

Draft housing strategy 2024 to 2029 Consultation report



**Brighton & Hove
City Council**

1. Introduction

This report summarises findings from the public consultation on *Homes for everyone – draft housing strategy for consultation*. The consultation focused on the five proposed priorities and areas for action in the draft strategy.

The proposed priorities are as follows:

1. improve housing quality, safety and sustainability
2. deliver the homes our city needs
3. prevent homelessness and meet housing need
4. support independence and improved health and wellbeing for all
5. provide resident focused housing services

The consultation ran for 11 weeks from 18 March to 2 June 2024.¹ When the consultation closed, we had received 347 responses. Of these, 294 were from individuals, including 265 from residents of the city. 53 responses were received on behalf of groups, networks and organisations. Most were submitted online through Your Voice, the council's consultation platform. A small number of responses were sent by email or post.

We received many detailed responses and have therefore grouped feedback into themes. Section 2 summarises key themes and issues arising from the consultation.² These reflect the views and opinions of those who responded to the consultation and do not represent the position or policies of the council. Whilst there was broad support for the proposed priorities and areas for action, there were different, sometimes conflicting, views on how the council should take them forward. Respondents also highlighted gaps and areas where they thought the strategy could be improved. We are not able to respond here to every point made, but we will share the detailed feedback with relevant council officers and use this information to inform our action and service planning.

Section 2 also sets out the council's response to the feedback themes and identifies how we plan to take forward key issues. Action arising from feedback is likely to include one or more of the following: amendments to the strategy itself; inclusion of more detail on deliverables and targets in an accompanying action plan; feedback on work already underway; and discussion with elected members of the council on issues where the council does not have the power or the resources to act, but where it may wish to lobby central government for those powers or resources to be granted.

¹ At the request of members of the Learning Disability Partnership, the original closing date of 19 May was extended to give more time to consult with people with a learning disability.

² Thematic analysis was undertaken with the support of the Your Voice artificial intelligence (AI) feature. The AI analysis was moderated by two members of the housing strategy project group, with the themes reviewed and discussed by the full project group.

Section 3 outlines the consultation process.

2. Key themes in the consultation

Priority 1 Improve quality, safety and sustainability

1.1 Improve the quality of council homes and estates

1.2 Prioritise building and fire safety improvements

1.3 Improve standards in the private rented sector

1.4 Improve sustainability and energy efficiency

Support for proposed priority

Amongst those who responded to this question (319/347) there were high levels of support for the proposed priority (82.1% agree or strongly agree; 4.3% disagree or strongly disagree). There were similar levels of support for the four proposed areas for focused action.

Theme: Quality and standards in council housing

Several respondents expressed concern about the poor quality of all types of rented housing particularly in relation to damp, mould and sound insulation. There were calls for more stringent standards and enforcement of those standards across both social and private rented housing. Concerns about the safety of council homes were raised, with suggestions for improvements including better maintenance. The council was encouraged to go beyond the regulatory requirements.

Initial response

The council takes its responsibilities as a landlord seriously. We will prioritise work to improve the quality of our own housing stock, with a focus on building and fire safety improvements to ensure that we meet legal and regulatory requirements. Where resources permit, we will seek to go beyond these requirements.

The draft strategy acknowledges historic underinvestment in our properties. Some of our homes need refurbishment, others may need renewal in the longer term. The draft strategy commits us to a housing asset management programme which will ensure we better understand the condition of our homes and inform investment in planned and major works. We aim to shift from a reactive to proactive approach to repair, maintenance and renewal.

From 1 April 2024, all social landlords, including the council, are subject to a new and challenging regulatory regime with an expectation of full compliance with the outcomes and expectations set out in the Regulator of Social Housing's Consumer Standards. This new regulatory regime is intended to hold social landlords to account and ensure that all socially rented homes are decent, safe and well-maintained and that tenants receive quality landlord services and are treated with fairness and respect. The draft strategy sets out at a high level, how we will meet and maintain these standards. Detailed plans for each of the consumer standards sit

behind the priorities as outlined in the strategy. We will work with other social landlords to share information and best practice and to drive-up standards across the social rented sector in the city.

Our approach to standards in the private rented sector is set out in the next section.

Theme: Standards in the private rented sector

How the council supports improvement in the private rented sector was a key issue for many respondents. Suggestions include introducing more HMO licenses and better regulation of landlords, including calls to challenge discrimination by private landlords against people on benefits and groups such as single parents, people with learning disabilities and people from Black and racially minoritised groups. There are calls for the council to do more to support private sector renters. Others want the council to be tougher on rogue landlords. Some respondents suggested the council should work proactively with landlords and landlord network organisations to improve standards. Some expressed concern about the impact of greater regulation on the private rented sector, including landlords selling up or raising rents to cover their extra costs.

