

Brighton & Hove City Council

Cabinet

Agenda Item 24

Subject: Library Sustainability Plan

Date of Decision: 17 July 2025

Report of: Cabinet Member for Sports & Recreation

Lead Officer: Corporate Director Families, Children & Wellbeing

Contact Officer: Name: Ceris Howard – Head of Library and Customer

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Ward(s) affected: All wards for proposed changes to Jubilee and Hove Libraries. Patcham & Hollingbury Ward, Rottingdean & West Saltdean Ward and Westdene & Hove Park Ward are directly affected by proposed library closures in those areas.

Key Decision: No

For general release

1. Purpose of the report and policy context

- 1.1 Local Authorities have a statutory duty under the Public Libraries and Museums Act 1964 to provide a comprehensive and efficient library service for all persons who live, work or study in the area (section 7), taking into account the resources available. The Brighton & Hove City Council Plan 2023 to 2027 also provides a commitment to increase use of our libraries and improve facilities and library users' experience.
- 1.2 The Department for Culture, Media and Sport (DCMS) is responsible for superintendence and promoting the improvement of libraries. If a Local Authority wishes to make changes to the library provision, the service should be able to demonstrate:
 - plans to consult with local communities alongside an assessment of their needs (including any projections of need)
 - consideration of a range of options (including alternative financing, governance or delivery models) to sustain library service provision in their area
 - a rigorous analysis and assessment of the potential impact of their proposals
- 1.3 In this context, the city council has committed to a change in public library provision in the city to make sustainable improvements and to deliver on the savings plan for 2025/26 and future years. This paper provides an overview of the sustainability plan for the Library Service, which supports delivery of the council priorities to invest in the city and to enable lifelong learning. This involves a proposed reduction in the number of community libraries and opening hours in central libraries. The report seeks agreement to start a

public consultation to seek views from a range of stakeholders on these proposals.

2. Recommendations

That Cabinet:

- 2.1 Notes the sustainability plan for Libraries as set out in this report
- 2.2 Agrees to commence a public consultation on the proposals, specifically covering the following suggestions:
- 2.3 Consult on the proposed closure of Hollingbury Library
- 2.4 Consult on the proposed closure of Rottingdean Library
- 2.5 Consult on the proposed closure of Westdene Library
- 2.6 Consult on the proposed changes in opening hours at Hove Library
- 2.7 Consult on the proposed changes in opening hours at Jubilee Library

3. Context and background information

Current library service offer across Brighton & Hove

- 3.1 The city's public library service currently comprises 13 libraries, including the flagship Jubilee Library in central Brighton, Hove Library, and 11 community libraries located in Coldean, Hangleton, Hollingbury, Moulsecoomb, Patcham, Portslade, Rottingdean, Saltdean, Westdene, Whitehawk and Woodingdean. Jubilee Library, opened in 2005, is one of the most visited libraries in the UK, recording over 830,000 visits in the 2023/24 period and accounting for about 50% of the city's library transactions. The community libraries are single staffed from one to three days per week, and most are open to the public 7 days/week through the use of Libraries Extra. This enables customers to access the library when unstaffed, using their library card and PIN to access the building. These libraries are monitored by CCTV and supported through a phone line directly to Jubilee Library.
- 3.2 Brighton & Hove's 13 libraries attracted a total of 1,256,000 visitors in 2024-25. Jubilee and Hove, being the most central libraries, are the busiest buildings. Of the remaining 11 community libraries, the newly refurbished Saltdean Library (based at Saltdean Lido) received over 40,000 visits in this timeframe. Hollingbury Library (based at Old Boat Corner Community Centre) received the least visits at 6,500.
- 3.3 Many customers already use more than one of the city's libraries and take advantage of access to services seven days a week using Libraries Extra. Residents are accessing a range of resources, including physical book stock and e-resources; over 500,000 e-library resources were borrowed in 2024-25, including e-books, newspapers, magazines and e-audio books.

