

Brighton & Hove City Council

Leader of the Council

Subject: Use of Housing Revenue Account voids as Temporary Accommodation

Date of Decision: 14 January 2026

Report of: Corporate Director of Homes & Adult Social Care

Lead Officer: Name: Genette Laws, Corporate Director for Homes & Adult Social Care

Contact Officer: Name: Harry Williams, Director of Housing People Services

Email: harry.williams@brighton-hove.gov.uk

Ward(s) affected: All Wards

Key Decision: Yes

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

For general release

Note: Reason for urgency

Due to the special circumstances outlined below, and in accordance with Regulation 10 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012, compliance with the requirement to provide 28 days' notice has not been possible. The urgency of the matter has been agreed upon by the Chair of the relevant Overview and Scrutiny, and it is deemed necessary to consider this item without delay, due to the urgent need to address significant financial pressures on the council and to address the challenges households are facing under the current arrangements.

1. Purpose of the report and policy context

- 1.1 The purpose of this report is to seek the approval of the Leader to authorise the interim use of Housing Revenue Account voids as Temporary Accommodation between 19 January and 1 May.
- 1.2 The proposed approach during this interim period is expected to achieve £0.757m (with a full year effect) of savings to help address an anticipated in-year overspend of £4.8 million on nightly paid Temporary Accommodation. This total covers immediate financial savings in the year 2025 /26 and the ongoing consequential savings for 2026/2027.
- 1.3 Therefore, given the scale of the project savings, the decision is presented for Leader approval in recognition of the policy's significance and potential

legal and financial risks, notwithstanding the opportunity to provide better quality temporary housing to homeless households.

- 1.4 It is also important to note the consequence is delay for some households who are applying to transfer or those currently bidding under the choice based letting scheme. The exact amount of delay will depend on the circumstances of each impacted household, but it will be no less than 3.5 months, which is the duration of the interim position.

2. Recommendations

- 2.1 The Leader agrees to the interim use of all Housing Revenue Account voids as Temporary Accommodation between 19 January and 1 May.
- 2.2 The Leader agrees to adopt the draft policy on the use of Housing Revenue Account Void Properties as Temporary Accommodation as set out in Appendix 1.
- 2.3 The Leader delegates authority to Corporate Director for Homes & Adult Social Care to take all necessary steps to implement the policy as set out in Appendix 1.
- 2.4 The Leader delegates authority to Corporate Director for Homes & Adult Social Care to begin consultation on the policy as set out in Appendix 1, which will inform a review of the policy at the conclusion of the interim position and will inform any further report to Cabinet seeking possible extension or changes to the interim period or policy, for a limited duration.

3. Context and background information

- 3.1 Brighton & Hove is facing a deepening homelessness crisis, with rising numbers of people experiencing homelessness, increasing levels of support need, and escalating financial pressures on the local authority.
- 3.2 According to Shelter's 2024 analysis, approximately 1 in every 77 residents in the city are homeless - a total of 3,580 people, or 1.3% of the population. Further, out of the 3,580 people, 1,411 are estimated to be children - nearly 40% of the total homeless population.
- 3.3 The council has a legal duty to provide temporary accommodation to households where it has reason to believe they are eligible, homeless, and may have a priority need, while taking reasonable steps to relieve their homelessness. In addition, the council is legally required to provide accommodation to households for whom it has accepted a full housing duty.
- 3.4 The council's use of Temporary Accommodation is increasing, with 2,150 households placed in such accommodation at the end of November 2025. This includes a growing number of single adults, who make up over 20% of all households in Temporary Accommodation - a proportion significantly higher than the national average and reflective of the city's unique

demographic and housing pressures. This reflects the high levels of vulnerability within the city. If the proposal is agreed, the focus will remain on households with children, but single households will be accommodated where there are demonstrated health or educational benefits, in line with the findings of the Equality Impact Assessment, as set out in Appendix 2.