Initial response

The draft strategy sets out our approach to improving standards. We believe that this balances the need to protect tenants with the need to ensure that responsible landlords can continue to operate in the city. Within the legislative framework available to us, we will set local standards and enforce legal requirements. We have set a clear pathway for licensing in the city with the introduction of a new Additional Licensing Scheme for smaller HMO's and a Selective Licensing Scheme in 4 wards in the city. The council's intention is to apply to the Secretary of State for a wider selective licensing scheme in 2025.

With over a third of our residents renting privately we recognise the key role of private sector landlords in providing an important source of accommodation. We will work with landlords and their networks to ensure that they understand their responsibilities, are able to share and access good practice guidance and are kept up to date with relevant changes in national legislation and local requirements. In addition, where grant funding is available, we will ensure this information is shared with renters and landlords to help improve conditions in their homes.

We remain committed to identifying and tackling rogue landlords using all the powers at our disposal. Following the announcement of a Renters' Rights Bill in the King's Speech we prepare for the anticipated changes in legislation.

Theme: Energy efficiency and sustainability

Improving insulation and energy efficiency in older housing stock was a recurring theme amongst responses. Some suggested tax breaks or grants for energy efficiency measures and the integration of renewable energy sources in new developments and refurbishment programmes. Some respondents suggest that the strategy should have a greater focus on sustainable development and environmental standards.

Initial response

The council must work within the scope of its powers and resources and the nature of the housing stock that we have in the city, for example, its age and quality. Whilst we support measures to improve energy efficiency through the tax system, this change would need to be implemented at a national level. In some areas, we must balance competing priorities, for example, fire safety and sustainability. In these instances, we will prioritise our statutory duties.

The age of our own housing stock means that improving the energy performance of council homes is a priority for us. We have an ongoing programme to install solar PV panels, decarbonise communal heating systems, insulate and replace doors, windows and roofing to improve energy efficiency. This will reduce costs for our tenants and contribute to meeting net zero targets. As set out in the draft strategy, we are working to support owners of private property to access grants to improve the energy efficiency of their properties. In the coming year we will update our plan to tackle fuel poverty and increase access to affordable warmth.

The council is committed to the delivery of the Future Homes Standard to make new homes more energy efficient and low carbon by 2025. The refresh of the City Plan Part 1 beginning later this year, gives us the opportunity to review whether we should seek to go further than the national standard.

Priority 2 Deliver the homes our city needs

2.1 Increase the supply of high-quality homes that meet the needs of our communities

2.2 Increase the supply of affordable homes

2.3 Create places where people are proud to live

Support for proposed priority

Amongst those who responded to this question (307/347) there were high levels of support for the proposed priority (78.4% agree or strongly agree; 3.4% disagree or strongly disagree). There were similar levels of support for the three proposed areas for focused action.

Theme: Need for a range of housing options

Several respondents wanted more specific housing types to be available in the city, including single-person accommodation, family homes, and specialist housing. There were also calls for more social rented homes and downsizer housing. Several respondents acknowledged how challenging delivering more housing at pace is for a city with high land prices and limited sites for large scale development. Suggestions to address this include building medium to high-density housing, building on the urban fringe, greater use of brownfield sites, self-build, modular and 'flatpack' housing. Others suggested repurposing existing buildings, including empty properties and office spaces to alleviate housing shortages rather than focusing on new construction. Some called for better use of council owned land and assets for

development. Several respondents stressed the importance of good quality design, including calls for a design code to set expected standards.

Initial response

We recognise that the draft housing strategy did not clarify the distinct roles of a housing strategy and the City Plan. The housing strategy focuses on housing needs and solutions. It addresses major challenges like the quality and safety of our housing stock, affordability across tenures, homelessness, and the delivery of housing services. The City Plan has a broader scope and includes strategic policies to address priorities for the development and use of land in the city. It encompasses the entire city's development, including the development of housing (including affordable housing), transportation, infrastructure, economic opportunities, and environmental concerns. The housing strategy informs the City Plan and aims to ensure that housing priorities and needs are integrated into the city's overall development strategy.

Many of the issues raised in relation to Priority 2 are more appropriately addressed through the City Plan. The council has begun the process of reviewing the City Plan Part 1 which will set out the strategic planning framework for the city to 2041. This gives the council the opportunity to set a revised housing delivery target and address the mix of housing that the city needs going forward. It will be shaped by the Strategic Housing Market Assessment 2023, the Housing Strategy 2024 to 2029 and consultation with residents and other stakeholders on proposals brought forward by the council.

The City Plan Part 2 was agreed in 2022 and supports the delivery of several of the solutions to the city's diverse housing needs suggested by respondents. It encourages the provision of a wide range of housing delivery formats including community led housing, self and custom build and modular build. It also sets out the council's expectations for high quality design, making effective use of brownfield sites and includes policies requiring adaptable and accessible homes, space requirements, energy efficiency and access to outdoor amenity spaces. The citywide urban design framework Supplementary Planning Document (SPD) sets out citywide design guidance that must be considered in the determination of planning applications for new residential development. Design codes were introduced by Levelling-up and Regeneration Act 2023. Although we are awaiting secondary legislation / regulations, we are piloting this approach in the city centre and will roll out across the city in due course.