Library strategy and vision

- 3.4 The city's Libraries Strategy 2022-25 sets out the vision for libraries to be a vibrant and accessible community asset. The current strategy expires at the end of 2025 and a new strategy will be launched in 2026, building on this year's work and informed by the public consultation this summer if it were to go ahead. The new strategy will root the future vision for city libraries as sustainable and embedded community resources, supporting community resilience. Libraries take a one council approach to supporting residents and visitors.
- 3.5 A Needs and Use Analysis is required for any proposed change to a Local Authority's statutory library provision. This is provided as Appendix 2 and identifies areas in highest need of library services. The plans for maintaining library service sustainability are covered within this paper, enabling the delivery of agreed budget savings and developing the longer-term plan for libraries including post Jubilee Library PFI contract arrangements in 2029.
- 3.6 If the proposed changes are implemented, Brighton & Hove will retain 10 libraries, which will continue to provide an appropriately comprehensive library service, while delivering efficiency savings to support the mid to long-term sustainability of services.
- 3.7 The new strategy, from 2026, will focus remaining resources on those libraries serving residents at highest risk of the impact of deprivation, increasing use of facilities in areas of greatest need and targeting services to those residents who could most benefit from access to resources and support, as identified in the Needs and Use Analysis.

Methodology

- 3.8 Part one of this needs and use phase consists predominantly of desk-based research and data analysis. Data reviewed includes footfall, borrowing data (about what resources are borrowed, when and where) from library management systems, 2021 Census data, ONS and DWP data available via the Local Insight platform, and additional data provided by colleagues from across BHCC including numeric Schools Census, travel and Adult Social Care data.
- 3.9 Part two of the needs and use analysis will comprise a formal public consultation, alongside stakeholder engagement events and activities, to gather additional data and fill some of the gaps to better understand library customers' current use of libraries and their needs.

Budget pressures and savings

- 3.10 As part of the city council budget agreement for 2025/26, a £69,000 saving target was agreed, to be achieved through a reduction in opening hours at the Jubilee and Hove Libraries, as well as a review and closure of some community libraries.

- 3.11 It was also indicated, via the Medium-Term Financial Strategy, that a further £140,000 would be achieved during 2026-27 through the reduction of library services (closures and opening hours), as the process for change would cross the financial years, showing part-year savings in 2025-26, completing in 2026-27
- 3.12 Other savings were identified for this year, which have been implemented through operational service efficiencies. In addition to the savings identified for these two years, the service faces budget pressures due to the rising cost of operating and maintaining public buildings. Concentrating resources on fewer physical library locations, whilst maintaining a geographic spread across the city, will support longer-term sustainability of the wider city service, as well as safeguarding the quality of library provision.

Proposed changes from April 2026

- Closing Hollingbury, Rottingdean & Westdene Libraries
- Reducing opening hours at :
- Jubilee Library – 2 hours Monday evening (5-7pm) & 3 hours Sunday afternoon (2-5pm)
- Hove Library – 2 hours Wednesday evening (5-7pm) & 3 hours Saturday afternoon (2-5pm)

Rationale for proposed changes

- 3.13 It should be noted that, in consideration of any reduction of hours and any libraries which should be proposed for closure, a Needs and Use Analysis has been started, see Appendix 2. The analysis identified which libraries were of highest priority for the city to maintain and promote, based on the needs of the areas they serve. Geographic spread, the operating costs of different buildings, and the current usage of each library were also taken into consideration when developing the recommendations for reductions in services to meet the savings identified.
- 3.14 Brighton & Hove City Council currently offers more library provision per resident than average across the country. Consideration is given to the travel times and convenience of library location; currently there are clusters, particularly in the east and north of the city, with multiple libraries within 3 miles of each other. Were the proposal to reduce the city's libraries from thirteen to ten to be taken forward, the city would still have more libraries per resident than the national average with a reasonable geographic spread.
- 3.15 Based on measures of need, including Index of Multiple Deprivation (IMD), economic activity and receipt of benefits and free school meals, certain libraries were identified as priorities in order to support those areas at most risk of disadvantage. Priority levels of high, medium and low were allocated to support decision making on proposals for change.

