minutes to allocation requests and facilitate occupation on the day of allocation.** **Evidence:** Allocation logs; booking records; exception log	**<u>Quarterly reporting</u>** **Month 1 report:** **Month 2 report:** **Month 3 report:** **Evidence / source(s):**	☐ Good 98% - 100% ☐ Approaching target 90-97% ☐ Requires improvement 80-89% ☐ Inadequate Below 80% ☐ Other	**Action:** **Owner:** **Due date:** **Status:**
2. Initial occupancy confirmation	**Inspect each room within 7 days of move-in to confirm that it is occupied and identify any issues.** **Evidence:** Inspection records; resident contact notes	**<u>Quarterly reporting</u>** **Month 1 report:** **Month 2 report:** **Month 3 report:**	☐ Good 100% ☐ Approaching target 98%-99% ☐ Requires	**Action:** **Owner:** **Due date:** **Status:**

		Evidence / source(s):	improvement 90%-97% ☐ Inadequate Below 90% ☐ Other	
3. Routine inspections and welfare engagement	**HMOs: weekly. Self-contained accommodation: monthly. Increase frequency where risk or need requires** **Evidence:** Resident engagement system; inspection schedule	**<u>Quarterly reporting</u>** **Month 1 report:** **Month 2 report:** **Month 3 report:** **Evidence / source(s):**	☐ Good 100% ☐ Approaching target 98%-99% ☐ Requires improvement 90%-97% ☐ Inadequate Below 90% ☐ Other	**Action:** **Owner:** **Due date:** **Status:**
4. Repairs completed to priority timescales	**Priority A: make safe within 2 hours and complete within 24 hours. Priority B: within 5 working days. Priority C: within 28 working days.** **Evidence:** Repairs log; completion evidence; overdue report	**<u>Quarterly reporting</u>** **Month 1 report:** **Month 2 report:** **Month 3 report:** **Evidence / source(s):**	☐ Good ☐ Approaching target ☐ Requires improvement ☐ Inadequate ☐ Other	**Action:** **Owner:** **Due date:** **Status:**

			Statutory: must be 100% otherwise not compliant	
5. Void turnaround	**Return rooms to the required standard within 2 working days, except agreed cases including deliberate damage.** **Evidence:** Void tracker; ready-to-let dates; approvals	**<u>Quarterly reporting</u>** **Month 1 report:** **Month 2 report:** **Month 3 report:** **Evidence / source(s):**	☐ Good ☐ Approaching target ☐ Requires improvement ☐ Inadequate ☐ Other Statutory: must be 100% otherwise not compliant	**Action:** **Owner:** **Due date:** **Status:**
6. Complaints handling	**Stage 1 acknowledged within 2 working days and aimed for resolution within 10 working days.** **Stage 2 normally concluded within 20 working days and notified to the Council within 2 working days.** **Evidence:** Complaints register; responses; escalation records	**<u>Quarterly reporting</u>** **Month 1 report:** **Month 2 report:** **Month 3 report:** **Evidence / source(s):**	☐ Good 98%-100% ☐ Approaching target 90%-97% ☐ Requires improvement 80%-89% ☐ Inadequate Below 80% ☐ Other	**Action:** **Owner:** **Due date:** **Status:**

7. Occupier satisfaction and experience	**Report the proportion and themes of occupier feedback indicating levels of satisfaction with accommodation, communication, respect and housing management.** **Evidence:** Qualitative data from occupiers living in [PROVIDER] properties. Survey or feedback returns; complaints and compliments; engagement notes. This may also be undertaken by the Council for assurance purposes	**<u>Quarterly reporting</u>** **Month 1 report:** **Month 2 report:** **Month 3 report:** **Evidence / source(s):**	☐ Good 98%-100% ☐ Approaching target 90%-97% ☐ Requires improvement 80%-89% ☐ Inadequate Below 80% ☐ Other	**Action:** **Owner:** **Due date:** **Status:**
8. Response to occupier concerns	**Demonstrate that concerns, support needs and barriers to sustaining placements are recorded, are acted on promptly, and outcomes are communicated in a clear person-centred and trauma-informed way.** **Evidence:** Case audit;	**<u>Quarterly reporting</u>** **Month 1 report:** **Month 2 report:** **Month 3 report:** **Evidence / source(s):**	☐ Good ☐ Approaching target ☐ Requires improvement ☐ Inadequate ☐ Other	**Action:** **Owner:** **Due date:** **Status:**

	action logs; resident feedback		Required for 100% of cases	
9. Property compliance at occupation and during occupation	**100% of occupied or re-let properties evidenced as habitable, safe and secure, with required gas, electrical, fire, water and appliance checks.** **Evidence:** Certificates; pre-let checklist; property files 100% of properties free from Category 1 hazards, with Category 1 and 2 hazards promptly reported and remediated.	**<u>Quarterly reporting</u>** **Month 1 report:** **Month 2 report:** **Month 3 report:** **Evidence / source(s):**	☐ Good ☐ Approaching target ☐ Requires improvement ☐ Inadequate ☐ Other Statutory: must be 100% otherwise not compliant	**Action:** **Owner:** **Due date:** **Status:**
10. Housing Health and Safety Rating System (HHSRS) and standards of properties	**Property audits; hazard log; remedial evidence that demonstrate the standards of the properties in line with the Housing Health and Safety Rating System (HHSRS)** **Evidence:** Property audits; hazard log; remedial evidence that shows the standards of properties and whether any property falls under Category 1 (serious risks requiring mandatory	**<u>Quarterly reporting</u>** **Month 1 report:** **Month 2 report:** **Month 3 report:** **Evidence / source(s):**	☐ Good ☐ Approaching target ☐ Requires improvement ☐ Inadequate ☐ Other Statutory: must be 100% otherwise not compliant	**Action:** **Owner:** **Due date:** **Status:**

	action by the Council) or Category 2 (lesser risks where action is discretionary).			
11. Fire safety and emergency planning	**Current fire risk assessments and required actions; evacuation information displayed; PEEPs / individual plans in place where required.** **Evidence:** Fire risk assessments; action tracker; PEEPs; audit findings	**<u>Quarterly reporting</u>** **Month 1 report:** **Month 2 report:** **Month 3 report:** **Evidence / source(s):**	☐ Good ☐ Approaching target ☐ Requires improvement ☐ Inadequate ☐ Other Statutory: must be 100% otherwise not compliant	**Action:** **Owner:** **Due date:** **Status:**
12. Safeguarding and serious incident management	**Serious safeguarding or welfare concerns escalated without delay; required records and written notifications completed within contractual timescales.** **Evidence:** Safeguarding log; incident reports; referral and notification records	**<u>Quarterly reporting</u>** **Month 1 report:** **Month 2 report:** **Month 3 report:** **Evidence / source(s):**	☐ Good ☐ Approaching target ☐ Requires improvement ☐ Inadequate ☐ Other Required for 100% of cases	**Action:** **Owner:** **Due date:** **Status:**

13. EPC C or above	**100% of available properties hold EPC C or above by the contractual deadline. Non-compliant properties are declared and removed from availability until compliant.** **Evidence:** EPC register and certificates; works plan; availability list	**<u>Quarterly reporting</u>** **Month 1 report:** **Month 2 report:** **Month 3 report:** **Evidence / source(s):**	☐ Good ☐ Approaching target ☐ Requires improvement ☐ Inadequate ☐ Other Required for 100% of properties made available	**Action:** **Owner:** **Due date:** **Status:**
14. Local employment and skills	**Practical activity supporting local employment, training, skills or workforce development during the quarter.** **Evidence:** Workforce data; training records; local recruitment evidence including for those with lived experience of homelessness	**<u>Quarterly reporting</u>** **Month 1 report:** **Month 2 report:** **Month 3 report:** **Evidence / source(s):**	☐ Good ☐ Approaching target ☐ Requires improvement ☐ Inadequate ☐ Other Required to be evidenced 100% of the time (social value)	**Action:** **Owner:** **Due date:** **Status:**
15. Partnership, innovation and resident outcomes	**Partnership working and appropriate innovation or technology that improves service delivery or**	**<u>Quarterly reporting</u>** **Month 1 report:**	☐ Good ☐ Approaching	**Action:** **Owner:**

	occupier outcomes. **Evidence:** Partnerships ways of working and activity; improvement case studies; outcome evidence	**Month 2 report:** **Month 3 report:** **Evidence / source(s):**	target ☐ Requires improvement ☐ Inadequate ☐ Other Required to be evidenced 100% of the time (social value)	**Due date:** **Status:**

Consolidated improvement and escalation plan

Transfer all actions arising from the KPI assessment into this section. Add rows as required. Immediate risks should be escalated through the relevant contract, health and safety or safeguarding route and should not wait for the next quarterly review.

	Issue / required improvement	Action	Owner	Due date	Status	Evidence of closure
1					☐ Open ☐ Closed	
2					☐ Open ☐ Closed	
3					☐ Open ☐ Closed	
4					☐ Open ☐ Closed	
5					☐ Open ☐ Closed	
6					☐ Open ☐ Closed	
7					☐ Open ☐ Closed	
8					☐ Open ☐ Closed	

Quarterly Performance Assessment Outcome

Agreed overall rating	☐ Good ☐ Approaching target ☐ Requires improvement ☐ Inadequate ☐ Other
Council comments	

Provider comments	
Brighton and Hove City Council representative	Name: _____ Signature: _____ Date: _____
[PROVIDER] Provider representative	Name: _____ Signature: _____ Date: _____

Template source basis

This template was developed from the [PROVIDER] contract and associated documents, particularly the requirements on quarterly reporting, allocations, inspections, repairs, voids, complaints, property compliance, safeguarding, EPC performance and social value.

Working together to end long-term rough sleeping

Brighton & Hove
Long-Term Rough Sleeping Partnership Plan 2026 – 2029

Our plan on a page

Our ambition	Nobody in Brighton & Hove is left experiencing long-term rough sleeping. When rough sleeping does occur, it is rare, brief and not repeated.
Our goal	This plan contributes to the Government's ambition to halve long-term rough sleeping by the end of this Parliament. In Brighton & Hove we will go further, reducing long-term rough sleeping from 24 people per month to 8. We will also reduce the annual rough sleeping count by more than 50%, from 57 to 20 people.
Who we focus on	People who have spent the longest periods experiencing rough sleeping, those who repeatedly return to experiencing rough sleeping, and those facing the greatest risk of harm and exclusion. Together, they form our Target Priority Group. Rough sleeping is the most acute and extreme form of homelessness. It is characterised by someone about to, or actually, bedding down in the open air (such as, on the street, in tents, doorways, parks, bus shelters or encampments) or places not designed for habitation (including cardboard boxes, stairwells, cars and other makeshift and not fit for purpose places). Someone experiencing long-term rough sleeping is defined by the UK Government as a person who has been seen experiencing rough sleeping in the current reporting month and in at least three separate months within the previous 12 months. This measure is used by the Ministry of Housing, Communities and Local Government (MHCLG) to monitor local authority performance, inform national reporting, and allocate funding. Key criteria: • Assessed over a rolling 12-month period. • Rough sleeping must be recorded in three or more separate calendar months; continuous rough sleeping is not required. • The individual must also have been seen rough sleeping within the current reporting month to be counted in local statistics. Why this matters: This definition provides a consistent national measure of persistent rough sleeping, helping local

	authorities identify people facing the greatest barriers to leaving the streets and target support and resources accordingly.
Our shared system	A seven-stage pathway from being at risk of experiencing long-term rough sleeping through to settling in and sustaining a home: at risk, finding support, understanding needs, coordinating support around multiple compound needs, temporary or supported accommodation, finding longer term housing, and sustaining a home.
How we work	One shared understanding of need. This approach will include: • One coordinated plan around the person; • Trusted relationships over time; • Continuity of support; • Housing, health, the criminal justice system, social care and community services working together; • Trauma informed practice; • Lived experience/living experience at the centre; and • Shared responsibility for outcomes.
How we are organised	**Cabinet** members have approved the Homelessness and Rough Sleeping Strategy 2025-2030. The Action Plan which includes this Long-term Rough Sleeping Partnership Plan and a Suitability of Temporary Accommodation Policy are approved by Cabinet. Performance will be reported annually to Cabinet members. The **Homelessness and Rough Sleeping Partnership Board** provides strategic leadership across the pathway, supported by health and care, safeguarding, and criminal justice partnerships. Cabinet members also form part of the Partnership Board alongside two Partnership Board members with lived experience/living experience. Partnership Board members ensure good governance, that progress remains on track against targets and unlock challenges that sit at a system level where collective and collaborative leadership is required. Performance will be reported quarterly to the Partnership Board.

	The **Working Group** is responsible for delivering the actions required to achieve the targets. It reports updates into the Partnership Board quarterly and updates other groups and partners across the city regularly via the Chair of the Working Group. It combines teams from across the Council with partners from across the city to ensure that the targets are on track and that learning is applied in an agile and iterative way. Work undertaken by the Working Group includes collaboration and co-creation with lived experience/living experience. The Working Group meets every four weeks reporting performance against targets and sharing learnings to ensure collaborative working in partnership.
What success looks like	We will have succeeded when long-term rough sleeping in Brighton & Hove has reduced by more than 50% and continues to fall; when fewer people are prevented from experiencing rough sleeping in the first place; when people move more quickly from rough sleeping into accommodation and support; and when fewer people return to experiencing rough sleeping after receiving an offer of accommodation and support. We will know our partnership is making a difference when people leaving prison, hospital, care or asylum accommodation are less likely to experience rough sleeping, when people with the most complex needs receive coordinated support, and when more people are able to sustain a settled home. Beyond the numbers, success is a system where support arrives before crisis, services work together around the person, and nobody has to experience rough sleeping to get help.

1. Our city and our partnership

Brighton & Hove is a vibrant, creative and coastal city that attracts people from across the region and beyond. Its diverse communities, strong voluntary, community and faith sector, universities, visitor economy, and well-established health and support services make it a place of opportunity for many. However, some of the qualities that make the city attractive can also create significant challenges. Demand for housing continues to outstrip supply, affordability remains a major issue, and the city's geography, bounded by the sea and the South Downs, limits opportunities for expansion.

Within this context, people experiencing rough sleeping remains one of the most visible and complex forms of homelessness in the city. People experiencing long-term rough sleeping are often navigating multiple challenges at the same time, including poor physical and mental health, trauma, substance use, social isolation, poverty and contact with the criminal justice system. There is a common perception that rough sleeping only takes place on the street. In reality, experiencing rough sleeping can take many forms and is not always visible, despite being the most acute and extreme forms of homelessness.

People experiencing rough sleeping is characterised by someone about to, or actually, bedding down in the open air, such as on the street, in tents, doorways, parks, bus shelters or encampments, or in places not designed for habitation, including cardboard boxes, stairwells, vehicles and other makeshift locations. The challenges people face rarely exists in isolation and can make it difficult to access, engage with, and sustain support over time.

Addressing long-term rough sleeping therefore requires more than individual interventions. People often need support from housing, outreach, health, mental health services, drug and alcohol treatment, adult social care, criminal justice services, accommodation providers and community organisations at different points in their journey. While many people are in contact with multiple services, support is not always coordinated around the person.

Our partnership brings together organisations from across Brighton & Hove to respond collectively. This includes Brighton & Hove City Council, NHS Sussex, Sussex Partnership NHS Foundation Trust, probation and prison services, Sussex Police, accommodation providers, registered providers, voluntary, community and faith organisations, and people with lived experience/living experience. Together, partners work through a network of arrangements that support prevention, early intervention, coordinated support and long-term system change. This includes the Homelessness and Rough Sleeping Partnership Board, the Homelessness and Rough Sleeping Working Group, the Homelessness and Rough Sleeping Network, the Homelessness Operational Forum, Brighton & Hove Frontline Network, Common Ambition, the Multiple Compound Needs Transformation Programme, the Integrated Care Team, the Mental Health Accommodation Group, the Health and Wellbeing Board, Safeguarding Adults Board, Young Homeless Working Group, Temporary Accommodation Action Group and Refugee and Migrant Forum.

Together, these partnerships provide leadership, challenge, accountability and learning across the system. They enable us to identify risks earlier, intervene more effectively, improve coordination around the people who need us most, and continually learn from data, frontline practice and lived experience.

This plan sets out how we will strengthen collaboration, improve our shared understanding of need and align support around common outcomes. It describes how partners will work together to prevent people becoming trapped in long-term rough sleeping, reduce the time people spend on the streets, and create sustainable routes into housing and recovery.

1.1 What this plan is

This is our Partnership Plan for long-term rough sleeping. It sets out how partners will work together across the system, including our shared approach, governance arrangements, delivery model and collective priorities.

The plan sits alongside the Homelessness and Rough Sleeping Strategy within the Action Plan. The Strategy sets out what we want to achieve. This Partnership Plan describes how we will work together to achieve it for people experiencing long-term rough sleeping. The Action Plan provides the framework for delivery, monitoring and accountability and includes the Local Outcomes Framework Targets, the Suitability of Temporary Accommodation Policy and this Long-Term Rough Sleeping Partnership Plan.

The Strategy's three priorities are preventing homelessness and rough sleeping; improving temporary accommodation pathways and experiences; and improving joined up support for people who most need help. Alongside these sits a dedicated chapter focused on tackling homelessness among children, families and young people. Together, they shape the approach set out in this plan.
Through these priorities and chapter, we will work as one system around the people who need us most, ensuring support is coordinated, person-centred and focused on helping people move away from long-term rough sleeping for good.

2. Our shared ambition

Meets MHCLG section (a): Partnerships, shared vision and outcomes.

Together, we want to end rough sleeping in Brighton & Hove. When someone does experience rough sleeping, it should be rare, brief and never repeated, and nobody should be left on our streets long-term.

For a person in our city, that means someone notices early; there is at least one person they can trust; they tell their story once; they feel safe, heard and valued; there is a safe place to go that leads somewhere; and when they move into a home, support stays with them until they are settled and connected to their community. People with lived experience told us that lasting change comes not just from housing, but from trusted relationships, continuity of support, hope and a sense of belonging.

2.1 Our shared goal

We will reduce long-term rough sleeping in our city by two-thirds, from 24 people a month to 8, in line with - and moving beyond - the national ambition to halve long-term rough sleeping. We will also reduce the number of people experiencing rough sleeping on a single night in autumn from 57 to 20.

Ending Long-term rough sleeping.	Baseline (2025)	2026	2027	2028
Long-term rough sleeping (monthly)	24	23	18	8
Single-night count (autumn)	57	46	32	20
Prevention and relief success for people facing multiple disadvantage	25.16%	38.5%	41%	44%

We expect the biggest change to come later, as new settled homes with intensive support open. In the preceding timeframe, our focus is on building the foundations that make that change last: a shared priority list, one plan around each person, intensive support from winter 2026, and stopping as many new people as possible from experiencing long-term rough sleeping.

2.2 Success criteria

This plan is about the people with the most complex needs, who have slept rough longest. It is judged against three success criteria, each a Local Outcomes Framework (LOF) measure with a local target for every year of the plan.

Code	Success criterion	LOF outcome	Already used locally in	Baseline (2025)	2026	2027	2028	Reported by
M1	Number of people sleeping rough over the month who are long term (headline measure)	3 and 4	Homelessness and Rough Sleeping Strategy 2025–2030, Priority 3 indicator	24	23	18	8	Partnership Board
M2	Number of people sleeping rough on a single night (autumn snapshot)	3	Strategy, Priority 1 indicator	57	46	32	20	Partnership Board
M3	Prevention and relief success for people facing multiple disadvantage	3 and 4	Strategy, Priority 3 indicator	25.16%	38.5%	41%	44%	Homeless and Multiple Compound Needs Partnership

2.3 What the targets mean

- **M1:** halving long-term rough sleeping would mean 12 by the end of this Parliament. A target of 8 by 2028 is a two-thirds reduction, reached sooner.
- **M2:** a single-night count of 20 would be around 7 people per 100,000 residents. That is below the England rate in 2025 (8.2), down from around 20 per 100,000 now, which is roughly two and a half times the England rate.
- **M3:** in 2025, homelessness was prevented or relieved for around one in four households facing multiple disadvantage (25.16%). The target is more than four in ten (44%) by 2028. For comparison, 66% of all prevention duties ended with accommodation secured in 2024, so households facing multiple disadvantages currently do much worse than others.

2.4 Progress measures for the long-term cohort

M1 changes only when more people leave long-term rough sleeping for good than join it. Four progress measures show whether that is happening, so the Working Group can see each month whether the plan is on track before the annual figures move. T1, T2 and T4 come from MHCLG's Rough Sleeping Data Framework, which also produces M1. T3 comes from the shared case-level tracker.

Code	Progress measure	What it shows	Source	Reviewed
T1	People sleeping rough over the month who have recently left an institution, such as prison, hospital or care	Whether prevention at transition points is working (rare)	Rough Sleeping Data Framework, Rough Sleeping Programme	Monthly, Working Group, Rough Sleeping Programme
T2	People who become long term each month (new entrants to the long-term cohort)	Whether fewer people are becoming entrenched (brief)	Rough Sleeping Data Framework / CHAIN, Rough Sleeping Programme	Monthly, Working Group, Rough Sleeping Programme
T3	Target Priority Group members accommodated, and still accommodated at 6 and 12 months	Whether people are leaving the street and staying off it	Case-level tracker, Rough Sleeping Programme	Monthly, Working Group; quarterly, Partnership Board, Rough Sleeping Programme
T4	People returning to rough sleeping	Whether housing and support are holding (non-recurrent)	Rough Sleeping Data Framework, Rough Sleeping Programme	Monthly, Working Group, Rough Sleeping Programme

2.5 Understanding the figures

Two rough sleeping rates are used in this plan, and they measure different things. The single-night count (57 in autumn 2025) equals around 20 people per 100,000 residents, roughly two and a half times the England rate of 8.2. The monthly figure counts everyone seen sleeping rough over a month: 30 per 100,000 in March 2025, against 13.4 in England and 11.5 in the South East, the joint 19th highest rate in England. The Review of Homelessness 2025 cautions that the single-night count is not a reliable guide to trends, so M2 is always reported alongside the monthly rate.

2.6 What the baselines tell us

In March 2025, 29% of people sleeping rough were new and almost a quarter were returning. Need is high: in the Multiple Needs Audit (Q4 2024/25), 704 people experiencing homelessness had two or more other needs, 88% had mental health needs, 77% had substance use needs and 53% had criminal justice involvement. The city had the 7th highest rate of drug misuse deaths in England (12.7 per 100,000, more than double the England rate of 5.2, 2020–22), and one in five people who died from drugs in 2024 had been homeless in the previous year.

2.7 How the target will be met

Long-term rough sleeping falls only when the number of people leaving the cohort into accommodation they keep is greater than the number becoming long term. To move from 24 to 8, sustained exits must exceed new entrants by 1 in 2026, by 5 in 2027 and by 10 in 2028.

Year	Reduction needed	What makes it possible
2026	24 to 23	Target Priority Group, fortnightly case review and transition protocols slow the number becoming long term (T1, T2)
2027	23 to 18	Prison navigator and no first night out reduce new entrants; the lettings quota and private rented package create the first sustained exits; lead worker continuity and step-down support reduce returns (T2, T3, T4)
2028	18 to 8	Housing First expansion and settled housing provide enough homes for around 10 more sustained exits than new entrants (T3)

2.8 What could get in the way

We are realistic about the challenges ahead. Brighton & Hove continues to face a shortage of affordable and settled housing, increasing complexity of need, workforce pressures, recruitment and retention challenges, and funding uncertainty. Partners also recognise that effective information sharing, service integration and system change take time to develop.

Progress will be reviewed regularly through the Homelessness and Rough Sleeping Working Group and Partnership Board, using Local Outcomes Framework measures, pathway data, Target Priority Group reviews and lived experience insight. Where barriers are identified, we will adapt our approach, update our Action Plan and work together to remove them.

2.9 What success will look like

We will have succeeded when long-term rough sleeping in Brighton & Hove has reduced by more than 50% and continues to fall; when fewer people are prevented from experiencing rough sleeping in the first place; when people move more quickly from rough sleeping into accommodation and support; and when fewer people return to experiencing rough sleeping after receiving an offer of accommodation and support.

We will know our partnership is making a difference when people leaving prison, hospital, care or asylum accommodation are less likely to experience rough sleeping, when people with the most complex needs receive coordinated support, and when more people are able to sustain a settled home.

Beyond the numbers, success is a system where support arrives before crisis, services work together around the person, and nobody has to experience rough sleeping to get help.

3. Our Target Priority Group

Meets MHCLG section (b): Agreeing local needs.

Reducing people experiencing long-term rough sleeping requires partners to focus collectively on the people who face the greatest barriers to moving away from rough sleeping. Central to this plan is our Target Priority Group (TPG).

The Target Priority Group (TPG) is a partnership approach that brings together housing, outreach, health, social care, criminal justice, accommodation and voluntary, community and faith sector partners to identify people who have spent the longest periods experiencing rough sleeping, repeatedly return to experiencing rough sleeping, or face the greatest risk of becoming trapped in experiencing rough sleeping. It creates a shared understanding of who requires the highest level of partnership attention and coordinated action.

The purpose of the Target Priority Group (TPG) is not simply to identify people. It is to help partners work differently with people facing the most entrenched forms of rough sleeping. Through the Target Priority Group, partners share intelligence, coordinate support, address barriers and focus collective effort on helping people move forward.

The Target Priority Group helps partners to:

- identify people experiencing the greatest barriers to moving away from experiencing rough sleeping;
- bring together intelligence, evidence and professional insight from across services;
- coordinate support around shared goals and outcomes;
- identify barriers that are preventing progress and agree how partners will respond;
- focus partnership attention, resources and problem-solving where they can have the greatest impact;
- support escalation where system barriers, service thresholds or gaps in provision are preventing progress.

Being identified through the Target Priority Group should lead to meaningful partnership action. While individual organisations will continue to operate within their own duties, policies and eligibility criteria, partners will work together to consider how services, accommodation, support and opportunities can be aligned around people within the group. The expectation is that the system responds collectively to barriers rather than expecting individuals to navigate those barriers alone. Each person within the Target Priority Group will have a regularly reviewed multi-agency case plan, with agreed actions, ownership and oversight through the partnership.

The Target Priority Group is informed through outreach services, enhanced support teams and intelligence from across the partnership. It is reviewed regularly throughout the year to reflect changing circumstances, emerging risks, progress away from rough sleeping and changing support needs. This enables partners to maintain a shared focus on those facing the greatest barriers while responding flexibly as circumstances change.

4. Brighton & Hove: Long-term rough sleeping system

Meets MHCLG section c. Working together - delivering sustainable impacts

People with lived experience/living experience in our city, worked alongside support workers through Brighton & Hove's Common Ambition. Together, they mapped the housing pathway experienced by single adults facing homelessness in Brighton & Hove. That work provided a shared understanding of how people move through local services, where they encounter barriers, and where they are most likely to become stuck. It remains a recognised pathway across the city and an important foundation for this plan.

Through wider engagement with partners, local evidence and people with lived experience/living experience, we built on that housing pathway to develop a broader long-term rough sleeping system. We recognised that people experiencing long-term rough sleeping are often interacting with multiple services and systems at the same time, and that outcomes depend not only on housing, but on how housing, health, social care, substance use, criminal justice, welfare and community services work together.

The result is a shared seven-stage pathway, from being at risk of experiencing long-term rough sleeping through to settling in and sustaining a home. Every partner can identify their role within it, and every stage presents an opportunity to prevent someone from reaching, remaining in or returning to experiencing long-term rough sleeping.

People with lived experience/living experience told us that experiencing long-term rough sleeping is rarely caused by one issue alone. Many described experiences of trauma, poor mental health, substance use, poverty, exclusion, unsafe relationships and repeated transitions between services. Partners highlighted that people do not experience support in the same way, with different groups facing different barriers at different points in the pathway. This reinforces the need for a flexible system that responds to people's needs, rather than expecting people to fit existing services.

Around every stage sits a wider system of housing, outreach, physical and mental health, drug and alcohol treatment, adult social care, justice, employment and welfare support, alongside specialist services for women, young people, care leavers and people experiencing hidden homelessness. This plan focuses not only on the pathway people experience, but on how the whole system aligns around shared priorities, shared accountability and shared outcomes.

5. What we will do together at each stage

The pathway describes the journey people take from being at risk of experiencing long-term rough sleeping through to sustaining a home. At every stage, there are opportunities to prevent rough sleeping, reduce harm, improve coordination between services, and support people to move towards stable housing and recovery.

People do not experience this journey in a linear way. Many people move between different stages over time, interact with multiple services simultaneously, or experience repeated homelessness before finding lasting stability. Partners told us that people often become stuck where support is fragmented; transitions are poorly coordinated, or systems are unable to respond flexibly to changing needs. People with lived and living experience consistently highlighted the importance of trust, continuity and services working together around the person rather than expecting the person to navigate the system alone.

Prevention is not confined to the earliest stages of the pathway. Every point of contact with housing, health, care, criminal justice and support services represents an opportunity to prevent someone experiencing rough sleeping, prevent escalation of harm, and prevent a return to experiencing homelessness.

The Target Priority Group provides an additional focus for partnership action across every stage of the pathway. It helps partners to identify people facing the greatest risk of long-term rough sleeping, coordinate support across organisations, and focus on resources where they can have the greatest impact. However, the responsibilities set out below apply across the wider system and are intended to improve outcomes for everyone at risk of, or experiencing, rough sleeping.

This section sets out 20 priority commitments: the changes that will make the most difference to people experiencing long-term rough sleeping. Wider actions sit in the Homelessness Action Plan. For each stage of the pathway, we describe what is happening in Brighton & Hove today, who plays a part, and what people with lived and living experience told us. A table then sets out, for each commitment:

- **Challenge:** what people experience, or where they get stuck;
- **Barrier:** the specific reason the system creates that problem;
- **What we will do together:** the change partners will make and based on lived/living experience;
- **Who is involved:** the partners who deliver the commitment together. Lead partners, outputs and dates sit in the Action Plan;
- **Intended outcome:** what will be different for people;
- **Measure of success:** the three success criteria (M1 to M3), the supporting Local Outcomes Framework measures (M4 and M5) and the progress measures for the long-term cohort (T1 to T4) the commitment contributes to. Commitments that make measurement possible are marked as enablers;
- **Year and what will be delivered:** the output that shows the commitment is done, and when (Year 1: 2026; Year 2: 2027; Year 3: 2028).
- Each stage links to the strategic priorities of the Homelessness and Rough Sleeping Strategy 2025–2030, supports delivery of the Rough Sleeping Programme, and every commitment is carried into the Action Plan.

5.1. At risk of experiencing long-term rough sleeping

Strategy Priorities 1 and 4 · Rare · Meets MHCLG section (b): agreeing local needs through early identification and prioritisation; and section (f): collaboration with prisons and probation through prevention, resettlement and transition planning.

Many people who experience long-term rough sleeping are known to a range of services before they began to experience rough sleeping. This can include people living in temporary or supported accommodation, leaving prison, hospital, care or asylum accommodation, as well as people experiencing hidden homelessness, sofa surfing or repeated housing instability. The earlier we identify people at risk of experiencing a cycle of long-term rough sleeping, the greater the opportunity to prevent harm and provide coordinated support.

Who plays a part here: Housing Options and homelessness prevention, probation and prison resettlement teams, hospital discharge teams, Children's Services and leaving care, residential treatment providers, asylum accommodation providers and the Refugee and Migrant Forum, supported and temporary accommodation providers, and the Young Homeless Working Group.

Lived experience/living experience: People told us they often felt support only when they had reached a crisis point. Many described experiences of leaving prison, hospital, temporary accommodation or other services without a clear plan, feeling they had to become more visible or more unwell before support was available.

Challenge	Barrier	What we will do together	Who is involved	Intended outcome	Measure of success	Year and what will be delivered
Resources are not focused on the people at greatest risk	No shared, agreed list of people at highest risk of harm and long-term rough sleeping	We commit to creating the Target Priority Group together, based on need, harm and repeat rough sleeping rather than housing status, and review it monthly on a shared case-level tracker	Housing People Services, outreach, Multiple Compound Needs Integrated Community Team, probation, adult social care, Working Group partners	Partners focus on the same people, with one plan each	**M1**; **T3 (section 2)**	Year 1: Target Priority Group agreed and on the tracker by March 2027
People leave prison, hospital, care, residential treatment or asylum accommodation	Duty to Refer referrals arrive late (in some instances), and in those cases there might be	We commit to creating transition protocols with each discharging service, with referral at least 56 days before a known release, discharge or move-on date. Any release or discharge to no	Housing Options, probation and prisons, hospital discharge teams, leaving care, residential treatment providers, asylum	People leave services with somewhere to go	**M2**; **M3**; **T1 (section 2)**	Year 1: protocols agreed. Year 2: in operation, with every

with nowhere to go	no agreed transition protocols or triggers	accommodation is escalated to the Working Group	accommodation providers, Refugee and Migrant Forum			discharge without a plan escalated
People leaving prison lose their home or have nowhere to go	Pre-release planning starts too late, and nobody manages rent or housing benefit during short sentences	Put a prison navigator in place for people in the Target Priority Group, starting planning 12 weeks before release, and agree a tenancy retention protocol for sentences or remand of up to 13 weeks	Probation, prisons, Housing Options, housing providers, Combatting Drugs Partnership	People leaving prison keep or move straight into accommodation and treatment	**M4**; **T1 (section 2)**	Year 1: tenancy retention protocol agreed. Year 2: navigator in post (subject to funding)
People known to services still spend a first night on the street	Same-day accommodation is not guaranteed for people already known to services	Deliver an early intervention prevention offer: using learnings from the Rough Sleeping Programme (strategy action 1.3)	Housing Options, outreach, emergency accommodation providers	Nobody known to services sleeps out for a first night	**M2**; **T2 (section 2)**	Year 1, 2 and 3 – linked to the Rough Sleeping Programme

5.2. Initial support

Strategy Priorities 1 and 3 · Rare and brief · Meets MHCLG section (c): working together to deliver coordinated, person-centred and multi-agency support.

