



Brighton & Hove  
City Council

# Overview & Scrutiny

Title:	<b>Overview &amp; Scrutiny Commission</b>
Date:	<b>1 November 2011</b>
Time:	<b>4.00pm</b>
Venue	<b>Council Chamber, Hove Town Hall</b>
Members:	<b>Councillors:</b> Mitchell (Chair), Janio (Deputy Chair), Brown, Follett, Littman, Morgan, K Norman, Powell, Rufus and Summers
Contact:	<b>Tom Hook</b> <b>Head of Overview &amp; Scrutiny</b> 29-1110 tom.hook@brighton-hove.gov.uk

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## OVERVIEW & SCRUTINY COMMISSION

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For further details and general enquiries about this meeting contact Mary van Beinum, Overview & Scrutiny Support Officer, (29-1062, email [mary.vanbeinum@brighton-hove.gov.uk](mailto:mary.vanbeinum@brighton-hove.gov.uk)) or email [scrutiny@brighton-hove.gov.uk](mailto:scrutiny@brighton-hove.gov.uk)

Date of Publication - Monday, 24 October 2011



### PROCEDURAL BUSINESS

#### A. Declaration of Substitutes

Where a Member of the Commission is unable to attend a meeting for whatever reason, a substitute Member (who is not a Cabinet Member) may attend and speak and vote in their place for that meeting. Substitutes are not allowed on Scrutiny Select Committees or Scrutiny Panels.

The substitute Member shall be a Member of the Council drawn from the same political group as the Member who is unable to attend the meeting, and must not already be a Member of the Commission. The substitute Member must declare themselves as a substitute, and be minuted as such, at the beginning of the meeting or as soon as they arrive.

#### B. Declarations of Interest

- (1) To seek declarations of any personal or personal & prejudicial interests under Part 2 of the Code of Conduct for Members in relation to matters on the Agenda. Members who do declare such interests are required to clearly describe the nature of the interest.
- (2) A Member of the Overview and Scrutiny Commission, an Overview and Scrutiny Committee or a Select Committee has a prejudicial interest in any business at meeting of that Committee where –
  - (a) that business relates to a decision made (whether implemented or not) or action taken by the Executive or another of the Council's committees, sub-committees, joint committees or joint sub-committees; and
  - (b) at the time the decision was made or action was taken the Member was
    - (i) a Member of the Executive or that committee, sub-committee, joint committee or joint sub-committee and
    - (ii) was present when the decision was made or action taken.
- (3) If the interest is a prejudicial interest, the Code requires the Member concerned:-
  - (a) to leave the room or chamber where the meeting takes place while the item in respect of which the declaration is made is under consideration. [There are three exceptions to this rule which are set out at paragraph (4) below].
  - (b) not to exercise executive functions in relation to that business and
  - (c) not to seek improperly to influence a decision about that business.

## Agenda Item 39

(4) The circumstances in which a Member who has declared a prejudicial interest is permitted to remain while the item in respect of which the interest has been declared is under consideration are:-

(a) for the purpose of making representations, answering questions or giving evidence relating to the item, provided that the public are also allowed to attend the meeting for the same purpose, whether under a statutory right or otherwise, BUT the Member must leave immediately after he/she has made the representations, answered the questions, or given the evidence,

(b) if the Member has obtained a dispensation from the Standards Committee, or

(c) if the Member is the Leader or a Cabinet Member and has been required to attend before an Overview and Scrutiny Committee or Sub-Committee to answer questions.

### C. Declaration of party whip

To seek declarations of the existence and nature of any party whip in relation to any matter on the Agenda as set out at paragraph 8 of the Overview and Scrutiny Ways of Working.

### D. 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 2 of the Agenda states in its heading the category under which the information disclosed in the report is confidential and therefore not available to the public.*

*A list and description of the exempt categories is available for public inspection at Brighton and Hove Town Halls.*

**BRIGHTON & HOVE CITY COUNCIL  
OVERVIEW & SCRUTINY COMMISSION  
4.00PM 13 SEPTEMBER 2011  
COUNCIL CHAMBER, HOVE TOWN HALL  
MINUTES**

**Present:** Councillors Mitchell (Chair); Brown, Follett, Littman, Morgan, K Norman, Powell, Summers and G Theobald

**PART ONE**

**30. PROCEDURAL BUSINESS**

**30a Declarations of Substitutes**

Councillor G Theobald was substituting for Cllr Tony Janio.

**30b Declarations of Interests**

There were none.

**30c Declaration of Party Whip**

There were none.

**30d Exclusion of Press and Public**

In accordance with section 100A(4) of the Local Government Act 1972, it was considered whether the press and public should be excluded from the meeting during the consideration of any items contained in the agenda, having regard to the nature of the business to be transacted and the nature of the proceedings and the likelihood as to whether, if members of the press and public were present, there would be disclosure to them of confidential or exempt information as defined in section 100I (1) of the said Act.

**RESOLVED:** That the press and public be not excluded from the meeting.

**31. MINUTES OF THE MEETING HELD ON 19 JULY AND CALL-IN MEETING HELD ON 22 JULY 2011**

31.1 The minutes of the meetings held on 19 July and 22 July 2011 were agreed and signed by the Chairman.

**32. CHAIRS COMMUNICATIONS**

32.1 The Chair Councillor Mitchell welcomed everyone to the meeting and mentioned the summary of the OSC workshop of the Corporate Plan that had been circulated to Members.

**33. PUBLIC QUESTIONS/ LETTERS FROM COUNCILLORS/REFERRALS FROM COMMITTEES/NOTICES OF MOTION REFERRED FROM COUNCIL**

33.1 There were none.

**34. CONSULTATION ON THE PROPOSED MERGER BETWEEN EAST AND WEST SUSSEX FIRE AND RESCUE SERVICE**

34.1 Chief Fire Officer, East Sussex Fire and Rescue Service Des Prichard, and Max Hood, County Fire Officer West Sussex Fire and Rescue Service, were welcomed by the Chair Councillor Gill Mitchell.

34.2 Des Prichard thanked the OSC for the invitation to discuss the proposed merger between East and West Sussex Fire Authorities. He first introduced the new Borough Commander for Brighton & Hove, Mark Rist who had recently replaced Keith Ring.

34.3 Potential mergers of fire and rescue services had been mooted since 1970 but the first (Devon and Somerset) did not happen until 2007. Governance arrangements for fire services were changed in 1996, with East Sussex becoming a stand-alone combined fire authority in 1997 while in West Sussex the fire authority continued and still continues to be the County Council.

34.4 East and West Sussex Fire and Rescue Services work very closely together and operate joint training and recruitment facilities. Both are part of a regional consortium to purchase equipment.

34.5 ESFRS aimed to be a cost-effective service, looking to reduce risk and take preventive and protective action wherever possible. Due to grant reductions nationally, a potential shortfall of £1.3 million from 2014 - 2015 had been identified by the East Sussex Fire Authority which represents a large proportion of the total budget of just below £40million. Approximately 80% of expenditure was on staff, national insurance and pension contributions.

34.6 All options had been considered, from 'no change' to a full merger. In his professional view the only option to deliver the required savings would be a full merger and this was now open to the current consultation, Mr Prichard told Members.

34.7 West Sussex Fire and Rescue Service County Fire Officer Max Hood outlined the different savings profile for WSFRS that followed from the comprehensive spending review, and amounted to more than £2.5 million. The details of the proportion of grant relating to the fire service were at present being drawn out in discussion with the Department of Communities and Local Government and the County Council.

34.8 The savings called for either collaboration or a full-scale merger. The rationale and business cases were included in the agenda papers and set out on the two organisations' websites. Mr Hood said operational improvements would be possible via a merger, that would increase resilience, enable a bigger control room with more staff and greater capacity without affecting front-line services. Savings could be found in areas other than fire engines, fire stations and firefighters, he told the meeting.

34.9 There was broad support from Government Ministers for fire service mergers. The proposed merger would make financial sense in his opinion and views are being considered, he said.

34.10 The Strategic Director Place, Geoff Raw explained that the Council was not leading on the proposals but working together with the Fire Services to ensure that the City's best interest was represented, via effective consultation and appropriate feedback.



34.11 Members were concerned about the potential impact on Brighton & Hove taxpayers and about any possible moving away from local control and how to make a merged authority locally relevant. Acknowledging that all Members would be expected to work towards delivering an effective service across the whole of Sussex, there was agreement that BHCC would wish to continue to exert significant influence with the service.

34.12 Members discussed the implications of a Joint Board, which would not seem to offer advantages compared with a merged authority.

34.13 OSC noted that the fire service needs of the City differed from those of rural areas of East and West Sussex and despite Fire Service efforts to reduce risk, most incidents occurred in areas of highest population density. Senior Fire Officers offered to arrange a visit to a fire authority in the region which included a large rural area as well as a Unitary authority.

34.14 The Senior Fire Officers were asked about the timing of the proposed merger in relation to the timescale for disaggregation of funding and setting the budget and Council Tax for WSCC. Members heard that work was in progress to identify current government funding and IT systems, property and investment needs were being investigated. Work on these surveys and the outcome of the public consultation would be completed by mid-October, ready for a final decision in December.

34.15 Asked about gaining agreement for the change between all involved, Mr Hood reassured the meeting that he worked closely with officers and Members who were all committed to an effective service and a sustainable solution. The Joint Steering Group had been working since late 2010. After the consultation there were still further checks and balances and Ministerial 'sign-off' would be required. If a merger were to take effect from April 2013, a Shadow Authority would be formed 6 months beforehand.

34.16 Mr Hood detailed the property arrangements for the fire stations, training centres and headquarters buildings in reply to a query.

34.17 Members questioned the 'Democracy/Accountability' and 'Clarity' ratings in the comparison matrix (report, table 10 refers) asking if five stars for the full merger option and one star for 'no change' were in fact fully justifiable. The meeting was told that representation at a national level would be significantly greater because the proposed authority would be one of the largest in the country. Similarly representation at the Civil Resilience Forum would be significantly more than double. Without a merger, cuts would be needed which may affect progress on community safety because then, the main focus would be on firefighting; whereas a merger would enable more effective service provision and integrated protection and prevention measures. There would be flexibility and capacity to support the differing needs of the City and Districts and Boroughs.

34.18 Operational principles and structures, local identity with the fire stations and work in relation to community safety issues were proposed to remain unchanged. All 13 areas would have 'Commanders' to interface with Local Authorities and local people about driving down risks.

34.19 There were on-going discussions with Trades Unions and staff as there would need to be some reductions when some services such as headquarters and training functions, Human Resources, IT, legal and finance were combined.

34.20 Members wished to offer support to fire services staff living or working in Brighton & Hove who may be at risk of losing their jobs and asked that the Council's Human Resources services be extended in this way during the period of the merger.

34.21 The Commission agreed to support the proposal for a full merger, subject to the business case being finalised. This support was conditional upon the number of Members of the new merged Authority being set at 24 (report table 3.12 refers) to allow for 4 BHCC Members that would enable all Brighton & Hove political groups to be represented. In addition, any change to these governance arrangements would need agreement of all 3 Local Authorities.

34.22 On behalf of OSC the Chair Councillor Gill Mitchell thanked the senior fire officers and wished for a successful outcome.

34.23 **RESOLVED:** That subject to the number of Members of the merged Authority being set at 24 and as minuted above, the proposed merger of Fire and Rescue Services be recommended for approval.

## **35. STRATEGIC USE OF LAND**

35.1 At the invitation of the Chair Councillor Gill Mitchell, the Head of Property and Design Angela Dymott introduced the report on the Strategic use of Land.

35.2 Tony Mernagh, Executive Director, Brighton & Hove Economic Partnership then spoke in more detail about his request for scrutiny and referred to his 8-page paper that had been circulated to Members the previous day as a response to the published report.

35.3 He said it was important that the City's land was developed wisely yet the decision taken by 17 February Cabinet on the sale of land at Patcham Court Farm represented a departure from the Local Plan. He pointed out that the site was identified as employment land in the Local Plan, emerging Core Strategy and the widened planning brief and handed out an extract from the 'Planning Policy Context' of the planning brief highlighting the words '... the Council as local planning authority would expect development proposals for B1(a) or B1(b) uses on the site. Should development proposals seek 'enabling' development in the form of alternative employment-generating uses (eg a hotel/leisure use) a sufficiently strong planning case would need to be made as part of any planning application.'

35.4 '... as a minimum there should be no net loss in employment floor space and seek to provide for at least as many jobs' was underscored.

35.5 He asked whether the land could be put to better use, how the successful bidder became successful, whether the departure could be justified in terms of the quality and quantum of jobs that would be created, and the whether Economic Development officers were involved in the sale decision.

35.6 Mr Mernagh referred to alternative options that he said would have produced 15 times the quantum and quality of jobs and been of greater economic benefit to the city. He questioned what message this sent to other potential developers intending to comply with the brief, who would have been at a disadvantage?

35.7 The Chair Councillor Gill Mitchell reminded the meeting that the decision on the sale of the land had been taken. The role of OSC was to consider if there were lessons to be learned for the future. The strategic use of land was pertinent to the current review of the Core Strategy.

35.8 Answering questions the Head of Property and Design said the bids were subjected to a rigorous evaluation with individual scoring against 8 criteria: track record; deliverability; financial appraisal; funding; planning (including adherence to the planning brief and the Local Plan) quality/innovation. A panel of 7 comprising 5 officers including a representative of the planning team had individually scored all those interviewed. In Part 2 closed session 17 February Cabinet were aware of the scores of the 5 shortlisted candidates and de Vere Hotels had the highest score.

35.9 Members felt the questions were not unreasonable but asked officers about the merits of the request for scrutiny and whether more time was needed to consider Mr Mernagh's reply.

35.10 The Principal Planning Officer Strategy Alan Buck pointed out that planning issues would be tested at a future date, at the planning application stage when Members would consider any application against the Local Plan as adopted and other material considerations and would be aware of departures. There had been other instances of significant departures, such as the Amex Stadium. The planning brief was not intended to be a full reflection of policy and carried a caveat to the effect that it is an informal advice note.

35.11 The Strategic Director Place Geoff Raw stated that under ideal circumstances development proposals would match exactly with strategic plans for the Council's property assets. He said the review of the core strategy and review of land assets was an opportunity to look again at how decisions are made. That was not to say, the decision on Patcham Court Farm was wrong; he was satisfied with the position taken.

35.12 In reply to questions, the Head of Property and Design told Members that Economic Development officers were involved in the revised development brief and marketing brief, and in previous asset sales. They were not involved in the interviews, though there was close working and informal input.

35.13 In Mr Mernagh's view, greater involvement of Economic Development was important. Clarity and transparency of decision-making was also key, so that potential developers had a clearer picture of what would be acceptable. He told the meeting in strong terms that a number of potential developers were dissatisfied.

35.14 The Chair wished to ensure that concerns were addressed in full and lessons could be learnt for future sites. Members noted the current review of the Core Strategy and the new national planning policy framework expected in December that would require Local Authorities to be more specific about employment land.

35.15 A scrutiny panel was proposed but the timescale for reporting back and the risk of duplication of existing work on the Core Strategy were reasons this was not agreed. BHEP has the opportunity to make representations on the Core Strategy during the statutory consultation process.

35.16 After discussion it was agreed that questions on the strategic use of land raised by the BHEP, and focusing on learning lessons from the process, should be sent to the Cabinet Member and replies circulated to OSC Members and BHEP.

35.17 OSC also wished to comment on the Employment section in the revision of the Core Strategy If the timetable allowed.

### **Economic Development**

1. What is the involvement of the Economic Development team in decisions and could this be strengthened?
2. How are proposals' impacts on the local economy evaluated during decision-making?

### **Decision-making process**

3. Can the process for achieving the best strategic use of land for the benefit of the City and its residents, be made more robust for the future?
4. Is there a more transparent way to demonstrate that alternative proposals have been properly considered?

### **Evidence**

5. Where there are significant departures from current strategies plans and studies; should additional research be undertaken e.g. on the impact of proposals on existing provision, employment generation especially including graduate level jobs, and wider social, economic and environmental benefits to the City and National Park?

### **Consultation**

6. Is there scope for consultation with interested parties to be improved e.g. with more time allowed for queries or responses prior to a final decision being made?

**35.18 RESOLVED** (1) that on behalf of OSC the Chair write to the Cabinet Member for Planning, Economic Development and Regeneration for a reply to the questions raised at 35.16.

(2) that during the revision of the Core Strategy a request be made for the Employment section to be brought to OSC if timing allowed.

### **36. UPDATE FROM O&S COMMITTEES - ASCHOSC**

36.1 Chair of ASCHOSC Councillor Ken Norman said the committee is made up entirely of new members and had met only twice. ASCHOSC includes co-opted member from LINK .

36.2 Useful presentations from Denise D'Souza about Adult Social Care, and Jugal Sharma and Nick Hibberd about Housing issues had been heard and this would continue. Accommodation & Support for People with Learning Disabilities has also been looked at.

36.3 A workshop on community meals was being arranged

36.4 ASCHSOSC is planning to do some joint work with the Children and Young People's Overview and Scrutiny Committee (CYPOSC) later in the financial year to look at the council's approach to youth homelessness and what happens to young people leaving care in terms of housing.

36.5 The Committee had not yet received any full requests for scrutiny.

**37. OSC WORK PLAN**

37.1 The work plan was noted.

**38. ITEMS TO GO FORWARD TO CABINET MEMBER, CABINET OR FULL COUNCIL**

38.1 The proposed Fire Service merger would be considered by 22 September Cabinet.

The meeting concluded at 5.45pm

Signed

Chair

Dated this

day of



### The role of Disability Spokesperson

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The Disability Spokesperson aims to be an advocate for **all** disabled people in the City, including those working in Brighton & Hove City Council; giving a voice and representing their views through the Administration and Cabinet role where decisions or changes might affect them.

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In general:

- Champions disability across the Council / City
- Is committed to equalities and recognises the abilities and potential of all
- Understands that society and culture disable people, not 'medical conditions' and strives to eradicate negative perceptions of disabled people (the 'social' model)
- Shares information, ideas and innovations with others and encourages and motivates others to get involved
- Helps to find enabling solutions by considering accessibility and inclusion in all aspects of our work
- Uses messages of support and quotes in news releases, the website and newsletters
- Attends and speaks at key events and development events relating to disability
- Keeps abreast of developments nationally that impact on disabled people's lives

To act specifically as a focus in the Council by:

- Engaging with disabled workers and supporting networks
- Challenging staff and elected members to promote inclusion for disabled people across all services and functions and ensuring the level of commitment to this position from the highest levels within the organisation
- Taking a strategic role in influencing policy, training, support etc
- Promoting the council's Public Sector Equality Duty and action plan (both within and external to the organisation)
- Understanding and effectively representing the priorities for the council in terms of disability equality.
- Understanding the vision and goals of the organisation and influencing the strategy for developing disability confidence
- Keeping up to date in relation to developments in the law or in best practice (for example, the implementation of the Equality Act)





# OVERVIEW AND SCRUTINY COMMISSION

## Agenda Item 43

Brighton & Hove City Council

<b>Subject:</b>	<b>Brighton &amp; Hove City Plan: Consultation on Policy Options Papers (Employment Policy)</b>		
<b>Date of Meeting:</b>	<b>OSC 1 November 2011</b>		
<b>Report of:</b>	<b>Strategic Director, Place</b>		
<b>Contact Officer:</b>	<b>Name:</b>	<b>Helen Gregory</b>	<b>Tel: 29-2293</b>
		<b>Liz Hobden</b>	
	<b>Email:</b>	<b>Helen.gregory@brighton-hove.gov.uk</b>	
<b>Ward(s) affected:</b>	<b>All</b>		

### FOR GENERAL RELEASE

#### 1. SUMMARY AND POLICY CONTEXT:

- 1.1 In July 2011, Council agreed to withdraw the Core Strategy to allow it to be updated and amended. This has been agreed by the Secretary of State and the Core Strategy has been withdrawn. In September 2011, Cabinet agreed a new work programme to prepare the City Plan. Consultation on the draft City Plan (to replace the Core Strategy) will take place early next year (March and April 2012)
- 1.2 As part of preparing the draft City Plan it was considered necessary to undertake a period of consultation on four specific policy areas where important changes are proposed. These policy areas are: Housing targets and the housing delivery strategy, Park and Ride (Transport) policy, employment policy and a new student housing policy. The 13 October Cabinet approved the Policy Options Papers for consultation. The focus of this Overview and Scrutiny Commission is the Employment Policy Options Paper.

#### 2. RECOMMENDATIONS:

- 2.1 That Overview and Scrutiny note the content of the Employment Policy Options Paper.
- 2.2 That Overview and Scrutiny Committee refer any comments that may be agreed on the Employment Options Paper to the Executive to inform the preparation of the draft City Plan.

#### 3. RELEVANT BACKGROUND INFORMATION/CHRONOLOGY OF KEY EVENTS:

- 3.1 In July 2011, Council agreed to withdraw the Core Strategy to allow it to be updated and amended. This has been agreed by the Secretary of State and the Core Strategy has been withdrawn. The need to amend the document arose from soundness issues raised in relation to housing delivery at an Exploratory Meeting with the appointed Planning Inspector in May 2010.
- 3.2 The need to update the document also arises from the number of significant changes that have happened since the document was submitted to the Secretary

of State a year ago. These include proposed changes to national legislation and guidance (Localism Bill and draft National Planning Policy Framework). Reflecting these changes will help to secure an effective, up to date and sound document.

3.3 The need to amend the Core Strategy presents a real opportunity to prepare a City Plan with greater potential (than the previously submitted Core Strategy) to plan for the future of the city. The City Plan will be an important tool for attracting and directing investment in the city. It will provide an imperative for delivering much needed affordable homes and for encouraging the most sustainable forms of development with the highest quality of design.

3.4 The Employment Options Paper is one of four options papers being taken out to consultation between 17 October and 2 December. The aim of the paper is to clarify and strengthen how the City Plan will support sustainable economic growth in the city. This is in response to:

- consultation responses received during the last consultation on the Core Strategy's employment policies (requesting further clarity and raising issues of the deliverability of the Core Strategy's approach to accommodating new office accommodation)
- the current financial difficulties in securing finance for new office developments,
- potential changes proposed in the National Planning Policy Framework; and;
- the need to consider the role some sites can play in delivering additional housing supply.

The options generated to tackle these issues also reflected the opportunity indicated in the draft NPPF that the government would no longer prescribe what a local plan would contain. This suggested that it would be possible to include strategic employment allocations and to identify the hierarchy of industrial sites referred to in the Submitted Core Strategy in the City Plan Part 1 rather than leave employment allocations to part 2 of the Plan. The choice of preferred options was informed by the evidence as summarised below and the findings of the Sustainability Appraisal.

3.5 Evidence suggests that Brighton & Hove's economy may be more resilient than during the previous economic slow down. In a study produced by the HSBC (Future of Business Report 2011) Brighton has been recognised as one of five 'Supercities' that will lead the country's economic recovery. Brighton & Hove is a city of entrepreneurs with many more very small businesses than the national average. A growing population means the city needs to find 6,000 jobs by 2014 if it is to maintain its employment rate of 71% (City Employment & Skills Plan 2011-2014).

3.6 There is also strong evidence to indicate that the council should continue to protect the city's employment sites and premises (City Employment and Skills Plan 2011-14, the Business Retention and Inward Investment Strategy 2009, The Employment Land Study 2006 and revised 2009 and the Creative Industries Workspace Study 2007). Both the protection of employment sites and the development of new high grade employment space are fundamental to the economic wellbeing of the city to allow businesses to prosper and grow.

- 3.7 Maintaining a portfolio of employment sites, for example, provides the opportunity for the targeting and support of growth sectors such as environmental technologies to support a low carbon economy. However, the council is concerned that there has been an erosion of employment sites and premises in recent years due to increasing pressure for non-employment uses, particularly residential uses, on sites and in vacant offices.
- 3.8 The Employment Options Paper also recognises the potential government changes to planning rules that could allow commercial premises to be converted to residential without the need for planning permission (DCLG consultation April 2011) but the preferred approach set out in the Paper reflects the council's response to the DCLG consultation which raised serious concerns on the impact such a change could have on the council's employment land.
- 3.9 Looking at the forecast scenarios for employment growth in the city, there is the need for an additional 20,000 sq m of B1a office floorspace in the city post 2016 (Employment Land Study 2006). The strong environmental constraints that make the city such an attractive place to live mean that most employment land will have to be found by recycling existing employment sites and premises and other redundant sites. The Paper recognises that carefully managed mixed-use development can yield more intensive use of under-utilised employment sites to deliver high quality employment space, job growth and contribute to delivering much needed new homes.
- 3.10 Through the City Plan the council's preferred approach will be still to identify development areas where opportunities for growth, regeneration and/ or inward investment will be directed. The development area policies will specify the amount and type of development that is anticipated to come forward during the plan period (2010-2030) and how the council will support and encourage this development to come forward. The preferred options in the Policy Options paper propose to:
- Specifically identify and safeguard Central Brighton as the city's primary office area to accord with the council's aspirations for central Brighton to be a vibrant employment location and respond to the need to safeguard commercial space in suitable locations to allow the city to grow as an economic base for the wider economic area.
  - Identify and allocate a range of sites to accommodate the forecast need for an additional 20,000 sq m of office floorspace within the New England Quarter and London Road Development Area as a more flexible and viable way of bringing forward new office floorspace.
  - Allocate strategic employment sites and identify their proposed role within the Development Areas to clarify and provide certainty to landowners and developers on the council's preferred approach to securing regeneration, inward investment and high quality modern employment floorspace and, where appropriate, employment-led mixed use development.
  - Identify a hierarchy of industrial estates/ premises by allocating those sites which will continue to be safeguarded for business, manufacturing and warehouse use and where refurbishment and improvement will be encouraged and also allocating those assessed as suitable for employment-led mixed use development where the twin benefits of high quality modern business floorspace and additional housing requirements can be achieved.

- Continue to safeguard secondary employment sites to ensure a good supply of appropriate employment land to serve the city's economy.

#### **4. COMMUNITY ENGAGEMENT AND CONSULTATION**

- 4.1 Consultation on the Policy Option Papers started 17 October 2011 and runs until the 2 December 2011. The Policy Options Papers are available to download or view on the council's online consultation portal (website) as well as the city's deposit points. The Policy Options papers are being discussed with the relevant city partnerships that sit below the local strategic partnership and at a specific workshop event on 9 November to which representatives of the business sector have been invited and a specific event is being organised by the Brighton and Hove Economic Partnership to discuss the Policy Options Papers on 16 November. Similar events with the BHEP took place during the various stages of consultation on the Core Strategy.
- 4.3 The Cross-Party Working Group on the City Plan was advised of the two stage approach to consultation and the need for option papers for policy areas requiring significant change.
- 4.4 Consultation on the Policy Option Papers accords with the approach and standards set out in the council's adopted Statement of Community Involvement (the city council's policy for involving people, communities and stakeholders in preparing plans).

#### **5. FINANCIAL & OTHER IMPLICATIONS:**

##### Financial Implications:

- 5.1 There are no Capital Expenditure implications. The costs of preparation and consultation for the Policy Option Papers are being met from within the existing Planning Strategy and Projects revenue budget.

Finance Officer Consulted: Karen Brookshaw Date: 13/10/11

##### Legal Implications:

- 5.2 The draft City Plan will update and amend the withdrawn Core Strategy which is one of a series planning documents introduced under the Planning and Compulsory Purchase Act 2004. Once adopted the City Plan will be the development plan for the city against which planning applications will be assessed. Procedural requirements for drafting and adopting such documents are contained in the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended). The consultation on the Policy Options Papers will be carried out in accordance with the aforesaid Regulations.
- 5.3 No human rights implications arise from the Report.