The council makes active use of its own land and building resources to support the delivery of affordable housing - whether that is regularly reviewing assets and landholdings to support a pipeline of sites or to repurpose a building such as at

Palace Place. We will continue to look for opportunities to make the best use of our Housing Revenue Account³ assets.

Theme: Housing suitable for specific groups

Some respondents highlighted the need for housing that meets the needs of specific groups such as LGBTQ+ people, disabled people, those with learning disabilities and autism and ex-service personnel. Some draw attention to changing needs linked to the aging population. The need for homes to be adaptable and accessible for people with disabilities was highlighted by several respondents. There were also calls for affordable housing suitable for key and essential workers. Supply of safe, good quality, affordable student housing was mentioned by several respondents.

Initial response

The City Plan supports the provision of a range of housing options for older and disabled people and those with specialist needs. As referred to above, all new residential development must meet accessible and adaptable building control standards and at least 10% of affordable housing are required to be fully accessible for wheelchair users. Council services collaborate to develop housing suitable for people with disabilities including adapted housing suitable for disabled adults, children and young people. There are also policies in place to support the provision of high-quality purpose-built student accommodation which favour the more affordable cluster type development. The City Plan requires student housing developments to provide an appropriate security presence, space for living and studying and appropriate amounts of communal space.

Theme: Planning and development

Some respondents suggest that local communities should have more say in the planning of development and that specific groups should be consulted on their housing needs. There is support for Community Land Trusts and third-sector non-profits as alternatives to the private sector in the provision of housing. Some responses indicate a desire to protect green spaces and avoid overdevelopment. Respondents proposed more car-free developments as well as arguing that current development practices favour market rate housing over affordable options.

Initial response

Public consultation will be undertaken at each stage of the process in bringing forward the review of the City Plan. The first stage is to gather views from residents and all stakeholders on what are the key issues for the plan to address and housing provision is clearly one of the most important issues. Adopted planning policies already support and encourage a wide range of housing delivery options. Residents may also comment on any planning application for development that is made by registering their comments of the council planning portal. The council consults widely during the design stage of our own development projects, often using Planning for

³ The Housing Revenue Account (HRA) is intended to record expenditure and income on running a council's own housing stock and closely related services or facilities, which are provided primarily for the benefit of the council's own tenants.

Real to ensure that the views of the community inform the design. This goes beyond the requirements of the planning process.

Theme: Affordability

Many respondents express concerns about the high cost of private renting and home ownership in the city. Some criticised the lack of a clear strategy on how the council will tackle affordability in the private rented sector. Some also suggested rent caps to address the gap between social and private rents. Several respondents called for 'truly affordable' housing that aligns with local incomes. The need to house key and essential workers was a concern for some respondents. The impact of buy to let, second homes, short-term lets and under occupation on housing availability and affordability were also raised.

Initial response

Delivering affordable homes is one of our greatest challenges as evidenced by the large number of responses relating to this issue. While we have a requirement for the provision of affordable homes on new developments, we will also look at all other options for creating affordable homes to meet the needs of local people. As part of the review of the City Plan Part 1, the council will commission an affordable housing viability study which will help inform setting affordable housing requirements for new development.

We have several programmes and projects underway. These include New Homes for Neighbourhoods, an estate regeneration programme for building medium to large developments of council homes on council-owned land. We are also working to maximise social value from projects within the programme during the construction phase. Hidden Homes is a programme of smaller scale development which provides new council homes by converting empty or 'hidden' spaces in council properties and building on small pockets of land. Homes for Brighton and Hove is a joint venture between Brighton & Hove City Council and the Hyde Group. We have combined resources to provide 1,000 new affordable homes for local people.

We continue to buy back former council homes sold under the Right to Buy, to let to people in housing need. To date the 'buy back' programme has brought over 350 homes. We also have looked at opportunities to buy properties off plan with Kubic Apartments providing 38 homes and the purchase of 21 homes at the former St Aubyns School, Rottingdean.

Short term lets have the same use class as other housing and we are unable to treat them differently under current planning rules. We do have a policy in City Plan Part 2 that allows us to consider whether a loss has occurred through a change of use where evidence points to this. The previous government consulted on introducing a new use class and we are awaiting clarification of this government's intentions. This could allow us to look at short term lets differently.

We are actively working to reduce the number of private sector long-term empty homes in the city and bring these properties back into use. Our Empty Property

Working Group are developing a collaborative and strategic partnership to ensure we utilise all the powers at our disposal to tackle this issue. The council agreed to impose the premium rate of council tax for homes that have been empty for over a year in April 2024 with this also applying to second homes from the start of the 2025-26 financial year. The City Plan Review will explore this matter further with a view to introducing a principal residence policy such that new housing developed in the city should be marketed to local people only.