High priority – meeting the needs of large numbers of customers, serving areas with most disadvantage. These libraries were not considered for closure.

- 3.16 Hove and Jubilee Libraries are by far the busiest , serving a broad range of customers from across the city and offering a wide variety of services, including Council Help Desks, events for children and families, free to use PCs and spaces for community groups to meet. Jubilee Library footfall regularly exceeds 2,000 people per day and it is one of the most popular spaces in the city for students to study, particularly during exam periods. While these libraries are serving large numbers of customers and meeting the needs of disadvantaged people in the city, they are also the most costly to manage, with high staff numbers. These libraries need to be considered for reductions in staffed hours in order to reduce the cost of running the service.
- 3.17 Hove Library's membership base is broad, with most active borrowers from wards to the west of the city. Data suggests that those living in the library's catchment area are at low risk of deprivation, although there are areas of need which should be recognised, with some areas supporting higher numbers of older people and low income families.
- 3.18 Hove Library's listed status means that it is expensive to run and maintain, although income generated from a nursery school tenancy as well as room rental, goes some way to mitigate this.
- 3.19 Jubilee Library is situated centrally and serves residents of its immediate central wards, as well as those from further afield travelling in and out of the city centre for work and study. The library serves some of the city's most deprived wards, in particular West Hill & North Laine, Queens Park and Kemptown.
- 3.20 Hourly footfall at both Jubilee and Hove peak on weekday mornings, remain steady throughout the day but drop off gradually between 5pm and 7pm on their respective late opening days. Saturdays are particularly busy at Jubilee and sustained high footfall matches that of weekday mornings. Sunday footfall is lower with 11am-12pm being almost three times as busy on average as 4-5pm. At Hove, Wednesdays 6-7pm are particularly quiet, currently seeing an average of less than 30 visits. Saturday footfall reduces later in the day, with 10-11am being twice as busy on average as 4-5pm.
- 3.21 A reduction in opening hours at Jubilee could impact the service's ability to offer Libraries Extra as an option in community libraries, as this currently relies on library staff phone support from Jubilee.
- 3.22 Coldean, Moulsecoomb and Whitehawk Libraries serve the most deprived areas of the city, particularly supporting families and children and those not in work. These are the highest priority libraries for the service to support and ensure sustainability. Although visitor numbers are low for these three libraries, compared to others of similar size, they are among the least costly libraries in the city to run.

- 3.23 Coldean Library has low visitor numbers compared to most other libraries, however, it is situated near a school and in a residential area with higher levels of need.
- 3.24 Moulsecoomb Library will be part of the new Moulsecoomb Hub development, with a new library, co-located with health and council services, expected to open in 2028.
- 3.25 Whitehawk Library is co-located with other council services at Whitehawk Community Hub and incorporates a toy library.
- 3.26 Children and young people in these areas face relative challenge, with a higher proportion of special educational needs and eligibility for free school meals and the highest number of NEET (not in education, employment or training) in the city. There are also higher than average levels of disability and these areas include the most economically inactive and digitally excluded residents in the city.

Medium priority – meeting the needs of local residents, serving areas with some disadvantage. These libraries were not identified for closure.

- 3.27 Hangleton, Patcham, Portslade, Saltdean and Woodingdean Libraries all show steady usage figures, particularly for families and children. They are meeting the needs of their local areas and are all either co-located or near to local amenities, supporting their longer-term sustainability. Each area has its own challenges, and the local nature of these libraries means they can target their offer to those in most need in the community.
- 3.28 Hangleton Library maintains reasonably high footfall and strong membership figures, with around twice as much children's as adult fiction issued annually.
- 3.29 Patcham Library has maintained steady footfall for the last three years and has a strong membership base of almost a quarter of the ward's total residents. The building is co-located with a community centre and is one of two libraries in the ward, with Hollingbury Library one mile away.
- 3.30 Portslade Library is a busy community library and is co-located with the South Portslade Family Hub, close to the local GP practice.
- 3.31 Saltdean Library was refurbished as part of the wider Saltdean Lido development and reopened in March 2024. Footfall at the branch is increasing since this investment, it is now the city's busiest community library.
- 3.32 Woodingdean Library is co-located with Woodingdean Medical Centre with schools adjacent and nearby.
- 3.33 These libraries serve a high number of families, children and young people, providing a safe and free community space and access to paper and digital