Lawyer Consulted: Hilary Woodward Date: 17/10/11

##### Equalities Implications:

- 5.4 Equalities issues have been and will continue to be relevant to a number of issues within the development plan document, particularly in relation to reducing inequalities, providing community facilities and providing housing for all, including gypsies and travellers. Previous community involvement specifically attempted to reach the various communities of interest and a previous version of the Core Strategy was subject to an Equality and Health Impact Assessment.

Sustainability Implications:

- 5.5 The planning system has a clear purpose to contribute towards the achievement of sustainable development. All planning documents will be appraised for their economic, social and environmental impacts. The Policy Options Papers have been subject to a Sustainability Appraisal.

Crime & Disorder Implications:

- 5.6 The City Plan will address crime and disorder through development areas, special area policies and a number of citywide policies.

Risk and Opportunity Management Implications:

- 5.7 The risks within this project are regularly reviewed through quarterly highlight reports. Consulting on the council's preferred approach to policies requiring significant change will help ensure a sound development plan document can be justified and should ensure that there are fewer objections to the plan, or issues arising at a late stage. A Cross Party Working Group has been established to enable these policy options to be discussed at an early stage therefore reducing uncertainty when key decisions are made.

Public Health Implications:

- 5.8 The City Plan will address the healthy planning agenda through a city wide healthy city policy and the various policies redressing inequality. A previous version of the Core Strategy was subject to an Equality and Health Impact Assessment.

Corporate / Citywide Implications:

- 5.9 The City Plan will be a significant factor in steering development in the city for the next 20 years. It will contribute to delivering plans and strategies across the city council directorates, along with the Sustainable Community Strategy. It will also help to deliver city-wide strategies of public and voluntary sector partners.

**6. EVALUATION OF ANY ALTERNATIVE OPTION(S):**

- 6.1 The process of preparing a development plan document is to test alternative policy options. This testing includes consultation, a robust evidence base and a Sustainability Appraisal. Given the significance of change proposed to four policy areas it was considered necessary for these to be fully tested through an additional 'issues and options' stage.

**7. REASONS FOR REPORT RECOMMENDATIONS**

- 7.1 To enable the Overview and Scrutiny Commission to consider and comment on the detailed proposals in the Employment Policy Options Paper.

### **SUPPORTING DOCUMENTATION**

#### **Appendices:**

1. Employment Policy Options Paper

#### **Documents in Members' Rooms**

1. Sustainability Appraisal of Policy Options Papers

#### **Background Documents**

1. 7 July Planning, Employment, Economy & Regeneration Cabinet Member Meeting Government Consultation Relaxing Planning Rules For Change Of Use From Commercial To Residential
2. 14 July Council Withdrawal of Core Strategy
3. 22 September Cabinet Revised Local Development Scheme 2011-2014
4. 13 October Cabinet Consultation on Policy Option Papers for the new City Plan
5. Submitted Brighton & Hove Core Strategy

# Consultation on Policy Options Papers for Brighton & Hove's City Plan

October 2011

## Employment Policy Options Paper



Brighton & Hove  
City Council





## Employment Policy Options Paper

### 1. Introduction

1.1 Evidence suggests that Brighton & Hove's economy may be more resilient than during the previous economic slow down. In a study produced by the HSBC (Future of Business Report 2011) Brighton has been recognised as one of 5 'Supercities' that will lead the country's economic recovery. The city has become an alternative business location due to its close proximity and easy access links with London (and Gatwick airport) together with more affordable rental levels for high quality space and it is considered seriously as a business location building on the business sectors that are located here. The key sectors that have been identified for growth are digital media, creative industries, finance, health and environmental technologies, all of which have a growing presence in the city.

1.2 There are 263,300 people living in Brighton & Hove in 2011 according to latest ONS data and current projections suggest that the city's population could increase by 4.8% or 12,650 over the next ten years. If these projections prove accurate, the city may need to find work for an additional 6,000 residents by 2014 just to keep the employment rate at the current level of 71.1%. However these need to be quality jobs that allow people to progress and to earn incomes that will enable them to live successfully and sustainably.

1.3 The City Plan will set the framework for future development in Brighton & Hove up to the year 2030. Therefore both the protection of employment sites and premises and the development of new high grade employment space are fundamental to the economic wellbeing of the city to allow businesses to prosper and grow and are key issues for the City Plan to address.

### 2.0 Evidence Base

2.1 A number of studies have been produced in the past 5 years looking at the need for commercial space in the city including the City Employment and Skills Plan 2011-14, the Business Retention and Inward Investment Strategy (2009), The Employment Land Study (2006 and revised 2009) and the Creative Industries Workspace Study (2007). All these studies identified the need for commercial space to meet the needs of the city, businesses currently located here and businesses considering Brighton as a business location to allow the city to grow as an economic base for the wider economic area.

2.2 In particular there is the need for high quality office floorspace (Grade 'A' floorspace) and flexible and affordable business floorspace. Developments with floorplates of 500 sqm (c.5,000 sq ft) are considered the optimum size floorplates for the city as they have the ability for single occupancy or easy sub-division to meet demand. Recent evidence shows encouraging number of requirements for office space in excess of 1,000 sq m from a variety of different sectors (e.g. finance, insurance, IT, professionals and healthcare). Whilst many companies would still prefer to own rather than rent, they are finding it much more difficult to obtain finance.

2.3 Looking at the forecast scenarios for employment growth in the city, there is also the need to accommodate an additional 20,000 sq m of B1a office floorspace in the city post 2016 (Employment Land Study 2006). The strong environmental constraints that make Brighton & Hove such an attractive place to live, mean that most new employment floorspace will have to be found by recycling existing employment sites and premises and other redundant sites.

The supply of employment land and premises has been maintained by redevelopment and the more effective and efficient use of existing sites or by the refurbishment and modernisation of existing buildings. However there has been in recent years an increasing pressure for non-employment uses, particularly residential on some sites and in vacant offices and the council is concerned with the erosion of employment sites and premises.

**2.4** Through the City Plan the council's preferred approach will be still to identify development areas where particular opportunities for growth, regeneration and/ or inward investment will be directed. These development area policies will specify the amount and type of development that is anticipated to come forward during the plan period (2010-2030) and how the council will support and encourage this development to come forward.

**2.5** However through the withdrawal of the Core Strategy there is the opportunity to clarify and strengthen the City Plan with regards to the following issues:

- Issue 1 - Recognition and support of the city's primary office area
- Issue 2 - Accommodating the need for 20,000 sq m additional office floorspace
- Issue 3 - Maintaining an adequate supply of appropriate, affordable office accommodation
- Issue 4 - More specific mention of strategic employment sites and their roles within Development Areas.
- Issue 5 - An appropriate hierarchy and protection of industrial estates and premises that encourages their refurbishment and upgrade
- Issue 6 - Maintaining an adequate supply of appropriate, affordable business, manufacturing and warehouse accommodation

Each is considered in more detail below.

### **3.0 Issue 1 Recognition and support of the city's primary office area**

**3.1** The city's office market is principally focused on central Brighton, although there are several well established office locations within Hove, such as, City Park and Preston Road. However, more generally, the core office areas are located on the east and southern side of Brighton Station, within the New England Quarter, interspersed within the city centre. Much of the existing office stock is within older purpose built buildings or converted period buildings. Apart from the new Amex House, due to be completed in December 2011, the City Park development adjacent to Hove Park, in 2005/06, and Trafalgar Place adjacent to Brighton station, completed in 1991/92 were the last major office developments in the city. This lack of substantial new stock, especially in the central area, has resulted in Trafalgar Place continuing to be regarded as the city's prime office development some 20 years later. More recently there has been a small amount of new build as part of the New England Quarter redevelopment. Refurbishment and upgrading of older buildings, such as at Queensbury House in Queens Road has occurred.

3.2 The City Plan will continue to recognise central Brighton<sup>1</sup> as a vibrant employment location attractive to businesses, employees and visitors to the City and an area where a coordinated policy approach will be taken (as previously set out in the withdrawn Core Strategy as SA2 Central Brighton). Over the timeframe of the Plan, central Brighton will continue to remain a location where high quality offices will be demanded. It is therefore felt appropriate that a more positive, proactive approach to meeting the development needs of businesses looking to locate in central Brighton is set out in the City Plan.

**Option 1:**

Identify within the central Brighton special area policy, central Brighton as the city's primary office location and protect existing office accommodation and encourage their refurbishment and upgrade. In recognition of the variety of type and quality of accommodation within central Brighton the policy would include flexibility around changes of use and redundancy. The policy would also set out the proposals to encourage the delivery of outstanding development opportunities that would secure additional office floorspace in the area.

**Advantages:**

- Provides a clearer indication of the role central Brighton plays as the city's prime office location.
- Accords with the council's aspirations for central Brighton to be vibrant employment location attractive to businesses, employees and visitors to the City.
- Responds to the need to safeguard commercial space in suitable locations to allow the city to grow as an economic base for the wider economic area.
- Responds to the need for high quality commercial space in the city.
- Would enable an article 4 direction to be applied to central Brighton if potential changes to the planning system that the Government has consulted on are implemented to allow for change of use from office to residential use without the need for planning permission.

**Disadvantages:**

- May be seen as prescribing to the market where office developments should be located.
- Could be seen as contrary to potential changes to the planning system that the Government has consulted on that might allow for change of use from office to residential use without the need for planning permission.
- If the Government relaxes planning rules to allow for change of use from office to residential without the need for planning permission there would be a cost implication for adopting an Article 4 Direction for central Brighton.

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<sup>1</sup>Central Brighton extends from Brighton Station in the north to the seafront in the south; with North Laine, The Lanes, The Royal Pavilion Estate and Old Steine to the east and the major seafront hotels, conference centres, Churchill Square shopping centre and major high street retailers along Western Road to the west.

**Option 2:**

Not to identify within the Central Brighton special area policy the areas role as the city's primary office location and leave the protection of the office accommodation to be dealt with a generic employment protection policy.

**Advantages:**

- Would be more flexible if the market changes its preferred location for office developments.

**Disadvantages:**

- Weakens the Plan's ability to safeguard needed office accommodation and encourage the refurbishment and upgrade of office accommodation.
- Does not reflect the role central Brighton plays as the city's prime office location.

## **4.0 Issue 2 - Accommodating the need for additional office floorspace**

**4.1** The previous version of the Plan identified the New England Quarter and London Road Development Area as the preferred location to secure the additional 20,000 sq m new office floorspace required to meet the identified forecast need post 2016 (Employment Land Study 2006). This was in recognition of its proximity to the city centre with excellent transportation links, the successful redevelopment of Brighton Station site, the existing creative industries hub in this location, and significant opportunities for more effective and efficient use of existing employment sites in the area (London Road Central SPD).

**4.2** The council is not changing the preferred approach set out in the withdrawn Core Strategy that the additional office need is directed to the New England Quarter and London Road Development Area. However, it is reconsidering the options for how that additional office need is delivered.

**4.3** Concerns were expressed with the withdrawn Core Strategy over the deliverability and viability of the proposed approach to bringing forward large scale office developments in the city (set out in DA4 New England Quarter and London Road Development Area). Taking into account the current difficulties of securing finance for office developments and the need to ensure that this policy delivers the type and size of office floorspace of greatest demand in the city a revised approach to accommodating the forecast need for a further 20,000 sq m office floorspace post 2016 is considered necessary.

**4.4** It is essential that the sites identified to accommodate the additional office floorspace can be developed within the timeframe of the City Plan Part 1 (2010-2030) and are appropriate. As a consequence potential sites have been assessed against the following criteria:

- Availability - whether the site is available now, or likely to be available for development within the timeframe of the City Plan Part 1.
- Suitability - whether the site is in an appropriate and sustainable location (such as whether it offers easy access to public transport and whether the development would adversely affect the character of the area)
- Viability - whether office development is considered economically viable on the site. See appendix 1 for assessments.

### Option 1

Through redevelopment and more intensive use of a number of employment sites accommodate a proportion of the 20,000 sq m of office floorspace in the New England Road, New England Street and Providence Place area. The specific site opportunities identified include:

- Vantage Point, Elder Place (including Circus Parade)
- Trade Warehousing (Longley Industrial Estate) 4-6 New England Street
- Richardson's Scrapyard and Brewers Paint Merchant Site, New England Street

The remainder of the 20,000 sq m will be achieved through outstanding opportunities/ existing permissions for B1a office floorspace to be delivered at:

- Block J and K Brighton Station Site
- Cheapside (south between Blackman Street and Whitecross Street)
- Blackman Street Site (land adjacent to Britannia House)
- GB Liners site, Blackman Street
- City College site, Pelham Street

#### Advantages:

- A specific policy which identifies a range of site to meet the forecast requirements will address the issues of deliverability by indicating where and how the additional floorspace will be brought forward.
- Provides flexibility to accommodate change should some of the sites fail to deliver.
- A more sites specific policy could also indicate an appropriate mix of uses considered acceptable to ensure the viability of bringing forward the office floorspace.
- Spreading the need across a number of sites would also ensure the delivery of the needed floorspace rather than relying on one/ two sites.
- Spreading the need across a number of sites would also reflect that that new office floorspace would not all come onto the market at once.
- A more specific policy can clarify the type of business space required and amounts of development that the sites could deliver.
- A strengthened policy gives the opportunity to emphasise the proactive, positive role council will play in improving quality of public realm and transport to improve the attractiveness of the area as an office location.

#### Disadvantages:

- May be seen as too detailed/ prescriptive.
- Accommodating the 20,000 sq m is reliant on implementation of a number of outstanding planning permissions.
- Would need clarity on minimum amounts of office floorspace expected to come forward on sites to ensure that the new office provision is deliverable and viable.

### **Option 2**

Through the identification of New England Road and London Road Area as the broad location suitable for accommodating 20,000 sq m of additional office floorspace with allocation of sites to be taken forward in the City Plan Part 2.

#### **Advantages:**

- Provides flexibility as to how the office accommodation is brought forward.
- Accords with PPS12 guidance around the role and content of Core Strategies.

#### **Disadvantages:**

- Criticism of this approach (set out in the last version of the plan) was that it didn't provide sufficient certainty over how the 20,000sq m was to be delivered; respondents felt that sites should be identified in detail and actions put in place to bring sites forward for development.

### **Option 3**

Strategic allocation of two sites within the New England Quarter and London Road Development Area to accommodate the additional 20,000 sq m additional office floorspace.

#### **Advantages:**

- Clearer identification of sites anticipated to accommodate additional office floorspace.
- Would provide the city with high quality large scale office accommodation suitable for significant inward investment opportunity

#### **Disadvantages:**

- Given the difficulty of financing office development in the short to medium term it is considered unlikely that offices of these scales would be brought forward speculatively.
- Does not match the greatest volume of demand in terms of office floorspace requirements.

## **5.0 Issue 3 - Maintaining an adequate supply of appropriate, affordable office accommodation**

5.1 Between 1998 and 2008 the private sector employment base of the city grew by 24.8%. In 2008 there were 13,422 businesses in the city. The city of Brighton & Hove has the third highest business stocks per head in England & Wales. Brighton & Hove has a strong entrepreneurial culture, reflected by high levels of start-ups compared with other cities. In 2008 Brighton & Hove had the 6th highest levels of start-up business activity in the country and more recent data suggest the city continues to have a higher than average level of business start up compared with the average for England (BankSearch survey, July 2011).

5.2 Overall, Brighton & Hove has a larger proportion of small and micro businesses employing less than 10 people, and lower proportions of all other sized businesses 86.4% of businesses employ less than 10 people. With the predominance of businesses in the city employing less than 10 people there is continued demand for smaller floorplate office space and this will continue.

5.3 Alongside the specific proposals for Development Areas and the proposed preferred approach set out earlier under Issue 1 to identify central Brighton as the primary office location where existing office accommodation would be protected there is a need to consider the approach to secondary office accommodation. Alternative office accommodation can be found in clusters elsewhere in the city (such as City Park and Preston Road) and scattered across the city. Secondary office accommodation can be found within older purpose built buildings or converted period buildings, upper floor accommodation above shops small workshop style/ mews or modern flexible managed office space/ business centres. The council considers that a good supply of appropriate employment land should continue to be safeguarded to allow for a broad range of business types to serve the city's needs. However the Housing Delivery Options Paper does include some secondary office sites as a potential source of additional supply of housing sites.

#### Option 1

**General policy of protection of secondary office accommodation unless redundancy proven with no preference given to alternative uses.**

##### Advantages:

- Provides landowners/developers with the flexibility for future changes of use from employment land.
- Smaller office spaces more easily adapted to residential use and this would provide a supply of 'windfall' residential sites where redundancy is proven.

##### Disadvantages:

- Without protection these sites/ premises will be lost to the office market making it harder for small businesses to find space, inflating the rental values of the office space that is left making it less affordable to businesses in the city to remain.
- Housing land often has a higher land value, and this has led to developers looking at employment land to provide new housing. The Council's Employment Land Study highlights the importance of protecting land currently in employment use.
- General policy may not be possible without city wide Article 4 Direction if government policy goes through as was consulted upon in April 2011 (the potential relaxation of the planning rules for change of use from business to residential).

#### Option 2

**Set out a general policy of protection for secondary office accommodation unless redundancy proven but require reuse for alternative employment generating uses and/or affordable housing only (the proportion to be determined following an update of the Affordable Housing Viability Study).**

##### Advantages

- the city still needs to deliver a greater quantity of higher value of economic activity for both its resident population and for the wider South East economy, these opportunities will in the main come from the existing portfolio of employment sites.
- Housing need is a pressing issue in the city and seeking a viable proportion of affordable housing on redundant employment sites will meet the council's priorities to bring forward affordable housing.

### Disadvantages

- Too prescriptive and does not provide sufficient flexibility for future changes of use from employment land.
- General policy may not be possible without city wide Article 4 Direction if government policy goes through as was consulted upon in April 2011 (the potential relaxation of the planning rules for change of use from business to residential).

### Option 3

#### No general protection of secondary office accommodation.

### Advantages

- Provides landowners/developers with the flexibility for future changes of use from employment land.
- Secondary office space easily adapted to residential use and this would provide an additional source of housing supply.

### Disadvantages:

- With the predominance of businesses in the city employing less than 10 people there is a continued demand for smaller floorplate office space and this will continue.
- Would affect the city's ability to meet its employment target of 6,000 new jobs by 2014 as the business base will stagnate due to the lack of available space.
- With potential less commercial space to meet demand available rental levels would increase, reducing the availability of affordable business space which could unduly affect city's growth sectors such as the digital sector.
- Does not address the need for more commercial space in suitable locations to allow the city to grow as an economic base for the wider economic area
- This further flexibility could lead to an uncoordinated and sizeable loss of valuable and accessibly located employment land.

## 6.0 Issue 4 More specific mention of strategic employment sites and their roles within Development Areas.

6.1 Through the City Plan the council's preferred approach will be still to identify development areas where particular opportunities for growth, regeneration, inward investment will be directed. These development areas will specify the amount and type of development that is anticipated to come forward during the plan period and how the council will support and encourage this development to come forward. Whilst strategic allocations and some mention of key sites were set out in the development proposals, previous planning rules (PPS12 Local Spatial Planning) advised against site allocations in the previous version of the document. However there is now more flexibility for the council to decide what type of policies can be contained in the City Plan including appropriate site allocations. The council considers that more specific mention of strategic employment sites (those sites previously safeguarded through Local Plan policies) and their proposed role could be made within the Development Area proposals and this option paper would allow the merits of the individual sites to be considered.

6.2 It is essential that any sites identified within the Development Area can come forward for redevelopment within the timeframe of the City Plan and are appropriate sites. As a consequence sites have been assessed against the following criteria:



- Availability - whether the site is available now, or likely to be available for development within the timeframe of the City Plan Part 1.
- Suitability - if the site is in an appropriate and sustainable location (such as whether it offers easy access to public transport, is the site in an area of flood risk, and would development adversely affect the character of the area or an area of ecological importance)
- Viability - if redevelopment is likely to be viable.

See appendix 2.

#### Option 1

No specific allocation of strategic employment sites within Development Area proposals and leave site allocations to City Plan Part 2.

##### Advantages:

- Accords with PPS12 guidance around the role and content of Core Strategies.
- All site allocations to be considered in the City Plan part 2.

##### Disadvantages:

- Would not provide certainty to developers and the business community on the council's proposed approach to currently allocated employment sites.
- Would not help clarify how some of the priorities and aspirations for development areas will be delivered.
- Would not reflect the priorities for economic development and growth in the City Plan Part 1.

#### Option 2

The specific allocation of strategic employment sites and their roles within Development Areas. See Appendix 2 for potential sites and opportunities.

##### Advantages

- This would provide certainty to developers and the business community on the council's approach to employment sites.
- Will provide more clarify on how some of the priorities and aspirations for development areas will be delivered.
- Reflects the priorities for economic development and growth in the City Plan.

##### Disadvantages

- Potential for confusion between broad development area aspirations, strategic allocation and employment site allocations unless carefully explained.

## 7.0 Issue 5 Appropriate hierarchy and protection of strategic industrial estates and premises

7.1 The city's Industrial /Warehousing (B1b, B1c, B2 and B8) stock of circa 300,000 sq m is primarily located on the 21 industrial estates / business parks around the city. They are all relatively small in size and located close to residential areas. Many others are clustered around the Old Shoreham Road, which was traditionally the main east-west route into the city. The vast majority were constructed in the late 1950s early 1960s when car ownership was low and people travelled to work locally wherever possible. These are now becoming dated and are also not best located for modern business requirements; however they still provide valuable employment for the residents of the city. Together with these industrial estates / business parks there are smaller units dispersed throughout the city.

The council has always encouraged developers to bring redundant commercial space back into operational use and with the aid of SRB/AIF programmes in the late 1990s early 2000s there was considerable success in the city in revitalising industrial estates and buildings on them to bring them up to modern day business requirements. Through the Local Plan policy, office floorspace (B1a) has also been allowed on these sites.

**7.2** The Employment Land Study (ELS) 2006 and 2009 update assessed these industrial estates/ business parks for their suitability for continued protection for employment use and their ability to accommodate further floorspace. The study found that these established areas remain popular and there were few that could be said to be entirely unsuitable for their current purposes, as demonstrated by local vacancy levels. Comparing the existing stock of employment sites and premises against the current demand, the study suggests there is no significant excess of industrial and warehouse sites/ premises that needed to be released to other uses.

**7.3** It is therefore important to continue to protect these employment sites whilst encouraging new business investment and opportunities in order to facilitate renewal and growth. Safeguarding employment land maintains the capacity for a diverse economic base in the city and provides jobs locally, reducing the need to travel.

**7.4** The withdrawn Core Strategy sought to introduce more flexibility into the allocation and use of these employment sites. The council recognises that it is necessary to:

- positively encourage refurbishment and upgrade where it modernises the employment floorspace and makes more efficient and effective use of the site/ premises.
- to improve the quality of the employment offer in terms of the types of employment and density of jobs
- to identify a limited number of employment sites for mixed use development where the twin benefits of high quality modern business floorspace and additional housing units can be achieved.

The previous version of the Plan also set out the requirements to be met for enabling development on employment sites.

**7.5** The council now considers that an opportunity exists to further clarify this hierarchy of approach to industrial estates/ premises through the allocation or safeguarding of primary employment sites within the City Plan Part 1.

The suitability of sites for mixed use have been assessed on the following criteria:

- The site is vacant or in need of investment and a new scheme would secure good quality modern, flexible employment floorspace;
- The type of employment uses on the site are compatible with residential use; and
- The locality is suitable for residential use.

**7.6** The assessment was informed by the ELS2006 qualitative and quantitative assessment and its 2009 update. Through the 2010 SHLAA update further consideration has been given to the role that employment sites can play in meeting housing need and this has informed the identification of opportunities for mixed use development.

### Option 1

Clarify a hierarchy through:

a) Identify and protect primary industrial estates and business parks where business, manufacturing and warehouse (B1, B2 and B8) development will be promoted and loss will be resisted. On the basis of the findings of the ELS 2006 and 2009 update, this would include:

- Centenary Industrial Estate
- English Close Industrial Area
- Home Farm Industrial Area
- Hove Technology Park
- Moulsecoomb & Fairways
- Sussex House (including BT depot)
- Woodingdean Business Park
- Hyde Business Park
- Bell Tower Industrial Estate
- Hollingbury Industrial Estate
- Hollingdean Industrial Estate
- Victoria Road Industrial Estate

b) Alongside the strategic employment allocations within Development Area proposals (see Issue 3), identify and allocate other sites where employment-led (residential and employment) mixed use development will be permitted in order to secure good quality modern, flexible employment floorspace. The starting point would be that the existing quantity of employment floorspace should be replaced. On basis of findings of ELS2006 Study and 2009 update:

- Franklin Road Industrial Estate
- School Road, Hove
- Melbourne Street Industrial Area
- Portland Road Trading Estate (including EDF and Martello House)

See Appendix 3 for site assessments.

### Advantages:

- More clarity of the intent of the policy through the identification of sites proposed to be protected are clearly set out in the policy and informed by site assessments
- More clarity on the intent of the policy through the identification of sites where employment-led mixed use developments will be allowed, informed by site assessments
- This would provide certainty to developers and the business community on the council's approach to allocation of employment sites and where flexibility has been introduced.
- Accords with the council's aspirations for the city to be an attractive business location.
- Responds to the need to safeguard commercial space in suitable locations to allow the city to grow as an economic base for the wider economic area.
- Clarifies the role some employment sites will play in delivering the council's preferred approach to delivering a local housing target.

**Disadvantages:**

- Potential for confusion between broad development area aspirations, strategic allocation and primary employment site allocations unless carefully explained.
- Viability of securing replacement of a similar quantity of employment floorspace on some sites.

**Option 2**

**Not to alter the overall proposed approach set out in the previous version of the plan to protecting industrial sites and premises but leave the actual employment site allocations until the City Plan Part 2.**

**Advantages:**

- Accords with PPS12 guidance around the role and content of Core Strategies.
- Would allow more detailed consideration of the approach to allocating sites and the merits of all individual site allocations (not just employment sites) to be considered through the preparation of Part 2 of the document.

**Disadvantages:**

- Concern that as this option does not identify the actual sites the policy does not provide sufficient clarity and certainty as to the approach to employment land to guide development management.
- Provides a more rapid response to development pressures and changes in situation.
- Would not provide clarity on sites where mixed use development would be allowed.

**Option 3**

**Consider whether further flexibility regarding employment generating permitted uses should be allowed on those estates/ premises outlined in Option 1a).**

**Advantages:**

- Greater flexibility to allow for other employment generating uses (to be defined) other than B1, B2 and B8 could encourage new business investments and opportunities on these sites.
- Approach could recognise a wider definition of appropriate employment uses then covered by traditional land use classifications
- Would be more flexible to respond to changes in the economy/ the emergence of new business sectors.

**Disadvantages:**

- There is a continued need to safeguard the existing businesses and jobs that are found in the city and provide space for them to grow and remain in the city.
- Unless appropriately defined could allow unsuitable uses on employment sites which could compromise the operation of existing employment uses.

## 8.0 Issue 6 Maintaining an adequate supply of appropriate, affordable business, manufacturing and warehouse accommodation

8.1 Together with the industrial estates / business parks identified in issue 5, there are smaller industrial units/ workshops dispersed throughout the city which provide affordable accommodation for local businesses. There is often pressure to redevelop these sites/ premises for other uses, particularly residential. This has especially been the case with many older poorer quality industrial buildings in predominantly residential areas. There has also been pressure on these sites for warehousing and trade counter uses to support the local economy's service sector.

8.2 The council considers that a good supply of appropriate employment land should continue to be safeguarded to allow for a broad range of business types to serve the city's needs. However the Housing Delivery Options Paper does include some secondary business, manufacturing and warehouse sites as a potential source of additional supply of housing sites.

### Option 1

For all other 'secondary' business, manufacturing and warehouse (B1 b, B1 c, B2 and B8) sites/ premises accommodation will be protected unless redundancy proven.

