

Brighton & Hove City Council

Overview & Scrutiny

Agenda Item 40

Subject: Large Panel Systems Building and Estates Renewal - S105, Rehousing Policy and Leaseholder Offer Consultation Programme

Date of meeting: 28th January 2026

Report of: Cabinet Member for Housing

Contact Officer: Darren Levy, Interim Director of Housing Regeneration

Email: Darren.levy@brighton-hove.gov.uk

Ward(s) affected: All

Key Decision: No

For general release

1. Purpose of the report and policy context

1.1 This report seeks Overview & Scrutiny's feedback in addition to the public programme of consultation being undertaken in relation to the Large Panel Systems (LPS) Building and Estates Renewal project. The consultation covers:

- Section 105 (Housing Act 1985) requirements
- The Council's Rehousing Policy and draft Local Lettings Plan in accordance with the Council's Allocations Policy 2025
- The Leaseholder Offer for affected properties.

1.2 This will allow feedback and comments from Overview and Scrutiny to be included in the report back to Cabinet 19th March 2026.

1.3 It does not cover consultation with other relevant parties such as neighbours. These will be conducted as part of the usual consultation processes undertaken by the Place team. The consultation carried out so far relates to those directly impacted. If Cabinet subsequently agrees to demolition in principle, then ongoing consultation will include neighbouring properties and businesses.

1.4 During the consultation programme an additional initiative has been proposed to support secure tenants who may have wanted to exercise their Right to Buy, to purchase in the open market instead. This proposal will be subject to a Cabinet decision in March and it is therefore included in this report for feedback and comment.

- 1.5 The programme aligns with the Council's Corporate Plan priorities to deliver safe, sustainable housing and regenerate key estates to improve quality of life and reduce inequalities.

2. Recommendations

- 2.1 Overview & Scrutiny provide responses to the s105 survey questions, as appropriate, so these can be included in the consultation report back to Cabinet on 19th March 2026.
- 2.2 Overview and Scrutiny to provide feedback and comment on the Rehousing Policy and draft Local Lettings Plan, so these can be included in the consultation report back to Cabinet on 19th March 2026.
- 2.3 Overview & Scrutiny to provide comment and feedback on potential options for enhancing the leasehold and tenant offer that they would like Cabinet to consider, so these can be included in the consultation report back to Cabinet on 19th March 2026.

3. Context and background information

- 3.1 An options appraisal of the Council's Large Panel Systems (LPS) blocks was initiated in November 2024, following structural surveys identifying structural and sustainability issues earlier that year. A range of mitigating measures were taken and are ongoing, to ensure the buildings remain safe to live in while the long-term future of the buildings is decided.
- 3.2 The outcomes of the options appraisal, together with the associated recommendations and a summary of proposed mitigating actions, were presented to Cabinet on 17 July 2025 and are available for viewing within the background documents appended to this report.
- 3.3 The three options that were explored as part of the options appraisal were: strengthening, strengthening and refurbishment, and demolition and regeneration.
- 3.4 Cabinet approved in principle recommendations regarding the preferred option to regenerate all the LPS buildings, inclusive of demolition of the existing blocks and creation of new housing on the sites.
- 3.5 The options of strengthening, strengthening and refurbishment were discounted due to costs which are unviable for the Council alongside its other stock investment commitments, and secondly due to longevity. Any strengthening solution would require further review and possibly further strengthening work within a maximum of 20 years.
- 3.6 This decision triggered statutory consultation duties including under Section 105 of the Housing Act 1985.
- 3.7 Section 105 of the Housing Act 1985 requires Councils to consult secure tenants on matters of housing management that substantially affect them,

including proposals for demolition and regeneration. Given the significance of the decision and in line with the principle of consultation, the Council has decided to also include existing Temporary Accommodation households, Seaside Homes households, leaseholders and private sector tenants of leaseholders, as well as residents on the Housing register, and within the consultation. Subject to further decisions by Cabinet to take forward any development, further external consultation will be carried out to cover wider matters once future development and demolition plans are finalised.