resources close to homes and schools. There are high numbers of Adult Social Care clients and relatively high number of NEET young people. Older people are represented in these areas, particularly Woodingdean, with a higher than average risk of digital exclusion.

Lower priority – lower demand or need for services in these areas; these libraries are considered for closure.

- 3.34 Rottingdean Library is based in the Grange building, alongside the Heritage Society, cafe and gardens. The library maintains good footfall, however, it is the most proportionally expensive community library in the city to run due to its location within a Grade II listed building and the associated maintenance costs.
- 3.35 Rottingdean Library is within two miles of Saltdean Library, with good transport links and high car ownership in the area. Many customers already use both libraries and there is less evidence of deprivation in this area. By reducing from two to one library in this area, considerable savings can be achieved with minimal impact on residents.
- 3.36 The Needs and Use Analysis suggests that residents in the ward are at a low risk of deprivation. Nearly a third of this ward are over 65 but are the least likely in the city to be in receipt of Pension Credit, and residents are at a relatively low risk of digital exclusion.
- 3.37 Hollingbury and Westdene Libraries are the least used libraries in the city, based in areas with good access to alternative libraries, and some of the lowest indicators of deprivation in the city.
- 3.38 Hollingbury Library, based within Old Boat Corner Community Centre, has the lowest footfall of all branches. The cost of operating the library room within the community centre is proportionally high when considering its usage.
- 3.39 Westdene Library has one of the smallest footprints and is co-located with Westdene Primary School.
- 3.40 While at ward level, residents live at relatively low risk of deprivation, with lower than average receipt of benefits and high car ownership, there are pockets of higher deprivation that should be acknowledged close to Hollingbury Library, with children and families in need of support.
- 3.41 The ward has the lowest crime rate in the city and children here are the least likely (by a significant majority) to be in receipt of free school meals.

Proposals for closure

- 3.42 Three libraries were identified as those most appropriate for closure based on the information gathered through the Needs and Use Analysis, considering the geographic spread of libraries in the city, and the proportional cost of operating and maintaining each branch.

- 3.43 Hollingbury Library, with the lowest footfall of all branches, is one mile from neighbouring Patcham Library. Membership figures for Hollingbury are 11% of ward population, compared with Patcham's 23%. The library is one of the most expensive to run for its size and use.
- 3.44 Rottingdean Library. The ward has two libraries, with Saltdean Library less than 2 miles away and Woodingdean within 3 miles. As detailed in the Needs and Use Analysis document, residents in the ward are at low risk of deprivation (second only to Westdene). Closure of this library would have less effect on disadvantaged residents and would realise substantial savings in the cost of operating and maintaining the site.
- 3.45 Westdene Library is the second least visited in the city and is within two miles of Patcham Library. The Needs and Use Analysis indicates Westdene & Hove Park ward is the least deprived in Brighton & Hove; with low footfall and alternative options nearby, closure would have minimal impact on those most at risk of disadvantage.