#### Advantages:

- Provides landowners/developers with the flexibility for future changes of use from employment land.
- Smaller business/ industrial and warehousing units/ workshops likely to be redeveloped more easily to residential use and this would provide a supply of 'windfall' residential sites.

#### Disadvantages:

- Without protection these sites/ premises will be lost to the market making it harder for small businesses to find space, inflating the rental values of space that is left making it less affordable to businesses in the city to remain.
- Housing land often has a higher land value, and this has led to developers looking at employment land to provide new housing. The Council's Employment Land Study highlights the importance of protecting land currently in employment use.
- General policy may not be possible without city wide Article 4 Direction if government policy goes through as is consulted upon in April 2011 (the potential relaxation of the planning rules for change of use from business to residential).

### Option 2

General policy of protection of secondary business, manufacturing and warehouse (B1 b, B1 c, B2 and B8) sites and premises unless redundancy proven but require reuse for alternative employment generating uses or affordable housing (the proportion to be determined following an update of the Affordable Housing Viability Study).

#### Advantages

- the city still needs to deliver a greater quantity of higher value of activity for both its resident population and for the wider South East economy, these opportunities will in the main come from the existing portfolio of employment sites.

- Housing need is a pressing issue in the city and seeking a viable proportion of affordable housing on redundant employment sites will meet the council's priorities to bring forward affordable housing.

### Disadvantages

- Too prescriptive and does not provide sufficient flexibility for future changes of use from employment land.
- General policy may not be possible without city wide Article 4 Direction if government policy goes through as is consulted upon in April 2011 (the potential relaxation of the planning rules for change of use from business to residential).

### Option 3

**No general protection of secondary business, manufacturing and warehouse (B1 b, B1 c, B2 and B8) sites and premises.**

### Advantages

- Provides landowners/developers with the flexibility for future changes of use from employment land.
- Secondary industrial sites/ premises/ workshops easily adapted to residential use and this would provide an additional source of housing supply.
- Would accord with the Government's potential changes to planning rules to allow change of use from business to residential without the need for planning permission.

### Disadvantages:

- With the predominance of businesses in the city employing less than 10 people there is a continued demand for smaller floorplate employment floorspace and this will continue.
- Would affect the city's ability to meet its employment target of 6,000 new jobs by 2014 as the business base will stagnate due to the lack of available space.
- With potential less commercial space to meet demand available rental levels would increase, reducing the availability of affordable business space.
- Does not address the need for more commercial space in suitable locations to allow the city to grow as an economic base for the wider economic area
- This further flexibility could lead to an uncoordinated and sizeable loss of valuable and accessibly located employment land.

## 9.0 Sustainability Appraisal of Options

9.1 A full Sustainability Appraisal (SA) has been undertaken of the employment policy options presented above and is available on the council's website. A summary of the findings and recommendations by issues is provided below:

- Issue 1 - Recognition and support of the city's primary office area; the Sustainability Appraisal found that Option 1 to identify and protect central Brighton as the primary office area had the potential for positive impacts and more certainty than Option 2 and was recommended as the preferred option. The recommendation to secure improved environmental performance of refurbished and upgraded office accommodation could be addressed by links to a city wide sustainable building policy.

- Issue 2 - Accommodating the need for 20,000 sq m additional office floorspace; Option 1 was considered as having more certainty than the other options put forward as the specific sites are named and the relative constraints of sites can be assessed and addressed. There was more potential for positive impacts, the option seemed to be more viable in the current economic climate and may meet local needs by offering a range of premises over a range of sites.
- Issue 3 - Maintaining an adequate supply of appropriate, affordable office accommodation; Option 2 was found to have the potential for stronger positive impacts than the other option in relation to housing, employment, education, health and access objectives. The SA recommended clarity around tests for redundancy which could be addressed through policy wording.
- Issue 4 - More specific mention of strategic employment sites and their roles within Development Areas; Option 2 identifying strategic employment sites within Development Area proposals was found to have the potential for an overall positive impact on a number of SA objectives. The overarching Development Area proposals can address the issues raised in the SA relating to air quality, local priorities including air quality, public realm and townscape improvements and where appropriate coastal flooding risk.
- Issue 5 - An appropriate hierarchy and protection of industrial estates and premises that encourages their refurbishment and upgrade and whether further flexibility should be considered. The SA found there to be more certainty of impacts with Option 1 than Option 2 as sites were named and was found to have more significant positive impacts on employment and education objectives. Option 3 to allow more flexibility of employment uses on safeguarded sites was considered to have positive impacts on SA objectives relating to employment and economic development.
- Issue 6 - Maintaining an adequate supply of appropriate, affordable business, manufacturing and warehouse accommodation; Option 2 was found to have the potential for stronger positive impacts than the other option in relation to housing, employment, education, health and accessibility objectives. The SA recommended clarity around tests for redundancy which could be addressed through policy wording.

The SA recommended mitigation measures for all options which can inform the policy wording.

## 10.0 Preferred options and summary justification

The Council's preferred approach is to:

- Specifically identify and safeguard Central Brighton as the city's primary office area to accord with the council's aspirations for central Brighton to be a vibrant employment location and respond to the need to safeguard commercial space in suitable locations to allow the city to grow as an economic base for the wider economic area (Issue 1, Option 1).
- Identify and allocate a ranges of sites to accommodate the forecast need for an additional 20,000 sq m of office floorspace within the New England Quarter and London Road Development Area as a more flexible and viable way of bringing forward new office floorspace (Issue 2 Option 1)

- Allocate strategic employment sites within the City Plan and identify their proposed role within the Development Areas to clarify and provide certainty to landowners and developers on the council's preferred approach to securing regeneration, inward investment and high quality modern employment floorspace and, where appropriate employment-led mixed use development (Issue 4 Option 2) .
- Identify a hierarchy of industrial estates/ premises by allocating in the City Plan those sites which will continue to be safeguarded for business, manufacturing and warehouse use and where refurbishment and improvement will be encouraged and also allocating those assessed as suitable for employment-led mixed use development where the twin benefits of high quality of modern business floorspace and additional housing requirements can be achieved (Issue 5 option 1 and 3).
- Safeguard secondary employment sites to ensure a good supply of appropriate employment land available for a broad range of business types to serve the city's needs (Issue 3 option 2 and Issue 6 option 2).



## Appendix 1 - Accommodating the need for the 20,000 sq m additional office floorspace - Site Assessments

### Redevelopment Opportunities

<b>Site</b>	<b>Vantage Point, Elder Place (including Circus Parade)</b>
Site Area and Description	0.37 Ha 1960s office block with c. 7 stories and basement with retail units at ground floor; Circus Parade retail units and residential above, small public square and small car park to rear. Ownership: Spen Hill Developments
Current Planning policy	Not allocated in Local Plan.
Current Status	Pre-application discussions
Site Assessment	Available - vacant office block, developer in pre-application discussions. Suitable - Good location - fringe of city centre, good public transport Viable - may require mix of uses to enable redevelopment to provide office floorspace
Opportunities	Development opportunities identified through London Road Central SPD: either site on own or wide comprehensive regeneration with adjacent site. 2010 SHLAA indicates potential for housing - 90 units.
<b>Site</b>	<b>Trade Warehousing (Longley Industrial Estate), 4-6 New England Street</b>
Site Area and Description	0.22 Ha. Terrace of low rise light industrial/ trade warehousing in mixed use. Ownership: Spen Hill Developments have long lease on site. BHCC own freehold.
Current Planning policy	Allocated in Local Plan
Current Status	Pre-application discussions
Site Assessment	Available - Relatively modern units each of which around 500 sq m no vacancies; Suitable - Good location - fringe of city centre, good public transport Viable - may require mix of uses to enable redevelopment to provide office floorspace
Opportunities	Development opportunities identified through London Road Central SPD: Part of wider comprehensive redevelopment with Vantage Point above or redevelopment with business units 2010 SHLAA Category 5 site.

<b>Site</b>	<b>Richardson's Scrapyard and Brewers Paint Merchants site, New England Street</b>
Site Area and Description	0.26 Ha Builders merchant and scrap yard Ownership: part owned by BHCC
Current Planning policy	Not allocated in Local Plan
Current Status	
Site Assessment	Available - multiple uses Suitable - Good location - fringe of city centre, good public transport Viable - may require mix of uses to enable redevelopment to provide office floorspace
Opportunities	London Road Central SPD; Employment uses including business floorspace and affordable workspace for creative industries. Residential may be allowed as enabling development. 2010 SHLAA update indicates potential for housing - 65 units and more intensive use of site

**Outstanding Planning Commitments, other opportunities**

<b>Site</b>	<b>Block J, Brighton Station</b>
Site Area and Description	0.86 Ha. Outstanding development opportunity within New England Quarter Ownership: Square Bay Properties
Current Planning policy	Allocated in Local Plan
Current Status	BH2010/03999 - application for mixed use scheme, 3-4 star hotel, 148 residential units and 2973sqm commercial office space (Class B1), m of office under consideration.
Site Assessment	Available - cleared site Suitable - Good location - city centre, excellent public transport links Viable - viability of office use may require mix of suitable uses and pre-let
Opportunities	Council aspiration for further office development and a mix of suitable uses including residential. Brighton Station Masterplan. 2010 SHLAA indicates potential for 100 units

<b>Site</b>	<b>Block K Brighton Station</b>
Site Area and Description	1.127 Ha Outstanding development opportunity within New England Quarter  Ownership: McAleer & Rushie Group Ltd, development for NEQ-QED Ltd
Current Planning policy	Allocated in Local Plan
Current Status	BH2008/01148 five storey office development c. 3,428 sq m, public open space and landscaping scheme was approved April 2009 and s.106 Agreement signed and decision notice issued July 2010.
Site Assessment	Available - cleared site  Suitable - Good location - city centre, excellent public transport links  Viable - pre-let secured
Opportunities	Appropriate for office development. Agents in advanced negotiations with a local occupier to secure a pre-let for entire building

<b>Site</b>	<b>Blackman Street site (land adjacent to Britannia House)</b>
Site Area and Description	0.11 Ha.  Cleared site, (was temporary used as sales office for developers of City Point).  Ownership: private (CSMA)
Current Planning policy	Allocated in Local Plan
Current Status	BH2007/02443 retrospective planning permission used for temporary sales office
Site Assessment	Available - Privately owned and ready for development. Being Marketed  Suitable - Good location - city centre, excellent public transport links  Viable - considered appropriate location for office development.
Opportunities	2010 SHLAA 'call for site' submission indicated being marketed for office and the consideration should be given to mixed use which would not prejudice office development. 2010 SHLAA update - 11 units

## Brighton & Hove City Plan Employment Policy Options Paper (October 2011)

<b>Site</b>	<b>Cheapside (south between Blackman Street and Whitecross Street)</b>
Site Area and Description	0.16 Ha. AutoCentre and warehouse units with office and parking. Ownership: BHCC freehold
Current Planning policy	New allocation.
Current Status	
Site Assessment	Available - multiple uses Suitable - Good location - city centre, excellent public transport links Viable - considered appropriate location for office development
Opportunities	Potential for mixed housing and office development. Potential for housing assessed in 2010 SHLAA update - 32 dwelling yield (Category 2 site).

<b>Site</b>	<b>GB Liners Site, Blackman Street</b>
Site Area and Description	0.08ha 1970s metal clad depot warehouse building Ownership: BHCC freehold leased to GB Liners
Current Planning policy	New allocation
Current Status	BH2009/00087: Planning permission was granted in April 2009 for the demolition of the existing B8 depot building on the site and redevelopment to provide a building of 3,327m <sup>2</sup> (gross) of flexibly designed B1 floorspace set over five floors.
Site Assessment	Available - requires relocation of current business Suitable - Good location - city centre, excellent public transport links Viable - subject to relocation of current business
Opportunities	Redevelopment of the site to provide uses more appropriate to the city centre employment location to assist with the relocation of GB Liners to a more suitable site to accommodate business retention and expansion.

Site	City College, Pelham Street
Site Area and Description	1.33 Ha Education use - current City College Pelham Street Campus Ownership: City College
Current Planning policy	New allocation
Current Status	BH2008/02376: City College, Pelham Street Campus. Outline planning permission was granted in April 2009 for the redevelopment of the site for a mixed use scheme based around a replacement further education campus.
Site Assessment	Available - current City College Pelham Street Campus would require phased redevelopment Suitable - Good location - city centre, excellent public transport links Viable - funding over commitments nationally by the Learning & Skills Council, further consideration of funding the development required
Opportunities	Further Education "Knowledge Quarter" (as in Pelham Street Knowledge Quarter Planning Brief). However, following funding over commitments nationally by the Learning & Skills Council, further consideration of funding of the development is required.

**Appendix 2 More specific mention of strategic employment sites and their roles within Development Areas. Site Assessments**

<b>DA2 Brighton Marina</b>
<b>Vision</b> - facilitate the creation of the Brighton Marina and the wider area as a sustainable mixed use district of the city through the generation of a high quality marina environment
Previously Proposed Strategic Allocations
<b>Brighton Marina Inner Harbour</b>
<u>Change Required</u> - revisit amount of development, status of retail shopping centre.
Proposed Additional Employment Site Allocations
<b>Gasholder Site</b>
<b>Area and description:</b> 2 Ha site located on the western side of Marina Way. Consists of cleared southern half, small industrial units (approx. 2,412 sq m) some currently vacant as well as a motor repair shop and gas holders <b>Current use:</b> northern part of the site is currently occupied by the gas holders. Ownership National Grid, northern tip of site by BHCC; southern half of site vacant <b>Planning Status:</b> currently a split allocation in Local Plan (EM1) (southern part of site identified for housing HO1)
<b>Site Assessment:</b> The ELS 2006 identified potential location for the development of light industrial units for small and start-up businesses on the basis of freehold or long leasehold sales. Owner has indicated that removing the infrastructure (gas holders) and remediating the contaminated ground (plus provision of appropriate replacement facilities elsewhere) on northern part of the site is likely to be millions of pounds.
<b>Opportunities:</b>
<ul style="list-style-type: none"> <li>● Represents a significant development opportunity, in close proximity to Brighton Marina and Black Rock (Brighton Marina PAN 04)</li> <li>● It is appreciated that due to the decommissioning and remediation costs, a comprehensive approach to the redevelopment of both parts of the site may be required</li> <li>● Opportunity for c. 4,000 sq m industrial (B1-B2) industrial floorspace</li> <li>● Allocation should reflect concerns around deliverability given contamination costs and consider an appropriate mix of uses including residential</li> <li>● 2010 SHLAA indicates category 3 site 84 units southern part of site.</li> </ul>

<b>DA3 Lewes Road</b>
<b>Vision</b> - Further develop and enhance the role of Lewes Road as the city's academic corridor (a neighbourhood of knowledge and enterprise focused around the Universities).
<b>Previously Proposed Strategic Allocations</b>
<b>Preston Barracks</b>
<u>Change Required</u> - update policy wording and amounts of development to reflect 2011 Planning Brief and inclusion of university campus sites (Watts and Mithras House sites).
<b>Community Stadium</b>
<u>Change Required</u> - removal of site as strategic allocation and revise amounts of development as development now successfully implemented.
<b>Proposed Additional Employment Site Allocations</b>
<b>Woollards Field, Lewes Road</b>
<b>Area and description:</b> 2.88 Ha site located south-west of the Southern Water offices on the A270 at Falmer. Owned by ESCC. <b>Current use:</b> vacant former overflow sport pitches associated with schools in Brighton, declared surplus to use in 1990s has not been used for sporting or recreational purposes since that time. It is privately owned and is not accessible to members of the public. <b>Planning Status:</b> Allocated in the Local Plan (EM2) BH2010/03259 permission approved January 2011 for the construction of a 1-3 storey archive centre comprising lecture and educational facilities, reading room, conservation laboratories, archivist study areas, offices, cleaning and repair facilities for archives, repository block and refreshment area. Associated energy centre, car, coach and cycle parking, waste and recycling storage, landscaping including public open space and access on part of site (1.98 ha).
<b>Site Assessment:</b> the BH2010/03539 application demonstrates that a substantial part of Woollards Field south (0.9 ha site) could be potentially developed in the future for B1 employment use.
<b>Opportunity:</b>
<ul style="list-style-type: none"> <li>● Reflect the outstanding commitment of a new historical resource centre - The Keep (BH2010/03259)</li> <li>● Importance of bringing forward the outstanding opportunity on the remaining part of site for c. 5,000 sq m of office floorspace.</li> </ul>

**DA4 New England Quarter and London Road**

**Vision** - Proposed location for a new business quarter for the city recognising its fringe location to city centre with excellent transportation link, the successful redevelopment of Brighton Station, the existing creative industries hub, and significant redevelopment opportunities to secure additional new office floorspace to meet identified needs.

**Previously Proposed Strategic Allocations**

**125- 163 Preston Road**

**Change Required -.**

Update amounts of development to reflect the increased role certain sites will play in delivering housing numbers to reflect 2010 SHLAA and emerging Viability Study.

**Proposed Additional Strategic Allocation**

**Identification of sites to accommodate 20,000 sq m of additional office floorspace through redevelopment opportunities and reflecting outstanding commitments for office floorspace**

See Appendix 1 for further details

**Proposed New Employment Site Allocations**

**New England House**

**Site Area and description:** 0.34 Ha. Early 1960s industrial building with over 12,000 sq m of lettable space over eight floors. Owned by BHCC.

**Current use:** multitude of small local businesses

**Planning Status:** allocated in Local Plan (EM1)

**Site Assessment:** Although some of the floorspace is currently un-let due to its condition and size, the building has recently seen a significant proportion of its space occupied by businesses within the digital media and creative industries sector. This is due to the competitive rates, flexible terms and the location close to North Laine and the train station. The Council's Cabinet in October 2010 agreed to pursue an option for the refurbishment of the building with shared network, Research & Design and innovation space, with the building continuing to provide affordable and flexible managed space.

**Opportunities:**

- Deliver its upgrade and refurbishment;
- Reflect importance of premise as a creative industry and digital media hub;
- To ensure workspace remains affordable, appropriate and available for use.



**DA5 Edward Street and Eastern Road Area**

**Vision** - Recognises the concentration of major employers in the area both private sector (Amex) and public sector including RSCH and the need to improve the public realm, townscape and sustainable transport corridor.

**Previously Proposed Strategic Allocations**

**Royal Sussex County Hospital**

Change Required - update amounts of development and need for transport feasibility study

**Edward Street Quarter**

Change Required - update amounts of additional office development to reflect SHLAA updates and emerging viability study.

**Proposed New Employment Site Allocations**

**Circus Street site**

**Site Area and description:** 0.75 ha dilapidated former municipal market building, located close to the heart of the city centre within an existing mixed use area.

Current use: vacant (building is used for limited short-term uses)

Planning Status: currently allocated in Local Plan

**Site Assessment:** The city council and the University of Brighton have been working in partnership towards the regeneration of the former Circus Street Municipal Market site. The city council is looking to achieve its economic development objectives of providing more employment floorspace, and housing objectives of increasing the supply of affordable units, as well as ensuring that the site is developed to the very highest standards of urban design and sustainability. Circus Street Supplementary Planning Document (SPD) March 2006.

**Opportunities:**

- Potential of site to deliver education uses, creative industries and student housing
- Ensuring that the site is developed to the very highest standards of urban design and sustainability
- Financially viable and deliverable redevelopment which secures regeneration benefits to the local community.

**Freshfield Road Business Park**

**Site Area and description:** 3.13 Ha two storey buildings dates from the early 1980s, although a number of units have been extensively re-furnished recently. Estates provide a mix of trade counter and industrial premises, although the proportion of trade counter now dominates. Freehold BHCC long lease to Hargreaves.

**Current use:** Jewson, Royal Mail and local businesses

**Planning Status:** allocated in Local Plan

**Site Assessment:** long leaseholder (Hargreaves Property Investments Ltd) entered into a rolling programme of refurbishment and re-development, estate is economically viable although most of the upgrading has been to provide trade counter unit.

**Opportunities:**

- Potential to consider the long-term comprehensive redevelopment of the site in a relatively central and accessible location which is regarded as inefficient in its current employment density and quality
- May need to consider whether there is potential for part of this site to be released for housing. 2010 SHLAA indicated Category 4 site potential 117 units.

**DA6 Hove Station Area**

**Vision** - recognises the longer-term regeneration opportunities for Hove Station area to create a sustainable, high quality employment-led mixed use area. The priority is to continue to protect and enhance the existing employment floorspace provision in the area in order to help maintain and strengthen the local economy. Opportunities for the area to deliver significant growth in relation to employment, although these are likely to be in the latter part of the plan period (post 2016).

**Previously Proposed Strategic Allocations**

n/a

Change Required -update amount of development to reflect 2010 SHLAA

**Proposed Employment Site Allocations**

**Conway Street Industrial Area**

**Area and Description:** 3.44 Ha with the exception of the refurbished Agora office building, poor quality buildings and bus depot. Mixed ownership.

**Current use:** Custom Pharmaceuticals, Bus Company. Various in Agora including training uses.

**Planning Status:** currently allocated in Local Plan

**Site Assessment: ELS 2006:** Buildings offer economical accommodation for local companies however a number of buildings are nearing the end of their functional lives, and the site as a whole offers scope for employment space redevelopment.

**Opportunities:**

- Comprehensive, employment led redevelopment, may require some relocation of uses
- Residential. 2010 SHLAA suggested category 3 site 125 units.
- Higher density higher value job opportunities
- Townscape and public realm improvements

**Newtown Road Industrial Area**

**Area and Description:** 2.6 Ha 14 mainly industrial buildings, majority relatively modern and fit for purpose.

**Current use:** variety of local businesses and variety of owners

**Planning status:** currently allocated in Local Plan (EM1)

BH2010/03937- Temporary part change of use for a period of 10 years from General Industrial (B2) to Climbing Wall Centre (D2) approved March 2011.

**Site Assessment**

ELS2006 and update 2009 - Southern side of Newtown Road relatively modern estate well suited to local business. No potential in short-medium term. Redevelopment opportunity on site at junction with Goldstone Lane (56 Newtown Road). However 2008 DV Report indicated previous permission for 3,300 sq m office redevelopment (BH2004/02582/FP) not viable. A reduced office scheme relying on enabling residential development (24 units) was considered viable.

**Opportunities**

- Comprehensive, employment led redevelopment
- Higher density, higher value job opportunities
- Townscape and public realm improvements

## Proposed New Site Allocations

### Goldstone Road Retail Park

**Area and description:** 2.17 ha former Goldstone Ground, out of town retail units with large area of car parking fronting the site. Private ownership.

**Current use:** Retail warehouses (JJB Sports, Toys R Us, Comet, DFS)

**Planning Status:**

**Site Assessment:** under-utilised site, single storey retail sheds, excessive parking. Poor public realm and lack of street frontage.

Opportunities:

- Comprehensive redevelopment of site with residential above retail and some employment use
- Attractive location opposite Hove Park close to City Park.
- Like for like retention only of retail floorspace

### Sackville Trading Estate

**Area and description:** 1.8 Ha 1980s purpose built industrial estate east side of Sackville Road which contains a number of small scale buildings, which comprise a mix of employment, trade counter and restricted retail uses.

**Ownership:** Parkridge Developments

**Current use:** mixed including Halfords and Rayners

**Planning Status:** Planning permission granted March 2010 (BH2009/00761) for a comprehensive development providing a mix of uses including: A1, A2-A5 (8,131 sq m), residential apartments (92), offices (5,287sq m).

**Site Assessment:** The site currently contains a number of small scale buildings; 1980s purpose built industrial units, good occupancy and currently approximately c. 5,400 sq m of B use class space accommodated on the site with a mix of light industrial, trade counter and warehousing. Could make more efficient use of the site and improved public realm and public transport improvements.

Opportunities:

- Redevelopment opportunity could increase the development capacity of under-utilised site.
- Like for like retention only of retail floorspace
- Townscape and public realm improvements
- Residential uses as part of employment-led mixed use development

**DA7 Shoreham Harbour**

**Vision** - support the long term regeneration of Shoreham Harbour and immediately surrounding areas. The plans for the Harbour will deliver the regeneration objectives of addressing housing need, improving the quality, variety and availability of employment and training opportunities as well as raising the quality of the waterfront environment for the benefit of local communities and visitors. The plans will also help to implement the adopted Shoreham Port Masterplan, supporting a thriving, modern, consolidated Port.

**Previously Proposed Strategic Allocations**

n/a

Change Required: reflect the findings of Capacity and Viability Studies and Shoreham Port Masterplan.

**Proposed Employment Site Allocations**

**South Portslade Industrial Area**

**Area and Description**: 5.4 ha. A large area of relatively secondary offices, workshops, light industrial and non B uses north of Shoreham Harbour.

**Current use**: a wide range of occupiers with no one dominant employer and a wide range of freehold owners ranging from owner occupiers, small investors and property companies

**Planning Status**: various

**Site Assessment**: ELS 2006 and 2009 update: poorly located, remains suitable for small and local businesses requiring economical premises. Unless wholesale redevelopment was envisaged and difficult due to fragmented ownership, any scheme would be limited to small workshops and industrial units. Rental levels and yields unlikely to be particularly strong.

**Opportunities:**

- Within the identified North Quayside / South Portslade character area, there is an opportunity for employment-led redevelopment of existing lower grade employment areas
- Potential for additional new employment floorspace (focussing on sectors which will provide higher wages and improved career prospects for local people) and to improve the business environment and support the needs of existing employers.
- Townscape and public realm improvements

### Appendix 3 Appropriate hierarchy and protection of industrial estates and premises. Site Assessments

Site	Centenary Industrial Estate
Site Area and Description	1.14 Ha Relatively modern estate to north of city centre comprising a small industrial development with unit sizes ranging from 300 sq m to 1,000 sq m. Remaining opportunity former Securicor premises. Variety of local businesses in mixed ownership
Current Planning policy	Allocated site (EM1)
Current Status	
Site Assessment	The Council's Employment Land Study concludes that the site is suitable for continued employment use

Site	English Close Industrial Area, Old Shoreham Road
Site Area and Description	1.57 Ha Western part of estate recently redeveloped. Mix of trade counter operations and industrial units in remainder perfectly adequate for their uses. Mix of local businesses in mixed ownerships
Current Planning policy	Allocated site (EM1)
Current Status	
Site Assessment	The Council's Employment Land Study concludes that the site is suitable for continued employment use

Site	Home Farm Industrial Estate
Site Area and Description	2.5 ha Five substantial two-storey modern business units constructed 1990s. No development opportunities as a modern fully developed business estate. BHCC freehold. Occupiers: Covers Timber and Builders Merchants, EDOMVM and Forfars Bakery
Current Planning policy	Allocated site (EM1)
Current Status	
Site Assessment	The Council's Employment Land Study concludes that the site is suitable for continued employment use

## Brighton & Hove City Plan Employment Policy Options Paper (October 2011)

Site	Hove Technology Park, St Joseph Close, Old Shoreham Road
Site Area and Description	4.6 ha St Josephs Close scheme completed to provide a number of modern industrial and business units and Hove Technology Centre. Potential for redevelopment of the northern end and the west which should be economically feasible. Occupier demand should be good. Southern end of site owned by BHCC but subject to long lease over part. Key occupiers: British Red Cross, SL Group
Current Planning policy	Allocated site (EM1)
Current Status	
Site Assessment	The Council's Employment Land Study concludes that the site is suitable for continued employment use

Site	Moulsecoomb & Fairways Industrial Estate
Site Area and Description	3.5 ha Reasonably good location, Fairway Trading Estate is modern fully occupied estate that does not require redevelopment. Site split by church. Potential for redevelopment of the western side of Westergate House for small business users. Mixed ownership including BHCC. Key occupiers: Kingspan, Allen West Electrical
Current Planning policy	Allocated site (EM1)
Current Status	
Site Assessment	The Council's Employment Land Study concludes that the site is suitable for continued employment use.