Theme: Community and physical infrastructure

Some respondents called for greater consideration of the impact of development on existing services such as healthcare and education. They stress the need for services like doctors and dentists alongside new housing developments as well as community facilities, green spaces, roads, and transport connections. The need for development that fosters community spirit and provides local amenities is mentioned.

Initial response

The council needs to balance the need for additional housing with the need to stimulate the local economy, protect and enhance the city's heritage and cultural offer and access to open spaces. These are all issues that will need to be addressed in the forthcoming review of the City Plan Part 1. The plan review will also need to look at the need for additional infrastructure to accommodate demand generated by new development. An infrastructure delivery plan will accompany the draft plan.

Priority 3 Prevent homelessness and meet housing need

3.1 Increase our effectiveness in preventing homelessness

3.2 Reduce the number of households in temporary accommodation

3.3 Focus our assistance on people who need most help

Support for proposed priority

Amongst those who responded to this question (311/347) there were high levels of support for the proposed priority (81.3% agree or strongly agree; 5.2% disagree or strongly disagree). There were similar levels of support for the three proposed areas for focused action.

Theme: Targeted prevention

Some respondents emphasised the need for targeted support to prevent homelessness in vulnerable populations, including LGBTQ+, refugees and asylum seekers, care leavers, ex-service personnel, people with autism, and those with multiple compound needs.⁴ There were calls for better support for single mothers, people living in vans, and other vulnerable groups who may not have adequate housing or access to support. A holistic approach to preventing homelessness is

⁴ Multiple compound needs refers to the needs of people who experience a number of needs, for example, drug and alcohol problems, mental health problems, disability or long-term health conditions.

advocated by some, addressing interconnected issues such as employment, health, social networks, and living standards

Initial response

We recognise that people from some groups or those with protected characteristics are at higher risk of homelessness than others. Some respondents pointed out that the intersection of different characteristics can heighten risk. We are keen to work with members of the groups identified, their advocates and community organisations to further develop a targeted approach to homelessness prevention. We believe that the best way to do this is to ensure that we deliver a homelessness prevention service that is accessible, inclusive and equitable for all. We will use data and evidence from our services and our partners to identify those who are at greatest risk of becoming homeless or who are more vulnerable when they are homeless to target our services and our support. We will also work with our partners in the Multiple Compound Need programme to better integrate our service response.

Theme: The role of the Third Sector

The importance of working collaboratively with local services, charities, and organisations was stressed by some to better support those at risk of homelessness or who are homeless. The importance of funding and resources for community organizations and charities was highlighted, with concerns about recent funding cuts affecting homelessness prevention and support in the Third Sector

Initial response

The Third Sector deliver important and valued services to people at risk of homelessness as well as those who have become homeless. We want to reiterate our commitment to work in partnership with the sector. We currently commission a range of services from Third Sector organisations. In the context of diminishing resources and increasing need, we must sometimes take difficult decisions about the services we commission. In doing this, we will always seek to achieve the best possible outcomes for people in housing need within the resources we have available.

Theme: Support for people who are homeless

Some respondents advocated for a Housing First approach as a tool to address homelessness. Respondents suggest that more preventative measures are needed to address the root causes of homelessness, including early intervention, support services, and tackling issues like addiction. Some respondents pointed out that the integration of support services such as healthcare, mental health services, and social care is crucial to addressing homelessness comprehensively.

Initial response

Brighton & Hove's Housing First service is one of the largest programmes of its kind in the country. It offers wraparound support for people with a range of complex needs and a history of rough sleeping. It provides the security of a home first before exploring additional support tailored to individual needs. This might involve help to deal with substance abuse, support to get treatment for mental or physical health issues, or assistance with accessing training or employment. The service is funded by a central government grant, commissioned by the council and run by St Mungo's.

In advance of the public consultation, the council received detailed proposals for the development of a homeless health hub. We support the principle of greater integration and are working towards this in several service areas. Working with our partners, we will explore how we best integrate health, housing and other services to improve outcomes for people who are homeless through the Multiple Compound Needs programme.

Theme: Emergency and temporary accommodation

Concerns were raised by some about the quality and safety of emergency and temporary accommodation, with suggestions for improvement, such as bringing provision in house, and greater accountability for external providers. The high local cost of housing and the challenges faced by those in low paid employment or on benefits are noted, with calls for more affordable housing options to ensure that people can move on from temporary and emergency accommodation.

Initial response

We recognise that the draft strategy does not place enough emphasis on improving the quality of existing emergency and temporary accommodation. While we will continue to focus on reducing the numbers of people placed in emergency and temporary accommodation, we will also be clear that improving the quality of accommodation is also important. We do not believe that bringing the management of emergency and temporary accommodation in house is the best option. We think that the level of specialism needed is best met by an external provider. We are bringing forward proposals to reprocur our services in this area and will seek a partnership with a provider to deliver better value and flexibility as well as improved outcomes for clients.

