

Brighton & Hove City Council

Place Overview & Scrutiny Committee

Agenda Item 7

Subject: City Plan Update

Date of meeting: 22 July 2026

Report of: Chair of Place Overview and Scrutiny Committee

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Ward(s) affected: All wards

Key Decision: No

For general release

1. Purpose of the report and policy context

- 1.1 Brighton & Hove's Local Plan (known as the City Plan) is the city's key planning policy document. It sets out a vision for the city's future development and evolution and has clear links to the delivery of Outcome 1 of the Council Plan 'A city to be proud of', particularly the aim of 'developing Brighton & Hove as a place where people want to live, work and learn'.
- 1.2 The City Plan will set the direction for how our city will grow and thrive, shaping the places where people live, work and enjoy to create a better Brighton & Hove for all. It will show where new homes and commercial spaces should go, how development should respect the city's unique character and heritage, and how sustainable growth will be matched with the right infrastructure and green spaces.
- 1.3 The City Plan was last discussed at Scrutiny Committee in July 2025 and members noted the work that had been done to that point. This report provides an update on the work undertaken since then and changes to the planning system and national planning policy that will affect the scope of the plan and the way that it is prepared.

2. Recommendations

- 2.1 Overview & Scrutiny notes the progress to date and future timetable for the new City Plan.

3. Context and background information

- 3.1 Brighton & Hove's new Local Plan (which will now be known as the 'Brighton & Hove City Plan' rather than 'City Plan 2041' as previously) will, on adoption, be the primary development plan document for the city and will set a clear vision and planning strategy for the city moving forward. It will replace the existing City Plan Part One and Part Two with a single document.
- 3.2 Work on a new City Plan has been underway for some time, with a first stage of consultation scoping the Key Issues the new plan should address being undertaken from 4 November 2024 to 20 January 2025. This consultation generated a good response from the public and other consultees, with over 700 responses received and provides a robust evidence base to support the new plan. This consultation was the focus of the last discussion at Scrutiny in July 2025.
- 3.3 In February 2025, after the completion of the Key Issues consultation, the new government announced it intended to continue a process of planning reform started by the previous government by introducing a new system for plan-making through implementing relevant provisions in the Levelling Up and Regeneration Act 2023. Transitional arrangements were put in place to enable plans already in production to continue under the existing system if they could be submitted to government for examination by a hard deadline of 31 December 2026. As the City Plan was at a very early stage of preparation, achieving this deadline would have been extremely challenging. Given the risk of significant aborted work if the deadline was missed it was considered prudent to bring the plan forward under the new system.
- 3.4 The City Plan could not progress further under the new system until regulations implementing it came into effect on 25 March 2026. Key aspects of the new system are:
- Plans to be simpler and shorter
 - Plans to be produced within a 30-month timescale
 - A more proportionate approach to the required evidence
 - A series of three 'Gateway' assessments. Gateway 1 is a self-assessment of an authority's readiness to begin the 30-month plan-making process, including establishing project management and governance arrangements, the approach to consulting and engaging on the plan and the anticipated plan content. The second and third gateways involve assessments by the Planning Inspectorate and are intended to identify issues with plan content and evidence at an early stage to ensure plans only proceed to the final public examination process when they are ready.
- 3.5 It should also be noted that an updated National Planning Policy Framework is expected in July 2026. This will introduce clearer national decision-making planning policies that apply everywhere in England. These national policies now deal with many matters which apply consistently across England that were previously set out in local plans. The scope of the City Plan will therefore be more limited than before.