Site	Sussex House Industrial Area (including BT depot)
Site Area and Description	1.86 ha Estate comprises a mix of modern and 20 year old buildings, suitable for employment uses. Fragmented ownership. Key occupiers include BT
Current Planning policy	Allocated site (EM1)
Current Status	
Site Assessment	The Council's Employment Land Study concludes that the site is suitable for continued employment use

Site	Woodingdean Business Park
Site Area and Description	3.9 Ha Programme of redevelopment since 2000. 3 phases now completed providing mix of employment uses. Planning consent for Phase 4 comprising 6 B1 light industrial units granted August 2008. Remainder of site being developed when end users identified. BHCC long leasehold interest St Modwen Developments. Key Occupiers: various local businesses
Current Planning policy	Allocated site (EM1)
Current Status	BH2010/01454 - development of 3,479 sq m industrial and storage buildings with associated offices and a wind turbine together with provision for access, servicing, parking and landscaping approved August 2010.
Site Assessment	The Council's Employment Land Study concludes that the site is suitable for continued employment use

Site	The Hyde Business Park
Site Area and Description	1960s industrial estate on the fringe of the eastern side of Bevendean residential area, poor road access; appearance improved through SRB; largely let. Ownership: BHCC freehold, long ground leases.
Current Planning policy	Allocated Site (EM1)
Current Status	
Site Assessment	Although long term suitability (age and location) for employment uses raised in ELS 2006 and 2009 update council consider estate continues to offer local job opportunities as indicated by low vacancy levels.

Site	Bell Tower Industrial Estate
Site Area and Description	1.5 Ha 11 small industrial units offer good modern, small industrial and business units which are eminently suitable for local business. Ownership: various leaseholds.
Current Planning policy	Allocated Site (EM1)
Current Status	
Site Assessment	The Council's Employment Land Study concludes that the site is suitable for continued employment use

## Brighton & Hove City Plan Employment Policy Options Paper (October 2011)

Site	Hollingbury Industrial Estate
Site Area and Description	9.93 Ha One of city's premier industrial locations due to proximity to A27. Estate has been subject to on-going redevelopment and refurbishment (e.g. Crowhurst Corner, Exion 27) Ownership: BHCC freehold. Let on long ground-leases. Key occupiers: Sussex police, Newsquest Sussex Ltd
Current Planning policy	Allocated Site (EM1)
Current Status	
Site Assessment	The Council's Employment Land Study concludes that the site is suitable for continued employment use

Site	Hollingdean Industrial Estate
Site Area and Description	3.9 Ha Reasonable proximity to A270 but access is poor. Waste transfer station now completed, remaining redevelopment opportunity is former meat market units. Ageing accommodation housing City Depot. Ownership: BHCC, Key occupiers: City Clean depot, Veolia MRF/transfer station
Current Planning policy	Allocated Site (EM1)
Current Status	
Site Assessment	The Council's Employment Land Study concludes that the site is suitable for continued employment use

Site	Victoria Road Industrial Estate
Site Area and Description	3.31 Ha Good access, area bisected by Victoria Road; land to the north is dominated by Chandlers BMW; redevelopment opportunity to the south to improve access/ public realm. Ownership: Endeavour Group
Current Planning policy	Allocated site (EM1)
Current Status	
Site Assessment	The Council's Employment Land Study concludes that the site is suitable for continued employment use



Those sites assessed as suitable for employment-led mixed use development:

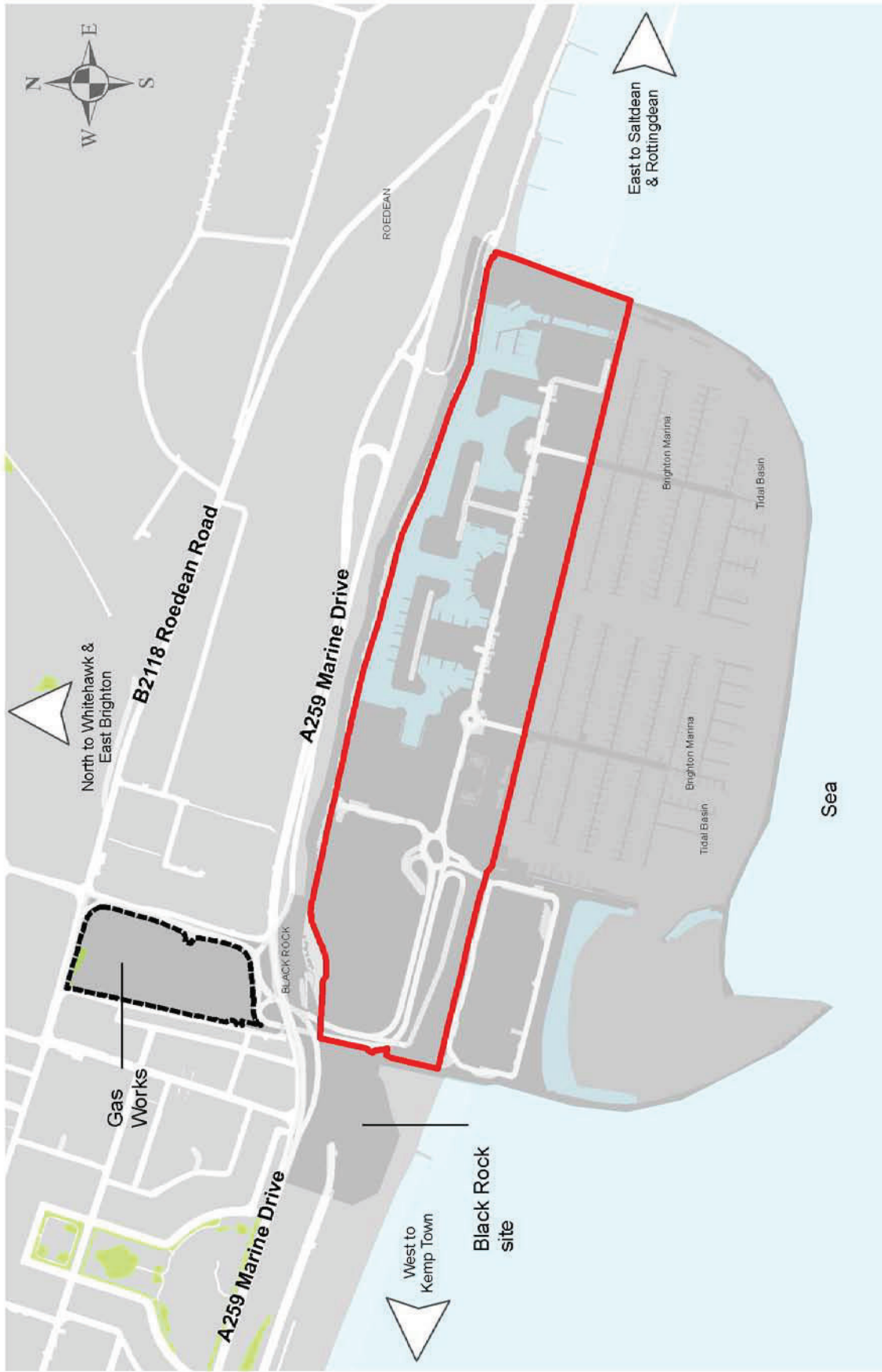
Site	Franklin Road Industrial Estate, Norway Street
Site Area and Description	0.56 Ha 4 ageing industrial units within a residential area; with constrained access. Majority of site (0.52 ha) freehold owned by Infinity Food Cooperative Ltd but operate a split site. Occupiers: BB Printing (Palmer & Harvey McLane Ltd) at 67a Norway Street.
Current Planning policy	Allocated site (EM1)
Current Status	BH2010/00637 Application to extend time limit for implementation of previous approval (BH2007/01655) for a replacement warehouse on southern part of site including mezzanine floor and covered loading bay approved May 2010
Site Assessment	Currently in use and potential for local business to refurbish units but their long term expansion on site is constrained. In the event of the current businesses relocating, the ELS2006 considered the units would not be re-lettable and considered the site not suitable for employment use and site more suited to residential use, poor access and surrounded by residential. SHLAA 2010 Category 5 site.

Site	School Road Industrial Area, Hove
Site Area and Description	1.22 Ha Estate comprises a mix of office and light industrial /workshop units and non B uses, the majority of which are more than 30 years old. Lack of parking for larger units but 1970s Rayford House refurbished to provide reasonably good office accommodation. Cross Stone Urban Regeneration (except Rayford House) Occupiers: Westows soft play area, Tyre Express, Neils Steels Ltd, Cliffords, Written Word, Rayford House Offices
Current Planning policy	Allocated in Local Plan (EM1)
Current Status	
Site Assessment	Given the high site coverage on most of the site, any redevelopment would be likely to mean a reduction on floor space to allow for modern parking and loading requirements. 2010 SHLAA Category 3 site 46 units.

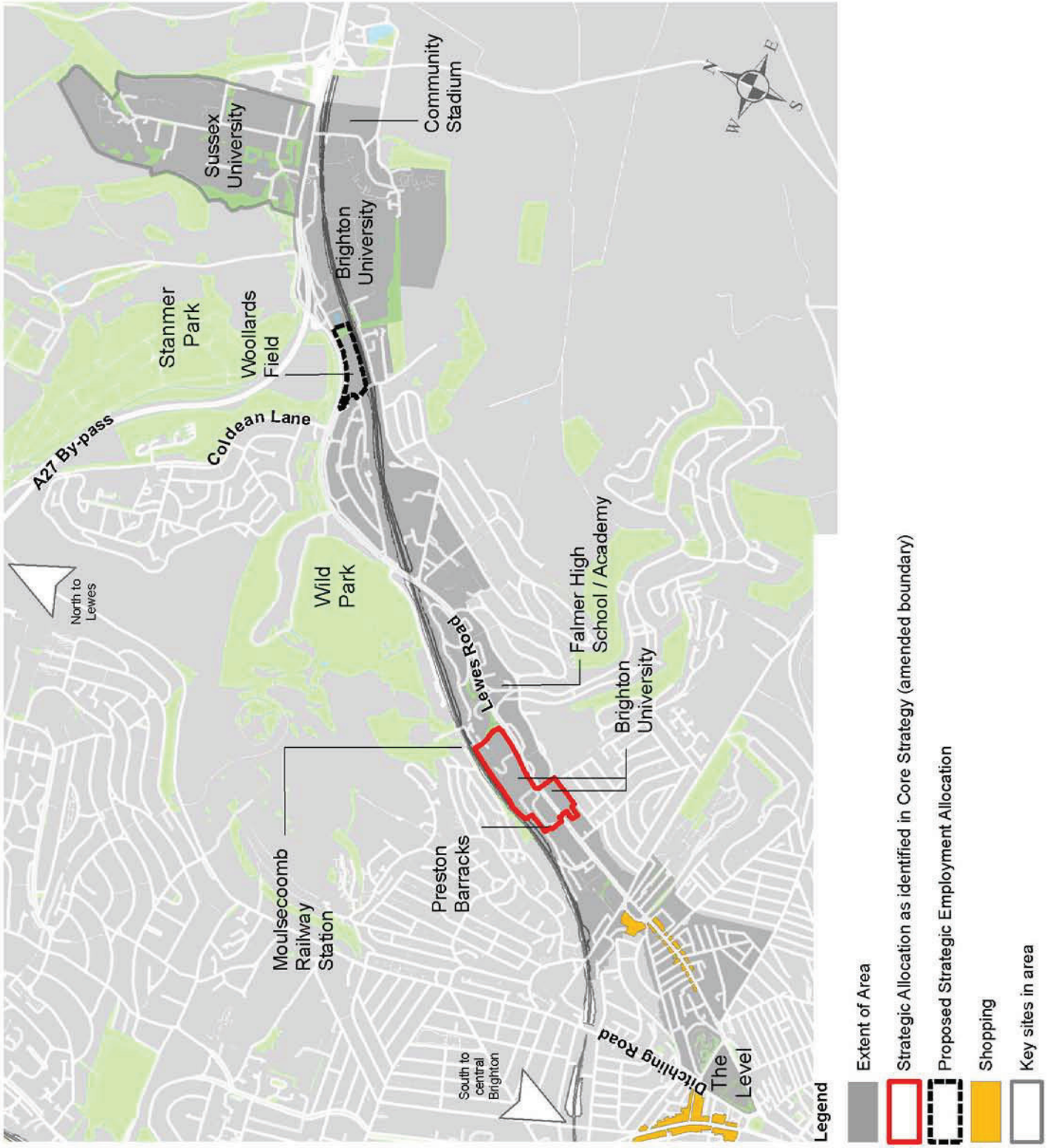
Site	Melbourne Street Industrial Area
Site Area and Description	0.56 Ha. Estate is dominated by Enterprise Point, a multi storey building but also includes strip of ageing workshops. Enterprise Point owned by Cross Stone Urban Regeneration. Occupiers:
Current Planning policy	Allocated in Local Plan (EM1)
Current Status	
Site Assessment	Melbourne Street off Lewes Road is within a largely residential area with poor access to site although local public transport links along Lewes Road are good. Enterprise Point is an ageing multi-storey building let to a multitude of users including non B use class users. Would not be economically viable to redevelop for existing uses; building may have potential for redevelopment but only if high density and possibly mixed use. Remainder of site - small aged workshops with limited parking. Future redevelopment of these workshops would not be feasible for modern workshop/ light industrial uses. Alternative uses (affordable housing) might be more appropriate. 2010 SHLAA Category 5 residential site

Site	EDF/ Portland Trading Estate
Site Area and Description	3.2 Ha Estate parallel to Old Shoreham Road, 15 units including a terrace of modern units, Martello House and a large three storey office occupied by EDF energy on western half of site.
Current Planning policy	Allocated in Local Plan (EM1)
Current Status	
Site Assessment	Redevelopment opportunity for more effective use of site on western half of site if no longer required for medium sized industrial and business units opportunity. SHLAA 2010 category 3 site potential 151 units.

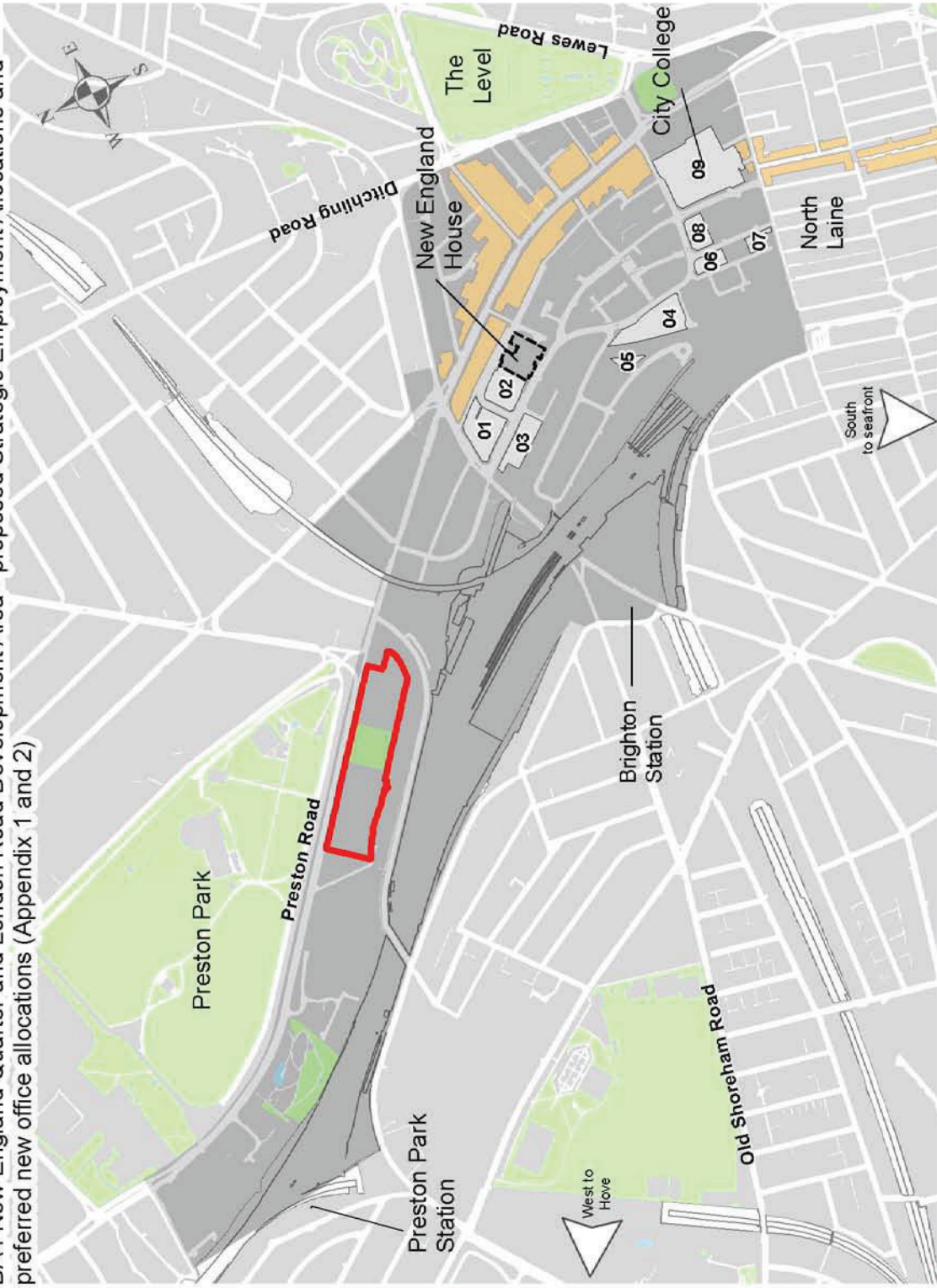
DA2 Brighton Marina Development Area - proposed Strategic Employment Allocation (Appendix 2)



DA3 Lewes Road Development Area - proposed Strategic Employment Allocation (Appendix 2)



DA4 New England Quarter and London Road Development Area - proposed Strategic Employment Allocations and preferred new office allocations (Appendix 1 and 2)



Site No.	Site Name
01	Vantage Point, Elder Place
02	Trade Warehousing, New England Street
03	Richardson Scrapyard & Brewers Paint Merchants, New England Street
04	Block J, Brighton Station
05	Block K, Brighton Station
06	Blackman Street site
07	GB Liners Site
08	Cheapside
09	City College

- Legend**
- Extent of Area DA4
  - Strategic Allocation as identified on Core Strategy
  - Proposed Strategic Employment Allocation
  - Preferred new office allocations & key sites
  - Shopping

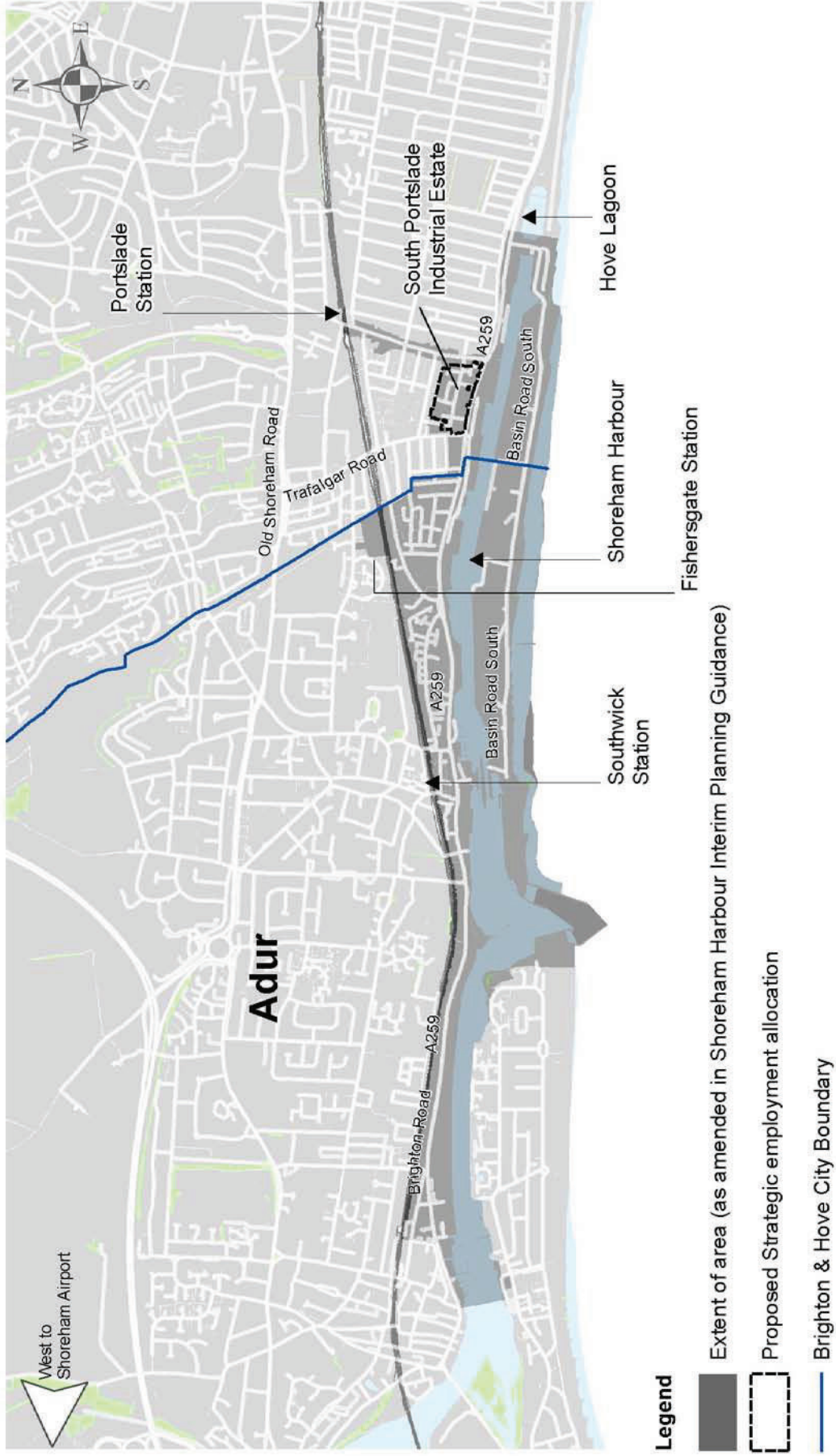
DA5 Eastern Road and Edward Street Area Development Area - proposed Strategic Employment Allocations (Appendix 2)



DA6 Hove Station Area Development Area - proposed strategic employment allocations (Appendix 2)

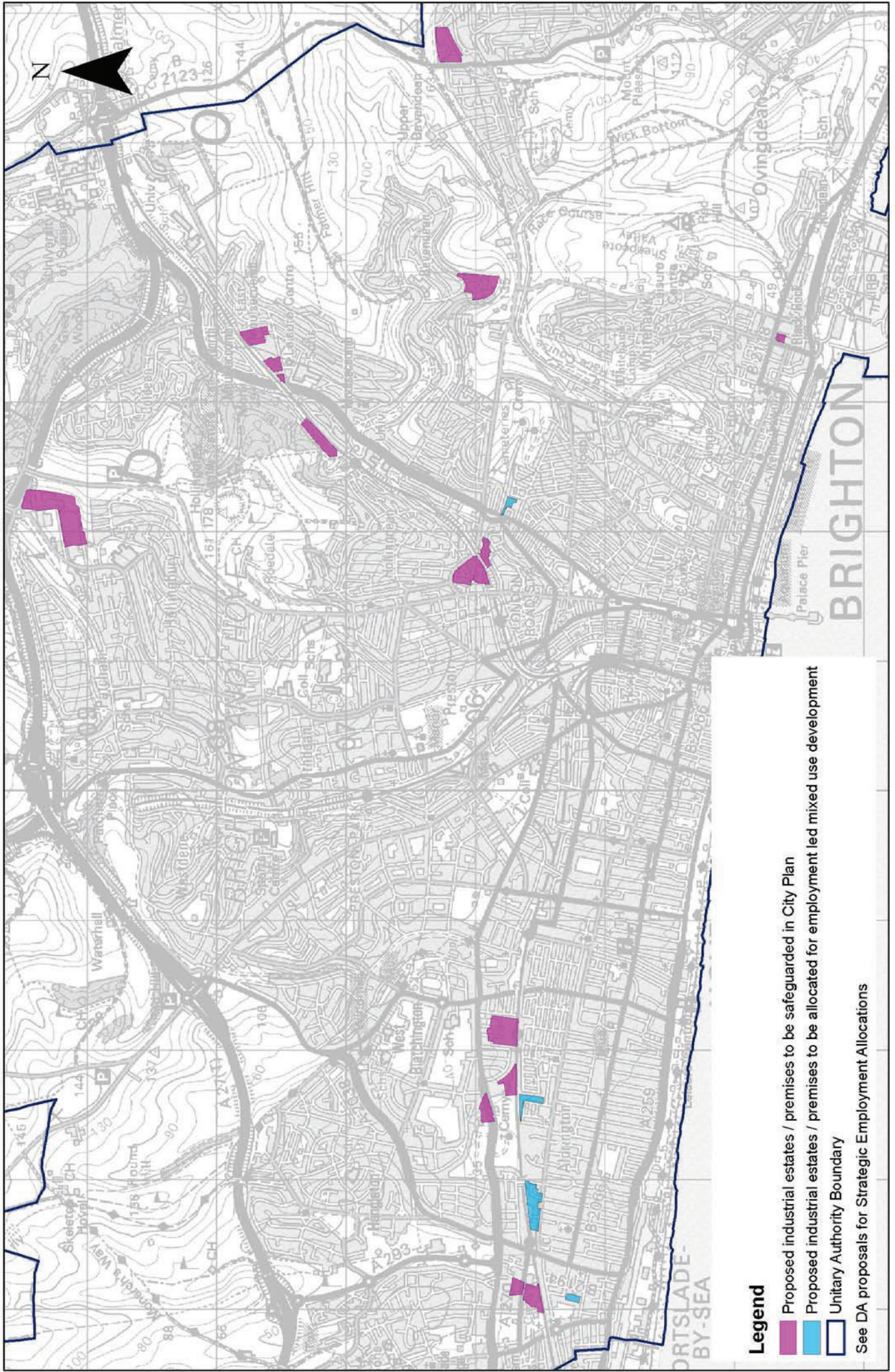


DA7 Shoreham Harbour Area Development Area - proposed strategic employment allocation (Appendix 2)





# Proposed Hierarchy of industrial estates / premises (Appendix 3)







Brighton & Hove  
City Council



# OVERVIEW AND SCRUTINY COMMISSION

## Agenda Item 44

Brighton & Hove City Council

<b>Subject:</b>		<b>Annual Complaints and Compliments Report</b>	
<b>Date of Meeting:</b>		<b>01 November 2011</b>	
<b>Report of:</b>		<b>Head of Policy, Performance and Analysis</b>	
<b>Contact Officer:</b>	<b>Name:</b>	<b>Brian Foley, Standards and Compliments Manager</b>	<b>Tel: 29-3109</b>
	<b>E-mail:</b>	brian.foley@brighton-hove.gov.uk	
<b>Wards Affected:</b>	All		

### FOR GENERAL RELEASE

#### 1. SUMMARY AND POLICY CONTEXT:

- 1.1 This report gives information on the feedback from complaints and compliments received by Brighton and Hove City Council during 2010/11 and compares that with data from the previous year.
- 1.2 The report highlights how complaint levels have changed during 2010/11 for the services receiving highest levels of complaints.
- 1.3 The report describes some of the actions identified from Stage One and Two complaints that have brought about improvements in services.

#### 2. RECOMMENDATIONS:

It is recommended that Overview and Scrutiny Commission note the report.