Theme: Allocation of social housing

There were calls for more transparency around the allocation of social housing and the bidding system. Some respondents suggested prioritising local people, others called for priority to be given to those in high need, including people fleeing domestic abuse or modern slavery, refugees and asylum seekers, people leaving care, people with multiple, complex needs.

Initial response

We have developed detailed proposals for a new housing allocation policy. The consultation on these proposals ended on 8 June 2024 and a new policy will be brought forward for approval by the council's Cabinet in the autumn. Proposals included removing the queuing system and a revision of the criteria for prioritisation. The local residency criteria will be refreshed enabling people with a long-term connection to the city to continue to qualify for the housing register if they must move away for a period, for example, for life events such as caring for family members outside the city. The new policy will also ensure that we meet our legal duties in the allocation of social housing.

Priority 4 Support independence and improved health and wellbeing for all

4.1 Work with partners to develop safe, healthy and inclusive estates and neighbourhoods

4.2 Support people to live independently

4.3 Promote healthy housing for our residents

Support for proposed priority

Amongst those who responded to this question (313/347) there were high levels of support for the proposed priority (82.7% agree or strongly agree; 2.3% disagree or strongly disagree). There were similar levels of support for the three proposed areas for focused action.

Theme: Community spaces and safety

Some respondents suggested focusing on creating safer streets, improving community spaces and giving more attention to the impact of crime and anti-social behaviour on neighbourhoods and residents. The importance of educating residents about their responsibilities and empowering communities through local decision-making was also emphasised by some.

Initial response

Supporting communities to develop networks with friends and neighbours creates more community activities, reduces social isolation, improves wellbeing, and promotes resilience and independence. The council has previously worked with communities in East Brighton, Hangleton & Knoll and Moulsecoomb & Bevendean to produce Neighbourhood Action Plans. We are currently reviewing our approach to neighbourhoods and will bring forward proposals for empowering communities to shape local decisions in due course.

We take crime and anti-social behaviour seriously and have a legal duty to take crime and disorder into consideration in everything we do. We will continue to work with residents and our partners to tackle crime and anti-social behaviour in neighbourhoods and on our estates. We are keen to support the creation of Neighbourhood Watch Groups, Residents Associations, and Local Action Teams. Residents have several channels for reporting crime and anti-social behaviour. We will continue to publicise these and seek to strengthen our response where possible. Educating new council tenants on their rights and responsibilities is part of our initial engagement during their introductory tenancy.

Theme: Inclusivity and specific needs

A significant number of respondents emphasised the need for housing that is inclusive and caters to the specific needs of different groups, including people with disabilities, refugees and migrants and those with mental health issues. There were calls for a range of housing options to cater to diverse needs, including shared community spaces to encourage social mixing as well as support for people with complex needs. Some respondents drew our attention to the difficulties experienced

by individuals and their neighbours when people with challenging or complex needs are housed within a mixed community.

Initial response

We acknowledge that the draft strategy does not refer explicitly to the needs of some groups. There are existing plans and strategies relating to housing needs already in place for people with learning disabilities, people with autism and people with mental health issues. We recognise that we also need to revisit our approach to the provision of housing for older people. We will reflect these priorities more clearly in the final strategy and reflect actions from existing plans within our housing strategy action plan. It is our expectation that, just as the housing strategy is derived from the council plan, any subsequent council plans with a housing element, should align to the priorities in the final housing strategy. Where these plans are agreed in partnership with other organisations, we would expect that these also consider the priorities set out in the housing strategy.

Theme: Supported housing and independent living

There were calls for support mechanisms for those who may not be able to live independently due to high-level support needs, as well as for young people with autism or learning disabilities. The need for provision for those requiring lifelong care was mentioned, highlighting the importance of thinking about care and support as well as independent living housing solutions. The shortage of social care staff and the need for better-resourced services were highlighted as critical issues that need addressing.

Initial response

The Supported Housing Act (2023) requires the council to review certain types of supported accommodation and develop plans for supported housing going forward.⁵ This is set out in the draft housing strategy. Respondents are correct about the challenges involved in delivering services to those who need support to live independently or who need long term care. We also acknowledge that the strategy does not adequately address the needs of those who are unable to live independently or whose housing and support needs we are not currently able to meet in the city. We recognise that we also need to review our approach to sheltered and retirement housing and will make this explicit in the strategy. We will work with social care colleagues, specialist housing providers and through our existing partnerships to develop and bring forward more detailed plans.

Theme: Healthy housing

Damp and mould were recurring issues raised by respondents. Others flagged overcrowding, access to green spaces and active transport options. The impact of noise on people's mental health and wellbeing was also raised by some.

Initial response

We are developing detailed plans for tackling damp and mould in our own properties and we will work with landlords to address this in their properties. We anticipate that

⁵ Some supported accommodation is known as 'exempt' because it is exempt from the usual caps on housing benefit levels, meaning residents can receive a higher amount of housing benefit than usual. This additional housing benefit usually assists with the costs of providing care and support.