For many people, finding support is the first step away from rough sleeping. In Brighton & Hove, this support is provided through a network of outreach, health, housing and community services that work to engage people wherever they are and help them access the support they need. The Street Outreach Service (SOS) is often the gateway into the wider system, creating opportunities to build trust, understand individual circumstances and connect people with accommodation, healthcare and longer-term support.

Who plays a part here: This is often the widest point of the system. Alongside outreach services and day centres, people may come into contact with peer advocates, health services, specialist support organisations, accommodation providers, community and faith groups, libraries, food projects, police and community safety services, and members of the public reporting concerns through StreetLink. Each provides an opportunity to identify need, offer support and help someone move away from rough sleeping.

Lived experience/living experience: People repeatedly told us they want one trusted person who stays alongside them. They described having to navigate multiple services, repeat their story, and start again when workers changed. Trust and continuity were identified as some of the most important factors in helping people engage with support.

Challenge	Barrier	What we will do together	Who is involved	Intended outcome	Measure of success	Year and what will be delivered
Outreach cannot always offer something people can accept	Offers depend on what is available that night, and few options accept couples or pets	Review every declined (align this with Rough Sleeping Programme delivery approach) to find what would work, and add flexible rooms that accept couples and pets and offer single occupancy	Street Outreach Service, Housing Options, emergency accommodation providers, housing commissioning	People are offered something they can accept, quickly, and fewer become long term	**M2**; **T2 (section 2)**	Year 1: review of declined offers. Year 2: flexible rooms available
People navigate the system alone and start again when workers change	No single trusted worker, and limited advocacy	Give every person in the Target Priority Group one named lead worker from first contact, with access to advocacy or peer support. (This is aligned to the Rough Sleeping Programme and the wrap around support offer)	Outreach, Multiple Compound Needs Integrated Community Team, peer advocacy and voluntary sector partners, Common Ambition	People have one trusted person who stays with them	**M1**; **T3 (section 2)**	Year 1: lead worker for every Target Priority Group member. Year 2: advocacy offered to all

5.3 Understanding of needs

Strategy Priorities 1 and 2 · Brief · Meets MHCLG section (b): agreeing local needs through shared assessment, intelligence, risk identification and multi-agency case planning.

At this stage, people work with services to understand their housing situation, identify support needs and agree the next steps. Housing Options and partners work alongside outreach, hospitals, probation, adult social care, mental health, substance use and other relevant services to build a shared understanding of a person's circumstances, support and risk and safety needs. For people who have experienced long-term rough sleeping, partners will coordinate support by developing a shared plan, so that services work together around the individual rather than through separate referral pathways.

Who plays a part here: Housing teams and outreach, health, mental health and drug and alcohol services, adult social care, probation, advocacy and peer support, interpreters and immigration advice, and the person themselves, whose account of what they need comes first.

Lived experience/living experience: People described assessment processes that felt overwhelming, difficult to navigate and centred on proving eligibility rather than understanding need. People highlighted digital exclusion, literacy barriers and repeatedly retelling trauma as significant obstacles to engagement. People also highlighted the value of advocates and trusted supporters who helped them navigate systems, understand decisions and ensure their voice was heard.

Challenge	Barrier	What we will do together	Who is involved	Intended outcome	Measure of success	Year and what will be delivered
People repeat their story to every service	No agreement to share information, and partners hold separate records	Undertake a review of all touch points that someone would encounter and work together with lived/living experience, to improve that experience	All Partnership Board members, NHS partners, adult social care, probation, voluntary sector providers	People tell their story once, and partners work from the same picture	Enabler: makes M1 and T1 to T4 measurable **(section 2)**	Year 1: end-to-end journey with all relevant services & partners engaged
Support is planned service by service, and people at greatest risk are not always identified	No single plan, and risk is judged by individual services against their own eligibility	Retain an up-to-date live data set, which includes risk indicators a multi-agency case plan within for each person in the Target Priority Group	Housing teams, outreach, mental health and drug and alcohol services, adult social care, probation, advocacy	One plan around each person, focused on those at greatest risk	**M1**; **M3**; **T3 (section 2)**	Year 1: working with partners to create live data set, and define realistic route

5.4 Receiving support to address multiple compound needs

Strategy Priority 3 · Joined-up support · Meets MHCLG section (c): coordinated support and multi-agency case management; section (e): collaboration between housing, health and social care partners; and section (f): coordination with criminal justice partners where required.

People experiencing long-term rough sleeping often face multiple and interconnected challenges. Local evidence shows many people are interacting with housing, health, substance use, adult social care, criminal justice and voluntary sector services at the same time. For people with multiple compound needs, outcomes are often determined not by a single service, but by how well services work together around the individual.

Who plays a part here: The Integrated Homeless and Multiple Compound Needs Team, health and mental health services, drug and alcohol treatment, adult social care, housing, probation and police, accommodation providers, voluntary sector support workers and peer mentors.

Lived experience/living experience: People consistently told us that they experience their challenges together, even when services respond to them separately. They described having to navigate multiple systems, repeat their story and coordinate support themselves. People wanted services to communicate, share responsibility and work around their goals rather than organisational boundaries.

Challenge	Barrier	What we will do together	Who is involved	Intended outcome	Measure of success	Year and what will be delivered
People are passed between services when needs overlap	Each service holds its own plan, with no shared review	Review live data set for those identified in the Target Priority Group.	Multiple Compound Needs Integrated Community Team, Adult safeguarding Board, housing, primary care, mental health, drug and alcohol treatment, adult social care, probation, police, City Leadership Board	Services share responsibility for one plan	**M1**; **M5**; **T3 (section 2)**	Year 1: review running for the whole Target Priority Group

Challenge	Barrier	What we will do together	Who is involved	Intended outcome	Measure of success	Year and what will be delivered
People with co-occurring mental health and substance use needs cannot get support for both	Services can require one need to be treated first, and people are discharged after missed appointments	We commit to Improving access to integrated support through multi-disciplinary team (MDT) approaches between primary care, mental health services, drug and alcohol treatment and social care, including via outreach and in-reached models. We will do this through Implementing the NICE Guideline on Integrated Health and Social Care for People Experiencing Homelessness, ensuring services are designed around the needs of people experiencing homelessness	Sussex Partnership NHS Foundation Trust, drug and alcohol treatment provider, Combatting Drugs Partnership, working group	People get support for both needs together and keep their services	**M5 (section 2)**	Year 2: Implementing the NICE guidelines
Health leaders are not fully sighted on this TPG	Housing, health and care are not always fully aligned	We will consider opportunities for integrated delivery, including joint commissioning, pooled budgets, multidisciplinary teams and other collaborative approaches that improve outcomes and support delivery of local priorities	Health and Wellbeing Board, Sussex Integrated Care Board, Public Health, adult social care, housing, working group, partnership board, Rough Sleeping Programme	Senior health leaders act on barriers, and people get a more joined-up response	**M1**; **T3 (section 2)**	Year 1: first report to the Health and Wellbeing Board by June 2027

5.5 Accessing temporary or supported accommodation

Strategy Priority 2 · Brief · Meets MHCLG section (c): coordinated delivery of accommodation, support and move-on pathways that help people move away from rough sleeping and sustain recovery.

For many people, moving into temporary or supported accommodation is the first opportunity to step away from the instability of rough sleeping and begin focusing on recovery. Brighton & Hove offers a range of accommodation options, including emergency accommodation, supported housing, Housing First, women-only provision and specialist accommodation. Alongside this, the city's Off the Street Offer and Severe Weather Emergency Protocol provide important routes away from immediate street homelessness. The pathway shows that entering accommodation is a significant milestone, but that people can still become stuck if support does not adapt to their individual needs.

Who plays a part here: Supported accommodation providers and their staff teams, housing teams, drug and alcohol and mental health services, registered providers and landlords, the providers forum, advocacy and peer support, and the people living in the accommodation, whose experience tells us whether it works.

Lived experience/living experience: People told us that there is no single pathway out of rough sleeping and that support needs to look different for different people. Participants emphasised the importance of feeling safe, respected and understood, with accommodation that reflects individual circumstances, strengths and support needs. Some described placements that increased vulnerability, lacked privacy or disconnected them from trusted support networks. People consistently highlighted the importance of continuity of support, access to mental health and wider support services, and approaches that work alongside them to address the reasons that led to rough sleeping in the first place, and allow them to maintain connection with the people, pets and places that support them in feeling a sense of trust, stability and mutual care.

Challenge	Barrier	What we will do together	Who is involved	Intended outcome	Measure of success	Year and what will be delivered
People are evicted or abandon placements and return to the street	Providers, housing, health and treatment services do not act together before a placement breaks down	Council works directly with temporary accommodation providers to ensure that people are not evicted from placement	Supported and temporary accommodation providers, providers forum, housing, drug and alcohol and mental health services	Placements hold, and as few people as possible return to experience rough sleeping	**M2**; **T4 (section 2)**	Year 1: revised way of working with temporary accommodation providers

Challenge	Barrier	What we will do together	Who is involved	Intended outcome	Measure of success	Year and what will be delivered
Placements do not meet the needs of people with the most complex needs	Placement is by vacancy, with limited options for women, couples, pets and people needing self-contained accommodation	Understanding where there is a shortfall of temporary accommodation and increasing provision of those types, to best meet the needs of people who otherwise would not feel able to enter temporary accommodation Applying same standard for suitable move on accommodation. (Aligns to Rough Sleeping Programme)	Housing commissioning, accommodation providers, Temporary Accommodation Action Group, Common Ambition	People are placed somewhere safe that suits them, and fewer offers are refused	**M1**; **T3 (section 2)**	Year 1: Continuous review of live data set, Year 2-3: Increasing relevant Temporary Accommodation and settled accommodation provision
Some people's needs are too high for supported housing but do not meet residential care thresholds	No provision for this group	Wrap around support that sit alongside accommodation offers, recognising those needs may change over time. (Aligns to Rough Sleeping Programme)	Adult social care, housing commissioning, Mental Health Accommodation Group, NHS partners, Rough Sleeping Programme, working group	People with the highest needs have somewhere suitable to live	**M1**; **T3 (section 2)**	Year 1: Rough Sleeping Programme assessing live data sets and alignment with wrap around support. Year 2-3: work continues

5.6 Obtaining longer-term housing

Strategy Priorities 2 and 3 · Lasting · Meets MHCLG section (c): delivering sustainable impacts through settled housing, coordinated move-on planning and long-term support.

Moving on from temporary or supported accommodation is an important stage in the pathway. It creates opportunities for greater independence, stability and recovery, but it can also be one of the most challenging transitions. People may be preparing to move into social housing, private rented accommodation, Housing First or other longer-term housing options, often while continuing to manage health needs, recovery, finances and wider support needs. Partners and people with lived experience highlighted that moving indoors after extended periods of rough sleeping can be a significant transition. Adjusting to a home, rebuilding routines and managing isolation may require ongoing practical and emotional support.

Who plays a part here: Housing teams, registered providers and private landlords, Housing First and floating support services, health, treatment and social care, benefits and money advice, furniture and practical help projects, and neighbours and communities who make somewhere feel like home.

Lived experience/living experience: People told us that moving on is not simply a set of keys. Participants highlighted the importance of continuity of support, trusted relationships and practical help during transitions. Many described needing time to adjust, support that recognises trauma and multiple compound needs, and services that understand the reasons they began to experience a cycle of rough sleeping in the first place. People emphasised that successful move-on depends on feeling safe, seen and valued, having hope for the future, and knowing that support will remain in place while they build a life beyond rough sleeping.

Challenge	Barrier	What we will do together	Who is involved	Intended outcome	Measure of success	Year and what will be delivered
There are not enough accommodation for people who have slept rough longest	Limited affordable housing, an expensive private rented sector, and no agreed share of lettings for this group	Working in close alignment with the Rough Sleeping Programme and dedicated funding for accommodation beyond initial offer	Council housing and allocations, registered providers, private landlords, Housing First providers, Rough Sleeping Programme and Working Group	People who have slept rough longest move into accommodation	**M1**; **T3 (section 2)**	Year 1: identification of TPG and their requirements more settled accommodation. Year 2-3: standing up provision and ensuring people have wrap around support to sustain those offers

Challenge	Barrier	What we will do together	Who is involved	Intended outcome	Measure of success	Year and what will be delivered
People wait too long to move on	Move-on delays are not reviewed across partners, and there is no consistent practical help	We will understand the barriers from people moving on from Temporary accommodation and continue to increase suitable supply, whilst continue to work with partners and residents in temporary accommodation to ensure people are best set up to sustain accommodation	Working Group, housing, registered providers, VCSE partners, mental health support	People move on when ready, into a home they can live in and afford	**M1**; **T3 (section 2)**	Year 1: understanding barriers from people moving on from TA Year 2-3: increasing suitable supply and working alongside partners and residents in TA to ensure people best set up to sustain accommodation

5.7 Sustaining a home

Strategy Priority 3 · Lasting · Meets MHCLG section (c): supporting people to sustain their housing, maintain wellbeing and prevent returns to rough sleeping.

Moving into a home is a significant step but sustaining it can bring new challenges. For people who have experienced long-term rough sleeping, settling in often involves rebuilding routines, managing finances, maintaining physical and mental health, continuing recovery, and developing connections within the community. The pathway highlights that housing alone does not guarantee stability; people are often still navigating many of the same challenges that contributed to homelessness in the first place.

Who plays a part here: Health and social care, drug and alcohol recovery services, peer and community organisations, faith groups, employment, training and volunteering, landlords and providers, and the person's own networks and community.

Lived experience/living experience: People told us that receiving the keys to a home is only one part of the journey away from rough sleeping. Participants highlighted the importance of ongoing support, trusted relationships and having somewhere to turn when challenges arise. Many described the need for consistency, community connections and support that adapts as circumstances change. Sustaining a home was seen as more than maintaining a tenancy; it was about building confidence, stability, wellbeing, purpose and a life beyond experiencing rough sleeping.

Challenge	Barrier	What we will do together	Who is involved	Intended outcome	Measure of success	Year and what will be delivered
Support reduces before people feel settled	Resettlement support is time-limited rather than based on need	Partners take a collaborative approach to ensure that people have the right support at the right time (including after they have accommodation)	tenancy sustainment services, Housing First providers, Multiple Compound Needs Integrated Community Team	People sustain accommodation and feel part of community	**T4**; **M1 (section 2)**	Year 2: Residents feel a greater sense of connection and support from partners and community
Help arrives only once eviction proceedings start	Early warning signs, including cuckooing, are not shared between landlords and support services	Provider, partners and council work closely to ensure person centred trauma informed approach occurs at every point. Agree a temporary accommodation charter	Council housing, registered providers, private landlords in the access package, Sussex Police and community safety	Risks are dealt with before tenancies break down	**T4 (section 2)**	Year 1: TA charter agreed. Year 2-3: Implement the charter

6. Children, families and young people

Strategy Priority 4: tackle homelessness in children, families and young people · Rare · Meets MHCLG section (b): early identification and prioritisation.

The seven stages above describe a common pathway through homelessness and rough sleeping. However, children, families and young people often experience homelessness differently. For many, homelessness is triggered by a sudden change in circumstances rather than years of escalating need. This matters to our Long-Term Rough Sleeping Partnership Plan because the factors associated with long-term rough sleeping often emerge much earlier in life. Experiences such as family relationship breakdown, care experience, exclusion, trauma, unstable housing and poor transitions into adulthood can increase vulnerability to homelessness and rough sleeping later on. Preventing homelessness among children and young people is therefore one of the most important opportunities to reduce future rough sleeping.

Who plays a part: Preventing future rough sleeping among children, families and young people requires coordinated action across Housing, Children's Services, education, health, youth justice and the voluntary and community sector. The city already has strong foundations through joint Housing and Children's Services arrangements, family mediation and prevention services, young people's supported accommodation, the 18 to 25 pathway, care leaver support and the Young Homeless Working Group. Voluntary and

community organisations play an important role in identifying risks early, building trusted relationships and helping young people navigate support.

Shared by the voluntary and community sector: Services report increasing complexity in the needs of children and young people seeking support. Housing insecurity is often experienced alongside poor mental health, trauma, neurodiversity, family challenges and financial insecurity. Practitioners highlight that young people can find services difficult to navigate, reinforcing the importance of coordinated support before housing issues become more entrenched.

Challenge	Barrier	What we will do together	Who is involved	Intended outcome	Measure of success	Year and what will be delivered
Young people fall through gaps at 16, 17, 18 and on leaving custody	Transitions between children's and adult services, and from custody, are not joined up	Agree data review for every homeless 16- and 17-year-old, alongside clear accommodation planning for care leavers from 6 months before they reach 18 and align release planning with youth justice	Children's Services and leaving care, Housing, youth justice, Young Homeless Working Group, YMCA DownsLink Group, VCSE	Young people move into adulthood with somewhere safe to live	**M2**; **T1 (section 2)**	Year 1: joint arrangements in place Year 2-3: implement accommodation planning for 18-25 years
Young people lose support when they move into their own accommodation	Support ends at the point of move-on	Continue support through the 18 to 25 pathways into supported and settled accommodation	Young people's supported accommodation providers, leaving care, Housing, voluntary and community sector	Young people sustain independence, and homelessness and rough sleeping is not a risk	**T4**; **M2 (section 2)**	Year 2: support continues into settled accommodation including connection with suitable partners across city and feeling part of a community

7. Working together across the system

Meets MHCLG sections (c), (d), (e) and (f): partnership working, governance, health collaboration and criminal justice collaboration

The pathway describes the experience of people at risk of, or experiencing, long-term rough sleeping. Alongside it sits our partnership model, which describes how organisations work together at each stage. Different challenges emerge at different points in the pathway, and different parts of the system need to come together to respond. Partners have reflected that positive outcomes often depend on informal relationships and individual knowledge of the system.

Our approach is based on three principles:

- **Shared responsibility**. Long-term rough sleeping is not the responsibility of a single service. Housing, health, social care, criminal justice, substance use, welfare and community services each have a role in preventing people from reaching, remaining in or returning to rough sleeping.
- **Coordinated decision making**. Where people experience multiple compound needs, partners come together around shared plans, shared intelligence and shared outcomes, rather than working through separate service pathways.
- **Escalation and accountability**. When barriers cannot be resolved through day-to-day partnership working, there are clear routes for escalation through our governance arrangements, including the Homelessness and Rough Sleeping Partnership Board, Health and Wellbeing Board, Safeguarding Adults Board and Community Safety Partnership.

The Homelessness and Rough Sleeping Partnership Board provides strategic leadership across the whole pathway. Alongside this sit our health and care, safeguarding, and criminal justice partnerships, ensuring that decisions affecting people experiencing long-term rough sleeping are addressed within the wider systems that shape their lives.

7.1 The pathway: what a person experiences

Demonstrates how MHCLG sections (a) to (f) are applied in practice, linking the Strategy, Target Priority Group, shared pathway, partnership arrangements and governance framework.

The diagram below is our pathway out of long-term rough sleeping. Reading it from the top:

- **Our strategy sits above everything:** The four priorities of the Homelessness and Rough Sleeping Strategy 2025–30 run across the top, so partners can see that this plan delivers commitments we have already made.
- **Prevention, Rare, brief and lasting:** Each part of the pathway contributes to one of these: stopping people reaching the streets, getting them off quickly, and making sure a home is sustained.
- **The Target Priority Group runs through every stage:** The people experiencing the most entrenched forms of rough sleeping, or at greatest risk of becoming trapped in rough sleeping, are identified through shared intelligence, need, risk and vulnerability, rather than solely where they are sleeping.
- **Seven areas:** From being at risk, through finding support, understanding needs, coordinated support around multiple compound needs, temporary or supported accommodation, finding long-term housing, and settling in and recovery.
- **The whole system underneath:** Eleven parts, from housing and outreach to physical and mental health, drugs and alcohol, adult social care, justice, money and work, women and domestic abuse, young people and care leavers, and asylum, migration and hidden homelessness. It is never only about housing.
- **Running through it all:** people with lived experience, voluntary, community and faith sector, embedding trauma-informed practice, sharing data, and learning together.

The pathway reflects our current understanding of how people experience and move away from long-term rough sleeping. It will continue to evolve as we develop our evidence base, including learning from the Supported Accommodation Needs Assessment and the implementation of the Supported Accommodation Strategy

Our pathway out of long-term rough sleeping, and the system around it

What our Homelessness and Rough Sleeping Strategy 2025–30 commits us to

Priority 1
Prevent homelessness and rough sleeping

Priority 2
Improve temporary accommodation pathways and experiences

Priority 3
Joined-up support for people who need help most

Chapter
Tackle homelessness for children, families and young people

Rare: stop people reaching the streets

Brief: off the street quickly, with the right support

Lasting: a home that holds, and a life beyond it

1. At risk of long-term rough sleeping
Strategy 1 and 4 · Rare
People known to services before the streets: in temporary or supported housing, leaving prison, hospital, care or asylum accommodation, sofa surfing or facing eviction.
Housing Options, supported housing providers, probation and prisons, hospital discharge teams, mental health services, leaving care, asylum support, drug and alcohol services

2. Finding support
Strategy 1 and 3 · Rare and brief
First contact, on the street or through a door someone chooses to walk through, with a real offer and a trusted person.
Street Outreach Service, YMCA Youth Advice centre, StreetLink, First Base, Antifreeze, Clock Tower Sanctuary, Sussex Nightstop, faith and community groups, peer advocates

3. Understanding needs
Strategy 1 and 2 · Brief
Assessment that is trusting rather than doubting; agreeing together who is in our Target Priority Group and what each person needs.
Housing Options, outreach, Arch Healthcare, mental health and drug and alcohol services, adult social care, probation, risk assessment tools

4. Receiving support around multiple compound needs
Strategy 3 · Brief and lasting
One plan and one lead worker around the person, with services flexing to them: the heart of this partnership.
Integrated Homeless and Multiple Compound Needs Team, Changing Futures Sussex, multi-agency case meetings, Homeless and MCN Partnership, health, care, treatment and justice partners

5. Accessing Temporary or supported accommodation
Strategy 2 · Brief
Somewhere safe that supports recovery and leads onwards, with move-on planned from day one.
Severe Weather Emergency Protocol, Off Street Offer, supported accommodation pathways, women-only and specialist provision, providers forum, supported housing licensing

6. Obtaining long-term housing
Strategy 2 and 3 · Lasting
A settled home of their own, with the support that makes it possible to keep it.
Housing First, council and registered provider homes, private rented access, Rough Sleeping Programme settled homes, tenancy sustainment, move-in support

7. Settling in, recovery and a life beyond homelessness
Strategy 3 · Lasting
Staying well, staying housed, and building connection, purpose and income.
Health and social care, drug and alcohol recovery, mental health support, peer support, employment and meaningful activity, community and faith groups

Our Target Priority Group runs through every stage: the people at highest risk of harm, furthest from services and least likely to ask for help, identified by need rather than where they are sleeping

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Housing and accommodation
Housing Options and homelessness duties, Severe Weather Emergency Protocol, Off Street Offer, supported accommodation pathways, Housing First, council and registered provider homes, private rented access, move-on and tenancy sustainment

Outreach and day services
Street Outreach Service, StreetLink, First Base, YMCA Youth Advice Centre drop-in', Antifreeze, Clock Tower Sanctuary for 16 to 25-year-olds, Sussex Nightstop, food and drop-in projects, night shelters and faith provision

Physical health
Arch Healthcare specialist GP practice, Pathway hospital in-reach, Homeless Health Inclusion Team, integrated homeless healthcare hub, hospital discharge, dentistry and screening

Mental health
Community, crisis and inpatient care, dual diagnosis support, Mental Health and Housing Plan, Mental Health Accommodation Group, psychologically informed practice

Drugs and alcohol
Change Grow Live treatment and recovery, rough sleeping treatment funding, harm reduction, Combatting Drugs Partnership, learning from drug-related deaths

Adult social care and safeguarding
Integrated Homeless and Multiple Compound Needs Team, Care Act assessments, Mental Capacity Act, self-neglect and safeguarding, Safeguarding Adults Board, learning from deaths

Prisons and Probation
Prisons, probation and the Duty to Refer, police and Community Safety Partnership, courts and remand, women leaving custody, navigator and resettlement support

Money, welfare and work
Welfare benefits and Universal Credit, identification documents, budgeting and debt, discretionary help, employment, training and meaningful activity

Women, domestic abuse and specialist support
Violence against women and girls services, women-only accommodation, domestic abuse support, women's rough sleeping census, LGBTQ+ and culturally specific support

Children, Families and Young People
Children's services and leaving care, *young people's supported accommodation, YMCA Youth Advice Centre,* Clock Tower Sanctuary, Sussex Nightstop, targeted youth prevention, education and training

Asylum and migration
Move-on from asylum accommodation, support for newly granted refugees, no recourse to public funds advice, immigration and rights advice,

Hidden homelessness
People who are sofa surfing, living in insecure accommodation, staying temporarily with friends or family, or otherwise experiencing homelessness that is not visible to services.

Running through every stage and every service
People with lived experience and Brighton & Hove Common Ambition · our voluntary, community and faith sector · trauma-informed and trusting practice · shared data and information sharing · learning together from what works and from every adverse circumstance including those who have died whilst experiencing homelessness and long-term rough sleeping

7.2 The partnership: when we come together

Meets all MHCLG sections

The second diagram below uses the same seven stages along the top. Beneath them:

- **The Homelessness and Rough Sleeping Partnership Board spans the whole pathway:** This is our strategic board for this plan: it owns the shared goal, agrees what goes into the Action Plan, holds partners to their contributions, unblocks what other boards cannot, and reports to Cabinet and our MHCLG adviser.
- **Three statutory strands sit beneath it, each with its own family of groups:** Health and care through the Health and Wellbeing Board, with the Multiple Compound Needs Board, Combatting Drugs Partnership, Mental Health Accommodation Group and Integrated Community Teams. Safeguarding and learning through the Safeguarding Adults Board, covering reviews, audits, the Multi-Agency Risk Management framework and safeguarding for 18 to 25-year-olds. Justice and community safety through the Community Safety Partnership, with Integrated Offender Management, MAPPA, anti-social behaviour powers and prison and probation resettlement arrangements.
- **Seven coordination moments:** The middle row is the practical part: what triggers partners to come together at each stage, and which meeting does it. This is where the plan stops being a diagram and becomes a way of working.
- **An accountability loop at the bottom:** What comes back up, where it is considered, what changes, and how we know it is working.

Which part of our system meets at which point on the pathway

The pathway	1. At risk of long-term rough sleeping	2. Finding support	3. Understanding needs	4. Receiving support to address multiple compound needs	5. Accessing Temporary or supported accommodation	6. Obtaining long-term housing	7. Sustaining a home
Owns the plan	**Homelessness and Rough Sleeping Partnership Board — our strategic board across the whole pathway** Sets the shared goal, agrees with the Action Plan, holds partners to their contributions, unblocks what other boards cannot, and reports to Cabinet and MHCLG						
Health and care Health and Wellbeing Board	**Health and Wellbeing Board: system leadership for health, care and public health** Underneath it: Multiple Compound Needs Board and Homeless and MCN Partnership · Combatting Drugs Partnership · Mental Health Accommodation Group · Integrated Community Teams and inclusion health · Joint Strategic Needs Assessment, Joint Health and Wellbeing Strategy and Shared Delivery Plan						
Safeguarding and learning Safeguarding Adults Board	**Safeguarding Adults Board: statutory oversight of adults at risk** Through it: Multi-Agency Risk Management framework for complex and self-neglect cases · Safeguarding Adult Reviews, audits and learning · Learning and Development and Pan-Sussex policy · Practitioners Alliance · transitional safeguarding for young people moving from children to adult services at 18 to 25, with the Safeguarding Children Partnership						
Justice and community safety Community Safety Partnership	**Community Safety Partnership, with prisons and probation** Through it: Integrated Offender Management delivery group · MAPPA · anti-social behaviour and the powers replacing the Vagrancy Act · youth offending · with HMPPS prison and probation resettlement arrangements, including the Community Accommodation Service for prison leavers at risk of homelessness, and the Sussex Criminal Justice Board						

When does coordination need to happen, and who meets?

The moment	Someone is about to lose their housing, leave prison, hospital or care	Someone is found sleeping rough	We need to understand what someone needs	Support is not working, or services disagree	Someone needs somewhere to stay	Someone is ready for a home of their own	Someone is settling in, or at risk of losing their home
What triggers partners to come together at this point	Pre-release and resettlement planning with prisons, probation and the Community Accommodation Service · hospital and mental health discharge planning · transitions planning for 18 to 25-year-olds leaving care · alerts from supported housing about evictions · asylum move-on notifications	Daily outreach coordination and referrals · review of who is in our Target Priority Group · severe weather protocol · decisions about enforcement only alongside a real offer	Multi-agency assessment and one agreed support plan with a named lead worker · Multi-Agency Risk Management for the highest-risk cases · Care Act and Mental Capacity Act decisions	Multidisciplinary team and case meetings · health, treatment and social care in-reach · blockages escalated to the MCN Board or the relevant partnership, then to the Partnership Board	Placement and exclusion decisions · providers forum on quality, move-on and evictions · supported housing licensing · risk management where there are justice concerns	Housing First and allocations panels · Rough Sleeping Programme settled homes · move-on planning with providers and registered providers.	Tenancy sustainment and step-down reviews · continuing health, treatment and peer support · learning where a tenancy or a life is lost, through the Safeguarding Adults Board and death reviews.

The wider system	**Our voluntary, community and social enterprise sector works alongside every stage** Homelessness and Rough Sleeping Network (sector leaders) · Supported Accommodation Providers Forum · Frontline Network and Homelessness Research Forum · outreach, day services, health, advice and faith organisations · registered providers and landlords
Lived experience	**People with lived experience shape, test and check every stage and every board** Our lived experience group and Brighton & Hove Common Ambition · peer roles in services · a direct route to the Partnership Board

How the structure keeps us on track to halve long-term rough sleeping

What comes back up
Learning from Safeguarding Adult Reviews, death reviews and audits · repeated blockages seen in case meetings · what frontline workers and people with lived experience tell us

→

Where it is considered
The relevant board first: health and care, safeguarding, or justice · then the Partnership Board for anything needing partners to change how they work

→

What changes
The Action Plan is updated with who will do what, by when · partners change practice, policy or commissioning · what changed is shared back with frontline teams

→

How we know
Monthly review of the Target Priority Group · quarterly Local Outcomes Framework and case-level data ·

Strategy → this partnership plan → Action Plan → each partner's own plans
The strategy sets what we want to achieve · this plan sets how we work together across the pathway · the Action Plan provides the framework

8. A journey through the system

Demonstrates how MHCLG sections (a) to (f) operate in practice. The example shows how partners identify people most at risk of long-term rough sleeping, coordinate support around the individual, use governance and escalation arrangements to address barriers, and work together across housing, health, social care, criminal justice and community services to achieve lasting outcomes.

The table below follows one person across the seven stages of our pathway, in four rows.

- **What we want to be true for the person**
  The experience we are working towards, in their words: someone notices before I lose my home; someone finds me and has something real to offer; I tell my story once and I am believed; one person sticks with me; I have somewhere safe that suits me; I get a home of my own and support moves with me; I stay well, stay housed and build a life I choose.

- **What usually gets in the way**
  The barriers we hear about most often, from support arriving only once someone is experiencing rough sleeping, through repeated assessments and fragmented services, to support ending before people feel settled in their home.

- **What we do differently**
  The partnership's response: identifying people most at risk through the Target Priority Group, coordinating outreach around a real offer, developing one shared plan and lead worker, preventing accommodation breakdown, planning move-on earlier, and ensuring support steps down rather than stops.

- **Who clears the way when it gets stuck**
  The governance, operational groups and partnerships that work together to remove barriers. No challenge should have to be solved by a single worker alone. When barriers cannot be resolved around the individual, they are escalated through partnership arrangements so that services, commissioners and leaders can act together.