- 2.1 Overview and Scrutiny might wish to use the information contained within the report to look at specific service areas in more detail over the forthcoming year.

#### 3. RELEVANT BACKGROUND INFORMATION

- 3.1 Overall the level of complaints received by the council is reducing and compliments are consistently received across the organisation.
- 3.2 There are clear signs that the council takes the complaints it receives seriously and considers what it can do to improve services in response to that feedback.
- 3.3 The Council uses three main complaints process. The Standards and Compliments Team will give guidance to residents who wish to make a complaint. At the end of the local complaints procedure the matter can be referred to the Local Government Ombudsman. However, in some instances, for example, where a person is vulnerable or if there is need

for a speedy resolution, the Ombudsman will investigate the issue of complaint immediately.

- Corporate complaints account for the great majority of complaints. BHCC has a two stage process.
  - Complaints are initially referred to the service complained about where a manager will investigate the issues and reply to the complainant.
  - If the person is dissatisfied with the response they can then ask the Standards and Complaints team to carryout an independent investigation. This is Stage Two.
  - If still dissatisfied the complainant can then contact the Local Government Ombudsman.
- Adult Social Care is a statutory single stage process leading to Ombudsman.
  - Standards and Complaints Officers with specific knowledge of Adult Social Care liaise with the complainant and Services Managers to identify the best way to resolve the complaint.
  - The objective is to remedy the complaint and to learn from the experience so that services are improved.
  - If the complainant is dissatisfied they are advised to contact the Ombudsman.
- Children's Social Care is a statutory three stage process leading to Ombudsman.
  - When a child or young person raises a complaint they have a right to be supported by an advocate. Stage One complaints are referred to Service Managers to investigate and reply.
  - The second stage of the Children's Social Care complaints process is for an Independent Investigator to meet with the complainant and then interview the staff who are involved with the issue of complaint. The Investigator produces a report for the member of the public. The council then has to tell the complainant what it will do in response to the report.
  - If a person is unhappy with the outcome they can ask for a Stage Three Independent Review Panel. The Panel will listen to what the complainant has to say, consider the Investigator's report and reach a decision on what should happen next.
  - Finally, the complaint can be referred to the Ombudsman.

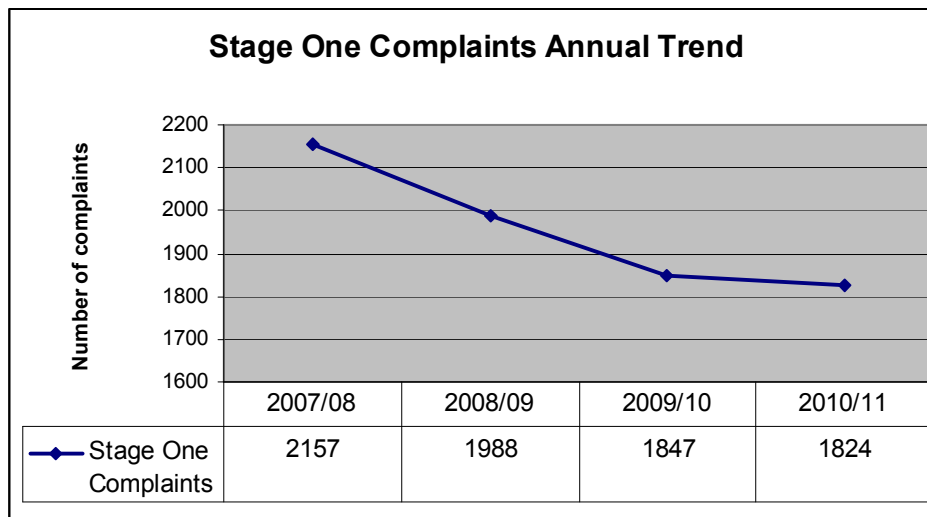
### **Commentary on Feedback**

- 3.4 There were 1824 Stage One complaints in 2010/11. The table below shows how Stage One complaint levels have reduced over the last four years and appear to have now reached a fairly consistent level.
- 3.5 With regard to Stage Two complaints the picture is much less clear. There was a significant increase in 2009/10 following a period of reducing referrals for investigation. The most likely explanation for the

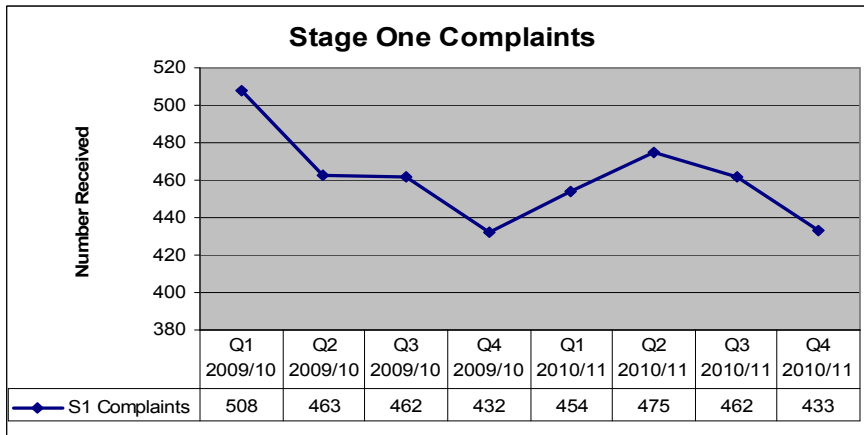
increase is that the complaint service became better publicised and all managers responding to complaints were consistently reminded to explain how to take the matter forward if the complainant was dissatisfied with the response. In 2010/11 Stage Two complaints have reduced.

3.6 The total number of enquiries made to the Ombudsman has been increasing. However, cases referred to the Ombudsman for investigation have been reducing more or less in line with the reduction in Stage One Complaints as illustrated below. The Ombudsman has taken steps to make their service more accessible and introduced an advice line service two years ago.

	2007/08	2008/09	2009/10	2010/11
<b>Stage One</b>	2157	1988	1847	1824
<b>Stage Two</b>	145	107	194	166
<b>LGO</b>	117	122	75	69



3.7 The quarterly records set out in the chart below for 2009 through to 2011 show that the overall volume of Stage One complaints is reducing even though there was an increase during Q2 and Q3 2010/11.



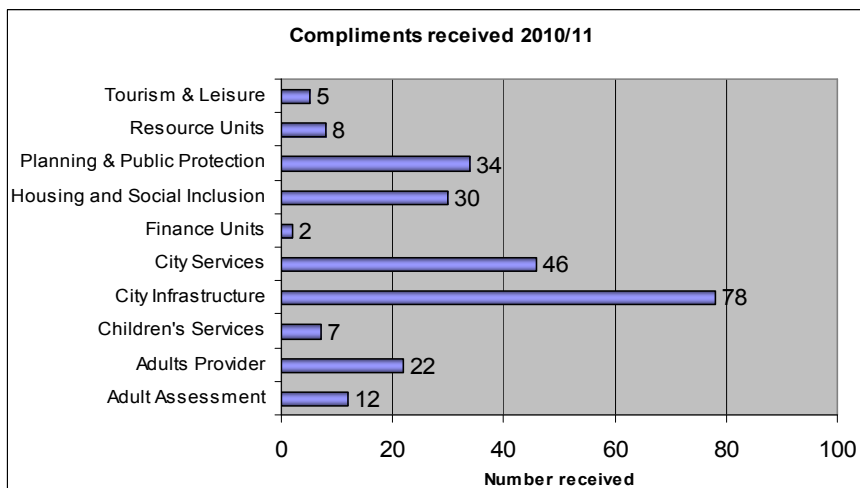
3.8 The table below shows the distribution of Stage One complaints between the various services provided by the Council.

<b>Stage One Complaints</b>	<b>2009/10</b>		<b>2010/11</b>	
Adults Assessment	<b>28</b>	1.5%	<b>37</b>	2.0%
Adults Provider	<b>82</b>	4.3%	<b>50</b>	2.7%
Children's Services	<b>109</b>	5.9%	<b>113</b>	6.2%
City Infrastructure	<b>771</b>	41.7%	<b>507</b>	27.8%
City Services	<b>292</b>	15.8%	<b>275</b>	15.1%
Finance Units	<b>4</b>	0.2%	<b>4</b>	0.2%
Housing and Social Inclusion	<b>411</b>	22.3%	<b>664</b>	36.4%
Planning & Public Protection	<b>88</b>	4.8%	<b>100</b>	5.5%
Resource Units	<b>17</b>	0.9%	<b>20</b>	1.1%
Tourism & Leisure	<b>45</b>	2.4%	<b>53</b>	2.9%

3.9 The significant changes in complaint levels have occurred in the following services:

- A reduction in complaints about City Infrastructure
- An increase in complaints about Housing and Social Inclusion
- Overall reduction in complaints about Adult Social Care

3.10 The chart below shows the distribution of compliments received in 2010/11.





## City Infrastructure

- 3.11 Parking complaint levels have reduced from 95 in 2009/10 to 30 in 2010/11, but no new schemes have been introduced. Consultation can generate complaints from people who do not want a scheme in their area, or who have worries about displacement, or concerns about detail such as positioning of pay and display machines.
- 3.12 For future schemes the council intends to do its utmost to ensure that all consultation is as clear as possible, goes through an agreed, tested process and that any decision-making based on the consultation is transparent via member meetings. One simple measure identified was to post reminders about the consultation process on lamp posts to ensure all residents are aware of the process even if their address is not held on the council's system.
- 3.13 Complaint levels for City Parks increased from 59 to 73. A significant number were about work carried out in Mile Oak Recreation Ground and Wild Park. Further changes were made to the park in Mile Oak and information was given about the work carried out in Wild Park.
- 3.14 City Parks have been taking much firmer approach regarding tenancy enforcement. The Allotments Team have used complaints feedback to identify they need to improve their record keeping systems and have a more robust system of contacting tenants in the event of potential breaches of their agreements. Volunteers and Council Officer have been reminded about the need for confidentiality and discretion.
- 3.15 During 2010/11 there have been 45 compliments recorded for City Parks. These included 18 compliments specifically about the "wonderful" and "beautiful" display of wild flowers along the central reservation of the Lewes Road these came from residents and people driving into the city. There were also compliments about "excellent and imaginative planting in various flower beds around the city". The Arboriculture service received several compliments regarding the very quick response time for trimming back overgrown trees.
- 3.16 Complaints about City Clean have reduced from 451 in 2009/10 to 240 in 2010/11 at Stage One. Stage Two complaints reduced from 19 to 14. There were no complaints to the Ombudsman in 2010/11.
- 3.17 An increase in Stage One complaints during the winter quarter corresponded with the effect of weather conditions but overall complaint levels have almost halved.
- 3.18 Factors which have contributed to this include the re-organisation of the contact centre. Information is now more readily available through the

website so there is less need for personal contact. Call times have improved greatly. Specific staff now deal with complaints quickly and efficiently and there is better link with operations staff so that problems are remedied before they become formal complaints. For example on a particular round smaller vehicles were introduced to ensure recycling collection could be consistently collected and this was coupled with close monitoring by the management team. A lot of work has been undertaken of working practices and systems to ensure they are streamlined and there for the purpose of assisting customers. Much work has been completed on improving customer services whether through the contact or social media.

- 3.19 There were 28 compliments for City Clean in the year in particular 4 compliments were received about the quick removal of graffiti and 9 focused on an efficient and thorough service provided by the street cleaning team.

### Housing and Social Inclusion

- 3.20 Overall there has been a rise in complaints at Stage One from 441 to 664. Stage Two complaints have increased from 46 to 56. Ombudsman Complaints reduced from 17 to 15.
- 3.21 Housing Needs complaints increased from 57 to 98 in 2010/11. The main focus of those complaints have been disagreement with Banding or dissatisfaction with the Temporary Accommodation provided. But this increase should be set in context of 16% increase in Homeless applications and changes to the Banding system which now places homeless people in Band C rather than immediately going to Band A and has meant fewer offers being made. Housing Needs has had a complete overhaul of their system but continue to manage within existing resources. In response to some complaints the Temporary Accommodation Team have introduced a Landlord pack which contains useful information and details of relevant contacts.
- 3.22 Housing Needs Stage Two complaints increased from 12 to 19. Ombudsman complaints increased from 2 to 6.
- 3.23 Housing Management has similarly seen an increase in the number of Stage One complaints received with the level rising from 150 to 189. The most significant complaint issues being Car Parks and Garages, and Anti-Social Behaviour.
- 3.24 Housing Income Management are reviewing the definition of vulnerability so this can be applied to their recharge policy. In Sheltered Housing work has been carried out to improve communications when major works are being carried out to reduce the tension that can be caused.

- 3.25 Housing Management Stage Two complaints remained the same in both years with 18 complaints. Ombudsman complaints reduced from 9 to 6.
- 3.26 The biggest increase in complaint activity in H&SI has been within Property and Investment. Complaint levels have risen from 187 to 342 over the year. However, to put this into context considerable amount of work has been undertaken by the council and Mears, our repairs and improvement partner, to bring stock up to the Brighton & Hove Standard.
- 3.27 Over the last six months officers from Property & Investment, Standards & Complaints and Mears have been meeting on a monthly basis to analyse complaints in detail and learn from the feedback. This has identified a number of service improvements including developing a new leaflet with residents that summarise the Brighton & Hove Standard and what it means for residents. We have received a number of enquiries in this area and the leaflet has helped improve communications with residents and improve understanding of the standard.
- 3.28 Feedback from complaints has also led to a number of changes with how the repairs partnership with Mears operates. Earlier this year a new appointments system was introduced to improve the customer experience and in September 2011 the teams receiving repair calls from residents and carrying out the repairs have been merged to improved communications internally and with residents. It is expected this will deliver immediate improvements in the service and a reduction in complaints over the coming quarters.
- 3.29 Property and Investment Stage Two complaints increased from 16 to 19. Ombudsman complaints reduced from 6 to 3.
- 3.30 The repairs Partnership received 25 compliments. The majority of compliments thanked the council for repair work carried out in properties and installation of new kitchens and bathrooms but compliments were also received for work carried out on shared garden areas.

### City Services

- 3.31 City Services receive the third greatest amount of complaints. The number of Stage One cases has reduced slightly from 292 to 275.
- 3.32 In Revenues complaints at Stage One reduced from 191 to 170. Through regular review of complaints performance the Revenues service has identified improvements to reduce complaints. For example, staff were reminded to be discreet when contacting employers about Attachments of Earnings. The team monitor complaints about Bailiffs

and take action where a pattern of poor conduct is established. The service is reviewing their refund procedure in response to customer feedback.

- 3.33 Stage Two complaints have reduced from 15 cases in 2009/10 to 9 cases in 2010/11. Complaints investigated by the Ombudsman reduced from 10 to 3 cases.
- 3.34 For Housing Benefits the level of demand for the service rose significantly during 2010/11 and it is therefore understandable that complaint levels increased from 61 to 76 Stage One cases. The Benefits Team have also been holding regular complaint review meetings. The complaint reviews and systems thinking have identified improvements such as a more consistent approach to applying underlying entitlement and appeal rights; where errors are made there will be prompt communication informing the customer that the claim is fine thereby avoiding unnecessary stress or confusion.
- 3.35 Stage Two complaints increased from 3 cases to 5. Complaints investigated by the Ombudsman reduced from 3 to 2.
- 3.36 There were 17 compliments received by the Benefits and Revenues service. These focused mainly on the communication skills of members of staff who were described as polite, calm, sensitive, patient, professional and efficient. Several of the compliments refer to staff making a difficult situation much easier because of these skills.
- 3.37 Life Events receive very few complaints but even so that team used complaints feedback to identify where improvements could be made to the service. This team received 9 compliments which commented on the politeness, enthusiasm and efficiency of the staff.
- 3.38 The Libraries Team received a wide range of feedback including 48 complaints which were resolved informally. There were 19 compliments and 79 comments and suggestions which often included compliments. The public have commented how helpful library staff have been and what excellent library facilities there are at the Jubilee Library.

#### Planning and Public Protection

- 3.39 The key services that receive complaints in this Delivery Unit are Development Control and Environmental Health.
- 3.40 Stage One complaints about Development Control and the Planning Decisions that arise remain static at 46 in 2009/10 and 45 in 2010/11. The complaint is almost always that a person disagrees with the

decision to grant or not to grant, whether that person is the applicant or an objector.

- 3.41 Generally, people are prepared to do what they possibly can if they disagree with a planning decision. Consequently, the proportion of cases escalating to Stage Two and to the Ombudsman is consistently higher than for any other service. In both years there were 11 Stage Two Complaints. In 2009/10 the LGO investigated 3 complaints and in 2010/11 they investigated 6 complaints. Consideration is being given to making planning minutes less detailed because the exact dialogue is available through the webcast. This will use officer time more efficiently.
- 3.42 To help put the work of Development Control into context there have been 21 compliments received. The compliments received largely focussed on the professionalism of the Planning Officers and the helpful advice and support they have given to members of the public.
- 3.43 For Environmental Health the main complaints are about Noise and Licensing. The total Stage One complaints increased from 28 to 40. Again there were relatively high levels of Stage Two complaints rising from 5 to 9 complaints.
- 3.44 The number of cases investigated by the Ombudsman increased from 1 to 6.
- 3.45 There were 13 compliments sent regarding the services provided by Environmental Health. Including 5 about the Hackney Carriage office responding to residents concerns about the conduct of licensed taxi drivers.

#### Adult Social Care, Assessor and Provider

- 3.46 In Provider Services there has been a noticeable reduction in the level of complaints received, falling from 82 to 50 in 2010/11 and for the Assessment Service there was an increase from 28 to 37. The teams have identified many improvements as a result of feedback from service users. Among the improvements identified a traffic light telephone system has been implemented so that staff can prioritise telephone calls received by service users to one of the contracted home care providers with more staff employed to cover the volume of calls at peak times. A series of training sessions have been developed for Provider Managers who complete Level 1 Safeguarding Investigations to improve the quality of their investigations and the confidence and skills of the managers who undertake them. All quarterly review meetings will now be attended by the Shared Lives Manager to ensure carers have the opportunity to discuss any difficulties and make action plans in a timely way.

3.47 Assessment Services received 12 compliments and Provider Services received 22 compliments. These compliments focused on the care and attention shown by carers and how much customers appreciated those services which were provided to allow people to continue to live independently.

### Children and Families

3.48 There has been very little change in the number of complaints received about Children and Families. Managers frequently identify where improvements can be made as a result of the complaints feedback they receive. There has been an assurance that within the Adoption process family finding for sibling groups will be carefully supervise with particular attention being paid to the complex needs of older sibling groups. At Child Protection Conferences more emphasis will placed on the wishes and feelings of children. A specific role has been created to focus on assisting young people to gain access to their personal records.

3.49 Children and Families recorded 7 compliments. These related to the efforts and sensitivity shown by Social Workers in very difficult situations involving young people.

### Ombudsman Decisions

3.50 The table below sets out the decisions arising from LGO investigations.

Service Area	Number	Discontinue investigation injustice remedied	Discontinuing Investigation	Local Settlement	Maladministration Causing Injustice	Maladministration No Injustice	No Maladministration	Not to initiate investigation	Ombudsman Discretion	Outside Jurisdiction	Premature Complaint	Withdrawn	Not Set
Adult Assessment	3	0	0	0	0	0	0	1	0	0	0	0	2
Adults Provider	1	0	0	0	0	0	1	0	0	0	0	0	0
Children's Services	19	0	0	3	0	0	8	1	2	3	0	1	1
City Infrastructure	9	0	1	4	0	0	1	1	0	2	0	0	0
City Services	6	0	2	0	0	0	1	0	1	2	0	0	0
Finance Units	1	0	0	0	0	0	1	0	0	0	0	0	0
Housing and Social Inclusion	15	0	3	2	0	0	5	1	2	1	1	0	0
Out of Council	1	0	0	0	0	0	0	0	1	0	0	0	0
Planning & Public Protection	13	0	1	0	0	0	6	1	1	1	0	1	2
Resource Units	1	0	1	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>69</b>	<b>0</b>	<b>8</b>	<b>9</b>	<b>0</b>	<b>0</b>	<b>23</b>	<b>5</b>	<b>7</b>	<b>9</b>	<b>1</b>	<b>2</b>	<b>5</b>

There have been no findings of Maladministration against the Council. A small proportion of the investigations resulted in local settlements which is where the Council agrees to resolve a complaint in a way recommended by the Ombudsman.

#### **4. CONSULTATION**

4.1 The Heads of key services were invited to comment.

#### **5. FINANCIAL & OTHER IMPLICATIONS:**

##### Financial Implications:

5.1 The costs of administering complaints and compliments are met within service budgets.

*Finance Officer Consulted: Anne Silley Date: 12 Oct 2011*

##### Legal Implications:

5.2 The Local Government Ombudsman was established by the Local Government Act 1974. The Act provides that before investigating a complaint, the Ombudsman must usually be sure that the council knows about the complaint and had a reasonable opportunity to investigate and reply. The council's complaint process provides the council with a proper procedure for dealing with complaints.

*Lawyer Consulted: Liz Woodley Date: 12 Oct 2011*

##### Equalities Implications:

5.3 The complaints processes provide members of the public who feel they have been discriminated against the opportunity to have their complaint independently investigated.

##### Sustainability Implications:

5.4 There are no sustainability implications

##### Crime & Disorder Implications:

5.5 There are no crime and disorder implications

##### Risk and Opportunity Management Implications:

5.6 The main risk in not dealing with complaints in a sensitive and professional manner is that the reputation of the Council will be damaged. Feedback from residents provides the organisation with the

opportunity to consider how it can change and improve services to meet the needs and demands of citizens.

Corporate / Citywide Implications:

5.7 The ability of the Council to respond to complaints in a timely and professional manner has an impact on what members of the public think about the quality of service. The organisation should be able to demonstrate that it changes and improves services in response to customer feedback.

**SUPPORTING DOCUMENTATION**

**Appendices**

1. None

**Documents in Members' Rooms**

1. None

**Background Documents**

1. None



# OVERVIEW AND SCRUTINY COMMISSION

**Agenda Item 45**  
Brighton & Hove City Council

**Subject:** Performance Reporting (Local Area Agreement)  
**Date of Meeting:** 1 November 2011  
**Report of:** Charlie Stewart, Strategic Director Resources,  
Brighton & Hove City Council  
**Contact Officer:** Name: Paula Black, Tel: 29-1740  
Head of Analysis & Performance  
Brighton & Hove City Council  
E-mail: paula.black@brighton-hove.gov.uk  
**Wards Affected:** All

## FOR GENERAL RELEASE/ EXEMPTIONS

### 1. SUMMARY AND POLICY CONTEXT:

- 1.1 The report provides Local Area Agreement (LAA) performance information to the end of March 2011, the closing data for the LAA.
- 1.2 There is one appendix to this report; this contains final statistical information for the Local Area Agreement where this is available. This was reported to Cabinet on 14 July 2011; some data has become available since then and is included here.
- 1.3 **'Local Area Agreement Summary Report'** (Appendix 1) The Local Area Agreement formed one strand of a city wide 'contract' which set priorities for Brighton and Hove and assessed how well we delivered against these. As this is a partnership agreement the responsibility for some indicators is shared across partner organisation across the city.

### 2. RECOMMENDATIONS:

- 2.1 That Overview & Scrutiny Commission notes results against the 2008-11 Local Area Agreement and our current organisational health.
- 2.2 That Overview & Scrutiny Commission notes that the Government has made changes to the national performance management framework. This affects the LAA in that performance is no longer monitored centrally in the same way and that the Performance Reward Grant previously attached to targets was removed.
- 2.3 That Overview & Scrutiny Commission notes that this will be the final LAA, since local authorities and strategic partnerships are no longer required to produce them.

- 2.4 That Overview & Scrutiny Commission notes that a new Performance and Risk Management Framework has been developed that contains city-wide performance priorities.

### **3. BACKGROUND INFORMATION**

- 3.1 After a broad and thorough consultation process in 2007, LAA targets were agreed by the Strategic Partnership as the main performance priorities in Brighton and Hove for 2008/11. During this process public sector partners, in collaboration with the third and private sector, agreed to 35 indicators selected from the National Indicator Set. In addition 22 local targets were selected which were felt to be a priority for the city.
- 3.2 This LAA was set for a three year period and was based on priorities determined at the time of negotiation. Our LAA was signed off by the Government Office for the South East.
- 3.3 The LAA was reviewed at the end of the second year to ensure that it continued to contain appropriate measures for our aspirations and those of our residents. The aspirations of our residents determined the Sustainable Community Strategy priorities.
- 3.4 The delivery of the Sustainable Community Strategy was monitored through the LAA. A family of partnerships, under the Local Strategic Partnership, are responsible for delivery and monitoring of activity. As such the LAA was a city-wide partnership performance agreement. It was also a statement of intent and aspiration. Each partner organisation continues to monitor its own performance in key areas.
- 3.5 The LAA was formed in the main from the National Indicator Set introduced in 2008, but subsequently cancelled in 2010. In some cases the national data sources will be unavailable until later in the year, whilst in others there is a significant time lag that can be up to three years (e.g. economic and sustainability indicators). Following the cancellation of the National Indicator Set a number of data collections for indicators ended so these can no longer be reported on.
- 3.6 Although the National Indicator Set has been discontinued the council is still required to report on around three quarters of the data sets that made them up. These data sets are specified in the Single Data List issued by the Department of Communities and Local Government.
- 3.7 The council and its partners are moving to a commissioning model of service delivery and the basis of this commissioning will be a robust evidence base for local needs and aspirations. This represents a significant shift away from the previous central Government driven framework that the LAA was part of.

3.8 Overview & Scrutiny Commission are invited to examine the information in Appendix 1, to see progress over the duration of the LAA and, where necessary, recommend additional action or reporting. Detailed action plans for each target were monitored by the Strategic Partnerships. Colours provide the direction of travel at the time of reporting:

<b>GREEN</b>	On target
<b>AMBER</b>	An area in need of improvement but close to achieving target
<b>RED</b>	Off-track

3.9 Overview & Scrutiny Commission is invited to note good progress between April 2008 and March 2011 in the following areas:

- L13a: reduced bullying in 11 – 16 year old age group
- NI051: effectiveness of child and adolescent mental health services (CAMHS)
- NI130: % Social care clients receiving Self Directed Support
- NI135: Carers receiving needs assessment or review
- L 23 (BV064): Private sector vacant dwellings returned into occupation
- NI141: Percentage of vulnerable people achieving independent living
- NI158: % non-decent council homes
- NI195c: Improved street and environment cleanliness – reduced graffiti
- L 06 (NI020): Number of 'Assaults with less serious injury
- L 07a&b (NI033a&b) - Arson incidents
- NI032: Repeat incidents of domestic violence
- NI040: Number of drug users recorded as being in effective treatment
- NI111: First time entrants (FTE) to the Youth Justice System

Overview & Scrutiny Commission is invited to note areas of on going challenge between April 2008 and March 2011 in the following areas:

- NI156: Number of households living in temporary accommodation
- NI047: The number of people killed or seriously injured in road traffic accidents
- L 22: Number of school age children in organised school visits

There is additional information and context for all of the above in appendix 1.

Please note that there are still a large number of targets where final data are not yet available. At least 10 targets will not have final data until late 2011 or into 2012.

### **Changes to the Reporting Framework**

3.10 The performance framework for managing the relationship between Central and Local Government has changed substantially over the last year. This change is

intended to reduce bureaucratic burdens and enable focus on genuine local priorities. All designations of local improvement targets have therefore been revoked and full control of LAAs was handed to local authorities.