- 3.8 In carrying out the options appraisal, a further survey of the blocks was carried out by Ridge. This is detailed in the July 25 Cabinet papers, which identified that the Council would need to carry out either strengthening works or vacate the buildings within a likely period of 5 years. The scale of works required to strengthen and refurbish the buildings would also likely require empty buildings should these options be progressed.
- 3.9 In order to facilitate a rehousing programme across the 8 blocks, at 17th July 2025 meeting, Cabinet approved recommendations for all LPS buildings, “for officers to develop and consult upon a Rehousing Policy and draft Local Lettings Plan which would apply to the permanent rehousing of all secure council tenants and those who are accommodated by the Council under a statutory duty and who are affected by the regeneration schemes”....”and which incorporates the proposed tenant offer described in the report, including in relation to the priority of existing secure council tenants”....”for allocation to the new housing on the site, in keeping with the intention to offer right to return”.
- 3.10 At the 17th July meeting Cabinet also noted the recommendation across all LPS buildings with regard to “the support and offer to leaseholders outlined in the report and the intention to engage with leaseholders further regarding the development of proposals”. This related to the current buyback programme of leaseholder properties, as approved at 20th March 2025 Cabinet and what further the Council could do to support and/or encourage leaseholders to sell their homes back to the Council as well as to seek views on any other potential options that leaseholders would like the Council to consider.
- 3.11 Two workshops were held with the Resident Advisory Groups from all three sites were involved in the development/co-design of the consultation survey.
- 3.12 Given the consultation requirements outlined above in relation to consultation duties, the Rehousing policy and draft Local Lettings Plan, and the leaseholder offer, we initiated a programme of consultation on 13th October which closed on 12th January. The feedback from this consultation will be included in a report back to Cabinet on 19th March 2026.
- 3.13 Consultation was carried out through an online Yourvoice survey, see appendix 1 together with a range of in person opportunities to seek feedback. A full report on the consultation programme and feedback will form the basis of a report to Cabinet on 19th March 2026.

- 3.14 It is intended to include any feedback and comments from Overview and Scrutiny within the 19th March 2026 Cabinet paper.
- 3.15 Feedback and views are being sought from Overview and Scrutiny in response to the Yourvoice survey questionnaire in Appendix 1.
- 3.16 Section 1 of Appendix 1 outlines area specific questions about priorities for the sites as well as for views regarding the rationale behind Cabinet's in-principle decision to progress with exploring the option of regeneration, inclusive of demolition and provision of new housing.
- 3.17 Section 2 of Appendix 1 seeks views on the Rehousing Policy and draft Local Lettings Plan, which are attached as Appendix 2.
- 3.18 The council's Allocations Policy allows for the creation of a Local Lettings Plan in regeneration scenarios. This will facilitate the rehousing of residents from LPS buildings. Key elements include prioritising LPS secure tenants for bidding on the choice-based lettings system, making like-for-like offers to secure tenants where appropriate (regardless of housing need, unless overcrowded), to assist under occupiers to take advantage of incentives to downsize and being able to make direct offers of accommodation to LPS residents in exceptional circumstances in line with the Council's Allocations Policy.
- 3.19 In addition, we are exploring options to introduce a pilot Home Ownership Pact Scheme for tenants living in the eight LPS blocks, enabling tenants to own homes in the private sector as an alternative to the Right to Buy (RTB). This scheme will provide another rehousing option for tenants and enable households with the Right to Buy with an alternative to purchasing council housing stock. This ensures that the council can retain council properties for those who most need them, while enabling people to purchase a home if they wish to. Grants will support ownership paths such as outright purchase and shared ownership. It is proposed that grant will be offered at £40,000 for one bedroom and £45,000 for two-bedroom properties. These exceed the current maximum RTB discount on offer and will support a deposit for a purchase. The pilot scheme will last a year with a proposed initial allocation of £0.4m which will allow the potential for up to 10 grants in the first year. The scheme will then be reviewed and amended as required. We will be consulting with the Resident Advisory Groups on this proposal before seeking approval for a scheme at March Cabinet.
- 3.20 The Rehousing Policy details the support offer and financial compensation available and will cover both secure and temporary accommodation for households. As requested by Overview and Scrutiny on 1st July 2025, it also outlines proactive support for tenants of non-resident leaseholders.
- 3.21 Given the potential impact on many people on the housing register, the Policy and LLP should also be viewed in the context of their impact on the wider housing register.