8.2 The Journey:

	1. At Risk of Long-Term Rough Sleeping	2. Initial Support	3. Understanding Needs	4. Coordinated Support for Multiple Compound Needs	5. Temporary or Supported Accommodation	6. Longer-Term Housing	7. Sustaining a Home
What we want to be true for the person	Someone notices I am at risk and helps before I lose my home	Someone knows my name and has something real to offer	I tell my story once and my situation is understood	One person stays alongside me and services work together around me	I have somewhere safe that suits me and supports my recovery	I get a home of my own and support moves with me	I stay well, stay housed and build a life I choose
What usually gets in the way	Support arrives after crisis, and people leave services without a housing plan	People struggle to find support they can accept and have to start again when workers change	Assessments are repeated and people have to prove their need repeatedly	Services operate separately and people are passed between systems	Placements do not always meet people's needs and can break down	There are not enough settled homes and move-on takes too long	Support reduces too soon and problems are identified only when tenancies are at risk
What we do differently	We identify a Target Priority Group, plan transitions early and prevent a first night on the street	Everyone has a lead worker, flexible support and access to advocacy	One shared assessment, shared information and one plan around the person	Multi-agency teams share responsibility for outcomes and review progress together	We match people to the right accommodation and prevent evictions to the street	We create routes into settled housing and plan move-on from day one	Support steps down rather than stops, with early intervention when risks emerge
Who clears the way when it gets stuck	Prevention and transition planning arrangements identify risks early and escalate unresolved barriers	Outreach and operational partners review people not engaging and adapt the response	Multi-agency case planning resolves disputes and agrees the shared plan	The Multiple Compound Needs Integrated Community Team coordinates action across agencies	Providers, commissioners and housing partners act when placements are breaking down or suitable options do not exist	Housing providers and partners unblock move-on and increase access to settled homes	Tenancy sustainment, housing, health and community safety partners intervene before tenancies fail

8.3 Why this matters for our governance

Every working group, operational forum and board exists to remove barriers that prevent people moving through the pathway. Most barriers should be resolved around the individual through coordinated case planning and multi-agency support. Where the same barriers continue to affect multiple people, governance provides a route for escalation.

Operational groups identify the issue, partnership forums review why it continues to occur, and the Partnership Board agrees the changes needed to prevent it happening again. This creates a clear link between lived experience, service delivery and strategic leadership.

In practice, this means that:

- individual barriers are addressed through multi-agency support and case coordination;
- recurring barriers are escalated to the appropriate forum or board;
- system-wide issues become priorities for service improvement, commissioning or policy change;
- learning is fed back into the pathway so that fewer people encounter the same barrier in future.
- This approach ensures that no person is left trying to navigate system barriers alone. The responsibility for removing obstacles sits with the partnership, creating a system that is increasingly able to prevent, identify and end long-term rough sleeping.

9. Working together from here

This plan sets out how we will work together to reduce and ultimately end long-term rough sleeping in Brighton & Hove. It translates the ambitions of our Homelessness and Rough Sleeping Strategy 2025-2030 into a shared approach that brings together housing, health, social care, criminal justice, voluntary, community and faith sector organisations, accommodation providers, and people with lived experience/living experience.

Throughout this plan, we have identified where people become trapped in long-term rough sleeping, where the system works well, and where stronger partnership action is needed. We have set out a shared pathway, established a collective focus through our Target Priority Group, and described how organisations will work together to prevent rough sleeping, respond earlier, coordinate support and help people move towards stable housing and life beyond the streets.

The plan is supported by an Action Plan which sets out the specific actions, responsibilities and timescales required to deliver change. Together, these documents provide the framework for achieving our shared ambition and improving outcomes for people experiencing long-term rough sleeping.

Ending long-term rough sleeping will require sustained commitment across the whole system. No single organisation can achieve this alone. Success depends on partners sharing responsibility, aligning resources, listening to people with lived experience/living experience, and working together around shared priorities and outcomes.

By working together, we can intervene earlier, reduce the number of people experiencing a rough sleeping cycle, strengthen routes away from the streets, and provide the housing, support and opportunities people need to build lasting stability. Our ambition is simple: fewer people experience long-term rough sleeping, fewer people return to it, and more people are able to move into and sustain a home of their own.

10. Keeping this plan under review

Meets MHCLG section (d): ownership, governance and continuous learning through regular review, systems maturity assessment, partnership oversight and plan refresh.

This Partnership Plan is a live document. It reflects our current understanding of long-term rough sleeping in Brighton & Hove, the needs of people experiencing it, and the collective action required to reduce it.

We recognise that needs, evidence, services and partnerships will continue to evolve. New opportunities will emerge, barriers will be identified, and learning from delivery, lived experience/living experience, data, reviews and system maturity assessments will help us improve our approach over time.

The plan will therefore be reviewed regularly through the Homelessness and Rough Sleeping Working Group and Partnership Board. Progress, performance, learning and emerging priorities will be considered alongside Local Outcomes Framework measures, Target Priority Group reviews and feedback from partners and people with lived experience/living experience.

Where changes are required, the plan will be updated to reflect new evidence, changes in local need, national policy developments, partnership learning and agreed improvements to the way we work together. Any changes will be reflected through the Action Plan and reported through the governance arrangements set out in this document.

By treating this plan as a living partnership commitment, we will ensure that our response to long-term rough sleeping remains ambitious, responsive and focused on achieving lasting change.

General Equality Impact Assessment (EIA) Form

Support:

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

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

Processing Time:

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

Process:

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

1. Assessment details

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

Read the EIA toolkit for more information.

Name of activity or proposal being assessed:	**Suitability of Temporary Accommodation Policy**
Directorate:	Homes and Adult Social Care
Service:	Housing People Services
Team:	Temporary and Supported Accommodation
Is this a new or existing activity?	Existing
Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)	Yes, HNC Allocations Policy EIA 2024 and EIA-HASC-Homelessness-and-Rough-Sleeping-Strategy-2025-30

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

Responsible Lead Officer:	Harry Williams, Director of Housing People Services
Accountable Manager:	Aaron Burns, Head of Housing People Services – Temporary & Supported Accommodation
Additional stakeholders collaborating or contributing to this assessment:	Luke Harris, Housing Options Manager Louise Lowery, Temporary Accommodation Manager Elizabeth Leach, Project Manager Tom Matthews, Housing Performance Analyst

3. About the activity

Briefly describe the purpose of the activity being assessed:

The purpose of the Suitability of Temporary Accommodation Policy is to provide a clear and consistent framework for assessing the suitability of temporary accommodation for homeless households. The policy ensures that individual needs and circumstances are considered, supporting fair, lawful, and equitable decision-making.

What are the desired outcomes of the activity?

The policy aims to allocate scarce temporary accommodation resources to those most in need, ensuring that temporary accommodation placements are suitable, safe, and responsive to the needs of individual households. It promotes consistent and equitable decision-making, supports compliance with statutory duties, and helps to minimise any disproportionate impact on people with protected characteristics or other vulnerabilities.

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

The policy is likely to have the greatest impact on people who are homeless or threatened with homelessness and require temporary accommodation, as it directly determines how the suitability of accommodation is assessed and the factors that are considered in placement decisions.

Disabled people may be particularly affected because their accommodation needs may include accessibility requirements, adaptations, proximity to healthcare services, or support networks. Failure to take these needs into account could affect their ability to live independently and safely.

Families with children, pregnant women, and new parents may be affected because accommodation location, size, safety, and access to schools, childcare, healthcare, and family support networks can have a significant impact on household wellbeing and child development.

Older people may have mobility issues, health conditions, or support needs that make the location and physical characteristics of accommodation particularly important to its suitability.

Victims and survivors of domestic abuse may be affected because accommodation decisions must take account of safety considerations, risk management, confidentiality, and access to specialist support services.

People from minority ethnic communities and those whose first language is not English may experience barriers in accessing housing services and information, and may rely on community networks, faith groups, or local services when temporary accommodation is being considered.

LGBTQ+ individuals may have specific safety, wellbeing, or support needs which could influence the suitability of accommodation and location.

People with mental health conditions, substance misuse issues, or other complex support needs may require accommodation that enables access to treatment, support services, and established support networks to promote stability and wellbeing.

The policy seeks to mitigate potential negative impacts on these groups by requiring a thorough assessment of individual circumstances and ensuring that accommodation decisions are made fairly, consistently, and in accordance with legal and statutory requirements. There are also programmes in place to increase the supply of temporary accommodation and therefore support more individuals across the area.

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.

Formal consultation is being considered at present, with decisions on the scale and method of consultation under discussion. The policy has been developed through engagement with Housing Options and Temporary Accommodation managers with operational responsibility for homelessness and temporary accommodation services. It has also been informed by analysis of temporary accommodation client data, other equality impact assessments, such as for the homelessness and rough sleeping strategy and the housing allocations policy, as well as relevant legislation and statutory guidance.

The introduction of a Suitability of Temporary Accommodation Policy is consistent with expectations within the statutory homelessness framework and supports the Council in demonstrating how it meets its legal duties to ensure that accommodation provided to households is suitable for their individual needs and circumstances. The primary purpose of the policy is to provide a clear and consistent framework for assessing suitability and to ensure that households are placed in accommodation that appropriately reflects their health needs, accessibility requirements, safeguarding considerations, family circumstances, support networks, education, and employment needs wherever reasonably practicable.

This evidence and operational experience have been used to identify groups that may be disproportionately affected and to ensure that individual needs and circumstances remain central to accommodation decisions. Any future consultation undertaken will be used to further inform the policy and Equality Impact Assessment and identify any additional impacts or mitigations.

5. Current data and impact monitoring

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

(State Yes, No, Not Applicable as appropriate)

Age	YES
Disability and inclusive adjustments, coverage under equality act and not	YES

Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	YES
Religion, Belief, Spirituality, Faith, or Atheism	YES
Sex	YES
Gender (including non-binary and Intersex people)	YES
Gender Reassignment	YES
Sexual Orientation	YES
Marriage and Civil Partnership	NO
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	NO
Armed Forces Personnel, their families, and Veterans	YES
Expatriates, Migrants, Asylum Seekers, and Refugees	YES
Carers	NO
Looked after children, Care Leavers, Care and fostering experienced people	YES
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	YES
Socio-economic Disadvantage	YES
Homelessness and associated risk and vulnerability	YES
Human Rights	YES
Another relevant group (please specify here and add additional rows as needed)	YES
Households with children	YES
People placed outside Brighton & Hove	YES

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

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

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

Not all protected characteristics are captured within the data about households in TA available from Home Connections and NEC Housing. Some characteristics are not routinely collected through

homelessness and temporary accommodation processes, while others may be under-reported where residents choose not to disclose personal information.

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

Monitoring arrangements:

- Regular monitoring of temporary accommodation placements by protected characteristic by the Temporary Accommodation Team with support from Housing Data Analysts where needed.
- Monitoring of out-of-borough placements, complaints and suitability review requests by the Temporary Accommodation Team with support from Housing Data Analysts where needed.
- Analysis of outcomes for disabled applicants and other vulnerable groups by the Temporary Accommodation Team with support from Housing Data Analysts where needed.
- Review of customer feedback and safeguarding concerns by the Temporary Accommodation Team.
- Annual review of the EIA and policy, or earlier if significant issues are identified, conducted as part of the overarching Homelessness and Rough Sleeping Strategy Action Plan review cycle.

6. Impacts

Advisory Note:

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

        - Census 2021 population groups Infogram: Brighton & Hove by Brighton and Hove City Council
    - Census and local intelligence data
    - Service specific data
    - Community consultations
    - Insights from customer feedback including complaints and survey results
    - Lived experiences and qualitative data
    - Joint Strategic Needs Assessment (JSNA) data
    - Health Inequalities data
    - Good practice research
    - National data and reports relevant to the service
    - Workforce, leaver, and recruitment data, surveys, insights
    - Feedback from internal 'staff as residents' consultations
    - Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
    - Insights, gaps, and data analyses on 'who' the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.
- Learn more about the Equality Act 2010 and about our Public Sector Equality Duty.

6.1 Age

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

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

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

The data indicates that people in temporary accommodation are disproportionately concentrated in the 30 to 59 age range and are less likely to be aged 60 and over than the wider Brighton & Hove population. This is likely because households with dependent children are more likely to be owed the main housing duty and therefore require temporary accommodation. Older people may be less affected overall because they are more likely to be owner occupiers or already living in settled social housing. However, where older people are placed in temporary accommodation, suitability decisions may have a greater impact because of potential mobility, health and support needs.

(NEC Housing (NECH) and Home Connections (HC))

6.2 Disability:

Does your analysis indicate a disproportionate impact relating to Disability, considering our anticipatory duty?	YES

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

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

The available data suggests that disabled people are likely to be disproportionately affected by the policy. Home Connections data indicates that a higher proportion of temporary accommodation clients are recorded as having a long-term health condition or disability than the wider Brighton & Hove population. Disabled households may be more affected by decisions regarding property accessibility, proximity to healthcare, support networks and transport links. The suitability assessment process is therefore particularly important in mitigating potential adverse impacts for this group. Reasonable and inclusive adjustments will be made to the suitability assessment and communication process where required, including accessible information, interpretation or other communication support, so households can understand decisions and communicate relevant needs. *(NEC Housing (NECH) and Home Connections (HC))*

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).

A household's individual circumstances will be taken into account when allocating temporary accommodation, which includes physical access to and around the accommodation, space to mobilise, the accessibility of bathroom and kitchen facilities, and modifications to assist people with needs arising from sensory loss as well as mobility needs

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

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

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

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

The analysis identifies that Black and Racially Minoritised (BRM) households are overrepresented within the temporary accommodation population when compared with the city population. The evidence suggests this may be linked to higher levels of private rented sector occupation, greater exposure to tenancy loss and some homelessness triggers such as domestic abuse and asylum-related accommodation changes. As a result, decisions relating to suitability, location and access to services may have a greater impact on some ethnic minority households, particularly where placements are away from established community and support networks. *(NEC Housing (NECH) and Home Connections (HC))*

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

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

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

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

6.5 Sex:

Does your analysis indicate a disproportionate impact relating to Sex	YES

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

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

Women are overrepresented amongst temporary accommodation households compared with the general population. The analysis suggests this is linked to the higher proportion of women acting as the main applicant in households with dependent children, who are more likely to be in priority need under homelessness legislation. Consequently, decisions about accommodation size, location, schools and support networks may have a greater impact on women, particularly lone-parent households. *(NEC Housing (NECH) and Home Connections (HC))*

6.6 Gender and Gender Reassignment:

Does your analysis indicate a disproportionate impact relating to Gender Identity **(including non-binary and intersex people)?**	NO

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

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

Does your analysis indicate a disproportionate impact relating to Gender Reassignment**?**	NO

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

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

6.7 Sexual Orientation:

Does your analysis indicate a disproportionate impact relating to Sexual Orientation**?**	NO

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

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

6.8 Marriage and Civil Partnership:

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

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

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

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

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

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

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

Pregnant people and households with new babies may have additional health, accessibility and support needs, including access to maternity and healthcare services, which will be considered as part of the individual suitability assessment where relevant.

6.10 Armed Forces Personnel, their families, and Veterans:

Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?	NO

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

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

6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

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

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

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

The wider analysis identified a disproportionately high proportion of Black and Racially Minoritised households amongst those leaving Home Office asylum accommodation. This suggests some migrant and refugee groups may be more likely to experience homelessness and require temporary accommodation. Suitability decisions may have a greater impact where households require access to specialist support services, legal advice, interpreters, education and community networks. *(NEC Housing (NECH) and Home Connections (HC))*

6.12 Carers:

Does your analysis indicate a disproportionate impact relating to Carers (Especially considering for age, ethnicity, language, and various intersections).	NO

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

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

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.

The available data records care leaver status. Care leavers are recognised as a vulnerable group and may lack wider family support networks available to other households. Consequently, accommodation location, accessibility of support services and proximity to professional networks may have a more significant impact on this group than on other temporary accommodation residents. *(NEC Housing (NECH) and Home Connections (HC))*

6.14 Homelessness:

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

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

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

The policy provides a structured framework for ensuring that temporary accommodation is suitable for the individual needs and circumstances of homeless households. This can have positive impacts by promoting access to safe and appropriate accommodation, taking account of factors such as disability, health needs, safeguarding concerns, children's education, caring responsibilities, employment and support networks. The policy also supports consistency and transparency in decision-making and, alongside ongoing work to increase the supply and range of temporary accommodation, should improve the Council's ability to match households with accommodation that best meets their needs.

Despite these safeguards, homeless households may still experience negative impacts where there is limited accommodation supply, particularly for larger households, disabled people requiring adapted accommodation, or households needing accommodation in specific locations. In some cases, suitable accommodation may only be available outside a household's preferred area, which can affect access to schools, employment, healthcare, support networks and community connections. While the policy seeks to minimise these impacts through individual suitability assessments, they cannot always be eliminated where accommodation availability is constrained.

(NEC Housing (NECH) and Home Connections (HC))

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.

The data identifies domestic abuse as a significant factor amongst households in temporary accommodation, particularly for women and some Black and Racially Minoritised households. Survivors may be disproportionately affected by suitability decisions because location, security measures and confidentiality are critical to their safety. The policy is therefore likely to have a greater impact on this group than on the general temporary accommodation population.

(NEC Housing (NECH) and Home Connections (HC))

6.16 Socio-economic Disadvantage:

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

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

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

The data includes deprivation indicators and relates to households experiencing homelessness and housing need. People experiencing socio-economic disadvantage are therefore likely to be disproportionately affected by the policy. Suitability decisions concerning location, transport costs, access to employment and access to essential services may have a greater impact on households with fewer financial resources.

(NEC Housing (NECH) and Home Connections (HC))

6.17 Human Rights:

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

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

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

The policy directly affects access to suitable accommodation and therefore engages rights relating to private and family life, safety, dignity and non-discrimination. The policy is intended to mitigate potential impacts through the requirement to assess individual circumstances and determine suitability on a case-by-case basis. The greatest impacts are likely to be experienced by vulnerable households where accommodation decisions affect access to support networks, education, healthcare or safeguarding arrangements.

(NEC Housing (NECH) and Home Connections (HC))

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

Potential cumulative impacts may arise where individuals belong to more than one minoritised group. For example, disabled people, Black and Racially Minoritised households, women fleeing domestic abuse, care leavers, and households with children may experience compounded impacts if accommodation is unsuitable, inaccessible or located away from support networks. The policy seeks to mitigate these risks by requiring household circumstances and individual support needs to be considered when assessing suitability. Where households have multiple needs, particularly where an out-of-area placement is being considered, the cumulative effects on disability or health needs, safety, children's education, caring responsibilities, affordability and access to support networks will be considered together within the individual suitability assessment.

Households with children are likely to experience some of the greatest impacts from accommodation location decisions due to potential effects on schooling, childcare arrangements and support networks.

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 accommodation remains suitable to individual household needs
   - Continue to undertake and record individual suitability assessments for all temporary accommodation placements, ensuring consideration is given to disability, health needs, safeguarding concerns, children's education, caring responsibilities, employment and access to support networks so that 100% of placements are subject to a suitability assessment in line with policy requirements which will be ongoing and will be owned by the Temporary Accommodation Team
   - Monitor suitability reviews, complaints and customer feedback to identify any emerging disproportionate impacts on protected groups and make service improvements where required, which will be measured through an annual review of equality impacts and identified actions incorporated into service improvement plans and will be owned by the Temporary Accommodation and Housing Options Teams

2. Increase the supply, quality and range of temporary accommodation

- Continue delivery of programmes and projects to increase the supply of temporary accommodation, including the acquisition, leasing and development of additional accommodation to reduce reliance on unsuitable or less suitable placements which will be measured by an increase in available temporary accommodation units and reduction in the use of accommodation that is further from household support networks. This will be ongoing and will be owned by the Housing Directorate.
- Continue programmes to improve the quality, suitability and diversity of temporary accommodation provision, increasing the availability of accommodation types that meet a wider range of household needs, including families, disabled people and households with specific support requirements which will be measured by an increased proportion of households accommodation in accommodation assessed as meeting their identified needs.

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.

These will be managed through the Homelessness and Rough Sleeping Action Plan as they support the priorities outlined in the strategy.

8. Outcome of your assessment

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

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

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

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

The assessment has identified that the Suitability of Temporary Accommodation Policy is likely to have a greater impact on some groups than others, particularly disabled people, women, Black and Racially Minoritised households, households with children, domestic abuse survivors and other vulnerable households who are disproportionately represented within temporary accommodation. However, these impacts are largely mitigated by the policy's requirement to assess the suitability of accommodation on an individual household basis, taking account of specific needs and circumstances, including health, disability, education, safeguarding concerns, support networks and access to services. The policy should proceed, subject to ongoing monitoring of outcomes and continued work to increase the supply, quality and range of temporary accommodation available. Increasing the availability of suitable accommodation will further strengthen the Council's ability to meet diverse household needs and reduce the likelihood of disproportionate impacts arising from limited accommodation options.

9. Publication

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

N/A

10. Directorate and Service Approval

Signatory:	**Name and Job Title:**	**Date:** DD-MMM-YY
Responsible Lead Officer:	Harry Williams, Director Housing People Services	04/09/26
Accountable Manager:	Aaron Burns, Head of Temporary & Supported Accommodation: 	2//9/26

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	01-10-2026
EDI Manager:	Lindsey Pearce	06-Oct-2026

Notes and recommendations from EDI Business Partner reviewing this assessment:

This is a comprehensive and proportionate , strong EIA, three small targeted improvements, no need for substantial reworking or additional evidence gathering.

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

Brighton & Hove City Council

Cabinet Agenda Item 92

Subject: **Expanding Council Controlled Temporary Accommodation**

Date of meeting: **12 November 2026**

Report of: **Cabinet Member for Housing**

Lead Officer: **Name: Corporate Director - Homes & Adult Social Care**

Contact Officer: **Name: Diane Hughes, Head of Housing Strategy & Supply**

Email: diane.hughes@brighton-hove.gov.uk

Ward(s) affected: (All Wards);

Key Decision: Yes

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

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 The purpose of this report is to seek Cabinet approval for the Temporary Accommodation Supply Programme, which will increase the supply of council-controlled temporary accommodation (TA) through a combination of General Fund acquisitions and long-term leasing arrangements. The programme forms part of the wider Temporary Accommodation Supply Strategy approved by Cabinet in April 2026 to transform the council's TA portfolio which supports the city's response to sustained homelessness pressures, rising TA costs and the need for long-term financial sustainability.

1.2 Brighton & Hove continues to face increasing demand for TA, constrained housing supply and reliance on costly market-based provision. The Temporary Accommodation Supply Strategy recognises that long-term sustainability requires a shift from a reactive, market-dependent approach towards a more planned portfolio of accommodation that is owned or controlled by the Council. This includes council-owned homes, long-term leased accommodation, and Supported Exempt Accommodation (SEA). This wider range of accommodation options will better meet household needs while improving value for money and reducing reliance on nightly-paid and spot-purchased accommodation.

1.3 The programme supports the Council Plan 2023-2027 outcomes to be a fair and inclusive city and a responsive and learning council with well-run services. This is further

embedded through our Housing Strategy 2024-2029 ‘Homes for Everyone’: and the Homelessness and Rough Sleeping Strategy 2025 - 2030 by increasing access to safe, suitable and sustainable accommodation, improving outcomes for homeless households and supporting the delivery of financially sustainable homelessness services.

2. Recommendations

2.1 Cabinet approves the three-year Council controlled Temporary Accommodation Supply Programme delivering up to 500 homes from April 2027. This will be delivered through a flexible mix of acquisitions and long leasing arrangements.

2.2 Cabinet agree £110,000 revenue funding to prepare the business case for the establishment of a bulk leasing programme.

2.3 Cabinet to note that a further report will be brought to a future Cabinet meeting to seek agreement to the proposed new leasing arrangements as set out at Section 6.

2.4 Cabinet delegates authority to the Corporate Director Homes & Adult Social Care to take the steps necessary to agree future acquisitions for the supply of affordable housing in consultation with:

- the Cabinet Member for Housing, for acquisitions with a value between £500k and £3 million.
- the Cabinet Member for Housing, the Cabinet Member for Finance and City Regeneration and the Director for Finance and Property, for acquisitions with a value between £3 million and £10million.

2.5 Cabinet agrees an additional HRA budget of £24.324m to support the continued buy back of properties in the financial year 2026/27.

3.0 Context and background information

The scale of the challenge

3.1 Brighton & Hove has experienced sustained growth in demand for TA. In October 2026, 2,358 households were living in TA. Actions have been taken to reduce reliance on spot-purchased, block-booked and other externally sourced accommodation with spot purchased accommodation reducing from 26% of the overall TA portfolio in January 2026 to 16% in September 2026. The steps proposed in this report will enable us to continue this reduction and bring this closer to zero over the Medium-Term Financial Plan (MTFP) period.

3.2 A proportion of the current model still relies heavily on accommodation that is:

- costly
- subject to market fluctuations
- outside the council's direct control
- increasingly difficult to secure at scale
- often seen by the occupants as insecure and so unstable.

Without continued intervention, TA demand is forecast to continue increasing and would place further pressure on service budgets and the council's ability to meet statutory homelessness duties.

3.3 The recommendations in this report form part of a wider transformation programme which is improving the financial sustainability of TA and setting a different path for the city. As reported to Cabinet in April 2026, this programme is designed to fundamentally change the shape, cost, and quality of provision. Under this approach, TA is expected to grow by around 220 households over the MTFP, resulting in total numbers of approximately 2,440 households by 2029/30 and reflecting a whole-system shift away from nightly-paid accommodation.

3.4 Achieving this change depends on coordinated action across three interconnected areas: reducing inflow through stronger prevention; accelerating move-on for households already in the system; and increasing the supply of planned, lower-cost and stable provision.

3.5 The Temporary Accommodation Supply Strategy forms a key part of the council's wider homelessness response. Alongside prevention and early intervention activities designed to reduce the number of households requiring TA, the strategy will progressively increase the proportion of self-contained, council-controlled accommodation available to the council. This will continue to reduce reliance on spot-purchased, block-booked and other externally sourced accommodation, improve quality and stability for households, and provide greater control over costs, standards and service delivery at a greater pace. The long-term ambition is to minimise reliance on spot-purchased accommodation wherever possible and replace it with planned, sustainable council-controlled provision.

Immediate action taken and the longer-term delivery plan

3.6 The council has already taken significant action to deliver a long-term plan to improve the sustainability of its TA portfolio. Immediate actions, approved through the Temporary Accommodation Sustainability Programme have included improving the effectiveness of preventing homelessness, reducing reliance on spot-purchased accommodation, increasing the use of council-controlled accommodation, implementing reforms to TA rent-setting arrangements, and developing alternative supply models including Supported Exempt Accommodation.

3.7 While recent interventions have helped stabilise the TA system and reduce reliance on some of the most expensive forms of provision, the strategy acknowledged that long-term sustainability requires a fundamental shift away from a reactive, market-dependent approach. This report supports the delivery of an element of the agreed Temporary Accommodation Supply Strategy by enabling the development of a planned and Council controlled portfolio of TA.

3.8 The Business Case to support this approach examined the options available to increase the supply of TA and reduce reliance on expensive and unsuitable placements. To support this work, the Council commissioned 31Ten to assess a range of delivery models, including direct acquisition, long-term leasing, a housing company, and hybrid approaches, to determine the most effective way of meeting future TA needs.

3.9 The review considered a range of delivery models against the Council's objectives of increasing accommodation supply, reducing costs, improving quality and strengthening control over assets and services. While housing company models offered some benefits,

the appraisal concluded that comparable or better outcomes could be achieved through direct acquisition and long-term leasing without the additional governance, compliance and operational complexity of a separate company structure.

3.10 The findings provide the foundation for this Business Case, which recommends a portfolio approach focused on direct acquisition, long-term leasing and other Council-controlled supply solutions to increase accommodation availability, improve outcomes for households and reduce financial pressures over the medium and long term.

3.11 The programme will increase the supply of council-controlled accommodation through a combination of property acquisitions and leasing arrangements. Homes secured through the programme will be held within the General Fund and used to support the council's TA and homelessness duties, reducing reliance on more expensive forms of market-based TA and improving the council's ability to meet local housing need.

3.12 Financial modelling undertaken as part of the Business Case identifies acquisitions and long-term leasing as critical mechanisms for achieving this change. The proposed mix is:

- Up to 100 acquisitions within the General Fund;
- Up to 400 10-year term leased units within the General Fund.

. However, it is intended that the programme will be flexible with the numbers to be delivered on each workstream depending on market conditions and viability. The Business Case concluded that a dual-route approach of General Fund acquisitions and General Fund long-term leasing provides the most effective balance of affordability, deliverability, flexibility, control and value for money.

The expected portfolio change in our TA supply is summarised in Table 1 below. This model was originally developed in 2025/26 and makes a series of assumptions, including on levels of demand and need, on what our accommodation portfolio might look like by the end of the MTFP. It will be reviewed annually and what is actually delivered might change depending on level of need.

Table 1

Current TA households by accommodation type 5 October 2026		**Projected TA households by accommodation type March 2030 (subject to Cabinet approvals)**	
Type of accommodation	**Number**	**Type of accommodation**	**Number**
Council controlled TA	889	Council controlled TA	1,389
Supported Exempt Accommodation	0	Supported Exempt Accommodation	500
Spot Purchase Accommodation	373	Spot Purchase Accommodation*	50
Block Booking Accommodation	563	Block Booking Accommodation	151
Current private leased	533	Current private leased	350
Total	**2,358**		**2,440**

*whilst reliance on spot purchases is not expected to form part of the programme, there may be occasions where they are necessary to secure suitable properties

3.13 The programme is one part of the wider transformation of homelessness and TA services. The council is also delivering an Early Intervention Strategy to reach residents sooner, strengthen referrals from partner services and provide advice before homelessness occurs. This includes developing the Ask and Act pilot, co-locating housing officers with services such as the DWP, and exploring predictive analytics and other data-led approaches to identify households at risk and offer timely, targeted support.

3.14 An Accelerating Move On Strategy is being developed to reduce the time households spend in temporary accommodation and increase moves into settled homes. This includes reviewing barriers to move-on, improving personalised support, strengthening routes into private rented, supported and social housing, and providing clearer information to residents about their options.

3.15 These measures sit alongside work on SEA, housing delivery, asset management and partnerships with registered providers and other organisations. Together, they are intended to reduce entries into TA, increase moves into more suitable and sustainable accommodation, release existing homes for households in urgent need and reduce reliance on expensive short-term placements.

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4.0 Supported Exempt Accommodation Delivery

4.1 In April 2026, Cabinet agreed the development of a Supported Exempt Accommodation (SEA) model as part of the Temporary Accommodation Supply Strategy. SEA provides accommodation with Care, Support and Supervision (CSS) and is a key element of reducing reliance on high-cost TA.

4.2 The approved business case envisaged delivering around 400 units over four years. Further engagement with Registered Providers, property partners and investors has identified a deliverable pathway to approximately 500 units, including up to 246 units that could be brought forward within the first year through a mix of Registered Provider provision, leasing and property conversions.

4.3 Accelerating delivery at this scale would support the council's wider Temporary Accommodation Supply Strategy by reducing reliance on high-cost nightly paid accommodation, increasing access to supported housing and improving financial sustainability. Delivering this opportunity will require flexibility to secure accommodation through acquisitions and leasing, alongside investment in operational capacity, governance and programme oversight. A further report will be brought to Cabinet seeking approval of the preferred option.

5.0 Acquisitions Programme Delivery

5.1 The acquisition programme proposed within this report is separate from, and not to replace, the council's existing Home Purchase ‘buy back’ programme which has been successful in bringing homes back to the council for both general needs and TA. From April 2027, TA acquisitions will be made through the General Fund. This provides a more suitable vehicle for TA assets, reflecting their role in meeting homelessness duties rather than supporting the council housing stock. It also enables the Council to reduce expenditure on costly nightly paid accommodation without creating additional financial

pressures within the Housing Revenue Account (HRA). This approach also helps protect the HRA's capacity to invest in existing council housing stock and future affordable housing delivery.

5.2 Market analysis undertaken as part of the Business Case assessed approximately 1,769 residential property transactions within Brighton & Hove and concluded that an acquisition programme is achievable, subject to market conditions and availability. The Council will therefore adopt a programme approach, allowing acquisition rates to vary between years and be adjusted in response to opportunities, transaction timescales and wider market conditions.

5.3 Ownership of TA assets through the General Fund will provide the Council with greater control over accommodation standards, management arrangements, geographic location and long-term costs. It will also create a long-term housing asset base capable of supporting TA requirements well beyond the initial programme period.

5.4 During the current financial year 2026/27 new TA acquisitions will continue to be made through the existing Home Purchase ‘buy back’ programme. Due to increasing demand this year an additional budget is now sought to maximise the opportunities available to the council. It is anticipated that 103 homes will be brought for TA in this financial year.

6.0 Leasing Programme Delivery

6.1 The proposed model would involve the Council entering into long-term lease arrangements, for periods exceeding ten years, with experienced leasing providers. Providers would source and manage the acquisition and refurbishment of suitable accommodation, with the Council taking nomination rights and using the properties to accommodate households owed temporary accommodation duties. Under this arrangement, households would occupy accommodation under Council TA agreements, and rents would be set in accordance with the Council's approved TA rent policy.

6.2 Long-term leasing complements the acquisition programme by increasing accommodation supply more quickly, reducing upfront capital investment requirements and providing flexibility in responding to changes in homelessness demand. The Business Case also identifies improved subsidy recovery arrangements when compared with shorter-term leasing models.