- 3.5 The financial cost of providing temporary accommodation is significant. The council has allocated £28 million for this purpose in 2025/26. However, current projections indicate an overspend of £4.8 million this year, driven by an increasing reliance on costly nightly-paid temporary accommodation to meet statutory duties. The number of nightly-paid units has risen sharply – from 114 in 2022 to 520 by November 2025.
- 3.6 Not addressing this financial pressure places essential services at risk, such as discretionary services which provide broader welfare support to people experiencing homelessness and are essential to wellbeing of individuals and communities. It may also mean a reduction in capacity and provision for statutory services.
- 3.7 For some, TA can offer stability, especially when they are unlikely to be moved and can form an attachment to the property, allowing them to put down roots. The issue is not necessarily TA itself, but rather the nature of certain arrangements such as nightly paid Temporary Accommodation - where accommodation is provided on nightly licenses. These often lack the sense of ownership and security that comes with formal tenancy, leaving households uncertain about their future and less able to engage with their surroundings.
- 3.8 TA with a formal tenancy agreement offers a significant advantage: residents have a protected right to remain, which fosters stability and a stronger sense of home.
- 3.9 As stated, out of the 3,580 people experiencing homelessness in June 2024 according to Shelter, 1,411 were estimated to be children. National research is beginning to show the long-term developmental impacts of prolonged stays in TA, particularly in the most unsettled forms of accommodation, such as where accommodation is nightly licensed.

4. Using Housing Revenue Account Void Properties as Temporary Accommodation

- 4.1 The policy set out in Appendix 1 sets out a time-limited interim scheme for the use of council-owned Housing Revenue Account void properties as Temporary Accommodation. The policy aligns with the Council Plan, Housing Strategy 2024–2029, and the Homelessness & Rough Sleeping Strategy 2025–2030, and is designed to be transparent, fair, and responsive to the city's most urgent housing needs.
- 4.2 The initiative responds to acute pressures on the city's homelessness services, aiming to maximise in-city placements, reduce reliance on costly nightly paid Temporary Accommodation, and improve outcomes for

households experiencing homelessness. This is considered necessary while other initiatives bring in more capacity to the system, such as the commitment to purchasing 200 homes to use as Temporary Accommodation, from an initial investment of £10m.

- 4.3 It is proposed that an interim scheme is run between 19 January to 1 May 2026. During this period, eligible HRA void properties will be allocated for use as Temporary Accommodation for homeless households owed duties under Part VII of the Housing Act 1996. Seniors housing, extra care, mobility/adapted properties are excluded from the policy, with discretion for allocation on a secure basis if exceptional circumstances can be demonstrated.
- 4.4 The policy sets out how the allocation of voids will be prioritised. In first instance families, households currently placed outside the city, and those in nightly paid Temporary Accommodation will be prioritised.
- 4.5 Allocations of voids will be made via a Lettings Panel, comprising senior managers from Tenancy Services, Temporary Accommodation, Housing Allocations, Rehousing, Housing Operations, and Empty Homes. The Panel will, meet regularly to apply the prioritisation matrix, decide on exceptions (as referred to below), and oversee offers of accommodation.
- 4.6 All properties used as Temporary Accommodation must meet the council's lettable standard for safety, compliance, cleanliness, and functionality. This includes gas/electrical safety, secure locks, suitable flooring, and thorough cleaning

Policy Exemptions

- 4.7 While the interim policy aims to maximise the use of HRA void properties as TA for homeless households, it recognises that certain circumstances require individual consideration. Exemptions are therefore built into the policy to ensure that the council can respond appropriately to complex issues.
- 4.8 As stated, unless needed in exceptional circumstances the following property types are exempt from the interim policy:
- **Sheltered Housing:** Properties designated for seniors are excluded due to their specialist nature and high demand.
 - **Mobility-Adapted Properties:** Homes adapted for accessibility are excluded to preserve availability for those with specific needs.
 - **Housing Association / Registered Social Landlord Properties:** Properties managed by partners within the council's allocation scheme are not included. On average, approximately one-quarter of homes allocated to households on the housing register are Housing Association properties.