- 3.6 The extent of work already completed means the council has been able to commit to formally starting work on the Plan promptly after the introduction of the new system and has therefore been awarded £108,000 of government funding to assist with its preparation in line with the accelerated timescale.
- 3.7 The plan will cover the council's existing administrative boundaries, excluding the area that falls within the South Downs National Park. Guidance has been sought from MHCLG as to whether the formal commencement of plan-making should be paused to await the outcome of Local Government Reorganisation (LGR). The advice is that it should be progressed based on the council's existing boundaries and not reflect any changes that may result from LGR. This is because any change would not come into effect until April 2028 so the council would not be in a position to plan for any extended area until then. This position is being queried with the ministry as it could result in the council adopting a new City Plan that does not align with amended administrative boundaries.
- 3.8 A Local Plan Timetable was agreed by Cabinet in May and is included in Appendix 1. This sets out the key dates in the process to prepare a 'new-style plan'. The first step is to publish a 'notice of the intention to commence plan-making', a formal public announcement indicating that the council is starting the process of preparing a new local plan. There then begins a minimum 4-month 'getting ready' period before the Gateway 1 self-assessment which will set out details of the council's readiness for formally beginning the preparation phase of the City Plan.
- 3.9 During this 4-month period the new regulations require a 'scoping consultation' to be undertaken. The 'Key Issues' consultation was undertaken in winter 2024/25 was also effectively a scoping consultation, and it is unfortunate that the new regulations require this previous stage to be largely duplicated. It is also unfortunate that government deadlines for securing additional funding mean that the consultation must take place over the summer. Summer holidays may reduce awareness amongst residents and businesses and other stakeholders, and staff holidays will reduce the available resources to prepare for, hold and attend events. This has been mitigated to some extent by extending the consultation period to begin on 14 July and end on 7 September, much longer than the minimum 21 days set out in government guidance.
- 3.10 To minimise the risk of consultation fatigue and to avoid asking for the same information twice, a streamlined, focused approach was agreed by Cabinet for this consultation stage. A short, simple, document has been produced which succinctly outlines what the City Plan is, and the headline topics that it is proposed to address, framed as building on information provided through the Key Issues consultation and in the new draft National Planning Policy Framework. In line with the legal requirements it will also ask how respondents would like to be involved in shaping the plan once the formal preparation phase begins following Gateway 1, expected to be in October 2026. It makes clear that a major consultation on the Plan's Content and Evidence will take place in 2027.

4. Analysis and consideration of alternative options

- 4.1 The option of not progressing a Local Plan is not considered a reasonable alternative option because the council has a statutory duty to produce one.

5. Community engagement and consultation

- 5.1 A Key Issues consultation took place from 4 November 2024 to 20 January 2025 which involved extensive efforts to reach all parts of the local community. Over 700 responses were received, far exceeding the total at the equivalent stage for the existing City Plan Part Two. A summary of the responses has been published on the council's website. Key headlines include broad support for exploring all means of increasing housing density to meet the city's high housing need figure, including gentle densification in the suburbs and taller buildings in appropriate areas. The affordability of housing was a key concern, with strong support for the provision of genuinely affordable housing, especially more social housing.

6. Financial implications

- 6.1 There are no direct financial implications arising from the recommendations of this report as it is for noting. The cost of officer time, document production and consultation associated with City Plan will be funded from existing revenue budget within the Development Planning service.

Name of finance officer consulted: John Lack Date consulted (03/06/26):

7. Legal implications

- 7.1 This report is for noting only and does not involve a decision; therefore there are no direct legal implications arising.
- 7.2 The preparation of the City Plan is subject to statutory requirements and the Council will be required to comply with these requirements to minimise the risk of legal challenges during the progression of the Plan.

Name of lawyer consulted: Katie Kam Date consulted (01 06 2026):

8. Risk implications

- 8.1 A detailed risk-log is maintained to support work on the City Plan. This has been updated to reflect the publication of the new plan-making regulations.

9. Equalities implications

- 9.1 The new City Plan will help deliver equalities outcomes from new development. A Health and Equalities Impact Assessment (HEQIA) will be carried out on draft policies to ensure that they are coordinated to address equalities, and health and well-being outcomes throughout the city.

- 9.2 Data collected through 315 responses to the optional equalities questions in the Key Issues consultation indicated that respondents' profiles were within 10% points of the city average (2021 census) on characteristics of disability, ethnicity, religion, sex and gender identity. Sexual identity was within 15% of the average.

10. Sustainability implications

- 10.1 The City Plan is required to be accompanied by a Strategic Environmental Assessment (SEA). The intention is to broaden the scope of this to ensure that the social and economic aspects of sustainable development are also included to ensure a more well-rounded consideration of sustainable development.

10. Health and Wellbeing Implications:

- 10.1 A Health and Equalities Impact Assessment (HEQIA) will be carried out on draft policies to ensure that they are coordinated to address equalities, and health and well-being outcomes throughout the city.

Other Implications

11. Procurement implications

- 11.1 None relevant to this report.

12. Crime & disorder implications:

- 12.1 None relevant to this report.

13. Conclusion

- 13.1 The Place Overview & Scrutiny is asked to note the work that has been completed to date and the future work programme for the new City Plan.

Supporting Documentation

1. Appendices [delete if not applicable]

1. City Plan Timetable

2. Background documents [delete if not applicable]

1. Key Issues Stage – Interim Consultation Statement (March 2025)