- 3.22 Section 3 of Appendix 1 seeks views on the current Leaseholder Offer, attached at Appendix 3, and any potential additions or enhancements.
- 3.23 Cabinet approved an enhanced offer for the buyback of leasehold properties within LPS buildings in March 2025, reaffirmed in July 2025. This offer follows government guidance and it has been formed through looking at best practice examples and is based on average local costs. We are also committed to reviewing the costs each year to ensure they remain accurate. Progress to date includes 12 completed sales and a further 12 homes progressing through conveyancing. Depending on the outcomes of the Section 105 consultation, the March 2026 Cabinet Report may recommend issuing in principle demolition notices to enable regeneration of the LPS buildings and sites.
- 3.24 Legal implications for leaseholders differ from those for secure tenants and temporary accommodation households, necessitating a separate consultation process. Should a Compulsory Purchase Order (CPO) be required at any point, the Council will need to demonstrate that reasonable offers have been made to leaseholders. The leaseholder consultation seeks feedback on the current buyback offer and whether other alternatives such as 'lease swap' with another council property or shared equity arrangements should also be considered for resident leaseholders experiencing financial hardship.

4. Analysis and consideration of alternative options

- 4.1 The report to Cabinet planned for 19th March 2026 could have been made without Overview and Scrutiny, however it is considered a more comprehensive approach to include Overview and Scrutiny's view as part of the report to Cabinet.

5. Community engagement and consultation

- 5.1 The LPS consultation programme was designed to ensure comprehensive engagement with all affected stakeholders, in line with statutory requirements and best practice for inclusive consultation. The programme covered the Section 105 consultation for LPS buildings, the wider engagement on the draft Local Lettings Plan (LLP) and Rehousing Policy, as well as the Leaseholder offer.
- 5.2 The consultation in parts and as appropriate was targeted at a broad range of residents and stakeholders, including:
- Secure tenants, as required under the Housing Act 1985 (Section 105)
 - Households in Temporary Accommodation (TA) and Seaside Homes accommodation.
 - Leaseholders, both resident and non-resident
 - Private sector tenants of leaseholders
 - All applicants on the Housing Register
 - Seaside Homes

- 5.3 This ensured that all those directly impacted by potential regeneration, rehousing, or policy changes have had the opportunity to contribute their views.
- 5.4 The programme ran for 12 weeks, from 13th October 2025 to 12th January 2026, and included a variety of engagement activities to maximise opportunities for the resident voice to be heard
- Your Voice Surveys
 - Site-Specific Workshops: Tailored workshops for each block or estate held in November and December 2025.
 - Monthly Drop-ins: Informal sessions throughout the consultation period provided residents with opportunities to ask questions and share views.
 - Resident Advisory Group (RAG) meeting at each site
 - Targeted Engagement: Scheduled focus groups and one-to-one conversations, especially with underrepresented or vulnerable residents, including block door-knocking, face to face visits and tailored support for those facing language, disability, or digital exclusion barriers
 - Post Boxes: Located in communal areas for submitting hard copy surveys, written feedback, and suggestions.
- 5.5 As outlined at 3.12, the results and recommendations from the consultation programme will form the basis of the report to Cabinet on 19th March 2026.
- 5.6 We acknowledge that the draft Local Lettings Plan (LLP) may have broader implications for households on the Housing Register who are not residents of the large panel scheme blocks, including the possibility that some applicants may experience longer waiting times for access to social housing. However, if the wider programme is agreed, it presents an opportunity to deliver new, modern homes that are better aligned with the needs of households on the register. This is particularly relevant for households requiring properties with three or more bedrooms, who often experience the longest waiting times for social housing.
- 5.7 To ensure transparency and gather feedback, we have written to households on the Housing Register on two occasions to highlight the consultation process and provide information on how to respond. In our consultation, we specifically asked households to share their views on how the LLP might affect their opportunities to access social housing and to suggest any additional support that could help them if the LLP is implemented.