6.3 The bulk leasing model is a new delivery mechanism, for which the Council currently has limited operational experience. Additional revenue resources will be required to support market engagement activities, undertake the necessary due diligence and appraisal work, establish appropriate governance arrangements, and develop detailed proposals for consideration by Cabinet.

6.4 The Council will undertake a procurement exercise, including market engagement, to identify an appropriate long-term leasing provider/s and delivery model. The leasing programme will be structured to complement the acquisition programme, helping to maximise value for money and manage market impacts.

7.0 Analysis and consideration of alternative options

7.1 The council could decide not to increase the supply of council controlled TA. This is not recommended due to the continuing financial impact of reliance on external third party providers and the expense associated with reliance on spot purchase and block booked accommodation.

7.2 The programme of delivery could offer a different mix from the proposed 100 acquisitions and 400 leased properties. Prioritising leasing alongside targeted acquisitions allows the Council to maximise the impact of its available resources. Leasing requires substantially lower capital outlay than purchasing properties, enabling the Council to bring forward additional supply without committing significant borrowing or reducing capacity for other strategic investments. It also offers flexibility to scale provision in response to homelessness pressures and changing operational need.

8.0 Community engagement and consultation

8.1 The programme has been developed taking a One Council approach with extensive engagement across services. The objectives used in the options appraisal reflect the Council's priorities for increasing supply, improving quality, strengthening control and reducing long-term TA costs.

8.2 A successful TA supply programme should be shaped by the experiences and insights of the households it is intended to support. The Council will place tenant feedback and lived experience at the heart of programme design, helping to ensure that acquired properties reflect residents' needs in terms of location, size, quality, accessibility and access to services. Understanding what works well, and where existing temporary accommodation falls short, will enable the Council to make better investment decisions, improve outcomes for households and create accommodation that is not only cost-effective but also supports stability, wellbeing and independent living.

8.3 As the programme progresses, the Council will continue to engage with accommodation providers, housing partners and other key stakeholders to support delivery of the acquisition and long-term leasing workstreams.

9.0 Risk implications

9.1 The successful delivery of the Temporary Accommodation Supply Programme is dependent upon effective management of property supply, market, financial, operational and governance risks. The Business Case concluded that these risks are manageable through phased delivery, robust governance and ongoing monitoring. Table 2 below outlines key risks and mitigations.

Table 2

Risk description	Mitigation
Sufficient properties do not become available at the pace required to deliver the programme. Should acquisition opportunities or leasing supply fall below expected levels, the Council may	This risk will be mitigated through active pipeline management, annual review of acquisition targets, market testing of leasing providers and the use of both

remain reliant on higher-cost TA routes for longer than anticipated.	acquisition and leasing routes to diversify supply
The programme is subject to market and financial risk. Property values, leasing costs, borrowing rates, inflation, Local Housing Allowance rates and subsidy arrangements may differ from the assumptions used within the Business Case, affecting overall financial performance.	These risks will be managed through affordability thresholds, due diligence, regular financial review and ongoing monitoring of programme viability.
Homelessness demand increases beyond current forecasts, If demand exceeds assumptions, additional TA capacity may be required and anticipated savings may be delayed.	This risk will be managed through alignment with wider homelessness prevention, move-on and supported accommodation initiatives.
Operational risks include procurement legal challenges, delivery delays, insufficient staffing capacity, property condition issues, void losses, rent arrears and compliance requirements.	These risks will be managed through dedicated programme governance, appropriate resourcing, property due diligence, contract management and performance monitoring.
Governance and legal risks include programme oversight and compliance with housing, financial and procurement legislation.	Appropriate governance arrangements, programme reporting and legal oversight will be established to support delivery and ensure compliance with statutory obligations.

10.0 Equality implications

10.1 The proposed programme seeks to increase the supply of Council controlled TA and is expected to improve accommodation quality, stability and suitability for households experiencing homelessness. The programme is anticipated to have positive impacts for vulnerable households, including families with children, disabled residents and those requiring access to local support networks.

10.2 As this report seeks approval for the programme framework rather than specific operational proposals, equality impacts will continue to be assessed throughout programme development and implementation. An Equality Impact Assessment (EIA) will be completed and maintained to ensure that the Council's Public Sector Equality Duty obligations are appropriately considered and embedded within decision-making.

11.0 Financial Implications

11.1 The total projected capital commitment under the existing Home Purchase Programme in 2026/27 is £43.596m, comprising £18.550m of completed acquisitions and £25.046m of acquisitions where offers have been accepted and are progressing through conveyancing and due diligence and are expected to complete during 2026/27. Existing approved Home Purchase Programme capital resources total £19.272m, resulting in a funding requirement of £24.324m, for which approval is sought through recommendation 2.5.

11.2 The increase reflects the volume of acquisition opportunities secured during 2026/27 and the Council's decision to accelerate purchases where value for money and strategic housing objectives can be demonstrated. The programme is expected to deliver approximately 103 additional homes during 2026/27. The original approved budget was sufficient to fund approximately 26 acquisitions, with the additional budget required to complete the remaining 77 homes currently progressing through the programme. The revenue implications of borrowing have been incorporated into the HRA Business Plan and remain affordable within current financial planning assumptions.

11.3 The additional funding requested through this report relates solely to acquisitions being delivered through the approved Home Purchase Programme during 2026/27. These acquisitions will be purchased within the HRA and form part of the original programme previously approved by Cabinet. Any future acquisitions or leasing arrangements associated with the Council Controlled Temporary Accommodation Supply Programme from 2027/28 onwards will be subject to a separate business case and approval process. All acquisitions have been subject to affordability assessment, financial appraisal, due diligence and approval through the Council's established governance arrangements.

11.4 The financial case for investment is strong. The Council is currently forecast to spend approximately £16.939m net in 2026/27 on externally provided temporary accommodation, including forecast net expenditure of £5.451m on spot purchased accommodation, £9.150m on block booked accommodation and £2.338m on private sector leasing arrangements. This expenditure is paid to external landlords and accommodation providers for properties over which the Council has limited control regarding future availability, pricing and quality. The Temporary Accommodation acquisition programme forms a key part of the Council's wider transformation programme and contributes towards delivery of the approved £5.140m Temporary Accommodation savings target. Without continued investment in Council-owned supply, the Council is likely to remain exposed to significant recurring expenditure on externally provided accommodation and increasing market pressures.

11.5 By comparison, the Home Purchase Programme converts capital investment into long-term Council-owned housing assets. The programme provides an opportunity to redirect investment away from accommodation owned by third parties and into Council-owned homes, creating long-term value whilst reducing reliance on externally provided accommodation. This strengthens the Council's asset base, provides greater control over property standards and future use, reduces reliance on increasingly expensive market-based accommodation and supports the long-term financial sustainability of homelessness services. Rather than continuing to fund significant recurring payments to external providers, the Council is investing in assets that will continue to generate financial and service benefits over the long term whilst supporting the delivery of future Temporary Accommodation savings.

Name of finance officer consulted: Brian Smith/Ferrise Hall **Date consulted:** 08/10/2026

12. Legal implications

12.1 The Council has statutory duties under Part VII of the Housing Act 1996 to secure suitable accommodation for eligible homeless households. Section 206 requires local authorities to secure suitable accommodation for homeless applicants and Section 208 requires authorities, so far as reasonably practicable, to secure accommodation within

their district. The proposed acquisitions and leasing programme has been developed to support the Council in meeting these duties.

12.2 The preferred acquisition route involves the purchase of temporary accommodation through the General Fund. The full impact of the proposed acquisition programme will therefore need to be incorporated into and monitored through the General Fund Business Plan to ensure continued affordability and compliance with statutory financial requirements.

12.3 Properties acquired through the General Fund and homes secured through qualifying long-term lease arrangements will be used as temporary accommodation to discharge the Council's homelessness duties under Part VII of the Housing Act 1996. Accommodation provided pursuant to these duties does not constitute a secure tenancy under Schedule 1 to the Housing Act 1985. Occupation will therefore be provided through temporary accommodation agreements or licences to occupy, enabling the Council to retain flexibility in the management of placements and move-on arrangements.

12.4 Properties acquired or secured through leasing arrangements under the programme will be used as temporary accommodation to support the council's homelessness functions under Part 7 of the Housing Act 1996. Households placed in temporary accommodation do not occupy under secure tenancies and therefore do not have a statutory Right to Buy. Appropriate occupation arrangements will need to be maintained to ensure that the use of these properties remains consistent with their intended purpose and the applicable legal framework. Should the future use of any property change, the tenancy arrangements and any associated statutory rights would need to be considered at that time.

12.5 The long-term leasing element of the programme will require the Council to enter into lease agreements with accommodation providers. Prior to entering into any lease commitments, appropriate legal, financial and technical advice will be obtained in relation to lease structures, contractual arrangements, subsidy control requirements, accounting treatment, taxation implications, procurement including SDLT where applicable, and any other relevant legal considerations The Council has a broad range of options for discharging its homeless duties and these are complied with by leasing property.

12.6 The programme will be delivered in accordance with the Council's obligations under the Housing Act 1996, Local Government Act 2003, Local Government and Housing Act 1989. Further external legal advice is being sought to ensure compliance with the Procurement Act 2023, Subsidy Control Act 2022 and other relevant legislative and regulatory requirements. Appropriate governance arrangements, delegations and approval processes will be established through programme mobilisation to ensure acquisitions, leasing agreements and associated contractual commitments are entered into lawfully and in accordance with the Council's Constitution.

12.7 The Council must also continue to have due regard to its responsibilities under the Equality Act 2010 and the Public Sector Equality Duty. The Business Case identifies Equality Impact Assessment requirements as part of programme mobilisation and ongoing delivery arrangements to ensure equality considerations are embedded throughout implementation of the programme However as many of those housed as priority need will have one or more vulnerabilities it is likely that the Council will be enhancing provision for those with protected characteristics.

Name of lawyer consulted: Simon Court Date consulted: 07/10/26

13.0 Sustainability implications

13.1 The programme supports the Council's objective of creating a more sustainable TA system by increasing the supply of accommodation owned or controlled by the Council and reducing reliance on short-term, market-based provision.

13.2 The acquisition of long-term housing assets and the use of longer-term leasing arrangements will support improved asset management, more effective use of housing resources and greater stability for households requiring TA.

13.3 Where practicable, opportunities will be taken to improve the quality, condition and energy performance of acquired homes ensuring they meet required standards. Property surveys, refurbishment works and ongoing asset management arrangements will form part of programme delivery.

14.0 Health and Wellbeing Implications

14.1 Having poor quality, unaffordable, inappropriate or lack of housing directly impacts people's ability to maintain their health, well-being, and independence. Measures to improve housing quality, improve the environment and increase community cohesion will have a positive impact on health and contribute to tackling health inequalities.

14.2 The Health Counts 2024 survey highlighted cost of living and housing concerns for respondents. 86% of respondents were taking at least one action due to increases in the cost of living with around one in five respondents (21%) fairly or very worried about their housing conditions e.g. damp, cold, leaks etc. There are also concentrations of areas with higher levels of worries about housing conditions – 27% of those living in the most deprived areas worry compared to 10% living in the least deprived areas.

14.3 38% of respondents recorded high anxiety scores. This increased to 46% of those in the most deprived 20% of areas, compared to 29% of those in the least deprived areas. This increased significantly to 72% for respondents living in temporary or emergency accommodation. It was also identified that those who live in social housing face substantially higher health risks with regards to four key areas – disability, smoking, recent self-harm and suicide. This insight highlights the clear link between housing and wellbeing and the importance of the actions we are taking through our approach to tackle inequality.

15.0 Procurement implications

15.1 The acquisition of land and property is generally exempt from the Procurement Act 2023 as a subject-matter exemption. However, the Council will undertake appropriate procurement and market engagement activity where required to establish the long-term leasing arrangements and appoint any delivery partners, in accordance with the Procurement Act 2023 and the Council's Contract Standing Orders. Any refurbishment, repair or associated works required as part of the programme will be procured through compliant procurement processes in accordance with the Procurement Act 2023 and the Council's Contract Standing Orders.

16.0 Crime & disorder implications:

16.1 There are none arising from this report.

17.0 Conclusion

17.1 The Business Case concludes that a blended approach of acquisitions and long-term leasing through the General Fund provides the most effective and deliverable option for increasing the supply of council-controlled TA. The programme will support the Council's objectives of reducing reliance on high-cost TA, improving financial sustainability, and delivering better outcomes for homeless households.

17.2 Cabinet is therefore asked to approve the recommendations set out in this report to enable delivery of the programme which supports the wider Temporary Accommodation Supply Strategy.

Supporting Documentation

Appendices

None

Background documents

1. Temporary Accommodation – Transformation for Financial Sustainability Cabinet Report April 2026

Brighton & Hove City Council

Cabinet

Agenda Item 93

Subject: **Targeted Budget Management (TBM) 2026/27 Month 6 (September)**

Date of meeting: **Thursday, 12 November 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: No

Reason(s)

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 for noting an indication of forecast risks as at Month 6 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 £26.446m.

2.2 Cabinet notes the additional risks of £13.836m included in the table at Appendix 2 which are not included in the forecast figure above.

2.3 Cabinet notes the forecast overspend risk for the separate Housing Revenue Account (HRA), which is an overspend of £0.683m.

2.4 Cabinet notes the forecast overspend risk for the ring-fenced Dedicated Schools Grant, which is an overspend of £6.672m in-year, resulting in a cumulative deficit of £6.848m.

2.5 Cabinet notes the progress of transformation programmes shown in Appendix 4 and the delivery of savings as detailed at 3.11 and 3.12 of the report.

2.6 Cabinet notes the aged debt position shown at Appendix 3.

2.7 Cabinet notes the forecast collection fund position detailed in 3.15 and 3.16.

3 Overview

3.1 The forecast outturn position at month 6 for the current financial year 2026/27 is an overspend of £26.446m with an additional table of risks (Appendix 2) totalling £13.836m.

Directorate	TBM Budget Month 6 £'000	Forecast Outturn Month 6 £'000	Forecast Variance Month 6 £'000	Forecast Variance Month 6 %	Forecast Variance Month 5 £'000	Movement Month 5 to Month 6 £'000	Direction Of Travel ↑ / ↓
Families, Children & Wellbeing	93,343	96,571	3,228	3.5%	3,578	(350)	↑
Homes & Adult Social Care	160,867	175,700	14,833	9.2%	12,995	1,838	↓
City Operations	48,281	50,790	2,509	5.2%	2,071	438	↓
Central Hub	30,544	31,408	864	2.8%	910	(46)	↑
Sub Total	333,035	354,469	21,434	6.4%	19,554	1,880	↓
Centrally-held Budgets	16,807	21,819	5,012	29.8%	4,281	731	↓
Total General Fund	349,842	376,288	26,446	7.6%	23,835	2,611	↓

3.2 The forecast has deteriorated by £2.611m between month 5 and 6.

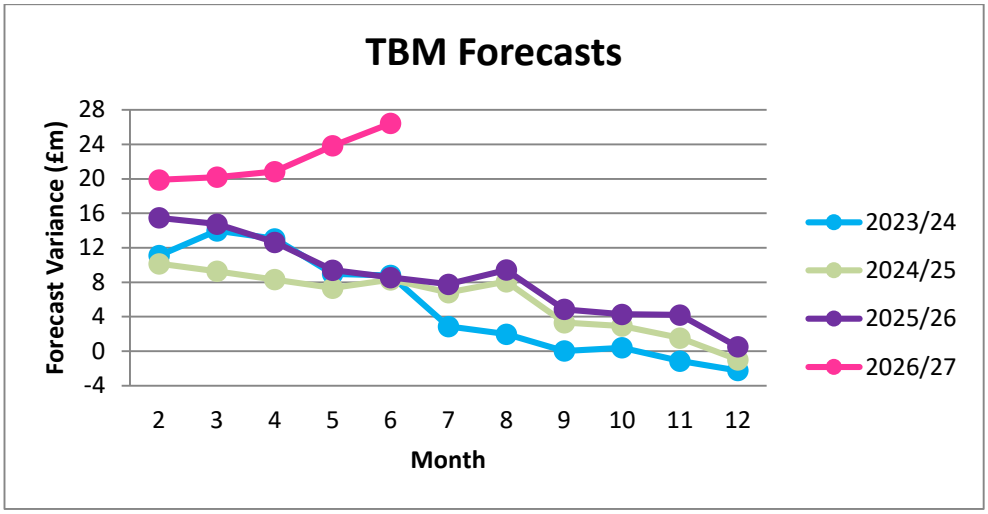
3.3 The most significant movement has been within the Adult Social Care service. This is driven by a combination of factors. Notably, there was an expectation of an increase in provider fee uplifts (£1.300m) which was previously highlighted as a risk and now has been incorporated into the main forecast. Additionally, there has been an increase in demand in terms of new client placements (£0.707m).

3.4 The council has been awarded £6.4 million of transformation grant by the Ministry of Housing, Communities and Local Government (MHCLG) to fund transformation which addresses increasing adult social care demands, homelessness and reduces pressure on temporary accommodation. This will be used as transformation funding over the next two years to improve prevention.

3.5 For the 2026/27 central Dedicated Schools Grant (DSG) there is currently a forecast in-year overspend of £6.672m. The estimated overspend of £6.672m will be an addition to the final overspend position on the central DSG from 2025/26. At the end of 2025/26 there was a net deficit on the central DSG of £1.762m, meaning the cumulative overspend forecast totals £8.434m. The council received notification in October that 90% of the 2025/26 deficit would be offset by the high needs stability grant allocation. This means the adjusted cumulative deficit after allowing for the high needs stability grant allocation of £1.586m reduces to £6.848m. The position is summarised below:

Central DSG Deficit end of 2025/26	£1.762m
In-year Central DSG Deficit 2026/27	£6.672m
Cumulative DSG Deficit	**£8.434m**
Indicative High Needs Stability Grant	(£1.586m)
Revised Cumulative DSG Deficit	**£6.848m**

3.6 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.



3.7 It's important to note that in previous years, very similar cost pressures existed but were offset by underspends in other areas and by the application of centrally held one off funding where available. The 2026/27 budget factored in a proportion of these underspends in order to balance, meaning that they are no longer available in the current year to counter the underlying pressures. The council has been managing its finances closely and continues to do so but like so many councils, the continuing increases in demand and the rising levels of complexity, and therefore cost, are overwhelming the savings being made. In addition, elements outside of the council's 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 cost reduction and financial sustainability for the future.

3.8 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.

3.9 Appendix 1 also shows the expected variances on the Housing Revenue Account (HRA) and the DSG which, while outside the reported revenue position of the General Fund are still the responsibility of the Council to manage. These are showing overspends of £0.683m and £6.848m 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, and has confirmed, subject to a final audit, that that 90% of the 2025/26 deficit would be offset by the high needs stability grant allocation. At this stage, it is not clear whether a similar arrangement will apply for central DSG deficits arising in 2026/27 and 2027/28, however government has advised support will continue and that this would follow 'an appropriate and proportionate approach' but that this would not be unlimited.

Savings & Transformation Delivery

3.10 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 the Corporate Leadership Team (CLT). An update on the current position of the projects is shown at Appendix 4.

3.11 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 3.13 outlines what each RAG colour represents.

Directorate	● £'000	● £'000	● £'000	● £'000	● £'000	Total £'000
Families, Children & Wellbeing	0	204	312	82	423	1,021
Homes & Adult Social Care	0	2,714	4,999	7,222	300	15,235
City Operations	220	493	493	2,684	68	3,958
Central Hub	0	600	175	260	10	1,045
Centrally-held Budgets	1,125	0	0	0	0	1,125
Total General Fund	1,345	4,011	5,979	10,248	801	22,384
DSG	0	0	0	0	0	0
HRA	0	0	0	0	0	0
Total Council	1,345	4,011	5,979	10,248	801	22,384

3.12 Savings in service budgets, not linked to transformation projects, are also delivering well with 78% either already delivered or strongly expected to be.

Directorate	● £'000	● £'000	● £'000	● £'000	● £'000	Total £'000
Families, Children & Wellbeing	0	100	0	968	548	1,616
Homes & Adult Social Care	0	0	0	23	0	23
City Operations	375	10	215	374	290	1,264
Central Hub	0	12	277	1,123	213	1,625
Centrally-held Budgets	0	0	450	1,550	0	2,000
Total General Fund	375	122	942	4,038	1,051	6,528
DSG	0	0	0	0	0	0
HRA	0	0	0	0	0	0
Total Council	375	122	942	4,038	1,051	6,528

3.13 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.

Treasury, Debt and Capital

3.14 The report may also include a Treasury Management update from time to time. This is required to comply with the updated Treasury Management Code which requires a minimum of quarterly reporting. Cabinet already receives mid-year and end-of-year reviews and therefore at least two additional interim

reports will be provided via an appropriate TBM report to ensure compliance with reporting requirements. A Treasury Management update is not included in this report and will be included at TBM Month 7 (October).

Collection Funds

3.15 The Council Tax Collection Fund is forecast to be in deficit by £4.500m at year end, of which the Council's share is £3.802m. This comprises a £1.172m brought-forward deficit and adverse in-year variances relating to collection performance (£1.159m), Council Tax Reduction (£0.858m), taxbase adjustments (£1.267m) and backdated prior-year changes (£2.034m), partly offset by increased Empty Property and Second Homes Premium income and lower student exemptions. The forecast remains uncertain due to operational backlogs and delays in VOA updates, which may affect collection and the timing of account adjustments. Further work is underway to assess these impacts and refine the forecast.

3.16 The Business Rates Collection Fund is forecast to be £2.178m in deficit, of which the Council's share is £1.067m, entirely relating to the 2025/26 brought-forward deficit and expected to affect funding in 2027/28 through the NNDR1 calculation. For 2026/27, the forecast assumes 100% safety-net protection and no benefit from business rates growth, pending clarity over the reformed retention system. The forecast therefore remains provisional, particularly given uncertainty around the 2026 reset, new baselines, tariff/top-up arrangements and safety-net mechanism.

3.17 The in-year collection rates for 2026/27 as at period 6 are 50.56% for Council Tax, which is 0.88% below target, and 53.5% for Business Rates which is 6.98% below target.

4 Analysis and consideration of alternative options

4.1 The forecast outturn on General Fund budgets is an overspend of £26.446m with additional risks of £13.836m. This exceeds the Council's available reserves and likely ability to mitigate and therefore will require additional Exceptional Financial Support (EFS). A request to MHCLG has been made for additional EFS to cover this and positive conversations continue.

4.2 As the recommendations within this report are for noting, no alternative options have been given consideration.

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 is required, whilst acknowledging 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, and, given inflationary pressures and demand increases, continue to expand.

Finance Officer consulted: Elizabeth Griffiths Date: 28/10/2026

7 Legal implications

7.1 This report is to note and there are therefore no direct legal implications arising from the report.

7.2 The Council is under a 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.

7.3 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 to note the risks and progress of transformation programmes will assist in the discharge of that obligation through ensuring oversight is maintained by Cabinet of the budget position.

Lawyer consulted: Elizabeth Culbert Date: 30/10/26

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 the Council's 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 available resources.

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 TBM Month 6 is a significant projected overspend driven by underlying pressures in service spending carried forward from 2025/26 and continuing into 2026/27 and increases in costs in the current year. 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 has formally been requested as a sum of up to £30m. It should be noted that this is additional borrowing, not additional funding.

12.3 The MTFS has been reforecast and includes any overspend or gap in savings delivery from the current year that will continue into coming years due to the nature of the expenditure. This will be published with the draft budget in December and gives the authority a realistic position from which to take action, increasing its focus on transformation to work to close the budget gap.

Supporting Documentation

Appendices

1. Forecast Dashboards by Service
2. Additional risks not included in the forecast
3. Aged Debt
4. Update on the progress of Transformation programmes and key risks

Family Help & Protection

Revenue Budget Summary	Month 6 Budget	Forecast Outturn	Variance	Variance	DoT
	£'000	£'000	£'000	%	To Month 5
Children in Care Placements	31,534	35,200	3,666	11.63%	↓
Disability Family Support	370	676	306	82.70%	=
Children in Care Mental Health Contract	(100)	(100)	-	0.00%	↑
Families First and Social Work	17,876	17,024	(852)	-4.77%	↑
Preventive (Section 17)	627	463	(164)	-26.16%	=
In-House Residential & Respite	3,933	4,148	215	5.47%	=
Fostering & Adoption	4,819	4,729	(90)	-1.87%	=
Other	4,784	4,935	151	3.16%	↑
Total	63,843	67,075	3,232	5.06%	↓

Key Variances

The forecast position has worsened slightly since the Month 5 report, primarily due to the continued demand for, and cost of, Children in Care placements. Although placement costs have plateaued in September, they have not reduced as hoped. The placements financial recovery measures have therefore been scaled back by £0.400m to reflect the revised cost trajectory and reduce the level of risk within the forecast. These pressures have been partially offset by an increase in Section 117 aftercare funding from the ICB, reported within "Other" above and Public Health identifying funding available for the children in care mental health contract. The forecast includes delivered savings of £1.491m.

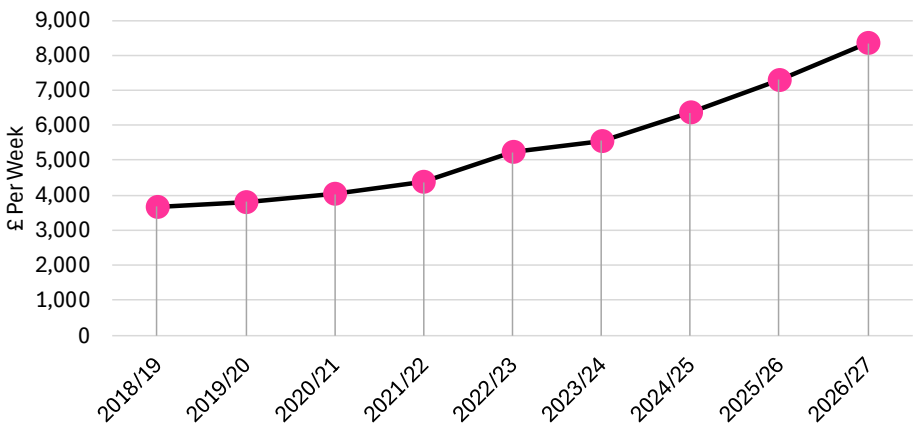
Risks & Mitigations

The Children's Placements budget remains under significant pressure, driven by increasingly complex needs, limited placement sufficiency and rising costs. A small number of children with acute safeguarding risks require highly specialised, high-cost placements, which creates an ongoing risk of further overspend. The increase in overspend crystallises risk into the forecast, and therefore the ability to deliver additional financial recovery measures has been reduced in the forecast. The risk associated with non delivery of these measures has also reduced in the risks table (Appendix 2). In addition, a further £0.400m of recovery measures has been delivered, reducing the risk reflected in the Month 6 forecast. Tight spending and recruitment controls remain in place across other services to mitigate these pressures and support the overall financial position.

Savings, Mitigations & Transformation

£'000	●	●	●	●	●	Total
Savings	-	-	-	582	142	**724**
Pressure mitigations	-	-	-	-	-	**-**
Transformation programmes	-	-	312	32	423	**767**
Total	**-**	**-**	**312**	**614**	**565**	**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.

Education, Community & Public Health

Revenue Budget Summary	Month 6 Budget £'000	Forecast Outturn £'000	Variance £'000	Variance %	DoT To Month 5
English as an Additional Language and Traveller Service	-	588	588	0.00%	↓
Public Health contribution to Schools Wellbeing	(200)	(200)	-	0.00%	↑
Schools PFI	1,209	609	(600)	-49.63%	↑
Early years & Nurseries	1,802	1,923	121	6.71%	↓
Home to School Transport	9,152	9,396	244	2.67%	↑
Libraries	4,211	4,339	128	3.04%	↑
Community Cohesion	3,011	3,011	-	0.00%	=
Other	10,315	9,830	(485)	-4.70%	↑
Total	29,500	29,496	(4)	-0.01%	↑

Key Variances

The overall forecast position has improved since the previous month, supported by public health identifying available funds to replace the shortfall in the contribution to the Schools Wellbeing service, continued improvement in the schools PFI contract and ongoing scrutiny of expenditure and recruitment. The forecast for Home to School Transport has also improved, as pupil numbers have increased by less than anticipated. However, it remains early in the academic year, and a number of outstanding applications for school transport are still subject to assessment. The position also reflects savings arising from the Families First restructure. Where posts can legitimately be funded from the grant, they have been transferred to Families First funding, generating underspends within their substantive teams.

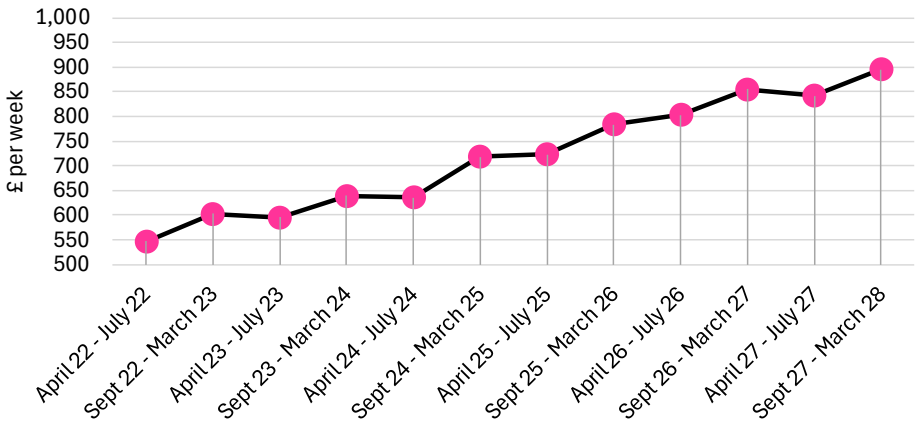
Risks & Mitigations

There remain ongoing financial risks within the Home to School Transport budget. Applications for transport continue to be received, and several pupils previously travelling in shared vehicles have required transfer to alternative routes, resulting in additional contractual costs and potential upward pressure on the unit cost of transport. The Transport team continues to manage expenditure closely through measures including the use of personal travel budgets, further review and optimisation of transport routes. In addition, work continues across the wider service to maximise the appropriate use of available funding streams.

Savings, Mitigations & Transformation

£'000	●	●	●	●	●	Total
Savings	-	100	-	386	406	**892**
Pressure mitigations	-	-	-	-	-	**-**
Transformation programmes	-	204	-	50	-	**254**
Total	**-**	**304**	**-**	**436**	**406**	**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 50% increase in the average cost.

Dedicated Schools Grant

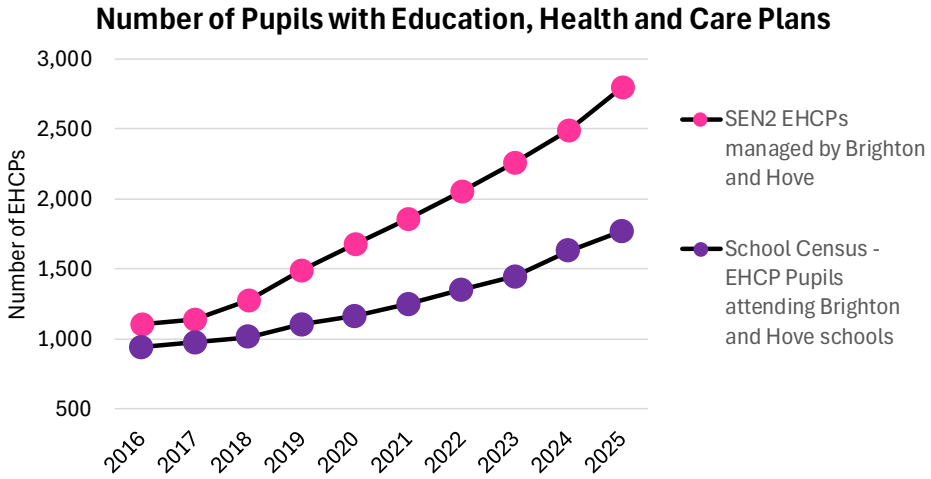
Revenue Budget Summary	Month 6 Budget	Forecast Outturn	Variance	Variance	DoT
	£'000	£'000	£'000	%	To Month 5
Individual Schools Budget	145,679	145,679	-	0.00%	=
Early Years Block	48,108	47,486	(622)	-1.29%	↑
High needs Block (Excluding delegated to schools)	43,169	50,459	7,290	16.89%	↑
Exceptions & Central Services	3,398	3,402	4	0.12%	↑
Grant Income	(240,354)	(240,354)	-	0.00%	=
Brought Forward Deficit	(1,762)	(1,586)	176	9.99%	↑
Total	(1,762)	5,086	6,848	388.65%	↑

Key Variances

The overall DSG position has improved since TBM5. This is linked to an amendment to support service recharges (£1.100m) where the adverse impact can be seen in the Centrally Held budgets, and also due to notification from government that the council will receive an indicative high needs stability grant allocation of £1.586m in relation to the cumulative deficit of £1.762m at the end of 2025/26. For 2026/27, there continue to be 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 and the council has recevied notification of an indicative grant allocation of £1.586m. At this stage, it is not clear whether a similar arrangement will apply for central DSG deficits arising in 2026/27 and 2027/28, however government has advised support will continue and that this would follow 'an appropriate and proportionate approach' but that this would not be unlimited.