- 3.11 LAA performance will not be monitored centrally and the 'Performance Reward Grant' was cancelled. There is not a requirement to make a new agreement in 2011.
- 3.12 The National Indicator (NI) set has been cancelled and replaced with the Single Data List, a list of all data returns that councils must make to central government departments and Arms Length bodies. These are comprehensive data sets and are not performance indicators, though some of the data sets previously informed the NI set.
- 3.13 In future the City Performance Plan (CPP) will be the main mechanism to monitor and manage the city's performance against the outcomes defined in the Sustainable Community Strategy. The CPP will be reported to the Strategic Partnership, the Public Service Board, Cabinet and Overview and Scrutiny Commission every six months. Once targets are attached to the Plan it will be returned to Overview and Scrutiny Commission.
- 3.14 The council is developing a new Corporate Plan for 2011-2015. This will describe in summary the priorities of the council as an organisation, providing context and direction for people who receive services from the council and those who work for the authority. It will include a series of indicators to measure the priorities and these will be reviewed each year as part of refreshing the Plan to ensure relevance and robustness.
- 3.15 The council also continues to monitor and manage a set of organisational health measures. The Organisational Health Report builds on similar reports from previous years, designed to help Strategic Leadership Board (SLB) and the Corporate Management Team (CMT) manage the organisation. Progress reports on priority indicators will be considered by SLB monthly and reports on the full suite of indicators will be reported every six months to Cabinet and Overview & Scrutiny.

#### **4. CONSULTATION**

- 4.1 The Local Area Agreement 2008-2011 priorities were set in negotiation with the Local Strategic Partnership and the Government Office South East (GOSE).

#### **5. FINANCIAL & OTHER IMPLICATIONS:**

##### Financial Implications:

- 5.1 The LAA financial incentive (Performance Reward Grant) was removed, however, the partnership working through the LAA and the performance results supported the delivery of value for money strategies.

*Finance Officer consulted: Anne Silley*

*Date: 7 June 2011*

Legal Implications:

- 5.2 Local Area Agreements and the National Indicator Set were abolished in October 2010. Local Authorities are now required to provide to Central Government the information set out on the Single Data List described at paragraph 3.7 of the report.

*Lawyer consulted:*

*Elizabeth Culbert*

*Date: 13 June 2011*

Equalities Implications:

- 5.3 The performance management framework aims to incorporate monitoring of progress against equalities and inclusion outcomes in the city.

Sustainability Implications:

- 5.4 The performance management framework aims to incorporate monitoring of progress against sustainability outcomes in the city.

Risk and Opportunity Management Implications:

- 5.5 The management of performance is important and contributes to avoiding the risk that the council's improvement priorities will not be delivered. Progress against performance indicators informs our risk and opportunity management assessments.

Crime & Disorder Implications:

- 5.6 Reducing crime and disorder was a central theme of the Corporate Plan and the Local Area Agreement and monitoring progress against these outcomes is a key element of the proposed new performance management framework.

Corporate / Citywide Implications:

- 5.7 Cabinet, Public Service Board, the Strategic Leadership Board and the Corporate Management Team will get updates on the Performance and Risk Management Framework and City Performance Plan; this allows for both a regular overview of performance and more spotlighted discussions on areas that require additional discussion. These discussions will feed into the service planning timetable and establishment of a new corporate plan in the future. This is an essential part of the council's performance management framework.

**SUPPORTING DOCUMENTATION**

Appendix 1. Local Area Agreement Summary Report








## Brighton and Hove City Council LAA Summary Scorecard Report

Period:  
2010/11


### Improving health & well being

<i>PERFORMANCE INDICATOR</i>	<i>UNIT</i>	<i>TARGET</i>	<i>ACTUAL</i>	<i>STATUS</i>
<b>L 11 (NI054) - Services for disabled children</b>	No.	no target	no data	
<p>Data for this national indicator was stopped so it is not possible to present a final result. There is no status as this indicator is not targeted. When data was available, nationally parents rated the services received by their disabled child as 59 out of 100. In Brighton and Hove parents rated the services received by their disabled child as 58 out of 100. A higher score denotes greater satisfaction with services.</p>				
<b>L 12 - Percentage of contacts and enquiries resolved at the access point</b>	%	90.00	93.00	 GREEN
<p>The Access Point consistently performed above target throughout the LAA, resolving many enquiries and improving the quality of service and care for customers. During the LAA period Access Point has been resolving over 2,000 contacts and enquiries each month.</p>				
<b>L 13a - Reduce the number of 11-16 year olds completing the Safe at School Survey who state that they have been bullied</b>	%	19.00	17.00	 GREEN
<p>There has been a significant reduction in bullying in this age group. It has dropped from a high of 29% in 2004, also down during the LAA from 22% in 2008/09. Schools attribute this improvement to the implementation of SEAL (Social and Emotional aspects of learning) a national strategy, more effective survey delivery and the role of support staff in responding quickly to bullying.</p>				
<b>L 13b - Reduce the number of 8-11 year olds completing the Safe at School Survey who state that they have been bullied</b>	%	23.00	23.70	 AMBER

Bullying has reduced across Primary schools significantly. In 2004 it stood at 36% and has consistently reduced since then. Also, where there were greater instances of bullying in some schools this has now reduced to be in line with schools across the city.

**L 14 - Reduction in suicide per 100,000 population**                      **No.**                      **12.10 not yet available**


The result is based on a three-year rolling average. Note that the most recently published data was for 2007-09. This gave a rate of 13.22 with an upper confidence level (95%) of 15.72 and lower of 10.52. Data received so far does not show a statistically valid decrease. 2008-10 data will be published in December 2011.

**L 15 - Increase uptake of risk assessment screening for hypertension and cholesterol in general practice**                      **%**                      **72.80**                      **71.50**                       **AMBER**


The number of patients screened over the last three years has been consistently just under target. However it is worth noting that the numbers of patients on register has increased, so the final percentage figure actually represents a positive result as higher number of screenings are taking place enabling preventative action at an early stage, although it is a slightly smaller proportion of all patients. The PCT is continuing with the roll-out of the NHS Health Checks programme that aims to identify high blood pressure along with other risk factors such as obesity.

**L 16 - Take up/offer of 'talking therapies'**                      **No.**                      **5,482.00**                      **4,256.00**                       **RED**

4,256 people had received psychological (or 'talking') therapies by March 2011, lower than target of 5,482. This has been discussed with the Strategic Health Authority who have agreed for the target period to be extended to October 2011 since the programme did not begin properly until October 2008.


**NI039 - Rate of Hospital Admissions per 100,000 for Alcohol Related Harm**                      **No.**                      **2,010.00**                      **2,004.95**                       **GREEN**

The LAA target was to limit the increase in hospital admissions for alcohol related harm over the three years to 3% less than the expected rise for this period. While the number of admissions in the city has been better than the targets, the continuing increase in admissions remains a cause for concern.

**NI051 - Effectiveness of child and adolescent mental health (CAMHS) services**                      **No.**                      **16**                      **16**                       **GREEN**

We have achieved the maximum level each year for this measure. The CAMHS service undertake a self assessment that evaluates performance in 4 areas from 1-4 (4 being the best). This result is the addition of those scores.



<b>NI056d - Obesity in primary school age children in year 6 - percentage of children measured this year who are obese</b>	<b>%</b>	<b>17.50</b>	<b>15.50</b>	 <b>GREEN</b>
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The results for percentage of obese children in year 6 has decreased during the year and are better than the national average (18.3%), although the change is not statistically significant.

<b>NI059 - Percentage of initial assessments for children's social care carried out within 7 working days of referral</b>	<b>%</b>	<b>78%</b>	<b>45%</b>	<b>no colour</b>
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There has been a major change in guidance for this work from 1 April 2010. The revised Working Together to Safeguard Children guidance set out that an initial assessment should be completed within 10 working days of a referral (where a decision has been taken that one is required) rather than the previous timescale of seven days. As recommended by Ofsted there has been a change in process so all children are now seen as part of the Initial Assessment within 10 working days of referral.

<b>NI112 Under 18 conception rate per 1000 population of 15-17 year olds</b>	<b>No.</b>	<b>26.40</b>	<b>not yet available</b>
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There is a 14 month time-lag in this data so the final result will not be available until 2012. The under 18 conception rate has dropped in the city over the last three years, though not quickly enough to meet the LAA targets. Latest data to December 2009 is 36.8 per 1000 women aged 15-17, a total of 149 conceptions; The rate has declined by 24.1% between 1998, the baseline year and 2009. This is higher than the South East (30.1 per 1000, a 20.4% reduction) but lower than the national average (38.2 per 1000, a 18.1% reduction). In comparison to other local authorities, Brighton & Hove's rate is considered to be low and decreasing; it is also lower than would be expected based on the level of deprivation experienced across the city.

<b>NI116 - The percentage of children under 16 living in households in receipt of out of work benefits</b>	<b>%</b>	<b>17%</b>	<b>not yet available</b>
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Time-lagged data mean it is not possible to determine this yet. The proportion fell year on year from 23.4% in 2004 to 20.3% in 2008. This data is pre-recession and does not provide a picture of current performance. Data for 2010 will not be available until 2012.

<b>NI119 - Self-reported measure of peoples overall health and wellbeing</b>	<b>%</b>	<b>no data</b>	<b>no data</b>
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This information was to be collected through the Place Survey, which was cancelled by Government, so no result will be available. It was to have shown people's perception of their own overall health and wellbeing, recorded using a series of measures to gauge different aspects of their health.

<b>NI123 - Stopping smoking</b>	<b>No.</b>	<b>946.00</b>	<b>1081.5</b>	 <b>GREEN</b>
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This result represents 2,308 people who have successfully stopped smoking for over 4 weeks while receiving help from the NHS Stop Smoking Service.

<b>NI130 - % Social care clients receiving Self Directed Support</b>	<b>%</b>	<b>30.00</b>	<b>33.50</b>	 <b>GREEN</b>
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There has been a significant improvement in this key measure of personalisation of people's care during the LAA. Not all service users are able to have self directed support; this represents the majority of those people in the city who can access services in this way (1367 people out of 4083 service users).

<b>NI135 - Carers receiving needs assessment or review and a specific carer's service, or advice and information</b>	<b>%</b>	<b>22.00</b>	<b>35.70</b>	 <b>GREEN</b>
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The council has exceeded the target during each year of the LAA, increasing from 19% in the first year to nearly 36% by the close.

<b>NI150 - Adults receiving secondary mental health services whilst in paid employment</b>	<b>%</b>	<b>3.3</b>	<b>not yet available</b>	
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Brighton & Hove was required to show a statistically significant improvement over the three years for this indicator. There was a small improvement from 3.3% in 2008/09 (30 people) to 3.8% in 2009/10, but this still represents small numbers of people in paid employment. Awaiting final data for 2010/11: the Department of Health cleanses all data received and publishes the final results. This will be before the end of 2011.

## Improving housing & affordability

<b>PERFORMANCE INDICATOR</b>	<b>UNIT</b>	<b>TARGET</b>	<b>ACTUAL</b>	<b>STATUS</b>
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<b>L 23 (BV064) - Private sector vacant dwellings returned into occupation or demolished</b>	<b>No.</b>	<b>153.00</b>	<b>154.00</b>	 <b>GREEN</b>
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This is an interim result for 2010/11 and will probably increase. Further empty properties are likely to be counted once verification from Council Tax records has been received, as has happened in each of the previous years. The target has been consistently exceeded throughout the LAA.

<b>L 24 (LT31) - Reduce the number of rough sleepers</b>	<b>No.</b>	<b>10.00</b>	<b>14.00</b>	<b>no colour</b>
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The methodology for counting rough sleepers has been changed by the government so this result is not comparable to previous results or the target. Actions to address rough sleeping in the city are contained within the Single Homeless Strategy 2009-14.

**L 25 - Number of (fire) Home Safety Visits carried out**      **No.**      **2,842.00**      **2,697.00**       **AMBER**

Although slightly worse than target for the final year of the LAA the number of fire home safety visits was higher than target for 2008/09 and 2009/10, so that overall the number of visits is just below that initially required.

**NI141 - Percentage of vulnerable people achieving independent living**      **%**      **68.00**      **72.20**       **GREEN**

This area has consistently performed well, better than target throughout the LAA at around 72% of Supporting People service users moving on from supported accommodation in a planned way.

**NI154 - Net additional homes provided**      **No.**      **570 (1710) not yet available**

The final result will be available in September 2011. Numbers of homes completed so far are 721 in 2008/09 and 380 in 2009/10 giving a cumulative total of 1101 by March 2010, against a target of 1140 for the same period. The target for the 3-year period is 1710.

The lower result in 2009/10 is being addressed by Building New Council Homes Tenant Working Group and Housing Revenue Account (HRA) Estates Master Plan. Work is being undertaken to identify sites and properties across the City that have potential for development, refurbishment or regeneration. Housing Management Consultative Committee & Cabinet have approved:

- The development of a comprehensive estates master plan in partnership with tenant representatives to inform best use of HRA assets and identify opportunities to build new Council homes
- The development of procurement, design and delivery options for new Council housing on up to 800 identified sites

The indicator shows the net increase in homes over the year, taking into account new builds, changes in use, demolitions and conversions. The result for additional homes is counted at the point that new properties have a roof, not at the point that they are occupied.

**NI156 - Number of households living in temporary accommodation**      **No.**      **333.00**      **501.00**       **RED**

Target of 333 was set by to be met by April 2010 and this was achieved (316). This relates to statutory homeless households in Temporary Accommodation, the majority of which are good quality self contained flats and houses amongst the private sector housing stock, leased from between 5 – 10 years.

The figures have increased since April 2010; there has been an increase in homeless presentations and a decrease in available properties for rent in the private sector at Local Housing Allowance levels, as we are seeing the impact of the changes to LHA rates in the private sector. However, the accommodation provided is stable, secure and of a good quality.

**NI158 - % non-decent council homes**      **%**      **26.00**      **25.97**       **GREEN**

There has been significant good progress in this area. BHCC homes not meeting the Decent Homes Standard have dropped from 56.6% at the start of 2008 to under 26% by March 2011 and the council has met target for the end of the LAA. Work continues to improve the council's housing stock, with the forecast for March 2012 for only 12% not to meet the Standard.

## Promoting enterprise & learning

PERFORMANCE INDICATOR	UNIT	TARGET	ACTUAL	STATUS
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**L 01 - Progress towards the development of the Brighton Centre**      %      0.00      0.00      no colour

There is no status for this indicator as it does not have results or targets as such; it is here to enable us to comment on the progress made towards the development of the Brighton Centre.

Standard Life dispatched the Contract Notice for publication in OJEU on 13 January 2009 to initiate the procurement process to appoint a Lead Architect and the professional development team to undertake a first stage feasibility design and study. 'Make' architectural team appointed as lead consultant for the development of the Brighton Conference Centre site – 27 July 2009.


The next agreed stage of work will be for Standard Life to begin feasibility work with their professional team. To date this has been delayed whilst further reports are undertaken with their cost consultants. A revised programme is due to be agreed for this work in 2011.

**L 02 - Gross Value Added Per Head**      £      18,685.00 not yet available


There is a significant time-lag in the data: 20,659.00 is the latest information available and relates to 2008. GVA (Gross Value Added) is a measure of the value of the local economy. A relatively high GVA per head indicates that the local economy is healthy and productive.

**L 04 - Improve the visitor economy (£million)**      £      440.70 not yet available

The total spend made by visitors on their trip to the city in 2009 was an estimated £732.3million. There is a significant delay in capturing final information for this indicator and this will not be available until at least 2012.

**NI079 - Achievement of a Level 2 qualification by the age of 19**      %      82.00      79.10       **AMBER**

While below the LAA target, performance has improved over the last four years to just over 79%, from 70.9% in 2007/08; in 2004 the result was 64%. This is above the latest national result of 78.7%, but lower than our statistical neighbours in the South East who scored 80.4%.

**NI117 - 16 to 18 year olds who are not in education, employment or training (NEET)**      %      6.7%      7.5%       **AMBER**

The annual 16-18 NEET rate is calculated as an average of November, December and January figures. The current economic conditions appear to be contributing to the rise in numbers. Many of the NEET group are falling out of employment rather than education or training.

**NI152(i) - Percentage of the working age population claiming out of work benefits**      %      gap -1% to national      **not yet available**

Data is not yet available for this measure, which was to be judged on how Brighton & Hove compared to the England average as of May 2011. The latest figures are up to November 2010, when 24,600 people were claiming out of work benefits, a rate of 14.9%. This compares to 14.5% for Great Britain in the same period, so would be within the target threshold.

**NI163 - Proportion of working age people qualified to Level 2 or higher**      %      **79.00**      **not yet available**

There is a significant time-lag for this data. The result for the calendar year 2009 is 75.5%, which is the latest available. The national result for 2009 was 65.4%.


**NI171 - New business registration rate per 10,000 of the population (VAT and PAYE)**      No.      **68.00**      **not yet available**

Business registrations are a proxy measure for business start-ups (actual measure is VAT and PAYE per 10,000 pop).

The latest available information of 63.3 is for 2008. The target has been adjusted to reflect the impact of the recession and a change to baseline information.

In the Centre for Cities report for 2010, Brighton was highlighted as having the 6th highest business birth rate (out of 64 other areas – 49.6%) - this is compared with a business death rate of 42.4%. As well as featuring in the top ten for business births we also feature in the top ten for high skilled workforce and knowledge intensive industries – this highlights our high rate of entrepreneurial activity.

## Promoting resource & enhancing the environment

<i>PERFORMANCE INDICATOR</i>	<i>UNIT</i>	<i>TARGET</i>	<i>ACTUAL</i>	<i>STATUS</i>
<b>L 26 (NI185) - CO2 emissions (tonnes) from local authority operations</b>	No.	31,412.24	31,612.70	

This includes CO2 emissions from civic buildings, school buildings, street lighting and illuminated bollards, business travel mileage and vehicle fleet mileage.

A carbon footprint was produced in 2008/09 and it was estimated that Brighton & Hove City Council produced 33,195 tonnes of CO2. The authority is aiming for a year on year 4% reduction between 2007-2012. This equates to achieving less than 31,412 tonnes of CO2 emissions in 2010/11.

Collection of emissions data is complex and while much work has been done to improve the accuracy and reliability of the council's carbon footprint there is still more to do. Data collection is improving year on year and this often means that more data is accounted for within calculations. Even though we have seen a reduction between 09/10 and 10/11 it is likely that the rate of reduction is greater than the data tells us and we will be looking to restate footprints to reflect this, within the next couple of months. The result reported here is based on the best information we have available at this moment in time.

**NI186 - Per capita reduction in CO2 emissions in the LA area**                      %                      **12.00**    **not yet available**

Data for this target has a significant time-lag. Emissions stood at 5.45 tonnes per person in 2007, and dropped to 5.30 tonnes in 2008. While this is some way off target was aspirational and possibly over ambitious. We are performing to similar levels of comparable authority areas and are reducing emissions at a greater rate than the England Average. Due to the relatively small industrial sector in Brighton and Hove we are limited in the reductions that are possible. Brighton and Hove has performed well in reducing domestic sector emissions, which are the main contributor to CO2 emissions in Brighton and Hove.

**NI187a - Tackling fuel poverty - % of people receiving income based benefits living in homes with a low energy efficiency rating**                      %                      **11.20**                      **no data**


This indicator has been cancelled and there will not be data for 2010/11. Brighton & Hove had been doing well before this, performing better than target in both 2008/09 and 2009/10.

At the Spending Review in October 2010 the Government announced it would commission an independent review to take a fresh look at the fuel poverty target and definition, to focus available resources where they will be most effective in tackling the problems of underlying fuel poverty. The review will publish interim findings, based on the analysis conducted, in autumn 2011 and a final report to Government no later than January 2012.

**NI187b - Tackling fuel poverty - % of people receiving income based benefits living in homes with a high energy efficiency rating**                      %                      **34.00**                      **no data**

This indicator has been cancelled and there will not be data for 2010/11. Brighton & Hove had been doing well before this, performing better than target in both 2008/09 and 2009/10.

At the Spending Review in October 2010 the Government announced it would commission an independent review to take a fresh look at the fuel poverty target and definition, to focus available resources where they will be most effective in tackling the problems of underlying fuel poverty. The review will publish interim findings, based on the analysis conducted, in autumn 2011 and a final report to Government no later than January 2012.

**NI195c - Improved street and environmental cleanliness - levels of graffiti**                      %                      **6.00**                      **2.00**                       **GREEN**

There has been good progress in reducing graffiti in the city and levels have both been lower than target throughout the LAA and also consistently getting lower. This data is no longer being collected to the same definition so this final result is up to November 2010.

## Promoting sustainable transport

PERFORMANCE INDICATOR	UNIT	TARGET	ACTUAL	STATUS
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**NI167 - Congestion - average journey time per mile during the morning peak**      **No.**      **3.63**      **not yet available**

There is a significant time-lag for this data; the latest information is from 2008/09 when the result was 3.45. It represents the average journey time per mile (minutes) during the morning peak traffic flows. The target for this indicator was to maintain the baseline journey time figure for the duration of this LAA.

**NI175 - Access to services and facilities by public transport, walking and cycling**      **%**      **93.00**      **not yet available**

There is a significant time-lag for this data. The result for 2009/10 was 87% and is the latest available. This indicator measures accessibility to doctors' (GP) surgeries based on the proportion of the population within a 10 minute journey time from a surgery. During the period of this LAA, the PCT has overseen the relocation of a number of smaller, more localised GP surgeries in the Preston and Carden areas to larger sites at 175 Preston Road and Carden Hill respectively. These changes in location, rather than transport provision, are considered to be the main reason for the current level of performance, as most journeys within 10 minutes could only reasonably be expected to be carried out on foot and by bike using existing roads and pavements and no additional routes have been built. In addition, there are now higher frequencies on some of the core bus routes in the city. It is noted however that accessibility within the 15 minute journey time threshold has remained constant from 2008 to 2010 at a very high level of 97%. Therefore, it could be concluded that the adoption of the 10 minute journey time for this indicator was too ambitious.

## Reducing crime & improving safety

PERFORMANCE INDICATOR	UNIT	TARGET	ACTUAL	STATUS
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**L 05 (NI026) - Specialist support to victims of a serious sexual offence**      **No.**      **not set**      **no data**

This indicator was not put into practice. Data collection was being piloted during 2009/10 and it was decided that the measures would not be robust.


The Sexual Assault Referral Centre in Crawley has been providing support to victims from Brighton & Hove since September 2008.

**L 06 (NI020) - Number of 'Assaults with less serious injury' offences**      **No.**      **1785**      **1710**       **GREEN**

There has been consistent progress in the city with a year-on-year decrease in the number of assaults with less serious injury since 2005/6. During the LAA the results have been 1877 in 2008/09 and 1839 in 2009/10. Partnership work to manage the night time economy is well established and has supported this long term decrease.

**L 07a (NI033a) - Arson incidents - Deliberate primary fires per 1000 population**      **No.**      **0.71**      **0.64**       **GREEN**

Good progress has been made during the LA in reducing the number of arson incidents. This result reflects 163 incidents, with figures shown as incidents per 1000 population. A primary fire is a major fire involving property, casualties or 5 or more appliances.

**L 07b (NI033b) - Arson Incidents - Deliberate secondary fires per 1000 population**      **No.**      **1.12**      **0.85**       **GREEN**

Good progress has been made during the LA in reducing the number of arson incidents. This result reflects 225 incidents, with figures shown as incidents per 1000 population. A secondary fire is a major fire involving property, casualties or 4 or fewer appliances.

**L 08 - Number of Police recorded LGBT hate crimes and incidents**      **No.**      **0.00**      **72.00**

This indicator is currently not targeted. It was included to monitor the effectiveness of work that prevents LGBT hate crimes and incidents, while also seeking to increase reporting of incidents. There is a difficulty in setting targets, because it is not possible to analyse the number of incidents actually taking place compared to an increasing likelihood that they will be reported. However, numbers recorded have decreased during the LAA, with 133 in 2008/09, 88 in 2009/10 and 72 in 2010/11.

**L 09 - Number of police recorded racist and religiously motivated crimes and incidents**      **No.**      **0.00**      **215.00**

This indicator is currently not targeted. It was included to monitor the effectiveness of work that prevents racist and religious hate crimes and incidents, while also seeking to increase reporting of incidents. There is difficulty in setting targets, because it is not possible to analyse the number of incidents actually taking place compared to an increasing likelihood that they will be reported. However, numbers recorded have decreased during the LAA, with 320 in 2008/09, 285 in 2009/10 and 215 in 2010/11.

**NI017 - Perceptions of anti-social behaviour**      **%**      **32.50**      **no data**

This shows the proportion of people who think that anti-social behaviour is a problem. This information was to be collected through the Place Survey, which was cancelled by Government, so no result will be available. The 2008 Place Survey gave a result of 19.4%; this was received after the target had been negotiated with GOSE and was substantially better than target.

**NI030 - The number of convictions for Prolific and other Priority Offenders (PPOs) over a 12 month period**      **No.**      **not set**      **not yet available**



Data will be available in October for this target. As of December 2010 the result stood at 172: local data indicates that the year end number of offences committed is in the range between 179 and 259 offences (from a baseline of 283 offences).

The final target was to have been confirmed by the Government Office for the South East and the Home Office after they had analysed information about the PPO cohort for 2010/11. This will not be set now.


<b>NI032 - Repeat incidents of domestic violence</b>	<b>%</b>	<b>28.00</b>	<b>23.30</b>	
				<b>GREEN</b>

The number of repeat MARAC (Multi-Agency Risk Assessment Conference) cases during 2010/11 has been better than target, though higher than last year (16.8%).


The representation at the MARAC is still very good with a lot of statutory and third sector agencies in attendance and the plans around these victims remain fit for purpose acknowledging some of the challenges faced with some of the referrals.

<b>NI038 - Drug related (Class A) offending</b>	<b>No.</b>	<b>0.93</b>	<b>not yet available</b>	
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There is a significant time-lag on this data, with 2010/11 data being available later in 2011. This target represents the ratio of actual against predicted reoffending by Class A drug users (i.e. if the number of actual offences was the same as the number of predicted offences this would equal a ratio of 1). The latest available result is up to December 2010 with a ratio of 1.02, worse than the annual target of 0.93. Three prolific and other priority offenders have been identified whose offending is above the predicted level, who are most at risk of reconviction, and who will be targeted intensively.

<b>NI040 - Number of drug users recorded as being in effective treatment</b>	<b>No.</b>	<b>1187</b>	<b>1220</b>	
				<b>GREEN</b>

The target was to increase the number of drug users recorded as being in effective treatment by 3% over the LAA period. The number of drug users in effective treatment is defined as those Class A drug users [opiates and/or crack cocaine] who are in treatment for twelve weeks or more, or who are subject to a planned discharge within twelve weeks.

<b>NI047 - The number of people killed or seriously injured in road traffic accidents in the calendar year</b>	<b>No.</b>	<b>123.00</b>	<b>136.00</b>	
				<b>RED</b>

While this is above the target set for the LAA this does still represent an improvement: both this year's result and three year rolling average are the lowest figures that have been recorded since before the inception of the LAA. This is the calendar year result for 2010. Eight of these incidents were fatalities, with the remainder being serious injuries. The target is based on a three year rolling average. The three year rolling average for 2010 was 142.3. This area will continue to be monitored in the new City Performance Plan.

**NI111 - First time entrants (FTE) to the Youth Justice System aged 10-17**      **No.**      **245.00**      **170.00**       **GREEN**

There has been very positive progress in this area. There have been 170 FTEs recorded for the full performance year 2010/11. This compares to 251 in 2009/10 which is a reduction of 81 young people. This is the lowest number of FTEs recorded in the last ten years.

The Police have now fully rolled out Community Resolution (CR) which uses a restorative justice approach as an alternative to a police or court disposal. From January to May 2011, 114 young people have taken part in CR.


## Strengthening communities & involving people

PERFORMANCE INDICATOR	UNIT	TARGET	ACTUAL	STATUS
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<b>L 17 (NI001) - % of people who believe people from different backgrounds get on well together in their local area</b>	%	N/A	N/A	
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This information was to be collected through the Place Survey, which was cancelled by Government, so no result will be available.