Impact of the proposed changes

- 3.46 Potential impacts of changes have been identified through the Needs and Use Analysis and Equalities Impact Assessment (EIA), see appendices 1 and 2, and will be more fully explored within the public consultation.
- 3.47 Reductions in opening hours at Jubilee Library could present a disproportionate impact on students and young people. Over 2,000 visitors per day are regularly recorded at Jubilee Library during exam seasons as local GCSE, A level and university students use the study space.
- 3.48 The closure of a community library could disproportionately affect elderly and disabled residents and carers as they could be less able to travel to access physical services in an alternative venue.
- 3.49 Mitigations include considering the distance to an alternative library, considering the strength of accessible public transport in those areas and considering alternative methods of library delivery such as Libraries Extra, e-resources and Home Delivery Service.
- 3.50 A reduction in opening hours at Jubilee could impact the service's ability to offer Libraries Extra as an option in community libraries, as this currently relies on library staff phone support from Jubilee. Alternative options for delivery of this service element will be explored.
- 3.51 Further details and mitigations are considered within the Equalities Impact Assessment given at Appendix 1 and will be fully explored within the public consultation. Information gathered through the consultation period and the Needs and Use Analysis will inform the new libraries strategy from 2026, focussing resources to ensure city library services remain relevant and sustainable for all residents, especially those at risk of disadvantage.

Timeline

3.52 Below is the proposed timeline for change

3.53 Prior to the report going to Cabinet in July, all Councillors at Brighton & Hove City Council will have had the opportunity to attend a briefing session to hear about the proposals. Ward Councillors whose areas are directly impacted by proposals set out in this paper will have received direct information including the dates of any upcoming engagement activities as set out in Appendix 3.

17 July 2025	Cabinet considers report - officer recommendation to commence the public consultation into closure of 3 libraries and reduction in opening hours of Hove and Jubilee.
18 July – 10 October 2025	If approved, 12 week public consultation commences and runs until 10 October 2025
Date TBC November 2025	Special meeting of the People Overview and Scrutiny Committee
11 December 2025	Final decision taken at Cabinet on closures and changes to opening hours
January – March 2026	Staff consultation
April 2026	Library closures and reductions in opening hours implemented

3.54 Following the public consultation, all Councillors will be briefed on the responses and any final proposals will be taken to Cabinet for decision.

4. Analysis and consideration of alternative options

4.1 Over the past decade or so, Brighton & Hove Libraries has undergone significant transformation to adapt to changing community need and financial pressures. In 2013, the mobile library service was withdrawn and replaced by a more cost-effective Home Delivery Service that has maintained access for residents unable to visit library branches. Against a backdrop of national library cuts, the city retained all of its branches for the next decade, until Mile Oak library was closed in July 2023 due to low visitor numbers and high buildings costs, and staffed days at community libraries were reduced.

4.2 Despite these challenges, Brighton & Hove Libraries has embraced innovation and inclusivity. The introduction of the 'Libraries Extra' initiative has extended opening hours and improved access through a combination of staffed and unstaffed periods. In 2024 the newly refurbished Saltdean Library, based within Saltdean Lido, was opened. Part of a broader development of the listed site, the majority funder of this project was the National Lottery Heritage Fund.

- 4.3 In May 2025, council customer services were integrated with libraries. Two new help desks opened at Jubilee and Hove, operating Monday – Friday 10am-5pm, which, along with the council's telephone switchboard, are now staffed by Library Officers. With the addition of free self-help telephones and PC use across all branches, libraries are enabling more face-to-face support to access council services for those who need it most.
- 4.4 Further opportunities for colocation of council and community services are being explored, with Adult Education and Skills moving into Jubilee Library in autumn 2025 and the inclusion of a new library space in the Moulsecoomb Hub development.
- 4.5 The Needs and Use Analysis started by the service has identified key areas of the city which benefit most from access to statutory library services. Whilst savings are a driver for the changes proposed, the priority for the council is to protect services in those areas most in need, although this will necessarily mean reductions in services in other areas of the city. This can be mitigated by exploring options for delivering some aspects of library services in alternative ways. The option to suggest other ways for communities to be involved in the delivery of services is included in the public consultation survey.
- 4.6 When considering the range of proposals, the reduction in hours at Jubilee and Hove will affect the greatest number of people, due to very high footfall and engagement in these central libraries. Greater savings can be achieved in these libraries, compared to community libraries, due to the much higher staff costs per hour. Additional and alternative times for reductions in hours were considered as part of the scoping work, however, reductions in services Monday – Friday, 10am – 5pm, were not considered possible without adverse impact on the Council Help Desks.
- 4.7 There are many models for alternative provision for community libraries. The service already supports some of these in the city, which will be explored as potential mitigations for affected communities and residents. Community book collections are already in place in Hollingdean Community Centre and St Luke's Church; access to book stock can be supported in communities where a library building is no longer sustainable, and can build on relationships with other community groups and spaces, driving footfall and engaging with those who may be at risk of isolation. The Home Delivery and Equal Access Services work with a network of volunteers to deliver book and audio-book stock to residents who cannot easily leave their homes due to disability or caring responsibilities. This service is well established and can be extended to meet the needs of those residents who may be impacted by the closure of a local library building.
- 4.8 Library Authorities around the country have a wide range of delivery models, with varying levels of Local Authority involvement, including volunteer-led libraries. In East Sussex, several community libraries were transferred to local community groups at point of closure. The local authority does not retain any responsibility for the operation or provision of these spaces and they are no longer recognised by DCMS as part of the statutory library