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.

Adult Social Care

Revenue Budget Summary	Month 6 Budget	Forecast Outturn	Variance	Variance	DoT
	£'000	£'000	£'000	%	To Month 5
Community Care - Physical & Sensory Support	32,094	40,266	8,172	25.46%	↓
Community Care - Learning Disabilities	50,557	51,578	1,021	2.02%	↓
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	14,953	15,026	73	0.49%	↑
In-house services	11,501	12,413	912	7.93%	=
Commissioning & Partnerships	5,654	6,998	1,344	23.77%	↓
Total	139,813	154,445	14,632	10.47%	↓

Key Variances

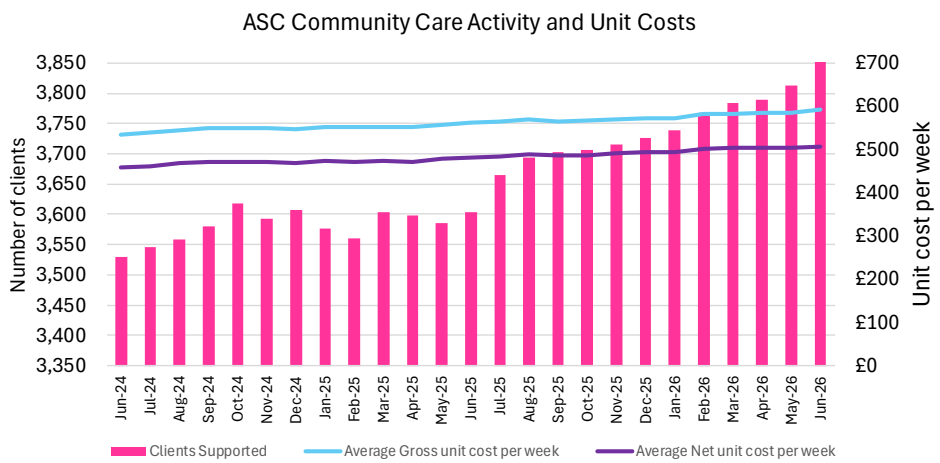
Overall the forecast overspend has increased from £12.5m in TBM5 to £14.6m for TBM6. The most significant movement £1.3m for expected provider uplifts (previously been reported as a risk). This is shown against Commissioning & Partnerships but will be allocated across Community Care lines for TBM7. Other increases include Physical & Sensory Support of £318k being the net of 16 new Nursing placements, Learning & Disabilities Supported Living costs of £389k for new placements and long term residential and nursing costs increased by £233k. Work is being completed for TBM7 to refine forecasts, ensuring that all reasonably expected activity up to the end of the year is fully included within the forecast position and that risks are appropriately balanced. The financial recovery plan for ASC 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 is subject to a deep dive to evaluate how the MHCLG investment of £6.4m can accelerate the interventions related to managing demand and containing costs.

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. Additionally, detailed validation of activity and growth assumptions (for the remainder of the year) is being completed for TBM7 to provide increased assurance on the robustness of the forecast. 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. Recommissioning community equipment is showing a pressure of £811k which may be met by either a 50:50 risk share, or fully met by BCF grant.

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

Housing General Fund

Revenue Budget Summary	Month 6 Budget	Forecast Outturn	Variance	Variance	DoT
	£'000	£'000	£'000	%	To Month 5
HPS - Temp Accommodation (TA) and Allocations	14,641	15,262	621	4.24%	↓
HPS - TA Management & Support	804	892	88	11.00%	↓
HPS - Rough Sleeper & Housing related Support	4,455	3,937	(518)	-11.63%	↑
HPS - Travellers	397	389	(8)	-1.97%	↑
H&I - Private Sector Housing	577	580	3	0.54%	=
H&I - Housing Strategy and Enabling	180	194	14	7.64%	=
Total	21,054	21,255	201	0.95%	↑

Key Variances

HGF is forecasting an overspend of £201k at TBM6, an improvement of £258k since TBM5. Homes and Investment (H&I) is forecasting a £17k overspend, consistent with TBM5. The improved position is primarily due to £250k of additional Public Health funding, which has helped offset ongoing service pressures. The Travellers Service forecast has also improved by £52k, reflecting £12k of Public Health funding and the impact of delaying recruitment until the new financial year. However, the improved position does not reflect a reduction in underlying service pressures. Demand for TA remains high, with presentations increasing from around 250 to 350 households per month during the summer months. Despite this, prevention activity remains on track, supported by initiatives including the Ask and Act pilot and co-location arrangements with the DWP. The service continues to reshape its TA portfolio to reduce reliance on higher-cost accommodation. However, demand remains high and move-on from TA continues to present a challenge.

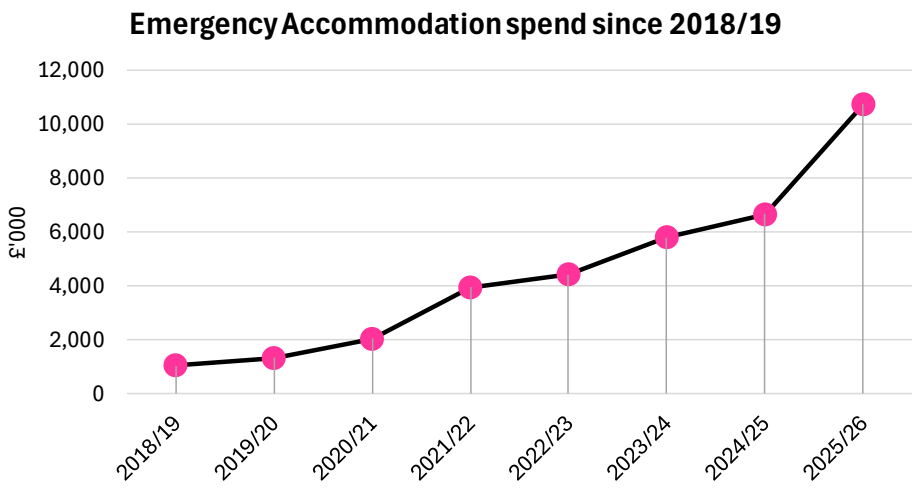
Risks & Mitigations

TA remains a significant financial risk within the Housing General Fund due to sustained homelessness demand, rising accommodation costs and Housing Benefit subsidy loss. Forecast cost pressures of £2.188m are partly offset by £1.567m of planned savings through the TA Recovery Plan, making delivery of the savings programme critical to the year-end position.

The service continues to increase lower-cost accommodation, reduce expensive placements and accelerate moves into settled housing, although move-on capacity remains constrained. Delays to the Dynamic Market and Base One programmes put delivery of planned savings at risk. Further opportunities to contain costs are being pursued, but additional delays would increase the financial pressure.

Savings, Mitigations & Transformation

£'000	●	●	●	●	●	Total
Savings	-	-	-	-	-	-
Pressure mitigations	-	-	-	-	-	-
Transformation programmes	-	901	1,567	2,375	300	**5,143**
Total	**-**	**901**	**1,567**	**2,375**	**300**	**5,143**



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.

Housing Revenue Account

Revenue Budget Summary	Month 6 Budget	Forecast Outturn	Variance	Variance	DoT
	£'000	£'000	£'000	%	To Month 5
H&I - Repairs & Maintenance	19,421	19,472	51	0.26%	↓
H&I - Housing Management & Support	6,933	6,894	(39)	-0.56%	↓
H&I - Housing Investment & Asset Management	(124)	(636)	(512)	-412.60%	↑
H&I - Housing Safety & Regulatory Compliance	3,907	4,482	575	14.73%	↓
H&I - Housing Strategy & Supply	2,134	2,141	6	0.30%	↓
HRA - Capital Financing Costs	11,424	10,524	(900)	-7.88%	↑
HRA - Direct Revenue Funding	17,014	17,262	248	1.46%	=
HPS -Tenancy Services	17,434	17,999	565	3.24%	↓
HPS - Rent & Service Charges	(78,560)	(78,241)	319	0.41%	↓
HPS - Council-owned Temporary Accommodation	417	786	369	88.58%	↑
Total	0	683	683	0.00%	↑

Key Variances

The HRA is forecasting an overspend of £683k at TBM6, an improvement of £462k since TBM5. The improved position is largely due to a £900k favourable variance in capital financing costs, reflecting borrowing being undertaken later than originally assumed and at lower rates than budgeted. The forecast has also improved by £179k within Council-Owned Temporary Accommodation, reflecting additional rental income and ongoing review of Temporary Accommodation repairs costs.

Partly offsetting these improvements are continued pressures within housing safety and regulatory compliance, including fire safety and waking watch costs, together with ongoing disrepair expenditure. The forecast also reflects changes in the use of HRA stock for Temporary Accommodation and associated budget realignments between repairs and Temporary Accommodation budgets.

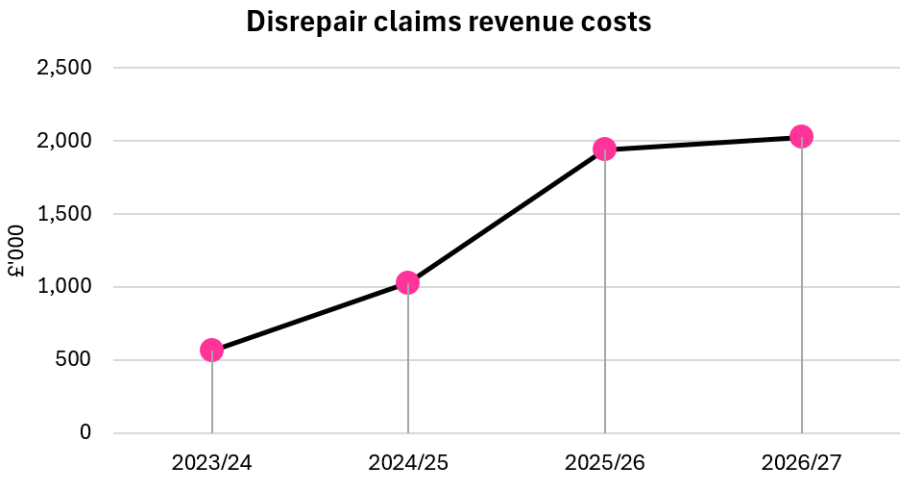
The HRA continues to support delivery of key housing priorities, including building safety programmes, stock investment activity and the Home Purchase Programme, with 52 properties acquired by the end of September and further acquisitions progressing through the programme.

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, contributing to the long-term sustainability of the HRA.

The HRA continues to face significant financial risks from disrepair activity, housing safety and regulatory compliance requirements, responsive repairs demand and major investment programmes. Whilst the forecast position has improved, it remains dependent on the delivery of planned income, savings and favourable capital financing assumptions.

Work continues to mitigate these pressures through proactive management of disrepair claims, review of Temporary Accommodation cost recovery arrangements, and progression of key building and fire safety programmes. The forecast also assumes eligible fire and building safety costs can be capitalised where appropriate, while the timely removal of waking watch arrangements remains important in limiting future cost pressures. The service continues to monitor borrowing requirements, compliance expenditure and programme delivery to maintain financial sustainability whilst continuing to invest in the safety, quality and maintenance of council homes.



This shows growth in revenue costs for disrepair claims, covering legal and professional fees and compensation. Costs of the disrepair works are charged to capital, given the nature of the works undertaken.

City Operations Expenditure

Revenue Budget Summary	Month 6 Budget	Forecast Outturn	Variance	Variance	DoT
	£'000	£'000	£'000	%	To Month 5
City Infrastructure	47,013	48,146	1,133	2.41%	↑
Environment & Leisure	51,935	52,431	496	0.96%	↑
Place	17,272	18,605	1,333	7.72%	↓
Digital Innovation	10,551	9,575	(976)	-9.25%	↓
Total	126,771	128,757	1,986	1.57%	↓

Key Variances

The Month 6 review identified a number of minor forecast changes across services which broadly offset, resulting in a small net movement. Key changes include making a previously fixed-term Events Spaces post permanent to support delivery of the MTFS income strategy, and additional agency costs within Building Control to maintain regulatory compliance and service resilience.

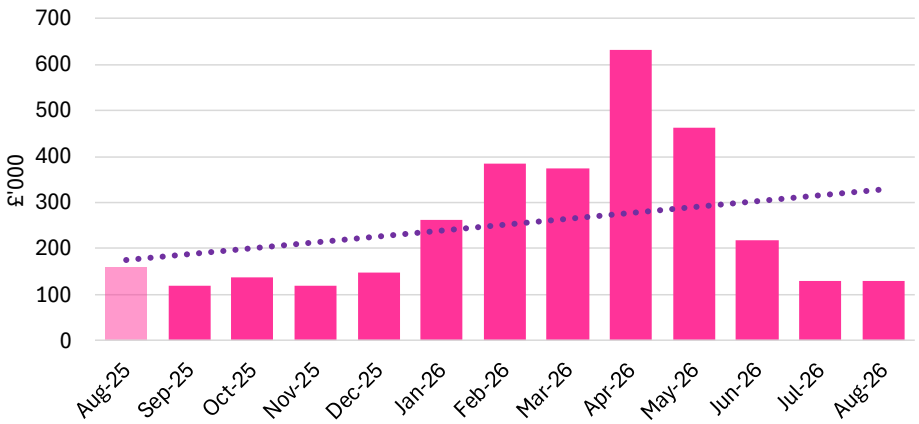
Risks & Mitigations

Previously reported risks remain and continue to be closely monitored. The Concessionary Fares forecast has increased from £0.257m to £0.365m following Compass Travel bus company's move to a claims-based arrangement. Other risks (which are included within the core forecast due to likelihood of occurance), include additional arboriculture disease works, increased collection resources, continued agency expenditure, ageing fleet hire costs and the absence of carry-forward funding for project resources. Highways repair costs may also increase, particularly if adverse winter weather causes further deterioration. In-year mitigation options are limited. The 2027/28 budget-setting process therefore includes pressure funding requests totalling £4m for the ongoing Concessionary Fares and Highways Maintenance pressures.

Savings, Mitigations & Transformation

£'000	●	●	●	●	●	Total
Savings	375	10	215	253	290	**1,143**
Pressure mitigations	-	-	-	-	-	**-**
Transformation programmes	-	60	50	-	60	**170**
Total	**375**	**70**	**265**	**253**	**350**	**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.

City Operations Income

Revenue Budget Summary	Month 6 Budget	Forecast Outturn	Variance	Variance	DoT
	£'000	£'000	£'000	%	To Month 5
City Infrastructure	(53,347)	(52,948)	399	0.75%	↓
Environment & Leisure	(11,567)	(10,652)	915	7.91%	↓
Place	(13,396)	(14,667)	(1,271)	-9.49%	↑
Digital Innovation	(180)	300	480	266.67%	↑
Total	(78,490)	(77,967)	523	0.67%	↓

Key Variances

The forecast has been updated to reflect the realignment of garden waste contracts, improving alignment with service delivery arrangements while maximising the level of income generated by the service. This is not expected to have an impact on future years income.

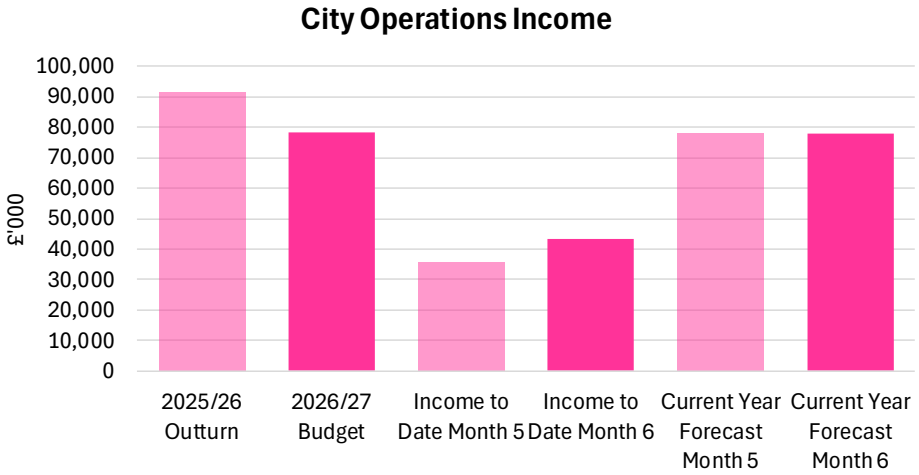
A deterioration in forecast on-street parking income has been offset by improved income across other City Infrastructure services and Land Charges.

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	443	2,684	8	**3,788**
Total	**220**	**433**	**443**	**2,805**	**8**	**3,909**



City Operations has received £43.424m of income to Month 6, up from £35.874m at Month 5. This represents 55% of the £77.967m forecast outturn, compared with 45% last month. The forecast is £0.091m lower than at Month 5 and £0.524m below the £78.491m budget. Overall, income collection remains broadly on track at Month 6.

Central Hub

Revenue Budget Summary	Month 6 Budget £'000	Forecast Outturn £'000	Variance £'000	Variance %	DoT To Month 5
Cabinet Office	1,189	1,290	101	8.49%	=
Corporate Leadership Office	1,107	1,107	-	0.00%	=
Finance & WRBS	10,938	11,153	215	1.97%	↑
Property Estates	(4,876)	(3,735)	1,141	23.40%	↓
Property Other	9,760	9,236	(524)	-5.37%	↓
Governance & Law	5,195	4,989	(206)	-3.97%	↓
People & Innovation	6,160	6,297	137	2.22%	↑
Contribution to Orbis	1,071	1,071	-	0.00%	=
Total	30,544	31,408	864	2.83%	↑

Key Variances

The Directorate's position improved by £0.176m at TBM6, driven by reduced forecast expenditure within Welfare Revenues & Business Support following a grant forecast review, and an improvement in Inclusion, Learning and Organisational Development from a £0.063m overspend to a £0.051m underspend. This was partly offset by ongoing pressures within Strategic Communications and Engagement (£0.221m), although the position improved following the transfer of redundancy costs to the Corporate Office.

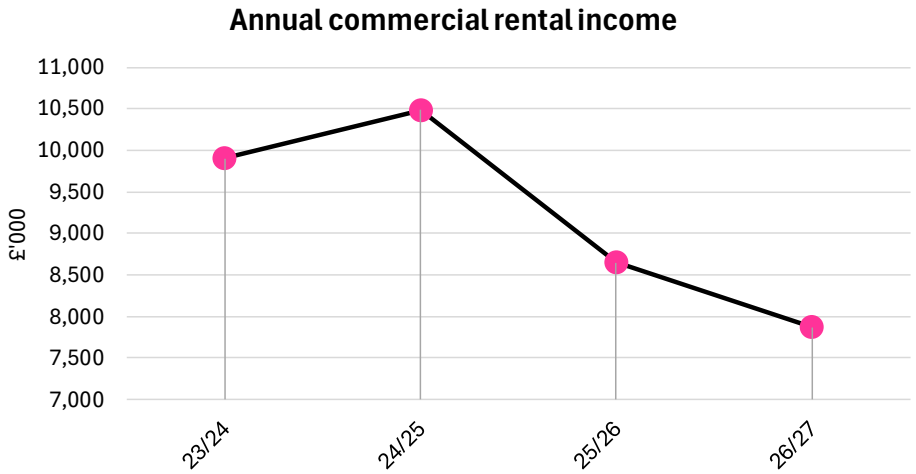
Property Services remains the largest pressure, reporting a £1.071m overspend, largely due to rental income shortfalls resulting from the budget not being adjusted to reflect asset disposals rather than rental income generation, alongside vacant property costs, wider estate operational pressures and an income accrual adjustment. This is partly offset by a £0.286m income overachievement in Building Surveying from increased SEND and direct commission project activity.

Risks & Mitigations

There have been no significant changes to the directorate's underlying risks. Key pressures remain within the Central Hub, particularly across Property, WRBS and enabling services. Property budgets continue to be affected by rising maintenance and landlord costs associated with vacant properties and unforeseen repairs. The principal financial risks are ongoing rental income shortfalls and reliance on additional Building Surveying income and new project activity to offset wider budget pressures. Mitigating action includes Central Hub programmes to improve corporate systems and reduce reliance on agency staffing, a key driver of the overspend. The 2027/28 budget-setting process is also addressing rental income shortfalls through a request for additional pressure funding to align budgets more closely with actual activity.

Savings, Mitigations & Transformation

£'000	●	●	●	●	●	Total
Savings	-	12	277	1,123	213	**1,625**
Pressure mitigations	-	-	-	-	-	**-**
Transformation programmes	-	600	175	260	10	**1,045**
Total	**-**	**612**	**452**	**1,383**	**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.

Centrally-held Budgets

Revenue Budget Summary	Month 6 Budget	Forecast Outturn	Variance	Variance	DoT
	£'000	£'000	£'000	%	To Month 5
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	3,099	-	0.00%	↑
Other Corporate Items	6,897	11,302	4,405	63.87%	↓
Total	16,807	21,819	5,012	29.82%	↓

Key Variances

In TBM6, the Centrally Held budget forecast has deteriorated by £0.731m. The primary driver for this change is the crystallisation of the risk reported in TBM Month 5 (£1.100m) in the amendment to recharging support service costs to the Dedicated Schools Grant. This ongoing pressure will impact on future years also.

This is partially offset by the removal of a pressure on the Housing Benefit Subsidy budget (-£0.421m). The Subsidy Loss has improved as a result of a favourable change over the financial year to date between categories of where we receive 0% subsidy to those where we receive 60%.

Risks & Mitigations

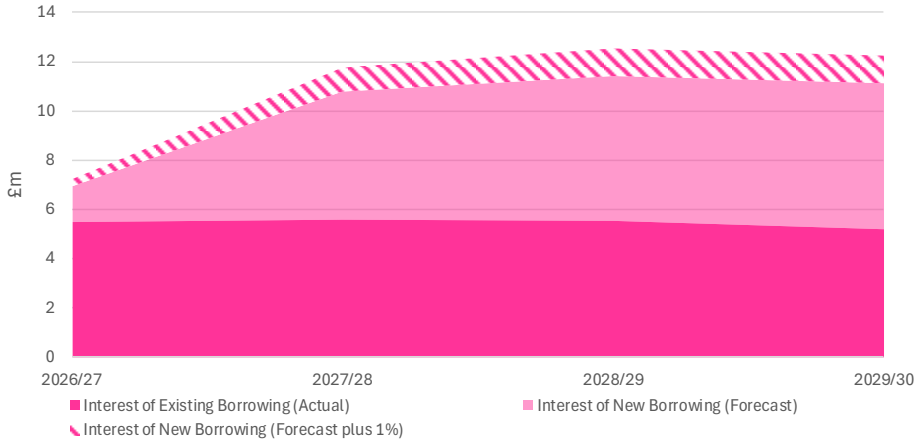
There have not been any significant changes to the underlying risks within the centrally held budgets. Work continues to mitigate Housing Benefit Subsidy Loss further, and the achievement of this may allow an underspend to come forward in this area.

The Financing Costs budget is prepared with the council's treasury advisor's forecast of interest rates, which predicts one base rate rise before the end of the financial year. However, market data implies markets are anticipating two increases in the Bank of England Base Rate over the same period (see graph below). There is therefore a risk of an increase in the council's borrowing costs above what is already allowed for. This will be monitored closely over the coming weeks, with appropriate borrowing decisions being undertaken in line with the council's Treasury Management strategy.

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**

Interest on General Fund Borrowing



The graph shows the cost on interest on borrowing fo the existing portfolio and new expected borrowing based on current forecasts.

The striped shaded area shows the additoinal cost to revenue if interest rates were to increase by 1% above current forecasts

Area	Risk Month 6 £'000	Explanation of Key Risks
Family Help & protection	200	Risk that financial recovery measures will not be realised in demand led budgets due to factors beyond the control of the service.
Total Families, Children & Wellbeing	**200**	
Adult Social Care - Provider fee negotiations	449	Risk of provider fee negotiations exceeding budget: £2.322m claims received, £0.573m has been agreed and a further £1.3m is expected to be agreed. Both are included in the budget forecast.
ASC (cashable) savings still to be achieved	700	From the Savings and Efficiency workstream (Amber/Red RAG), of which £0.300m relates to Brickfields and £0.400m relates to Wellington House.
ASC pressure mitigations (cost avoidance) still to be achieved	2,580	From the Savings and Efficiency workstream (Amber/Red RAG), of which £0.830 relates to targeted reviews and £1.75m relates to provider fee uplifts.
ASC Transformation projects still to be achieved	1,942	From the Savings and Efficiency workstream (Amber/Red RAG), all which £1.704m relates to reablement and demand management, including signposting
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	2,468	Risk of anticipated savings not reducing forecast spend due to increasing demand (Amber and red savings tracker TBM6)
Community Equipment Service	406	Risk that the potential £0.811m pressure on the service is not fully met by the Better Care Fund and therefore 50% is covered by the Council.
Fuel prices and Utility costs	28	The projected risk reflects general fund costs only
Total Homes & Adult Social Care	**12,556**	
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**	
Total General Fund	**13,836**	

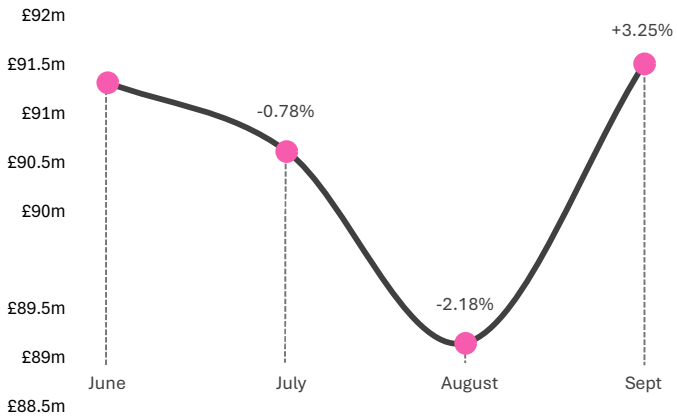
Corporate debt

Age of debt in years (as of 30 September 2026)

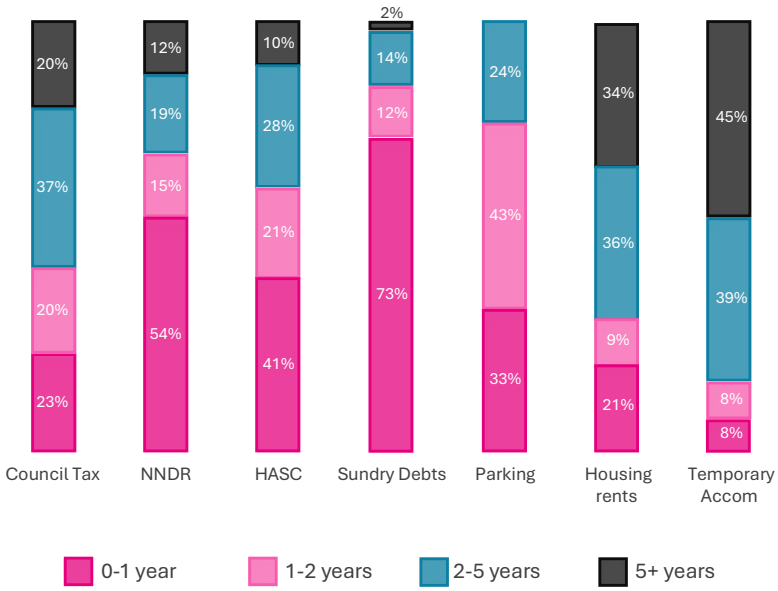
HUB	Total debt	0 - 1	1 - 2	2 - 3	3 - 4	4 - 5	5 - 6	6 - 7	7+
[1] Housing Benefits	£5,794,751.00	-	-	-	-	-	-	-	-
Council Tax	£34,099,542.00	£7,800,379.00	£6,753,438.00	£6,424,525.00	£3,564,409.00	£2,774,388.00	£3,668,553.00	£1,046,022.00	£2,067,828.00
NNDR	£7,013,713.00	£3,804,053.00	£1,042,648.00	£649,357.00	£421,382.00	£230,905.00	£398,927.00	£91,825.00	£374,616.00
Adult Social Care	£18,359,207.00	£7,462,511.00	£3,868,622.00	£2,542,715.00	£1,840,127.00	£811,219.00	£598,371.00	£291,103.00	£1,006,279.00
Sundry Debts	£6,681,015.00	£4,875,074,00	£786,880.00	£688,984.00	£131,067.00	£85,174.00	£54,018.00	£167,136.00	-£95,827.00
Parking	£4,441,451.00	£1,481,065.00	£1,904,417.00	£627,962.00	£388,723.00	£39,284.00			
[1] Leaseholders	£4,551,177.00	-	-	-	-	-	-	-	-
Housing rents	£7,412,053.00	£1,579,729.00	£683,103.00	£961,437.00	£922,831.00	£775,303.00	£238,348.00	£167,033.00	£2,084,269.00
Temporary Accom	£3,175,361.00	£259,393.00	£245,908.00	£434,690.00	£310,617.00	£501,116.00	£239,124.00	£249,913.00	£934,600.00
Total	£91,528,271.00	£27,262,203.00	£15,285,016.00	£12,329,670.00	£7,579,156.00	£5,217,369.00	£5,197,341.00	£2,013,032.00	£6,371,765.00

Total debt over time: June to September 2026

The change in debt levels between August to September is as a result of a combination of factors including annual leaseholder billing cycle timing.



Age of debt by service (as of September 2026)



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

Innovation & Transformation Portfolio Savings Dashboard – TBM6:

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 show 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 (ASC) Transformation	£23.592m	Green	Amber	Provider fee uplift savings will not be fully realised, this is reflected in the TBM6 report. The cost avoidance target re managing demand at the front door of ASC has been met and therefore the overspend in ASC reflects the additional demand for services and complexity of need that continues to increase.
Families, Children & Wellbeing Transformation	£6.875m	Blue	Amber	Early Help savings for 2026/27 have shifted from green to amber due to increasing numbers of children in care. Home to School Transport still red, although position may be improving slightly.
Homes & Homelessness	£10.587m	Amber	Amber	The Dynamic Market procurement is delayed until December - external support commissioned. Increased demand for services continued over the summer.
Procurement, Commissioning & Contract Management	£4m	N/a	Red	Capacity remains the key issue but funding for additional resource has been agreed in order to progress the work started by the team. First savings of £1m are budgeted in 2027/28.
Income & Commercial-isation	£10.213m	Green	Amber	Key dependencies remain organisational capacity, procurement and digital delivery resources. Focus is on accelerating implementation, recruiting delivery capacity and converting pipeline opportunities into recurring income.
Asset Strategy (operational)	£3.023m	Red	Red	Importance of planning further in advance to under-stand impacts upon staff locations has been high-lighted following decision to close Wellington House.
Asset Strategy (capital target, not included in the total of £74.4m)	£56.384m	Amber	Amber	Work continues to complete disposal of Barts. Meetings planned with Corporate Directors to explain how the operational review might impact their services; review predicated on capacity being available at Hove Town Hall, which has been reviewed following a fire risk assessment.
Organisational Transformation	£7.21m	Grey	Red	Engagement with services in diagnostics exercise is key to ensure meaningful data and for proposals developed. Important to understand intersections with other strategic programmes.
Digital Innovation & Technology	£8.914m	N/a	Amber	Turbocharging Innovation programme continues to develop business cases, savings being reprojected and lessons learned. Turbocharging Systems programme prioritising Council Tax and FOI/SARs. Consultant appointed to review and develop plan for Corporate Systems Improvement programme.

Brighton & Hove City Council

Cabinet Agenda Item 94

Subject: **Large Panel System Housing Masterplan and Land Assembly**

Date of meeting: **Thursday, 12 November 2026**

Report of: **Cabinet Member for Housing**

Lead Officer: **Name: Corporate Director Homes & Adult Social Care**

Contact Officer: **Name: Chantelle Barker**

Email: chantelle.barker@brighton-hove.gov.uk

Ward(s) affected: (All Wards); with specific impact in Hollingdean & Fiveways, Kemptown, and Whitehawk & Marina

Key Decision: Yes

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

For General Release

1. Purpose of the report and policy context

1.1 This report follows Cabinet's decision on 19 March 2026 to approve in principle the option to demolish and redevelop the eight Large Panel System (LPS) blocks at St James's House, Nettleton Court, Dudeney Lodge, Falcon Court, Heron Court, Kestrel Court, Kingfisher Court, and Swallow Court.

1.2 Cabinet at its meeting on 19th March 2026 authorised the service of the Initial Demolition Notices (IDN) for all eight blocks in accordance with schedule 5A of the Housing Act 1985 delegating authority to the Corporate Director Homes and Adult Social Care to determine the timing and service of the notices. This report provides an update on the service of the IDN.

1.3 March 2026 Cabinet agreed for the Corporate Director Homes and Adult Social Care to develop an offer for the provision of lease/property swaps for resident leaseholders of the eight blocks who are experiencing financial hardship and unable to purchase an alternative property on the open market and seek approval for a 'lease swap' option at a future Cabinet. This report provides an update that the 'lease swap' option is now recommended to be a bespoke 'leaseholder assistance' offer for a limited number of resident leaseholders experiencing exceptional hardship circumstances and/or are vulnerable.