Ahwaab's Law, which currently only applies to social landlords, will be extended to private sector rented properties. Where we have the powers we will enforce compliance with the requirement for landlords to investigate and address damp and mould in their properties.

While healthy housing, apart from damp and mould, was not a major concern for many of those who responded to the consultation, we believe that good housing is the cornerstone of good health and wellbeing. We also recognise the wide-ranging impacts that cold homes can have on health and wellbeing. We will provide further detail on how we will continue supporting residents with fuel poverty and affordable warmth later in the year. We have a wide range of services and initiatives in place or planned to promote health and wellbeing, including mental health support, physical activity, food growing and more.

There are planning notes supporting food growing and our physical activity strategy supports an active city including active environments. We also incorporate a range of additional healthy and inclusive design standards for council led schemes.⁶ Housing is key to delivery of an active city as is easy access to other facilities and opportunities, including green spaces, sports and leisure facilities as well as facilitating active travel.

Priority 5 Provide resident focused housing services

5.1 Listen to and engage with our residents

5.2 Ensure our housing services are accessible, fair and inclusive

5.3 Deliver effective, high quality housing services

5.4 Work with our partners to agree and deliver shared priorities

Support for proposed priority

Amongst those who responded to this question (311/347) there were high levels of support for the proposed priority (79.2% agree or strongly agree; 2.6% disagree or strongly disagree). There were similar levels of support for the four proposed areas for focused action.

Theme: Community engagement and consultation

Some respondents called for ongoing, meaningful consultation with communities, including diverse voices and proactive engagement and criticised more traditional approaches to consultation and engagement often used by the council.

Initial response

Thank you to respondents who reached out to say they would like to be remain part of the conversation on housing in the city. We acknowledge the need to take a considered and nuanced approach to engagement, using a variety of methods, recognising that one-size does not fit all. To engage as many diverse people as possible we need to use different types of engagement. The council has recently

⁶ Our Employer's Requirements and Design Guide for our own schemes incorporate the following standards: Building for a Healthy Life Design Code ; National Design Guide; Secured by Design; HAPPI; RIBA Challenge Targets ; Habinteg Wheelchair Housing Design Guide; Commission for Architecture and the Built Environment's Principles of Inclusive Design 2006.

developed a new community engagement framework setting out standards and principles for engagement and a toolkit for our staff. We will be working to ensure that this informs our practice across the council. We have also reviewed how we engage with our tenants and leaseholders and will implement recommendations in the coming months.

Theme: Fairness and equity

Several responses highlighted the need for fair and equitable services, with some expressing scepticism about the fairness of the current housing system.

Initial response

We are faced with significant challenges in terms of lack of supply and increasing demand. The council will always prioritise meeting its legal and regulatory duties. We recognise however that, especially for the most vulnerable, our standard operating model does not necessarily result in the best outcomes. We will seek to learn from best practice elsewhere, as well as from our 'outstanding' rated children's services, including introducing a relational model for working with our most vulnerable clients. We will provide more assistance to help people move from larger social housing properties, for instance when children leave home. Through planned changes to our housing allocation policy, we will provide more opportunities for households to utilise other types of housing while remaining on the housing register.

Theme: Inclusivity and tackling discrimination

The need for inclusivity in services and addressing discrimination, particularly against LGBTQ+ individuals, disabled people, single mothers, people on benefits, migrants and refugees and those from other diverse backgrounds, was stressed by some. The need for culturally sensitive services and proper training for staff was also mentioned. There was also some scepticism about how serious the council and its partners are in dealing with issues such as racially motivated harassment and anti-social behaviour.

Initial response

The council takes crime and anti-social behaviour, including hate crime, seriously. We will work with our partners and the relevant authorities to identify perpetrators and, where appropriate, take measures to prosecute them. We also acknowledge that some groups have difficulty accessing our services or are over- or under-represented in aspects of service provision, for example, in emergency and temporary accommodation. We are keen to work with people with lived experience and to use our service data and intelligence from our partners to identify who is using our services, make those services more inclusive and address inequity and discrimination. To help us do this we have agreed a council wide Anti-Racism Strategy and an Accessible City Strategy with detailed action plans, including for housing services. This includes staff training and recruitment and retention policies to ensure that our workforce better reflects the people that we serve. This autumn we will be consulting on a new Hate Incidents Policy for council tenants and leaseholders.

Although not an issue raised during the formal consultation, feedback received after the consultation had closed drew our attention to the omission of the specific needs of gypsies and travellers in the draft strategy. We will address this in the final draft.

Theme: Accountability and transparency

Many respondents asked for more accountability and transparency in the council's actions and approach, with a focus on practical solutions. Some suggest that a cultural shift within the council is necessary for the strategy to be successful.