4.9 In addition, the council retains a discretion to allocate voids to households from the housing register, and existing secure council tenants where exceptional circumstances and needs can be demonstrated in the following categories:

- Where an allocation would enable another council property to become available to use as Temporary Accommodation. For example, a Priority Transfer or Large Panel System (LPS) block property.
- Where there is a serious safeguarding risk or urgent medical need and allocating an existing council tenant, a new property is deemed the only way to safeguard.
- Where there is a household with assessed care and support need in residential or alternative care whose needs could be met within general needs accommodation.
- Any other situation where a compelling case can be demonstrated by a household on the housing register will be considered individually by the Lettings Panel.

4.10 Exceptions will be considered on a case-by-case basis by a dedicated panel. This panel will include relevant service managers, and oversee letting decisions to ensure consistency, fairness and transparency, with records maintained for audit purposes.

Monitoring and review

4.11 The interim policy will be closely monitored, with key performance indicators (as set out on page 8 of Appendix 1) including the number of voids allocated, exceptions applied, and outcomes for households.

4.12 Formal consultation with stakeholders, including tenants, households on the council's housing register, and community representatives will commence during the interim period to inform any future policy development or extension beyond 1 May.

4.13 At the end of the interim period, the policy will be reviewed and HRA void properties will revert to standard allocation processes unless further approval is sought from the council's Cabinet.

5. Analysis and consideration of alternative options

Recommended option: Interim Use of Council-Owned HRA Voids as Temporary Accommodation

5.1 The **recommended option** is the temporary use of council-owned Housing Revenue Account (HRA) void properties as TA for homeless households as set out in this report. Allowing for the exemptions from the policy described above it is estimated that this will mean that in the region of 80 Council voids

can be offered for temporary accommodation over the interim period of the policy. This option directly addresses the urgent need for affordable, good-quality accommodation within the city. This option allows the council to maximise in-city Temporary Accommodation placements, reduce reliance on expensive nightly-paid arrangements, and offer greater stability and wellbeing for affected households.

- 5.2 As set out in the Equalities Impact assessment at Appendix 2 the allocation of voids to the households to be prioritised under the interim policy brings significant social benefits to households who would otherwise be placed in less suitable more expensive temporary accommodation lacking any security, and sometimes of necessity outside of their communities.
- 5.3 This option aligns with the council's strategic priorities. Lettings are subject to robust oversight by a dedicated panel. The temporary use is time-limited, allowing for careful monitoring and review before any longer-term commitment is made.
- 5.4 It is recognised that this option will temporarily reduce the availability of council homes for households on the housing register, most likely by a minimum of the period of the implementation of the policy. However, Housing Association properties and those excluded under paragraph 4.8 will remain available during this period.
- 5.5 It is also recognised that this approach will cause delays for applicants seeking a transfer or currently bidding through the choice-based letting scheme. The length of the delay will vary depending on individual circumstances, but it will be at least 3.5 months – the duration of the interim position. Where exceptional circumstances can be demonstrated the Council has retained discretion to consider on a case-by-case basis the allocation of voids from the waiting list.

Alternative option: Making Direct Offers of Social Housing to households in Temporary Accommodation

- 5.6 Rather than allocating council-owned HRA void properties such as Temporary Accommodation (TA), the council could consider making direct offers of permanent or settled accommodation to eligible homeless households from the housing register as soon as suitable properties become available. This approach would bypass the need for interim TA placements, aiming to move households directly into long-term homes.
- 5.7 This approach would directly reduce the overall number of households living in Temporary Accommodation and minimise the negative impacts associated with prolonged stays in TA, particularly for children and vulnerable adults. Households would also benefit from greater stability and wellbeing by moving straight into settled accommodation, avoiding the uncertainty of temporary arrangements

- 5.8 The council's Housing Allocations Policy is based on a Choice Based Lettings (CBL) system, which allows households to bid for available properties. Direct offers are only permitted in exceptional circumstances, such as urgent medical or safeguarding needs, or where statutory duties require it.
- 5.9 While direct offers are appropriate and necessary in proportionate application, widespread use would go beyond what is considered exceptional and is not permitted within the current Housing Allocations Policy. Implementing this approach at scale would undermine the transparency and fairness of the allocations process and could be subject to challenge.
- 5.10 Given the limited supply of suitable permanent accommodation and the growing number of households living in nightly paid TA, this option would not have a significant enough impact on reducing the associated costs or addressing the projected overspend. Most households would still require interim accommodation while waiting for a suitable direct offer.
- 5.11 For these reasons, this option is **not recommended**. A more impactful policy is required to achieve financial sustainability and address the urgent pressures facing the council.