1.4 This report updates Cabinet on the progress of the LPS Redevelopment Programme and seeks approvals required to progress resident rehousing, reduce vacant possession risk, undertake land assembly, and related programme activity to maximise the redevelopment opportunities.

1.5 The recommendations are intended to provide clarity for the building owners and occupants, reduce vacant possession and delivery risks, and support the progression of the redevelopment proposals.

1.6 This report accords with the Council Plan 2023-2027, specifically:

Outcome 2: A Fair and Inclusive City

- *Homes for everyone*

1. Improve housing quality
2. Increase housing supply

2. Recommendations

Cabinet is asked to:

2.1 Note the progress of the LPS Redevelopment Programme, including the service of Initial Demolition Notices on all secure council tenants in the eight LPS blocks; St James's House, Nettleton Court, Dudeney Lodge, Falcon Court, Heron Court, Kestrel Court, Kingfisher Court, and Swallow Court, pursuant to paragraph 4(2) of Schedule 5A of the Housing Act 1985 (as amended).

2.2 Note the suspension of letting secure tenancies at the eight LPS blocks; St James's House, Nettleton Court, Dudeney Lodge, Falcon Court, Heron Court, Kestrel Court, Kingfisher Court, and Swallow Court.

2.3 Note the temporary use of void properties in the LPS buildings as Temporary Accommodation (TA) and agree to delegate authority to the Corporate Director Homes & Adult Social Care in consultation with the Cabinet Member for Housing to determine when new TA lettings should cease, and to determine the timing of service of the Notice to Quit (NTQ) on TA households, or any other process required to enable vacant possession of the properties where needed.

2.4 Agree to delegate authority to the Corporate Director Homes and Adult in consultation with the Cabinet Member for Housing Social Care to determine when to serve the Notice of Seeking Possession (NOSP) on the secure council tenants.

2.5 Approve the suggested amendments to the sections of the Local Lettings Plan for Large Panel System (LPS) blocks and the Rehousing Policy – Regeneration Schemes as set out at paragraphs 4.2 and 4.3 of this report and agree to delegate authority to the Corporate Director Homes and Adult Social Care in consultation with the Cabinet Member for Housing to create a policy for Secure Council Tenants with an Interest in Returning and return to

a future Cabinet to approve the policy. Also, to include any properties not previously covered by the LPS Local Lettings Plan in the Plan following the extended redevelopment footprint and update any other aspects of the Rehousing Policy – Regeneration Schemes or LPS Local Lettings Plan as may be required.

2.6 Agree to delegate authority to the Corporate Director Homes and Adult Social Care in consultation with the Cabinet Member for Housing of a 'leaseholder assistance' bespoke offer and a budget of £0.1m where required for specific exceptional cases of resident leaseholder financial hardship and/or vulnerability requiring support.

2.7 Note that the intention is to permanently close the Chapel Street public pay-and-display car park beneath St. James' House, subject to the outcome of the relevant Traffic Regulation Order process.

2.8 Agree to delegate authority to the Corporate Director Homes & Adult Social Care in consultation with the Cabinet Member for Housing to consider Section 105 of Housing Act 1985 consultation responses from consultees of the surrounding land and council owned property potentially to be included in the extended LPS development proposal areas, including for demolition/construction site set up, opportunities for phased redevelopment and landscaping.

2.9 Note the opportunity to extend the redevelopment area for the Dudeney and Nettleton site (extending beyond just the LPS blocks and land) and agree to delegate authority to the Corporate Director Homes & Adult Social Care in consultation with the Cabinet Member for Housing to consider land assembly requirements and approve the acquisition of property where required in accordance with Part 1 and Part 2 reports.

2.10 Note the Section 105 of the Housing Act 1985 consultation response from the secure tenant of the proposed additional land assembly (Hollingdean) set out in the part 2 report and approve that the secure council tenant is to be given the provisions of the Rehousing Policy – Regeneration Schemes and LPS Local Lettings Plan

2.11 Approve the service of an Initial Demolition Notice to any council owned property with secure council tenants in the extended redevelopment area referred to at recommendation 2.9.

2.12 Approve an additional capital budget of £1.46m to support staff resourcing, land assembly costs, home loss and disturbance costs for secure council tenants of properties in the extended redevelopment areas, 'leaseholder assistance' contingency, legal costs and the appointment of an Independent Tenant and Leaseholder Adviser for the residents of the three LPS redevelopment areas.

2.13 Approve the progression of an optimized approach to the design of the redevelopment proposals and masterplans.

3. Context and background information

3.1 The Estate Renewal LPS team have made progress on the re-housing of secure tenants, leaseholder acquisitions, demolition logistics planning, and the assessment of delivery routes, across the three redevelopment areas.

3.2 In 19 March 2026 Cabinet approved the service of Initial Demolition Notices (IDN) to secure tenants of the eight blocks, delegating the timing of service to the Corporate Director of Homes and Adult Social Care. Following a pre-engagement period since March 2026, with door knocking, one-to-one visits, Community Days, drop-in's and newsletters, the IDNs were served on all secure council tenants on 8 October 2026. Leaseholders were provided with a copy for information. The wider community of residents, schools and businesses within a 300m radius of the redevelopment sites were sent a newsletter updating on the meaning of the IDN, next steps, and to advise that the council will engage with them on the development proposals as they emerge. Stakeholders including Ward Councillors, local support services, the Building Safety Regulator, the Regulator of Social Housing, and Homes England were informed.

3.3 Serving of the IDNs is a formal legal step confirming the council's intention to demolish the existing LPS blocks to make way for redevelopment. The council has explained that demolition is not imminent, but all secure council tenants are encouraged to register on Homemove. Support is being provided to residents. The IDNs are valid for up to seven years. Within that time the council will need to have advanced redevelopment plans to planning permission and got a date for the demolition to serve the Final Demolition Notice. The budget request for additional staff resource is required to support this process, including provision of suitable support for residents.

3.4 Current engagement activity is concentrated on the secure council tenants who are not currently registered on Homemove to identify what assistance and support can be provided to them.

3.5 The service of an IDN acts to suspend any live Right to Buy applications, and prevents new applications being processed and suspends mutual exchanges. At the point of service of the IDN there was one live Right to Buy application. Officers are engaged with this secure council tenant to support them and review their housing options. The tenant has been made aware that they have three months to submit evidence of their reasonable expenses to be compensated by the council.

3.6 Following the suspension of Right to Buy, the Home Ownership Pact Pilot approved at 19th March 2026 Cabinet, has been approved to proceed under delegated authority by the Corporate Director Homes and Adult Social Care and Officers are in contact with the secure council tenants who have expressed an interest.

3.7 Cabinet is asked to note the challenging external industry conditions and as such note the requirement for an optimised approach to the development proposals and masterplanning work, such as enabling the most optimum viable housing mix and bedroom mix and considering a programme

approach to the redevelopment areas and subsidy requirement to enable the delivery of social rented homes. A further Cabinet report in early 2027 will consider redevelopment delivery routes and an updated financial viability position, with sensitivities.

4. Returning to the Redevelopment Homes Options for Secure Tenants

4.1 There is a section on the 'Right to Return' in both the 'Local Lettings Plan for Large Panel System (LPS) blocks' and the 'Rehousing Policy – Regeneration Schemes, both agreed at Cabinet on 19 March 2026. They note the council's commitment to helping those who wish to remain in the area or return to the renewal estate where possible.

4.2 There is no legal requirement or statutory duty for the council to give secure council tenants the option to return to the redeveloped site, and there are additional factors the council needs to consider. It is therefore proposed that the two documents referred to in 4.1 are updated with delegated approval from the Corporate Director Homes and Adult Social Care in consultation with the Cabinet Member of Housing, including a change from the term 'Right to Return' to 'Interest in Returning', as well as including conditions as set out in 4.3 below.

4.3 Expressing a desire to return does not confer a legal duty to the council or give the tenant any rights. The council will endeavor to support the tenant to return to the development where possible, but it is proposed that it will be subject to an expanded list of criteria, exceptions and conditions as follows (noting that in exceptional circumstances discretion may be used):

- If the secure council tenant has been permanently rehoused and chooses to return to the redeveloped site, they will not receive additional financial assistance or compensation. Secure council tenants are eligible for Statutory Homeloss and Disturbance Payments on their first move to new permanent housing, but are not eligible for any financial compensation in the form of Homeloss and Disturbance Payment compensation should they voluntarily choose to move a second time to return to the new development.

- In the event of a phased development there will need to be sufficient properties built to create enough movement to allow future phases to be rehoused on the main redevelopment site. As such, in a phased regeneration development programme, priority for the new build homes built on the site will be given to the secure council tenants on the redevelopment site that have not yet been rehoused, before any permanently re-housed secure council tenants can bid on a new build home on the redevelopment site. The LPS priority for bidding will only be applicable for secure council tenants that have not had the first rehousing permanent move.

- The secure council tenant must have been residing in the property in which they currently hold a tenancy as their only and principal home at the time of the first move and at the time of returning to the redevelopment site be a secure tenant.

- The property the secure tenant moved into at the time of their permanent move must not have been extensively adapted to meet the specific needs of the tenant. The suitability, accessibility and implications of leaving an adapted property will be individually assessed.

- the secure council tenant either has no rent arrears at the time they choose to return to the redevelopment site or has made satisfactory arrangements to pay off the arrears and has been adhering to the arrangement for the six months prior to the return to the redevelopment site, taking account of the individual circumstances of the case.

- the secure council tenant must not have any substantiated tenancy breaches relating to ASB or cases that were live with tenancy enforcement actions in the six months prior to bidding to the return to the redevelopment site.

- the 'like for like' number of bedrooms at the time of the first permanent move will remain the 'like for like' offer if the secure tenant chooses to return. It is expected that where a household currently has an assessed greater bedroom need and is eligible to bid for a larger property this would be out of scope of an interest to return. In the event that at the time of completion of the redevelopment works, a household at that point has an assessed need for a larger sized property, would be within scope, but will depend on the availability of suitable properties.

- If a secure council tenant is offered a home in the new build properties, the rent might be higher than the property they are moving from, so they will need to demonstrate that the new property is affordable and therefore suitable through council assessments.

- all matters related to tenancy disputes or discrepancies should be resolved prior to seeking to bid to be housed on the new build property in the redeveloped area, for instance Property Adjustment Orders following relationship breakdown must be resolved before a return to an LPS property can be facilitated.

- Residents occupying Temporary Accommodation will not be offered the ability to return.

5. Leaseholders Assistance option

5.1 The March 2026 Cabinet requested that a 'lease swap' offer is developed and brought back to Cabinet for approval. A 'lease swap' option has been investigated and it has identified a wider support offer to provide financial hardship and/or vulnerability needs to be considered. As such, a 'leaseholder assistance' option is required, rather than a 'lease swap' option.

5.2 Lease swap offers have operated in Hackney, Havering, Brent and Camden, and Westminster as part of estate regeneration schemes, although this primarily relates to facilitating phased redevelopment programmes. Best practice including advice from these local authorities has been sought and considered when exploring the options for resident leaseholders.

5.3 ‘Leaseholder assistance’ options for resident leaseholders can consider those whose financial circumstances mean they are unable to purchase on the open market and are in financial hardship, and/or have a vulnerability that requires additional assistance and support, and a bespoke offer.

5.4 Financial hardship in these circumstances is defined by an inability due to financial circumstances to purchase an alternative property. An assessment by an independent financial advisor will be completed and the council will be advised on the outcome of the assessment. A case-by-case review will be conducted based on individual circumstances.

5.5 There are currently eight resident leaseholders who have not progressed to conveyancing. When discussing leaseholder options in the consultation that was considered by March 2026 Cabinet, two resident leaseholders expressed an interest in a ‘lease swap’. However, no independent financial assessment has been completed to date to confirm financial hardship for any of the resident leaseholders. The ‘leaseholder assistance’ option requires a case-by-case review of financial hardship eligibility and/or vulnerability to develop a bespoke individual arrangement. It is likely that a limited number of resident leaseholders would meet the requirements for a lease swap offer, and as such Cabinet are asked to delegate authority to the Corporate Director Homes and Adult Social Care in consultation with the Cabinet Member for Housing, to approve individual ‘leaseholder assistance’ offer arrangements to resident leaseholders meeting the hardship and/or vulnerability criteria and require additional support, to enable the vacant possession of the LPS property.

5.6 The existing budget agreed at July 2025 Cabinet provides the budget for the leaseholder buyback proposal, however the additional ‘leaseholder assistance’ budget of £0.1m is sought to facilitate an alternative arrangement as an exceptional requirement due to leaseholder financial hardship and/or vulnerability. The resident leaseholder would need to have an independent financial assessment that would confirm their financial hardship as part of the ‘leaseholder assistance’ requirement.

6. Tenants and Seeking Possession Arrangements

6.1 The creation of new secure tenancies prior to completion of the redevelopment in any of the LPS blocks, St James’s House, Nettleton Court, Dudeney Lodge, Falcon Court, Heron Court, Kestrel Court, Kingfisher Court, and Swallow Court, is not authorised, nor at any property within the redevelopment development areas, included extended development areas.

6.2 When a void property is let as Temporary Accommodation (TA), the occupant will not acquire any of the rights set out in the Re-housing Policy – Regeneration Schemes or the Local Lettings Plan for Large Panel System (LPS) Blocks that have been approved for secure council tenants. This is made clear to the household when they move into the property.

6.3 The LPS properties, or any other property in the redevelopment area or extended redevelopment area, used as temporary accommodation should

be kept under review. At an agreed point TA lets will be stopped and the re-housing of TA residents in the blocks should commence, including taking the decisions to serve the Notices to Quit (NTQ) or proceed with any other necessary route to seek vacant possession of the property. It is sought to delegate authority to the Corporate Director Homes and Adult Social Care to authorise to proceed with the required processes.

6.4 Secure council tenants may need to be vacated from the LPS blocks ahead of redevelopment should the Building Safety Regulator require to council to do so. As such, Cabinet is asked to agree to delegate authority to the Corporate Director for Homes & Adult Social Care to determine when to serve the Notice of Seeking Possession (NOSP) or other legal remedies to secure their removal, of the secure council tenants or TA tenants as necessary.

6.5 Cabinet are asked to note that to be eligible for a statutory homeloss payment, the secure council tenant would need to have been a secure council tenant and lived at the property as their principal home prior for at least 12 months prior to the date at which they were displaced. Cabinet is asked for delegated authority to the Corporate Director Homes and Adult Social Care to update the Local Lettings Plan for Large Panel System (LPS) blocks and the Rehousing Policy – Regeneration Schemes where required.

7. Land assembly – Nettleton Court & Dudeney Lodge, Hollingdean site

7.1 At the Nettleton Court and Dudeney Lodge Hollingdean site, there is an opportunity for wider land assembly beyond the LPS blocks and extending the redevelopment area to provide additional housing. A voluntary freehold property purchase and additional council owned land and property has been identified and more details are contained within the Part 2 report. The freehold property purchase would be based upon the existing resident leaseholder offer for LPS resident leaseholders. Cabinet is asked to delegate authority to the Corporate Director Homes and Adult Social Care in consultation with the Cabinet Member for Housing to consider land assembly requirements and approve the acquisition of property where required in accordance with the Part 1 and Part 2 reports.

7.2 Completion of the acquisition and appropriation of the land within the proposed extended redevelopment area, together with the steps outlined above, is projected to increase the number of homes and will give rise to the potential of a phased approach to redevelopment. It is likely to improve the cohesion of design of the masterplan area and improve viability.

7.3 Further redevelopment opportunities and land assembly for the Hollingdean site has been considered. Following a consultation under Section 105 of the Housing Act 1985, it is proposed to extend the redevelopment area to enable adjacent Ditchling Road properties in the council's ownership to be included. As such, secure council tenants included in the extended redevelopment area are proposed to be given the rights as set out in the Rehousing Policy – Regeneration Schemes and the local Lettings Plan for Large Panel System (LPS) Blocks to align with those in Nettleton Court and Dudeney Lodge and approve the budget for the land assembly.

7.4 Cabinet is asked to approve the service of an Initial Demolition Notice on the secure tenant of a home in the extended redevelopment area, pursuant to paragraph 4(2) of Schedule 5A of the Housing Act 1985 (as amended) and agrees to delegate authority to the Corporate Director for Homes and Adult Social Care to determine the timing and service of the Initial Demolition Notice.

8. Redevelopment Proposals

8.1 Cabinet is asked to agree to delegate authority to the Corporate Director for Homes and Adult Social Care to carry out and then consider Section 105 of Housing Act 1985 consultation for the land surrounding the LPS blocks to be included in the extended LPS development proposal areas for purposes of site set up/demolition/construction welfare areas for all sites where required to enable the delivery of the redevelopment proposals. Consideration of the inclusion in the redevelopment proposal area to enable masterplan improvements including landscaping and opportunities for phased redevelopment and on-site Biodiversity Net Gain opportunities is sought to be delegated to the Corporate Director of Homes and Adult Social Care.

9. Chapel Street Public Car Park

9.1 The public pay-and-display car park beneath St James's House has been closed since 14 July 2024 to meet the requirements of the Building Safety Regulator and East Sussex Fire and Rescue due to its location beneath an LPS block. A delegated decision was made in December 2025 that designs for development of the site would proceed without a replacement public car park.

9.2 Permanent closure of the public pay-and-display car park is now proposed. This does not affect the St. James' Court resident car parking. The public car park closure will enable the council to reduce expenditure on car park equipment maintenance expenses and business rates. Not replacing the car park will avoid High Rise Building (HRB) risk, additional costs and technical challenges that would impact the redevelopment financial viability and delivery. Early Planning advice supports this position, but any development design proposals will be subject to consultation and technical assessments.

9.3 Permanent closure is subject to the outcome of a Traffic Regulation Order and the final decision will be made in accordance with that process and the Council's scheme of delegations.

10. Independent Tenant and Leaseholder Advisor

10.1 An Independent Leaseholder and Tenant Adviser (ITLA) is being co-procured by the council with Resident Advisory Group resident members, who have received training, to provide advice and support to the building occupants.

10.2 It is best practice in regeneration programmes to provide ITL provision to provide independent support and advice to residents, and it is a mitigating factor for the vacant possession risk. A budget is sought for this provision. As the council are running a competitive procurement process, details of the budget are contained in the Part 2 report.

11. Staff Resources

11.1 The budget approved at Cabinet on 17 July 2025 approved a dedicated LPS Estate Renewal team until 2029/30, however to achieve the progress needed to ensure the timelines required for the Initial Demolition Notice additional dedicated staff are required.

11.2 Cabinet is asked to note the challenging external industry conditions and as such to manage risk to the programme delivery and avoid slippage to the programme and additional associated costs, is asked to approve an additional budget of £250k to support dedicated LPS masterplan staff resourcing and reduce vacant possession risk, drive programme delivery to reduce development costs and support residents through rehousing and the masterplanning work. Costs will be capitalised to the schemes and included in the financial appraisal as Administration & Development costs.

11.3 It should be noted that a further staff and consultant budget will be sought for the delivery stages of the masterplans in a future Cabinet paper.

12. Financial Viability

12.1 Several factors impact the financial viability of delivery of the redevelopment of the LPS sites, including increasing build costs and inflation, statutory and regulatory and planning costs, low social rent values are some challenges impacting redevelopment. The three sites will not achieve break-even for the HRA. Therefore, delivery models need to be considered to enable masterplan delivery and an optimised approach to the redevelopment designs as outlined in 3.7 of this report.

12.2 Work to assess viability and delivery routes is ongoing and further information will be provided in a report to Cabinet in 2027.

13. Analysis and consideration of alternative options

13.1 Not approving the recommendations would avoid immediate additional commitments but would increase uncertainty for residents and leaseholders, constrain the masterplan development proposals and programme resource, while increasing vacant possession, delay, and viability risks. Approving these recommendations will help enable a more viable deconstruction and construction programme and is likely to enable more homes to be delivered across the programme.

13.2 Deferring decisions to a future report, anticipated in 2027 would allow more issues to be considered together but would cause delays that would be to the detriment of the residents of the building by increasing uncertainty and prolonging the programme, and impact financial viability.

14. Community engagement and consultation

14.1 Resident engagement was enhanced in the lead in to service of the IDNs and has included community days, newsletters, one-to-one visits and drop-in sessions. The dedicated LPS engagement team have contacted all secure council tenants not yet signed up to Homemove to identify what additional support they may require and are working alongside the LPS Rehousing Officers to provide the information those tenants require.

14.2 Following the listening exercise carried out with the communities by the Director of Estate Renewal, the Resident Advisory Group now has two sub-groups – Resident Communication Champions who review communications to the community before they are sent out to ensure understandable and seek suggestions, and Resident Procurement Champions who have been trained to be involved in co-procurement with the council, including Independent Tenant and Leaseholder Advisors. Resident Design Champions are being capacity built to engage in the production of Resident Design Charters to support the design team procurement.

14.3 A dedicated newsletter explaining the council's decision to redevelop the three sites, and the issuing of the Initial Demolition Notice, with a guarantee that we will consult with them on design proposals has been sent to all residential and non-residential premises within a 300m radius of each site.

14.4 Prior to the IDN's being served, a briefing was offered to all Ward Councillors and one briefing was held. The newsletters and a copy of the IDN and associated documents were provided to all Ward Councillors and MPs in advance of the notices being served.

15. Financial implications

15.1 Cabinet is requested to approve an additional HRA capital budget of £1.460m to support programme delivery, including land assembly, resident rehousing and support arrangements, programme resourcing and associated legal and development costs. Detailed financial implications are set out in the accompanying Part 2 report.

15.2 The proposed expenditure is currently considered affordable within the HRA Business Plan. The additional budget will support programme delivery and resourcing requirements at this stage; however, financial viability assessments and delivery options remain under development and will be reported to a future Cabinet meeting as the programme progresses. The programme includes additional staffing resources and employees engaged over an extended period may become entitled to employment rights comparable to permanent employees, which could give rise to future financial commitments should the resource requirements of the programme change.

15.3 The permanent closure of the Chapel Street car park has already been reflected within existing financial planning assumptions and does not give

rise to any new material financial implications arising from the recommendations within this report.

15.4 Expenditure will be monitored through the Council's monthly Targeted Budget Management (TBM) process, with any variances reported through routine financial monitoring arrangements. The programme is expected to continue over a number of years and any additional funding or resource requirements beyond existing approved budgets will be subject to separate approval and reported through future Cabinet reports, as required.

Name of finance officer consulted: Ferrise Hall Date consulted 15th October 2026

16. Legal implications

16.1 The approvals sought by the recommendations in this report for the three areas in the LPS programme are primarily focused on progressing resident rehousing, reducing risks regarding seeking vacant possession, undertaking land assembly, and related programme activity, the legal powers for which have been outlined in previous reports on the LPS projects and continue to be applicable for any extended redevelopment areas proposed.

16.2 Seeking vacant possession of properties prior to demolition is a critical part of the programme plans and the details relating to all forms of tenure are set out in preceding sections of this report above. The Council's ability to obtain vacant possession in relation to the various tenures in the redevelopment areas are subject to a number of legal requirements and processes. Each tenure will come with its own requirements and should not be considered to be an automatic proposition. Note should also be taken that legal processes to acquire possession can be lengthy and so ample time in the programme plans for each project should be given in advance of the need for vacant possession to allow for these processes (which should be used as a last resort).

16.3 Consideration may need to be given to the future use of Compulsory Purchase Order (CPO) powers to enable land assembly. There are numerous risks involved with the making of a CPO. These include costs, delivery and project time. A route to minimising such risks involves a robust business case for the redevelopment, project plan and acquisition by agreement in the first instance. These risks should be assessed and minimised prior to making any CPO. These are powers of last resort and would be the subject of further reports to Cabinet.

16.4 All steps taken must be in accordance with the Public Sector Equality Duty and taking into account protected characteristics.

Name of lawyer consulted: Siobhan Fry and Simon Court 16 October 2026

17. Risk implications

17.1 A programme risk register and project risk registers are actively monitored to consider mitigations to key risks.

Key Risk	Mitigation
Failure to secure land interests	Negotiation and decision at early design stage to confirm development area
Delay to vacant possession	Additional staff resource and budget is sought in this report to support rehousing, land assembly, negotiations, and resident leaseholder bespoke 'leaseholder assistance' offer and Home Ownership pilot.
Financial viability	Additional staff resource to avoid programme delays to rehousing and interest costs. An optimised approach to design development. Closure of the public Chapel Street car park will avoid business rates costs and maintenance costs.
Limited move-on accommodation	Council buyback programme and development of more council social rented homes
Loss of resident confidence and support	Additional staff resource to avoid programme delays, budget as sought in this report for Independent Tenant and Leaseholder Advisor

18. Equalities implications

18.1 The programme affects a diverse resident population. There are live Equality Impact Assessments (EIA), and these have been updated for this report and are regularly reviewed as part of the programme governance.

18.2 An EIA specifically covering the service of the Initial Demolition Notices has been completed (Appendix 1).

18.3 The EIA for Nettleton Court & Dudeny Lodge, Hollingdean site has been updated to include additional properties (Appendix 2) and notes a minor impact.

18.3 These assessments have and continue to inform delivery of key programme information and communication and adhere to the requirements set out in the 19th March 2026 report section 12.

19. Sustainability implications

19.1 The masterplans provide an opportunity to replace ageing housing with more energy-efficient homes and to integrate biodiversity net gain, climate

resilience, sustainable transport, open space and improved neighbourhood connectivity, by taking a place-based approach.

20. Health and Wellbeing Implications

20.1 The dedicated LPS Community Engagement Officers, LPS Re-Housing Officers and the Independent Tenant and Leaseholder Advisor will support residents and signpost to specialist services where appropriate. TDC have been appointed to provide health and wellbeing support services to residents living in the LPS blocks in 2026-2027.

20.2 Improved housing quality, accessibility and energy performance will benefit health and wellbeing. Rehousing and construction may also cause disruption and stress to the residents of the blocks and the local community respectively. Resident support, accessible communication and individual needs assessments have been carried out with residents of the buildings to mitigate the impact on them.

Other Implications

21. Procurement implications

21.1 Procurement of the consultant and design team, and the ITLA will comply with the Council's procurement requirements, Procurement Act 2023 and Procurement Regulations 2024 and consider sustainable procurement and social value, including employment, skills, apprenticeships, local supply chains and community benefit.

22. Crime & disorder implications

22.1 Future design will apply appropriate security and designing-out-crime principles. Management during decant, demolition and construction will address risks associated with vacant or partially vacant buildings, site security, and anti-social behaviour risks.

23. Conclusion

23.1 The recommendations provide the enabling decisions and resources needed to progress the next phase of the LPS redevelopment programme while retaining clear gateways for detailed financial, legal, consultation and delivery-route decisions. Cabinet is therefore recommended to approve the recommendations at Section 2.

Supporting Documentation

Appendices

1. Masterplan Areas EIA – IDN service
2. Nettleton & Dudeney LPS EIA Oct 26

Background documents

Previous Cabinet Reports	
Cabinet 20 March 2025	Large Panel System Blocks Programme Update https://democracy.brighton-hove.gov.uk/ieListDocuments.aspx?CId=1110&MId=11616&Ver=4
Cabinet 17 July 2025	Large Panel System Blocks – Options Appraisal and Recommendations https://democracy.brighton-hove.gov.uk/ieListDocuments.aspx?CId=1110&MId=11939&Ver=4
Cabinet 19 March 2026	Large Panel Systems Building and Estates Renewal – Section 105, Rehousing Policy and Leaseholder Offer Consultation Programme https://democracy.brighton-hove.gov.uk/ieListDocuments.aspx?CId=1110&MId=11946&Ver=4

Equality Impact Assessment (EIA) Form – Initial Demolition Notices

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:	EIA on the impact of the service of Initial Demolition Notices (IDN), in accordance with Schedule 5A of the Housing Act 1985, in respect of St James's House, (Kemptown), Nettleton Court & Dudeney Lodge (Hollingdean), and Heron, Kestrel, Swallow, Falcon and Kingfisher Courts (collectively the Whitehawk 'Bird Blocks')
Directorate:	Homes & Adult Social Care
Service:	Estate Renewal
Team:	LPS
Is this a new or existing activity?	New
Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)	• HASC-Mar-26-EIA on s105 LLP Rehousing Policy (Housing Register) consultation.docx • Housing-03-Jun-25-EIA-Whitehawk-LPS.docx • Nettleton and Dudeney LPS EIA May 25.docx • St James LPS EIA May 25.docx

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

Responsible Lead Officer:	Paul Dalton, Regeneration Programme Manager
Accountable Manager:	Chantelle Barker, Director of Estate Renewal
Additional stakeholders collaborating or contributing to this assessment:	Marcus Clack, Estate Regeneration Project Manager Martyn Holmes, Estate Regeneration Project Manager Hemangi Sharma, LPS Community Engagement Manager

3. About the activity

Briefly describe the purpose of the activity being assessed:

On 19th March 2026, Cabinet considered the report on Large Panel System (LPS) Building and Estates Renewal, including the outcomes of consultation, structural assessments and recommended next steps for the future of the eight LPS blocks. Cabinet resolved to approve a suite of measures to support residents and leaseholders and to enable the long-term regeneration of the sites.

As part of that decision, Cabinet delegated authority to the Corporate Director of Homes & Adult Social Care to determine the timing and service of Initial Demolition Notices for secure tenants of each of the eight Large Panel System (LPS) buildings, alongside associated powers relating to rehousing arrangements, leaseholder engagement, and support and compensation offers.

Initial Demolition Notices are served on secure tenants in accordance with the Housing Act 1985. While the notices are issued to secure tenants, this step affects all occupants of the buildings, including

household members, leaseholders, leaseholder's private tenants, and temporary accommodation occupants, as well as the neighbouring community and stakeholders.

The serving of Initial Demolition Notices does not require residents to leave their homes, nor does it authorise demolition works to commence. Rather, it is a statutory step which supports long-term regeneration planning and provides time for the development of future proposals, resident engagement, rehousing arrangements and necessary approvals.

The notices formally communicate the Council's intention to demolish the buildings in the future and once served, suspend tenant's statutory Right to Buy while the notice remains in force. This supports the regeneration objectives for the sites and provides greater certainty regarding future planning. The suspension of Right to Buy also enables the Council to introduce the proposed Home Ownership Pact, a pilot scheme designed to support eligible secure tenants who wish to pursue home ownership through alternative routes.

It is therefore proposed that Initial Demolition Notices are served across all three estates concurrently. This would implement the authority granted by Cabinet and provide a clear, transparent and consistent framework for progressing the Estate Regeneration Programme in a planned and coordinated manner.

While the serving of Initial Demolition Notices represents a significant milestone within the regeneration programme, it does not itself create an immediate requirement for residents to move from their homes, nor does it approve demolition or redevelopment proposals.

Any future decision to proceed with demolition would be subject to separate statutory processes, decision-making approvals and consultation requirements, including the issuing of a Final Demolition Notice. These processes will provide further opportunities for residents, leaseholders and other stakeholders to engage and provide feedback before any demolition activity could take place.

No decision is being taken at this stage regarding the detailed redevelopment proposals for individual sites.

What are the desired outcomes of the activity?

The desired outcome is to implement the decision taken by Cabinet and establish the statutory framework necessary to support the long-term regeneration of the eight LPS buildings.

Service of the Initial Demolition Notices will provide legal and procedural certainty regarding the future of the buildings, enabling the regeneration programme to progress in a planned, transparent and legally compliant manner.

The activity seeks to:

- Implement the authority delegated by Cabinet.
- Establish the statutory framework required to support future regeneration activity.
- Provide clarity and transparency regarding the Council's intentions for the buildings.
- Support the ongoing planning of rehousing, resident support and leaseholder engagement arrangements.
- Enable continued engagement with residents, leaseholders, neighbouring communities and other stakeholders regarding future redevelopment proposals.
- Protect the Council's ability to deliver future regeneration objectives approved by Cabinet.
- Ensure statutory requirements are met while maintaining support for affected residents.

While the notices formally communicate the Council's intention to demolish the buildings in the future, they do not require residents to leave their homes, do not approve demolition works, and do not establish detailed redevelopment proposals. The activity is intended to provide sufficient time for future planning, engagement and support arrangements to be developed and implemented.

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

The residents of the eight LPS buildings are the groups most directly affected by the serving of Initial Demolition Notices. This includes:

- Secure council tenants.
- Leaseholders and shared owners.
- Household members, including children and young people.
- Older people.
- Disabled residents.
- Residents with physical or mental health conditions.
- Residents with caring responsibilities.
- Residents requiring information in alternative formats or languages.
- Residents experiencing financial hardship or other forms of vulnerability.

Residents living near the affected buildings are also likely to be impacted indirectly. While no redevelopment proposals have been finalised, neighbours may experience uncertainty regarding the future of their local area and may have concerns about future development, changes to local services, parking, open space, or construction activity. Wider community engagement beyond the residents of the block's forms part of the communication plan.

Community organisations, local businesses and support services operating within the neighbourhoods may also experience indirect impacts and may wish to join local residents in participating in future engagement activities as redevelopment proposals emerge.

Particular consideration should be given to protected characteristic groups who may experience greater impacts from uncertainty, future rehousing requirements or barriers to engagement, including older people, disabled people, people with long-term health conditions, and households with children.

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.