Initial response

From 1 April 2024, the Regulator of Social Housing holds the council and other social landlords to account against four customer standards. These include a neighbourhood and community standard requiring social landlords to engage with partners so that tenants can live in safe-well maintained neighbourhoods; a standard about ensuring the safety and quality tenants' homes; a tenancy standard to ensure the fair allocation and letting of homes and how tenancies are managed and ended by social landlords; and, a transparency, influence and accountability standard including prescribed measures of tenant satisfaction. The council will be required to collect and publish information on its performance against a core set of measures. The Regulator will hold us to account for our performance.

Theme: Access to services and quality

Some respondents asked for physical offices and improved telephone services to assist those who struggle with online or have difficulty using technology. Some describe council processes as complicated and hard to navigate, especially for those who have difficulty communicating, for example, if English not a first language. There is a perceived lack of support to address access issues, for example with interpreting services. Several respondents called for improvements in the delivery of council repair services, including faster response times, improved contractor behaviour, and overall service quality.

Initial response

There are several ways that people can access our services. Where appropriate, for example, in paying rent, we provide online, self-service options so that our customers can make their transactions easily and conveniently. We also seek to make information about our services and other sources of support available online. However, we accept that this is not appropriate for everyone. Our telephone helpdesk handles a significant volume of calls (71,000 last year). We recognise that we also need to improve our call handling. Part of the solution will be to improve our online offer, so that people can find the information they need or make a transaction themselves. This means that we can focus on the issues that require a person-to-person service. Again, this will not be appropriate or accessible for everyone. While we acknowledge that some people prefer face-to-face interaction, our diminishing resources mean that we are only able to offer this on a limited basis. We will always seek to target support to where we have a duty to provide this and where there is greatest need.

Theme: Communication and customer service: Improving communication and customer service was highlighted by some as critical for the delivery of effective housing services. Training in trauma informed approaches for frontline staff was recommended by some respondents. Some observed that it is unclear what standard of service people can expect from the council and how they can complain if this standard is not met.

Initial response

Based on this feedback we accept that we need to make improvements to improve people's experience of using our services. Our Customer Promise sets out the standards and principles of how we deliver services to our customers and provides a framework to monitor and measure our performance. We will also work to help people understand how our policies and processes operate, including improving the accessibility of the information we provide.

To help us develop an improved operating model we have begun to roll out a programme of trauma informed practice. Training and support have initially been offered to staff working with the most vulnerable clients but will be rolled out to other frontline staff as resources permit.

We publish information about how to complain and regularly publish performance information and how we are doing against our targets. We recognise that we need to improve the reach of this information and let people know what are doing to deliver better housing services. The Regulator of Social Housing now holds the council to account for its performance against a set of Consumer Standards and we are obliged to publish its findings and set out how we plan to improve.

Theme: Partnerships and collaboration

The importance of working with a range of partners, including private developers, private and social landlords, anchor institutions such as the universities, NHS trusts etc, was stressed by some respondents. The council was challenged to be clearer about its priorities for partnership and partnership working. The potential role for people with lived experience and community organisations as partners was also highlighted.

Initial response

We know that we will not be able to deliver the strategy without a range of partnership arrangements in place. These include partnership with our contractors and providers, joint working with other council and public services, a clearer understanding with the Third Sector, collaboration with other social landlords and closer relationships with the city's businesses and anchor institutions. We are currently reviewing our partnership arrangements for tackling homelessness and rough sleeping. We will identify how we best involve people with lived experience in this work, including at a strategic level.

We also recognise that Brighton & Hove is part of a broader region, and some partnerships cover a larger geography. Our relationship with neighbouring local authorities, housing associations and NHS organisations are examples of these. Some partnerships are in place already, others need to be built. We will revise this section of the strategy to be clearer about what we want to achieve through partnership working.

Other issues raised

Theme: Implementation and follow-through

Some respondents were sceptical about the implementation of the strategy and called for the inclusion of more specific actions and deliverables in the document. A few respondents were also sceptical about the potential for real change or improvement, suggesting that past initiatives have not led to tangible impact from their perspective. Some asked for more clarity about how the strategy will be implemented and how progress will be tracked. The importance of using data to understand residents' needs and inform the delivery of the strategy was also mentioned.

Initial response

As set out at the beginning of the draft housing strategy, this is intended to be a short, high-level document setting out our priorities and where we will focus our activities over the next 5 years. Based on feedback from earlier engagement and feedback from the consultation, we will publish a more detailed action plan for Year 1 of the strategy (2024/25). This will include deliverables, key performance indicators and targets. This first year will reflect activity that is already resourced and where funding is in place. However, we will use the strategy to guide action and financial planning for subsequent years. We will publish information about our progress and refresh the action plan on an annual basis.

Theme: Financial considerations

There were some concerns expressed by respondents about the financial impact of proposals on businesses and households and questioned the deliverability of the strategy given pressure on council budgets.

Initial response

Where we bring forward specific proposals, for example, extension of licensing schemes or plans for housing development, we will seek to consult with those impacted and use those findings to inform our decisions. The actions we deliver will be shaped by the strategy but will need to be delivered in the context of our statutory duties and our financial and other resources. We will also seek to collaborate with other organisations to make the most of our resources to deliver improved outcomes for the city.