The result from the 2008 Place survey was 86.1%, the UK average was 76.4% and the South East Average was 78.9%.

<b>L 18 (NI008) - Adult participation in sport and active recreation</b>	%	22.70	24.70	 <b>AMBER</b>
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This indicator measures the percentage of the adult population participating in sport or active recreation 3 days a week. The result shown is taken from the 'Active People Survey' (APS) 4 which was conducted over the financial year of 2010/11. However, this result is not a statistically significant improvement on the original result of 22.7% as the confidence interval of 3.7% means that the result is a band between 21% and 28%.

<b>L 21 - Community engagement in local libraries</b>	%	100.00	100.00	
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This indicator tracks progress against many activities detailed in the LAA delivery plan. These include targets on the number of physical and virtual visits, new stock added, the number of library members, customer satisfaction levels, programs to support childrens' reading (Bookstart) and many others. Currently all elements of the plan are progressing as expected so the result is assessed at 100%. This indicator will fall below 100% if any of the actions within the plan are not green or amber.

<b>L 22 - Number of school age children in organised school visits to museums</b>	No.	34,448.00	33,065.00	 <b>RED</b>
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This target has not been met. The main area where numbers have been lower is in Museum partner outreach sessions. This relates to outreach activity using objects from the Royal Pavilion & Museums collections and developed by the RP&M but delivered via other Museum partners within the region i.e. East Sussex Museums & Archaeology Project, Bexhill Museum, Horsham Museum & Henfield Museum. After a two-year partnership two of these four partners (Bexhill & Henfield) dropped out of scheme during 2009/10 resulting in far fewer pupils being reached. Since the target was agreed based on this partnership it became considerably more difficult to achieve as a consequence.

**NI004 - % of people who feel they can influence decisions in their locality**                      %                      **30.60**                      **no data**

The information was to have been collected through the Place Survey. However, the Place Survey was cancelled by Government and there has been no further data available during the LAA.

**NI006 - Participation in regular volunteering**                      %                      **26.90**                      **no data**

The information was to have been collected through the Place Survey. However, the Place Survey was cancelled by Government and there has been no further data available during the LAA.

**NI007 - Environment for a thriving third sector**                      %                      **24.80**                      **not yet available**

Data is not yet available for this target. The results will be taken from the National Survey of Third Sector Organisations conducted in 2010. Results from that survey have not yet been released.

This indicator measures the positive contribution that local government and its partners make to the environment in which independent third sector organisations can operate successfully; a high result is better. The result in 2009/10 of 19.8% compares well to the national result of 16.2%.

**NI011 - Engagement in the Arts**                      %                      **64.20**                      **57.50**                       **AMBER**

This information is taken from the 2010 Active People Survey. The result although less than target is not statistically significantly less than the original result as the response rate to this survey was particularly low. It measures the percentage of the adult population in a local area that report they have engaged in the arts at least three times in the 12 months prior to the survey. The target is set as a 2% increase on the 2008 result (61.7%).

In the 2009 survey we ranked 2nd of the Unitary Authorities and 7th when compared to the London Boroughs.



# OVERVIEW AND SCRUTINY COMMISSION

## Agenda Item 46

Brighton & Hove City Council

**Subject:** Dual Diagnosis Scrutiny Review  
**Date of Meeting:** 1 November 2011  
**Report of:** Strategic Director Resources  
**Contact Officer:** Name: Giles Rossington Tel: 29-1038  
E-mail: Giles.rossington@brighton-hove.gov.uk  
**Wards Affected:** All

### FOR GENERAL RELEASE

#### 1. SUMMARY AND POLICY CONTEXT:

1.1 A scrutiny panel was set up to examine issues relating to city residents with a 'dual diagnosis' (i.e. people with co-existing severe and long-lasting mental health problems *and* significant substance misuse issues) this panel reported to the Health Overview & Scrutiny Commission (HOSC) on 21 April 2009.

1.2 Endorsed by HOSC the report was referred to the council's executive and considered at the 09 July 2009 Cabinet meeting. Cabinet endorsed all the report recommendations in principle, and referred to the city Working Age Mental Health (WAMH) Commissioning Strategy Group for detailed consideration. An interim implementation report was presented to the HOSC Scrutiny Review 20<sup>th</sup> July 2010.

1.3 A joint strategy for mental health, Transforming Mental Health Services 2010-2013, has been developed which supports a Dual Diagnosis care pathway review and recommends development of a specific Dual Diagnosis action plan to take forward.

1.4 Sussex Partnership Foundation Trust developed a Trust wide Dual Diagnosis strategy, launched autumn 2011. This is a five year plan with a principle aim of ensuring that Mental Health services assume primary responsibility for those with serious mental health issues and substance misuse needs. This strategy and associated action plan outlines how the Trust will work to improve support and further integrate care for people with a Dual Diagnosis.

1.5 The recent development of Clinical Commissioning, along with the appointment of a Substance Misuse Commissioner Post within Public Health, presents further opportunity to strengthen the whole system and partnership-wide approach to Dual Diagnosis. Development of a city wide, multi-agency action plan under the Transforming Community Mental Health services

strategy is currently under review. An update on progress to date is included in **Appendix 1** to this report. .

## **2. RECOMMENDATIONS:**

2.1 That members:

- (1) Note the contents of this report and its appendix;
- (2) Consider whether to request a further implementation update in twelve months' time.

## **3. BACKGROUND INFORMATION**

3.1 The term 'Dual Diagnosis' is typically used to refer to people who have a co-existing severe and long-lasting mental health problem coupled with significant substance misuse issues. For many, but not all, people with a dual diagnosis, this is likely to mean a diagnosis of schizophrenia/bi-polar disorder *plus* an addiction to opiates *plus* problematic use of a wide range of other drugs *and* alcohol.

3.2 People with a dual diagnosis are likely to be amongst the most vulnerable people in the local community. They are also likely to be amongst the most challenging. Many people with a dual diagnosis may well be homeless/rough sleepers. They are also very likely to be in regular contact with the justice system and to have physical health problems.

3.3 Treatment/support for both aspects of a dual diagnosis is typically complicated by the co-morbidity – e.g. abstinence programmes for substance misuse typically require a good deal of self awareness and self-discipline from users, but these are qualities which are often impaired by severe mental illness. This means that effective services for people with a dual diagnosis have to be designed with the condition in mind, and may have to be very specialised.

3.4 The Scrutiny panel made a series of recommendations – to the council's Housing Strategy department, to NHS Brighton & Hove, to the Sussex Partnership NHS Foundation Trust and to other partners. The reports recommendations were initially considered by the city Working Age Mental Health Commissioning Strategy working group, and subsequently the Transforming Mental Health Strategy Board as a city wide strategy was developed.

## **4. CONSULTATION**

4.1 This report has been compiled following request for information from agencies and partners.

## **5. FINANCIAL & OTHER IMPLICATIONS:**

### Financial Implications:

5.1 None to this report for information.

### Legal Implications:

5.2 None to this report

### Equalities Implications:

5.3 None to this report.

### Sustainability Implications:

5.4 None to this report.

### Crime & Disorder Implications:

5.5 None to this report.

### Risk and Opportunity Management Implications:

5.6 None to this report.

### Corporate / Citywide Implications:

5.7 None to this report.

## **SUPPORTING DOCUMENTATION**

### **Appendices:**

1. Dual Diagnosis Progress Report against HOSC Recommendations 2010
2. Sussex Partnership Foundation Trust Strategy for Dual Diagnosis 2011-2016

## Appendix 1

No.	Recommendation	Response
1.	<b>Supported Housing</b>	
a.	<p>Consideration should be given to the feasibility of commissioning temporary supported housing provision to be used to accommodate people with a dual diagnosis in between their discharge from residential psychiatric treatment and the allocation of appropriate longer term housing. Bed and Breakfast accommodation should only be considered as a last resort.</p>	<p>A Mental Health Accommodation Review Group (under the Transforming Mental Health Strategy work streams) is reviewing the Brighton and Hove Mental Health Accommodation pathway. The aim of which is to develop a holistic accommodation pathway, and an accommodation based solution for those with complex needs (including dual diagnosis) in the city. This will include consideration of the need for transitional/short term and longer term supported housing</p> <p>The Sussex Partnership Foundation Trust (SPFT) has secured SHA funding to take this work forward. A Development and Reviewing officer has been appointed to lead a 12 month project which will include a review of the barriers to move on for clients with complex needs (dual diagnosis) and to build a proposal for a tiered system of accommodation support.</p> <p>The project will undertake a review and reassessment of those people in out of area residential placements, and those who are delayed in acute in-patient services. The project will aim to increase providers understanding of the accommodation and support peoples needs of people with complex (dual diagnosis) needs, and to improve access to appropriate</p>



		<p>accommodation and support</p> <p>Supporting People will be joint funding the proposal for supported living services for people with complex needs to ensure that the focus is on promoting and maintaining independence</p> <p>The Brighton and Hove HOSC are receiving regular updates on the project</p>
b.	<p>Consideration should be given to the feasibility of commissioning a residential assessment facility to be used to house people with a suspected dual diagnosis for a period long enough to ensure a thorough assessment of their mental health and other needs.</p>	<p>The principal aim of Sussex Partnership Foundation Trusts' Dual Diagnosis strategy is to ensure that Mental Health services assume primary responsibility for those with a Dual Diagnosis, therefore the Dual Diagnosis focus is on ensuring effective joint working and care pathways.</p> <p>The Mill View detoxification service is located alongside the mainstream mental health service. The appointment of a Dual Diagnosis, Nurse Consultant will facilitate specialist and expert advice on Dual Diagnosis to SPFT staff and improve the responsiveness and appropriateness of assessment and treatment services in relation to Dual Diagnosis.</p> <p>A drug and alcohol assessment is included within acute mental health and risk assessment document. Within the Trusts Dual Diagnosis action plan a programme of staff training on dual diagnosis is planned to increase awareness and understanding, and to improve assessment and treatment delivery.</p>

c.	Consideration should be given to commissioning long term supported housing for people with a dual diagnosis who refuse treatment for their condition(s).	Consideration of the long term supported housing needs will be included within the Mental Health Accommodation Review as described above (1a)
d.	BHCC Housing Strategy and SPFT should seek to agree a protocol requiring statutory providers of mental health services to notify the council's Housing Strategy department when a client has been admitted to residential mental health care (subject to client's consent). This would enable the Housing Strategy department to assess the risk of an individual being unable to access suitable housing on their discharge from hospital and take appropriate action.	<p>To ensure housing needs are considered from the point of admission a Frequently Asked Questions was designed for acute services staff to help identify the correct pathways and options for individuals, this includes signposting to the SPFT Placement Officer at Bartholomew House</p> <p>The referral pathway from the acute mental health service to the Mental Health Placement officer is well established and following a recent review further improvements to the process have been implemented. Accommodation needs are logged on admission and passed to the Discharge Coordinator who facilitates the completion of Housing Options involvement. The service is well received and Dual Diagnosis is included within this pathway.</p> <p>The acute housing pathway for Dual Diagnosis will be further considered within the work of the Mental Health Accommodation Review Group.</p>

		A recent review of residential provision (Hanover House and Rutland Gardens) has resulted in a strengthened re-enablement model of care and improved move on outcomes for these services.
e.	Consideration to be given to establishing a 'dual diagnosis pathway' to ensure individuals can be appropriately housed as quickly and efficiently as possible.	The Dual Diagnosis pathway will be considered within the Tiered support proposal (Ref 1.a )Ref section 1.a
f.	The West Pier project represents an effective model for supported housing suitable for (some people) with a dual diagnosis. Serious consideration should be given to providing more such facilities in the city.	St Thomas Fund, run by the Crime Reduction Initiative, provides residential rehabilitation and treatment for people with dual diagnosis  Further need for Dual Diagnosis supported housing will be considered within the Tiered support proposal (Ref 1.a )
<b>2.</b>	<b>Women's Services</b>	
a.	Any future needs assessments must address the important issue of the potential under-representation of women, and must introduce measures to ameliorate this problem.	A needs assessment of women's issues will be included within the public health review of the MH /Dual Diagnosis JSNA review. Timescale to be confirmed
b.	Local solutions will be found to ensure that an appropriate range of services are available.	
<b>3.</b>	<b>Children and Young People</b>	

a.	The integrated services for dual diagnosis offered by the CYPT are studied by agencies responsible for co-working to provide adult dual diagnosis services. Where agencies are unable to formally integrate, or feel there would be no value in such a move, they should set out clearly how their services are to be effectively integrated on a less formal basis.	The Commissioning Team within the Children Services and SPFT are working together with the young people's substance misuse treatment team to ensure a streamlined and effective dual diagnosis service is provided. There is a move to more effective screening and recording of young people's substance misuse across community (tier 2) and clinical (tier 3) CAMHS. There is mental health representation within the RUOK? substance misuse service and the youth offending service promoting early identification of need. Staff within clinical CAMHS have been trained by RUOK in the identification of substance misuse issues.
b.	Serious and immediate consideration should be given to introducing a 'transitional' service for young people with a dual diagnosis (perhaps covering ages from 14-25). If it is not possible to introduce such a service locally, then service providers must demonstrate they have made the progression from children's to adults services as smooth as possible, preserving where feasible a high degree of continuity of care.	There is a transitional protocol in place within SPFT across child and adolescent (CAMHS) services and adult services. There is also a specific young people's service (14-25 years) with Teen to Adult Personal Advisors (TAPA) employed to work within the targeted youth support services across the city including a specialist post working with LGBT young people. The team supports young people who find it hard to access with CAMHS or adult services and can bridge the gap alongside them. A priority area identified as part of the Intelligent Commissioning pilot for alcohol is the development of a transitional service from RUOK?, for substance misuse up to the age of 25. Plans are in place this year to action this priority.
c.	Serious consideration needs to be given to the growing problem of problematic use of alcohol by children and young people (including those who have or are likely to develop a dual diagnosis). It is evident that better support and treatment services are required.	Various early identification methods have been put in place across the city with a clear remit for brief interventions. So now social care teams, integrated youth support services and hostels all screen young people regularly for drugs and alcohol use. A brief intervention service specifically attached to alcohol has been developed and operational working with 16 plus. A specialist alcohol post sits within RUOK? (the young people's substance misuse treatment service) and has put effective pathways in

		place with the Anti-social behaviour team and A & E. The young peoples treatment service has a CAMH's nurse who provides a specific package of care and within SPFT the revised care planning processes clearly identifies substance and alcohol use as part of their initial assessment.
d.	The development of a 'pathway' to encourage A&E staff to refer young people attending A&E with apparent substance or alcohol problems should be welcomed. There may need to be targets for referrals to ensure the pathway is used as efficiently as possible.	An effective care pathway is well established between the A& E team and RUOK?, the Young peoples substance misuse treatment service. More recently a pathway has been established between the ambulance service and RUOK?
e.	Public Health education encouraging abstinence/ sensible drug and alcohol use is vital to reducing the incidence of dual diagnosis in the long term. Effective funding for this service must be put in place. Public Health education encouraging mental wellness is equally important.	<p>The Public Health Team commissions a health promotion alcohol post and substance misuse post. One day a week is dedicated to young people. These posts are hosted by CRI and work alongside young people providing services to implement evidence based health promotion approach.</p> <p>The Healthy Schools Teams within the CYPT work across all schools to improve and develop the curriculum and thus raise young people's awareness and knowledge</p> <p>.</p>
f.	Dual diagnosis can have a profound and ongoing impact upon families of people with co-morbidity of mental health and substance misuse issues. It is vital that appropriate support services are available	The Common Assessment Framework (CAF) model seeks to ensure the needs of all members of a family are identified and a care plan developed Work has begun in this area with the introduction of workshops as part of parenting programmes raising the awareness of mental health and

	<p>for families and that every effort is taken to identify those in need of such support. Therefore, a protocol should be developed whereby a formal assessment of the support needs of families is undertaken whenever someone is diagnosed with a dual diagnosis.</p>	<p>substances. Most schools have counselling services available and CAMHS has family support workers within the community. Transition to Adult Personal Advisor (TAPA) workers intervene with both young people and their families. Social care teams have clear pathways into mental health and substance misuse treatment services where a dual care plan package would be available.</p> <p>Family CAF, Family Intervention Project and Functional Family therapy could be utilised to support families where the young person's dual diagnosis is having a significant impact on the family.</p> <p>Where a parent/carer has a dual diagnosis, adult services are encouraged to initiate a Family CAF and services are commissioned e.g. Oasis to support children and young people who are impacted upon by the needs of their parents.</p>
<b>4.</b>	<b>Integrated Working and Care Plans</b>	
a.	<p>Consideration should be given to adopting an integrated approach to the assessment of people with dual diagnosis problems. Such assessments must be outcome focussed.</p>	<p>All individuals will have their substance use assessed at referral within the comprehensive assessment process. This is part of the formal contract between the SPFT and NHS Brighton &amp; Hove. The Dual Diagnosis strategy includes clear reference to an integrated approach to service user assessment, care and treatment. The introduction of Health of the Nation Outcome Scores (HONOS) within assessment ensures an outcome-focussed approach.</p>

		Regular auditing of community and in patient teams assessments will ensure that drug and alcohol issues are discussed in line with Trust policy and the SPFT contract with the PCT.
b.	<p>A single integrated care plan may not be possible nor desirable, but co-working in devising, maintaining and using care plans is essential. Whilst good working has clearly been done in this area, a care plan with clearly expressed 'move on' plans, which can be accessed by housing support services (and other providers) is a necessary next step in the integration of support services for dual diagnosis.</p>	<p>Service users with a dual diagnosis have care plans that reflect the complexity of their needs and include reference to other services involved in the care with named people.</p> <p>Dual Diagnosis Champions Networks, involving key partners and stakeholders, are to be established in each locality. They aim to develop robust, sustainable relationships across care groups, and so strengthen a partnership approach to dual diagnosis.</p> <p>A review of the Primary and Secondary Care Map of Medicine referral pathways for dual diagnosis was commenced in Jan 2011. Dual Diagnosis will be integrated within the key Mental Health care pathways so ensuring partners have easy access to dual diagnosis information and referral pathway information and how substance misuse issues can be assessed and managed within each care pathway.</p> <p>SPFT service redesign programme "Under One Roof" will also further integrate service provision and reduce the amount of internal referrals between services</p>
<b>5.</b>	<b>Funding</b>	

a.	Better provision for alcohol related problems, both in terms of treatment and Public Health is a priority, and urgent consideration should be given by commissioners of health and social care of developing these services to meet local need.	<p>Existing Supporting People funded drug services have been remodelled to give equal priority to people whose primary need is alcohol related and Supporting People remain committed to ensuring that its detox and recovery services are accessible to people with dual diagnosis –</p> <p>Alcohol services have been expanded to include a brief interventions alcohol service. This is provided by the Crime Reductions Initiative (CRI) organisation at both A&amp;E and within primary care settings and works collaboratively with the statutory alcohol service providers as well as other health and social care agencies.</p>
b.	Commissioners must agree on a level (or levels) of care housing support appropriate for people with a dual diagnosis, and ensure there is sufficient funding available for city supported housing providers to deliver this level of care.	Commissioning plan will be agreed as part of the work outlined above ref 1a
<b>6.</b>	<b>Treatment and Support</b>	
a.	The provision of detoxification facilities for city residents be reconsidered, with a view to providing more timely access to these services, particularly in light of growing alcohol and drug dependency problems in Brighton & Hove.	Access issues were explored in a comprehensive review of Tier 4 services (in-patient detoxification and residential rehabilitation services) in Feb 2010. A key outcome of the review was maximising the detox beds at Mill View for Brighton & Hove drug and alcohol clients. Brighton & Hove has 5 beds at any one time and are now consistently achieving full



		<p>occupancy of these beds for Brighton &amp; Hove clients.</p> <p>The brief intervention services at A&amp;E for alcohol provided by Sussex Partnership NHS Foundation Trust are well established and provides brief assessment, advice and information. Year on year the performance of the service has improved and the service is on target to achieve full performance this year. Key to the success of this service is the joint partnership working between the Community Alcohol Team and the A&amp;E staff.</p>
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b.	Treatments need to be readily available at short notice, so the chance for effective intervention is not lost for clients who may not be consistently willing to present for treatment. Future needs assessments should focus on the accessibility as well as the provision of services.	The review considered wait times, particularly for alcohol clients. The waits are now reduced to within National Treatment Agency parameters and the numbers waiting has also reduced. There is now a weekly meeting with key people in the system to ensure that waits are minimised for alcohol clients.
c.	SPFT examines its policies relating to detaining people under a section of the Mental Health Act, in order to ensure the inevitably distressing experience of 'sectioning' people is as risk free as possible for patients (as well as families and carers), and that maximum possible therapeutic benefit is extracted from the process	Service Users are invited to describe their experience to the CQC at each monitoring visit. This is reported to the managers and the Mental Health Act Committee. Patients' rights and provision of information has been the subject of significant work in the past year and SPFT are monitoring progress against the National Patients Survey reports.
d.	Service users should be central to the development of dual diagnosis services. Commissioners should ensure that service providers take account of the views of service users when designing services and	Service users are identified members of and represented at the Brighton & Hove Dual Diagnosis Steering Group, which is chaired by the Dual Diagnosis Nurse Consultant. SPFT's dual diagnosis strategy is based on the DoH's "Developing a Capable Dual Diagnosis Strategy" which

	<p>training staff, and can demonstrate how these views have been incorporated into strategies, protocols, etc.</p>	<p>highlights the need for a service user-led outcomes framework.</p> <p>All Supporting People services are assessed against the Quality Assessment Framework which holds active service user involvement in strategic development as basic good practice expected from all providers.</p> <p>Ongoing service user consultation is conducted via quarterly live open forums, commissioned by the PCT and run by MIND. Forums offer open dialogue with commissioners re: peoples' experience of using services. These are user led, a broad range of mental health issues are discussed, and can include issues concerning dual diagnosis.</p>
<b>7.</b>	<b>Data Collection and Systems</b>	
a.	<p>A new strategic needs assessment for dual diagnosis services in Brighton &amp; Hove is undertaken as a matter of urgency.</p>	<p>A comprehensive strategic needs assessment of mental health was conducted in December 2007. This included specific sections on drug misuse, alcohol misuse and dual diagnosis.</p> <p>A needs assessment of drug and alcohol misuse and dual diagnosis will be taken forward within the review of the Mental Health JSNA. Timescale to be confirmed</p>





## The Dual Diagnosis Strategy

2011 - 2016



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## The Dual Diagnosis Strategy for Sussex Partnership NHS Foundation Trust

### Foreword

Dual diagnosis is a subject that has come up more and more frequently over recent years. In 2009 I included a specific question on dual diagnosis in my annual service user consultation, asking what the barriers were to accessing dual diagnosis treatment and support.

The feedback from service users and carers clearly outlined two main areas of need:

- Developing awareness, extending knowledge and increasing the skills which drug workers need to respond effectively to service users with a dual diagnosis.
- The targeting of vulnerable service user groups and the provision of appropriate treatment, services and support must be achieved through inter-agency collaboration across substance misuse, and mental health services both statutory and voluntary, and the criminal justice system.

Both of the above are vital when addressing the complex needs of dual diagnosis service users. The work done in Brighton and Hove in the residential rehabilitation services over the past year has benefitted numerous service users with a dual diagnosis and I have personally witnessed the positive effect that the Recovery Project (BHT) and St Thomas Fund (CRI) services have had on the lives of those concerned. There needs to continue to be a co-ordinated approach to commissioning mental health and substance misuse services to ensure that funding of treatment for people with co-existing conditions is adequate and secure.

Rick Cook,  
Service User Involvement Worker,  
Substance Misuse, Brighton and Hove



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## Executive Summary

The Sussex Partnership NHS Foundation Trust Dual Diagnosis Strategy provides a clear vision and framework to ensure a real improvement in the mental health and wellbeing of service users with a Dual Diagnosis who access the services delivered by the Trust. The strategy provides information and guidance for the Trust's health and social care partners and stakeholders to make certain that care, treatment and support for someone with a Dual Diagnosis is truly based on joint-working and is sustainable. It also gives clarity for key stakeholders of the work to be undertaken over the next five years in order to have Due Regard<sup>1</sup> for, and meet the needs of, people with a Dual Diagnosis.

The strategy has been developed with reference to national policy, research and evidence, including the Good Practice Guide (Department of Health (DH), 2002). These provide a key message that those with mental health (MH) problems and problematic drug and/or alcohol use should be cared for and treated by mainstream MH services working closely with substance misuse services (SMS) to ensure that care is comprehensive, co-ordinated and based on joint-working.

A representative group of service users, carers, partners, stakeholders, practitioners and managers have contributed to the development of the strategy.

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### 1. 'Due Regard':

Having due regard means that an organisation must consciously think about the three aims of the general equality duty as part of its decision making process. This means that consideration of equality issues must influence the decisions reached by public bodies in how they:

- Act as employers;
  - Develop, evaluate and review their policies;
  - Design, deliver and evaluate their services; and
  - Commission and procure services from others.
-



## Definition of terms used

Historically the term Dual Diagnosis generated as a diagnostic term, has been used to include a broad spectrum of mental health, alcohol and substance misuse problems that included the problematic use of alcohol, illicit and legal drugs, including over-the-counter and prescribed medication. A broad definition of Dual Diagnosis taken from the Dual Diagnosis Good Practice Guide states:

*'A primary psychiatric illness precipitating or leading to substance misuse, substance misuse worsening or altering the course of a psychiatric illness, intoxication and/or substance dependence leading to psychological symptoms or, substance misuse and/or withdrawal leading to psychiatric symptoms or illness.'* (DH 2002 p.7).

For the purpose of the Dual Diagnosis strategy the term 'co-existing mental health and substance misuse needs' will be used as a working definition interchangeably with Dual Diagnosis.

The term 'complex needs' will also be used to acknowledge the significance of physical, social and economic problems that inevitably affect the person thus recognizing the nature of the complexity between two or more existing needs.

Protected Characteristics, previously know as the 'Equality Strands' include the following: Age, Disability, Gender Re-assignment, Pregnancy and Maternity, Race, Religion and Belief (including no belief), Sex, Sexual Orientation.

## Introduction

The strategy focuses on a vision and general principles that should be adopted by all partners and stakeholders. The provision of care, treatment and support to those with co-existing mental health and substance misuse needs is a 'whole system' and multi-agency concern.

A set of key themes and outcomes (pg 10) that reflect the vision and general principles have been formulated into an action plan framework; a separate working document that will be reviewed and updated regularly through locality based Dual Diagnosis Strategy Implementation Groups and a Trust wide Dual Diagnosis Strategy Implementation Group. The action plan will be the means by which the impact of the strategy is monitored.

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The DH (2002) in 'Dual Diagnosis Good Practice' states that mental health services have a lead responsibility for those with serious mental health issues and substance misuse needs. 'Individuals with these dual problems deserve high quality service user focused integrated care. This must be delivered within MH services.' The document also states:

- The primary responsibility for those with severe mental health and problematic substance misuse should lie within the mental health service.
- For those with less severe mental health problems, mental health services should provide similar support to substance misuse services.
- Substance misuse teams should provide specialist support, consultancy and training to mental health teams.
- Clear pathways of joint-working and treatment should be developed.

The Dual Diagnosis strategy focuses on adults with complex needs who require clear, comprehensive, treatment and care based on joint-working between care groups and/or services. This focus aims to reduce the possibility of being moved from one service to another.

People who experience problems associated with mental health, problematic alcohol and/or drug use are at increased risk of a range of poor health outcomes which include: Serious and long term physical health problems, serious and long term mental health issues, self-harm and suicide.

Use of drugs and alcohol also increases the chance of unstable housing or homelessness, social isolation and stigma, disrupted family relationships, unemployment and imprisonment.