Following the comprehensive Section 105 consultation exercise undertaken in relation to the future of the eight LPS buildings, and the subsequent Cabinet decision in March 2026, a further programme of engagement and communication has been developed to support residents, leaseholders and wider stakeholders ahead of the anticipated serving of Initial Demolition Notices.

The impacts associated with the serving of Initial Demolition Notices have previously been referenced within consultation material and resident communications relating to the wider regeneration programme. Residents have therefore been informed throughout the decision-making process that the serving of such notices could form part of the next steps should the Council determine that demolition and redevelopment represented the preferred long-term option for the buildings.

A targeted programme of engagement has been developed specifically in relation to the proposed service of Initial Demolition Notices. The purpose of this engagement is to ensure that residents, leaseholders and neighbouring communities understand what the notices mean, what the implications are, and equally what they do not mean. Particular emphasis is being placed on explaining that the

notices do not require residents to leave their homes immediately, do not authorise demolition works, and do not represent approval of detailed redevelopment proposals.

Engagement and communication activity includes:

- Distribution of September 2026 monthly speical edition newsletters to all residents within the affected buildings focusing on Initial Demolition Notices. The newsletter contains information explaining the purpose of Initial Demolition Notices, the wider regeneration programme and available sources of support.
- Direct communication with non-resident leaseholders through email and other established communication channels.
- Preparation and distribution of community update leaflets for neighbouring residents and the wider local community, providing information on the current status of the programme and anticipated next steps.
- Updates to the Council's website to ensure residents, leaseholders and other stakeholders have access to current information regarding the regeneration programme and Initial Demolition Notices.
- Training for front-line Housing staff to inform them of the council's messaging in relation to Initial Demolition Notices.
- Update at Area Panels.
- Use of Council social media channels to direct residents and community towards further information and engagement opportunities.

A dedicated Community Day has been arranged for each affected site. These events will provide opportunities for residents to ask questions directly to a wide range of project officers, raise concerns, seek clarification and discuss any issues arising from the news that the council is soon to serve the Initial Demolition Notices.

The cohesion days are scheduled as follows:

- 17 September 2026: St James's House.
- 19 September 2026: Whitehawk "Bird Blocks".
- 23 September 2026: Nettleton Court and Dudeney Lodge.

Each event will run from 1:00pm to 7:00pm to maximise accessibility for residents with differing work patterns, caring responsibilities and other commitments.

The Council will monitor participation levels and feedback received through these engagement activities. Where barriers to engagement are identified, reasonable adjustments and alternative communication methods will be considered to ensure that residents with protected characteristics, including disabled residents, older people, residents with sensory impairments, residents whose first language is not English and residents with limited digital access, are able to access information and participate meaningfully in the process.

Feedback received through previous consultation exercises has highlighted the importance of clear communication, early information sharing, transparency regarding timescales and decision-making, and the provision of ongoing support for affected residents. These themes have informed the approach being taken to engagement around the serving of Initial Demolition Notices and the mitigation measures identified within this Equality Impact Assessment.

The September 2026 newsletter and the IDN will be translated where a need has been identified.

5. Current data and impact monitoring

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

(State Yes, No, Not Applicable as appropriate)

Age	Yes
Disability and inclusive adjustments, coverage under equality act and not	Yes
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	Yes
Religion, Belief, Spirituality, Faith, or Atheism	Yes
Gender Identity and Sex (including non-binary and Intersex people)	Yes (limited)
Gender Reassignment	No
Sexual Orientation	Yes (limited)
Marriage and Civil Partnership	No
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	No
Armed Forces Personnel, their families, and Veterans	Yes (limited)
Expatriates, Migrants, Asylum Seekers, and Refugees	No
Carers	No
Looked after children, Care Leavers, Care and fostering experienced people	Yes (limited)
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	No
Socio-economic Disadvantage	Yes
Homelessness and associated risk and vulnerability	Yes
Human Rights	Yes
Children with SEN	Yes
People with Carelink support	Yes
People experiencing homelessness	Yes
People on a low income and people living in the most deprived areas	Yes
People who have experienced female genital mutilation (FGM)	No
People who have experienced human trafficking or modern slavery	No
People with experience of or living with addiction and/ or a substance use disorder (SUD)	Yes (limited)

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?

Where specific data is not currently available for the groups identified as "No", impact will be monitored through ongoing resident engagement, consultation activities, feedback mechanisms, equality monitoring data where appropriate, and collaboration with relevant support services and community organisations. This will help identify any emerging disproportionate impacts and inform future assessments and mitigation measures.

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

We have set up regular meetings of Resident Advisory Groups, which is an informal group of residents who have questions about the programme. As part of the group, we invite service managers to attend to review residents’ questions. We have Resident Communications Representatives who review communications to ensure the newsletters and letters are easy to understand. We have set up a single point of contact for residents who will capture queries from residents as the programme progresses and help them resolve issues affecting them individually. We report to Cabinet and the Cabinet Member for Housing, Area Panel meetings, with data on progress. There is a monthly LPS Strategic meeting plus operational Project Group Meetings. The information and feedback from these meetings and stakeholders will be continually assessed and outcomes adjusted to suit the information received. The Community Engagement Team will follow up with residents following the issuing of the IDN through personal visits. Weekly drop-ins will continue for each site. Residents and the wider community will be given an email address for any enquiries. The team will continue to provide updates to all building occupants at least monthly through the Newsletter.

6. Impacts

Advisory Note:

- **Impact:**
  - Assessing disproportionate impact means understanding potential negative impact (that may cause direct or indirect discrimination), and then assessing the relevance (that is: the potential effect of your activity on people with protected characteristics) and proportionality (that is: how strong the effect is).

    - These impacts should be identified in the EIA and then re-visited regularly as you review the EIA every 12 to 18 months as applicable to the duration of your activity.
- **SMART Actions mean**: Actions that are (SMART = Specific, Measurable, Achievable, Realistic, T = Time-bound)
- **Cumulative Assessment:** If there is impact on all groups equally, complete **only** the cumulative assessment section.
- **Data analysis and Insights:**
    - In each protected characteristic or group, in answer to the question 'If "YES", what are the positive and negative disproportionate impacts?', describe what you have learnt from your data analysis about disproportionate impacts, stating relevant insights and data sources.
    - Find and use contextual and wide ranges of data analysis (including community feedback) to describe what the disproportionate positive and negative impacts are on different, and intersecting populations impacted by your activity, especially considering for Health inequalities, review guidance and inter-related impacts, and the impact of various identities.
    - For example: If you are doing road works or closures in a particular street or ward – look at a variety of data and do so from various protected characteristic lenses. Understand and analyse what that means for your project and its impact on different types of people, residents, family types and so on. State your understanding of impact in both effect of impact and strength of that effect on those impacted.
- **Data Sources:**
    - **Consider a wide range (including but not limited to):**
        - Population and population groups
            - Census 2021 population groups Infogram: Brighton & Hove by Brighton and Hove City Council
        - Census and local intelligence data
        - Service specific data
        - Community consultations
        - Insights from customer feedback including complaints and survey results
        - Lived experiences and qualitative data
        - Joint Strategic Needs Assessment (JSNA) data
        - Health Inequalities data
        - Good practice research
        - National data and reports relevant to the service
        - Workforce, leaver, and recruitment data, surveys, insights
        - Feedback from internal 'staff as residents' consultations
        - Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
        - Insights, gaps, and data analyses on 'who' the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.
- Learn more about the Equality Act 2010 and about our Public Sector Equality Duty.

6.1 Age

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

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

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

Data drawn from the ONS 2024 Mid-Year Population Estimates indicates that Brighton & Hove has a resident population of approximately 283,870 people, including:

- 40,350 children aged 0 to 15 years (14%)
- 203,000 working-age adults aged 16 to 66 years (72%)
- 40,520 people aged over 66 years (14%)

When compared to citywide demographics, council housing residents living within the eight LPS blocks have an older age profile.

Housing management data indicates that residents of St James's House include comparatively higher proportions of people aged 40 to 59 (34%) and 60 and over (26%), with a lower proportion of people aged 18 to 39. The proportion of occupants aged under 18 is broadly comparable with council housing and citywide averages.

Occupants of Nettleton Court and Dudeney Lodge have a significantly older age profile, with approximately 50% of occupants aged 65 or over, including around 7% aged over 80. There are no occupants aged under 18 recorded within these buildings.

Occupants of the Whitehawk LPS buildings have comparatively higher proportions of residents aged under 18 and residents aged 60 and over than other age groups.

There is also a clear relationship between age and mobility needs across the affected buildings. Housing data demonstrates that mobility requirements increase significantly amongst older residents. In the affected LPS blocks:

- 56% of St James's House tenants with identified mobility needs are aged 60 or over.
- 74% of Whitehawk LPS tenants with identified mobility needs are aged 60 or over.
- 82% of Nettleton Court and Dudeney Lodge tenants with identified mobility needs are aged 60 or over.

The serving of Initial Demolition Notices may have a disproportionate impact on older residents. While the notices do not require residents to leave their homes and do not authorise demolition works, they formally communicate the Council's intention to demolish the buildings in the future. This may create greater uncertainty and anxiety amongst some older residents, particularly those with long-standing connections to their homes, neighbourhoods and support networks.

Older residents may require additional support to understand the purpose and implications of the notices and may have concerns regarding the future of their housing circumstances. Residents over 80 years of age and residents with mobility limitations may be particularly affected by uncertainty associated with long-term regeneration proposals.

Children and young people may also be indirectly affected. Although no immediate rehousing is required as a result of the notices, households with children may have concerns regarding future housing arrangements, schooling continuity and maintaining local support networks.

Working-age residents may similarly experience concerns regarding future housing arrangements and any long-term implications for employment, caring responsibilities and travel patterns.

Mitigating Actions

The Council has established a comprehensive resident engagement and support programme to help minimise these impacts.

SMART Action: Each secure tenant household has a dedicated Single Point of Contact (SPOC) who will provide tailored advice and support throughout the regeneration programme. This includes:

- Providing information and clarification regarding the regeneration programme and future processes.
- Assisting residents to understand their housing options and rights.
- Providing referrals to support services where additional needs are identified.
- Arranging interpreters and accessible communications where required.
- Supporting residents with mobility, health and accessibility needs.
- Liaising with existing support agencies and professionals where appropriate.
- Providing practical assistance with any future rehousing process should this become necessary.

Additional mitigation measures include:

- Multi-format communication including face-to-face engagement, letters, newsletters, email communications and website updates.
- Home visits where required for residents unable to attend engagement events.
- Interpreter and translation support where required.
- Appointment-based engagement opportunities for residents with anxiety, mental health needs or complex support requirements.
- Flexible engagement opportunities across different times, locations and communication channels.
- Dedicated resident engagement events focused on explaining the purpose and implications of Initial Demolition Notices.

These measures are designed to ensure that residents of all ages can access information, understand the implications of the notices and engage meaningfully with the regeneration programme.

There is also a planned tour of Senior's Housing schemes in the city for interested tenants, with interested residents providing their names to the Community Engagement Team in September.

6.2 Disability:

Does your analysis indicate a disproportionate impact relating to Disability, considering our anticipatory duty?	YES

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

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

ONS Census 2021 data indicates that approximately 19% of Brighton & Hove residents are disabled under the Equality Act 2010 definition.

Housing Management System data suggests that the proportion of residents within the affected LPS buildings with support needs that would meet the definition of disability under the Equality Act 2010 is significantly higher than both the citywide population and the wider council housing population.

Disabled under Equality Act definition	Whitehawk LPS	Nettleton & Dudeney	St James's House	All Council Housing	B&H Census 2021
Yes	30%	58%	29%	22%	19%
No or not recorded	70%	42%	71%	78%	81%

In particular, Nettleton Court and Dudeney Lodge contain a substantially higher proportion of residents with identified disabilities and support needs than the city average.

Further evidence from Health Counts 2024 suggests that the proportion of disabled adults within Brighton & Hove may be higher than that identified through the Census, with 37% of adults reporting that their day-to-day activities are limited by a long-term physical or mental health condition or illness.

The serving of Initial Demolition Notices may therefore have a disproportionate impact on disabled residents because disabled people are significantly overrepresented within the affected buildings.

While the notices do not require residents to leave their homes, do not authorise demolition works, and do not trigger immediate rehousing activity, they formally communicate the Council's intention to demolish the buildings in the future. This may create uncertainty, anxiety and concern for some disabled residents, particularly those who rely on established support networks, local healthcare provision, formal care arrangements, adaptations within their homes, or familiar environments that support independent living.

Data held by the Council indicates that approximately 43% of occupants across the affected buildings are identified as having potential additional support needs. These include:

- Physical disabilities.
- Sensory impairments.
- Mental health conditions.
- Learning disabilities and learning difficulties.
- Neurodivergent conditions.
- Speech and communication needs.
- Children with Special Educational Needs (SEN).
- Long-term health conditions.

Residents with sensory impairments, learning disabilities, cognitive impairments or limited literacy may experience greater difficulty understanding the legal purpose and implications of Initial Demolition Notices. There is therefore a risk that some residents may misunderstand the notices as indicating an immediate requirement to move or an immediate risk associated with the buildings.

Residents with mental health conditions may experience increased anxiety or distress arising from uncertainty regarding their future housing circumstances, even where no immediate action is required.

The Council also recognises that disability may intersect with other protected characteristics and vulnerabilities, including age, caring responsibilities, deprivation, ethnicity and language barriers, potentially increasing the impact experienced by some individuals.

The serving of Initial Demolition Notices provides residents with formal and transparent information regarding the Council's intentions for the buildings and establishes a clear framework for future planning.

The regeneration programme includes significant support arrangements designed to identify and respond to individual needs at an early stage. This enables the Council to better understand residents' circumstances and plan future housing and support provision accordingly.

The Council has adopted an anticipatory approach to accessibility and support for disabled residents.

SMART Action: Every secure tenant household has been allocated a dedicated Single Point of Contact (SPOC) who will provide ongoing support throughout the regeneration programme and act as a consistent point of contact for questions, concerns and support needs.

The SPOC model enables:

- Early identification of disability-related needs and reasonable adjustments.
- Individual discussions regarding concerns arising from the notices.
- Liaison with family members, carers and support agencies where appropriate.
- Support in accessing wider council and partner services.
- Tailored communication based on individual circumstances.

Additional mitigation measures include:

- Multi-format communication including letters, newsletters, email, telephone and face-to-face engagement.
- Home visits for residents who are unable to attend engagement events.
- Large print, Easy Read, Braille, translation and interpretation services where required.
- Flexible engagement opportunities across different times and locations.
- One-to-one engagement sessions for residents with complex needs or heightened anxiety.
- Dedicated resident engagement events focused on explaining the purpose and implications of Initial Demolition Notices.
- Ongoing review of reasonable adjustments to ensure disabled residents can access information and participate fully in engagement activity.

Where future rehousing becomes necessary as part of subsequent regeneration decisions, additional support arrangements are already established through the approved rehousing policy, including assistance relating to accessibility requirements, property adaptations, removals support and maintaining access to essential services.

For leaseholders, there is a potential future risk that suitable replacement accommodation meeting specific accessibility needs may be more difficult to secure. To mitigate this, the Council's compensation and support arrangements include provision for the reasonable costs of reinstating essential adaptations where appropriate.

A disproportionate impact on disabled residents is identified because disabled people are significantly overrepresented within the affected buildings. The principal impact associated with the serving of Initial Demolition Notices relates to communication, understanding, anxiety and uncertainty regarding future housing circumstances rather than any immediate physical change to residents' living arrangements. The extensive communication, engagement and support measures outlined above are intended to minimise these impacts and ensure disabled residents are able to understand, access and engage with the process on an equitable basis.

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

The Council will provide information through a range of accessible formats and communication channels, including face-to-face engagement, telephone, email, letters and home visits where required. Reasonable adjustments will be made on an individual basis and may include large print, Easy Read, translation and interpretation services, BSL support, and engagement tailored to residents with sensory impairments, learning disabilities, neurodivergence, mental health conditions or other non-visible disabilities. Each secure tenant household has a dedicated Single Point of Contact (SPOC) who can identify support needs, coordinate adjustments and ensure residents can access information and engage meaningfully with the process.

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

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

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

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

Housing Management System data indicates that St James's House has a significantly higher proportion of Black and Racially Minoritised occupants (39%) than both the wider council housing population (20%) and the citywide population recorded in the 2021 Census (26%). Whitehawk LPS blocks and Nettleton Court/Dudeney Lodge have proportions broadly comparable to the wider council housing population at around 20%.

The data also indicates that a number of residents across the affected buildings have a first language other than English, including Arabic, Bengali, Farsi, Italian, Latvian, Mandarin, Polish, Portuguese, Russian, Spanish, Swahili and Thai. This may create barriers to understanding the purpose and implications of Initial Demolition Notices if information is not communicated clearly and accessibly.

The serving of Initial Demolition Notices may therefore have a disproportionate impact on some Black and Racially Minoritised residents and residents for whom English is not their first language. There is a risk that residents may be less able to access information, misunderstand the legal purpose of the notices, or face barriers to participation in engagement activities without appropriate support.

The Council recognises that residents from ethnically diverse backgrounds may have differing experiences of public services, housing systems and statutory processes. Clear, transparent and culturally sensitive communication will therefore be important to ensure residents understand that the notices do not require anyone to move from their home immediately and do not authorise demolition works.

To mitigate these potential impacts, information will be provided through multiple communication channels including written correspondence, newsletters, engagement events, home visits and one-to-one discussions. Translation and interpretation services will be available where required and residents will be able to discuss concerns with their dedicated Single Point of Contact (SPOC). Resident engagement events will also provide opportunities to ask questions and seek clarification regarding the notices and the wider regeneration programme.

These measures are intended to ensure residents from all ethnic backgrounds can access information, understand the implications of the notices and participate meaningfully in the process.

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

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

Housing Management System data indicates that residents across the affected LPS buildings represent a diverse range of religious beliefs and faiths, including Christian, Muslim, Buddhist, Hindu and other faith communities, alongside residents who identify as having no religion.

Compared with citywide Census data, the affected buildings generally have a higher proportion of residents identifying as Christian, Muslim and other faith groups, and a lower proportion reporting no religion. St James's House has a particularly higher proportion of Muslim residents (11%) compared with the city average (3%).

The serving of Initial Demolition Notices is not expected to have a direct impact on residents because of their religion, belief or faith. However, there may be an indirect disproportionate impact if communication and engagement activities do not adequately consider religious observance, cultural practices or significant faith dates which could affect residents' ability to engage with the process.

The Council recognises that residents from different faith communities may have specific requirements relating to communication, household arrangements, caring responsibilities or availability to attend engagement events. There may also be cultural sensitivities that require a flexible and respectful approach to engagement.

To mitigate these potential impacts, engagement opportunities will be offered through a range of channels, including newsletters, letters, home visits, one-to-one meetings and resident engagement events. Officers will seek to understand any cultural, religious or faith-related considerations on an individual basis, and residents will be able to discuss any requirements with their dedicated Single Point of Contact (SPOC).

These measures are intended to ensure residents of all religions, beliefs and faith backgrounds, as well as those with no religion, can access information, understand the purpose of the Initial Demolition Notices and engage meaningfully with the process.

6.5 Gender Identity and Sex:

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

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.

Housing Management System data identifies some variation in the gender profile of residents across the affected LPS buildings. Whitehawk LPS blocks have a slightly higher proportion of female occupants (55%), whilst Nettleton Court and Dudeney Lodge have a higher proportion of male occupants (70%). St James's House has a broadly even gender profile.

The Council does not currently hold sufficient evidence to indicate that the serving of Initial Demolition Notices will have a disproportionate impact on residents because of their sex or gender identity.

The notices apply equally to all residents regardless of sex, gender identity, non-binary status or intersex status. They do not require residents to leave their homes, alter tenancy arrangements or authorise demolition works. The Council recognises that some residents may face barriers to engagement arising from caring responsibilities, confidence in engaging with services or other intersecting characteristics. To mitigate this, information and engagement opportunities will be made available through a range of channels and formats, ensuring all residents can access information and advice as required. Equality information will continue to be monitored throughout the regeneration programme and this EIA will be reviewed if any disproportionate impacts emerge.

6.6 Gender Reassignment:

Does your analysis indicate a disproportionate impact relating to Gender Reassignment?	NO

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

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

The Council does not hold sufficient evidence to indicate that the serving of Initial Demolition Notices will have a disproportionate impact on residents undergoing, proposing to undergo, or having undergone gender reassignment. The notices apply equally to all residents regardless of gender reassignment status and do not require residents to leave their homes or alter any existing tenancy arrangements. The Council recognises that the absence of recorded data does not necessarily mean transgender residents are not represented within the affected buildings. Engagement activities and support arrangements will therefore be delivered in an inclusive, respectful and person-centred manner, ensuring all residents can access information and engage meaningfully with the process. Equality monitoring information will continue to be reviewed throughout the regeneration programme and any emerging impacts will be assessed through future reviews of this EIA.

6.7 Sexual Orientation:

Does your analysis indicate a disproportionate impact relating to Sexual Orientation?	Yes (limited)

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

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

Available Housing Management System data indicates that St James's House and Nettleton Court/Dudeney Lodge have higher proportions of residents recorded as Gay or Lesbian than both the wider council housing population and Brighton & Hove residents overall. However, sexual orientation data is not available for all occupants and the Council recognises that under-reporting is common. The absence of recorded data does not indicate there are no LGBTQ+ residents living within the affected buildings. Health Counts 2024 data further highlights that Brighton & Hove has a relatively large LGBTQ+ population compared to many areas nationally. This means it is likely that LGBTQ+ residents are

represented across the affected buildings and should be considered within engagement and support planning.

The serving of Initial Demolition Notices is not expected to have a direct impact based on a person's sexual orientation. However, LGBTQ+ residents may experience disproportionate impacts where previous experiences of discrimination, exclusion or mistrust of services create barriers to engagement or accessing support. Some residents may be less likely to seek assistance or participate in engagement activities without reassurance that services are inclusive and welcoming.

To mitigate these potential impacts, the Council will ensure engagement activities are delivered in an inclusive and respectful manner, with multiple opportunities for residents to ask questions, seek clarification and access support. Residents will be able to discuss individual circumstances with their dedicated Single Point of Contact (SPOC) and access support through a range of communication channels.

The Council recognises the importance of ensuring that all residents, including LGBTQ+ residents, can access information, understand the purpose and implications of Initial Demolition Notices and engage meaningfully with the regeneration programme. Equality monitoring data will continue to be reviewed where appropriate to help inform future engagement activity and support arrangements.

Conclusion: While no direct impact arising from sexual orientation has been identified, a potential disproportionate impact exists due to the higher representation of LGBTQ+ residents within some of the affected buildings and the importance of ensuring engagement and support arrangements are inclusive and accessible to all residents.

6.8 Marriage and Civil Partnership:

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

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

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

Health Counts 2024 data indicates that Brighton & Hove residents have a diverse range of marital and partnership statuses, including people who are married, in civil partnerships, divorced, separated, widowed, or have never married.

The Council holds limited data regarding marriage and civil partnership status for residents living within the affected LPS buildings. As a result, there is insufficient evidence to identify a disproportionate impact arising from the serving of Initial Demolition Notices based on this protected characteristic.

The serving of Initial Demolition Notices applies equally to all secure council tenants regardless of their marital status or whether they are in a civil partnership. The notices do not require residents to leave their homes, change existing tenancy arrangements, or alter legal rights associated with marriage or civil partnership.

While future rehousing or regeneration proposals may require consideration of household composition, caring arrangements and housing requirements, no disproportionate impact relating specifically to Marriage and Civil Partnership has been identified at this stage.

The Council recognises that the absence of recorded data does not necessarily mean there are no residents with this characteristic, and engagement and support arrangements will remain available equally to all residents and households throughout the regeneration programme.

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

Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)?	NO

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.

Data drawn from ONS population and births data indicates that there are significant numbers of people of childbearing age living across Brighton & Hove, and it is therefore likely that some residents living within the affected LPS buildings may be pregnant, have very young children, be adoptive parents, or have caring responsibilities associated with maternity or paternity.

However, the Council does not routinely collect data on pregnancy, maternity, paternity, adoption, menopause or fertility status, and no disproportionate impact relating to these characteristics has been identified through engagement activity undertaken to date.

The serving of Initial Demolition Notices does not require residents to move from their homes immediately, does not change existing tenancy arrangements, and does not result in any immediate physical changes to residents' living circumstances. As such, no direct disproportionate impact associated with pregnancy, maternity, paternity, adoption, menopause or fertility has been identified.

The Council recognises that some residents within these groups may nevertheless experience concerns regarding future housing circumstances and the long-term implications of the regeneration programme. Information and support will therefore be made available through a range of communication channels, and residents will be able to discuss individual circumstances with their dedicated Single Point of Contact (SPOC).

The Council also recognises that the absence of recorded data does not mean that residents with these characteristics are not present within the affected buildings. Equality impacts will continue to be monitored throughout the regeneration programme, particularly if future decisions relating to rehousing or redevelopment are brought forward.

6.10 Armed Forces Personnel, their families, and Veterans:

Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?	Yes (limited)

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.

Housing Management System data identifies a small number of residents within the affected LPS buildings who are recorded as current or former Armed Forces personnel. However, the Council does not hold sufficient data to determine whether Armed Forces personnel, veterans or their families are disproportionately represented within the affected buildings.

No evidence has been identified through engagement activities, resident feedback or available data to suggest that the serving of Initial Demolition Notices will have a disproportionate impact on residents because of their Armed Forces status.

The serving of Initial Demolition Notices applies equally to all residents regardless of whether they are serving personnel, veterans or family members of the Armed Forces. The notices do not require residents to leave their homes, alter tenancy arrangements or affect access to existing support services.

The Council recognises that some residents may nevertheless identify as veterans or members of Armed Forces families and that the absence of recorded data does not necessarily mean that no impacts exist. Information and support will continue to be made available through a range of communication channels, and any individual needs identified through ongoing engagement will be considered on a case-by-case basis.

The Council will continue to monitor available data and feedback throughout the regeneration programme to ensure any emerging impacts on Armed Forces personnel, veterans or their families are identified and addressed where appropriate.

6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

Does your analysis indicate a disproportionate impact relating to Expatriates, Migrants, Asylum seekers, Refugees, those New to the UK, and UK visa or assigned legal status? (Especially considering for age, ethnicity, language, and various intersections)	No

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.

Home Office data indicates that Brighton & Hove is home to a number of asylum seekers, refugees and people participating in resettlement schemes. However, the Council does not currently hold sufficient data to determine the extent to which these groups are represented within the affected LPS buildings.

Housing Management System data does identify residents within the affected buildings whose first language is not English, including speakers of Arabic, Bengali, Farsi, Italian, Latvian, Mandarin, Polish, Portuguese, Russian, Spanish, Swahili and Thai. This suggests that some residents may face language barriers or may be less familiar with UK housing systems and legal processes.

The serving of Initial Demolition Notices may therefore have a disproportionate impact on some migrants, refugees, people new to the UK and residents for whom English is not their first language. There is a risk that residents may misunderstand the legal purpose of the notices, be uncertain about how they affect their housing circumstances, or experience increased anxiety where statutory housing processes are unfamiliar.

The Council recognises that some residents may also have experienced displacement, trauma or housing insecurity prior to arriving in the UK, which may make communications regarding demolition and regeneration proposals particularly sensitive.

To mitigate these potential impacts, information will be provided through a variety of communication channels, including written correspondence, newsletters, resident engagement events, home visits and one-to-one discussions. Translation and interpretation services will be available where required, and residents will be able to discuss any concerns with their dedicated Single Point of Contact (SPOC).

The Council will continue to monitor available data and feedback received through engagement activity and will seek to identify and address any barriers experienced by residents who are migrants, refugees, asylum seekers, expatriates or otherwise new to the UK. These measures are intended to ensure all residents can access information, understand the implications of the Initial Demolition Notices and engage meaningfully in the process regardless of nationality, language or immigration background.

6.12 Carers:

Does your analysis indicate a disproportionate impact relating to Carers (Especially considering for age, ethnicity, language, and various intersections).	No

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

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

The Council does not currently hold comprehensive data on unpaid carers living within the affected LPS buildings. However, given the high proportion of older residents, disabled residents and residents with support needs across the buildings, it is likely that some occupants undertake caring responsibilities for partners, family members, neighbours or friends.

The serving of Initial Demolition Notices does not require residents to move from their homes and therefore does not create any immediate impact on caring arrangements. However, carers may experience disproportionate impacts arising from uncertainty about future housing circumstances and concerns regarding the continuity of care, support networks and accessibility of local services.

Carers may also face practical barriers to engaging with consultation and engagement activities due to caring responsibilities, limited availability and competing demands on their time. These challenges may be more pronounced where caring responsibilities intersect with disability, older age, language barriers or financial hardship.

To mitigate these potential impacts, the Council is providing a range of engagement opportunities, including resident events, one-to-one discussions, telephone contact, written communications and home visits where required. Flexible engagement arrangements will help ensure carers can access information and participate in the process in a way that accommodates their circumstances.

Each secure tenant household has a dedicated Single Point of Contact (SPOC) who can identify caring responsibilities and ensure any support needs are considered as the regeneration programme progresses. Residents will also be able to discuss any concerns regarding caring arrangements, support networks or accessibility requirements throughout the process.

The Council recognises that not all carers are formally identified and will continue to monitor feedback and information gathered through engagement activity to ensure carers are appropriately supported and able to engage meaningfully with the process.

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 (limited)

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.

Housing Management System data identifies a small number of residents within the affected LPS buildings who are recorded as care leavers. The Council recognises that care-experienced people may

be more likely to experience housing insecurity, reduced support networks and additional vulnerabilities when compared with the wider population.

Whilst the serving of Initial Demolition Notices does not require residents to move from their homes and does not result in any immediate changes to housing arrangements, some care-experienced residents may experience increased anxiety or uncertainty regarding their future housing circumstances and support arrangements.

The Council has ongoing corporate parenting responsibilities and recognises the importance of ensuring that care-experienced people, children in need and any looked after children connected to affected households receive appropriate support throughout the regeneration programme.

Where care-experienced residents, children in need, SEND children or other vulnerable young people are identified, officers will continue to work closely with Families, Children and Wellbeing services and other relevant agencies to ensure individual circumstances are understood and support needs are met.

Each secure tenant household has a dedicated Single Point of Contact (SPOC) who can identify additional support requirements, liaise with social workers and other professionals where appropriate, and ensure residents receive information and support in a way that meets their individual needs.

The Council already has established protocols and support mechanisms for care-experienced people through its wider housing policies and will continue to monitor data and engagement feedback throughout the regeneration programme. The Council recognises that the absence of recorded data does not necessarily mean there are no residents with care experience living within the affected buildings and will seek to identify and address any emerging impacts as the programme progresses.

A potential disproportionate impact has been identified due to the additional vulnerabilities that can be experienced by care-experienced people and the Council's Corporate Parenting responsibilities. Ongoing partnership working and tailored support arrangements are intended to mitigate these impacts.

6.14 Homelessness:

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

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

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

Housing data indicates that a proportion of occupants within the affected LPS buildings are living in temporary accommodation under the Council's statutory homelessness duties. Approximately 12% of occupants within the Whitehawk LPS blocks, 12% within Nettleton Court and Dudeney Lodge, and 15% within St James's House are in temporary accommodation.

The serving of Initial Demolition Notices may have a disproportionate impact on residents who have experienced homelessness or housing instability, as these residents may be more likely to experience anxiety or uncertainty regarding their future housing circumstances. This may be particularly relevant for residents who have previously experienced periods of homelessness, displacement or insecure housing.

Whilst the notices do not require residents to move from their homes and do not result in any immediate change to accommodation arrangements, some residents may have concerns about how the regeneration programme could affect their future housing situation.

The Council has a dedicated housing team in place to support residents occupying temporary accommodation within the affected buildings. Temporary accommodation residents have been included

in engagement and communication activity and will continue to receive information regarding the programme through a range of channels.

Where leaseholders have rented properties to private tenants, efforts have been made to include those households within engagement activity, communications and home visits where possible. Private tenants requiring housing advice or support will be signposted to the Council's Housing Options and Homelessness Service.

Engagement arrangements, including resident events, written communications, home visits and one-to-one discussions, are intended to ensure that residents experiencing homelessness or housing vulnerability are able to access information, understand the purpose of the Initial Demolition Notices and obtain support where required.

The Council will continue to monitor the needs of residents who are homeless, living in temporary accommodation, or otherwise vulnerable to housing insecurity as the regeneration programme progresses.

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.

Some residents may be survivors of domestic abuse, sexual violence or other forms of trauma and may experience greater anxiety or uncertainty as a result of receiving an Initial Demolition Notice. The Council will take a trauma-informed approach to engagement and communication, with support tailored to individual circumstances. Where vulnerabilities are identified, residents will be supported through their dedicated Single Point of Contact (SPOC) and, where appropriate, linked with specialist services including IDVAs and other support agencies. This will help ensure residents can access information, understand the implications of the notices and engage safely with the process.

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.

Housing data indicates that a significant proportion of residents across the affected LPS buildings experience financial hardship, including rent arrears and reliance on Universal Credit. As a result, some residents may be more vulnerable to uncertainty arising from the serving of Initial Demolition Notices and may have concerns regarding the future impact on their housing circumstances.