provision, however, they still meet a need in the local community, providing a third space in their locality, access to books and opportunities for volunteering. During the consultation period, if community groups make themselves known to the service as interested in exploring alternative models, these will be examined on a case-by-case basis and could provide some further mitigations to the changes proposed.

5. Community engagement and consultation

- 5.1 The Government's Department for Culture, Media and Sport requires a public consultation period, to engage with residents, users and non-users, for any proposals to reduce or significantly change statutory library services. The process needs to be transparent, inclusive, and respectful of the community's needs and concerns. It should clearly explain the reasons for the proposed changes, including any financial, logistical, or strategic factors, and should encourage feedback and participation from all stakeholders, including library users, staff, and local partners. All feedback received and how it has been considered in the decision-making process must be documented and made available to the public. This helps build trust and demonstrates that the consultation is meaningful. After the consultation, the final decision and rationale behind it must be clearly communicated.
- 5.2 Please see appendix 3 for the public consultation plan document and timeline for a full breakdown of the community engagement work planned for the consultation period.
- 5.3 In line with the Community Engagement Framework, a consultation questionnaire will be available for 12 weeks through 'Your Voice', the online consultation service, and promoted on council web pages, social media and through partners helping to disseminate details and promote engagement. Paper copies will be available in all libraries, BHCC buildings and key places in communities potentially affected by the changes.
- 5.4 The consultation will gather information, asking respondents about why, when, where and how they use library services. Free text boxes are provided to gather alternative suggestions as to how the saving might be made by Brighton & Hove Library Services or how elements of the library service could be provided in their communities.
- 5.5 The aim is to ensure that as many service users, stakeholders, partners and non-library users are able to have their say on the proposals. A dedicated consultation email address will be available and publicised for individual enquiries.
- 5.6 A detailed and comprehensive communications plan is being developed with Communications Team colleagues. The consultation will be advertised through various communication channels including press releases, social media, posters and flyers containing a QR code to Your Voice Survey.
- 5.7 BHCC staff will be essential stakeholders in the consultation. Colleagues will be given the opportunity to give their views through several routes:

- As a resident/worker in the city they can use the Your Voice survey to comment on the impact on them and their families of potential changes
- As an expert, their views will be gathered through internal engagement exercises, to give their perspective on the potential impact on service users in the libraries they regularly work in
- As a colleague, they may be part of a formal consultation process in relation to reductions in staff numbers and changes in working rotas to meet the savings targets
- A range of support is available to all library staff, working closely with HR and line managers to ensure all colleagues are given the opportunity to input to the consultation and feel heard through the changes.