3. The consultation process

Developing the draft strategy for consultation

The vision of 'Homes for everyone' and the core priorities for the strategy are taken from the Council Plan 2023 to 2027. Following early engagement with the council's executive leadership team, directorate management teams, and relevant heads of service, five proposed priorities and areas for focused action for each, were developed and tested with members of the Housing & New Homes Committee and policy committee chairs. All councillors were invited to take part in a workshop to discuss these proposals. The Housing & New Homes Committee reviewed the draft strategy and agreed the consultation plan at its meeting on 13 March 2024.

The work to develop the draft strategy was overseen by a small officer project group initially led by the Executive Director for Housing, Neighbourhoods & Communities and from 18 March by the Interim Corporate Director Housing, Care & Wellbeing – Housing Lead. The project group was supported by a group advising on public consultation.

Formal consultation

The consultation on the draft strategy was launched on Your Voice, the council's consultation platform, on 18 March 2024. The project group reviewed progress fortnightly and considered potential changes to the consultation approach. This included reviewing responses received across the city's demographics and housing tenure types. Based on these reviews the project group adjusted the consultation plan and included targeted promotion and in person consultation events. It also extended the consultation period to allow more time for consultation with people with learning disabilities at the request of members of the Learning Disability Partnership.

Promoting the consultation

Allowing for duplication between the different mailing lists, over 500 groups and organisations were invited to take part in the consultation. In addition, they were asked to promote the consultation to their members, service users, staff and volunteers. All were sent a reminder at the beginning of May from the lead member for Housing & New Homes. Councillors were also asked to promote the consultation through their networks.

An invitation to take part was sent to:

- 120 individuals and organisations on a core stakeholder list
- 429 individuals, groups and organisations on mailing lists held by the council's Community, Equality and Third Sector teams

- 552 Third Sector groups and organisations on the Community Works mailing list
- 25 organisations in the Homelessness & Rough Sleepers Network

As the consultation progressed, invitations were also sent at the request of colleagues to:

- 69 organisations and individuals who took part in a local conference on housing for people with learning disabilities
- 61 groups and organisations in the Suicide Prevention Partnership
- 61 groups and organisations in the Dementia Action Alliance

Other publicity

The council website included a news story on 18 March to promote the launch of the consultation and a further item on 29 April.

The Wave (council staff intranet)

Social media

Homing In magazine for council tenants and leaseholders

A range of e-newsletters produced by council services and our partners

200 posters were distributed for display in public buildings, including in housing offices and on residents' noticeboards.

Plasma screens in council buildings including libraries and family hubs

Face to face engagement

Members of the project team attended meetings and events to promote the consultation and seek views from

Area Housing Panels

City Management Board

NHS Sussex Integrated Care System Executive Group

Just Life - Housing & Homelessness Focus Day

The council's Policy Network

The project team also organised an online consultation event attended by representatives from 36 groups and organisations on 8 May 2024 and a public event at Hove Town Hall attended by 16 individuals on 11 May 2024.

Accessibility

The online survey was hosted on Your Voice, the council's consultation platform.

The platform is compatible with international accessibility standards for web content.⁷

It also has the option for people to complete a survey in any of the 10 most spoken languages in Brighton & Hove.

⁷ [WCAG 2.1 AA](#)

Large print, hard copy surveys were available on request by email or phone. An offer to provide the survey in other formats was made on the portal. As a result, an Easy Read guide and survey was requested during the consultation. This was produced for us by Speak Out, a local organisation with expertise in Easy Read. The guide was made available as hard copy and for download on Your Voice.

Groups and organisations who submitted a consultation response

- ACORN Brighton
- Bristol Estate Leaseholders & Tenants Association
- Bridging Change
- Brighton Students Union
- Brighton & Hove City Council – Health, Care & Wellbeing, Commissioning & Partnerships
- Brighton & Hove Community Land Trust / Who Owns Brighton
- Brighton & Hove Energy Services Co-op
- Brighton & Hove LGBT Switchboard
- Clarion Housing Association
- Clock Tower Sanctuary
- Common Projects Limited
- Community Voices Group
- Grace Eyre Foundation
- Guinness Partnership
- Hyde Group
- iHowz
- Impact Initiatives
- Institute for Contemporary Theatre
- Justlife
- Making It Out
- Moda Living
- MySafeHome Limited
- NHS Sussex
- NHS Sussex Brighton & Hove Mental Health Accommodation Group
- Older People's Council
- RISE
- Rocket Artists CIC
- Safe Haven Sussex
- Single Parent Information Network
- SJOG Hospitaller Services - Support for victims of Modern Day Slavery & Trafficking under the NRM Scheme of UK Government
- Speak Out
- Speak Out East Drop In
- Speak Out Link Group
- Sussex Beacon

- Sussex Nightstop
- Turning Point
- University of Sussex
- Urban View
- Voices in Exile
- Zetetic Housing