6. Community engagement and consultation

- 6.1 Relevant internal stakeholders, including the Cabinet Member for Housing, have been kept informed of the increasing cost of Temporary Accommodation, the anticipated in-year overspend, and the intended interim approach to the use of HRA voids. Broader community engagement will be undertaken as part of the formal consultation process.
- 6.2 Public consultation has not taken place due to the interim nature of the policy and the urgent need to achieve significant financial savings for the council. As highlighted in this report, the council is facing acute financial pressures, including a projected £4.8 million overspend on nightly paid Temporary Accommodation, which necessitates immediate action to reduce expenditure and safeguard essential services. Therefore, the interim policy has been introduced without prior public consultation to enable the council to respond swiftly to these financial challenges. As stated, formal consultation with stakeholders, including tenants, households on the council's housing register, and community representatives, will commence during the interim period to inform any future policy development or extension.

7. Financial implications

- 7.1 The projected savings to the General Fund from making full use of all HRA void properties available between 19th January 2026 and 1st May 2026 amount to £0.092m for 2025/26 and £0.665m 2026/27, £0.757m per annum

in total. These savings are based on reducing reliance on emergency and out-of-area placements for temporary accommodation. Increasing the number of Council-owned temporary accommodation units by 80 is expected to have an annual cost of £0.468m on the Housing Revenue Account (HRA) allowing for necessary repairs and maintenance, of which approximately £0.120m will be a pressure above the level anticipated through voids materialising as part of the Council's regular Housing Allocations Policy.

Name of finance officer consulted: Sophie Warburton, Head of Finance for Homes & Adult Social Care

Date consulted: 06/01/2026

8. Legal implications

- 8.1 The report makes clear this is anticipated to be a temporary measure to address an acute lack of affordable temporary accommodation within the city, at a time of a significant increase in homeless applications for the year 2025/2026, while other planned measures come on stream.
- 8.2 The report sets out the exceptional pressures being experienced by the Council to find sufficient suitable Temporary Accommodation at reasonable cost, and the impact on the Council's overall budget and ability to meet a range of statutory duties including the duty to prevent homelessness if urgent measures are not taken in the exceptional circumstances described. In considering options for the use of the void homes, the Council is entitled to consider where assets can have the greatest impact, and there is no legal bar to the use of HRA council voids for Temporary Accommodation.
- 8.3 Where the Council has a statutory obligation to provide accommodation pursuant to obligations under Part VII Housing Act 1989, the proposed time limited interim policy for the allocation of HRA voids legitimately aims to both assist the Council to meet statutory duties in relation to homelessness in a manner which is more effective in meeting the needs of those in need of accommodation, and mitigate the excessive spend on Temporary Accommodation.
- 8.4 The policy sets out the considerations for the allocation of HRA council voids and specifies exemptions to the use of voids for temporary accommodation, including the retention of a discretion to allocate voids from the housing register in exceptional cases.
- 8.5 The social benefits of the use of council voids for temporary accommodation, especially in relation to families with children, are a relevant consideration. It is, however, recognised that the temporary restriction of allocation of council voids to use as temporary accommodation will impact on those people who are on the waiting list for council accommodation or eligible for transfers, and who are not otherwise eligible to bid for voids over the specified period within the exemptions specified in the policy. The

Equality Impact Assessment at Appendix 2 describes the anticipated impact in this respect.