Residents experiencing socio-economic disadvantage may face additional barriers to accessing information and engaging with the regeneration programme due to financial pressures, caring responsibilities, digital exclusion or other vulnerabilities.

To mitigate these impacts, the Council is providing information through multiple channels, including newsletters, letters, resident engagement events, home visits and one-to-one discussions. Each secure tenant household has a dedicated Single Point of Contact (SPOC) who can provide advice, identify additional support needs and signpost residents to relevant financial, housing and welfare support services where required. The Council will continue to engage with residents throughout the regeneration programme and ensure support arrangements remain accessible to those experiencing financial hardship or other forms of socio-economic disadvantage. A disproportionate impact is identified because residents experiencing financial hardship may be more affected by uncertainty regarding future housing arrangements and may face greater barriers to engagement. Ongoing communication, support and targeted assistance will help mitigate these impacts.

6.17 Human Rights:

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

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

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

The serving of Initial Demolition Notices has the potential to engage Article 8 of the Human Rights Act 1998, which protects the right to respect for private and family life, home and correspondence. Residents may experience anxiety or uncertainty arising from the formal notification of the Council's intention to demolish the buildings in the future. However, the serving of an Initial Demolition Notice does not require residents to leave their homes, does not authorise demolition works, and does not remove existing tenancy rights. Any future decision to demolish the buildings would be subject to further statutory processes, consultation and decision making. To mitigate potential impacts, the Council will continue to provide clear communication, ongoing engagement opportunities and tailored support through dedicated Single Points of Contact (SPOCs). Existing tenants continue to be eligible for support through the approved rehousing arrangements, including the opportunity to return to a new home on the redeveloped site where this forms part of future regeneration proposals. Support and compensation arrangements for leaseholders have also been developed to help minimise adverse impacts. The Council considers that any interference with Article 8 rights is proportionate, justified and balanced against the legitimate aim of ensuring the long-term safety, sustainability and regeneration of the affected buildings and estates.

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 serving of Initial Demolition Notices may have a greater impact on residents who experience multiple forms of disadvantage or who hold multiple protected characteristics. While the notices do not require residents to move from their homes and do not authorise demolition works, some residents may experience heightened anxiety, uncertainty or barriers to understanding and engaging with the process.

Particular consideration has been given to:

- Older disabled residents, particularly those with mobility, sensory, cognitive or mental health needs.
- Residents with disabilities whose first language is not English.
- Black and Racially Minoritised residents who may also experience socio-economic disadvantage, disability, caring responsibilities or digital exclusion.
- Carers who are supporting older people, disabled people or children with additional needs.
- Residents experiencing financial hardship, rent arrears or housing insecurity.
- Residents in temporary accommodation or who have previously experienced homelessness.
- Residents who are digitally excluded, have low literacy levels or require information in alternative formats.
- Survivors of domestic abuse, trauma, exploitation or other vulnerable circumstances.
- Care-experienced residents and those with limited support networks.

Residents with multiple protected characteristics may face compounded barriers when accessing information, understanding statutory processes or engaging in consultation activities. For example, an older disabled resident with limited English proficiency may require additional support to understand the implications of the notices and participate meaningfully in engagement opportunities.

The Council has sought to mitigate these risks through a trauma-informed and person-centred approach. Information is being provided through multiple communication channels, including newsletters, letters, resident events, home visits, telephone contact and one-to-one discussions. Translation services, interpretation, accessible formats and reasonable adjustments will be provided where required.

Each secure tenant household has a dedicated Single Point of Contact (SPOC) who can identify individual needs, coordinate support and ensure barriers to engagement are addressed. The SPOC approach allows support to be tailored to residents' individual circumstances and recognises that impacts are often shaped by a combination of personal, social and economic factors rather than a single characteristic in isolation.

The Council will continue to gather feedback through engagement activities and monitor emerging equalities impacts throughout the regeneration programme. This will help ensure that support arrangements remain proportionate, inclusive and responsive to the needs of residents experiencing multiple and intersecting forms of disadvantage.

The greatest potential impact arising from the serving of Initial Demolition Notices relates to residents experiencing multiple vulnerabilities or protected characteristics, particularly where these affect communication, access to information, confidence in engagement processes or understanding of future housing implications. The programme's communication, engagement and support arrangements are intended to minimise these impacts and ensure all residents can participate on an equitable basis.

7. Action planning

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

Ensure residents understand the purpose and implications of Initial Demolition Notices.

Activities:

- Deliver resident engagement events at all three sites before notices are served.
- Provide information through newsletters, letters, website updates and home visits where necessary.
- Monitor resident enquiries and misconceptions and update communications accordingly.
- Provide translated information where required

Success measure: All affected households receive communications prior to service of notices.

Target date: September 2026.

1. **Ensure residents requiring additional support can access information and engagement opportunities.**

Activities:

- SPOCs to identify residents requiring reasonable adjustments.
- Provide translations, interpretation, Easy Read and alternative formats where required.
- Undertake targeted engagement with vulnerable households.

Success measure: All identified support requests actioned within agreed timescales.

Target date: Ongoing throughout programme.

Which action plans will the identified actions be transferred to?

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

The actions identified through this EIA will be incorporated into the LPS Regeneration Programme Plan, associated resident engagement and communications plans, and monitored through the Directorate EIA Tracker in line with the Council's Fair and Inclusive Action Plan (FIAP) requirements.

The key actions are to:

- Maintain a dedicated Single Point of Contact (SPOC) for each secure tenant household to identify support needs, coordinate reasonable adjustments and provide ongoing support throughout the regeneration programme.
- Undertake targeted engagement with residents who may experience disproportionate impacts, including older people, disabled residents, residents with mental health needs, carers, residents with limited English proficiency, and residents experiencing financial hardship or other vulnerabilities.
- Deliver a clear and accessible communications strategy using multiple formats and channels, including newsletters, letters, email, telephone contact, home visits, website updates, resident engagement events, translation services, interpretation support, Easy Read and large-print formats where required.
- Continue resident engagement activity before and after the serving of Initial Demolition Notices, including dedicated resident events, drop-in sessions and one-to-one discussions to ensure residents understand the purpose and implications of the notices.
- Monitor participation and engagement levels across protected characteristic groups and take action where underrepresentation or barriers to engagement are identified.
- Ensure residents have clear routes to raise concerns, ask questions, make complaints and receive timely responses.
- Continue a trauma-informed and person-centred approach to engagement, recognising that uncertainty relating to future regeneration proposals may affect residents differently depending on their circumstances.
- Maintain ongoing liaison with relevant council services, support agencies and community organisations where additional support needs are identified.
- Monitor equalities impacts throughout the regeneration programme and update this EIA where significant new information, risks or impacts emerge.
- Ensure future decision-making stages relating to rehousing, demolition and redevelopment proposals are supported by appropriate consultation, engagement and equality impact assessment activity.

8. Outcome of your assessment

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

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

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

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

The decision to issue the Initial Demolition Notices was made at Cabinet in March 2026. The timing and process of issue was delegated to the Corporate Director of Homes & Adult Social Care.

9. Publication

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

10. Directorate and Service Approval

Signatory:	**Name and Job Title:**	**Date:** DD-MMM-YY
Responsible Lead Officer:	Paul Dalton - Programme Manager	03-09-2026
Accountable Manager:	Chantelle Barker – Director Estate Renewal	09-09-2026

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

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

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

Notes and recommendations from EDI Business Partner reviewing this assessment:

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

Equality Impact Assessment (EIA) Form – Demolition/Redevelopment of Nettleton Court & Dudeney Lodge, Hollingdean

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:	**Regeneration/demolition of Nettleton Court and Dudeney Lodge, Hollingdean and wider masterplan site**
Directorate:	Homes and Adult Social Care
Service:	Housing
Team:	Estate Renewal
Is this a new or existing activity?	New
Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)	Yes – Decant Oakley House, Nettleton Court & Dudeney Lodge EIA May 25

2. Contributors to the assessment

Responsible Lead Officer:	Paul Dalton, Regeneration Programme Manager
Accountable Manager:	Chantelle Barker, Director of Estate Renewal
Additional stakeholders collaborating or contributing to this assessment:	Equality Diversity and Inclusion Team

3. About the activity

Briefly describe the purpose of the activity being assessed:

Nettleton Court and Dudeney Lodge - Regeneration of these blocks would mean rehousing of all current tenants, and buyback of leasehold properties. Secure tenants would be made an offer of an alternative property, with the option to return to the new accommodation on the same site once it is built. Wider masterplan and land assembly consideration is being assessed.

What are the desired outcomes of the activity?

To ensure vacant possession of these two buildings without undue inconvenience to the residents, and to provide secure tenants with homes on the new site or elsewhere in the city, with tenures no less secure than present.

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

Council secure councils, Temporary Accommodation and Seaside Homes tenants, resident and non resident leaseholders (and their tenants)

4. Consultation and engagement

We have carried out consultation with residents through door-to-door surveys, individual resident interviews, an online consultation platform, and face-to-face meetings conducted in Nettleton Court and Dudeney Lodge between March and May 2025. Residents were asked comprehensive questions covering housing preferences, concerns about potential changes, current satisfaction, wellbeing impacts, desired improvements, community priorities, and specific needs for future housing.

From the outset of the consultation process, residents were informed that the Council was considering three options for their buildings: strengthening works only, strengthening with comprehensive refurbishment, or complete demolition and redevelopment with new homes.
How Residents Were Informed: Early public meetings: · Community-led discussions: · Extensive face-to-face engagement: Six drop-in sessions, individual tenancy visits. Your Voice Survey: Included a specific question asking residents to choose between "building new homes to replace your current block" and "comprehensive refurbishment of your current block"
Individual consultations: One-to-one appointments where demolition was explicitly discussed as one of the three potential approaches and this was reviewed as part of s105 consultation

- Nettleton Court - 15% response rate, this is 13 individual residents
- Dudeney Lodge - 15% response rate, also 13 individual residents
- Nettleton Court 65% of respondents prefer refurbishment Respondents state: "Strong as Tower of London – don't knock down"
- Dudeney Lodge 65% of respondents prefer refurbishment Strong attachment: "Lived here for 22 years and love it"

These two blocks showed the strongest community attachment out of eight blocks being considered for demolition.

As part of consideration of extending the redevelopment area, a secure council tenant has been consulted.

5. Current data and impact monitoring

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

(State Yes, No, Not Applicable as appropriate)

Age	YES
Disability and inclusive adjustments, coverage under equality act and not	YES
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	YES
Religion, Belief, Spirituality, Faith, or Atheism	YES
Gender Identity and Sex (including non-binary and Intersex people)	YES
Gender Reassignment	NO
Sexual Orientation	YES
Marriage and Civil Partnership	NO

Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	NO
Armed Forces Personnel, their families, and Veterans	NO
Expatriates, Migrants, Asylum Seekers, and Refugees	NO
Carers	YES
Looked after children, Care Leavers, Care and fostering experienced people	YES
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	NO
Socio-economic Disadvantage	YES
Homelessness and associated risk and vulnerability	YES
Human Rights	YES
Another relevant group (please specify here and add additional rows as needed)	NO

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

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

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

Information relating to additional vulnerabilities and protected characteristics will be gathered through individual tenant engagement, including home visits, housing needs assessments, decant planning discussions, and ongoing case management throughout the relocation process. This engagement will enable officers to identify circumstances such as pregnancy or maternity status, caring responsibilities, digital exclusion, health needs, and other factors that may influence the impact of relocation, ensuring appropriate support and mitigations are put in place.

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

Through regular programme monitoring reports and project group meetings

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: people who may be housebound, those under 16, young adults, with other intersections.	YES

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

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

When compared with 2021 Census data, the age profile for Council housing occupants is generally similar to citywide Brighton & Hove residents of all tenures, but occupants of Nettleton and Dudeney tend to be older than both. As at 15th October 2026, 48.31% of occupants in Dudeney Court and 52.69% of occupants at Nettleton Court are over 65 years old, with 5.39% over 80 at Nettleton Court and 7.86% over 80 at Dudeney Lodge with no children under 14 in the blocks. The term 'occupants' here is broader than just tenants and includes other household members such as partners and children. Council tenants themselves tend to be older than other occupants and citywide residents.

We recognise that the needs of older residents may change over the course of the rehousing programme. Rehousing and support plans will therefore be reviewed regularly to ensure they remain appropriate and responsive to changing circumstances. Where appropriate, and with the resident's consent, family members, carers, advocates, health professionals, social workers and other support providers will be involved in discussions to help identify needs and support decision-making. Particular consideration will be given to older disabled residents whose needs may change over time, including those experiencing dementia, cognitive impairment, sensory impairments, frailty, or increasing reliance on formal or informal care and support networks. This will help ensure that rehousing solutions remain suitable, accessible and sustainable in the longer term.

Age Group	Nettleton and Dudeney LPS occupants October 2026	All council housing occupants June 2025	B&H Census 2021
Under 18	0.5%	16%	17%
18 to 39	9.5%	34%	36%
40 to 54	8.2%	20%	22%
55 to 64	26%	14%	12%
65 to 79	43.6%	12%	10%
80 and over	12.2%	4%	4%
Total	100%	100%	100%

Some of the residents in these two blocks may want to explore moving into one of the Council's 24 Seniors Housing Schemes. We will give the residents options around going out to view schemes and where wanted we will try and enable friends and neighbours to move into the same scheme. In 2023/24 we let 116 Seniors Housing flats, in 2024/25 we let 90 homes in Seniors Schemes.

We will ensure mobility needs are met when carrying out assessments for rehousing options. This will take into account mobility needs when agreeing with the secure tenant levels of support with the practical aspects of the move.

Each secure tenant will receive a tailored support package to relocate to another home. Given the broader regeneration plans for the estate, local lettings strategies will be developed to facilitate moves within the wider community with the option of a move back to the newly developed blocks.

We will ensure individual needs are identified and addressed when carrying out assessments for rehousing options. This will include consideration of mobility requirements, physical and mental health needs, sensory impairments, language and interpretation requirements, evacuation and safety needs, and any adjustments required to support independent living. The level of support provided with the practical aspects of the move will be tailored to each secure tenant's circumstances.

Each secure tenant will receive a tailored support package to relocate to another home. This package will take account of a range of factors, including disability, age-related needs, cognitive impairments such as dementia, caring responsibilities, and the support provided by family members, carers and other support networks. We recognise that some residents, particularly older people and those who have lived in their homes for many years, may experience increased stress, anxiety or emotional distress associated with moving. Where required, engagement will be ongoing rather than a one-off process to ensure changing needs and circumstances are identified and appropriate support and accommodation solutions are provided.

While these five blocks remain occupied, investment in them will continue. Secure tenants will be entitled to the same level of compensation and financial support if they move to a new home, as tenants in the other LPS blocks at any point after a Cabinet decision is made regarding development of this site.

SMART ACTION: Each secure tenanted household will have a single point of contact (SPOC). Their role will be to provide practical advice and support. The SPOC will identify additional support as required during the moving process. This may include help with:

- Understanding legal rights.
- Assisting with bidding for properties on Homemove.
- Filling out forms.
- Support with maintaining benefits, accessing discretionary funding.
- Linking into support services
- Providing interpreters.
- Decluttering/downsizing
- Help with removals.
- Arranging utilities.
- Ensuring mobility and adaptation needs are met.
- Disconnection and reconnection of appliances.
- Help with packing and unpacking
- Registering with a GP/local health services
- Viewing properties.

Linking in with other agencies or family members providing support with agreement by the tenant.

6.2 Disability:

Does your analysis indicate a disproportionate impact relating to Disability, considering our anticipatory duty?	YES

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

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

The table below compares the proportion of occupants with a disability record on our Housing Management system which would meet the definition of disability under the Equality Act 2010, which does not include all recorded support needs, for example addiction to non–prescribed drugs or alcohol. This applies to 58% of occupants at Nettleton and Dudeney, which is higher than for all council housing occupants (22%) and citywide residents (19%). The 2021 Census figure is taken from a question which was designed to closely align with the same definition of disability.

Long term health problem or disability	Nettleton and Dudeney LPS occupants October 2026	All council housing occupants June 2025	B&H Census 2021
Yes	58%	22%	19%
No or not recorded	42%	78%	81%
Total	100%	100%	100%

Occupants with disabilities health and safety are at increased risk if they remain in these blocks due to issues with prompt evacuation in an emergency. Our Housing Management system and data collected from site visits indicate 24% of occupants have mobility issues, and 17% self-reported that they would require assistance in an evacuation. The table below presents mobility needs for occupants of Nettleton & Dudeney compared to all council housing occupants, including mobility group where held:

Mobility issues	Nettleton and Dudeney LPS occupants October 2026	All council housing occupants June 2025
Any mobility issues	24%	7%
None recorded	76%	93%

We will ensure individual needs are identified and addressed when carrying out assessments for rehousing options. This will include consideration of mobility requirements, physical and mental health needs, sensory impairments, language and interpretation requirements, evacuation and safety needs, and any adjustments required to support independent living. The level of support provided with the practical aspects of the move will be tailored to each secure tenant's circumstances.

Each secure tenant will receive a tailored support package to relocate to another home. This package will take account of a range of factors, including disability, age-related needs, cognitive impairments such as dementia, caring responsibilities, and the support provided by family members, carers and other support networks. We recognise that some residents, particularly older people and those who have lived in their homes for many years, may experience increased stress, anxiety or emotional distress associated with moving. Where required, engagement will be ongoing rather than a one-off process to ensure changing needs and circumstances are identified and appropriate support and accommodation solutions are provided. Given the broader regeneration plans for the estate, local lettings strategies will be developed to facilitate moves within the wider community, with the option of a move back to the newly developed blocks.

While these five blocks remain occupied, investment in them will continue. Secure tenants will be entitled to the same level of compensation and financial support if they move to a new home, as tenants in the other LPS blocks at any point after a Cabinet decision is made regarding development of this site.

SMART ACTION: Each secure tenanted household will have a single point of contact (SPOC). Their role will be to provide practical advice and support. The SPOC will identify additional support as required during the moving process. This may include help with:

- Understanding legal rights.
- Assisting with bidding for properties on Homemove.
- Filling out forms.

- Support with maintaining benefits, accessing discretionary funding.
- Linking into support services
- Providing interpreters.
- Decluttering/downsizing
- Help with removals.
- Arranging utilities.
- Ensuring mobility and adaptation needs are met.
- Disconnection and reconnection of appliances.
- Help with packing and unpacking
- Registering with a GP/local health services
- Viewing properties.
- Help to identify a Housing parking space at their new property is needed.
- Linking in with other agencies or family members providing support with agreement by the tenant.

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).

To ensure an inclusive and accessible moving process, we will make adjustments tailored to diverse disabled residents, including those who are housebound, D/deaf, blind, neurodivergent, or have non-visible disabilities.

We will provide home-based consultations, alternative communication formats (BSL interpreters, captioning, braille, and audio), sensory-friendly engagement, and specialised mobility support. Housing officers will offer assistance to ensure tenants receive guidance on relocation options, tenancy rights, and financial support.

Recognising intersectionality, we will partner with community organisations to support residents Our approach is to prioritise maintaining social networks, access to essential services, and reducing disruption, ensuring a respectful and equitable transition for all affected households.

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

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

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

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

The table below demonstrates that, there is a lower proportion of residents 19.4% who are Black and Racially Minoritised when compared to the 2021 Census data. While Black and Racially Minoritised residents are not overrepresented within the LPS blocks compared with the wider city population, the council recognises that relocation may affect residents differently. Impacts may be compounded where ethnicity intersects with other characteristics or circumstances, including age, disability, faith or religion, socioeconomic disadvantage, homelessness, or language barriers. Relocation may also affect access to important cultural, faith and community networks. Through ongoing engagement, the council will seek to understand individual circumstances and ensure appropriate support, including interpretation and translation services where required, to mitigate any disproportionate impacts.

Please note that, to allow for comparison with the Census data, the data in the table only reflects occupants with an ethnicity recorded on our Housing Management system: data is not held on this characteristic for around 20% of occupants. Generally, rates of recording of this characteristic are higher for council tenants than for other occupants.

Ethnicity (where provided/recorded)	Nettleton and Dudeney LPS occupants October 2026	All council housing occupants June 2025	B&H Census 2021
White: English, Welsh, Scottish, Northern Irish or British	80.6%	80%	74%
Black and Racially Minoritised (all other ethnic groups)	19.4%	20%	26%

Of the current occupants of Nettleton Court & Dudeney Lodge, around 8% recorded languages other than English on our Housing Management system. These languages include Arabic, Farsi, Italian, Polish, Russian and Thai. To ensure residents are able to fully participate in the decant and rehousing processes, interpretation and translation services will be made available where required. Information will be provided in accessible formats and officers will work with residents to identify and respond to any language, communication or cultural barriers that may affect engagement. This will include consideration of intersecting needs, such as disability, age, digital exclusion or literacy needs, to ensure residents can access information, understand their housing options and make informed decisions throughout the process.

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

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

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

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

Housing staff will be made aware of the need to provide culturally sensitive engagement and support throughout the rehousing process. This may include consideration of religious festivals and observances, family and household arrangements, privacy requirements, and any faith-related requirements

associated with the design or suitability of future accommodation. The assigned Single Point of Contact (SPOC) will discuss these needs with each tenant to ensure they are understood and, where possible, accommodated within rehousing options.

The table below demonstrates that the religion profile of occupants of Nettleton Court and Dudeney Lodge differs from that of all council housing occupants and the wider Brighton & Hove population. There are comparatively higher proportions of Buddhists, Christians and people with other religions, and a lower proportion of people with no religion. The council will work with affected residents to understand any faith-related requirements and ensure these are considered as part of the rehousing process.

Please note that, to allow for comparison with the Census data, the data in the table only reflects occupants with their religion or belief recorded on our Housing Management system or responded that they preferred not to say: data is held on this characteristic for only around one third of council housing occupants (although the rate of recording is higher for just council tenants, at two thirds).

Religion or belief	Nettleton and Dudeney LPS occupants October 2026	All council housing occupants June 2025	B&H Census 2021
Buddhist	5%	1%	1%
Christian	41%	37%	31%
Muslim	4%	6%	3%
Other	7%	5%	1%
No Religion	34%	37%	55%
Prefer not to say	9%	14%	7%
Total	100%	100%	100%

6.5 Gender Identity and Sex:

Does your analysis indicate a disproportionate impact relating to Gender Identity and Sex (including non-binary and intersex people)?	YES / NO

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

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

The table below shows that a much higher proportion of occupants at Nettleton and Dudeney are male (71%) when compared with all council housing occupants and 2021 Census data for residents of Brighton & Hove of all tenures (both 49%).

While a higher proportion of occupants are male, the council recognises that impacts are more likely to arise through the interaction of sex with other characteristics and circumstances, including older age, disability, long-term health conditions, living alone and low levels of social support. A higher proportion of single-person households may mean some residents have less practical or emotional support available during the rehousing process and may be more vulnerable to stress, anxiety or social isolation associated with moving home. Through individual assessments and ongoing engagement, the council will identify support needs, including where assistance from family members, carers or other support networks may be required, to ensure residents are appropriately supported throughout the relocation process.

Gender (Housing data) and Sex (Census data)	Nettleton and Dudeney LPS occupants October 2026	All council housing occupants June 2025	B&H Census 2021

Female	29%	51%	51%
Male	71%	49%	49%
Non-binary	None	0.03%	-
Total	100%	100%	100%

6.6 Gender Reassignment:

Does your analysis indicate a disproportionate impact relating to Gender Reassignment?	NO

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

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

6.7 Sexual Orientation:

Does your analysis indicate a disproportionate impact relating to Sexual Orientation?	YES / NO

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

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

The proportion of residents identifying as Gay or Lesbian is higher (16.6%) within Nettleton Court and Dudeney Lodge than amongst both council housing tenants (4%) and the wider Brighton & Hove population (6%). The proportion recorded as heterosexual (69.6%) is also lower when compared to all council housing occupants (77%) and citywide residents (81%). The council recognises that relocation may affect LGBTQ+ residents differently, particularly where sexual orientation intersects with other characteristics such as older age, disability, living alone, or long-term health conditions. For some residents, established friendship groups, community networks and access to LGBTQ+ inclusive services may be important sources of support and wellbeing. Through individual engagement and rehousing assessments, the council will seek to understand these needs and minimise disruption to support networks wherever possible, ensuring residents can access appropriate accommodation and support throughout the rehousing process.

Please note that, to allow for comparison with the Census data, the data in the table only reflects occupants with their sexual orientation recorded on our Housing Management system or responded that they preferred not to say: data is held on this characteristic for only around half of council housing occupants (although the rate of recording is higher for just council tenants, at two thirds).

Sexual orientation	Nettleton and Dudeney LPS occupants October 2026	All council housing occupants June 2025	B&H Census 2021
Bisexual	2.94%	2%	4%

Gay or Lesbian	16.6%	4%	6%
Heterosexual	69.6%	77%	81%
Other	0%	1%	1%
Prefer not to say	10.86%	15%	9%
Total	100%	100%	100%

6.8 Marriage and Civil Partnership:

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

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

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

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

Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)?	YES / NO

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

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

6.10 Armed Forces Personnel, their families, and Veterans:

Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?	NO

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

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

6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

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

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

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

6.12 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.

Rehousing assessments will consider caring responsibilities and the importance of maintaining proximity to cared-for people, carers and established support networks wherever possible.

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.

Rehousing assessments will consider caring responsibilities and the importance of maintaining proximity to cared-for people, carers and established support networks wherever possible.

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.

12% of the occupants of Nettleton Court and Dudeney Lodge are living in temporary accommodation under statutory homelessness duties. This will increase as secure tenants move out, and leaseholders sell their properties back to the council, enabling additional homes to be used as temporary accommodation in the medium term. This will provide good quality temporary accommodation for households awaiting permanent housing. A dedicated housing team will support these households throughout their occupation of the buildings and will work with them to plan their move when vacant possession is required. We recognise that a future move may cause disruption, uncertainty, stress and anxiety for some households, particularly those who have already experienced homelessness or housing instability. Early planning, clear communication and tailored support will be provided from the outset to minimise the impact of future moves and ensure households understand their housing options, timescales and available support. The council will seek to maximise notice periods wherever possible and will work with affected households to identify suitable alternative accommodation in accordance with homelessness legislation and relevant statutory guidance.

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

Does your analysis indicate a disproportionate impact relating to Domestic Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)?	NO

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

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

6.16 Socio-economic Disadvantage:

Does your analysis indicate a disproportionate impact relating to Socio-economic Disadvantage? (Especially considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections)	YES / NO

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

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

When the process of planning to move starts each household will have a single point of contact (SPOC), they will remain in place until the move is complete and the new tenancy is established. Their role will be to provide practical advice and support, and they will ensure that any communication, interpretation and accessibility needs are identified and met throughout the rehousing process, including for residents experiencing language barriers, disability, sensory impairments, literacy difficulties, age-related needs or digital exclusion.

Non-digital engagement routes will remain available throughout the programme to ensure residents are not disadvantaged by digital exclusion. Information and support will be provided through a range of accessible channels, including face-to-face meetings, telephone contact and written correspondence, to ensure all residents can engage with the rehousing process regardless of their access to, or confidence with, digital technology.

They will provide advice on statutory entitlements to compensation for Home Loss payments for the secure tenants. This mandatory lump sum payment is fixed by Section 30 of the Land Compensation Act 1973. The Government reviews the figure annually. Tenants become eligible for Home Loss payment following a formal decision to demolish, remove or dispose of their homes having been made by Cabinet. In addition, they may get a Disturbance Allowances to cover 'reasonable expenses' involved in moving.

Due to the level of compensation tenants will be entitled to, and the vulnerabilities identified within some households, additional financial support measures will be implemented.

To ensure tenants can make informed financial decisions, we will provide tailored financial advice, offering guidance on managing compensation effectively, understanding rights, and accessing secure financial services. Information will also be provided on identifying financial exploitation, recognising scams, and safeguarding personal assets.

We recognise that some residents may face additional challenges in making financial and housing decisions, including older people, people with disabilities, those with cognitive impairments, and households on low or fixed incomes. Where appropriate and with the tenant's consent, family members, carers and other support networks will be involved in discussions and decision-making. Rehousing assessments will take account of affordability, accessibility, support needs and the suitability of future accommodation to minimise the risk of residents moving to homes that do not meet their needs or leave them financially disadvantaged. Ongoing support will be available throughout the rehousing process to ensure changing circumstances and vulnerabilities are identified and addressed. An enhanced voluntary buy-back offer for leaseholders, resident or non-resident, in the eight LPS blocks was agreed at Cabinet 20 March 2025. Agenda Item 177.

6.17 Human Rights:

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

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

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

The council recognises that relocation engages residents' rights to respect for home and family life. Individual engagement, rehousing support, access to advocacy and opportunities to influence housing options will help ensure these rights are considered throughout the programme.

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

We acknowledge that the displacement may have a significant adverse effect on individuals with multiple protected characteristics. Some tenants may experience a disproportionately negative impact due to intersecting factors such as being racially minoritised, socio-economically disadvantaged, disabled, older, LGBTQ+, or having English as an additional language. Particular consideration will be given to older disabled residents who may experience overlapping impacts relating to mobility, cognition, sensory impairment, long-term health conditions, digital exclusion, and reliance on family, carers or support networks. These intersecting factors may increase the risk of stress, anxiety, social isolation and difficulties accessing information or services during the rehousing process, requiring enhanced and tailored support.

A person's home is deeply connected to their sense of community, personal interests, extracurricular activities, and access to essential resources. As such, relocation may disrupt access to vital services, including education, transportation, religious gatherings, and places of worship, all of which contribute to an individual’s sense of belonging and wellbeing. Relocation can also have implications for mental health, with uncertainty and change potentially leading to increased stress, anxiety, and emotional distress. This issue is closely intertwined with socioeconomic status, ethnicity, faith or religion, and disability.

The location tenants are being moved to, and the accessibility of resources in their new environment, are critical considerations. While financial reimbursement is intended to help alleviate some of these impacts by enabling necessary inclusive adjustments, those affected by multiple protected characteristics may require distinct accommodations that could affect how financial support is utilised.

We will also consider impacts on the wider community unique to this area, such as the disturbance building works may cause to places and groups such as schools, places of worship and healthcare providers.

We remain committed to using the insights gained through consultation to develop a clearer approach to supporting tenants during this transition.

7. Action planning

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

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

1. Provide tailored rehousing support for all affected households

Activities:

- Complete a housing needs and support assessment for households before any move is agreed.
- Develop and review individual rehousing plans, including mobility, disability, health, language, caring responsibilities and support network requirements.
- Monitor progress through case reviews and programme reporting, ensuring any emerging support needs are identified and addressed.
- Achieve SPOC allocation and completed assessments for all tenants

2. Minimise disproportionate impacts on older people, disabled residents and other vulnerable households.

Activities:

- Undertake accessibility, mobility and support needs assessments for all affected households.
- Ensure appropriate property adaptations, parking requirements, assistive technology and support arrangements are considered before a move takes place.
- Provide practical moving support, including packing, removals, utility transfers and liaison with health and care services where required.
- Report quarterly on suitability outcomes, complaints and reasonable adjustments provided.

3. Ensure accessible and inclusive engagement throughout the programme.

Activities:

- Offer translation, interpretation, large print, audio, braille and other accessible formats where required.
- Record communication preferences and accessibility requirements for all affected households.
- Undertake regular engagement with residents who may face barriers due to disability, language, literacy, digital exclusion or other vulnerabilities.
- Review engagement data quarterly to identify and address any groups that are underrepresented in consultation or decision-making processes.

4. Monitor and mitigate cumulative and intersectional impacts.

Activities:

- Maintain and update equality monitoring information gathered through rehousing assessments and ongoing engagement.
- Present quarterly equality monitoring reports to the project governance group, highlighting emerging risks and mitigation measures.
- Review support arrangements for residents experiencing multiple disadvantages, including older disabled residents, LGBTQ+ residents, carers, residents with language barriers and households experiencing financial hardship.
- Update the Equality Impact Assessment annually, or sooner where significant changes to the programme occur.

Which action plans will the identified actions be transferred to?

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

The actions identified through this EIA will be incorporated into the LPS Regeneration Programme Plan, associated resident engagement and communications plans, and monitored through the Directorate EIA Tracker in line with the Council's Fair and Inclusive Action Plan (FIAP) requirements.

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.	

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

9. Publication

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

10. Directorate and Service Approval

Signatory:	**Name and Job Title:**	**Date:** DD-MMM-YY
Responsible Lead Officer:	Justine Harris, Head of Tenancy Services	October 28th 2026
Accountable Manager:	Chantelle Barker – Director of Estate Renewal	October 28th 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 Business Partner to cross-check against aims of the equality duty, public sector duty and our civic responsibilities the activity considers and refer to relevant internal checklists and guidance prior to recommending sign-off.

Once the EDI Business Partner has considered the equalities impact to provide 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 EDI Manager and Head of Service level approval via different templates.

Signatory:	**Name:**	**Date:** DD-MMM-YY
EDI Business Partner:	Eric Page	October 28th 2026
EDI Manager:	Lindsey Pearce	October 27th 2026

Notes and recommendations from EDI Business Partner reviewing this assessment:

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

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