6. Financial implications

- 6.1 The net council general fund budget associated with the libraries service in 2025/26 is £4.1m, whilst the gross budget after allowing for income is £6.1m. Within this, the employee staffing element of budget is approximately £2.4m.
- 6.2 As set out in section 3 of the report, savings in 2025/26 of £0.111m were agreed at Budget Council in February 2025, and within the Medium Term Financial Strategy further savings of £0.140m have been identified for 2026/27.
- 6.3 £0.042m has been achieved through operational streamlining in 2025-26. The remaining £0.209m saving for 2025-27 must be met through reductions in library services and staff hours.
- 6.4 The reduction of opening hours at Jubilee achieves the highest saving, followed by the reduction in out of hours staff time, then the reduction in opening hours in Hove.
- 6.5 Closure of Rottingdean Library achieves the highest saving followed by Westdene and Hollingbury.
- 6.6 These savings do not include associated savings for the corporate management and maintenance of these buildings as these are not factored into the budget savings.

Proposal	saving
Reduction in opening hours at Jubilee	£65k
Reduction in out of hours staff time	£50k
Reduction in opening hours at Hove	£35k
Closure of Rottingdean Library	£25k
Closure of Westdene Library	£20k
Closure of Hollingbury Library	£15k
total	£210k

Name of finance officer consulted: Steve Williams
Date consulted (24/06/25)

7. Legal implications

- 7.1 This report seeks the approval of Cabinet to initiate a consultation process on proposals for the reduction in hours at two libraries and the closure of three community libraries. While the decision to consult is not a Key Decision, it has nonetheless been referred to this meeting of Cabinet to ensure maximum transparency.
- 7.2 Ultimately any decision to change the operation of the library service will need to be in accordance with the statutory duty in Section 7 of the Public Libraries and Museums Act 1964 for the Council as a library authority “to provide a comprehensive and efficient library service for all persons desiring to make use thereof.” The duty relates to those whose residence, place of work or study is within the Council’s area.
- 7.3 The Department of Culture Media and Sport has produced guidance entitled “Libraries as a Statutory Service” (updated 21 February 2025) which the council should take into account when considering its statutory service and in particular when proposing changes to it. This includes reference to the need to demonstrate plans to consult with local communities alongside an assessment of their needs. A “Needs and Use Analysis” is attached to the report and should be considered by the Cabinet in making its decision.
- 7.4 Given the nature of the changes proposed, it is important that a period of consultation with those potentially affected is carried out. The process being followed is considered to comply with the *Gunning*^{[11](#)} principles:
1. Proposals are at a formative stage allowing for genuine input and potential changes to the proposal prior to any final decision.
 2. Consultees need adequate information about the proposals to understand them and provide meaningful feedback, and these are set out in the report.
 3. Sufficient time must be given for consultees to review the information, formulate responses, and participate in the consultation process, in this case 12 weeks is proposed.
 4. If the matter returns to Cabinet, the report will need to demonstrate how the consultation responses have been conscientiously considered before making a final decision.
- 7.5 The Equality Act 2010 states that public bodies must have “due regard” to a variety of equalities objectives, including the need to eliminate discrimination and advance equality of opportunity and foster good relations between those who share a “protected characteristic” and those who do not (Equality Act 2010, Section 149). An equalities impact assessment is attached to this report which should be taken into account by the Cabinet when making this decision. The assessment will be updated to take account of any impacts identified through the consultation process and will be reviewed prior to any final decision being taken at a further meeting of Cabinet.

Name of legal officer consulted: Allan Wells
Date consulted (03/07/25)