- 8.6 HRA voids offered as temporary accommodation will be the subject of non-secure tenancies. This would require possession proceedings should the Council require the return of the property and so offers a greater degree of security to eligible households than temporary accommodation by way of licenses.
- 8.7 Given the extent of the financial challenges faced by the council commissioning sufficient temporary accommodation to meet statutory obligations, and the complex needs of the homeless population requiring temporary accommodation, the adoption of this temporary measure is considered proportionate to the challenge faced by the Council. The policy will be the subject of ongoing review as to the application of the policy, with provision for consultation.

Name of lawyer consulted: Natasha Watson, Head of Legal – Litigation & Safeguarding

Date consulted: 09/01/2026

9. Risk implications

- 9.1 The proposed interim use council-owned HRA void properties as Temporary Accommodation carries several key risks that could influence the achievement of council objectives.
- 9.2 Firstly, if the recommendations are not agreed, the council will remain reliant on costly nightly-paid Temporary Accommodation, exacerbating financial pressures and potentially impacting the sustainability of essential services.
- 9.3 Letting voids as TA will temporarily reduce the availability of general needs housing, increasing waiting times for households on the housing register, impacting on the council's ability to address the housing needs of residents not experiencing homelessness.
- 9.4 An increased use of HRA voids as Temporary Accommodation may also affect community cohesion and create unsettled communities where lettings are more prevalent.
- 9.5 To mitigate these risks, the council will implement robust monitoring and oversight, engage stakeholders throughout the process, and ensure all properties meet required standards. The proposed interim scheme is time-limited, with a formal review and reversion to standard allocation processes unless further approval is sought. An updated Equality Impact Assessment will inform decision-making and help ensure fair treatment of all affected groups

10. Equalities implications

- 10.1 An initial Equality Impact Assessment (EIA) has been undertaken to assess the time-limited period for the use of HRA voids as Temporary Accommodation. A further EIA will be completed following formal consultation, and provided should an extension of the interim period beyond 1 May be proposed.
- 10.2 The analysis demonstrates that the interim period will have material, and in many cases positive, differential impacts for a range of protected groups and intersecting cohorts. These include:
- Children and young people, and families
 - Disabled people, including neurodivergent people and those with non-visible disabilities
 - Ethnicity, race and ethnic heritage, including Black and Racially Minoritised (BRM) households
 - Religion or belief
 - Sex and gender identity, including women and TNBI people
 - Pregnancy, maternity and early parenthood
 - Migrants, asylum seekers and refugees
 - Carers and care-experienced people
 - Survivors of domestic and sexual abuse
 - Human rights considerations
- 10.3 Many households experience multiple, overlapping disadvantages. To address this, the Lettings Panel will record an intersectional rationale for each decision, ensuring that overlapping needs are considered in prioritisation and that any adjustments are clearly documented. Monthly dashboards will monitor for disparities across characteristics and intersections, enabling targeted action where required.
- 10.4 To mitigate risks and ensure the interim approach remains responsive to equalities considerations, the EIA proposes two key actions:
- Undertake formal consultation on the interim policy to capture the experiences and impacts on households affected, including those placed in Temporary Accommodation and applicants on the housing register who may experience delays or changes in offers.
 - Monitor lettings decisions made by the panel to capture information on groups benefiting from or impacted by the interim approach, supporting any necessary changes to the policy and informing decisions at the end of the interim period.
- 10.5 The EIA recommends proceeding with caution. The interim scheme is time-limited and subject to robust governance, including weekly monitoring and case-by-case exemptions. Evidence indicates strong positive impacts for families with children, disabled households, survivors of domestic abuse, and households currently placed out of area, through improved quality and stability of accommodation.

- 10.6 However, there are also risks of longer waits for some groups on the housing register during the interim period, and gaps in structured equality data that require active management.
- 10.7 Proceeding with caution is justified given the urgent need to reduce expenditure on nightly-paid accommodation and to improve in-city stability for households. The proposed actions provide a proportionate and practical mitigation framework for the interim period.