6. Financial implications

- 6.1 There are no financial implications in relation to the recommendations made in this report. Any potential options for extending the leaseholder offer are expected to be met from within the approved LPS capital budget allocation and this will be confirmed as part of the March 2026 Cabinet report.

Name of finance officer consulted: Mike Bentley
(08/12/25):

Date consulted

7. Legal implications

- 7.1 There are no direct legal implications in relation to the recommendations made in this report. The legal requirements in relation to the consultation are contained within the body of this report and the legal implications section of the Cabinet report of July 2025.

Name of lawyer consulted: Simon Court: Date consulted (7/1/2026)

8. Equalities implications

- 8.1 The approach to community engagement and consultation for residents living in the Large Panel Systems (LPS) Building and Estates Renewal project was designed to ensure the programme reached all groups living in the buildings and directly affected by the proposed regeneration.
- 8.2 Key equalities-focused activities included:
- Targeted Engagement: The consultation specifically sought to include underrepresented and vulnerable residents, with tailored support for those facing language, disability, or digital exclusion barriers. This included focus groups, one-to-one conversations, block door-knocking, and accessible feedback mechanisms such as post boxes in communal areas.
 - Inclusive Consultation Methods: A variety of engagement activities were offered, including online surveys, site-specific workshops, monthly drop-ins, and Resident Advisory Group meetings at each site. These were designed to accommodate different preferences and needs, ensuring that all voices could be heard.
 - Broad Stakeholder Involvement: The programme engaged secure tenants, temporary accommodation households, Seaside Homes residents, leaseholders (both resident and non-resident), and all applicants on the Housing Register. This comprehensive approach ensured that the consultation reflected the diversity of the affected population.

9. Sustainability implications

- 9.1 None specifically for the purposes of this scrutiny report.

10. Health and Wellbeing Implications:

- 10.1 None specifically for the purposes of this scrutiny report.

Other Implications

11. Procurement implications

- 11.1 None specifically for the purposes of this scrutiny report.

12. Crime & disorder implications:

12.1 None specifically for the purposes of this scrutiny report.

13. Conclusion.

13.1 Views, feedback and comments are sought from Overviews and Scrutiny to:

- Part 1 of appendix 1; namely placed based questions. As outlined at 3.15
- Part 2 of appendix 1, together with any specific views and feedback relating to Appendix 2 and 3; Rehousing Plan and Local Lettings Plan. As outlined above at 3.16 -3.20.
- Part of appendix 1, together with any specific views and feedback relating to Appendix 4, As outlined above at 3,21 – 3,23,

13.2 This is so that the views of Overview and Scrutiny can be considered and incorporated in the March 26 Cabinet report on the results or and recommendations coming out of the consultation programme.

Supporting Documentation

1. Appendices

1. Yourvoice survey questions
2. Draft Rehousing Policy
3. Local Lettings Plan
4. Leaseholder Offer

2. Background documents

1. Link to July 25 Cabinet Papers: [Large Panel System Blocks - Cabinet Paper.pdf](#)
2. Link to March 25 Cabinet Paper: [Large Panel System Blocks Programme Update.pdf](#)