Service users who present with complex needs may have been excluded from some services and will require longer periods of engagement to connect with practitioners providing care, treatment and recovery programmes.

It is estimated that at least a third of people who access mental health services have a substance misuse problem and at least half of those who access substance misuse services have a mental health problem (Turning Point 2004). The occurrence of dual diagnosis varies across Sussex and within the different services, with higher percentages of substance and alcohol misuse being observed in those individuals requiring inpatient care, Assertive Outreach and Early Intervention Services and those who are LGB&T (Browne 2009).

Determining the prevalence of those with a co-existing mental health and substance misuse problems has been challenging. Historically, Trust audits of Community Mental Health Team (CMHT) caseloads and semi-structured interviews of practitioners and managers working in agencies in statutory and voluntary sectors suggested that Dual Diagnosis was more prevalent in those with more severe mental health problems, comparable with data available in the literature (9-20%). In relation to the stakeholder interviews an estimate of between 70-100% of problematic drug and/or alcohol use amongst the homeless was identified. In the SMS a prevalence of 40-90% of MH issues, for example, anxiety and depression were identified.

The complexity of problems can increase the risk of relapse and the involvement in the MH and SMS for extended periods of time. MH services and SMS are aware of the increased numbers of people accessing the services with co-existing mental health and substance misuse difficulties that occur at a younger age. Therefore early recognition and response through access to services, comprehensive assessments and a systematic approach to care and treatment is vital to reduce the likelihood of poor health outcomes. The ongoing needs of the service user will require staff and services to invest in long-term care that encapsulates Recovery principles implemented through the Recovery Orientated Community Kit (ROCK).

Service users with co-existing mental health and substance misuse needs are entitled to quality assessments, care and treatment at any point of access to MH services. It may also be provided by staff of different agencies or services working together to agree and implement an individual's assessment and care plan that should reflect the complexity of the service users needs and consider their protected characteristics particularly in relation to risk. Treatment and care should be co-ordinated between the different partners through a care co-ordinator in MH.

Learning from services that already provide a comprehensive service for people with co-existing mental health and substance misuse needs, for example, the Assertive Outreach Team (AOT), Early Interventions Services and the St. Thomas Fund (a trust partner) is vital. These three services provide examples of good practice that can be replicated across the trust and by other partners. Becca, a service user, encapsulates some of these points through her story of having a Dual Diagnosis in appendix 1.



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## Strategy Development

There have been a number of national policy drivers and guidelines produced (see appendix 2) to help services and practitioners address the requirements of those with co-existing mental health and substance misuse needs.

The Dual Diagnosis strategy has been developed to reflect other more recent strategic developments to include: Lord Darzi's NHS Next Stage Review (DH 2008) and New Horizons (DH 2009) emphasising the importance of preventative health care and well being in mental health; recovery, personalisation and social inclusion.

The process for developing the strategy included the following key steps:

- A literature review of current and relevant local and national strategic documents, research literature and policies that relate to Dual Diagnosis. These documents have informed the strategy and are listed in the bibliography.
- The formation of a Brighton and Hove Dual Diagnosis Steering Group (from January 2008); East Sussex Dual Diagnosis Steering Group (from October 2011) and West Sussex from the end of 2011. The membership includes carers and service users, social and health partners, trust staff and representation from the PCT; the formation of the Trust Dual Diagnosis Steering Group whose membership includes medical staff and senior managers from the trust (from 2009).
- The hosting of a Dual Diagnosis Strategy Development Day (February 2010). Attendees included service users and representatives, health and social care partners (for example GPs, SMS, local prison service and PCT representatives).
- A response to the Brighton and Hove Scrutiny Committee's Dual Diagnosis Review 2008.

## Strategy Implementation

The Dual Diagnosis strategy is unequivocal in confirming that MH services lead on ensuring the right types of services are provided for service users. People with a Dual Diagnosis can expect a comprehensive assessment that has due regard for their needs, considers their protected characteristics, involves them in choosing the type of care provided and in designing the care plan with a named care coordinator. In addition they will be assisted to access and utilise the full range of health and social care services which will include amongst others; primary health care, housing, employment services as well as SMS.

Our new service redesign Under One Roof provides a revised community mental health services model. This includes assessment and treatment centres with access to highly specialised multi agency practitioners who provide specialist assessment and formulation working with service users and carers and bespoke treatment and care packages. There will be Integrated Care Management Teams based in local communities that bring together health and social care practitioners to support and enable individuals to optimise their wellbeing and recovery. The key to the success of these services is the degree to which they are integrated into the local community and working alongside partner agencies, particularly when meeting the needs of the Dual Diagnosis service users.

*“...that all services work together, communicate with each other, share information, to help and support the service user.” - Becca, Service User.*

It is important to acknowledge the usefulness of harm reduction strategies to reduce risk; a model for engagement and rapport building when drug and/or alcohol reduction or abstinence is not viewed by the service user as important and/or a priority. However, the use of

harm reduction interventions can help towards ensuring that someone stays in contact with the MH services or SMS and their drug and alcohol use is as stable as possible for them. This model is familiar to the SMS and is included in the dual diagnosis essential training.

It is acknowledged that for some teams and practitioners the interventions they are providing for service users with co-existing mental health and substance misuse problems are appropriate and affective. Practitioners will also be accessing continuing professional development to enhance their knowledge and skills.

Service users with co-existing MH problems and SM needs have improved care and treatment outcomes when MH and SM workers are provided with appropriate knowledge and skills training which is evidence-based and informed by the values of Recovery. This will be further enhanced by a clinical supervision, training event and peer support framework for Dual Diagnosis champions.

The trust already offers training and education in line with national Dual Diagnosis guidelines and initiatives (Hughes, 2006) which will continue. A range of Dual Diagnosis related training is available to all MH and SM staff and is included in the trust's training plan. A staff data base of those who have received essential training in Dual Diagnosis has been established and is monitored by the staff training department.

A data base of Dual Diagnosis trainers and champions will be established and monitored as part of the development of a skilled and competent workforce.

*“...that all workers have a greater awareness and knowledge of dual diagnosis... (and the) service user is assigned a key worker with mental health and substance misuse experience.” - Becca, Service User.*



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## Key Themes and Outcomes

The key themes and outcomes have been formulated into objectives provided in an action plan for the five year strategy implementation period.

### Key Theme 1

#### - Accessing the required service

- Outcome 1a) Improve access to services for the person who presents with a dual diagnosis

### Key Theme 2

#### - Assessment, Care and Treatment

- Outcome 2a) Provide holistic assessment and Recovery care planning at the first point of contact that acknowledges the persons dual diagnosis.
- Outcome 2b) Acknowledge dual diagnosis service users face challenges that can lead to relapses and therefore require ongoing, long term engagement based on therapeutic optimism with an emphasis on harm reduction strategies, Motivational Interviewing, relapse prevention and recovery principles reflected in the care pathway.

## **Key Theme 3 - Establishing strong health and social care partnerships and robust dual diagnosis clinical care pathways compatible with other established care pathways.**

- Outcome 3a) Recognise the importance of valuing health and social care partnerships with other services in order to ensure the provision of joint working for dual diagnosis service users
- Outcome 3b) Establish robust dual diagnosis clinical care pathways to support, treat and care for people with co-existing needs (based on the dual diagnosis policy and Dual Diagnosis clinical care pathways).
- Outcome 3c) Provide further developed links with, and support to, housing and supported accommodation agencies, considering those in seldom heard communities. Acknowledging the complexity and changing needs relating to the persons drug use and mental health.

## **Key Theme 4 - Include the service user and carer in decisions about assessment, care, treatment and service provision**

- Outcome 4a) Ensure service users are included in decisions about their care and treatment. Carers and family members, with the service user's permission will be included in care planning and decisions about care and treatment. Dual Diagnosis issues and challenges should be captured in the carer's assessment.
- Outcome 4b) Provide improved and accessible 'real time' information on a wide range of services that will offer support to Dual Diagnosis service users and their carers.
- Outcome 4c) Ensure family members and carers are provide with the opportunity to be involved in steering groups, reviews, audits, evaluations and research to help influence the development and improvement of services for those individuals with a Dual Diagnosis.

## **Key Theme - 5 Training and Education of the workforce**

- Outcome 5a) Provide dedicated dual diagnosis champions in each team across the care groups who have attended the Dual Diagnosis essential training.
- Outcome 5b) Ensure mental health and substance misuse workers have the knowledge, skills and confidence to provide assessment, care and treatment for people with a Dual Diagnosis.
- Outcome 5c) Provide appropriate coordinated care that utilises the skills from MH and SMS workers. Ensuring joint assessments, co-working and the facilitation of the care pathways to give the best service for the person with a Dual Diagnosis.

## **Key Theme 6 - Research and Development**

- Outcome 6a) Ensure dual diagnosis is addressed through the Trust's research and development agenda and through links with local universities research teams which should include a particular focus on women and Dual Diagnosis.

## **Key Theme 7 - Knowing the dual diagnosis population**

- Outcome 7a) Capture, report and analyse Dual Diagnosis activity data to inform current and future Dual Diagnosis health and social health care provision, training and education requirements.
- Outcome 7b) Clarify the extent of the population across the protected characteristics of those with a Dual Diagnosis accessing the service to help effectively implement and audit the key priorities and directions identified in the strategy. These should be reviewed regularly with agreed time scales. The information will help the trust maximise effective care provision for Dual Diagnosis service users and assist in assessing future needs.

## Evaluation and Research

It is vital that the identified key outcomes developed from the strategy are measurable and service user focused.

Monitoring will take place through the action plan and allocation of responsibility to individual professional leads, teams and groups. Robust evaluation processes are already in place for the Dual Diagnosis training and education study days. This data is collated and retained on a database. The Trust will be using health outcomes to evaluate the effectiveness of local services alongside opportunities to explore qualitative experiences through audit and surveys.

Specific clinical aspects of care and treatment provision will be audited and clearly identified in the action plan. For example, the use of FAST (Fast Alcohol Screening Test), AUDIT (The Alcohol Use Disorders Identification Test), Motivational Interviewing strategies and care planning that acknowledge drug and alcohol misuse. The role of the Dual Diagnosis champion will be audited and evaluated.

There is a need to continually review current evidence in the area of Dual Diagnosis in order to develop new knowledge and improve the experience of the Dual Diagnosis service user and carer.

The Research and Development Team for the trust has established substance misuse as a research theme. Dual Diagnosis specific areas for research have been identified and are being developed.

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## Conclusion

Effective care, treatment and support for service users with a Dual Diagnosis can only be available through collaboration and partnership working between MH, SM and social and health care service providers.

Care, treatment and support provided concurrently with clear communication, an understanding of roles and information sharing will result in improved service user engagement, health and social care outcomes.

Implementation of the Dual Diagnosis Strategy will provide staff working in the trust with the opportunity to enhance their knowledge, skills and confidence to deliver effective Dual Diagnosis interventions so ensuring that those with a Dual Diagnosis have their MH and substance misuse needs met.

## Acknowledgements

The trust would like to convey its appreciation to all those who have contributed to the Dual Diagnosis strategy development and consultation process. The support and guidance from service users, PCT and Trust colleagues has helped to create a strategy that will make a real difference to people with a Dual Diagnosis. In particular we would like to express our thanks to the members of the Brighton and Hove Dual Diagnosis Steering Group, the Trust Wide Dual Diagnosis Steering Group, NHS Brighton and Hove, and the attendees at the Dual Diagnosis Strategy Development Day who gave their time and support and gave feedback on the strategy development process which has helped drive the strategy forward.



## Appendix 1

### A personal experience of having a Dual Diagnosis - by Becca.

For many years I felt lost and trapped in my mind, not knowing what was wrong with me. Having had a diagnosis of clinical depression through mental health services, yet still having addiction problems and not being able to stop using illicit and prescription drugs. Being sent away by mental health services, when I had told them about my drug use. Left in the community with a small child with no help and support for mental health issues. Being told that until I was clean I could get no help! My drug use spiralled out of control, as with no help and support I couldn't stop and also without help and support my drug use was self prescribing to numb myself and to shut my mind up! This was a dark and scary time.

Eventually after many years I was recognised as having a dual diagnosis and a local rehab was willing to help me. For the first time the rehab was willing to accept a service user that wanted to stop using illicit drugs and that was allowed to carry on taking anti-depressants for mental illness. This was on May 1st 2009 the first time that I had ever had the correct help and support that I needed. My doctor now recognises I have a dual diagnosis and can treat me properly and advise me correctly. Having now stopped using illicit drugs and alcohol for 19 months I am aware that I have a mental illness and it is not induced by illicit drugs.... I am aware that my use of illicit drugs did not help my condition, it made it worse.

The good thing is now I am able to live my life without numbing myself and free from the obsession of active addiction. Now that my mental illness is being managed correctly, most days my life is good... and I hardly ever think about using. As an addict sometimes those thoughts are there, today though I don't act on those thoughts.

I do have down days, and sometimes, I can feel lost or overwhelmed with sadness, today though I have a good support network of friends around me that can help and I can talk to. Today I also know that these down days will not last and these feelings will pass.

### Key people, support and liaison

1. Initial assessment 11 St. Georges Place, Brighton - was not turned away.
2. Assessment with doctors at SMS Vantage Point - Dual Diagnosis recognised.
3. Assessment The Recovery Project - Dual Diagnosis recognised.
4. The Recovery Project - 9 months rehab, having keyworker with mental health/addiction experience.
5. Doctor, Preston Park surgery, supporting me in community.
6. Threshold Women's Counselling Services for mental health. 12 weeks counselling.
7. Narcotics Anonymous meetings in Brighton.

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## Appendix 2

### National policy development and drivers - an overview

**1. The dual diagnosis good practice guide (2002)** highlights that drug and/or alcohol problems are 'usual rather than exceptional' among people with severe MH problems. The guidance focuses on people with severe mental health problems and problematic substance misuse. There are 5 key features of the good practice guide which have informed the strategy:

- Service users should be part of main stream MH services and services should be developed to avoid service users falling between 'gaps in services' (DH 2002) and being moved from one service to another. Integrated care should be provided within MH services and advised and supported by substance misuse specialists.
- Definitions of Dual Diagnosis should be agreed to reflect local patterns of need and target groups.
- Training and support should be provided for MH workers across the different services.
- All services, including drug and alcohol services must ensure that Dual Diagnosis service users with severe MH problems are subject to CPA and a full risk assessment.
- The provision of an integrated service model for Dual Diagnosis service users to ensure that their needs are met effectively.

**2. Dual diagnosis in mental health inpatient and day hospital settings (2006)** provided guidance that focused on service users with a primary diagnosis of mental illness who also have problems with substance misuse.' It also provided guidance on the assessment and management of people with a Dual Diagnosis.

The main points raised that have been considered in the strategy are:

- Acknowledging that there are two groups of service users: those with a Dual Diagnosis and those without a diagnosis of substance misuse, whose substance misuse may worsen their MH, impede treatment and recovery. The guidance also highlights the importance of training for staff which has been considered and included as part of this strategy.

**3. Closing the gap (2006).** The capability framework identifies core competencies for working with people with a Dual Diagnosis. Some of the core elements of the framework have informed the Dual Diagnosis training.

#### **4. Turning Point - Dual Diagnosis - Good Practice Handbook (2007).**

The guide advocates:

- The 'availability of empathic, hopeful relationships that provide integrated and co-ordinated services.'
- 'Connect with service users who are often vulnerable, chaotic and to poorly motivated to receive help.'
- Recognising the use of Motivational Interviewing and CBT approaches.
- Acknowledging 'supporting people with a Dual Diagnosis and their families is a long and slow process and continued engagement is essential.
- Recognising outreach approaches to enable the continuation of contact with services when attending appointments may be difficult for service users.

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## Contact

Trust Headquarters,  
Sussex Partnership NHS Foundation Trust  
Trust Headquarters, Swandean,  
Arundel Road, Worthing,  
West Sussex BN13 3EP

Main switchboard: 01903 843000  
Web: [www.sussexpartnership.nhs.uk](http://www.sussexpartnership.nhs.uk)  
Email: [info@sussexpartnership.nhs.uk](mailto:info@sussexpartnership.nhs.uk)

Support our work by becoming  
a member of Sussex Partnership.  
For details freephone: 0800 0153357  
or email: [ft@sussexpartnership.nhs.uk](mailto:ft@sussexpartnership.nhs.uk)

Membership Office  
FREEPOST SEA14137 (no stamp required)  
Sussex Partnership NHS Foundation Trust  
Trust Headquarters, Worthing BN13 3BP,

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(Text Relay calls welcome)**

Overview and Scrutiny Commission Draft Work Plan 2011 - 2012

Issue	Overview & Scrutiny Activity	Outcome & Monitoring/Dates
<b>19 July 2011</b>		
Invitation to Council Leader and Cabinet Member for Central Services, Councillors Randall and Kitcat	Joint working between Scrutiny and the Executive	Benefits for the City of joint working between Scrutiny and Executive
Strategic Use of Land – request for scrutiny	To determine whether scrutiny action is needed	Report asked for, to next meeting
Targeted Budget Management (TBM)	Scrutiny monitoring of the Budget	Replies requested on waste collection rounds and the Local Delivery Vehicle
TBM 2011-2012 Month 2	Scrutiny monitoring of the Budget	As above
Budget Process and Scrutiny of the Budget	Agreement on the Budget process & scrutiny's involvement	A Budget Scrutiny panel to be established
Community Engagement Framework - including request for scrutiny	Scrutiny monitoring of community engagement. Determining scrutiny request re consultations on planning	Draft Statement of Community Involvement to a future meeting
Monitoring Climate Change Adaptation Scrutiny Recommendations	Tracking action following scrutiny recommendations	Further tracking report to a future meeting

Update from recent meetings, including report from ECSOSC Chair	Coordination of Scrutiny	Agreed that ECSOSC consider Strategic Plans from a Community Safety point of view	
OSC draft work plan	To agree work plan	Agreed	
<b>13 September 2011</b>			
Strategic Land Use	Report addressing request for scrutiny	Replies to comments provided. Employment section of City Plan to be brought to 1 November OSC.	
Consultation on Proposed Merger Of East and West Sussex Fire and Rescue Service	Scrutiny input to be taken forward to Cabinet	22 September Cabinet taking OSC comments into account.	
Update from recent meetings, including report from Chair of ASCHOSC	Coordination of Scrutiny	Noted.	
<b>1 November 2011</b>			
City Plan – Consultation on Policy Options (Employment)	As requested by OSC		

Annual Complaints Report	As requested by OSC	
Final LAA report	Scrutiny performance monitoring	
Dual Diagnosis Update	Monitoring outcomes of scrutiny reviews	
Update from Chair of CTEOSC	Coordination of Scrutiny function	

**13 December 2011**

People Strategy		
Intelligent Commissioning		
City Performance Plan		
Organisational Health Report		
Update from recent meetings, including report from Chair of CYPOSC		

**31 January 2012**

Scrutiny of Budget Proposals			
Climate Change Adaptation; Monitoring scrutiny outcomes			
Update from recent meetings, including report from Chair of HOSC			

**27 March 2012**

Community Engagement Framework monitoring			
ICT Strategy			
Council's Property Portfolio			



Agenda Item 48  
 Consultation: scrutiny topics

Overarching theme	Q1 - What topic, decision or policy would you like to be investigated by a Scrutiny Panel? Please give details below.
Alcohol	Late night opening of pubs and other licenced premises in residential areas.
Alcohol	Increase in violence on our streets mainly due to excessive alcohol and drugs
Alcohol	Issues relating to alcohol issues including health concerns, licensing, community safety
Alcohol	Anti social behaviour. Particular in relation to 'late night economy'.
Children	What services are provided for the transitional age group in Brighton and Hove i.e. the 10-12 year age group. BHCC secured money around 3250K for work with this group over a year ago, after many local volunteers and others have been asking for an increase in these services to aid work with youth and to help those young people who need extra help when moving from a child to a young person.
Children	Access to universities, Making the university fees and entry system fairer
Children	improving access, affordability and availability of services for young people
Children	increasing positive engagement between police and younger people
Children	Setting up home allowances for children in care (CIC)
Children	Free access to leisure services and free bus travel for teenagers
Children	Corporate Parenting of children in care (CIC)
Children	Monitoring and reviewing council's services for looked after children
Children	Informing and consulting Children in Care (CIC)
Children	Transitions for children with disabilities; employment, transitions and how to be more independent
Children	University and accommodation fees paid for care leavers
Children	Managing the transition from junior to secondary schools in the city
Citizenship	Increasing the rates of voting and encouraging younger people to vote/first time voters
Community Engagement	LATS
Council strategy	Employment and taking staff from redeployment pools rather than getting the best external candidates.
Council strategy	How far the council is supporting the city Volunteering Strategy and how far it is embedded in council services.
Council strategy	The operation of scrutiny itself within BHCC. For example the inexcusable failure to date to allocate every item on the Forward Plan to the relevant Scrutiny Ctee for EXPLICIT consideration undermines control over the Leader & Cabinet system. Also the dropping of the previous involvement of attending stakeholders at Scrutiny Ctees (e.g. the formula of Cllrs Tonks, Edmond-Smith, and Watkins (perhaps others too) of "Before we go to the vote does any member of the public have any contribution to offer?"). Need much better follow-up of implementation of previous Scrutiny Panel recommendations, potentially over a period of 5 years or more. Need to review to what extent Quantity has been allowed to overtake Quality in the work of Scrutiny Panels. Have never seen a Panel that gathered too much evidence, but plenty that failed to harvest enough, and particularly many where too little desktop-analysis took place afterwards to address conflicts and gaps in evidence from various sources. Panels, with some laudable exceptions, are also under-performing by failing to provide for members of the audience to question the witnesses directly.
Council strategy	Look at the performance of public sector asset holdings to see how well they are performing

Agenda Item 48  
 Consultation: scrutiny topics

Council strategy	Future of scrutiny under a committee system
Council strategy	Intelligent Commissioning
Culture	Securing funding for cultural activities from private benefactors
Employment	Apprenticeships and work opportunities for young people
Employment	Using the skills of residents or employing people from outside the city
Equalities	How the city responds to the needs of our large LGBT communities. At present, unlike BME communities, we have no resource centre and only marginally funded community and voluntary sector organisations. You would think that when the Director of Public Health devotes an entire chapter to our LGBT populations in his annual report, there would be more investing in looking after us?
Equalities	I would like to see support and consultation with the Lesbian, Gay, Bisexual and Trans community, including funding decisions.
Equalities	The extent to which food poverty is an issue in Brighton & Hove and what is being done to reduce the number of people experiencing food poverty.
Health	Exercise for older people
Health	Factors which improve well-being of older people
Health	Dyslexia - diagnosis and beyond
Housing	Housing & decent homes standard
Housing	housing, housing support
Housing	Damage done to squatted properties
Housing	Communal areas on council estates: number of such areas in the North Portside ward that are falling into decay
Litter	Dog fouling - Brighton has become the dog excrement city of the UK - our streets are covered in dog excrement. It is disgusting. I have to remove dog shit from outside my house at least 2 or 3 times per week. Despite raising this issue with the council and the police on numerous occasions, the council do nothing and this anti social behaviour gets worst. The Tory led council were ineffective around these issues. Let's see what the Greens can do. Also street littering, cigarette butts and chewing gum, and fly tipping. Clean Brighton up!!!!!! People need to be encouraged to keep the city clean. If they don't introduce punitive measures - enforce community orders - make them clean the streets with City Clean workers or fine them.
Litter	the amount of dirt and litter on our streets 6 increase in violence on our streets mainly due to excessive alcohol and drugs
Major Projects	Unkempt and/or derelict sites and buildings: unauthorised graffiti and tagging
Parks	behaviour and safety in parks throughout the city need for park wardens to be present in parks regarding antisocial behaviour
Planning	Street clutter - signing, guardrails etc. Not just in the city centre but throughout the whole of B&H.
Planning	the archaic planning policies stifling progressive contemporary design in favour of mediocra bland developments that will blight the city for years.
Sport and Leisure	Saltdean Lido

Agenda Item 48  
 Consultation: scrutiny topics

Studentification	The impact (positive and negative) that students have on the residents of this city
Sustainability	Energy saving
Sustainability	community owned electricity generator. - Renewable only.
Sustainability	Progress towards an urban biosphere
Transport	Making (particularly) residential pavements easier to walk on. I get a lot of pain in my feet and ankles so no doubt notice it more than most - pavements are cut with ramps for garages, uneven slabs, poor tarmac repairs and with uncomfortable sideways slopes.
Third Sector	Supporting voluntary groups & charities to strengthen their governance. Encourage greater involvement with arts commissioning in city.
Third Sector	support from the Council to third sector to enable them to compete
Third Sector	Impact of funding provided through Council grants
Transport	Transport
Transport	Traffic levels & safety and how we can improve public transport in Brighton & Hove.
Transport	Car parking on pavements
Transport	The cost of bus services in the city.
Transport	Traffic - parking charges are high but visitors have little in the way of options. A good park and ride scheme needs to be introduced and city centre parking reserved for those working or living in the city. Congestion charging will penalise city businesses which will be disastrous in the current economic climate.
Transport	Parking and displacement in parking caused by the parking schemes adopted throughout the city.
Transport	The traffic situation in Brighton and Hove
Transport	I'd like the reduction of traffic in the town to be investigated, with a view to finding ways to make a substantial reduction.
Transport	Pedestrianisation of the city centre to ameliorate traffic congestion.
Transport	Traffic congestion.
Transport	The provision, implementation and monitoring of provisions for cyclist across the city. Including providing and policing safe and sensible cycle lanes as well as adequate numbers of bike racks in sensible locations,
Transport	public transport for the city. would love to see a tram feasibility study a seafront monorail and/or high speed rail link to London
Transport	Traffic. I would like to see more pedestrianized areas in the city. The North Laines is an obvious area plus the city centre.
Transport	New Road works very well with pedestrians plus 'slow' traffic; maybe this experiment should be extended to other areas.
Transport	Slowing down the traffic to a really slow speed might be another option.
Transport	On-street parking charges apply across virtually the whole of central Brighton & Hove (and beyond) on a Sunday. How much is this to the detriment of the local economy?
Transport	the condition of our roads and pavements
Transport	lack of good planting on our main roads
Transport	congestion due to ridiculous and dangerous new road layouts
Transport	High levels of vehicle pollution being generated in key areas of the city

Agenda Item 48  
 Consultation: scrutiny topics

Transport	Arriva are logging details of bus travel and personal details (pass number of the elderly)
Transport	residents concerns that there are cuts to the Brighton & Hove bus services including possible discontinuing Senior citizens passes
Transport	potential misuse of the disabled parking (Blue Badge) scheme
Transport	Signposting of Clifton Place
Transport	Traffic congestion, parking signs enforcement, cyclists and scooters
Transport	the possibility of introducing an intelligent park and ride scheme and making the city centre pedestrian friendly
Transport	Parking shortage in the city and encouraging other forms of transport
Transport	increasing the number of buses in the summer subsidised by language schools due to the 9,000 students
Transport	Removing these expensive bike counters dotted across the city
Transport	costly buses and lack of affordable parking
Travellers	Travellers.
Travellers	illegal Traveller sites and whether they pay Council Tax for services and amenities
Travellers	Unauthorised traveller encampments in the city
Travellers	Traveller provision.
Travellers	Van dwellers and travellers policy
Travellers	illegal encampments and incidences of harrasment to local residents
Travellers	Provision for Gypsy Roma Traveller groups within our city. Health/education/homes etc. What outreach work is there and how is it carried
Waste management	Rubbish collection and street cleaning on the Upper Lewes Road and adjacent roads into the Lewes Road Triangle.
Waste management	recycling (more regular collections), waste management improvements, noise (neighbours)
Waste management	Safe disposal of this waste
Waste management	Material collections
Waste management	increasing recycling rates and managing communal bins