8. Risk implications

- 8.1 Risks associated with the proposals have been identified, will be monitored and mitigated against where possible. These and any further risks identified through the consultation process will be presented with mitigations in the Cabinet report in December.
- 8.2 Risk of adverse impact on residents and customers in BHCC communities which rely on the libraries affected. A full range of equalities considerations are addressed in the Equality Impact Assessment (appendix 1), which will be updated with data gathered through the consultation process.
- 8.3 If changes are made to the library service, staff will then be part of a consultation. Risks which could impact on staff will be addressed in a separate Equality Impact Assessment and a full support package as part of the staff restructure consultation period. The proposed changes are part of a wider sustainability plan for libraries which included changes to management structure and some reductions in staffing last year. The integration of other services has also impacted staff and added to the levels of change being managed by the team. This level of change presents the risk of potential for industrial unrest. Colleagues will be engaged in the consultation process as key stakeholders and experts and all staff will be supported through the usual HR processes and line management.
- 8.4 There is a risk that the full savings identified will not be achieved in this financial year due to the change in timeline. Any reduction to the proposed changes or any delay in implementation will further risk the achievement of the full saving identified for 2026-27. Any savings not achieved will impact the Families, Children and Wellbeing directorate as an in-year budget pressure, potentially impacting other BHCC services.
- 8.5 With any change to statutory services, residents have the option to challenge the decision if it can be demonstrated that processes have not been followed appropriately, with transparency, or that statutory services are being denied to residents. This presents a potential risk of formal complaint, legal challenge and judicial review. By following the correct processes and engaging in meaningful consultation with transparency and openness, this risk can be mitigated.

9. Equalities implications

- 9.1 BHCC has a statutory duty to provide a comprehensive library service to those who live, work and study in the city. Reductions in this statutory service are likely to disproportionately affect more vulnerable groups in the city, as their options for library use will be reduced.
- 9.2 An Equalities Impact Assessment has been completed for the consultation period and will be extended with additional information gathered during consultation. Risks of impact on particular groups and some mitigating actions have been identified, please see appendix 1.

Mitigations include but are not limited to:

- Efforts made to communicate directly with a wide range of community services and networks to gather a wide range of responses
- Monitoring the impact through data collection enables the service to focus remaining resources in areas of need
- Communicating and advertising Libraries Extra and the Home Delivery Service to affected communities to support those who may be impacted by changes and unable to travel to another library

- 9.3 The report above and the Equalities Impact Assessment explore in some detail the potential implications for some communities (geographic and identity) of the proposed reduction in library service. An element of the public consultation is to run a survey on the council's YourVoice engagement portal – this will seek a range of views regarding the proposals but also seek equalities monitoring data from responders. This will allow for a greater level of analysis of the impact of the proposals and will inform any final recommendations.

10. Sustainability implications

- 10.1 The proposals above are contributing to the long-term strategic planning for more sustainable library services for city residents, employees and visitors. The statutory needs of the city will be more securely met with a streamlined service which focuses on the areas of most need. Staff will be more secure, working within a sustainable structure which offers opportunities for progression and role satisfaction, providing excellent customer services in key areas of the city.
- 10.2 Travel is kept to a minimum, but, where necessary, active and sustainable travel is prioritised. The proposals retain 10 libraries across the city, in areas which are accessible by public transport, and many of which are co-located with or close to other community assets such as schools, shops, Family Hubs and GP surgeries. Online services support those who wish to travel less, with online ordering and loan renewal as well as access to e-resources.
- 10.3 BHCC is exploring ways to make best use of resources, including buildings. The co-location of libraries with other community spaces is part of the long-term sustainability strategy, including a new library in the Moulsecoomb Hub in 2027-28, co-location of Council Help Desks and Adult Education & Skills at Jubilee from 2025. The service is actively seeking other opportunities to share spaces in communities, to both reduce running costs of libraries and improve access for residents.

11. Other Implications

Public health implications:

- 11.1 The Needs and Use Analysis has identified some areas of focus, particularly families and children and older people; by building our understanding of who is using the library, the service can work with colleagues in other services, such as Public Health, to support residents within their communities.

- 11.2 Public health implications will be explored further during and after the public consultation and reported on in the Cabinet report later in the year.

12. Conclusion

- 12.1 Cabinet are asked to approve the recommendations made above. The proposals are to enable a sustainable and affordable library service across the city, particularly focused on serving those in most need.

Supporting Documentation

Appendices

1. Equalities Impact Assessment for the proposed public consultation
2. Brighton & Hove Libraries initial Needs and Use Analysis – part 1
3. Engagement plan for the proposed public consultation