11. Sustainability implications

- 11.1 Using council-owned HRA voids as Temporary Accommodation will reduce travel emissions by keeping households within Brighton & Hove, close to schools, healthcare, and support networks. This supports social cohesion and local economic resilience. Any increased resource use for property refurbishment will be mitigated by applying council sustainability and energy efficiency standards.

12. Health and Wellbeing Implications:

- 12.1 The proposed use of council-owned HRA voids as Temporary Accommodation is expected to deliver significant health and wellbeing benefits for homeless households. Households currently placed in nightly paid TA often experience poorer quality accommodation, with less security and stability due to the nature of licence agreements. By contrast, HRA TA placements will be provided in properties that meet the council's lettable standard, offering improved safety, cleanliness, and functionality.
- 12.2 Although placements remain temporary and households are on non-secure tenancies, this approach provides a greater level of stability and the opportunity to remain within established support networks, schools, and healthcare services. Evidence shows that higher quality, more stable accommodation has a positive impact on both mental and physical health, particularly for children and vulnerable adults. This policy supports the council's commitment to improving health and wellbeing and reducing inequalities across the city.

Other Implications

13. Procurement implications

- 13.1 The council will progress with the conversion of Empty Properties owned by the Housing Revenue Account for use as Temporary Accommodation during the interim period. This process will include comprehensive refurbishment of each property, ensuring that floor coverings are installed where they are absent or do not meet the required standards
- 13.2 In recognition of the urgency of this initiative, refurbishment works will proceed during the interim period under the existing compliant framework.

However, aligned to the Procurement Forward Plan for 2026/27, which will be brought to Cabinet later this financial year, will request Cabinet's approval to procure further contractor capacity, to ensure essential works can be delivered effectively, supporting the immediate need to increase the supply of suitable Temporary Accommodation without disruption to ongoing service delivery.

Name of procurement officer consulted: Jason Duncombe, Interim Head of Procurement

Date consulted: 09/01/2026

13. Crime & disorder implications:

- 13.3 The proposed use of HRA voids as Temporary Accommodation supports this duty by providing better quality, more stable housing for households who might otherwise be placed in poorer standard, nightly paid TA. Improved accommodation and greater stability can help reduce the risk factors associated with crime, anti-social behaviour, substance misuse, and re-offending.
- 13.4 Moreover, by enabling households to remain within their local communities and established support networks, the policy promotes social cohesion and reduces the disruption that can contribute to community safety concerns.
- 13.5 In summary, no negative impacts on crime and disorder are anticipated. The council will continue to work closely with community safety partners and monitor outcomes to ensure any emerging risks are identified and addressed.

14. Conclusion

- 14.1 Like many other Local Authorities across the country, Brighton & Hove City Council is facing an unprecedented homelessness crisis, with rising demand for Temporary Accommodation and significant financial pressures on the council. The proposed interim scheme to use council-owned Housing Revenue Account void properties as Temporary Accommodation offers a targeted, time-limited response that maximises in-city placements, improves the quality and stability of accommodation for homeless households, and directly addresses a projected £4.8 million overspend on nightly paid TA.
- 14.2 This approach is grounded in statutory duties and aligns with the Council Plan, Housing Strategy, and Homelessness & Rough Sleeping Strategy. It is designed to be transparent, fair and responsive to the city's most urgent housing needs. While the interim scheme will temporarily reduce the availability of general needs housing for a short period, mitigations are in place to minimise negative impacts and ensure the council continues to meet its wider objectives.
- 14.3 Alternative options, such as making direct offers of permanent accommodation, are constrained by policy and supply, and would not deliver

the scale of impact required. The interim scheme represents the most effective and sustainable option to address immediate pressures, improve outcomes for vulnerable households, and safeguard essential services.

- 14.4 Approval of the recommendations will enable the council to better address the current crisis, while ensuring that any lessons learned inform future policy and practice.

Supporting Documentation

1. Appendices

1. **Appendix 1:** Draft Policy on Use of Housing Revenue Account Void Properties as Temporary Accommodation
2. **Appendix 2:** Initial Equality Impact Assessment